

**CITY OF SAN BERNARDINO
DEVELOPMENT SERVICES
INITIAL STUDY**

**CITY OF SAN BERNARDINO
INITIAL STUDY FOR
Loma Linda University Health San Bernardino Campus**

PROJECT DESCRIPTION/LOCATION:

Loma Linda University Health San Bernardino is proposing the development of a three-story approximately 150,000 square-foot medical and educational facility in the City of San Bernardino. The Proposed Project is referred to as the Loma Linda University Health San Bernardino (LLUHSB) Campus. The Campus would provide medical services to include: a family medicine clinic and urgent care, orthopedics, pediatrics, dental, behavioral health, imaging, lab, pharmacy, lifestyle training center, and family support. The medical uses at the Campus would be administered by the Social Action Community Health System (SACHS) clinic that is currently located at the former Norton Air Force Base Hospital, at the San Bernardino International Airport property. The Campus would also support a satellite of the Loma Linda University medical education program with development of "The Gateway College". The college curriculum is presently under development in collaboration with the San Bernardino City Unified School District, Loma Linda University, and the San Bernardino Valley Community College System. The curriculum is intended to be a healthcare job training program for young adults to start their careers in the health and medical fields.

The Project Site is approximately 7.24 acres and is located on the southwest corner of West Valley Street and South "G" Street just west of the San Manuel Stadium and within the Central City South (CCS-1) zone and within the Transit Overlay District (TD) Zone. The main entrance to the site would be from South "G" Street with two additional driveways to access the site from West Valley Street (APNs 0136-093-21, 0136-094-16, 17, and 18).

DATE:

August 11, 2014

PREPARED FOR:

Loma Linda University
c/o LLUAHSC Construction
24951 Stewart Street
Loma Linda, CA 92354

PREPARED BY:

Lilburn Corporation
1905 Business Center Drive
San Bernardino, CA 92408
909-890-1818

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The California Environmental Quality Act (CEQA) requires the preparation of an Initial Study when a proposal must obtain discretionary approval from a governmental agency and is not exempt from CEQA. The purpose of the Initial Study is to determine whether or not a proposal, not exempt from CEQA, qualifies for a Negative Declaration or whether or not an Environmental Impact Report (EIR) must be prepared.

1. **Project Title:** LLUHSB Campus

2. **Lead Agency Name:** City of San Bernardino
Address: 300 North "D" Street
San Bernardino, CA 92418

3. **Contact Person:** Aron Liang
Phone Number: (909) 384-5057

4. **Project Location (Address/Nearest cross-streets):** The Proposed Project is located on the west side of G Street, immediately south of West Valley Street on an approximate 7.24-acre site in the City of San Bernardino (refer to Figure 1: Regional Location Map and Figure 2: Vicinity Map).

5. **Project Sponsor:** Loma Linda University Health San Bernardino
Address: c/o LLUAHSC Construction
24951 Stewart Street
Loma Linda, CA

6. **General Plan Designation:** Central City South (CCS-1)

7. **Description of Project (Describe the whole action involved, including, but not limited to, later phases of the project and any secondary, support, or off-site feature necessary for its implementation. Attach additional sheets, if necessary):** Loma Linda University Health San Bernardino (LLUHSB) is proposing the development of a three-story medical and educational facility in the City of San Bernardino. The proposed LLUHSBCampus would include a family medicine clinic and urgent care, orthopedics, pediatrics, dental, behavioral health, imaging, lab, pharmacy, lifestyle training center, and family support. In addition, the Campus would also support student services and provide classrooms, laboratories, and a resource center. Final design of the three-story building would be approximately 150,000 square-feet to house the planned uses. The Project Site is approximately 7.24 acres and is located on the southwest corner of West Valley Street and South "G" Street just west of the San Manuel Stadium and within the Central City South (CCS-1) zone and within the Transit Overlay District (TD) Zone. The TD Zone and its regulations were established in order to implement the City's General Plan policies promoting transit-oriented development within San Bernardino. The intent of the TD Zone is to allow and encourage an appropriate mix and intensity of land uses in a compact pattern around transit stations that will foster transit usage, create new opportunities for economic growth, encourage infill and redevelopment, reduce dependency on the automobile, improve air quality, and promote high

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quality, interactive neighborhoods. The Transit District Overlay Zone (TD Zone) applies to transit station areas within San Bernardino. The TD Zone establishes standards and regulations beyond those required by the underlying base zones.

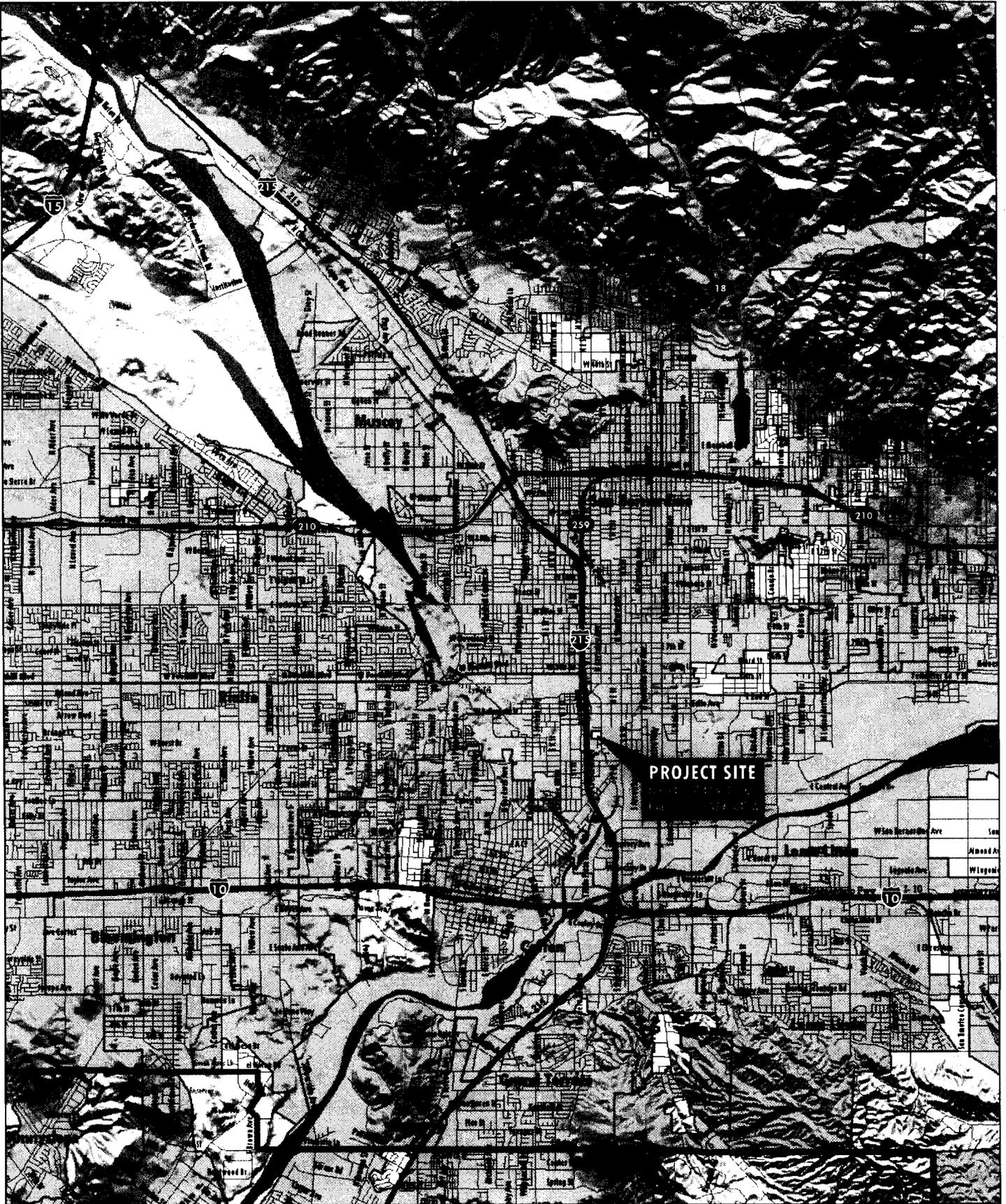
The main entrance to the site would be from South "G" Street with two additional driveways to access the site from West Valley Street. The Project would be constructed in one phase and would include the construction of approximately 431 parking spaces and storm water basins (two underground bio-retention facilities). The "L" shaped facility would be situated near the northeast corner of the Project Site with interior drive paths and parking located along the southern and western portions of the site.

- 8. Surrounding Land Uses and Setting:** The Project Site is vacant with adjacent land uses including San Manuel Stadium parking and commercial development to the east, a drainage ditch followed by privately-owned undeveloped land to the west, vacant land to the south, and commercial/light industrial development to the north. Surrounding land uses include the I-215 Freeway to the west, Caltrans right-of-way to the northwest, San Manuel Stadium to the east, and scattered commercial development and vacant land to the south. Further east and south of the San Manuel Stadium are four (4) legal non-conforming single-family residences.

The Project Site occurs within the Central City South (CCS-1) zone and is within the TD Zone, which was established in order to implement the City's General Plan policies promoting transit-oriented development within the City. The intent of the TD Zone is to allow and encourage an appropriate mix and intensity of land uses in a compact pattern around transit stations that will foster transit usage, create new opportunities for economic growth, encourage infill and redevelopment, reduce dependency on the automobile, improve air quality, and promote high quality, interactive neighborhoods. The TD Zone applies to transit station areas within San Bernardino and establishes standards and regulations beyond those required by the underlying base zones.

The Project Site is located approximately 0.38 miles southwest of an Omnitrans sbX bus line downtown station, specifically referred to as the "E" Street and Rialto Avenue Station. According to the City's Development Code, Chapter 19.19A, Table 19A.01 "Building Form and Placement Standards," education and medical/care facilities are a permitted use within the TD Zone.

- 9. Other agencies whose approval is required (e.g., permits, finance approval, or participation agreement):** None.

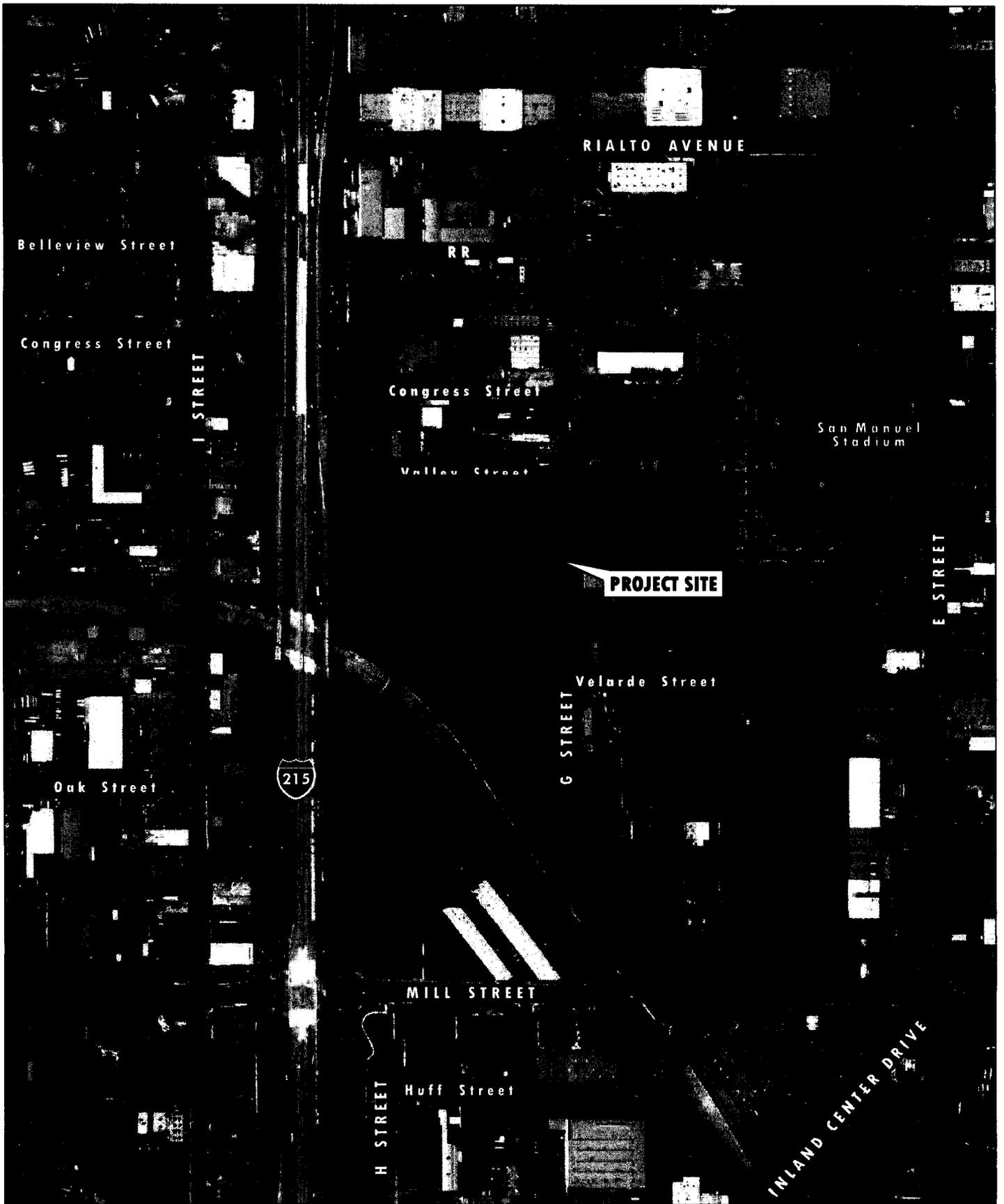


LILBURN
CORPORATION

REGIONAL LOCATION

LLUH SAN BERNARDINO CAMPUS
City of San Bernardino, California

FIGURE 1



PROJECT VICINITY

LLUH SAN BERNARDINO CAMPUS
City of San Bernardino, California

FIGURE 2

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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

- | | | |
|--------------------------------------------------------|-------------------------------------------------------------|---------------------------------------------------|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology / Soils |
| <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology / Water Quality | <input type="checkbox"/> Land Use / Planning |
| <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise | <input type="checkbox"/> Population / Housing |
| <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation / Traffic |
| <input type="checkbox"/> Utilities / Service Systems | <input type="checkbox"/> Mandatory Findings of Significance | |

On the basis of this Initial Study, the City of San Bernardino Environmental Review Committee finds:

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

Signature

Date

Printed Name

For

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	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
I. AESTHETICS – Would the project:				
a) Have a substantial adverse effect on a scenic vista as identified in the City's General Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime view in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Other:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a) According to the City's General Plan, the Proposed Project is not located within a scenic vista and in its currently vacant state does not contain existing scenic resources. The Project Site occurs within the CCS-1 zone and is within the TD Zone, which was established in order to implement the City's General Plan policies promoting transit-oriented development within the City. The proposed LLUHSB Campus is consistent with the City's General Plan, and surrounding commercial development. The site is currently vacant and is bounded on the east by the San Manuel Stadium and commercial development, on the west by a drainage channel, vacant land and the I-215 Freeway, on the north by commercial/light industrial development, and on the south by vacant land. The Project would be developed in accordance with the City's Development Code Chapter 19.19A (Transit Overlay District Zone). No impacts to a scenic vista or damage to a scenic resource would result.
- b) The I-215 Freeway is not a designated state scenic highway. The Project Site occurs over 500 feet east of the I-215 Freeway and does not occur within the Freeway Overlay Zone. There are no historic buildings on-site or within the immediate vicinity, and no rock outcroppings occur on-site. There are a few trees on-site that would be removed to allow for site development. However, the trees have not been maintained and have survived only on rainfall over the past few decades. In their current state, they would not likely survive relocation. The proposed site

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plan includes appropriate landscaping of the site with trees, shrubs and turf. Potential impacts are considered less than significant.

- c) According to the City's Development Code, Chapter 19.19A, Table 19A.01 "Building Form and Placement Standards," the maximum building height within the TD Zone is seven (7) stories. The LLUHSB Campus is proposing a three-story facility and would develop a currently vacant site with a modern building, related parking and landscaping. The Proposed Project would blend with adjacent, surrounding commercial uses. No significant impacts are anticipated.
- d) The Project would not significantly increase light and glare in the surrounding area. The design and placement of light fixtures would be reviewed for consistency with City standards. Standards require shielding, diffusing, or indirect lighting to avoid glare. Lighting would be selected and located to confine the area of illumination to the Project Site. Sensitive receptors within the vicinity include four single-family residences. Residences are also located a sufficient distance, approximately 450 feet southeast of the site; therefore impacts are determined to be less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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II. AGRICULTURE RESOURCES:

- | | | | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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 a non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g), timberland as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Gov't Code section 51104(g))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Involve other changes in the existing | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?				

Discussion:

- a) The Project Site is mapped within California Department of Conservation Farmland Mapping and Monitoring Program Map “San Bernardino County Important Farmland 2010 Sheet 2 of 2.” The proposed LLUHSB Campus is located on land identified as urban and built-up land. No prime farmland, unique farmland, or farmland of statewide importance occurs at the Project Site or in its vicinity. Implementation of the Proposed Project would have no impacts on farmlands or agricultural land.

- b) The Project Site is mapped within the California Department of Conservation, Conservation Program Support map “San Bernardino County Williamson Act FY 2012/2013 Sheet 2 of 2.” and is identified as urban and built-up land. No Williamson Act land occurs at the Project Site or in the vicinity; therefore, no impacts would occur.

- c-e) The Project Site occurs within the CCS-1 zone and within the TD Zone as identified in the City of San Bernardino General Plan. 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 would not be impacted by the Proposed Project as no rezoning from timberland to a non-timberland designation would result. Similarly, the Proposed Project does not involve the conversion of forest land to a non-forest use, or conversion of Farmland to non-agricultural use.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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III. AIR QUALITY – Would the project:

- | | | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------------------------------------|--------------------------|-------------------------------------|
| a) Conflict with or obstruct implementation of the applicable air quality plan? (South Coast Air Basin) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation based on the thresholds in the SCAQMD’s “CEQA Air Quality Handbook?” | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people based on the information contained in Project Description Form?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Other:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

- a) As noted in the City of San Bernardino General Plan Program EIR (Section 4.3.2), continued development within the city will significantly contribute to the further degradation of the ambient air quality of the South Coast Air Basin. The primary cause of the adverse impacts is daily vehicle trips associated with maximum buildout of the City. Any development within the San Bernardino area will aggravate the existing air quality that currently does not meet State or Federal air quality criteria. The proposed project is consistent with the General Plan for which the Program EIR was prepared and impacts evaluated. The project would not conflict with South Coast Air Quality Management District (SCAQMD) Air Quality Plan. Therefore, no impact is anticipated.
- b) Proposed site development and construction was screened using CalEEMod version 2013.2 prepared by the SCAQMD. This model is used to generate emissions estimates for land use development projects. The criteria pollutants screened for included: reactive organic gases (ROG), nitrous oxides (NO_x), carbon monoxide (CO), and particulates (PM₁₀ and PM_{2.5}). Two of these, ROG and NO_x, are ozone precursors. The emission levels listed reflect the estimated winter season levels, which are normally higher due to atmospheric conditions (marine layer) and increased use of heating systems

Construction Emissions

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Construction earthwork emissions are considered short-term, temporary emissions. All Model Default values were used expect for the Architectural Coating Phase. The applicant will be required to paint over a 52 day period rather than the default value of 10 days. Refer to Table 1 for the resulting construction emissions modeled for the Proposed Project.

**Table 1
Construction Emissions Summary
(Pounds Per Day)**

Source/Phase	ROG	NO_x	CO	SO₂	PM₁₀	PM_{2.5}
Site Preparation	5.3	57.0	43.8	0.0	21.3	12.9
Grading	3.9	40.5	27.6	0.0	9.0	5.5
Building Construction	4.1	32.8	23.9	0.0	2.8	2.2
Paving	2.4	26.1	15.8	0.0	1.5	1.3
Architectural Coating	67.2	2.4	2.4	0.0	0.3	0.2
Highest Value (lbs/day)	67.2	57.0	43.8	0.0	21.3	12.9
SCAQMD Threshold	75	100	550	150	150	55
Significant	No	No	No	No	No	No

Source: CalEEMod 2013.2 winter

Phases don't overlap and represent the highest concentration.

As shown in Table 1, construction emissions would not exceed SCAQMD thresholds. Impacts would be less than significant. However, the Applicant would be required to comply with SCAQMD rules and regulations 402 and 403 (watering exposed areas) as well as implement a 52-day (at a minimum) coating schedule. Therefore, the Applicant shall comply with the following mitigation measure:

AQ-1: The construction schedule shall include a 52-day (at a minimum) coating schedule.

Compliance with SCAQMD Rules 402 and 403

The Applicant is required to comply with all applicable SCAQMD rules and regulations as the South Coast Air Basin is in non-attainment status for ozone and suspended particulates (PM₁₀). The project shall comply with, Rules 402 nuisance, and 403 fugitive dust, which require the implementation of Best Available Control Measures (BACM) for each fugitive dust source; and the AQMP, which identifies Best Available Control Technologies (BACT) for area sources and point sources, respectively. This would include, but not be limited to the following BACMs and BACTs:

1. The project proponent shall ensure that any portion of the site to be graded shall be pre-watered prior to the onset of grading activities.
 - (a) The project proponent shall ensure that watering of the site or other soil stabilization method shall be employed on an on-going basis after the initiation of any grading activity on the site. Portions of the site that are actively being graded shall be watered

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regularly to ensure that a crust is formed on the ground surface, and shall be watered at the end of each workday.

- (b) The project proponent shall ensure that all disturbed areas are treated to prevent erosion.
- (c) The project proponent shall ensure that all grading activities are suspended during first and second stage ozone episodes or when winds exceed 25 miles per hour.

Exhaust emissions from construction vehicles and equipment and fugitive dust generated by equipment traveling over exposed surfaces, would increase NO_x and PM₁₀ levels in the area. Although the Proposed Project would not exceed SCAQMD thresholds during construction, the District will be required to implement the following conditions as required by SCAQMD:

- 2. To reduce emissions, all equipment used in earthwork must be tuned and maintained to the manufacturer's specification to maximize efficient burning of vehicle fuel.
- 3. The project proponent shall ensure that construction personnel are informed of ride sharing and transit opportunities.
- 4. The operator shall maintain and effectively utilize and schedule on-site equipment in order to minimize exhaust emissions from truck idling.
- 5. The operator shall comply with all existing and future CARB and SCAQMD regulations related to diesel-fueled trucks, which may include among others: (1) meeting more stringent emission standards; (2) retrofitting existing engines with particulate traps; (3) use of low sulfur fuel; and (4) use of alternative fuels or equipment.

Operational Emissions

Trips associated with the LLUHSB Campus were evaluated in a Traffic Impact Assessment (TIA) prepare by Kunzman and Associated. The project is anticipated to generate approximately 4,393 daily trips. Trip length distribution was evaluated at six miles as the main campus, located in the City of Loma Linda and California State University, San Bernardino are located approximately six miles from the proposed San Bernardino Campus. The San Bernardino Campus will be providing a service to the local community. Operational emissions associated with the proposed project is listed in Table 2.

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**Operations Emissions Summary
(Pounds Per Day)**

Source	ROG	NO_x	CO	SO₂	PM₁₀	PM_{2.5}
Mobile	16.7	34.7	138.9	0.2	13.8	4.0
Energy	0.0	0.1	0.1	0.0	0.0	0.0
Area	3.9	0.0	0.0	0.0	0.0	0.0
Total Value (lbs/day)	20.7	34.9	139.0	0.2	13.8	4.0
SCAQMD Threshold	55	55	550	150	150	55
Significant	No	No	No	No	No	No

Source: CalEEMod 2013.2 winter

As shown in Table 2 Operational Emissions are less the SCAQMD thresholds. Therefore, operational impacts are anticipated to be less than significant.

- c) The proposed project individually would not exceed any SCAQMD thresholds for criteria pollutants. The City of San Bernardino General Plan Update Draft EIR (Section 4.3.2) concluded that continued development would contribute to pollutant levels (buildout, daily vehicle trips) in the San Bernardino area, which already exceed State and Federal air quality criteria. Findings on potentially significant impacts of the General Plan update indicated that policies contained in the General Plan update and mitigations in the EIR are expected to reduce emissions associated with future development. However, even after application of these policies and mitigation measures, the General Plan update when viewed as a whole project, is expected to generate emissions levels that would exceed the AQMD thresholds for criteria pollutants, resulting in a significant unavoidable adverse air quality impact. A Statement of Overriding Considerations for the General Plan Update EIR was adopted by the City Council in November 2005.
- d) The project site is predominately surrounded by commercial land uses and private undeveloped land, with the I-215 Freeway located approximately 125 feet west of the site. The proposed project is not anticipated to exceed SCAQMD thresholds as discussed above. The nearest sensitive receptors (four single-family residences, legal nonconforming land uses) occur approximately 400 feet southeast of the site, south of G Street. An increase in air quality emissions produced as a result of construction activities would be short-term, below SCAQMD significance thresholds, and would cease once construction is complete. Dust suppression (i.e., water application) as required by the City's Development Code, would reduce 50 to 75 percent of fugitive dust emissions during construction. As shown in Table 2 operational emissions are below SCAQMD thresholds. Therefore, impacts to sensitive receptors are anticipated to be less than significant.
- e) The proposed project is the development of a 150,000 square-foot medical and educational facility on an approximate 7.24-acre site within the Central City South-1 zone. The end use of the proposed project is not anticipated to generate objectionable odors. No impact is anticipated.

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IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Other:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion:

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- a) Critical habitat identifies specific areas that are essential to the conservation of a listed species and, with respect to areas within the geographic range occupied by the species. Records of observation for sensitive species were retrieved from the California Natural Diversity Data Base (CNDDDB) on May 30, 2014 for the San Bernardino South and Redlands USGS 7.5-minute quadrangles. The CNDDDB does not report past observations of sensitive species at the Project Site or in its vicinity. According to the City of San Bernardino General Plan Land Use Map, the site is designated Central City South-1 and not within an area designated as having the potential for sensitive wildlife (General Plan Figure NRC-1). The area is developed with primarily commercial land uses; the Project Site was previously developed and is considered infill. It is also adjacent to a site previously used for construction material stockpiling during construction of I-215 improvements. Therefore, it is anticipated that no impacts to any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service would result.
- b) The site is currently vacant and is characterized as occurring within a highly disturbed area. Although adjacent to a City-owned v-ditch, there were no riparian habitat or other sensitive natural communities observed on-site. There is no riparian habitat or other sensitive natural communities identified in the City's General Plan. No impacts would occur to riparian areas or sensitive natural communities identified in local or regional plans, policies regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service.
- c) During a recent visit to the site in May 2014, no surface waters were observed, including wetlands as defined by Section 404 of the Clean Water Act. Therefore, the Proposed Project would not impact federally-protected wetlands.
- d) The Project Site is located approximately 500 feet east of the I-215 Freeway and within an urbanized area with existing development occurring in the immediate vicinity. Therefore, it is unlikely to provide an important location relative to regional wildlife movement. Wildlife movement near the site has been restricted by development, including the freeway and adjacent roadways. Implementation of the Proposed Project would not impact a local or regional wildlife corridor.
- e) The nearest conservation area is the Cajon Creek (Cal Mat) Habitat Conservation Management Area located approximately five miles northwest of the site. The Proposed Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan.

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V. CULTURAL RESOURCES – Would the project:				
a) Be developed in a sensitive archaeological area as identified in the City’s General Plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of CEQA?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5 of CEQA?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Other:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion:

a-c) According to Figure 5.4-2 of the City of San Bernardino’s General Plan EIR, the site occurs within the Urban Archaeological District and has the potential to contain historical resources. However, the site is outside of the area of concern for archeological resources.

In May 2014, McKenna et al. prepared a Cultural Resources Investigation for the Project Site. As noted in the report, the project area is located near a branch of Lytle Creek, a fresh water source within the City of San Bernardino and relatively close to the project area (approximately 150 feet southwest of the Project Site). While there is always a potential for buried prehistoric archaeological resources along major water courses, no physical evidence of such resources has been reported in this area and only one prehistoric archaeological resource (Urbita Springs) has been reported within one-mile; the site has since been destroyed. The report tentatively concluded that the project area has a very low level of sensitivity for the identification of prehistoric archaeological resources.

The Project Site is currently vacant with surficial evidence of property clearance. This clearance has been associated with basic site vegetation clearing (weed abatement), but also the result of demolition of previous (pre-1968) commercial improvements. There is no physical evidence of

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any of the earlier property uses. Likewise, no evidence of prehistoric archaeological resources. The property is considered clear of any potentially significant cultural resources. Therefore, the proposed development would not result in any adverse environmental impacts with respect to cultural resources, as no resources were identified within the project area. However, in the event cultural resources are uncovered during any construction excavation activities, the following mitigation measure shall be required:

CR-1: If previously unidentified cultural resources are uncovered as a result of any earthwork, a qualified archaeologist shall be permitted to examine the find(s) and assess the significance in accordance with CEQA and NEPA guidelines and criteria for identifying significant resources.

Implementation of the above mitigation measure would ensure potential impacts to cultural resources are reduced to a less than significant level.

- d) Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. Paleontological sites generally occur as small outcroppings visible on the surface of sites encountered during grading. Generally, it is geologic formations that contain fossils. Potentially sensitive areas for the presence of paleontological resources are based on the underlying geologic formation. Fossil remains may occur throughout the City. Since the distribution is unknown, the following mitigation measure shall be implemented:

CR-2: In the event paleontological resources are unearthed, a qualified paleontologist shall be contacted to determine if reporting the finds is required and if further monitoring during the earthwork is warranted. If, at any time, resources are identified, the paleontologist shall make recommendations to the City of San Bernardino for appropriate mitigation measures in compliance with the guidelines of the CEQA and NEPA.

Implementation of the above mitigation measure would reduce impacts to potential paleontological resources to a less than significant level.

- e) Construction activities, particularly grading, soil excavation and compaction, could adversely affect unknown buried human remains. The following mitigation measure shall be implemented to reduce potential impacts to less than significant:

CR-3: If human remains of any kind are found during earthwork activities, all activities must cease immediately and the San Bernardino County Coroner and a qualified archaeologist must be notified. The Coroner will examine the remains and determine the next appropriate action based on his or her findings. If the coroner determines the remains to be of Native American origin, he or she will notify the Native American Heritage Commission whom will then identify the most likely descendants to be consulted regarding treatment and/or reburial of the remains. If a most likely descendant cannot be identified, or the most likely descendant fails to make a recommendation regarding the treatment of the remains within 48 hours after gaining access to them, the contractor shall rebury the Native American

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human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
VI. GEOLOGY AND SOILS – Would the project:				
a) Expose people or structures to 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 181-B of the California Building Code (2001) creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
f) Modify any unique physical features?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

- a) The Project Site is located in the San Bernardino Valley at the northern edge of the Peninsular Ranges Geomorphic Province. The San Bernardino Valley is part of a structurally down-dropped block of crystalline bedrock material overlain by approximately 300 to 400 feet of alluvium and bordered to the north and east by the northwest- to southeast-trending San Andreas Fault and San Bernardino Mountains. The valley is bordered by the Perris block to the south and by the northwest- to southeast-trending San Jacinto fault zone to the southwest. The sediments underlying the site are mapped as Holocene-age unconsolidated alluvium (Morton, 1978).

In May 2014, CHJ Consultants performed a Geotechnical Investigation at the Project Site. Results of the findings are presented herein.

- i) The Project Site is located outside of an Alquist-Priolo Special Studies Zone as depicted on Figure S-3 of the City of San Bernardino General Plan. Reviews of official maps delineating State of California earthquake fault zones (7.5 Minute Series, State of California Special Studies Zones, San Bernardino North Quadrangle, Official Map) indicated the site is not located within a zone for mandatory study for active faulting. The nearest fault is the San Jacinto Fault located approximately one-mile southwest of the Project Site. The potential for surface ground rupture at the site is considered low and therefore less than significant impacts are anticipated.
- ii) The San Jacinto fault zone is a system of northwest-trending, right-lateral, strike-slip faults, and is the closest known active fault to the Project Site (occurring approximately one-mile southwest of the Project Site), and is considered the most important fault to the site with respect to the hazard of seismic shaking and ground rupture. More large historic earthquakes have occurred on the San Jacinto fault than any other fault in Southern California. Severe seismic shaking can be expected during the lifetime of the Proposed Project. According to the 2013 California Building Code (CBC) and based on the geologic setting and data obtained in the exploratory borings, the soils underlying the site are classified as Site Class "D." Proposed construction is required to be in accordance with applicable requirements for development within Seismic Zone 4 as listed within the Uniform Building Code (UBC), and therefore would ensure that potential impacts are reduced to the maximum extent possible. A less than significant impact is anticipated.
- iii) According to the City of San Bernardino General Plan, the Project Site is located within an area identified as being underlain by soils with a potential for liquefaction. Liquefaction is caused by buildup of excess hydrostatic pressure in saturated cohesionless soils due to

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cyclic stress generated by ground shaking during an earthquake. The significant factors on which liquefaction potential of a soil deposit depends, among others include, soil type, relative soil density, intensity of earthquake, duration of ground shaking, and depth of ground water.

During the geotechnical investigation, groundwater was not encountered within the maximum 7³/₄-foot depth attained in the exploratory borings. In an investigation completed by CHJ in 1985, groundwater was encountered at a depth of approximately 12 feet below ground surface (bgs). Water well data indicates historic high groundwater on the order of 5 feet bgs at the site. Based on field test, and historic data, liquefaction could occur within soil layers at depths ranging from 5 to 12 feet bgs and within other deeper soil layers during shaking levels consistent with the design earthquake. Because of the inadequate thickness of the non-liquefiable crust at the site, surface manifestation effects of liquefaction on the structure are estimated to be potentially significant, with a maximum seismic settlement potential of 3.6 inches under current conditions. The upper 7 to 12 feet, locally to 17 feet, of existing near-surface soils are loose to very loose and in their present condition would not provide uniform or adequate support for the proposed structure or other site improvements.

Because of the potential for liquefaction and seismic settlement, the following mitigation measure, as obtained from the geotechnical investigation, shall be implemented:

- GEO-1: If the proposed structure is supported by conventional shallow foundations, then the upper 12 feet, locally up to 17 feet, of existing soils shall be excavated and replaced as properly compacted fill within the proposed building area of the structure.**
- GEO-2: Prior to fill placement, a geotechnical engineer shall review the exposed surface to ensure sub-excavation included the removal of any undocumented fills. Sub-excavation shall be to a minimum depth of three (3) feet within remaining settlement-sensitive areas to be graded (i.e. parking areas, hardscape areas and any other settlement-sensitive areas) and within the building pad area or other settlement-sensitive area and to a distance of ten (10) feet beyond foundation lines. Removed and cleaned soils may be reused as properly compacted fill as noted in enclosure "D-17" of the May 2014 Geotechnical Investigation.**
- GEO-3: Prior to replacement of the excavated soil, the bottom of the excavations shall be observed by a geotechnical engineer to verify the complete removal of undocumented fill material and loose/disturbed native soils. Following approval, the bottom of the excavated areas shall be scarified to a depth of approximately six (6) inches, moistened to at least optimum moisture content, and re-compacted to a minimum relative compaction of 35 percent. The excavation shall then be refilled with properly compacted fill.**

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- GEO-4: All footings shall rest entirely upon at least 36 inches of properly compacted fill material.**
- GEO-5: On-site soils shall provide adequate quality fill material, provided it is free from roots, other organic matter, and deleterious material. Rock or similar irreducible material with a maximum dimension greater than three (3) inches shall not be buried or placed in fills.**
- GEO-6: If imported fill is utilized, it shall be inorganic, non-expansive, granular soil free from rocks greater than three (3) inches in maximum dimension. Sources of import fill shall be observed and approved by the geotechnical engineer prior to its use. The proposed import fill should be tested and approved by the geotechnical engineer relative to expansion potential, sulfate content and corrosion potential.**
- GEO-7: Fill shall be spread in near-horizontal layers, approximately eight (8) inches in thickness unless approved by the geotechnical engineer. Each lift shall be spread evenly, thoroughly mixed during spreading to attain uniformity of the material and moisture in each layer, brought to at least optimum moisture content and compacted to a minimum relative compaction of 95 percent.**
- GEO-8: A final compaction report should be issued by the geotechnical engineer of record at the completion of the grading operation.**
- GEO-9: Footings shall be a minimum of 24 inches wide and shall be established at a minimum depth of 24 inches below the lowest adjacent final subgrade level.**

Implementation of the above mitigation measures would ensure the mandatory removal and replacement of a minimum 12 feet of existing soil and ensure that hydroconsolidation settlement would be negligible and seismic settlement would be reduced significantly. Therefore, potential impacts from liquefaction would be reduced to a less than significant level.

- iv) The Project Site is not located within an area that has geologic hazards associated with landslides or mudslides as identified in Section 10.0 Safety, Figure S-5 of the City's General Plan. Since the Project Site is relatively flat, the probability of seismically-induced landslides is considered low. No impacts would result.
- b) During the development of the Project Site, which would include disturbance of approximately 7.24 acres, project dust may be generated due to the operation of machinery on-site or due to high winds. Additionally, erosion of soils could occur due to a storm event. The City of San Bernardino requires the preparation of a Water Quality Management Plan (WQMP) for development projects that fall within one of eight project categories established by the RWQCB. According to the San Bernardino County WQMP template, the Proposed Project will require a

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WQMP because it is considered new development involving the creation of 10,000 square-feet or more of impervious surface collectively over the entire site, and creating a parking lot of 5,000 square feet or more. Refer to the Hydrology and Water Quality section of this Initial Study for a comprehensive discussion. Impacts related to soil erosion are considered less than significant.

- c) According to the City of San Bernardino General Plan, the Project Site is located in an area of potential ground subsidence. Subsidence due to fluid withdrawal (groundwater pumping) has been documented in the San Bernardino Valley region. However, the surface effects are distributed across a wide region. Distributed subsidence is not expected to produce building-scale effects within the vicinity of the site. In addition, given the flat-lying topography of the site, the potential of slope instability or landslides is considered very low. No impacts are anticipated.
- d) Expansive soils (shrink-swell) are fine grained clay soils generally found in historical floodplains and lakes. Expansive soils are subject to swelling and shrinkage in relation to the amount of moisture present in the soil. Structures built on expansive soils may incur damage due to differential settlement of the soil as expansion and contraction takes place. Information about shrink-swell classes and linear extensibility is available in the Natural Resources Conservation Service (NRCS) soil survey reports. The shrink-swell classification indicates the relative change in volume that may be expected with changes in moisture content that is the extent to which the soil shrinks as it dries out or swells when it gets wet. The extent of shrinking and swelling is influenced by the amount and kind of clay in the soil. A high shrink-swell potential indicates a hazard to maintenance of structures built in/on/or with material having this rating. Moderate to low ratings lessen the hazard. The soil class at the site is identified as Tujunga gravelly loamy sand (TvC). The NRCS identifies the shrink-swell potential for this soil type as low; therefore no impacts related to expansive soils are anticipated.
- e) The Proposed Project does not include the installation of septic tanks or any other alternative wastewater disposal systems. The LLUHSB Campus will be connect to the existing sewer main adjacent to the Project Site within "G" Street. No impacts would result.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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VII. GREENHOUSE GAS EMISSIONS – Would the project:

- | | | | | |
|----------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Generate greenhouse gas emission, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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Discussion:

According to CEQA Guidelines Section 15064.4, when making a determination of the significance of greenhouse gas emissions, the “lead agency shall have discretion to determine, in the context of a particular project, whether to (1) use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use.” Moreover, CEQA Guidelines section 15064.7(c) provides that “a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts” on the condition that “the decision of the lead agency to adopt such thresholds is supported by substantial evidence.”

The City of San Bernardino has not adopted its own thresholds of significance for greenhouse gas emissions. However, the City finds persuasive and reasonable the approach to determining significance of greenhouse gas emissions established by SCAQMD.

- a) Per CEQA guidelines, new project emissions are treated as standard emissions, and air quality impacts are evaluated for significance on an air basin or even at a neighborhood level. Greenhouse gas emissions are treated differently, in that the perspective is global, not local. Therefore, emissions for certain types of projects might not necessarily be considered as new emissions if the project is primarily population driven. Many gases make up the group of pollutants that are believed to contribute to global climate change. However three gases are currently evaluated: Carbon dioxide (CO₂), Methane (CH₄), and Nitrous oxide (N₂O). SCAQMD provides guidance methods and/or Emission Factors that are used for evaluating a project’s emissions in relation to the thresholds. A threshold of 3,000 MTCO₂E per year has been adopted by SCAQMD for non-industrial projects as potentially significant or global warming (Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, SCAQMD, October 2008). The modeled emissions anticipated from the Proposed Project compared to the SCAQMD interim threshold are shown below in Table 3 and Table 4, construction emissions and operational emissions, respectively.

**Table 3
Construction Emissions
Greenhouse Gases Greenhouse
Metric Tons per Year**

Source/Phase	CO₂	CH₄	N₂O
Site Preparation	19.5	0.0	0.0
Grading	29.8	0.0	0.0
Building Construction	393.9	0.1	0.0
Paving	1.2	0.0	0.0
Total (MTCO₂e)	471.2		
SCAQMD Threshold	3,000		
Significant	NO		

Source: CalEEMod 2013.2.2 Annual

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**Table 4
Operations Emissions Summary
Greenhouse Gases Greenhouse
Metric Tons per Year**

Source	CO ₂	CH ₄	N ₂ O
Area	0.0	0.0	0.0
Energy	488.1	0.0	0.0
Mobile	2,312.0	0.1	0.0
Waste	27.4	1.6	0.0
Water	87.5	0.6	0.0
Total (MTCO₂e)	2,971.0		
SCAQMD Threshold	3,000		
Significant	NO		

Source: CalEEMod 2013.2 winter

As shown in Table 3 and Table 4, the proposed development would not result in GHG emissions exceeding the SCAQMD threshold; therefore a less than significant impact is anticipated.

- b) There are no existing GHG plans, policies, or regulations that have been adopted by CARB or SCAQMD that would apply to this type of emissions source. It is possible that CARB may develop performance standards for Project-related activities prior to Project construction. In this event, these performance standards would be implemented and adhered to, and there would be no conflict with any applicable plan, policy, or regulation; therefore, impacts would be less than significant, and no mitigation would be required.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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VIII. HAZARDS AND HAZARDOUS MATERIALS

– Would the project:

- | | | | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Other:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a) Bio-medical wastes would be generated by the medical uses associated with the Campus. Applicable State and federal requirements for hospitals, including the appropriate procedures for disposal and transport of bio-medical wastes, would be followed. The Medical Waste Management Act (MWMA) governs the management of medical waste statewide through the Health and Safety Code. The Medical Waste Management Program (MWMP) housed within the Environmental Management Branch of the California Department of Public Health (CDPH), implements the Act through regulation of the generation, handling, storage, treatment, and disposal of medical waste. The MWMP permits and inspects all medical waste off-site treatment facilities and medical waste transfer stations. Under the MWMA, any entity that produces

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medical waste is considered a “medical waste generator” in California and are required to prepare medical waste disposal programs. Therefore, operation of the hospital and medical office building would not create a significant hazard to the public or the environment with the facility complying with federal and State regulations regarding the disposal and transport of bio-medical wastes.

The Proposed Project’s construction activities would not create a significant hazard to the public or to the environment through the routine transport, use, or disposal of hazardous materials because construction of a medical office building would not involve such activities. No significant impacts would result.

- b) The project would not 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. Bio-medical and other medical facility wastes would be generated at the Campus and managed as discussed above.

A Phase I Environmental Site Assessment was performed at the Project Site by CHJ consultants in December 2012. The assessment concluded that the following Recognized Environmental Conditions (RECs) in connection with the site:

- Significant industrial development on the north and east portions of the site from prior to 1930 through the 1960s represents an REC due to the unknown use of chemicals, solvents, and other hazardous materials that may have been used on-site and the unspecified storage and/or disposal practices.
- Based on the on-site asbestos sampling and reporting, the Project Site has been designated by the SCAQMD as a site with asbestos containing soil. Although trace asbestos was found in limited areas, this condition represents an REC for the entire site that will likely require continued AQMD oversight.

During the December 2012 and May 2014 site visits, there was no evidence of underground or above ground storage tanks, no unusual odors, no standing water or other pools of liquid, no drums or stained soils, and no other hazardous substances or other petroleum-based or unidentified substance containers were observed.

During preparation of the Phase I Site Assessment, a request for records search was submitted to the County Hazardous Materials Division (HMD) on October 26, 2012. The review includes any recorded information regarding above-ground storage tanks (ASTs), underground storage tanks (USTs), hazardous waste generators, hazardous material handlers, site remediation, and emergency response records specific to the address. The County HMD Certified Record Search Findings Letter, dated November 16, 2012, indicated that no records were found for the Project Site. Following the receipt of the AQMD records on December 6, 2012, an email request was submitted to the HMD for a review of the possibility that any records for the Project Site may be combined with files for the property described as Rancho San Bernardino 6 & 7 parcels to the south. This was due to the fact that a complaint filed by Mr. Curtis Brundage, HMD Inspector, in

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2003 to AQMD regarding possible asbestos on the property to the south initiated the on-site asbestos concerns. On December 11, 2012, an incident report for Rancho San Bernardino was identified and provided to CHJ. On January 6, 2003, Caltrans had reported a possible dump site of asbestos containing powder and solids west of "G" Street.

In September 2013, an Asbestos Abatement Project Report was prepared for the Project Site by Masek Consulting Services, Inc. The report concluded that at the time buildings were demolished on-site (circa 1968) and also on adjacent properties (date unknown), asbestos abatement was not required. An asbestos debris pile, mostly located on the property to the south, was spread and extended to the Project Site when the drainage channel (immediately west of the Project Site) was constructed. Given the extensive investigation and asbestos abatement, it is unlikely that asbestos material would be encountered on-site, however in the event additional material is discovered during excavation for the building and parking lot, the following mitigation measure shall be implemented:

HM-1: In the event construction/demolition debris are encountered during earthwork, an environmental consultant specializing in asbestos abatement shall be contacted to remove the material in accordance with applicable State regulations.

- c) Alta Vista Public Charter School, located along West Rialto Avenue in San Bernardino, occurs within approximately ¼-mile of the Project Site. The Proposed Project would not result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. No impact to the nearby school is anticipated.
- d) Pursuant to California Government Code Section 65962.5 the California Department of Toxic Substances Control (DTSC) compiles the Cortese List and updates it at least annually. The Cortese List includes hazardous waste facilities subject to corrective action, land designated as hazardous waste property or border zone property, sites included in the abandoned site assessment program, and qualifying sites pursuant to Section 25356 of the Health and Safety Code. A copy of the most recent Cortese List was retrieved from the DTSC EnviroStor online Database on June 3, 2014; the Project Site is not identified on the list. No impacts are anticipated.
- e) As shown in Figure LU-4 of the City's General Plan, the Project Site does not occur within the San Bernardino International Airport (SBIA) Influence Area. Therefore, the Project would not result in safety hazard impacts from aircraft-related uses.
- f) The Proposed Project is not anticipated to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Development of the LLUHSB Campus would not result in changes to the local roadway or other transportation system. No impact is anticipated.
- g) As shown on Figure S-9 in the City's General Plan, the Project Site does not occur in a fire hazard area. The site and surrounding area are urbanized and located over 4.5 miles south of the nearest fire hazard designated area. No impacts are anticipated.

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	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
e) 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, such as from areas of material storage, vehicle or equipment maintenance (including washing or detailing), waste handling, hazardous materials handling or storage, delivery areas, loading docks, or other outdoor areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? (Panel No. 8684F)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
k) Other:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a,f) The Proposed Project would disturb approximately 7.24 acres and therefore would be subject to the National Pollutant Discharge Elimination System (NPDES) permit requirements. The State of California is authorized to administer various aspects of the NPDES. Construction activities covered under the State's General Construction permit include removal of vegetation, grading, excavating, or any other activity that causes the disturbance of one-acre or more. The General Construction permit requires recipients to reduce or eliminate non-storm water discharges into

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

The RWQCB has issued an area-wide NPDES Storm Water Permit for the County of San Bernardino, the San Bernardino County Flood Control District, and the incorporated cities of San Bernardino County. The City of San Bernardino then requires implementation of measures for a project to comply with the area-wide permit requirements. A SWPPP is based on the principles of Best Management Practices (BMPs) to control and abate pollutants. The SWPPP must include (BMPs) to prevent project-related pollutants from impacting surface waters. These would include, but are not limited to street sweeping of paved roads around the site during construction, and the use of hay bales or sand bags to control erosion during the rainy season. BMPs may also include or require:

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

In addition to complying with NPDES requirements, the City of San Bernardino also requires the preparation of a Water Quality Management Plan (WQMP) for development projects that fall within one of eight project categories established by the RWQCB. Since the Proposed Project is a new development involving the creation of 10,000 square feet or more of impervious surface and a parking lot area in excess of 5,000 square feet, it is considered a Category project. In May 2014, the project proponent submitted a WQMP to the City for review and approval.

As part of the WQMP, all Category projects must identify any hydrologic condition of concern that would be caused by the project, and implement site design, source control, and/or treatment control BMPs to address identified impacts. Since the downstream conveyance channels that would receive runoff from the project are not all engineered, hardened and regularly maintained, hydrologic conditions of concern were identified for the project. To ensure potential impacts are reduced to less than significant, the following mitigation measures, as provided in the WQMP, shall be implemented.

HW-1: The Project Proponent shall employ an educational program to staff encompassing the importance of stormwater management and BMP implementation.

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- HW-2:** The Project Proponent shall establish the following policies prohibiting activities during operations: 1) Prohibit discharge of fertilizer, pesticide, or animal waste to street or storm drain; 2) Prohibit blowing or sweeping of debris (leaf litter, grass clippings, litter, etc.) into street or storm drain; 3) Require dumpster lid to be closed at all times; 4) Prohibit discharge of paint or masonry waste to street or storm drain; and 5) Prohibit vehicle washing, and maintenance or repair on-site.
- HW-3:** The Project Proponent shall direct maintenance staff to employ landscaping practices be consistent with the City of San Bernardino requirements for use of fertilizer, pesticides, and City ordinances for water conservation.
- HW-4:** The following BMPs and practices shall be employed and regularly maintained: Site Design BMPs; Site Design & Landscape Planning; Efficient Irrigation, Storm Drain Signage Trash Storage Areas; Source Control BMPs; Non-Stormwater Discharges; Spill Prevention, Control and Cleanup; Building and Grounds Maintenance; Drainage System Maintenance; Treatment Control BMP; and Bio-Retention System.
- HW-5:** The owner shall direct maintenance staff to implement trash management and litter control procedures in common areas aimed to reduce pollution of drainage water. Activities entail litter patrol, emptying of trash receptacles, noting trash disposal violations and reporting violation for investigation.
- HW-6:** The owner shall provide employee training for protection of stormwater. Employee training shall be provided within first 30 days of employment and annually thereafter. Training materials will entail review of WQMP information and BMP fact sheets.
- HW-7:** Catch basins shall be inspected, cleaned, and maintained annually. Cleaning shall be conducted prior to rainy season (October 1 through April 30). Drainage facilities include catch basins / storm drain inlets.
- HW-8:** Street sweeping shall be conducted in paved areas and parking areas once each month. Municipal waste shall be disposed in trash receptacles which are emptied, at a minimum of once each week.

Implementation of Mitigation Measures HW-1 through HW-8 would ensure potential impacts to water quality are reduced to a less than significant level.

- b) The Project Site is currently vacant; no groundwater recharge facilities exist on-site. The Proposed Project would be consistent with the General Plan, and therefore no significant impact to groundwater resources would result.
- c-e) Based on a recent site visit and review of the USGS San Bernardino North 7.5 Minute Quadrangle, there are no rivers or streams that occur on-site. The concrete-lined Lytle Creek

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Channel is approximately 170 feet south of the project site boundary. Development of the site includes the construction of a 150,000 square-foot building, concrete and asphalt paving, and landscaped areas. The project would generate stormwater due to the increased amount of hardscape surfaces. A dual drainage system consisting of landscaped areas and two underground bio-retention basins are proposed on-site. Storm water runoff would be directed toward landscape areas and the underground bio-retention basins, which are designed to manage the increase in storm water runoff from a 100-year storm event. The two bio-retention basins would be located near the southwest and southeast corners of the site. Construction of the proposed on-site drainage system would ensure surface runoff would not result in flooding on- or off-site; and therefore making this potential impact less than significant.

- g-h) According to the City's General Plan, Figure S-1 "100 Year Flood Plain," the Project Site does not occur within a 100-year flood zone. Evidence of historic flooding of the southwest portion of the site was observed in aerial images reviewed as part of the May 2014 Geotechnical Investigation. Lytle Creek has since been channelized to manage flood flows. No impacts would result.
- i) Flood inundations resulting from the failure of the Seven Oaks Dam is a potential hazard in the City of San Bernardino. According to General Plan Figure S-2, the Project Site occurs outside of the Seven Oaks Dam inundation area. No significant impacts are anticipated.
- j) The Project Site is not located in a coastal area. No large bodies of water or water storage facilities existing within the area; therefore impacts from seiche and tsunami are not anticipated.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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X. LAND USE AND PLANNING – Would the project:

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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Conflict with any applicable habitat conservation plan or natural community conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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d) Be developed within the Hillside Management Overlay District?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Be developed within Foothill Fire Zones A, B, or C as identified in the City's General Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be developed within the Airport Influence Area as adopted by the San Bernardino International Airport Authority?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Other:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a-b) The Proposed Project is the development of a three-story, approximate 150,000 square-foot, medical and educational facility to include a family medicine clinic and urgent care, orthopedics, pediatrics, dental, behavioral health, imaging, lab, pharmacy, lifestyle training center, and family support on an approximate 7.24-acre site within the Central City South (CCS-1) zone and within the Transit Overlay District (TD) Zone. The TD Zone and its regulations were established in order to implement the City's General Plan policies promoting transit-oriented development within San Bernardino. The intent of the TD Zone is to allow and encourage an appropriate mix and intensity of land uses in a compact pattern around transit stations that will foster transit usage, create new opportunities for economic growth, encourage infill and redevelopment, reduce dependency on the automobile, improve air quality, and promote high quality, interactive neighborhoods. The Transit Overlay District (TD) Zone applies to transit station areas within San Bernardino. The TD establishes standards and regulations beyond those required by the underlying base zones.

The Project Site is located approximately 0.38 miles southwest of a Downtown Station Area ("E" Street and Rialto Avenue) for the Omnitrans sbX bus line. According to the City's Development Code, Chapter 19.19A, Table 19A.01 "Building Form and Placement Standards," education and medical/care facilities are a permitted use within the TD Zone. The Project Site is vacant with adjacent land uses including the San Manuel Stadium and commercial development to the east, a drainage ditch followed by privately-owned undeveloped land and I-215 to the west, vacant land to the south, and commercial/light industrial development to the north. The Proposed Project would be consistent with the General Plan and would not physically divide an established community. No significant impacts are anticipated.

- c) There are no habitat conservation or natural community conservation plans adopted for the area of the Proposed Project. The nearest conservation area is the Cajon Creek (Cal Mat) Habitat

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Conservation Management Area located approximately three miles northwest of the site. No impact to a habitat conservation plan or natural community conservation plan is anticipated.

- d) According to the General Plan, properties that contain areas of 15-percent slopes and greater are considered within the Hillside Management Overlay District (HMOD). The Project Site is relatively flat and sits at an estimated southern elevation of 1,030 feet and a northernmost elevation of 1,033 feet. Maximum overall relief within the 7.24-acre site is approximately three feet. No impacts from development within a hillside would occur.
- e) As shown on Figure S-9 in the City's General Plan, the Project Site does not occur in a fire hazard area. The site and surrounding area are urbanized and located over four miles south of the nearest fire hazard designated area. No impacts from wildland fires are anticipated.
- f) As shown in Figure LU-4 of the City's General Plan, the Project Site occurs outside of the San Bernardino International Airport (SBIA) Influence Area. No impacts to aircraft are expected.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XI. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located in a Mineral Resource Zone as adopted by the State Mining and Geology Board and identified in the City's General Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

- a-b) No loss of valuable mineral resource will occur with the development of the project. The project will demand aggregate resources during construction. Steel, wood, concrete, and asphalt will be required as part of the construction. These resources are commercially available in the southern California region without any constraint and no potential for adverse impacts to the natural resources base supporting these materials is forecast to occur over the foreseeable future. The project demand for mineral resources is less than significant due to the abundance of available local aggregate resources.

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- c) The Project Site occurs within Mineral Resource Zone MRZ-2 as adopted by the State Mining and Geology Board and as identified in the City's General Plan, Figure NRC-3. The primary goal of mineral resource classification is to identify regionally significant mineral deposits in an effort to conserve and develop them for anticipated aggregate production needs of the region. 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. By statute, the Board does not utilize existing land uses as a criterion in its classification of Mineral Resources Zones. Based on the urbanized location of the site and its size, mining would not be feasible and therefore the Proposed Project would not result in the loss or availability of a known mineral resource that could be developed.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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XII. NOISE – Would the project result in:

- | | | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a) Exposure of persons to or generation of noise levels in excess of standards established in the City's General Plan or Development Code, or applicable standards of other agencies? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Exposure of persons to or generation of excessive groundborne vibration or groundbourne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) For a project located within an airport land use plan or Airport Influence Area, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Other: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion:

- a) Noise can be measured in the form of a decibel (dB), which is a unit for describing the amplitude of sound. The predominant rating scales for noise in the State of California are the Equivalent-

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Continuous Sound Level (L_{eq}), and the Community Noise Equivalent Level (CNEL), which are both based on the A-weighted decibel (dBA). L_{eq} is defined as the total sound energy of time-varying noise over a sample period. CNEL is defined as the time-varying noise over a 24-hour period, with a weighting factor of 5 dBA applied to the hourly L_{eq} for noises occurring from 7:00 p.m. to 10:00 p.m. (defined as relaxation hours) and 10 dBA applied to events occurring between 10:00 p.m. and 7:00 a.m. defined as sleeping hours). The State of California's Office of Noise Control has established standards and guidelines for acceptable community noise levels based on the CNEL and L_{dn} rating scales. The purpose of these standards and guidelines is to provide a framework for setting local standards for human exposure to noise. Residential development, schools, churches, hospitals, and libraries have a normally acceptable community noise exposure range of 60 dBA CNEL to 70 dBA CNEL. Industrial development, manufacturing, and warehousing, have a normally acceptable community noise exposure range of 70 dBA CNEL to 80 dBA CNEL. Office buildings, businesses and professional have a normally acceptable community noise exposure range of 67 dBA CNEL to 77 dBA CNEL.

The major noise source for the site and surrounding area is the I-215 Freeway. Noise measurements conducted as part of the City's General Plan Update EIR indicate specific measurements along the I-215 Freeway between Orange Show Road and Inland Center Drive to be 65 dBA CNEL at a distance of 1,050 feet, and 70 dBA CNEL at a distance of 487 feet from the freeway centerline. According to the proposed site plan, the LLUHSB Campus is proposed at a distance of over 500 feet from the freeway centerline. Therefore, staff, students and visitors at the campus could be exposed to noise levels in excess of State and City established standards. The building would be designed to meet or exceed California Building Code Standards. Health and Safety Code, Division 107, Part 1 and Part 7, assigns the responsibility for developing architectural, structural, mechanical, electrical, plumbing and fire and panic safety building standards for hospital and medical care facilities to the Office of Statewide 42 Health Planning and Development. Therefore a less than significant impact is anticipated.

- b) Construction and post-construction activities of the proposed LLUHSB Campus would not require the use of equipment that would generate excessive ground borne vibration or ground-borne noise levels. No impact would result.

- c,d) The Proposed Project is anticipated to generate short-term construction noise. The project is not anticipated to expose people to noise levels or generate noise levels in excess of standards established in the City's General Plan or Development Code. The nearest sensitive receptors, four single-family residences located approximately 450 feet southeast of the Project Site, would not be exposed to excessive project-related noise levels, as "G" Street and the San Manuel Stadium, greater noise generators, would continue to pose more of a noise impact than construction of the project. Similarly, no significant long-term project impacts are anticipated because education and medical/care facilities are not associated with excessive noise generation. The following mitigation measure is recommended to ensure short-term construction noise impacts are less than significant.

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N-1: All construction activities shall be limited to the hours of 7:00 a.m. to 7:00 p.m., Monday through Saturday. Additionally the following requirements shall be imposed in order to further mitigate the impacts of noise.

- All construction vehicles shall have mufflers and be maintained in good operating order at all times.
- All trucks waiting to be loaded or unloaded with construction material and or/during operation of the facility shall not be left to idle for more than 10 minutes.

e) As shown in Figure LU-4 of the City's General Plan, the Project Site does not occur within the San Bernardino International Airport (SBIA) Influence Area. Therefore, no impacts from aircraft noise would result to employees, students or clients of the proposed campus facilities.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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XIII. POPULATION AND HOUSING – Would the project:

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|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Induce substantial 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)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Remove existing housing and displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Other: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion:

- a) The Project includes the development of an approximate 150,000 square-foot medical office building with associated educational services (i.e., classrooms and laboratories) on a 7.24-acre site. The LLUHSB campus is estimating to have approximately 300 staff members, and an additional 100 to 200 resident/medical students at any one time. The addition of 300 new jobs and 200 students would not induce a substantial population growth in the area. According to the General Plan Draft EIR Table 5.11-2, in 2025 the City of San Bernardino is projected to have a high level of jobs-to-households ratio, which reflects the fact that San Bernardino is and would continue to be a center for employment. The City currently houses an international airport and major educational institutions, and is the home of significant government offices (County of San

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Bernardino, County Court House, Caltrans, Federal, etc.) and regional transportation facilities (railroads, airport, and freeways). There are numerous related businesses that locate within the City to be near these uses. Build-out of the proposed General Plan accounts for these existing uses and potential businesses.

Further, the Project is an in-fill development, and is located within a redevelopment area. The Project would connect to existing water and sewer lines that currently service the area and would not require the extensive construction of any new infrastructure. The project's growth is anticipated in the City of San Bernardino General Plan. No adverse impact is anticipated.

- b) The Project Site is currently vacant. No impacts to existing housing would result.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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XIV. PUBLIC SERVICES

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| a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Fire protection, including medical aid? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Police protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Schools? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Parks or other recreational facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Other governmental services? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Other: | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Discussion:

- a) Fire Protection: The City of San Bernardino Fire Department provides fire protection and emergency medical services to the Project Site and vicinity. The Fire Department provides emergency medical care (with emergency medical team personnel and paramedics), "HazMat" (hazardous materials) teams and resources, and aircraft rescue and fire fighting services. The Fire Department also conducts fire safety inspections of businesses, and educates the public about safety measures through school and disaster preparedness programs.

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The City of San Bernardino has a mutual aid agreement with the County of San Bernardino and the California Department of Forestry for local fire protection. The State currently is providing funding and operational assistance via the State Chaparral Management and Forest Stewardship Programs to reduce hazardous fuel accumulations, improve important wildlife habitat, and enhance watershed value.

The City of San Bernardino Fire Department nearest station to the Project Site is Fire Station No. 230, located at 502 South Arrowhead Avenue, less than one-mile southeast of the Project Site. The City's adopted response time standard is five minutes or less for 90 percent of the emergency calls for service.

Since the nearest fire station is located less than one-mile from the Project Site and since the Project Site is an in-fill development within an established commercial area, implementation of the Proposed Project would not have a significant impact on fire service response times. Developer impact fees are collected at the time of building permit issuance and therefore, impacts are considered less than significant.

Police Protection: The City of San Bernardino Police Department provides law enforcement services for businesses and residences within the city limits. The City of San Bernardino is divided into five Districts. The Project Site is located in the Southern District. The police substation nearest the Project Site is located at 204 Inland Center Mall. All emergency calls and requests for service from the Project Site would be dispatched from the main police station at 710 North D Street. As crime and calls for service change over time, the District's boundaries and staffing assignments are evaluated to maintain a balance of service across the City. Staffing for the department is not based on a particular ratio of "officers per thousand" but is determined to provide the ability to conduct proactive community-oriented policing and problem solving.

The Proposed Project would develop a currently vacant site with an approximate 150,000 square-foot medical office building with related educational services. The on-site parking area would be illuminated for security purposes. The City of San Bernardino Police Department reviews staffing needs on a yearly basis and adjusts service levels as needed to maintain an adequate level of public protection. Similarly, developer impact fees are collected at the time of building permit issuance to offset project impacts. Therefore, impacts to law enforcement are anticipated to be less than significant.

Schools: The Project Site is located within the boundary of the San Bernardino City Unified School District. As determined in the General Plan Update EIR, build-out of the City would result in a substantial increase in student population, which would require additional school facilities and personnel. The report concluded that upon implementation of General Plan policies, regulatory requirements, and standard conditions of approval, the impact to school services would be less than significant. Construction and operation of new school facilities would be funded through school impact fees assessed on new developments that occur within the school district.

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Implementation of the project would generate 100 to 200 students. It is anticipated that students would come from either California State University San Bernardino or the Loma Linda University in Loma Linda, and therefore no impact is anticipated.

Parks: There are a total of 52 developed parks and recreational facilities in the City, encompassing approximately 540 acres. Based on the adopted park standard of five acres per 1,000 residents, build-out of the City would result in a need for approximately 1,596 acres of parkland. The General Plan Update designates 469 acres of public parks. Therefore, future build-out would result in a shortfall of 1,127 acres. However, the projected shortfall is lessened somewhat because parkland total areas do not include the three regional parks, which total 158 acres. Additionally, many school sites, community centers and senior centers throughout the City are available for recreational activities. Furthermore, the City designates approximately 620 acres of undeveloped open space parkland and 664 acres of public and commercial recreation, which includes private recreational facilities, and an additional 1,312 acres of undeveloped open space and parkland and 57 acres of public and commercial recreation in the Sphere of Influence areas. Implementation of policies listed in the Parks and Recreation Element of the General Plan Update, and collection of developer impact fees would ensure impacts to parks are less than significant. Although the Project would generate approximately 300 new jobs and provide services for up to 200 students, no project-related population increase is anticipated and therefore the Project would not result in the need for additional parks. No impact would result.

Government Services: The proposed development would not require the use of governmental services beyond the approval and permitting process. The Proposed Project is consistent with the General Plan and would promote and utilize the services within the TD Zone. Therefore, no impact is anticipated.

Solid Waste: The Proposed Project would be served by the City of San Bernardino Integrated Waste Management Division, which provides collection services to residential and commercial customers for refuse, recyclables, and greenwaste. Recycle and green waste are taken to materials recovery facilities (MRF) operated by Republic Services Inc. and Burrtec Waste Industries.

According to the California Integrated Waste Management Board's estimated solid waste generation rates for medical office buildings and educational facilities, the Proposed Project is expected to generate approximately three (3) tons per day. The proposed LLUHSB Campus development would not generate a significant amount of additional solid waste into the City's waste stream. The solid waste collection system would not be significantly affected by the development of the Project Site.

Maintenance of Public Facilities: The additional amount of traffic generated by the Proposed Project is 4,336 daily vehicle trips, 287 of which would occur during the morning peak hour and 428 of which would occur during the evening peak hour. The project proponent would be required to pay fees established by the Public Works division to minimize impacts to public

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roads (refer to Section XVI Traffic and Circulation of this Initial Study). Therefore, potential impacts to maintenance of local roads are anticipated to be less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XV. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Other:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a) As discussed in Section XIV Public Services of this Initial Study, the Proposed Project would not induce residential development and would not significantly increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of any facilities would result. Implementation of policies listed in the Parks and Recreation Element of the General Plan Update, and collection of developer impact fees would ensure impacts to recreational facilities are less than significant.
- b) The Project does not include recreational facilities. No impact from the construction or expansion of existing recreational facilities would result.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XVI. TRANSPORTATION/TRAFFIC – Would the project:				
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?				
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Result in inadequate parking capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Other:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a-b) On May 30, 2014, Kunzman Associates prepared a Traffic Impact Analysis (TIA) for the Proposed Project. Existing intersection traffic conditions were established through morning and evening peak hour traffic counts obtained by Kunzman Associates, Inc. in May 2014. In addition, truck classification counts were conducted at the study area intersections. The existing volumes and types (number of axles) of trucks was used in the conversion of trucks to Passenger Car equivalent. Project traffic volumes for all future projections were estimated using the manual approach. Trip generation has been estimated based on the Institute of Transportation Engineers, Trip Generation, 9th Edition, 2012.

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The definition of an intersection deficiency has been obtained from the City of San Bernardino General Plan. The General Plan states that peak hour intersection operations of Level of Service (LOS) D or better are generally acceptable. Therefore, any intersection operating at LOS E to F would be considered deficient. For freeway facilities, the definition of deficiency is based on maintaining a level of service standard of LOS E or better, except where an existing LOS F condition is identified. A deficiency is, therefore, defined as any freeway segment operating or projected to operate at LOS F.

The identification of significant impacts is a requirement of CEQA. The City of San Bernardino General Plan and Circulation Element have been adopted in accordance with CEQA requirements, and any roadway improvements within the City of San Bernardino that are consistent with these documents are not considered a significant impact, so long as the project contributes its "fair share" funding for improvements. A traffic impact is considered significant if the project both: 1) contributes measurable traffic to, and 2) substantially and adversely changes the level of service at any off-site location projected to experience deficient operations under foreseeable cumulative conditions, where feasible improvements consistent with the City of San Bernardino General Plan cannot be constructed.

Existing intersection traffic conditions were established through morning and evening peak hour traffic counts. Explicit peak hour factors have been calculated using the data collected for this effort as well. The morning and evening peak hour traffic volumes were identified by counting the two-hour periods from 7:00 a.m. – 9:00 a.m. and 4:00 p.m. – 6:00 p.m. The existing delay and LOS for intersections in the vicinity of the project currently operate at LOS C or better during the peak hours for existing traffic conditions.

Trip generation rates were determined for daily traffic and morning peak hour inbound and outbound traffic, and evening peak hour inbound and outbound traffic for the proposed land use. By multiplying the trip generation rates by the land use quantity, the traffic volumes are determined. Based upon discussions with the City of San Bernardino staff and the applicant, a mode shift reduction (15 percent) and teaching clinic reduction (5 percent) have been applied to the project trip generation. As shown in Table 5, the proposed LLUHSB Campus is projected to generate approximately 4,336 daily vehicle trips, 287 of which would occur during the morning peak hour and 428 of which would occur during the evening peak hour.

**Table 5
Project Trip Generation¹**

Land Use	Quantity	Units ²	Peak Hour						Daily
			Morning			Evening			
			Inbound	Outbound	Total	Inbound	Outbound	Total	
Trip Generation Rates									
Medical Office		TSF	1.89	0.50	2.39	1.00	2.57	3.57	36.13
Trips Generated									
Medical Office	150.0	TSF	284	75	359	150	386	536	5,420
Mode Shift Reduction 15% ³			-43	-11	-54	-23	-58	-81	-813
Teaching Clinic Reduction 5% ⁴			-14	-4	-18	-8	-19	-27	-271
Total			227	60	287	119	309	428	4,336

¹ TSF = Thousand Square Feet

² Source: Institute of Transportation Engineers, Trip Generation, 9th Edition, 2012, Land Use Category 720.

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- ³ Source: City of Los Angeles, Traffic Study Policies & Procedures, June 2013, Transit Credits page 10. Due to the location of the Proposed Project and availability of bus and rail services in the area, transit usage by project employees and patrons can be expected. The 15 percent mode shift reduction is assumed to represent the potential transit ridership as well as pedestrian and bicycle trips. The San Bernardino Transit Center preliminary design is included in Appendix F. This future multimodal transit center is currently under construction. It will serve Southern California's Metrolink and as a major connection terminal connecting all of Omnitrans bus lines as well as the MARTA and Victor Valley Transit Authority. Pedestrian sidewalks and crosswalks are provided between the Project Site and the transit center.
- ⁴ Based upon discussions with the applicant, a "conservative" 5% reduction of the trip generation accounts for patients often having 2+ hour long visits that might include multiple specialties.

The Project does not contribute trips greater than the freeway threshold volume of 100 two-way peak hour trips to the I-215 Freeway. The Project contributes trips greater than the arterial link threshold volume of 50 two-way trips in the peak hours on intersections outside of the City of San Bernardino. Therefore the City of San Bernardino must notify the California Department of Transportation. This agency must also be provided with a copy of the TIA, once the document is accepted by the City of San Bernardino. The purpose of this notification is to allow the California Department of Transportation to identify opportunities to make improvements to intersections concurrent with adjacent development, at considerably less cost and disruption than would occur if it were done after-the-fact.

To ensure potential impacts to traffic and circulation are reduced to a less than significant level, the following mitigation measures shall be implemented:

On-Site Improvements

- TC-1: On-site improvements and improvements adjacent to the site shall be required in conjunction with the proposed development to ensure adequate circulation within the Project itself (see TIA Figure 29).**
- TC-2: Sight distance at project access shall comply with standard California Department of Transportation and City sight distance standards. The final grading, landscaping, and street improvement plans shall demonstrate that sight distance standards are met. Such plans must be reviewed by the City and approved as consistent with this measure prior to issue of grading permits.**
- TC-3: On-site traffic signing and striping shall be implemented in conjunction with detailed construction plans for the project.**

Off-Site Improvements

- TC-4: Construct "G" Street from Valley Street to the south project boundary at its ultimate half-section width including landscaping and parkway improvements in conjunction with development, as necessary.**
- TC-5: Construct Valley Street from the west project boundary to "G" Street at its ultimate half-section width including landscaping and parkway improvements in conjunction with development, as necessary.**

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TC-6: The Project Proponent shall contribute towards the cost of necessary freeway mainline improvements on a fair share or "pro-rata" basis if a California Department of Transportation funding mechanism becomes available.

TC-7: As is the case for any roadway design, the City of San Bernardino shall periodically review traffic operations in the vicinity of the project once the project is constructed to see if traffic operations are satisfactory.

Implementation of Mitigation Measures TC-1 through TC-7 would ensure potential impacts from Project-related traffic are reduced to a less than significant level.

- c) As shown in Figure LU-4 of the City's General Plan, the Project Site does not occur in the San Bernardino International Airport Influence Area. No impacts to air traffic patterns, including either an increase in traffic levels or a change in location would result.
- d) The Proposed Project would not substantially increase hazards due to a design feature, as there are no proposed sharp curves or creation of any dangerous intersections. In addition, the Project is a permitted use as outlined in the City's General Plan Land Use Element and would be consistent with surrounding land uses and would not result in any incompatible uses. No significant impacts are anticipated.
- e) Project implementation would not impact emergency access. Access to the site is proposed along "G" Street with secondary access along West Valley Street. Site plans are reviewed by the City Fire Department to ensure adequate access for fire apparatus is provided. No significant impacts are anticipated.
- f) According to Table 19A.02 Required On-Site Parking of the City's Development Code, the Proposed Project is required to provide 302 parking spaces. The site plan allocates a total of 431 parking spaces. With an excess of 129 parking spaces, no impacts from inadequate parking spaces would result.
- g) The Proposed Project would not conflict with existing policies regarding alternative transportation and no impact is anticipated. No increased hazards to bicyclists or pedestrians would result. In accordance with Chapter 19.19A TD Zone, the City's Development Code, one bicycle parking space shall be provided for each ten automobile parking spaces provided. No significant impacts to alternative transportation would result.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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XVII. UTILITIES AND SERVICE SYSTEMS –

Would the project:

- a) Exceed wastewater treatment requirements of

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	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
the Santa Ana Regional Water Quality Control Board?				
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Other:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion:

a,b,e) The Proposed Project would be served by the City of San Bernardino sewer system, which has wastewater treated by the San Bernardino Water Reclamation Plant (SBWRP). The Proposed Project would generate wastewater that can be discharged to a municipal system with sufficient capacity. The SBWRP is a regional plant that serves a larger population than just the City of San

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Bernardino (Loma Linda, Highland and San Bernardino International Airport). The existing flow to the SBWRP of 28 MGD could be expected to increase cumulatively by 20.2 MGD for a total flow of 48.2 MGD. This amount would exceed the existing design capacity of 33 MGD by 15.2 MGD. Additional facilities would need to be built or expansion of existing facilities would need to be completed to accommodate the proposed build-out in the service area of the SBWRP. However, the current (2014) available capacity at the plant is approximately 10 MGD.

The wastewater collection system is currently experiencing deficiencies and the Wastewater Collection System Master Plan report of 2002 predicted an increase in system pipe capacity deficiencies of 57,022 out of 750,718 linear feet of pipe by the year 2025. That report was not based on the build-out projections presented in the General Plan update EIR.

Mitigation presented in the City's General Plan Update EIR requires the City to update the Wastewater Collection System Master Plan to reflect General Plan Update build-out statistics, review treatment facility capacity periodically and adjust Sewer Capacity Fees when appropriate in consultation with participating communities to accommodate construction of new or expanded wastewater treatment and collection facilities.

Based on data provided by the applicant the average domestic water requirement for the project is projected to generate 79,200 gallons per day (gpd) of wastewater flow (based on a water demand of 105,600 gpd) This flow, representing approximately 0.8 percent of the currently available treatment plant capacity could be accommodated with existing capacities of both the sewer system and the SBWRP. The project is consistent with the General Plan and would be required to meet the requisites of the City of San Bernardino and the Santa Ana Regional Water Quality Control Board regarding wastewater quality. Impacts are considered less than significant.

- c) Storm drains and flood control facilities within the planning area include natural and man-made channels, storm drains, street waterways, natural drainage courses, dams, basins, and levees. Storm drain and flood control facilities are administered by the City of San Bernardino, San Bernardino County Flood Control District, ACOE, and the San Bernardino International Airport and Trade Center. Design and construction of storm drain and flood control facilities are the responsibility of the City Public Works Department. The Proposed Project would not require the construction of new storm water facilities. As discussed with the City, stormwater would be controlled on-site through construction of a series of bio-retention basins (see Section IX of this Initial Study for a detailed discussion of the proposed on-site storm water system). Details of the system would be reviewed and approved by the Public Works Staff. No impacts are anticipated.
- d) The San Bernardino Municipal Water Department (SBMWD) provides domestic water service in the City. The SBMWD serves an area of approximately 43 square miles with 35,246 service connections. The Department produces over 497 gallons per capita per day, with the average metered consumption of 330 gallons per capita per day. Currently, the SBMWD available groundwater supply is approximately 49,460 acre-feet per year or 16.1 billion gallons per year.

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The San Bernardino Valley Municipal Water District (SBVMWD) was formed in 1954 to plan long-range water supply for the San Bernardino Valley. It imports water into its service area through participation in the California State Water Project and manages groundwater storage within its boundaries. SBVMWD covers about 325 square miles and includes the cities and communities of San Bernardino, and other cities within the region.

Based on data provided by the applicant's engineer, the project would have a water demand of approximately 105,600 gallons per day. The project's water supply requirements would be assessed during project review and approval. The applicant would be required to pay fees for service to the SBMWD. No impact is anticipated.

- f/g) The Proposed Project would be served by the City of San Bernardino Refuse & Recycling Division, which provides solid waste collection services to residential and commercial customers for refuse, recyclables, and greenwaste. Materials that are not recycled in compliance with the Intergrated Waste Management Act (AB 939) are taken to one of two regional landfills in the valley (San Timoteo: permitted until 2026 or Mid-Valley: permitted until 2033). According to the California Integrated Waste Management Board's estimated solid waste generation rates for hotels, the Proposed Project is expected to generate approximately three (3) tons per day. Proposed development would not generate a significant amount of additional solid waste into the City's waste stream. The San Timoteo and Mid-Valley sanitary landfills are permitted to receive 1,000 tons per day and 7,500 tons per day, respectively. Estimated project-generated waste represents approximately 0.3 percent and 0.04 percent of the total permitted waste received at these landfill facilities, respectively. The solid waste collection system would not be affected by the development of the Project Site.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

- | | | | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <p>a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of major periods of California history or prehistory?</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <p>b) Does the project have impacts that are</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

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

Discussion:

- a) Critical habitat identifies specific areas that are essential to the conservation of a listed species and, with respect to areas within the geographic range occupied by the species. Records of observation for sensitive species were retrieved from the California Natural Diversity Data Base (CNDDDB) on May 30, 2014 for the San Bernardino South and Redlands USGS 7.5-minute quadrangles. The CNDDDB does not report past observations of sensitive species at the Project Site or in its vicinity. According to the City of San Bernardino General Plan Land Use Map, the site is designated Central City South-1 and not within an area designated as having the potential for sensitive wildlife (General Plan Figure NRC-1). During a recent site visit conducted in May 2014, the site did not support any sensitive wildlife habitat. Although adjacent to a City-owned v-ditch, there were no riparian habitat or other sensitive natural communities observed on-site. Therefore, it is anticipated that no impacts to any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service would result.

According to Figure 5.4-2 of the City of San Bernardino’s General Plan EIR, the site occurs within the Urban Archaeological District and has the potential to contain historical resources. However, the site is outside of the area of concern for archeological resources.

In May 2014, McKenna et al. prepared a Cultural Resources Investigation for the Project Site. As noted in the report, the project area is located near a branch of Lytle Creek, a fresh water source within the City of San Bernardino and relatively close to the project area (approximately 150 feet southwest of the Project Site). While there is always a potential for buried prehistoric archaeological resources along major water courses, no physical evidence of such resources has been reported in this area and only one prehistoric archaeological resource (Urbita Springs) has been reported within one-mile and this site has since been destroyed. The report tentatively concluded that the project area has a very low level of sensitivity for the identification of prehistoric archaeological resources.

The Project Site is currently vacant with surficial evidence of property clearance. This clearance has been associated with basic site vegetation clearing (weed abatement), but also the result of demolition of previous (pre-1968) commercial improvements. There is no physical evidence of

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any of the earlier property uses. Likewise, no evidence of prehistoric archaeological resources. The property is considered clear of any potentially significant cultural resources. Therefore, the proposed development would not result in any adverse environmental impacts with respect to cultural resources, as no resources were identified within the project area. However, if any sensitive historic or pre-historic artifacts are uncovered during any excavation and construction activities, a qualified archaeologist should be contacted for evaluation of the deposits. Mitigation Measures CR-1 through CR-3 within this Initial Study would reduce any potentially significant impacts to cultural resources to a less than significant level.

- b) Impacts associated with the Proposed Project would not be considered adverse or unfavorable. The project is not anticipated to generate significant amounts of air pollutants; however it would generate short-term construction noise. The project is not anticipated to expose people to noise levels or generate noise levels in excess of standards established in the City's General Plan or Development Code. The nearest sensitive receptors, four single-family residences located approximately 450 feet southeast of the Project Site, would not be exposed to excessive project-related noise levels, as "G" Street and the San Manuel Stadium, greater noise generators, would continue to pose more of a noise impact than construction of the project. Mitigation measures contained within this Initial Study would ensure short-term construction noise impacts would be reduced to a less than significant level. No significant cumulative adverse impacts are expected with implementation of the proposed development, as the majority of the area is developed. No impact is anticipated.
- c) The development of the site as proposed would not cause adverse impacts on humans, either directly or indirectly. In September 2013, an Asbestos Abatement Project Report was prepared for the Project Site by Masek Consulting Services, Inc. The report concluded that at the time buildings were demolished on-site (circa 1968) and also on adjacent properties (date unknown), asbestos abatement was not required. An asbestos debris pile, mostly located on the property to the south, was spread and extended to the Project Site when the drainage channel (west of the Project Site) was constructed. Given the extensive investigation and asbestos abatement, it is unlikely that asbestos material would be encountered on-site, however in the event additional material is discovered during excavation for the building and parking lot, implementation of Mitigation Measure HW-1, within this Initial Study, would ensure potential impacts are reduced to a less than significant level.

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REFERENCES. The following references cited in the Initial Study are on file in the Development Services Department.

1. San Bernardino General Plan, November 1, 2005.
2. Draft San Bernardino General Plan Update and Associated Specific Plans EIR, The Planning Center, July 25, 2005
3. City of San Bernardino Development Code
4. South Coast Air Quality Management District, CEQA Air Quality Handbook
5. The Gateway College Traffic Impact Analysis, Kunzman Associates, May 30, 2014.
6. A Cultural Resources Investigation of the Loma Linda University Hospital San Bernardino Campus (Gateway College) Project Area, South "G" Street, San Bernardino, San Bernardino County, CA, McKenna et al., May 2014.
7. Final Geotechnical Investigation Proposed Loma Linda University Medical Building Project Southwest of West Valley Street and South "G" Street, San Bernardino, California., CHJ Consultants, May 20, 2014.
8. Asbestos Abatement Project Report, South "G" Street and Valley, Masek Consulting Services, Inc., September 18, 2013.
9. Water Quality Management Plan Loma Linda University City Campus Medical & Education Office Building, APD Consultants, Inc., May 22, 2014.