

# PLANNING DIVISION INITIAL STUDY

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## CITY OF SAN BERNARDINO FINAL INITIAL STUDY

### PARK WEST ENTERPRISES, INC. dba CO-WEST COMMODITIES CONDITIONAL USE PERMIT

This project proposes to: 1) relocate Co-West Commodities' Food-Industry Wastewater Treatment Plant from the current location at 1389 W. Mill Street, San Bernardino to 2586 Shenandoah Way, San Bernardino; 2) to expand the current business operation. The proposed expansion will include the installation and operation of a renewable energy anaerobic digester (AD and also referred to as the biodigester) and a California-regulated Hazardous Waste bulking and transfer facility. The project site is approximately 5.42 acres with a 63,257 sq.ft. existing building within the IL Zone (Assessor's parcel number is 0266-362-24).

**October 22, 2014**

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**PREPARED FOR:**

Co-West Commodities  
2586 Shenandoah Way  
San Bernardino, CA 92407

**Lead Agency**

City of San Bernardino  
300 North "D" Street  
San Bernardino, CA 92418

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**REVIEWED BY:**

Independently reviewed, analyzed, and exercised judgment in making the determination, by the City of San Bernardino Development/Environmental Review Committee on \_\_\_\_\_, pursuant to section 21082 of the California Environmental Quality Act (CEQA).

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## Table of Contents

General Project Data	5
Project Title	5
Lead Agency	5
Contact Person	5
Project Location.	5
Project Sponsor's Name and Address	5
General Plan/Zoning Designations	5
Description of Project:	5
Project Overview	5
Project Objectives	12
Project Elements	12
Surrounding Land Uses and Setting	22
Other agencies whose approval is required	23
Environmental Factors Potentially Affected	24
Aesthetics	25
Agriculture and Forestry Resources	28
Air Quality	30
Odor Mitigation Measures, Monitoring and Reporting	37-43
Biological Resources	52
Cultural Resources	54
Geology and Soils	56
Hazards and Materials	60
Hydrology and Water Quality	66
Land Use and Planning	71
Mineral Resources	74
Noise	76
Population and Housing	78
Public Services	79
Recreation	81
Transportation/Circulation	82
Utilities	85
Mandatory Findings of Significance	88

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

**List of Figures**

Figure 01 – Regional Map.....8

Figure 02 – Project Area Map.....9

Figure 03 – Site Plan.....10

Figure 04 - Water Treatment System Process Diagram.....11

Figure 05 - Core Operations Wastewater and AD Flow Diagram.....15

Figure 06 - Anaerobic Digester Tank Flow Diagram.....18

Figure 07 – Hazmat Odor Control Floor Plan.....51

Figure 08 – Composite Site Plan.....27

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

**List of Tables**

Table A – Potential Odor Sources and Mitigation/Controls for Proposed Project.....20

Table B - General Plan Designations and Land Uses.....22

Table C - Maximum Daily Unmitigated Construction Emissions from Equipment  
Delivery and Assembly (2014), lbs/day.....33

Table D - Maximum Daily Unmitigated Operational Emissions Summary (2015), lbs/day.....34

Table E - Summary of Health Risks from Stationary Sources.....35

Table F - GHG Generated and Avoided Emissions for the Biodigester Operations.....44

Table G – Recommended Actions for Climate Change Project Summary.....45

Table H – Project Compliance with Greenhouse Gas Emission Reduction Strategies.....48

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

**General Project Data**

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 if an Environmental Impact Report (EIR) must be prepared.

- 1. Project Title:** **Park West Enterprises, Inc. dba Co-West Commodities Food-Industry Wastewater Treatment Plant, Anaerobic Digestion Facility and California Hazardous Waste Bulking & Transfer Facility**
  
- 2. Lead Agency:** City of San Bernardino, Community Development Department  
300North “D” Street, San Bernardino, CA 92418-0001
  
- 3. Contact Person:** Aron Liang, Senior Planner  
(909) 384-5057 x 3332
  
- 4. Project Location:** The proposed project is located within the city of San Bernardino as shown on a regional map in Figure 01. The proposed 5.42 acre project site, shown on Figure 02 as the Project Area Map, is located at 2586 Shenandoah Way, north of University Parkway and west of Interstate 215 and east of the BNSF Railway lines. It is surrounded by other industrial businesses consisting of two logistics distribution warehouses, a foam food tray manufacturer, MARS (a pet food manufacturer), and two empty lots (see **Figure 08** Composite Site Plan). The nearest cross-street is Hallmark Parkway to the east.
  
- 5. Project Sponsor’s Name and Address:**  
  
Co-West Commodities  
2586 Shenandoah Way  
San Bernardino, CA 92407
  
- 6. General Plan/Zoning Designations:** Light Industrial (IL)
  
- 7. Description of Project:**

**7.1 Project Overview**

The proposed project, shown on Figure 03, consists of relocating the existing Food-Industry Wastewater Treatment Plant (hereafter referred to as *Wastewater Treatment Plant*) from 1389 West Mill Street in the City of San Bernardino to the proposed 5.42 acre site, which has an existing 63,257 sq.ft. building and warehouse. In addition to the Wastewater Treatment Plant, the proposed project will expand the current business operation to include the installation and operation of a renewable

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

energy anaerobic digester (also known as the biodigester) and a California-regulated Hazardous Waste bulking and transfer facility (also known as the Hazardous Materials facility).

The new Wastewater Treatment Plant facility, along with the anaerobic digester and bulking and transfer facility, is designed with upgraded state of the art equipment intended to enhance the process, increase efficiencies, and reduce the potential for the emitting of objectionable odors.

In contrast with the existing operations on Mill Street, wastewater treatment processing activities at the proposed site will take place within the existing structure and handling or transfer of meat and poultry by-products will not occur at the proposed site. It should be noted that meat and poultry by-product handling and transfer operations were discontinued and eliminated from the Mill Street site in July 2014.

The proposed project is planned to be constructed in two (2) construction increments to ensure the relocation of Co-West's core operations and the closure of its existing plant are completed in a timely manner. The two (2) increments are planned as follows:

- **Construction Increment "A": Food-Industry Wastewater Treatment Plant** - would include:
  - Improvements to the 17,531 sq.ft. area within the Northeast end of the building designated as the Water Treatment area (part of the non-hazardous waste management unit designated on **Figure 03**). In this area, wastewater from the food industry is stored in tanks, treated and filtered. Additionally, in the northernmost corner of this area, used food-grade cooking oil and grease will be stored and recycled. Treated wastewater is discharged to the municipality's sanitary sewer system. Construction will include minor ADA modifications, new electrical circuits and minor plumbing distribution to respective equipment. See the Water Treatment System Process Diagram (**Figure 04**) for the equipment that will be fabricated for this construction increment. The equipment manifest includes but is not limited to: (2) receiving augers, (4) 21,000 gallon storage tanks, (2) SWECO machines, (2) 5,000 gallon Dissolved Air Flotation (DAF) tanks, (2) ALAR Vacuum Filters, (1) 5000 gallon Sludge Tank, (2) 8,000 Oil Receiving Tanks, (1) 700 gallon, Centrifuge Feed Tank, (2) 21,000 Oil Storage Tanks and (1) J-Filter Press, and (1) 600 gallon Lime Tank. All equipment is detailed for seismic connections. A floor trench system has been installed to capture any run-off and for cleaning. All tenant improvements will be built and permitted under the authority of the City of San Bernardino. Construction staging will occur on the interior of the building in the open warehouse area. The construction of the Wastewater Treatment Plant is independent from and not operationally contingent upon the presence or installation of the Biodigester or the Hazardous Materials facility.

The new Food-Industry Wastewater facility at 2586 Shenandoah Way is projected to be in full operation three (3) months after receiving the Planning Commission's Conditional Use Permit approval.

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

- **Construction Increment “B”: Biodigester and Hazardous Materials Facility** - would include:
  - Increment (B) scope consists of the Biodigester construction and the Hazardous Materials tenant improvements and is anticipated to commence during **1Q2015**. The biodigester is scheduled to be fully operational by **2Q2016** and the Hazardous Materials tenant improvements completed and fully operational by **3Q2016**. These dates are contingent upon Co-West’s obtaining the required permits.
  - New construction of a proprietary anaerobic digestion technology with the capacity to handle 100 tons per day of liquid slurry feedstock generated from the Wastewater Treatment Plant operations. The biodigester system will be constructed outside on the northern edge of the site as shown on Figure 03 Site Plan. The system consists of four (4) tanks and ancillary pumps. The four (4) tanks will be located in accordance with setback requirements provided by the City of San Bernardino as noted in the [Fire] Code Compliance Analysis (see **Appendix 1** for the full analysis report). Site work will involve the demolition of asphalt pavement, the relocation of an existing fire hydrant, and minor excavation of the tank foundation area. Upgraded electrical distribution and routing will be required along with the routing of plumbing lines from the Wastewater Treatment area to the biodigester. Security lighting will also be placed on the existing structure. Construction staging may take place on the southwest corner of the property and arranged so as not to hinder the movement of emergency apparatus.
  - Improvements to 24,557 sq.ft. of the open warehouse floor designated as the Hazardous Waste Bulking and Transfer Area (see **Area 3 of Figure 03**). In this area, six large tanks contain waste products such as oils, wastewater, antifreeze, and water-based paint products. Tank contents and quantities are detailed in the Hazardous Materials Inventory Statement (HMIS) in **Appendix 2**. The construction will consist of the placement of the (6) 20,000 gallon storage tanks in the existing structure which will require seismic anchorage as detailed in the construction documents. Retention curbs will be constructed around the perimeter of the tanks as containment within specified quantities of liquids in the event of any leakage or rupture. Construction staging will occur on the interior of the warehouse area.

CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY

Figure 01 – Regional Map

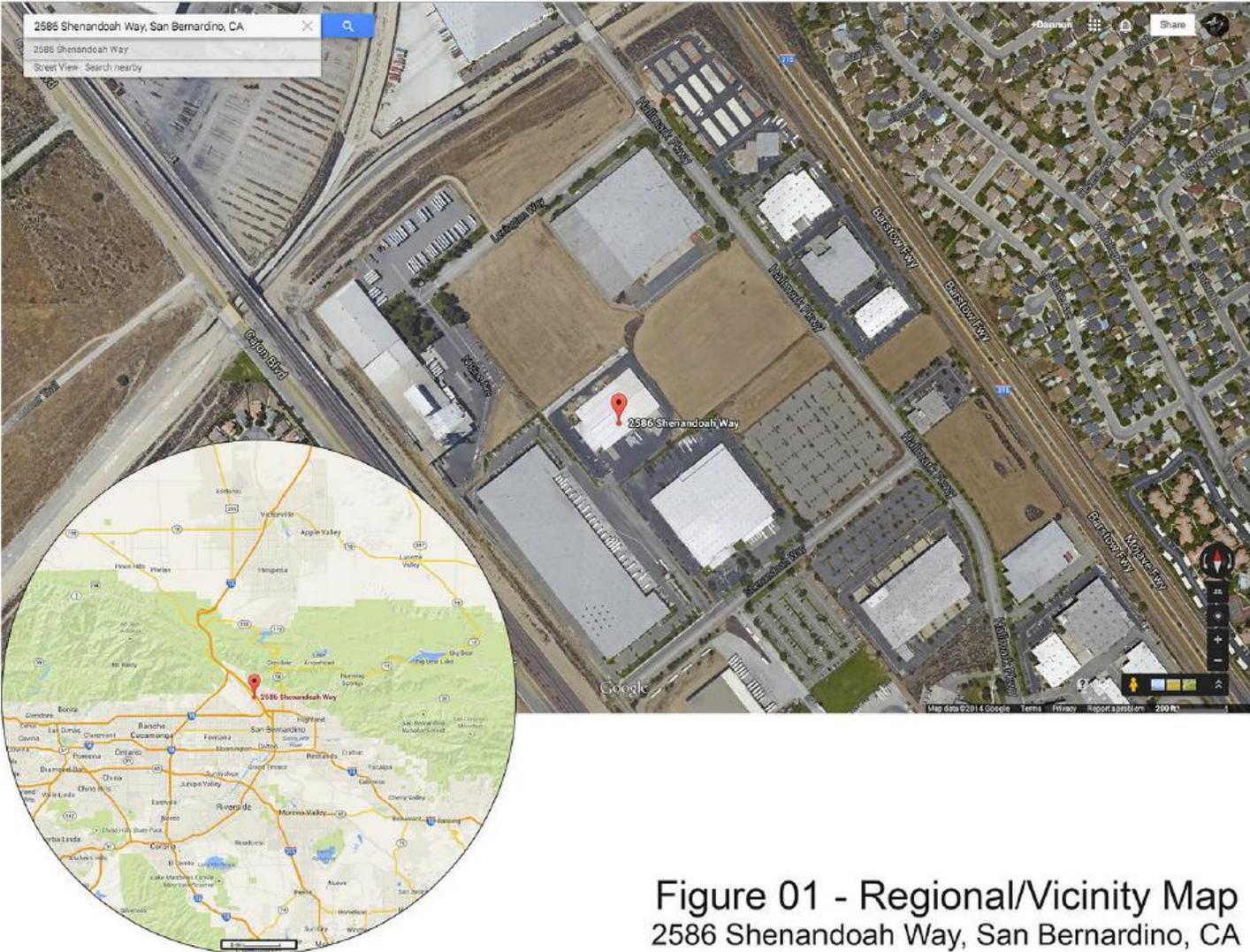


Figure 01 - Regional/Vicinity Map  
2586 Shenandoah Way, San Bernardino, CA





**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

**Fig. 04 – Water Treatment System Process Diagram**

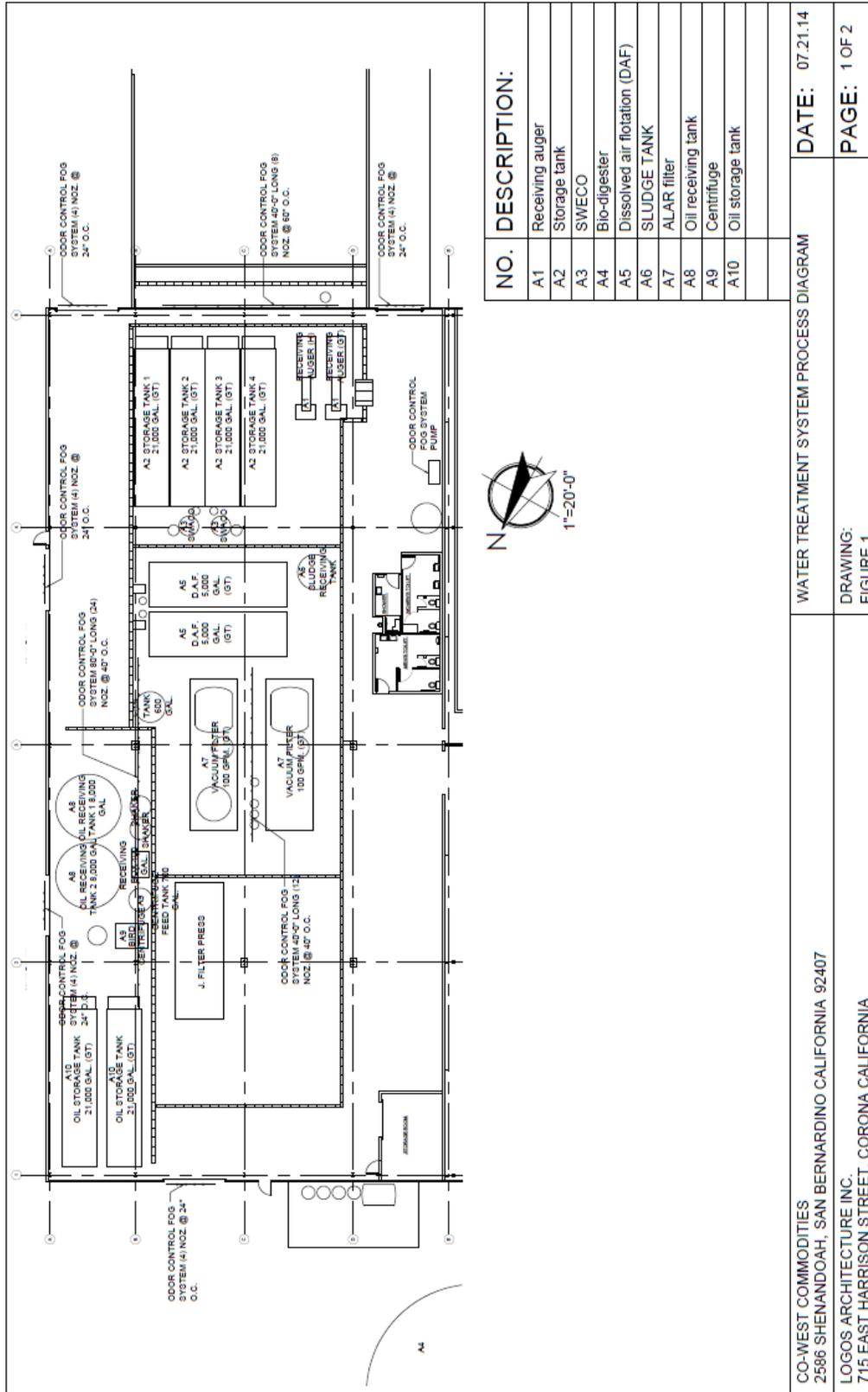


FIGURE 04 -Water Treatment System Process Diagram

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

**7.2 Project Objectives**

The facility would contribute to the following benefits to the overall San Bernardino community:

- **Clean Energy** - Generate up to 1 megawatt (MW) of on-site renewable power
- **Eliminate Odor** Produced by the existing Mill Street Operations;
- **Climate Protection Practices** – Reduction of greenhouse gas emissions; and
- **Recycling and Waste Management** - Reduce waste sent to landfills and municipal sewer.

The objectives of the proposed project are to:

- Create an on-site, renewable energy facility;
- Use processed wastewater (high-strength slurry) produced from Wastewater Treatment Plant to generate renewable energy via the anaerobic digestion of the slurry;
- Mitigate and significantly reduce any odor generated by the treatment of the non-hazardous waste currently collected from the food processing industry;
- Reduce greenhouse gas emissions by using biogas generated by anaerobic digestion at the Co-West facility to generate renewable electric energy; and
- Increase diversion of 2,400 tons of solid waste per year from potential disposal at local landfills.

**7.3 Project Elements**

**7.3.1 Food-Industry Wastewater Treatment Plant Core Operations and Equipment**

As noted in Section 7.1, the proposed project will relocate the primary operations of Co-West’s Wastewater Treatment Plant from the Mill Street site to the proposed project site on Shenandoah Way immediately upon receipt of a Certificate of Occupancy from the City of San Bernardino Building Department authorizing improvements. This is referred to as Construction Increment (A) in Section 7.1. The new storage and processing systems such as wastewater holding tanks, sludge receiving tanks, centrifuges, and SWECO<sup>1</sup> filtration units would be installed within the structure with a minimum capacity to process the 100 tons per day of incoming Food-Industry Wastewater and used, food-grade cooking oil and grease that is currently processed at the Mill Street site. Therefore, the proposed facility is not dependent upon the biodigester or the

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<sup>1</sup> *SWECO is a company that manufactures filtration equipment*

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

Hazardous Materials facility and would operate independently while the other two (2) expanded business operations acquire required permits not previously obtained (see Section 7.3.2)

Core Operations

The core operations to be conducted under the project involve the reclamation of non-hazardous food industry wastewater and yellow and brown grease from cooking oil. The Existing Plant receives and processes one hundred (100) tons per day of used food-grade cooking oil, grease trap wastewater and various other non-hazardous waste streams per day from various food processing facilities. All food-industry wastewater and cooking oil treated and recycled by Co-West is biodegradable. The following is a list of all non-hazardous waste to be processed at the new Wastewater Treatment Plant:

1. Food-Industry Wastewater
  - Grease trap wastewater
  - Food-Industry wastewater solids
  - Sludge
  - Food-Industry clarifier wastewater
2. Reclaimed Cooking Oil
  - Used food-grade cooking oil
  - Vegetable oil
  - Fats

The used cooking oil and wastewater will be processed using a series of filtration devices to separate and recover usable fats, oils, grease, and other products prior to discharging treated wastewater to the sanitary sewer system. The proposed relocation of the Wastewater Treatment Plant from the Mill Street site will use the same reclamation process used at the existing facility outlined below with the exception of steps 7 and 8, which is a description of how the wastewater will be further treated in the biodigester (see **Figure 05** Core Operations Wastewater and AD Flow Diagram).

**Step 1:** Wastewater, used food-grade cooking oil and grease collected by trucks will be delivered to the facility for processing.

**Step 2:** Cooking oil will be unloaded to either of two (2) closed aboveground storage tanks. The oil will then be processed in a series of closed SWECO filtration units and closed centrifuges for the removal of solids. The solids will be collected and stored in closed containers prior to being hauled off-site for other uses or landfill. The rendered fats and oils will be directed to closed aboveground storage tanks from which it will be pumped into tankers and sold as viable product.

**Step 3:** Non-hazardous food industry grease trap wastewater collected from various food processing facilities will be delivered to the facility and pumped into a series of closed aboveground storage tanks. The grease trap wastewater will be received via a system of hard-piped connections originating in the truck unloading stations. The grease trap wastewater will first be processed via a receiving auger to perform an initial separation of solids prior to pumping

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

the water into the closed storage tanks. Solids from the receiving auger, typically consisting of plastic, rags, and paper are transferred into closed containers and hauled off-site for other uses or transferred to a landfill.

**Step 4:** From the closed aboveground storage tanks the auger-filtered wastewater will then be pumped to either of two closed-top SWECO filtration systems to further remove fine solid materials from the wastewater. The wastewater will be pumped through the SWECOs for grease recovery.

**Step 5:** Brown grease collected at the SWECO filtration units will be directed to a closed aboveground storage tank for further recycling. The recycled material will be pumped into tankers and later sold as a viable commodity for animal feed.

**Step 6:** During the recycling process a high-strength slurry (HSS) is produced by a proprietary concentration system in the storage tanks.

**Step 7:** The HSS from the SWECO filtration units will be directed through a chopper pump to the biodigester hydrolysis tank as slurried feedstock. The HSS generated during the recycling process will provide a consistent feedstock and will further reduce the potential for odor generation since it will be generated from well defined and known material sources.

**Step 8:** Following processing by the biodigester, the waste stream is directed to a polishing tank. The remaining wastewater from the polishing tank will be directed to a dissolved air flotation (DAF) system for further treatment of the wastewater. All chemical and physical treatment of the wastewater will occur after it has been removed from the biodigester.

**Step 9:** Polymers will be automatically added to the wastewater as it is pumped to the DAF system. The DAF serves to facilitate the floatation of suspended solids, allowing them to accumulate at the surface of the water for removal by skimming plates. Sludge generated by the DAF will be pumped to a closed aboveground sludge receiving tank and pumped back to the storage tanks for concentrating with additional slurry.

**Step 10:** The treated wastewater from the DAF will then be directed to the Alar<sup>2</sup> water filtration system for final polishing prior to discharge to the sanitary sewer system. The Alar water filtration system utilizes a vacuum to pull the wastewater through a calcined diatomaceous earth filter system. The dewatered dry waste is accumulated in closed containers and hauled offsite for vermicomposting.

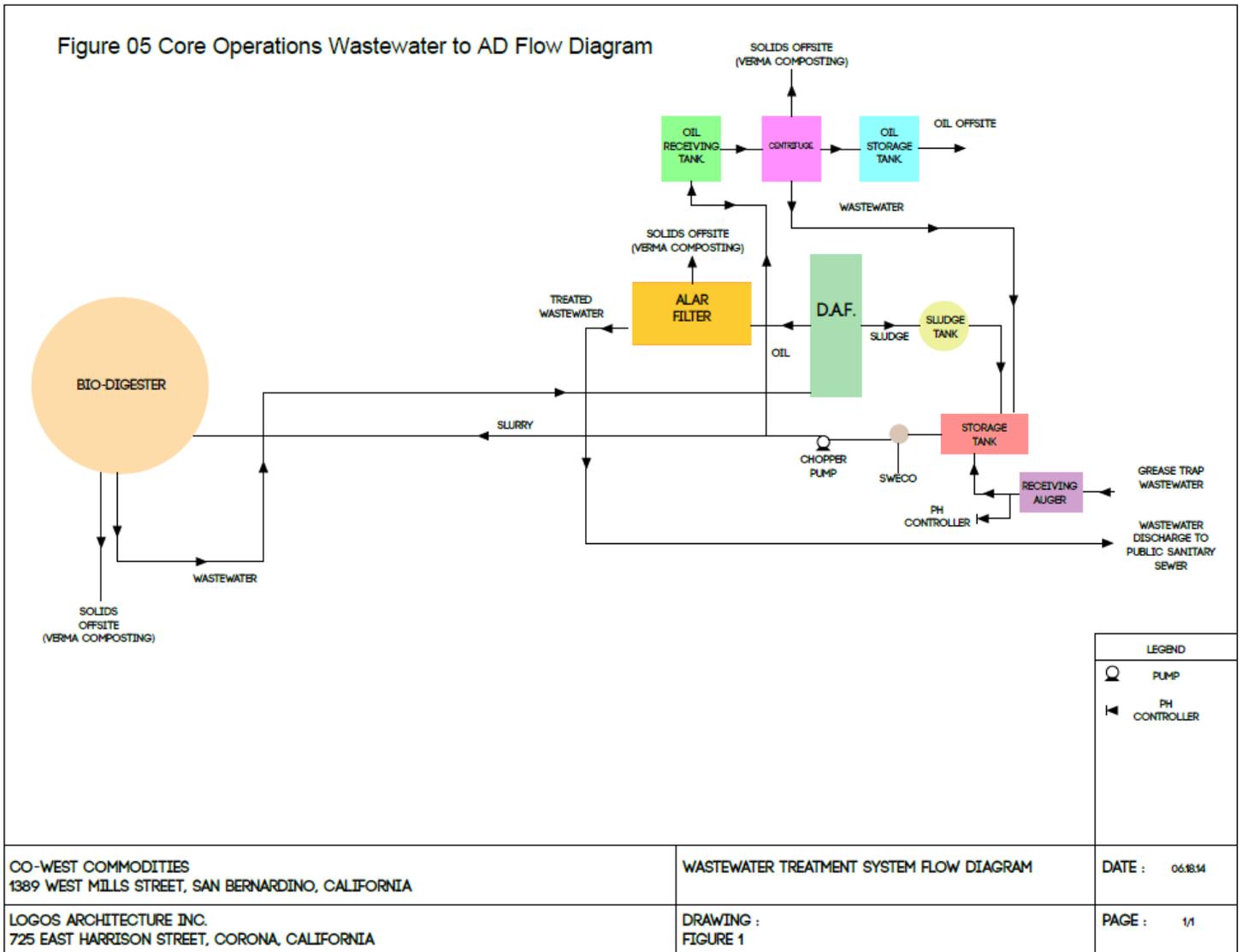
**Step 11:** A closed filter press system will be included as a back-up to the Alar water filtration systems. The closed filter press system is intended to establish additional redundancy in the wastewater treatment system to ensure that wastewater is processed in a timely manner in the event of an issue with the Alar water filtration systems.

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<sup>2</sup> Alar manufactures wastewater treatment equipment

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

**Figure 05 Core Operations Wastewater and AD Flow Diagram**



**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

**7.3.2. Renewable Energy Anaerobic Digester (AD) Processes and Equipment**

As noted in Section 7.1, the biodigester facility would be designed, constructed, and operated with the capacity to handle at least 100 tons per day (TPD) of the HSS feedstock generated from the Wastewater Treatment Plant. **Figure 03** presents a site plan for the proposed biodigester facility. The facility would involve five primary processes: (1) receiving the HSS from the food industry wastewater processing operations through a pump and fully enclosed plumbing system; (2) anaerobic digestion occurring in closed tankage; (3) refinement of biogas; (4) generation of electricity using biogas; and (5) effluent treatment to process and dispose of any solid or liquid byproducts of the anaerobic digestion process. Each of these five processes and associated equipment is described below.

**Material Receiving and Preparation**

The incoming wastes (feedstock) that would be used in the proposed waste-to-renewable energy portion of the project will be the high-strength slurry (HSS) currently produced during the non-hazardous food industry wastewater and used cooking oil treatment process, a proprietary concentration system developed by Co-West. Co-West was the first company to feed its HSS to municipal wastewater treatment plant digesters. It is called *high-strength* slurry because of the drastic increase in the amount of biogas it produces for digesters which in turn create clean, renewable energy. The 100 tons of HSS currently generated at the Co-West plant will continue to be produced with no new materials collected, transported or processed. The HSS generated inside the wastewater treatment plant structure would be pumped into the biodigester tanks outside on the northern edge of the subject site, as shown as **Number(s) 27 on Figure 03** Site Plan, through a chopper pump and closed plumbing system for anaerobic digestion as described below.

**Anaerobic Digestion**

The biodigester system consists primarily of aboveground process tanks and skid-mounted process control equipment. There are four aboveground tanks as shown in Figure 03 and **Figure 06** Anaerobic Digester Tank Flow Diagram: a 300,000 gallon tank, used in the hydrolysis stage of the anaerobic digestion phase and is 47.5 feet in diameter and 23.8 feet tall (shown as **Number 2b in Fig. 06**); a 600,000 gallon tank, used for the methanogenesis stage, which is 50 feet in diameter and 51 feet tall (shown as **Number 2c in Fig. 06**); another 300,000 gallon tank, used for polishing the anaerobic digestion materials, which is 47.5 feet in diameter and 23.8 feet tall, and a 150,000 gallon buffer tank, 39.2 feet in diameter and 19.3 feet tall.

The anaerobic digestion process occurs in two stages so that the acid-forming and methane-forming bacteria are provided the optimal environments to thrive and produce biogas (a combination of principally methane and CO<sub>2</sub>). The first stage (Hydrolysis stage) converts complex organic matter, such as found in the HSS by hydrolytic conversion into simpler organic acids. Some biogas is produced in the first stage; however, this first stage biogas primarily consists of CO<sub>2</sub>. During the second stage (Methanogenesis), organic acids are converted into biogas, which includes methane and CO<sub>2</sub>, as well as water and other end products. The smaller tank is used, if necessary, as a buffer tank between the two stages. The biogas produced in the biodigester tanks will be piped to the biogas

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

refinement system, (shown in **Number 3 of Fig. 06**), under very low pressure. The effluent from the biodigester will be managed both on and offsite (see discussion below).

### **Biogas Refinement**

The biodigestion process produces a variety of different gases, including methane, CO<sub>2</sub>, hydrogen sulfide, hydrogen, nitrogen, and oxygen, intermixed with water. The raw biogas may contain 55 to 65 percent methane, 35 to 45 percent carbon dioxide, and 0 to 2 percent hydrogen by volume and approximately 1,000 ppm of hydrogen sulfide. The biogas refinement system (shown in **Number 3 of Fig. 06**), extracts the hydrogen sulfide, water vapor, and particulate matter from the biogas produced by the anaerobic digestion process. The hydrogen sulfide is absorbed into a carbon material in one of the biogas refinement vessels. The carbon will be changed periodically and hauled off-site for management in accordance with applicable local, State, and federal requirements. The collected water vapor will be recycled back into the process tanks. The purified biogas will be piped to the microturbines for electricity generation or flared in an enclosed flare if the microturbines are not operating.

### **Electricity Generation**

The biogas produced will be used to produce electricity in ultra-low emission microturbines (**shown in Number 4 of Fig. 06**) that have previously been certified by the California Air Resources Board. No biogas storage outside of the headspace in the anaerobic digestion tanks will occur as a result of the operation of the biodigester. The biogas in the anaerobic digestion tanks is under very low pressure, less than one (1) pound per square inch (psi) above atmospheric pressure.

The refined biogas directed to the microturbine will allow for the production of electricity. It is intended that this electricity will be either used onsite for Co-West operations or sold to the electric utility grid.

### **Effluent and Solids Treatment**

Upon completion of the biodigester, Co-West will no longer discharge the HSS into the municipal sewer system nor transport the 2,400 annual tons of solid waste offsite. The HSS generated by the Wastewater Treatment process will be pumped directly to the biodigester to generate biogas and ultimately 1 MW of renewable energy. The biodigester is designed to consume approximately 100 tons per day of HSS and separated solids generated at the site. Of the 100 tons per day of feedstock the anaerobic digestion process will generate approximately 20 to 25 tons of both solid and liquid effluent (also known as digestate). Ten tons of dewatered solid digestate will be generated daily, accumulated in closed containers and hauled offsite for vermicomposting<sup>3</sup>; This will result in lowering greenhouse gas emissions even further inasmuch as vermicomposting is essentially recycles and does not add to the greenhouse gas emissions burden. The remaining tons of liquid digestate will be piped back to the Co-West Wastewater Treatment system for additional treatment prior to permitted discharge to the City of San Bernardino sewer system.

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<sup>3</sup> *Vermicomposting is the process of composting organic matter using various species of worms. The worms breakdown the organic matter into a high nutrient compost material.*

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

**Figure 06 – Anaerobic Digester (AD) Tank Flow Diagram**



Skids



Hydrolysis Tank



Methanogenesis Tank



Biogas Refining



Electrical Generation



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**PLANNING DIVISION**  
**INITIAL STUDY**

**Odor Control**

A comprehensive odor management plan for the entire Co-West project has been prepared and will be implemented at the facility (see **Section IIIe** Air Quality for Odor Mitigation Measures and **Appendix 3**). Although the proposed project involves many of the same types of processing activities as performed at the existing Wastewater Treatment Plant, significant measures will be implemented at the proposed project to significantly reduce the potential for odor generation. Unlike the existing Wastewater Treatment Plant, the operations associated with the proposed project will primarily be conducted within the building in areas specifically designed for the handling of the waste materials that are the most likely sources of odors. Additionally the design of the proposed project is intended to facilitate collection and control of the waste materials and enhance overall housekeeping and maintenance.

**Elimination of Beef and Poultry By-Product Transloading Activity**

Prior to July 2014, the Wastewater Treatment Plant transloaded fresh beef and poultry meat trimmings separated at production plants and supermarkets prior to packaging for human consumption. The beef and poultry by-products were transported into the plant in containers (barrels and bins) which were unloaded from the truck and dumped into an end dump trailer which was delivered to a rendering plant for further processing. The plant did not process or treat the beef and poultry by-products however transloading may have been a significant source of the odors which emanated from the plant despite the fact that most of the beef and poultry by-products that were received was fresh from the same day's production and were transloaded and delivered to the rendering plant within a few hours of being received by the existing Mill Street plant.

Co-West has ceased transloading beef and poultry by-products as a conscious business decision to mitigate potential sources of odor. In lieu of transloading the meat trimmings, effective in July 2014, Co-West diverts all of the meat by-products directly to the rendering plant which was the ultimate delivery point of the transloading process. Transloading beef and poultry by-products will no longer be a part of the business model and will not be a part of the proposed project. The elimination of the on-site handling of beef and poultry by-products has resulted in significant improvements regarding the potential generation of odors at the existing Wastewater Treatment Plant.

With the proposed project a series of odor mitigation measures will be implemented, including the use of an odor neutralizing fogging system (see **Figure 04** and **Figure 07**) - the use of which does not require any additional permitting or approvals from local, regional, or State agencies. The mitigation measures are discussed in detail in the comprehensive odor management plan contained in **Appendix 3**, and summarized in the following table, **Potential Odor Sources and Mitigation/Controls for Proposed Project**.

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

**Table A\_\_ Potential Odor Sources and Mitigation/Controls for Proposed Project**

No.	Description	Process	Mitigation/Control	Odor Significance*	
				Uncontrolled	Controlled
1	Cooking oil, food grade	Storage Filtration Transfer	Carbon adsorption on tank vents Indoor storage and processing Closed storage and processing systems Maintenance and housekeeping protocols Odor neutralizers/fogging system	Medium	Low
2	Tallow	Not processed at site	None required	None	None
3	Vegetable oil	Storage Filtration Transfer	Carbon adsorption on tank vents Indoor storage and processing Closed storage and processing systems Maintenance and housekeeping protocols Odor neutralizers/fogging system	Medium	Low
4	Fats	Storage Filtration Transfer	Carbon adsorption on tank vents Indoor storage and processing Closed storage and processing systems Maintenance and housekeeping protocols Odor neutralizers/fogging system	Medium	Low
5	Grease trap wastewater	Storage Solids separation Filtration Dissolved air flotation	Carbon adsorption on tank vents Indoor storage and processing Closed storage and processing systems Maintenance and housekeeping protocols Odor neutralizers/fogging system	Medium	Low
6	Food industry wastewater solids	Storage Solids separation Filtration Dissolved air flotation	Carbon adsorption on tank vents Indoor storage and processing Closed storage and processing systems Maintenance and housekeeping protocols Odor neutralizers/fogging system	Medium	Low
7	Food industry clarifier wastewater	Storage Solids separation Filtration Dissolved air flotation	Carbon adsorption on tank vents Indoor storage and processing Closed storage and processing systems Maintenance and housekeeping protocols Odor neutralizers/fogging system	Medium	Low

\*Odor significance based on estimated potential to create an odor nuisance pursuant to SCAQMD Rule 402.

Additionally, the comprehensive odor management plan contains protocols for odor surveillance and response to potential odor concerns expressed by off-site receptors. The Odor Surveillance Protocol establishes procedures to enhance compliance and to establish a mechanism for the facility to actively monitor the area surrounding the proposed project for potential odor issues. By initiating a proactive surveillance program to identify detectable levels of odors in the surrounding community the facility will be better able to address issues before they become problems.

Similarly, the Odor Response Protocol establishes procedures to enhance compliance and to establish a systematic response in the event that an air quality or odor complaint is received by Co-West and notification of complaints received by any regulatory agency that is reported to Co-West.

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

To further enhance its efforts to mitigate, eliminate, and otherwise address potential odor concerns, Co-West is willing to provide periodic summaries of its efforts related to the implementation of the Odor Surveillance Protocol and Odor Response Protocol to the City of San Bernardino.

**7.3.3. Waste Bulking and Transfer Processes (California-regulated Hazardous Waste)**

The proposed project also includes two additional waste management units for the bulking and transfer of California-regulated hazardous waste. The waste streams to be received for bulking and transfer primarily consist of water based liquids that may or may not contain oils and greases. Some solids including oily sludges may also be bulked at the facility. This bulking and transfer process will occur in the designated area shown as **Number 3 in Figure 03**.

The business model is for the acceptance of liquid wastes, such as oil, and oily water which is more fully described in **Appendix 2 - The Hazardous Materials Inventory Statement**, bulking the wastes by waste type into storage tanks, and ultimately shipping the wastes off site for proper recycling or disposal. This area will be governed by a Standardized Permit issued by California Department of Toxic Substances Control. This permit controls and dictates the design, operation, procedures and plans for a hazardous waste facility to protect human health and the environment. No hazardous waste treatment activities are proposed.

At the bulk liquid receiving waste management unit material will be received and accumulated in closed containers. Like waste streams will be combined and bulked for off-loading and shipment off-site. Although passive treatment of the liquid California-regulated hazardous waste streams may occur through gravity separation, no active processing or treatment of the California-regulated hazardous waste is currently planned.

In the bulk liquid receiving area tank trucks and vacuum trailers will be staged in the designated loading/unloading station. Samples of the incoming waste will be obtained and evaluated prior to receiving the material into the bulking system. Once approved the material will be pumped into the storage tanks associated with the second waste management unit.

The material will be directed to one of six 20,000 gallon unit tanks depending on the type of waste received. This second waste management unit will consist of six aboveground, closed, storage tanks of up to 20,000 gallons each for liquids, and a 20 yard roll-off bin for solids consolidation.

The wastes will be pumped into storage tanks based on compatibility. After classification and profiling into a properly permitted disposal/recycling facility, the waste will be manifested and then pumped into tank trucks or vacuum trailers for transportation by a registered hazardous waste transporter to the designated disposal/recycling facility for further processing.

The solids from cleaning out the storage tanks will be placed into a roll-off bin. This waste will be classified and profiled into a properly permitted disposal/recycling facility. The waste will then be manifested for transportation by a registered hazardous waste transporter to the designated disposal/recycling facility for further processing.

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

**General Information**

Storage and processing systems such as wastewater holding tanks, sludge receiving tanks, centrifuges, and SWECO filtration units will be operated as essentially closed systems. By maintaining and operating the equipment as closed systems the potential for the release of odors is reduced. A comprehensive odor management plan has been prepared and will be implemented at the facility (see **Section IIIe Air Quality** and **Appendix 3**).

The 100 tons per day (TPD) of waste currently processed at the Mill Street plant and the HSS generated by the process will continue at the proposed Shenandoah Way facility with no new materials collected, transported or processed. The new facility will differ from the existing Mill Street facility in that the location is significantly better suited for the light industrial activities to be conducted (based on surrounding businesses), the location of process equipment indoors away from sunlight and heat (which can generate odors, the use of new equipment, the method of handling by-products generated during processing activities, and the installation of odor management systems and equipment.

The existing Wastewater Treatment Plant has successfully maintained compliance with applicable South Coast Air Quality Management District requirements as illustrated by the facility’s compliance history reported in the district’s Facility Information Database with no Notices of Violation. Based on its compliance history and the development and implementation of additional odor control and mitigation measures the facility is expected to continue to comply with applicable air quality compliance requirements.

**8. Surrounding Land Uses and Setting**

**Table B-General Plan Designations and Land Uses**

<b>Location</b>	<b>Land Use Designation</b>	<b>Land Uses</b>
Site	IL	Liquid Processing (former Furniture Manufacturing)
North	IL	Cleared Empty Lot
South	IL	Logistics Warehouse Distribution
East	IL	Logistics Warehouse Distribution
West	IL	Cleared Empty Lot

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

**9. Other agencies whose approval is required (e.g. permits, finance approval, or participation agreement):**

- City of San Bernardino, Business Registration
- City of San Bernardino, Building & Safety.
- City of San Bernardino, Fire Protection.
- City of San Bernardino, Planning Department.
- San Bernardino County Fire, Hazardous Materials Business Emergency Plan
- San Bernardino County Fire, Hazardous Waste Generator Permit
- San Bernardino County Fire, Hazardous Materials Permit
- San Bernardino Municipal Water Department, Industrial User Permit
- California Department of Food and Agriculture, Inedible Kitchen Grease Transporter
- California Department of Food and Agriculture, Renderer License
- Santa Ana Regional Water Quality Board, Storm Water Pollution Prevention Plan
- California Department of Toxic Substances Control, Standardized permit
- California Department of Motor Vehicles, Motor Carrier Permit
- South Coast Air Quality Management District

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

**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 and Forestry Resources | <input type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources     | <input type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Geology / Soils                    |
| <input type="checkbox"/> Greenhouse Gas Emissions | <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 |

**Determination**

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

<input type="checkbox"/>	The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
<input checked="" type="checkbox"/>	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.
<input type="checkbox"/>	The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
<input type="checkbox"/>	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.
<input type="checkbox"/>	Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Printed Name

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

<b>I. AESTHETICS - Would the project:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista 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 highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character 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 daytime or nighttime views of the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*Discussion*

- I.a The proposed project site is an existing developed light industrial that was previously used for furniture manufacturing. The project will not change land uses or otherwise substantially affect the existing scenic vistas in the project areas or visual aspects of the areas. The majority of the new operation will be conducted indoors within an existing building. The proposed project will not change its current aesthetics. The proposed project is located in an area that is developed light industrial with some open lots for future light industrial uses. No impact related to this issue would occur and no mitigation is required.
- I.b The proposed project is not located on a state scenic highway. The proposed project site is an existing developed light industrial that was previously used for furniture manufacturing. The proposed project will not change the aesthetics beyond what is existing. The majority of the new operation will be conducted indoors within an existing building. The proposed project is located in an area that is developed light industrial and cleared empty lots for future light industrial uses. There are no scenic resources or historic buildings located on site. No trees will be removed. No impacts associated with scenic resources within a state scenic highway will occur and no mitigation is required.
- I.c Based on the City's General Plan Land Use Map, the project site's zoning designation is Light Industrial. The proposed project site is an existing light industrial structure that was previously used for furniture manufacturing. The project will not change land uses or otherwise substantially affect or degrade the existing visual character of the site and its surroundings. The proposed project will slightly alter the aesthetics beyond what is existing. It includes a tank farm for the biodigester, wherein the tallest tank is 48 feet high. The current aesthetic is not adversely affected for the following reasons:

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

(1) the height is at least 2 feet below the maximum zoning restricted height;

(2) the property is a well embedded interior lot a few hundred feet from the closest street with direct views to the property (see **Composite Site Plan Fig 08**). Once the surrounding vacant lots have been developed, the tops of the highest tank will likely not be viewable from the public way.

(3) the height of the proposed tank is overshadowed by an existing >80' foot tower on the neighboring Mars Pet Foods plant.

Since no demonstrable negative aesthetic effect to the visual character or quality of the project site or its surroundings will result from the project, no impact related to this issue would occur and no mitigation is required.

I.d The proposed project site is an existing developed light industrial that was previously used for furniture manufacturing. The proposed project would not necessitate the installation of additional outdoor lighting beyond existing conditions. Additionally, lighting sources associated with industrial uses include vehicle lights from project-related traffic, and parking areas. The City of San Bernardino has established standards for the design, placement, and operation of outdoor lighting within its Development Code. These standards identify the preferred lighting source and maximum lighting intensity, dictate shielding requirements, and establish hours of operation. Because these standards are imposed on all outdoor lighting sources and because such standards must be adhered to in order to obtain project approval, these requirements are not considered mitigation. While the proposed development would increase the number and distribution of light sources in the vicinity of the project, adherence to the lighting standards established by the City would reduce potential impacts related to light and glare impacts to a less than significant level and no mitigation is required.

Existing sources of light and glare from surrounding areas include streetlights, exterior lighting from nearby businesses, vehicle headlights and train traffic along BNSF rail lines to the west. The proposed project will not increase sources of light and glare beyond existing conditions. Therefore, no impact associated with this issue would occur with the implementation of this project.



**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

<b>II. AGRICULTURE and FORESTRY RESOURCES - Would the project:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique 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 agricultural zoning, an existing agricultural use, or Williamson Act Conservation 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 by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government 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 environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*Discussion*

II.a Farmland maps are compiled by the California Department of Conservation, Farmland Mapping and Monitoring Program (FMMP), pursuant to the provisions of Section 65570 of the California Government Code. These maps utilize data from the United States Department of Conservation (USDA) Natural Resource Conservation Service (NRCS) soil survey and current land use information using eight mapping categories and represent an inventory of agricultural resources within San Bernardino County. The maps depict currently urbanized lands and a qualitative sequence of agricultural designations. Maps and statistics use a process that integrates aerial photo interpretation, field mapping, a computerized mapping system, and public review.

The project site is designated as “Urban & Built-Up” land, by the FMMP<sup>4</sup> and no Prime, Unique, or Statewide Important Farmland is located on site. As no conversion of such

<sup>4</sup> California Department of Conservation, Farmland Mapping and Monitoring Program, 2011.

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

farmland would occur, no impact related to this issue would occur with implementation of the proposed project.

- II.b The California Land Conservation Act of 1965, commonly referred to as the Williamson Act, enables local government to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agriculture or related open space use. In return, landowners receive property tax assessments much lower than normal because they are based upon farming and open space uses as opposed to full market value. The purpose of the Williamson Act is to encourage property owners to continue to farm their land and to prevent the premature conversion of farmland to urban uses. The project site is not located within a Williamson Act contract area<sup>5</sup> therefore, no impact would result from the proposed development and no mitigation is required.
- II.c The project site is fully developed with no previous agricultural or forestry-related use and does not have any designated forest land use. The proposed project would not conflict with existing forest zoning, cause rezoning of forest land, or result in the loss or conversion of forest lands to non-forest uses as no such resources existing within the City. Therefore, no impacts associated with these issues would occur.
- II.d Please refer to Checklist Response II.c.
- II.e Implementation of the proposed project would not result in the conversion of agricultural land to a non-agricultural use as no agricultural uses exist on site. Similarly, no forestry uses exist on site. In the absence of land designated for agricultural use or forestry use, no impact would occur.

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<sup>5</sup> California Department of Conservation, Williamson Act GIS Coverage, San Bernardino County, *San Bernardino County East Valley Region Parcels Under Agricultural Contract*, October 31, 2005.

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

<b>III. AIR QUALITY - Would the project:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan? (South Coast Air Basin)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing projected air quality violation based on the thresholds in the SCAQMD's "CEQA Air Quality Handbook?"	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 that exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 the Project Description Form?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Generate greenhouse gas emissions, 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"/>
g) Conflict with any applicable plan, policy, or regulation of any agency adopted for the purpose of reducing the emission of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*Discussion*

III.a The project is located within the South Coast Air Basin (Basin) and is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Basin is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. It includes all of Orange County, the non-Antelope Valley portions of Los Angeles County, and the non-desert portions of Riverside and San Bernardino Counties.

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

The outdoor construction of the anaerobic digestion system, and operation and maintenance of the on-going non-hazardous cooking oil and food industry wastewater recycling activities, the bulking of California regulated wastes, the biodigester, and the electrical generating equipment will result in atmospheric emissions. Emission estimates and emissions modeling have been completed to identify the potential impacts to the air basin<sup>6</sup> (see **Appendix 11** – Air Quality Analysis and Health Risk Assessment and **Appendix 12** - Mobile Health Risk Analysis). Based on the results of the emissions evaluation it has been determined that the project as proposed is below SCAQMD significance levels.

All equipment will be operated in accordance with existing SCAQMD permit requirements and related rules and regulations. The project is not forecast to exceed any SCAQMD daily emission thresholds.

This project primarily involves the relocation of an existing operation with expanded operations to include an anaerobic digestion system and a California-regulated Hazardous Waste Bulking & Transfer facility. It is anticipated that all of the current employees will remain employed with the company. Although a number of new employees are projected to be hired development of this project is not considered to be growth-inducing.

The current regional air quality plan is the 2012 Air Quality Management Plan (AQMP) adopted by the SCAQMD on December 7, 2012. The 2007 AQMP proposed attainment demonstration of the federal PM<sub>2.5</sub> standards through a more focused control of sulfur oxides (SO<sub>x</sub>), directly emitted PM<sub>2.5</sub>, and nitrogen oxides (NO<sub>x</sub>) supplemented with volatile organic compounds (VOC) by 2015.

The 8-hour ozone control strategy builds upon the PM<sub>2.5</sub> strategy, augmented with additional NO<sub>x</sub> and VOC reductions, to meet the standard by 2024 assuming a “bump-up” is obtained.<sup>7</sup> A bump-up is a voluntary reclassification of a non-attainment area to a higher classification, allowing for an extension of an attainment deadline. The Basin is currently a federal and state non-attainment area for PM<sub>10</sub>, PM<sub>2.5</sub>, and ozone.

The CAA requires SIPs for most non-attainment areas to demonstrate reasonable further progress (RFP) towards attainment through emission reductions phased in from the time of the SIP submission until the attainment date time frame. The RFP requirements in the CAA are intended to ensure that there are sufficient PM<sub>2.5</sub> and precursor emission reductions in each non-attainment area to attain the 2006 24-hour PM<sub>2.5</sub> NAAQS by December 14, 2014.

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<sup>6</sup> JECSE *Air Quality Analysis and Health Risk Assessment for Co-West Commodities, LLC. Project at 2586 Shenandoah Way in San Bernardino, California, 12 September 2014* and JECSE *Mobile Health Risk Analysis for Co-West Commodities Project in San Bernardino, California 12 September 2014*.

<sup>7</sup> Final 2007 Air Quality Management Plan, South Coast Air Quality Management District, June 2007. Adopted July 13, 2007.

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

Per CAA Section 171(1), RFP is defined as “such annual incremental reductions in emissions of the relevant air pollutant as are required by this part or may reasonably be required by the Administrator for the purpose of ensuring attainment of the applicable national ambient air quality standard by the applicable date.” As stated in subsequent federal regulation, the goal of the RFP requirements is for areas to achieve generally linear progress toward attainment. To determine RFP for the 2006 24-hour PM<sub>2.5</sub> attainment date, the plan should rely only on emission reductions achieved from sources within the non-attainment area.

Section 172(c)(2) of the CAA requires that non-attainment area plans show ongoing annual incremental emissions reductions toward attainment, which is commonly expressed in terms of benchmark emissions levels or air quality targets to be achieved by certain interim milestone years. The U.S. EPA recommends that the RFP inventories include direct PM<sub>2.5</sub>, and also PM precursors (such as SO<sub>x</sub>, NO<sub>x</sub>, and VOCs) that have been determined to be significant.

40 CFR 51.1009 requires any area that submits an approvable demonstration for an attainment date of more than five years from the effective date of designation to also submit an RFP plan. The Final 2012 AQMP demonstrates attainment with the 24-hour PM<sub>2.5</sub> standard in 2014, which is five years from the 2009 designation date. Therefore, no separate RFP plan is required.

The proposed project entails relocating an existing non-hazardous liquid processing and recycling facility from General Commercial (CG-1) zone within the City of San Bernardino to an existing developed Light Industrial (IL) site. The AQMP incorporates local General Plan land use assumptions and regional growth projections developed by the Southern California Association of Governments (SCAG) to estimate stationary and mobile source emissions associated with projected population and planned land uses. If a new land use is consistent with the local General Plan and the regional growth projections adopted in the AQMP, then the added emissions generated by the new project have been evaluated, are contained in AQMP, and would not conflict with or obstruct implementation of the regional AQMP. The existing General Plan designates the project site for IL uses. Implementation of the proposed project is not expected to hinder or obstruct implementation of the AQMP.

Another measurement tool in determining consistency with the AQMP is to determine how a project accommodates the expected increase in population or employment. Generally, if a project is planned in a way that results in the minimization of vehicle miles traveled (VMT) both within the project and the community in which it is located, and consequently the minimization of air pollutant emissions, that aspect of the project is consistent with the AQMP. The proposed project site is located in an urbanized area of the City of San Bernardino. The proposed project would add jobs resulting from the expansion of the business to include California regulated liquid processing. The customer base of commercial and industrial businesses would reduce VMT as they now must travel into the Los Angeles basin. This type of development is consistent with the goals of the AQMP

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

for reducing the emissions. Based on this information, the proposed project would not impair implementation of the AQMP, and would, therefore, have a less than significant impact on implementation of the AQMP.

The proposed project does not include a residential component; therefore, no significant population growth would result from the occupation of the proposed on site use than what was accounted for in the development of the 2012 AQMP. Additionally, the proposed project will create jobs in the local economy. The new employment opportunities resulting from approval of the proposed project will improve the City’s current jobs-to-housing ratio by providing jobs to local residents. While the place of residence of the persons accepting employment provided by the proposed uses is uncertain, due to the City’s projected jobs/housing ratio, it is reasonable that a large percentage of these jobs would be filled by persons already living within the City or project area; therefore, employment projections would remain consistent with regional (SCAG) growth projections and, therefore, consistent with the 2012 AQMP.

Emissions projections used to establish SCAQMD attainment objectives reflect adopted regional and local land use plans. Therefore, the emissions associated with the proposed project are within the amounts already accounted for in the AQMP, and no significant inconsistency with the AQMP would occur and no mitigation is required.

III.bcfg The project is not forecast to exceed any SCAQMD daily emission thresholds. . Emission estimates and emissions modeling have been completed to identify the potential impacts to the air basin<sup>8</sup>. Based on the results of the emissions evaluation it has been determined that the project as proposed is below SCAQMD significance levels.

**Table C - Maximum Daily Unmitigated Construction Emissions from Equipment Delivery and Assembly (2014), lbs/day**

Activity	Source	VOC	NOx	CO	SO <sub>2</sub>	PM10 (Total)	PM2.5 (Total)	CO <sub>2</sub>	CH <sub>4</sub>
Equipment delivery and assembly	Off-road equipment	3.83	31.60	19.65	0.03	2.21	2.08	2,845.86	0.73
Equipment delivery and assembly	On-road equipment	0.10	0.94	1.13	1.77E-03	0.07	0.03	180.84	1.64E-03
Equipment delivery and assembly	Worker trips	0.02	0.01	0.17	2.80E-04	0.02	5.85E-03	24.78	1.47E-03
<b>Maximum Daily Emissions</b>		3.94	32.55	20.94	0.03	2.30	2.11	3,051.48	0.73
<b>Maximum Daily Onsite Emissions</b>		3.83	31.60	19.65	0.03	2.21	2.08	2,845.86	0.73
<b>Localized significance threshold (see note 1)</b>		-	270	1,746	-	106	35	-	-
<b>Regional significance threshold</b>		75	100	550	150	150	55	-	-

<sup>8</sup> JECSE Air Quality Analysis and Health Risk Assessment for Co-West Commodities, LLC. Project at 2586 Shenandoah Way in San Bernardino, California, 12 September 2014, Appendix 11 and JECSE Mobile Health Risk Analysis for Co-West Commodities Project in San Bernardino, California 12 September 2014, Appendix 12.

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

**Table D - Maximum Daily Unmitigated Operational Emissions Summary (2015), lbs/day**

Activity	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM10 (Total)	PM2.5 (Total)	CO <sub>2</sub>	CH <sub>4</sub>
Vehicle trips	1.21	5.76	21.34	0.05	3.69	1.04	4,757.65	0.19
Electricity consumption	0	0	0	0	0	0	985.59	0.04
Off-road equipment	0.72	6.22	3.83	4.57E-03	0.52	0.48	481.10	0.14
Microturbine and Flare (see note 1)	19.20	12.27	115.20	3.61	2.91	2.91	23,473.19	1.44
Boiler	0.20	3.66	3.07	0.02	0.28	0.28	4,388.57	0.08
<b>Maximum Daily Emissions</b>	21.33	27.90	143.44	3.69	7.40	4.71	34,086.10	1.90
<b>Maximum Daily Onsite Emissions</b>	20.12	22.14	122.10	3.64	3.71	3.67	28,342.86	1.67
<b>Localized significance threshold (see note 2)</b>	-	270	1,746	-	26	9	-	-
<b>Regional significance threshold</b>	55	55	550	150	150	55	-	-

As stated in the response to Checklist Question III.a, the project is in a non-attainment basin for PM10, PM2.5, and ozone. The AQMP incorporates local General Plan land use assumptions and regional growth projections developed by the SCAG to estimate stationary and mobile source emissions associated with projected population and planned land uses. The proposed project would be consistent with the development envisioned in the City's General Plan.

The SCAQMD has developed the *CEQA Air Quality Handbook* that establishes suggested significance thresholds based on the volume of pollution emitted. According to the Handbook, any project in the Basin with daily emissions that exceed any of the following thresholds should be considered as having an individually and cumulatively significant air quality impact:

- 55 lbs. per day of ROG (reactive organic gases) (75 lbs./day during construction);
- 55 lbs. per day of NO<sub>x</sub> (oxides of nitrogen) (100 lbs./day during construction);
- 550 lbs. per day of CO (carbon monoxide) (550 lbs./day during construction);
- 150 lbs. per day of PM<sub>10</sub> (150 lbs./day during construction);
- 55 lbs per day of PM<sub>2.5</sub> (55 lbs/day during construction); and
- 150 lbs. per day of SO<sub>x</sub> (oxides of sulfur) (150 lbs./day during construction).

**Construction Emissions.** The proposed project to relocate the existing non-hazardous liquid processing facility and the addition of California hazardous liquid bulking do not consist of any onsite construction activities. The proposed biodigester project will include modular building and processing equipment that would be manufactured off site and brought to the site by truck for installation. The modular

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

components would be mounted on skids placed on reinforced concrete pads on the site. The biodigester tanks would be constructed onsite.

Construction of the proposed project would take approximately three months to complete. Construction staging and contractor parking associated with the proposed project would occur on site with no impact on surrounding businesses or city streets. There would be little or no grading required and only minor earthmoving. Building and architectural coating activities would be limited as most of the equipment would be constructed off site and installed once finished. The exception would be the larger biodigester tanks, which would be built on site. However, neither construction of the tanks, installation of the modular project equipment nor paving are anticipated to result in substantial emissions of any air quality pollutants.

**Operational Emissions.** Long-term pollutant emissions associated with the proposed project would result from vehicular emissions and stationary source emissions created through the consumption of fossil fuels. Additional emissions would result from the consumption of natural gas, the generation of electricity consuming biogas, flare, and the reclamation of yellow and brown grease from cooking oil and non-hazardous food industry wastewater. The flare is used in the startup until enough biogas is produced to run the microturbines, plus the flare is used when the microturbines are down for maintenance or upset.

III.d Sensitive receptors are defined as populations that are more susceptible to the effects of pollution than the population at large. The SCAQMD identifies the following as sensitive receptors: long-term healthcare facilities, rehabilitation centers, convalescent centers, retirement homes, schools, playgrounds, childcare centers, and athletic facilities. The project site is in an area that currently is developed with industrial uses. The closest residence is 880 feet to the west. The proposed project site is not visible from these residences as there is a 250,000 sq. ft. distribution warehouse and the BNSF railway. The project is not forecast to exceed any SCAQMD daily emission thresholds and impacts are considered to be less than significant and no mitigation is required.

**Table E - Summary of Health Risks from Stationary Sources**

Type	Receptor	Microturbine	Flare	Boiler	WWTS	Total
Cancer risk	MEIR	5.38E-08	1.13E-07	6.47E-09	8.10E-10	1.74E-07
Cancer risk	MEIW	3.33E-08	7.77E-07	5.01E-09	2.25E-09	8.17E-07
Cancer risk	Sensitive	1.93E-08	5.89E-08	2.45E-09	7.13E-10	8.13E-08
Chronic hazard	MEIR	1.27E-03	1.58E-04	4.48E-05	2.83E-06	1.48E-03
Chronic hazard	MEIW	4.59E-03	9.78E-03	3.22E-04	4.02E-05	1.47E-02
Chronic hazard	Sensitive	4.56E-04	8.25E-05	1.70E-05	2.49E-06	5.58E-04
Acute hazard	MEIR	1.63E-03	1.46E-02	1.56E-04	1.12E-07	1.63E-02
Acute hazard	MEIW	6.57E-03	7.52E-01	6.79E-04	2.23E-06	7.59E-01
Acute hazard	Sensitive	1.02E-03	1.49E-02	1.19E-04	1.00E-07	1.61E-02

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

Due to limited ground disturbance associated with the minor re-grading activities that may occur during the construction of the biodigester, a potential exists to cause a local nuisance for sensitive receptors, such as residences. Therefore, the following mitigation measures will be implemented to reduce fugitive dust and construction equipment emissions during construction to prevent any local exposure of sensitive receptors to substantial construction related emission impacts:

- III-1 Co-West will require construction contractors to apply water to the disturbed portions of the project sites at least two times per day. On days where wind speeds are sufficient to transport fugitive dust beyond the working area boundary, Co-West will require contractors to increase watering to the point that fugitive dust no longer leaves the property (typically a moisture content of 12%), and/or the contractor will terminate grading operations.***
- III-2 The project will comply with regional rules such as SCAQMD Rules 402, 403 and 404 which would assist in reducing short-term air pollutant emissions. These dust suppression techniques are summarized below.***
  - a. All material transported offsite will be either sufficiently watered or securely covered to prevent excessive amounts of dust.***
  - b. The area disturbed by clearing, grading, earth moving, or excavation operations will be minimized at all times.***
- III-3 All material stockpiles subject to wind erosion during construction activities, that will not be utilized within 3 days, will be covered with plastic, an alternative cover deemed equivalent to plastic, or sprayed with a nontoxic chemical stabilizer.***
- III-4 All vehicles on the construction sites or dirt roads will travel at speeds less than 15 miles per hour. This will be enforced by including this requirement in the construction contract between Co-West and the contracted construction company with penalty clauses for violation of this speed limit.***
- III-5 All engines will be properly operated and maintained. Proper tune for all diesel-powered vehicles and equipment in the South Coast Air Basin requires that fuel injection timing be retarded 2 degrees from the manufacturer's recommendation and use high pressure injectors.***
- III-6 All diesel-powered vehicles will be turned off when not in use for more than 30 minutes and gasoline-powered equipment will be turned off when not in use for more than 5 minutes.***

III.e The operation of the cooking oil and food industry wastewater recycling activities, California regulated waste handling activities, and the operation of the biodigester is expected to result in odors. Long-term objectionable odors will be mitigated at the

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

proposed project site. A comprehensive Odor Management Plan has been prepared and will be implemented at the facility to reduce potential objectionable odors from the operations (see **Appendix 3 for the complete Odor Management Plan**). The following is an excerpt from The Odor Management Plan which describes the mitigation, monitoring and reporting measures to be implemented once the new facility is operational.

**Odor Mitigation Measures, Monitoring and Reporting**

The New Plant, although conducting many of the same types of processing activities as performed at the Existing Plant, will have a significantly reduced potential for odor generation. Unlike the Existing Plant, the operations at the New Plant will be conducted within the building in areas specifically designed for the handling of the waste materials that are the most likely sources of odors. Additionally the design of the New Plant is intended to facilitate collection and control of the waste materials and enhance overall housekeeping and maintenance.

**Tank Vents**

The closed storage tanks used for the accumulation of wastewater, fats, oils, and sludge contain vents. Temperature changes can cause the atmospheric pressure within the tanks to increase resulting in air being discharged through the vent lines. At the Existing Plant the storage tanks are located outside where diurnal temperature changes more significantly affect the atmosphere within the storage tanks. The storage tanks at the New Plant are located within the building, protected from exposure to the sun, and therefore, minimally impacted by diurnal temperature changes.

Air is also released through the vent lines when material is added to the tanks as a result of displacement. The displaced air may contain odors resulting from anaerobic activity occurring in the tank or that has already occurred in materials prior to being delivered to the plant.

Activated carbon is an effective media for controlling odors from organic compounds. The vent lines will be plumbed to a series of activated carbon canisters to passively capture and reduce the potential for the release of odors from the storage tanks.

The use of activated carbon on tank vent lines will occur for both non-hazardous waste storage tanks and California-regulated hazardous waste storage and transfer tanks. Additionally, vacuum trucks used for the delivery and shipping of waste streams and viable products will be equipped with integrated activated carbon systems to mitigate potential odors during the transfer of materials to and from the vacuum trucks.

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

**Closed Systems**

Storage and processing systems such as wastewater holding tanks, sludge receiving tank, California-regulated hazardous waste bulking tanks, centrifuges, and SWACO filtration devices are operated as essentially closed systems. By maintaining and operating the equipment as closed systems the potential for the release of odors is reduced.

Hazardous waste control regulations require that hazardous waste be accumulated in closed containers at all time, unless material is actively being added to or removed from the container. As part of the ancillary waste bulking and transfer operations the facility must conduct daily inspections of the tanks and associated waste accumulation containers to ensure that they are closed. The results of the inspections must be documented and maintained as part of the facility operating record.

**Maintenance and Housekeeping**

Facility maintenance and housekeeping are essential to reducing the potential for the generation of odors during processing activities at the New Plant. At the Existing Plant the potential for leaks, overflows, and spills (although properly contained) is significant based on the age of the facility. Although spills that do occur are very small in quantity and are contained and cleaned up quickly, spilled or leaked material can accumulate over time and foster the proliferation of naturally occurring anaerobic bacteria and the associated by-products of anaerobic bacteria respiration.

The New Plant is equipped with automatic controls that will monitor tank levels and will stop filling the tanks when the quantity in the tank reaches a predetermined volume. The computerized controls will also immediately shut down operations in the event of a process upset, reducing the potential for overflows and spills.

At the New Plant piping and connections are new and maintained inside of the building, not exposed to sunlight or weather that could compromise the structural integrity of the equipment. As a result, the potential for equipment leaks is greatly reduced.

The New Plant is designed with containment basins and trenches to facilitate cleaning and rapid removal of spills and leaks. Timely removal of spilled materials reduces the potential for accumulations of organic material that can support the life cycle of anaerobic bacteria.

Periodic cleaning and maintenance schedules will be implemented at the New Plant to ensure that spilled or leaked organic materials, including but not limited to oils, greases, food solids, and sludge do not accumulate in secondary

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

containment areas, on the exterior of processing equipment, or in other open areas.

**Odor Neutralization/Fogging System**

Odor neutralizers will be utilized throughout the New Plant. The odor neutralizers are specially designed chemicals that are introduced into the atmosphere where they react with potentially malodorous gases to form odorless compounds.

One of the industrial facility scale neutralizers to be used at the New Plant is OBAN® which is used internationally in thousands of applications including but not limited to municipalities, water treatment facilities, hospitals, clinics, nursing homes, and hotels.

Some of OBAN's notable recognitions include:

1. Accepted by the US Dept. of Agriculture as a class C-1 product.
2. Recognized by The Commonwealth of Pennsylvania, Department of General Services Laboratory Division as a product that counteracts malodors.
3. Approved by the state of Connecticut Dept. of Administrative Services, Bureau of Purchases as a specialty item for use by ALL state agencies.
4. Listed in the state of Connecticut DEP Environmentally Preferred Products Catalog.
5. Listed in the state of Massachusetts OSD Environmentally Preferable Products Purchasing Service Catalog.

Some of OBAN's long-term industrial clients:

1. Biox International, New Zealand (waste water facilities).
2. Cassella Waste Systems Inc, NY.
3. Veolia Water, North America, CT Facility.
4. Synagro NE, CT.
5. CT Transit Authority.
6. Hartford Metropolitan District Commission.
7. Poquonock Waste-Water Treatment Facility.

Additionally, fogging systems used to dispense the odor neutralizers will also be installed at the truck unloading area to mitigate potential odors resulting from the delivery trucks during staging and off-loading (see **Fig. 04 and Fig. 07 for Odor Control Fogging Systems** installed throughout the plant). Odor sources may exist at the point of discharge from trucks unloading material at the outdoor docks. The bulkhead areas of these docks will feature a permanently installed high-pressure fogging system manufactured by Micro-Cool and is designed to create enough surface area for the odor molecules and the neutralizer to interact across the micro-droplet interface. Special high pressure pumps and nozzles are used to inject a mixture of product and water into the air (at a ratio of around 1:1000). Since the liquid is atomized into billions of small water droplets, the water quickly evaporates leaving the odor control product to entrap the malodors

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

(using Van der Waal's forces) and biologically degrade; the result leaving the air clean of the malodors. The simultaneous atomization of water and biological products ensures maximum contact to eliminate potential malodors.

The nozzle lines will be installed above the area of concern and the fog will create a barrier through which the malodor must pass. This type of odor control system is sufficiently robust as to insure larger-scale neutralization and is used at municipal wastewater treatment plants, lift wells, trash stations, extractor fans, rendering plants, and other facilities. An added benefit of this method of adiabatic cooling is to give localized cooling to keep operators comfortable during the hot months.

Odor neutralizers are preferred to odor maskants since the neutralizers are intended to chemically change the malodorous compounds into odorless compounds. Maskants add to the odor matrix and attempt to cover or overpower the unwanted odor.

**Odor Surveillance Protocol**

To further enhance compliance an **Odor Surveillance Protocol** will be established at the New Plant. The protocol will establish a mechanism for the facility to actively monitor the area surrounding the New Plant for potential odor issues. By initiating a proactive surveillance program to identify detectable levels of odors in the surrounding community the facility will be better able to address issues before they become problems.

The protocol is to be implemented a minimum of once each week on different days and times. An Environmental Observer, as determined by the Production Manager or designee, is to canvass specific neighborhoods surrounding the New Plant. While canvassing the area the Environmental Observer will periodically evaluate odors in the area to determine if any odors that are typically associated with oil and grease processing can be detected. The findings will be recorded.

If an odor is detected by the Environmental Observer, the **Odor Response Protocol** must be initiated.

If an odor detected by the Environmental Observer is expected to be a result of operations conducted at the New Plant, notification must be provided to the Production Manager and the General Manager. The General Manager and Production Manager will then evaluate production processes with the intent of identifying potential sources of the odor and implement measures to further control or reduce the generation of the odor if possible.

**Odor Response Protocol**

The **Odor Response Protocol** establishes procedures to enhance compliance and to establish systematic response in the event that an air quality or odor compliant

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

is received by Co-West Commodities and notification of complaints received by any regulatory agency that is reported to Co-West Commodities.

The Production Manager is responsible for implementing this procedure. The receptionist and other staff members must be aware of the procedure in the event that they receive notification an odor complaint. All odor complaints must be reported to the Production Manager and the General Manager.

The Odor Response Protocol is to be implemented each time an air quality or odor complaint is reported to the facility. All complaints must be routed to the General Manager. In the event of his absence, complaints will be directed to the Production Manager.

The person receiving the complaint is responsible for collecting and documenting information regarding the complaint.

The General Manager (or Production Manager) will review the information, and if known, the General Manager will travel to the address from which the complaint was made to initiate the field evaluation process. If upon arriving at the address of the complainant (or in the general vicinity of the area from which the complaint originated), the General Manager determines that the odor is no longer detected, the findings will be documented. If the odor is detected, the General Manger will canvas the property and surrounding neighborhoods to investigate the extent of the odor and potential sources. If an odor is detected and correlated to a process conducted at Co-West Commodities, the operation suspected of causing the odor will be stopped. The General Manager or assigned personnel will monitor the area until the odor has dissipated or is otherwise not detected.

All production records will be reviewed for the 24-hour period preceding the complaint. Atmospheric conditions based on data collected by the Co-West Commodities weather monitoring station will be recorded on an hourly basis for the 24 hour period preceding the complaint.

The information collected will be reviewed for possible correlation between the complaint and Co-West Commodities production. Any correlations noted will be investigated and corrective actions developed.

Upon completion of the evaluation the General Manager will attempt to contact the complainant to discuss the results of the evaluation.

A report will be generated to document the results of the evaluation.

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

**Public Accountability Measures**

Co-West will provide a quarterly report to the City of San Bernardino for the first twelve months following the commencement of operations at the new plant. The quarterly report will summarize any complaints regarding odors that have been received by Co-West and the response to such complaints.

Additionally, Co-West will provide a cell phone number, assigned to Co-West's Environmental Observer, to members of the public residing within 1,000 feet of the New Plant. The information will also include the telephone number for South Coast Air Quality Management District complaint line in the event that the complainant does not believe that Co-West has responded in a timely or effective manner.

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

**Summary of Odor Control Strategies**

No.	Description	Expected Impact
1	Carbon adsorption on tank vents	Eliminate and reduce potential for odors from storage tanks.  Reduce potential for odors during offloading of materials.
2	Closed storage and processing systems	Reduce potential for the release of odors during processing activities.
3	Indoor storage and processing systems	Better contain potential odors for treatment (see item 5).
4	Maintenance and housekeeping protocols	Eliminate the potential for conditions that could result in odor generation from anaerobic bacteria respiration in spilled or leaked materials accumulating on and around equipment.
5	Odor neutralizers/fogging system	Chemical change odor causing compounds to an odorless compound.

**Comparison of New Plant and Existing Plant**

No.	Condition	Existing Plant	New Plant
1	Outside storage of wastewater	X	
2	Outside storage of waste oil	X	
3	Outside storage of recovered oil/grease	X	
4	Outside storage of solids	X	
5	Outside processing in DAF	X	
6	Outside processing in open filters and centrifuges	X	
7	In-ground grease traps located outside	X	
8	Interior storage of wastewater		X
9	Interior storage of waste oil		X
10	Interior storage of recovered oil/grease		X
11	Interior storage of solids		X
12	Closed processing systems (filters/centrifuges)		X
13	Use of bio-digester for immediate processing of solids and high strength slurry streams		X
14	Closed storage containers		X
15	Carbon treatment for storage tank vent lines		X
16	Odor neutralizers/fogging system	X	X
17	Specially designed containment systems for material collection and cleaning		X

Impacts from objectionable odors generated by the project are considered less than significant with mitigation proposed.

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

III.f The proposed project involves replacing a furniture manufacturing facility with a liquid processing facility, which currently resides within the City of San Bernardino. The proposed project will not result in a net increase in greenhouse gas (GHG) emissions beyond the significant impact threshold as determined by the air quality analysis<sup>9</sup>.

After implementation of application of regulatory requirements, the project would implement appropriate GHG reduction strategies and would not conflict with or impede implementation of reduction goals identified in AB 32, the Governor’s Executive Order S-3-05, and other strategies to help reduce GHGs to the level proposed by the Governor. It was also determined the project would not be significantly affected by global climate change since it is away and elevated from the coast (predicted sea level rise) and it is not in a urban/wild land interface (increased drought and fire risks).

The proposed project includes the construction and operation of an anaerobic digestion system, which will essentially recycle the HSS produced from the Co-West wastewater treatment process into energy. The biodigester will also use the solids separated from the incoming food industry grease trap wastewater, eliminating the need to remove these solids from the site. Biogas produced by the biodigester will be used to generate 1 megawatt of electricity. The liquid effluent from the biodigester will be returned to the Co-West process for disposition to the municipal sewer, while the solid effluent (digestate) will be transported to a composting facility.

Operation of the biodigester system will result in a net reduction of 1,054 metric tons of GHG per year. The table below shows how this reduction is achieved<sup>10</sup>.

**Table F  
GHG Generated and Avoided Emissions for the Biodigester Operations**

	<b>Greenhouse Gas Impact (MTCO<sub>2</sub>e/year)</b>
<b>Generated Emissions</b>	
Transportation Emissions	29.6
Processing Emissions	0
Anaerobic Digestion Emissions	0
Electricity Production Emissions	743.1
Digestate Disposal Emissions	583.5
<b>Subtotal</b>	<b>1,356.2</b>
<b>Avoided Emissions</b>	
Avoided Transportation Emissions	-20.4
Avoided Landfill Emissions	0
Avoided Composting Emissions	-375.7
Avoided Grid Electricity Emissions	-2,014.1
<b>Subtotal</b>	<b>-2,410.2</b>
<b>Biodigester GHG Emissions</b>	<b>-1,053.9</b>

<sup>9</sup> JECSI *Air Quality Analysis and Health Risk Assessment for Co-West Commodities, LLC. Project at 2586 Shenandoah Way in San Bernardino, California, 12 September 2014, Appendix 11.*

<sup>10</sup> Calculated by TSS Consultants, September 3, 2014

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

III.g The Climate Action Team (CAT) and the CARB have developed several reports to achieve the Governor’s GHG targets that rely on voluntary actions of California businesses, local government and community groups, and state incentive and regulatory programs. These include the CAT’s 2006 “Report to Governor Schwarzenegger and the Legislature,” the CARB’s 2007 “Expanded List of Early Action Measures to Reduce Greenhouse Gas Emissions in California,” and the CARB’s “Climate Change Proposed Scoping Plan: a Framework for Change.”

The reports identify strategies to reduce California’s emissions to the levels proposed in Executive Order S-3-05 and AB 32 (i.e., 29% below existing “business as usual” emissions) that are applicable to proposed project. Table B presents the applicable Recommended Actions (qualitative measures) identified to date by the CARB in its Climate Change Proposed Scoping Plan and whether or not the proposed project is consistent with the applicable Recommended Actions.

**Table G – Recommended Actions for Climate Change Project Summary**

ID No.	Sector	Strategy Name	Applicable to Project?	Will Project Conflict with Implementation?
T-1	Transportation	Pavley I and II – Light-Duty Vehicle GHG Standards	Yes	No
T-2	Transportation	Low Carbon Fuel Standard (Discrete Early Action)	Yes	No
T-3	Transportation	Regional Transportation-Related GHG Targets	Yes	No
T-4	Transportation	Vehicle Efficiency Measures	Yes	No
T-5	Transportation	Ship Electrification at Ports (Discrete Early Action)	No	No
T-6	Transportation	Goods-movement Efficiency Measures	No	No
T-7	Transportation	Heavy Duty Vehicle Greenhouse Gas Emission Reduction Measure – Aerodynamic Efficiency (Discrete Early Action)	No	No
T-8	Transportation	Medium and Heavy-Duty Vehicle Hybridization	No	No
T-9	Transportation	High Speed Rail	No	No
E-1	Electricity and Natural Gas	Increased Utility Energy Efficiency Programs. More Stringent Building and Appliance Standards	Yes	No
E-2	Electricity and Natural Gas	Increased Combined Heat and Power Use by 30,000 GWh	No	No
E-3	Electricity and Natural Gas	Renewable Portfolio Standard	No	No

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

E-4	Electricity and Natural Gas	Million Solar Roofs	No	No
CR-1	Electricity and Natural Gas	Energy Efficiency	No	No
CR-2	Electricity and Natural Gas	Solar Water Heating	No	No
GB-1	Green Buildings	Green Buildings	Yes	No
W-1	Water	Water Use Efficiency	Yes	No
W-2	Water	Water Recycling	No	No
W-3	Water	Water System Energy Efficiency	No	No
W-4	Water	Reuse Urban Runoff	No	No
W-5	Water	Increase Renewable Energy Production	No	No
W-6	Water	Public Goods Charge (Water)	No	No
I-1	Industry	Energy Efficiency and Cost-Benefits Audits for Large Industrial Sources	No	No
I-2	Industry	Oil and Gas Extraction GHG Emission Reduction	No	No
I-3	Industry	GHG Leak Reduction from Oil and Gas Transmission	No	No
I-4	Industry	Refinery Flare Recovery Process Improvements	No	No
I-5	Industry	Removal of Methane Exemption from Existing Refinery Regulations	No	No
RW-1	Recycling and Waste Management	Landfill Methane Control (Discrete Early Action)	No	No
RW-2	Recycling and Waste Management	Additional Reduction in Landfill Methane – Capture Improvements	No	No
RW-3	Recycling and Waste Management	High Recycling/Zero Waste	No	No
F-1	Forestry	Sustainable Forest Target	No	No
H-1	High Global Warming Potential Gases	Motor Vehicle Air Conditioning Systems (Discrete Early Action)	No	No
H-2	High Global Warming Potential Gases	SF <sub>6</sub> Limits in Non-Utility and Non-Semiconductor Manufacturing (Discrete Early Action)	No	No
H-3	High Global Warming Potential Gases	Reduction in Perfluorocarbons in Semiconductor Manufacturing (Discrete Early Action)	No	No
H-4	High Global Warming Potential Gases	Limit High GWP Use in Consumer Products (Discrete Early Action, Adopted June 2008)	No	No

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

H-5	High Global Warming Potential Gases	High GWP Reduction from Mobile Sources	No	No
H-6	High Global Warming Potential Gases	High GWP Reductions from Stationary Sources	No	No
H-7	High Global Warming Potential Gases	Mitigation Fee on High GWP Gases	No	No
A-1	Agriculture	Methane Capture at Large Dairies	No	No

Applicable Recommended Actions in the Transportation sector include Actions T-1 through T-4. Action T-1 involves improvements to light-duty vehicle technology for the purposes of reducing GHG emissions through focusing on legislating improved controls for vehicle manufacturers. This Action would not generally be considered applicable to the proposed project; however, vehicles utilized by the proposed project would be subject to these standards, as applicable, and would be consistent with this Action. Action T-2 involves implementation of a low carbon fuel standard.

In order to reduce the carbon intensity of transportation fuels, the CARB is developing a Low Carbon Fuel Standard (LCFS), which would reduce the carbon intensity of California’s transportation fuels by at least 10 percent by 2020 as called for by Governor Schwarzenegger in Executive Order S-01-07. While implementation of this standard is not within the purview of a development project, a land use such as that proposed under the proposed project would be a substantial consumer of fuels for its vehicle fleet. Vehicles utilized by the proposed project would be subject to these standards, as applicable, and would be consistent with this Action.

Action T-3 addresses regional transportation targets for reducing GHG emissions. The intent of the proposed project is to reduce vehicle miles traveled (VMT) within the region by reducing trip lengths and providing a sustainable community. The actions associated with implementation of the proposed project would allow for local industrial businesses to utilize the facility rather than driving into the Los Angeles basin and would encourage a reduction of VMT within the region.

Action T-4 concerns vehicle efficiency measures such as the promotion of sustainable tire practices. The CARB is pursuing a regulation to ensure that tires are properly inflated when vehicles are serviced. In addition, the California Energy Commission (CEC) in consultation with the California Integrated Waste Management Board (CIWMB) is developing an efficient tire program focusing first on data gathering and outreach, then on potential adoption of minimum fuel-efficient tire standards, and on the development of consumer information requirements for replacing tires. While implementation of this standard is not within the purview of a development project, a land use such as that proposed under the proposed project would be a contributor of VMT. Vehicles utilized by the proposed project would be subject to these standards, as applicable, and would be consistent with this Action.

Applicable Recommended Actions in the Energy and Natural Gas sector includes Action E-1. Action E-1, together with Action GB-1 (Green Building), aims to reduce electricity

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

demand by increased efficiency of Utility Energy Programs and adoption of more stringent building and appliance standards. Elements of this action include encouraging construction of zero net energy (ZNE) buildings and implementation of passive solar design. In addition to employing on-site electricity generation, a ZNE building must either replace natural gas with renewable energy for space and water heating, or compensate for natural gas use by generating surplus electricity for sale on the State’s electricity grid. Any additions or improvements to the proposed project will be required to comply with the most recent Title 24 Energy Efficiency Standards and applicable Green Building Standards; therefore, the proposed project would not conflict with these Actions.

Applicable Recommended Actions in the Water sector includes Action W-1. Action W-1, Water Use Efficiency, involves the reduction in the energy consumption used to convey, treat, distribute, and use water and wastewater. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions. The proposed project would install water-efficient fixtures and appliances and would not conflict with this Action.

GHG emissions reduction strategies were also set forth in the 2006 Climate Action Team (CAT) Report, and the strategies included in the CAT Report that apply to the project are contained in **Table H**, which also summarizes the extent to which the project would comply with the strategies to help California reach the emission reduction targets. The strategies listed in **Table H** are addressed as either part of the project, required mitigation measures, or requirements under local or State ordinances.

**Table H – Project Compliance with Greenhouse Gas Emission Reduction Strategies**

Strategy	Project Compliance
<i>Mandatory Code</i>	
<p><b>California Green Building Code.</b> The Cal Green Code prescribes a wide array of measures that would directly and indirectly result in reduction of GHG emissions from the Business as Usual Scenario (California Building Code). The mandatory measures that are applicable to nonresidential projects include site selection, energy efficiency, water efficiency, materials conservation and resource efficiency, and environmental quality measures.</p>	<p><b>Compliant.</b> The project would be required to adhere to the nonresidential mandatory measures as required by the CalGreen Code.</p>
<i>Energy Efficiency Measures</i>	

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

**Energy Efficiency.** Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California (including both investor-owned and publicly owned utilities).

**Renewables Portfolio Standard.** Achieve a 33 percent renewable energy mix statewide.

**Green Building Strategy.** Expand the use of green building practices to reduce the carbon footprint of California’s new and existing inventory of buildings.

**Compliant.** The proposed project will comply with the updated Title 24 standards, including the new 2010 California Building Code (CBC), for building construction of any tenant improvements. The READ facility producing 1mw/hr of electricity will reduce GHG by 7,906 tons per year.

*Water Conservation and Efficiency Measures*

**Water Use Efficiency.** Continue efficiency programs and use cleaner energy sources to move and treat water. Approximately 19 percent of all electricity, 30 percent of all natural gas, and 88 million gallons of diesel are used to convey, treat, distribute and use water and wastewater. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions.

**Compliant.** The project will implement the recommended mitigation measures, including measures to increase water use efficiency.

*Solid Waste Reduction Measures*

**Increase Waste Diversion, Composting, and Commercial Recycling, and Move Toward Zero-Waste.** Increase waste diversion from landfills beyond the 50 percent mandate to provide for additional recovery of recyclable materials. Composting and commercial recycling could have substantial GHG reduction benefits. In the long term, zero waste policies that would require manufacturers to design products to be fully recyclable may be necessary.

**Compliant** The proposed project will implement the recommended mitigation measures, including measures to increase solid waste diversion and recycling.

*Transportation and Motor Vehicle Measures*

**Vehicle Climate Change Standards.** AB 1493 (Pavley) required the State to develop and adopt regulations that achieve the most feasible and cost-effective reduction of GHG emissions from passenger vehicles and light-duty trucks. Regulations were adopted by the CARB in September 2004.

**Compliant.** The project does not involve the manufacture of vehicles. However, vehicles that are purchased and used within the project site would comply with any vehicle and fuel standards that the CARB adopts.

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

**Light-Duty Vehicle Efficiency Measures.** Implement additional measures that could reduce light-duty GHG emissions. For example, measures to ensure that tires are properly inflated can both reduce GHG emissions and improve fuel efficiency.

**Adopt Heavy- and Medium-Duty Fuel and Engine Efficiency Measures.** Regulations to require retrofits to improve the fuel efficiency of heavy-duty trucks that could include devices that reduce aerodynamic drag and rolling resistance. This measure could also include hybridization of and increased engine efficiency of vehicles.

**Low Carbon Fuel Standard.** The CARB identified this measure as a Discrete Early Action Measure. This measure would reduce the carbon intensity of California’s transportation fuels by at least 10 percent by 2020.

**Regional Transportation-Related Greenhouse Gas Targets.** Develop regional GHG emissions reduction targets for passenger vehicles. Local governments will play a significant role in the regional planning process to reach passenger vehicle GHG emissions reduction targets. Local governments have the ability to directly influence both the and design of new residential and commercial developments in a way that reduces GHGs associated with vehicle travel.

**Compliant.** Specific regional emission targets for transportation emissions do not directly apply to this project; regional GHG reduction target development is outside the scope of this project. The project will comply with any plans developed by the City.

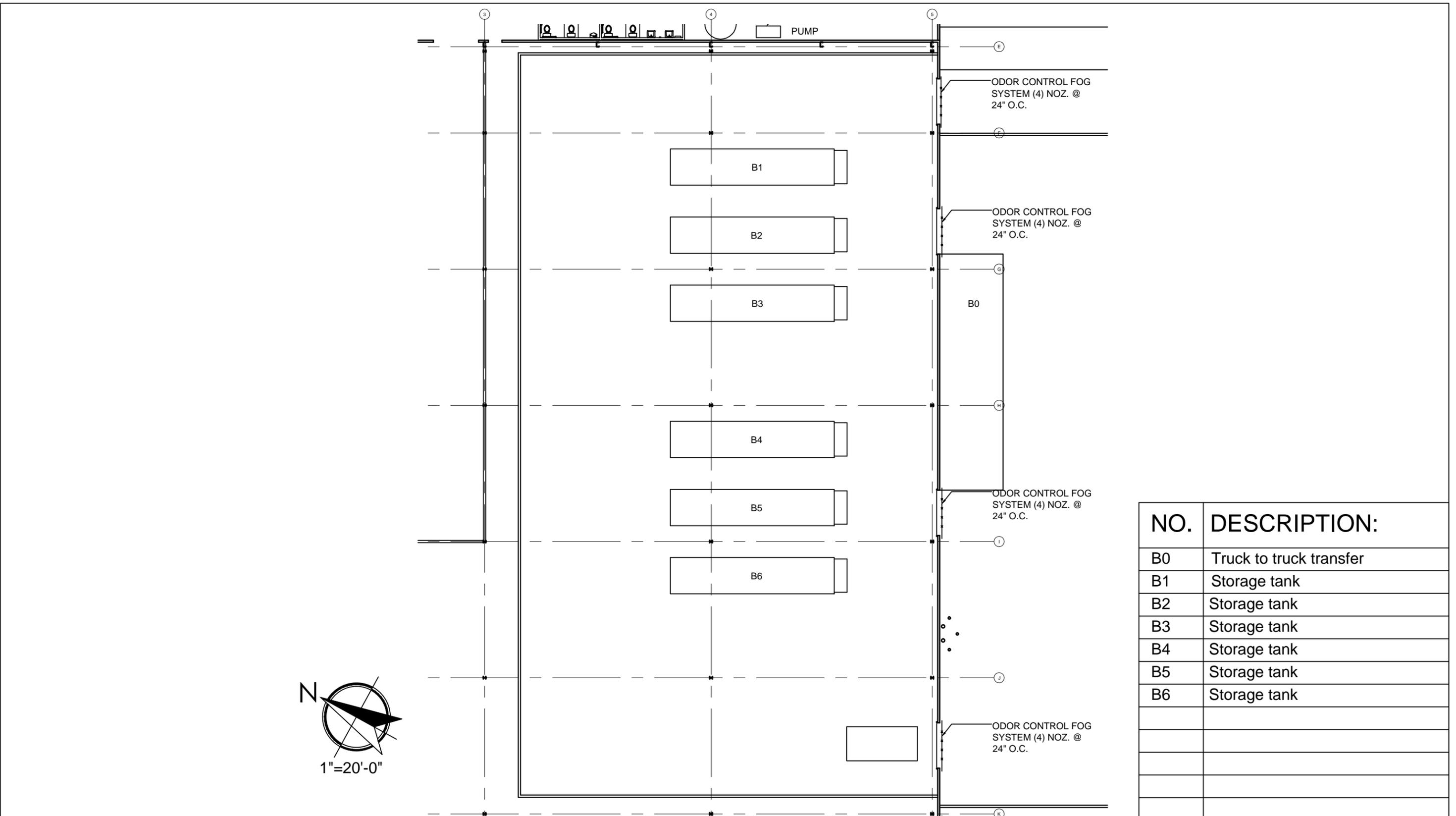
**Measures to Reduce High Global Warming Potential (GWP) Gases.** The CARB has identified Discrete Early Action measures to reduce GHG emissions from the refrigerants used in car air conditioners, semiconductor manufacturing, and consumer products. The CARB has also identified potential reduction opportunities for future commercial and industrial refrigeration, changing the refrigerants used in auto air conditioning systems, and ensuring that existing car air conditioning systems do not leak.

**Compliant.** New products used or serviced on the project site (after implementation of the reduction of GHG gases) would comply with future CARB rules and regulations.

The proposed project includes a variety of physical attributes and operational programs that would generally contribute to a reduction in operational-source pollutant emissions including GHG emissions. As identified in **Table H**, future development that would occur under the proposed project would be consistent with GHG emission reduction strategies and policies. The project would implement appropriate GHG reduction strategies and would ensure that it does not conflict with or impede implementation of reduction goals identified in AB 32, Governor’s Executive Order S-3-05, and other strategies to help reduce GHGs to the level proposed by the Governor. In addition, the project would also be subject to all applicable regulatory requirements, which would also reduce the GHG emissions of the project.

The proposed project will have less than significant impacts related to greenhouse gases and global climate change.

Figure 07 Hazardous Materials Odor Control Floor Plan



NO.	DESCRIPTION:
B0	Truck to truck transfer
B1	Storage tank
B2	Storage tank
B3	Storage tank
B4	Storage tank
B5	Storage tank
B6	Storage tank

CO-WEST COMMODITIES  
 1389 WEST MILLS STREET, SAN BERNARDINO CALIFORNIA

LOGOS ARCHITECTURE INC.  
 715 EAST HARRISON STREET, CORONA CALIFORNIA

REGULATED HAZARDOUS WASTE PROCESS DIAGRAM

DRAWING:  
 FIGURE 2

DATE: 07.21.14

PAGE: 2 OF 2

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

<b>IV. BIOLOGICAL RESOURCES - Would the project:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>a)</b> Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>b)</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 U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>c)</b> 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"/>
<b>d)</b> Interfere substantially with the movement of any 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"/>
<b>e)</b> Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>f)</b> 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"/>

*Discussion*

IV.a The proposed project will consist of limited construction activities on an existing, already developed site. The project is not anticipated to result in impacts to candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game (CDFG) or U.S. Fish and Wildlife Service (USFWS).

IV.b No drainage features, ponded areas, or riparian habitat potentially subject to jurisdiction by the CDFG were found within the project site. Habitats considered sensitive by federal or state resource agencies and other groups are those that have been depleted, are naturally

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

uncommon, or support sensitive species. Vegetation on site consists of landscaping; palm trees, raven grass and flowers. No sensitive natural communities would be affected by the proposed project. Therefore, no impact is anticipated with regard to riparian habitat or other sensitive natural communities, and no mitigation is required.

- IV.c No drainage features, ponded areas, or riparian habitat potentially subject to jurisdiction by the CDFG, USACE, and/or RWQCB were found within the project site. No impact related to this issue would occur; therefore, no mitigation is required.
- IV.d Due to the area's predominantly developed nature and the site's current condition, the project site does not provide suitable foraging ground or localized movement for wildlife. Habitat fragmentation occurs when a proposed action results in a single, unified habitat area being divided into two or more areas, such that the division isolates the two new areas from each other. Isolation of habitat occurs when wildlife cannot move freely from one portion of the habitat to another or from one habitat type to another. An example is the fragmentation of habitats within and around clustered residential development. Habitat fragmentation may occur when a portion of one or more habitats is converted into another habitat, as when scrub habitats are converted into annual grassland habitat because of frequent burning. The San Bernardino Valley is subject to ongoing urbanization and consequent loss of habitat and open space. Furthermore, the project site is currently surrounded by existing light industrial development and is not part of a larger interconnected movement corridor for wildlife. No impact related to this issue would occur; therefore, no mitigation is required.
- IV.e The City has a tree removal policy that states that if more than five trees are to be removed, a tree removal permit application must be submitted to and approved by the City<sup>11</sup>. The City typically requires a replacement ratio at 1:1 for all removed trees. Because the project site is a currently developed light industrial site no trees will be removed and no impact related to this issue will occur.
- IV.f The project site is not located within a Habitat Conservation Plan or Natural Community Conservation Plan. Figures NRC-1<sup>12</sup> and NRC-2<sup>13</sup> of the City of San Bernardino General Plan indicates that project is not in a sensitive Biological Resource Area. No impact would occur with the implementation of the proposed project and no mitigation is required.

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<sup>11</sup> City of San Bernardino Municipal Code, Section 15.34.

<sup>12</sup> Figure NRC-1, Potential Habitat for Sensitive Wildlife, City of San Bernardino General Plan, November 2005.

<sup>13</sup> Figure NRC-2, Biological Resources Area, City of San Bernardino General Plan, November 2005.

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

<b>V. CULTURAL RESOURCES - Would the project:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Be developed in a sensitive archaeological area as identified in the City’s General Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource as defined in CEQA Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Cause a substantial adverse change in the significance of a historic resource pursuant to CEQA Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Directly or indirectly destroy a unique paleontological resource or site unique to geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Disturb any human remains, including those interred outside formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*Discussion*

V.a A “historic resource” includes, but is not limited to any object, building, site, area, place, record, or manuscript that is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California<sup>14</sup>. CEQA mandates that Lead Agencies consider a resource to be “historically significant” if it meets the criteria for listing in the California Register of Historical Resources (California Register). Such resources meet this requirement if they are (1) Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States, (2) Associated with the lives of persons important to local, California or national history, (3) Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values, and/or (4) Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

The site does not contain significant cultural resources. The site is also not designated as a sensitive archaeological area in the City’s General Plan or General Plan EIR<sup>15</sup>. Therefore, no impact is anticipated and no mitigation is proposed.

<sup>14</sup> Public Resources Code, Section 5020.1(j).

<sup>15</sup> Figure 5.4.2, Section 5 Paleontological Resources, City of San Bernardino General Plan Update & Associated Specific Plans EIR, The Planning Center, July 2005.

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

- V.b-c See response to item V.a above. No cultural resources were identified within the project boundaries by the records search. The project site has been previously developed. The proposed project will consist of limited construction activities on an existing, already developed site. The cultural resource value of this site has been evaluated and this project will have no impact to historical resources.
- V.d The City of San Bernardino General Plan does not directly address paleontological resources. The project site has been previously developed. The proposed project will consist of limited construction activities on an existing, already developed site. The project will have no impact to paleontological resources.
- V.e No evidence is in place to suggest the project site has been used for human burials. The project site has been previously developed. The proposed project will consist of limited construction activities on an existing, already developed site. The project will have no impact to this issue.

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

<b>VI. GEOLOGY AND SOILS - Would the project:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Involve earth movement (cut and/or fill) based on information contained in the Preliminary Project Description?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Expose people or structures to substantial adverse effects, including the risk of loss, injury, or death?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located within and Alquist-Priolo Earthquake Fault Zone?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in erosion, dust or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Be located within an area subject to landslides, mudslides, subsidence, or other similar hazards as identified in the City's General Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be located within an area subject to liquefaction as identified in the City's General Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Modify any unique geological or physical feature based on a site survey/evaluation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Result in erosion, dust, or unstable soil conditions from excavation, grading, fill, or other construction activities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Other: Development within Hillside Management District on slopes in excess of 15 percent.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*Discussion*

VI.a Implementation of the proposed project will require minimal grading and construction activity. This will take place on an area that has been previously graded and paved. The proposed project will consist of limited construction activities on an existing, already developed site. There will be less than significant impacts associated with this issue and no mitigation is required.

VI.b-c Fault rupture is the most easily avoided seismic hazard. The Alquist-Priolo Earthquake Fault Zoning Act (A-P Act) mitigates fault rupture hazards by prohibiting the location of structures for human occupancy across the trace of an active fault. The A-P Act requires the State Geologist to delineate "Earthquake Fault Zones" along faults that are "sufficiently active" and "well defined." The boundary of an "Earthquake Fault Zone" is generally 500 feet from

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

major active faults and from 200 to 300 feet from well defined minor faults. The mapping of active faults has been completed by the State Geologist. These maps are distributed to all affected cities, counties, and State agencies for their use in developing planning policies and controlling renovation or new construction.

As identified in the City's General Plan, the proposed project site is not located within the boundaries of an earthquake fault zone for fault-rupture hazard as defined by the Alquist-Priolo Earthquake Fault Zoning Act<sup>16</sup>. Although no active traces of fault have been identified within the project limits, the City is situated in a seismically active area. Ground shaking is expected to be the primary hazard likely to affect the project.

The existing structure was designed and constructed with the regulations established in the California Building Code. No construction activity will take place to alter the existing structural system serving the existing building. As a result, there is less than significant impact regarding this issue and no mitigation is required.

- VI.d The proposed project is located in an area susceptible to high winds<sup>17</sup>, however the site is an existing developed industrial site with no exposed soils. The site is covered 97% by the building, asphalt and concrete and the remaining is landscaping.

Due to limited ground disturbance associated with the minor re-grading activities that may occur during the construction of the biodigester, a potential exists to cause a local nuisance for sensitive receptors, such as residences. Therefore, the following mitigation measures will be implemented to reduce fugitive dust and construction equipment emissions during construction to prevent any local exposure of sensitive receptors to substantial construction related emission impacts:

***III-1 Co-West will require construction contractors to apply water to the disturbed portions of the project sites at least two times per day. On days where wind speeds are sufficient to transport fugitive dust beyond the working area boundary, Co-West will require contractors to increase watering to the point that fugitive dust no longer leaves the property (typically a moisture content of 12%), and/or the contractor will terminate grading operations.***

***III-2 The project will comply with regional rules such as SCAQMD Rules 402, 403 and 404 which would assist in reducing short-term air pollutant emissions. These dust suppression techniques are summarized below.***

- a. All material transported offsite will be either sufficiently watered or securely covered to prevent excessive amounts of dust.***
- b. The area disturbed by clearing, grading, earth moving, or excavation operations will be minimized at all times.***

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<sup>16</sup> Figure S-3 Alquist-Priolo Study Zones, City of San Bernardino General Plan, November 2005.

<sup>17</sup> Figure S-8 Wind Hazards, City of San Bernardino General Plan, November 2005.

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

- III-3 All material stockpiles subject to wind erosion during construction activities, that will not be utilized within 3 days, will be covered with plastic, an alternative cover deemed equivalent to plastic, or sprayed with a nontoxic chemical stabilizer.***
- III-4 All vehicles on the construction sites or dirt roads will travel at speeds less than 15 miles per hour. This will be enforced by including this requirement in the construction contract between Co-West and the contracted construction company with penalty clauses for violation of this speed limit.***
- III-5 All engines will be properly operated and maintained. Proper tune for all diesel-powered vehicles and equipment in the South Coast Air Basin requires that fuel injection timing be retarded 2 degrees from the manufacturer's recommendation and use high pressure injectors.***
- III-6 All diesel-powered vehicles will be turned off when not in use for more than 30 minutes and gasoline-powered equipment will be turned off when not in use for more than 5 minutes.***

Therefore, with limited mitigation implemented there is no impact regarding this issue.

- VI.e. The topography of the site is generally flat and does not present any significant topographical features that would result in any landslide occurrences. Based on the City's General Plan, the project site is not located within an area susceptible to landslide activity<sup>18</sup>. No landslide impact would result from the development of the proposed on-site uses. The project site is identified by the City as not being within an area of potential ground subsidence<sup>19</sup>. There is no significant impact regarding this issue and no mitigation is required.
- VI.f Liquefaction is a phenomenon that occurs when strong earthquake shaking causes soils to collapse from a sudden loss of cohesion and undergo a transformation from a solid to a liquefied state. Factors influencing a site's potential for liquefaction include area seismicity, the type and characteristics of on-site soils, and the level of groundwater. Liquefaction typically occurs in areas where groundwater is shallower than approximately 30 feet, and where there is the presence of loose, sandy soils. According to the City's General Plan, the project site is not within an area that has a high potential for liquefaction<sup>20</sup>. There is no significant impact regarding this issue and no mitigation is required.
- VI.g The project site is located in the foothills of the San Bernardino Mountains in a gently sloping area. The project is relatively flat and is typical of property in the project vicinity. As no unique or physical, geologic, or topographic feature is located within the limits of the proposed project, no impact associated with this issue is anticipated to occur and no mitigation measures are required.

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<sup>18</sup> Figure S-7, Slope Stability and Major Landslides, City of San Bernardino General Plan, November 2005.

<sup>19</sup> Figure S-6, Potential Subsidence Areas, City of San Bernardino General Plan, November 2005.

<sup>20</sup> Figure S-5, Liquefaction Susceptibility, City of San Bernardino General Plan, November 2005

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

- VI.h Refer to Checklist Response VI.d.
  
- VI.i The proposed project is not located within the City's Hillside Management Overlay District (HMOD). Because the proposed project is not located in a hillside area, no impact related with this issue would occur and no mitigation is required.

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

<b>VII. HAZARDS AND MATERIALS - Would the project:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 material into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 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 wild land fires, including where wild lands are adjacent to urbanized areas or where residences are intermixed with wild lands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Other: Expose persons or property to significant risk, injury, or death involving high winds?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

*Discussion*

VII.a The proposed project operationally will handle potentially hazardous materials, such as waste oil, oily water, brine water, and food industry cooking oils and food industry wastewater. The transport, use, and storage of hazardous materials during operation of the site will be in strict adherence with all applicable state and federal laws. The Department of Toxic Substances Control (DTSC) permits the operation and design of California-only regulated hazardous materials facilities. Compliance with all applicable laws and regulations will reduce the impact associated with the routine transport, use, storage or disposal of hazardous materials to a less than significant level with mitigation incorporated. To ensure that potential impacts are less than significant the following mitigation plan will be adhered to.

Additionally, the facility will comply with applicable federal, State, and local hazardous material and hazardous waste management and use requirements. As such the facility will prepare and implement a set of Environmental Standard Operating Procedures to address hazardous materials management, hazardous waste management, air quality compliance, wastewater compliance, stormwater pollution prevention, spill prevention, countermeasures, and control, and emergency response.

**HAZ-1**

The California Hazardous Waste Management Units are show on **Figure 03** Site Map. This area will be issued a Standardized Hazardous Waste permit by the State of California Department of Toxic Substances Control (DTSC). These permits are issued with strict compliance to the California Code of Regulations Title 22 and the Health and Safety Code. These regulations and laws govern the construction, management and closure of hazardous waste facilities. These insure that the facility is constructed, and managed to minimize the potential for harm to human health and the environment.

Operational plans required with a Standardized permit include a Contingency Emergency plan. This plan describes the procedures to be followed in the event of fire, explosion, earthquake, spill or material release. It describes the responsibilities of the emergency coordinator and the facility operator.

An Inspection schedule and checklist must be prepared for inspecting the facility.

A training schedule and logs describe the type and frequency of trainings.

A security plan must be prepared, approved and followed to maintain security at the facility.

Specific regulations regarding manifesting, reporting, land disposal restrictions and facility management practices must be followed.

Studies must also be performed regarding earthquake and flood hazards.

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

A Waste analysis Plan (WAP) will be prepared and approved by the DTSC. This plan describes in detail how waste materials will be accepted at the facility. The generator of a waste will complete a generator waste profile form. This form will be examined for acceptability. Once approved the waste can be scheduled to be received. When the waste arrives at the facility the hazardous waste manifest is presented. The manifest is compared to the profile for any discrepancies. The waste is sampled and tested for acceptability. Once the analysis is complete and waste is approved for acceptance the tank truck is moved into the off-loading area and attached to the storage tanks and the waste removed from the truck. The WAP governs what the different waste streams will be analyzed for and how often, and what the acceptable parameters are for the different waste streams.

Operating records are required to be maintained. These will maintain record of the wastes received, where they are stored within the facility at all times, any analysis performed, consolidation records, and the identification of the facility that wastes are shipped to.

A closure plan is required, this is an analysis performed by a third party to determine the requirements to close the hazardous waste facility. That is to remove any remaining wastes onsite, decontaminate the facility and equipment, and to perform verification analysis. The value that is determined for closure must be made available through insurance, bond or trust account.

VII.b The Hazardous Materials Management Act (HMMA) requires that businesses handling or storing certain amounts of hazardous materials prepare a Hazardous Materials Business Emergency Plan (HMBEP), which includes an inventory of hazardous materials stored on site (above specified quantities), an emergency response plan, and an employee training program. An HMBEP is a written set of procedures and information created to help minimize the effects and extent of a release or threatened release of a hazardous material. The intent of the HMBEP is to satisfy Federal and State Community Right-to-Know laws and to provide detailed information for use by emergency responders. Per the California Health and Safety Code (HSC), Chapter 6.95, Section 25500–25532, an HMBEP must be submitted by any business that handles a hazardous material or a mixture containing a hazardous material in quantities equal to, or greater than:

- A total weight of 500 pounds or a total volume of 55 gallons;
- 200 cubic feet of a compressed gas at standard temperature and pressure; and/or
- A radioactive material handled in quantities for which an emergency plan is required pursuant to Parts 30, 40, or 70 of Chapter 10, Title 10, Code of Federal Regulations (CFR), or equal to or greater than the amounts specified above, whichever amount is less.

An HMBEP must be prepared prior to facility operation. Any business subject to HMBEP requirements shall submit an amendment of their HMBEP to the local implementing agency when there is:

- A 100 percent or more increase in the quantity of a previously disclosed hazardous material;
- Any handling of a previously undisclosed hazardous material subject to the inventory requirements;

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

- Change of business address;
- Change of ownership;
- Change of business name; and/or
- Change of contact information.

For businesses within San Bernardino County, HMBEPs are submitted to and approved by the San Bernardino County Fire Department, Hazardous Materials Division. Exposure to hazardous materials during the operation of the proposed on-site uses may result from (1) the improper handling or use of hazardous substances; (2) transportation accident; or (3) an unforeseen event (e.g., fire, flood, or earthquake). The severity of any such exposure is dependent upon the type and amount of the hazardous material involved; the timing, location, and nature of the event; and the sensitivity of the individual or environment affected.

As previously stated, the USDOT Office of Hazardous Materials Safety under Title 49 of the CFR and Title 13 of the CCR, have established strict regulations for the safe transportation of hazardous materials. As previously stated the DTSC under Title 22 Division 4.5 of the CCR, have establish strict regulations for the safe design and operation of California-only regulated hazardous materials.

As previously stated, both the Federal Government and the State of California require all businesses that handle more than a specified amount of hazardous materials or extremely hazardous materials, to submit an HMBEP to its local Certified Unified Program Agency (CUPA). The CUPA with responsibility for San Bernardino County is the San Bernardino County Fire Department, Hazardous Materials Division<sup>21</sup>. The HMBEP must include an inventory of the hazardous materials used in the facility, and emergency response plans and procedures to be used in the event of a significant or threatened significant release of a hazardous material. The HMBEP must include the Material Safety Data Sheet for each hazardous and potentially hazardous substance used. The Material Safety Data Sheets summarize the physical and chemical properties of the substances and their health impacts. The plan also requires immediate notification to all appropriate agencies and personnel of a release, identification of local emergency medical assistance appropriate for potential accident scenarios, contact information of all company emergency coordinators of the business, a listing and location of emergency equipment at the business, an evacuation plan, and a training program for business personnel.

HMBEPs are designed to be used by responding agencies, such as the San Bernardino County Fire Department during a release to allow for a quick and accurate evaluation of each situation for an appropriate response. HMBEPs are also used during a fire to quickly assess the types of chemical hazards that fire-fighting personnel may have to deal with, and to make decisions as to whether or not the surrounding areas need to be evacuated. Compliance with existing law will ensure that no significant impacts pertaining to the creation of hazards affecting the public will occur. The handling of hazardous materials in accordance with the

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<sup>21</sup> CUPA Directory Search, <http://www.calepa.ca.gov/CUPA/Directory/default.aspx>, website accessed February 6, 2012.

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

HMBEF as required by applicable local, state, and federal standards, ordinances, and regulations would ensure that impacts associated with environmental and health hazards related to an accidental release of hazardous materials are less than significant with the following mitigation measures implemented.

**HAZ-2**

A Standardized Permitted hazardous waste facility must provide compliance with The Hazardous Materials Management Act (HMMA). This is accomplished with the following plans and procedures:

1. A Hazardous Materials Business Emergency Plan (HMBEF) filed with the local Certified Unified Program Agency (CUPA) and maintained up-to-date and filed online with the California Electronic Reporting System (CERS).
2. A Spill Prevention Control and Countermeasures (SPCC) plan. This plan is maintained up-to-date at the facility. This plan outlines the secondary containment, emergency procedures and inspections required to prevent and control unplanned releases of petroleum products at the facility.
3. An Aboveground Petroleum Storage Tank statement. This registers all petroleum storage containers of 55 gallons and larger and declares compliance with the SPCC. This is maintained up-to-date with the local CUPA.
4. A Facility Contingency and Emergency Plan. This plan is maintained as a part of the Standardized permit. It describes the procedures to be followed in the event of an emergency at the facility. It identifies the emergency coordinator and facility operator and describes their respective functions and authority during an emergency. This plan also contains the Employee Handbook that outlines the employees' responsibilities and procedures during an emergency.
5. A Training Plan that outlines the training required for each of the different positions held at the facility. It describes when and how often training must be performed, and where the training records will be maintained.
6. An Inspection Plan describes the inspection schedule at the facility, how often inspections are performed and where the inspections are maintained.

The Standardized Permit is the master enforcement document that includes each of these individually approved documents. It includes the construction specifications of the facility and its secondary containment, and must be inspected by the DTSC prior to operations beginning. Prior to the permits approval there is a public comment period, and a public notice period. All of which are designed to provide for a safe operating facility that will protect human health and the environment.

VII.c The nearest existing school to the project site is Vermont Elementary School, which is located at 3695 Vermont Street, approximately 0.66 mile to the southwest of the project site. There are no existing or proposed schools located within a quarter mile of the project site. In the absence of an existing or proposed school within a quarter mile of the project site, no impact would occur, and no mitigation would be required.

VII.d The Department of Toxic Substance Control (DTSC), which designates the sites for the Hazardous Waste and Substance Site (Cortese) List, does not indicate any underground

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

storage tanks, hazardous waste generators, landfills, or other potentially hazardous materials located on the site<sup>22</sup>. The project site and adjacent sites were not listed in any of the databases searched, including the Cortese list. This research concludes that the potential for contamination on the project site is relatively low, no impact would occur related to this issue, and no mitigation is required.

- VII.e The San Bernardino International Airport (SBIA) is located approximately 7.3 mile southeast of the project site. As identified in the City’s General Plan, the project site is not located within the San Bernardino International Airport Influence Area.<sup>23</sup> The Rialto Municipal Airport is 3.8 miles southwest of the project site. This airport is approved for redevelopment as an industrial park. The proposed project is not located within an airport land use plan, nor within 2 miles of a public airport or public use airport. Therefore, there is no impact with regards to this issue and no mitigation is required.
- VII.f The proposed project, including all structures and facilities, has been designed, sited, constructed, and maintained in accordance with applicable emergency response evacuation standards set by the City. Only limited construction related to the installation of the biodigester is proposed. The majority of the operations will be conducted within the existing buildings and structure. As a result, no impact related to this issue would occur; therefore, no mitigation is required.
- VII.g The City has identified a Fire Overlay District (FOD) to mitigate the spread of fire, to minimize property damage, and to reduce the risk to public health and safety. The fire hazard within each zone varies based on slope, type of fuel present, and natural barriers. As identified in the City’s General Plan, the project site is not located in a fire hazard area.<sup>24</sup> Therefore, no impacts associated with this issue are anticipated to occur and no mitigation is required.
- VII.h The City has periodic, extremely high winds, which have in the past resulted in significant property damage, including roof and block wall damage, damaged power lines and traffic signals, and downed trees. The most significant wind problems occur at the mouths of canyons and valleys extending downslope from the San Bernardino Mountains. As identified in the City’s General Plan, the project site is located within a “High Wind Area.”<sup>25</sup> Since the project site is a current development with only limited construction proposed as part of the installation of the biodigester, and the current development meets all current building codes and complies with the General Plan, no impacts associated with this issue are anticipated to occur and no mitigation is required.

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<sup>22</sup> www.envirostor.dtsc.ca.gov & geotracker.waterboards.ca.gov sites accessed and searched January 2014

<sup>23</sup> City of San Bernardino General Plan Figure LU-4, City of San Bernardino, November 1, 2005

<sup>24</sup> Figure S-9: Fire Hazard Area, City of San Bernardino General Plan, November 2005.

<sup>25</sup> Figure S-8: High Wind Area, City of San Bernardino General Plan, November 2005.

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

<b>VIII. HYDROLOGY AND WATER QUALITY - Would the project:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 that 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 site or off site during construction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 site or off site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of post-construction polluted runoff, such as from areas of material storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas, loading docks, or other outdoor areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Otherwise substantially degrade water quality or beneficial uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury, or death involving flooding as a result of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or property to inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

*Discussion*

VIII.a The City implements National Pollutant Discharge Elimination System (NPDES) requirements for surface water discharge for all qualifying projects. The NPDES permit program was established under Section 402 of the Clean Water Act, which prohibits the unauthorized discharge of pollutants, including municipal, commercial, and industrial wastewater discharges.

The limited construction activities associated with the installation of the biodigester will not trigger any coverage under the State of California General Permit for the discharge of stormwater associated with construction activity.

The State of California has adopted an NPDES Industrial General Plan. The long term operational plan of the proposed project will require coverage from the State Water Resources Control Board (SWRCB) under a State of California General Permit for the discharge of stormwater associated with industrial activities. The facility is required to file a Notice of Intent to obtain coverage under the general permit and to prepare and implement a Stormwater Pollution Prevention and Monitoring Plan (SWPPP).

A SWPPP is a written document that describes the industrial operator's activities to comply with the requirements in the NPDES permit. The SWPPP is intended to facilitate a process whereby the operator evaluates potential pollutant sources at the site and selects and implements BMPs designed to prevent or control the discharge of pollutants in storm water runoff. The implementation of the SWPPP includes monitoring, analysis and reporting requirements. The SWPPP and all related documents will be maintained onsite and available to inspectors from the City and the Regional Water Quality Control Board.

After approval of the proposed project and prior to any industrial activities an Industrial NOI will be filed and the SWPPP will be prepared.

With implementing the measures included in the SWPPP industrial permit, there will be less than significant impact to potential water quality, and no additional mitigation is required.

Spill containment of the interior of the Food-Industry Wastewater Treatment space will be accomplished by a perimeter trench that surrounds the entire processing area which houses storage tanks, filters and augers. In the event of spills, liquids flow to the trench drains and the wastewater will be stored in an underground pit where it will be pumped back into the wastewater storage tanks prior to discharge into the public sewer system. Additionally, a system of 3" high perimeter containment berms will be installed in the interior of the building at all door openings.

On Page 8 of **Appendix 3** the Odor Management Plan and mentioned in Section IIIe herein, the new facility will have controls for potential spills of the non-hazardous

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

liquid food industry wastewater and cooking oil. The New Plant is equipped with automatic controls that will monitor tank levels and will stop filling the tanks when the quantity in the tank reaches a predetermined volume. The computerized controls will also immediately shut down operations in the event of a process upset, reducing the potential for overflows and spills.

The proposed Biodigester located on the site exterior will utilize preventative spill countermeasures: (a) the tanks are fabricated and anchored to strict seismic standards according to the 2013 CBC; therefore, the likelihood of rupture is extremely remote, (b) all the piping is above ground and is also designed for seismicity with flexible connections, (c) the Biodigester plumbing system has low pressure indicators; in the event of leaks the system shuts off. It should be noted that in the very remote chance of spills, the feedstock (slurry generated from food-industry wastewater) that is pumped into the biodigester contains non-toxic biodegradable fluids and would be disposed of by a qualified pumping contractor.

In regards to the Hazardous Waste streams, a Spill Prevention Control and Countermeasures (SPCC) plan is required for the Hazardous Waste Facility. It is premature to draft this plan now inasmuch as the Hazardous Waste Facility is not permitted yet and is not scheduled to be constructed for another 18 months. California regulated Hazardous Waste Facilities are regulated by fire code and hazardous material management codes, statutes, and regulations. The requirements for secondary containment are based on the applicable codes and are not discretionary. Therefore, Co-West will have a Spill Prevention and Countermeasures plan (SPCC which will include information regarding the secondary containment systems to be used and spill response procedures once the permitting with the Dept of Toxics and the other agencies is under way. Nevertheless, the spill containment for the Hazardous Material bulking and shipping area is achieved by a system of perimeter containment curbs interior of the building and raised 3" curbs at all door openings.

Inasmuch as all protocols required by California Department of Toxic Substances Control, Standardized permit process will be met, the impact will be less than significant.

In summary, with the spill containment elements designed as part of the building interior and noted on the Tenant Improvement plans, the biodigester tanks fabricated and anchored to strict seismic standards providing a very remote possibility of tank rupture, equipment installed with automated shut-off systems and controls that will monitor tank levels and a SPCC plan in compliance with California-Regulated Hazardous Waste requirements, we conclude that there will be less than significant impact to potential water quality and that no additional mitigation is required.

- VIII.b The San Bernardino Municipal Water Department's (SBMWD) 2010 Urban Water Management Plan (UWMP) Update (December 2012) documents water supply reliability and outlines water use efficiency measures adopted to ensure adequate water supply in the service area. Included in the UWMP is an estimate of future needs based on population

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

growth in the City. The UWMP identifies additional customers between 2010 and 2015, based on the amount of vacant land remaining in the City. As the proposed project was developed prior to the UWMP and is consistent with existing land use designations utilized to determine future water demand, the proposed project would be included in the SBMWD's determination of future water demand.

The SBMWD produces its water supply from groundwater wells located throughout its service area. Recharge of the aquifer is generally through local precipitation and by stream flow from rain and snowmelt from the San Bernardino Mountains watershed. Direct additions to or withdrawals of groundwater via wells are not elements of this project. The project site is located within the Bunker Hill Groundwater Basin of the Upper Santa Ana River Watershed. The proposed site is a previously developed industrial site. The proposed project will not decrease storm water percolation below currently approved and accounted for levels.

The proposed project would not interfere with groundwater recharge as the project site is not identified as a groundwater recharge area. As the proposed project was developed prior to the

UWMP and is consistent with existing land use designations utilized to determine groundwater recharge rates, the proposed project would be included in the SBMWD's determination of groundwater recharge. Therefore, the proposed project would not interfere with groundwater recharge activities. There are no impacts associated with this issue and no mitigation measures are required.

- VIII.c The proposed project only includes limited construction activities related to the installation of the biodigester on an already developed site. No alterations of existing drainage patterns, streams or rivers will occur. Therefore there is no impact relating to this issue and no mitigation is required.
- VIII.d The proposed project only includes limited construction activities related to the installation of the biodigester on an already developed site. No alterations of existing drainage patterns, streams or rivers will occur. Therefore there is no impact relating to this issue and no mitigation is required.
- VIII.e The installation of impermeable surfaces, such as buildings and pavement, generally increase the velocity and volume of surface runoff. As urban runoff flows over landscaped turf areas, parking areas, sidewalks and streets, it carries off pollutants such as automobile oil and antifreeze, pesticides, animal waste, and litter into the storm drain system. The storm drain system collects water from the streets and transports it directly or indirectly to local water supplies and eventually the Pacific Ocean. Urban runoff from the storm drains is typically not filtered or treated.

Federal environmental regulations based on the CWA require the control of pollutants from Municipal Separate Storm Sewer Systems (MS4s), construction sites and industrial activities. MS4s include drainage systems owned and maintained by the City of San Bernardino. Discharges from such sources were brought within the NPDES permit process by the 1987

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

Clean Water Act amendments and the subsequent 1990 promulgation of storm water regulations by the U.S. Environmental Protection Agency. The proposed project only includes limited construction activities related to the installation of the biodigester on an already developed site, and because the project proponent would be required to adhere to storm drainage requirements found within the NPDES permit process, the DTSC permit process, the HMBEP as well as provisions required by the City of San Bernardino, no impact related to this issue is anticipated to occur with the implementation of the proposed project. “A Notice of Intent will be submitted to the State Water Quality Board 30 days prior to operations commence, and a Storm Water Pollution Prevention Plan will be prepared and followed in accordance with NPDES General Permit CAS000001”. No mitigation is required.

VIII.f Please refer to the Response to Checklist Response VIIIa. The proposed project only includes limited construction activities related to the installation of the biodigester on an already developed site. In accordance with the industrial NPDES permits, by SIC codes industries are required to implement an SWPPP and Best Management Practices (BMPs). “A Notice of Intent will be submitted to the State Water Quality Board 30 days prior to operations commence, and a Storm Water Pollution Prevention Plan will be prepared and followed in accordance with NPDES General Permit CAS000001”. There is no impact associated with this issue and no mitigation is required.

VIII.g As the proposed project is not located within an area identified as being subject to flood hazards, either by the City of San Bernardino (Figure S-1 of the General Plan) or the Federal Emergency Management Agency<sup>26</sup>, the proposed project would not impede or redirect flood flows. No impact related to this issue is anticipated to occur with the implementation of the proposed project. No mitigation is required.

VIII.h Flood control in the City provides an integrated approach for regional and local drainage flows. This system includes debris basins, storm channels, and levees. The project site is not located within a 100-year flood hazard area, nor within a 500-year flood hazard area. There are no impacts related to this issue and no mitigation is required.

VIII.i The project site is not located near or adjacent to a lake or ocean; therefore, there is no potential for inundation of the site by a seiche (a wave or oscillation of the surface of water in an enclosed or semi-enclosed basin) or tsunami. Because the project is not in close proximity to any large, enclosed bodies of water (e.g., ocean, lake, or river) and is generally flat with no nearby mountainous areas, potential impacts resulting from tsunamis, seiches, or mudflows are not anticipated to occur. No impact associated with these issues will occur and no mitigation is required.

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<sup>26</sup> Flood Zone X, FEMA Flood Insurance Rate Map 06071C7940H, Federal Emergency Management Agency, August 28, 2008.

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

<b>IX. LAND USE AND PLANNING - Would the project:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>a)</b> Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>b)</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 checked="" type="checkbox"/>	<input type="checkbox"/>
<b>c)</b> 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"/>
<b>d)</b> Be developed within the Hillside Management Overlay District?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>e)</b> Be developed with Foothill Fire Zones A and B, or C as identified in the City's General Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>f)</b> 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"/>

*Discussion*

**IX.a** The proposed project site is an existing industrial site. The proposed project only includes limited construction activities related to the installation of the biodigester on an already developed site. There are no residence uses located in or around the proposed site. The proposed project would not physically divide an established community, therefore there is no impact and no mitigation is required.

**IX.b** The applicable land use plan governing the proposed project site is the City of San Bernardino General Plan (City of San Bernardino 2005). Other applicable regional plans developed by the Southern California Association of Governments (SCAG) include the Regional Comprehensive Plan [SCAG]

2008b: (RCP)] and Regional Transportation Plan [SCAG 2008a: (RTP)]. The project site is currently designated Industrial in the General Plan and zoned IL (Light Industrial).

The SCAG has prepared the 2008 RCP to serve as a framework to guide decision-making with respect to the growth and changes that can be anticipated in the region. The RCP is a major advisory plan prepared by the SCAG that addresses important regional issues such as housing, traffic/transportation, water, and air quality. The RCP serves as an advisory document to local agencies in the Southern California region for their information and voluntary use for preparing local plans and handling local issues of regional significance.

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

The RCP's overall goal is to reinvigorate the region's economy, avoid social and economic inequities and the geographical dislocation of communities, and to maintain the region's quality of life. The document is described as a regional policy framework for future land use decisions in the SCAG area that respects the need for strong local control, but that also recognizes the importance of regional comprehensive planning for issues of regional significance.

Formulation of the RCP is based on input from local jurisdictions based on what is contained within their respective General Plans. The proposed project would be generally consistent with the City's existing General Plan. When the RCP was formulated the growth anticipated under both an OIP designation and IL designation was similar. As such, implementation of the proposed project would not result in unanticipated growth referenced in the RCP. Impacts are less than significant.

The 2008 RTP adopted by the SCAG in May 2008 contains a set of existing socioeconomic projections used as the basis for the SCAG's transportation planning efforts. They include projections of population, housing, and employment at the regional, county, sub-regional, jurisdictional, Census tract, and transportation analysis zone levels. The RTP includes policies and regulations set forth to ensure development within the SCAG regional area is within planned and forecast socioeconomic projections.

The proposed project is consistent with the RTP in that it would be required to adhere to the City of San Bernardino's General Plan. The General Plan contains goals and policies that aim to minimize traffic congestion, provide adequate transportation facilities, and require development to pay its share of costs. The goals and policies identified in the City's General Plan resemble those of the RTP that address mobility, traffic safety, environmental concerns, and land use consistency as the major traffic study factors to identify existing traffic conditions and to assess the future effects on area traffic patterns/flow. Furthermore, the project will be consistent with the General Plan and, since the General Plan is required to be consistent with the RTP, it is reasonable to infer that the project is consistent with policies set forth in the RTP.

Based on this, potential impacts are less than significant and no mitigation is required.

- IX.c The project site is located in an urban area that is not within an established habitat conservation plan or natural community conservation plan. No impact associated with this issue will occur; therefore, no mitigation is required.
- IX.d The project is not located within the City's Hillside Management Overlay District (HMOD). As such, no impact associated with this issue will occur, and no mitigation is required.
- IX.e No portion of the proposed project is located within a Fire Zone<sup>27</sup>. The proposed project would be required to adhere to all applicable Fire Codes. Impacts from this project with regard to exposure to fires would be lowered to a level of less than significant.

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<sup>27</sup> General Plan Figure S-9 "Fire Hazard Areas," City of San Bernardino, November 2005.

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

IX.f The proposed project site is not located within the “Airport Influence Area” for the San Bernardino International Airport (SBIA). The SBIA has identified “Airport Influence Areas” in the areas surrounding airport property<sup>28</sup>. There are no impacts associated with this issue and no mitigation is required.

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<sup>28</sup> *Airport Influence Area, Runway (24/6) Category D-VI (Map)*, San Bernardino International Airport Authority, December 4, 2003.

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

<b>X. MINERAL RESOURCES - Would the project:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of 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 locally important mineral resource recovery site delineated on a local general plan or other land use?	<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 Geology Board and identified in the City's General Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*Discussion*

X.a-c Mineral extraction is an important component of San Bernardino's economy. According to the General Plan<sup>29</sup>, the bulk of the construction aggregate is found in the natural sand and gravel deposits of Cajon Wash, Lytle Creek, Warm Creek, City Creek, and the Santa Ana River. In 1975, the California State legislature adopted the Surface Mining and Reclamation Act (SMARA). This designated certain areas as Mineral Resources Zones (MRZs) that were of State-wide or regional importance. Several areas within the San Bernardino region have been classified as MRZ-2. The proposed project site is in an area designated MRZ-2, area where geologic data indicate that significant PCC-Grade aggregate resources are present<sup>30</sup>.

The State Geologist is responsible for identifying and calculating the amount of aggregate resources contained in areas classified as MRZ-2. Recognizing that there are lands within these areas that have already been urbanized, and therefore the mineral resources within them have a limited opportunity for conservation, development, and utilization, the State Geologist further limits the aggregate resource calculations to areas within "Sectors."

Sectors are areas that have been classified as MRZ-2 by the State Geologist, and that have current land uses deemed compatible with potential mining based on criteria provided by the Board. Compatible land uses are defined as those that are non-urbanized or that have very low-density residential developments (one dwelling unit per ten acres or less), land without high-cost improvements, and land used for agriculture, grazing, or open space. Urbanization and/or incompatible land uses are defined as improvements of high cost, such as high-density residential developments, intensive industrial developments, commercial developments, and major public facilities. The proposed project site is not within a Sector.<sup>31</sup>

The proposed project is currently a developed industrial site and no construction beyond current conditions will occur, the proposed project would not result in a loss of availability of known mineral resources that would be of value to the region and the residents of the state.

<sup>29</sup> City of San Bernardino General Plan (November 2005).

<sup>30</sup> Special Report 206, Updated Mineral Land Classification Map for Portland Cement Concrete-Grade Aggregates, California Geological Survey, 2008

<sup>31</sup> Special Report 206, Updated Aggregate Resource Sector Map for Portland Cement Concrete, California Geological Survey, 2008

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

The proposed project would also not result in the loss of a locally-important mineral resource recovery site. No mineral extraction activities occur on site. No impact related to this issue would occur and no mitigation is required.

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

<b>XI. NOISE - Would the project:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exposure of persons or generation of noise levels in excess standards established in the City’s General Plan or Development Code, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise level in the project vicinity above existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) A substantial or periodic increase in ambient noise levels in the project vicinity above existing without the project?	<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 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"/>

*Discussion*

XI.a **Noise Impact Assessment.** The project site is located in an area of the City that is developing with industrial uses. The City specifies the maximum acceptable exterior community noise equivalent level (CNEL) for industrial uses in the City shall not exceed 75 decibels (dB) while interior noise levels shall not exceed CNEL 72dB. The CNEL is a 24-hour A-weighted average sound level from midnight to midnight obtained after the addition of 5 decibels (dB) to sound levels occurring between 7:00 p.m. and 10:00 p.m. and 10 dB to the sound levels occurring between 10:00 p.m. and 7:00 a.m.<sup>1</sup> The 5 dB and 10 dB penalties added to the evening and nighttime hours account for the added sensitivity of humans to noise during these time periods.

**Construction-Related (Short-Term) Noise Impacts.** The proposed project includes minimal construction activities. There would be no impact from construction related (Short-Term) noise.

**Operational (Long-Term) Noise Impacts.** The closest residence to the proposed project site is 804 feet from the property line; however, this residence is obstructed by a distribution/warehouse at 424 feet and the Burlington Northern railway line at 200 feet from the residences. There are five residences at 840 feet from the property line that are not obstructed by any buildings; however, the Railway is 200 feet from the residences. During operation over 99% of the truck activity will occur on the south side of the building, in an area fully obstructed from the residences by the distribution/warehouse and the railway line. Observations taken during Industrial working hours shows that ambient background sound pressure levels (SPL) are 48-59dB measured at the street near the residences. The suspected

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

source of these noise levels is from the grain elevator of the pet food manufacturer located in the same area. Approximately 154 cars/light trucks, 6 Truck tractors, and 2 freight trains pass by each hour. The SPL range from 51-81dB during this time. If there were no obstructions the SPL of any trucks at the proposed project site would be reduced to <30dB just by the distance of over 800 feet to the sound source. This is well below the background levels and well below the CNEL. The micro turbines at full load produce 65 dB at a distance of 33 feet. With the obstructions that exist between the proposed site and the residences, the SPL from the operation would not generate an impact with this issue, no mitigation is required.

- XI.b      Vibration refers to ground borne noise and perceptible motion. Ground borne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors, where the motion may be discernable but without the effect associated with the shaking of a building there is less of a reaction. Typical sources of ground borne vibration are construction activities (e.g., blasting, pile driving, and operating heavy duty earthmoving equipment), steel-wheeled trains, and occasional traffic on rough roads. Problems with ground borne vibration and noise from these sources are usually localized to areas within about 100 feet from the vibration source. When roadways are smooth, vibration from traffic, even heavy trucks, is rarely perceptible. It is assumed for this project that the roadway surface would be smooth enough that ground borne vibration from street traffic would not exceed the impact criteria. All asphalt surfaces on the proposed project site will be maintained in good smooth order to that vibration from traffic would not exceed the impact criteria.
- No equipment identified as generating ground borne vibrations will be utilized in the long-term operations. The impact of this issue is less than significant, no mitigation is required.
- XI.c      The proposed project site is a currently developed industrial site. The previous land use was a furniture manufacturer. As any approved conditional use permit would comply with the Light Industrial zoning there cannot be any substantial permanent increase in ambient noise level in the project vicinity than if this project were not approved. There is no impact related to this issue.
- XI.d      See response to item XI.c above.
- XI.e      The nearest airport to the project site is the Rialto Municipal Airport which is 3.8 miles southwest of the project site. This airport is approved for redevelopment as an industrial park and will be replace at some time in the future. The San Bernardino International Airport (SBIA) is located approximately 7.3 mile southeast of the project site. As identified in the City's General Plan, the project site is not located within the San Bernardino International Airport Influence Area.<sup>32</sup> The proposed project is not located within an airport land use plan, nor within 2 miles of a public airport or public use airport. Therefore, there is no impact with regards to this issue.

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<sup>32</sup> City of San Bernardino General Plan Figure LU-4, City of San Bernardino, November 1, 2005.

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

<b>XII. POPULATION AND HOUSING - Would the project:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>a)</b> Induce substantial growth in an area either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure?)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>b)</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"/>

*Discussion*

XII.a-b The proposed project involves the relocation of an existing City of San Bernardino business. The current and existing jobs would remain with no substantial increase or displacement. The proposed project site is an existing industrial site. Limited construction activities associated with the installation of the biodigester; however, this construction is limited and expected to occur over a short period of time with no long term impacts. No roads or infrastructure beyond current existing conditions are required. As a result, there is no impact relating to these issues.

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

<b>XII. PUBLIC SERVICES - Would the project:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service rations, response times, or other performance objectives for any of the public services?</b>				
Fire protection, including medical aid?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks or other recreational facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other governmental services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*Discussion*

**XIII Fire Protection and Medical Aid.** The proposed project site and surrounding areas have been operating as a developed industrial site since approximately 1995.

Fire protection services are provided by San Bernardino City Fire Department (SBFD). Currently, the SBFD responds to calls within the project area from Fire Station 232, located at 6065 Palm Avenue in San Bernardino. Station 232 is located approximately 2.1 miles north of the project. Support for Station 232 would be supplied as required by other City stations. Any response to vegetation fires would be augmented by California Department of Forestry and the United States Forest Service. The building is fully equipped with an automatic fire sprinkler system.

Emergency medical services to the project site would likely be provided by American Medical Response (AMR). Each ambulance unit is staffed by one emergency medical technician (EMT) and one paramedic. Paramedics are permitted to administer drugs, initiate airway treatments, and employ defibrillation equipment. While the medical facility to which patients would be transported would vary depending on the severity of the incident, the most likely medical facility to accept patients from the proposed project is Community Hospital of San Bernardino a full-service medical facility located approximately 3.7 miles from the project site. The approval of the proposed project would not create new demands for fire protection and medical aid beyond the currently approved levels.

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

**Police Protection.** The proposed project site and surrounding areas have been operating as a developed industrial site since approximately 1995. Police protection services are provided by the City of San Bernardino

Police Department (SBPD). The project site is located within the Northwest District B2 of the SBPD.<sup>33</sup> The proposed project would not increase the need for police protection, nor would it require the construction of new facilities to maintain acceptable service ratios, response times, or other performance objectives. The proposed project would result in no impact.

**School Facilities.** The proposed project site and surrounding areas have been operating as a developed industrial site since approximately 1995. The proposed project site is located within the San Bernardino City Unified School District (SBCUSD). The proposed project does not include the construction of residential dwelling units. As the project is the relocation of an existing San Bernardino business there is little potential for the employees to move within the vicinity of the project. It is not anticipated that the project would affect existing school services or facilities. In the absence of an impact, the construction of new facilities that would result in a significant environmental impact would not occur and no mitigation measures would be required.

**Recreation.** The project does not include recreation facilities. The proposed project site and surrounding areas have been operating as a developed industrial site since approximately 1995. Neighborhood or regional parks are not associated with industrial projects; therefore, there will be no impacts associated with recreation facilities from the proposed project.

**Other Services.** The proposed project site and surrounding areas have been operating as a developed industrial site since approximately 1995. The project is the relocation of an existing San Bernardino business there is little potential for the employees to move within the vicinity of the project.

The project would not cause an increase in population resulting in an impact on other public facilities such as Libraries and Hospitals.

All onsite access, parking areas, utilities, and structures would be maintained by the operator of the proposed facility.

The proposed project only includes limited construction activities related to the installation of the biodigester on an already developed site. As a result, the maintenance of public facilities and infrastructure will not be altered. The proposed project would not add any significant new public facilities that would require maintenance. There is no impact associated with this issue and no mitigation is required.

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<sup>33</sup> *Patrol District Map*, City of San Bernardino Police Department, [http://www.ci.san-bernardino.ca.us/cityhall/police\\_department/about\\_sbpd/the\\_patrol\\_districts/default.asp](http://www.ci.san-bernardino.ca.us/cityhall/police_department/about_sbpd/the_patrol_districts/default.asp)

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

<b>XIV. RECREATION - Would the project:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Increase the demand for neighborhood or regional parks or other recreational facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) 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"/>

*Discussion*

XIV.a-b The nearest existing park facility in the vicinity of the proposed project is Littlefield-Schultis Memorial Park at 5600 Buckboard Dr, 1/2 mile to the north. The proposed project site and surrounding areas have been operating as a developed industrial site since approximately 1995. The project is the relocation of an existing San Bernardino business there is little potential for the employees to move within the vicinity of the project. The project would not create a significant increase in population that would increase the demand of City recreational facilities. A less than significant impact related to this issue would occur and no mitigation is required.

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

<b>XV. TRANSPORTATION/CIRCULATION</b> <b>- Would the project:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a change in air traffic patterns, including an increase in traffic levels or a change in location that results in substantial risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to design feature (e.g., sharp curves of 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 checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*Discussion*

XV.a-b The proposed project site is an existing developed industrial site. The previous land use was a furniture manufacturer. The proposed project is the relocation of an existing San Bernardino business to this site. The proposed project only includes limited construction activities related to the installation of the biodigester on an already developed site. There are no proposed changes to existing traffic/circulation infrastructure beyond current conditions.

**Appendix 4** contains a copy of the *Traffic Technical Memorandum* prepared by TEP dated August 2014. The Traffic Technical Memorandum concludes that the project does not meet the thresholds set by SANBAG and the City of San Bernardino that would trigger the need for the preparation of a Traffic Impact Analysis report.

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

The forecasted build out site trip generation analysis when the biodigester is fully operational shows that the site trip generation will increase to 232 passenger car equivalents (PCE) trip ends. The a.m. peak hour site trip generation will increase by 6 PCE trip ends to 23. The p.m. peak hour will increase by 1 PCE trip end to 16. Most of the increase in the site trip generation is due to the potential addition of 13 new employees. One additional truck has been added based on the expectation that the on-site biodigester will generate a slight increase in deliveries. In addition, it is assumed in the future that there will continue to be one shipment per day of effluent. However, realistically it is expected that there will only be 2 shipments per week of effluent from the project site. These assumptions concerning truck activity have been made in order to forecast a worst-case scenario for the build-out site trip generation. According to SANBAG and city of San Bernardino guidelines a project is required to prepare a TIA report if it generates 250 or more peak hour trips, or if it adds 50 or more peak hour trips to a County Congestion Management Plan (CMP) roadway. In addition, if a project is expected to add 50 or more peak hour trips to a state highway, it also may be required to prepare a Traffic Impact Analysis (TIA). Industrial, warehousing and truck projects are required to convert truck trips to PCEs before applying these thresholds. The Co-West project proposal does not meet the thresholds set by SANBAG nor the City of San Bernardino that would trigger the need for preparation of a TIA report.

No impacts related to this issue would occur and no mitigation is required.

XV.c The nearest airport to the project site is the Rialto Municipal Airport which is 3.8 miles southwest of the project site. This airport is approved for redevelopment as an industrial park and will be replaced at some time in the future. The San Bernardino International Airport (SBIA) is located approximately 7.3 mile southeast of the project site. As identified in the City's General Plan, the project site is not located within the San Bernardino International Airport Influence Area<sup>34</sup>. The proposed project is not located within an airport land use plan, nor within 2 miles of a public airport or public use airport. Therefore, there is no impact with regards to this issue.

XV.d The proposed project site is an existing developed industrial site. The previous land use was a furniture manufacturer. The proposed project is the relocation of an existing San Bernardino business to this site. The proposed project only includes limited construction activities related to the installation of the biodigester on an already developed site. There are no proposed changes to existing traffic/circulation infrastructure beyond current conditions.

Proposed projects within the City of San Bernardino are required to adhere to the City of San Bernardino Public Works Department's policies and guidelines as contained in the Traffic Engineering Design Policies and Procedures. These policies and guidelines dictate the construction of additional roadway infrastructure as well as procedures for submittal, review, and approval of a project's circulation system.

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<sup>34</sup> *City of San Bernardino General Plan Figure LU-4, City of San Bernardino, November 1, 2005.*

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

Adherence to applicable City standards would ensure that no significant roadway design- or hazard-related impact occurs.

The proposed project would be located within an area that is planned and currently used for industrial development. Vehicular use is expected to consist of employee passenger vehicles as well as heavy duty trucks. Long-term heavy-duty truck use is anticipated to occur with the proposed project as it does with the surrounding uses; therefore, no incompatibility with existing or future traffic would occur.

- XV.e The proposed project site is an existing developed industrial site. The previous land use was a furniture manufacturer. The proposed project is the relocation of an existing San Bernardino business to this site. The proposed project only includes limited construction activities related to the installation of the biodigester on an already developed site. There are no proposed changes to existing traffic/circulation infrastructure beyond current conditions.

The design, construction, and maintenance of structure, roadways, and facilities must comply with applicable City standards related to emergency access and evacuation plans. City access control measures would reduce potential impacts related to this issue to a less than significant level.

- XV.f The proposed project site is an existing developed industrial site. The previous land use was a furniture manufacturer. The proposed project is the relocation of an existing San Bernardino business to this site. The proposed project only includes limited construction activities related to the installation of the biodigester on an already developed site. There are no proposed changes to existing traffic/circulation infrastructure beyond current conditions.

Most vehicles traveling to the proposed project site would potentially interact with OmniTrans route 11 for 1032 feet on University Parkway from I-215 to Hallmark Parkway. This interaction can occur twice an hour, once north bound and once south bound. There are two intersections at this interaction, both are controlled by traffic signals. This interaction would not be a significant increase beyond currently approved conditions.

An alternate route is to exit I-215 at Palm Avenue and travel south on Kendall. This route avoids all interaction at University Parkway.

Appendix 3 contains a copy of the *Traffic Technical Memorandum* prepared by TEP dated August 2014. The TEP concludes that the project does not meet the thresholds set by SANBAG and the City of San Bernardino that would trigger the need for the preparation of a Traffic Impact Analysis report.

The proposed project would comply with all City development policies, standards, and programs pertaining to supporting alternative modes of transportation; therefore, a less than significant impact related to this issue would occur.

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

<b>XVI. UTILITIES - Would the project:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the Santa Ana Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>

*Discussion*

XVI.a Local governments and water districts are responsible for complying with federal regulations, both for wastewater plant operation and the collection systems (e.g., sanitary sewers) that convey wastewater to the wastewater treatment facility. Proper operation and maintenance is critical for sewage collection and treatment as impacts from these processes can degrade water resources and affect human health. For these reasons, publicly owned treatment works (POTWs) receive Waste Discharge Requirements (WDRs) to ensure that such wastewater facilities operate in compliance with water quality regulations set forth by the state. WDRs, issued by the state, establish effluent limits on the kinds and quantities of pollutants that POTWs can discharge. These permits also contain pollutant monitoring, recordkeeping, and reporting requirements. Each POTW that intends to discharge into the nation's waters must obtain a WDR prior to initiating its discharge.

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

The proposed project is the relocation of an existing San Bernardino business to a currently developed industrial site. Both sites are serviced by the San Bernardino Water Reclamation Plant (SBWRP). Therefore there would not be an increase in demand on wastewater treatment plant and collection system.

Long-term operations of the liquid processing facility is covered by Industrial User Permit # C-1-0009-GE issued by the San Bernardino Municipal Water Department (SBMWD), Environmental Control Section. The operator is obligated to comply with all applicable pretreatment regulations, standards or requirements under local, State and Federal laws. The operator has contacted the SBMWD regarding the relocation of the business and do not foresee any delays in the issuance of an Industrial User Permit at the proposed project site. Co-West continues to work cooperatively with SBMWD to enhance compliance and ensure that applicable industrial wastewater treatment requirements are complied with continuously.

Compliance with condition or permit requirements established by the City, and waste discharge requirements at the SBWRP would ensure that discharges into the wastewater treatment facility system from the operation of the proposed project would not exceed applicable Santa Ana Regional Water Quality Control Board wastewater treatment requirements. Expected wastewater flows from the proposed project will not exceed the capabilities of the serving treatment plant, so no significant impact related to this issue would occur and no mitigation would be required.

XVI.b Wastewater flows from the proposed project site would be handled by the SBMWD and would be conveyed to the SBWRP located in the southern portion of the City.

The proposed project is the relocation of an existing San Bernardino business to a currently developed industrial site. Both sites are serviced by the SBMWD and the San Bernardino Water Reclamation Plant (SBWRP). Therefore there would not be an increase in demand on wastewater treatment plant and collection system.

The proposed project would not create additional demand on wastewater capacity sufficient to require the construction of new facilities. Because the amount of wastewater generated would be within the existing treatment capacity, the proposed project would not require the construction of a new water or wastewater treatment facilities or expansion of existing facilities, which could cause significant environmental effects; and impacts related to this issue would be considered less than significant.

Additionally, an independent evaluation was completed by RENCivil to further evaluate potential impacts of proposed sewer flows from the project on the existing sanitary sewer system in the area. The 14 October 2014 preliminary sewer study ("study") notes that the project site is served by an 8 inch sewer lateral that confluences with an existing 15 inch sewer trunk line that leads to the San Bernardino Water Reclamation Facility at 399 Chandler Place. The study notes that the existing sewer capacity is 202.9 gallons per minute. The projected flows from the project, when combined with existing flows in the area, are expected to range from approximately 80.3 gallon per minute to potentially as high as 187.9 gallons per minute, accounting for a maximum of 92.6% of the existing sewer capacity.

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

Typical combined sewer flow rates from the project and existing sources are expected to be closer to 100 gallons per minute, which is less than 50% of the existing sewer capacity.

- XVI.c There is existing storm drain infrastructure in the vicinity of the proposed project that is capable of accommodating existing storm water flows.

The proposed project site is an existing developed industrial site. The previous land use was a furniture manufacturer. The proposed project is the relocation of an existing San Bernardino business to this site. There are no impacts related to this issue and no mitigation is required.

- XVI.d The proposed project does not trigger the requirement for preparation of a water supply assessment (i.e., a development exceeding 500 residential units or equivalent) as established in Sections 10910–10912 of the California Water Code. Water service to the project site is provided by the SBMWD, which serves the City of San Bernardino.

The proposed project site is an existing developed industrial site. The previous land use was a furniture manufacturer. The proposed project is the relocation of an existing San Bernardino business to this site. The proposed project would not create additional demand on the local or regional water supply and distribution system sufficient to require the construction of new facilities. There are no impacts related to this issue and no mitigation is required.

- XVI.e See response to item XVI.b above.

- XVI.f The City of San Bernardino will provide solid waste collection services to the project site through the City of San Bernardino Refuse and Recycling Division. Solid waste collection is a “demand-responsive” service and current levels can be expanded and funded through user fees.

The proposed project site is an existing developed industrial site. The previous land use was a furniture manufacturer. The proposed project is the relocation of an existing San Bernardino business to this site.

Solid waste from the proposed project would be collected by the City of San Bernardino Refuse and Recycling Division. Non-recyclable solid waste from the proposed project would be collected and transported to the San Timoteo Sanitary Landfill, located in the City of Redlands. This is the same profile for the current business location.

The San Timoteo Sanitary Landfill has a daily permitted throughput of 1,000 tons per day, a remaining capacity of 11,360,000 cubic yards, and an estimated closure date of 2016<sup>35</sup>. Average daily throughput as of 2011 is estimated at 690 tons/day. The volume of solid waste generated by the proposed project per day would not increase beyond current levels. Approval of the proposed project would not significantly affect current operations or the expected lifetime of the landfill serving the project area. Therefore, no significant solid waste disposal impact would occur and no mitigation measures are required.

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<sup>35</sup> *Active Landfills Profile for San Timoteo Sanitary Landfill (36-AA-0087)*, CalRecycle website, <http://www.calrecycle.ca.gov/Profiles/Facility/Landfill/LFProfile1.asp?COID=36&FACID=36-AA-0087> website accessed on February 3, 2012.

**CITY OF SAN BERNARDINO  
PLANNING DIVISION  
INITIAL STUDY**

XV.g The proposed project would be required to comply with applicable elements of AB 1327, Chapter 18 (California Solid Waste Reuse and Recycling Access Act of 1991) and other applicable local, state, and federal solid waste disposal standards, thereby ensuring that the solid waste stream to the San Timoteo Sanitary Landfill is reduced in accordance with existing regulations. Impacts are considered less than significant and no mitigation measures would be required.

<b>MANDATORY FINDINGS OF SIGNIFICANCE</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*Discussion*

XVII.a No endangered or threatened species were identified on site during the biological resource surveys. As stated in Section IV, approval of the proposed project would not cause a fish or wildlife population to drop below self-sustaining levels or restrict the movement/distribution

**CITY OF SAN BERNARDINO**  
**PLANNING DIVISION**  
**INITIAL STUDY**

of a rare or endangered species. The proposed project will consist of limited construction activities on an existing, already developed site.

The proposed project would not affect any threatened or endangered species or habitat. No impacts to on-site biological resources will occur and no mitigation is required.

Based on the site's lack of potential for archaeological/historic data and the loss of historic integrity, the facility does not meet the definition of a "historic resource" under CEQA. In addition, the site is not connected with local historic personalities and lacks historical integrity. There are no known unique ethnic or cultural values associated with the site, nor are there any religious or sacred uses associated with the project site. Because the proposed site is not a "historic resource" and is not eligible for listing in either the National Register of Historic Places or the California Register of Historical Resources, no impact resulting from the proposed project would occur.

- XVII.b The proposed project site is located within an area has been designated by the City for industrial uses. The proposed project will consist of limited construction activities on an existing, already developed site.

Impacts related to air quality, noise, biological resources, geologic and soil conditions, hydrology and water quality, hazards and hazardous materials, archaeological/paleontological resources and traffic are less than significant with the proposed mitigation plans.

The cumulative effects resulting from build out of the City's General Plan were previously identified in the General Plan EIR. The type, scale, and location of the proposed project is consistent with City's General Plan and zoning designation and is compatible with the pattern of development that has been approved for adjacent properties. Because of this consistency, the potential cumulative environmental effects of the proposed project would fall within the impacts identified in the City's General Plan EIR. As no cumulative impact greater than that identified in the General Plan EIR would result from the occupation of the proposed industrial use, a less than significant impact is anticipated to occur.

- XVII.c As detailed in the preceding responses, approval of the proposed project would not result, either directly or indirectly, in adverse effects to human beings. No significant impacts are anticipated to occur with the implementation of the proposed project.