CITY OF SAN BERNARDINO
INITIAL STUDY FOR

CAJON ANCILLARY TRUCK TRAILER STORAGE AREA PROJECT
CITY OF SAN BERNARDINO, CALIFORNIA

November 22, 2010

PREPARED BY

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PREPARED FOR

City of San Bernardino
Development Service Department
300 North "D" Street
San Bernardino, CA 92418
909.384.5057

REVIEWED BY

Independently reviewed, analyzed and exercised judgment
in making the determination, by the Development/Environmental Review Committee on November 4, 2010, pursuant to Section 21082 of the California Environmental Quality Act (CEQA).

CITY OF SAN BERNARDINO
DEVELOPMENT SERVICES
INITIAL STUDY

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 nor a proposal, not exempt from CEQA, qualifies for a Negative Declaration or whether or not an Environmental Impact Report (EIR) must be prepared.

1. Project Title: Cajon Ancillary Truck Trailer Storage Area Project

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

3. Contact Person: Terri Rahhal
Phone Number: (909) 384-5057

4. Project Location (Address/Nearest cross-streets): Regionally, the Cajon Ancillary Truck Trailer Storage Area Project site is located in the County of San Bernardino, in the northwest portion of the City of San Bernardino (See Exhibit 1 – Regional Location). Specifically, the Project site is located west of Kendall Drive, directly north/east of the Burlington North Santa Fe (BNSF) and Union Pacific (UP) railroads, and directly south of the Cajon Distribution Center (CDC). (See Exhibit 2 – Local Vicinity Aerial Map). The property consists of Assessor's Parcel Number (APN) 0262-011-37 and 0262-011-05. The site is depicted on the San Bernardino County, California U.S. Geological Survey (USGS 7.5-minute) topographic map in Section 5, Township 1 and 2 North, and Range 5 West (Exhibit 3 – Local Vicinity Topographical Map). The Project site is located at 34° 12′23.35″ north latitude and 117° 23′13.73″ west longitude.

5. Project Sponsor: CT Realty Investors
Address: 65 Enterprise
Aliso Viejo, CA 92656

6. General Plan Designation: Light Industrial

7. Description of Project (Describe the whole action involved, including, but not limited to, later phases of the project and any secondary, support, or off-site feature necessary for its implementation. Attach additional sheets, if necessary): The proposed Project will be located on an approximately 8.8-acre site. Implementation of the Project will use the proposed Project site as an "ancillary use" storage yard for up to 300 additional truck trailers housed in conjunction with the CDC

facility, which is located directly northeast of the Project site (Exhibit 4 – Site Plan). In addition, a paved driveway will connect the CDC parking area to the Project site. Transfer of trailers will occur directly between the two properties on this connecting driveway and not via Cajon Boulevard.

Improvements to the Project site will consist of an asphalt-paved drive path, a series of rows of trailer parking stalls comprised of concrete aprons running parallel with the drive paths, providing a solid surface for placement of trailer landing gear. Additional improvements within the Project site will consist of a gravel-base located underneath the rows of trailer parking stalls, providing a permeable-surface. The entire trailer storage area will be secured by perimeter fencing and security lighting as required by the City of San Bernardino. In addition, access to the San Bernardino Municipal Water District property (located at 7010 N. Cajon Boulevard, directly east of the Project site) will be maintained independent of the Project site, with separate gated access via Cajon Boulevard. Construction of the Project is anticipated from January 2011 to March 2011 (three-month duration).

8. Surrounding Land Uses and Setting: The proposed Project site is located directly southeast of the CDC, which consists of a fully developed, two (2) building, and 1,419,710 square foot Class A industrial distribution complex. Building 1 is located at 7010 N. Cajon Boulevard and consists of 672,958 square feet, which includes 10,000 square feet of office space; and Building 2 is located at 7140 N. Cajon Boulevard and consists of 746,752 square feet, which includes 10,000 square feet of office space. The CDC currently contains parking for 695 commercial trailers.

The San Bernardino Municipal Water District (SBMWD) owns the approximately 8.4-acre Project site. The Project site is roughly triangular in shape and borders the Cajon Boulevard to the northeast, the BNSF and UP railroad to the south and southwest and the CDC to the northwest. In addition, an existing water tank is located directly southeast of the project site.

Between Cajon Boulevard and I-215 are dozens of long, fairly narrow lots extending the full length from Cajon Boulevard to I-215 Freeway, located approximately 100 yards northeast of the Project site. Some of these lots include single-family residential structures. Others are used as businesses or industrial sites.

The intersection of Palm Avenue with Kendall Drive is located about 1.8 miles southeast of the site. The southwestward extension of Palm Avenue is Institution Road, and the two meet at Cajon Boulevard. Institution Road heads into and terminates at the Lytle Creek Wash, and is located somewhat south of the Glen Helen Regional Park and the Hyundai Pavilion.

Approximately 320 feet south of the Project site, there is a very large vehicle scrap yard. The vehicle scrap yard (named Grand Central), is a used auto parts and towing company. In addition, the Cargill grain storage/ processing plant is located approximately 0.33 mile south of the Project site. The BNSF and UP railroad tracks at the east and southeast of the proposed Project site are heavily trafficked and there are separate rail lanes that transverse in each direction.

The area immediately west (southwest) of the railroad tracks (and adjacent to the subject site) is the Cajon Creek Habitat Conservation Area. That site was once owned by the Vulcan Materials Company, and both mine reclamation and habitat restoration are in progress there.

9. Other agencies whose approval is required (e.g., permits, finance approval, or participation agreement): All responsible agencies, including the South Coast Air Quality Management District (SCAQMD), Regional Water Quality Control Board (RWQCB) and others must have the opportunity to review the Project prior to approval.

Source: Census 2000 Data, The CaSIL, MBA GIS (2010).

NORTH

5 2.5 0 5 Miles

Michael Brandman Associates

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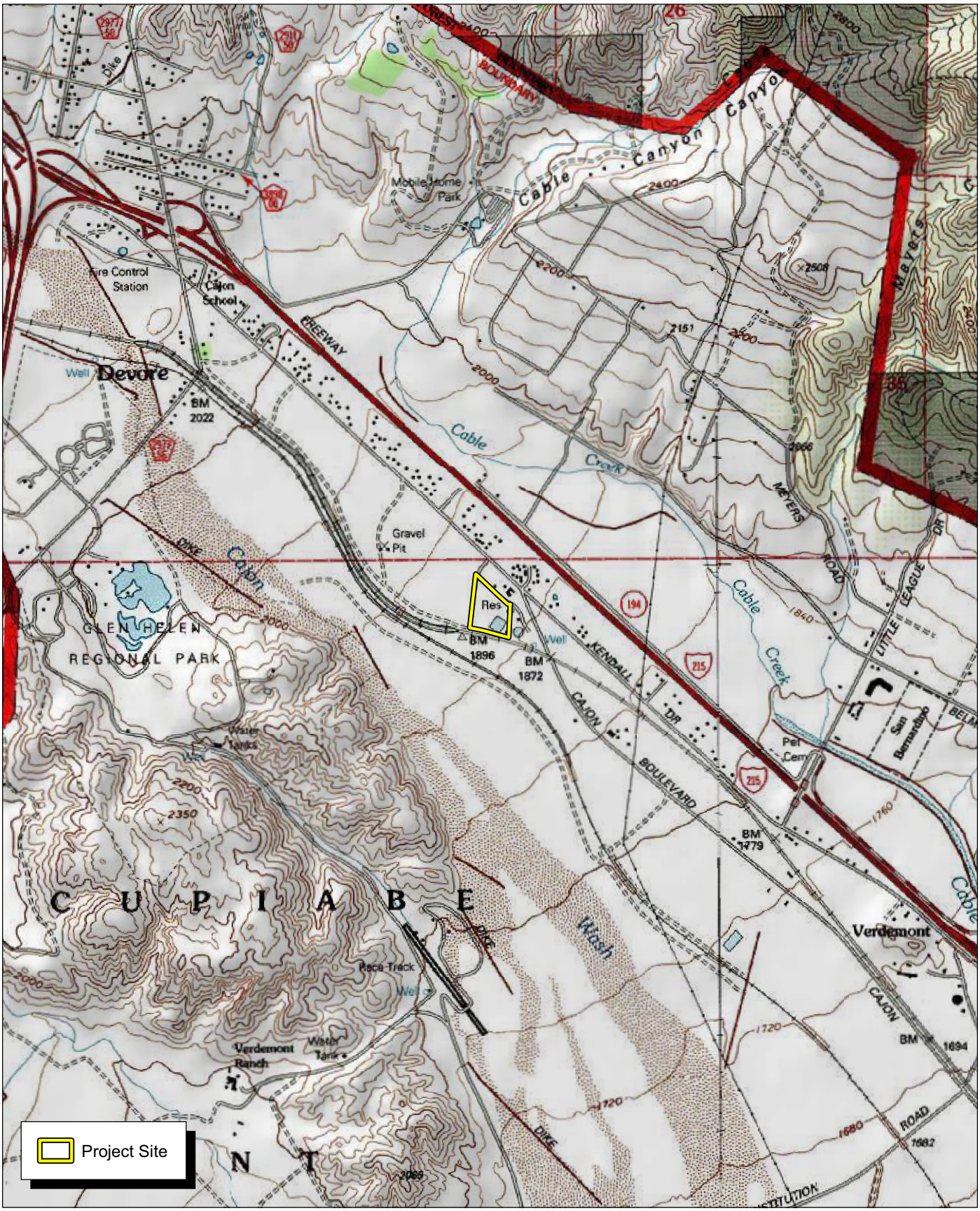
Exhibit 1
Regional Location Map

Cajon Ancillary Truck Trailer Storage Area Project
INITIAL STUDY & MITIGATED NEGATIVE DECLARATION



Source: TOPO! USGS San Bernardino North (1988) & Devore (1980) 7.5' DRGs.

Exhibit 2
Local Vicinity Map
Topographic Map

NORTH

2,000 1,000 0 2,000 Feet

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Cajon Ancillary Truck Trailer Storage Area Project
INITIAL STUDY & MITIGATED NEGATIVE DECLARATION

Source: NAIP for San Bernardino County (2009); ESRI (2008).

Exhibit 3
Local Vicinity Map
Aerial Map

NORTH

800 400 0 800 Feet

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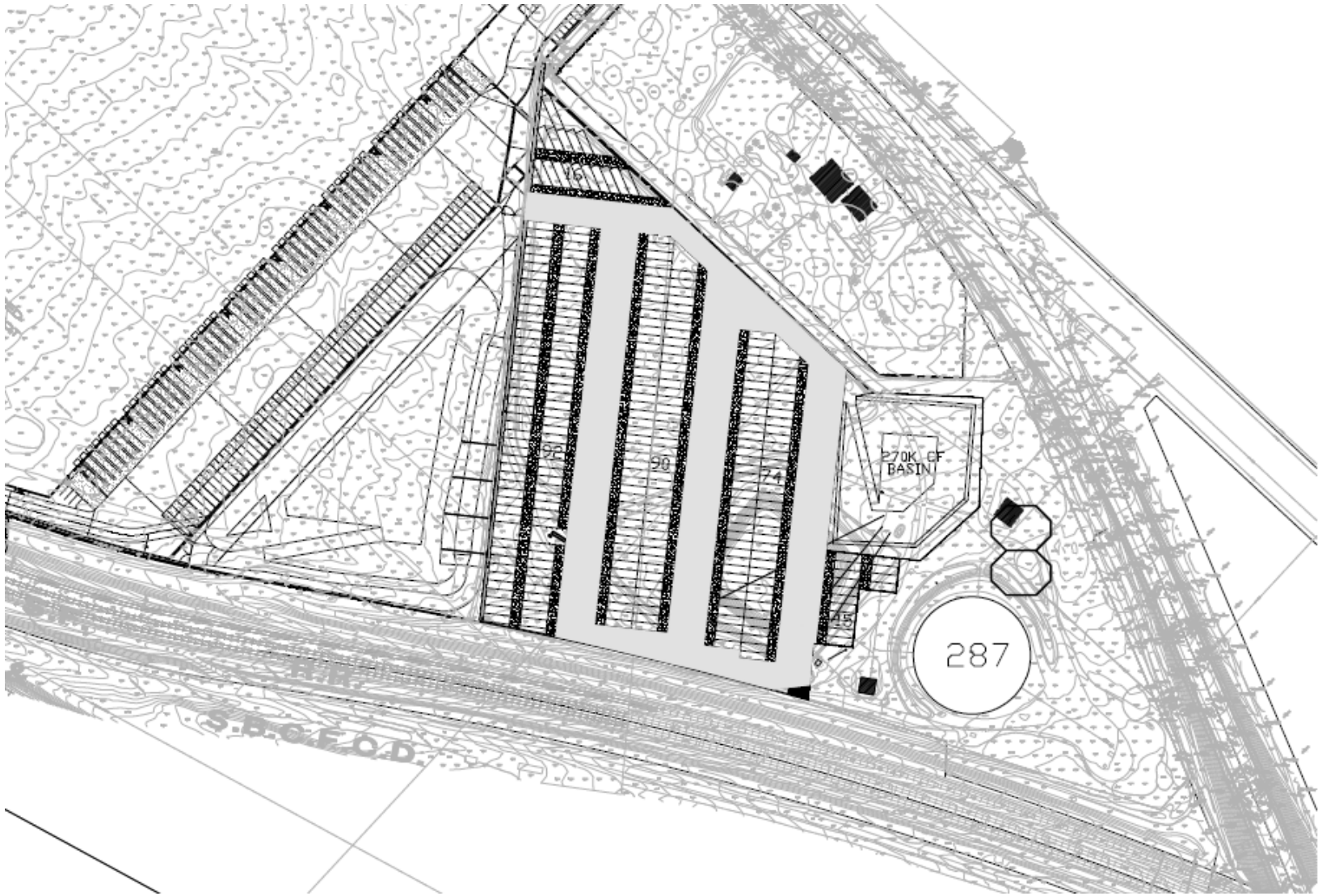
Cajon Ancillary Truck Trailer Storage Area Project
INITIAL STUDY & MITIGATED NEGATIVE DECLARATION



NORTH

Not to Scale

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Exhibit 4
Site Plan

Cajon Ancillary Truck Trailer Storage Area Project
INITIAL STUDY & MITIGATED NEGATIVE DECLARATION

CITY OF SAN BERNARDINO
DEVELOPMENT SERVICES
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.

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

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

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

T. Rahhal — 11-18-10
Signature — Date

Terri Rahhal — City Planner
Printed Name — Title

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

Discussion:

a) **Less Than Significant Impact:** The City of San Bernardino General Plan (2005) does not designate the Project area as being within a scenic vista corridor. The only resource of aesthetic value located within the Project area is the San Bernardino Mountains, which is located approximately two (2) miles north of the Project site. However, the Project does not propose to construct large structures that would have a substantial adverse effect of the scenic resource. Therefore, impacts in this regard would be less than significant.

b) **Less Than Significant Impact:** The existing visual character of the site consists of approximately 8.8-acres of vacant land isolated with roads, railroads, industrial and residential development on all sides. There are no designated Scenic Highways in the immediate vicinity of the Project site. In addition, there are no rock outcroppings, trees or historic buildings designated as a scenic resource located on or near the project site. Consequently, development of the Project would not damage the integrity of existing visual resources or historic buildings located within a State Scenic Highway. Further, the only resource of aesthetic value located within the Project area is the San Bernardino Mountains, which is located approximately two (2) miles north of the Project site. However, the Project

does not propose to construct large structures that would have a substantial adverse effect of the scenic resource. Therefore, the Project's impact to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway will be less than significant.

c) **Less Than Significant Impact:** The Project site is currently vacant land adjacent to two vacant industrial buildings. The ground surface in unpaved and vegetation consists of Riversidean Alluvial Fan Sage Scrub (RAFSS) (6.07 acres) and ruderal non-native.

The proposed Project will create short-term impacts due to specific phases in the construction process. Typical short-term impacts are in the form of isolated views of the site with heavy construction equipment and machinery preparing the land (i.e., grading), and eventually the construction of the trailer storage yard. Because this impact would be short-term and temporary, it is considered less than significant.

Some properties along Cajon Boulevard include equipment storage yards, and some of the properties store junk cars. The proposed Project will alter the existing visual character of the site; however, the project would be consistent with surrounding developed properties.

d) **Less than Significant Impact.** Although lighting would be limited to security lighting, the proposed Project would create a new source of light along the west side of Cajon Boulevard. Security lighting would be used during the night and early morning hours. Per the City of San Bernardino guidelines (see Section 19.20.030 of the City of San Bernardino Development Code); lights within the Project area will be directed downward to minimize impacts upon the dark night sky. In addition, lights will be designed and directed so that illumination does not spill over onto the lots of adjoining properties, into the eyes of motorists, or into the nearby plant and wildlife conservation areas located to the west and south of the site. The developers will comply with the City's development code requirements to minimize sky glow and reduce glare. With the implementation City Lighting Standards (19.20.030 of the Property Development Standards), the proposed project would have a less than significant impact related to new sources of light and glare.

e) **No Impact.** The Project would not impact other aesthetic resources within the Project site and area. Therefore, no additional impacts are anticipated in regards to aesthetic resources.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
II. AGRICULTURE RESOURCES:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to a non-agricultural use?	☐	☐	☐	☒
b) Other:	☐	☐	☐	☒

Discussion:

a) **No Impact.** According to the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP), the Project site is located in land designated as Other Land, which is categorized as "Land not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than forty acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land." Thus, there would be no impact to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance resulting from Project development.

b) **No Impact.** The Project is not within or near to any zoning for agricultural use, and is not under a Williamson Act contract. Thus, there would be no impact resulting from Project development.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
III. AIR QUALITY – Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan? (South Coast Air Basin)	☐	☐	☒	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation based on the thresholds in the SCAQMD's "CEQA Air Quality Handbook?"	☐	☐	☒	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e) Create objectionable odors affecting a substantial number of people based on the information contained in Project Description Form?	☐	☐	☒	☐
f) Other:	☐	☐	☒	☐

Discussion:

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. The entirety of the Project is located within the SCAQMD jurisdiction. Therefore, guidance and thresholds recommended by the SCAQMD are utilized in the analysis. For background information on pollutants, greenhouse gases, and regulatory information, please refer to the Air Quality and Greenhouse Gas Analysis Report for the CDC Trailer Storage Project, City of San Bernardino, California contained in Appendix A. The following is a summary of that report.

To assist Lead Agencies in the analysis of Project-related air impacts for CEQA assessments, the SCAQMD has adopted regional significance thresholds, localized significance thresholds, and health risk significance thresholds as described below. The SCAQMD recommends lead agencies apply these thresholds in determining the significance of a project's impacts on air quality. If Project emissions exceed the thresholds, then the Project would result in a significant air quality impact.

Regional Emission Significance Thresholds are designed to limit the impacts that emissions from a proposed project would have in affecting the ability of the South Coast Air Basin to attain or maintain air quality standards. Such emissions may affect the attainment of air quality standards many miles from a proposed project location. Regional emission thresholds are defined separately for construction and operational activities.

Localized Significance Thresholds were developed in response to the SCAQMD Governing Board's environmental justice initiatives (EJ initiative I-4) in recognition of the fact that criteria pollutants such as CO, NO_x, and PM_{10} and $PM_{2.5}$ in particular, can have local impacts as well as regional impacts. Local significance thresholds are defined separately for short-term construction activities and long-term operations and depend on the type of pollutant, geographical area where the project is located, and distance to the nearest sensitive receptors. In this regard, sensitive receptors are those individuals who are sensitive to air pollution and include children, the elderly, and persons with preexisting respiratory or cardiovascular illness. For purposes of CEQA, the SCAQMD considers a sensitive receptor to be a location where a sensitive individual could remain for 24 hours, such as residences, hospitals, or convalescent facilities. Commercial and industrial facilities are not included in the definition because employees do not typically remain onsite for 24 hours. However, when assessing the impact of pollutants with 1-hour or 8-hour standards (such as nitrogen dioxide and carbon monoxide), commercial and/or industrial facilities would be considered worker receptors for those purposes.

The closest sensitive receptor consists of a residence to the project is located approximately 175 feet north of the project site. Additional residences are located farther to the north and east across Kendall Drive.

Health risk significance thresholds are defined to protect the public from excessive levels of toxic air contaminants that can cause both long-term and short-term health impacts.

Table 3-1 and 3-2 identifies the SCAQMD significance thresholds applicable to the Project.

Table 3-1: SCAQMD Regional Thresholds

Pollutant	Construction (pounds per day)	Operation (pounds per day)
Oxides of Nitrogen (NO_x)	100	55
Reactive Organic Gases (VOC)	75	55
Particulate Matter (PM_{10})	150	150
Particulate Matter ($PM_{2.5}$)	55	55
Oxides of Sulfur (SO_x)	150	150
Carbon Monoxide (CO)	550	550
Source: South Coast Air Quality Management District, SCAQMD 2009c.		

Table 3-2: SCAQMD Localized Significance Thresholds
Localized Significance Thresholds - Construction

Pollutant	Daily Emission Rate (pounds per day)(1)	
Carbon Monoxide (CO)	2,978	
Nitrogen Dioxide (NO_2)	303	
PM_{10}	50	
$PM_{2.5}$	12	
Note: (1) Construction thresholds defined for a daily 5-acre grading area in Source Receptor Area #32 (Northwest San Bernardino Valley) and a receptor distance of 50 meters		
Localized Significance Thresholds - Operations		
Pollutant	**Averaging Time**	**Significance Threshold**
Nitrogen Dioxide (NO_2)	1-hour	100 $\mu g/m^3$
Carbon Monoxide (CO)	1-hour 8 hour	23,000 $\mu g/m^3$ 10,000 $\mu g/m^3$
PM_{10} PM_{10}	24-hours Annual	2.5 $\mu g/m^3$ 1.0 $\mu g/m^3$
$PM_{2.5}$	24-hours	2.5 $\mu g/m^3$
Source: SCAQMD 2009c and methodology described above.		

In addition to the thresholds established above for criteria pollutants, the SCAQMD has also defined health risk thresholds as follows (SCAQMD 2009c):

- Maximum Incremental Cancer Risk: 10 in 1 million at the nearest sensitive receptor or offsite worker; and

- Hazard Index (project increment) 1.0 or greater.

Cancer risk represents the probability (in terms of risk per million individuals) that an individual would contract cancer resulting from exposure to toxic air contaminants (TACs) continuously over a period of 70 years for sensitive receptors. Thus, an individual located in an area with a cancer risk of one would experience a one chance in one million of contracting cancer over a 70-year period assuming that individual lives in that area continuously for the entire 70-year time period for a sensitive receptor.

Would the Project:

a) **Less than Significant Impact:** According to the 1993 SCAQMD Handbook, there are two criteria to use to determine if a project would conflict with the Air Quality Management Plan (AQMP). A project is consistent with the AQMP if:

(1) The project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP (SCAQMD 1993, page 12-3).

(2) The project would not exceed the growth and population assumptions in the AQMP in 2010.

Criterion (1) - Project's Contribution to Air Quality Violations
The SCAQMD has established localized air quality significance thresholds (LSTs) in response to the SCAQMD Governing Board's EJ initiatives (EJ initiative I-4) in recognition of the fact that criteria pollutants such as CO, NO_x, and PM_{10} and $PM_{2.5}$ in particular, can have local impacts as well as regional impacts (SCAQMD 2009d). The LSTs have been defined separately for both construction and operations.

The evaluation of localized impacts determines the potential of the project to violate any air quality standard, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations. Localized impacts were computed from both the project's short-term construction emissions and the long-term operational emissions as discussed below. These impacts were then compared to the applicable SCAQMD LST concentration thresholds defined earlier in Table 2 to access the regulatory significance of these impacts

Local Construction Impacts

Based on information provided by the applicant, the construction would commence in January 2011 and last for a total of three months. The project area would be graded, infrastructure utilities installed, and a large portion of the project site paved with asphalt. Table 3-3 summarizes the estimated daily construction along with a comparison with the applicable SCAQMD' localized construction significance thresholds.

Table 3-3: Project Local Construction Impact Results

Construction Activity	Daily Emissions (pounds per day)[1]			
	NO_x	CO	PM_{10}[2]	$PM_{2.5}$[2]
Mass Grading / Fine Grading	31.6	18.0	26.2	6.7
Trenching	8.4	5.5	0.6	0.6
Asphalt Paving	14.2	8.2	1.2	1.1
Max emissions in 1 day	**31.6**	**18.0**	**26.2**	**6.7**
Localized Thresholds	303	2,978	50	12
Significant Impact?	No	No	No	No

Note:
[1] Construction emissions were derived for an area of 7.5 acres and were compared to the thresholds for a 5-acre area in Source Receptor Area 32 at a downwind distance of 50 meters; use of the 5 acre thresholds (the largest area contained in the SCAQMD threshold emission tables) for a 7.5 acre construction area provides a conservative evaluation of project significance since the thresholds for a 7.5 acre area would be larger than the thresholds for a 5 acre area.
[2] PM_{10} and $PM_{2.5}$ construction emissions assume compliance with SCAQMD Rule 403 governing the emissions of fugitive dust; fugitive dust emission controls assume watering of exposed surfaces and haul road twice per day, reducing speed on unpaved surfaces, and application of controls on equipment loading and unloading areas
Source: see Appendix A

As noted in Table 3-3, the construction of the project would not exceed any SCAQMD construction local significance thresholds. Therefore, construction of the project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

Local Operational Impacts

Local operational impacts would result from emissions released from the diesel trucks that would deliver and remove trailers from the storage yard. The truck emissions results while traveling within the storage area as well as during idling while either delivering or removing the trailers from the tractor trucks. The exact scheduling of truck movement into and out of

the storage area was not available for use in this assessment. Therefore, the following procedure was followed to provide a worst-case estimate of truck activities. The current site plan calls for the development of up to 300 parking spaces within the project area (the current estimate is 287 spaces). Emissions from the truck traffic into and out of the storage area were estimated for both an average condition and during a peak condition. The average condition assumed that a total of 300 trucks would move into and out of the storage yard on a uniform basis throughout the day (300 trucks per day or 13 trucks per hour). The peak condition assumed that 300 trucks would move into and out of the storage area over an 8-hour work shift (300 trucks per 8-hour period or 38 trucks per hour). The above assumptions amount to a complete turnover of the parking spaces within the storage area each day. Each truck was assumed to idle in the storage area for a total of 15 minutes as the trucks deliver or remove their trailer. Every truck was also assumed to be a heavy-heavy duty diesel truck.

Truck emissions were estimated from the ARB EMFAC2007 mobile source emission model assuming a vehicle speed of 10 miles per hour while traveling within the storage area and a vehicle fleet year of 2011. Table 3-4 provides the truck emission factors used in the assessment.

Table 3-4: Truck Emission Factors

Emission Factors[1]	NO_x	CO	PM_{10}[4]	$PM_{2.5}$[4]
Exhaust Emissions (g/mi)[2]	23.77	12.58	1.60	1.45
Idle Emissions (g/hr)[3]	111.96	47.52	1.61	1.48

Notes:
(1) All motor vehicle emission factors were derived from the EMFAC2007 model for the SCAQMD for the year 2011
(2) Exhaust emissions for the 4+ axle (HHD DSL) trucks assumed a travel speed of 10 mph; air temperature of 65° F and a relative humidity of 60 percent were assumed as representative of average weather conditions
(3) The idling emission factors for the 4+ axle assumed a speed of 0 mph
(4) The mobile source exhaust emission factors for PM_{10} and $PM_{2.5}$ include emissions from tire and brake wear.
Source: See Appendix A

The above truck emission assumptions were applied to an air dispersion model to estimate the resulting air quality impacts from the operation of the project. For this purpose, the United States Environmental Protection Agency (USEPA) SCREEN3 air dispersion model was used to provide the air quality impact estimates. The truck emissions were represented within the air dispersion model as an area source of the size equivalent to the size of the parking area. The project's air quality impacts were estimated at the nearest sensitive receptor, which is located approximately 53 meters north of the project site. The SCREEN3 air dispersion model provides estimates of the maximum 1-hour average impacts from an

emission source. To estimate air quality impacts for other time periods to compare to the 8-hour CO threshold, the 24-hour PM_{10} and $PM_{2.5}$ thresholds, and the annual PM_{10} thresholds, the 1-hour predicted impact was multiplied by a conversion factor of 0.7 to derive an 8-hour impact estimate, by a conversion factor of 0.4 to derive a 24-hour impact estimate, and by a conversion factor of 0.08 to derive an annual impact estimate (OEHHA 2003). The results of the air dispersion modeling analysis of the local operational impacts are provided in Table 3-5 along with a comparison to the applicable SCAQMD local significance thresholds.

Table 3-5: Localized Operational Impacts

Pollutant	Averaging Time	Localized Air Quality Impact[(1)] ($\mu g/m^3$)	Localized Significance Threshold ($\mu g/m^3$)	Total Impact Exceeds Threshold?
Carbon monoxide	1 hour	3,824	23,000	No
Carbon monoxide	8 hour	2,665	10,000	No
Nitrogen dioxide	1 hour[(2)]	143	180	No
PM_{10}	24 hour	0.4	2.5	No
PM_{10}	Annual	0.08	1.0	No
$PM_{2.5}$	24 hour	0.4	2.5	No

Notes:
$\mu g/m^3$ = micrograms per cubic meter (a concentration unit)
[(1)] Includes the following background air quality concentrations
CO 1-hour average: 3,795 $\mu g/m^3$
CO 8-hour average: 2,645 $\mu g/m^3$
NO_2 1-hour average: 137 $\mu g/m^3$
[(2)] NO_2 impacts from the project derived using the SCAQMD LST methodology for NO_2
Source: see Appendix A

As shown in Table 3-5, the operation of the project would not exceed any of the SCAQMD's operational localized significance thresholds.

Criterion (2) - Consistency with Growth Assumptions in the AQMD

An AQMP describes air pollution control strategies to be taken by a city, county, or region classified as a non-attainment area. The 2007 AQMP prepared by the SCAQMD is designed to satisfy the State Implementation Plan (SIP) submittal requirements of the federal Clean Air Act to demonstrate attainment of the new federal 8-hour ozone and $PM_{2.5}$ ambient air quality standards, the California Clean Air Act triennial update requirements, and fulfill the SCAQMD's commitment to update transportation emission budgets based on the latest approved motor vehicle emissions model and planning assumptions. CEQA requires that

certain proposed projects be analyzed for consistency with the AQMP. The AQMP uses the assumptions and projections of local planning agencies to determine control strategies for regional compliance. Since the AQMP is based in large part on local general plans, projects that are deemed consistent with the general plan are found to be consistent with the AQMP.

The project consists of the development of an overflow parking area to serve the needs of two adjacent warehouse buildings. The City of San Bernardino General Plan designates the proposed project area as "industrial" to accommodate business growth in the project vicinity. Since the project's intended land use is consistent with the current General Plan, implementation of the project would not require any amendments to the City's zoning designations for the project site. Therefore, the project would be within the City's General Plan designation and is consistent with the adopted SCAQMD AQMP.

b) **Less than Significant Impact:** In addressing this impact, use was made of the results from the localized significance impacts as discussed in Impact AIR-(a). If the project results in emissions that do not exceed those thresholds, it follows that those emissions would not cause or contribute to a local exceedance of the appropriate ambient air quality standard.

The localized construction and operational analysis uses thresholds that represent the maximum project emissions that would not cause or contribute to an exceedance of the most stringent applicable national or State ambient air quality standard. The localized construction and operational analysis demonstrated that the project would not exceed any of the localized significance thresholds defined by the SCAQMD for any pollutant. Therefore, the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation during construction or operation.

c) **Less than Significant Impact:** Section 15130(b) of the CEQA Guidelines states the following:

The following elements are necessary to an adequate discussion of significant cumulative impacts: 1) Either: (A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or (B) A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact.

In accordance with CEQA Guidelines 15130(b), this analysis of cumulative impacts is based on a summary of projections analysis. This analysis considers the current CEQA Guidelines, which includes the recent amendments approved by the Natural Resources Agency and effective on March 18, 2010. This analysis is based on the 2003 and 2007 AQMPs. The South Coast Air Basin is in nonattainment for ozone, particulate matter (PM_{10} and $PM_{2.5}$), and nitrogen dioxide, which means that concentrations of those pollutants currently exceed the ambient air quality standards for those pollutants. When concentrations of ozone, PM_{10}, $PM_{2.5}$, and NO_2 exceed the ambient air quality standards, then those sensitive to air pollution (i.e., children, elderly, sick) could experience health effects such as decrease of pulmonary function and localized lung edema in humans and animals, increased mortality risk, and risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans.

Under the amended CEQA Guidelines, cumulative impacts may be analyzed using other plans that evaluate relevant cumulative effects. The AQMPs describe and evaluate the future projected emissions sources in the South Coast Air Basin and sets forth a strategy to meet both state and federal Clear Air Act planning requirements and federal ambient air quality standards. Therefore, the AQMPs are relevant plans for a CEQA cumulative impacts analysis. The 2003 AQMP updates the attainment demonstration for the federal standards for ozone and PM_{10}; replaces the 1997 attainment demonstration for the federal CO standard and provides a basis for a maintenance plan for CO for the future; and updates the maintenance plan for the federal nitrogen dioxide standard that the South Coast Air Basin has met since 1992. The 2007 AQMP focuses on ozone and $PM_{2.5}$. The AQMP also incorporates significant new scientific data, emission inventories, ambient measurements, control strategies, and air quality modeling.

In accordance with CEQA Guidelines section 15064, subdivision (h)(3), a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program. Under the CEQA Guidelines Amendments, the lead agency should explain how implementing the particular requirements in the plan, regulation, or program ensure that the project's incremental contribution to the cumulative effect is not cumulatively considerable. To explain how implementing the requirements in the AQMPs ensures the project's incremental contribution to the cumulative effect is not cumulatively considerable,

the following three-pronged analysis was performed. To result in a less than significant impact, the following criteria must be true:

(1) Regional analysis: emissions of nonattainment pollutants below the SCAQMD regional significance thresholds.

(2) Plan approach: project consistency with current air quality attainment plans.

(3) Cumulative health impacts: less than significant cumulative health effects of the nonattainment pollutants.

As discussed under impacts a, b, and d of this section, the Project is consistent with Air Quality Attainment Plans and does not exceed any SCAQMD thresholds. Therefore, the project would not result in cumulative health impacts. Please see Appendix A for a more detailed discussion of this issue.

d) **Less than Significant Impact:** To address this impact, the following criteria are evaluated:

(1) Localized significance threshold analysis; and
(2) Health risks from toxic air contaminants.

Criterion (1): Localized Significance Threshold Analysis
The localized construction analysis uses thresholds that represent the maximum emissions for a project that would not cause or contribute to an exceedance of the most stringent applicable national or State ambient air quality standard (SCAQMD 2009d). If the project results in concentrations of air pollutants that under those thresholds, it follows that the project would not cause or contribute to an exceedance of the standard or expose sensitive receptors to substantial pollutant concentrations.

As identified in Impact AIR-(a), the localized analysis demonstrated that the project would not exceed the SCAQMD localized thresholds for CO, NO_2, PM_{10}, or $PM_{2.5}$ during either construction or operation. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations of CO, NO_2, PM_{10}, or $PM_{2.5}$.

Toxic Air Pollutants
The construction equipment would emit diesel particulate matter (DPM). DPM has been identified by the California Air Resource Board (ARB) as a carcinogenic substance.

However, the DPM emissions are short-term in nature. Determination of risk from DPM is considered over a 70-year exposure time. Because of the short duration of construction (3 months), exposures to the DPM from the construction equipment are less than significant.

During operation of the project, DPM would result from the travel of the diesel trucks within the storage yard as well as from the idling of the diesel trucks as the trucks pick-up or drop-off trailers while in the storage yard. SCAQMD Rule 1401 specifies health risk significance thresholds that are applicable to the project.

Cancer risks associated with the DPM from the truck operations within the storage area were quantified using truck use information and rates of diesel emissions from the ARB EMFAC2007 mobile source emission model. To provide a worst-case analysis, it was assumed that the storage area would handle 300 trucks per day, each day of the year. This amounts to 600 total truck trips per day, 300 truck trips into the storage area and 300 truck trips out of the storage area. Further, it was assumed that each truck would idle for 15 minutes within the storage area while picking-up or dropping-off a trailer.

Cancer risks were estimated using the USEPA SCREEN3 air dispersion model assuming that the DPM emissions were represented by an area source the size of the storage area. The SCREEN3 model provides estimates of the maximum 1-hour concentration of a pollutant at any downwind receptor. The estimation of cancer risk requires an estimate of the annual average pollutant concentration. To derive the annual average concentration, the maximum 1-hour average calculated by the SCREEN3 model was multiplied by a factor of 0.08 as recommended by the California Office of Environmental Health Hazard Assessment (OEHHA 2003). DPM emissions were averaged over a 70-year time period to correspond with the cancer risk exposure time period of 70 years. The estimated cancer risk at the nearest sensitive receptor located to the north of the storage area is 4.0 in one million. The risk level is less than the SCAQMD's cancer risk significance threshold of 10 in one million. Therefore, the DPM emissions from the operation of the project would not expose sensitive receptors to substantial levels of DPM.

e) **Less than Significant Impact:** Odors can cause a variety of responses. The impact of an odor results from interacting factors such as frequency (how often), intensity (strength), duration (in time), offensiveness (unpleasantness), location, and sensory perception.

Odor is typically a warning system that prevents animals and humans from consuming spoiled food or toxic materials. Odor-related symptoms reported in a number of studies

include nervousness, headache, sleeplessness, fatigue, dizziness, nausea, loss of appetite, stomach ache, sinus congestion, eye irritation, nose irritation, runny nose, sore throat, cough, and asthma exacerbation (SCAQMD 2007a).

Land uses typically considered associated with odors include wastewater treatment facilities, waste-disposal facilities, or agricultural operations. The project does not contain land uses typically associated with emitting objectionable odors.

Diesel exhaust and volatile organic compounds (VOCs) would be emitted during construction of the project, which are objectionable to some; however, emissions would disperse rapidly from the project site and therefore should not reach an objectionable level at the nearest sensitive receptors.

f) **Less than Significant Impact.** This analysis is restricted to greenhouse gases identified by AB 32, which include carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. The project would generate a variety of greenhouse gases during construction and operation, including several defined by AB 32 such as carbon dioxide, methane, and nitrous oxide. It should be noted that carbon dioxide typically comprises over 95 percent of the total greenhouse gas total.

The project may also emit greenhouse gases that are not defined by AB 32. For example, the project may generate aerosols. Aerosols are short-lived particles, as they remain in the atmosphere for about one week. Black carbon is a component of aerosol. Studies have indicated that black carbon has a high global warming potential; however, the Intergovernmental Panel on Climate Change states that it has a low level of scientific certainty (IPCC 2007a). Water vapor could be emitted from evaporated water used for landscaping, but this is not a significant impact because water vapor concentrations in the upper atmosphere are primarily due to climate feedbacks rather than emissions from project-related activities. The project would emit nitrogen oxides and volatile organic compounds, which are ozone precursors. Ozone is a greenhouse gas; however, unlike the other greenhouse gases, ozone in the troposphere is relatively short-lived and can be reduced in the troposphere on a daily basis. Stratospheric ozone can be reduced through reactions with other pollutants.

Certain greenhouse gases defined by AB 32 would not be emitted by the project. Perfluorocarbons, hydrofluorocarbons, and sulfur hexafluoride are typically used in industrial

applications, none of which would be used by the project. Therefore, it is not anticipated that the project would emit hydrofluorocarbons, perfluorocarbons or sulfur hexafluoride.

The City of San Bernardino has not defined a significance threshold for greenhouse gases applicable to projects developed within the City. The SCAQMD, has, however, established a greenhouse gas significance threshold of 10,000 MTCO2e/year for industrial projects for which it is the lead agency (SCAQMD 2009e). In the absence of a threshold established by the City, the SCAQMD's industrial greenhouse gas significance threshold was applied to assess the significance of the project's greenhouse gas emissions.

Greenhouse gas emissions were estimated from the construction and operation of the project including onsite and offsite mobile sources. The mobile source emissions were estimated from emission factors provided by the ARB EMFAC2007 mobile source emission model.

The estimated greenhouse gas emissions from the construction of the project are shown in Table 3-6. Note that virtually all of the estimated greenhouse gases consist of carbon monoxide.

Table 3-6: Project Construction Greenhouse Gas Emissions

Construction Activity	Annual Greenhouse Gas Emissions ($MTCO_2e$/year)[1]
Mass Grading / Fine Grading	50
Trenching	5
Asphalt Paving	15
Total Annual Emissions	**70**

Note:
[1] The greenhouse gas emissions are converted to metric tons of carbon equivalents ($MTCO_2e$) using the formula:
$MTCO_2e$ = (tons of gas) x (global warming potential) x (0.9072 metric tons of gas)
Source: See Appendix A

An inventory of greenhouse gas emissions generated by the operation of the project is presented in Table 3-7.

Table 3-7: Project Operational Greenhouse Gases

Source	Emissions ($MTCO_2e$ per year)[1]
Onsite truck emissions	494

Note:
[1] $MTCO_2e$ = metric tons of carbon dioxide equivalents (includes carbon dioxide, methane, nitrous oxide, and/or hydrofluorocarbons).
Source: See spreadsheets in Appendix A, Greenhouse Gas Emission Spreadsheets and URBEMIS 2007 Model Output.

The total greenhouse gas emissions attributable to both construction and operation are determined by amortizing the construction emissions over a 30-year time period and adding the resulting level to the annual operational emissions. Thus, the total annual greenhouse emissions from both the construction and operation of the project are shown in Table 3-8 along with the SCAQMD greenhouse gas significance threshold for industrial projects, which was adopted for use in this study.

Table 3-8: Project Total Greenhouse Gas Emissions.

Source	Emissions ($MTCO_2e$ per year)
Construction (amortized over 30 years)	2
Onsite truck emissions	494
Total	496
SCAQMD Greenhouse Gas Significance Threshold	10,000
Exceeds Threshold?	No

$MTCO_2e$ = metric tons of carbon dioxide equivalents (includes carbon dioxide, methane, nitrous oxide, and/or hydrofluorocarbons).
Source: See spreadsheets in Appendix A

As noted from the results shown in Table 3-8, the greenhouse gas emissions from the construction and operation of the project are substantially less than the SCAQMD's significance threshold of 10,000 MTCO2e per year.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game (CDFG) or US Fish and Wildlife Service (USFWS)?	☐	☐	☒	☐
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 CDFG or USFWS?	☐	☐	☒	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (CWA) (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e) Conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state HCP?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Continued				
f) Other:	☐	☐	☒	☐

Discussion:

a) **Less Than Significant Impact:** Based on a Habitat Assessment conducted by Michael Brandman Associates (MBA) in September 2010 (See Appendix B), the Project site contains suitable habitat for San Bernardino Kangaroo Rat (*Dipodomys merriami parvus*) (SBKR), a federally endangered species. Protocol surveys were conducted to determine the presence or absence of SBKR (See Appendix C). The surveys and trappings concluded that dulzura kangaroo rats, which are not endangered, were the most trapped species, totaling 58 animals; however, no SBKRs were trapped during the five-night survey effort. Three additional small mammal species were also trapped and included San Diego pocket mouse (*Chaetodipus fallax*), which is a California Species of Special Concern, deer mouse (*Peromyscus maniculatus*), and desert wood rat (*Neotoma lepida*); however, impacts to these species will be less than significant.

In addition, the Project site also contains suitable nesting habitat for various non-sensitive avian species. However, as a Project mitigation measure (see mitigation measure BR-1 located within Impact Analysis 4d), removal of vegetation will be conducted outside the breeding season and will eliminate any impacts to nesting birds. Therefore, impacts in this regard will be less than significant.

b) **Less Than Significant Impact:** Based on the Habitat Assessment conducted by MBA (See Appendix B), during site reconnaissance of the Project site, no riparian/riverine habitats were observed onsite. In addition, no vernal pools, vernal pool habitat was observed on the Project site. Therefore, impacts in this regard will be less than significant.

c) **Less Than Significant Impact:** Based on the Habitat Assessment conducted by MBA (See Appendix B), during site reconnaissance of the Project site, no wetlands were observed onsite. Consequently, the Project would not affect any off-site wetlands as defined by Section 404 of the Clean Water Act (CWA). Therefore, impacts in this regard will be less than significant.

d) **Less Than Significant Impact with Mitigation:** According to the Biological Assessment conducted by MBA, the Project site contains suitable habitat for various non-sensitive nesting birds that have certain protection under the North America Migratory Bird Treaty Act (MBTA). However, mitigation BR-1, below, will require the removal of vegetation to be conducted outside the breeding season, which will reduce impacts to nesting birds to a level of less than significant.

Mitigation:

MM BR-1 Removal of any trees, shrubs, grass or any other potential nesting habitat, should be conducted outside the nesting season. If tree removal is to occur during the nesting season (February-August), a breeding bird survey conducted by a qualified biologist would be conducted within seven days of construction activities to identify any potential nests. If birds are found to be nesting inside or within 250 feet of the impact area, construction would need to be postponed until it is determined that no active nests are present or a buffer area around the nest of 250 feet (500 feet for raptors) would need to be maintained. A qualified biologist would monitor any nests until it is determined that the nest is no longer active, at which time construction could continue.

e) **Less Than Significant Impact:** According to the City of San Bernardino's General Plan, the Project site is within a Biological Resource Area (see General Plan Figure NRC-2). The General Plan provides Policies for land uses located within a Biological Resource Management area (BRM). The following Policies apply to the Project:

Policy 12.1.3: Require that all proposed land uses in the "Biological Resource Management Area" (BRM), Figure NRC-2, be subject to review by the Environmental Review Committee (ERC).

Policy 12.1.4: Require that development in the BRM:

a. Submit a report prepared by a qualified professional(s) that addresses the proposed project's impact on sensitive species and habitat, especially those that are identified in State and Federal conservation programs;
b. Identify mitigation measures necessary to eliminate significant adverse impacts to sensitive biological resources;

c. Define a program for monitoring, evaluating the effectiveness of, and ensuring the adequacy of the specified mitigation measures; and
d. Discuss restoration of significant habitats.

As discussed under Impact 4d, the Project conducted a Habitat Assessment and protocol surveys by a qualified Biologist (See Appendix B and C of this IS MND). The Habitat Assessment was conducted to addresses the proposed project's impact on sensitive species and habitat and concluded that development and operation of the Project has the potential to impact SBKR. Protocol surveys were conducted to determine the presence or absence of SBKR within the Project site. The results of the surveys and trappings returned negative results. Therefore, impacts in this regard will be less than significant.

The Project site also contains suitable nesting habitat for various non-sensitive avian species. However, as a Project mitigation measure (see mitigation measure BR-1 located within Impact Analysis 4d), removal of vegetation will be conducted outside the breeding season and will eliminate any impacts to nesting birds. Therefore, the Project is consistent with Policy 12.1.3 and Policy 12.1.4 of the City of San Bernardino General Plan and will not conflict with any of the adopted local, regional or State habitat conservation plan and impacts will be less than significant.

f) **Less Than Significant Impact:** The City of San Bernardino currently contains landscaping standards (see City of San Bernardino Municipal Code 19.28.090) regarding the removal or destruction of trees within landscaped areas. Municipal Code 19.28.090 states that removal of healthy, shade providing, aesthetically valuable trees shall be discouraged. In the event that more than five (5) trees are to be cut down, uprooted, destroyed or removed within a 36-month period, a permit shall first be issued by the Department of Parks, Recreation and Community Services. The proposed Project will not involve the removal or destruction of five (5) or more trees within a 36-month period from the Project site. Therefore, impacts would be less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Be developed in a sensitive archaeological area as identified in the City's General Plan?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of CEQA?	☐	☐	☒	☐
c) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5 of CEQA?	☐	☐	☒	☐
d) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐
e) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐
f) Other:	☐	☐	☐	☒

Discussion:

a) **Less Than Significant Impact.** As outlined within Figure 4.4-2 of the City of San Bernardino Draft Environmental Impact Report (EIR) for the General Plan (2005), the proposed Project is not located within an area of concern for archaeological resources. Therefore, the Project will not have a significant impact on sensitive archaeological area as identified in the City's General Plan.

b) **Less Than Significant Impact.** As outlined within Figure 4.4-2 of the City of San Bernardino Draft EIR for the General Plan (2005), the proposed Project is not located within an area of concern for archaeological resources. Therefore, the Project will not have a significant impact on an archaeological resource pursuant to §15064.5 of CEQA.

c) **Less Than Significant Impact.** There are no known historical resources within the Project boundaries and is not located in an area identified as an area of concern within the General Plan. Therefore, the Project will not have a significant impact on a historical resource as defined in §15064.5 of CEQA.

d) **Less Than Significant Impact.** According to the City's General Plan, there are no known paleontological resources within the project boundaries.

e) **Less Than Significant Impact.** There are no known human remains within the project site. However, in the unlikely event that human remains are unearthed during construction, State law [California Health and Safety Code 7050.5 and CEQA Section 15604(e)] requires that the County Coroner be contacted within 24 hours of the discovery. No further disturbance would occur in the vicinity of the find until the coroner has made the necessary findings as to the origin and disposition pursuant to the California PRC 5097.98.

f) **No Impact.** There are no known cultural resources within the project boundaries. Therefore, no impacts to cultural resources are anticipated.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
VI. GEOLOGY AND SOILS – Would the project:				
a) Involve earth movement (cut and/or fill) based on information included in the Project Description Form?	☐	☐	☒	☐
b) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death?	☐	☐	☒	☐
c) Be located within an Alquist-Priolo Earthquake Fault Zone?	☐	☐	☒	☐
d) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
e) Be located within an area subject to landslides, mudslides, subsidence, or other similar hazards as identified in the City's General Plan?	☐	☐	☒	☐
f) Be located within an area subject to liquefaction as identified in the City's General Plan?	☐	☐	☒	☐
g) Modify any unique physical feature based on a site survey/evaluation?	☐	☐	☒	☐
h) Result in erosion, dust, or unstable soil conditions from excavation, grading, fill, or other construction activities?	☐	☐	☒	☐
i) Other:	☐	☐	☐	☒

Discussion:

a) **Less Than Significant Impact.** Development of the proposed Project site will not require cut and/or fill. Consequenlty, grading activities on the Project site will not require the importing or transporting of soils. Therefore, impacts in this regard will be less than significant.

b) **Less Than Significant Impact:** The proposed Project is located in a seismically active area, as is all of Southern California. Future earthquakes could generate various levels of seismic

ground shaking onsite, and could potentially damage and/or destroy proposed development. The potential severity of ground shaking depends on many factors, including distance from the originating fault, the earthquake magnitude, and the nature of the earth materials below the Project site.

Improvements to the Project site will consist of an asphalt-paved drive path leading from the adjacent CDC to a series of rows of trailer parking stalls as well as concrete aprons running parallel with the drive paths that provide a solid surface for placement of trailer landing gear. The balance of the site will be maintained as a gravel-base, permeable-surface lot. No buildings are proposed as part of the Project. Therefore, impacts would be less than significant.

c) **Less Than Significant Impact:** The proposed project is about 0.9 mile from the closest edge of the Alquist-Priolo Study Zone for the San Andreas Fault, and about 0.6 mile from the closest edge of the Alquist-Priolo Study Zone for the San Jacinto/Glen Helen Fault Zone. Therefore, the proposed Project is not within an Alquist-Priolo Special Study Zone. Furthermore, no habitable structures will be built in association with the proposed Project that will result in a risk of loss, injury, or death occurrence involving rupture of an earthquake fault. Impacts would be less than significant.

d) **Less Than Significant Impact:** Grading within the Project area may create soil erosion and/or loss of topsoil. During the course of construction, high winds may generate dust during operation of machinery on-site, which may cause a potential impact to soil erosion. Additionally, Figure S-8 of the City of San Bernardino General Plan shows that the Project site is designated a high wind area. However, the proposed Project will be developed in compliance with a Storm Water Pollution Prevention Plan (SWPPP) and the National Pollution Discharge Elimination System (NPDES) permit. Therefore, impacts will be less than significant upon consistency with SWPPP and NPDES.

e) **Less Than Significant Impact:** Figure S-7 of the City of San Bernardino General Plan shows areas subject to slope instability and major landslides. However, the Project site is not located within an area with high susceptibility to landslides. Furthermore, the Project site is not within an area of potential ground subsidence as per Figure S-6 of the City's General Plan. Therefore, impacts in this regard will be less than significant.

The Project site is located within an area of high liquefaction susceptibility; however, the Project will not construct habitable structures. In addition, development in the

San Bernardino planning area is required to adhere to the building standards of the most recent California Building Code (CBC) and Uniform Building Code (UBC), which regulates the design and construction of excavations, foundations, retaining walls, and other design elements to mitigate the effects of seismic shaking and adverse soil conditions.

Expansive soils are defined as soils that shrink when dry and swell when wet. The City of San Bernardino General Plan states that soil types found within the City of San Bernardino are not characterized as expansive. Further, the proposed Project will not involve the development of habitable structures and will adhere to the building standards of the most recent CBC and UBC. Therefore, consistency with the CBC and UBC will avoid significant impacts.

f) **Less Than Significant Impact:** The proposed Project site is adjacent to the Cajon Wash and in an area with relatively high water table. Figure S-5 in the City of San Bernardino General Plan outlines areas susceptible to liquefaction. The Project site is shown within an area as having a higher than normal susceptibility to liquefaction (H). However, the Project would not include the development habitable structures. In addition, development of the Project will be consistent with Section 19.24.060 of the City's Municipal Code. Therefore, impacts would be less than significant.

g) **Less Than Significant Impact.** Development of the proposed Project site will not modify any unique physical feature. Consequenlty, impacts to a unique physical feature during grading activities will be less than significant.

h) **Less Than Significant Impact:** As previously stated, grading within the Project area may create soil erosion and/or loss of topsoil. During the course of construction, high winds may generate dust during operation of machinery on-site, which may cause a potential impact to soil erosion. Additionally, Figure S-8 of the City of San Bernardino General Plan shows that the Project site is designated a high wind area. However, the proposed Project will be developed in compliance with a SWPPP and the NPDES permit. Therefore, impacts will be less than significant upon consistency with SWPPP and NPDES.

i) **No Impact.** No additional impacts are anticipated in regards to geology and soils.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
VII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
VII. HAZARDS AND HAZARDOUS MATERIALS – Continued				
h) Other:	☐	☐	☒	☐

Discussion:

a) **Less Than Significant Impact:**

Short-Term Impacts

Construction Activities

Construction activities associated with the proposed school would use a limited amount of hazardous materials. Construction vehicles onsite may require routine or emergency maintenance that could result in minor releases of oil, diesel fuel, transmission fluid, or other materials. Relevant construction materials may include asphalt, tar, paints, coatings and solvent. These would be used on a limited basis, both in terms of volume and duration by professionals trained in their appropriate use. The potential for the release of these materials is considered low and, even if a release were to occur, it would not result in a significant hazard to the public, surrounding uses, or the environment due to the small quantities of these materials associated with construction vehicles.

Long-Term Impacts

Hazards and Hazardous Materials

A limited amount of pollutants are expected from the Project site. These pollutants consist of heavy metals, organic compounds, trash and debris, oil, and grease. The treatment controls Best Management Practices (BMPs) that will be incorporated into this Project, with medium/high effectiveness to reduce the pollutants of concern, are detention/infiltration basin and a permeable parking lot. Proper storage and proper training of maintenance employees will avoid the potential for significant impacts to a less than significant level.

b) **Less Than Significant Impact.** Potential long-term impacts from the operation of the Project, which are also discussed under Impact HHM-1, would not create significant adverse impacts regarding the likely release of hazardous materials nor create a significant hazard to the public or the environment. Therefore, the Project will have a less than significant impact related hazards due to the possible release of hazardous materials.

c) **Less Than Significant Impact.** The City's Development Code, fire department regulations, and the State's occupational safety codes regulate the use, storage, and transport of hazardous materials within the City. Industrial uses are required to register with the local fire department and have appropriate material safety data sheets (MSDS) onsite so that workers and emergency responders will be aware of what chemicals and/or hazardous materials are located at a particular site. With continued implementation of city, county, and state regulations regarding hazardous materials, significant impacts would be less than significant.

The proposed Project is not within one-quarter mile of an existing or proposed school. The nearest school is Chavez Middle School on Magnolia Avenue located approximately 1.10 miles from the proposed Project site.

d) **Less Than Significant Impact.** The project is not located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, impacts from hazardous site under Government Code Section 65962.5 would be less than significant.

e) **No Impact.** Rialto Municipal Airport is located approximately 5.30 miles southwest of the Project site. Due to the distance to the airport, the Project site is not located within the Rialto Municipal Airport Land Use Plan and no impacts are anticipated to occur. The Project site is not located within the vicinity of a private airstrip. Therefore, no impacts are anticipated to occur because of the Project.

f) **Less Than Significant Impact.** Chapter 10 Safety of the City of San Bernardino General Plan under section Emergency Preparedness and Response states that the City has an Emergency Management Plan and Emergency Evacuation Routes. The Project will not physically interfere with an adopted emergency response plan or evacuation plan and would have less than significant impacts.

g) **Less Than Significant Impact:** Per the City of San Bernardino General Plan, the Project site is not located within a fire hazard area. In addition, no habitable structures will be developed as a result of Project implementation. Therefore, the proposed Project would not have a significant risk of loss, injury or death involving wildland fires.

h) **Less Than Significant Impact:** No additional impacts in regards to hazards and hazardous materials are anticipated. Therefore, impacts in this regard will be less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
VIII. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, such as from areas of material storage, vehicle or equipment maintenance (including washing or detailing), waste handling, hazardous materials handling or storage, delivery areas, loading docks, or other outdoor areas?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
VIII. HYDROLOGY AND WATER QUALITY – Continued				
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒
k) Other:	☐	☐	☐	☒

Discussion:

a) **Less Than Significant Impact:**

Short-Term Construction Impact

The Project could result in short-term construction related impacts to surface water quality. Grading and construction within the site will remove existing vegetation and disturb on-site soils, increasing the potential for erosion and off-site transport of sediment in stormwater runoff. The use of heavy equipment, machinery, and other materials during construction could result in adverse water quality impacts if spills encounter stormwater, and polluted runoff enters downstream receiving waters.

This Project is subject to the Statewide NPDES permit for construction related activities from the State Water Resources Control Board (SWRCB). Consequently, the Project will be required to develop and implement a SWPPP, which will demonstrate compliance with the

State NPDES permit, and provide protection of water quality during construction and operation. The Project will submit the SWPPP to the Santa Ana RWQCB along with the required Notice of Intent prior to commencement of grading activities. The imposition of BMP's through the SWPPP ensure that federal and State water quality standards will not be violated and are considered less than significant without mitigation.

Long-Term Operational Impacts

Once developed, on-site storm water flows will come into contact with developed surfaces that may contain pollutants. A limited amount of pollutants are expected from the Project site. These pollutants consist of heavy metals, organic compounds, trash and debris, oil, and grease. Impacts to water quality can be minimized by employing BMP's, emphasizing good storage practices, which keep potential pollutant sources separated from stormwater.

In addition, a WQMP has been prepared for the Project and is located within Appendix D of this IS/MND. The WQMP incorporates Project specific requirements that may include, but are not limited to, guidance, operation and maintenance for all source control, site design, and treatment control BMP's. In addition, operation and maintenance of the Project may be required to include maximizing canopy interception and water conservation, landscape planning, efficient irrigation, storm drain system signage, trash storage areas and litter control, employee training/education program, protect slopes and channels, common area catch basin inspection, pervious concrete/alternative materials, and storm filter filtration systems. The WQMP also provides a thorough description of operation and maintenance activities and a schedule of the frequency of operation and maintenance for each BMP.

The inclusion of the aforementioned measures within the Project's WQMP and BMP's will treat future storm water runoff to levels of water quality deemed acceptable by the Santa Ana RWQCB. Less than significant impacts to water quality will result.

b) **No Impact.** The proposed Project is not anticipated to interfere with or alter groundwater levels. Therefore, Project impacts with regard to groundwater depletion and supply would have no impact.

c) **Less Than Significant Impact:** The proposed improvements will marginally alter the drainage pattern of the Project site by changing the currently vacant site into paved areas, parking and driveways. However, treatment control BMPs will be incorporated into the Project, with medium/high effectiveness to reduce the pollutants of concern. Treatment

control BMPs will include detention/infiltration basin and a permeable parking lot. As required by the WQMP, Project runoff rates, volumes, velocities, and flow duration for the post development condition will not exceed those of the pre-development condition for 1-year, 2-year and 5-year frequency storm events. This condition will be substantiated with hydrologic modeling methods that are acceptable to the Agency, to the U.S. Army Corps of Engineers (USACOE), and to local watershed authorities. No existing natural drainage systems currently occur onsite. Site runoff will be directed to the detention/infiltration basin that is sized according to the volume based on the WQMP objectives (See Appendix D for the Project's WQMP). Therefore, Project impacts with regard to altering existing drainage patterns would be considered less than significant.

d) **Less Than Significant Impact:** The Project will alter on-site drainage; however, as discussed in Impact 8. c), the proposed improvements will marginally alter the drainage pattern of the Project site by changing the currently vacant site into paved areas, parking and driveways. However, treatment control BMPs will be incorporated into the Project, with medium/high effectiveness to reduce the pollutants of concern. Treatment control BMPs will include detention/infiltration basin and a permeable parking lot. As required by the WQMP, Project runoff rates, volumes, velocities, and flow duration for the post development condition will not exceed those of the pre-development condition for 1-year, 2-year and 5-year frequency storm events. This condition will be substantiated with hydrologic modeling methods that are acceptable to the Agency, to the USACOE, and to local watershed authorities. No existing natural drainage systems currently occur onsite. Site runoff will be directed to the detention/infiltration basin that is sized according to the volume based on the WQMP objectives. Consequently, the design of the Project will adequately convey stormwater, preventing flooding, erosion and siltation. There are no streams or rivers located on the Project site that would be affected. Therefore, impacts to a stream or river will be less than significant.

e) **Less Than Significant Impact:** The proposed Project will utilize much of the storm drain infrastructure present in the area. However, as discussed in Impact 8. c), the proposed improvements will marginally alter the drainage pattern of the Project site by changing the currently vacant site into paved areas, parking and driveways. However, treatment control BMPs will be incorporated into the Project, with medium/high effectiveness to reduce the pollutants of concern. Treatment control BMPs will include detention/infiltration basin and a permeable parking lot. As required by the WQMP, Project runoff rates, volumes, velocities, and flow duration for the post development condition will not exceed those of the

pre-development condition for 1-year, 2-year and 5-year frequency storm events. This condition will be substantiated with hydrologic modeling methods that are acceptable to the Agency, to the USACOE, and to local watershed authorities. No existing natural drainage systems currently occur onsite. Site runoff will be directed to the detention/infiltration basin that is sized according to the volume based on the WQMP objectives. Thus, implementation of the Project will not create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts in this regard will be less than significant.

f) **Less Than Significant Impact:** As described in Section VIII (a), the City will develop and implement a SWPPP, which will demonstrate compliance with the State NPDES permit, and provide protection of water quality during construction of the Project. The imposition of BMP's ensure that federal and State water quality standards will not be violated.

g) **No Impact.** The Project does not include the construction of housing within the 100-year flood hazard area. Therefore, no impacts will occur as a result of the Project.

h) **No Impact:** The Project is not located within a 100-year flood hazard area and would not place structures in such a way that they would impede or redirect flood flows (City of San Bernardino General Plan, 2005). Therefore, the Project will not have a significant impact in regards to placing structures within a 100-year flood hazard area, which would impede or redirect flood flows.

i) **No Impact:** The proposed Project is east if the Cajon Creek Wash but is separated by a berm, a railroad track, and a large conservation and mining reclamation area. Figure S-2, Seven Oaks Dan Inundation, of the City's General Plan shows the limit of the flooded area in San Bernardino if that dam were to fail. The Project site is approximately nine miles northwest of the closest portion of the potential inundation area, thus no people or structures would be exposed to loss as a result of such failure.

j) **No Impact:** The proposed Project site is not located near a large body of water. Therefore, the potential of impacts from inundation by seiche, tsunami, or mudflow activity will be less than significant.

k). **No Impact:** Implementation of the proposed Project is not anticipated to create additional impacts in regards to hydrology and water quality.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
IX. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☒	☐
d) Be developed within the Hillside Management Overlay District?	☐	☐	☒	☐
e) Be developed within Foothill Fire Zones A, B, or C as identified in the City's General Plan?	☐	☐	☒	☐
f) Be developed within the Airport Influence Area as adopted by the San Bernardino International Airport Authority?	☐	☐	☒	☐
g) Other:	☐	☐	☐	☒

Discussion:

a) **Less Than Significant Impact:** Implementation of the Project will not displace or physically divide an established community. All construction activities proposed in association with this Project would occur on vacant land. In addition, the Project site will not limit access nor otherwise divide the existing individual residence located northeast of the Project site. Therefore, implementation of the Project would have a less than significant impact on physically dividing an established community.

b) **Less Than Significant Impact:** According to the City of San Bernardino General Plan (2005), the Project site is located within an area designated and Zoned as Light Industrial,

which allows for the installation of truck trailer parking lot and is consistent with the proposed land use. Therefore, impacts would be less than significant.

c) **Less Than Significant Impact:** The Project is shown within the Cajon Conservation Bank (Cal Mat) on Figure NRC-1 of the City of San Bernardino's General Plan. The Cajon Conservation Bank consists of 1,378-acre conservation site and mitigation land bank within the RAFSS habitat. The conservation bank is located north of the Devil Creek Diversion Channel, south of I-215, in the Cajon wash running parallel to and near Cajon Boulevard. The Cajon Creek Conservation Bank was established to conserve populations of 24 species associated with alluvial fan scrub habitat, including the Santa Ana River woollystar, SBKR, and coastal California gnatcatcher. As discussed within Impact Analysis 4. a), protocol surveys were conducted at the Project site to determine the presence or absence of SBKR. The results of the surveys and trappings returned negative results. In addition, there is no approved HCP or NCCPs that apply to the Project site. Therefore, the Project will not conflict with any of the adopted local, regional or State HCP.

d) **Less Than Significant Impact:** According to the City's General Plan Figure S-7, the Project site does not occur within an area identified as having slope stability concerns or the potential for major landslides. Consequenlty, development of the site is not restricted by the City's Hillside Overlay District which limits development densities based on slopes. Therefore, impacts in this regard will be less than significant.

e) **Less Than Significant Impact:** According to the City's General Plan Figure S-9, the Project site is not located within Foothill Fire Zones A, B, or C. Consequenlty, impacts in this regard will be less than significant.

f) **Less Than Significant Impact:** The Rialto Municipal Airport is located approximately 5.30 miles southwest of the Project site. Due to the distance to the airport, the Project site is not located within the Rialto Municipal Airport Land Use Plan and no impacts are anticipated to occur. The Project site is not located within the vicinity of a private airstrip. Therefore, no impacts are anticipated to occur to the Airport Influence Area as adopted by the San Bernardino International Airport Authority.

g) **No Impact:** No additional impacts to land use are anticipated upon development of the Project.

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

Discussion:

a) **Less Than Significant Impact:** See Impact Analysis 10. b) for the Project's impacts to mineral resources. As concluded within Impact 10. b), mineral extraction at the Project site is not feasible and impacts in this regard will be less than significant.

b) **Less Than Significant Impact:** According to Figure NRC-3 of the City of San Bernardino General Plan, the Project site is within an area with significant mineral deposits or an area with a likelihood of significant mineral deposits (MRZ-2). Although the Project area is designated as being within an area with significant mineral deposit, the adjacent properties are developed for non-mineral extraction uses. Furthermore, the Project site is zoned for Industrial Light (IL) uses including warehousing/distribution, assembly, light manufacturing, research and development, mini storage, and repair facilities conducted within enclosed structures as well as supporting retail and personal uses. The site is not within an Industrial Extractive (IE) zone used for mineral, sand, and gravel extraction with an approved Mineral Reclamation Plan in accordance with the California Surface Mining and Reclamation Act. Therefore, mineral extraction at the Project site could potentially affect the health and safety of nearby sensitive receptors (including the adjacent residential use) and would not be consistent with the General Plan's designated Land Use and Zoning for the Project site.

Therefore, mineral extraction at the Project site is not feasible and impacts in this regard will be less than significant.

c) **Less Than Significant Impact:** As previously stated, according to Figure NRC-3 of the City of San Bernardino General Plan, the Project site is within Mineral Resource Zone 2, which is an area with significant mineral deposits or an area with a likelihood of significant mineral deposits. However, the site is not within an Industrial Extractive (IE) zone used for mineral, sand, and gravel extraction. In addition, mineral extraction at the Project site could potentially affect the health and safety of nearby sensitive receptors (including the adjacent residential use) and would not be consistent with the General Plan's designated Land Use and Zoning for the Project site. See Impact Analysis X (b) for additional information in this regard. Therefore, mineral extraction at the Project site is not feasible and impacts in this regard will be less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XI. NOISE – Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the City's General Plan or Development Code, or applicable standards of other agencies?	☐	☐	☒	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundbourne noise levels?	☐	☐	☒	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐
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?	☐	☐	☒	☐
f) Other:	☐	☐	☒	☐

Discussion:

a) **Less Than Significant Impact:**

Short-Term Noise Levels

Construction noise represents a short-term increase in ambient noise levels. Noise impacts from construction activities associated with the Project would be a function of the noise generated by construction equipment, equipment location, the sensitivity of nearby land uses, and the timing and duration of the construction activities. However, according to Section 8.54.070 of the City San Bernardino Municipal Code (Disturbances from Construction Activity) construction, erection, alteration, repair, addition, movement, demolition, or improvement to any building or structure, which are authorized by a valid city permit, shall be allowed between the hours of 7:00 a.m. and 8:00 p.m. The Project will conduct hours of

construction, grading and demolition in accordance with the requirements of the City's Noise Ordinance. Therefore, impacts in this regard will be less than significant.

Long-Term Noise Levels

The City of San Bernardino General Plan prohibits the development of new or the expansion of existing industrial, commercial, or other uses that generate noise impacts on housing, schools, health care facilities or other sensitive uses above 65 decibels (dBA).

Operation of the Project will not produce additional vehicle trips and will therefore not increase traffic noise levels on or off the Project site. The Project proposes to transfer trailers directly between the Project site and CDC facility. Therefore, noise generated from the transfer of trailers may potentially impact the existing residential use, located approximately 163 feet northeast of the Project. However, according to the City of San Bernardino Municipal Code, Section 8.54.060 B (Exemptions), such noises are an accompaniment (i.e. something that accompanies or is served or used with something else) of the Project and are therefore exempt. According to Municipal Code, Section 8.54.060 B, noises that are an accompaniment and effect of a lawful business, commercial or industrial enterprise carried on in an area zoned for that purpose are exempt, except where there is evidence that such noise is a nuisance and that such a nuisance is a result of the employment of unnecessary and injurious methods of operation.

Currently, extensive freight rail service is located directly adjacent to the Project site by the BNSF and UP railroads. According to the City of San Bernardino General Plan, the freight operators are the largest users of San Bernardino's rail facilities. Rail service provided by UP on its main line through San Bernardino is expected to grow significantly in the future due to the increased international trade at the Ports of Long Beach and Los Angeles, the San Bernardino International Airport, as well as population growth in southern California. Currently there are 24 trains per day on a peak day passing through San Bernardino on the main lines. By 2025, this forecast is to increase to 132 trains per day (San Bernardino General Plan).

Federal safety requirements establish the parameters for the sounding of locomotive horns at highway-rail grade crossings. These requirements were established by the Federal Railroad Administration (FRA) and took effect on June 24, 2005. They set a minimum noise level of 96 dB and a maximum of 110 dB at a distance of 100 feet to provide sufficient warning to motorists and pedestrians. In order to provided sufficient time for persons that may be

crossing the tracks to respond to the warning horn, engineers are required to start sounding the horn at least 15 seconds but no more than 20 seconds in advance of all grade crossings.

The nearest railroad crossing to the Project site is located approximately one mile north of the Project site at Glen Helen Parkway. Consequently, due to the railroad crossing's distance to the Project site, noise from the warning horn may be potentially high for the Project site and area. In addition, the noise generated by a train pass-by can generate excessive noise from the engine and cars. As outlined within the City of San Bernardino General Plan Final EIR (2005), the distance in feet to a 65 dBA Ldn Contour from the adjacent railroad lines is 1,135 feet with a horn or 829 feet without a horn. The Project site is located approximately 54 feet from the Railroad lines. In addition, the residence located northeast of the Project site is located approximately 719 feet from the railroad lines. Therefore, the Project area as well as the adjacent residence already experience elevated noise levels from the adjacent rail uses and is likely to experience increased noise levels in the future due to the forecast of 132 trains per day.

In addition, due to the close proximity to Cajon Boulevard, the proposed Project site (approximately 271 feet) and the residence located northeast of the Project site (approximately 56 feet) already experiences increased noise levels from nearby traffic. Therefore, operation of the project will not exceed the already existing noise generated by the adjacent rail uses and roadways and will therefore have a less than significant impact in regards to the exposure of persons to or generation of noise levels in excess of standards established in any applicable plan or noise ordinance, or applicable standards of other agencies.

b) **Less Than Significant Impact:**

Construction Vibration

Construction activities can produce vibration that may be felt by the adjacent residential use. The construction of the Project would not require the use of equipment such as pile drivers, which are known to generate substantial construction vibration levels. The primary sources of vibration during construction would be from bulldozers, backhoes, crawler tractors, and scrapers. Construction impacts were assessed using the continuous/frequent intermittent structural damage vibration threshold of 0.5 peak particle velocity PPV for construction. A vibratory roller would produce the greatest amount of vibration on the Project site, with a (PPV) of 0.210 inches per second at 25 feet, well below the 0.5 PPV standard. The nearest

existing sensitive receptors to the Project site is the residences located approximately 163 feet northeast of the Project site, which yields only an estimated 0.03 PPV for a vibratory roller, which is well under the 0.5 PPV threshold. Therefore, construction-related vibration impacts from the Project on existing sensitive receptors would be less than significant.

Operation Vibration

Operation of the Project will not result in any excessive groundborne noise levels or groundborne vibration. In addition, there are no such vibration or groundborne sources associated with the proposed Project.

c) **Less Than Significant Impact:** Operation of the Project will not produce additional vehicle trips and will therefore not increase traffic noise levels on or off the Project site. The Project proposes to transfer trailers directly between the Project site and CDC facility. Therefore, noise generated from the transfer of trailers may potentially impact the existing residential use, located approximately 163 feet northeast of the Project. However, according to the City of San Bernardino Municipal Code, Section 8.54.060 B (Exemptions), such noises are an accompaniment of the Project and are therefore exempt. According to Municipal Code, Section 8.54.060 B, noises that are an accompaniment and effect of a lawful business, commercial or industrial enterprise carried on in an area zoned for that purpose are exempt, except where there is evidence that such noise is a nuisance and that such a nuisance is a result of the employment of unnecessary and injurious methods of operation.

Currently, extensive freight rail service is located directly adjacent to the Project site by the BNSF and UP railroads. According to the City of San Bernardino General Plan, the freight operators are the largest users of San Bernardino's rail facilities. Rail service provided by UP on its main line through San Bernardino is expected to grow significantly in the future due to the increased international trade at the Ports of Long Beach and Los Angeles, the San Bernardino International Airport, as well as population growth in southern California. Currently there are 24 trains per day on a peak day passing through San Bernardino on the main lines. By 2025, this is forecast to increase to 132 trains per day (San Bernardino General Plan).

Federal safety requirements establish the parameters for the sounding of locomotive horns at highway-rail grade crossings. These requirements were established by the Federal Railroad Administration (FRA) and took effect on June 24, 2005. They set a minimum noise level of 96 dB and a maximum of 110 dB at a distance of 100 feet to provide sufficient warning to

motorists and pedestrians. In order to provided sufficient time for persons that may be crossing the tracks to respond to the warning horn, engineers are required to start sounding the horn at least 15 seconds but no more than 20 seconds in advance of all grade crossings.

The nearest railroad crossing to the Project site is located approximately one mile north of the Project site at Glen Helen Parkway. Consequently, due to the railroad crossing's distance to the Project site, noise from the warning horn may be potentially high for the Project site and area. In addition, the noise generated by a train pass-by can generate excessive noise from the engine and cars. As outlined within the City of San Bernardino General Plan Final EIR (2005), the distance in feet to a 65 dBA Ldn Contour from the adjacent railroad lines is 1,135 feet with a horn or 829 feet without a horn. The Project site is located approximately 54 feet from the Railroad lines. In addition, the residence located northeast of the Project site is located approximately 719 feet from the railroad lines. Therefore, the Project area as well as the adjacent residence already experience elevated noise levels from the adjacent rail uses and is likely to experience increased noise levels in the future due to the forecast of 132 trains per day.

In addition, due to the close proximity to Cajon Boulevard, the proposed Project site (approximately 271 feet) and the residence located northeast of the Project site (approximately 56 feet) already experiences increased noise levels from nearby traffic. Therefore, operation of the project will not exceed the already existing noise generated by the adjacent rail uses and roadways and will therefore have a less than significant impact in regards to a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.

d) **Less Than Significant Impact With Mitigation:** Construction noise represents a short-term increase in ambient noise levels. Noise impacts from construction activities associated with the Project would be a function of the noise generated by construction equipment, equipment location, the sensitivity of nearby land uses, and the timing and duration of the construction activities.

Short-term noise impacts could occur during construction activities either from the noise impacts created from the transport of workers and movement of construction materials to and from the Project site, or from the noise generated onsite during ground clearing, excavation, grading, and construction activities. Table 11-1, below, lists typical construction equipment noise levels for equipment that would be used during construction of the Project.

Construction activities are carried out in discrete steps, each of which has a unique mix of equipment and, consequently, unique noise characteristics. These sequential phases would change the character of the noise levels surrounding the construction site as work progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow noise ranges to be categorized by work phase.

Table 11-1: Noise Associated with Typical Construction Equipment

Construction Phases	Maximum Noise Levels Measured (dBA at 50 feet)
Grading	89
Backhoe	90
Pneumatic tools	88
Air compressor	86
Crane	83
Plate compactor	89
Concrete vibrator	85
Trucks	87
Source: Federal Transit Agency, 1995.	

On the basis of their proximity to the Project site, the residential use located to the northeast of the Project site is the sensitive receptor of most concern as it relates to Project construction noise. Noise levels at the residential use represents the highest potential construction noise levels, and any receptors further from the Project site would experience noise levels that are less than those predicted here.

Based on the closest residence located approximately 163 feet to the northeast of the Project site, and based on operation of a backhoe which is the noisiest equipment listed in Table 11-1, above, the maximum noise level would be 27.3 dBA. Note that construction noise often varies significantly on a day-to-day basis, and the noise levels shown in the table represent a worst-case scenario. For example, operation of a backhoe near sensitive receptors is likely to occur during a relatively short period during the grading phase of the Project. Noise levels based on construction noise at 27.3 dBA measured at 163 feet from Project site; assume a 6-dB reduction for each doubling of distance. Noise level depicts peak levels and does not predict the 24-hour weighted average (CNEL).

Construction noise would occur during clearing, grading and construction, but would be the most noticeable during the initial period of intensive grading. In addition, the noise created would be of limited and variable duration and would occur only during the construction phase of the Project. Consequently, the noise generated from construction may at times represent a substantial temporary increase over existing noise levels.

In order to minimize disruption to existing residents, all construction activity would be performed during hours specified by the City of San Bernardino Municipal Code Noise requirements; which are between the hours of 7:00 a.m. and 8:00 p.m. Implementation of Mitigation Measure N-1 will also reduce construction noise levels to less than significant.

Mitigation Measures

N-1 Prior to commencement of grading, the Project proponent shall prepare a construction noise plan that provides the following:

- All construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers.
- During construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers, to the extent feasible.
- During construction, stockpiling and vehicle staging areas shall be located as far as practical from noise sensitive receptors during construction activities. This provision shall also be coordinated with staging and stockpiling requirements contained in the Projects SWPPP.

e) **Less Than Significant Impact:** There are no airport land use plans in the area, nor is the Project within two miles of an airport. The airport closest to the Project is the Rialto Municipal Airport (Miro Field), which is approximately five (5) miles south of the Project site. Therefore, impacts to an airport land use plan will be less than significant.

f) **Less Than Significant Impact:** There are no private airstrips in the project vicinity. Therefore, impacts to a private airstrip will be less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XII. POPULATION AND HOUSING – Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Remove existing housing and displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐
c) Other:	☐	☐	☒	☐

Discussion:

a) **Less Than Significant Impact:** Development of the proposed Project will create a convenient trailer storage location for the existing business adjacent to the Project. Consequently, the Project would not create additional jobs, nor will the Project have a direct or indirect increase in population growth within the Project area. Therefore, impacts to substantial population growth in an area will be less than significant.

b) **Less Than Significant Impact:** The proposed Project site is currently vacant. The Project would not require the removal of any existing housing. Therefore, impacts to population or housing would be less than significant.

c) **Less Than Significant Impact:** As discussed in Impact 12 (b), implementation of the Project would not displace any existing houses or people. The residential structure to the north of the Project site is not within the development plans of the proposed trailer storage parking; therefore, it would not be affected by development of the Project. Impacts would be less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XIII. PUBLIC SERVICES				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	☐	☐	☒	☐
Fire protection, including medical aid?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☐	☒
Parks or other recreational facilities?	☐	☐	☐	☒
Other governmental services?	☐	☐	☐	☒
b) Other:	☐	☐	☐	☒

Discussion:

a) **Fire Protection, including medical aid?**

Less Than Significant Impact: The City Fire Department has mutual joint response agreements with the cities of Loma Linda, Colton, Rialto, and Central Valley Fire District (Station #75, in Muscoy), and the U.S. Forest Service.

In addition to local joint response, all the fire departments in the State are signatory to a master mutual aid agreement. This agreement was established to provide assistance for major incidents. The agreement states in part that political subdivisions will reasonably exhaust local resources before calling for outside assistance.

There are several fire stations within close proximity of the Project site. The first is in the unincorporated Verdemont neighborhood located on Cajon Boulevard about 1.50 miles northwest of the Project site. The second is in the Devore neighborhood and is located about 1.72 miles north of the Project site. The closest of the City of San Bernardino Fire Stations is

located at 6065 Palm Avenue about 1.80 miles southeast. The implementation of the truck trailer storage parking lot will not create a risk for structure or wildland fires.

Further, the Project will be subject to all applicable development impact fees, ensuring that development in the Project area bares a proportionate share of the cost of capital facilities necessary to accommodate such development in order to effectively provide the quality and extent of infrastructure required. Therefore, the proposed project will not result in any impact to fire services/protection, response times, fire protection personnel needs, and/or create any need for fire protections facilities. Therefore, impacts associated with this issue will be less than significant.

Police Protection?
Less than Significant Impact. The City of San Bernardino Police Department provides police protection services for the proposed Project area. Since the proposed Project will not add any residences or businesses, police service ratios will not be affected. Additionally, the Project will be subject to all applicable development impact fees, ensuring that development in the Project area bares a proportionate share of the cost of capital facilities necessary to accommodate such development in order to effectively provide the quality and extent of infrastructure required. Therefore, Project impacts with regard to police protection services would be considered less than significant.

Schools?
No Impact. No residential units are proposed as part of the Project, and the Project would not contribute to additional development in the area. No new demand on schools would be generated by the proposed Project. The Project will not generate school-age children. Therefore, no impacts associated with schools will occur.

Parks?
No Impact. Since the proposed Project is associated with the development of an ancillary trailer storage parking area, the development will not add population to the City of San Bernardino and will therefore not negatively affect existing park usage. Therefore, there would be no impacts as a result of Project development.

b) **No Impact.** No other public facilities are foreseen that would be impacted by the proposed Project. Therefore, there would be no impact as a result of Project development.

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

Discussion:

a) **No Impact:** The proposed Project would not increase the use of existing neighborhood or regional parks. Therefore, there would be no impacts as a result of a Project development.

b) **No Impact:** The proposed Project will not include recreational facilities nor require the construction or expansion of recreational facilities. Therefore, there would be no impacts as a result of Project development.

c) **No Impact:** The proposed Project is not anticipated to impact other recreational resources within the Project area. Therefore, there would be no impact as a result of a Project development.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XV. TRANSPORTATION/TRAFFIC – Would the project:				
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	☐	☐	☒	☐
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?	☐	☐	☒	☐
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e) Result in inadequate emergency access?	☐	☐	☒	☐
f) Result in inadequate parking capacity?	☐	☐	☒	☐
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	☐	☐	☒	☐
h) Other:	☐	☐	☐	☒

Discussion:

a) **Less Than Significant Impact:** Operation of the Project will not produce additional vehicle trips on or off the Project site. The only traffic produced at the site will be the transfer of trailers directly between the Project site and CDC facility, which will be limited to onsite use. Ultimately, implementation of the Project will provide an additional 300 truck trailer spaces

for an existing use (i.e. the CDC facility) and will in fact benefit the current capacity and traffic flows within the Project site. Traffic impacts generated by the Project will be minimal and will therefore not cause a substantial increase in traffic in relation to the existing traffic load or capacity of the street system.

b) **Less Than Significant Impact:** Operation of the Project will not produce additional vehicle trips and will therefore not increase level of service on or off the Project site. The only traffic produced at the site will be the transfer of trailers directly between the Project site and CDC facility, which will be limited to onsite use. Ultimately, implementation of the Project will provide an additional 300 truck trailer spaces for an existing use (i.e. the CDC facility) and will in fact benefit the current capacity and traffic flows within the Project site. LOS impacts generated by the Project will therefore be minimal and will not exceed, either individually or cumulatively, a level of service standard established by the City or County Congestion Management Agency.

c) **Less Than Significant Impact:** The project will not affect or be affected by air traffic and, therefore, there is no additional or increased safety risks to air travel.

d) **Less Than Significant Impact:** The Project will not substantially increase hazards due to the design feature (e.g., sharp curves or dangerous intersections) because the existing roadway network is on a grid with streets meeting at right angles. Therefore, impacts in this case will be less than significant.

e) **Less Than Significant Impact:** The Project proposes to provide ingress and egress points within the northeast portion of the Project site, allowing easy access to the Project site. In addition, the Project will have direct access to the CDC facility and will only allow for the emerging and storage of truck trailers onsite. Therefore, the proposed ingress and egress point within the northeast portion of the Project site is sufficient to allow emergency access to the Project site and impacts will be less than significant.

f) **Less Than Significant Impact:** The Project will provide an adequate number of parking spaces, consistent with City of San Bernardino design requirements and standards. No permanent structures are proposed as part of the Project. The intent of the Project is to serve the overflow of the CDC's already existing 695 commercial trailer parking spaces. The parking provided at the existing CDC's is built to City Code and implementation of the Project will provide an additional 300 parking spaces to serve as overflow and truck storage for the CDC facility. Therefore, impacts to parking will be less than significant.

g) **Less Than Significant Impact:** The Project does not conflict with policies, plans, or programs supporting alternative transportation. The City of San Bernardino provides various transportation programs to its resident. Currently, Omnitrans provides a bus stop located at Palm Avenue and Kendall Drive (Route 7), which is approximately 1.8 miles southeast of the Project site. Consequently, there are forms of alternative transportation available near the Project site. Implementation of the Project will not affect the transportation programs available near the Project site. Therefore, the Project will not conflict with alternative transportation and impacts are less than significant.

h) **No Impact:** The proposed Project is not anticipated to create other transportation nor traffic related issues within the Project area. Therefore, there would be no impact as a result of a Project development.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XVI. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Exceed wastewater treatment requirements of the Santa Ana Regional Water Quality Control Board?	☐	☐	☒	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects?	☐	☐	☒	☐
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?	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☒
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?	☐	☐	☒	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐
h) Other:	☐	☐	☐	☒

Discussion:

a) **Less than Significant Impact.** The proposed Project does not propose the installation of public restrooms. Therefore, Project impacts in exceeding wastewater treatment requirements would be less than significant.

b) **Less than Significant Impact.** Implementation of the proposed Project will generate a minimal amount of wastewater at the Project site. However, a WQMP has been prepared for the Project and is located within Appendix D of this IS MND. The WQMP incorporates Project specific requirements that may include, but are not limited to, guidance, operation and maintenance for all source control, site design, and treatment control BMP's. In addition, operation and maintenance of the Project may be required to include maximizing canopy interception and water conservation, landscape planning, efficient irrigation, storm drain system signage, trash storage areas and litter control, employee training/education program, protect slopes and channels, common area catch basin inspection, pervious concrete/alternative materials, and storm filter filtration systems. The WQMP also provides a thorough description of operation and maintenance activities and a schedule of the frequency of operation and maintenance for each BMP.

   The inclusion of the aforementioned measures within the Project's WQMP and BMP's, will treat wastewater and water quality deemed acceptable by the Santa Ana RWQCB. Less than significant impacts to water quality will result.

c) **Less Than Significant Impact:** The proposed Project will utilize much of the storm drain infrastructure present in the area. However, additional storm drains will be implemented in the existing right of way of the project. These improvements would be minor in scale and the effects resulting from the improvements will be less than significant. Additional improvements within the Project site will consist of a gravel-base, located underneath the rows of trailer parking stalls, providing a permeable-surface. Thus, implementation of the Project will not require or result in the construction of new storm water drainage facilities or expansion of existing facilities. Impacts in this regard will be less than significant.

d) **No Impact.** The proposed Project consists of the development of an ancillary trailer storage parking lot, which once completed will have little to no water use requirements. Therefore, the Project would have no impact on sufficient and available water supplies.

e) **Less than Significant Impact.** The proposed Project would not exceed the wastewater treatment provider's ability to adequately provide service to the Project. Therefore, impacts would be a less than significant.

f) **Less Than Significant Impact.** The proposed Project consists of the development of an ancillary trailer storage parking lot. Due to the nature of the Project, it is anticipated that no solid waste disposal services would be required. Therefore, no impacts related to this issue would occur.

g) **Less Than Significant Impact:** The Project would be required to comply with all federal, State, and local statutes and regulations related to solid waste. Moreover, the Project does not propose land uses that would generate substantial quantities of hazardous waste for disposal or any other specialized activities that would affect compliance with applicable federal, State or local regulations related to solid waste. Therefore, impacts in this regard will be less than significant.

h) **No Impact:** The proposed Project is not anticipated impact utilities and service systems within the Project area. Therefore, there would be no impact as a result of a Project development.

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

Discussion:

a) **Less Than Significant Impact With Mitigation:** Based on a Habitat Assessment conducted by MBA in September 2010 (See Appendix B), the Project site contains suitable habitat for SBKR, a federally endangered species. Protocol surveys were conducted to determine the presence or absence of SBKR (See Appendix C). The surveys and trappings concluded that dulzura kangaroo rats were the most trapped species, totaling 58 animals; however, no SBKR were trapped during the five-night survey effort. Three additional small mammal species were also trapped and included San Diego pocket mouse (*Chaetodipus fallax*), which is a California Species of Special Concern, deer mouse (*Peromyscus maniculatus*), and desert wood rat (*Neotoma lepida*); however, these species were concluded not to be significantly impacted upon development of the Project.

In addition, during site reconnaissance of the Project site, no riparian/riverine habitats, vernal pools, vernal pool habitat were observed onsite. The site does not lie within any known wildlife corridors. However, the Project site does contains a suitable nesting habitat for various avian species. As a Project mitigation measure (see mitigation measure BR-1 located within Impact Analysis 4d), removal of vegetation will be conducted outside the breeding season and will eliminate any impacts to nesting birds. Therefore, impacts in this regard will be less than significant.

b) **Less Than Significant Impact:** Implementation of the Project will not produce cumulative impacts due to proposed use of the Project (i.e. overflow truck parking for an existing use). Consequently, do to the nature of the Project (i.e. overflow parking lot for the CDC facility) the level of cumulative impact would be less than significant.

c) **Less Than Significant Impact:** The Project would not cause substantial adverse impacts to humans either directly or indirectly. Construction noise would occur during clearing, grading and construction, but would be the most noticeable during the initial period of intensive grading. In addition, the noise created would be of limited and variable duration and would occur only during the construction phase of the Project. Consequently, the noise generated from construction may at times represent a substantial temporary increase over existing noise levels.

In order to minimize disruption to existing residents, all construction activity would be performed during hours specified by the City of San Bernardino Municipal Code Noise requirements; which are between the hours of 7:00 a.m. and 8:00 p.m. In addition, implementation of Mitigation Measure N-1 will also reduce construction noise levels to less than significant. Therefore, impacts in this regard will be less than significant.

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