PUBLIC REVIEW DRAFT

Initial Study/Mitigated Negative Declaration

Willow and Valley Warehouses Project

FEBRUARY 2026

Prepared for:

CITY OF RIALTO
Community Development Department
150 S. Palm Avenue
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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
ADT	average daily traffic
AQMP	Air Quality Management Plan
BACT	Best Achievable Control Technology
bgs	below ground surface
BMP	Best Management Practice
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CDPH	California Department of Public Health
CEQA	California Environmental Quality Act
CFG	California Fish and Game
CHRIS	California Historical Resources Information System
City	City of Rialto
CNDDB	California Natural Diversity Database
CNG	compressed natural gas
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
CRHR	California Register of Historical Resources
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
EIR	environmental impact report
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gas
GWP	global warming potential
I	Interstate
IS	Initial Study
kBtu	kilo-British thermal unit
kWh	kilowatt-hour
LACM	Natural History Museum of Los Angeles County
L_{max}	maximum sound level recorded during the measurement interval
LOS	level of service
LST	localized significance threshold
MBTA	Migratory Bird Treaty Act
MM	Mitigation Measure

Acronym/Abbreviation	Definition
MND	Mitigated Negative Declaration
MS4	Municipal Separate Storm Sewer System
MT	metric ton
NAAQS	National Ambient Air Quality Standards
NO_2	nitrogen dioxide
NO_x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWI	National Wetland Inventory
O_3	ozone
OEHHA	Office of Environmental Health Hazard Assessment
OPR	Office of Planning and Research
PA	production-attraction
PM_{10}	coarse particulate matter
$PM_{2.5}$	fine particulate matter
PPV	peak particle velocity
PRC	Public Resources Code
project	Willow and Valley Warehouses Project
RFD	Rialto Fire Department
ROW	right-of-way
RPD	Rialto Police Department
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SBCTA	San Bernardino County Transportation Authority
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SCS	Sustainable Communities Strategy
SR	State Route
SRA	source receptor area
SSC	Species of Special Concern
SWPPP	Stormwater Pollution Prevention Plan
TAC	toxic air contaminant
TCR	tribal cultural resource
TIA	transportation impact analysis
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service
USGS	U.S. Geological Survey
VMT	vehicle miles traveled
VOC	volatile organic compound

1 Introduction

1.1 Project Overview

The City of Rialto (City) received an application from Investment Building Group (project applicant) requesting the following approvals for development of the Willow and Valley Warehouses Project (project) located at the northeast corner of South Willow Avenue and West Valley Boulevard in Rialto, California:

- Conditional Development Permit
- Tentative Parcel Map
- Precise Plan of Design
- Master Case
- General Plan Amendment
- Specific Plan Amendment

The project includes demolition of an existing office building and construction of two industrial/warehouse buildings equaling approximately 119,700- square feet on an approximately 6.02-acre (gross) property located in the central part of the City. The project site is composed of three parcels (Assessor's Parcel Numbers 0132-182-08, 0132-182-09, and 0132-202-04). In addition to the industrial/warehouse buildings, the project would include landscaping, passenger vehicle parking spaces, trailer parking spaces, and tractor-trailer loading docks.

1.2 California Environmental Quality Act Compliance

The City is the lead California Environmental Quality Act (CEQA) agency responsible for the review and approval of the proposed project. Based on the findings of the Initial Study (IS), the City has made the determination that a Mitigated Negative Declaration (MND) is the appropriate environmental document to be prepared in compliance with CEQA (California Public Resources Code, Section 21000 et seq.). As stated in CEQA Section 21064, an MND may be prepared for a project subject to CEQA when an IS has identified no potentially significant effects on the environment.

This draft Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared by the City as lead agency and is in conformance with Section 15070(a) of the CEQA Guidelines (14 CCR 15000 et seq.). The purpose of the MND and the IS Checklist is to determine any potentially significant impacts associated with the proposed project and to incorporate mitigation measures into the project design, as necessary, to reduce or eliminate the significant or potentially significant effects of the project.

1.3 Public Review Process

In accordance with CEQA, a good faith effort has been made during the preparation of this IS/MND to contact affected agencies, organizations, and persons who may have an interest in this project.

In reviewing the IS/MND, affected public agencies and the interested public should focus on the sufficiency of the document in identifying and analyzing the project's possible impacts on the environment. The Draft IS/MND and related documents are available for review on City's website (https://www.yourrialto.com/314/Current-Projects).

Comments on the IS/MND may be made in writing before the end of the public review period. Following the close of the public comment period, the City will consider this IS/MND and comments thereto in determining whether to approve the proposed project.

Written comments on the IS/MND should be sent to the following address by March 12, 2026.

City of Rialto
Community Development Department
150 South Palm Avenue
Rialto, California 92376
Contact: Daniel Rosas, MPA
Email: drosas@rialtoca.gov

1.4 Initial Study Checklist

Dudek, under the City's guidance, prepared the project's Environmental Checklist (i.e., IS) per CEQA Guidelines Sections 15063–15065. The CEQA Guidelines include a suggested checklist to indicate whether a project would have an adverse impact on the environment. The checklist is found in Section 3 of this document. Following the Environmental Checklist, Sections 3.1 through 3.21 include an explanation and discussion of each significance determination make in the checklist for the project.

For this IS/MND, the following four possible responses to each individual environmental issue area are included in the checklist:

1. Potentially Significant Impact
2. Less-than-Significant Impact with Mitigation Incorporated
3. Less-than-Significant Impact
4. No Impact

The checklist and accompanying explanation of checklist responses provide the information and analysis necessary to assess relative environmental impacts of the project. In doing so, the City will determine the extent of additional environmental review, if any, for the project.

2 Project Description

2.1 Project Location

The project site is located in the central part of the City in the southwestern portion of San Bernardino County. Regionally, the City is bordered by unincorporated Riverside County and the Cajon Pass to the north, the Cities of San Bernardino and Colton to the east, unincorporated Riverside County and the City of Riverside to the south, and the City of Fontana to the west. Locally, the project site is bounded to the north by vacant land and the Rialto Channel, to the east by a self-storage facility and the Rialto Channel, and to the east and south by industrial uses. (Figure 2-1, Project Location). The project site is composed of three parcels (Assessor's Parcel Numbers 0132-182-08, 0132-182-09, and 0132-202-04) (Figure 2-2, Aerial Overview). Regional access to the project area is provided by Interstate (I) 10 to the south, I-215 to the east, and State Route (SR) 66 to the north.

2.2 Environmental Setting

City of Rialto

The City's land use pattern is defined by nearly 100 years of historical growth. The historic downtown and surrounding older neighborhoods, with smaller residential lots and small central business district, provide a walkable urban core. Suburban tract homes from the 1950s and 1960s, away from downtown, have defined much of the City. Newer residential neighborhoods have filled in the northern areas.

Commercial uses are focused along Foothill Boulevard (Historic Route 66), Riverside Avenue, Valley Boulevard, and Baseline Road at Riverside Avenue. These corridors and intersections, along with downtown, constitute the City's major commercial areas.

Industrial and warehouse facilities are clustered along the City's rail lines, where access to shipping facilities was important through the mid-1900s, particularly for the citrus industry. Other industrial activities have clustered north of SR-210 and south of I-10. Other industrial areas include land adjacent to the Rialto Airport in the north and near SR-210, and I-10 and the Union Pacific railroad line in the south. Many of the industrial businesses take advantage of the City's location and access to this distribution network (City of Rialto 2010).

Gateway Specific Plan

The project site is located within the boundaries of the City's Gateway Specific Plan area. The Gateway Specific Plan is intended to revitalize and upgrade the Gateway area of the City. The Gateway Specific Plan proposes a mixed-use project with retail uses along Riverside Avenue, office and research and development parks fronting on San Bernardino Avenue, freeway commercial (hotels, eating establishments, and auto services) along Valley Boulevard, and light industrial parks in the western portion of the plan area (City of Rialto 1990).

Project Site

The approximately 6.02-gross-acre project site is located on the northeast corner of South Willow Avenue and West Valley Boulevard (Figure 2-2). The project site is composed of an existing office building on the central portion of the site and vacant land on the northern portion of the site.

The City's General Plan Existing Land Use Map designates the project site as General Commercial with a Specific Plan overlay (Figure 2-3, General Plan Land Use) (City of Rialto 2023a). The City's Zoning Map designates the project site as Gateway Specific Plan (Figure 2-4, Zoning) (City of Rialto 2013). Specifically, the Gateway Specific Plan designates the project site as Freeway Commercial (F-C) (Figure 2-5, Gateway Specific Plan) (City of Rialto n.d.). Regional access to the project area is provided by I-10 south of the project site, I-15 west of the site, and I-215 east of the site.

Surrounding Land Uses

The project site is located in a predominantly urbanized area of the City. Specific land uses in the immediate project area consist of the following:

- **North:** vacant lot and the Rialto Channel
- **East:** self-storage facility and the Rialto Channel
- **South:** West Valley Boulevard and industrial uses
- **West:** South Willow Avenue and industrial uses

2.3 Project Characteristics

The project would involve demolition of the existing building, which includes an industrial warehouse with support offices, and construction of two industrial/warehouse buildings totaling approximately 119,700-square-foot (gross area, inclusive of office/mezzanine space) one-story industrial warehouses on the project site (Figure 2-6, Site Plan). Building 1, on the northern portion of the project site, would be composed of approximately 66,810 square feet of warehouse space, 2,400 square feet of mezzanine space, and 4,000 square feet of office space. Building 2, on the southern portion of the project site, would be composed of approximately 43,558 square feet of warehouse space, 1,200 square feet of mezzanine space, and 2,000 square feet of office space. The project would also include approximately 51,477 square feet of landscaping, 111 passenger-vehicle parking spaces, and 12 loading docks. The project would not contain any cold storage space.

On- and Off-Site Improvements

The project would also include improvements along the project's street frontage, including landscaping, fencing, and street and sidewalk improvements. A variety of trees, shrubs, and groundcovers would be planted within the project frontage's landscape setback area, within the landscape areas found around the warehouse buildings, and throughout the project site.

Site Access and Parking

Access to the project site would be provided by four driveways: three driveways on the western portion of the site on S Willow Avenue, and one driveway on the southern portion of the site on W Valley Boulevard. The three western driveways would serve passenger vehicles and trucks and would be full access (i.e., no restrictions on turning movements). The one southern driveway would serve passenger vehicles.

The project would include a total of 111 passenger parking stalls and 12 high dock door parking stalls. A summary of passenger vehicle parking is provided in Table 2-1.

Table 2-1. Summary of Passenger Parking Stalls

Passenger Parking Stall Type	Number of Stalls
Building 1	
Standard	47
Van ADA	1
Standard ADA	2
Van EVCS	1
Standard EVCS	1
EV Capable	10
Total Passenger Parking Stalls	*62*
High Dock Door Stalls Provided	*7*
Passenger Parking Stalls Required	*60*
Building 2	
Standard	39
Van ADA	1
Standard ADA	1
Van EV	1
Standard EV	1
EVCS	1
Total Passenger Parking Stalls	*49*
High Dock Door Stalls Provided	*5*
Passenger Parking Stalls Required	*38*
Total Stalls	**111**

Note: ADA = Americans Disability Act, EVCS = Electric Vehicle Charging Station, EV = Electric Vehicle.

Utility Improvements

The project site is currently served by domestic water, sanitary sewer, electrical, natural gas, and telecommunication service. The project would connect to the existing facilities located on and in the immediate vicinity of the project site.

Domestic Water

Domestic water would be provided to the project site by the Rialto Public Works Department Water Division. Water service is provided for residential, commercial, industrial, governmental, and landscaping purposes. The project site is already served by an existing water lines within West Valley Boulevard and South Willow Avenue.

Sanitary Sewer

Rialto's sewer system is maintained by the City. The sewage from Rialto is treated at the Rialto Wastewater Treatment Plant, which is currently under construction to expand the facility. The project site is already served by an existing sanitary sewer lines within West Valley Boulevard and South Willow Avenue.

Natural Gas, Electrical Service, and Telecommunications

The Southern California Gas Company would provide natural gas service to the project site. Southern California Edison would provide electric service. Telecommunication services are provided by AT&T. The project site is already served by these facilities on the southern portion of the project site.

Storm Drainage

The project proposes an internal storm drain system to collect runoff and route drainage into on-site basins throughout the project site. Flows would generally be conveyed from the north to the south, ultimately entering a basin along the side edge on the project site, on the north side of Valley Boulevard. From this point, flows would outflow into the existing under sidewalk drain in Valley Boulevard. There is an existing catch basin in Valley Boulevard, above the trap channel to the east of the project site.

2.4 Project Construction and Phasing

The project applicant intends to commence construction before the end of 2026. Construction was assumed to commence in July 2026 and last approximately 12 months. The first full year of operation was assumed to be 2028. Table 2-2 provides a tentative project construction schedule, as used in air quality and greenhouse gas (GHG) emissions impact analysis (refer to Section 3.3, Air Quality, and Section 3.8, Greenhouse Gas Emissions, of this IS/MND; also see Appendix A, Air Quality, Greenhouse Gas Emission, and Energy Modeling Inputs and Outputs).

Table 2-2. Anticipated Project Construction Schedule

Construction Phase	Duration	Phase Start Date	Phase End Date
Demolition	4 weeks	July 2026	July 2026
Site Preparation	2 weeks	August 2026	August 2026
Grading	4 weeks	August 2026	September 2026
Building Construction	35 weeks	September 2026	May 2027
Paving	4 weeks	June 2027	June 2027
Architectural Coating	2 weeks	July 2027	July 2027

2.5 Project Approvals

The actions and/or approvals that the City needs to consider for the proposed project include, but are not limited to, the following. This list is preliminary, and may not be comprehensive:

Lead Agency Approvals

- Conditional Development Permit
- Tentative Parcel Map
- Precise Plan of Design
- Master Case
- General Plan Amendment
- Specific Plan Amendment

Subsequent non-discretionary approvals (which would require separate processing through the City) would include, but may not be limited to, a demolition permit, grading permit, building permits, and occupancy permits.

3 Initial Study Checklist

1. **Project title:**

   Willow and Valley Warehouses Project

2. **Lead agency name and address:**

   City of Rialto
   Community Development Department
   150 South Palm Avenue
   Rialto, California 92376

3. **Contact person and phone number:**

   Daniel Rosas, MPA
   Senior Planner
   crosas@rialtoca.gov
   909.820.8047

4. **Project location:**

   The approximately 6.02-gross-acre project site is located on the northeast corner of South Willow Avenue and West Valley Boulevard. The project site is comprised of three parcels (Assessor's Parcel Numbers 0132-182-08, 0132-182-09, and 0132-202-04).

5. **Project sponsor's name and address:**

   Mr. Brian Bargeman, Investment Building Group
   5100 Campus Drive, Suite 300
   Newport Beach, California 92660

6. **General plan designation:**

   General Commercial with a Specific Plan overlay

7. **Zoning:**

   Gateway Specific Plan

8. **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 features necessary for its implementation. Attach additional sheets if necessary):**

   The project would involve demolition of the existing office and warehouse building and construction of two industrial/warehouse buildings totaling approximately 119,700-square-foot (gross area, inclusive of office/mezzanine space) one-story industrial warehouses on the project site (Figure 2-6). Building 1, on the

northern portion of the project site, would be composed of approximately 66,810 square feet of warehouse space, 2,400 square feet of mezzanine space, and 4,000 square feet of office space. Building 2, on the southern portion of the project site, would be composed of approximately 43,558 square feet of warehouse space, 1,200 square feet of mezzanine space, and 2,000 square feet of office space. Mezzanine space in each building would also be used as office space. The project would also include approximately 51,477 square feet of landscaping, 111 passenger-vehicle parking spaces, and 12 loading docks. The project would not contain any cold storage space.

9. **Surrounding land uses and setting (Briefly describe the project's surroundings):**

The project site is surrounded by existing industrial, warehousing, and storage uses. More specifically, west of the project site is an existing industrial warehouse, east of the project site is an existing self-storage yard. South of the project site is a combination of outdoor storage yards, including pallet storage, with commercial auto-services to the southwest. North of the project site is a concrete-lined portion of the Rialto Channel.

10. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):**

No outside public agency approvals are required.

11. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

Yes. Refer to Section 3.18, Tribal Cultural Resources, for additional details.

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	☐ Agriculture and Forestry Resources	☐ Air Quality
☒ Biological Resources	☒ Cultural Resources	☐ Energy
☐ Geology and Soils	☐ Greenhouse Gas Emissions	☐ Hazards and Hazardous Materials
☐ Hydrology and Water Quality	☐ Land Use and Planning	☐ Mineral Resources
☒ Noise	☐ Population and Housing	☐ Public Services
☐ Recreation	☐ Transportation	☒ Tribal Cultural Resources
☐ Utilities and Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

Determination (To be completed by the Lead Agency)

On the basis of this initial evaluation:

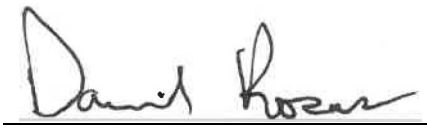
☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ 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 ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

2/5/2026

Date

Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
    a. Earlier Analysis Used. Identify and state where they are available for review.
    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c. Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
    a. The significance criteria or threshold, if any, used to evaluate each question; and
    b. The mitigation measure identified, if any, to reduce the impact to less than significance

3.1 Aesthetics

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
I.	**AESTHETICS** – Except as provided in Public Resources Code Section 21099, would the project**:**				
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

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

Less-Than-Significant Impact. Scenic vistas and other important visual resources are typically associated with natural landforms such as mountains, foothills, ridgelines, coastlines, and open space areas. The City of Rialto General Plan Land Use Element Update states that "the views of the San Gabriel and San Bernardino Mountains and the foothills provide the perfect backdrop for creating scenic vistas throughout the City," and "the City should take great care in ensuring that building heights and scale of projects do not hinder or impede scenic view" (City of Rialto 2023a).

The San Gabriel Mountains and the San Bernardino Mountains are located approximately 9 miles northwest and northeast of the project site, and the Jurupa Mountains and foothills are located approximately 3.5 miles southwest of the project site. Based on these distances, as well as the presence of existing intervening natural topographical variations and built urban features, the project site is not located within the direct viewshed of these scenic vistas. In addition, the project would extend to heights similar as the heights of other industrial/warehouse buildings surrounding the project site. As such, the project is not expected to block views of or from these scenic resources; therefore, impacts associated with scenic vistas would be less than significant.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. According to the California Department of Transportation (Caltrans) California Scenic Highway Mapping System (Caltrans 2019), the only officially designated state scenic highway in San Bernardino County is a 16-mile portion of SR-38 from South Fork Campground to State Lane. This roadway segment is located more than 30 miles east of the project site. Based on the distance between this officially designated state scenic highway, and because of the intervening natural topography and urban improvements between this roadway segment and the project site, the project would not be located within the viewshed of this officially designated state scenic highway. In addition, the Rialto General Plan Update does not identify any designated scenic corridors (City of Rialto 2023a); therefore, no impact associated with scenic highways would occur.

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

Short-Term Construction Impacts

Less-Than-Significant Impact. Consistent with standard construction practices, equipment, vehicles, and materials are expected to be staged within a designated area on the project site during project construction. Although equipment staging could potentially be viewed from adjacent properties, this would be temporary and would cease upon completion of construction; therefore, short-term construction impacts associated with the existing visual character and quality would be less than significant.

Long-Term Operational Impacts

Less-Than-Significant Impact. The project site is located in an urbanized, industrial portion of the City, and is bound by existing and future development in all directions. The project site is currently composed of an office building and vacant land. The project would have a similar land use and development intensity as the existing site and would not significantly alter the existing visual character of the project site compared with existing conditions.

However, as warehouse buildings, the project would be visually consistent with the existing industrial development. The project would extend to heights similar to the heights of other industrial/warehouse buildings surrounding the project site. In addition, the approximately 119,700-square-foot project would be of similar size and scale compared to existing surrounding development in the project area. Thus, development of the project would not represent an adverse or detrimental impact on existing on-site or off-site visual character.

Regarding visual quality, the project would incorporate similar architectural elements to existing development located in the project area, including a complementary neutral color palette and a variety of building materials. Setback landscape areas along the project's frontages would also soften views of the project site and enhance the visual quality of the project.

In addition, to ensure that both current and future development within the City is designed and constructed to conform to existing visual character and quality of the surrounding built environment, the City's Zoning Code includes design standards related to building height, parking, landscaping requirements, and other visual considerations. The purpose is to regulate the uses of buildings and structures, and to encourage the most appropriate use of land. As a part of the City's development review process, project plans are reviewed with the intent of encouraging efficient, aesthetic, and desirable use of land. Therefore, long-term operational impacts associated with existing visual character and quality would be less than significant.

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Short-Term Construction Impacts

No Impact. In compliance with the City's Noise Ordinance (Chapter 9.50 of the Rialto Municipal Code), from October 1 through April 30, construction activities of the project would be limited to between 7:00 a.m. and 5:30 p.m. on Monday through Friday, and between 8:00 a.m. and 5:00 p.m. on Saturday. No construction work is permissible on Sunday or state holidays. From May 1 through September 30, construction work would be limited to between 6:00 a.m. and 7:00 p.m. on Monday through Friday, and between 8:00 a.m. and 5:00 p.m. on Saturday. No construction work is permissible on Sundays or state holidays (City of Rialto 2021a). As such, project construction would be limited to the daytime hours, and nighttime lighting would not be required until the project is operational; therefore, no short-term construction impacts associated with light and glare would occur.

Long-Term Operational Impacts

Less-Than-Significant Impact. Consistent with Section 18.61.140 of the City's Zoning Code, exterior lighting would be provided for security and safety purposes; however, the lighting would be designed to avoid spillover glare beyond the project site. Thus, all exterior lighting has been designed to be shielded/hooded to prevent light trespass onto nearby properties. In addition, the project would use a variety of non-reflective building materials, and although some new reflective materials (i.e., windows) would be introduced onto the project site, the project as a whole would not be a source of glare in the project area; therefore, long-term operational impacts associated with light and glare would be less than significant.

3.2 Agriculture and Forestry Resources

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
II.	**AGRICULTURE AND FORESTRY RESOURCES** – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d)	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

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

No Impact. The project site currently consists of developed and vacant land and is not used for agricultural purposes. According to the California Department of Conservation Important Farmland Finder (CDOC 2016), the project site is identified as "Urban and Built-Up Land." The project site does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (collectively, "Important Farmland"). The project would not occur within any farmland locations and would not result in the conversion of Prime or

Unique Farmland, or Farmland of Statewide Importance; therefore, no impacts associated with the conversion of Important Farmland would occur.

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

No Impact. Refer to Section 3.2(a).

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

No Impact. The project site is zoned as Gateway Specific Plan—Freeway Commercial and is located within a developed area. There are no areas zoned for forest land within the vicinity of the project site. Therefore, no impacts associated with forest land would occur.

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

No Impact. Refer to Section 3.2(c). The proposed project would not involve the conversion of forest land to non-forest use. Therefore, no impact with forest land would occur.

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

No Impact. Refer to Section 3.2(a). The project site is zoned as Gateway Specific Plan—Freeway Commercial and is located within a developed area. Further, no off-site improvement associated with the project would result in changes to other properties designated as Farmland or forest land. There are no areas zoned for agricultural use or identified as forest land within the vicinity of the project site. Therefore, no impacts associated with forest land would occur.

3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

The following analysis is based on the November 2025 Willow and Valley Warehouses Project - Air Quality and Greenhouse Gas Emissions Technical Memorandum (Appendix A) prepared by Dudek. For additional details, see Appendix A for the emissions calculation methodology and assumptions.

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

Less-Than-Significant Impact. The project site is located within the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties and all of Orange County, and is within the jurisdictional boundaries of South Coast Air Quality Management District (SCAQMD).

SCAQMD administers SCAB's Air Quality Management Plan (AQMP), which is a comprehensive document outlining an air pollution control program for attaining all California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The AQMP is the regional path towards improving air quality and meeting federal standards for air pollutants, and each AQMP incorporates significant new scientific data, primarily in the form of updated emissions inventories, ambient measurements, new meteorological episodes, and new air quality modeling tools. The most recent approved SCAQMD AQMP is the 2022 AQMP (SCAQMD 2022), which was adopted by the SCAQMD Governing Board in December 2022. The SCAQMD 2022 AQMP was developed to address the attainment of the 2015 national 8-hour O_3 ambient air quality standard (70 parts per billion) for the SCAB and Coachella Valley. The 2022 AQMP provides actions, strategies, and steps needed to reduce air pollutant emissions and meet the O_3 standard by 2037.

The purpose of a consistency finding with regard to the AQMP is to determine if a project is consistent with the assumptions and objectives of the regional air quality plans, and if it would interfere with the region's ability to comply with federal and state air quality standards. SCAQMD has established criteria for determining consistency with the currently applicable AQMP in Chapter 12, Sections 12.2 and 12.3 of the SCAQMD CEQA Air Quality Handbook. These criteria are (SCAQMD 1993):

- Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP.
- Whether the project would exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

To address the first criterion, project-generated criteria air pollutant emissions have been estimated and analyzed for significance and are addressed in Section 3.3(b) below. As presented in Section 3.3(b),

construction and operation of the project would not generate criteria air pollutant emissions that exceed SCAQMD's thresholds.

The second criterion regarding the project's potential to exceed the assumptions in the AQMP or increments based on the year of project buildout and phase is primarily assessed by determining consistency between the project's land use designations and its potential to generate population growth. In general, projects are considered consistent with, and not in conflict with or obstructing implementation of, the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook). SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, and employment by industry) developed by the Southern California Association of Governments (SCAG) for its Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Thus, demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by SCAG for their 2020-2045 RTP/SCS (SCAG 2020) were used to estimate future emissions in the 2022 AQMP (SCAQMD 2022).[1,2] The SCAG 2020–2045 RTP/SCS, and associated Regional Growth Forecast, are generally consistent with the local plans; therefore, the 2022 AQMP is generally consistent with local government plans.

As explained in Section 3.11(b), the project site is designated General Commercial in the Rialto General Plan, and zoned Gateway Specific Plan – Freeway Commercial. The project is proposing a specific plan amendment to change the project site's specific plan land use designation from Freeway Commercial to Industrial Park (I-P). These future uses would include those related to warehouse, distribution, and/or logistics, which is generally consistent with the permissible uses and activities allowed by the City in the I-P zone. Additionally, the I-P land use designation has already been accounted for within the Gateway Specific Plan, and this specific plan amendment would continue the existing pattern of industrial park uses along the Rialto Channel within the Gateway Specific Plan. Further, the project would redevelop an existing warehouse/office use. Overall, implementation of the project would not generate an increase in growth demographics that would conflict with existing projections within the region. Accordingly, the project is consistent with the SCAG RTP/SCS forecasts used in the SCAQMD AQMP development.

In summary, based on the considerations presented for the two criteria, impacts relating to the project's potential to conflict with or obstruct implementation of the applicable AQMP would be less than significant.

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

Less-Than-Significant Impact. Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level

1 SCAG adopted Connect SoCal 2024, the 2024-2050 RTP/SCS (SCAG 2024), but the growth projections therein have not yet been incorporated into an adopted AQMP.

2 Information necessary to produce the emission inventory for the SCAB is obtained from the SCAQMD and other governmental agencies, including CARB, the California Department of Transportation, and SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socioeconomic Projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. SCAG incorporates these data into their Travel Demand Model for estimating/Projecting vehicle miles traveled and driving speeds. SCAG's socioeconomic and transportation activities Projections in their 2020–2045 RTP/SCS are integrated in the 2022 AQMP (SCAQMD 2022).

thresholds of significance for criteria pollutants are relevant in the determination of whether a project's individual emissions would have a cumulatively significant impact on air quality. If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.

SCAQMD has adopted thresholds to address the significance of air quality impacts resulting from a project. A project would result in a substantial contribution to an existing air quality violation of the NAAQS or CAAQS for ozone (O_3), which is a nonattainment pollutant, if the project's construction emissions would exceed SCAQMD's volatile organic compound (VOC) or oxides of nitrogen (NO_x) significance thresholds shown in Table 3.3-1. These emission-based thresholds for O_3 precursors are intended to serve as a surrogate for an "ozone significance threshold" (i.e., the potential for adverse O_3 impacts to occur) because O_3 itself is not emitted directly, and the effects of an individual project's emissions of O_3 precursors (VOC and NO_x) on O_3 levels in ambient air cannot be determined through air quality models or other quantitative methods. The SCAB is also nonattainment for the state particulate matter with an aerodynamic diameter less than or equal to 10 microns in size (coarse particulate matter, or PM_{10}) and federal and state particulate matter with an aerodynamic diameter less than or equal to 2.5 microns in size (fine particulate matter, or $PM_{2.5}$) standards. The San Bernardino County portion of the SCAB is designated attainment/maintenance or unclassified for all other NAAQS and CAAQS (CARB 2023, EPA 2025).

Table 3.3-1. SCAQMD Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds - Regional		
Pollutant	**Construction (pounds per day)**	**Operation (pounds per day)**
VOCs	75	55
NO_x	100	55
CO	550	550
SO_x	150	150
PM_{10}	150	150
$PM_{2.5}$	55	55
Lead[a]	3	3
Toxic Air Contaminants (TACs) and Odor Thresholds		
TACs[b]	Maximum incremental cancer risk ≥10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥1 in 1 million) Chronic and acute hazard index ≥1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
Ambient Air Quality Standards for Criteria Pollutants[c]		
NO_2 1-hour average NO_2 annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.030 ppm (state) and 0.0534 ppm (federal)	
CO 1-hour average CO 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	

Table 3.3-1. SCAQMD Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds - Regional	
PM_{10} 24-hour average	10.4 μg/m³ (construction)[d] 2.5 μg/m³ (operation)
PM_{10} annual average	1.0 μg/m³
$PM_{2.5}$ 24-hour average	10.4 μg/m³ (construction)[d] 2.5 μg/m³ (operation)

Source: SCAQMD 2023.
Notes: SCAQMD = South Coast Air Quality Management District; VOC = volatile organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; TAC = toxic air contaminant; NO_2 = nitrogen dioxide; ppm = parts per million by volume; μg/m³ = micrograms per cubic meter.
greenhouse gas emissions thresholds for industrial projects, as added in the March 2015 revision to the SCAQMD Air Quality Significance Thresholds, were not include included in this table as they are addressed within the greenhouse gas emissions analysis and not the air quality analysis.

[a] The phaseout of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.
[b] TACs include carcinogens and noncarcinogens.
[c] Ambient air quality standards for criteria pollutants are based on SCAQMD Rule 1303, Table A-2, unless otherwise stated.
[d] Ambient air quality threshold are based on SCAQMD Rule 403.

Construction Emissions

Proposed construction activities would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment, soil disturbance, and VOC off-gassing) and off-site sources (i.e., on-road vendor trucks, haul trucks, and worker vehicle trips). Construction emissions can vary substantially from day to day, depending on the level of activity; the specific type of operation; and, for particulate matter, the prevailing weather conditions. Therefore, such emission levels can only be approximately estimated.

The California Emissions Estimator Model (CalEEMod) Version 2022.1.1.32 was used to estimate emissions from construction of the project. Internal combustion engines used by construction equipment, trucks, and worker vehicles would result in emissions of VOCs, NO_x, carbon monoxide (CO), sulfur oxides (SO_x), PM_{10}, and $PM_{2.5}$. PM_{10} and $PM_{2.5}$ emissions would also be generated by entrained dust, which results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil. The project would be required to comply with SCAQMD Rule 403 to control dust emissions generated during any dust-generating activities. Standard construction practices that would be employed to reduce fugitive dust emissions include watering of the active dust areas two times per day, with additional watering depending on weather conditions. The CalEEMod default assumptions were used for estimating fugitive dust emissions from grading on site. The project would involve application of architectural coating (e.g., paint and other finishes) for painting the interior and exterior of the building as well as parking lot striping. As a project design feature, only low-VOC coatings will be used for the building interiors and exteriors.

CalEEMod calculates maximum daily emissions for summer and winter periods. The estimated maximum daily construction emissions are summarized in Table 3.3-2. Details of the emission calculations are provided in Appendix A.

Table 3.3-2. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Year	VOC	NOx	CO	SOx	PM_{10}	$PM_{2.5}$
	pounds per day					
Summer						
2026	1.86	16.21	16.94	0.04	4.13	1.93
2027	54.37	8.51	16.12	0.03	2.06	0.67
Winter						
2026	1.28	9.01	14.81	0.03	2.09	0.69
2027	1.23	8.63	14.32	0.03	2.06	0.67
Maximum Daily Emissions	**54.37**	**16.21**	**16.94**	**0.04**	**4.13**	**1.93**
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Appendix A.
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District.
Emissions include compliance with SCAQMD Rules 403 and use of low-VOC architectural coatings (i.e., no more than 50 grams per liter VOC content) for building interiors and exteriors.

As shown in Table 3.3-2, project construction would not exceed SCAQMD's daily thresholds. Therefore, construction impacts associated with criteria air pollutant emissions would be less than significant.

Operational Emissions

Operation of the project would generate criteria pollutant emissions from mobile sources (vehicular traffic), area sources (consumer products, architectural coatings, landscaping equipment), energy sources (natural gas combustion), and off-road equipment (CNG forklifts). In addition, the sources of emissions associated with the existing uses to be demolished were also quantified. Table 3.3-3 presents the emissions from the project and existing baseline scenarios, as well as the estimated net change in emissions (project minus the existing scenario). Details of the emission calculations are provided in Appendix A.

Table 3.3-3. Estimated Maximum Daily Operation Criteria Air Pollutant

Emissions Source	VOC	NOx	CO	SOx	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Project						
Summer						
Mobile	0.34	3.95	4.79	0.04	1.95	0.55
Area	3.75	0.04	5.22	<0.01	0.01	0.01
Energy	0.03	0.61	0.51	<0.01	0.05	0.05
Off-Road	0.00	13.25	132.15	0.00	0.00	0.00
Project Summer Total	***4.12***	***17.86***	***142.67***	***0.04***	***2.01***	***0.61***
Winter						
Mobile	0.32	4.13	4.25	0.04	1.95	0.55
Area	2.89	0.00	0.00	0.00	0.00	0.00

Table 3.3-3. Estimated Maximum Daily Operation Criteria Air Pollutant

Emissions Source	VOC	NOx	CO	SOx	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Energy	0.03	0.61	0.51	<0.01	0.05	0.05
Off-Road	0.00	13.25	132.15	0.00	0.00	0.00
Project Winter Total	***3.25***	***18.00***	***136.91***	***0.04***	***2.00***	***0.60***
Existing						
Summer						
Mobile	0.13	1.70	1.79	0.01	0.53	0.15
Area	1.03	0.01	1.43	<0.01	<0.01	<0.01
Energy	0.01	0.17	0.14	<0.01	0.01	0.01
Existing Summer Total	***1.17***	***1.88***	***3.36***	***0.01***	***0.55***	***0.17***
Winter						
Mobile	0.12	1.78	1.58	0.01	0.53	0.15
Area	0.79	0.00	0.00	0.00	0.00	0.00
Energy	0.01	0.17	0.14	<0.01	0.01	0.01
Existing Winter Total	***0.92***	***1.95***	***1.73***	***0.01***	***0.55***	***0.17***
Net Change in Emissions						
Summer Net Change (Project – Existing)	**2.96**	**15.97**	**139.30**	**0.03**	**1.46**	**0.44**
Winter Net Change (Project – Existing)	**2.33**	**16.05**	**135.19**	**0.03**	**1.45**	**0.43**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Appendix A.
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District.
Values of "<0.01" indicate that the estimated emissions are less than the model limits.
Columns may not sum due to rounding.

As shown in Table 3.3-3, the net increase in criteria air pollutant emissions associated with project operations would not exceed SCAQMD's significance thresholds and, therefore, operational impacts associated with criteria air pollutant emissions would be less than significant.

Cumulative

In considering cumulative impacts from the project, the analysis must specifically evaluate a project's contribution to the cumulative increase in pollutants for which the SCAB is designated as nonattainment for the CAAQS and NAAQS. If a project's emissions would exceed SCAQMD's significance thresholds, it would be considered to have a cumulatively considerable contribution to nonattainment status in the SCAB. If a project does not exceed thresholds and is determined to have less than significant project-specific impacts, it may still contribute to a significant cumulative impact on air quality. The basis for analyzing the project's cumulatively considerable contribution is if the project's contribution accounts for a significant proportion of the cumulative total emissions (i.e., it represents a "cumulatively considerable contribution" to the cumulative air quality impact) and consistency with SCAQMD's 2022 AQMP, which addresses cumulative emissions in the SCAB.

The SCAB has been designated as a federal nonattainment area for O_3 and $PM_{2.5}$ and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. The nonattainment status is the result of cumulative emissions from various sources of air pollutants and their precursors within the SCAB, including motor vehicles, off-road equipment, and commercial and industrial facilities. Construction of the project would generate VOC and NO_x emissions (which are precursors to O_3) and emissions of PM_{10} and $PM_{2.5}$. As indicated in Tables 3.3-2 and 3.3-3, project-generated construction and operational emissions would not exceed SCAQMD's emission-based significance thresholds for VOC, NO_x, CO, SO_2, PM_{10}, or $PM_{2.5}$. In addition, the project would not conflict with the SCAQMD AQMP, as evaluated previously. Based on these considerations, the project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants, and cumulative impacts would be less than significant.

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

Less-Than-Significant Impact. The assessment below includes a localized significance threshold (LST) analysis to evaluate the potential of localized criteria air quality impacts to sensitive receptors in the immediate vicinity of the project, a qualitative CO hotspot analysis, health effects from exposure to other criteria air pollutants, exposure to TACs, and potential Valley Fever exposure.

Localized Significance Thresholds

In addition to the emission-based thresholds listed in Table 3.3-1, SCAQMD also recommends the evaluation of localized air quality impacts to sensitive receptors in the immediate vicinity of the project as a result of construction and operational activities. Regarding the LST analysis, for project sites that disturb 5 acres or less, the SCAQMD LST Methodology includes lookup tables that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance criteria (i.e., the emissions would not cause an exceedance of the applicable concentration limits for NO_2, CO, PM_{10}, and $PM_{2.5}$) without performing project-specific dispersion modeling (SCAQMD 2008a). For projects that exceed 5 acres, such as the proposed project, the maximum number of acres disturbed on the peak day was estimated using the Fact Sheet for Applying CalEEMod to Localized Significance Thresholds, which provides estimated acres per 8-hour day for crawler tractors, graders, rubber-tired dozers, and scrapers (SCAQMD n.d.). Based on SCAQMD guidance and on anticipated equipment usage per day, it was estimated that the maximum number of acres on the project site that would be disturbed by off-road equipment would be approximately 2.5-acres during the site preparation phase based on the potential operation of one grader and two scrapers in an 8-hour shift. Therefore, the LST look-up values can be used to determine localized significance.

The LST significance thresholds for NO_2 and CO represent the allowable increase in concentrations above background levels in the vicinity of a project that would not cause or contribute to an exceedance of the relevant ambient air quality standards, while the threshold for PM_{10} represents compliance with Rule 403 (Fugitive Dust). The LST significance threshold for $PM_{2.5}$ is intended to ensure that construction emissions do not contribute substantially to existing exceedances of the $PM_{2.5}$ ambient air quality standards. The allowable emission rates depend on the following parameters:

1. Source receptor area (SRA) in which the project is located
2. Size of the project site
3. Distance between the project site and the nearest sensitive receptor (e.g., residences, schools, hospitals)

The project site is located in SRA 34 (Central San Bernardino Valley). LST pollutant screening level concentration data is currently published for 1-, 2-, and 5-acre sites for varying distances (25, 50, 100, 200, and 500 meters). Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. People most likely to be affected by air pollution include children, the elderly, athletes, and people with cardiovascular and chronic respiratory diseases. Facilities and structures where these air-pollution-sensitive people live or spend considerable amounts of time are known as "sensitive receptors." According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993).

The surrounding areas are primarily commercial and industrial. The nearest sensitive receptors are along South Lilac Avenue, with single family residences located approximately 375 meters (1,230 feet) west of the project site boundary and Joe Baca Middle School located approximately 465 meters (1,526 feet) from the project site boundary. The proximate residences represent the nearest receptor to the project site where an individual could remain for 24 hours. The nearest residential land use has been used to determine construction air quality impacts for emissions of PM_{10} and $PM_{2.5}$, since PM_{10} and $PM_{2.5}$ thresholds are based on a 24-hour averaging time. The LST methodology also provides that LSTs based on shorter averaging periods, such as the NO_2 and CO LSTs, may be applied to receptors such as industrial or commercial facilities since a worker at these sites could be present for periods of 1 to 8 hours (SCAQMD 2008a). As the project site is adjacent to industrial/commercial land uses, these were used to determine LST impacts for NO_2 and CO because an individual could be present at those sites for periods of 1 to 8 hours. For operations, based on the total project site of 6.02-acres, LST values for a 5-acre project site were used to be conservative. LSTs are more stringent for smaller areas (i.e., 1-acre is more stringent than 2-acre and 5-acre LSTs); therefore, the use of a 5-acre LST for operations is conservative.

Construction activities associated with the project would result in temporary sources of on-site fugitive dust, on-road vehicles, and construction equipment emissions. During operation, emissions from area sources (landscaping equipment), energy (natural gas combustion), on-site cars and trucks, and CNG forklifts were included in the localized analysis. The passenger vehicle and truck trips during construction and operation were modeled using a 0.25-mile trip distance to capture localized emissions. The maximum allowable daily emissions that would satisfy the SCAQMD localized significance criteria for SRA 34 are presented in Table 3.3-4 and compared to the maximum daily on-site construction and operational emissions.

Table 3.3-4. Localized Significance Thresholds Analysis for the Project

Pollutant	Project Emissions (Pounds per Day)	LST Criteria (Pounds per Day)	Exceeds LST?
Construction[a]			
Summer			
NO_2	16.00	187	No
CO	16.21	1,101	No
PM_{10}	3.34	158	No
$PM_{2.5}$	1.87	74	No
Winter			
NO_2	7.57	187	No

Table 3.3-4. Localized Significance Thresholds Analysis for the Project

Pollutant	Project Emissions (Pounds per Day)	LST Criteria (Pounds per Day)	Exceeds LST?
CO	9.44	1,101	No
PM_{10}	0.28	158	No
$PM_{2.5}$	0.24	74	No
Operations[b]			
Summer			
NO_2	14.36	270	No
CO	138.89	1,746	No
PM_{10}	0.09	43	No
$PM_{2.5}$	0.06	21	No
Winter			
NO_2	14.34	270	No
CO	133.78	1,746	No
PM_{10}	0.08	43	No
$PM_{2.5}$	0.06	21	No

Source: SCAQMD 2009.
Notes: LST = localized significance threshold; NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter.
See Appendix A for detailed results.
These estimates reflect control of fugitive dust required by Rule 403 and represent the worst-case operating scenario during construction.
[a] For construction, LSTs were determined based on the values for a 2.5-acre site at a distance of 375 meters from the nearest sensitive residential receptor for PM_{10} and $PM_{2.5}$ and 25 meters from the nearest industrial/commercial receptor for NO_2 and CO.
[b] For operations, LSTs were determined based on the values for a 5-acre site at a distance of 375 meters from the nearest sensitive residential receptor for PM_{10} and $PM_{2.5}$ and 25 meters from the nearest industrial/commercial receptor for NO_2 and CO.

As shown in Table 3.3-4, the project LST would not exceed the established significance thresholds, and thus, would result in a less than significant localized impact to sensitive receptors during construction and operation.

CO Hotspots

Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed federal and/or state standards for CO are termed CO "hotspots." CO transport is extremely limited and disperses rapidly with distance from the source. Under certain extreme meteorological conditions, however, CO concentrations near a congested roadway or intersection may reach unhealthy levels affecting sensitive receptors. Typically, high CO concentrations are associated with severely congested intersections operating at an unacceptable level of service (LOS) (LOS E or worse is unacceptable). Projects contributing to adverse traffic impacts may result in the formation of a CO hotspot. Additional analysis of CO hotspot impacts would be conducted if a project would result in a significant impact or contribute to an adverse traffic impact at a signalized intersection that would potentially subject sensitive receptors to CO hotspots.

Title 40 of the Code of Federal Regulations, Section 93.123(c)(5), Procedures for Determining Localized CO, PM_{10}, and $PM_{2.5}$ Concentrations (Hot-Spot Analysis), states that "CO, PM_{10}, and $PM_{2.5}$ hot-spot analyses are not required to consider construction-related activities, which cause temporary increases in emissions. Each site which is affected by construction-related activities shall be considered separately,

using established 'Guideline' methods. Temporary increases are defined as those which occur only during the construction phase and last five years or less at any individual site" (40 CFR 93.123). While project construction would involve on-road vehicle trips from trucks and workers during construction, construction activities would last approximately 12 months and would not require a project-level construction hotspot analysis.

For long-term operations, as provided in the Trip Generation and Vehicle Miles Travel (VMT) Screening Analysis (Revised July 21, 2025) prepared by Dudek, the project screened out of focused analysis for vehicle-miles traveled (VMT) and LOS because it would result in a minimal increase in on-road vehicles (i.e., less than 110 net new passenger trips and less than 50 trips during the peak hour), which supports that the project is not a large traffic generator. Based on these considerations, the proposed project would not generate traffic that would contribute to potential adverse traffic impacts that may result in the formation of CO hotspots. In addition, due to continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing. Overall, the project would result in a less-than-significant impact to air quality with regard to potential CO hotspots.

Toxic Air Contaminants

A substance is considered toxic if it has the potential to cause adverse health effects in humans, including increasing the risk of cancer upon exposure, or acute (immediate) and/or chronic (cumulative) non-cancer health effects. A toxic substance released into the air is considered a toxic air contaminant (TAC). Adverse health effects associated with exposure to TACs may include carcinogenic (i.e., cancer-causing) and noncarcinogenic effects. Noncarcinogenic effects typically affect one or more target organ systems and may be experienced on either short-term (acute) or long-term (chronic) exposure to a given TAC.

TACs are identified by federal and state agencies based on a review of available scientific evidence. In the state of California, TACs are identified through a two-step process that was established in 1983 under the Toxic Air Contaminant Identification and Control Act. This two-step process of risk identification and risk management and reduction was designed to protect residents from the health effects of toxic substances in the air. In addition, the California Air Toxics "Hot Spots" Information and Assessment Act, Assembly Bill (AB) 2588, was enacted by the legislature in 1987 to address public concern over the release of TACs into the atmosphere.

Examples include certain aromatic and chlorinated hydrocarbons, certain metals, and asbestos. TACs are generated by a number of sources, including stationary sources, such as dry cleaners, gas stations, combustion sources, and laboratories; mobile sources, such as automobiles; and area sources, such as landfills. Although CARB has identified more than 200 TACs, approximately 70% of all airborne cancer risk in California is associated with diesel particulate matter (DPM) (CARB 2000). DPM contributes to premature death; hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma; increased respiratory symptoms; and decreased lung function in children. Those most vulnerable to noncancer health effects are children, whose lungs are still developing, and the elderly, who often have chronic health problems (CARB 2024a).

Project construction would result in emissions of DPM from heavy construction equipment and trucks accessing the site. Diesel particulate is characterized as a TAC by the State of California. The Office of Environmental Health Hazard Assessment (OEHHA) has identified carcinogenic and chronic

noncarcinogenic effects from long-term exposure but has not identified health effects due to short-term exposure to diesel exhaust. According to the OEHHA, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period for the maximally exposed individual resident; however, such assessments should be limited to the period/duration of activities associated with the project (OEHHA 2015). Thus, the duration of the proposed construction activities would only constitute a small percentage of the total 30-year exposure period. Due to this relatively short period of exposure (12 months) and minimal localized particulate emissions on site (as identified in Table 3.3-4 above, which includes both DPM and dust), TACs generated by the project would not result in concentrations causing significant health risks. Furthermore, the closest sensitive receptor to the project (i.e., residence along South Lilac Avenue) is over 1,200 feet away from the project site. Overall, the project would not result in substantial TAC exposure to sensitive receptors in the vicinity of the project, and impacts would be less than significant.

Regarding long-term operations, the project would replace an existing warehouse/office use with two warehouses, which would result in a minimal increase in truck traffic on the local roadway network. In addition, as the project would not result in new stationary sources and sensitive receptors are not proximate to the project site, a formal health risk assessment would not be required for the project. Accordingly, the project would not result in emissions that would exceed the SCAQMD health risk thresholds.

Health Impacts of Criteria Air Pollutants

VOCs and NO_x are precursors to O_3, for which the SCAB is designated as nonattainment with respect to the NAAQS and CAAQS. The health effects associated with O_3 include respiratory symptoms, worsening of lung disease leading to premature death, and damage to lung tissue (CARB 2024b). The contribution of VOCs and NO_x to regional ambient O_3 concentrations is the result of complex photochemistry. The increases in O_3 concentrations in the SCAB due to O_3 precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O_3 concentrations would also depend on the time of year that the VOC and NO_x emissions would occur because exceedances of the O_3 CAAQS/NAAQS tend to occur between April and October when solar radiation is highest. The holistic effect of a single project's emissions of O_3 precursors is speculative due to the lack of quantitative methods to assess this impact. The project would not result in emissions of VOCs or NO_x that exceed SCAQMD significance threshold during construction or operations. Therefore, implementation of the project would contribute minimally to regional O_3 concentrations and the associated health effects.

Health effects associated with NO_x and NO_2 (which is a constituent of NO_x) include lung irritation and enhanced allergic responses (CARB 2024c). As depicted in Table 3.3-4, project construction and operation would not exceed the SCAQMD localized thresholds for NO_2. Thus, construction and operation of the project is not anticipated exceed the NO_2 standards or contribute to associated health effects.

Health effects associated with CO include chest pain in patients with heart disease, headache, light-headedness, and reduced mental alertness (CARB 2024d). CO tends to be a localized impact associated with congested intersections. CO hotspots were discussed previously as a less than significant impact. Thus, the project's CO emissions would not contribute to the health effects associated with this pollutant.

Health effects associated with particulate matter include premature death and hospitalization, primarily for worsening of respiratory disease (CARB 2024e). As depicted in Tables 3.3-2 through 3.3-4, construction

and operation of the project would not exceed regional or localized thresholds for PM_{10} or $PM_{2.5}$ and would not contribute to exceedances of the NAAQS or CAAQS for particulate matter. Due to the minimal contribution of particulate matter during construction and operation, the project is not anticipated to result in health effects associated with PM_{10} or $PM_{2.5}$.

There are numerous scientific and technological complexities associated with correlating criteria air pollutant emissions from an individual project to specific health effects or potential additional nonattainment days, and there are currently no modeling tools that can provide reliable and meaningful additional information regarding health effects from criteria air pollutants generated by individual projects within SCAQMD's jurisdiction. Currently, SCAQMD, CARB, and EPA have not approved a quantitative method to reliably, meaningfully, and consistently translate the mass emission estimates for the criteria air pollutants resulting from the project to specific health effects. However, based on the project's minimal overall construction and operational criteria air pollutant emissions described above, health impacts from project-related criteria air pollutant emissions would be less than significant.

Valley Fever

Coccidioidomycosis, more commonly known as "Valley Fever," is an infection caused by inhalation of the spores of the *Coccidioides immitis* fungus, which grows in the soils of the southwestern United States. California Labor Code section 6709 defines "highly endemic" areas for Valley Fever as those areas where the annual incidence rate is greater than 20 cases per 100,000 persons per year. San Bernardino County is not considered a highly endemic region for Valley Fever, as the latest report from the California Department of Public Health (CDPH) indicated the County has 10.5 cases per 100,000 people (CDPH 2023). Even if present at the site, construction activities may not result in increased incidence of valley fever. Propagation of valley fever is dependent on climatic conditions, with the potential for growth and surface exposure highest following early seasonal rains and long dry spells. Valley Fever spores can be released when filaments are disturbed by earth-moving activities, although receptors must be exposed to and inhale the spores to be at increased risk of developing valley fever. Moreover, exposure to valley fever does not guarantee that an individual will become ill—approximately 60% of people exposed to the fungal spores are asymptomatic and show no signs of an infection (USGS 2000).

In order to reduce fugitive dust from the project and minimize adverse air quality impacts, the project would employ dust control measures in accordance with SCAQMD Rules 401 and 403, which limit the amount of fugitive dust generated during construction. These requirements are consistent with CDPH recommendations for the implementation of dust control measures, including regular application of water during soil-disturbance activities, to reduce exposure to Valley Fever by minimizing the potential that the fungal spores become airborne (CDPH 2013). Further, regulations designed to minimize exposure to valley fever hazards are included in Title 8 of the California Code of Regulations and would be complied with during the project's construction phase (California Department of Industrial Relations 2017).

In summary, the project would not result in a significant impact attributable to Valley Fever exposure based on its geographic location and compliance with applicable regulatory standards and dust control measures, which will serve to minimize the release of and exposure to fungal spores. Therefore, impacts associated with Valley Fever exposure for sensitive receptors would be less than significant.

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less-Than-Significant Impact. The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

Odors would be potentially generated from vehicles and equipment exhaust emissions during construction of the project. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment and asphalt pavement application. Such odors would disperse rapidly from the project site and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction would be less than significant.

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities (SCAQMD 1993). The project would replace an existing warehouse with a new warehouse facility and would not create any new sources of odor during operation. Therefore, project operations would result in an odor impact that is less than significant.

3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	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 or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

The following analysis is based on a biological resources assessment which includes field assessments as well as a literature review of the latest available relevant reports, maps, soil data, data on biological baselines, special-status habitats, and species distributions to determine those resources that have the potential to occur within the project site and surrounding 100-foot buffer (study area). Attachments referenced herein are included within Appendix B. These attachments include a list of special-status biological resources recorded in the region (Appendix B-1), photos taken of the project site during a biological reconnaissance (Appendix B-2), a list of biological resources recorded within the study area (Appendix B-3), and potential to occur determinations for special-status plants and wildlife recorded in the region (Appendix B-4, B-5).

A field assessment was conducted on February 9, 2022, and updated on November 14, 2025, to characterize the environmental conditions, vegetation communities/land covers, and any common or special-status plants or wildlife (including their habitats) that could be impacted during project implementation. The field assessments were conducted during weather conditions that were favorable for the detection of wildlife (i.e. no fog, high winds, rain). During the field survey, vegetation communities and land covers were catalogued and confirmed based on existing site conditions. Vegetation communities were mapped according to the California Department of Fish and Wildlife (CDFW) *List of Vegetation Alliances and Associations* (or Natural Communities List) which is based on *A Manual of California Vegetation, Second Edition* (Sawyer et al. 2009). Dudek compiled a general inventory of plant and wildlife species detected by sight, calls, tracks, scat, or other field indicators, and determined the potential for special-status species to occur within the study area. Additionally, Dudek conducted a preliminary investigation of the extent and distribution of jurisdictional waters of the United States regulated by the U.S. Army Corps of Engineers (USACE), jurisdictional waters of the state regulated by the Regional Water Quality Control Board (RWQCB), and CDFW jurisdictional streambed and associated riparian habitat.

Dudek queried the CDFW's California Natural Diversity Database (CNDDB; CDFW 2025), and the California Native Plant Society's Inventory of Rare and Endangered Plants (CNPS; CNPS 2025) to identify special-status biological resources from the region (Appendix B-1). The CNDDB and CNPS were searched based on the U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle for San Bernardino South, where the study area is located, as well as the surrounding

eight quadrangles (Redlands, Sunnymead, Riverside East, Riverside West, Fontana, Devore, San Bernardino North, and Harrison Mountain). Potential and/or historic drainages and aquatic features were investigated based on a review of USGS topographic maps (1:24,000 scale), aerial photographs, the National Wetland Inventory database (NWI; USFWS 2025), and the United States Department of Agriculture (USDA) Natural Resource Conservation Service Web Soil Survey (USDA 2025).

The study area is depicted on Section 23, Township 1 South, Range 5 West of the San Bernardino South topographic quadrangle map. The study ranges between 1,050 to 1,070 feet Above Mean Sea Level AMSL), and consists of predominantly disturbed and developed land, devoid of native vegetation communities. Exposed soils within the study area appear regularly tilled, and support approximately 30% cover of very coarse pebble to small cobble rock aggregate. While several small animal burrows were detected within the survey area during the 2022 biological reconnaissance, there were none observed during the updated 2025 field reconnaissance, indicating prior burrows were filled. Ground squirrels were detected within the study area during the 2025 biological reconnaissance and several shallow, attempted burrows were observed; however, the amount of pebbly/cobbly rocky aggregate within the exposed soils in the disturbed habitat likely hinders burrow formation, and the depths and widths of the attempted burrows were not sufficient to support animal activity. While there is scattered ruderal vegetation and surrounding ornamental vegetation to support special-status species in the study area, the study area is surrounded by mixed commercial development and public rights-of-way, resulting in isolated/fragmented habitat. Soils within the study area consist of Tujunga gravelly loamy sand, 0% to 9% slopes. However, observed surface soils have been compacted and altered from their natural composition via urban development as well as repeated tilling to no longer support natural habitat.

Three vegetation communities and/or land covers were mapped within the study area during the biological reconnaissance (Figure 3.4-1, Biological Resources). Specifically, the study area consists of urban/developed land, disturbed habitat, and ornamental plantings (Sawyer et al. 2009). A total of 28 plant species (7 native and 21 non-native), were recorded within the study area (Appendix B-3, Species Compendium).

The northernmost portion of the study area is characterized by disturbed habitat consisting of ruderal vegetation, exposed soils, and bare tilled soils intermixed with rock aggregate. Scattered, non-native ruderal vegetation observed within the disturbed habitat within the study area is composed grasses, forbs, and mustards. A fenced monopine telecommunications tower facility adjacent to the northern edge of the project site boundary contained an active red-tailed hawk (*Buteo jamaicensis*) nest in 2022; the nest was no longer present during the 2025 field visit. No nesting activity was detected in the study area during the 2025 field visit.

No special-status plant species or vegetation communities that are considered rare or sensitive by the California Environmental Quality Act (CEQA; e.g., riparian vegetation) were observed within the study area. Portions of the disturbed habitat within the study area support native ruderal plant species, specifically *Amsinckia sp., Ambrosia sp*., common sunflower (*Helianthus annus*) and telegraphweed (*Heterotheca grandiflora*). Additionally, the historic ranges of several rare plant species cross over the project site (CDFW 2025); these species require native vegetation communities, and as such, the study area does not have the potential to support special-status plants covered under CEQA or considered rare by California Native Plant Society (CNPS). Rare plants that are tolerant to disturbance may occur on site that were not observed during the 2022 and 2025 biological reconnaissance due to seasonal survey restrictions (completed outside of the spring and summer blooming period); however, repeated tilling within the study area and dominance of rock aggregate have altered natural soil quality, and the overlapping historic rare plant occurrence records are from before 1970 or considered extirpated due to development (CDFW 2025).

Ornamental plantings occur along the southwestern and southern periphery of the project site boundary, surrounding the developed land on site and the surrounding study area buffer. Frequently maintained grass, trimmed privacy hedges, and blue spires (*Salvia transsylvanica*) are planted with an overstory of western sycamore (*Platanus racemosa*), Washington fan palm (*Washingtonia robusta*), and pine (*Pinus sp.*) throughout this vegetation community. Although western sycamore is a native tree known to occur in riparian communities, those within the study area have been planted in evenly spaced rows to function as ornamental vegetation.

Developed lands within the study area are characterized by impermeable surfaces including commercial development associated with a self-storage facility, ancillary structures, asphalt-paved parking areas and drives. The southern portion of the project site is developed with a vacant building. Representative photographs of the project site are included in Appendix B-2.

Wildlife species diversity during the 2022 and 2025 field assessments was low and is likely impacted by the amount of surrounding development, existing disturbances from commercial activities, and lack of native habitat within the study area. A total of 11 wildlife species (9 native and 2 non-native) were recorded in the study area, consisting of nine birds, one mammal, and one reptile (Appendix B-3). Species observed include the American Crow (*Corvus brachyrhynchos*), red-tailed hawk (*Buteo jamaicensis*), western gull (*Larus occidentalis*), killdeer (*Charadrius vociferus*), black phoebe (*Sayornis nigricans*), mourning dove (*Zenaida macroura*), house finch (*Haemorhous mexicanus*), house sparrow (*Passer domesticus*), European starling (*Sturnus vulgaris*), California ground squirrel (*Otospermophilus beecheyi*), and western fence lizard (*Squamata occidentalis*). No amphibian or aquatic species were observed within the study area. No special-status wildlife were detected during the 2022 and 2025 biological field assessments.

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Less-Than-Significant Impact with Mitigation Incorporated. Based on the database queries of the CNDDB and CNPS, there are 72 special-status plants and 67 special-status wildlife with recorded occurrences in the San Bernardino South, California USGS 7.5-minute topographic quadrangle, and surrounding eight quadrangles (Appendix B-1). The project site occurs within a partially developed area and contains disturbed habitat intermixed with ruderal vegetation. Ornamental plantings along the southern and southwestern portions of the project site boundary have the ability to potentially support special-status avian nesting species. Additionally, while the monopine communication tower facility adjacent to the northeast edge of the project site no longer supports an active red-tailed hawk nest in 2025, as it previously did support an active nest in 2022, there is still potential for nesting activity to occur. No natural communities, hydric soils, or natural hydrology occur on the project site due to previous and ongoing disturbances.

Of the 72 special-status plants, based on range, elevation, and associated vegetation and soils, 19 of these species have a low potential to occur due to historical occurrence records within 5 miles of the study area (CDFW 2025). The remaining 53 species are not expected to occur on the study area. A complete list of the 72 special-status plant species, with their listing statuses, habitat requirements, elevation ranges, blooming periods, and potential to occur determinations, are included in Appendix B-4. Special-status plant species with a low potential to occur or are not expected to occur have not been evaluated further, as the 19 species with historical occurrences within 5 miles of the project site do not tolerate disturbed areas,

and there are no undisturbed or native habitats within the study area. As such, potential impacts to special-status plant species are not significant.

Of the 68 special-status wildlife species analyzed for their potential to occur within the study area, based on range, habitat, and surrounding conditions, 4 were determined to have a low potential to occur within the study area: burrowing owl (*Athene cunicularia*) (State Candidate for listing as endangered, CDFW SSC), loggerhead shrike (*Lanius ludovicianus*) (nesting) (CDFW SSC), San Diego black-tailed jackrabbit (*Lepus californicus bennetti*) (CDFW S3/S4), and Crotch's bumble bee (*Bombus crotchii*) (State Candidate for listing as endangered). The limited amount of ornamental vegetation and predominantly disturbed habitat with regularly tilled soils provides low-quality but potentially suitable habitat for these 4 special-status wildlife species, in addition to known occurrence records within 5 miles of the project (CDFW 2025). A complete list of the 68 special-status wildlife species, with their listing status, habitat requirements, and potential to occur determinations, is included in Appendix B-5. The remaining 64 species have no potential to occur on the study area due to lack of suitable habitat. Additionally, the study area is surrounded by commercial development and public rights-of-way, further reducing the potential for special-status wildlife to occur or move onto the study area from native habitat areas off site. Lastly, the lack of connection to other sensitive biological resources such as natural drainages or waterways and large habitat blocks also reduces the potential for any special-status wildlife species to occur within the study area.

San Diego black-tailed jackrabbit and loggerhead shrike are SDFW S3:Vulnerable and Species of Special Concern, respectively. Neither species was observed during the biological surveys conducted during 2022 and 2025. However, due to the presence of low-quality yet suitable habitat, the potential for these species to move into the project site in the future cannot be entirely ruled out. Therefore, if a population of loggerhead shrike or San Diego black-tailed jackrabbit is found on the project site prior to the start of construction, the project could result in a significant direct impact to these species. Mitigation measure **MM-BIO-1: Pre-Construction Survey for Special-Status Wildlife** shall be implemented prior to the start of construction to reduce impacts to special-status wildlife to a less than significant level.

As State candidate listed species, the potential for burrowing owl and Crotch's bumble bee to occur on the project site are discussed in further detail below.

Burrowing Owl

There is a low potential for burrowing owl to occur due to the lack of suitable burrows detected within the disturbed habitat during the 2025 survey compared to the 2022 survey. Scattered semi-collapsed burrows present in 2025 are likely the result of ground squirrel activity and 2022 burrows have since been filled or tilled over. The scattered burrows observed in the disturbed habitat on the project site during the 2025 field assessment lack the depth and width to support burrowing owl occupancy. Additionally, the study area is surrounded by commercial development and public rights-of-way, further reducing the potential for special-status wildlife to occur or move onto the study area from native habitat areas off site. As such, no protocol-level burrowing owl surveys were conducted.

While burrowing owl has a low potential to occur, due to the presence of small mammal burrows during the 2022 field assessment and presence of ground squirrels in the 2025 field assessment, burrowing owl could eventually occupy the project site prior to construction if ground squirrels do successfully establish burrows. To reduce potentially significant impacts to burrowing owl to a less than significant level, the following biological mitigation measures (**MM BIO-2: Focused Burrowing Owl Survey; MM BIO-3: Pre-**

Construction Burrowing Owl Surveys and Avoidance; and **MM BIO-5: Monitoring Biologist and Worker Environmental Awareness Program)** shall be implemented.

Crotch's Bumble Bee

There is low potential for Crotch's bumble bee to occur based on scattered native herbaceous floral resources in the *Asteraceae* family (telegraphweed, common sunflower) present in the disturbed habitat on the project site that are capable of supporting foraging habitat for this species. However, no nesting habitat for Crotch's bumble bee (i.e. rock piles, brush piles, dead logs, dead trees, leaf litter) was observed during the 2025 biological reconnaissance. Additionally, no bumble bee species were detected during the 2022 and 2025 biological reconnaissance. However, as there are historic occurrence records from 1938 within 1 mile of the project site (CDFW 2025), and limited suitable foraging habitat is present, the project has the potential to significantly impact Crotch's bumble bee absent mitigation. With implementation of **MM BIO-4: Pre-Construction Survey for Crotch's Bumble Bee**, potentially adverse impacts to Crotch's bumble bee would be reduced to a **less than significant** level.

MM BIO-1: Pre-Construction Survey for Special-Status Wildlife. One pre-construction clearance survey for southern California legless lizard, California glossy snake, merlin, loggerhead shrike, San Diego black-tailed jackrabbit, and pocketed free-tailed bat shall be conducted no more than 14 days prior to initiation of site preparation and grading activities. A qualified biologist shall walk the entire project site to determine if the above species are observed or detected. Acoustic detection for bats may be used in conjunction with visual observation of individuals and sign to determine presence/absence of occupied roosts or foraging behavior. If any of the above species is observed or detected during the pre-construction survey, additional measures may be required, such as establishing a buffer around known locations and/or conducting monitoring during construction near occupied areas to move observed individuals out of harm's way. For pocketed free-tailed bat, if a roost is found and may be impacted during construction, additional measures, such as a focused bat survey, replacement roost installation, and/or agency consultation, may be required.

MM BIO-2: Focused Burrowing Owl Surveys. CDFW protocol focused surveys for burrowing owl shall be conducted by one Dudek biologist on the disturbed habitat within the project site according to the protocol outlined in the CDFG *Staff Report on Burrowing Owl Mitigation* (CDFG 2012). Breeding season surveys (February through August) will be conducted in order to positively determine burrowing owl presence or absence prior to the start of construction. Four (4) survey visits will be conducted on the study area, spaced apart to allow an adequate amount of time to detect burrowing owl throughout the breeding season. At least one survey will be conducted between February 15 and April 15, and a minimum of three surveys conducted at least three weeks apart between April 15 and July 15, with at least one visit after June 15.

Dudek's biologist will walk straight line transects spaced approximately 50-feet apart across the entire project site and a 500-foot buffer (study area). The entire visible areas on the study area will be scanned with the use of binoculars to search for presence of burrowing owl including individual owl(s), pellets, prey remains, whitewash, and/or suitable active burrows. The surveys will not be conducted during periods of inclement weather with winds over 12 miles per hour, rain, and/or dense fog. Surveys will also be conducted

between sunrise and 10:00 a.m. Any suitable burrows or individual owls observed will be mapped with a hand-held GPS unit and marked on a field map. Special attention will be paid to the disturbed habitat within the project site that supports small mammal burrows.

If owls are found nesting on the study area, a suitable buffer will be established around the active nest and this area should be avoided, and a Burrowing Owl Protection and Relocation Plan shall be drafted to ensure protection of the species. Additional avoidance/mitigation measures will be provided in the Burrowing Owl Protection and Relocation Plan to protect the owls from potential take related to project activities including but not limited to appropriate avoidance buffers, passive and/or active relocation methodology, construction biomonitoring, and reporting requirements. The Burrowing Owl Protection and Relocation Plan shall be reviewed and approved within 30 days of receipt by CDFW. If the species is not detected, then no further action is required.

MM BIO-3: Pre-Construction Burrowing Owl Surveys and Avoidance. A burrowing owl pre-construction survey will be required in compliance with Staff Report on Burrowing Owl Mitigation, State of California Natural Resource Agency, Department of Fish and Game, May 7, 2012 (CDFG 2012). To avoid potential direct impacts to burrowing owl, a burrowing owl pre-construction survey shall be conducted by a qualified biologist no more than 30 days prior to ground-disturbing project activities. The pre-construction survey will reevaluate the locations of burrowing owl burrows located within the study area so take of owls or active owl nests can be avoided. The survey would include 100% coverage of the development area and within suitable habitat areas, within 500 feet of the project limits.

If active burrowing owl burrows are determined to be present, they would be flagged, and a 160-foot buffer would be created around the burrow during the nonbreeding season (September 1 to January 30). A 250-foot buffer would be created during the breeding season (February 1 to August 31) (Environmental Planning Group 2020, Dudek 2024). Conversely, a default 300-foot buffer can be created around active burrows (Environmental Resource Group 2020). These buffers may be adjusted by a qualified biologist to address site-specific conditions. If possible, avoid disturbing occupied burrows during the nesting period. Any mitigation methods, including translocation, mitigation monitoring and reporting, must be coordinated with CDFW. If burrowing owl are determined to be present, **MM BIO-5: Biological Monitoring and Worker Environmental Awareness Program** shall be implemented.

MM BIO-4: Pre-Construction Survey for Crotch's Bumble Bee. A pre-construction survey for Crotch's bumble bee shall be conducted within the construction footprint prior to the start of ground-disturbing construction activities occurring during the Colony Active Period (April 1 through August 31 for Crotch's bumble bee). If ground-disturbing activities occur outside the period, no further mitigation would be required. The survey shall ensure that no nests for Crotch's bumble bee are located within the construction area.

The focused survey shall be performed by a biologist with expertise in surveying for bumble bees. Surveys may occur between 1 hour after sunrise and 2 hours before sunset. Surveys shall not be conducted during wet conditions (e.g., foggy, raining, or drizzling) and surveyors shall wait at least 1 hour following rain. Optimal surveys are when there are sunny to partly

sunny skies and a temperature greater than 60°F. Surveys may be conducted earlier if other bees or butterflies are flying. Surveys shall not be conducted when it is windy (i.e., sustained winds greater than 8 mph). Within non-developed habitats, the biologist shall look for nest resources suitable for bumble bee use. Ensuring that all nest resources receive 100% visual coverage, the biologist shall watch the potential nest resources for up to 5 minutes, looking for exiting or entering worker bumble bees. It is up to the discretion of the biologist regarding the actual survey viewshed limits from the chosen vantage point, but this limit shall not exceed 50 feet. The biologist will reduce the 50-foot limit as necessary to ensure 100% visual coverage of potential burrow resources depending on topography, vegetation height and cover, and other factors. This approach should allow the biologist to assess multiple burrows at one time to sufficiently determine if bees are entering/exiting them. If a nest is suspected, the surveyor can block the entrance of the possible nest with a sterile vial or jar until nest activity is confirmed (no longer than 30 minutes). A photo voucher of the bee species shall be collected, and the location mapped. If required, any capture of bumble bees will be conducted by a biologist with a valid CESA Memorandum of Understanding (MOU) and Scientific Collecting Permit (SCP) for Crotch's bumble bee. If a bumble bee worker is detected, then a representative shall be identified to species.

If Crotch's bumble bee nests are not detected, no further mitigation would be required.

If a Crotch's bumble bee nest is detected, the project biologist will establish, monitor, and maintain a no-work buffer around the nest. The size and configuration of the no-work buffer will be based on best professional judgement of the project biologist in consultation with CDFW. The buffer will provide at least 50 feet of clearance around the nest entrance(s). Construction activities will not occur within the no-work buffer until the colony is no longer active. To determine that a nest is no longer active, the nest will be observed for a minimum of 60 minutes each day across a minimum of 3 days during suitable flight weather (i.e., ambient air temperature between 60- and 90-degrees Fahrenheit, winds under 10 mph, and no precipitation more than a drizzling rain). If no bees are seen flying in or out of the nest by the end of the observation period, it will be determined that the nest is no longer active. If project activities occur outside of the Colony Active Period, then pre-construction surveys for active bee nests and avoidance measures are not required.

A written survey report shall be submitted to the City within 30 days of the pre-construction survey. The report shall include survey methods, weather conditions, and survey results, including a list of insect species observed and a figure showing the locations of any Crotch's bumble bee nest sites or individuals observed. The survey report shall include the qualifications/resumes of the surveyor(s) and approved biologist(s) for identification of photo vouchers and a detailed habitat assessment. If Crotch bumble bee nests are observed, the survey report shall also include recommendations for avoidance, and the location information shall be submitted to the California Natural Diversity Database at the time of, or prior to, submittal of the survey report.

If the above measures are followed, it is assumed that the Project shall not need to obtain authorization from CDFW through the CESA Incidental Take Permit process. If the nest resources cannot be avoided, as outlined in this measure, the project applicant shall

consult with CDFW regarding the need to obtain an Incidental Take Permit. Any measures determined to be necessary through the Incidental Take Permit process to offset impacts to Crotch's bumble bee may supersede measures provided in this CEQA document and shall be incorporated into the habitat mitigation and monitoring plan.

In the event an Incidental Take Permit is needed, mitigation for direct impacts to Crotch's bumble bee shall be fulfilled through compensatory mitigation at a minimum 1:1 nesting habitat replacement of equal or better functions and values to those impacted by the Project, or as otherwise determined through the Incidental Take Permit process. Mitigation shall be accomplished either through off-site conservation or through a CDFW-approved mitigation bank. If mitigation is not purchased through a mitigation bank, and lands are conserved separately, a cost estimate shall be prepared to estimate the initial start-up costs and ongoing annual costs of management activities for the management of the conservation easement area(s) in perpetuity. The funding source shall be in the form of an endowment to help the qualified natural lands management entity that is ultimately selected to hold the conservation easement(s). The endowment amount shall be established following the completion of a Project-specific Property Analysis Record to calculate the costs of in-perpetuity land management. The Property Analysis Record shall take into account all management activities required in the Incidental Take Permit to fulfill the requirements of the conservation easement(s), which are currently in review and development.

MM BIO-5: Biological Monitoring and Worker Environmental Awareness Program. A biological monitor shall be present during all ground-disturbing construction activities to ensure that burrowing owls are not impacted by the project and to administer passive relocation of owls, if required. Of burrowing owls are observed, the biological monitor shall have the authority to halt construction activities to avoid damaging sensitive resources or violating applicable laws. The biological monitor shall conduct an initial training for all construction workers on the biological resources that require protection during construction activities (Crotch's bumble bee, burrowing owl) as well as the measures that must be implemented to protect those resources. The biological monitor shall maintain a list of personnel that have received the training and any new personnel shall receive the training prior to commencing construction activities

In summary, the project would not result in impacts to any special-status plant species but has the potential to result in impacts to four special-status wildlife species. With implementation of **MM BIO-1**, **MM BIO-2, MM BIO-3**, **MM BIO-4**, and **MM BIO-5**, impacts to special-status wildlife species would be **less than significant with mitigation incorporated**.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact. The project site occurs in a partially developed area with disturbed habitat and ornamental vegetation that lacks any natural vegetation, drainages or watercourses capable of supporting riparian habitat. There are no channelized drainages or tributaries within the study area. Additionally, no blue line streams are mapped on USGS topographic maps or the USFWS NWI for the study area. Further, due to the

lack of natural wetland characteristics such as hydrophytic vegetation, hydric soils, and standing water on the project site, no sensitive riparian community was observed or has the potential to occur within the project site.

The habitat within the project site is partially developed with ornamental plantings and disturbed habitat, and there are no sensitive vegetation communities within the study area. Planted western sycamore trees that are present within the ornamental vegetation on the southwestern and southern portions of the project boundary do not function as riparian habitat due lack of hydrologic connection and presence in the overstory of maintained grasses and ornamental hedges that surround urban development. Therefore, the project will result in **no impact** to riparian habitat or sensitive natural communities.

c) ***Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

Less-Than-Significant Impact. The project site does not contain any wetland parameters, natural or man-made drainages, waterways, or connectivity to any potentially regulated water. The project site is partially developed land with ornamental vegetation and disturbed habitat. The observed surface soils within the project site have been previously graded, tilled, and disced from their natural composition, and therefore no longer support natural wetland characteristics. Although a concrete drainage channel runs adjacent to the eastern portion of the project site, this man-made feature does not support natural wetland characteristics (hydric soils, hydrophytic vegetation) and will not be directly impacted by project activities due to existing artificial barriers (chain link fencing).

Section 3.10, Hydrology and Water Quality, details the Best Management Practices (BMPs) which the project would adhere to during all construction-related activities to prevent indirect impacts caused by ground-disturbing activities (i.e., sediment runoff or soil erosion). Indirect impacts would be limited to short-term construction impacts related to erosion, runoff, and dust.

The USDA Natural Resources Conservation Service (NRCS) depicts gravelly loamy sand soils mapped within the project site, and the study area lacks suitable natural hydrologic conditions and flood capacity to support wetlands or any other jurisdictional feature. No mapped wetland features were located within the study area. As such, no wetlands occur or are expected to occur on the study area. Therefore, provided the BMPs are implemented, the project would result in **a less than significant impact** to state and federally protected waters and wetlands.

d) ***Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?***

Less-Than-Significant Impact with Mitigation Incorporated. The project site occurs within a partially developed property surrounded by mixed commercial development. The project site does not occur within any designated wildlife corridors or habitat linkages, nor does it provide opportunities for wildlife movement through the project site to larger habitat blocks. The limited ornamental vegetation within the study area provides opportunities for small mammals, and particularly avian species, to move through the area. However, chain-link fencing and existing surrounding development act as habitat barriers that prevent wildlife species from dispersing across the study area into other habitats. Additionally, the project site does

not function as a wildlife corridor or linkage due to lack of native habitat; as a result, construction of the project would result in no impact or impediment to wildlife movement through the region.

However, the ornamental vegetation bordering the southern and southwestern portions of the project site has the potential to support nesting birds. In addition, disturbed habitat on the project site supports ruderal vegetation that could provide foraging and nesting habitat for ground-nesting birds. Further, a fenced monopine telecommunications tower facility adjacent to the northern edge of the project site boundary supported an active red-tailed hawk (*Buteo jamaicensis*) nest in 2022; the nest was absent in 2025, but there is still potential for the monopine tower to be used as a nesting site in subsequent years.

Therefore, construction activities that commence during the avian breeding season of February through August may result in a potentially significant impact to avian species protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game (CFG) Code. In order to reduce potential impacts to a less than significant level, the project shall implement **MM BIO-6: Nesting Bird Avoidance** to comply with the MBTA and CFG Code.

MM BIO-6: Nesting Bird Avoidance. Pursuant to the Migratory Bird Treaty Act (MBTA), the project should avoid the avian nesting season (March 15 – September 15) in order to reduce any potential impact to protected birds and their nests. In the event the project must commence during the nesting season, a pre-construction clearance survey should be conducted within 3 days prior to ground-disturbing activities to determine the presence/absence of nesting birds. If an active nest is found a biologist will establish a buffer around the nest until the nestlings have fledged and the nest is no longer active. The buffer will be established by a biologist based on the sensitivity of the species to disturbance and proximity to project activities. Construction activities may continue outside of the buffer under the discretion of a monitoring biologist. The monitoring biologist shall remain onsite to monitor an active nest buffer until the nest has fledged. Once the biologist has determined the nest is no longer active, the buffer can be removed, and construction may continue.

With implementation of **MM-BIO-5: Nesting Bird Avoidance**, potential indirect impacts to nesting birds would be **less than significant with mitigation incorporated**.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less than Significant Impact with Mitigation Incorporated. The project site occurs within the City of Rialto (City) in San Bernardino County, California. Environmental review for the proposed project will comply with the provisions described within Chapter 18.70 of the City of Rialto Municipal Code of Ordinances. The project is subject to the requirements of the Rialto General Plan. The City's General Plan Land Use Element Update contains the following policies to protect biological resources (City of Rialto 2023a).

Goal 2-40: Conserve and enhance Rialto's biological resources.

Policy 2-40.1: Protect endangered, threatened, rare, and other special-status habitat and wildlife species within and along Lytle Creek by working with the USFWS and the CDFW to establish Natural Community Conservation Plans, Habitat Conservation Plans (HCP), or other established biological resource protection mechanisms within this sensitive area.

Policy 2-40.2: Pursue open space, wildlife corridors, or conservation easements to protect sensitive species and their habitats.

Policy 2-40.3: Continue to work with the USFWS to adopt a habitat conservation plan to protect viability of the Delhi Sands flower-loving fly. Until a habitat conservation plan is established, continue to support the implementation of the existing Delhi Sands Flower-loving Fly Recovery Plan.

The project site is not near Lytle Creek; lacks native sensitive vegetation communities; is surrounded by development and does not function as a wildlife corridor; and lacks Delhi sands capable of supporting Delhi Sands flower loving fly.

While no specific tree preservation ordinance exists for the City of Rialto, healthy trees are not approved for removal unless they meet the specific tree removal and tree maintenance criteria outlined below (City of Rialto 2025a):

1. Trees that are dead or in significant and irreversible decline. Significant decline is defined as dead limbs composing more than one-third (1/3) of the tree crown.
2. Trees that have a potentially hazardous and uncorrectable structure.
3. Trees that are stunted or malformed due to crowding from adjacent trees or structures.
4. Trees that have an insect or disease infestation that is not treatable and could cause tree mortality.
5. Trees that are causing damage to structures as follows:
   - Sidewalks, curbs, drives, buildings, and other structures: Removal shall be granted if the cost to repair the damage exceeds the appraised value of the tree (using the appraisal method established by the International Society of Arboricultural), if the process of repair will compromise the health and safety of the tree, or if the tree is determined to be incompatible with the growing space available.
   - Sewer, gas, electrical, water and other utilities: Removal shall be granted if it can be determined that the tree caused the damage to the utility. If the center of the tree trunk is located within five feet of a utility line, it is assumed to have caused the damage. It will be the applicant's responsibility to demonstrate cause if the tree is beyond five feet beyond the utility line.
6. Trees that have yet to cause damage to structures, but are determined to be incompatible with the growing space available.
7. Trees that are significantly inhibiting the utilization of the property and removal can be determined to provide a public benefit.

Ornamental trees within the project site shall be removed as part of the landscape plan. The project shall comply with the tree removal and maintenance criteria set forth by the City of Rialto (City of Rialto 2025a) during tree removal. In addition, with implementation of **MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, MM BIO-5, and MM BIO-6** to comply with Goal 2-40, the project shall comply with the goals and policies outlined in the City's General Plan Land Use Element Update (City of Rialto 2023a). Therefore, the project would result in **less than significant impact with mitigation incorporated** with regard to local policies or ordinances.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The study area does not occur within the boundaries of a designated multispecies habitat conservation plan or natural community conservation plan (MSCHP/NCCP). The project site is not mapped within any conservation areas, linkages, or habitat reserves. Therefore, the construction of the proposed project would result in **no impact** with regard to any adopted or approved conservation plan.

3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

No Impact. As part of preparing the Cultural Resources Report (Appendix C) for the project, a records search was conducted to identify previously documented historic resources. This search of existing records held by the South Central Coastal Information Center (SCCIC), part of the California Historical Resources Information System (CHRIS) included the project area and a radius of 1 mile around it. Additional consulted sources included historical maps and aerials of the project site.

As defined by the CEQA Guidelines (14 CCR 15000 et seq.), a "historical resource" is considered to be a resource if it is listed in or eligible for listing in the NRHP or CRHR, has been identified as significant in a historical resource survey, or is listed on a local register of historical resources.

The criteria for listing resources in the CRHR were developed in accordance with previously established criteria developed for listing in the NRHP. Thus, the following criteria are expressed in accordance with the NRHP criteria. According to PRC Section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains "substantial integrity," and (ii) meets at least one of the following criteria:

1. Is associated with events that have made a significant contribution to the broad pattern of our history
2. Is associated with the lives of persons important in our past
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values
4. Has yielded, or may be likely to yield, information important in prehistory or history

Review of the results of the SCCIC records search and historical imagery indicated that the project site does not contain any nor has it contained any known historical properties as defined by CEQA. Further, the subject property is not located within a historic district, nor is it a contributor to a potential district of similar properties, which individually may lack significance (Appendix C); therefore, no impact associated with historical resources would occur.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less-Than-Significant Impact with Mitigation Incorporated. The SCCIC records indicated that 25 previous technical investigations for cultural resources were conducted within 1 mile of the project site between 1984 and 2015. SCCIC records that no previously recorded cultural resources are within or in direct proximity to the project site (Appendix C).

Although the archaeological sensitivity of the project site is considered low, it is always possible that intact archaeological deposits could be present at subsurface levels. For this reason, the project site should be treated as potentially sensitive for archaeological resources. Therefore, mitigation measures **(MM) CUL-1** through **MM-CUL-5** would be implemented to reduce potential impacts to unanticipated to archaeological resources pursuant to Section 15064.5. Therefore, impacts associated with archeological resources would be less than significant with mitigation incorporated.

MM-CUL-1**:** Project Archaeologist. Prior to issuance of any permit for ground-disturbing activities, the Project Applicant shall provide evidence to the City of Rialto (City) that a qualified professional archaeologist meeting Secretary of the Interior professional qualifications (Project Archaeologist) has been retained

MM-CUL-2: Cultural Resources Management Plan. Prior to any ground-disturbing activities the Project Archaeologist shall develop a Cultural Resource Management Plan (CRMP) to address the details, timing, and responsibilities of all archaeological and cultural resource activities that occur on the project site. The CRMP shall be written in consultation with the Consulting Tribes and shall include the following: approved Mitigation Measures (MM)/Conditions of Approval (COA), contact information for all pertinent parties, parties.

MM-CUL-3: Cultural Resources Sensitivity Training. A Cultural Resources Training shall be provided to all construction managers and construction personnel prior to commencing any ground disturbance work within the project area. The training shall be prepared and conducted or overseen by the Project Archaeologist. The training content shall include, but is not limited to, information about any known cultural resources in Project area and vicinity and the process for inadvertent discovery. The training may be discontinued when ground disturbance is completed. Construction personnel shall not be permitted to operate equipment within the construction area unless they have attended the training. The Qualified Archeologist or designated Archaeological Monitor and Monitoring Tribes' designated representatives shall attend the pre-grade meeting with the grading contractors to conduct the initial training and explain and coordinate the requirements of the Cultural Resource Management Plan.

MM-CUL-4:Archaeological Monitoring. The Project Archaeologist shall monitor or supervise archaeological monitors (Monitors) for initial ground disturbing activities. After initial grading, should no cultural resources be present and/or subsurface soils indicate a low likelihood for significant intact resources, the Project Archaeologist shall have the ability to recommend archaeological monitoring be decreased or eliminated after initial ground disturbing activities are complete, which shall be approved in writing by the City. Any such recommendation shall be specific to archaeological monitoring and not impact the implementation of **Mitigation Measures TCR-1 and/or TCR-2**.

MM-CUL-5: Inadvertent Discovery of Cultural Resources. In the event that cultural resources are discovered during Project implementation, all earthwork and ground-disturbing activities shall halt within a 60-foot buffer of the discovery as established by the Project Archaeologist, and the Project Archaeologist shall assess the nature and significance of the find. The Project Archaeologist shall coordinate with the City and identify whether the resource is potentially significant and if it requires further evaluation. Work on the other portions of the project site outside of the buffered area may continue during this assessment period. If the cultural resources are Native American in origin, the Consulting Tribes must be immediately contacted and consulted regarding potential significance and treatment of the resource. Specifically, the Consulting Tribes shall be contacted, as detailed within **MM-TCR-2**, regarding any pre-contact finds and shall be provided information after the Project Archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regard to significance and treatment. For any potential significant cultural resources, the Project Archaeologist shall make recommendations to the City to avoid or mitigate impacts to the resource. If significant pre-contact cultural resources, as defined by CEQA, are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to the Consulting Tribes for review and comment, as detailed within **MM-TCR-1**. The Project Archaeologist shall monitor the remainder of the project and implement the Plan accordingly. Preservation in place (i.e. avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery to excavate the resource along with subsequent laboratory processing and analysis. Disposition of significant Native American archaeological materials, such as reburial or curation by a qualified repository within San Bernardino County, shall be agreed upon by the City and Consulting Tribes. Any significant non-Native American archaeological material shall be curated at a public, non-profit institution with a research interest in the materials within San Bernardino County, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes. All identified cultural resources shall be recorded on appropriate California Department of Parks and Recreation (CA DPR 523) series forms and evaluated for significance. All findings shall be included within a Monitoring Report drafted by the Project Archaeologist and submitted to the City and Consulting Tribes for review. Final copies of the Monitoring Report shall be submitted to the City, Consulting Tribes, and South Central Coastal Information Center (SCCIC).

c) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less-Than-Significant Impact. There are no previously recorded cultural resources on the project site. The results of prior studies encompassing and adjacent to the Project site suggest that the area overall has a low potential for containing previously undocumented archaeological or historical resources (Appendix C). Further, since the project site has been previously disturbed, ground-disturbing activities associated with demolition of the proposed structures are unlikely to uncover previously unknown archaeological resources; however, if human skeletal remains are discovered during ground-disturbing activities, California Health and Safety Code Section 7050.5 states that the San Bernardino County Coroner must be immediately notified of the discovery. No further excavation or disturbance of the project site or any nearby area reasonably suspected to overlie adjacent remains can occur until the County Coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she must notify the Native American Heritage Commission in Sacramento within 24 hours. In accordance with PRC Section 5097.98, the Native American Heritage Commission must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant must complete his or her inspection within 48 hours of being granted access to the project site. The designated Native American representative would then, in consultation with the property owner, determine the disposition for the human remains. Therefore, based on compliance with existing state law, impacts associated with the discovery of human remains would be less than significant.

3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy – Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less-Than-Significant Impact. Energy resource consumption during project construction and operations are evaluated below.

Construction

Electricity. Temporary electric power for as-necessary lighting and electronic equipment would be provided by Southern California Edison (SCE). The amount of electricity used during construction would be minimal

because typical demand would be generated by electrically powered hand tools. The electricity used for construction activities would be temporary and minimal; therefore, project construction would not result in wasteful, inefficient, or unnecessary consumption of electricity.

Natural Gas. Natural gas is not anticipated to be required during construction of the project. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed below. Any minor amounts of natural gas that may be consumed as a result of project construction would be temporary and negligible and would not have an adverse effect; therefore, project construction would not result in wasteful, inefficient, or unnecessary consumption of natural gas.

Petroleum. The primary energy consumed during construction would be associated with petroleum usage. Potential impacts were assessed for off-road equipment and on-road vehicle trips during construction, as provided by the CalEEMod outputs (see Appendix A). Fuel consumption from construction equipment and vehicle trips was estimated by converting the total carbon dioxide (CO_2) emissions anticipated to be generated by the construction of the proposed project to gallons using conversion factors for CO_2 to gallons of gasoline or diesel. The conversion factor for gasoline is 8.78 kilograms per metric ton (MT) CO_2 per gallon, and the conversion factor for diesel is 10.21 kilograms per MT CO_2 per gallon (The Climate Registry 2025). Heavy-duty construction equipment associated with construction activities, vendor trucks, and haul trucks are assumed to use diesel fuel. Worker vehicles are assumed to be gasoline fueled. All details for construction criteria air pollutant emissions modeling discussed in Appendix A are also applicable for the estimation of construction-related energy consumption.

The estimated diesel fuel usage from construction equipment, haul trucks, and vendor trucks, as well as estimated gasoline fuel usage from worker vehicles is shown in Table 3.6-1.

Table 3.6-1. Project Construction Petroleum Demand

Phase	Off-Road Equipment (diesel)	Haul Trucks (diesel)	Vendor Trucks (diesel)	Worker Vehicles (gasoline)
	gallons			
Construction	19,727.45	2,594.13	10,467.97	13,355.86
			Total Petroleum Consumed	**46,145.41**

Notes: See Appendix A for details.

As shown in Table 3.6-1, the project is estimated to consume approximately 46,145 gallons of petroleum during the construction phase.[3] Notably, the project will be subject to CARB's In-Use Off-Road Diesel Vehicle Regulation that applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulation: (1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles, (2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System) and labeled, (3) restricts the adding of older vehicles into fleets starting on January 1, 2014, and (4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines, or installing Verified Diesel Emission Control Strategies (i.e., exhaust retrofits). The fleet must either show that its fleet average index was less than or equal to the calculated fleet average target rate, or that the fleet has met the Best Achievable Control Technology (BACT) requirements. Overall, because the

[3] For context, in 2022, California consumed about 628 million barrels of oil (EIA 2024). There are 42 U.S. gallons in a barrel, so California consumes so this equates to a total daily use of approximately 72.3 million gallons of petroleum.

project would not be unusual as compared to overall local and regional demand for energy resources and would not involve characteristics that require equipment that would be less energy-efficient than at comparable construction sites in the region or state, the project construction would not result in wasteful, inefficient, or unnecessary consumption of petroleum.

Operations

Electricity. The operational phase would require electricity for multiple purposes, including building heating and cooling, lighting, electronics, and electric pumps. The estimation of operational electricity for the project and existing uses were based on the CalEEMod default assumptions for the respective land uses. Table 3.6-2 presents the net increase in electricity demand for the project.

Table 3.6-2. Annual Electricity Demand

Scenario	kWh/Year
Project	592,255.13
Existing	152,417.20
Net Increase in Electricity Demand (Project minus Existing)	**439,837.93**

Source: Appendix A
Notes: kWh = kilowatt-hour.

According to these estimations, the project would consume approximately 592,255 kilowatt-hours (kWh) per year. Under baseline conditions, it is estimated that 152,417 kWh per year is used by the existing uses. Although electricity consumption associated with the project would increase by approximately 439,838 kWh per year, the project would be required to comply with the efficiency standards of the California Building Code (Title 24 Part 6 and Part 11), and the additional electricity demand for the proposed project would not be unusual or wasteful as compared to overall local and regional demand for energy resources.[4] For these reasons, electricity consumption of the project would not be considered inefficient or wasteful, and impacts would be less than significant.

Natural Gas. Natural gas consumption during operation would be required for building heating and cooling. For building consumption, natural gas default consumption rates in CalEEMod for the project and existing land uses and climate zone were used. Regarding the forklifts for project operations, the conversion factor for CNG is 0.054 kilograms per MT CO_2 per standard cubic foot, and 1.026 kilo-British thermal units (kBtu) per standard cubic foot (The Climate Registry 2025). 15 forklifts were estimated for the project, which were assumed to operate 8 hours per day, 365 days per year. As a conservative assumption, no forklifts were assumed for the existing warehouse. Table 3.6-3 presents the net increase in natural gas demand for the project.

Table 3.6-3. Annual Natural Gas Demand

Scenario	kBtu/Year
Project	
Buildings	2,280,673.17
CNG Forklifts	9,133,400.12
Total Project Demand	**11,414,073.29**

[4] For context, in 2024, total electricity consumption in San Bernardino County was approximately 16.2 billion kWh per year (CEC 2025a).

Existing	
Buildings	627,352.42
Total Existing Use Demand	**627,352.42**
Net Increase in Natural Gas Demand (Project minus Existing)	***10,786,720.87***

Source: Appendix A
Notes: CNG = compressed natural gas; kBtu = kilo-British thermal units.

According to these estimations, the project would consume approximately 11,414,073 kBtu per year. Under existing conditions, it is estimated that 627,352 kBtu per year is used by the existing uses. Although natural gas consumption associated with the project would increase by approximately 10,786,721 kBtu per year (primarily from the forklifts), the project would be required to comply with the efficiency standards of the California Building Code (Title 24 Part 6 and Part 11), and the additional natural gas demand for the project would not be unusual or wasteful as compared to other warehouses and the overall local and regional demand for energy resources.[5] For these reasons, natural gas consumption of the project would not be considered inefficient or wasteful, and impacts would be less than significant.

Petroleum. During operations, the majority of fuel consumption resulting from the project would involve the use of motor vehicles traveling to and from the project site, as well as diesel-fueled cargo handling equipment, a diesel-fueled emergency generator and fire pump, TRUs, and landscaping equipment. Fuel demand estimates for the project are provided in Table 3.6-4.

Table 3.6-4. Operational Petroleum Demand - Unmitigated

Scenario	Employee Vehicles (gasoline)	Haul Trucks (diesel)	Landscaping Equipment (gasoline)	Total Petroleum
	Gallons			
Project	12,879.08	64,785.33	277.11	**77,941.52**
Existing	3,926.21	18,942.69	76.23	**22,945.13**
			Net Increase in Electricity Demand (Project minus Existing)	***54,996.40***

Source: Appendix A.

As depicted in Table 3.6-4, the project would consume approximately 77,941 gallons of petroleum per year during operation and the existing scenario is estimated to consume approximately 22,945 gallons of petroleum per year. As such, the project would lead to an annual net increase of 54,996 gallons of petroleum consumption.

Over the lifetime of the project, the fuel efficiency of the vehicles being used by the employees and trucks for the project is expected to increase. As such, the amount of petroleum consumed as a result of vehicular trips to and from the project site during operation would decrease over time. There are numerous regulations in place that require and encourage increased fuel efficiency. For example, CARB has adopted the Advanced Clean Cars and Advanced Clean Trucks programs to accelerate the market for zero-emission vehicles in both the passenger car and medium/heavy-duty truck sectors. As such, operation of the project is expected to use decreasing amounts of petroleum over time, due to advances in fuel economy.

5 For context, in 2024, total natural gas consumption in San Bernardino County was about 54.7 billion kBtu per year (CEC 2025b).

In summary, although project implementation would result in an increase in petroleum use during operation, over time vehicles would use less petroleum due to advances in fuel economy and the additional demand for the project would not be unusual or wasteful as compared to other warehouses and the overall local and regional demand for petroleum resources. In addition, location of the project proximate to regional and local roadway systems tends to reduce VMT within the region, acting to reduce regional vehicle energy demands. As supported by the preceding discussions, project operational energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary and impacts would be less than significant.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less-Than-Significant Impact. The project would be subject to and would comply with, at a minimum, the California Building Energy Efficiency Standards (24 CCR Part 6 and Part 11). Part 6 of Title 24 establishes energy efficiency standards for non-residential buildings, including warehouses, constructed in California to reduce energy demand and consumption. Part 11 of Title 24 sets forth voluntary and mandatory energy measures that are applicable to the project under CALGreen. For nonresidential projects, some of the key mandatory CALGreen standards involve requirements related to bicycle parking, designated parking for clean air vehicles, electric vehicle (EV) charging stations for passenger vehicles, shade trees, water conserving plumbing fixtures and fittings, outdoor potable water use in landscaped areas, and construction waste management (24 CCR, Part 11). The project would comply with all applicable California code requirements for energy efficiency. On this basis, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, impacts would be less than significant.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

No Impact. The nearest active Alquist-Priolo Fault Zone to the project site is the San Jacinto Fault, located approximately 4.5 miles north of the project site (City of Rialto 2023b). According to the California Department of Conservation Fault Activity Map (CDOC 2015), the project site is not located in a designated earthquake fault zone. The proposed development lies outside of any Alquist Priolo Special Studies Zone and the potential for damage due to direct fault rupture is considered unlikely (Appendix D, Geotechnical Investigation). In addition, according to the City's General Plan Safety and Noise Element Update, although several earthquake faults exist within and in proximity to the City, no faults exist beneath the project site (City of Rialto 2023b); therefore, no impacts associated with fault rupture would occur.

ii) Strong seismic ground shaking?

Less-Than-Significant Impact. Similar to other areas located in the seismically active Southern California region, the City is susceptible to ground shaking caused by the several local fault systems. Historically, Rialto has experienced moderate to strong ground shaking. The San Jacinto, San Andreas, and Cucamonga Faults have the potential of generating earthquakes of maximum magnitudes ranging from 6.7 to 8.0 (City of Rialto 2010); however, the project site is not located within an active fault zone, and the project site would not be affected by ground shaking more than any other area in this seismic region. The project's geotechnical report provides specific design recommendations to ensure the structural integrity of the

project in the event that seismic ground shaking is experienced at the project site (Appendix D). In addition, the project would be designed in accordance with all applicable provisions established in the current California Building Code, which sets forth specific engineering requirements to ensure structural integrity during a seismic event. Compliance with these requirements would reduce the potential risk to people and structures with respect to strong seismic ground shaking; therefore, impacts associated with strong seismic ground shaking would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less-Than-Significant Impact. Liquefaction occurs when partially saturated soil loses its effective stress and enters a liquid state, which can result in the soil's inability to support structures above it. Liquefaction can be induced by ground-shaking events and is dependent on soil saturation conditions. According to the Safety and Noise Element Update of the City's General Plan, liquefaction is unlikely to occur in most areas of the City. However, liquefaction is a concern in the Lytle Creek Wash area where there are sandy soils and a high water table and in the areas near the Santa Ana River due to an extremely high water table (City of Rialto 2023b). According to the project's Geotechnical Report, liquefaction is not a concern for the project site (Appendix D). Therefore, impacts associated with seismic-related ground failure, including liquefaction, would be less than significant.

iv) Landslides?

No Impact. The project site is not located adjacent to or near any geographical feature that would be susceptible to landslides. The project site is relatively flat, exhibiting only a slight southerly gradient (Appendix D). No other significant surface features are identified within the project limits. As a result, the probability of a landslide on or near the project site is low; therefore, no impacts associated with landslides would occur.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Short-Term Construction Impacts

Less-Than-Significant Impact. Because the project would result in 1 acre or more of ground disturbance, the project would be subject to the National Pollutant Discharge Elimination System (NPDES) stormwater program, which requires obtaining coverage under the State Water Resources Control Board's General Permit for Discharges of Stormwater Associated with Construction Activity (Construction General Permit; Order 2009-0009-DWQ). Construction activities subject to the Construction General Permit include clearing, grading, and disturbances to the ground such as stockpiling and excavating. The Construction General Permit requires development and implementation of a Stormwater Pollution Prevention Plan (SWPPP). Among the required items that must be included within a SWPPP are project design features intended to protect against substantial soil erosion as a result of water and wind, commonly known as best management practices (BMPs). Typical BMPs include maintaining or creating drainages to convey and direct surface runoff from bare areas, and installing physical barriers such as berms, silt fencing, wattles, straw bales, and gabions. Implementation of a Construction General Permit, including preparation of a SWPPP and implementation of BMPs, would reduce both stormwater runoff and soil erosion impacts to acceptable levels; therefore, short-term construction impacts associated with soil erosion would be less than significant.

Long-Term Operational Impacts

Less-Than-Significant Impact. Once developed, the project site would include two warehouse buildings and paved surfaces, all of which would stabilize and help retain on-site soils. The project site would also contain pervious landscape areas that would include a mix of trees, shrubs, plants, and groundcover, which would also help retain on-site soils while preventing wind and water erosion from occurring; therefore, long-term operational impacts associated with soil erosion would be less than significant.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less-Than-Significant Impact**.** The project site is not susceptible to landslide or liquefaction. In addition, the project would be designed in accordance with all applicable provisions established in the current California Building Code, which sets forth engineering requirements to ensure structural integrity, regardless of the characteristics of underlying soils. The project would be designed consistent with the specific design recommendations of the project's geotechnical report (Appendix D). Compliance with the requirements of the California Building Code would further reduce the potential risk to people and structures with respect to a variety of geotechnical constraints; therefore, impacts associated with unstable geologic units/soils would be less than significant.

d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less-Than-Significant Impact. Expansive soils are characterized by their potential shrink/swell behavior. Shrink/swell is the change in volume (expansion and contraction) that occurs in certain fine-grained clay sediments from the cycle of wetting and drying. The volume change is influenced by the amount of moisture and the amount of clay in the soil. The soils at the project site are very low (Expansion Index=0-20) in expansion potential (Appendix D). Further, compliance with California Building Code requirements would reduce the potential risk to people and structures due to unstable and expansive soils; therefore, impacts associated with expansive soils would be less than significant.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The project would connect directly to the municipal sewer system and would not require septic tanks or any other alternative wastewater disposal system; therefore, no impacts associated with the adequacy of soils and septic systems would occur.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less-Than-Significant Impact. Paleontological resources are the remains or traces of plants and animals that are preserved in earth's crust, and per the Society of Vertebrate Paleontology (SVP 2010) guidelines, are older than written history or older than approximately 5,500 years. They are limited, nonrenewable resources of scientific and educational value, which are afforded protection under state laws and regulations.

According to surficial geological mapping by Dibblee and Minch (2004) at a scale of 1:24,000, the proposed project site is underlain by Holocene (< 11,700 years ago) alluvium (map unit Qa). The geotechnical report indicated the project site is underlain by a layer of artificial fill ranging from 1 to 2.5 feet in thickness (Appendix D). The artificial fill is in turn underlain by coarse-grained alluvium with an increase in cobbles with depth. Holocene alluvium has low paleontological sensitivity on the surface due to the young age; however, the sensitivity increases with depth, where the Holocene alluvium transitions to Pleistocene alluvium.

Dudek submitted a paleontological records search request to the Natural History Museum of Los Angeles County (LACM) of the proposed project site and the surrounding vicinity on March 24, 2022, and the results were received on April 2, 2022. The LACM reported no vertebrate fossil localities from within or near the proposed project site; however, they did report fossil localities from Pleistocene sedimentary deposits in the region (LACM 2022). These localities include LACM VP (Vertebrate Paleontology) 4619, which produced a mammoth (*Mammuthus*) from 100 feet below the ground surface (bgs) along Wineville Avenue in Eastvale. LACM 7811 yielded a fossil whipsnake (*Masticophis*) from 9 to 11 feet bgs in Chino Valley. A Bovid (Bovidae) was recovered in Corona from an unknown depth bgs. LACM VP 1728 produced horse (*Equus*) and camel (*Camelops*) from 15 to 20 feet bgs in Chino. A fossil horse (*Equus*) (LACM VP 7268 and 7271) was recovered from an unknown depth bgs south of Los Serranos Golf Course in the city of Chino Hills. Also in Chino Hills, LACM VP 7508 yielded an elephant relative (Proboscidea) and horse (*Equus*) from an unknown depth bgs. Finally, an undetermined member of the horse family (Equidae) (LACM VP 4540) was recovered from an unknown depth bgs in San Jacinto Valley.

Due to the coarse grained sediments underlying the project site that become coarser-grained with depth, impacts to paleontological resources are considered less than significant.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

The following analysis is based on the November 2025 *Willow and Valley Warehouses Project - Air Quality and Greenhouse Gas Emissions Technical Memorandum* (Appendix A) prepared by Dudek. For additional details, see Appendix A for the greenhouse gas (GHG) emissions calculation methodology and assumptions.

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less-Than-Significant Impact. In October 2008, the SCAQMD proposed recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects as presented in its *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold* (SCAQMD 2008b). This guidance document explored various approaches for establishing a significance threshold for GHG emissions. The draft interim CEQA thresholds guidance document was not adopted or approved by the Governing Board. However, in December 2008, the SCAQMD adopted an interim 10,000 metric tons carbon dioxide-equivalent (MT CO_2e) per-year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency (SCAQMD 2008b). SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with SCAQMD staff on developing GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. From December 2008 to September 2010, SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. SCAQMD has continued to consider adoption of significance thresholds for residential and general land use development projects. The most recent proposal, issued in September 2010, uses the following tiered approach to evaluate potential GHG impacts from various uses (SCAQMD 2010):

Tier 1 Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.

Tier 2 Consider whether or not the project is consistent with a locally adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.

Tier 3 Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MT CO_2e per year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MT CO_2e per year), commercial projects (1,400 MT CO_2e per year), and mixed-use projects (3,000 MT CO_2e per year). Under option 2, a single numerical screening threshold of 3,000 MT CO_2e per year would be used for all non-stationary source projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.

Tier 4 Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MT CO_2e per service population for project level analyses and 6.6 MT CO_2e per service population for plan level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.

Tier 5 Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

While the City has not adopted a numeric significance threshold, the City has previously relied on use of the 3,000 MT CO_2e per year threshold to evaluate the potential for a project to result in a signficant GHG

emissions impact under CEQA because it has been recommended by SCAQMD and SCAQMD is an expert agency in the Southern California region. Further, the SCAQMD provides substantial evidence that the thresholds are consistent with policy goals and 2050 GHG emissions reduction targets set by the state. Specifically, the thresholds were set at levels that capture 90% of the GHG emissions from the above-described uses, consistent with EO S-3-05 target of reducing GHGs to 80% below 1990 levels by 2050. Finally, the SCAQMD specifically recommended that the 3,000 MT CO_2e per year threshold be used by lead agencies for not only residential and commercial projects, but also industrial parks and warehouses as well (SCAQMD 2008b).

Construction Emissions

Construction of the project would result in GHG emissions, which are primarily associated with use of off-road construction equipment, on-road vendor trucks, and worker vehicles. CalEEMod was used to estimate GHG emissions during construction. Construction of the project is anticipated to last up to 12 months. Table 3.8-1 presents construction GHG emissions for the project.

Table 3.8-1. Estimated Annual Construction GHG Emissions

Year	CO_2	CH_4	N_2O	R	CO_2e
	metric tons per year				
2026	247.53	0.01	0.01	0.16	252.34
2027	204.51	0.01	0.01	0.16	208.44
Total for All Years of Construction	**452.04**	**0.02**	**0.03**	**0.32**	**460.78**
				Amortized Over 30-Years	*15.36*

Source: Appendix A.
Notes: GHG = greenhouse gas; CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; R = Refrigerants; CO_2e = carbon dioxide equivalent. Totals may not sum due to rounding.

As shown in Table 3.8-1, the estimated total GHG emissions during construction would be approximately 461 MT CO_2e. Estimated project-generated construction emissions amortized over 30 years would be approximately 15 MT CO_2e per year.

Operational Emissions

Operation of the project would generate GHG emissions from mobile sources (vehicular traffic), area sources (landscape maintenance equipment operation), energy use (natural gas combustion and utility generation of electricity consumed by the project), water supply, treatment, and distribution and wastewater treatment, solid waste disposal, refrigerants, and off-road equipment (CNG forklifts). In addition, GHG emissions from operation of the existing building was also estimated. Table 3.8-2 presents the net increase in GHG emissions (i.e., project minus existing), as well as sums the annual operational GHGs. Detailed operational model outputs are presented in Appendix A.

Table 3.8-2. Estimated Annual Operational GHG Emissions

Emissions Source	CO_2	CH_4	N_2O	R	CO_2e
	Metric Tons per Year				
Project					
Mobile	774.54	0.05	0.11	0.79	808.08

Table 3.8-2. Estimated Annual Operational GHG Emissions

Emissions Source	CO_2	CH_4	N_2O	R	CO_2e
	Metric Tons per Year				
Area	2.43	<0.01	<0.01	0.00	2.44
Energy	214.02	0.02	<0.01	0.00	214.89
Water	39.15	0.91	0.02	0.00	68.28
Waste	10.06	1.01	0.00	0.00	35.20
Off-road Equipment	484.62	0.01	<0.01	0.00	485.12
Total Project	***1,524.82***	***1.99***	***0.13***	***0.79***	***1,614.02***
Existing					
Mobile	227.88	0.02	0.03	0.28	237.88
Area	0.67	<0.01	<0.01	0.00	0.67
Energy	57.39	0.01	<0.01	0.00	57.62
Water	10.64	0.25	0.01	0.00	18.65
Waste	2.77	0.28	0.00	0.00	9.68
Total Existing	***299.34***	***0.55***	***0.04***	***0.28***	***324.50***
Net Change (Project – Existing)					
Net Change	**1,225.48**	**1.44**	**0.09**	**0.51**	**1,289.52**
			Amortized Construction and Decommissioning Emissions		*15.36*
			Total Net Operations with Amortized Construction Emissions		**1,304.88**

Source: Appendix A.
Notes: GHG = greenhouse gas; CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; R = refrigerants; CO_2e = carbon dioxide equivalent; <0.01 = value is less than 0.01.
Totals may not sum due to rounding.

As shown in Table 3.8-2, the estimated net increase in GHG emissions from operation of the project would be approximately 1,305 MT CO_2e per year, including amortized construction emissions. Annual operational GHG emissions with amortized construction emissions would not exceed the SCAQMD recommended threshold of 3,000 MT CO_2e per year. This impact would be less than significant.

b) Would the project generate conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less-Than-Significant Impact. The evaluation below assesses the potential for the project to conflict with Senate Bill (SB) 32 (2017 Scoping Plan), AB 1279 (2022 Scoping Plan), and SCAG's RTP/SCS.

Project Potential to Conflict with State Reduction Targets and CARB's Scoping Plan

The California State Legislature passed AB 32 to provide initial direction to limit California's GHG emissions to 1990 levels by 2020 and initiate the state's long-range climate objectives. Since the passage of AB 32, the state has adopted GHG emissions reduction targets for future years beyond the initial 2020 horizon year. CARB is required to develop a Scoping Plan, which provides the framework for actions to achieve the state's GHG emission targets. While the Scoping Plan is not directly applicable to specific projects, nor is it intended to be used as the sole basis for project-level evaluations, it is the official framework for the measures and regulations that will be implemented to reduce California's GHG emissions in alignment with

the adopted targets. Therefore, a project would be found to not conflict with the statutes if it meets the Scoping Plan policies and would not impede attainment of the goals therein.

For the project, the relevant GHG emissions reduction targets include those established by SB 32 and AB 1279, which require GHG emissions be reduced to 40% below 1990 levels by 2030, and 85% below 1990 levels by 2045, respectively. In addition, AB 1279 requires the state achieve net zero GHG emissions by no later than 2045 and achieve and maintain net negative GHG emissions thereafter. CARB's 2017 Scoping Plan update was the first to address the state's strategy for achieving the 2030 GHG reduction target set forth in SB 32 (CARB 2017), and the most recent CARB 2022 Scoping Plan update outlines the state's plan to reduce emissions and achieve carbon neutrality by 2045 in alignment with AB 1279 and assesses progress is making toward the 2030 SB 32 target (CARB 2022). As such, given that SB 32 and AB 1279 are the relevant GHG emission targets, the 2017 and 2022 Scoping Plan updates that outline the strategy to achieve those targets, are the most applicable to the project.

The 2017 Scoping Plan included measures to promote renewable energy and energy efficiency (including the mandates of SB 350), increase stringency of the low-carbon fuel standard, measures identified in the Mobile Source and Freight Strategies, measures identified in the proposed Short-Lived Climate Pollutants plan, and increase stringency of SB 375 targets.[6] The 2022 Scoping Plan builds upon and accelerates programs currently in place, including moving to zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; and displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines) (CARB 2022). Many of the measures and programs included in the Scoping Plan would result in the reduction of project-related GHG emissions with no action required at the project level, including GHG emission reductions through increased energy efficiency and renewable energy production (SB 350), reduction in carbon intensity of transportation fuels (low-carbon fuel standard), and the accelerated efficiency and electrification of the statewide vehicle fleet (Mobile Source Strategy). Table 3.8-3 summarizes the project's potential to conflict with the applicable 2017 Scoping Plan.

6 Pursuant to SB 375, CARB set per capita GHG emissions reduction targets from passenger vehicles for each of the state's 18 metropolitan planning organizations.

Table 3.8-3. Project Potential to Conflict with 2017 Scoping Plan

Action	Responsible Parties	Potential to Conflict
Implement SB 350 by 2030		
Increase the Renewables Portfolio Standard to 50% of retail sales by 2030 and ensure grid reliability.	CPUC, CEC, CARB	*No conflict*. The project would use energy from Southern California Edison (SCE). SCE has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources. The project would not interfere with or obstruct SCE energy source diversification efforts.
Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.		*No conflict*. The project would be constructed in compliance with the current California Building Code requirements at the time of construction. New buildings must achieve compliance with the applicable 2025 Building and Energy Efficiency Standards and the 2025 California Green Building Standards requirements, effective January 1, 2026.
Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in Integrated Resource Planning (IRP) to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly- owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.		
Implement Mobile Source Strategy (Cleaner Technology and Fuels)		
At least 1.5 million zero emission and plug-in hybrid light-duty EVs by 2025.	CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of Transportation (Caltrans), CEC, OPR, Local Agencies	*No conflict*. This is a CARB Mobile Source Strategy. The project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2025 targets. As this is a CARB enforced standard, vehicles that access the project are required to comply with the standards and will therefore comply with the strategy.
At least 4.2 million zero emission and plug-in hybrid light-duty EVs by 2030.		*No conflict*. This is a CARB Mobile Source Strategy. The project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2030 targets. As this is a CARB enforced standard, vehicles that access the project are required to comply with the standards and will therefore comply with the strategy.

Table 3.8-3. Project Potential to Conflict with 2017 Scoping Plan

Action	Responsible Parties	Potential to Conflict
Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.		***No conflict***. This is a CARB Mobile Source Strategy. The project would not obstruct or interfere with CARB efforts to further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations. As this is a CARB enforced standard, vehicles that access the project are required to comply with the standards and will therefore comply with the strategy.
Medium- and Heavy-Duty GHG Phase 2.		***No conflict***. This is a CARB Mobile Source Strategy. The project would not obstruct or interfere with CARB efforts to implement Medium- and Heavy-Duty GHG Phase 2. As this is a CARB enforced standard, vehicles that access the project are required to comply with the standards and will therefore comply with the strategy.
Last Mile Delivery: New regulation that would result in the use of low NO_X or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5% of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10% in 2025 and remaining flat through 2030.		***No conflict***. This is a CARB Mobile Source Strategy. The project would not obstruct or interfere with CARB cleaner last mile delivery trucks in California. As this is a CARB enforced standard, vehicles that access the project are required to comply with the standards and will therefore comply with the strategy.
Harmonize project performance with emissions reductions and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project selection, etc.).	CalSTA, SGC, OPR, CARB, Governor's Office of Business and Economic Development (GO-Biz), California Infrastructure and Economic Development Bank (IBank), Department of Finance (DOF), California Transportation Commission (CTC), Caltrans	***No conflict***. The project would not obstruct or interfere with agency efforts to harmonize transportation facility project performance with emissions reductions and increase competitiveness of transit and active transportation modes.

Table 3.8-3. Project Potential to Conflict with 2017 Scoping Plan

Action	Responsible Parties	Potential to Conflict
By 2019, develop pricing policies to support low-GHG transportation (e.g. low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR, SGC, CARB	***No conflict***. The project would not obstruct or interfere with agency efforts to develop pricing policies to support low-GHG transportation.
Implement California Sustainable Freight Action Plan		
Improve freight system efficiency.	CalSTA, CalEPA, CNRA, CARB, Caltrans, CEC, GO-Biz	***No conflict***. This measure would apply to all trucks accessing the project site, including existing trucks or new trucks that are part of the statewide goods movement sector. The project would not obstruct or interfere with agency efforts to improve freight system efficiency.
Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.	CARB	***No conflict***. This measure, which was increased to 20% reduction in carbon intensity by 2030, applies to all fuel purchased and used by the project vehicles in the state. The project would not obstruct or interfere with agency efforts to implement a Low Carbon Fuel Standard.
By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink		
Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments		***No conflict***. To the extent appropriate for the proposed industrial buildings, wood products would be used in construction.

Source: CARB 2017.

Table 3.8-4 highlights the measures from the 2022 Scoping Plan that are relevant to the project.

Table 3.8-4. Project Potential to Conflict with 2022 Scoping Plan

Sector	Action	Potential to Conflict
GHG Emissions Reductions Relative to the SB 32 Target	40% below 1990 levels by 2030	***No conflict***. While the SB 32 GHG emissions reduction target is not an Action that is analyzed independently, it is included in Table 2-1 of the 2022 Scoping Plan for reference. The project would not obstruct or interfere with agency efforts to meet the SB 32 reduction goal.
Smart Growth / VMT	VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045	***No conflict***. The project would not obstruct or interfere with agency efforts to meet this regional VMT reduction goal, including through implementation of SB 375. As detailed below, the project would be

Table 3.8-4. Project Potential to Conflict with 2022 Scoping Plan

Sector	Action	Potential to Conflict
		consistent with the SCAG 2024–2050 RTP/SCS, which is the regional growth management strategy that targets per capita GHG reduction from passenger vehicles and light trucks in the Southern California Region pursuant to SB 375.
Light-duty Vehicle (LDV) Zero Emission Vehicles (ZEVs)	100% of LDV sales are ZEV by 2035	***No conflict***. As this action pertains to LDV sales within California, the project would not obstruct or interfere with its implementation.
Truck ZEVs	100% of medium-duty vehicle (MDV)/ heavy-duty vehicle (HDV) sales are ZEV by 2040	***No conflict***. As this action pertains to MDV and HDV sales within California, the project would not obstruct or interfere with its implementation.
Electricity Generation	Sector GHG target of 38 million metric tons of carbon dioxide equivalent (MMTCO2e) in 2030 and 30 MMTCO2e in 2035 Retail sales load coverage1 20 gigawatts (GW) of offshore wind by 2045 Meet increased demand for electrification without new fossil gas-fired resources	***No conflict***. As this Action pertains to the statewide procurement of renewably generated electricity, the project would not obstruct or interfere with its implementation.
New Residential and Commercial Buildings	All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030	***No conflict***. Based on timing of this Action, it would not apply to the project.
Construction Equipment	25% of energy demand electrified by 2030 and 75% electrified by 2045	***No conflict***. As this Action pertains to the electrification of off-road equipment across California, the project would not obstruct or interfere with its implementation.
Low Carbon Fuels for Transportation	Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen	***No conflict***. The project would not obstruct or interfere with agency efforts to increase the provision of low carbon fuels for transportation.
Low Carbon Fuels for Buildings and Industry	In 2030s biomethane blended in pipeline Renewable hydrogen blended in fossil gas pipeline at 7% energy (~20% by volume), ramping up between 2030 and 2040 In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters	***No conflict***. The project would not obstruct or interfere with agency efforts to increase the provision of low carbon fuels for use in buildings and industry.

Table 3.8-4. Project Potential to Conflict with 2022 Scoping Plan

Sector	Action	Potential to Conflict
High GWP Potential Emissions	Low GWP refrigerants introduced as building electrification increases, mitigating HFC emissions	***No conflict***. The project would not obstruct or interfere with agency efforts to introduce low GWP refrigerants.

Source: CARB 2022.
Notes:
[1] As noted in Table 2-1 of the 2022 Scoping Plan, SB 100 speaks only to retail sales and state agency procurement of electricity (i.e., wholesale or non-retail sales and losses from storage and transmission and distribution lines are not subject to the law).

Based on the analysis in Table 3.8-3 and Table 3.8-4, the project would be consistent with the applicable strategies and measures in the 2017 Scoping Plan and 2022 Scoping Plan, respectively.

The 2045 carbon neutrality goal required CARB to expand proposed actions in the 2022 Scoping Plan to include those that capture and store carbon in addition to those that reduce only anthropogenic sources of GHG emissions. However, the 2022 Scoping Plan emphasizes that reliance on carbon sequestration in the state's natural and working lands will not be sufficient to address residual GHG emissions, and achieving carbon neutrality will require research, development, and deployment of additional methods to capture atmospheric GHG emissions (e.g., mechanical direct air capture). Given that the specific path to neutrality will require development of technologies and programs that are not currently known or available, the project's role in supporting the statewide goal would be speculative and cannot be wholly identified at this time.

Overall, the project would comply will all regulations adopted in furtherance of the Scoping Plan to the extent applicable and required by law. As demonstrated above, the project would not conflict with CARB's 2017 or 2022 Scoping Plan updates and with the state's ability to achieve the 2030 and 2045 GHG reduction and carbon neutrality goals.

Potential to Conflict with SCAG's RTP/SCS

On April 4, 2024, SCAG adopted the 2024–2050 RTP/SCS, also referred to as Connect SoCal 2024. Connect SoCal 2024 builds on the prior RTP/SCS and identifies the following strategy areas to support its environmental goals: Sustainable Development, Air Quality, Clean Transportation, Natural and Agricultural Lands Preservation, and Climate Resilience (SCAG 2024). The primary objective of the RTP/SCS is to provide guidance for future regional growth (i.e., the location of new residential and non-residential land uses) and transportation patterns throughout the region, as stipulated under SB 375. The project's potential to conflict with the 2024–2050 RTP/SCS strategies is presented below.

- **Sustainable Development.** The 2024–2050 RTP/SCS identifies sustainable development, including water and energy-efficient building practices and green infrastructure, as a strategy to reduce GHG emissions. The project would support this measure by meeting all applicable green building standards, including Title 24 Part 6 (California Energy Efficiency Standards) and Part 11 (California Green Building Standards), that are in effect at the time of design and construction.
- **Air Quality.** The 2024–2050 RTP/SCS identifies air quality as an environmental strategy because the transportation sector is the predominant source of criteria air pollutant emissions in the region. The 2024–2050 RTP/SCS states that a comprehensive and coordinated regional solution with integrated land use and transportation planning from all levels of governments will be required to achieve the needed emission reductions (SCAG 2024). According to the SCAG Comprehensive

Regional Goods Movement Plan and Implementation Strategy, the region will run out of suitably zoned vacant land designated for warehouse facilities in or around 2028. Thus, the project would meet the growing demand for warehousing space through the redevelopment of an older office/warehouse building use and would do so in an area located within 0.5-mile of major roadways (San Bernardino Freeway, West Valley Boulevard, and South Riverside Avenue), thereby reducing the need for longer distance trips and resulting in associated reductions in air pollutant and GHG emissions.

- **Clean Transportation.** One of the technology innovations identified in the 2024–2050 RTP/SCS that would apply to the project is the promotion and support of low emission technologies for transportation, such as alternative fueled vehicles to reduce per capita GHG emissions. The project would not conflict with SCAG's ability to implement this strategy and would utilize CNG forklifts during operation.
- **Natural and Agricultural Lands Preservation.** The 2024–2050 RTP/SCS promotes the conservation and restoration of natural and agricultural lands through several policies, such as quantifying the carbon sequestration potential of natural and agricultural lands and prioritizing sensitive habitat and wildlife corridors for permanent protection. The project would redevelop an already disturbed, non-agricultural site.
- **Climate Resilience.** The 2024–2050 RTP/SCS promotes regional coordination and solutions for effective emergency response for climate-related hazards. Additionally, in the category of climate resilience, SCAG has established the following policies: prioritize the most vulnerable populations and communities subject to climate hazards, support local and regional climate and hazard planning, support nature-based solutions to increase regional resilience, promote sustainable water use planning, and support an integrated planning approach to help jurisdictions meet housing needs in a drier environment. While the project does not directly pertain to these regional coordination efforts for climate resilience, the project would not interfere with this strategy.

Based on the analysis above, the project would be consistent with the SCAG 2024–2050 RTP/SCS.

Summary

The project demonstrates consistency with the CARB's Scoping Plan and would not conflict with other regulations regarding reductions to GHG emissions including SB 32 and AB 1279. Additionally, the project would be consistent with the SCAG 2024–2050 RTP/SCS.

3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. 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?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 that 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 or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less-Than-Significant Impact.

Short-Term Construction Impacts

In July 2021, a Phase I ESA (Appendix E) for 280 West Valley Boulevard was prepared by HEI Corporation to characterize the potential hazards associated with the historical and current uses of the project site and surrounding areas. Aerial photographs from 1938 to 1980 showed the project site to be undeveloped with no activity observed on the site. By 1986, a shop and office building, along with a fuel island canopy, was developed on the project site. A 10,000 gallon gasoline underground storage tank (UST) was removed from the eastern side of the project site in 2005, and an Underground Fuel Tank Closure Report was prepared. The report states that no impacted soils were observed during the uncovering process or removal process.

Soil sampling was conducted that same year, and the results indicated that further investigation was not warranted. Based on the results of the research, available data, and a site survey, the Phase I ESA (Appendix E) revealed no evidence of recognized environmental conditions, and no further action is required.

Potentially hazardous materials would likely be handled on the project site as part of project construction. These materials would include gasoline, diesel fuel, lubricants, and other petroleum-based products required to operate and maintain construction equipment. Handling of these potentially hazardous materials would be temporary and would coincide with the short-term construction phase of the project.

Although these materials would likely be stored on the project site, storage would be required to comply with the guidelines set forth by each product's manufacturer and with all applicable federal, state, and local regulations pertaining to the storage of hazardous materials. Consistent with federal, state, and local requirements, the transport of hazardous materials to and from the project site would be conducted by a licensed contractor. Any handling, transport, use, or disposal of hazardous materials would comply with all relevant federal, state, and local agencies and regulations, including EPA, the California Department of Toxic Substances Control, OSHA, the California Department of Transportation (Caltrans), the Resource Conservation and Recovery Act, and the SCAQMD. Therefore, with compliance with applicable regulations, short-term construction impacts related to the transport, use or disposal of hazardous materials would be less than significant.

Long-Term Operational Impacts

Potentially hazardous materials associated with project operations would include materials used during typical cleaning and maintenance activities. Although these potentially hazardous materials would vary, they would generally include household cleaning products, paints, fertilizers, and herbicides and pesticides. Many of these materials are considered household hazardous wastes, common wastes, and/or universal wastes by the EPA, which considers these types of wastes to be common to businesses and households and to pose a lower risk to people and the environment than other hazardous wastes when properly handled, transported, used, and disposed of (EPA 2021). Federal, state, and local regulations typically allow these types of wastes to be handled and disposed of with less stringent standards than other hazardous wastes, and many of these wastes do not have to be managed as hazardous waste. Additionally, any potentially hazardous material handled on the project site would be limited in both quantity and concentrations, consistent with other similar industrial uses located in the City, and any handling, transport, use, and disposal would comply with applicable federal, state, and local agencies and regulations. Further, as mandated by OSHA (OSHA n.d.), all hazardous materials stored on the project site would be accompanied by a Material Safety Data Sheet, which would inform employees and first responders as to the necessary remediation procedures in the case of accidental release. Therefore, long-term operational impacts associated with hazardous materials would be less than significant.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less-Than-Significant Impact. Refer to Section 3.9(a).

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. The nearest school to the project site is Joe Baca Middle School (1640 S Lilac Ave.), which is located 0.27 miles west of the project site. Therefore, no impacts associated with emitting or handling hazardous materials within 0.25 miles of a school would occur.

d) Would the project be located on a site that 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?

No Impact. The project site is not included on any hazardous waste site lists, including the California Department of Toxic Substances Control's EnviroStor database, the State Water Resources Control Board's GeoTracker site, the Cortese list, or other lists compiled pursuant to Section 65962.5 of the Government Code (CalEPA 2022; DTSC 2022; SWRCB 2022). Therefore, no impacts associated with hazardous materials sites would occur.

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 or excessive noise for people residing or working in the project area?

No Impact. The project site is located approximately 11.5 miles east of Ontario International Airport and approximately 9 miles northeast of the Riverside Municipal Airport. The project site is not located within the Airport Influence Area of the Ontario International Airport nor the Riverside Municipal Airport (City of Ontario 2011; County of Riverside 2005). Further, based on the relatively large distance between the project site and these public airports, the project would not result in a safety hazard for people working in the project area; therefore, no impacts associated with public airport hazards would occur.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less-Than-Significant Impact. There are several primary corridors throughout the City that may be used for an evacuation, including N. Riverside Avenue, W. Baseline Road, W. Rialto Avenue, and U.S. Route 66, among others included in Exhibit 5.11, Evacuation Route Corridors, in the City of Rialto General Plan Safety and Noise Element Update (City of Rialto 2023b). Vehicle access to the project site would be provided via S Willow Street and W Valley Boulevard. Valley Boulevard is classified as a major highway in the Gateway Specific Plan (City of Rialto 1990). Valley Boulevard provides direct regional access to I-10, located to the south of the project site; thus, this street could serve as emergency evacuation routes for the project area. The project would not include any project-adjacent, off-site improvements within these abutting roadways that would impede response or evacuation activities in the event of an emergency; therefore, impacts associated with emergency response and evacuation routes would be less than significant.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. According to CAL FIRE's 2025t Updated Fire Hazard Severity Zones, the project site is not located in an area identified as being susceptible to wildland fire (CAL FIRE 2025). In addition, the City of

Rialto General Plan Safey and Noise Element Update, Exhibit 5.9, Fire Hazards, does not identify the project site as being located in a fire hazards severity zone (City of Rialto 2023b). Further, the project site is located in a predominantly developed portion of the City, and no wildland/urban interfaces occur on the project site; therefore, no impacts associated with wildland fire would occur.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

The following analysis is based on the Water Quality Management Plan and the Preliminary Hydrology Report prepared in April 2022 by Armstrong & Brooks Consulting Engineering, Inc., and included as Appendices F-1 and F-2, respectively.

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Short-Term Construction Impact

Less-Than-Significant Impact. Construction of the project would include earthwork activities that could potentially result in erosion and sedimentation, which could subsequently degrade downstream receiving waters and violate water quality standards. Stormwater runoff during the construction phase may contain silt and debris, resulting in a short-term increase in the sediment load of the municipal storm drain system. Substances such as oils, fuels, paints, and solvents may be inadvertently spilled on the project site and subsequently conveyed via stormwater to nearby drainages, watersheds, and groundwater.

The project would be subject to the municipal NPDES permit, which requires measures to prohibit non-stormwater discharges into the storm sewer and to control the discharge of stormwater to the maximum extent practical. These measures include BMPs, control techniques, and system design methods. The Santa Ana Regional Water Quality Control Board (RWQCB) issues NPDES permits for construction activities that would involve 1 acre or more. The City falls within the jurisdiction of San Bernardino County and, thus, is subject to the municipal stormwater permit issued by the Santa Ana RWQCB.

The NPDES permit requires implementation of a stormwater quality management program that specifies guidelines to control, reduce, and monitor discharges of waste to storm drains. As such, through compliance with the water quality standards set forth in the NPDES permit, the wastewater generated during construction of the project would not adversely affect water quality; therefore, short-term construction impacts associated with water quality would be less than significant.

Long-Term Operational Impacts

Less-Than-Significant Impact. The project would be subject to the Municipal Separate Storm Sewer System (MS4) Permit, issued to San Bernardino County and incorporated cities within San Bernardino County by the Santa Ana RWQCB. The MS4 Permit requires implementation of low-impact development BMPs to prevent pollutants from being discharged off site by mimicking pre-development site hydrology and feasible source control. The low-impact development ordinance is designed to reduce runoff from impervious surfaces through landscape design that promotes water retention, permeable surface design, natural drainage systems, and on-site retention where feasible. These project-specific designs would reduce impacts to water quality associated with redevelopment.

In addition, the project-specific water quality management plan (Appendix F-1) ensures appropriate BMPs for post-construction and operations of the project. The combination of low-impact development BMPs and source-control and treatment-control BMPs addressed within the water quality management plan would address identified pollutants and hydrologic concerns from new development that could result in impacts to water quality standards. Therefore, long-term impacts associated with water quality would be less than significant.

b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Groundwater Supplies

Less-Than-Significant Impact. The project site is located within the Rialto Public Works Department Water Division service area. The City's Water Division's primary source of water is City-owned water wells. These wells draw water from four water basins—Lytle Creek Surface Water Basin, Rialto Ground Water Basin, Bunkerhill Ground Water Basin, and Chino Hill Ground Water Basin (City of Rialto 2010). The City has pumped an average of 7,252 acre-feet of water per year in the past five years from these basins (City of Rialto 2021b).

Additionally, according to the geotechnical investigation (Appendix D), groundwater was not encountered during test excavations, which extended to a maximum depth of 18 feet. Historic high groundwater in the vicinity has been recorded greater than 100 feet below grade at nearby wells (Appendix D). As such, the project's subsurface construction activities, which would only extend a few feet below grade, are highly unlikely to encounter groundwater, and dewatering activities are not anticipated to be necessary. Therefore, impacts associated with groundwater supplies would be less than significant.

Groundwater Recharge

Less-Than-Significant Impact. Although not fully developed, the project site is highly disturbed and does not contain a groundwater recharge basin or other facilities that promote groundwater recharge. Thus, under the existing condition, the project site is not considered an important location for groundwater recharge.

Following construction, the project site would contain landscape areas and other pervious surfaces that would allow for a similar percentage of water to percolate into the subsurface soils compared to the existing conditions. In addition, the project would include a detention/infiltration basin on site to capture and infiltrate stormwater runoff; therefore, impacts associated with groundwater recharge would be less than significant.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) Result in substantial erosion or siltation on- or off-site?

Less-Than-Significant Impact. Under the existing condition, the ground surface is covered with soil in the northern portion of the site and covered with asphalt pavement associated with the existing building on the southern portion of the site. Thus, implementation of the project would increase the amount of impervious areas on site and alter existing drainage patterns; however, the project site does not currently have infiltration basins or capture systems in place to control stormwater runoff. The project would be required to conform to all applicable federal, state, and local requirements, including the current MS4 Permit adopted by the Santa Ana RWQCB. Compliance with these requirements would ensure that the new drainage system is designed with adequate capacity to capture stormwater flow to prevent erosion and on-site and off-site flooding impacts.

As such, altering the on-site drainage pattern would be conducted in a manner consistent with all applicable standards related to the collection and treatment of stormwater; therefore, impacts associated with altering the existing drainage pattern of the project site would be less than significant.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Less-Than-Significant Impact. Refer to Section 3.10(c)(1).

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less-Than-Significant Impact. Under the existing condition, the ground surface is covered with soil in the northern portion of the site and covered with asphalt pavement associated with the existing building on the southern portion of the site. The project site does not currently have infiltration basins or capture systems in place to control stormwater runoff. Although the project would increase the amount of impervious surfaces on the project site, the proposed drainage system would be designed to conform to all applicable federal, state, and local requirements, including the current MS4 Permit adopted by the Santa Ana RWQCB. Compliance with these requirements would ensure the new drainage system is designed to have adequate capacity to capture stormwater flow to prevent the conveyance of sediment, debris, and other constituents potentially contained in on-site stormwater from leaving the project site and impacting off-site and downstream receiving waters. Therefore, impacts associated with water quality standards and runoff waters would be less than significant.

iv) Impede or redirect flood flows?

No Impact. According to the Federal Emergency Management Agency Flood Insurance Rate Map No. 06071C8678J, the project site is located in an area of minimal flood hazard (Zone X) (FEMA 2016). In addition, per the City's General Plan Safety and Noise Element Update Community Exposure to Flooding map (Exhibit 5.2), the project site is located within Zone X which indicates minimal flooding hazard (City of Rialto 2023b); therefore, no impacts associated with flooding would occur.

d) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

No Impact. Because of the project's inland location, relatively flat topography, and lack of an adjacent perennial body of water, the project site would not be susceptible to flood, tsunami, or seiche; therefore, no impacts associated with these natural phenomena would occur.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less-Than-Significant Impact. Refer to Sections 3.10(a) and 3.10(b).

3.11 Land Use and Planning

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI.	**LAND USE AND PLANNING** – Would the project:				
a)	Physically divide an established community?	☐	☐	☐	☒
b)	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

a) Would the project physically divide an established community?

No Impact. The physical division of an established community typically refers to the construction of a linear feature (e.g., a major highway or railroad tracks) or removal of a means of access (e.g., a local road or bridge) that would impair mobility within an existing community or between a community and outlying area.

Under the existing conditions, the project site is developed and is the current location for Goodfellow Corporation, which sells and rents crushers and conveyor equipment for the aggregate industry (Appendix E). As such, the project is not used as a connection between established communities. Instead connectivity within the area surrounding the project site is facilitated via local roadways. As such, the project would not impede movement within an established community, or from one established community to another. Therefore, no impacts associated with physically dividing an established community would occur.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less-Than-Significant Impact. The City General Plan Existing Land Use Map designates the project site as General Commercial with a Specific Plan overlay. As stated in the General Plan the Specific Plan Overlay requires the implementation of a Specific Plan and defers a determination of land use designations to the corresponding specific plan. The project is proposing a general plan amendment to change the project site's general plan land use designation from General Commercial with a Specific Plan overlay to Business Park with Specific Plan overlay. This general plan designation is consistent with other existing uses located along the Rialto Channel within the Gateway Specific Plan area.

The project site is located within the boundaries of the City's Gateway Specific Plan area. The Gateway Specific Plan is intended to revitalize and upgrade the Gateway area of the City. The Gateway Specific Plan proposes a mixed-use project with retail uses along Riverside Avenue, office and research and development parks fronting on San Bernardino Avenue, freeway commercial (hotels, eating establishments, and auto services) along Valley Boulevard, and light industrial parks in the western portion of the plan area (City of Rialto 1990). Land use designations within the Gateway Specific Plan include Office Park (O-P), Retail Commercial (R-C), Freeway Commercial (F-C), and Industrial Park (I-P). Additionally, the Gateway Specific

Plan contains development standards that act as a customized set of zoning standards for the project site. This approach allows the City a greater degree of control over the location and design of development within the Specific Plan area, ensuring compliance with the Specific Plan's goals and objectives. Development Guidelines for are provided in Section 5 of the Gateway Specific Plan (City of Rialto 1990), and include standards regarding lot size, landscape coverage, setbacks, and floor area ratio, among others.

The Gateway Specific Plan designates the project site as Freeway Commercial (F-C) for uses such as eating/dining, lodging, auto services, and some office/retail uses. The project is proposing a specific plan amendment to change the project site's specific plan land use designation from Freeway Commercial to Industrial Park (I-P). These future uses would include those related to warehouse, distribution, and/or logistics, which is generally consistent with the permissible uses and activities allowed by the City in the Industrial Park zone. Additionally, the Industrial Park land use designation has already been accounted for within the Gateway Specific Plan, and this specific plan amendment would continue the existing pattern of industrial park uses along the Rialto Channel within the Gateway Specific Plan. It follows that the project's land use, activities, and development intensity were already assumed and evaluated in the Gateway Specific Plan and Gateway Specific Plan EIR (City of Rialto 1990), respectively, and the project would then be consistent with the local plans, policies, and regulations governing land use decisions; therefore, impacts associated with applicable land use plans, policies, and regulations would be less than significant.

3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. 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 availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The City contains aggregate mineral resources. According to the City's General Plan Land Use Element Update (City of Rialto 2023a), the project site is not located in an area containing aggregate resource materials. Therefore, no impacts associated with mineral resources would occur.

b) Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. Refer to the response provided in Section 3.11(a).

3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE – Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Short-Term Construction Impacts

Less-than-Significant Impact With Mitigation Incorporated. The project site is bounded on the north by a concrete lined channel, an undeveloped parcel, and Rialto Fire Station No. 205. East of the project site is a self-storage facility. The site is bounded by streets to the south (W. Valley Boulevard) and on the west (S. Willow Avenue). South and west of these streets are predominated by industrial uses with scattered retail uses. The nearest noise sensitive land uses are residences located about 680 feet west of the site, west of Lilac Avenue. There is also a hotel, approximate 1,000 feet southwest of the project site at the intersection of W. Valley Blvd and S. Lilac Ave.

Construction activities include temporary noise and vibration sources with emission levels varying from hour to hour and day to day, depending on the equipment in use, the operations performed, and the distance between the source and receptor. The proposed project would be required to comply with the Rialto noise ordinance (City Municipal Code Section 9.50.070 – Disturbances from Construction Activity) by adhering to the following construction schedule:

> Construction activity for site preparation and for future development shall be consistent with City Noise Ordinance requirements, which limits construction activities to the hours between 7:00 a.m. and 5:30 p.m., Monday through Friday and between 8:00 a.m. and

5:00 p.m. Saturday (Oct. 1 through April 30); to the hours between 6:00 a.m. and 7:00 p.m., Monday through Friday and between 8:00 a.m. and 5:00 p.m. Saturday (May 1 through Sept. 30); and prohibiting construction during Sundays and state holidays.

Sound levels from construction equipment typically range from about 65 to 85 dBA L_{eq} at a distance of 50 feet,[7] At distances of 680 and 1,000 feet or more, sound levels would be 23 to 26 dB lower, not taking shielding from intervening structures into account. Considering the substantial shielding provided by the industrial and commercial structures located west of the site, exterior construction sound levels at these nearest sensitive land uses would be anticipated to be in the range of 35 to 55 dBA L_{eq} or less. Sound levels inside residences would be anticipated to be about 15 dB lower with windows open and 25 dB lower with windows closed.

Sounds from construction activities may be mildly annoying at times but would not be anticipated to result in speech interference and restricting construction activities to the daytime period will avoid disruption of evening time relaxation and overnight sleep periods. The Safety and Noise Element Update of the City General Plan does not identify sound level limits for construction activity (City of Rialto 2023b). As such, the requirements contained in the City Noise Ordinance (Chapter 9.50 of the Rialto Municipal Code) are the only applicable restrictions that regulate construction activity. City Municipal Code Section 9.50.070 specifies time-of-day constraints on construction activity; however, the City Municipal Code does not contain noise-level limits pertaining to construction activity. Therefore, for the purposes of this analysis, project compliance with City Municipal Code Section 9.50.070 would result in a less-than-significant construction noise impact. For informational purposes, construction-generated sound levels would also be below the Federal Transit Administration construction noise level threshold of 80 dBA L_{eq} over an 8-hour period,[8] which is commonly used as a threshold of significance in the absence of local construction noise limits.

Construction noise measures are still recommended to further minimize the potential for annoyance from construction noise for area residents. The recommended mitigation measures are as follows:

MM-NOI-1 During all project site excavation and grading on site, the project contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers consistent with manufacturers' standards.

MM-NOI-2 The project contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors to the east and southwest of the site.

MM-NOI-3 The construction contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receptors to the east and southwest of the site during all project construction.

MM-NOI-4 During all project site construction, the construction contractor shall limit all construction-related activities that would result in high noise levels to between the hours of 7:00 a.m. and 5:30 p.m. Monday through Friday, and between 8:00 a.m. and 5:00 p.m. Saturday. No construction shall be allowed on Sundays and public holidays.

7 NASEM (National Academies of Sciences Engineering and Medicine). 2022. "NCHRP 25–49 [Final]." https://apps.trb.org/cmsfeed/trbnetprojectdisplay.asp?projectid=3889.

8 *Transit Noise and Vibration Impact Assessment*. Federal Transit Administration Report No. 0123. September 2018.

Long-Term Operational Impacts

Traffic Noise Analysis

Less-than-Significant Impact. The project would result in an increase in traffic along the surrounding roadway network. Based upon the transportation analysis prepared for the proposed project, the project would result in 91 new daily automobile trips, 1 net new daily 2-axle truck trip, 17 net new daily 3-axle truck trips and 43 net new daily 4-or more axle truck trips. On a peak-hour basis, 10 net new passenger vehicle trips, 0 net new 2axle truck trips, 2 3-axle truck trips and 4 net new 4-or more axle truck trips would occur.

Project-related vehicles (particularly trucks) are anticipated to access or exit the project site via Willow Avenue from Valley Boulevard in an easterly direction and then Riverside Avenue in a southerly direction to the I-10 freeway. No noise-sensitive receivers exist along these roadway segments. Based upon available information from another project (Kimley-Horn and Associates 2017), the segment of Valley Boulevard from Lilac Avenue to Riverside Avenue carries an average daily traffic (ADT) volume of 23,525, and the segment of Riverside Avenue from Valley Boulevard to the I-10 has an ADT of 53,916. Thus, the project would result in an addition of well under 1% in vehicular traffic. Because an increase in traffic volumes of 100% would be necessary (all other things being equal) to result in a change in traffic noise levels of 3 decibel (dB), the proposed project would result in an increase of well under 1 dB; this would not be a measurable or audible change in noise levels. Therefore, the proposed project would not create or contribute to a significant traffic-related noise impact, and no mitigation measures would be required with respect to project traffic noise impacts.

On-Site Operational Noise Analysis

Truck loading and unloading, along with slow-moving trucks and forklifts, would result in sound levels of approximately 75 to 80 dBA L_{max} at 50 feet. For the nearest noise sensitive land uses (i.e., 680 feet west and 1,000 feet southwest of the project site) the noise attenuation from distance divergence would be 25 to 30 dBA or more, considering the shielding provided by intervening structures. Sound levels associated with loading/unloading and slow-moving trucks and forklifts in the parking area south of the loading docks would be reduced to below 50 to 55 dBA L_{max}. This range of maximum noise levels is lower than the typical exterior noise standards of 75 dBA L_{max} during the day (7:00 a.m.–10:00 p.m.), would not exceed the 65 dBA L_{max} exterior noise standard during the night (10:00 p.m.–7:00 a.m.), and would be similar to or below maximum sound levels generated by existing sound sources in these areas, such as local vehicle passbys and residential activities. Therefore, on-site operational sounds associated with loading/unloading and slow-moving trucks and forklifts in the parking areas would not result in levels exceeding the daytime noise or nighttime standards at the nearest noise-sensitive land uses approximately 680 and 1,000 feet to the west and southwest.

Consequently, long-term operational sound levels of the proposed warehouse facility would be less than significant upon the proximate existing residential and hotel land uses in the project vicinity, and no mitigation measures would be required with respect to on-site operational noise impacts.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less-Than-Significant Impact. The project does not propose any operational sources of vibration that would be anticipated to be perceived off-site. The main concern associated with ground-borne vibration from construction is the potential for damage to buildings, particularly those that are old or otherwise

fragile. and the project does not propose any high vibration construction activities such as blasting or pile-driving. The primary source of ground-borne vibration occurring as part of the proposed project would be earthwork activities.

According to California Department of Transportation, earthwork activities generate groundborne vibration levels in the range of 0.003 to 0.210 in/sec PPV at a distance of 25 feet.[9] At the nearest residences, located 680 feet to the west, construction vibration levels would be below 0.01 in/sec PPV, which would be well below the Caltrans structural damage thresholds of 0.3 in/sec PPV at residential structures. At the nearest industrial structure, located about 15 feet west of the site, groundborne vibration levels when construction is directly adjacent to this building would range from 0.01 to 0.37 in/sec PPV, which would be below the structural damage thresholds of 0.5 in/sec PPV at industrial buildings. Therefore, impacts associated with ground-borne vibration would be less than significant.

c) ***For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?***

No Impact. The project site is located 11.5 miles east of Ontario International Airport and approximately 9 miles northeast of the Riverside Municipal Airport. The project site is not located within an airport influence area for either of these airports (City of Ontario 2011; County of Riverside 2005). Based on the relatively long distances between the project site and these public airports, the project would not expose people working in the project area to noise generated by either of these airports. Therefore, no impacts associated with public airport noise would occur.

3.14 Population and Housing

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

9 *Transportation- and Construction Vibration Guidance Manual*. California Department of Transportation Division of Environmental Analysis. April 2020.

a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less-Than-Significant Impact. The project would require a temporary construction workforce and a permanent operational workforce, both of which could potentially induce population growth in the project area. The temporary workforce would be needed to construct the proposed warehouse buildings and associated improvements. The number of construction workers needed during any given period would largely depend on the specific stage of construction but will likely average a few dozen workers at any given time throughout the workday. These short-term positions are anticipated to be filled primarily by workers who reside in the project area vicinity. Therefore, construction of the project would not generate a permanent increase in population within the project area.

In terms of operational employees, because the future tenant is not yet known, the number of jobs that the project would generate cannot be precisely determined, but it can be estimated. For purposes of analysis, employment estimates are calculated using average employment density factors reported by SCAG. SCAG reports that for every 1,195 square feet of warehouse space in San Bernardino County, the average numbers of jobs supported is one employee (SCAG 2001). The proposed warehouses would have a combined total of 119,700 square feet, and as such, the estimated number of employees required for operation would be approximately 100 people.

According to the SCAG Demographics and Growth Forecast, employment in the City is anticipated to grow from 25,500 employees in 2016 to 35,500 employees in 2045 (SCAG 2020b). The project-related increase in employment would be minimal in comparison to the anticipated increase in the SCAG Demographics and Growth Forecast.

Additionally, as of December 2021, the California Employment Development Department found that the unemployment rate for Riverside-San Bernardino-Ontario Metropolitan Statistical Area, including the City of Highland, is at 5.1%, which is lower than the state average (6.5%) and higher than the national average (3.9%) for the same period (EDD 2021). Therefore, the project's temporary and permanent employment requirements could likely be met by the City's existing labor force without the need for people to relocate to the project region. The project would not stimulate population growth or a population concentration above what is assumed in local and regional land use plans. Therefore, impacts associated with population growth would be less than significant.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The project site is currently developed with an existing industrial building. There are no existing residential uses on the project site, and the project would not displace any existing housing or population. Therefore, no impacts associated with displacing substantial numbers of existing people or housing would occur.

3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. 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?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

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?

Less-Than-Significant Impact. The Rialto Fire Department (RFD) provides fire protection and emergency response services in the project area. The RFD deploys from four fire stations staffed 24 hours per day by career firefighters and administration. The RFD staffs one battalion chief, four engine companies, one truck company, and four paramedic ambulances each day. On-duty personnel also provide staffing for a Hazardous Materials unit, Urban Search and Rescue unit, a Brush Engine, and an OES type VI engine (City of Rialto 2025b).

The closest fire station to the project area is Fire Station 205 (1485 S Willow Ave), located directly north of the project site. Considering the proximity of the project site to the existing RFD facilities and given the fact that the project site is already located within RFD's service area, the project could be adequately served by the RFD without adversely affecting personnel-to-resident ratios, response times, or other performance objectives.

In addition, the project would not directly or indirectly induce population growth in the City. Although the project could potentially result in a slight, incremental increase in calls for service to the project site in comparison to existing conditions, this increase is expected to be nominal and would not result in the need for new fire protection facilities. Nonetheless, similar to other development projects in the City, the project applicant would be required to pay its fair share of development impact fees to help offset incremental impacts to fire protection services. Therefore, impacts associated with fire protection facilities and response times would be less than significant.

Police protection?

Less-Than-Significant Impact. The Rialto Police Department (RPD) is headquartered at 128 North Willow Avenue, approximately 2 miles north from the project site. RPD has approximately 176 employees and serves 28.5 square miles with a population of over 100,000 people. It offers a variety of services and assignments, including patrol, K-9, crime analysis, Street Crime Attack Team, investigations, traffic enforcement, narcotics, Inland Valley SWAT team, and emergency dispatch (RPD 2025).

The project would not directly or indirectly induce population growth in the City. Although the project would potentially result in a slight, incremental increase in calls for service to the project site compared to existing conditions, this increase is expected to be nominal and would not result in the need for new police protection facilities. In addition, the project site is already located within RPD's service area and would not require an expansion of the service area, which could result in longer response time. It is anticipated that the project would be adequately served by existing RPD facilities, equipment, and personnel. Nonetheless, similar to other development projects in the City, the project applicant would be required to pay its fair share of development impact fees to help offset incremental impacts to police protection services. Therefore, impacts associated with police protection facilities and response times would be less than significant.

Schools?

No Impact. The City is served by three school districts: the Rialto Unified School District, Fontana Unified School District, and Colton Joint Unified School District (City of Rialto 2010). The project site is within the Colton Joint Unified School District, which serves more than 23,000 students over 28 campuses, with 18 elementary schools, 4 middle schools, 3 comprehensive high schools, 2 alternative high school, and one preschool (CJUSD 2017).

Neither the construction nor the operation of the project would generate new permanent residents who would increase student populations. As such, the project would not directly or indirectly induce population growth in the City, and the project would have no effect on the Fontana Unified School District's service abilities.

Nonetheless, all residential and non-residential development projects would be subject to SB 50, which requires payment of mandatory impact fees to offset any impact to school services or facilities. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA or other state or local laws (California Government Code Section 65996). In accordance with SB 50, the project applicant would pay its fair share of impact fees based on project size. These impact fees are required of most residential, commercial, and industrial development projects in the City. Therefore, no impact associated with school facilities would occur.

Parks?

No Impact. The project would not directly or indirectly induce population growth in the City. As such, the project would not generate new permanent residents who would increase the use of existing parks such that substantial physical deterioration of facilities would occur or be accelerated. Regardless, the project would be subject to the state's Quimby Act, which requires development projects to set aside land, donate conservation easements, or pay in-lieu fees for park improvements. Pursuant to the Quimby Act, the applicant would pay its fair share of in-lieu fees based on the type/size of development. These impact fees are required of most residential, commercial, and industrial development projects in the City. Therefore, no impacts associated with park facilities would occur.

Other public facilities?

No Impact. Given the lack of population growth as a result of the project, it is unlikely that the project would increase the use of libraries or other public facilities. Notwithstanding, the project applicant would be required to pay its fair share of development impact fees to help offset incremental impacts to libraries by helping fund capital improvements and expenditures. Therefore, no impacts associated with libraries or other public facilities would occur.

3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. 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?	☐	☐	☐	☒

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?

No Impact. The project would not directly or indirectly induce substantial population growth in the City. Neither construction nor operation of the project would generate new residents to the extent that use of existing parks and recreational facilities would increase and result in the physical deterioration of these facilities. Regardless, the project would be subject to the state's Quimby Act, which requires development projects to set aside land, donate conservation easements, or pay in-lieu fees for park improvements. Pursuant to the Quimby Act, the applicant would pay its fair share of in-lieu fees based on the type/size of development. These impact fees are required of most residential, commercial, and industrial development projects in the City. Therefore, no impacts associated with the increased use of existing recreational facilities would occur.

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?

No Impact. The project would construct two new warehouse buildings and associated improvements. The project does not propose any recreational facilities. As an industrial use, the project would not require the construction or expansion of recreational facilities. Therefore, no impacts associated with the construction of new or expansion of existing recreational facilities would occur.

3.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION – Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☐	☒

This section analyzes the potential impacts of the proposed project based on CEQA Guidelines Section 15064.3(b), which focuses on adopted criteria (vehicle miles traveled [VMT]) for determining the significance of transportation impacts. Pursuant to Senate Bill (SB) 743, the focus of transportation analysis changed from level of service (LOS) or vehicle delay to VMT. The related updates to the CEQA Guidelines required under SB 743 were approved on December 28, 2018. This methodology has been used statewide beginning July 1, 2020. The proposed project is located in the City of Rialto, therefore, for the purposes of this section, the City of Rialto's City of Rialto's Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (City of Rialto 2024), and the Office Governor's Office of Planning and Research's[10] Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR 2018) have been used. The City approved the Transportation Technical Memorandum including the Trip Generation and Vehicle Miles Travel (VMT) Screening Analysis (Revised July 21, 2025) prepared by Dudek which includes the Traffic Scope Approval Form to support the LOS and VMT screening. The approved Transportation Technical Memorandum is attached as Appendix G-1 of this document.

a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less-Than-Significant Impact. The project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, as discussed below.

City of Rialto General Plan Circulation Element

The General Plan Circulation Element outlines the City's goals and implementation policies to provide a safe and efficient transportation system strategy. A focused update was adopted to the City's General Plan

[10] Effective July 1, 2024, the Governor's Office of Planning and Research was renamed the Governor's Office of Land Use and Climate Innovation (LCI).

in 2023 which included updates to the Circulation Element as well (City of Rialto 2023c). The project would be accessed via project driveways along Willow Avenue and Valley Boulevard and parking would be provided entirely on site. Project generated traffic would travel along major arterial roadways and existing freeway interchanges with I-10 to access the site such as West Valley Boulevard, South Riverside Avenue and Cedar Avenue. Most of these roadways are also City-designated truck routes. Travel on residential streets is not anticipated. As shown in the Traffic Scope Approval Form, an LOS analysis would not be required due to the relatively low trip generation rate of the project, and specifically during peak-hour traffic (see Table 3.17-1), which is presumed not to have a measurable effect on LOS. Therefore, the project would not conflict with the LOS standards set forth in the Circulation Element of the City's General Plan. The project would construct frontage landscape and pedestrian improvements. Therefore, the project would not conflict with applicable policies in the City's Circulation Element.

Truck Route

As part of the focused General Plan Update, the City conducted a truck route study to analyze the existing truck routes, evaluate new truck routes, and utilize city policies including current state and local truck regulations that are consistent with the California Vehicle Code (CVC), to provide recommended truck routes. Based on City of Rialto 2022 Citywide Truck Routing Study (City of Rialto 2022c) the City's decommissioned and final truck routes were established. Near the proposed project, Valley Boulevard within the City's boundary and Riverside Avenue, south of Valley Boulevard are designated truck routes. The project trucks will utilize the City-designated truck route on Valley Boulevard and Riverside Avenue. Dudek prepared a Site Operations and Truck Routing Plan for the project, which was submitted to the City in January 2025 and is attached as Appendix G-2.

Transit, Bicycle, and Pedestrian Facilities

The project site is served by passenger rail and bus services. The Rialto Metrolink Station, located approximately 1.7 miles north of the project site, would serve as the nearest Metrolink station serving the San Bernardino Line. Omnitrans Routes 19 and 22 are the closest bus routes to the project site, with stops along West San Bernardino Avenue and South Riverside Avenue, respectively. The San Bernardino at Willow Avenue bus stop serves Route 19 and is located approximately 0.3-mile to the north of the project site. The Riverside at Valley Boulevard bus stop serves Route 22 and is located approximately 0.2 mile to the east of the project site. Project construction would not require the temporary or permanent relocation of bus stops nor interfere with the existing services. Therefore, development of the project would not conflict with the existing bus routes or bus stops. Impacts to transit would be less than significant.

There are no existing bicycle facilities adjacent to the proposed project along Valley Boulevard or Riverside Avenue. Per Rialto Active Transportation Plan (March 2020), the proposed facilities in the vicinity of the project include Class II/III facilities along Riverside Avenue; Class II Bike lanes along Valley Boulevard and San Bernadino Avenue and Class III bike route along Willow Avenue, within the City limits. While the project does not involve any plans to construct any bicycle lane facilities, the project's design would ensure that these facilities can be readily developed when the City commences implementation of those projects. Moreover, the project would provide street and frontage improvements and access to the site would be facilitated for both pedestrian and bicycle users in the overall area; therefore, the project would not conflict with any plans or policies regarding existing or proposed bicycle and pedestrian facilities in the study area.

Based on analysis provided above, the project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and its impact to transportation plans and programs would be less than significant.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less-Than-Significant Impact. The City has adopted the VMT metric and significance criteria for transportation impact analyses for CEQA compliance. CEQA Guidelines Section 15064.3 states that "generally, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts," and define VMT as "the amount and distance of automobile travel attributable to a project." Note that "automobile" refers to on-road passenger vehicles, specifically cars and light trucks. Heavy-duty truck VMT does not need to be included in the analysis per SB 743 requirements. Other relevant considerations may include the effects of the project on transit and non-motorized traveled.

The OPR's Technical Advisory suggests that agencies may screen out VMT impacts using project size, maps, transit availability, and provision of affordable housing. The guidance recommended by OPR has been used by the City to be better suited to the local and sub-area conditions of Rialto within the San Bernardino County. The proposed project would be screened out using the City's low VMT area criterion for screening, as discussed below.

Per Office of Planning and Research's Technical Advisory (OPR 2018) and City of Rialto's TIA Guidelines, if a project generates less than 110 daily trips (from passenger vehicles), it can be screened out from conducting a VMT analysis, using the Small Project Screening criteria.

The proposed project would replace the existing warehouse on the project site; therefore, trip generation was estimated for the net new proposed use of approximately 88,902 SF[11] of warehouse use. Because the existing uses are currently operational, an existing use trip credit was applied to estimate the project's net new trip generation. Using the Institute of Transportation Engineer Trip Manual, 11th Edition, as shown in Table 3.17-1, the proposed project would generate approximately 152 net new daily trips, or 91 net new daily passenger vehicle trips, therefore, can be potentially screened out using the Small Project Screening criteria when applied to net new daily trips. However, because the proposed project generates 152 daily trips under the proposed conditions, it doesn't adequately meet the threshold of 110 daily trips or less to use Small Project Screening criteria.

Table 3.17-1. Project Trip Generation Summary

Land Use	Daily Trip Rate/ Unit	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total

[11] Within Appendix C, the Transportation Technical Memorandum and the trip generation estimates correspond to a higher square footage for the proposed project in the analysis compared to the currently proposed square footage per the latest site plan shown in Figure 2-6. As shown in Figure 2-6, the current Site Plan proposes a total of 119,968 SF and net new 86,968 SF. Therefore, the analysis included in the approved Transportation Technical Memorandum and the Traffic Scoping Form (Appendix G-1) is conservative.

Table 3.17-1. Project Trip Generation Summary

Trip Rates and Trip Generation									
Warehousing[1] (ITE Code 150)	1.71/TSF		0.13	0.04	0.17	0.05	0.13	0.18
Land Use	**Units**	**Daily**	**In**	**Out**	**Total**	**In**	**Out**	**Total**
Proposed	121.902 TSF	208	16	5	21	6	16	22
Existing	33.000 TSF	56	4	2	6	2	4	6
Net New	88.902 TSF	152	12	3	15	4	12	16

Land Use	Vehicle Classification (%)	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Net New Trip Generation								
Vehicle Mix[2] and Non PCE Trips (88.902 TSF)	**Passenger Cars (60.0%)**	**91**	**7**	**2**	**9**	**3**	**7**	**10**
	2-axle Trucks (0.8%)	1	0	0	0	0	0	0
	3-axle Trucks (11.2%)	17	1	0	2	1	0	2
	4+axle Trucks (28.0%)	43	3	1	4	2	2	4
	Non PCE Trips	**152**	**12**	**3**	**15**	**4**	**12**	**16**
Passenger-Car Equivalence (PCE)								
PCE Factors[3] and PCE Trips (88.902 TSF)	Passenger Cars (1.0 PCE)	91	7	2	10	3	7	10
	2-axle Trucks (1.5 PCE)	2	0	0	0	0	0	0
	3-axle Trucks (2.0 PCE)	34	2	0	2	2	0	2
	4+axle Trucks (3.0 PCE)	128	9	3	12	5	7	12
	Total PCE Trips	**255**	**18**	**5**	**23**	**10**	**14**	**24**

Notes: TSF = Thousand Square Feet, PCE = Passenger Car Equivalent
Some of the totals may not match exactly due to rounding.

1 Trip rates from the Institute of Transportation Engineers, Trip Generation, 11th Edition, 2021. Land Use Code 150 – Warehousing (ITE 2021).

2 Per City of Rialto's TIA Guidelines (October 2021), 40% of the daily trips are truck trips (per AQMD staff recommendation included in CalEEMod v. 2013.2 Appendix E Technical Source Documentation, Fleet Mix) for warehousing uses i.e., ITE Code 150. The vehicle mix for trucks i.e., 2-axle, 3-axle, and 4+ axle trucks are per current measured rates in the City and provided in the draft TIA guidelines.

3 Passenger Car Equivalent (PCE) factors are assumed to be 1.0 for passenger vehicles, 1.5 and 2.0 for 2-axle and 3-axle trucks, and 3.0 for 4-axle trucks per City of Rialto TIA Guidelines (October 2021)

Per City's TIA guidelines, residential and office projects located within a low VMT-generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary. In addition, other employment-related and mixed-use land use projects may qualify for the use of screening if the project can reasonably be expected to generate VMT per capita or per employee that is consistent with the existing land uses in that low VMT generating area. The City's guidelines recommend using production-attraction (PA) VMT when there is a need to isolate home-based work VMT for the purposes of isolating commute VMT. Because the project is primarily an employment-based use, it is acceptable to use PA VMT for determining the project's VMT screening using the SBCTA VMT Evaluation Tool. The project is consistent with existing industrial land uses in its vicinity and is therefore consistent with VMT analysis provided by the tool.

As shown in Table 3.17-2. Project VMT Summary, the jurisdiction baseline PA VMT per worker is 16.9 and the threshold is 16.9 or below. It should be noted that the recommended threshold for the County is 32.7

VMT per service employee. Service population is a total of residents and employees or workers in a zone. The project's service population consists of only workers; therefore, the project's PA VMT per worker if compared to the threshold of VMT per service population would be significantly lower. As the proposed project would not exceed the PA VMT baseline of 16.9 and would be significantly below 32.7 VMT per service population, it would be screened out using the SBCTA VMT Evaluation tool. The project's VMT would result in a less than significant impact.

Table 3.17-2. Project VMT Summary

Criteria	VMT per Worker
Jurisdiction (Baseline) VMT	16.9 PA VMT per Worker
VMT Threshold (below Baseline)	16.9 PA VMT per Worker
TAZ VMT (Project VMT)	16.9 PA VMT per Worker
Project VMT Impact	Less than Significant

Source: Attachment D
Notes: VMT = vehicle miles traveled, TAZ = Traffic Analysis Zone

Per City's TIA Guidelines (City of Rialto 2024) and for purposes of compliance with Senate Bill 743, a detailed VMT analysis is not required for the proposed project. The project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b). Impacts would be less than significant.

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less-Than-Significant Impact. The project would not include construction of any new roadways, modifications to any existing roadway or intersection geometry, or temporary road closures during construction. Project access driveways would be constructed along Willow Avenue and Valley Boulevard per City's design standards to ensure that the project does not introduce hazardous design feature. The project would be compatible with the surrounding industrial land uses and therefore would not result in increased hazards due to introduction of an incompatible use. Impacts would be less than significant.

d) Would the project result in inadequate emergency access?

No Impact. Access to the project site would be provided by four driveways: three driveways on Willow Avenue and one driveway on West Valley Boulevard. These project driveways would be constructed according to City's design standards and reviewed by the City engineer. Similarly, the parking areas and internal drive aisles have been designed to comply with width, clearance, and turning-radius requirements set forth by the City and fire code requirements, which would ensure that all areas on the project site would be accessible to emergency responders during project construction and operation. Therefore, no impacts associated with emergency access would occur.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☐	☒
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

No Impact. A tribal cultural resource (TCR) is defined in Public Resources Code Section 21074 as a site, feature, place, cultural landscape, sacred place, or object that is of cultural value to a California Native American tribe and is either listed or eligible for listing in the California Register of Historical Resources (CRHR) or in a local register of historical resources.

As discussed in Section 3.5, Cultural Resources, no tribal cultural resources listed or eligible for listing in the CRHR or in a local register of historical resources have been identified within the proposed project site (Appendix C). A records search conducted at the SCCIC indicated that 25 previous cultural resources investigations were completed within one mile of the project site between 1984 and 2015, and no previously recorded cultural resources are located within or adjacent to the project site. Therefore, implementation of the proposed project would not result in a substantial adverse change in the significance

of a tribal cultural resource listed or eligible for listing in the CRHR or a local register of historical resources. No impact would occur.

b) ***A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

Less-Than-Significant Impact With Mitigation Incorporated. In accordance with Assembly Bill 52 (AB 52) and Senate Bill 18 (SB 18), the City provided notification to California Native American tribes traditionally and culturally affiliated with the project area to initiate consultation regarding potential impacts to TCRs. On July 18, 2022, notification letters were sent to the following tribes: Gabrieleño Tongva Indians of California Tribal Council, Soboba Band of Luiseno Indians, Agua Caliente Band of Cahuilla Indians, Gabrieleño/Tongva San Gabriel Band of Mission Indians, Gabrieleño/Tongva Nation, Gabrielino-Tongva Tribe, Gabrieleño Band of Mission Indians - Kizh Nation, Morongo Band of Mission Indians, Quechan Tribe of Fort Yuma Reservation, Yuhaaviatam of San Manuel Nation (formerly known as the San Manuel Band of Mission Indians), Santa Rosa Band of Cahuilla Indians, and Serrano Nation of Mission Indians.

Responses were received from the Gabrieleño Band of Mission Indians – Kizh Nation, Yuhaaviatam of San Manuel Nation, and the Morongo Band of Mission Indians. These tribes requested the incorporation of specific mitigation measures to address the potential discovery of TCRs and human remains during ground-disturbing activities. Although no known TCRs have been identified within the project site, ground-disturbing activities associated with the proposed project have the potential to encounter previously unknown TCRs or human remains.

The Project would be subject to compliance with **MM CUL-2, MM CUL-3,** and **MM CUL-5**, which requires the preparation of a Cultural Resources Management plan to be approved by the consulting tribes, a cultural resource sensitivity training, and in the event a cultural resources is discovered, work shall cease within a 60-foot buffer and if the resources is Native American in origin, the consulting tribes shall be contacted regarding potential significance and treatment of the resource outlined in **MM TCR-2**. The Project would also be subject to compliance with **MM TCR-1** which requires the retention on a Native American Monitor approved by the Consulting Tribes, **MM TCR-2** which outlines the protocol for Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial), including compliance with the Cultural Resource Management plan outlined in **MM CUL-2** and coordination with the Consulting Tribes, and **MM TCR-3** which outlines the protocol for Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects.

MM-TCR-1: Retain a Native American Monitor Prior to Commencement of Ground Disturbing Activities . The project applicant shall retain a Native American Monitor from or approved by the Consulting Tribes. The monitor shall be retained prior to the commencement of any ground-disturbing activity for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. A copy of the executed monitoring agreement shall be submitted to the City of Rialto prior to the commencement of any ground-disturbing

activity, or the issuance of any permit necessary to commence a ground-disturbing activity. The agreement would also address the consideration of rotating monitoring between Consulting Tribes. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Consulting Tribes. Monitor logs will identify and describe any discovered tribal cultural resources (TCRs), including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/ City of Rialto upon written request to the Consulting Tribes. On-site tribal monitoring shall conclude upon the latter of the following: (1) written confirmation to the Consulting Tribes from a designated point of contact for the project applicant that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Consulting Tribes to the project applicant that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact TCRs.

MM-TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial). Upon discovery of any tribal cultural resources (TCRs), all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 60 feet) and shall not resume until the discovered TCR has been fully assessed by the Native American Monitor (pursuant to **Mitigation Measure [MM] CUL-5**). The Consulting Tribes will recover and retain all discovered TCRs in the form and/or manner the Consulting Tribes deem appropriate and for any purpose the Consulting Tribes deem appropriate, including for educational, cultural and/or historic purposes. Should the find be deemed significant, as defined by CEQA, the find shall be addressed to the protocols outlined in the Cultural Resources Management Plan from **MM CUL-2**.

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

a) Native American human remains are defined in Public Resources Code Section 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.
b) If Native American human remains and/or grave goods are discovered or recognized on the project site, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.
c) Human remains and grave/burial goods shall be treated alike per California Public Resources Code Section 5097.98(d)(1) and (2).
d) Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.

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

Therefore, compliance with the established regulatory framework and the mitigation measures outlined above would reduce potential impacts to tribal cultural resources to a less than significant level. Therefore, impacts would be less than significant with mitigation incorporated.

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider 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?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less-Than-Significant Impact. The proposed project involves the demolition of the current building on site and construction of two warehouse buildings, as well as paved parking areas and landscape areas. The

project site currently consists of similar uses, along with vacant land in the northern portion of the site. As such, the proposed project would increase demand for water supply compared to existing land uses.

As part of the project, utility service lines, including those for water, wastewater, stormwater drainage, electric power, natural gas, and telecommunications services, would be extended from their current locations in the public ROW surrounding the project site for operation of the proposed warehouse buildings. The current uses on the site are connected to these utility service lines, but the northern portion of the site is currently undeveloped.

Given that the activity of connecting utilities from their current locations within the public right-of-way would require ground disturbance and the use of heavy machinery associated with trenching, the connection of these utility services to the proposed warehouse buildings could potentially result in environmental effects. However, the extension of these utility lines is part of the proposed project analyzed herein. As such, any potential environmental impacts related to these components of the project are already accounted for in this IS/MND as part of the impact assessment conducted for the entirety of the project. No adverse physical effects beyond those already disclosed in this IS/MND would occur as a result of implementation of the project's utility system connections. Additionally, the project would constitute a nominal increase in utility usage, which has already been accounted for in growth projections for the City and by each utility provider. No modifications to utility infrastructure would be necessary outside of the immediate project area. As such, impacts associated with the construction or expansion of utility line connections would be less than significant.

b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less-Than-Significant Impact. Domestic water would be provided to the project site by Rialto Public Works Department Water Division. Water service is provided for single-family, multiple-family, commercial, light industrial, governmental, and landscaping purposes.

The primary water source for Rialto is groundwater from four different groundwater basins (City of Rialto 2021b). The Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan contains existing and projected water supplies and demands for the region, including the Rialto Public Works Department Water Division. Table 3.19-1 shows projected water supplies during single- and multiple-dry year conditions, which represents "worst-case" conditions during extended periods of drought when supplies would be reduced.

Table 3.19-1. Projected Multiple Dry Year Supply and Demand Comparison (Acre-Feet)

Multiple Dry Year Scenario	2025	2030	2035	2040	2045
First Year					
Supply Totals	12,147	12,922	13,696	14,194	14,691
Demand Totals	10,563	11,236	11,910	12,342	12,775
Difference (supply minus demand)	**1,584**	**1,685**	**1,786**	**1,851**	**1,916**
Second Year					
Supply Totals	12,147	12,922	13,696	14,194	14,691
Demand Totals	10,563	11,236	11,910	12,342	12,775

Table 3.19-1. Projected Multiple Dry Year Supply and Demand Comparison (Acre-Feet)

Multiple Dry Year Scenario	2025	2030	2035	2040	2045
Difference (supply minus demand)	**1,584**	**1,685**	**1,786**	**1,851**	**1,916**
Third Year					
Supply Totals	12,147	12,922	13,696	14,194	14,691
Demand Totals	10,563	11,236	11,910	12,342	12,775
Difference (supply minus demand)	**1,584**	**1,685**	**1,786**	**1,851**	**1,916**
Fourth Year					
Supply Totals	12,147	12,922	13,696	14,194	14,691
Demand Totals	10,563	11,236	11,910	12,342	12,775
Difference (supply minus demand)	**1,584**	**1,685**	**1,786**	**1,851**	**1,916**
Fifth Year					
Supply Totals	12,147	12,922	13,696	14,194	14,691
Demand Totals	10,563	11,236	11,910	12,342	12,775
Difference (supply minus demand)	**1,584**	**1,685**	**1,786**	**1,851**	**1,916**

Source: City of Rialto 2021b.

Table 3.19-1 demonstrates that the City anticipates adequate supplies for years 2025 to 2045 under multiple-dry year conditions based on current land use projections. However, in the unlikely event of a drought, natural disaster such as earthquake, a regional power outage, the Rialto Urban Water Management Plan has prepared a water shortage contingency plan for the region (City of Rialto 2021b). This plan provides specific actions that should be taken to ensure critical water needs of the region are met during a period in which water supplies are cut by 50%. Based on the future and existing capacity, and water management measures, it is anticipated there are sufficient water supplies to serve the proposed project. Therefore, impacts associated with water supplies would be less than significant.

c) ***Would the project result in a 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?***

Less-Than-Significant Impact. Under existing conditions, the project site is developed with a building and contributes to the overall wastewater generated within the City. As noted above in Section 3.11(b), the proposed project is consistent with the existing zoning designation established by the City. As such, anticipated wastewater generation for an industrial use has already been accounted for in growth projections for the City. Existing infrastructure is adequate to convey wastewater without requiring the expansion of the facilities. In addition, the project site wastewater conveyance and treatment. Therefore, impacts associated with wastewater capacities would be less than significant.

d) ***Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?***

Less-Than-Significant Impact. Solid waste generated in the City is collected and transported by the City's contract waste hauler, Burrtec Waste Industries (City of Rialto 2025c). Once collected, solid waste is transported to sorting/disposal facilities permitted to accept residential and commercial solid waste, with

each facility's operations routinely inspected by regional and state regulatory agencies for compliance with all applicable statutes and regulations. Burrtec operates five material recovery facilities in Southern California, which sort and process recyclables; the remaining waste is then taken to the nearby Salton City Landfill (Burrtec Waste Industries 2025).

The California Department of Resources Recycling and Recovery (CalRecycle) publishes solid waste generation rates based on land use types. According to CalRecycle, manufacturing/warehouse uses generate 1.42 pounds per 100 square feet per day (CalRecycle 2025a). Based on these generation rates, construction of the proposed 119,700-square-foot warehouse facility could generate solid waste at a rate of approximately 1,700 pounds of solid waste per day.[12]

The Salton City Landfill currently has a maximum permitted throughput of 6,000 tons per day and a remaining capacity of 62,540,915 cubic yards (CalRecycle 2025b). As a result, solid waste generated by the project would represent only a nominal percentage of the collective maximum daily throughput permitted for this landfill; therefore, impacts associated with permitted landfill capacity would be less than significant.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less-Than-Significant Impact. All collection, transportation, and disposal of solid waste generated by the project would comply with all applicable federal, state, and local statutes and regulations. Under AB 939, the Integrated Waste Management Act of 1989, local jurisdictions are required to develop source reduction, reuse, recycling, and composting programs to reduce the amount of solid waste entering landfills. Local jurisdictions are mandated to divert at least 50% of their solid waste generation into recycling. The project would be required to submit plans to the Public Works Department for review and approval to ensure the plan would comply with AB 939.

In addition, the state has set a goal of 75% recycling, composting, and source reduction of solid waste by 2020. To help reach this goal, the state adopted AB 341 and AB 1826. AB 341 is a mandatory commercial recycling bill, and AB 1826 is mandatory organic recycling. Waste generated by the project would enter the City's waste stream but would not adversely affect the City's ability to meet AB 939, AB 341, or AB 1826, since the project's waste generation would represent a nominal percentage of the waste created within the City. Therefore, impacts associated with solid waste disposal regulations would be less than significant.

[12] This estimate does not account for diversion of recyclables from the solid waste stream and, thus, should be considered a conservative projection.

3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less-Than-Significant Impact. There are several primary corridors throughout the City that may be used for an evacuation, including N. Riverside Avenue, W. Baseline Road, W. Rialto Avenue, and U.S. Route 66, among others included in Exhibit 5.11, Evacuation Route Corridors, in the City of Rialto General Plan Safety and Noise Element Update (City of Rialto 2023). Vehicle access to the project site would be provided via S Willow Street and W Valley Boulevard. Valley Boulevard is classified as a major highway in the Gateway Specific Plan (City of Rialto 1990). Valley Boulevard provides direct regional access to I-10, located to the south of the project site; thus, this street could serve as emergency evacuation routes for the project area. The project would not include any project-adjacent, off-site improvements within these abutting roadways that would impede response or evacuation activities in the event of an emergency; therefore, impacts associated with emergency response and evacuation routes would be less than significant.

b) Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. According to CAL FIRE's 2025 Updated Fire Hazard Severity Zones, the project site is not located in an area identified as being susceptible to wildland fire (CAL FIRE 2025). In addition, the City of

Rialto General Plan Safety and Noise Element Update, Exhibit 5.9, Fire Hazards, does not identify the project site as being located in a fire hazards severity zone (City of Rialto 2023). Further, the project site is relatively flat and contains only limited amounts of ornamental vegetation associated with existing landscaping and does not contain extensive amounts of vegetation or wildfire fuel. Therefore, it is not anticipated that the project, due to slope, prevailing winds, and other factors, would exacerbate wildfire risks or expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Thus, the project would not expose people or structures to significant risk involving wildfires, exacerbate wildfire risks, or otherwise result in wildfire-related impacts. Therefore, no impacts associated with wildfire would occur.

c) Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. According to CAL FIRE's 2025 Updated Fire Hazard Severity Zones, the project site is not located in an area identified as being susceptible to wildland fire (CAL FIRE 2025). In addition, the City of Rialto General Plan Safety and Noise Element Update, Exhibit 5.9, Fire Hazards, does not identify the project site as being located in a fire hazards severity zone (City of Rialto 2023). The project would construct surface parking lots, new internal circulation roadways, and infrastructure for the proposed development. It is not anticipated that installation or maintenance of internal driveways would exacerbate fire risk, as the driveways would be surrounded by developed land. Further, the project site is in a predominantly developed area and would connect to existing utilities. The project would not require installation or maintenance of other associated infrastructure such as fuel breaks, power lines, or other utilities that would exacerbate fire risk. As such, the project would not expose people or structures to significant risk involving wildland fires, exacerbate wildfire risks, or otherwise result in wildfire-related impacts. Therefore, no impacts associated with wildfire would occur.

d) Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. According to CAL FIRE's 2025 Updated Fire Hazard Severity Zones, the project site is not located in an area identified as being susceptible to wildland fire (CAL FIRE 2025). In addition, the City of Rialto General Plan Safety and Noise Element Update, Exhibit 5.9, Fire Hazards, does not identify the project site as being located in a fire hazards severity zone (City of Rialto 2023). As discussed in Section 3.7, Geology and Soils, and Section 3.10, Hydrology and Water Quality, the project would not result in significant risks associated with flooding, landslides, runoff, or drainage changes, and the project does not propose the use of fire (such as for a controlled vegetation burn) that would result in post-fire instability. Further, the project site is located within a developed portion of the City that is not susceptible to wildland fires, given its considerable distance from open, natural areas. Thus, the project would not expose people or structures to significant risk involving wildland fires, exacerbate wildfire risks, or otherwise result in wildfire-related impacts. Therefore, no impacts with wildfire would occur.

3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially 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, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
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?	☐	☒	☐	☐

a) ***Does the project have the potential to substantially 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, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?***

Less-Than-Significant Impact With Mitigation Incorporated. As described throughout this IS/MND, with the incorporation of the identified mitigation measures, the project would not degrade the quality of the environment; would not substantially reduce the habitats of fish or wildlife species; would not cause a fish or wildlife population to drop below self-sustaining levels; would not threaten to eliminate a plant or animal; and would not eliminate important examples of major periods of California history or prehistory. Therefore, impacts would be less than significant with mitigation incorporated.

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.)

Less-Than-Significant Impact With Mitigation Incorporated. When evaluating cumulative impacts, it is important to remain consistent with Section 15064(h) of the CEQA Guidelines, which states that an EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

Alternatively, a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable through mitigation measures set forth in an MND or if the project will comply with the requirements in a previously approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located.

The proposed project may potentially result in project-related biological, cultural, and tribal cultural impacts that could be potentially significant without the incorporation of mitigation. Thus, when coupled with biological, cultural, and tribal cultural impacts related to the implementation of other related projects throughout the broader project area, the project would potentially result in cumulative-level impacts if these significant impacts are left unmitigated.

However, with the incorporation of mitigation identified herein, the project's impacts to biological resources, cultural resources, and tribal cultural resources would be reduced to less-than-significant levels and would not considerably contribute to cumulative impacts in the greater project region. In addition, these other related projects would presumably be bound by their applicable lead agency to (1) comply with all applicable federal, state, and local regulatory requirements; and (2) incorporate all feasible mitigation measures, consistent with CEQA, to further ensure that their potentially cumulative impacts would be reduced to less-than-significant levels.

Although cumulative impacts are always possible, the project, by incorporating all mitigation measures outlined herein, would reduce its contribution to any such cumulative impacts to less than cumulatively considerable; therefore, the project would result in individually limited, but not cumulatively considerable, less-than-significant impacts with mitigation incorporated.

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

Less-Than-Significant Impact With Mitigation Incorporated. As evaluated throughout this IS/MND, with incorporation of mitigation identified herein, all environmental impacts associated with the project would be reduced to less-than-significant levels. Thus, the project would not directly or indirectly cause substantial adverse effects on human beings. Impacts would be less than significant with mitigation incorporated.

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4 References and Preparers

4.1 References Cited

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4.2 List of Preparers

Dudek

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Rachel Swick – Biologist
Kimberly Narel – Biologist
Sabita Tewani – Transportation Specialist
Andrew Greis – GIS Specialist
Hannah Wertheimer-Roberts – Technical Editor

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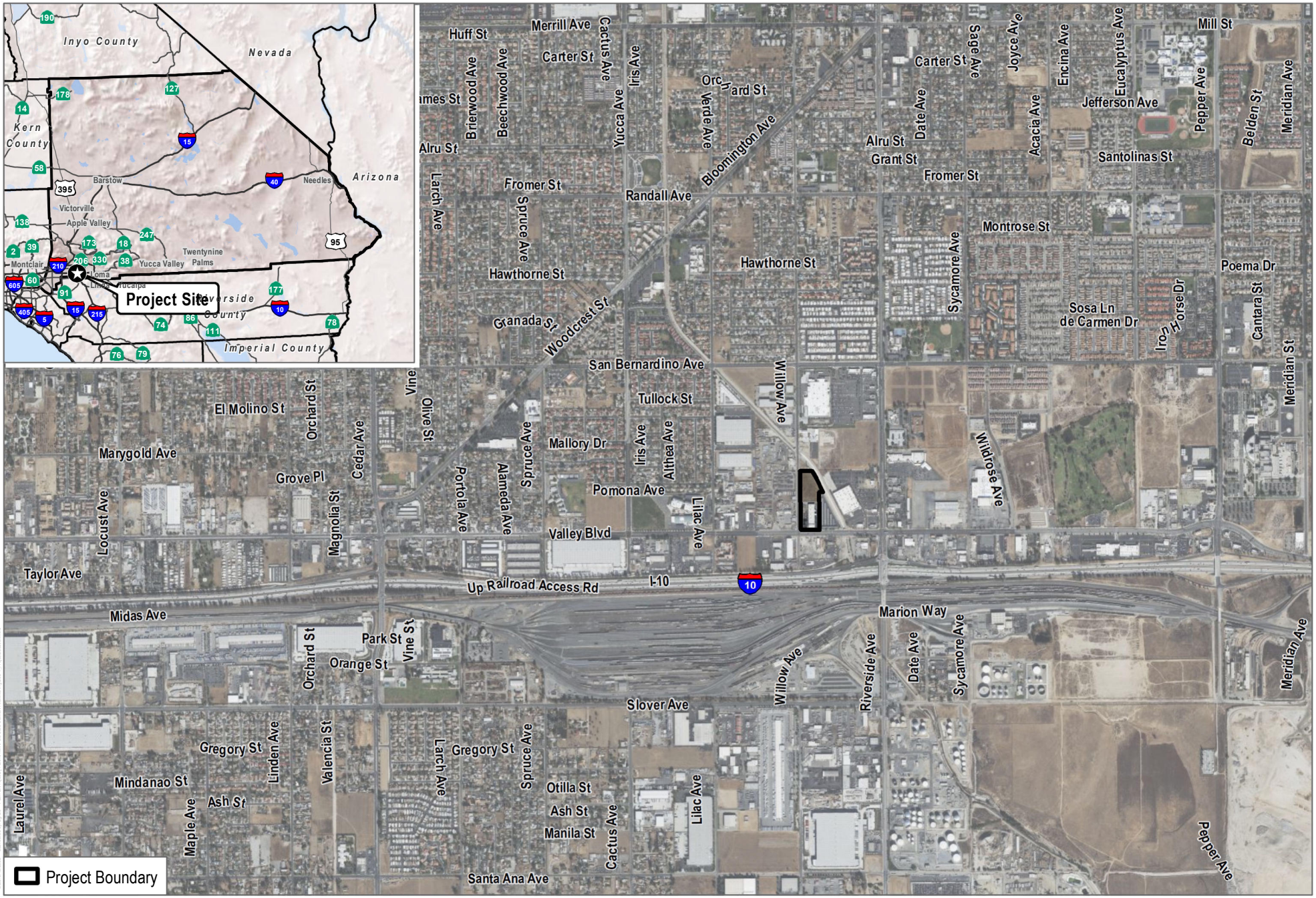

SOURCE: County of San Bernardino; Bing Maps

DUDEK

0 1,000 2,000 Feet

FIGURE 2-1

Project Location

IBG Willow and Valley Rialto Warehouses

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SOURCE: County of San Bernardino; Bing Maps

DUDEK

0 100 200 Feet

FIGURE 2-2

Aerial Overview

IBG Willow and Valley Rialto Warehouses

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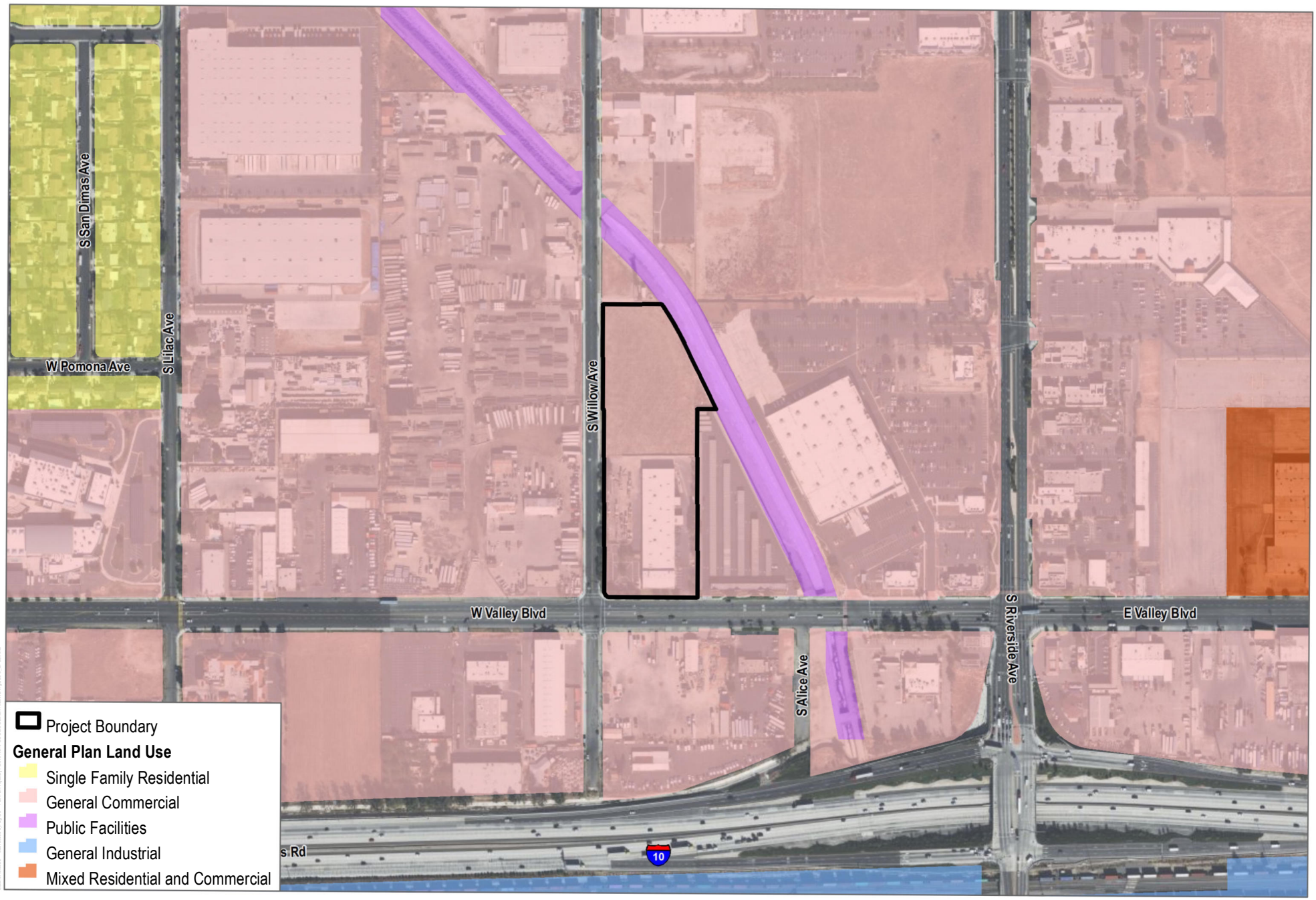

SOURCE: SCAG 2012; County of San Bernardino; Bing Maps

DUDEK

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FIGURE 2-3

General Plan Land Use

IBG Willow and Valley Rialto Warehouses

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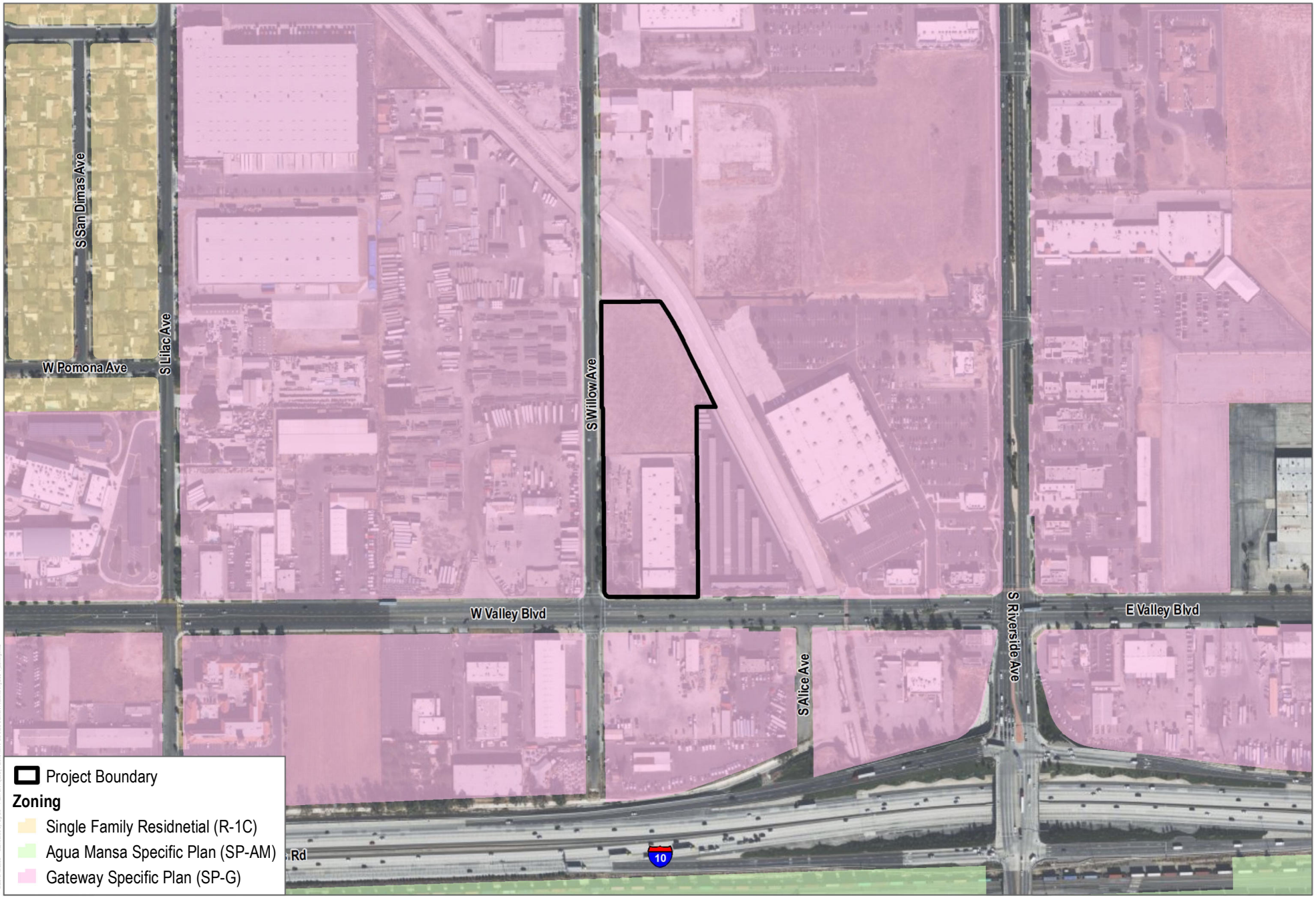

SOURCE: SCAG 2012; County of San Bernardino; Bing Maps

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FIGURE 2-4

Zoning

IBG Willow and Valley Rialto Warehouses

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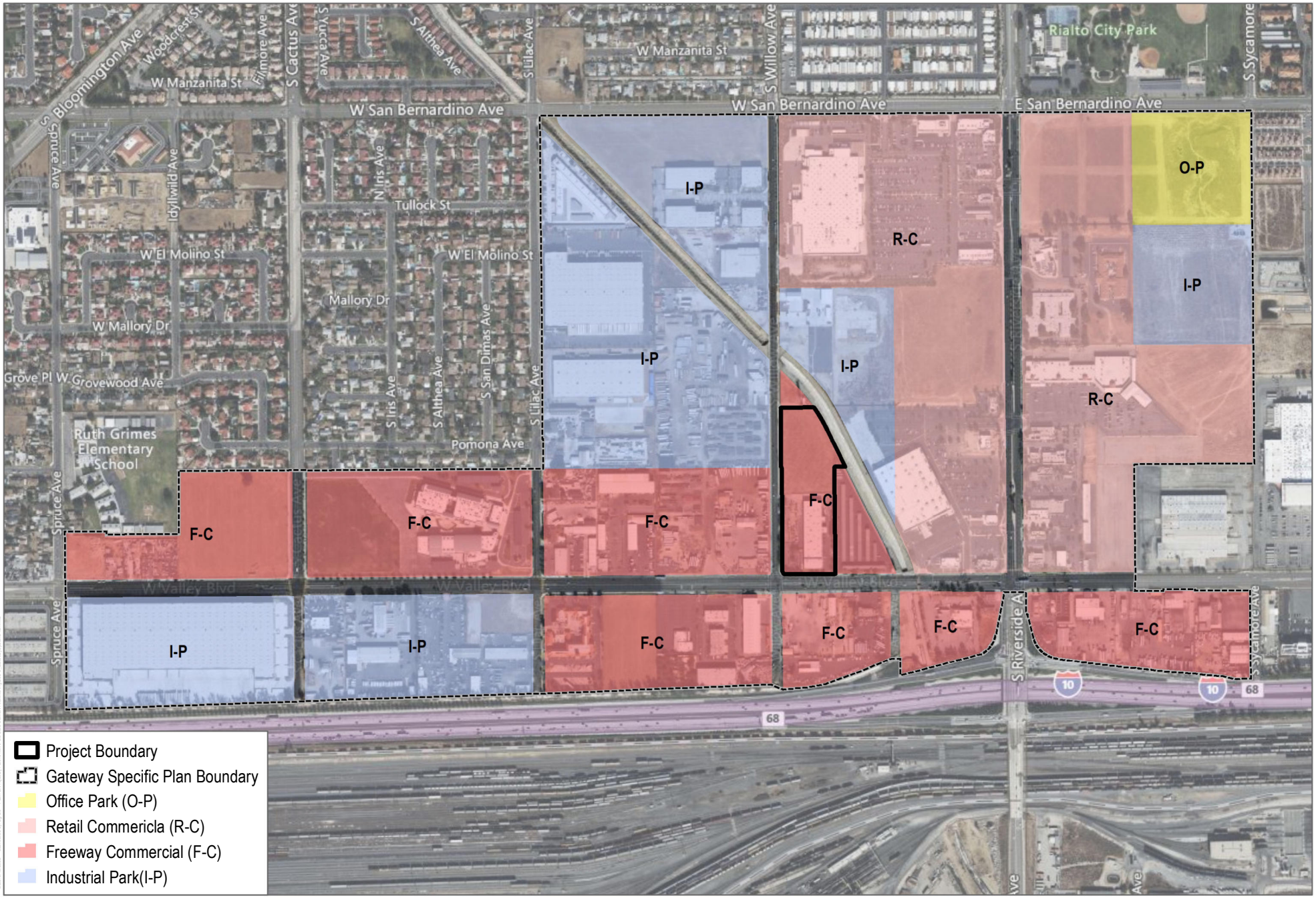

SOURCE: City of Rialto; County of San Bernardino; Bing Maps

DUDEK

0 500 1,000 Feet

FIGURE 2-5

Gateway Specific Plan

IBG Willow and Valley Rialto Warehouses

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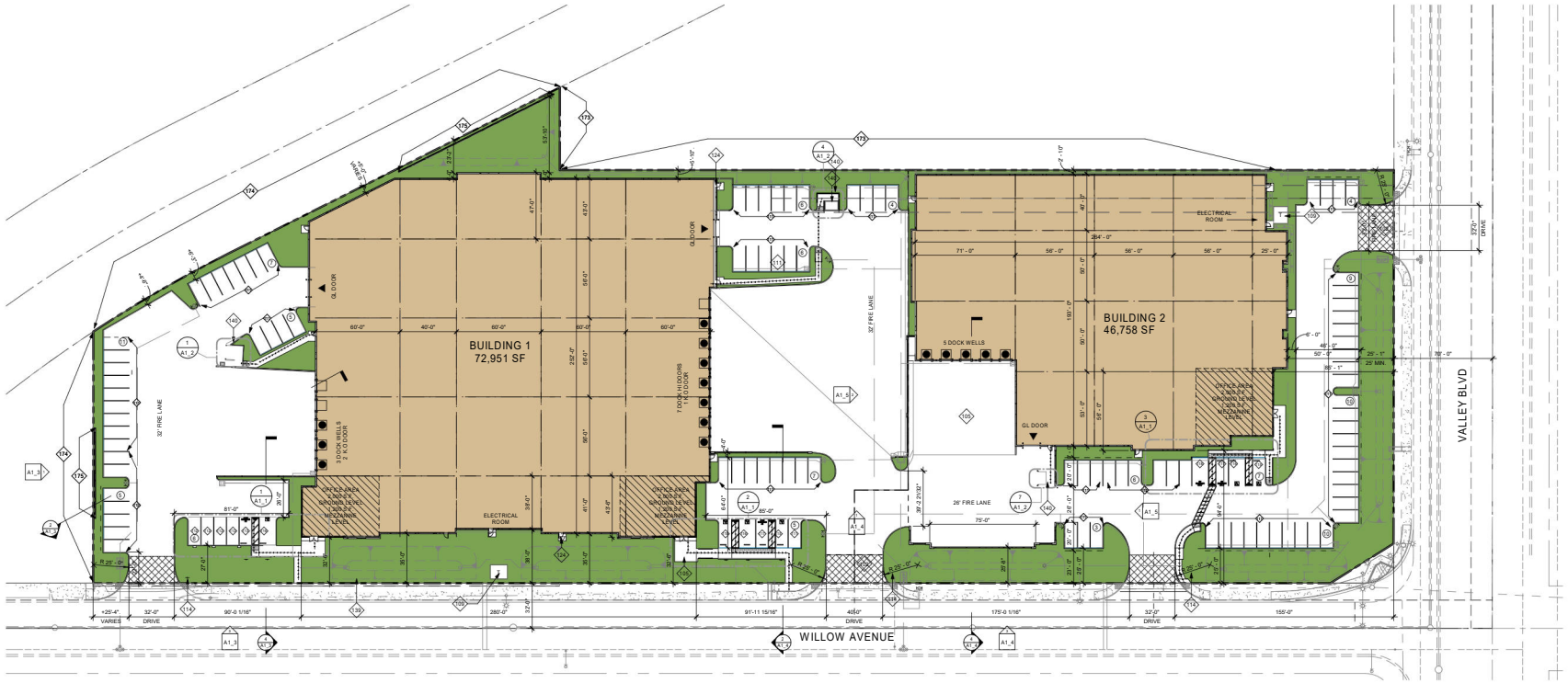

1 PROPOSED SITE PLAN
1" = 30'-0"

IBG VALLEY BLVD
RIALTO, CA

PROJECT
3RD PLANNING SUBMITTAL

DEVELOPER/OWNER

ADDRESS: INVESTING BUILDING GROUP
CONTACT: BRIAN BARGEMANN
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APPLICANT'S REPRESENTATIVE/ARCHITECT

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SCOPE OF WORK

CONSTRUCT TWO NEW ONE STORY + MEZZANINE CONCRETE TILT-UP WAREHOUSE/DISTRIBUTION FACILITIES WITH ELECTRICAL AND PLUMBING SERVICES, EXTERIOR LIGHTING, LANDSCAPING & IRRIGATION, TRASH ENCLOSURES, CONCRETE SCREEN WALLS, FIRE SPRINKLER AND GRADING PLANS TO BE A SEPARATE SUBMITTAL AND PERMIT

LEGAL DESCRIPTION & ZONING

LEGAL DESCRIPTION: SEE CIVIL PLAN

ASSESSOR'S PARCEL NO: 0132-204-04, 0132-182-08 & -09

SPECIFIC PLAN LEGEND: GATEWAY SPECIFIC PLAN

ZONING: F-C (FREEWAY COMMERCIAL)

SITE PLAN GENERAL NOTES

1. THE SITE PLAN SHALL MEET ALL ENGINEERING & NPDES REQUIREMENTS.
2. GENERAL CONTRACTOR TO REVIEW THE SOILS REPORT AND ALL AMMENDMENTS LISTED ON THE TITLE SHEET AND FOLLOW ALL RECOMMENDATIONS.
3. U.O.N., ALL DIMENSIONS TO CONCRETE WALLS AND CURBS ARE EITHER TO THE CENTER (SHOWN WITH A CENTERLINE) OR FACE OF THE WALL OR CURB. ALL DIMESIONS TO FRAMED WALLS ARE EITHER TO THE CENTER LINE OF THE WALL FRAMING (SHOWN WITH A CENTERLINE) OR THE FACE OF THE WALL FINISH.
4. REFER TO CIVIL AND MEP PLANS TO CONFIRM UTILITY INFORMATION SHOWN ON THE ARCHITECTS SITE PLAN AND FOR ADDITIONAL UTILITY INFORMATION. GENERAL CONTRACTOR TO COORDINATE ALL POINTS OF CONNECTION.
5. REFER TO CIVIL DRAWINGS FOR ALL FINISHED GRADES AND SLOPES. ALL FINISHED GRADES TO PROVIDE POSITIVE DRAINAGE AWAY FORM THE BUILDING. GENERAL CONTRACTOR TO FIELD VERIFY.
6. ALL ACCESSIBLE ROUTES INDENTIFIED ON THE SITE PLAN DRAWINGS SHALL CONFORM TO THE FOLLOWING:
   a) SLOPES IN THE DIRECTION OF TRAVEL DO NOT EXCEED 5%. CROSS SLOPES DO NOT EXCEED 2%.
   b) THE CLEAR WIDTH OF ALL WALKWAYS IS 4'-0" MIN.
   c) CHANGES IN LEVEL UP TO 1/2" COMPLY w/ 11A\D.2.1. CHANGES IN LEVEL GREATER THAN 1/2" IF THEY OCCUR ARE RAMPED. SEE PLANS
   d) THE VERTICAL CLEARANCE ALONG THE ACCESSIBLE ROUTE IS 80" MIN.
7. ALL PAVED AND LANDSCAPED AREAS TO BE BOUND BY A MIN. 6" HIGH, 6" WIDE CONCRETE CURB U.O.N.
8. A CONCRETE MOW STRIP EXTENDING 12" BEYOND EA END OF THE OPENING SHALL BE PROVIDED @ ALL EXTERIOR GLAZING WHERE THE SILL IS WITHIN 3' VERICAL OF THE FINISHED GRADE. SEE 2/AD1.1
10. PROVIDE PIPE BOLLARD PROTECTION POSTS AS REQUIRED BY UTILITY COMPANIES AND OR FIRE AUTHORITIES AT ALL EXTERIOR ELECTRICAL EQUIPMENT AND FIRE PREVENTION DEVICES. IF PIPE BOLLARD PROTECTION POST DETAILS ARE NOT PROVIDED BY UTILITY COMPANIES AND OR FIRE AUTHORITY SEE DETAIL 3/AD1.1
11. ALL EXPOSED BIORETENSION DEVICE COVERINGS SHALL BE PAINTED FORREST GREEN.
12. WHERE OCCURS, GENERAL CONTRACTOR TO PROVIDE FLUID APPLIED DAMP PROOFING AT ALL RETAINING AND PLANTER WALLS WHERE THE SIDE OF THE WALL OPPOSITE THE SOIL SIDE IS EXPOSED TO VIEW AND ALL EXTERIOR WALLS WHERE THE ADJACENT FLOOR SLAB IS BELOW GRADE. SEE 19/AD1.1

SHEET INDEX

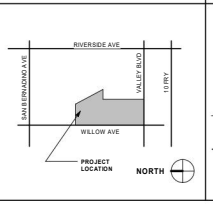
KEYNOTES

102 PROPOSED DRIVEWAY, PER JURISDICTIONAL STANDARDS.
105 CONCRETE PAVING.
109 (N) TRANSFORMER LOCATION.
111 TYP U.O.N., STANDARD PARKING STALL. 9'-0" WIDE x 20'-0" DEEP.
112 EV (ELECTRIC VEHICLE) CAPABLE PARKING STALL. PROVIDE FOR FUTURE EVSE (ELECTRIC VEHICLE SUPPLY EQUIPMENT). MATCH STANDARD STALL SIZE
113 EVCS (ELECTRIC VEHICLE CHARGING STATION). PROVIDE EVSE (ELECTRIC VEHICLE SUPPLY EQUIPMENT). MATCH STANDARD STALL SIZE
114 ACCESSIBLE SITE ENTRANCE SIGN.
115 STANDARD ACCESSIBLE PARKING STALL. 9'-0" WIDE x DEPTH OF STANDARD STALL.
116 VAN ACCESSIBLE PARKING STALL. 12'-0" WIDE x DEPTH OF STANDARD STALL.
117 STANDARD ACCESSIBLE EVCS (ELECTRICAL VEHICLE CHARGING STATION). 9'-0" WIDE x DEPTH OF STANDARD STALL. PROVIDE ELECTRIC VEHICLE SUPPLY EQUIPMENT.
118 VAN ACCESSIBLE EVCS (ELECTRICAL VEHICLE CHARGING STATION). 12'-0" WIDE x DEPTH OF STANDARD STALL. PROVIDE ELECTRIC VEHICLE SUPPLY EQUIPMENT.
124 EXERIOR CONCRETE LANDING.
139 RETAINING WALL.
140 TRASH ENCLOSURE w/ ROOF COVERING.
173 EXISTING SCREEN WALL TO REMAIN.
174 EXISTING CHAIN LINK FENCE TO REMAIN.
175 CONCRETE TILT-UP SCREEN WALL. MIN HEIGHT 5'-0" ABOVE HIGHEST ADJACENT FINISHED GRADE. PAINT BOTH SIDES AND TOP OF WALL. SEE PLANS FOR COLOR SCHEDULE.

PROJECT INFORMATION

PROJECT INFORMATION - SCH 13	11.26.2024		BUILDING 1		BUILDING 2	
NET SITE AREA	262,157 SF	6.02 AC	BUILDING AREA	73,210 SF	BUILDING AREA	46,758 SF
			FOOTPRINT	70,810 SF	FOOTPRINT	45,558 SF
NET FAR		45.8%	WAREHOUSE	66,810	WAREHOUSE	43,558
MAX FAR		N/A	OFFICE	4,000	OFFICE	2,000
			MEZZANINE	2,400 SF	MEZZANINE	1,200 SF
SPECIFIC PLAN		GATEWAY SPECIFIC PLAN	OFFICE	2,400	OFFICE	1,200
ZONE		F-C (FREEWAY COMMERCIAL)				
			PARKING REQUIRED	60	PARKING REQUIRED	38
STREET SETBACK		25' *	WAREHOUSE @ 1/1,000 <10K SF	10	WAREHOUSE @ 1/1,000 <10K SF	10
INT/REAR SETBACK		0'	WAREHOUSE @ 1/2,000 >10K SF	29	WAREHOUSE @ 1/2,000 >10K SF	17
		*SETBACK @ 1' PER 1' OF BUILDING HEIGHT	GROUND FLOOR OFFICE @ 1/250	16	GROUND FLOOR OFFICE @ 1/250	8
CONSTRUCTION TYPE		II-B	NON-GROUND FLOOR OFFICE @ 1/500	5	NON-GROUND FLOOR OFFICE @ 1/500	3
ALLOWED MAX HEIGHT		55'	PARKING PROVIDED	62	PARKING PROVIDED	49
			STANDARD	47	STANDARD	39
LANDSCAPE REQUIRED	10%	26,216 SF	VAN ADA	1	VAN ADA	1
LANDSCAPE PROVIDED	19.6%	51,477 SF	STND ADA	2	STND ADA	1
			VAN EVCS	1	VAN EVCS	1
			STND EVCS	1	STND EVCS	1
			EV CAPABLE	30	EVCS	6

VICINITY MAP



SITE LEGEND

- LANDSCAPE AREA
- CONCRETE PAVING. SEE CIVIL DRAWINGS FOR PAVING SECTIONS
- FIRE HYDRANT. PROVIDE PIPE BOLLARD PROTECTION POSTS AS REQUIRED. SEE 3/AD1.1
- STREET LIGHT
- INDICATES AN ACCESSIBLE ROUTE. MUST COMPLY w/ SITE PLAN GENERAL NOTE #6
- PROPERTY LINE
- DOCK HIGH DOOR
- DRIVE THRU. DOOR

A21-2181
06.14.2024

SITE PLAN

A1

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SOURCE: Herdman Architecture + Design 2021

FIGURE 2-6
Site Plan
IBG Willow and Valley Rialto Warehouses

DUDEK

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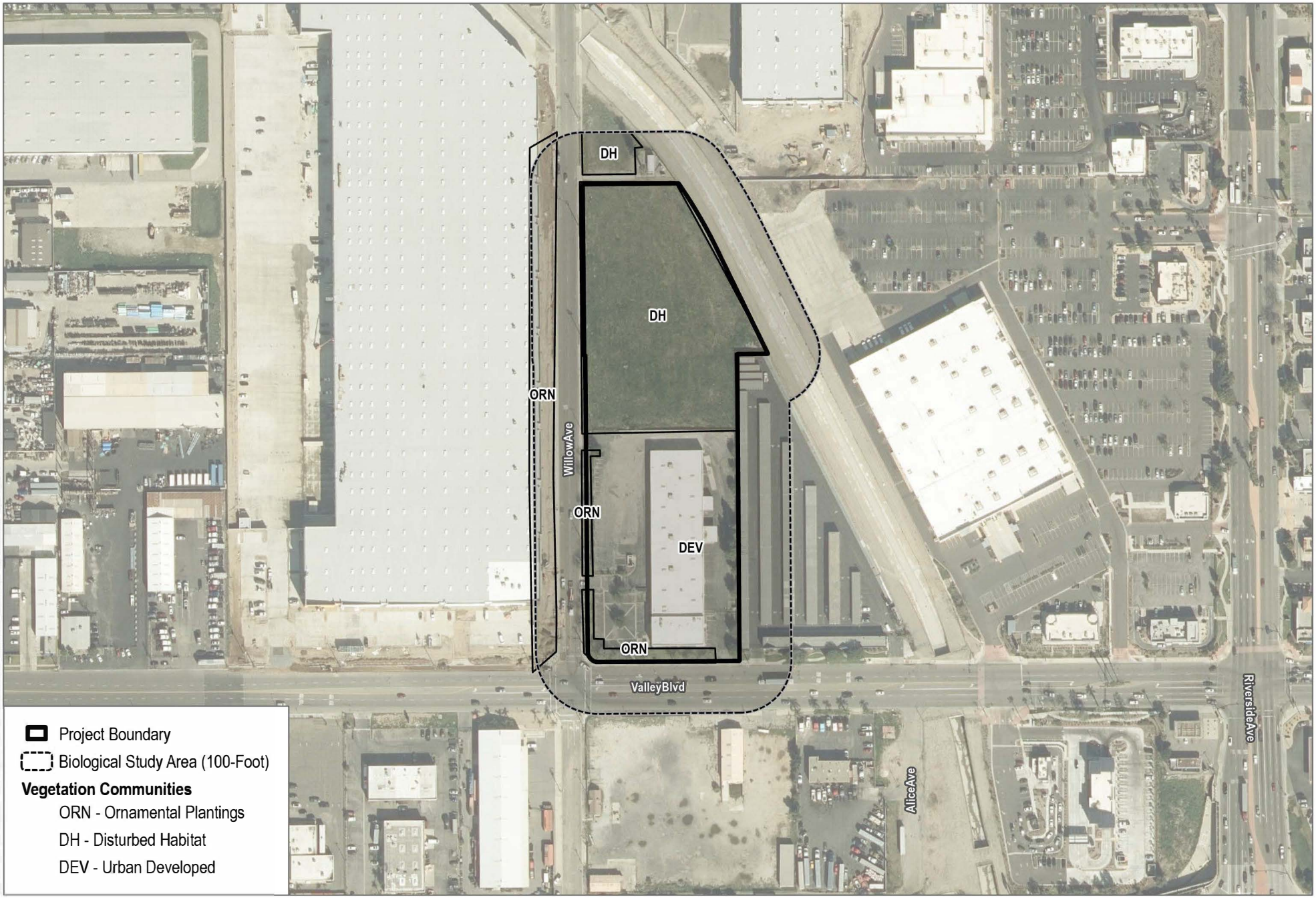

SOURCE: ESRI Aerial Imagery 2025, County of San Bernardino

DUDEK

0 120 240 Feet

FIGURE 3.4.1

Biological Resources

IBG Willow and Valley Rialto Warehouses

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