WEST COAST BOULEVARD AND LOCUST AVENUE WAREHOUSE PROJECT

ADDENDUM TO THE CITY OF RIALTO ENVIRONMENTAL IMPACT REPORT FOR THE RIALTO AIRPORT SPECIFIC PLAN

(SCH NO. 96071027)

Kimley »Horn

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Prepared for	City of Rialto
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June 2024

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1 INTRODUCTION

The project applicant is requesting the City of Rialto's consideration of the approval of the West Coast Boulevard and Locust Avenue Warehouse Project (proposed Project or Project), an approximately 225,173-square-foot (sf) warehouse and distribution development, including approximately 10,000 square feet of office, located southeast of the intersection of West Coast Boulevard and Locust Avenue.

1.1 Project Location

The project site is located in the northern area of the City of Rialto (City) in San Bernardino County (County), approximately 1.3 miles north of State Route (SR) 210. The site is at the southeast corner of the intersection of West Coast Boulevard and Locust Avenue. Existing vehicular access to the site is provided from one driveway on Locust Avenue. The site is bordered by West Coast Boulevard and residential land uses to the north, residential land uses to the east, industrial land uses to the south, and Locust Avenue and industrial uses to the west (see **Exhibit 1: Regional Vicinity Map** and **Exhibit 2: Site Vicinity Map**).

1.2 California Environmental Quality Act

This Addendum has been prepared in accordance with the provisions of the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] §§21000 et seq.); the State CEQA Guidelines (Title 14, California Code of Regulations [CCR] §§15000 et seq.); and the rules, regulations, and procedures for implementing CEQA as set forth by the City of Rialto. Pursuant to the provisions of CEQA and the State CEQA Guidelines, Rialto is the Lead Agency charged with the responsibility of deciding whether to approve the Project.

Section 15164(a) of the State CEQA Guidelines states that "the lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in PRC Section 21166 and Section 15162 calling for preparation of a subsequent EIR have occurred." Pursuant to Section 15162(a) of the State CEQA Guidelines, a subsequent Environmental Impact Report (EIR) or Negative Declaration is only required when:

- Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

- (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

As part of its decision-making process, the City is required to review and consider whether the Project would create new significant impacts or significant impacts that would be substantially more severe than those disclosed in the *Rialto Airport Specific Plan Program Environmental Impact Report* (Airport Specific Plan EIR). Additional CEQA review beyond this Addendum would be triggered if the proposed Project creates new significant impacts or impacts that are more severe than those disclosed in the Airport Specific Plan EIR such that major revisions to the Airport Specific Plan EIR would be required.

The following describes the requirements of an addendum, as defined by State CEQA Guidelines Section 15164:

- (a) The lead agency or responsible agency shall prepare an Addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- (b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.
- (c) An addendum need not be circulated for public review but can be included in or attached to the Final EIR or adopted negative declaration.
- (d) The decision making body shall consider the addendum with the final EIR prior to making a decision on the project.
- (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

1.3 Background

The Rialto Airport Specific Plan (referred herein as the Airport Specific Plan) was adopted and the Rialto Airport Specific Plan Program EIR (referred herein as the Airport Specific Plan EIR) was certified by the Rialto City Council in November 1997. At that time, the Airport Specific Plan area included approximately 3,131 acres in northwest Rialto. As described in the Airport Specific Plan, the boundaries of the area were generally Baseline Road to the south and the City's corporate limits to the west. Much of the northern boundary was along Casa Grande Drive, with a small portion of the area (east of Locust Avenue) extending north to Riverside Avenue. The eastern boundary was east of Locust Avenue (between Maple Avenue and Locust Avenues) in the northern portion of the Airport Specific Plan area, and along Cedar Avenue (south of Norwood Street) and Cactus Avenue (south of Route 30; now Interstate 210 [I-210]). The Airport Specific Plan was intended to provide a long-term strategy for the development of the airport and surrounding area.

On December 6, 2005, the Rialto City Council adopted resolutions declaring the intent to relocate the Rialto Airport operations to other nearby facilities. With the closure of the Rialto Airport, many of the assumptions for development in the Airport Specific Plan area were no longer applicable. On November 9, 2010, the Rialto City Council adopted the Renaissance Specific Plan and certified the Renaissance Specific Plan Program EIR. The approximately 1,439-acre Renaissance Specific Plan area is generally bordered by Casmalia Street to the north, Baseline Road to the south, Ayala Drive to the east, and Tamarind Avenue to the west. With the adoption of the Renaissance Specific Plan, the boundaries of the Airport Specific Plan area were modified to exclude the Renaissance Specific Plan area.

The remainder of the Airport Specific Plan continues to regulate the areas outside of the Renaissance Specific Plan area. The project site for the proposed Project is within the boundaries of the Airport Specific Plan area. The Airport Specific Plan EIR identified that the following topical areas would have a less than significant impact with the adoption of mitigation measures: Aesthetics, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use, Mineral Resources, Noise, Public Services, and Utilities. No significant impacts were identified for the topic of Recreation. With the implementation of mitigation measures, the Airport Specific Plan EIR found that the following topical areas would result in significant and unavoidable impacts: Air Quality and Transportation.

The land use designation for the project site in the Airport Specific Plan is Planned Industrial Development (I-PID). Warehouses are a permitted use in the I-PID and the Airport Specific Plan assumed a maximum FAR of 0.7:1 for Planned Industrial Development. The total area of the proposed project site is 488,624 sf, which at a 0.7:1 FAR would result in a maximum allowable building size of 342,037 sf. As further discussed in Section 2, *Project Description*, the proposed development would include one 225,173-sf warehouse and distribution facility, which is 116,864 sf less than what was assumed for the project site in the Airport Specific Plan EIR. Accordingly, the proposed Project would result in less intense development than what was previously analyzed for the project site in the Airport Specific Plan EIR.

1.4 Conclusion

The West Coast Boulevard and Locust Avenue Warehouse Project Addendum to the Airport Specific Plan Program EIR finds that potential impacts associated with this Project would be less than or the same as those described in the Airport Specific Plan EIR for buildout of the Specific Plan area. As discussed in this Addendum, these conclusions are supported by substantial evidence, including project-specific analyses of potential environmental impacts.

Consistent with State CEQA Guidelines Section 15162, based upon the analysis of potential environmental consequences anticipated to occur from implementation of the Project as provided in Section 3, *Evaluation of Environmental Impacts*, the Project would not result in any new or more severe impacts that were not disclosed, analyzed, and mitigated for in the Airport Specific Plan EIR. As demonstrated in this Addendum, the Project's potential impacts would either be the same or less than those anticipated for the future development on the project site as evaluated in the Airport Specific Plan EIR. In addition, there are no substantial changes to the circumstances under which the Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the Airport Specific Plan EIR, nor has any new information regarding the potential for new or more severe significant environmental impacts been identified. Consistent with CEQA Guidelines Section 15162(a)(3)(C), no new information of substantial importance shows that mitigation measures or alternatives that were

previously found not to be feasible or that are considerably different from those analyzed for the Airport Specific Plan EIR would substantially reduce one or more significant effects on the environment. Therefore, and as set forth below, none of the conditions described in CEQA Guidelines Section 15162 have occurred, thus an addendum is appropriate (CEQA Guidelines §15164(a)).

Therefore, in accordance with State CEQA Guidelines Section 15126 and Section 15164, this Addendum to the previously certified Airport Specific Plan EIR is the appropriate environmental documentation for the Project. In taking action on any of the approvals, the decision-making body must consider the whole of the data presented in the Airport Specific Plan EIR, as augmented by this Addendum. Therefore, preparation of a subsequent EIR is not required and the appropriate CEQA document for the Project is this Addendum to the Airport Specific Plan EIR. No additional environmental analysis or review is required for the Project. This document will be maintained in the administrative record files at the City of Rialto offices.

2 DESCRIPTION OF PROPOSED PROJECT

2.1 Project Setting and Location

The approximately 11.21-acre project site is comprised of Assessor Parcel Numbers [APNs] 0239-301-39, 0239-301-40, 0239-301-51, 0239-301-55, 0239-301-56, and 0239-301-64 and is located in the City of Rialto, San Bernardino County, California. The City is approximately 22 square miles in San Bernardino County. The site is in the northern area of the City, approximately 1.3 miles north of SR-210. Specifically, the project site is located at the southeast corner of the intersection of West Coast Boulevard and Locust Avenue within the Airport Specific Plan area. **Exhibit 1: Regional Vicinity Map** and **Exhibit 2: Site Vicinity Map** depict the project site in a regional and local context, respectively.

The northern portion of the project site is vacant and the southern portion of the site is partially paved and used for construction equipment storage. A sidewalk is located between the landscaped area and the edge of the curb on a portion of Locust Avenue. There is also ornamental landscaping on Locust Avenue along the improved part of the project site frontage. Both the sidewalk and landscaping terminate at the end of the improved project site frontage. The West Coast Boulevard frontage is unimproved. The project site is generally flat, and elevations range from approximately 1,660 to 1,643 feet above mean sea level (amsl), sloping from the northwest corner of the site to the southeast corner.

The site is bordered by West Coast Boulevard and single-family residences to the north; single-family residential uses to the east; industrial uses to the south; and Locust Avenue and industrial uses to the west. **Table 2-1: Existing Land Uses** summarizes the land uses on and near the project site.

Table 2-1: Existing Land Uses					
Direction	Land Uses				
Project site	Southern portion of site is paved and used for construction equipment storage. The northern portion of the site is not developed.				
North	West Coast Boulevard and single-family residences north of West Coast Boulevard				
South	Industrial uses				
East	Single-family residences				
West	Locust Avenue and industrial uses west of Locust Avenue				

2.2 Existing Land Use Designations

The City's General Plan Land Use Plan Map depicts the City's land use designations and indicates that the project site has a Light Industrial land use designation with a Specific Plan Overlay. The Light Industrial land use designation allows for a broad range of heavy industrial activities.

The City's Zoning Map identifies the project site as being located within and subject to the Airport Specific Plan. The Airport Specific Plan was adopted in 1997. The Rialto Municipal Airport ceased operations in 2014 and the former airport property and much of the properties adjacent to the Rialto Municipal Airport were removed from the Airport Specific Plan and incorporated into the Renaissance Specific Plan, which was adopted by the City in 2010. The Airport Specific Plan serves as zoning for the remaining properties within the Specific Plan area. The Airport Specific Plan identifies the project site as Planned Industrial Development (I-PID). Development standards for the Planned Industrial Development (I-PID) zone are identified in Chapters 5.5 and 6.25 of the Airport Specific Plan.



Source: ArcGIS

Exhibit 1: Regional Vicinity Map

West Coast Boulevard and Locust Avenue Warehouse Project Rialto, CA





Source: Google Earth Pro, 2023

Exhibit 2: Local Vicinity Map West Coast Boulevard and Locust Avenue Warehouse Project Rialto, CA



2.3 Project Objectives

The Airport Specific Plan identified goals for the implementation of the development within the Specific Plan area.

Goal 1: A balanced development which provides for a variety of uses, as appropriate.

Goal 2: The market potential for the Specific Plan area maximized.

Goal 3: Adjacent land uses that are compatible with one another.

Goal 4: A workable and implementable plan.

Goal 5: Aesthetically pleasing development to enhance property values.

Goal 6: A safe and efficient circulation system within, and through, the study area.

Goal 7: Provision of public services and utilities to Specific Plan area developments.

Project objectives are as follows:

- Objective 1: Create a new quality industrial facility, consistent with the intent of the Rialto Airport Specific Plan and Rialto Airport Specific Plan EIR.
- Objective 2: Improve the current aesthetics of the site with a contemporary facility with quality architecture and improved landscaped areas surrounding the facility.
- Objective 3: Incorporate green technologies and construction best management practices in the design and construction of the facility, to reduce the impact on the environment relative to those contemplated at the time of the Specific Plan.
- Objective 5: Bring additional economic benefit to the City of Rialto, by bringing substantial new investment to the City, increasing the property valuation and associated property tax rolls.

2.4 Project Characteristics

Site Development

The environmental analysis provided for this Addendum is based on the development of an approximately 225,173-sf warehouse and distribution facility on the 11.21-acre project site. The warehouse building would be oriented north-to-south and would include approximately 215,173 sf of warehouse space and approximately 10,000 sf of ancillary office space, the latter on two levels, with 31 dock doors and two drive thru doors on the west side of the building. The building would be rectangular with dimensions of approximately 420 feet wide (east-to-west) by 615 feet long (north-to-south); the building height would be approximately 36 feet 10 inches. Employee parking and landscaping would be provided along the eastern and southern property boundaries. Trucks would access the project site from two driveways located on Locust Avenue. Passenger vehicles would access the project site from the southern driveway on Locust Avenue. An additional driveway would be constructed at the northeast corner of the project site along West Coast Boulevard, which would provide site access to passenger vehicles only. **Exhibit 3: Conceptual Site Plan**, depicts the proposed development. **Table 2-2: Project Building Summary**, summarizes the Project's characteristics.



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Table 2-2: Project Building Summary								
	Office	Office	Warehouse	Total Building	Dock	Automobile Parking Stalls		
Site (sf)	Level 1 (sf)	Level 2 (sf)	(sf)	(sf)	Doors	Required	Provided	
488,146	5,000	5,000	215,173	225,173	31 doors	153	153	

The Project is currently planned as a "speculative project" meaning that the future tenants of the building are not currently known. Without knowing who the future tenants will be, an exact number of future employees or hours of operation cannot be determined. Accordingly, this Addendum and associated technical reports use approximate potential on-site employees, hours of operation, and vehicular traffic generation based on the Project's proposed square footage and use as a warehouse and distribution facility.

Architecture, Landscaping, and Lighting

As shown in **Exhibit 4: Conceptual Exterior Elevations**, the conceptual architectural design for the Project assumes concrete tilt-up panels with architectural treatments, such as panel reveals and articulation, to provide visual interest to the building facades. The exterior elevations would be white with shades of grey accents. The building would have additional architectural articulation through the use of windows with blue glazing and black anodized mullions, full building height accent tile (simulating wood), as well as metal canopies. Rooftop screening of mechanical equipment is assumed as a part of the warehouse building.

Exhibit 5: Conceptual Landscape Plan depicts the proposed landscaping plan for the project site. Of the 11.21-acre project site, approximately 79,355 sf (or approximately 16.26%) of the project site would be landscaped. The Airport Specific Plan identifies an average minimum width of landscaping from the property line for properties designated I-PID should be 20 feet from the property line; the proposed Project would include a minimum 25-foot landscape setback.

A 14-foot screen wall would be provided at the rear of the landscaping setback to allow landscaping to be viewed from the public right-of-way along West Coast Boulevard and Locust Avenue. Section 18.61.270 of the City's Municipal Code addresses landscaping and buffering for industrial land uses within the City, including the City's requirements for the efficient use of water in the landscape design plan.

Existing landscaping along Locust Avenue would be removed and replaced. Landscaping would be provided along the Locust Avenue and West Coast Boulevard street frontages, driveway entrances, property boundaries, as well as adjacent to the warehouse building and in the employee parking areas. The proposed landscaping would include a mix of ornamental trees and a mix of shrubs and groundcover plants. Additionally, the Project would include an outdoor employee break area in the southwestern portion of the project site.

Site lighting would be provided for circulation, safety, and security. The proposed Project would include outdoor security lighting on the building and in the parking area, which would be directed downward onto the project site and installed in accordance with applicable City ordinances, including the City of Rialto Municipal Code Section 18.61.140, which requires that lighting not exceed one footcandle at any nonresidential property line. The Project assumes that night lighting would be provided seven days per week.







Exhibit 4: Conceptual Exterior Elevations West Coast Boulevard and Locust Avenue Warehouse Project Rialto, CA

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PLANTING SCHEDULE

REE	BOTANICAL NAME	COMMON NAME	SIZE	<u>QTY</u>
	QUERCUS VIRGINIANA	SOUTHERN LIVE OAK	24" BOX	18
	PLATANUS RACEMOSA	CALIFORNIA SYCAMORE	24" BOX	22
	PARKINSONIA FLORIDA	PALO VERDE	24" BOX	25
	RHUS LANCEA	AFRICAN SUMAC	24" BOX	19
	PROSOPIS	MESQUITE	24" BOX	27
(\cdot)	CHILOPSIS LINEARIS	DESERT WILLOW	24" BOX	11
HRUBS				

SEE PLANTING PALETTE

1'=100' - 0" SCALE NORTH

100



OVERALL CONCEPTUAL LANDSCAPE PLAN | L1

200

Exhibit 5: Conceptual Landscaping Plan West Coast Boulevard and Locust Avenue Warehouse Pro

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West Coast Boulevard and Locust Avenue Warehouse Project Rialto, CA

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Site Access and Parking

The Project would have three points of access: two driveways on Locust Avenue and one driveway on West Coast Boulevard. The two driveways on Locust Avenue would be unsignalized and would provide site access for truck and passenger vehicles. The northernmost driveway on Locust Avenue would be 45 feet wide while the southernmost driveway would be 46.8 feet wide. Access to the truck court and loading dock area would be gated would have Knox-pad locks. The gates would be located near the bottom of the northern driveway and at the entrance to the truck court from the southern driveway. The driveway on West Coast Boulevard would be 26 feet wide, unsignalized, and would provide site access for passenger vehicles. A minimum 26-foot-wide fire lane would extend through the truck court and along the parking aisles on the southern and eastern perimeter of the project site.

The warehouse and distribution development would provide 153 parking stalls including 111 standard passenger vehicle parking stalls, 4 standard accessible passenger vehicle parking stalls, 2 accessible van parking stalls, 26 standard electric vehicle (EV) stalls, 2 standard accessible EV charging parking stalls, 1 accessible van EV charging parking stall, and 7 electric vehicle charging station parking stalls. The Project also includes 56 truck trailer parking stalls. The Project would provide 31 dock doors, more than the minimum three loading spaces required per Section 18.58.030 of the City's Municipal Code.

Non-Vehicular Transportation

Five-foot-wide meandering sidewalks would be provided along Locust Avenue and West Coast Boulevard.

On-site bike racks would be located near the entrances to the office areas of the warehouse, which are proposed near the northeast and southwest corners of the building. The Rialto General Plan (Exhibit 4.4, Bicycle Routes) identifies proposed Class II bicycle lanes along Casa Grande Drive, which is approximately 190 feet north of the project site, and along Riverside Avenue, which is approximately 0.4 mile north of the project site.

Omnitrans provides public transportation throughout San Bernardino County, including the City of Rialto. There are several transit stops near the project site on Casa Grande Drive and on Locust Avenue. The nearest transit stops are approximately 430 feet north of the project site on Casa Grande Drive and approximately 840 feet south of the project site on Locust Avenue on the Route 22 line.

Off-Site Improvements

Off-site improvements include street and sidewalk improvements to Locust Avenue along the project site frontage and sidewalk and street improvements (curb and gutter improvements) to West Coast Boulevard. Improvements to West Coast Boulevard would occur on both the north and south sides of the road.

Along the improved part of Locust Avenue adjacent to the project site, the ultimate right-of-way is 88 feet (44 feet half width). Improvements to Locust Avenue along the project site frontage include 14 feet of right-of-way dedication to allow for a 5-foot-wide meandering sidewalk and roadway improvements/ widening to West Coast Boulevard. On Locust Avenue, the sidewalk would be constructed from its existing northerly terminus to West Coast Boulevard. On Locust Avenue north of West Coast Boulevard, improvements would consist of tapering the roadway width to match the existing width of Locust Avenue north of West Coast Boulevard.

West Coast Boulevard is an existing unimproved roadway between Locust Avenue and the existing singlefamily residences east of the project site boundary. West Coast Boulevard has an ultimate right-of-way of 64 feet. As a part of the Project, the following improvements would be made to West Coast Boulevard. From the project site property line and within the 64-foot-wide ultimate right-of-way, West Coast Boulevard would be constructed to provide 52 feet of roadway with curb and gutter and one travel lane in each direction. As previously addressed, sidewalks would be constructed on both the north and south sides of West Coast Boulevard along the project site frontage from the existing terminus of the sidewalk to the east to Locust Avenue. On West Coast Boulevard, the sidewalk improvements would be constructed within the 25-foot-wide landscape setback area. The Project would include non irrigated landscaping and fencing on the north side of West Coast Boulevard.

The Project proposes, in coordination with Southern California Edison (SCE), to relocate the existing overhead utilities located along the project site frontage on the south side of West Coast Boulevard to the north side of West Coast Boulevard. Overhead utilities located along the project site frontage on Locust Avenue are proposed to be undergrounded.

With off-site improvements, the total disturbance area evaluated in this Addendum is approximately 12.01 acres.

Utility Infrastructure

Project implementation would require construction of new utility infrastructure. The Project would connect to existing utility infrastructure with the final sizing and design of on-site facilities occurring during final building design and plan check.

Water and Sewer. The project site is within the service area of West Valley Water District for the provision of water; sewer treatment is provided by the City of Rialto. The Project would connect to the existing municipal water system and the existing sewer infrastructure in Locust Avenue and West Coast Boulevard. Within Locust Avenue, there are existing 25-inch and 12-inch water pipelines and an existing 12-inch sewer pipeline. Additionally, there are existing 12-inch and 6-inch water pipelines located within West Coast Boulevard.

Drainage and Water Quality. Proposed drainage improvements would include two catch basins located within the southeastern portion of the project site and one underground chamber facility. Runoff from the project site would be conveyed via a 24-inch polyvinyl chloride (PVC) storm drain to the existing 102-inch reinforced concrete pipe (RCP) in Locust Avenue. The proposed catch basins would treat and detain storm water to minimize peak flow rates. The Project's 100-year overflows would be discharged into the existing 102-inch RCP storm drain located within Locust Avenue.

Dry Utilities. SCE provides electrical power to the area, inclusive of the project site and the Southern California Gas Company (SoCalGas) provides natural gas to the area. The Project would connect to existing utility lines located along the project site frontage along West Coast Boulevard, which are proposed to be relocated to the north side of West Coast Boulevard. Additionally, the Project, in coordination with SCE, proposes to underground existing overhead utilities located along the project site boundary on the east side of Locust Avenue. No natural gas service would be provided.

Solid Waste Management. The City of Rialto's Waste Management Office provides environmental services to City residents and businesses. The Waste Management Office oversees the City's refuse and recycling service contract provided by Burrtec Disposal.

2.5 Construction Activities

Project construction is anticipated to begin in 2024 with a construction duration of approximately nine months. Construction would occur in a single phase.

Although the project site is generally flat with a slight slope towards the southeast corner, due to the nature of the on-site soils, the Project would require over-excavation, relocation of on-site soils, and the removal of cobbles, cobble fragments, boulders, and boulder fragments. Based on information provided by the Applicant, total excavation and fill of soils for the proposed Project is anticipated to require 32,893 cubic yards (cy) of cut and 26,270 cy of fill, with approximately 6,623 cy of imported soil.

2.6 Intended Uses of the Addendum

City of Rialto

The City of Rialto is the Lead Agency as set forth in CEQA Section 21067 and is responsible for reviewing and approving the West Coast Boulevard and Locust Avenue Warehouse Project. The City of Rialto Planning Commission will consider the following discretionary approvals for the Project:

- **Conditional Development Permit No. 2023-0011** to allow the development of a warehouse and distribution facility, which is a conditionally permitted use in industrial zones within the City.
- Precise Plan of Design No. 2023-0018 for the development and operation of a 225,173-sf warehouse and distribution building and associated loading area, paving, screening, landscaping, lighting, storm water retention, etc. on 11.21 acres (APN 0239-301-39; 0239-301-40; 0239-301-51; 0239-301-55; 0239-301-56; and 0239-301-64) located at the southeast corner of West Coast Boulevard and Locust Avenue within the Planned Industrial Development (I-PID) zone of the Rialto Airport Specific Plan.
- Tentative Parcel Map No. 20853 to consolidate the existing parcels into one parcel and show the required City right-of-way dedication for West Coast Boulevard, vacations and easements (see Exhibit 6: Tentative Parcel Map).

Responsible Agencies

Santa Ana Regional Water Quality Control Board (RWQCB): Issuance of a National Pollution Discharge Elimination System (NPDES) Permit and Construction General Permit.



Exhibit 6: Tentative Parcel Map

West Coast Boulevard and Locust Avenue Warehouse Project Rialto, CA

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3 EVALUATION OF ENVIRONMENTAL IMPACTS

The scope of the City's review of the proposed West Coast Boulevard and Locust Avenue Warehouse Project is governed by provisions set forth in CEQA and the State CEQA Guidelines (Title 14, CCR §§15000 et seq.). This review is limited to evaluating the environmental effects associated with the proposed Project to the environmental effects of the Airport Specific Plan as set forth in the Airport Specific Plan EIR. This Addendum also reviews new information, if any, of substantial importance that was not known and could not have been known with the exercise of reasonable due diligence at the time the Airport Specific Plan EIR was certified. This evaluation includes a determination as to whether the changes proposed for the Project would result in any new significant impacts or a substantial increase in a previously identified significant impact.

Although State CEQA Guidelines Section 15164 does not stipulate the format or content of an Addendum, the topical areas in the CEQA Guidelines environmental checklist were used as guidance for this Addendum. This comparative analysis provides the City with the factual basis for determining whether any changes in the Project, any changes in circumstances, or any new information since the Airport Specific Plan EIR was certified would require additional environmental review or preparation of a Subsequent EIR or Supplemental EIR.

As previously discussed, pursuant to PRC Section 21166 and State CEQA Guidelines Section 15162, when an EIR has been previously certified for a project, no subsequent or supplemental EIR shall be prepared for that project unless the lead agency determines that one or more of the following three conditions are met: changes in the proposed project result in new or substantially more severe impacts than were disclosed in the previous EIR; changes in the circumstances surrounding the project result in new or substantially more severe impacts than were disclosed in the previous EIR; or new information has come to light showing that new or substantially more severe impacts than were disclosed in the previous EIR.

3.1 Aesthetics

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

- Threshold (b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?
- Threshold (c) Would the project conflict with applicable zoning and other regulations governing scenic quality?
- Threshold (d) Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Summary of Impacts Identified in the Airport Specific Plan EIR

The Initial Study for the Airport Specific Plan EIR noted that there were no scenic vistas or scenic highways within the Airport Specific Plan area. The Airport Specific Plan EIR characterized the Airport Specific Plan area as vacant property often littered with debris and not maintained resulting in visual blight. The area lacks continuity in signage, streetscape treatments, pedestrian environment, and a sense of place. The Airport Specific Plan EIR determined that the conversion of open space to urban uses would alter views in the area; however, implementation of the Design Guidelines and Development Standards in the Airport Specific Plan would ensure aesthetic quality of development. The Airport Specific Plan EIR includes Mitigation Measure 5.14-1 that requires the review of projects for conformance with the City's policies and guidelines to reduce potential impacts to a less than significant level. The Airport Specific Plan also found that implementation of the Airport Specific Plan would introduce new sources of light and glare. The Airport Specific Plan EIR Mitigation Measure 5.14-2 requiring a lighting plan would ensure that lighting is shielded to protect adjacent residential uses in the evening hours. The Airport Specific Plan EIR notes that ensuring that new projects conform with City regulations, policies and guidelines and the Development Regulations and Design Guidelines in the Airport Specific Plan that address visual quality and scenic resources would reduce potential aesthetic impacts to a less than significant level and create beneficial impacts.

Project-Specific Analysis and Significance Determination: No new impacts; no substantial change from previous analysis.

The Project would allow for an industrial warehouse and distribution development. The project site is located in a predominately industrial area of the City but there are also single-family residences adjacent to the site. The land uses bordering the project site consist of West Coast Boulevard and single-family residences to the north; single-family residences to the east; industrial uses to the south; and Locust Avenue and industrial uses west of Locust Avenue.

With respect to scenic vistas, the General Plan encourages the protection of scenic resources and views of the San Gabriel and San Bernardino Mountains, and the La Loma Hills, Jurupa Hills, Box Spring Mountains, Moreno Valley, and Riverside by limiting building heights¹. The Initial Study for the Airport Specific Plan EIR noted that there were no scenic vistas or scenic highways within Airport Specific Plan area.

¹ City of Rialto. (2010). *Rialto General Plan.* https://www.yourrialto.com/DocumentCenter/View/1494/2010-General-Plan. Accessed March 2023.

As noted in the Airport Specific Plan EIR, there are no State scenic highways adjacent to or proximate to the project site² nor is it visible from any officially designated or eligible scenic highway. Additionally, there are no rock outcroppings, historic buildings, or any other scenic resources on the project site.

With respect to zoning and other regulations governing scenic quality, the Airport Specific Plan identifies the project site as Planned Industrial Development (I-PID). Development standards for the Planned Industrial Development zone are identified in Chapters 5.5, Non-Residential, and 6.2.5, Industrial (I-AR, I-PID and I-GM) of the Airport Specific Plan. Title 18 of the Municipal Code functions as the City's Zoning Ordinance, which identifies the permitted land uses on all parcels in the City through assigned land use designations and associated land use regulations and development standards. The purpose of Title 18 is also to promote the consistent aesthetic character of the City and balance that character with continued development. Title 18 also contains provisions to manage light and glare levels in the City.

The maximum building height of the Project would be 36 feet 10 inches. This height is below the 75-foot maximum height allowed by the Airport Specific Plan (as amended by Ordinance No. 1604, which was approved and adopted by the City Council on July 26, 2018). The amendment changed the maximum building height in the I-AR and I-PID zones from 35 feet to 75 feet. As described in Section 2.5 of Ordinance No. 1604, the modification of the height limit would respect the environmental and aesthetic assets of the community by allowing for conformance with height standards in the General Plan and the Renaissance Specific Plan, which already permit 75-foot height limits for industrial buildings.

A 14-foot wall, setback approximately 25 feet, and ornamental trees would screen the truck yard from views along West Coast Boulevard. The warehouse and distribution building would be setback approximately 44 feet. Additionally, along Locust Avenue, the building would have a setback minimum of 25 feet, and a 14-foot wall and ornamental trees to screen the truck yard from views along Locust Avenue. The employee parking on the eastern building frontage would be setback approximately 15 feet and 9 inches, and the warehouse and distribution building would be setback approximately 106 feet and 9 inches from the eastern property boundary. The north elevation, along West Coast Boulevard and the east elevation along Locust Avenue would both be set below the existing grade, minimizing impacts of views from the existing residences north of the project site and from Locust Avenue and minimizing the variance between the proposed building elevation and the height of the one-story and residences to the north and the one-story residence and two-story residences adjacent to and east of the project site.

The existing residences north of the project site, across West Coast Boulevard, are one-story single-family homes. The proposed warehouse and distribution building would be constructed from an elevation below the existing grade, which is below the elevation of the residences north of West Coast Boulevard. Therefore, although the building would be a maximum of approximately 36 feet 10 inches, due to the change in grade and the 44-foot setback from West Coast Boulevard, the height of the building would be minimized as viewed from the residences north of West Coast Boulevard.

The existing residences east of the project site consist largely of two-story single-family homes. The proposed warehouse and distribution building would be constructed at approximately the same ground elevation as the existing ground surface, which is similar, or higher than the ground elevation of the existing residences east of the project site. Although the building would be a maximum of approximately

² California Department of Transportation. (2023). California State Scenic Highway System Map. https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed March 2023.

36 feet 10 inches, due to the building setback of more than 106 feet from the eastern property boundary, the height of the building would be minimized as viewed from the residences east of the project site.

Views of scenic resources and views from the project site are already partially obscured by intervening development including structures, landscaping, and overhead utility lines. Implementation of the Project would partially obscure long distant views of the San Gabriel Mountains and foothills to the north and northwest of the project site. However, due to existing and planned development in the area, implementation of the proposed Project consistent with the Airport Specific Plan would not substantially impact scenic vistas. The change is not considered a significant impact that would substantially affect the aesthetic nature of the project site, area, or the views from the project site. While the proposed Project would change the visual character of the site and alter views from some surrounding areas, these changes would not be considered to have a significant impact on a scenic vista.

The Project would change the site appearance from a vacant lot and a storage yard used for construction equipment to one with an industrial and distribution warehouse development. The aesthetic appearance of the site would be consistent with the intent of the Airport Specific Plan, specifically Section 5.5.2, Development Standards, which outlines the development standards for I-PID zoned areas. Compliance with the design guidelines would create a uniform and consistent theme within the overall plan area. Therefore, although the visual characteristics of the site would change, the Project would be consistent with the intent of the Airport Specific Plan and with adopted development regulations. The Airport Specific Plan EIR identified that development within the Airport Specific Plan area would be a beneficial aesthetic impact. Compliance and/or exceedance of the applicable development standards would ensure that the Project would not substantially impact the visual quality of the project site or its surroundings. Implementation of the proposed Project would be considered a beneficial aesthetic impact.

With respect to light and glare, the Project would introduce additional sources of lighting to illuminate the outside of the warehouse and distribution building, building entrance areas, signage, and the parking areas. Project lighting would be consistent with existing sources of nighttime lighting in the area associated with the existing industrial uses bordering and near the project site, as well as street lighting along Locust Avenue and West Coast Boulevard. Project lighting would be designed in accordance with the City's Zoning Code and would comply with all applicable development standards in Airport Specific Plan Section 6.2.5, Industrial (I-AR, I-PID, and I-GM). New sources of lighting would be oriented to avoid impacts on surrounding properties. For instance, freestanding light standards would not exceed 25 feet in height with no light spillage beyond property lines. General Plan Policy 2-14.3 requires the use of building materials that do not produce glare, such as polished metals or reflective windows. The Project would comply with General Plan Policy 2-14.3 as well as the development lighting guidelines identified in Section 6.2 of the Airport Specific Plan Design Guidelines, and therefore would preclude significant impacts from the project site related to light and glare. Incorporation of these design features would ensure that the introduction of the new sources of light associated with the Project would be less than significant.

Accordingly, no new impacts relative to adverse effects related to scenic vistas, scenic highways, regulations governing scenic quality, or light and glare that would substantially increase the severity of a previously identified impact evaluated in the Airport Specific Plan EIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the Airport Specific Plan EIR would impact the prior finding of less than significant with the incorporation of mitigation.

Cumulative Impacts

As identified in the Airport Specific Plan EIR, implementation of the Airport Specific Plan was considered a beneficial impact to the visual quality of the area. Lighting impacts would be mitigated to a less than significant level by existing City regulations. As discussed above, the Project would not cause a new significant adverse aesthetic impact to occur. Therefore, the Project would not cause a new cumulative impact to occur. Implementation of the Project would not alter the conclusions of the Airport Specific Plan EIR analysis and would not result in a new or substantially more severe Project-specific or cumulative aesthetic impact than those already analyzed.

Mitigation Program

Mitigation Measures 5.14-1 and 5.14-2 from the Airport Specific Plan EIR are applicable to the proposed Project.

- **MM 5.14-1** As part of the Precise Plan of Design review process for new projects, the City shall evaluate projects for conformance with the policies, guidelines, and regulations contained in the Specific Plan, as well as the Open Space/Conservation Element.
- **MM 5.14.-2** A lighting plan shall be required as part of the Precise Plan of Design review process. The lighting plan shall be reviewed to ensure that lighting is shielded to protect adjacent residential uses during the evening hours.

Conclusion

Based on the comparative analysis set forth in this Addendum, no new impacts relative to adverse aesthetic impacts or a substantial increase in the severity of a previously identified impact evaluated in the Airport Specific Plan EIR would occur. With regard to PRC Section 21166 and State CEQA Guidelines Section 15162(a), the Project would not result in any new impacts or increase the severity of the previously identified impacts with respect to aesthetics. There are no substantial changes to the circumstances under which the Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the Airport Specific Plan EIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the Airport Specific Plan EIR was certified is available that would impact the prior finding of less than significant with mitigation. Therefore, preparation of a subsequent environmental analysis is not warranted.

3.2 Agricultural and Forestry Resources

- Threshold (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?
- Threshold (b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?
- Threshold (c) 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?
- Threshold (d) Would the project result in the loss of forest land or conversion of forest land to nonforest use?
- Threshold (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?

Summary of Impacts Identified in the Airport Specific Plan EIR

At the time that the Airport Specific Plan EIR was prepared, the CEQA Appendix G checklist did not evaluate the loss or conversion of forest land or conversion of farmland to non-agricultural use. However, no agricultural lands or forest land were present in the Airport Specific Plan area. The Initial Study for the Airport Specific Plan EIR stated that there were no agricultural resources in the Airport Specific Plan area nor were there any agricultural operations currently in existence in the area. No significant impacts were identified and mitigation was not required.

Project-Specific Analysis and Significance Determination: No impact; no substantial change from previous analysis.

There are no agricultural resources in the Airport Specific Plan area or proximate to the project site. No Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance is mapped in the vicinity of the project site; the project site is designated as Urban and Built-Up Land³. Further, the project site is not the subject of a Williamson Act Contract.

The project site does not include forestry resources, including timberlands. No impacts related to the loss of farmland would occur. The Airport Specific Plan EIR did not propose agricultural or forestry land uses on the project site⁴. Accordingly, no new impact relative to agricultural or forestry resources or a substantial increase in the severity of a previously identified significant impact evaluated in the Airport Specific Plan EIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the Airport Specific Plan EIR was certified is available that would impact the prior finding of no significant impact.

Cumulative Impacts

Because the project site does not contain agricultural or forestry resources nor does it have a land use designation that would allow for these uses, the Project would not cumulatively contribute to any impact to agriculture or forestry resources. Therefore, the proposed Project would not cause a new cumulative

³ California Department of Conservation. (2023a) California Important Farmland Finder. https://maps.conservation.ca.gov/dlrp/ciff/. Accessed March 2023.

⁴ City of Rialto. (1997). *Rialto Airport Specific Plan Program Environmental Impact Report*.

impact to occur. Implementation of the Project would not alter the conclusions of the Airport Specific Plan EIR analysis and would not result in a new or substantially more severe project-specific or cumulative impact than those already analyzed.

Mitigation Program

No mitigation measures are required.

Conclusion

Based on the comparative analysis set forth in this Addendum, no new impacts relative to agricultural or forestry resources would occur. With regard to PRC Section 21166 and State CEQA Guidelines Section 15162(a), the Project would not result in any new impacts with respect to agricultural and forestry resources. There are no substantial changes to the circumstances under which the Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the Airport Specific Plan EIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the Airport Specific Plan EIR was certified is available that would impact the prior finding of no impact. Therefore, preparation of a subsequent environmental analysis is not warranted.

3.3 Air Quality

- Threshold (a) Would the project conflict with or obstruct implementation of the applicable air quality plan?
- Threshold (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?
- Threshold (c) Would the project expose sensitive receptors to substantial pollutant concentrations?
- Threshold (d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Regional Plan Consistency. The Airport Specific Plan EIR concluded that Airport Specific Plan implementation would result in a significant unavoidable impact with respect to consistency with the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP) and the Southern California Association of Governments' (SCAG) 1995 Regional Comprehensive Plan and Guide (RCPG). The Airport Specific Plan would substantially exceed the amount of traffic assumed in the City's General Plan for the Airport Specific Plan area. Since traffic and growth projections from the General Plan were used in AQMP and RCPG projections, buildout of the Airport Specific Plan would exceed growth/traffic projections anticipated in regional growth management plans and would not be consistent with local or regional growth documents. Therefore, the Airport Specific Plan EIR concluded that a significant unavoidable impact would occur.

Construction. The Airport Specific Plan EIR determined that air quality short-term impacts would occur from construction activities, including exhaust emissions from construction equipment and trucks hauling materials to and from sites. Specifically, the Airport Specific Plan EIR identified the total estimated pollutant emissions generated during construction assuming a 19-year buildout period. The Airport Specific Plan EIR noted that Airport Specific Plan construction activities would generate 448 pounds per day of reactive organic gases (ROG), 6,581 pounds per day of nitrogen oxides (NOx), 1,431 pounds per day of carbon monoxide (CO) and 467 pounds per day of particulate matter with a diameter of 10 microns or less (PM₁₀). Construction emissions were determined to exceed SCAQMD thresholds for all four pollutants (ROG, NOx, CO, and PM₁₀), with mitigation. Mitigation Measures 5.9-1A through 5.9-1H were identified in the Airport Specific Plan EIR to reduce short-term air emissions from implementation of the Airport Specific Plan. Airport Specific Plan implementation would result in significant unavoidable short-term air quality impacts.

Operations. The Airport Specific Plan EIR noted that the Airport Specific Plan would substantially exceed SCAQMD operational emission thresholds, except for PM_{10} . Specifically, total mobile (vehicular) source and stationary source (natural gas and power plant) emissions would result in the following estimated net daily pollutant generation at Specific Plan buildout: 26,237 pounds of CO, 5.323 pounds of NOx, 1,075 pounds of ROG, and 114 pounds of PM_{10} . The mixed-use nature of the Specific Plan and the implementation of quantifiable mitigation measures (Mitigation Measures 5.9-2A and 5.9-2B) would reduce long-term air quality impacts but they would remain significant and unavoidable.

Project-Specific Analysis and Significance Determination: No new impacts/reduced impacts; change from previous analysis.

The land use designation for the project site in the Airport Specific Plan is Planned Industrial Development (I-PID). Warehouses are a permitted use in the I-PID. The Airport Specific Plan assumed a maximum floor area ratio (FAR) of 0.7:1 for Planned Industrial Development. The total area of the project site is 488,624 sf, resulting in a maximum allowable building size of 342,037 sf. The Project proposes an approximately 225,173-sf warehouse and distribution facility, including an approximately 10,000 sf office component. As such, the proposed development would generate fewer vehicular trips and generate less emissions than assumed for the project site in the Airport Specific Plan EIR. Accordingly, air quality impacts associated with the proposed Project would be less than those assumed for the project site in the Airport Specific Plan EIR.

Regional Plan Consistency. With respect to whether the proposed Project would be consistent with the SCAQMD AQMP, AQMPs use regional growth projections that are based on the land use designations in the local general plans. Therefore, the land uses assumed, and the growth anticipated in the Airport Specific Plan EIR would be incorporated into the current 2022 AQMP, which supersedes the prior AQMP.

Criteria for determining consistency with the AQMP are defined by the following indicators:

- Consistency Criterion No. 1: Whether a project will result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.
- **Consistency Criterion No. 2**: Whether a project will exceed the assumptions in the AQMP or increments based on the year of project buildout phase.

With respect to the first criterion, based on the air quality modeling analysis conducted for the proposed Project and summarized later in this Addendum section, the Project would not exceed any SCAQMD thresholds for construction or operations. Therefore, the Project would not increase the frequency or severity of existing air quality violations. The proposed Project would be consistent with the first criterion and would not result in an increase in the frequency or severity of existing air quality violations or delay timely attainment of air quality standards (see Table 3.3-1 and Table 3.3-2).

Concerning Consistency Criterion No. 2, the 2022 AQMP contains air pollutant reduction strategies based on SCAG's latest growth forecasts, and SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans. Projections for achieving air quality goals are based on assumptions regarding population, housing, and growth trends. Therefore, the SCAQMD's second criterion for determining project consistency focuses on whether the proposed Project exceeds the assumptions used in preparing the forecasts presented in the 2022 AQMP.

The Project's proposed industrial warehouse and distribution use is an allowable use identified in the Airport Specific Plan and assumes less square footage than is permitted and previously analyzed under the Specific Plan for the project site. The Project is consistent with the City's land use designations and no change would be required. Therefore, the Project would not exceed the population or job growth projections used by the SCAQMD to develop the AQMP. The Project is also consistent with the second criterion. On a project-specific basis, the proposed Project would be consistent with the AQMP. Project implementation would not result in new or increase the severity of impacts as it pertains to consistency

with the AQMP and the City's General Plan. Therefore, there are no changes or new significant information that would require preparation of subsequent CEQA documentation.

Construction Emissions. Construction associated with the Project would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern are ozone (O_3) -precursor pollutants (i.e., ROG and NO_X) and PM₁₀ and PM_{2.5}. Construction-generated emissions are short term and of temporary duration, lasting only as long as construction activities occur but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD's thresholds of significance.

Construction results in the temporary generation of emissions resulting from site grading, road paving, motor vehicle exhaust associated with construction equipment and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities as well as weather conditions and the appropriate application of water.

Project construction is estimated to last approximately nine months. Construction-generated emissions associated with the Project were calculated using the California Air Resources Board (CARB)-approved CalEEMod computer program, which is designed to model emissions for land use development projects, based on typical construction requirements. With regard to fugitive dust, the Project would be required to implement SCAQMD Rules 402 and 403 (prohibition of nuisances, watering of inactive and perimeter areas, track out requirements, etc.). Therefore, fugitive dust suppression has been accounted for in CalEEMod. The table shows that all criteria pollutant emissions would remain below their respective thresholds and impacts would be less than significant. See **Appendix A** for more information regarding the construction assumptions used in this analysis. Predicted maximum daily construction-generated emissions for the Project are summarized in **Table 3.3-1: Construction-Related Emissions**.

Table 3.3-1: Construction-Related Emissions							
	Maximum Pounds Per Day						
Construction Year	ROG	NOx	со	SO2	PM 10	PM _{2.5}	
2024	55.87	36.90	34.04	0.09	10.22	4.15	
SCAQMD Threshold	75	100	550	150	150	55	
Exceed SCAQMD Threshold?	No	No	No	No	No	No	
ROG = Reactive Organic Gases; NO _x = Nitrogen Oxides; CO = Carbon Monoxide; SO ₂ = Sulfur Dioxide; PM ₁₀ = Particulate Matter 10 microns in							

diameter or less; PM_{2.5} = Particulate Matter 2.5 microns in diameter or less Notes: SCAQMD Rule 403 Fugitive Dust applied. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stockpiles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA

Handbook (Tables XI-A through XI-E) were applied. Refer to Appendix A for Model Data Outputs.

Source: CalEEMod version 2022.1.

Operational Emissions. The Project's operational emissions would be associated with area sources (e.g., landscape maintenance equipment, architectural coatings, off-road equipment, etc.), energy sources, mobile sources (i.e., motor vehicle use), and off-road equipment. Primary sources of operational criteria pollutants are from motor vehicle use and area sources. The operational emissions sources are described below.

- Area Source Emissions. Area source emissions would be generated due to on-site equipment, architectural coating, and landscaping that were previously not present on the site.
- Energy Source Emissions. Energy source emissions would be generated due to electricity and natural gas usage associated with the Project. Primary uses of electricity and natural gas by the Project would be for miscellaneous warehouse equipment, space heating and cooling, water heating, ventilation, lighting, appliances, and electronics.
- Mobile Source. Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO_X, PM₁₀, and PM_{2.5} are all pollutants of regional concern. NO_X and ROG react with sunlight to form O₃, known as photochemical smog. Additionally, wind currents readily transport PM₁₀ and PM_{2.5}. However, CO tends to be a localized pollutant, dispersing rapidly at the source.

Project-generated vehicle emissions are based on the trip generation within the Project's Traffic Impact Analysis and incorporated into CalEEMod as recommended by the SCAQMD. Per the Project Trip Generation and VMT Screening Memorandum, the Project would generate 391 daily trips (235 passenger vehicle trips and 156 truck trips).

Table 3.3-2: Operational Emissions								
	Maximum Pounds Per Day							
Source	ROG	NOx	СО	SO ₂	PM ₁₀	PM _{2.5}		
Airport Specific Plan Allowed	Airport Specific Plan Allowed Development							
Area Source Emissions	14.55	0.18	21.22	0.00	0.04	0.03		
Energy Emissions	0.14	2.52	2.11	0.02	0.19	0.19		
Mobile Emissions	2.48	40.54	48.52	0.38	17.10	4.85		
Off-Road Emissions	0.00	0.00	0.00	0.00	0.00	0.00		
Total Emissions	17.17	43.24	71.85	0.4	17.33	5.07		
Proposed Project								
Area Source Emissions	6.84	0.08	9.93	0.00	0.02	0.01		
Energy Emissions	0.07	1.19	1.00	0.01	0.09	0.09		
Mobile Emissions	1.16	18.94	22.73	0.18	8.00	2.27		
Off-Road Emissions	5.72	15.58	90.81	0.02	0.51	0.39		
Total Emissions	13.79	35.79	124.47	0.21	8.62	2.76		
Net Emissions (Project Minus Airport Specific Plan)-3.38-7.4552.62-0.19-8.71-2.31								
SCAQMD Threshold	55	55	550	150	150	55		
Exceeds Threshold?	No	No	No	No	No	No		
ROG = Reactive Organic Gases; NO _X =	ROG = Reactive Organic Gases; NO _x = Nitrogen Oxides; CO = Carbon Monoxide; SO ₂ = Sulfur Dioxide; PM_{10} = Particulate Matter 10 microns							

Long-term operational emissions attributable to the Project are summarized in **Table 3.3-2: Operational Emissions**. Table 3.3-2 shows that the Project's emissions would not exceed SCAQMD thresholds.

in diameter or less; PM_{2.5} = Particulate Matter 2.5 microns in diameter or less Source: CalEEMod version 2022.1. Refer to **Appendix A** for model outputs. **Off-Road Equipment Emissions.** Because the Project is a speculative warehouse and distribution development and the final end user is not known, to be conservative it was assumed that the Project would operate 4 electric forklifts for 12 hours per day, 1 yard truck for 6 hours per day, and 1 generator for 50 hours per year.

Localized Construction Significance Analysis. The nearest sensitive receptors are the single-family residences located approximately 15 feet (5 meters) east of the site. To identify impacts to sensitive receptors, the SCAQMD recommends addressing LSTs for construction. LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003; revised 2008) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with project-specific emissions.

CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment. **Table 3.3-3: Equipment-Specific Grading Rates**, identifies the maximum daily disturbed acreage for comparison to LSTs. The appropriate source receptor area (SRA) for the localized significance thresholds is the Central San Bernardino Valley (SRA 34) since this area includes the project site. LSTs apply to CO, NO₂, PM₁₀, and PM_{2.5}. The SCAQMD produced look-up tables for projects that disturb areas less than or equal to 5 acres in size. Project construction is anticipated to disturb a maximum of 4 acres in a single day.

Table 3.3-3: Equipment-Specific Grading Rates							
Construction Phase	Equipment Type	Equipment Quantity	Acres Graded per 8-Hour Day	Operating Hours per Day	Acres Graded per Day		
Grading	Tractors	2	0.5	8	1		
	Graders	1	0.5	8	0.5		
	Dozers	1	0.5	8	0.5		
	Scrapers	2	1	8	2		
Total Acres Graded per Day 4							
Source: CalEEMod version 2022.1. Refer to Appendix A for model outputs.							

The SCAQMD's methodology states that "off-site mobile emissions from the project should not be included in the emissions compared to LSTs." Therefore, only emissions included in the CalEEMod "on-site" emissions outputs were considered. The nearest sensitive receptors are the residences located approximately 15 feet (5 meters) east of the site. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. The SCAQMD recommends that the 25-meter LSTs should be used for receptors located approximately 25 meters away or less. Therefore, the LSTs for receptors located approximately 25 meters away or less. Therefore, the LSTs for receptors located at 25 meters were used. **Table 3.3-4: Localized Significance of Construction Emissions**, presents the results of localized emissions during construction. The table shows that emissions of these pollutants on the peak day of construction would not result in significant concentrations of pollutants at nearby sensitive receptors. Significant impacts would not occur concerning LSTs during construction.
able 3.3-4: Localized Significance of Construction Emissions				
_	Maximum Pounds Per Day			L
Construction Activity	NO _x	СО	PM ₁₀	PM _{2.5}
Demolition (2024)	24.89	21.74	7.67	1.98
Site Preparation (2024)	35.95	32.93	6.71	4.10
Grading (2024)	34.29	30.17	3.84	2.28
Building Construction (2024)	11.22	13.12	0.50	0.46
Paving (2024)	7.81	10.03	0.39	0.36
Architectural Coating (2024)	0.91	1.15	0.03	0.03
Maximum Emissions	35.95	32.93	7.67	4.10
SCAQMD Localized Screening Threshold (4 acres at 25 meters)	237	1,488	12	7
Exceed SCAQMD Threshold?	No	No	No	No
NOx = nitrogen oxide; CO = carbon monoxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter				

Source: CalEEMod version 2022.1. Refer to **Appendix A** for model outputs.

Localized Operational Significance Analysis. According to the SCAQMD LST methodology, LSTs apply to the operational phase of a project only if it includes stationary sources or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., warehouse facilities). Since the Project is a warehouse and distribution development, the operational phase LST protocol is conservatively applied to both the area source and some portions of the mobile source emissions. As the nearest receptors are located approximately 15 feet (5 meters) to the east of the project site, the 25-meter LSTs for SRA 34 were used. Although the project site is approximately 11.21 acres,⁵ the 5-acre LST threshold was conservatively assumed for the Project, as the LSTs increase with the size of the site. Therefore, the 5-acre LSTs are conservative for evaluation of a 11.21-acre site.

The LST analysis only includes on-site sources. However, the CalEEMod model outputs do not separate on-site and off-site emissions for mobile sources. For a worst-case scenario assessment, the emissions shown in **Table 3.3-5: Localized Significance of Operational Emissions**, conservatively include all on-site project-related stationary sources and 10 percent of the project-related vehicle emissions since a portion of mobile sources could include trucks idling on the site. The table shows that the maximum daily emissions of these pollutants during operations would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, significant impacts would not occur concerning LSTs during operational activities.

⁵ The 5-acre LST threshold used to evaluate the Project remains conservative when evaluating the total area of disturbance (12.01 acres) because the LSTs increase with the size of the site; findings are not impacted.

Table 3.3-5: Localized Significance of Operational Emissions				
	Maximum Pounds Per Day			
Activity	NO _x	со	PM ₁₀	PM _{2.5}
On-Site and Mobile Source Emissions ¹	18.74	104.01	1.42	0.72
SCAQMD Localized Screening Threshold: (5 acres at 25 meters)	270	1,746	4	2
Exceed SCAQMD Threshold?	No	No	No	No
NOx = nitrogen oxide; CO = carbon monoxide; PM_{10} = coarse parti 1. Conservatively assumes 10 percent of mobile emissions are on	culate matter; PM; -site.	.5 = fine particulate	matter	

Source: CalEEMod version 2022.1. Refer to Appendix A for model outputs.

The project operator may be required to implement additional emission reduction strategies. Conservatively, this analysis is not taking credit for these potential reductions.

Criteria Pollutant Health Impacts. On December 24, 2018, the California Supreme Court issued an opinion identifying the need to provide sufficient information connecting a project's air emissions to health impacts or explain why such information could not be ascertained (*Sierra Club v. County of Fresno* [Friant Ranch, L.P.] [2018] Cal.5th, Case No. S219783). The SCAQMD has set its CEQA significance thresholds based on the Federal Clean Air Act, which defines a major stationary source (in extreme ozone nonattainment areas such as the South Coast Air Basin) as emitting 10 tons per year. The thresholds correlate with the trigger levels for the federal New Source Review (NSR) Program and SCAQMD Rule 1303 for new or modified sources. The NSR Program⁶ was created by the Federal Clean Air Act to ensure that stationary sources of air pollution are constructed or modified in a manner that is consistent with attainment of health-based federal ambient air quality standards. The federal ambient air quality standards with an adequate margin of safety, to protect the public health. Therefore, projects that do not exceed the SCAQMD's LSTs and mass emissions thresholds would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and no criteria pollutant health impacts.

As previously discussed, Project emissions would be less than significant and would not exceed SCAQMD thresholds (refer to Table 3.3-1 and Table 3.3-2). Localized effects of on-site Project emissions on nearby receptors were also found to be less than significant (refer to Table 3.3-4 and Table 3.3-5). The LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard. The LSTs were developed by the SCAQMD based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. The ambient air quality standards establish the levels of air quality necessary, with an adequate margin of safety, to protect public health, including protecting the health of sensitive populations such as asthmatics, children, and the elderly. As shown above, project-related emissions would not exceed the regional thresholds or the LSTs, and therefore would not exceed the ambient air quality standards. Therefore, sensitive receptors would not be exposed to criteria pollutant levels in excess of the health-based ambient air quality standards.

Carbon Monoxide Hotspots. A CO hot spot is an area of localized carbon monoxide pollution that is caused by severe vehicle congestion on major roadways, typically near intersections. The purpose of the analysis

⁶ Code of Federal Regulation (CFR) [i.e., PSD (40 CFR 52.21, 40 CFR 51.166, 40 CFR 51.165 (b)), Non-attainment NSR (40 CFR 52.24, 40 CFR 51.165, 40 CFR part 51, Appendix S).

is to verify that a project would not cause or contribute to a violation of the CO standard at intersections for which a significant impact would occur. It should be noted that the Air Basin is designated as an attainment area for State and federal CO standards; and that there has been a decline in CO emissions even though vehicle miles traveled on urban and rural roads have increased. The SCAQMD studied the four most congested intersections within the Air Basin in 2003 in order to support their CO "attainment" demonstration to the U.S. Environmental Protection Agency (U.S. EPA). The modeled intersections experienced more than 100,000 average daily trips, and SCAQMD found that even these highly-congested intersections would not cause a CO hot spot to result. Therefore, it can be reasonably inferred that CO hot spots would not be experienced at any vicinity intersections as a result of 391 additional vehicle trips attributable to the Project. Therefore, impacts would be less than significant.

Health Risk Assessment. According to the Health Risk Assessment⁷, combined construction and operations would result in a maximum cancer risk of 8.99 in one million, which would not exceed the SCAQMD threshold of 10 in one million. The highest maximum chronic hazard index associated with unmitigated DPM emissions from the Project would be 0.02, which is below SCAQMD's threshold. Therefore, impacts associated with carcinogenic risk and non-carcinogenic hazards are less than significant. It should be noted that the Health Risk Assessment assesses the Project's incremental contribution to health risk impacts, consistent with the SCAQMD guidance and methodology. The SCAQMD has not established separate cumulative thresholds and does not require combining impacts from cumulative projects. The SCAQMD considers projects that do not exceed the project-specific thresholds to generally not be cumulatively significant.⁸ Therefore, impacts related to health risk from the Project would be less than significant.

Other Emissions. The SCAQMD *CEQA Air Quality Handbook* identifies certain land uses as sources of odors. These land uses include agriculture, wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Project would not include any of these land uses. During construction-related activities, some odors (not substantial pollutant concentrations) that may be detected are those typical of construction vehicles (e.g., diesel exhaust from grading and construction equipment). These odors are a temporary short-term impact that is typical of construction projects and would disperse rapidly. The Project would not include any of the land uses that have been identified by the SCAQMD as odor sources. Therefore, the Project would not create objectionable odors.

Cumulative Impacts

The significance threshold for cumulative air quality impacts is the same as for project-specific impacts. projects that do not exceed project-specific thresholds are considered by the SCAQMD to not have a cumulatively significant impact.⁹ The Project would not result in significant operational air quality impacts including nonattainment criteria pollutants. The Project would not exceed SCAQMD construction thresholds. The Project would be consistent with the Airport Specific Plan and would not require any land use designation changes, and would therefore comply with the 2022 AQMP, which is intended to bring the Air Basin into attainment for all criteria pollutants. Therefore, the Project's contribution to regional pollutant concentrations would not be cumulatively considerable. As discussed above, the proposed

⁷ Kimley-Horn and Associates, West Coast Boulevard and Locust Avenue Warehouse Project Health Risk Assessment, November 2023.

⁸ South Coast Air Quality Management District, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, August 2003.

⁹ South Coast Air Quality Management District, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, August 2003. http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulativeimpacts-white-paper-appendix.pdf?sfvrsn=4

Project would not cause a new air quality impact to occur. Therefore, the proposed Project would not result in cumulatively considerable impacts.

Mitigation Program

The Airport Specific Plan EIR includes measures to reduce potential impacts associated with the implementation of the Airport Specific Plan. Mitigation Measures 5.9-1A through 5.9-1H, 5.9-2A, and 5.9-2B are applicable to the proposed Project.

- **MM 5.9-1A** The project shall comply with State, City, and Uniform Building Code dust control regulations, so as to prevent the soil from being eroded by wind, creating dust, or blowing onto a public road or roads or other public or private property.
- **MM 5.9-1B** Adequate watering techniques shall be employed to partially mitigate the impact of construction-generated dust particulates. Portions of the project site that are undergoing earth moving operations shall be watered such that a crust will be formed on the ground surface and then watered again at the end of the day. Unpaved construction roads shall be watered at least three times a day.
- **MM 5.9-1C** SCAQMD Rule 403, as amended, as well as City of Rialto Ordinance No. 649, Section 18, shall be adhered to, ensuring the clean up on the construction-related dirt on approach routes to the site, and the application of water and/or chemical dust retardants that solidify loose soils shall be implemented for construction vehicle access, as directed by the City Engineer. This shall include covering, watering or otherwise stabilizing all inactive soil piles (left more than 10 days) and inactive graded areas (left more than 10 days).
- **MM 5.9-1D** Any vegetative ground cover to be utilized on-site shall be planted as soon as possible to reduce the amount of open space subject to wind erosion. Irrigation shall be installed as soon as possible to maintain the ground cover and minimize blows.
- **MM 5.9-1E** Grading activity shall be suspended when local winds exceed 25 miles per hour and during first and second stage smog alerts.
- **MM 5.9-1F** All trucks shall maintain a minimum of two feet of freeboard.
- **MM 5.9-1G** All trucks hauling dirt, soil or other loose dirt material shall be covered.
- **MM 5.9-1H** All construction roads with more than 50 daily trips shall be paved.
- **MM 5.9-2A** In order to reduce emissions from the power plant providing electricity to the site and from natural gas consumed by the project's users, on-site buildings shall, at a minimum, be constructed to comply with State Energy Efficiency Standards (Title 24).
- **MM 5.9-2B** The commercial use tenants shall comply with applicable SCAQMD employer trip reduction regulations and the City's Transportation Demand Ordinance. The project shall, at a minimum, consider the following:
 - Bicycle racks, lockers and secure storage areas for bicycles
 - Marked pedestrian lanes and driver warning signs
 - Transit access, including bus turnouts

- Preferential parking zone, free parking and/or parking limits
- Site access shall avoid queuing in driveways
- Mulch, groundcover and native vegetation to reduce energy for pumping water

Conclusion

Based on the comparative analysis set forth in this Addendum, air quality impacts associated with the proposed Project would be less than those assumed and already analyzed for the project site in the previously certified Airport Specific Plan EIR. No new impacts relative to adverse air quality impacts or a substantial increase in the severity of a previously identified significant impact evaluated in the Airport Specific Plan EIR would occur. With regard to PRC Section 21166 and State CEQA Guidelines Section 15162(a), the Project would not result in any new impacts, or increase the severity of the previously identified impacts, with respect to air quality. There are no substantial changes to the circumstances under which the proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the Airport Specific Plan EIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the Airport Specific Plan EIR was certified is available that would impact the prior finding of significant unavoidable impact. Therefore, preparation of a subsequent environmental analysis is not warranted.

3.4 Biological Resources

- Threshold (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 Wildlife or U.S. Fish and Wildlife Service?
- Threshold (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 Wildlife or U.S. Fish and Wildlife Service?
- Threshold (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?
- Threshold (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?
- Threshold (e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- Threshold (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?

Summary of Impacts Identified in the Airport Specific Plan EIR

The Airport Specific Plan EIR included field surveys and documentation of sensitive species in and around the Specific Plan area. No listed or candidate sensitive plant species were observed on or around the Specific Plan area. One special status animal, the San Diego Horned Lizard, was observed within the Airport Specific Plan area. Two other sensitive species, the Orange-Throated Whiptail and California Gnatcatcher, were recorded within two miles of the boundaries of the Airport Specific Plan study area. Neither the San Diego Horned Lizard or the Orange-Throated Whiptail status met the criteria for listing as threatened or endangered; therefore, impacts to these species pursuant to CEQA were found to be less than significant. Potential impacts to the California Gnatcatcher, a federally threatened species and a California Species of Concern, were found to be less than significant with the incorporation of Mitigation Measure 5.6-3, which requires that presence/absence surveys be conducted for listed or candidate species potentially occurring within the boundaries of a proposed development, where applicable.

The Airport Specific Plan EIR did not include jurisdictional delineation of waters or wetlands but included Mitigation Measures 5.6-4a and 5.6-4b requiring developers to obtain applicable regulatory approvals from the California Department of Fish and Wildlife (CDFW), State Water Resources Control Board (SWRCB), and the U.S. Army Corps of Engineers (USACE) as required under Section 404 of the federal Clean Water Act, where applicable for sites within the Specific Plan area that contain wetlands.

The Airport Specific Plan EIR determined that the Airport Specific Plan area is not connected to, or part of, a distinct wildlife movement corridor. Therefore, mitigation related to wildlife movement corridors was not required.

Project-Specific Analysis and Significance Determination: No new impacts/reduced impact; no substantial change from previous analysis.

A Biological Technical Report was prepared by Rocks Biological Consulting in November 2023 to evaluate potential biological resources impacts associated with the Project. The report is included as **Appendix B** to this Addendum.

Special-Status Plant Species

The project site consists of developed, non-native grassland (wild oats and annual brome grassland), ornamental, and disturbed lands; none of which are considered a sensitive natural community under CEQA. No special-status plant species, including federally and/or state-listed and California Rare Plant Rank list plant species were identified on or are expected to occur on the project site. Therefore, the Project would not result in impacts on special-status plant species.

Threatened and Endangered Wildlife Species

San Bernardino Kangaroo Rat. San Bernardino kangaroo rat is a federally endangered and a State endangered species that is most commonly associated with alluvial fan scrub habitat. Alluvial fan scrub is similar to Riversidian sage scrub but also supports some riparian species. Some characteristic species of this habitat include scale-broom (*Lepidospartum squamatum*), California buckwheat (*Eriogonum fasciculatum*), white sage (*Salvia apiana*), and mulefat (*Baccharis salicifolia*). This species has historically been recorded along the Lytle Creek wash which is approximately one mile north of the project site; however, the species has not been detected in the area since 2015. The project site does not overlap the critical habitat for San Bernardino kangaroo rat. This species has a very low potential to occur within the project site due to the lack of suitable habitat including alluvial fan scrub, the lack of suitable soil for burrowing, and absence of recent local occurrences.

Other Special-Status Wildlife Species

Burrowing Owl. The burrowing owl is listed as a Species of Special Concern by the CDFW. The project site is within the Burrowing Owl Overlay Zone. No burrowing owl individuals or active sign were observed during the general biological survey. The project site and the surrounding area is largely disturbed and/or developed, which limits foraging opportunities for this species. The on-site non-native grassland and disturbed land may be marginally suitable for burrowing owl but are limited in size. Although California ground squirrels and debris piles are present on site, no burrows suitable for burrowing owl were observed during the general biological survey. In addition, during the general biological survey, on-site vegetation was tall and dense, which generally precludes burrowing owl occupancy due to their preference for a commanding view of the land surrounding their burrows. If weed abatement or disking is performed, the on-site non-native grassland may become more suitable for burrowing owl nesting and foraging and this species' potential to occur may become moderate. However, given the existing conditions of the project site during the general biological survey, burrowing owl has low potential to occur within the project site.

California Horned Lark. California horned lark is a CDFW Species of Special Concern. Although California horned lark was not observed within the project site during biological surveys, this species in known to occur in the area. California horned lark has a moderate potential to occur is based on the presence of suitable foraging and nesting habitat within and around the project site.

Cooper's Hawk. Cooper's hawk is a CDFW Watch List species when nesting. Although Cooper's hawk was not observed during biological surveys, its potential to occur is moderate for both nesting and foraging based on the presence of suitable ornamental trees on the project site and adjacent lands, and its ability to inhabit urban environments.

Nesting Birds

The proposed Project has the potential to impact active bird nests if vegetation is removed or ground disturbing activities are initiated during the nesting season. The non-native grasslands, ornamental, disturbed, and developed lands within the project site have the potential to support avian nests and impacts on nesting birds are prohibited by the Migratory Bird Treaty Act (MBTA) and/or California Fish and Game Code Section 3503, which states that it is unlawful to "take, possess, or needlessly destroy" avian nests or eggs. It is preferable to remove habitat occur outside of the breeding season (generally February 15 through August 31). If vegetation removal cannot occur outside of the breeding season, a qualified biologist would survey the area prior to the initiation of construction. If active nests are found, construction activities in the area containing the active nest plus an appropriate buffer (determined by the qualified biologist in consultation with CDFW) would be delayed until nestlings have fledged. Consistent with the City's standard conditions and in compliance with the MBTA and California Fish and Game Code, no significant impacts to nesting birds would occur.

Riparian Resources

No aquatic resources were identified during desktop review of the U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) and U.S. Geological Survey (USGS) National Hydrography Dataset (NHD) databases. During the constraints-level aquatic resources assessment, no aquatic resources potentially jurisdictional by the U.S./State were observed.

Wildlife Movement and Wildlife Corridors

With respect to wildlife movement and wildlife corridors, a wildlife corridor can be defined as a physical feature that links wildlife habitat, often consisting of native vegetation that joins two or more larger areas of similar wildlife habitat. Based on a review of the CDFW Biogeographic Information and Observation System data, the project site functions as part of a Rank 3, "Connections with Implementation Flexibility" which is a mid-tier rank within the Terrestrial Connectivity, Areas of Conservation Emphasis (ACE) dataset. Areas with this rank could have connectivity importance dependent on future changes in the surrounded land use but are not considered to be habitat linkages or species corridors at this time. A Natural Landscape Block and an Essential Connectivity Area, as identified in the California Essential Habitat Connectivity dataset, are found approximately one half of a mile north of the project site; however, these important connectivity areas do not extend to the project site.

Local Policies and Ordinances

The proposed Project would not conflict with any local policies or ordinances protecting biological resources. The City does not have a tree preservation ordinance applicable to trees on private property.

Habitat Conservation Plans and Natural Community Conservation Plans

The project site is not located with an active Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP) area; therefore, the Project would not result in impacts on HCPs or NCCPs.

With respect to the project site, the Airport Specific Plan EIR did not identify the presence of sensitive biological resources, including wetlands and riparian habitat. The proposed Project is consistent with the

development contemplated in the Airport Specific Plan EIR, and therefore the proposed Project would not have any impacts on biological resources that are different than those considered and addressed in the Airport Specific Plan EIR. The land use designation for the project site in the Airport Specific Plan is Planned Industrial Development (I-PID). Therefore, the biological resources analysis in the Airport Specific Plan EIR assumed that the site would be developed. Further, the project site has been previously disturbed, consisting of partially developed land featuring construction equipment storage in the southern portion of the project site. The proposed Project would not have an effect, either directly or through habitat modifications, on any species identified as a candidate, as a sensitive, or as a special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. The project site is partially paved with limited vegetation consisting of ornamental landscaping along the northern, eastern, and western boundaries, and non-native grassland. There are no natural habitats on the project site. Because of the disturbed nature of the project site, there is no suitable habitat for any protected species.

Additionally, because the project site has been disturbed by prior grading and paving, there are no drainages, riparian habitat, aquatic features, or jurisdictional waters or wetlands on the project site.

Consistent with the findings of the Airport Specific Plan EIR, the Airport Specific Plan area is not connected to, or part of, a distinct wildlife movement corridor. The project site is located in a predominately industrial and residential area and is not suitable as a wildlife movement corridor.

Further, the proposed Project would not conflict with any local policies or ordinances protecting biological resources, as the project site has been subject to disturbance and development and there are no identified biological resources that are subject to such regulation. The project site is not subject to a HCP or NCCP. Therefore, Mitigation Measures 5.6-3, 5.6-4A, and 5.6-4B are not applicable to the proposed Project because the project site does not include suitable habitat for candidate species or potentially jurisdictional waters or wetlands.

Accordingly, no new impacts relative to adverse effects related to biological resources that would substantially increase the severity of a previously identified impact evaluated in the Airport Specific Plan EIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the Airport Specific Plan EIR was certified is available that would impact the prior finding of less than significant with mitigation incorporated.

Cumulative Impacts

Proposed projects are required to implement measures, as set forth in their respective CEQA documents, consistent with federal, State, and local regulations to avoid adverse effects to existing biological resources or to mitigate for significant impacts to these resources. The types of measures required for projects impacting protected habitat, species, and regulated resources can include avoidance, project design features, regulatory approvals, and mitigation measures. As it applies to the proposed Project, the project site does not contain riparian habitat or any other water resources. Additionally, the project site does not contain sensitive habitat or sensitive species or waters, including wetland waters, which are subject to federal jurisdiction under Section 404 of the Clean Water Act. The project site is not located within an HCP or NCCP, which may support species and habitats that are sensitive and rare within the region or may function as a migration corridor for wildlife. Therefore, the proposed Project would not contribute to a cumulative effect on biological resources including sensitive species, protected habitat, or wetland resources. The proposed Project would not cause a new biological impact to occur, nor an increase in the severity of a biological impact previously disclosed in the Airport Specific Plan EIR.

Implementation of the proposed Project would not alter the conclusions of the Airport Specific Plan EIR analysis and would not result in a new or substantially more severe project-specific or cumulative biological resources impact than those already analyzed.

Mitigation Program

Mitigation Measures 5.6-3, 5.6-4A, and 5.6-4B are not applicable to the proposed Project because the project site has a low potential for special-status species to occur on-site and no jurisdictional waters or wetlands are present within the project site. The following standard conditions are applicable to the proposed Project.

SC BIO-1A: No less than 14 days prior to the onset of construction activities, a qualified biologist shall survey the construction limits of the project site and a 500-foot buffer for the presence of burrowing owls and occupied nest burrows. A second survey shall be conducted within 24 hours prior to the onset of construction activities. The surveys shall be conducted in accordance with the most current CDFW survey methods. If burrowing owls are not observed during the clearance survey, no additional conditions may be required to avoid impacts to burrowing owl.

If burrowing owl is documented on site, occupied burrowing owl burrows shall not be disturbed during the nesting season (February 1 through August 31) unless a qualified biologist approved by CDFW verifies through non-invasive methods that either the birds have not begun egg laying and incubation, or that juveniles from the occupied burrows are foraging independently and capable of independent survival. Disturbance avoidance buffers shall be determined and set up by a qualified biologist in accordance with the recommendations included in the Staff Report on Burrowing Owl Mitigation. A biologist shall be contracted to perform monitoring during all construction activities approximately every other day. The definitive frequency and duration of monitoring shall be dependent on whether it is the breeding versus non-breeding season and the efficacy of the exclusion buffers, as determined by a qualified biologist and in coordination with CDFW.

If burrowing owl is observed during the non-breeding season (September 1 through January 31) or confirmed to not be nesting, a non-disturbance buffer between the project activities and the occupied burrow shall be installed by a qualified biologist in accordance with the recommendations included in the Staff Report on Burrowing Owl Mitigation.

The project applicant shall submit at least one burrowing owl preconstruction survey report to the satisfaction of the City of Rialto and CDFW to document compliance with this standard condition. For the purposes of this standard condition, 'qualified biologist' is a biologist who meets the requirements set forth in the Staff Report on Burrowing Owl Mitigation.

SC BIO-1B: If avoidance is not possible, either directly or indirectly, a Burrowing Owl Relocation and Mitigation Plan (Plan) shall be prepared and submitted for approval by CDFW. Once approved, the Plan would be implemented to relocate non-breeding burrowing owls from the project site. The Plan shall detail methods for passive relocation of burrowing owls from the project site, provide guidance for the monitoring and management of the replacement burrow sites and associated reporting requirements, and ensure that a minimum of two suitable, unoccupied burrows are available off site for every burrowing

owl or pair of burrowing owls to be passively relocated. Compensatory mitigation of habitat would be required if occupied burrows or territories occur within the permanent impact footprint. Habitat compensation shall be approved by CDFW and detailed in the Burrowing Owl Relocation and Mitigation Plan.

- SC BIO-2: To ensure compliance with CFGC sections 3503, 3503.5, and 3513 and to avoid potential impacts to nesting birds, vegetation clearing and ground-disturbing activities shall be conducted outside of the bird nesting season (generally February 15 through August 31). If avoidance of the nesting season is not feasible, then a qualified biologist will conduct a nesting bird survey within three (3) days prior to any disturbance of the site, including but not limited to vegetation clearing, disking, demolition activities, and grading. If active nests are identified, the biologist shall establish suitable buffers around the nests depending on the level of activity within the buffer and species observed, and the buffer areas shall be avoided until the nests are no longer occupied, and the juvenile birds can survive independently from the nests. During construction activities, the qualified biologist shall continue biological monitoring activities at a frequency recommended by the qualified biologist using their best professional judgment. If nesting birds are documented, avoidance and minimization measures may be adjusted, and construction activities stopped or redirected by the qualified biologist using their best professional judgement to avoid take of nesting birds. If nesting birds are not documented during the preconstruction survey, adherence to additional standard conditions may not be necessary to avoid impacts to nesting birds.
- **SC BIO-3:** 1) To prevent inadvertent disturbance to areas outside the limits of work, the construction limits shall be clearly demarcated (e.g., installation of flagging or temporary visibility construction fence) prior to ground-disturbance activities, and all construction activities, including equipment staging and maintenance, shall be conducted within the marked disturbance limits. The work limit delineation shall be maintained throughout project construction.

2) Construction vehicles shall not exceed 15 miles per hour on unpaved roads adjacent to the project site or the right-of-way accessing the site.

3) Construction activities will occur during daytime hours.

4) If trash and debris need to be stored overnight during maintenance activities, fully covered trash receptacles that are animal-proof and weather-proof will be used by the maintenance contractor to contain all food, food scraps, food wrappers, beverage containers, and other miscellaneous trash. Alternatively, standard trash receptacles may be used during the day, but must be removed each night.

5) The operator will not permit pets on or adjacent to construction sites.

6) At the end of each workday during construction, the applicant, or its contractors, will cover all excavated, steep-sided holes or trenches more than eight inches deep and that have sidewalls steeper than 1:1 (45 degree) slope with plywood or similar materials, or provide a minimum of one escape ramp per 100 feet of trenching (with slopes no greater than 3:1) constructed of earth fill or wooden planks. The project biologist will thoroughly inspect holes and trenches for trapped animals during biological monitoring.

7) The applicant, or its contractors, will screen, cover, or elevate at least one (1) foot above ground, all construction pipe, culverts, or similar structures with a diameter of three (3) inches or greater that are stored on site overnight. These pipes, culverts, and similar structures will be inspected by the project biologist for wildlife before such material is moved, buried, or capped.

Conclusion

Based on the comparative analysis set forth in this Addendum, no new impacts relative to biological resources or a substantial increase in the severity of a previously identified significant impact evaluated in the Airport Specific Plan EIR would occur. With regard to PRC Section 21166 and State CEQA Guidelines Section 15162(a), the Project would not result in biological impacts, or increase the severity of the previously identified impacts for the Airport Specific Plan area. There are no substantial changes to the circumstances under which the proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the Airport Specific Plan EIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the Airport Specific Plan EIR was certified is available that would impact the prior finding. Therefore, preparation of a subsequent environmental analysis is not warranted.

3.5 Cultural and Tribal Cultural Resources

- Threshold (a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?
- Threshold (b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?
- Threshold (c) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Summary of Impacts Identified in the Airport Specific Plan EIR

The Airport Specific Plan EIR included an archaeological assessment to locate, record, and evaluate potentially significant historic and archaeological resources in the Airport Specific Plan area. The assessment did not identify previously recorded prehistoric archaeological resources or Native American tribal resources or sites within the Airport Specific Plan area. However, the Airport Specific Plan EIR determined that development under the Airport Specific Plan could result in the disturbance of unknown prehistoric archaeological or Native American tribal resources or sites. The Airport Specific Plan also noted that unknown historic archaeological sites could be disturbed as a result of implementation.

Accordingly, Mitigation Measures 5.7-2A, 5.7-2B, 5.7-3A, 5.7-3B, and 5.7-3C address archaeological and tribal cultural resources. These measures include monitoring during grading in areas identified as having archaeologic sensitivities, and retention of a qualified archaeologist to conduct field reconnaissance to determine if cultural remains of historical or prehistorical origin are present on the site and protocols in the event that cultural resources of historic or prehistoric origin are exposed during grading or construction and to perform inspections of excavations. The Airport Specific Plan EIR found that implementation of these mitigation measures would reduce potential impacts to prehistoric and historic archaeological resources to a less than significant level.

Project-Specific Analysis and Significance Determination: No new impacts; no substantial change from previous analysis.

The South Central Coastal Information Center (SCCIC) prepared a records search for the project site and summarized their findings in a letter included as **Appendix C**. The SCCIC determined that there are currently no recorded archaeological sites within the project site. The Project is consistent with the assumptions set forth in the Airport Specific Plan EIR, which assumed development of the project site with industrial-related uses. Although the project site has been disturbed, consistent with the findings of the Airport Specific Plan EIR, there is a potential for previously unknown archeological and tribal cultural resources to be uncovered during ground-disturbing activities. Mitigation Measures 5.7-2A, 5.7-2B, 5.7-3A, 5.7-3B, and 5.7-3C are applicable.

The project site is not located within a known or suspected cemetery and there are no known human remains within the project site. However, this does not preclude the discovery of human remains during project-related ground disturbance. In compliance with State regulations, should any human remains be encountered during construction activities, State Health and Safety Code Section 7050.5 states that no further disturbances shall occur in the immediate area until the County Coroner has made the necessary findings as to origin and disposition pursuant to California PRC Section 5097.98. In addition, in accordance with State and local guidelines, if the Coroner determines the remains to be Native American, the Coroner must contact the Native American Heritage Commission within 24 hours for identification of the most

likely descendent of the deceased Native American. Additionally, if the remains are determined to be Native American, the City would work with local Native American representatives to ensure that the remains and any associated artifacts are treated in a respectful and dignified manner. Although the potential for disturbance of undiscovered resources during grading and excavation activities is considered low, incorporation of the Airport Specific Plan EIR mitigation measures below would reduce this potential impact to a level considered less than significant.

Accordingly, no new known impacts relative to adverse effects related to archeological and tribal cultural resources would substantially increase the severity of a previously identified potential impact evaluated in the Airport Specific Plan EIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the Airport Specific Plan EIR was certified is available that would impact the prior finding of less than significant with mitigation.

Cumulative Impacts

As discussed above, the Project would not cause a known cultural resources impact to occur, nor an increase in the severity of a potential archeological or tribal cultural resources impact previously disclosed in the Airport Specific Plan EIR, with adherence to State and local regulations and mitigation measures discussed in this section. Implementation of the Project would not alter the conclusions of the Airport Specific Plan EIR analysis and would not result in a new or substantially more severe project-specific or cumulative cultural resources impact than those already analyzed.

Mitigation Program

Mitigation Measures 5.7-2A, 5.7-2B, 5.7-3A, 5.7-3B, and 5.7-3C from the Airport Specific Plan EIR are applicable to the Project.

- **MM 5.7-2A** As part of the project review process for development projects in the Specific Plan area, the City shall require a Cultural Resources Impact Analysis. This analysis shall address prehistoric and historic archaeological resources, as well as potential historic structures, and shall include mitigation measures, if necessary.
- **MM 5.7-2B** Archaeologic monitoring shall be required during grading in those areas identified archaeologic sensitivities, per the requirements of the City and/or County.
- **MM 5.7-3A** Prior to the issuance of grading permits, project applicants shall retain a qualified archaeologist to conduct a complete field reconnaissance to determine if cultural remains of historical or prehistorical origin are present on-site. If additional sites are found, the archaeologist shall recommend measures to reduce impacts to less than significant levels which may include salvaging, restoration, etc. The report shall be submitted to the City of Rialto Development Services Department for review and approval.
- **MM 5.7-3B** If cultural resources of historic or prehistoric origin are exposed during grading or construction, a qualified archaeologist, at the discretion of the City of Rialto, shall be allowed to divert or direct grading in the area so as to facilitate salvage and evaluation.
- **MM 5.7-3C** A qualified archaeologist shall be retained to perform inspections of excavations and, if necessary, salvage exposed cultural resources. The frequency of inspections will depend on the rate of excavation, the materials being excavated, and the abundance of cultural resources. Initially, monitoring shall be full-time during grading.

Conclusion

Based on the comparative analysis set forth in this Addendum, no new impacts relative to cultural or tribal cultural resources or a substantial increase in the severity of a previously identified potential significant impact evaluated in the Airport Specific Plan EIR would occur. With regard to PRC Section 21166 and State CEQA Guidelines Section 15162(a), the Project would not result in any new impacts, or increase the severity of the previously identified potential impacts. There are no substantial changes to the circumstances under which the Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the Airport Specific Plan EIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the Airport Specific Plan EIR was certified is available that would impact the prior finding of less than significant with mitigation. Therefore, preparation of a subsequent environmental analysis is not warranted.

3.6 Energy

- Threshold (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?
- Threshold (b) Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Summary of Impacts Identified in the Airport Specific Plan EIR

Impacts related to energy were not analyzed in the Airport Specific Plan EIR because they were not on the State CEQA Guidelines' Appendix G checklist until January 1, 2019, which was subsequent to the certification of the Airport Specific Plan EIR. Therefore, the analysis of energy is new in this Addendum. Energy modeling calculations are provided in **Appendix D**.

However, the Airport Specific Plan EIR did include an analysis of the impacts on other public services and utilities, which included electricity and natural gas. Specifically, the analysis was in Section 5.12, Public Utilities, of the Airport Specific Plan EIR. As concluded in the Airport Specific Plan EIR, impacts to electricity and natural gas services were found to be less than significant with the implementation of Mitigation Measure 5.12-6. The electricity and natural gas analysis in the Airport Specific Plan EIR did not address the specific questions now included in Appendix G of the State CEQA Guidelines. However, the analysis, as applicable, is carried through to this new Energy section for context, discussion, and comparison purposes.

Project-Specific Analysis and Significance Determination: No new impacts; no substantial change from previous analysis.

Energy consumption associated with the proposed Project is summarized in **Table 3.6-1: Project and Countywide Energy Consumption.** Estimated Project energy consumption has been compared to Countywide consumption because energy conservation plans and goals are generally discussed on a regional level. This comparison is included for informational purposes to provide context on the Project's potential demand in relation to local and regional energy supplies and is not the basis for the significance determination. As shown in the table, the Project's increase in electricity and natural gas usage would constitute an approximate 0.0084 percent and 0.0079 percent increase in typical annual electricity and natural gas usage respectively. Construction-related off-road automotive fuel consumption (i.e., fuel consumed during construction) would result in a 0.0330 percent increase in diesel and 0.0014 percent increase in gasoline consumption. During operations, on-road automotive fuel consumption (i.e., fuel consumed from operational vehicle trips to and from the project site) would result in a 0.1462 percent increase in diesel and 0.0153 percent increase in gasoline over Countywide automotive fuel consumption.

The land use designation for the project site in the Airport Specific Plan is Planned Industrial Development (I-PID). Warehouses are a permitted use in the I-PID. As discussed above, impacts related to energy were not analyzed in a separate section of the Airport Specific Plan EIR. The Airport Specific Plan assumed a maximum FAR of 0.7:1 for Planned Industrial Development. The total area of the proposed project site is 488,624 sf, which at a 0.7:1 FAR would result in a maximum allowable building size of 342,037 sf, which is 116,864 sf less than what was assumed for the project site in the Airport Specific Plan EIR. Accordingly, the proposed Project would result in less intense development than what was previously analyzed for the project site in the Airport Specific Plan EIR. As such, the proposed development would require less fuel (due to the generation of fewer trips) and require less energy to operate than assumed for the project

site in the Airport Specific Plan EIR. Therefore, energy impacts associated with the proposed Project would be less than those assumed for the project site in the Airport Specific Plan EIR.

Construction-Related Energy

During construction, the Project would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Fossil fuels used for construction vehicles and other energy-consuming equipment would be used during grading, paving, and building construction. Fuel energy consumed during construction would be temporary in nature and would not represent a significant demand on energy resources. Some incidental energy conservation would occur during construction through compliance with State requirements that equipment not in use for more than five minutes be turned off. Project construction equipment would also be required to comply with the latest U.S. EPA and California Air Resources Board engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Due to increasing transportation costs and fuel prices, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction.

Table 3.6-1: Project and Countywide Energy Consumption			
Energy Type	Project Annual Energy Consumption	San Bernardino County Annual Energy Consumption ^{1,2}	Percentage Increase Countywide
Operational Electricity			
Electricity Consumption	1,394,538 kWh	16,629,614,195 kWh	0.0084%
Automotive Fuel Consumption ³			-
Project Construction ^{4,5}			
Diesel	42,305 gallons	128,177,700 gallons	0.0330%
Gasoline	7,047 gallons	499,936,000 gallons	0.0014%
Project Operations			
Diesel	187,405 gallons	128,177,700 gallons	0.1462%
Gasoline	76,564 gallons	499,936,000 gallons	0.0153%

1. The Project increases in electricity is compared with the total consumption in San Bernardino County in 2022.

2. The Project increases in automotive fuel consumption are compared with the countywide fuel consumption (projected) in 2024.

3. Countywide fuel consumption is from the California Air Resources Board EMFAC2021 model.

4. Construction fuel consumption is based on equipment and load factors from California Emissions Estimator Model (CalEEMod version 2022.1).

5. The estimated construction fuel consumption is based on the Project's construction equipment list timing/phasing, and hours of duration for construction equipment, as well as vendor, hauling, and construction worker trips.

Refer to **Appendix D**: Energy Data for assumptions used in this analysis.

The California Air Resources Board (CARB) adopted the Airborne Toxic Control Measure (ATCM) to Limit Diesel-Fueled Commercial Motor Vehicle Idling (Title 13 CCR §2485) in 2004 and the In-Use Off-Road Diesel-Fueled Fleets regulation in 2007. Compliance with these goals has shown energy savings in the form of reduced fuel consumption from more fuel-efficient engines. Project construction equipment would be required to comply with the latest U.S. EPA and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Due to increasing transportation costs and fuel prices, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction.

As indicated in Table 3.6-1, the overall diesel fuel consumption during construction of the Project is estimated to be 42,305 gallons and gasoline consumption would be 7,047 gallons, which would result in a nominal increase (0.0330 percent and 0.0014 percent, respectively) in fuel use in the County. As such, Project construction would have a minimal effect on the local and regional energy supplies and is anticipated to be less than the assumptions for development of the project site as set forth in the Airport Specific Plan EIR because less development is proposed and increased fuel efficiency standards for onroad and off-road vehicles. Since the certification of the Airport Specific Plan EIR, the U.S. EPA and CARB have implemented off-road equipment emissions standards. These emissions standards have been phased in since 1996 in four distinct tiers. Each tier establishes new and more stringent emissions standards. The tier of an engine depends on the model year and horsepower rating; generally, the newer a piece of equipment is, the greater the tier it is likely to have. Beginning in 2011, new off-road mobile engines sold that are equal to or greater than 175 horsepower and non-emergency stationary engines less than 10 liters per cylinder and equal to or greater than 175 horsepower were required to meet Tier 4 Interim. Beginning in 2014, new off-road mobile engines sold that are equal or greater than 130 horsepower were required to meet Tier 4 Final standards (40 Code of Federal Regulations, Part 1039). Construction equipment that now meets these standards are also more fuel efficient because they are more precise and allow for more complete and efficient combustion. The construction equipment fleet associated with Project construction would be newer than what was anticipated in the 1997 Airport Specific Plan EIR and would therefore be more fuel efficient. It is noted that construction fuel use is temporary and would cease upon completion of construction activities. There are no unusual Project characteristics that would necessitate the use of construction equipment that would be less energyefficient than at comparable construction sites in the region or State. Therefore, construction fuel consumption would not be inefficient, wasteful, or unnecessary compared with other similar development projects of this nature. A less than significant impact would occur.

Operational Energy: Energy Demand

Transportation Energy Demand. Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration is responsible for establishing additional vehicle standards and for revising existing standards. Compliance with federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States. Table 3.6-1 provides an estimate of the daily fuel consumed by vehicles traveling to and from the project site. As indicated in the table, Project operations are estimated to consume approximately 187,405 gallons of diesel fuel and 76,564 gallons of gasoline fuel per year, which would increase Countywide automotive fuel consumption by 0.1462 percent and 0.0153 percent, respectively. The Project would not result in any unusual characteristics that would result in excessive long-term operational fuel consumption. Fuel consumption associated with vehicle trips generated by the Project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

Building Energy Demand. Operational activities associated with proposed Project would require approximately 1,394,538 kWh of electricity per year. No natural gas infrastructure would be extended to the project site. The proposed Project would be required to comply with Title 24 Building Energy Efficiency Standards, which provide minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Implementation of the Title 24 standards significantly reduces energy usage. Further, the electricity provider, SCE, is subject to California's Renewables Portfolio Standard (RPS). The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020 and to 50 percent of total procurement by 2030. Renewable energy is generally defined as energy that comes from resources which are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat. The increase in reliance of such energy resources further ensures projects will not result in the waste of the finite energy resources.

Operational energy consumption would represent an approximate 0.0084-percent increase in electricity consumption over the current Countywide usage (refer to Table 3.6-1). The Project would adhere to all federal, State, and local requirements for energy efficiency, including the Title 24 standards. Title 24 of the California Code of Regulations contains energy efficiency standards for residential and non-residential buildings based on a State mandate to reduce California's energy demand. Specifically, Title 24 addresses a number of energy efficiency measures that impact energy used for lighting, water heating, heating, and air conditioning, including the energy impact of the building envelope such as windows, doors, skylights, wall/floor/ceiling assemblies, attics, and roofs. As such, the Project would not result in the inefficient, wasteful, or unnecessary consumption of building energy.

The City of Rialto Climate Action Plan (Rialto CAP) establishes a series of energy efficiency related goals intended to reduce greenhouse gas (GHG) emissions based on the Assembly Bill (AB) 32 Scoping Plan. Those applicable to the Project are Renewables Portfolio Standard for Building Energy Use, AB 1109 Energy Efficiency Standards for Lighting, Electricity Energy Efficiency, and Commercial Energy Efficiency Requirements.

The Project would not conflict with any of the federal, State, or local plans for renewable energy and energy efficiency. Because the Project would comply Title 24 and with City of Rialto CAP measures, no conflict with existing energy standards and regulations would occur. Therefore, impacts associated with renewable energy or energy efficiency plans would be considered less than significant.

Cumulative Impacts

As discussed above, the proposed Project would not cause an energy impact to occur. Implementation of the proposed Project would not result in significant unavoidable energy impacts and would therefore not result in a new or substantially more severe project-specific or cumulative energy impact than those already analyzed. The Project's contribution to energy use would be less than cumulatively considerable.

Mitigation Program

Mitigation Measure 5.12-6 of the Airport Specific Plan EIR related to energy conservation is applicable to the Project.

MM 5.12-6 All construction shall be done within the guidelines established by State building regulations and the Uniform Building Code (UBC) as they relate to energy conservation

including such measures as solar heating for water and the use of landscaping to shade buildings.

Conclusion

Based on the comparative analysis set forth in this Addendum, no new impacts relative to energy or a substantial increase in the severity of a previously identified significant impact evaluated in the Airport Specific Plan EIR would occur. With regard to PRC Section 21166 and State CEQA Guidelines Section 15162(a), the Project would not result in any new impacts, or increase the severity of the previously identified impacts. There are no substantial changes to the circumstances under which the proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the Airport Specific Plan EIR. Additionally, no new information of substantial importance is known that would impact the prior finding of less than significant with mitigation. The proposed Project would have a less than significant impact on energy. Therefore, preparation of a subsequent environmental analysis is not warranted.

3.7 Geology and Soils

- Threshold (a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving the:
 - 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?
- Threshold (b) Would the project result in substantial soil erosion or the loss of topsoil?
- Threshold (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?
- Threshold (d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?
- Threshold (e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?
- Threshold (f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Summary of Impacts Identified in the Airport Specific Plan EIR

Geology and soil resources are addressed in Section 5.3, Geology, Soils and Seismicity, of the Airport Specific Plan EIR. The Airport Specific Plan EIR noted that there are no faults across the Airport Specific Plan area. However, Rialto, like most areas of Southern California, is located in a seismically active region. The presence of several active faults in Southern California could result in strong seismic shaking (horizontal ground accelerations). The Airport Specific Plan EIR included Mitigation Measures 5.3-1A through 5.3-1D that require future development comply with the seismic design requirements of the Uniform Building Code (subsequently referred to as the California Building Code) and conduct a geotechnical investigation. Impacts were determined to be less than significant with mitigation.

Impacts related to liquefaction were not identified as a potential hazard due to the depth of the water table. Potential impacts related to soil erosion were reduced to a less than significant level with implementation of Mitigation Measure 5.3-2A requiring future development provide approved Erosion Control Plans with measures such as the placement of sandbags if grading is set to occur from October to March, minimizing the length of time that soil is exposed, and using hydroseeding or other similar methods to encourage revegetation of graded areas planed for development in subsequent phases. Implementation of measures related to compliance with seismic design parameters from the California Building Code would reduce impacts. Additional measures include the preparation of a geotechnical investigation, a requirement that building plans are reviewed for seismic design by a qualified

professional, and a requirement that building plans are reviewed and approved by the City's Building and Safety Department.

At the time that the Airport Specific Plan EIR was prepared, the State CEQA Guidelines checklist addressed paleontological resources as a part of Cultural Resources. Paleontological resources are addressed in Section 5.7, Cultural Resources, of the Airport Specific Plan EIR. The Airport Specific Plan EIR noted that the Airport Specific Plan area is underlain by surficial deposits of varying thickness of Older Quaternary Alluvium and Recent Alluvium. The paleontological sensitivity of Older Quaternary Alluvium is moderate to high and the paleontological sensitivity of and Recent Alluvium is low. The Airport Specific Plan found that potentially fossiliferous geologic units underlie the entire Airport Specific Plan area and excavations in and at all depths of the quaternary deposits should be expected to produce significant vertebrate fossils.

Accordingly, the Airport Specific Plan EIR identified pre-construction measures, Mitigation Measures 5.7-1A, 5.7-1B, and 5.7-1C, which require the retention of a Certified Vertebrate Paleontologist (CVP), preparation of a paleontological resource monitoring program, and the presence of the CVP at a pregrading conference to explain the procedures related to the paleontological resource monitoring program. Mitigation Measures 5.7-1D through 5.7-1J, identify procedures related to paleontological field monitoring and protocols in the event of fossil discovery during construction. Mitigation Measures 5.7-1K and 5.7-1L require projects to provide a Final Paleontological Resources Report of Findings. The Airport Specific Plan EIR found that implementation of these mitigation measures reduced potential impacts to paleontological resources to a less than significant level.

Project-Specific Analysis and Significance Determination: No new impact; no substantial change from previous analysis.

The Airport Specific Plan and Airport Specific Plan EIR assumed the development of the project site with industrial land uses. As such, the findings for the proposed Project are consistent with the Airport Specific Plan EIR. According to the Geotechnical Report prepared for the proposed Project (see **Appendix E**), the project site is not located within an Alquist-Priolo Earthquake Fault Zone and there are no known active faults in the vicinity of the site. The nearest fault to the project site is the San Jacinto Fault, located approximately 1.7 miles to the east and the Cucamonga Fault located approximately 2.7 miles to the west.¹⁰ The Geotechnical report noted that due to distance from an active fault potential for surface fault rupture is considered low to moderate.

Project construction would be required to conform to the seismic design requirements of the 2022 California Building Code and California Health and Safety Code (or applicable adopted codes at the time of plan submittal or grading and building permit issuance for construction). The building and safety standards established by these codes have been developed to address structural integrity during a seismic event. State laws and local ordinances require that, prior to construction, potential seismic hazards be identified and mitigated, as needed, to protect public health and safety from substantial risks through appropriate engineering practices. Additionally, the Project would need to comply with the City of Rialto Municipal Code Chapter 11.12, Excavations and Fills, which requires approval of a soil engineering and engineering geology report. The Excavation and Grading Code also requires that recommendations

¹⁰ Department of Conservation. July 2023. Earthquake Zones of Required Investigation. https://maps.conservation.ca.gov/cgs/eqzapp/app/.

included in the reports and approved by the development services and public works departments be incorporated in the grading plans or specifications.

As determined by the Geotechnical Report, the project site is not located within the areas susceptible to liquefaction or ground failure. The Geotechnical Report indicated that the liquefaction potential of the site is considered to be low due based on groundwater depth records, soil type, and distance to an active fault. There are no known geologic conditions on the project site that would render development infeasible. Compliance with the City's Municipal Code would reduce the risk associated with seismic-related ground failure and associated liquefaction, lateral spreading, or subsidence to a less than significant level. The Project would not result in a new specific impact or an increase in the severity of an impact that was identified in the Airport Specific Plan EIR and would therefore be consistent with the effects of implementation of the Airport Specific Plan.

The project site is located at an elevation of approximately 1,660 to 1,643 feet amsl, sloping from the northwest corner of the site to the southeast corner. The Geotechnical Report indicated that the project site is not within a landslide zone. As such, the project site is not subject to the potential for a landslide. The Project would be required to comply with all applicable building code regulations and engineering design standards related to shaking hazards and geologic stabilization. Therefore, the Project would not result in a new impact or an increase in the severity of an impact that was identified in the Airport Specific Plan EIR and would therefore be consistent with the effects of implementation of the Airport Specific Plan.

The project site has been disturbed and the southern portion of the site is paved. Consistent with the assumptions of the Airport Specific Plan EIR, disturbance of the ground surface at the project site would occur during grading of the site. The project site would be graded, and foundation excavation would require approximately 32,893 cubic yards (cy) of cut and 26,270 cy of fill, with approximately 6,623 cy of imported soil. Grading and earthwork activities during construction would expose soils to potential short-term erosion by wind and water. However, the increased erosion rates and the consequent downslope and downwind movement of sediment can be mitigated to less than significant levels by proper and strict erosion control measures enacted during grading.

All demolition and construction activities within the City are required to comply with California Building Code (CBC) standards, which would ensure implementation of appropriate measures during grading activities to reduce soil erosion. Compliance with policies in the Airport Specific Plan would further ensure that the Project would not result in substantial soil erosion or loss of topsoil. Further, compliance with the NPDES permit would minimize effects from erosion and ensure consistency with the Regional Water Quality Control Board (RWQCB) Water Quality Control Plan. The Project's impact on soil erosion would be less than significant, similar to those impacts previously analyzed in the Airport Specific Plan EIR.

The Project would be required to comply with City of Rialto Municipal Code Chapter 11.12, Excavations and Fills, which requires approval of a soil engineering and engineering geology report that includes analysis of expansive soils at the project site. The Excavation and Grading Code requires that recommendations included in the reports and approved by the Development Services and Public Works Departments be incorporated in the grading plans or specifications. Compliance with the Municipal Code and CBC regulations related to expansive soils would reduce impacts related to expansive soils to less than significant level.

The Project would connect to existing utility infrastructure and would not include septic tanks. As a result, no impacts associated with the use of septic tanks would occur as part of the proposed Project's implementation.

A search of paleontological records was conducted by the Natural History Museum of Los Angeles County (March 2023) and included as **Appendix F.** With respect to paleontological resources, and as discussed in **Appendix F,** no known fossil localities underlie the project site. However, fossil localities have been identified within the same sedimentary deposits that occur within the vicinity of the project site. As such, there is a probability that scientifically significant vertebrate fossils would be uncovered during subsurface excavation. Consistent with the Airport Specific Plan EIR, the Applicant would be required to cease grading in the event an artifact is uncovered and report the find to a qualified institution. In the event unknown paleontological resources are unearthed during construction, the Project could result in significant impacts to paleontological resources. AS such, the Project would implement Mitigation Measures 5.7-1A through 5.7-1D and 5.7-1F through 5.7-1L from the Airport Specific Plan EIR. Impacts would be less than significant, and there are no changes or new significant information that would require preparation of subsequent CEQA documentation.

Accordingly, no new impacts relative to adverse effects related to geology, soils, or paleontological resources would substantially increase the severity of a previously identified impact evaluated in the Airport Specific Plan EIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the Airport Specific Plan EIR was certified is available that would impact the prior finding of less than significant.

Cumulative Impacts

As discussed above, the Project would not cause a new geologic or paleontological impact to occur, nor an increase in the severity of an impact previously disclosed in the Airport Specific Plan EIR. As such, the Project would not cumulatively contribute to a cumulatively considerable impact related to geologic or paleontological resources.

Mitigation Program

Mitigation Measures 5.3-1A, 5.3-1B, 5.3-1C, 5.3-1D, and 5.3-2A from the Airport Specific Plan EIR associated with geology and soils are applicable to the Project. With respect to paleontological resources, Mitigation Measures 5.7-1A through 5.7-1D and 5.7-1F through 5.7-1L are applicable.

- **MM 5.3-1A** Subsequent developments shall be required to comply with the standards set forth in the Uniform Building Code (most recent edition) to assure seismic safety to the satisfaction <if the Building and Safety Department.
- **MM 5-3-1B** Prior to issuance of building permits, a structural engineer, civil engineer or architect, experienced with earthquake-resistant design, shall sign off on all building plans to determine the adequacy of seismic criteria for project structures, and to recommend appropriate design changes, if needed.
- **MM 5.3-1C** Prior to issuance of building permits, the Building and Safety Department, shall review and approve building plans to assure compliance with the latest Building Code as adopted by the City of Rialto.

- **MM 5.3-1D** Prior to the issuance of the first grading permit within each Specific Plan Planning Area (excluding the Neighborhood Commercial and residential areas), the developer shall contract with a qualified geotechnical engineer to conduct a geotechnical investigation into the soil conditions and properties for the Planning Area and shall prepare a geotechnical conditions report in a manner meeting the approval of the Building and Safety Department.
- **MM 5.3-2A** Erosion Control Plans shall be prepared and approved by the Building and Safety Department, prior to issuance of a grading permit, for projects over five acres in size. The Erosion Control Plan Shall outline methods that shall be implemented to control erosion from graded or cleared portions of the site. The erosion control measures may include one or more of the following.
 - Placing sandbags along the perimeter of the project site prior to initial grading if grading is to be undertaken during the rainy season (October to March).
 - Minimizing the length of time that soils lie exposed.
 - Revegetating (landscaping, hydro seeding or any other method of providing vegetation cover) graded areas, in a manner approved by the City if determined to be required for erosion control in areas not planned for development until subsequent phases. Landscaping and hydro-seeding should be under the direction of a licensed landscape architect and approved by the City.
- **MM 5.7-1A** Prior to the issuance of a grading permit, the project applicant shall direct a Certified Vertebrate Paleontologist (CVP) to provide written evidence (letter of verification) indicating that a CVP has been retained to monitor all earth-disturbing construction-related activities, and salvage, prepare, catalogue an4 document significant fossil finds as appropriate.
- **MM 5.7-IB** Prior to initiation of construction activity, the CVP shall prepare a paleontological resource program and procedure plan which details methods for paleontological resource surveillance (monitoring) which includes: a schedule for grading monitoring to be maintained when earth-disturbing constructiOn-related activities are being conducted within fossiliferous geologic units; assessing the significance of and need to mitigate (salvage) fossil finds; and actions to be taken in the event that significant fossils, requiring mitigation are discovered.
- **MM 5.7-1C** The City shall require that a CVP be present at the pre-grading conference to establish and explain procedures for paleontological resource surveillance, procedures for temporarily and long-term halting or redirecting work to permit sampling, identification, and evaluation of the fossils, and explain the roles and responsibilities of the CVP, field supervisors, and paleontological field monitors (staff paleontologists).
- **MM 5.7-1D** Paleontologic monitoring, supplemented by-weekly periodic in-grading supervisory inspections by the CVP (usually 1/8 of monitoring hours), shall be maintained when earth-disturbing, construction-related activities occur in any previously undisturbed Quaternary geologic unit within the study area. The monitoring levels shall be in accordance with the recommendations below. Variations (increases/decreases) in the levels of mitigation monitoring can only be determined by CVP in consultation with the City.

- Older Quaternary Alluvium Half-time monitoring; full-time when concentrations of significant fossils are encountered.
- Recent Alluvium 1/8 time; full-time when concentrations of significant fossils are encountered.
- **MM 5.7-1F** Paleontological field monitors shall be equipped to: salvage minor concentrations of fossils as they are unearthed to avoid construction delays, and/or be able to direct the removal of sediments samples which are likely to contain the remains of small and/or micro-vertebrate fossils.
- **MM 5.7-1G** Regardless of the paleontological sensitivity assigned to fossiliferous sediments, the area around all fossil localities (recorded and unrecorded) discovered during the pre-construction literature and records search or established during pre-construction surveys, quarrying operations, geotechnical investigations, or during mitigation monitoring of construction activities, shall be monitored on a full-time basis during any construction activity until the fossil locality is completely mitigated. As determined by the CVP, the area to be monitored around each fossil locality may include an area up to a maximum of 500 feet on all sides of the fossil locality, within the project grading limits.
- **MM 5.7-1H** If significant concentrations of fossils are encountered, which cannot be collected by the paleontological field monitor during normal monitoring time, salvage operations shall be initiated and completest as quickly as feasible. The salvage operations shall be conducted under the direction of the CVP, or his/her designated representative, and coordinated with the on-site grading foreman. As soon as it is feasible and reasonable, the property developer and/or City shall be notified regarding the need for, and initiation of, any paleontologic salvage operation.
- **MM 5.7-1I** If any fossil microfauna are encountered in on-site sediments (specifically small fossil vertebrates), 6,000 pounds of representative sediment samples shall be screen-washed, "floated" and/or "picked" in accordance with current SVP/SBCM protocols to recover small and/or micro-paleontologic resources.
- **MM 5.7-1J** Fossils collected during salvage and/or screen washing activities shall be curated to the point of identification. Curation involves such activities as the removal of excess matrix, specimen stabilization, time numbering, identification, cataloging, etc.) and temporary storage by the CVP until they are accessioned to the City-designated institution for permanent protection.
- MM 5.7-1K Prior to the issuance of a precise grading permit, a Final Paleontological Resources Report of Findings shall be prepared for submission, review and approval by the City and/or SBCM. The report shall include grading dates, methodologies, an itemized inventory of specimens, and analysis of the significance of encountered fossils, to the SBCM or another suitable repository with a retrievable storage system.
- **MM 5.7-1L** Upon approval of the Final Paleontological Resources Report of Findings, a copy of the final report and all curated fossils shall be accessioned to a City-designated institution, such as the SBCM, for permanent protection where they will be available for research.

Accessioning of the fossils Signifies completion of the program to mitigate impacts to paleontological resources.

Conclusion

Based on the comparative analysis set forth in this Addendum, no new impacts relative to geology and soils or paleontological resources or a substantial increase in the severity of a previously identified significant impact evaluated in the Airport Specific Plan EIR would occur. With regard to PRC Section 21166 and State CEQA Guidelines Section 15162(a), the Project would not result in any new impacts or increase the severity of the previously identified impacts. There are no substantial changes to the circumstances under which the Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the Airport Specific Plan EIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the Airport Specific Plan EIR was certified is available that would impact the prior finding of less than significant with mitigation. Therefore, preparation of a subsequent environmental analysis is not warranted.

3.8 Greenhouse Gas Emissions

- Threshold (a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- Threshold (b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Airport Specific Plan EIR

The Airport Specific Plan EIR did not evaluate the effects of greenhouse gas (GHG) emissions. At the time of the Airport Specific Plan EIR's certification in 1997, the State CEQA Guidelines did not require this topic to be analyzed. On March 18, 2010, amendments to the State CEQA Guidelines took effect which set forth requirements for the analysis of GHG emissions under CEQA. Since the Airport Specific Plan EIR has already been certified, the determination of whether GHG emissions and climate change needs to be analyzed for this specific development is governed by the law on supplemental or subsequent EIRs (PRC §21166 and CEQA Guidelines §§15162 and 15163). GHG emissions and climate change are not required to be analyzed under those standards unless it constitutes "new information of substantial importance, which was not known and could not have been known at the time" the Airport Specific Plan EIR was certified (State CEQA Guidelines §15162(a)(3)).

The issue of GHG emissions and climate change impacts is not new information that was not known or could not have been known at the time of the certification of the Airport Specific Plan EIR. The U.S. EPA publishes an annual GHG inventory (Inventory of U.S. Greenhouse Gas Emissions and Sinks),¹¹ which tracks the national trend in GHG emissions back to 1990.

Therefore, the fact that GHG emissions could have a significant adverse environmental impact was known at the time the Airport Specific Plan was approved and the Airport Specific Plan EIR was certified. Consistent with the statutory language, courts have repeatedly held that new information that "was known" or "could have been known with the exercise of reasonable diligence" at the time of EIR certification does not trigger the supplemental EIR standard (*Citizens for Responsible Equitable Environmental Development v. City of San Diego* (2011) 196 Cal.App.4th 515, 532 ("CREED II"); ALARM, supra, 12 Cal.App.4th at 1800–1803).

Although the City finds that GHG impacts and climate change is not "new information" under PRC Section 21166, the following analysis for the proposed Project is nonetheless provided for informational purposes.

Global Climate Change

Addressing GHG emissions generation impacts requires a lead agency to determine what constitutes a significant impact. The State CEQA Guidelines specifically allow lead agencies to determine thresholds of significance that illustrate the extent of an impact and are a basis from which to apply mitigation measures. This means that each agency is left to determine whether a project's GHG emissions would have a "significant" impact on the environment. The guidelines direct that agencies are to use "careful judgment" and "make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" the project's GHG emissions (14 CRC §15064.4(a)).

Due to the nature of global climate change, it is not anticipated that any single development project would have a substantial effect on global climate change. GHG emissions from a project would combine with

¹¹ A greenhouse gas "sink" is a process, activity, or mechanism that absorbs more greenhouse gases than it releases.

emissions emitted across California, the United States, and the world to cumulatively contribute to global climate change.

South Coast Air Quality Management District Thresholds

On December 5, 2008, the SCAQMD Governing Board adopted a 10,000 metric tons of carbon dioxide equivalent (MTCO₂e) industrial threshold for projects where the SCAQMD is the lead agency. The SCAQMD formed a GHG CEQA Significance Threshold Working Group (Working Group) to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. This Working Group was formed to assist SCAQMD's efforts to develop a GHG significance threshold and included a wide variety of stakeholders including the State Office of Planning and Research (OPR), CARB, the Attorney General's Office, a variety of city and county planning departments in the Air Basin, various utilities such as sanitation and power companies throughout the Air Basin, industry groups, and environmental and professional organizations. However, the SCAQMD has not announced when a GHG thresholds for land use projects will be presented to the governing board where the SCAQMD is not the lead agency.

The Working Group proposed a tiered approach to evaluating GHG emissions for development projects where SCAQMD is not the lead agency, wherein projects are evaluated sequentially through a series of "tiers" to determine whether the project is likely to result in a potentially significant impact due to GHG emissions. With the tiered approach, a project is compared against the requirements of each tier sequentially and would not result in a significant impact if it complies with any tier. Tier 1 excludes projects that are specifically exempt from SB 97 from resulting in a significant impact. Tier 2 excludes projects that are consistent with a GHG reduction plan that has a certified final CEQA document and complies with AB 32 GHG reduction goals. Tier 3 excludes projects with annual emissions lower than a screening threshold.

As noted above, the SCAQMD has adopted a threshold of 10,000 MTCO₂e per year for industrial projects. A 3,000 MTCO₂e threshold was proposed for non-industrial projects but has not been adopted. During Working Group Meeting #7, it was explained that the 10,000 MTCO₂e threshold was derived using a 90 percent capture rate of a large sampling of industrial facilities. The SCAQMD concluded that projects with emissions less than the screening threshold would not result in a significant cumulative impact. During Meeting #8, the Working Group defined industrial uses as production, manufacturing, and fabrication activities or storage and distribution (e.g., warehouse, transfer facility, etc.). Additionally, the Working Group specified that a warehouse is considered to be an industrial project.¹² Further, the Working Group indicated that the 10,000 MTCO₂e per year threshold applies to both emissions from construction and operational phases plus indirect emissions (electricity, water use, etc.). During the GHG CEQA Significance Threshold Working Group Meeting #15, the SCAQMD noted that it was considering extending the industrial GHG significance threshold for use by all lead agencies.

Tier 4 consists of three decision tree options. Under the Tier 4 first option, SCAQMD initially outlined that a project would be excluded if design features and/or mitigation measures resulted in emissions 30 percent lower than business as usual emissions. However, the Working Group did not provide a recommendation for this approach. The Working Group folded the Tier 4 second option into the third option. Under the Tier 4 third option, a project would be excluded if it was below an efficiency-based threshold of 4.8 MTCO₂e per service population per year. Tier 5 would exclude projects that implement

¹² South Coast Air Quality Management District, *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #8*, 2009.

off-site mitigation (GHG reduction projects) or purchase offsets to reduce GHG emission impacts to less than the proposed screening level.

Tier 3 Screening Thresholds. When the tiered approach is applied to a proposed project, and the project is found not to comply with Tier 1 or Tier 2, the project's emissions are compared against a screening threshold, as described above, for Tier 3. The screening threshold formally adopted by SCAQMD is an "interim" screening threshold for stationary source industrial projects where the SCAQMD is the lead agency under CEQA. The threshold was termed "interim" because, at the time, SCAQMD anticipated that CARB would be adopting a statewide significance threshold that would inform and provide guidance to SCAQMD in its adoption of a final threshold. However, no statewide threshold was ever adopted, and the interim threshold remains in effect.

For projects for which SCAQMD is not a lead agency, no screening thresholds have been formally adopted. However, as noted above, the SCAQMD Working Group has recommended a threshold of 10,000 MTCO₂e/year for industrial projects and 3,000 MTCO₂e/year for residential and commercial projects. SCAQMD determined that these thresholds would "capture" 90 percent of GHG emissions from these sectors, "capture" meaning that 90 percent of total emissions from all new projects would be subject to some type of CEQA analysis (i.e., found potentially significant).¹³

Although the screening threshold for industrial projects is 10,000 MTCO₂e per year, this analysis conservatively uses 3,000 MTCO₂e per year as the project GHG threshold. The numeric bright line and efficiency-based thresholds were developed to be consistent with CEQA requirements for developing significance thresholds, are supported by substantial evidence, and provide guidance to CEQA practitioners and lead agencies with regard to determining whether GHG emissions from a proposed project are significant.

In Center for Biological Diversity v. Department of Fish and Wildlife (2015) 62 Cal. 4th 2014, 213, 221, 227, following its review of various potential GHG thresholds proposed in an academic study, [Crockett, Addressing the Significance of Greenhouse Gas Emissions: California's Search for Regulatory Certainty in an Uncertain World (July 2011), 4 Golden Gate U. Envtl. L. J. 203], the California Supreme Court identified the use of numeric bright-line thresholds as a potential pathway for compliance with CEQA GHG requirements. The study found numeric bright-line thresholds designed to determine when small projects were so small as to not cause a cumulatively considerable impact on global climate change was consistent with CEQA. Specifically, California PRC Section 21003(f) provides it is a policy of the State that "[a]II persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment." The California Supreme Courtreviewed study noted, "[s]ubjecting the smallest projects to the full panoply of CEQA requirements, even though the public benefit would be minimal, would not be consistent with implementing the statute in the most efficient, expeditious manner. Nor would it be consistent with applying lead agencies' scarce resources toward mitigating actual significant climate change impacts." (Crockett, Addressing the Significance of Greenhouse Gas Emissions: California's Search for Regulatory Certainty in an Uncertain World (July 2011), 4 Golden Gate U. Envtl. L. J. 203, 221, 227.)

SCAQMD, "Staff Report: Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans," December 5, 2008, Attachment E: "Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold," October 2008, p. 3-2.

The City of Rialto has not adopted GHG significance thresholds but may set a project-specific threshold based on the context of each particular project, including using the SCAQMD Working Group expert recommendation, for this project because: (1) it is in the same air quality basin that the experts analyzed; (2) it is an industrial project; and, (3) there is a factual basis to support why the experts believe that projects with less than 3,000 MTCO₂e/yr would have less than significant contributions to GHG emissions. For the proposed Project, the SCAQMD's proposed 3,000 MTCO₂e/yr screening threshold is used as the significance threshold in addition to the qualitative thresholds of significance set forth below from Section VIII of CEQA Guidelines Appendix G. The 3,000 MTCO₂e/yr screening threshold represents a 90 percent capture rate (i.e., this threshold captures projects that represent approximately 90 percent of GHG emissions from new sources). The 3,000 MTCO₂e/year value is typically used in defining small projects within this Air Basin that are considered less than significant because it represents less than one percent of the future 2050 statewide GHG emissions target and the lead agency can provide more efficient implementation of CEQA by focusing its scarce resources on the top 90 percent or new developments within the Air Basin emitting GHGs. Projects above the 3,000 MTCO₂e/year level would fall within the 90 percent of largest projects that are worth mitigating without wasting scarce financial, governmental, physical and social resources.¹⁴ As noted in the academic study, Addressing the Significance of Greenhouse Gas Emissions: California's Search for Regulatory Certainty in an Uncertain World (Crockett, 2011), the fact that small projects below a numeric bright line threshold are not subject to CEQA-based mitigation does not mean such small projects do not help the State achieve its climate change goals. Even small projects participate in or comply with non-CEQA-based GHG reduction programs, such constructing development in accordance with statewide GHG-reducing energy efficiency building standards (CalGreen or Title 24 energy-efficiency building standards).¹⁵ Moreover, as workers buy cars and gasoline and as future tenants of the industrial building buy trucks and diesel from manufacturers regulated by the State to reduce GHG emissions, the GHG generated by a project often reduces over time, as demonstrated in the GHG modeling addressed later in this section.¹⁶

The 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) was prepared by the CARB to provide strategies to reduce the State's carbon emissions. The 2022 Scoping Plan sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. The transportation, electricity, and industrial sectors are the largest GHG contributors in the State. The 2022 Scoping Plan plans to achieve the AB 1279 targets primarily through zero-emission transportation (e.g., electrifying cars, buses, trains, and trucks). Additional GHG reductions are achieved through decarbonizing the electricity and industrial sectors.

SCAQMD, Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold, at pp. 3-2 and 3-3, October 2008; Crockett, Addressing the Significance of Greenhouse Gas Emissions: California's Search for Regulatory Certainty in an Uncertain World, July 2011, 4 Golden Gate U. Envtl. L. J. 203, 221, 227, 229-235).

¹⁵ Crockett, Addressing the Significance of Greenhouse Gas Emissions: California's Search for Regulatory Certainty in an Uncertain World, July 2011, 4 Golden Gate U. Envtl. L. J. 203, 221, 227, 229-235).

¹⁶ On pages 3-2 and 3-3 of the SCAQMD's Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold (October 2008), the SCAQMD notes that a GHG significance threshold based on a 90 percent emission capture rate may be more appropriate to address the long-term GHG impacts. Further, a 90 percent emission capture rate sets the emission threshold low enough to capture a substantial fraction of future stationary source projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. This assertion is based on the fact that the SCAQMD estimates that these GHG emissions would account for less than one percent of future 2050 statewide GHG emissions target (85 MMTCO₂e/yr). In addition, these small projects would be subject to future applicable GHG control regulations that would further reduce their overall future contribution to the statewide GHG inventory.

Statewide strategies to reduce GHG emissions in the latest 2022 Scoping Plan include implementing SB 100, which would achieve 100 percent clean electricity by 2045; achieving 100 percent zero emission vehicle sales in 2035 through Advanced Clean Cars II; and implementing the Advanced Clean Fleets regulation to deploy zero-electric vehicle buses and trucks. Additional transportation policies include the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel-Fueled Fleets Regulation, Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Diesel-Fueled Fleets Regulation, Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Diesel-Fueled Fleets Regulation, Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Diesel-Fueled Fleets Regulation, Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, and Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation. The 2022 Scoping Plan would continue to implement SB 375. GHGs would be further reduced through the Cap-and-Trade Program carbon pricing and SB 905. SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate carbon dioxide removal projects and technology.

Project-Specific Analysis and Significance Determination: Less Than Significant Impact

Short-Term Construction Greenhouse Gas Emissions. The Project would result in direct emissions of GHGs from construction activities. The approximate quantity of daily GHG emissions generated by construction equipment for the Project is identified in **Table 3.8-1: Construction-Related Greenhouse Gas Emissions**. As shown, the Project would result in the generation of approximately 490.55 MTCO₂e over the course of construction. Construction GHG emissions are typically summed and amortized over a 30-year period, then added to the operational emissions.¹⁷ The amortized Project construction emissions would be approximately 16.35 MTCO₂e per year. Once construction is complete, the generation of these GHG emissions would cease.

Table 3.8-1: Construction-Related Greenhouse Gas Emissions			
Category	MTCO ₂ e		
2024 Construction	490.55		
30-Year Amortized Construction	16.35		
Source: CalEEMod version 2022.1. Refer to Appendix A for model outputs.			

Long-Term Operational Greenhouse Gas Emissions. Operational or long-term emissions occur over the life of a project. GHG emissions would result from direct emissions such as project-generated vehicular traffic, on-site combustion of natural gas, and operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources such as off-site generation of electrical power, the energy required to convey water to, and wastewater from the Project, the emissions associated with solid waste generated from the Project, and any fugitive refrigerants from air conditioning or refrigerators.

Total GHG emissions associated with the Project are summarized in **Table 3.8-2: Project Greenhouse Gas Emissions**. As shown in the table, the Project would generate approximately 4,123 MTCO₂e annually from both construction and operations which would be a reduction from the 8,489 MTCO₂e based on the maximum development that could occur on the project site as set forth in the Airport Specific Plan. Although project-related net GHG emissions would exceed the 3,000 MTCO₂e per year threshold, the Project would result in a net change of -4,366 MTCO₂e. Consistent with State CEQA Guidelines Section 15162, based upon the analysis of potential environmental consequences anticipated to occur from implementation of the Project, the proposed Project would not result in any new significant impact or a substantial increase in the severity of a known impact.

¹⁷ Amortization period is based on the standard 30-year assumption of the South Coast Air Quality Management District (South Coast Air Quality Management District, *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13*, August 26, 2009).

Table 3.8-2: Project Greenhouse Gas Emissions				
	MTCO₂e per Year			
Emissions Source	Existing Specific Plan Maximum Allowed Development	Proposed Project	Net Change of Emissions	
Construction Amortized Over 30 Years	-	16.35	16.35	
Area Sources	10	5	-5	
Energy	877	457	-420	
Mobile	7,184	3,359	-3,825	
Cargo Handling Equipment	-	89.67	89.67	
Waste	143	67	-76	
Water and Wastewater	275	129	-146	
Total	8,489	4,123	-4,366	
Source: CalEEMod version 2022.1. Refer to Appendix A for model outputs.				

Consistency with the City of Rialto Climate Adaptation Plan. The City of Rialto Climate Adaptation Plan (Rialto CAP)¹⁸ outlines goals to reduce energy consumption and GHG emissions to become a more sustainable community. Goals include:

- Prevent truck routes from disproportionately impacting disadvantaged communities;
- Create a clean air checklist for new development of sensitive land uses;
- Increase use of low-emission and electric vehicles where feasible;
- Adopt building and maintenance standards that reflect the regional best practices in reducing urban heat island effect.

The Rialto CAP focuses on municipal measures that the City would implement to prepare the City and its residents for the expected impacts of climate change. The Rialto CAP evaluates Rialto's vulnerabilities and capabilities and propose policy around four climate-related hazards: air pollution, extreme heat, wildfire, and flooding. The Rialto CAP does not include project-specific GHG thresholds or policies for individual development projects. The CAP builds on the City's existing General Plan Safety Element and Local Hazard Mitigation Plan. The proposed Project would be consistent with the Rialto CAP through compliance with applicable energy efficiency standards and the preparation of an Air Quality Assessment, the latter which has been prepared as a part of this Addendum and finds that impacts to sensitive receptors would be less than significant.

The proposed Project would be required to comply with all building codes in effect at the time of construction which include energy conservation measures mandated by Title 24 of the California Building Standards Code – Energy Efficiency Standards and the California Green Building Standards. Because Title 24 standards require energy conservation features in new construction (e.g., high-efficiency lighting, high-efficiency heating, ventilating, and air-conditioning (HVAC) systems, thermal insulation, double-glazed windows, water-conserving plumbing fixtures), these standards indirectly regulate and reduce GHG emissions. California's Building Energy Efficiency Standards are updated on an approximately three-year

¹⁸ Rialto Climate Adaption Plan. https://www.yourrialto.com/DocumentCenter/View/1761/Rialto-Climate-Adaptation-Draft-Plan-July-2021.

cycle. The most recent 2022 standards went into effect January 1, 2023. As discussed in Section 3.6, *Energy*, the Project's energy impacts would be less than significant.

Further, the Project would comply with the City's General Plan policies and State Building Code provisions designed to reduce GHG emissions. The proposed Project would also comply with all SCAQMD applicable rules and regulations during construction and the operational phase and would not interfere with the State's goals of reducing GHG emission to 1990 levels by 2020 as stated AB 32, 40 percent below 1990 levels by 2030 as stated by SB 32, and maintaining net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels as stated by AB 1279.

The GHG emissions associated with the proposed Project would be minimal when compared to those associated with the land uses in the Airport Specific Plan area and would be reduced through compliance with statewide measures, such as State Building Code provisions, Title 24 Energy Efficiency Standards, and California Green Building Standards. In addition, the Project would be consistent with Title 24, AB 32, SB 32, and the Rialto CAP. Therefore, the proposed Project would have a less than significant impact with regard to GHG emissions, and would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions. Impacts related to GHG emissions would be less than significant. Accordingly, there are no changes or new significant information that would require preparation of subsequent CEQA documentation.

Cumulative Impacts

Due to the global nature of climate change, most projects will not result in GHG emissions that are individually significant. Therefore, it is accepted as very unlikely that any individual development project would have GHG emissions of a magnitude to directly impact global climate change. GHG emissions from the proposed Project would combine with emissions emitted across California, the United States, and the world to cumulatively contribute to global climate change. The Project's cumulative contribution of GHG emissions would be less than significant and the Project's cumulative GHG impacts would also be less than cumulatively considerable and potential impacts are considered less than significant.

Mitigation Program

No mitigation measures are required.

Conclusion

As discussed above, impacts related to GHG emissions were not analyzed in the Airport Specific Plan EIR. The Airport Specific Plan assumed a maximum FAR of 0.7:1 for planned industrial development. The total area of the proposed project site is 488,624 sf, resulting in a maximum allowable building size of 342,037 sf. As such, the proposed development would generate fewer mobile source GHG emissions (due to the generation of fewer trips) and generate less energy emissions than assumed for the project site in the Airport Specific Plan EIR. Accordingly, impacts related to GHG emissions associated with the proposed Project would be less than when compared to the allowable uses for the project site assumed in the Airport Specific Plan EIR. With regard to PRC Section 21166 and State CEQA Guidelines Section 15162(a), the Project would not result in any new significant impacts. Additionally, no new information of substantial importance is known that would result in significant effects not addressed in the Airport Specific Plan EIR. The proposed Project would have a less than significant impact on GHG emissions. Therefore, preparation of a subsequent environmental analysis is not warranted.

3.9 Hazards and Hazardous Materials

- Threshold (a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- Threshold (b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?
- Threshold (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?
- Threshold (d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and as a result, would create a significant hazard to the public or the environment?
- Threshold (e) Would the project be 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, result in a safety hazard for people residing or working in the project area?
- Threshold (f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- Threshold (g) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas?

Summary of Impacts Identified in the Airport Specific Plan EIR

The Airport Specific Plan EIR found that the historical presence of hazardous material contamination in the Airport Specific Plan area ranges from moderate to high, depending on the location within the Airport Specific Plan (i.e., Mid-Valley Sanitary Landfill, fireworks manufacturers, Rialto Municipal Airport, and industrial uses). These uses, in addition to illegal dumping in the southwest portion of the Airport Specific Plan area, have the ability to create an adverse environmental condition. The Airport Specific Plan EIR also determined that existing and future industries and businesses would continue to use, produce, and transport hazardous substances and waste. The Airport Specific Plan area is no longer proximate to any airports or within an airport land use plan. Airport Specific Plan EIR Mitigation Measures 5.13-1 and 5.13-2 require site-specific developments within or adjacent to the industrial area along Locust Avenue and the Mid-Valley Sanitary Landfill to prepare parcel-specific assessments and provide protocols in the event that unknown waste is discovered during construction. Mitigation Measures 5.13-3A, 5.13-3B, and 5.13-3C provide requirements related to renovation or demolition of any on-site structures. Implementation of these mitigation measures reduces potential impacts to hazards and hazardous to less than significant levels.

Project-Specific Analysis and Significance Determination: No new impact; no substantial change from previous analysis.

Development of the project site with light industrial uses was contemplated in the Airport Specific Plan EIR. Therefore, impacts associated with the Project would be similar to or less than those evaluated in the Airport Specific Plan EIR.

Exposure of the public or the environment to hazardous materials can occur through transportation accidents; environmentally unsound disposal methods, improper handling of hazardous materials or hazardous wastes, and/or emergencies such as explosions or fires. The severity of these potential effects varies by type of activity, concentration and/or type of hazardous materials or wastes, and proximity to sensitive receptors.

Similar to all development pursuant to the Airport Specific Plan, the Project would be required to comply with regulations and standards established by applicable regulatory agencies, including the Department of Toxic Substances Control (DTSC), the U.S. EPA, and the Occupational Safety and Health Administration (OSHA). Compliance with applicable laws and regulations governing the use, storage, transportation, and disposal of hazardous material would ensure that the Project would not create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials.

Construction of the Project would involve the transport, use and disposal of hazardous materials on and off the project site. Such materials would include fuels, paints, mechanical fluids, and solvents but would not be present in such a quantity or used in such a manner that would pose a significant hazard to the public. The routine transport, use, and disposal of these materials must adhere to federal, State, and local regulations for transport, handling, storage, and disposal of hazardous substances. Compliance with the regulatory framework would ensure that Project construction would not create a significant hazard to the public or environment.

The Project would include the construction of one warehouse and distribution building, including an office component, and associated on-site and off-site improvements and is not anticipated to result in the release of hazardous materials into the environment. The proposed warehouse and distribution building would be expected to use limited hazardous materials and substances which include cleaners, paints, solvents, and fertilizers and pesticides for the proposed landscaping. Project implementation would not create a significant impact through the transport, use, or disposal of hazardous materials as the proposed development would be required to comply with all applicable federal, State, and local regulations which are intended to avoid impacts to the public and environment. These regulations ensure that hazardous materials/waste users, generators and transporters provide operational safety and measures to reduce potential threats to public health and safety.

A Phase I Environmental Site Assessment (ESA) was prepared by Waterstone Environmental, Inc. (**Appendix G**) for the project site. A recognized environmental condition (REC) is defined in the ASTM Standard as the presence or likely presence of a hazardous substances or petroleum products in, on, or at a property: 1) due to release to the environment; 2) under conditions indicative of a release to the environment; or 3) under conditions that pose a material threat of a future release to the environment. No RECs were identified for the project site. The project site is not identified on the Cortese List, which is the list of hazardous materials sites that is compiled pursuant to Section 65962.5 of the California Government Code (https://dtsc.ca.gov/dtscs-cortese-list; accessed November 15, 2023). In addition to the Cortese List, federal, State, and local governmental agencies maintain other lists of sites where hazardous materials may be present or used. The Phase I ESA did not identify the project site is not listed on the Geotracker database (http://geotracker.waterboards.ca.gov; accessed November 15, 2023) or the Envirostor website (http://www.envirostor.dtsc.ca.gov/public; accessed November 15, 2023). The project site does not appear on any databases that record leaks, spills, or other hazardous waste violations.
Per Envirostor and Geotracker, there are between 32 to 40 off-site fireworks and pyrotechnic companies that are believed to have contributed to area-wide perchlorate contamination of the groundwater. As a result, the City's potable water source has been compromised and restricted for use due to contamination in certain groundwater wells.¹⁹ Both the Envirostor website and Geotracker database identified open cases west of the project site, referred to as the "Rockets, Fireworks, and Flares" (RFF) site (formerly known as the B.F. Goodrich site) at 3196 N. Locust Avenue. The RFF site is a 160-acre area that also includes a six-mile-long area of groundwater contamination downgradient of the 160-acre area in Rialto where volatile organic compounds (VOCs) and perchlorate have contaminated soil and groundwater. The 160-acre area is bordered by West Casa Grande Drive on the north, Locust Avenue on the east, Alder Avenue on the west, and an extension of Summit Avenue on the south. A map made available by the City of Rialto and the Regional Water Quality Control Board (**Appendix G**) indicates that the perchlorate plume extends adjacent to or potentially beneath the southwest portion of the project site. Site investigations and cleanup are ongoing.

The 160-acre area was part of a larger area acquired by the United States Army in 1942 to develop an inspection, consolidation, and storage facility for rail cars transporting ordnance to the Port of Los Angeles. Since the federal government sold the property in 1946, a portion of the property has been used by defense contractors, fireworks manufacturers, and other businesses that used perchlorate salts and/or solvents in their manufacturing processes or products. In 1956 and 1957, West Coast Loading Corporation manufactured and tested two products, photoflash flares and "ground-burst simulators," containing potassium perchlorate. From about 1957 to 1962, B.F. Goodrich Corporation conducted research, development, testing, and production of solid-fuel rocket propellant containing ammonium perchlorate and used solvents in the manufacturing process. Since the 1960s, the 160-acre area has been used by a number of companies that manufactured or sold pyrotechnics, including Pyrotronics, Pyro Spectaculars, and American Promotional Events.

In 2002, the SWRCB began actively working with Potentially Responsible Parties and property owners to investigate soil and groundwater contamination at the B.F. Goodrich site and in surrounding areas. The U.S. EPA began assisting the SWRCB in 2002, providing technical, enforcement, and financial assistance. In 2008, after the SWRCB's efforts were stalled by legal challenges, the U.S. EPA increased its efforts at the site. In September 2009, the U.S. EPA added the B.F. Goodrich site to the Superfund National Priorities List.

Between 2003 and 2013, numerous investigations have been conducted to determine the extent of soil and groundwater contamination. The studies have included the collection and analysis of soil samples, the collection and analysis of soil gas samples, the installation of groundwater monitoring wells, and/or the collection and analysis of groundwater samples. The studies were overseen by the SWRCB, the U.S. EPA, and the DTSC.

Investigations carried out by U.S. EPA between 2008 and 2012 included a groundwater pump-and-treat system intended to intercept and remove contaminated groundwater spreading from the 160-acre source area. The 160-acre source area is where most or all of the contaminants entered the groundwater and testing has identified the highest levels of groundwater contamination. A second groundwater remedy was constructed between 2015 and 2021 to remove perchlorate from extracted groundwater; pipelines

¹⁹ City of Rialto. (2010). *City of Rialto General Plan*. https://www.yourrialto.com/DocumentCenter/View/1494/2010-General-Plan. Accessed March 2023.

and pumps to convey the treated water from the treatment plant to the City of Rialto's water distribution system for use as drinking water supply; and a groundwater monitoring program. In January 2022, the U.S. EPA proposed a second groundwater cleanup remedy to address contaminated groundwater in the "mid-basin" area which has moved past downgradient of 160-acre area. Eleven multi-level groundwater monitoring wells were installed; testing is ongoing.

The Phase I ESA prepared for the project site indicates that groundwater is typically encountered at depths of approximately 420 feet below surface grade (bsg) in the site vicinity. Perched groundwater is occasionally encountered at depths of approximately 100 feet bsg; therefore, it is not considered a threat to surface development. Given that the plume is known, responsible parties identified, and the unlikely to impact surface development, the perchlorate plume is not considered an environmental concern for the proposed Project.

The northern part of the project site is vacant and the southern portion of the project site is paved and fenced off for construction equipment storage. According to historic aerial review, prior residential structures appeared on site in the late 1950s and were demolished in 2023. No RECs were identified for the project site and no further assessment regarding hazardous materials is required.

The Airport Specific Plan EIR required the preparation of a parcel-specific ESA prior to development activities. The documentation provided in this Addendum satisfies this measure. Any removal, transportation, and disposal of impacted soil or groundwater would be performed in accordance with applicable federal, State, and local laws, regulations, and ordinances. Adherence with regulatory requirements and mitigation would reduce potential impacts to a less than significant level.

There are no existing or planned schools within 0.25 mile of the project site. Accordingly, no new impacts relative to proximity to schools or a substantial increase in the severity of a previously identified significant impact evaluated in the Airport Specific Plan EIR would occur.

The former Rialto Municipal Airport, which was located approximately 1.7 miles south of the project site, closed in September 2014 and has since been demolished. The closest airport is the San Bernardino International Airport, located approximately 9.5 miles southeast of the project site. Accordingly, the project site is not located within the vicinity of a public use airport and would not create a safety hazard or excessive noise for people at the project site.

Project implementation would not impair or physically interfere with an adopted emergency response or evacuation plan. Project construction would require the temporary closure of West Coast Boulevard. Access to the residential area north and east of the project site would be maintained during construction for residents and emergency access only. Upon completion of construction, the impacted portion of West Coast Boulevard would resume similar to existing conditions. Adherence to all applicable regulations and General Plan policies would result in a less than significant impact with respect to interference with an adopted emergency response plan or emergency evacuation plan. Wildland fires are discussed in Section 3.19, *Wildfire*.

Similar to the Airport Specific Plan EIR, hazards and hazardous materials related impacts would be less than significant and there are no changes or new information requiring preparation of subsequent CEQA documentation. No new impact would result, nor would the impact previously identified be any more severe as a result of the proposed Project. Therefore, the Project would be consistent with the effects of implementation of the Airport Specific Plan.

Cumulative Impacts

Impacts associated with hazardous materials are often site-specific and localized. The RFF site is a 160acre area that also includes a six-mile-long area of groundwater contamination downgradient of the 160acre area in Rialto where VOCs and perchlorate have contaminated soil and groundwater. The perchlorate plume extends adjacent to or potentially beneath the southwest portion of the project site. Site investigations and cleanup are ongoing. The Phase I ESA prepared for the project site indicates that groundwater is typically encountered at depths of approximately 420 feet bsg in the site vicinity. Given that the plume is known, responsible parties identified, and is not likely to impact surface development, the perchlorate plume is not considered an environmental concern for the proposed Project. Therefore, the proposed Project would not cumulatively contribute known groundwater contamination. Accordingly, the proposed Project would not result in incremental effects to hazards or hazardous materials that could be compounded or increased when considered together with similar effects from cumulative projects.

Mitigation Program

Mitigation Measures 5.13-1 and 5.13-2 from the Airport Specific Plan EIR are applicable to the Project. Mitigation Measures 5.13-3a through 5.13-3c are not applicable, as the Project would not include the demolition of existing structures.

- **MM 5.13-1** Site-specific developments within or adjacent to the Industrial area along Locust Avenue and the Mid-Valley Sanitary Landfill shall prepare parcel-specific assessments, prior to development activities.
- **MM 5.13-2** The following is a cautionary measure to be implemented during grading activities. If unknown waste is discovered during construction by the contractor which he/she believes may involve hazardous waste materials, the contractor shall:
 - Immediately stop work in the vicinity of the suspected contaminant, removing workers and the public from the area;
 - Notify the Project Engineer of the implementing Agency;
 - Secured the area as directed by the Project Engineer; and
 - Notify the implementing agency's Hazardous Waste/Materials Coordinator.

Conclusion

Based on the analysis set forth in this Addendum, the Project would not cause a new hazardous materials impact to occur, nor an increase in the severity of a hazardous material impact previously disclosed in the Airport Specific Plan EIR. Therefore, the Project would not cause either a new cumulative impact to occur, nor an increase in the severity of a cumulative impact previously disclosed. There are no substantial changes to the circumstances under which the Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the Airport Specific Plan EIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the Airport Specific Plan EIR was certified is available that would impact the prior finding less than significant impact with mitigation. Therefore, preparation of a subsequent environmental analysis is not warranted.

3.10 Hydrology and Water Quality

- Threshold (a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?
- Threshold (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?
- Threshold (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 a 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 off-site.
 - 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.
 - iv) Impede or redirect flood flows.
- Threshold (d) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?
- Threshold (e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Summary of Impacts Identified in the Airport Specific Plan EIR

Water quality and hydrology are discussed in Section 5.5, Water Resources, of the Airport Specific Plan EIR. The Airport Specific Plan EIR found that implementation of the Airport Specific Plan would result in decreased infiltration to groundwater reserves, thereby creating increased surface runoff generated in the Airport Specific Plan area. However, implementation of the proposed storm drainage system identified in the Airport Specific Plan would reduce these impacts to less than significant levels. The Airport Specific Plan EIR also determined that construction runoff from disturbed areas within the Airport Specific Plan area may contain silt and debris, resulting in short-term increases in the sediment load in the storm drain system serving the Airport Specific Plan area. The Airport Specific Plan EIR also identified that general grading activities, including those related to demolition and construction (then regulated by Chapters 29 and 70 of the Uniform Building Code), require erosion control. Further, development in the Airport Specific Plan area would be required to comply with NPDES permit regulations for erosion, siltation and contaminated runoff control. The Airport Specific Plan EIR determined that water quality may be impacted within the groundwater storage area due to the addition of chemicals, such as oils, grease, detergents, and fertilizers from urbanization. The Airport Specific Plan EIR also found that erosion and sedimentation during grading and construction of individual projects would occur only if adequate erosion control measures were not applied during and after the earthwork stage when disturbed soil is left temporarily unprotected.

Mitigation Measures 5.5-1A, 5.5-1B, 5.5-2, and 5.5-3 require individual developments to pay a pro-rata share of the storm drain improvements; use stepping stones/bricks set in pervious materials for walkways, divert water to landscaped areas, and provide pervious paving wherever possible; comply with NPDES

rules and regulations; and adherence of the adopted master plans of the Rialto Public Works Department (Water Division), Fontana Water Company, and the West San Bernardino County Water District, as well as the guidelines and plans for the San Bernardino Flood Control District (SBCFCD). Implementation of these mitigation measures was found to mitigate the degradation of storm water and urban runoff associated with increased development to a less than significant level.

With respect to flood hazards, tsunamis, and seiches, the Initial Study for the Airport Specific Plan EIR noted that there are no large water bodies in the area. Therefore, people and property would not be exposed to water-related hazards such as seiches or tsunamis. The Airport Specific Plan EIR found that the Specific Plan area was not within a 100-year flood zone.

Project-Specific Analysis and Significance Determination: No new impact; no substantial change from previous analysis.

The Airport Specific Plan EIR assumed that the project site would be developed and potential impacts associated with drainage and water quality would be addressed. The land use designation for the project site in the Airport Specific Plan is Planned Industrial Development (I-PID). Therefore, the Airport Specific Plan EIR evaluated potential drainage and water quality impacts assuming that the project site would be developed with uses permitted under the I-PID land use designation, which includes light industrial uses such as warehouse and distribution uses as proposed by the Project. It is also noted that the project site has been previously disturbed and is partially graded. Runoff from the site is conveyed to the existing 102-inch storm drain located within Locust Avenue.

Preliminary Hydrology and Water Quality Management Plan reports were prepared for the Project and are provided as **Appendix H** and **Appendix I**, respectively. The Project would meet storm water treatment requirements in the San Bernadino MS4 Permit. Stormwater generated by the proposed development would be captured and conveyed to the proposed on-site underground retention chambers. To minimize water quality impacts during construction of the Project, construction activities would be required to comply with a Stormwater Pollution Prevention Plan (SWPPP) consistent with the General Permit). The SWPPP would incorporate BMPs such as gravel bags, silt fence, and fiber rolls. The Project would result in an increase in impervious surfaces on-site. Similar to the development assumed under the Airport Specific Plan, the Project is consistent with the Airport Specific Plan and zoning designations and therefore the development envisioned for the project site would have been accounted for in the water supply estimates included in the General Plan. Further, there are no public water wells located on the project site and groundwater is not drawn from the area.

As discussed in the Preliminary Hydrology Report, the Project would not substantially alter the existing drainage patterns of the project site. The proposed condition would mimic the existing drainage pattern and excess flows from the proposed drainage system would continue to discharge to the existing 102-inch RCP located within Locust Avenue. The project site does not contain any streams or rivers; therefore, none would be altered by the Project. Additionally, the project site is located approximately 48 miles inland and east of the Pacific Ocean. There is no risk of exposure to inundation by seiche of tsunami. Accordingly, there is no significant risk of release pollutants due to site inundation.

The Project does not propose the use of groundwater and the majority of the drainage would use underground infiltration retention systems, which would retain water prior to discharging into the public

storm drain system. Accordingly, the Project would not obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts to hydrology and water quality would be less than significant and there are no changes or new information on requiring preparation of subsequent environmental documentation.

Cumulative Impacts

As discussed above, the Project would not cause a new drainage or water quality impact to occur, nor an increase in the severity of a drainage or water quality impact previously disclosed in the Airport Specific Plan EIR. As such, the Project would not cumulatively contribute to a cumulatively significant impact related to water quality and drainage.

Mitigation Program

Mitigation Measures 5.5-1A, 5.5-1B, 5.5-2, and 5.5-3 from the Airport Specific Plan EIR are applicable to the Project.

- **MM 5.5-1A** Individual developments shall be required to pay a pro-rata share of the storm drain improvements identified on Exhibit 22 and on Table 5-17.
- **MM 5.5-1B** Individual development projects shall be required to reduce runoff by using stepping stones/bricks set in pervious materials for walkways, divert water to landscaped areas, and provide pervious paving wherever possible. Reduce landscape irrigation waste and runoff by water conserving irrigation systems, moisture sensing devices and avoidance of rounded landscaped areas.

The need to implement these types of runoff control measures shall be determined during individual project design review.

- **MM 5.5-2** For individual development projects, require compliance with NPDES rules and regulations, as well as applicable permits.
- MM 5.5-3 The adopted master plans of the Rialto Public Works Department (Water Division), Fontana Water Company, and the West San Bernardino County Water District, as well as the guidelines and plans for the SBCFCD shall be adhered to in order to ensure continued water availability to the inhabitants of the City.

Conclusion

Based on the comparative analysis provided in this Addendum, no new impacts relative to hydrology and water quality or an increase in the severity of a previously identified significant impact evaluated in the Airport Specific Plan EIR would occur. With regard to PRC Section 21166 and State CEQA Guidelines Section 15162(a), the Project would not result in any new impacts, or increase the severity of the previously identified impacts. There are no substantial changes to the circumstances under which the Project would be undertaken that would result in a new or more severe environmental impacts that previously addressed in the Airport Specific Plan EIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the Airport Specific Plan EIR was certified is available that would impact the prior finding less than significant impact. Therefore, preparation of a subsequent environmental analysis is not warranted.

3.11 Land Use and Planning

- Threshold (a) Would the project physically divide an established community?
- Threshold (b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Summary of Impacts Identified in the Airport Specific Plan EIR

The Rialto Municipal Airport ceased operations in 2014 and the former airport property and much of the properties proximate to the Rialto Municipal Airport that were sited to accommodate development were removed from the Airport Specific Plan and incorporated into the Renaissance Specific Plan, which was adopted by the City in 2010. Although the Rialto Municipal Airport no longer exists, the City's Airport Specific Plan serves as the zoning ordinance for parcels in the Airport Specific Plan area that were not removed from the Airport Specific Plan, primarily located northwest, west, and east of the former airport.

The Airport Specific Plan EIR identified the potential for land use conflicts between the proposed industrial, office, and retail uses adjacent to residential uses and airport uses. Several measures were identified to restrict activities in industrial and airport-related uses from sensitive uses through the use of buffers to screen different land uses and restrictions within Runway Protection Zones or Airport Safety Zones to reduce land use conflicts. Potential impacts related to inconsistencies with existing land use regulations were reduced to a less than significant level with the adoption of a General Plan Amendment and a Zone Change as part of the actions proposed with the Airport Specific Plan.

Project-Specific Analysis and Significance Determination: No new impact; no substantial change from previous analysis.

The land use designation for the project site in the Airport Specific Plan is Planned Industrial Development (I-PID). The northern portion of the 11.21-acre site is vacant and the southern portion of the site is partially paved and used for construction equipment storage. The Project would not include any roadway extensions or other development features through currently developed areas. Therefore, the Project, consistent with the assumptions in the Airport Specific Plan, would not physically divide an established community and there would be no impacts. Therefore, there are no changes or new significant information that would require preparation of subsequent CEQA documentation.

The City's General Plan Land Use Plan Map depicts the City's land use designations and indicates that the project site has a Light Industrial land use designation with a Specific Plan Overlay. The Light Industrial land use designation allows for a mix of commercial, office, research and development, laboratories, and light industrial uses. The City's Zoning Map identifies the project site as being located within and subject to the Airport Specific Plan. The Airport Specific Plan was adopted in 1997; however, many portions of the Airport Specific Plan area were replaced by the adoption of the Renaissance Specific Plan. The project site remains within the Airport Specific Plan, which identifies the project site as Planned Industrial Development (I-PID). The Project's proposed industrial warehouse and distribution use would comply with the allowable uses identified in the Airport Specific Plan. A Conditional Development (CDP No. 2023-0011) is required to allow the development of a warehouse, which is a conditionally permitted use in industrial zones within the City. Additionally, as required by Chapter 18.65 of the City's Municipal Code, the proposed Project has prepared a Precise Plan of Design (PPD No. 2023-0018); and in accordance with

Chapter 17.16 of the City's Municipal Code, a Tentative Map (TPM No. 20853) has also been prepared to consolidate the existing parcels into one parcel and show the required City right-of-way dedication for West Coast Boulevard including vacations and easements. Mitigation Measures 5.1A and 5.1B from the Airport Specific Plan EIR are not applicable to the proposed Project because the Rialto Municipal Airport is no longer operational. Mitigation Measure 5.1-2 is not applicable because the Project is not related to a landfill expansion. Mitigation Measures 5.1-5 and 5.1-6 have already been implemented by the City of Rialto. Mitigation Measure 5.1-4 from the Airport Specific Plan EIR identifies that uses along the perimeter of the project area boundaries adhere to the design guidelines contained in the Airport Specific Plan which relate to orientation and buffering of non-residential uses when adjacent to residential uses. Accordingly, and consistent with Section 6.2.5 of the Specific Plan, the Project would provide landscape buffers, walls, and additional setbacks as buffers between the proposed warehouse and distribution building and existing residential uses to the east.

The Project is consistent with the pertinent land use planning and policy documents, including the General Plan, the City's Zoning Ordinance, and the Airport Specific Plan. Therefore, the Project, similar to development pursuant to the General Plan, would not physically divide an established community and there would be no impacts. Therefore, there are no changes or new significant information that would require preparation of subsequent CEQA documentation.

Cumulative Impact

The Project is consistent with applicable land use goals and policies. Although other changes in land use plans and regulations may have occurred with past and present projects in the area and may be necessary for individual future projects, such changes have been, and would be, required to demonstrate consistency with General Plan and other City policies such that no significant adverse cumulative impact has occurred or would occur from such changes. Given that the Project is consistent with the land use policies of the applicable plans, the Project would not cumulatively contribute to cause an adverse land use impact based on a conflict with a plan or policy. Any associated physical impacts are covered in the individual topic sections. It is also anticipated that regional growth would be subject to review for consistency with adopted land use plans and policies by the County of San Bernardino, City of Rialto, and other cities in San Bernardino County, in accordance with the requirements of CEQA, the State Zoning and Planning Law, and the State Subdivision Map Act, all of which require findings of plan and policy consistency prior to approval of entitlements for development. Therefore, the Project would not cumulatively contribute to any cumulative land use impacts.

Mitigation Program

Mitigation Measure 5.1-4 from the Airport Specific Plan EIR is applicable to the Project. The Rialto Airport ceased operations in 2014 and the Project is not located within the vicinity of an operating airport. Thus, Mitigation Measures 5.1-1a through 5.1-2 are not applicable to the Project.

MM 5.1-4 The City shall require developments along the perimeter of the project area boundaries to adhere to the design guidelines contained in the Specific Plan which relate to orientation and buffering of non-residential uses when adjacent to residential uses. Further, the City shall require implementation of the streetscape programs and landscape buffer treatments when adjacent to residential uses.

Conclusion

Based on the comparative analysis provided in this Addendum, no new impacts relative to land use or a substantial increase in the severity of a previously identified significant impact evaluated in the Airport Specific Plan EIR would occur. With regard to PRC Section 21166 and State CEQA Guidelines Section 15162(a), the Project would not result in any new impacts, or increase the severity of the previously identified impacts. There are no substantial changes to the circumstances under which the proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the Airport Specific Plan EIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the Airport Specific Plan EIR was certified is available that would impact the prior finding of less than significant with mitigation incorporated. Therefore, preparation of a subsequent environmental analysis is not warranted.

3.12 Mineral Resources

- Threshold (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?
- Threshold (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?

Summary of Impacts Identified in the Airport Specific Plan EIR

The Airport Specific Plan EIR addressed mineral resources impacts in Section 5.4, Natural Resources. The Airport Specific Plan area includes three mineral resource sectors; however, no mining activities were operational within these sectors at the time of the Airport Specific Plan analysis. The Airport Specific Plan EIR assumed that the site would be developed and did not identify the presence of or the potential for use of the site for mineral resource excavation. Accordingly, the Airport Specific Plan EIR determined that implementation of the Airport Specific Plan would result in a less than significant impact resulting from a loss of opportunity to extract aggregate resources in the Airport Specific Plan area. Aggregate extraction within the mineral resource sectors was considered not feasible due to the small size of one of the sectors, existing uses and multiple ownership patterns, and uses planned by other agencies including a Fontana Water Company reservoir and a County Flood Control District facility. The Airport Specific Plan EIR also included mitigation measures to reduce potential impacts from mining operations.

Project-Specific Analysis and Significance Determination: No new impact; no substantial change from previous analysis.

The land use designation for the project site in the Airport Specific Plan is Planned Industrial Development (I-PID). Therefore, the Airport Specific Plan EIR assumed that the site would be developed and did not identify the presence of or the potential for use of the site for mineral resource excavation.

The State of California Department of Conservation, Geologic Energy Management Division (CalGEM) oversees the drilling, operation, maintenance, and plugging and abandonment of oil, natural gas, and geothermal energy wells. CalGEM maintains a mapping system that shows the location of all oil and gas wells in California. According to the mapping system, the closest active well used for oil and gas production is approximately 5.9 miles northeast of the project site. No wells are mapped on the project site and there is no known history of oil or gas wells having been drilled at the site.²⁰

The project site does not have a history of known mining or quarry operations. The Surface Mining and Reclamation Act of 1975 (SMARA) requires the State Geologist to classify land in California according to its potential to contain mineral resources. Exhibit 2.7 of the City of Rialto General Plan identifies mineral resource zones (MRZ) for the City based on the SMARA. According to the General Plan, the project site is located within the MRZ-2 zone, indicating that significant Portland Cement Concrete-Grade (PCC) aggregate resources are present.²¹

Although the project site has been mapped within the MRZ-2 zone, the site does not have a history of aggregate resource mining. Further, the site has a Light Industrial land use designation and is zoned for

²⁰ Department of Conservation (2023b). Well Finder. https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.36675/34.07440/14. Accessed March 2023.

²¹ City of Rialto. (2010). *City of Rialto General Plan*. https://www.yourrialto.com/DocumentCenter/View/1494/2010-General-Plan. Accessed March 2023.

Planned Industrial Development. Therefore, the use of the project site for mining would be inconsistent with pertinent planning and policy documents. Due to the proximity of adjacent land uses including residences, the project site would not be conducive for mining purposes. Additionally, no new information of substantial importance that was not known and could not have been known at the time the Airport Specific Plan EIR was certified is available that would impact the prior finding of less than significant impact with mitigation incorporated. The mitigation measures set forth in the Airport Specific Plan EIR apply to mining extraction activities. Because no mining is proposed, the mitigation measures are not applicable to this Project. Therefore, a less than significant impact would occur regarding the loss of availability of a known mineral resource, and no mitigation is required.

The Project would develop an industrial warehouse and distribution adjacent to existing development. The Project would not remove any locally or regionally important mineral resources from production or preclude access to important mineral resources. No impact to locally-important mineral resource recovery sites would occur. Therefore, there are no changes or new significant information that would require subsequent environmental documentation.

Cumulative Impact

As discussed above, the Project would not cause a new mineral impact to occur, nor an increase in the severity of a mineral impact previously disclosed in the Airport Specific Plan EIR. Therefore, the Project would not cumulatively contribute to impacts to mineral resources.

Mitigation Program

Mitigation Measures 5.4-2A, 5.4-2B, 5.4-2C, 5.4-2D, 5.4-2E, 5.4-2F, 5.4-2G, 5.4-2H, and 5.4-2I from the Airport Specific Plan EIR are not applicable because the Project does not include mineral extraction, mining operations, or the implementation of a Reclamation Plan.

Conclusion

Based on the comparative analysis set forth in this Addendum, no new impacts relative to mineral resources or a substantial increase in the severity of a previously identified significant impact evaluated in the Airport Specific Plan EIR would occur. With regard to PRC Section 21166 and State CEQA Guidelines Section 15162(a), the Project would not result in any new impacts, or increase the severity of the previously identified impacts. There are no substantial changes to the circumstances under which the proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the Airport Specific Plan EIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the Airport Specific Plan EIR was certified is available that would impact the prior finding of less than significant. Therefore, preparation of a subsequent environmental analysis is not warranted.

3.13 Noise

- Threshold (a) Would the project generate 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?
- Threshold (b) Would the project generate excessive groundborne vibration or groundborne noise levels?
- Threshold (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?

Summary of Impacts Identified in the Airport Specific Plan EIR

The Airport Specific Plan EIR concluded that implementation of the Airport Specific Plan would create noise that would impact new and existing receptors. With respect to temporary construction noise, the Airport Specific Plan EIR determined that noise from construction activities would potentially result in excessive noise levels that impact noise sensitive receptors. However, these impacts are anticipated to be short-term, ceasing upon project completion. Further, construction-related noise impacts would be substantially mitigated and minimized by staging construction equipment away from existing and future sensitive receptors and with implementation of Airport Specific Plan EIR mitigation measures.

Airport Specific Plan implementation would also create several new stationary noise sources, such as mechanical equipment, loading areas, parking areas, and loudspeakers on the project site. However, the Airport Specific Plan EIR concluded that with implementation of mitigation measures and adherence to City noise standards, noise impacts would be reduced to less than significant levels. Further, the Airport Specific Plan EIR analyzed existing off-site sensitive receptors located along key roadways within the Airport Specific Plan area and concluded that noise impacts to off-site sensitive receptors resulting from project related traffic would be less than significant.

Project-Specific Analysis and Significance Determination: No new impact; no substantial change from previous analysis.

Construction

Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., land clearing, grading, excavation, paving, etc.). Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels. During construction, exterior noise levels could affect nearby sensitive receptors. The nearest sensitive receptors are single-family residences approximately 15 feet to the east of the project site boundary. However, construction activities would occur throughout the project site and would not be concentrated at a single point near sensitive receptors.

Construction activities would include demolition, site preparation, grading, building construction, paving, and architectural coating. Such activities would require concrete/industrial saws, excavators, and dozers during demolition; dozers and tractors during site preparation; tractors, excavators, graders, and dozers during grading; cranes, forklifts, generators, tractors, and welders during building construction; pavers, rollers, mixers, and paving equipment during paving; and air compressors during architectural coating. Typical operating cycles for these types of construction equipment may involve one or two minutes of full

power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels. Typical noise levels associated with individual construction equipment are identified in **Table 3.13-1: Typical Construction Noise Levels**.

Equipment	Typical Noise Level (dBA Lmax) at 50 feet from Sou
Air Compressor	80
Backhoe	80
Compactor	82
Concrete Mixer	85
Concrete Pump	82
Concrete Vibrator	76
Crane, Mobile	83
Dozer	85
Generator	82
Grader	85
Impact Wrench	85
Jack Hammer	88
Loader	80
Paver	85
Pneumatic Tool	85
Pump	77
Roller	85
Saw	76
Scraper	85
Shovel	82
Truck	84

As shown in the table, exterior noise levels could affect the nearest existing sensitive receptors in the vicinity. Sensitive uses in the project site vicinity include residential uses 15 feet to the east. These sensitive receptors may be exposed to elevated noise levels during construction. However, construction noise would be acoustically dispersed throughout the project site and not concentrated in one area near sensitive uses. The City's Municipal Code does not establish quantitative construction noise standards. Instead, the Municipal Code establishes limited hours of construction activities. As a result, this analysis conservatively uses the Federal Transit Authority's (FTA) threshold of 80 dBA (8-hour L_{eq}) for residential uses to evaluate construction noise impacts.²² All motorized equipment used in such activity shall be equipped with functioning mufflers as mandated by the State.

²² Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, Table 7-2, Page 179, September 2018.

Construction activities may also cause increased noise along site access routes due to movement of equipment and workers. Compliance with the Municipal Code would minimize impacts from construction noise, as construction would be limited to daytime hours on weekdays and Saturdays. By following Municipal Code standards, Project construction activities would result in a less than significant noise impact.

Following FTA's methodology for quantitative construction noise assessments, FHWA's Roadway Construction Noise Model (RCNM) was used to predict construction noise. The noise levels calculated in **Table 3.13-2: Project Construction Noise Levels** show estimated exterior construction noise. In accordance with FTA methodology, when calculating construction noise, all construction equipment is assumed to operate simultaneously at a construction area nearest to sensitive receptors to represent a worst-case noise scenario as construction activities would routinely be spread throughout the construction site and would operate at different intervals. Therefore, the distances used in the RCNM model were approximately 375 feet for the nearest residential property (average distance from construction equipment to the nearest residential property line).

Table 3.13-2: Project Construction Noise Levels													
Construction Phase	Land Use	Direction	Distance (feet) ¹	Worst Case Modeled Exterior Noise Level (dBA L _{eq})	Noise Threshold ² (dBA L _{eq})	Exceeded?							
Demolition	Residential	East	375	69.0	80	No							
Site Preparation	Residential	East	375	66.8	80	No							
Grading	Residential	East	375	67.6	80	No							
Construction	Residential	East	375	70.5	80	No							
Paving	Residential	East	375	69.0	80	No							
Architectural Coating	Residential	East	375	56.2	80	No							

1. Per the methodology described in the FTA *Transit Noise and Vibration Impact Assessment Manual* (September 2018), distances are measured from the nearby buildings to the center of the project construction site.

2. The City does not have a quantitative noise threshold for construction and only limits the hours of the construction activities. Therefore, FTA's construction noise threshold is conservatively used for this analysis (FTA, *Transit Noise and Vibration Impact Assessment Manual*, September 2018).

Source: Federal Highway Administration, Roadway Construction Noise Model, 2006. Refer to Appendix J for noise modeling results.

The maximum construction noise levels would not exceed the applicable FTA construction thresholds. The highest exterior noise level at the nearest residential receptors would occur during the building construction stage and would be 70.5 dBA, which is below the FTA's 80 dBA threshold. Construction equipment would operate throughout the project site and the associated noise levels would not occur at a fixed location for extended periods of time. Although sensitive uses may be exposed to elevated noise levels during Project construction, these noise levels would be acoustically dispersed throughout the project site and not concentrated in one area near sensitive uses.

The City of Rialto has set restrictions to control noise impacts from construction activities. Municipal Code Section 9.50.070 states that the erection, alteration, repair, addition, movement, demolition, or improvement of any structure shall only occur between the hours of 7:00 a.m. and 5:30 p.m. on weekdays and between the hours of 8:00 a.m. and 5:00 p.m. on Saturdays from October 1 through April 30 and shall only occur between 6:00 a.m. and 7:00 p.m. on weekdays and between the hours of 8:00 a.m. and 5:00 p.m. on saturdays from Cotober 1 through April 30 and shall only occur between 6:00 a.m. and 7:00 p.m. on weekdays and between the hours of 8:00 a.m. and 5:00 p.m. on Saturdays from May 1 through September 30. It is noted that nighttime construction would be

limited to brief periods should nighttime concrete pours be necessary (i.e., nighttime activities would not occur during the entire construction period). Although the Rialto Municipal Code limits the hours of construction, it does not provide specific noise level performance standards for construction. By following the City's standards, the impact from construction noise would be less than significant level.

Operations

The land use designation for the project site in the Airport Specific Plan is Planned Industrial Development (I-PID). Warehouses are a permitted use in the I-PID. The Airport Specific Plan assumed a maximum FAR of 0.7:1 for planned industrial development. The total area of the proposed project site is 488,624 sf, which at an FAR of 0.7:1 is a maximum allowable building size of 342,037 sf. Noise levels associated with the operation of the proposed use is consistent with those contemplated in the Airport Specific Plan. In addition, the proposed development would generate fewer trips, result in lower operational noise levels associated with on-road trips and on-site parking activity than assumed for the project site in the Airport Specific Plan EIR.

Implementation of the proposed Project would create new sources of noise in the vicinity. The major noise sources associated with the Project would include the following:

- Mechanical equipment (e.g., trash compactors, air conditioners, etc.);
- Slow moving trucks on the project site, approaching and leaving the loading areas;
- Activities at the loading areas (i.e., maneuvering and idling trucks, equipment noise);
- Parking areas (i.e., car door slamming, car radios, engine start-up, and car pass-by); and
- Off-site traffic noise

Mechanical Equipment. The nearest sensitive receptors are residences approximately 15 feet to the east. Potential stationary noise sources related to long-term operation of the project site would include mechanical equipment. Mechanical equipment (e.g., heating ventilation and air conditioning [HVAC] equipment) typically generates noise levels of approximately 52 dBA at 50 feet.²³ For the purposes of a conservative analysis, the closest mechanical equipment is assumed to be at the edge of the proposed warehouse and distribution building, approximately 90 feet to the west of the nearest sensitive receptors. At 90 feet, mechanical equipment noise would be 46.9 dBA, which is well below the City's normally acceptable residential exterior noise standard (60 dBA). Operation of mechanical equipment would not increase ambient noise levels beyond the acceptable compatible land use noise levels. Therefore, the proposed Project would result in a less than significant impact related to stationary noise levels.

Truck and Loading Dock Noise. During loading and unloading activities, noise would be generated by trucks diesel engines, exhaust systems, and brakes during low gear shifting braking activities; backing up toward the loading docks; dropping down the dock ramps; and maneuvering away from the docks. Vehicular access to the project site would consist of two driveways located along Locust Avenue and one driveway along West Coast Boulevard. Trucks would only access the site from Locust Avenue and the truck loading bay and dock doors are on the west side of the warehouse and distribution building. Typically, heavy truck operations generate a noise level of 68 dBA at a distance of 30 feet. The closest sensitive receptors to the loading dock area are residences approximately 100 feet north of the project site. At this distance, noise levels would be 49.5 dBA with considering attenuation from the proposed intervening 14-

²³ Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, Noise Navigator Sound Level Database with Over 1700 Measurement Values, 2015.

foot-high concrete wall²⁴, which is below the City's normally acceptable residential exterior noise standard (60 dBA). Noise levels at other sensitive receptors that are further away would be lower. Loading dock doors would also be surrounded with protective aprons, gaskets, or similar improvements that, when a trailer is docked, would serve as a noise barrier between the interior warehouse activities and the exterior loading area. This would attenuate noise emanating from interior activities, and as such, interior loading and associated activities would be permissible during all hours of the day.

Existing noise is produced at the construction equipment yard on the southern portion of the project site. The existing construction yard is directly adjacent to the residential sensitive receptors, while the proposed warehouse and distribution building and truck yard would be set back approximately 100 feet and 24 feet, respectively, from the eastern property line. The existing noise was not considered in the operational noise analysis; therefore, the analysis is conservative compared to the anticipated operations of the proposed Project. Accordingly, noise levels associated with trucks and loading or unloading activities would not exceed the City's standards and impacts would be less than significant.

Back-Up Alarms. Medium- and heavy-duty trucks reversing into loading docks would produce noise from back-up alarms (also known as back-up beepers). Back-up beepers produce a typical volume of 97 dBA at one meter (3.28 feet) from the source.²⁵ The property line of the nearest sensitive receptor would be located approximately 100 feet north of the loading dock areas where trucks could be reversing and maneuvering. At this distance and considering attenuation from the proposed intervening 14-foot-high concrete wall, exterior noise levels from back-up beepers would be approximately 59.3 dBA, which is below the City's normally acceptable residential exterior noise standard (60 dBA). It is also noted that back-up beeper noise is short in duration and would occur intermittently. Therefore, back-up alarm noise impacts would be less than significant.

Parking Noise. Parking stalls would be located to the east, west, and south of the proposed project site. According to the Traffic Study for the West Coast and Locust Avenue Project (Kimley-Horn, 2024), the Project would generate up to 41 trips during the peak hour. For the purpose of providing a conservative, quantitative estimate of the noise levels that would be generated from the vehicles entering and exiting the parking lot, the methodology recommended by FTA for the general assessment of stationary transit noise sources is used. Using the methodology, the Project's peak hourly noise level that would be generated by the on-site parking levels was estimated using the following FTA equation for a parking lot:

$$L_{eq(h)} = SEL_{ref} + 10 \log (NA/1,000) - 35.6$$

Where:

 $L_{eq(h)}$ = hourly L_{eq} noise level at 50 feet

SEL_{ref} = reference noise level for stationary noise source represented in sound exposure level (SEL) at 50 feet

NA = number of automobiles per hour

35.6 is a constant in the formula, calculated as 10 times the logarithm of the number of seconds in an hour

²⁴ According to the U.S. Department of Transportation, *Federal Highway Administration Roadway Construction Noise Model User's Guide*, 2006, a solid barrier can reduce noise levels by eight dBA.

²⁵ Environmental Health Perspectives, Vehicle Motion Alarms: Necessity, Noise Pollution, or Both? https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3018517/, accessed November 2023.

Using the FTA's reference noise level of 92 dBA SEL²⁶ at 50 feet from the noise source, the Project's highest peak hour vehicle trips would generate noise levels of approximately 42.5 dBA L_{eq} at 50 feet from the parking lot. The nearest sensitive receptors (to the east) are located at least 15 feet from the passenger vehicle parking area. Conservatively assuming that all vehicles would park at a location nearest to sensitive receptors rather than dispersed throughout all available parking and based strictly on distance attenuation, parking lot noise at the nearest receptor would be 53.0 dBA, which is below City's normally acceptable residential exterior noise standard (60 dBA). Therefore, noise impacts from parking lots would be less than significant.

Off-Site Traffic Noise. Implementation of the Project would be consistent with the allowable uses for the project site as determined by the Airport Specific Plan. Therefore, traffic volumes associated with the proposed Project would be consistent with and less than what was anticipated for the site in the Airport Specific Plan EIR. In general, a traffic noise increase of less than 3 dBA is barely perceptible to people, while a 5-dBA increase is readily noticeable.²⁷ Traffic volumes on area roadways would have to approximately double for the resulting traffic noise levels to increase by 3 dBA.²⁸ Therefore, permanent increases in ambient noise levels of less than 3 dBA would be less than significant. Project-related trips would occur along Locust Avenue and West Coast Boulevard. According to the Traffic Scoping Agreement, the proposed Project would generate approximately 391 daily trips. The surrounding area is currently developed with existing industrial and residential uses and an additional 391 daily trips would not result in a doubling of traffic. Therefore, off-site traffic noise would be less than significant.

Ground-borne Vibration and Noise Levels. Increases in ground-borne vibration levels attributable to the proposed Project would be primarily associated with short-term construction-related activities. Construction on the project site would have the potential to result in varying degrees of temporary ground-borne vibration, depending on the specific construction equipment used and the operations involved.

The FTA has published standard vibration velocities for construction equipment operations in their 2018 *Transit Noise and Vibration Impact Assessment Manual*. In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.2 in/sec) appears to be conservative. The types of construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and underground geological layer between vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. For example, for a building that is constructed with reinforced concrete with no plaster, the FTA guidelines show that a vibration level of up to 0.20 in/sec is considered safe and would not result in any construction vibration damage.

The nearest structures to the Project construction site are approximately 15 feet to the east and south, and approximately 65 feet to the north of the project site boundary. **Table 3.13-3: Typical Construction Equipment Vibration Levels**, lists vibration levels at 25 feet and 15 feet for typical construction equipment

²⁶ Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.

²⁷ Federal Highway Administration, Highway Traffic Noise Analysis and Abatement Policy and Guidance, Noise Fundamentals, https://www.fhwa.dot.gov/environMent/noise/regulations_and_guidance/polguide/polguide02.cfm, accessed November 2023.

²⁸ California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, 2013.

based on FTA data. Ground-borne vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. As indicated in Table 3.13-3, at 15 feet, vibration velocities from typical heavy construction equipment operations that would be used during Project construction range from 0.0065 to 0.1915 in/sec PPV at the closest structure, which is below the FTA's 0.20 PPV threshold.

Table 3.13-3: Typical Construction Equipment Vibration Levels										
Equipment	Peak Particle Velocity at 25 Feet (in/sec)	Peak Particle Velocity at 15 Feet (in/sec)								
Large Bulldozer	0.089	0.1915								
Caisson Drilling	0.089	0.1915								
Loaded Trucks	0.076	0.1635								
Jackhammer	0.035	0.0753								
Small Bulldozer/Tractors	0.003	0.0065								
1. Calculated using the following formula: PPV _{equip} = PPV _{ref} x (125/D) ^{1.5} , where: PPV _{equip} = the peak particle velocity in in/sec of the equipment adjusted for the distance: PPV _{equip} = the reference vibration level in in/sec from Table 7-4 of the Federal Transit Administration. <i>Transit Noise</i>										

and Vibration Impact Assessment Manual, 2018; D = the distance from the equipment to the receiver. Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, 2018. It is also acknowledged that construction activities would occur throughout the project site and would not

It is also acknowledged that construction activities would occur throughout the project site and would not be concentrated at the point closest to the nearest structure. Therefore, based on the significance criteria, vibration impacts associated with the proposed Project would be less than significant.

Once operational, the Project would not be a significant source of ground-borne vibration. Ground-borne vibration surrounding the Project currently result from heavy-duty vehicular travel (e.g., refuse trucks, heavy duty trucks, delivery trucks, and transit buses) on the nearby local roadways. Operations of the proposed Project would include truck deliveries. Due to the rapid drop-off rate of ground-borne vibration and the short duration of the associated events, vehicular traffic-induced ground-borne vibration is rarely perceptible beyond the roadway right-of-way, and rarely results in vibration levels that cause damage to buildings in the vicinity. According to the FTA's Transit Noise and Vibration Impact Assessment, trucks rarely create vibration levels that exceed 70 VdB (equivalent to 0.012 inches per second PPV) when they are on roadways. Therefore, trucks operating at the project site or along surrounding roadways would not exceed FTA thresholds for building damage or annoyance. Impacts would be less than significant.

Airport-Related Noise. The nearest airport to the project site is the San Bernardino International Airport located approximately 9.5 miles to the southeast. Therefore, the project site is not within two miles of a public airport or within an airport land use plan. Additionally, there are no private airstrips located within the vicinity. Therefore, the Project would not expose people residing or working in the area to excessive airport- or airstrip-related noise levels and no mitigation is required.

Cumulative Impacts

As discussed above, all construction and operational noise impacts would be less than significant. Construction noise impacts are by nature localized. The distance of separation among the proposed Project and other cumulative projects would be such that the temporary noise and vibration effects of the proposed Project would not be compounded or increased by similar noise or vibration effects from other cumulative projects. As discussed above, operational noise caused by the proposed Project would be less than significant. Due to site distance and these intervening land uses, cumulative stationary noise impacts would not occur. No known projects would compound or increase the operational noise levels generated by the Project. Therefore, cumulative impacts relative to temporary and permanent noise generation associated with the proposed Project would be less than significant and within the level of impacts analyzed in the Airport Specific Plan EIR.

Mitigation Program

The Airport Specific Plan EIR includes measures to reduce potential impacts associated the implementation of the Airport Specific Plan project.

Mitigation Measure 5.8-3G, as stated below, has been satisfied through the preparation of this noise analysis for the proposed Project.

MM 5.8-3G The project applicant shall submit detailed design plans and an acoustical study, prepared by a City-approved acoustical expert, for each site plan, which delineates appropriate setbacks from adjacent existing and/planned sensitive receptors, which is consistent with City of Rialto Noise Standards. The study shall demonstrate that all feasible sound attenuation has been incorporated into the design, such as noise walls and other noise barriers, and other appropriate measures. [NOTE: This measure has been satisfied through the preparation of this Acoustical Assessment.]

The following measures from the EIR are applicable to the proposed Project: Mitigation Measures 5.8-1A through 5.8-1D, and 5.8-2A through 5.8-2E.

- **MM 5.8-1A** Construction activities shall comply with the City of Rialto Noise Standards relating to construction noise. Enforcement of City standards relating to construction-related noise discernable at residential boundaries is required and construction activities shall be limited to the hours between 7:00 a.m. and 7:00 p.m. Monday through Saturdays (excluding Sundays and Federal holidays).
- **MM 5.8-1B** All construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers, to the satisfaction of the City Engineer.
- **MM 5.8-1C** Stationary construction equipment shall be staged such that emitted noise is directed away from sensitive noise receivers, to the satisfaction of the City Engineer.
- **MM 5.8-1D** Stockpiling and vehicle staging areas shall be located as far as practical from noise sensitive receptors during construction activities, to the satisfaction of the City of Engineer.
- **MM 5.8-2A** The project applicable shall submit detailed design plans and an acoustical study, prepared by a City-approved acoustical expert, for each site plan, which delineates appropriate setbacks from adjacent existing and planned sensitive receptors, which is consistent with City of Rialto Noise Standards. The study shall demonstrate that all feasible sound attenuation has been incorporated into the design, such as noise walls and other noise barriers, and other appropriate measures (refer also to Mitigation Measure No. 5.8-3). [NOTE: This MM has been satisfied through the preparation of this Acoustical Assessment.]

- **MM 5.8-2B** Development of the proposed project land uses shall adhere to City of Rialto and California State Noise Insulation Standards (California Administrative Code, Title 25, Chapter 1, Subchapter 1, Article 4). These standards require that the interior noise levels for residential living spaces and for hotel rooms be no greater than 45 dB CNEL. If additional attenuation is necessary, measures (i.e. increases in window STC rating, reduction of window area) can be specified at such time.
- **MM 5.8-2C** Any loudspeaker system installation shall conform to the following standards:
 - a. The use of a hand held paging system shall be encouraged. A combination of loudspeakers and hand held paging may be authorized upon review of the system by City of Rialto.
 - b. The outdoor loudspeakers system shall have limited hours of operation, to the satisfaction of the Development Services Director. In no event shall any use of outdoor speakers be authorized for operation on weekends or holidays.
 - c. All loudspeakers shall be mounted at a 75 degree angle facing the ground to avoid voice travel. All loudspeakers mounted on perimeter walls shall be located at least two (2) feet below the top of the wall.
 - d. All loudspeakers shall be directed toward the interior of each lot. Each speaker layout system shall be subject to review and approval by the Development Services Department.
- **MM 5.8-2D** Mechanical equipment shall be located and designed so that it will not be audible at adjacent residential land uses. This includes adhering to specifications for quiet equipment, and locating/shielding equipment away from homes. It is recommended that any mechanical equipment be located on the side of the building furthest from residential areas and/or constructed with a parapet surrounding the equipment.
- **MM 5.8-2E** The following measures are recommended to minimize noise impacts from activities within parking areas:
 - a. Maximize the use of berms and landscaping to help shield and attenuate noise from cars within parking lots.
 - b. Loading dock should be located away from residential areas. Loading hours should be limited so that deliveries do not occur between midnight and 6 a.m.

Conclusion

Based on the comparative analysis set forth in this Addendum, no new impacts relative to noise or an increase in the severity of a previously identified significant impact evaluated in the Airport Specific Plan EIR would occur. With regard to PRC Section 21166 and State CEQA Guidelines Section 15162(a), the Project would not result in any new impacts, or increase the severity of the previously identified impacts. There are no substantial changes to the circumstances under which the proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the Airport Specific Plan EIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the Airport Specific Plan EIR was certified is available that would impact the prior finding of less than significant with mitigation. Therefore, preparation of a subsequent environmental analysis is not warranted.

3.14 Population and Housing

- Threshold (a) Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of road or other infrastructure?
- Threshold (b) Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

Summary of Impacts Identified in the Airport Specific Plan EIR

The Airport Specific Plan EIR proposed approximately 117 acres of residential land uses, most of which was comprised of existing residential neighborhoods. At the time that the Airport Specific Plan EIR was prepared, the CEQA Appendix G checklist did not evaluate impacts to population and housing as a separate threshold; however, Section 5.10, Parks and Recreation and Open Space, estimated the potential population growth. Accordingly, The Airport Specific Plan EIR assumed that the Airport Specific Plan buildout would result in an increase in population to approximately 1,923 persons in the Airport Specific Plan area. An estimated 155 to 160 new residential units were expected to be constructed as a result of implementation of the Airport Specific Plan, resulting in a net increase of 81 to 86 residential units in the Airport Specific Plan area, accounting for non-conforming residential uses that would eventually be replaced with non-residential uses. Further, analysis of ways in which the Airport Specific Plan could directly or indirectly foster economic or population growth, or the construction of additional housing was analyzed in Section 6.3, Growth Inducing Impacts of the Proposed Project, of the Airport Specific Plan EIR, which determined that employees of commercial and industrial uses in the Airport Specific Plan area would likely be drawn predominantly from the existing labor pool in the cities of Rialto, Fontana, and San Bernardino, and the surrounding subregion and employees that might choose to relocate to housing closer to the Airport Specific Plan area, would do so over time, as the land uses are developed. Therefore, the demand for housing over time was expected to be satisfied by existing and proposed housing in the area. Additionally, the Airport Specific Plan was found to be generally consistent with the City General Plan and zoning designations and was not anticipated to result in growth-inducing impacts related to population or housing. The Airport Specific Plan EIR did not identify any impacts; therefore, mitigation was not required.

Project-Specific Analysis and Significance Determination: No new impact; no substantial change from previous analysis.

The Project would result in the construction of an industrial warehouse and distribution building, including an office component. Development of the project site was anticipated as a part of the Airport Specific Plan area and is consistent with the project site's zoning; no significant impacts were identified. Additionally, no residential development is proposed as a part of the Project. The land use designation for the project site in the Airport Specific Plan is Planned Industrial Development (I-PID). Warehouses are a permitted use in the I-PID. The Airport Specific Plan assumed a maximum FAR of 0.7:1 for planned industrial development. The total area of the proposed project site is 488,624 sf, which would result in a maximum allowable building size of 342,037 sf. As such, the proposed development which proposed under the maximum development envelope previously analyzed would have fewer employees than assumed in the Airport Specific Plan for the project site. Consistent with the Airport Specific Plan EIR, no population and housing impacts would occur as a result of the Project. As of September 2023, unemployment in San Bernardino County was 4.8 percent and within the City of Rialto, it was 5.1 percent ²⁹. The Project would create new jobs and increase the demand for new employees. By providing jobs, the Project is expected to benefit the local community while having little effect on population growth. The growth that would occur as a result of the proposed Project is accounted for in the General Plan, which indicates that the site has a Business Park land use designation with a Specific Plan Overlay. The Light Industrial land use designation allows for a mix of commercial, office, research and development, laboratories, and light industrial uses. The Airport Specific Plan identifies the project site as Planned Industrial Development (I-PID), which allows industrial land uses like warehousing, distribution, manufacturing, and related office areas.

Given the need for jobs to meet the existing population and the relatively small number of jobs created by the Project compared to those on a regional basis, the Project would not induce substantial population growth. Although the Project would create job opportunities, an industrial project such as this is not considered inherently growth inducing relative to other land use categories.

With respect to indirect effects, roadways near the project site include Locust Avenue to the west, West Coast Boulevard to the north, and SR-210 to the south. The Project would provide two driveways on Locust Avenue and one driveway on West Coast Boulevard. In addition, infrastructure (water, sewer, electrical) is located within the immediate vicinity of the project site and these services would be extended to the site to serve the Project. The Project does not include the extension of roads or other infrastructure to unserved areas, which could induce indirect growth. Therefore, the Project would not result in any adverse change in the population, housing, or employment projections developed by or for the City of Rialto. Impacts would be less than significant, and no mitigation is required.

The northern portion of the project site is currently vacant and the southern portion of the project site is paved and currently used for construction equipment storage. The Project does not include the removal or construction of habitable structures. Therefore, Project implementation would not displace existing housing, necessitating the construction of replacement housing. No impacts would occur and no mitigation is required. The Project would cause neither a new impact to occur nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Cumulative Impacts

As discussed above, the Project would not cause an impact to population and housing to occur, nor an increase in the severity of any impacts previously disclosed in the Airport Specific Plan EIR. The Airport Specific Plan was found to be generally consistent with the City General Plan and zoning designations and was not anticipated to result in growth-inducing impacts related to population or housing. Therefore, the Project would not cause either a new cumulative impact to occur, nor an increase in the severity of a cumulative impact previously disclosed.

Mitigation Program

No mitigation measures are required.

²⁹ California Employment Development Department. (2023). Monthly Labor Force Data for Cities and Census Designated Places (CDP). https://www.labormarketinfo.edd.ca.gov/data/labor-force-and-unemployment-for-cities-and-census-areas.html. Accessed November 2023.

Conclusion

Based on the comparative analysis set forth in this Addendum and consistent with the Airport Specific Plan EIR, the Project would have no impact on population and housing. With regard to PRC Section 21166 and State CEQA Guidelines Section 15162(a), the Project would not result in any new impacts, or increase the severity of the previously identified impacts. There are no substantial changes to the circumstances under which the Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the Airport Specific Plan EIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the Airport Specific Plan EIR was certified is available that would impact the prior finding of less than significant. Therefore, preparation of a subsequent environmental analysis is not warranted.

3.15 Public Services

- Threshold (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 <u>fire protection</u>?
- Threshold (b) 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 <u>police protection</u>?
- Threshold (c) 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 <u>schools</u>?
- Threshold (d) 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 <u>parks</u>?
- Threshold (e) 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 <u>other public facilities</u>?

Summary of Impacts Identified in the Airport Specific Plan EIR

Fire Protection. Fire protection and paramedic services are provided by the Rialto Fire Department. The Airport Specific Plan EIR concluded that impacts to fire services from implementation of the Airport Specific Plan were less than significant with mitigation, specifically compliance with all applicable code and ordinance requirements for construction access, water mains, fire flows, and fire hydrants, and through the payment of fire protection development impact fees as identified in Mitigation Measures 5.11-1A, 5.11-1B, 5.11-1C, and 5.11-2A.

Police Protection. The Rialto Police Department provides law enforcement services to the City of Rialto, inclusive of the Airport Specific Plan area. The Airport Specific Plan EIR determined that police services via calls for service, police enforcement, and protection would increase as development occurs throughout the Airport Specific Plan area. The Airport Specific Plan EIR identified Mitigation Measure 5.11-3A to address increased demand for police services, including Police Department review of site plans to ensure adequate access and lighting is provided, and payment of police protection development impact fees.

Schools. The Rialto Unified School District (School District) serves the Airport Specific Plan area and residents in the surrounding area. The Airport Specific Plan EIR noted that schools in the School District

that would serve area residents were at, or near capacity. The Airport Specific Plan EIR identified Mitigation Measure 5.11-4B to address school impacts, including School District review of tentative tract maps to help ensure that adequate school facilities and services are planned, as well as the payment of school development impact fees.

Parks. Please refer to Section 3.16, Recreation.

Other Public Facilities. The Airport Specific Plan EIR did not address impacts related to other public facilities including libraries. However, the Airport Specific Plan EIR did note that existing City policy provided for the development of supplemental funding sources for libraries. Although the Airport Specific Plan did not call for the provision of funding for library services, induced population growth associated with the buildout of the original Airport Specific Plan area would result in increased funding for the library system.

Project-Specific Analysis and Significance Determination: No new impact; no substantial change from previous analysis.

Fire Protection. The Project would result in the construction of an industrial warehouse and distribution facility, inclusive of 10,000 sf of ancillary office space. The Project does not involve any residential development and therefore is not expected to substantially increase service demand such that new or altered facilities would need to be constructed. The closest fire station, Rialto Fire Station No. 204, is located at 3288 Alder Avenue, approximately 0.6 mile east of the project site.³⁰ Consistent with Municipal Code Section 3.33.220, Fire Protection Facilities Development Fee, the Project would be required to pay a fee to ensure a proportionate fair share is contributed toward facilities, equipment, and personnel that would be needed over time to accommodate any additional incremental demand from future development including the Project. The Project does not propose or require new or physically altered fire station facilities.

Police Protection. The project site is in a currently developed area served by the Police Department. The closest police station is located at 128 N. Willow Avenue, approximately 4.2 miles southeast of the project site.³¹ Because of this, and because law enforcement personnel already patrol the area, the Project is not anticipated to increase response times to the project site or surrounding area. Further, the Project would be required to comply with Municipal Code Section 3.33.210, Law Enforcement Facilities Development Impact Fee, which requires all development projects to pay a fee to account for any cost increases associated with the law enforcement facilities, equipment, and training resulting from Project implementation. The Project does not propose or require new or physically altered police protection facilities.

Schools. The Project is a non-residential development. Implementation of the Project would not directly result in increased population in the City and therefore, would not increase the need for the construction of additional school facilities. The Project would be required to comply with SB 50 requirements, which allows school districts to collect impact fees from developers of new projects. In compliance with SB 50, the School District requires a development fee for New Commercial/Industrial Construction to be paid by an applicant.³² As stated in Government Code Section 65995(h), "The payment or satisfaction of a fee, charge, or other requirement levied or imposed ...are hereby deemed to be full and complete mitigation

³⁰ City of Rialto. (2010). City of Rialto General Plan. https://www.yourrialto.com/Facilities?clear=False. Accessed March 2023.

³¹ Rialto Police Department. (2023). *Our Department*. https://rialtopolice.com/our-department. Accessed March 2023.

³² Rialto Unified School District. (2022). Developer Fee. https://kec.rialto.k12.ca.us/Page/1939. Accessed March 2023.

of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization ...on the provision of adequate school facilities."

Cumulative

As discussed above, the Project would not cause a new public services impact to occur, nor an increase in the severity of any public service impacts previously disclosed in the Airport Specific Plan EIR. The Airport Specific Plan did not identify any potential significant cumulative impacts associated with the provision of public services addressed in the EIR. The Project would not cumulatively contribute to any impacts to public services.

Mitigation Program

Mitigation Measures 5.11-1A, 5.11-1B, 5.11-1C, 5.11-2A, 5.11-3A, and 5.11-4B from the Airport Specific Plan EIR are applicable to the Project. Mitigation Measure 5.11-3B is no longer applicable because development fees have been established by the City for police protection services. Mitigation Measure 5.11-4A is not applicable because the Project does not require approval of a tract map.

- **MM 5.11-1A** Prior to issuance of building permits, project developers shall comply with all applicable code and ordinance requirements as required by the City of Rialto for construction, access, water mains, fire flows, and fire hydrants.
- **MM 5.11-1B** At time of issuance of building permits, developers shall be required to participate in any City-wide fire protection impact fee program(s).
- **MM 5.11-1C** Temporary construction roads and water supplies for firefighting shall be required to provide adequate access for emergency vehicles. Construction contractors shall be required to prepare and implement temporary fire control systems and plans consistent with the requirements of the City's Fire Department. The Fire Department shall review all construction plans to ensure adequate emergency access and water for fire protection to the entire Specific Plan area.
- **MM 5.11-2A** Prior to any final entitlements for specific projects in the Specific Plan area, the project developer shall be required to provide evidence to the Fire Department that the proposed infrastructure and fire protection requirements and emergency services would be adequate to serve the proposed development. This evidence shall define phasing and project implementation.
- **MM 5.11-3A** Prior to issuance of building permits, site plans shall undergo review by the Rialto Police Department to ensure that: one, adequate access to the site is provided; and two, that all entryways, lobbies, stairways, and parking areas are illuminated and visually isolated areas shall be minimized for public safety purposes.
- **MM 5.11-4B** Developers shall be required to contribute their fair share to school impact fees.

Conclusion

Based on the comparative analysis set forth in this Addendum, no new impacts relative to public services or an increase in the severity of a previously identified significant impact evaluated in the Airport Specific Plan EIR would occur. With regard to PRC Section 21166 and State CEQA Guidelines Section 15162(a), the Project would not result in any new impacts, or increase the severity of the previously identified impacts. No new information of substantial importance that was not known and could not have been known at the time the Airport Specific Plan EIR was certified is available that would impact the prior finding of less than significant with mitigation. Therefore, preparation of a subsequent environmental analysis is not warranted.

3.16 Recreation

- Threshold (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?
- Threshold (b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which have an adverse physical effect on the environment?

Summary of Impacts Identified in the Airport Specific Plan EIR

The Rialto Recreation, Park, and Social Services Department manages recreational facilities in the City of Rialto, inclusive of the Airport Specific Plan area. The City's parkland standard is 3 acres per 1,000 residents. The Airport Specific Plan EIR identified that the Airport Specific Plan implementation would increase the City's population and create a demand for approximately 4.9 to 5.8 acres of parkland. This was considered a less than significant impact because the analysis concluded that the majority of the persons residing in the Airport Specific Plan area would use the 22-acre Jerry Eaves Park, located at 1485 N. Ayala Drive, in the Airport Specific Plan area. The analysis also noted that the City as a whole did not meet the goal of 3 acres of parkland per resident. Mitigation Measures 5.10-1 and 5.10-2 were identified, including the collection of developer fees as permitted by the Quimby Act and design review for commercial recreation projects. The Airport Specific Plan EIR concluded that ensuring that new projects conform with existing City regulations and fee programs, and Specific Plan regulations and guidelines (e.g., recreation overlays within certain parts of the Airport Specific Plan area) would further reduce impacts on recreational facilities and create certain beneficial impacts.

Project-Specific Analysis and Significance Determination: No new impact/reduced impact; no change from previous analysis.

Development of the project site with non-residential uses was assumed in the Airport Specific Plan. The Project does not include residential development, which would directly increase population and result in increased demand for parks and recreational facilities. Accordingly, implementation of the Project would not generate an increase in demand on existing public or private parks or other recreational facilities that could result in substantial physical deterioration of the City's parks and recreational facilities. The City of Rialto requires the payment of development fees for public facilities maintained in the City for uses including but not limited to parks and recreation. The proposed Project would be subject to Municipal Code Section 3.33.190, General Municipal Facilities Development Impact Fee. In addition, the proposed project site has a Light Industrial land use designation with a Specific Plan Overlay and is not identified in the Rialto General Plan as a park or open space resource. The Project does not include the construction of recreational facilities, nor would it require the construction or expansion of recreational facilities. Therefore, no impact to existing recreational facilities would occur and no mitigation is required.

Cumulative Impacts

Under the significance criteria for recreation, potential cumulative impacts could occur if the project when combined with cumulative projects—would include new recreational facilities or require the construction or expansion of recreational facilities that might adversely affect the environment in order to maintain acceptable service ratios or other performance objectives for parks; or increase the use of the existing neighborhood and regional parks or other recreational facilities such that a substantial physical deterioration of the facilities would occur or be accelerated. The Airport Specific Plan identified that with mitigation, buildout of the Airport Specific Plan area could result in beneficial impacts. The Project would not cause the need for new or expanded recreational facilities or result in substantial physical deterioration of existing facilities. As discussed above, the Project would not cause an increase in the severity of recreational impacts previously disclosed in the Airport Specific Plan EIR. Implementation of the Project would not result in project-specific recreational impacts nor cumulatively contribute to recreation impacts.

Mitigation Program

Mitigation Measure 5.10-1 from the Airport Specific Plan EIR is not applicable to the Project because it is not subject to the Quimby Act. Mitigation Measure 5.10-2 is not applicable to the Project because the Project is not a commercial recreation use.

Conclusion

Based on the comparative analysis set forth in this Addendum, no new impacts relative to recreation or an increase in the severity of a previously identified significant impact evaluated in the Airport Specific Plan EIR would occur. With regard to PRC Section 21166 and State CEQA Guidelines Section 15162(a), the Project would not result in any new impacts, or increase the severity of the previously identified impacts. There are no substantial changes to the circumstances under which the Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the Airport Specific Plan EIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the Airport Specific Plan EIR was certified is available that would impact the prior finding of less than significant with mitigation. Therefore, preparation of a subsequent environmental analysis is not warranted.

3.17 Transportation

- Threshold (a) Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
- Threshold (b) Would the project conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?
- Threshold (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)?

Threshold (d) Would the project result in inadequate emergency access?

Summary of Impacts Identified in the Airport Specific Plan EIR

The Airport Specific Plan EIR evaluated existing traffic conditions and existing plus project conditions and concluded that implementation of the Airport Specific Plan would contribute traffic greater than the San Bernardino County Congestion Management Program (CMP) threshold volume of 100 two-way trips to State Highways (Route 30 Freeway, I-15, and I-215). The Airport Specific Plan EIR also found that the Airport Specific Plan would contribute more than 80 trips (the CMP Roadway threshold volume) along roadway segments serving CMP intersections within the cities of Fontana and San Bernardino, as well as the County of San Bernardino. This was considered an unavoidable impact. Although roadways in the study area would experience heavier traffic conditions as a result of Airport Specific Plan development, implementation of the mitigation measures, such as a requirement for individual developments to provide a traffic analysis to determine fair share contribution to circulation improvements, construction of busturn outs and bus stops by individual developments, and requiring bicycle racks with commercial developments, were determined to reduce impacts to less than significant levels.

Project-Specific Analysis and Significance Determination: Reduced Impact; change from previous analysis. A Traffic Study was prepared by Kimley-Horn in May 2024 to evaluate potential traffic-related impacts associated with the Project. The Traffic Study is included as **Appendix K** to this Addendum.

Methodology. When the Airport Specific Plan EIR was approved in 1997, the applicable traffic threshold was Level of Service (LOS). On September 27, 2013, SB 743 was signed into law and started a process that would change the methodology and significance criteria for transportation impact analyses as part of CEQA compliance. These changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as a basis for determining significant environmental impacts. On January 20, 2016, the State of California Office of Planning and Research (OPR) released revisions to its proposed CEQA Guidelines for the implementation of SB 743, and final review and rulemaking for the new guidelines were completed in December 2018. OPR allowed lead agencies an opt-in period to adopt the guidelines before the mandatory date adoption of July 1, 2020.

Level of Service was the applicable threshold when the City certified the Airport Specific Plan EIR. The mandate requiring lead agencies to use Vehicle Miles Traveled (VMT) as a threshold for evaluating traffic impacts was adopted in 2018 and became effective in 2020. The potential environmental impacts regarding the amount of travel associated with the Airport Specific Plan were known at the time that Airport Specific Plan EIR was certified.

Trip Generation. The Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition was used to develop trip generation characteristics of the Project. The Project is most comparable to Warehousing (Land Use Code 150), which is consistent with the City of Rialto Traffic Impact Analysis Guidelines for VMT and LOS (October 2021) which states Warehousing (Land Use Code 150) shall be used for all warehousing projects. The truck rates, truck mixes and Passenger Car Equivalents (PCEs) for warehousing follow the City's Guidelines. The estimated trip generation is shown in **Table 3.17-1: Trip Generation**. The Project is estimated to generate 655 PCE trips per day with 65 PCE trips during the AM peak hour and 68 PCE trips during the PM peak hour.

The land use designation for the project site in the Airport Specific Plan is Planned Industrial (I-PID). Industrial land uses may include warehousing, manufacturing, and multi-tenant spaces. Key requirements for these industries include large parcels, designated truck access routes, and appropriate utility connections. Warehouses are a permitted use in the I-PID. Based on the land use designation and the maximum FAR of 1. Applying the 11th Edition of ITE to the Warehousing Land Use Code 150, development of the project site with 225,173 sf industrial uses is estimated to generate of 655 PCE trips per day, with 65 PCE trips during the AM peak hour and 68 PCE trips during the PM peak hour. It should be noted that the trip estimates for the proposed Project based on the ITE Trip Generation Manual are expected to be very conservative compared to the anticipated operations of the proposed Project.

It should be noted that existing driveway counts for a similar site were conducted on two typical weekdays in December 2021 to estimate existing operations at the project site. The existing use trips are noted in the Scoping Agreement (**Appendix K**). The existing use credit would be applied when determining traffic development impact fees (DIF) for the proposed Project.

Trip Distribution. The trip distribution is based on expected travel patterns to/from the site from areas in Rialto and other surrounding communities. Truck distributions use designated truck routes and are routed in the direction of intended travel to the nearest freeways while per the City of Rialto Guidelines. The distribution also reflects that the SR-210 Alder Avenue interchange provides the shortest travel times and most direct routing to the site for passenger vehicle and trucks traveling from the west. The trip distribution for passenger vehicles and trucks is summarized below:

Passenger Vehicles

- 30% to/from the east along Riverside Avenue (east of Locust Avenue)
- 20% to/from the east along SR-210, using Ayala Drive interchange
- 5% to/from the north along Riverside Avenue (west of Locust Avenue)
- 30% to/from the west along SR-210, using Alder Avenue interchange
- 15% to/from the south along Locust Avenue

Trucks

- 20% to/from the north along Riverside Avenue (west of Locust Avenue)
- 30% to/from the east along SR-210, using Alder Drive interchange
- 20% to/from the south along Locust Avenue
- 30% to/from the west using SR-210, using Alder Avenue interchange

Table 3.17-1: Tri	o Generat	ion											
Trip Generation Rates ¹													
					AN	l Peak H	our	PM Peak Hour					
ITE Land Use		ITE Code	Unit	Daily	In	Out	Total	In	Out	Total			
Warehousing		150	KSF	1.710	0.131	0.039	0.170	0.050	0.130	0.180			
Project Trip Gener	ation												
					AN	И Peak H	lour	PN	/I Peak H	our			
Land Use		Quantity	Unit	Daily	In	Out	Total	In	Out	Total			
Warehousing		22.8.413	KSF	391	30	9	39	11	30	41			
Passenger Vehicles 60.00%				235	18	5	23	7	18	25			
Truck			156	12	4	16	4	12	16				
Warehousing Proj	ect Trips - F	Passenger Ca	r Equivale	nts (PCE)									
	Vehicle	Daily	PCE		AN	И Peak H	lour	PN	/I Peak H	our			
Vehicle Type	Mix ³	Vehicles	Factor ³	Daily	In	Out	Total	In	Out	Total			
Passenger Vehicles	60.0%	235	1.0	235	18	5	23	7	18	25			
2-Axle Trucks	0.8%	3	1.5	5	0	0	0	0	0	0			
3-Axle Trucks	11.2%	44	2.0	88	7	2	9	2	7	9			
4+ Axle Trucks	28.0%	109	3.0	327	25	8	33	9	25	34			
Total Truck PCE Tr	420	32	10	42	11	32	43						
Total Project PCE	Frips			655	50	15	65	18	50	68			
PCE = Passenger Car Eq	uivalent; KSF :	= thousand squa	re feet		•	·	•	•					

1. Source: Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 11th Edition

2. Source: City of Rialto Traffic Impact Analysis Report Guidelines and Requirements

Existing Traffic Volumes

Existing Delay and Level of Service

Peak Hour Operating Conditions. The Traffic Study included an Intersection Level of Service analysis, which was conducted for the morning and evening peak hours using the analysis procedures and assumptions described in **Appendix K.** The results of the intersection analysis for Existing Conditions are shown on **Table 3.17-2: Summary of Existing Intersection Operations.** Review of this table indicates that the following study intersections currently operate at unacceptable levels of service under Existing Conditions:

- #1 Locust Avenue at Casa Grande Drive: PM LOS F
- #2 Locust Avenue at West Coast Boulevard: AM LOS E

The Level of Service for an unsignalized intersection is reported based on the single approach movement with the highest delay, which in this case, would be the eastbound approach for intersection #1 and the westbound approach for intersection #2. While the side street approach operates at a deficient Level of Service based on the highest delay approach, the overall intersection delay would be acceptable. Any queuing that occurs on the side street is contained on the minor intersection approach and does not impact the progression of traffic on the main arterial (i.e., Locust Avenue).

Table 3.17-2: Summary of Existing Intersection Operations											
		Traffic	AM Pea	ak Hour	PM Peak Hour						
Int. #	Intersection	Control	Delay	LOS	Delay	LOS					
1	Locust Avenue at Casa Grande Drive	U	33.4	D	60.7	F					
2	Locust Avenue at West Coast Boulevard	U	35.8	E	24.2	С					
3	Locust Avenue at Casmalia Street S 27.5 C 29.1 C										
Notes: - Bold va	Notes:										

Delay values for unsignalized intersections represent the average vehicle delay on the worst (highest delay) intersection approach.

Projected Future Traffic

Opening Year 2025

Peak Hour Operating Conditions. An Intersection Level of Service analysis was conducted for Opening Year 2025. Consistent with the approved Traffic Scoping Agreement (Appendix K) and standard practice in the City, an ambient growth rate of 2.0 percent per year to Opening Year 2024 was applied to the existing peak hour traffic volumes to develop Opening Year 2025 forecasts. The results of the intersection analysis for Opening Year 2025 are shown on Table 3.17-3: Summary of Intersection Operation, Opening Year 2025 Conditions. With the addition of ambient growth, the following traffic study area intersections would continue to operate at an unacceptable level of service:

#1 – Locust Avenue at Casa Grande Drive: AM – LOS E; PM – LOS F

Table 3.17-3: Summary of Intersection Operation, Opening Year 2025 Conditions											
		Traffic	AM Pea	ak Hour	PM Peak Hour						
Int. #	Intersection	Control	Delay	LOS	Delay	LOS					
1	Locust Avenue at Casa Grande Drive	U	37.3	E	77.3	F					
2	Locust Avenue at West Coast Boulevard	U	38.7	E	25.6	D					
3	Locust Avenue at Casmalia Street	S	27.7	С	29.9	С					
Notes:											

#2 – Locust Avenue at West Coast Boulevard: AM – LOS E

Bold values indicate intersections operating at an unacceptable Level of Service

- Delay values for unsignalized intersections represent the average vehicle delay on the worst (highest delay) intersection approach.

Project Traffic

Opening Year 2025 Plus Project

Peak Hour Operating Conditions. An Intersection Level of Service analysis was conducted for the Opening Year 2025 Plus Project conditions. The results of the intersection analysis are shown on Table 3.17-4: Summary of Intersection Operation Opening Year 2025 Plus Project Conditions. With the addition of project traffic, the following study intersections would continue to operate at an unacceptable level of service:

- #1 Locust Avenue at Casa Grande Drive: AM LOS E; PM LOS F
- #2 – Locust Avenue at West Coast Boulevard: AM – LOS E

Tabl	Table 3.17-4: Summary of Intersection Operation Opening Year 2025 Plus Project Conditions													
			AM Peak Hour						PM Peak Hour					
		With Proj	Without Project		Project	Change	Sig	Without Project		With Project		Change	Sig	
Int. #	Intersection	Delay	LOS	Delay	LOS	Delay?	Effect?	Delay	LOS	Delay	LOS	Delay?	Effect?	
1	Locust Ave at Casa Grande Dr	37.3	E	39.1	E	1.8	No	77.3	F	84.4	F	7.1	No	
2	Locust Ave at West Coast Blvd	38.7	E	41.5	E	2.8	No	25.6	D	26.6	D	1.0	No	
3	Locust Ave at Casmalia St	27.7	С	28.1	С	0.4	No	29.9	С	30.3	С	0.4	No	
D1	Locust Ave at North Project Driveway	-	-	23.1	С	-	No	-	-	17.2	С	-	No	
D2	Locust Ave at South Project Driveway	-	-	23.8	С	-	No	-	-	18.1	С	-	No	
D3	West Coast Blvd at Project Driveway	-	-	8.7	А	-	No	-	-	8.6	A	-	No	
Notes	:													

- Bold values indicate intersections operating at an unacceptable Level of Service

- Delay values for unsignalized intersections represent the average vehicle delay on the worst (highest delay) intersection approach.

Opening Year 2025 Cumulative Conditions

Cumulative Projects, Cumulative Projects Trip Generation, and Trip Distribution

In addition to ambient growth, traffic volumes for Cumulative Projects (approved and pending projects) were added to the Opening Year 2025 traffic volumes. Cumulative Projects consist of any project that has been approved and is not yet occupied, and projects that are in various stages of the application and approval process but have not yet been approved. A summary of Cumulative Projects in the project vicinity and the trip generation associated with each is provided in **Appendix K**.

Trip generation information for the Cumulative Projects was derived either from approved traffic studies, where available; or developed by Kimley-Horn if approved traffic studies were not available. Project information and trip generation assumptions for Cumulative Projects are provided in **Appendix K.**

Likewise, trip distribution and assignment for the Cumulative Projects were either derived from approved traffic studies, where available; or were developed by Kimley-Horn if approved traffic studies were not available. Trip distribution assumptions for Cumulative Projects are provided in **Appendix K.**

Peak Hour Operating Conditions. Cumulative Project peak hour traffic volumes for were added to Opening Year 2025 traffic volumes to develop Opening Year 2025 Cumulative traffic volumes. Intersection Level of Service results for Opening Year 2025 Cumulative conditions are shown on **Table 3.17-5**: **Summary of Intersection Operation Opening Year 2025 Cumulative Conditions.** With the addition of Cumulative Project traffic, the following intersections would continue to operate at an unacceptable level of service:

- #1 Locust Avenue at Casa Grande Drive: AM LOS E; PM LOS F
- #2 Locust Avenue at West Coast Boulevard: AM LOS E

Table 3.17-5: Summary of Intersection Operation, Opening Year 2025 Cumulative Conditions											
		Traffic	AM Pea	PM Peak Hour							
Int. #	Intersection	Control	Delay	LOS	Delay	LOS					
1	Locust Avenue at Casa Grande Drive	U	48.5	Е	146.1	F					
2	Locust Avenue at West Coast Boulevard	U	46.5	E	31.0	D					
3	Locust Avenue at Casmalia Street	S	29.1	С	31.1	С					
Notes: Image: Control of the section of the sectin of the section of the section of the section											

Opening Year 2025 Cumulative Conditions

Peak Hour Operating Conditions. Project traffic was added to Opening Year 2025 Cumulative traffic volumes to develop Opening Year 2025 Cumulative Plus Project traffic forecast volumes. Intersection Level of Service analysis results under Opening Year 2025 Cumulative Plus Project conditions are shown on **Table 3.17-6: Summary of Intersection Operation Opening Year 2025 Cumulative Plus Project.** As this table indicates, with the addition of project traffic, the following intersections would continue to operate at an unacceptable Level of Service:

#1 – Locust Avenue at Casa Grande Drive: AM – LOS E; PM – LOS F

Table	Table 3.17-6: Summary of Intersection Operation, Opening Year 2025 Cumulative Plus Project													
				AM	Peak	Hour		PM Peak Hour						
	-		Vithout V Project Pr		th ect	Change	Sig	Without Project		With Project		Change	Sig	
Int. #	Intersection	Delay	LOS	Delay	LOS	Delay?	Effect?	Delay	LOS	Delay	LOS	Delay?	Effect?	
1	Locust Ave at Casa Grande Dr	48.5	E	51.4	F	2.9	No	146.1	F	161.2	F	15.1	No	
2	Locust Ave at West Coast Blvd	46.5	E	50.3	F	3.8	No	31.0	D	32.5	D	1.5	No	
3	Locust Ave at Casmalia St	29.1	С	29.5	С	0.4	No	31.1	С	31.3	С	0.2	No	
D1	Locust Ave at North Project Driveway	-	-	26.1	D	-	No	-	-	19.5	С	-	No	
D2	Locust Ave at South Project Driveway	-	-	27.0	D	-	No	-	-	20.6	С	-	No	
D3	West Coast Blvd at Project Driveway	-	-	8.7	А	-	No	-	-	8.6	А	-	No	

#2 – Locust Avenue at West Coast Boulevard: AM – LOS E

Notes:

- Bold values indicate intersections operating at an unacceptable Level of Service

- Delay values for unsignalized intersections represent the average vehicle delay on the worst (highest delay) intersection approach.

Traffic Signal Warrants

The following unsignalized study intersections would operate an unacceptable level of Service under all analysis scenarios:

- Locust Avenue at Casa Grande Drive
- Locust Avenue at West Coast Boulevard

A traffic signal warrant analysis was conducted for the deficient unsignalized intersections based on the 2014 California Manual on Uniform Traffic Control Devices (CA MUTCD). The warrants were conducted using Warrant 3 (Peak Hour Warrant) for the following analysis scenarios:

- Existing Conditions
- Opening Year 2025
- Opening Year 2025 Plus Project
- Opening Year 2025 Cumulative
- Opening Year 2025 Cumulative Plus Project

Based on the signal warrant analysis, Warrant 3 was met under all study scenarios for Locust Avenue at Casa Grande Drive. Traffic signal warrants were not met for Locust Avenue at West Coast Boulevard.

The CA MUTCD specifically states that, "The satisfaction of a traffic signal warrant or warrants shall not in itself require the installation of a traffic control signal." The reference document goes on to state a number of other factors to take into account when considering a signal for a specific location, including whether or not a signal would improve the overall safety of the intersection, whether it would benefit or disrupt progressive traffic flow (in this case, on Locust Avenue), and consideration of site-specific characteristics such as queueing, signal spacing, and overall delay to the main street through movements.

The decision to install a traffic signal should be based on engineering judgement, and not solely upon satisfying a single peak hour warrant. It is recommended that a decision about signalization at the intersection be based on future observations as well as engineering judgment, based on the factors listed above.

Based on the signal warrant analysis, a traffic signal and other associated signal improvements necessary to construct the traffic signal, is recommended at intersection #1 (Locust Avenue at Casa Grande Drive). The Project would pay a fair-share, based on future traffic growth, towards the recommended signal improvements benefitting intersection #1 (Locust Avenue at Casa Grande Drive).

No improvements are recommended at the intersection of Locust Avenue at West Coast Boulevard (#2) since a traffic signal warrant was not met under any analysis scenario due to the nominal amount of traffic on West Coast Boulevard. The level of service for an unsignalized intersection is based on the single approach movement with the highest delay, which in this case, would be the westbound approach for intersection #2. While the side street approach operates at a deficient level of service based on the highest delay approach, the overall intersection delay would be acceptable. Under Opening Year 2025 Cumulative Plus Project conditions, the westbound approach would have a 95th percentile queue of less than one car length in both the AM and PM peak hours. Therefore, any queuing that occurs on the side street would be contained on the minor intersection approach and would not impact the progression of traffic on the main arterial (i.e., Locust Avenue). It should be noted that the Project is required to construct the full
ultimate roadway width, consistent with industrial street standards, including curb and gutter, on both sides of West Coast Boulevard along the project site frontage, consistent with the existing West Coast Boulevard roadway section just east of the project site frontage. This improvement would provide one travel lane in each direction on West Coast Boulevard along the project site frontage and would improve overall circulation within the project site area, compared to existing conditions.

A summary of the intersection operation before and after implementation of a traffic signal and the fairshare are provided on Table 3.17-7 for informational purposes only. Fair-share calculations for intersection #1 (Locust Avenue at Casa Grande Drive) are provided on Table 3.17-8.

Table 3.17-7: Summary of Intersection Operation with Recommended Improvements									
	AM Peak Hour PM Peak Hour								
		Without Project With Project			Without	Nithout Project With Project		n Project	
Int. #	Intersection	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1	Locust Ave at Casa Grande Dr								
T	Traffic signal	51.4	F	39.3	D	161.2	F	38.3	D
Notes:									

- Bold values indicate intersections operating at an unacceptable Level of Service

- Delay values for unsignalized intersections represent the average vehicle delay on the worst (highest delay) intersection approach.

Table 3.17-8: Summary of Project Fair Share Improvements										
	AM Peak Hour				PM Peak Hour					
	Total	Volume				Total Volume				
Interaction	Evicting	Opening Year 2025 Cumulative Plus	Total	Project	Fair- Share	Evisting	Opening Year 2025 Cumulative Plus	Total	Project	Fair- Share
Intersection	Existing	Project	Growth	Trips	%-age	Existing	Project	Growth	mps	‰-age
#1 Locust Ave at Casa Grande Dr	1,055	1,219	164	20	12.2%	1,017	1,186	169	16	9.5%

Construction Traffic and Emergency Access. Construction of the proposed Project would add construction-related trips to and from the site during construction activities. These trips are associated with construction workers, grading, and construction of structures and site features.

Large construction equipment such as bulldozers, loaders, scrapers, and pavers would be required during various construction phases. Large equipment is generally brought to the site at the start of the construction phase and kept on site until its term of use ends. A staging area would be designated on-site to store construction equipment and supplies during construction.

Throughout construction, the size of the work crew reporting to the site each day would vary depending on the construction phase and the different activities taking place at the time. Parking for workers would be provided on the project site during all phases of construction. Construction workers would not be allowed to park on local streets. If needed during the peak construction periods, off-site parking would be provided.

The Applicant will be required to provide a CMP and identify planned travel patterns for haul vehicles. Approach and departure routes for construction vehicles would be via Locust Avenue and West Coast Boulevard. Trucks would typically arrive and depart via I-210, south of the project site.

Impacts from construction traffic would be limited to occasional and temporary delays to traffic during the movement of heavy equipment or transport of heavy loads to and from the site. The arrivals and departures of dirt-hauling trucks and other heavy trucks will be scheduled outside of the AM and PM peak hours. Construction management requirements, such as complying with peak hour restrictions, using flag men for short-term obstructions, and a formal traffic control plan for extended lane and street closures would be required.

The project site is in a developed area, and the proposed development would be accessed by roadways and driveways into the project site. The Project would have three points of access: two driveways on Locust Avenue and one driveway on West Coast Boulevard. The northern Locust Avenue driveway would be a full-movement truck driveway and would be 45 feet wide. The southern Locust Avenue driveway would be a full-movement passenger car and truck driveway and would be 46.8 feet wide. The driveway on West Coast Boulevard would be a full-movement passenger car driveway and would be 26 feet wide. All drive aisles would accommodate standard fire lane turning radiuses and hammerhead turnaround maneuvers for emergency and fire vehicles.

The Project would not introduce incompatible uses to area roadways. The Project would be designed in compliance with all applicable State and City building codes and would meet City of Rialto standards for design, including sight distance at all intersections. The Project would not introduce roadway hazards or incompatible uses. It would not increase transportation hazards in comparison to the Specific Plan. Constructed driveways are required to meet access standards of the Rialto Fire Department. Project traffic would not result in substantial delays and congestions that would affect the circulation of emergency vehicles in the study area.

The Project would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. However, the Project is subject to the City's citywide traffic impact fee program and the CMP.

Cumulative Impacts

As discussed above, the Project would not cause a transportation impact to occur, nor an increase in the severity of any cumulatively considerable transportation impacts previously disclosed in the Airport Specific Plan EIR, with implementation of the mitigation measures discussed in this section. Implementation of the Project would not cumulatively contribute to cumulative transportation impacts.

Mitigation Program

Mitigation Measures 5.2-2A, 5.2-3A, and 5.2-4 are not applicable to the Project because the Project is subject to the City's citywide traffic impact fee program and the Project's payment of impact fees will be used to offset the costs of implementing the mitigation measures. In addition, the Project may be required to construct a needed improvement in advance of the City's receipt of full funding, in which case the improvement may be subject to a reimbursement agreement, to allow the Project to recoup costs from future development. Mitigation Measure 5.2-1 is not applicable to the proposed Project because the City of Rialto complied with this mitigation measure prior to the approval of the Airport Specific Plan. Mitigation Measure 5.2-2B is not applicable to the Project because bus turn-outs and bus stops have been

constructed in the Airport Specific Plan EIR area. Mitigation Measures 5.2-2C and 5.2-2E are not applicable to the Project because the Project is not a commercial project; however, the Project would provide bicycle racks in accordance with current City requirements and MM AQ-10 in Section 3.3, *Air Quality*. Mitigation Measure 5.2-3B is not applicable to the Project because it is an action to be completed by the City of Rialto rather than an individual applicant.

Conclusion

Based on the comparative analysis set forth in this Addendum, no new impacts relative to transportation or an increase in the severity of a previously identified significant impact evaluated in the Airport Specific Plan EIR would occur. With regard to PRC Section 21166 and State CEQA Guidelines Section 15162(a), the Project would not result in any new impacts, or increase the severity of the previously identified impacts. There are no substantial changes to the circumstances under which the proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the Airport Specific Plan EIR. The Airport Specific Plan EIR concluded that the Airport Specific Plan would result in significant unavoidable impact with respect to the Airport Specific Plan's generation of more than 80 trips (the CMP Roadway threshold volume) along roadway segments serving CMP intersections within the cities of Fontana and San Bernardino, as well as the County of San Bernardino. Based on the Traffic Study prepared for the proposed Project, all transportation impacts can be mitigated to a less than significant level. Therefore, preparation of a subsequent environmental analysis is not warranted.

3.18 Utilities and Service Systems

- Threshold (a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm drainage, electrical power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?
- Threshold (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?
- Threshold (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?
- Threshold (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?
- Threshold (e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Summary of Impacts Identified in the Airport Specific Plan EIR

Water. The Airport Specific Plan area is within the service area of three water utilities: City of Rialto, West San Bernardino County Water District (WSBCWD), and the Fontana Water Company. Domestic water demand would be increased substantially as a result of Specific Plan implementation and would require the construction of domestic water transmission facilities to serve the Airport Specific Plan area; however, these system expansions would be added as necessary and would be paid for by user fees and, as appropriate, developer impact fees. Several mitigation measures, including Mitigation Measure 5.12-1 and 5.12-3, were identified to meet the daily water supply demand and City's maximum fire flow requirements. Impacts were considered less than significant with mitigation.

Sewer. The Airport Specific Plan area is served by the sanitary sewer system of the City of Rialto. Wastewater is currently treated at the existing City of Rialto wastewater treatment plant, near the intersection of Acacia Avenue and Santa Ana Avenue. Specific Plan implementation would require upsizing of existing facilities to serve the area. The Airport Specific Plan EIR determined that implementation of the Airport Specific Plan would result in significant amounts of wastewater, requiring additional facilities. Mitigation measures, including Mitigation Measure 5.12-1and 5.12-3, were identified to reduce impacts to sewer facilities, although sewage generation would occur incrementally as projects are developed in the Specific Plan area. Impacts were considered less than significant with mitigation.

Electrical/Natural Gas/Telecommunications. Electricity is provided to the Airport Specific Plan area by Southern California Edison (SCE) and natural gas is supplied by the Southern California Gas Company (SoCal Gas). Telephone service was provided by Pacific Bell Company. Airport Specific Plan implementation would require expansion of existing electrical, natural gas, and telecommunication facilities. The Airport Specific Plan EIR determined that implementation of the Airport Specific Plan would create additional demand for electricity, natural gas, and telephone service facilities related to the development of the proposed land uses. Several mitigation measures, including Mitigation Measure 5.12-6, were identified to reduce impacts to utility services and infrastructure.

Solid Waste. The Airport Specific Plan EIR determined that implementation of the Airport Specific Plan would result in the generation of significant amounts of solid waste. However, impacts on existing solid waste facilities from Specific Plan land use solid waste would be reduced to a less than significant level with mitigation including compliance with the California Integrated Waste Management Act of 1989 (Mitigation Measure 5.12-5A), review of site plans identifying proposed solid waste and recyclable collection areas (Mitigation Measure 5.12-B), and the use of landscape treatments that minimize yard trimmings and waste (Mitigation Measure 5.12-5C).

Project-Specific Analysis and Significance Determination: No new impact; no substantial change from previous analysis.

The land use designation for the project site in the Airport Specific Plan is Planned Industrial Development (I-PID). Warehouses are a permitted use in the I-PID.

Water. The project site is in the service area of the WVWD.³³ As it applies to the Project, the West Valley Water District 2020 Regional Urban Water Management Plan (RUWMP), as part of the San Bernardino Valley Municipal Water District (SBVMWD) 2020 Upper Santa Ana River Watershed IRUWMP, is the applicable planning document for evaluating water supply and demand. According to the RUWMP, WVWD's 2020 water supply was approximately 20,098 acre-feet (AF), which was a combination of 11,401 AF of groundwater, 5,356 AF of surface water, and 3,342 AF of purchased or imported water. **Table 3.18-1: WVWD Projected Water Supplies** shows the forecasted water supply for the WVWD service area through 2045.

Table 3.18-1: WVWD Projected Water Supplies (AFY)									
Water Supply	Additional Detail	2025	2030	2035	2040	2045			
Groundwater ¹	Bunker Hill (part of SBB)	2,052	2,353	3,554	4,754	6,455			
Groundwater ¹	Bunker Hill (part of SBB, via Baseline Feeder)	5,000	5,000	5,000	5,000	5,000			
Groundwater 1	Lytle (part of SBB)	2,900	2,900	2,900	2,900	2,900			
Groundwater ¹	Rialto-Colton	4,426	4,538	4,650	4,761	4,873			
Purchased or Imported Water	State Water Project – Rialto Colton Groundwater Supplemental Supply	-	-	-	-	-			
Groundwater ¹	Riverside-Arlington	2,500	3,000	3,500	4,000	4,000			
Groundwater ¹	Chino	-	900	900	900	900			
Surface water (not desalinated)	Lytle Creek	3,100	3,100	3,100	3,100	3,100			
Purchased or Imported Water	State Water Project – Direct Delivery	7,000	7,000	7,000	7,000	7,000			
Total	_	26,978	28,791	30,603	32,415	34,229			
AFY = acre-feet per year; Source: WVWD, 2021. 1. Not desalinated Source: WVWD, 2021.									

The 2020 Upper Santa Ana River Watershed IRUWMP provides water demand projections for the City, as shown in **Table 3.18-2: WVWD Water Supply and Demand Comparison.** The IRUWMP determined that the water supply would be able to accommodate the service area's normal years, single dry years, and

³³ West Valley Water District. (2016). West Valley Water District Boundary Map. https://www.yourrialto.com/DocumentCenter/View/1207/Map-of-West-Valley-Water-District-Boundaries.

multiple-dry years, if required. Additionally, the Project would include the construction and operation of an industrial warehouse and distribution development on land zoned for industrial uses. Therefore, the Project's water demand has been accounted for within the General Plan and Project implementation would not result in significant impacts to the City's available water supply.

Table 3.18-2: Projected Water Demand (AF)								
Customer Class	2025	2030	2035	2040	2045			
Residential	6,528	6,945	7,362	7,629	7,897			
Commercial	1,577	1,678	1,779	1,843	1,908			
Institutional/Government 776 826 876 907 939								
AF = acre-feet Note: The IRUWMP characterizes by three categories. The Project would fall under the commercial category.								

Note: The IRUWMP characterizes by three categories. The Project would fall under the commercial categories. Source: IRUWMP, 2021.

Sewer. The Project is an industrial warehouse and distribution development within land zoned I-PID. As such, the proposed development is consistent with the assumptions in the Airport Specific Plan for the project site. Assuming the City's wastewater generation factors of 1,000 gallons per acre for commercial land uses from the 1994 Rialto Storm Drain and Wastewater Master Plan, the Project would generate 11,220 gallons per day (gpd).

Wastewater collected by the City would be treated at the Rialto Wastewater Treatment Plant, which functions in conjunction with four additional independent treatment plants. The combined total treatment design capacity of the plants is over 12 million gallons per day (mgd)³⁴. Given that the Project would generate an additional 11,220 gpd or 0.011 mgd of wastewater based on these generation rates, this increase is nominal compared to the combined residual capacity of the treatment plants. Therefore, existing wastewater treatment facilities would accommodate the project-generated wastewater and continue to maintain a substantial amount of remaining capacity for future wastewater treatment. The Project includes a new sewer connection. The Project would design the sewer connection consistent with current City design guidelines and would pay a sewer connection fee.

Development of the proposed Project would not substantially alter the existing drainage patterns of the project site. The proposed condition would mimic the existing drainage pattern with the development of the warehouse, surface parking areas, and associated on-site improvements. Pursuant to Municipal Code Section 12.60.260, Stormwater Quality Management Plan (SWQMP), the Project would be required to submit and have the City Engineer approve a SWQMP. The SWQMP would identify all BMPs that would be incorporated into the Project to control storm water and non-storm water pollutants during and after construction and would be revised as necessary during the life of the Project. BMPs would be designed in accordance with the NPDES requirements. Therefore, storm water runoff expected at buildout of the Project would not exceed existing storm drainage capacities. Impacts would be less than significant, and there are no changes or new significant information that would require preparation of subsequent CEQA documentation.

Electrical/Natural Gas/Telecommunications. The Project would not require relocation or construction of new backbone infrastructure facilities. The Project would connect to existing connections for services.

³⁴ City of Rialto. (2010). *Rialto General Plan.* https://www.yourrialto.com/DocumentCenter/View/1494/2010-General-Plan.

Additionally, the Project would include the undergrounding of existing overhead utilities located along the project site frontage along West Coast Boulevard.

Solid Waste. Implementation of the Project would be expected to generate additional waste during the temporary, short-term construction phase, as well as the operational phase, but it would not result in inadequate landfill capacity. Waste generation may vary greatly depending upon individual tenants; however, the Project does not propose a land use change; therefore, the uses allowed to operate on the project site would be consistent with the assumptions for solid waste in the Airport Specific Plan EIR. The City of Rialto's Waste Management Office provides environmental services to City residents and businesses. The Waste Management Office oversees the City's trash and recycling service contract provided by Burrtec Disposal. Solid waste service for the City of Rialto is provided by the Mid-Valley Sanitary Landfill located in the northern portion of the City. The landfill has a maximum throughput of 7,500 tons per day. This landfill has a maximum permitted capacity of approximately 101.3 million cubic yards, and the landfill has a remaining capacity of approximately 61.2 million cubic yards.³⁵ The landfill has an expected operational life through 2045 with the potential for vertical or downward expansion.³⁶

Landfill capacity is expected to decrease over time with future growth and development throughout San Bernardino County and surrounding Inland Empire areas. Waste reduction and recycling programs and regulations are expected to reduce this demand and extend the life of existing landfills. The Project complies with the land use and zoning designations set forth in the Airport Specific Plan for the project site. Impacts would be less than significant, and there are no changes or new significant information that would require preparation of subsequent CEQA documentation.

The Project would be required to adhere to City ordinances with respect to waste reduction and recycling, as detailed in Municipal Code Chapter 8.08, Refuse Collection. The Project's solid waste generation would be subject to compliance with AB 939, which measures for each jurisdiction, in part, the actual disposal amounts compared to target disposal amounts. Further, the Project, similar to all projects, is required to recycle construction waste in compliance with AB 341, and to handle green waste in accordance with AB 1826. Overall, impacts would be less than significant and there are no changes or new significant information associated with the Project.

Cumulative Impact

Given the existing available water supply, the water supply needs of the Project—together with related projects—would not result in the need for new or expanded water entitlements that could result in significant environmental impacts. Since the Project would not have a significant impact on the water supply and would have adequate water infrastructure improvements, the Project combined with related projects would not result in significant water supply and infrastructure impacts. Therefore, the Project would not require or result in the relocation or construction of new or expanded water facilities. Further, the Project would have sufficient water supplies to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years. No significant cumulative impact is anticipated with respect to water supply, and the Project's contribution is not considered cumulatively considerable.

³⁵ CalRecycle. (2023). *SWIS Facility/Site Activity Details*. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1880?siteID=2662. Accessed November 15, 2023.

³⁶ City of Rialto. (2017). Addendum to the Renaissance Specific Plan Final Environmental Impact Report.

Given the existing available capacity of the water treatment plant, the wastewater treatment needs of the Project—together with related projects—would not result in the need for new or expanded wastewater treatment facilities that could result in significant environmental impacts or that could cause the wastewater treatment to exceed the capacity of the wastewater treatment facilities. The City indicated that sufficient capacity exists for sewer services for the Project. Therefore, the Project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities. Further, the Project would have adequate wastewater capacity to serve the Project and reasonably foreseeable future development. No significant cumulative impact is anticipated with respect to wastewater capacity, and the Project's contribution is not cumulatively considerable.

As addressed in Section 3.6, *Energy*, the Project would not cause an energy impact to occur, including the use of electricity. Implementation of the Project would not result in significant unavoidable energy impacts and would therefore not result in a new or substantially more severe project-specific or cumulative energy impact than those already analyzed. The Project's contribution to energy use would less than cumulatively considerable.

Potential future projects in the area would increase solid waste generation and decrease available capacity of the County's landfills. The Project does not propose a change to land use or zoning; thus, the solid waste generation for construction and operations of industrial uses on the site were assumed in planning documents. The Project would not result in a significant impact and combined with related projects would not result in significant impacts to solid waste standards, infrastructure, or reduction goals. Therefore, the Project's contribution would not be cumulative considerable.

In summary, the Project would not cause utility impacts to occur, nor an increase in the severity of any utilities impacts previously disclosed in the Airport Specific Plan EIR. The Project's contribution would be less than cumulatively considerable.

Mitigation Program

Mitigation Measures 5.12-1, 5.12-3, 5.12-5A, 5.12-5B, 5.12-5C, and 5.12-6 from the Airport Specific Plan EIR are applicable to the Project. Mitigation Measure 5.12-2 from the Airport Specific Plan EIR is not applicable to the Project because the Project does not require the approval of a subdivision map.

MM 5.12-1 Prior to the issuance of building permits, project developers shall demonstrate the use of low water use fixtures, plumbing fixtures and appliances, to the satisfaction of the City Building Inspector, as follows:

Interior:

- Supply line pressure: Reduce water pressure greater than 50 psi to 50 psi or less by means of a pressure-reducing valve.
- Drinking fountains: Equip drinking fountains with self-closing valves.
- Ultra-low toilets: Install 1.ft gallon per flush toilets in all new construction.

Exterior:

- Landscape with low water-consuming plants wherever feasible.
- Minimize use of lawn by limiting it to lawn-dependent uses.
- Group plants of similar water use to reduce over irrigation of low- water-using plants.

- Use mulch extensively in all landscaped areas. Mulch applied on top of soil will improve the water-holding capacity of the soil by reducing evaporation and soil compaction.
- Preserve and protect existing trees and shrubs. Established plants are often adapted to low-water-using conditions and their use saves water needed to establish replacement vegetation.
- Install efficient irrigation systems which minimize runoff and evaporation and maximize the water which will reach the plant roots. Drip irrigation, soil moisture sensors, and automatic irrigation systems are a few methods to consider in increasing irrigation efficiency and may be feasible for the project.
- Use pervious paving material whenever feasible to reduce surface water runoff.
- investigate the feasibility of utilizing reclaimed wastewater, stored rain water, or gray water for irrigation.
- **MM 5.12-3** Project developers shall pay applicable connection fees prior to issuance of connection permits and shall provide appropriate facilities on-site to connect with the City's system.
- MM 5.12-5A Prior to issuance of occupancy permits, the project applicant shall provide the City and County with evidence of compliance with guidelines set forth by the State of California in accordance with the California Integrated Waste Management Act of 1989 (AB 989) which requires jurisdictions to divert 50 percent of solid waste from landfills by the year 2000. This shall include consideration for relocating mature trees, and offering marketable materials to recyclers such as concrete, asphalt and steel.
- MM 5.12-5B Prior to the issuance of any building permits, a site plan delineating the capacity, number, and location of all proposed solid waste and recyclable collection areas shall be submitted to the City of Rialto Department of Public Works for review and approval. Further, each location shall be verified by the City of Rialto Development Services Department, prior to issuance of any certificates of use and occupancy.
- **MM 5.12-5C** The applicant shall utilize special landscape treatments to minimize the amount of yard trimmings and waste from the proposed project area, to the satisfaction of the City Development Services Department, as part of the Precise Plan of Development review and approval.
- **MM 5.12-6** All construction shall be done within the guidelines established by State building regulations and the Uniform Building Code (UBC) as they relate to energy conservation including such measures as solar heating for water and the use of landscaping to shade buildings.

Conclusion

Based on the comparative analysis set forth in this Addendum, no new impacts relative to Utilities and Services or a substantial increase in the severity of a previously identified significant impact evaluated in the Airport Specific Plan EIR would occur. With regard to PRC Section 21166 and State CEQA Guidelines Section 15162(a), the Project would not result in any new impacts, or increase the severity of the previously identified impacts. There are no substantial changes to the circumstances under which the Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the Airport Specific Plan EIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the Airport Specific Plan EIR was certified is available that would impact the prior finding of less than significant. Therefore, preparation of a subsequent environmental analysis is not warranted.

3.19 Wildfire

The topic of Wildfire was not addressed in the Airport Specific Plan EIR because the requirement to analyze in CEQA documents, the potential impacts associated with proximity to very high fire hazard severity zones did not become effective until January 1, 2019, which was subsequent to the certification of the Airport Specific Area EIR by the Rialto City Council in November 1997.

- Threshold (a) If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?
- Threshold (b) If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project, 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?
- Threshold (c) If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, 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?
- Threshold (d) If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, 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 the CALFIRE Fire Hazard Severity Zone Viewer, the project site is not within or proximate to Very High Fire Hazard Severity Zone (VHFHSZ) zone for a Local Responsibility Area (LRA). Additionally, the project site is not within areas designated as High or Moderate fire susceptibility³⁷. Therefore, this threshold is not applicable to the Project. No impact would occur and no mitigation is required.

Cumulative Impact

As discussed above, the project site is not within a VHFHSZ. Therefore, the Project would not cause either a new cumulative impact to occur or cumulatively contribute to wildfire impacts.

Mitigation Program

No mitigation measures are required.

Conclusion

As discussed above, the Project would not cause a new wildfire impact. Additionally, no new information of substantial importance that was not known and could not have been known at the time the Airport Specific Plan EIR was certified is available that would result in a significant impact that would require major revisions to the Airport Specific Plan EIR. Therefore, preparation of a subsequent environmental analysis is not warranted.

³⁷ California Department of Forestry and Fire Protection (CAL FIRE). (2023). Fire Hazard Severity Zones in State Responsibility Areas. Fire and Resource Assessment Program. https://egis.fire.ca.gov/FHSZ/. Accessed March 2023.

4 DETERMINATION OF APPROPRIATE CEQA DOCUMENTATION

Based upon the analysis of potential environmental consequences anticipated to occur from implementation of the proposed Project as provided in Section 3, *Evaluation of Environmental Impacts*, the proposed Project would not result in any new or more severe impacts that were not disclosed, analyzed, and mitigated for in the Airport Specific Plan EIR. As demonstrated in this Addendum, the proposed Project's potential impacts would either be the same or less than those anticipated for the approved project as evaluated in the Airport Specific Plan EIR. In addition, there are no substantial changes to the circumstances under which the proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the Airport Specific Plan EIR, nor has any new information regarding the potential for new or more severe significant environmental impacts been identified.

Therefore, in accordance with State CEQA Guidelines Section 15164, this Addendum to the previously certified Airport Specific Plan EIR is the appropriate environmental documentation for the proposed Project. In taking action on any of the approvals, the decision-making body must consider the whole of the data presented in the Airport Specific Plan EIR, as augmented by this Addendum. Therefore, preparation of a subsequent EIR is not required and the appropriate CEQA document for the proposed Project is this Addendum to the Airport Specific Plan EIR. No additional environmental analysis or review is required for the proposed Project.

Section 15162 – Subsequent EIRs and Negative Declarations

- (a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following:
 - (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

The land use designation for the project site in the Airport Specific Plan is Planned Industrial Development (I-PID). Warehouses are a permitted use in the I-PID. The Airport Specific Plan assumed a maximum FAR of 0.7:1 for planned industrial development. The total area of the project site is 488,624 sf, which at a 0.7:1 FAR would result in a maximum allowable building size of 342,037 sf. The proposed Project would allow for a 225,173-sf warehouse and distribution facility on the 11.21-acre project site and would include 215,173 sf of warehouse space and 10,000 sf of ancillary office space.

The City of Rialto proposes to implement the Project within the context of the Airport Specific Plan, as described in this Addendum. As discussed in the Environmental Impact Analysis section of this Addendum, no new or more severe significant environmental effects beyond what was evaluated in the Airport Specific Plan EIR would occur that would require substantive revisions to the Airport Specific Plan EIR. The proposed Project would not result in increased impacts above what was evaluated in the Airport Specific Plan EIR with regard to environmental factors such as air quality, noise, public services, and utilities.

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or As documented herein, subsequent to the implementation and certification of the Airport Specific Plan, the Rialto City Council adopted resolutions declaring the intent to relocate the Rialto Airport operations to other nearby facilities. With the closure of the Rialto Airport, many of the assumptions for development in the Airport Specific Plan area were no longer applicable. On November 9, 2010, the Rialto City Council adopted the Renaissance Specific Plan and certified the Renaissance Specific Plan Program EIR. The approximately 1,439-acre Renaissance Specific Plan area is generally bordered by Casmalia Street to the north, Baseline Road to the south, Ayala Drive to the east, and Tamarind Avenue to the west. With the adoption of the Renaissance Specific Plan area.

Although the boundaries of the Airport Specific Plan were modified, the remainder of the Airport Specific Plan, located primarily north of SR-210, continues to regulate the areas within the remaining Airport Specific Plan area, outside of the Renaissance Specific Plan area. The Airport Specific Plan identified this area as (1) an industrial area, (2) largely "underutilized and underdeveloped", (3) intended to "encourage and improve the economic and physical vitality of the area", (4) providing for "development standards and design guidelines ... to ensure a quality appearance within the area".

Accordingly, this change in circumstances does not result in new or substantially more severe significant environmental effects than previously identified. As discussed in the Environmental Impact Analysis section of this Addendum, no substantial changes have occurred with respect to the circumstances under which the Project will be undertaken which will require major revisions of the Airport Specific Plan EIR due to new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant environmental effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

No new information that was not known at the time the Airport Specific Plan EIR was prepared is now available that demonstrates that the proposed Project will result in a new or increased impact. Based on the analysis prepared for the proposed Project, the project-related effects would not be substantially more severe than were disclosed in the Airport Specific Plan EIR as a result of the proposed Project. Implementation of the proposed Project within the context of the Airport Specific Plan would not substantially increase the severity of previously identified impacts.

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

No mitigation measures or alternatives were found infeasible in the Airport Specific Plan EIR.

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the

environment, but the project proponents decline to adopt the mitigation measure or alternative.

No feasible alternatives have been identified that would substantially reduce significant impacts associated with the buildout the Airport Specific Plan. However, the proposed Project would not result in any significant unavoidable impacts.

(b) If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision (a). Otherwise the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.

Additional technical analyses were performed for the proposed Project and are the subject of this Addendum. Based on the analysis in this document, the proposed Project would not result in any new significant environmental effects that are substantially different from those identified in the Airport Specific Plan EIR nor would it substantially increase the severity of significant effects previously identified in the Airport Specific Plan EIR. None of the conditions listed under subsection (a) would occur that would require preparation of a subsequent EIR.

(c) Once a project has been approved, the lead agency's role in project approval is completed, unless further discretionary approval on that project is required. Information appearing after an approval does not require reopening of that approval. If after the project is approved, any of the conditions described in subdivision (a) occurs, a subsequent EIR or negative declaration shall only be prepared by the public agency which grants the next discretionary approval for the project, if any. In this situation no other responsible agency shall grant an approval for the project until the subsequent EIR has been certified or subsequent negative declaration adopted.

None of the conditions listed in subsection (a) would occur as a result of the proposed Project. Therefore, no subsequent EIR is required.

Section 15164 – Addendum to an EIR or Negative Declaration

(a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

As described above, none of the conditions described in the State CEQA Guidelines Section 15162 calling for the preparation of a subsequent EIR have occurred.

(b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

None of the conditions described in Section 15162 calling for preparation of a subsequent EIR would occur as a result of the proposed Project. Therefore, an Addendum to the Airport Specific Plan EIR is the appropriate CEQA document for the proposed Project.

(c) An addendum need not be circulated for public review but can be included in or attached to the EIR or adopted negative declaration.

This Addendum will be attached to the Rialto Airport Specific Plan EIR and maintained in the administrative record files at the City of Rialto.

(d) The decision making body shall consider the addendum with the EIR or adopted negative declaration prior to making a decision on the project.

The City of Rialto would consider this Addendum with the Rialto Airport Specific Plan EIR prior to making a decision on the proposed Project.

(e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

This document provides substantial evidence for City of Rialto records to support the preparation of this Addendum for the proposed Project.

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