

RSPA RENAISSANCE PHASE II

ADDENDUM TO THE RENAISSANCE SPECIFIC PLAN AMENDMENT 2016 FINAL ENVIRONMENTAL IMPACT REPORT

STATE CLEARINGHOUSE #2006071021

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1 PURPOSE OF THE ADDENDUM

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 (City).

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 Environmental Impact Report (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.” Pursuant to Section 15162(a) of the State CEQA Guidelines, a subsequent EIR or Negative Declaration is only required when:

- (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;
- (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.

The Renaissance Specific Plan (2010 RSP) established a framework for future development and land use decisions for an area of approximately 1,445.3 gross acres and was approved by the City on November 23, 2010. The 2010 RSP included a total of approximately 16.2 million square feet (sf) of business and commercial uses, 1,667 residential units, one (1) school, one (1) community park, and multiple neighborhood parks. Potential environmental impacts for the 2010 RSP were evaluated in the Renaissance Specific Plan Final Environmental Impact Report (2010 RSP Final EIR) (State Clearinghouse [SCH] No. 2006071021), prepared by the City, acting as the Lead Agency, in accordance with CEQA and the State CEQA Guidelines.

The Renaissance Specific Plan Amendment (2016 RSPA) area is 1,450.7 gross acres located within the northwestern portion of the City. It is planned as an integrated community of varied housing types located near, and linked to, places of employment, retail uses, services, and schools. The 2016 RSPA includes 104.5

acres of residential uses; 935.1 acres of nonresidential uses including retail, commercial office and industrial uses; a school; a community park; and multiple neighborhood parks proximate to one another and organized in a grid pattern. Required infrastructure improvements were identified in the 2016 RSPA and their potential environmental impacts were evaluated as a part of the 2016 RSPA project in the Final Recirculated Subsequent Environmental Impact Report (2016 RSPA Final SEIR) (State Clearinghouse [SCH] No. 2006071021). The 2016 RSPA Final SEIR was certified and the RSPA was approved by the City Council on December 13, 2016.

The Project applicant is currently proposing the development of 292 residential dwelling units and a 2.2-acre private recreation area on an approximately 25.37-acre project site within the boundaries of the 2016 RSPA area. The project site is located south of State Route 210 (SR-210) and the Renaissance Marketplace Shopping Center, and east of Linden Avenue. The project site is comprised of Planning Areas 113, 117, and portions of 110, 111, and 129, within the 2016 RSPA area.

Regional access to the project site is provided primarily by SR-210, located approximately 0.2 miles to the north of the project site. In addition, Interstate 215 (I-215) is located approximately 5.4 miles to the east of the project site; Interstate 15 (I-15) Freeway is approximately 5.7 miles to the west of the project site, and access to Interstate 10 (I-10) is approximately 4.2 miles to the south of the project site. Vehicular access to residential areas within the project site would consist of a series of collector and local streets providing access to the residential neighborhoods.

The purpose of this Addendum is to analyze potential differences between the impacts identified in the 2016 RSPA Final SEIR and those that would be associated with the proposed Project. Pursuant to provisions of CEQA and State CEQA Guidelines, the City is the Lead Agency charged with the responsibility of deciding whether to approve development on the project site. As part of its decision-making process, the City is required to review and consider whether the proposed Project would create new significant impacts or significant impacts that would be substantially more severe than those disclosed in the 2016 RSPA Final SEIR. Additional CEQA review, beyond this Addendum, would only be prompted if the proposed Project created new significant impacts, or if impacts are more severe than those disclosed in the 2016 RSPA Final SEIR (CEQA Document to approve the RSPA project in 2016). To use an Addendum as the appropriate CEQA document for the proposed Project, the City must find that major revisions to the 2016 RSPA Final SEIR are not necessary and that none of the conditions described in State CEQA Guidelines Section 15162 calling for the preparation of additional CEQA documentation has occurred.

As detailed herein, the proposed Project would result in no new significant impacts that were not analyzed in the 2016 RSPA Final SEIR, nor would the proposed Project cause a substantial increase in the severity of any previously identified environmental impacts. The potential impacts associated with proposed Project would either be the same or less than those described in the 2016 RSPA Final SEIR. 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 2016 RSPA Final SEIR, nor has any new information regarding the potential for new or more severe significant environmental impacts been identified. Therefore, in accordance with Section 15164 of the State CEQA Guidelines, this Addendum to the previously certified 2016 RSPA Final SEIR is the appropriate environmental documentation for the proposed Project. In taking action on the approvals, the decision-making body must consider the whole of the data presented in the 2016 RSPA Final SEIR and the previously adopted Mitigation Monitoring and Reporting Program (MMRP), as augmented by this Addendum.

2 DESCRIPTION OF PROPOSED PROJECT

2.1 Project Setting and Location

The project site is located within the northwestern area of the City of Rialto in San Bernardino County and is generally bound by the Renaissance Marketplace Shopping Center to the north; vacant, undeveloped land to the south, residential development under construction to the east; and Linden Avenue to the west, with industrial uses further west of Linden Avenue. This Addendum to the 2016 Renaissance Specific Plan Amendment Final Recirculated Subsequent EIR (2016 RSPA Final SEIR) and the associated technical studies evaluate the potential impacts associated with the development of up to 292 residential dwelling units and an approximately 2.2-acre private recreation area. **Figure 1: Regional Location Map**, and **Figure 2: Project Vicinity Map**, depict the project site in a regional and local context, respectively.

The project site is within the boundary of the 2016 RSPA. The 2016 RSPA increased the business and commercial uses from 9.3 million square feet in the 2010 RSP, to 10.7 million square feet, and decreased the residential uses from 1,667 units (149.5 acres) to 1,262 units (104.5 acres). The project site is comprised of Planning Areas 113, 117, and portions of 110, 111, and 129, within the 2016 RSPA area. The 2016 RSPA FEIR analyzed 398 units on the project site. The project site consists of approximately 25.37 acres located on Assessor Parcel Numbers (APN) 0264-153-02, 0264-211-07, 0264-211-08, 0264-211-09, 0264-211-10, 0264-212-07, and 0264-212-08 which includes the proposed private recreation area and the proposed residential development. With off-site improvements and construction staging area, the total construction footprint would be approximately 39.6 acres.

The property is relatively flat and is located on the USGS 7.5-Minute Topographic Map of the Devore, California Quadrangle. Elevation of the project site ranges from approximately 1,440 feet above mean sea level (amsl) at the northeast corner of the project site to 1,420 feet amsl at the southeast corner of the project site. The project site consists of vacant, previously disturbed land including ruderal vegetation and portions of pavement and gravel cover that remain from runways and other infrastructure related to the airport that was previously located on the project site. The northern boundary of the project site is bounded by a block wall. Existing land use designations for each planning area are described in Error! Reference source not found., below.

Planning Area	Land Use Category	Maximum Allowed Dwelling Unit/Acre
129	Slope/Buffer	--
117	Private Recreation Center	--
113	Low Density Residential (LDR)	8
111	Slope/Buffer	--
110	Medium High Density Residential	16

2.2 Project Characteristics

Lewis-Hillwood Rialto Company, LLC. (Applicant) is currently proposing up to 292 residential dwelling units and a private recreation area for future residents on an approximately 25.37-acre project site, as shown in **Figure 3: Conceptual Site Plan**, **Figure 4: Conceptual Landscape Plan**, and **Figure 5: Renaissance Specific Plan Amendment Area**. The 2016 RSPA Final SEIR analyzed the maximum permitted density and assumed a total of 398 dwelling units for the project site, as shown in **Table 2: 2016 RSPA Residential Land Use Summary for Project Site**. The Project would be comprised of a mix of detached and semi-detached single-family residences ranging from approximately 1,436 sf to 1,841 sf. The Project would require 715 parking spaces and would provide 751 parking spaces including assigned, guest, and recreation center parking. The proposed Project is identified by the City as Master Case Number 2024-0028 and would require discretionary approval from the City for a Tentative Tract Map (TTM 2024-0002) and a Precise Plan of Design (PPD 2024-0024) for the project site.

Planning Area	Housing Type	Zoning	Dwelling Units Analyzed 2016
Portion of 129	-	Slope/Buffer	-
117	-	Private Recreation Center	-
113	Single Family	Low Density Residential (LDR)	212
Portion of 111	-	Slope/Buffer	-
Portion of 110	Single Family	Medium High Density Residential (MDHR)	186
Total:			398

As described in the 2016 RSPA, the 2016 RSPA planning area was anticipated to build out over several years and under different owners. Thus, modifications to the land were expected in order to respond to changes in roadway alignments, right-of-way widths, physical realities, density transfers, and new product types.¹ As shown in Error! Reference source not found., the proposed Project includes development proposed across portions of several planning areas with varied allowable dwelling units and dwelling units per acre. Accordingly, the proposed Project includes changes to roadway alignments and housing types with varied densities that overlap the 2016 RSPA planning area boundaries. However, the project site is comprised of planning areas designated for residential uses. Further, the proposed Project would have a net density of 11.9 dwelling units per acre (du/ac) and 292 dwelling units, which conforms with the analysis of allowable density assumed in the 2016 RSPA for the planning areas included in the proposed Project.

As shown in **Figure 4: Conceptual Landscape Plan**, the Project would include landscaping throughout the project site. Landscaping would be included along proposed sidewalks and roadways, between the proposed residential units, within the proposed private recreation area, and along the Project boundaries. Landscaping would be used to accentuate the proposed driveways. Landscaping would include a variety of trees, shrubs, and groundcover. Low water, drought tolerant plants, vines and groundcovers are proposed to provide a low maintenance, water efficient landscape pursuant to the 2016 RSPA Residential Development Standards. A 19-foot landscape easement would be included along the Project frontage on Linden Avenue and a 30-foot landscape buffer would be included along the northern boundary of the

¹ City of Rialto. (2016). Renaissance Specific Plan Amendment.

project site. The landscape buffer would screen the proposed residential use from the non-residential uses to the north of the project site.

2.3 Site Access

Primary access to the project site would be provided via two full-movement driveways on Linden Avenue. Secondary vehicular access to the project site would be provided by driveways from the adjacent approved residential development to the east, including one proposed full-access driveway on Ayala Drive and one exit-only driveway on Ayala Drive. Entrances to the private recreation center would be gated to provide private access to future residents.

2.3.1 Infrastructure and Off-Site Improvements

Consistent with the assumptions set forth in the 2016 RSPA Final SEIR, development of the project site would be served via water, sewer, and power extensions, as available, to the project site from existing lines in Linden Avenue. The Project would connect to existing 12-inch water pipeline and 10-inch sewer pipeline located within Linden Avenue. The Project would include the installation of 8-inch water pipelines and 8-inch and 6-inch sewer pipelines within the project site.

Off-site improvements would include the widening of the parkway located within Linden Avenue to include the proposed 12-foot wide meandering trail included in the 30-foot landscape setback, as identified in the 2016 RSPA.

2.4 Construction Schedule

Construction activities associated with the Project are estimated to be completed within approximately 28 months. Construction would include the following phases: site preparation, grading, infrastructure improvements, paving, building construction, and architectural coating. Total grading for the proposed Project is estimated to require approximately 53,000 cubic yard (cy) of cut and 50,300 cy of fill; however, earthwork will be managed to balance on-site through development, including the installation of underground utilities, walls and paving.

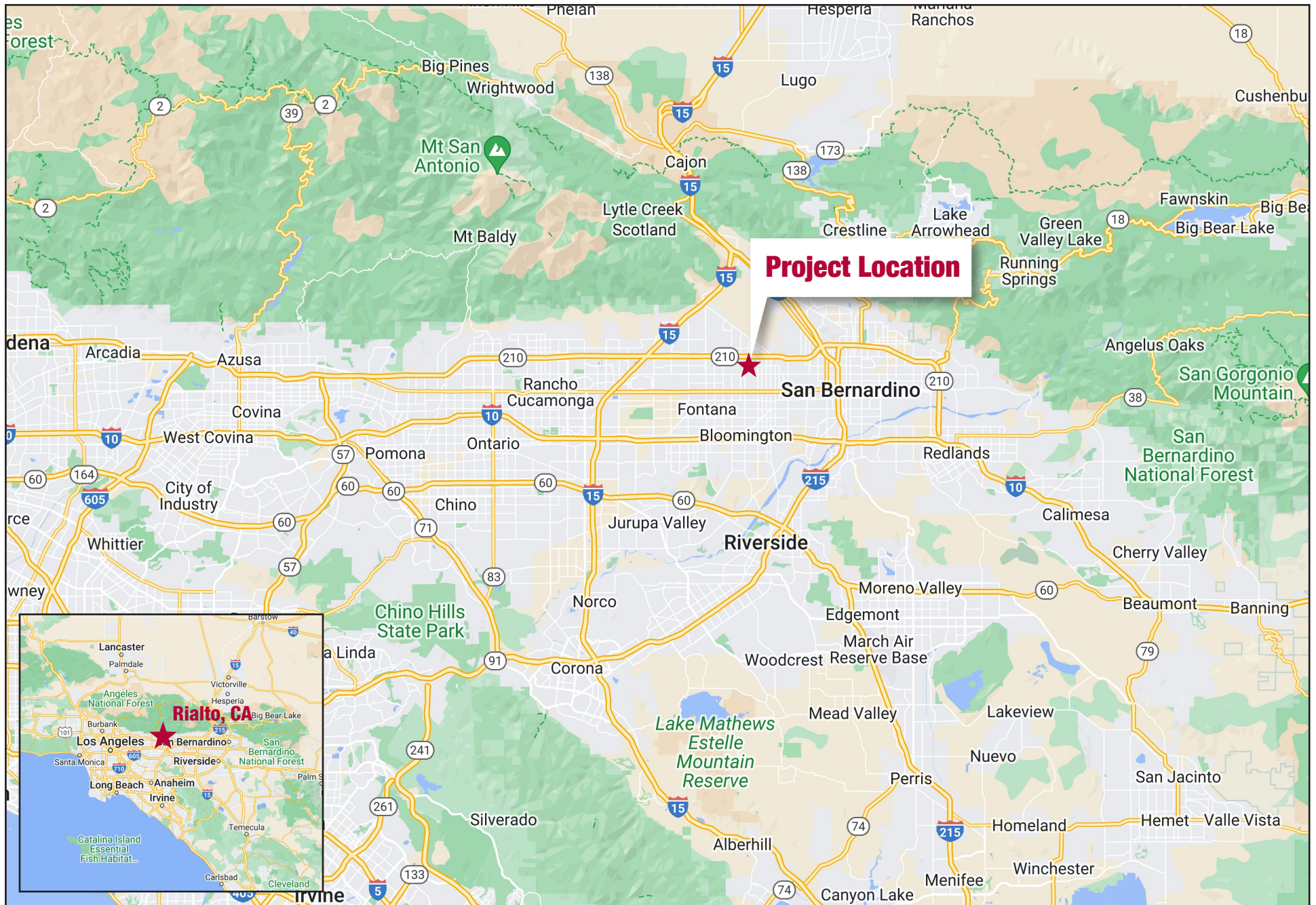
2.5 Project Approvals

The City of Rialto is the Lead Agency as set forth in CEQA Section 21067 and is responsible for reviewing and approving the Addendum to the Renaissance Specific Plan Amendment Final SEIR. The City will consider the following discretionary approvals for the Project:

- Tentative Parcel Map
- Precise Plan of Design (PPD)

The PPD package is comprised of the following components: site plan, floor plan, roof plan, elevation plan, conceptual grading plan, Water Quality Management Plan, color elevations, color and materials board, and conceptual landscape plan.

Additional permits may be required upon review of construction documents. Other permits required for the Project may include but are not limited to the issuance of encroachment permits for driveways, sidewalks, and utilities; security and parking area lighting; demolition permits; building permits; grading permits; and permits for new utility connections.



Source: Google Maps, 2022

FIGURE 1: Regional Location Map
Renaissance Phase II Project



Source: NearMap

FIGURE 2: Project Vicinity Map

Renaissance Phase II Project



30-foot landscape buffer on northern boundary

19-foot landscape easement along Linden Avenue

PLANT PALETTE:

TREES & VINES

	MULTI-TRUNK SPECIMEN TREE		Live Oak		Flowering Accent Tree
	LARGE DECIDUOUS CANOPY TREE		California Sycamore		UPRIGHT EVERGREEN CANOPY TREE
	INTERIOR STREET TREES		Sweetshade Tree		EVERGREEN COLUMNAR TREE
	UPRIGHT MOTOR COURT CANOPY TREE		Pine Tree		STREET TREES (LINDEN STREET)

SHRUBS AND GROUNDCOVER

	TALL EVERGREEN UPRIGHT		Ilex Blue Yellow-wood
	BACKGROUND		MIDGROUND
	FOREGROUND		SUCCULENTS
	EXISTING TREE LOCATIONS PER PHASE I		EXISTING PLANTER AREA PER PHASE I

FEATURE LEGEND:

- 1 Renaissance Primary Vehicular and Pedestrian Gate Entries from Linden Avenue. By Others. Per Phase I.
- 2 Tubular Steel View Fence.
- 3 Corner Planter.
- 4 6' High Single Side Public View Split-Face Block Wall.
- 5 6' High Vinyl Privacy Fence.
- 6 3' Wide Private Residence Entry Concrete Path.
- 7 4' Wide Shared Concrete Path.
- 8 Planter Finger within Motor-Court.
- 9 Existing Secondary Residence Vehicular & EVA Gate from Linden Avenue.
- 10 Pedestrian Entry Access Gates. Both Sides.
- 11 Drainage. Per Civil Engineer's Plans.
- 12 Existing Adjacent Property Block Wall.
- 13 Compacted and Stabilized Decomposed Granite Pathway Pass Through and Tree Pit in 6" Concrete Header.
- 14 Fire Hydrant. Per Civil Engineer's Plans.
- 15 Street Parking. Per Civil Engineer's Plans.
- 16 5' Wide Concrete Sidewalk.
- 17 Bench Seating Area at Terminus.
- 18 Combination Retaining and 6' High Block Wall.
- 19 Curb Ramps. Per Civil Engineer's Plans.
- 20 Low Retaining Wall Per Phase I Plans. By Others.
- 21 Storm Drain Structure. Per Civil Engineer's Plans.
- 22 Concrete Flore Out for Connection to Phase I Concrete Sidewalk.
- 23 Combination 6' Wide Stabilized and Compacted Decomposed Granite and 6' Wide Concrete Multi-Use Per Civil Engineer's Plan.
- 24 Stabilized and Compacted Decomposed Granite Layer with Landscape Boulders in 6" Curb.
- 25 Bench seating with enhanced concrete paving.
- 26 Mortared cobble paving.
- 27 Low wall seating at enhanced concrete paving.
- 28 Graspave2 EVA with Removable lockable bollards.
- 29 Pedestrian Walkway and Gated Access/Connection to adjacent commr

TY

Source: Architerra Design Group

FIGURE 4: Conceptual Landscape Plan
Renaissance Phase II Project



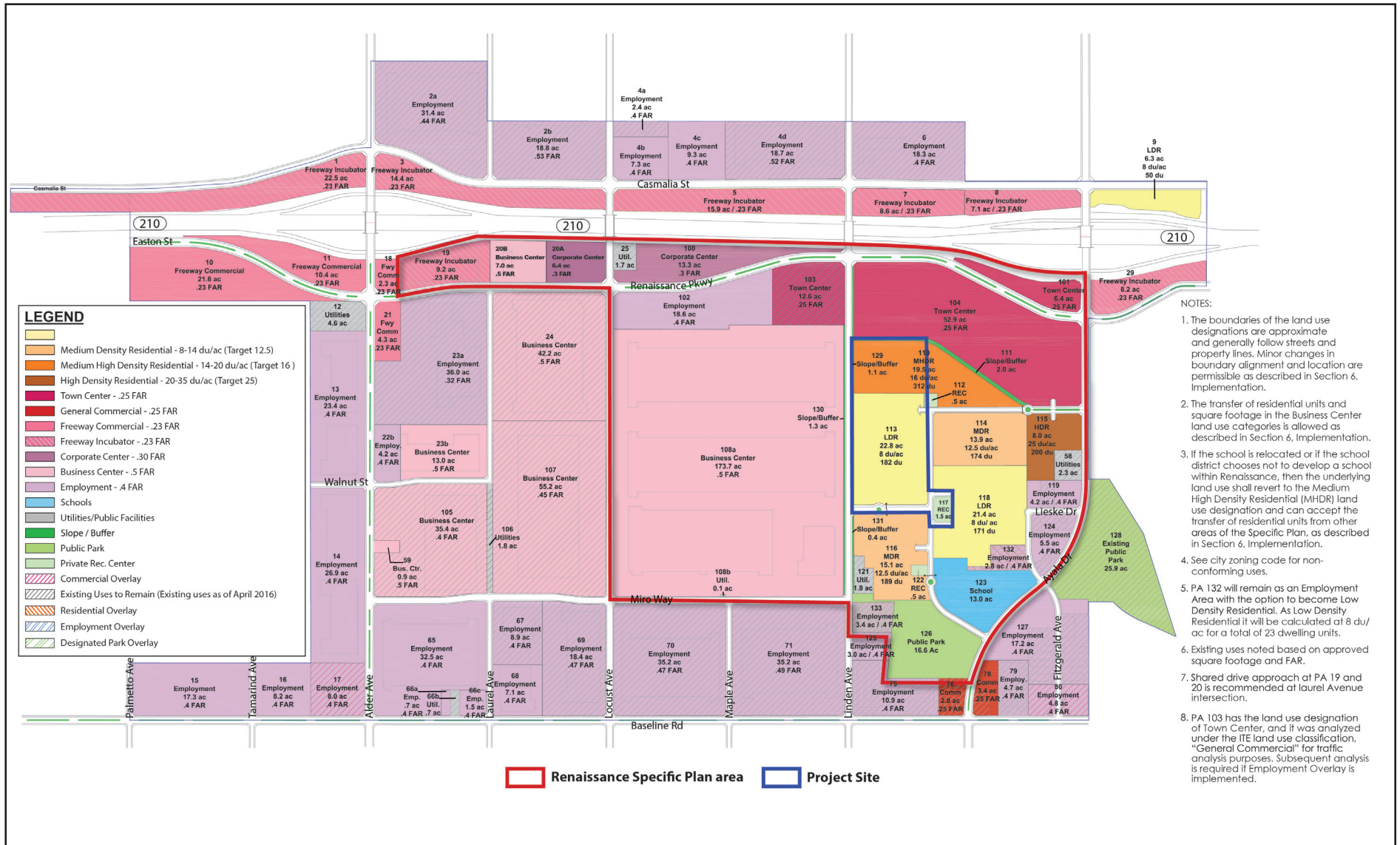


FIGURE 5: Renaissance Specific Plan Amendment Area
Renaissance Phase II Project

3 RENAISSANCE SPECIFIC PLAN AMENDMENT ENVIRONMENTAL IMPACT ANALYSIS SUMMARY

The 2010 RSP Final EIR found the following to be significant and unavoidable impacts:

- Air Quality: Inconsistency with Air Quality Management Plan;
- Air Quality: Cumulative air quality emissions;
- Noise: Exposure of persons to or generation of noise in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- Noise: Result in substantial permanent increase in ambient noise levels;
- Traffic: Cause an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system;
- Traffic: Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways; and
- Greenhouse Gas Emissions (Climate Change): Inconsistent with AB 32's GHG reduction goal by failing to reduce GHG emissions by at least 28 percent below an ARB 2020 No Action Taken ("NAT") scenario.

The 2010 Final SEIR found the following effects to be less than significant with the incorporation of mitigation:

- Air Quality: Exposure of sensitive receptors to substantial pollutant concentrations (health risk);
- Biological Resources: Modification of Coastal California Gnatcatcher habitat;
- Biological Resources: Modification of San Bernardino Kangaroo Rat habitat;
- Biological Resources: Modification of Burrowing Owl habitat;
- Biological Resources: Construction during bird nesting season;
- Cultural Resources: Damage to historic resources;
- Cultural Resources: Damage to prehistoric archaeological resources;
- Cultural Resources: Damage to paleontological resources;
- Geology and Soils: Exposure of persons or structures to seismic hazards;
- Geology and Soils: Erosion during construction;
- Geology and Soils: Erosion during operations;
- Hazards and Hazardous Materials: Removal and disposal of contaminated soils during construction;
- Hazards and Hazardous Materials: 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;
- Hazards and Hazardous Materials: Emit hazardous emissions of handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;

- Hydrology and Water Quality: Storm water discharge requirements and water quality;
- Hydrology and Water Quality: Substantially alter the existing drainage pattern of the site or area;
- Hydrology and Water Quality: Drainage facility capacity;
- Noise: Construction-related and operation-related groundborne vibration;
- Noise: Result in substantial temporary or periodic increase in ambient noise levels;

The 2016 RSPA Final SEIR found the following effects to be less than significant with the incorporation of mitigation:

- Aesthetics: Substantially degrade the existing visual character or quality of the site and its surroundings;
- Air Quality: Violate and air quality standard or contribute to an existing or projected air quality violation;
- Biological Resources: Modification of Coastal California Gnatcatcher habitat;
- Biological Resources: Modification of San Bernardino Kangaroo Rat habitat;
- Biological Resources: Modification of Burrowing Owl habitat;
- Biological Resources: Modification of Plummer's mariposa-lily or Parry's spineflower habitat;
- Biological Resources: Modification of Riversidian Alluvial Fan Sage Scrub habitat;
- Biological Resources: Interfere substantially with the movement of birds;
- Greenhouse Gas Emissions: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases;
- Hydrology and Water Quality: Storm water discharge requirements and water quality;
- Hydrology and Water Quality: Drainage facility capacity;
- Noise: Generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- Noise: A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;
- Traffic: Conflict with the performance of the circulation system (cause an increase in traffic, which is substantial in relation to existing traffic load); and
- Utilities: Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Implementation of mitigation measures identified in the 2010 RSP Final EIR and 2016 RSPA Final SEIR would reduce potentially significant impacts to below a level of significance. As applicable, mitigation measures in the 2010 RSP Final EIR and 2016 RSPA Final SEIR will be incorporated into the proposed Project.

The 2010 RSP Final EIR and 2016 RSPA Final SEIR found that buildout of the 2010 RSP and 2016 RSPA would have a less than significant impact or no impact to the remaining topical areas evaluated in accordance with CEQA and the State CEQA Guidelines.

4 RIALTO RENAISSANCE PROJECT ENVIRONMENTAL IMPACT ANALYSIS

The scope of the City's review of the proposed Project is limited by provisions set forth in CEQA and the State CEQA Guidelines. This review is limited to evaluating the environmental effects associated with the proposed Project as compared to the 2016 RSPA Project as set forth in the 2016 RSPA Final SEIR. 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 2016 RSPA Final SEIR was certified. This evaluation includes a determination as to whether the changes proposed for the Project would result in either new significant effects or an increase in the severity of previously analyzed significant effects.

Although State CEQA Guidelines Section 15164 does not stipulate the format or content of an Addendum, the topical areas identified in the City of Rialto Environmental Checklist (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 2016 RSPA Final SEIR was certified would require additional environmental review or preparation of a Subsequent EIR or Supplemental EIR.

Pursuant to Section 15162 of the State CEQA Guidelines, the City has determined, on the basis of substantial evidence in the light of the whole record, that implementation of the proposed Project does not propose substantial changes to the 2016 RSPA Project, no substantial changes in circumstances would occur which would require major revisions to the 2016 RSPA Final SEIR, and no new information of substantial importance has been revealed since the certification of 2016 RSPA Final SEIR that would result in either new significant effects or an increase in the severity of previously analyzed significant effects.

A Mitigation Monitoring and Reporting Program (MMRP) was adopted as a part of the 2016 RSPA Final SEIR that minimized impacts associated with implementation of the 2016 RSPA Project. The previously adopted mitigation measures applicable to the proposed Project will be imposed as conditions of the Project, and the MMRP, as applicable to the proposed Project, is contained in **Appendix A**.

4.1 Aesthetics

Threshold (a) Have a substantial adverse effect on a scenic vista.

The 2016 RSPA Final SEIR found that conversion of vacant land to residential, commercial, and light industrial land uses as a part of the 2016 RSPA would substantially alter the aesthetic nature of the 2016 RSPA area. However, the 2016 RSPA was considered to be an improvement in the visual characteristic of the Project area and impacts would remain less than significant with mitigation incorporated. Also, the 2016 RSPA Final SEIR concluded that development of the 2016 RSPA would not contribute to urban decay and, therefore, would not result in a degradation of the existing visual character in the primary or secondary trade areas.

The proposed Project would not have a substantial adverse effect on a scenic vista. The dominant scenic views from the project site and the surrounding area include the San Gabriel Mountains and the San Bernardino Mountains. The foothills of the San Bernardino National Forest are located approximately 5 miles to the north. Views of the San Bernardino National Forest are partially obstructed by intervening development. Renaissance Marketplace Shopping Center is located north of the project site; vacant, previously disturbed land is to the south; residential development under construction to the east; and Linden Avenue is to the west, with industrial uses further west of Linden Avenue .

The proposed Project is at a similar elevation as the surrounding area and would be consistent with surrounding development. The proposed Project is currently comprised of Planning Areas 113, 117, and portions of 110, 111, and 129, within the RSPA area. the Project proposes the construction of 292 single-family residential units. The Project proposes two story detached single family dwellings that would be below the maximum building height of 40 feet (3 stories) allowed in the 2016 RSPA planning areas zoned for residential uses. Setbacks, landscaping, and parking requirements would also be in accordance with the 2016 RSPA Residential Development Standards. The Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. Therefore, the Project would be consistent with the finding of less than significant impact for the 2016 RSPA, which allows for greater height on the project site than is proposed by the Project. To further reduce potential visual impacts, the Project would implement Mitigation Measure **AES-1** of the 2016 RSPA Final SEIR, which would require future utility lines associated with the Project to be installed underground. Commercial and industrial uses exist within the immediate vicinity of the project site. Thus, the change in views of the project site from the surrounding area would not cause a significant impact on a scenic vista. Impacts are less than significant.

Accordingly, no new impacts relative to adverse effects on a scenic vista or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would impact the prior finding of no significant impact.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures were identified.

2016 RSPA Final SEIR Mitigation Measures

Mitigation Measure AES-1: Pursuant to Section 15.32 of the City's Municipal Code. Prior to the issuance of grading permits, the project applicant shall submit to the satisfaction of the Public Works Director, evidence that all electrical distribution lines of 16,000 volts or less, telephone lines, cable antenna television and similar service wires or cable, which provide direct service to the property being developed, shall be installed underground.

Project Mitigation Measures

No mitigation is required.

Conclusion

No significant impacts to scenic vistas are identified in the 2016 RSPA Final SEIR. The Project would be designed consistent with the guidelines and standards within the 2016 RSPA. Therefore, no new and/or modified mitigation measures are required for issues related to scenic vistas.

Threshold (b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway.

There are no State- or County-designated scenic highways in the vicinity of the project site.² The closest State designated scenic highway is a segment of State Route 38 (SR 38) (Rim of the World Scenic Byway) from east of South Fork Campground to State Lane, approximately 15.2 miles east of the project site. No County-designated scenic highways are found in the City or surrounding areas. The Project is proposed on land that is currently undeveloped and consists of exposed soil and ruderal vegetation. The surrounding area is planned for development within the 2016 RSPA.

The 2010 RSP Final EIR determined that future development that is consistent with the 2010 RSP would not result in any adverse aesthetic impacts. The 2016 RSPA Final SEIR determined the aesthetic impacts of the 2016 RSPA to be consistent with the 2010 RSP Final EIR. The residential and private recreational uses proposed by the proposed Project would not result in a substantial increase in aesthetics impacts as they are consistent with the uses analyzed in the 2016 RSPA Final SEIR.

Therefore, no adverse impacts on scenic resources, including resources within a State scenic highway, would result from the proposed Project's implementation. Accordingly, no new impacts relative to adverse aesthetic impacts or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would impact the prior finding of no significant impact.

Mitigation Program**2010 RSP Final EIR Mitigation Measures**

No mitigation measures were identified.

2016 RSPA Final SEIR Mitigation Measures

² California Department of Transportation (DOT). (2024). List of eligible and officially designated State Scenic Highways. <https://www.arcgis.com/home/webmap/viewer.html?useExisting=1&layers=f0259b1ad0fe4093a5604c9b838a486a>. Accessed August 2025.

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

No significant impacts to scenic resources are identified in the 2016 RSPA Final SEIR. The proposed Project would be designed consistent with the guidelines and standards within the 2016 RSPA. Therefore, no new and/or modified mitigation measures are required for issues related to scenic resources.

Threshold (c) Substantially degrade the existing visual character or quality of the site and its surroundings.

Both the 2010 RSP Final EIR and 2016 RSPA Final SEIR determined that conversion of predominantly urban vacant land to residential, commercial, and light industrial land uses resulting from implementation of the 2010 RSP would substantially change the aesthetic nature of the project site; however, the development of the Project in a consistent and aesthetically pleasing manner would improve the visual landscape and impacts were determined to be less than significant. The Project would change the project site appearance from previously disturbed vacant land to residential and private recreation land uses. The aesthetic appearance of the development would be consistent with the overall 2016 RSPA, as design guidelines are intended to create a uniform and consistent theme within the entire 2016 RSPA area. Consistent with the 2016 RSPA Residential Development Standards, the Project would include multiple housing types with a variety of design styles, distinct elevations, architectural variation including porticos and porches, and setback variation. Landscaping, lighting, and building heights would be in accordance with the 2016 RSPA Residential Development Standards. The Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR.

Accordingly, no new impacts relative to adverse aesthetic impacts or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would impact the prior finding of no significant impact.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures were identified.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

No significant impacts to visual character are identified in the 2016 RSPA Final SEIR. The proposed Project would be designed consistent with the guidelines and standards within the 2016 RSPA. Therefore, no new and/or modified mitigation measures are required for issues related to visual character.

Threshold (d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

Existing sources of light and glare include street lighting and lights from existing commercial and industrial uses, and lighting associated with SR-210 and Town Center zoned uses located north of the project site. Residential land uses are considered to be sensitive to excessive amounts of light and glare because light trespass can interfere with sleep and other nighttime activities. Poorly designed lighting can also affect the nighttime vision of drivers due to glare. Residential land uses are planned to the south and east of the project site, within the 2016 RSPA area. Consistent with the 2016 RSPA Residential Development Standards, the proposed Project would direct lighting away from adjoining properties and the public right-of-way. Street lighting and residential lighting would be designed per the 2016 RSPA Residential Development Standards and the City's municipal code (i.e., lighting would be directed on to driveways and away from adjacent properties, low-level fixtures for walkway lighting, etc.). Walkways would include low-level fixtures spaced to provide adequate walkway illumination, avoiding intrusion onto other residential dwelling units. Lighting at recreation facilities would consist of low-level walkway fixtures. The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR.

Accordingly, no new impacts relative to adverse aesthetic impacts or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would impact the prior finding of no significant impact.

Mitigation Program

2010 RSPA Final EIR Mitigation Measures

No mitigation measures were identified.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures were identified..

Project Mitigation Measures

No mitigation is required.

Conclusion

No significant impacts to resulting from light and glare are identified in the 2016 RSPA Final SEIR. The proposed Project would be designed consistent with the guidelines and standards within the 2016 RSPA. Therefore, no new and/or modified mitigation measures are required for issues related to light and glare.

Overall Aesthetics Impact Conclusion

With regard to CEQA Section 21166 and the 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. Therefore, the preparation of a subsequent environmental analysis is not warranted.

4.2 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; and**
- Threshold (b) Conflict with existing zoning for agricultural use, or a Williamson Act contract; and**
- 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.**

The 2010 RSP Final EIR determined that the implementation of the 2010 RSP would not adversely affect any existing agricultural resources or operations. Further, the 2010 RSP Final EIR concluded that implementation of the 2010 RSP would not adversely affect other agricultural properties or result in the conversion of farmland to non-agricultural use or forest land to a non-forestry use. Thus, the 2016 RSPA Final SEIR did not evaluate the potential impacts to agricultural and forestry resources as implementation of the 2016 RSPA would not alter the findings of the 2010 RSP Final EIR with respect to agricultural and forestry resources.

No agricultural resources exist on or adjacent to the project site. No Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance is mapped in the Project vicinity; the project site is designated Urban and Built-Up Land.³ Urban and Built-Up Land can consist of land used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.

Furthermore, the project site is not the subject of a Williamson Act Contract.⁴ Additionally, the project site does not include forest resources, including timberlands. No impacts related to the loss of farmland would occur. No significant impacts to agricultural resources are identified in the 2010 RSP Final EIR relative to any property within the 2010 RSP area, including the project site. The project is consistent with the development analyzed in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. Accordingly, no new impact relative to agricultural resources or a substantial increase in the severity of a previously identified significant impact evaluated in the 2010 RSP Final EIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2010 RSP Final EIR was certified is available that would impact the prior finding of no significant impact.

³ Department of Conservation (DOC). (2024). California Important Farmland Finder. Available at: <https://maps.conservation.ca.gov/dlrp/ciff/>. Accessed August 2025.

⁴ DOC. (2017). State of California Williamson Act Contract Land. [https://planning.lacity.gov/eir/HollywoodCenter/Deir/ELDP/\(E\)%20Initial%20Study/Initial%20Study/Attachment%20B%20References/California%20Department%20of%20Conservation%20Williamson%20Map%202016.pdf](https://planning.lacity.gov/eir/HollywoodCenter/Deir/ELDP/(E)%20Initial%20Study/Initial%20Study/Attachment%20B%20References/California%20Department%20of%20Conservation%20Williamson%20Map%202016.pdf). Accessed August 2025.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures were identified.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures were identified.

Project Mitigation Measures

No mitigation is required.

Overall Agricultural and Forestry Resources Impact Conclusion

No significant impacts to agricultural and forestry resources are identified in the 2010 RSP Final EIR. The Project is located within the boundaries of the 2010 RSP area; therefore, no new and/or refined mitigation measures are required for issues related to agricultural resources.

With regard to CEQA Section 21166 and CEQA Guidelines Section 15162(a), the changes proposed by the Project would not result in any new impacts, or increase the severity of the previously identified impacts, with respect to agricultural and forestry resources. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.3 Air Quality

The 2010 RSP Final EIR identified the potential for air quality impacts as a result of 2010 RSP implementation. The 2016 RSPA increased the business and commercial uses from 9.3 million square feet in the 2010 RSP, to 10.7 million square feet, and decreased the residential uses from 1,667 units to 1,262 units. The 2016 RSPA Final SEIR identifies the potential for air quality impacts as a result of Specific Plan implementation. The air quality analysis herein evaluates the potential impacts associated with the development of the proposed Project compared to the maximum allowable development allowed by the 2016 RSPA.

Threshold (a) Conflict with or obstruct implementation of the applicable air quality plan.

The 2010 RSP Final EIR and 2016 RSPA Final SEIR determined construction and operational emissions associated with buildout of the Specific Plan would exceed the South Coast Air Quality Management District (SCAQMD) construction and operational thresholds. As a result, the 2010 RSP Final EIR and 2016 RSPA Final SEIR concluded implementation of the Specific Plan would result in a significant and unavoidable impact related to the air quality plan.

As part of its enforcement responsibilities, the United States Environmental Protection Agency (U.S. EPA) requires each State with nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, State, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under State law, the California Clean Air Act (CCAA) requires an air quality attainment plan to be prepared for areas designated as nonattainment regarding the State and federal ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

The Project is located within the South Coast Air Basin (SCAB), which is under the jurisdiction of the SCAQMD. The SCAQMD is required, pursuant to the Federal Clean Air Act (FCAA), to reduce emissions of criteria pollutants for which the SCAB is in nonattainment. To reduce such emissions, the SCAQMD adopted the 2016 Air Quality Management Plan (AQMP) on March 3, 2017. The 2016 AQMP establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving state (California) and national air quality standards. The purpose of the AQMP is to set forth a comprehensive and integrated program that would lead the SCAB into compliance with the federal 24-hour PM_{2.5} air quality standard, and to update the SCAQMD's commitments towards meeting the federal 8-hour ozone standards. The AQMP incorporates scientific and technological information and planning assumptions, including the 2016 *Regional Transportation Plan/Sustainable Communities Strategy* (2016 Connect SoCal) and updated emission inventory methodologies for various source categories.

On October 1, 2015, the U.S. EPA strengthened the National Ambient Air Quality Standards (NAAQS) for ground-level O₃. The 2022 AQMP, adopted by the SCAQMD Governing Board on December 2, 2022, was developed to address the requirements for meeting the 2015 8-hour O₃ standard. The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low nitrogen oxide (NO_x) technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other FCAA measures to achieve the 2015 8-hour ozone standard. The 2022 AQMP incorporates scientific and technological information and planning assumptions, including the 2020-2045 *Regional Transportation Plan/Sustainable Communities Strategy* (2020 Connect SoCal) and

updated emission inventory methodologies for various source categories. The Project is subject to the SCAQMD's AQMP.

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

1. **Consistency Criterion No. 1** – The Project would not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of the AQMP's air quality standards or the interim emissions reductions.
2. **Consistency Criterion No. 2** – The Project would not exceed the AQMP's assumptions or increments based on the years of the Project build-out phase.

According to the SCAQMD's CEQA Air Quality Handbook, the purpose of the consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and thus if it would interfere with the region's ability to comply with California Ambient Air Quality Standards (CAAQS) and NAAQS.

The violations to which Consistency Criterion No. 1 refers are CAAQS and NAAQS. As shown in **Table 3: Construction-Related Emissions** and **Table 4: Long-Term Operational Emissions**, the Project would not exceed construction or operation emission standards. Therefore, the Project would not contribute to an existing air quality violation. Thus, the Project is consistent with the first criterion.

The project site is comprised of planning areas designated for residential uses by the 2010 RSP and the 2016 RSPA. and would have a net density consistent with the ranges of density and dwelling units assumed and analyzed in the 2010 RSP Final EIR and assumed in the 2016 RSPA Final SEIR. Further, as discussed in Section 2.2, the Project would include fewer units than previously analyzed. The Project proposes 292 units, would generate fewer trips and generate less emissions than assumed for the project site in the 2016 RSPA Final SEIR. Therefore, impacts associated with the proposed Project have been contemplated in the 2010 RSP Final EIR and the 2016 RSPA Final SEIR and no further analysis is required.

Mitigation Program

Mitigation Measures from the 2010 RSP Final EIR

The 2010 RSP Final EIR includes measures to reduce potential impacts associated the implementation of the 2010 RSP project. The following measures from the 2010 RSP Final EIR are applicable to the proposed Project.

Mitigation Measure AQ-01: Prior to construction of the project, the project proponent shall prepare a Large Operation Notification that will describe the application of standard best management practices to control dust during construction. Best management practices (BMP) will include application of water on disturbed soils a minimum of three times per day, covering haul vehicles, replanting disturbed areas as soon as practical, and restricting vehicle speeds on unpaved roads to 15 mph, and other dust control measures, as deemed appropriate to the site or as included in the South Coast Air Quality Management District (SCAQMD) Rule 403. The Large Operation Notification shall be submitted to the City and SCAQMD for approval prior to construction.

Mitigation Measure AQ-02: During project construction, construction equipment shall be properly maintained at an offsite location in accordance with manufacturer's specifications; maintenance shall include proper tuning and timing of engines. The equipment maintenance shall

include proper tuning and timing of engines. The equipment maintenance records and equipment design specification data sheets shall be available during construction and subject to inspection.

Mitigation Measure AQ-03: During project construction, the developer shall require all contractors to turn off all construction equipment when not in use or limit idling to less than 5 minutes.

Mitigation Measure AQ-04: Prior to construction of the project, the project proponent shall prepare a Traffic Control Plan and submit it to the City of Rialto. The Plan shall describe in detail safe detours around the project construction site and congested streets. The Plan shall provide temporary traffic control (e.g., flag person) during construction-related truck hauling activities. The Plan is primarily intended as a safety measure but also can minimize traffic congestion and delays that increase idling and acceleration emissions. The Plan shall include the scheduling of construction truck trips during non-peak hours to reduce peak hour emissions. The Plan shall include the consolidation of truck deliveries, where feasible. The Plan shall also provide for dedicated turn lanes for movement of construction vehicles on-site and off-site. The Plan shall also provide for proper configuration of construction parking to minimize traffic interference. The Plan shall be prepared in accordance with U.S. Department of Transportation Federal Highways Administration Rule on Work Zone Safety 23 CFR 630 Subpart J, Developing and Implementing Traffic Management Plans for Work Zones.

Mitigation Measure AQ-05: Contractors shall construct/build with materials that do not require painting and use pre-painted construction materials to the extent practicable; and use high-pressure-low-volume (HPLV) paint applicators with a minimum transfer efficiency of at least 50 percent or other application techniques with equivalent or higher transfer efficiency. All paints shall be low VOC content paints. For a list of low VOC paints, see www.aqmd.gov/prdas/brochures/paintguide.html.

Mitigation Measure AQ-06: Prior to issuance of a grading permit, a Construction Employee Trip Reduction Plan shall be created. Included in the Plan shall include a shuttle service to and from retail establishments during lunch hour and/or an onsite lunch service. The Plan shall also include carpooling and/or transit incentives for the construction employees.

Mitigation Measure AQ-07: During project construction, onsite electrical hook ups shall be provided for electric construction tools including saws, drills and compressors, to eliminate the need for diesel powered electric generators.

Mitigation Measure AQ-08: Grading activity shall not occur on days with an Air Quality Index forecast for San Bernardino County greater than 100 for particulates or ozone. The categories where grading shall not occur are: unhealthy for sensitive groups, unhealthy, very unhealthy, or hazardous. Air Quality Index forecasts can be obtained at the website: www.airnow.gov/index.cfm?action=airnow.showlocal&CityID=211.

Mitigation Measure AQ-09: All diesel-powered off-road construction equipment in excess of 50 brake horsepower shall be required to have emission construction equipment with a minimum of Tier II diesel particulate filter emission controls resulting in a minimum of 50 percent particulate matter control, if such a filter is available for that piece of equipment. Off-road diesel emission control equipment meeting this requirement can be found at:

www.aqmd.gov/ceqa/handbook/mitigation/offroad/AQ_offroad.html. If CARB adopts more stringent off-road construction equipment control technology for equipment in excess of 50 brake horsepower that is feasible to utilize during the construction of the project it shall be used.

Mitigation Measure AQ-10: The following shall be included in the 2010 RSP:

- 1) Synchronize traffic lights on streets impacted by development;
- 2) Light colored roofing materials shall be used on all exposed roofs;
- 3) Preferential parking for carpool/vanpool vehicles at the non-residential uses;
- 4) Secure weather-protected bicycle parking for employees at the non-residential uses;
- 5) Connect bicycle lanes/paths to project-wide network;
- 6) Provide showers and lockers for employees bicycling or walking to work at the non-residential uses where feasible;
- 7) Short-term bicycle parking for retail customers and other non-commuting trips; and
- 8) Construct transit facilities such as bus turnouts, benches, and shelters that encourage mass transit usage and provide safe pedestrian access from proposed project facilities to transit stops.

Mitigation Measure AQ-13: The following uses shall not be located within the distance specified from an existing or future sensitive receptor (residence, school, hospital, nursing home, daycare center, park and playground): within 500 feet of the 210 Freeway, within 500 feet of the equipment within a dry cleaning facility utilizing Perchloroethylene; and within 300 feet of a fueling station facility (i.e., fuel pumps). These facilities may be located closer than the proscribed distances if a project-specific health risk assessment is performed that demonstrates that the project-specific health risk impacts do not exceed the SCAQMD's health risk significance thresholds.

2016 RSPA Final EIR Mitigation Measures

The 2016 RSPA Final SEIR includes measures to reduce potential impacts associated with the implementation of the 2016 RSPA project. The following measures from the 2016 RSPA Final SEIR are applicable to the proposed Project.

Mitigation Measure AQ-4: Off-Road Diesel Equipment. Prior to the issuance of any grading permits, the Project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that off-road diesel-powered construction equipment greater than 50 horsepower will meet the Tier 4 emission standards, where feasible. In addition, where feasible all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB). Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

Mitigation Measure AQ-5: Construction Equipment Tier Specification. Prior to the mobilization of each applicable off-road diesel-powered construction equipment greater than 50 horsepower, the Project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, a copy of the certified tier specification, Best Available Control Technology (BACT) documentation, and Air Resources Board or South Coast Air Quality Management District's operating permit for each shall be provided at the time of mobilization of each applicable unit of equipment.

Mitigation Measure AQ-8: Super-Compliant VOC Paints. Prior to the issuance of any building permits, the Project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that the construction contractor shall be required to utilize Super-Compliant VOC paints, which are defined by SCAQMD as meeting the "super-compliant" VOC standard of 10 grams per liter (g/L). Use of HVLP or electrostatic spray equipment shall be encouraged.

Mitigation Measure AQ-9: Exterior and Interior Finishes. Prior to the issuance of any building permits, the Project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that exterior and interior finishes that do not require painting shall be used where feasible.

Mitigation Measure AQ-10: Building Orientation. Prior to the issuance of any building permits, the Project applicant shall submit, to the satisfaction of the Public Works Director and Planning Division, evidence that buildings have been oriented and incorporate landscaping to maximize passive solar; heating during cool seasons, and minimize solar heat gain during hot seasons where feasible depending upon site condition and topography.

Project Mitigation Measures

No mitigation is required.

Conclusion

The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and the 2016 RSPA Final SEIR. Allowable development of the site under the 2016 RSPA would include up to 398 units. As such, the proposed development (292 units) would generate fewer trips and generate less emissions than assumed for the project site in the 2016 RSPA Final SEIR. Accordingly, air quality impacts associated with the proposed Project would be less than those assumed for the project site in the 2016 RSPA Final SEIR. Impacts associated with the proposed Project have been contemplated in the 2010 RSP Final EIR and the 2016 RSPA Final SEIR and no further analysis is required. No new impacts relative to a conflict with an applicable air quality plan or a substantial increase in the severity of a previously identified significant impact evaluated in the 2010 RSP Final EIR or the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2010 RSP Final EIR and the 2016 RSPA Final SEIR were certified is available that would impact the prior finding of no significant impact under this issue area.

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

Construction Emissions

The 2010 RSP Final EIR determined construction emissions associated with buildout of the 2010 RSP would exceed the SCAQMD construction standards. As a result, the 2010 RSP Final EIR concluded implementation of the 2010 RSP would result in a significant and unavoidable impact. The 2016 RSPA Final SEIR did not evaluate the potential construction air quality impacts as implementation of the 2016 RSPA would not alter the findings of the 2010 RSP Final EIR with respect to construction emissions for the project site.

Construction associated with the Project would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the Project area include ozone (O₃-) precursor pollutants (i.e. reactive organic gases [ROG] and nitrogen oxide [NO_x]) and coarse particulate matter (PM₁₀) and fine particulate matter (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.

Construction activities associated with the Project are estimated to be completed within approximately 28 months. Construction-generated emissions associated the Project were calculated using the CARB-approved CalEEMod computer program, which is designed to model emissions for land use development projects, based on typical construction requirements. Predicted maximum daily construction-generated emissions for the Project are summarized in **Table 3: Construction-Related Emissions**.

Table 3: Construction-Related Emissions						
Construction Year	Maximum Pounds Per Day					
	ROG	NO_x	CO	SO₂	PM₁₀	PM_{2.5}
Year 1 (2026)	3.31	29.86	30.07	0.07	9.14	5.14
Year 2 (2027)	5.14	28.00	51.81	0.07	5.76	2.66
Year 3 (2028)	70.44	13.28	33.53	0.04	5.86	1.62
<i>Maximum Emissions</i>	<i>70.44</i>	<i>29.86</i>	<i>51.81</i>	<i>0.07</i>	<i>9.14</i>	<i>5.14</i>
SCAQMD Thresholds	75	100	550	150	150	55
Exceed SCAQMD Threshold?	No	No	No	No	No	No
<small>ROG = Reactive Organic Gases; NO_x = Nitrogen Oxides; CO = Carbon Monoxide; SO₂ = Sulfur Dioxide; PM₁₀ = Particulate Matter 10 microns in diameter or less; PM_{2.5} = Particulate Matter 2.5 microns in diameter or less</small>						
<small>Notes: SCAQMD Rule 403 Fugitive Dust applied. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; water exposed surfaces three times 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.</small>						
<small>Source: CalEEMod version 2022.1. Refer to Appendix B for model outputs.</small>						

Fugitive dust emissions may have a substantial, temporary impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the Project vicinity. Uncontrolled dust from

construction can become a nuisance and potential health hazard to those living and working nearby. SCAQMD Rules 402 and 403 (prohibition of nuisances, watering of inactive and perimeter areas, track out requirements, etc.), are applicable to the Project and implementation of Rule 402 and 403 dust control techniques would minimize PM₁₀ and PM_{2.5} concentrations.

As discussed in the 2010 RSP Final EIR and the 2016 RSPA Final SEIR, construction emissions associated with buildout of the Specific Plan would exceed construction standards. The 2016 RSPA Final SEIR assumed a total of 398 dwelling units and the Project proposes 292 dwelling units with a private recreation area. Therefore, the Project would result in a net decrease of 106 dwelling units when compared to the 2016 RSPA Final SEIR.

As shown in **Table 4**, construction emissions would not exceed SCAQMD thresholds for all criteria pollutants. Therefore, impacts would be less than significant. While impacts would be considered less than significant, the Project would be subject to Mitigation Measures **AQ-4**, **AQ-5**, **AQ-8**, and **AQ-9** from the 2016 RSPA Final SEIR to further reduce construction emissions.

Operational Emissions

The 2010 RSP Final EIR determined operational emissions associated with buildout of the 2010 RSP would exceed the SCAQMD operational standards. As a result, the 2010 RSP Final EIR concluded implementation of the 2010 RSP would result in a significant and unavoidable impact. Similarly, the 2016 RSPA Final SEIR concluded operational emissions associated with buildout of the 2016 RSPA would exceed SCAQMD operational standards. Therefore, the 2016 RSPA Final SEIR concluded implementation of the 2016 RSPA would result in a significant and unavoidable impact.

The Project's operational emissions would be associated with area sources (e.g. landscape maintenance equipment, architectural coatings, etc.), energy sources, and mobile sources (i.e., motor vehicle use). Primary sources of operational criteria pollutants are from motor vehicle use and area sources. Long-term operational emissions attributable to the Project are summarized in **Table 5**. The operational emissions sources are described below.

- **Area Source Emissions.** Area source emissions would be generated due to architectural coating applications, consumer products, and landscape maintenance equipment.
- **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 space heating and cooling, water heating, ventilation, lighting, appliances, and electronics.
- **Mobile Source Emissions.** 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 *Traffic Study for the proposed: Renaissance II Residential Project* (Traffic Study), prepared by Kimley-Horn and Associates, Inc. (dated June 2025), and have been incorporated into CalEEMod, as recommended by the SCAQMD. Per the Traffic Study, the Project would generate 2,102 daily vehicle trips. When compared to the 2016

RSPA project-generated 3,005 daily trips, the proposed Project would result in a net decrease of 903 daily trips. Therefore, mobile emissions shown in **Table 5** are conservative as the net decrease of 903 daily trips are not accounted for.

Table 4: Long-Term Operational Emissions						
Source	Maximum Pounds Per Day¹					
	ROG	NO_x	CO	SO₂	PM₁₀	PM_{2.5}
Area	10.95	4.36	28.87	0.03	0.36	0.35
Energy	0.09	1.48	0.67	0.01	0.12	0.12
Mobile	7.33	7.06	64.76	0.17	15.48	4.01
<i>Total Emissions</i>	<i>18.37</i>	<i>12.90</i>	<i>94.29</i>	<i>0.21</i>	<i>15.96</i>	<i>4.48</i>
SCAQMD Thresholds	55	55	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						
Note: Total values are from CalEEMod and may not add up 100% due to rounding.						
1. The highest values between summer and winter results were used as a worst-case scenario.						
Source: CalEEMod version 2022.1. Refer to Appendix B for model outputs.						

As discussed in the 2010 RSP Final EIR and the 2016 Final SEIR, operational emissions associated with buildout of the Specific Plan would exceed the operational standards. The 2016 RSPA Final SEIR assumed a total of 398 dwelling units and the Project proposes 292 dwelling units with a private recreation area. Therefore, the Project would result in a net decrease of 106 dwelling units, and associated net reduction of 903 daily trips, when compared to the 2016 RSPA Final SEIR. As the reduction in dwelling units and associated trips are not accounted for in **Table 5**, emissions presented are conservative.

As shown in **Table 5** and discussed above, operational emissions would not exceed SCAQMD thresholds for all criteria pollutants. Therefore, the Project would not violate any air quality standards or contribute substantially to an existing or projected air quality violation. As a result, operational air quality impacts would be less than significant.

Cumulative Construction Emissions

The SCAB is designated nonattainment for O₃, PM₁₀, and PM_{2.5} for State standards and nonattainment for O₃ and PM_{2.5} for Federal standards. Appendix D of the SCAQMD White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (2003) notes that projects that result in emissions that do not exceed the project-specific SCAQMD regional thresholds of significance should result in a less than significant impact on a cumulative basis unless there is other pertinent information to the contrary. The mass-based regional significance thresholds published by the SCAQMD are designed to ensure compliance with both NAAQS and CAAQS and are based on an inventory of projected emissions in the SCAB. Therefore, if a project is estimated to result in emissions that do not exceed the thresholds, the project's contribution to the cumulative impact on air quality in the SCAB would not be cumulatively considerable. As shown in **Table 4** above, Project construction-related emissions would not exceed the SCAQMD significance thresholds for criteria pollutants. Therefore, the proposed Project would not generate a cumulatively considerable contribution to air pollutant emissions during construction.

The SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the FCAA mandates. The analysis assumed fugitive dust controls required pursuant to SCAQMD rules and regulations (e.g., SCAQMD Rule 403) would be utilized during construction, including frequent water applications. SCAQMD rules, mandates, and compliance with adopted AQMP emissions control measures would also be imposed on construction projects throughout the SCAB, which would include related projects. Compliance with SCAQMD rules and regulations would further reduce the Project construction-related impacts. Therefore, Project-related construction emissions, combined with those from other projects in the area, would not substantially deteriorate local air quality. Construction emissions associated with the Project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

Cumulative Operational Impacts

The SCAQMD has not established separate significance thresholds for cumulative operational emissions. The nature of air emissions is largely a cumulative impact. As a result, no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, individual project emissions contribute to existing cumulatively significant adverse air quality impacts. The SCAQMD developed the operational thresholds of significance based on the level above which individual project emissions would result in a cumulatively considerable contribution to the SCAB's existing air quality conditions. Therefore, a project that exceeds the SCAQMD operational thresholds would also be a cumulatively considerable contribution to a significant cumulative impact.

Table 6 shows that the Project operational emissions would not exceed the SCAQMD thresholds. As a result, operational emissions associated with the Project would not represent a cumulatively considerable contribution to significant cumulative air quality impacts. Therefore, cumulative operational impacts would be less than significant.

Mitigation Program

The 2010 RSP Final EIR includes measures to reduce potential impacts associated the implementation of the 2010 RSP. Mitigation Measures **AQ-01** through **AQ-10**, and **AQ-13**, shown above, are required.

The 2016 RSPA Final SEIR includes measures to reduce potential impacts associated with the implementation of the 2016 RSPA. Mitigation Measures **AQ-4** through **AQ-5** and **AQ-8** through **AQ-10**, shown above, are required.

Conclusion

The Project's emissions would not exceed the SCAQMD thresholds during both construction and operations. Thus, the impact would not be cumulatively considerable. Air quality impacts related to the proposed Project are within the limit of impacts identified in the 2016 RSPA Final SEIR. No new impacts or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would impact the prior finding of no significant impact under this issue area.

Threshold (c) Expose sensitive receptors to substantial pollutant concentrations?

Localized Construction Emissions Analysis

The 2010 RSP Final EIR and 2016 RSPA Final SEIR determined localized construction emissions associated with buildout of the Specific Plan would not exceed health risk thresholds. As a result, the 2010 RSP Final EIR and 2016 RSPA Final SEIR concluded localized construction emissions impacts associated with implementation of the Specific Plan would be less than significant.

The nearest sensitive receptors are the residential uses currently under construction adjacent to the east of the project site. To identify impacts to sensitive receptors, the SCAQMD recommends addressing local significance thresholds (LSTs) for construction. LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative. 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.

Since 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 5: Equipment-Specific Grading Rates**, is used to determine 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. 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 3.5 acres in a single day. As the LST guidance provides thresholds for projects disturbing 1-, 2-, and 5-acres in size and the thresholds increase with size of the site, the LSTs for a 3.5-acre threshold were interpolated and utilized for this analysis.

Table 5: 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	Crawler Tractors	1	0.5	8	0.5
	Graders	1	0.5	8	0.5
	Dozers	1	0.5	8	0.5
	Scrapers	2	1.0	8	2
Total Acres Graded per Day					3.5
Source: CalEEMod version 2022.1. Refer to Appendix B 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. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. According to SCAQMD LST Methodology, projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters. As the nearest sensitive receptors are currently under construction adjacent to the east of the project site, the LST values for 25 meters (82 feet) were used. **Table 6: Localized Construction Emissions**, presents the results of localized emissions during each construction phase, as well as overlapping construction phases. **Table 7** shows that localized construction emissions on the peak day of construction

would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, localized construction emissions would be less than significant.

Construction Activity	Maximum Pounds Per Day			
	NO _x	CO	PM ₁₀	PM _{2.5}
Site Preparation (2026)	29.16	28.81	8.91	5.08
Grading (2026)	28.59	28.12	5.05	2.60
Grading (2027)	26.77	27.80	4.95	2.51
Infrastructure Improvements (2027)	3.20	5.23	0.10	0.09
Building Construction (2027)	9.39	12.94	0.34	0.31
Building Construction (2028)	8.92	12.94	0.30	0.28
Paving (2027)	6.94	9.95	0.30	0.27
Architectural Coating (2028)	0.81	1.12	0.02	0.01
Building Construction/ Paving/ Infrastructure Improvements (2027)	19.53	28.12	0.74	0.68
Building Construction/ Architectural Coating (2028)	9.73	14.05	0.32	0.29
<i>Maximum Daily Emissions</i>	29.16	28.81	8.91	5.08
SCAQMD Localized Screening Threshold (adjusted for 3.5 acres at 25 meters)	220	1,359	11	6
Exceed SCAQMD Threshold?	No	No	No	No
NO _x = Nitrogen Oxides; CO = Carbon Monoxide; PM ₁₀ = Particulate Matter 10 microns in diameter or less; PM _{2.5} = Particulate Matter 2.5 microns in diameter or less				
Source: CalEEMod version 2022.1. Refer to Appendix B for model outputs.				

Localized Operational Emissions Analysis

The 2010 RSP Final EIR and 2016 RSPA Final SEIR determined localized operational emissions associated with buildout of the Specific Plan would not exceed health risk thresholds. As a result, the 2010 RSP Final EIR and 2016 RSPA Final SEIR concluded localized operational emissions impacts associated with implementation of the Specific Plan would be less than significant.

According to the SCAQMD LST methodology, LSTs apply to on-site sources. LSTs for receptors located at 25 meters for SRA 34 were used in this analysis. The 5-acre LST threshold was utilized as the project site encompasses 39.6 acres. The operational emissions shown in **Table 7: Localized Operational Emissions** include all on-site Project-related stationary sources (i.e., area and energy sources). The maximum daily emissions of these pollutants during operations would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, localized operational emissions would be less than significant.

Activity	Maximum Pounds Per Day			
	NO _x	CO	PM ₁₀	PM _{2.5}
On-Site Emissions	5.85	29.54	0.48	0.47
SCAQMD Localized Screening Threshold	270	1,746	4	2

Table 7: Localized Operational Emissions				
Activity	Maximum Pounds Per Day			
	NO_x	CO	PM₁₀	PM_{2.5}
<i>(adjusted for 5 acres at 25 meters)</i>				
Exceed SCAQMD Threshold?	No	No	No	No
NO _x = Nitrogen Oxides; CO = Carbon Monoxide; PM ₁₀ = Particulate Matter 10 microns in diameter or less; PM _{2.5} = Particulate Matter 2.5 microns in diameter or less				
Source: CalEEMod version 2022.1. Refer to Appendix B for model outputs.				

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 FCAA, which defines a major stationary source (in extreme O₃ nonattainment areas such as the SCAB) 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 Program⁵ was created by the FCAA to ensure that stationary sources of air pollution are constructed or modified in a manner that is consistent with attainment of health-based NAAQS. The NAAQS establish the levels of air quality necessary, 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, localized effects of on-site Project emissions on nearby receptors were found to be less than significant (refer to **Table 7** and **Table 8**). 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 CAAQS or NAAQS. The LSTs were developed by the SCAQMD based on the ambient concentrations of that pollutant for each SRA 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. Information on health impacts related to exposure to ozone and particulate matter emissions published by the U.S. EPA and CARB have been summarized and included in **Appendix B**. 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 or cause an increase in the frequency or severity of existing violations of 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

An analysis of CO "hot spots" is needed to determine whether the change in the level of service of an intersection resulting from the Project would have the potential to result in exceedances of the CAAQS or NAAQS. It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent). With the turnover of older vehicles,

⁵ 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)]

introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined. Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard.

The SCAB was re-designated as attainment in 2007 and is no longer addressed in the SCAQMD's AQMP. The 2003 AQMP is the most recent version that addresses CO concentrations. As part of the SCAQMD *CO Hotspot Analysis*, the Wilshire Boulevard and Veteran Avenue intersection, one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 ppm, which is well below the 35-ppm Federal standard. The Project considered herein would not produce the volume of traffic required to generate a CO hot spot in the context of SCAQMD's *CO Hotspot Analysis*. As the CO hotspots were not experienced at the Wilshire Boulevard and Veteran Avenue intersection even as it accommodates 100,000 vehicles daily, it can be reasonably inferred that CO hotspots would not be experienced at any vicinity intersections resulting from 2,102 additional vehicle trips attributable to the Project. In addition, the 2016 RSPA analyzed and allows the development of up to 398 dwelling units that would generate a total of 3,005 daily trips, 903 more trips than the proposed Project's 292 dwelling units. Therefore, impacts associated with the proposed Project have been contemplated in the 2010 RSP Final EIR and 2016 RSPA Final SEIR and no further analysis is required. Impacts would be less than significant.

Construction-Related Diesel Particulate Matter

Construction would result in the generation of DPM emissions from the use of off-road diesel equipment required. The amount to which the receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e. potential exposure to TAC emission levels that exceed applicable standards). Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer.

The use of diesel-powered construction equipment would be temporary and episodic. The duration of exposure would be short and exhaust from construction equipment dissipates rapidly. Current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 30, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities. The California Office of Environmental Health Hazard Assessment has not identified short-term health effects from DPM. Construction is temporary and would be transient throughout the site (i.e., move from location to location) and would not generate emissions in a fixed location for extended periods of time which would limit the exposure of any proximate individual sensitive receptor to TACs.

As previously discussed, the 2016 RSPA Final SEIR assumed a total of 398 dwelling units and the Project proposes 292 dwelling units with a private recreation area. Therefore, the Project would result in a net decrease of 106 dwelling units when compared to the 2016 RSPA Final SEIR. As shown in **Table 4** and **Table 7**, local and regional construction emissions would not exceed SCAQMD thresholds for all criteria pollutants.

Construction would be subject to and would comply with California regulations limiting the idling of heavy-duty construction equipment to no more than 5 minutes to further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions. For these reasons, DPM generated by construction activities, in and of itself, would not be expected to expose sensitive receptors to substantial amounts of air toxics and the Project would have a less than significant impact.

Mitigation Program

The 2010 RSP Final EIR includes measures to reduce potential impacts associated with the implementation of the 2010 RSP. Mitigation Measures **AQ-01** through **AQ-10**, and **AQ-13** shown above, are required.

The 2016 RSPA Final SEIR includes measures to reduce potential impacts associated with the implementation of the 2016 RSPA. Mitigation measures **AQ-4** through **AQ-5** and **AQ-8** through **AQ-10**, shown above, are required.

Conclusion

The 2010 RSP Final EIR and 2016 RSPA Final SEIR determined localized construction and operational emissions associated with buildout of the Specific Plan would not exceed health risk thresholds. As a result, the 2010 RSP Final EIR and 2016 RSPA Final SEIR concluded localized construction and operational impacts associated with implementation of the Specific Plan would be less than significant. Air quality impacts related to the proposed Project are within the limit of impacts identified in the 2016 RSPA Final SEIR. No new impacts or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would impact the prior finding of no significant impact under this issue area.

Threshold (d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Construction

The 2010 RSP Final EIR determined construction odors associated with buildout of the 2010 RSP would be less than significant. The 2016 RSPA Final SEIR did not evaluate the potential construction odor impacts as implementation of the 2016 RSPA would not alter the findings of the 2010 RSP Final EIR with respect to construction odor.

Construction activities are required to follow SCAQMD Rule 402 to prevent odor nuisances on sensitive land uses. SCAQMD Rule 402, Nuisance, states:

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

Odors may be generated during construction activities such as, equipment diesel exhaust, architectural coatings VOCs, and paving activities. These odors would be temporary, are not expected to affect a substantial number of people, and would disperse rapidly. Therefore, impacts related to odors associated with the Project's construction-related activities would be less than significant.

Operations

The 2010 RSP Final EIR determined operational odors associated with buildout of the 2010 RSP would be less than significant. The 2016 RSPA Final SEIR did not evaluate the potential operational odor impacts as implementation of the 2016 RSPA would not alter the findings of the 2010 RSP Final EIR with respect to operational odor.

The SCAQMD *CEQA Air Quality Handbook* identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Project would not include any of the land uses that have been identified by the SCAQMD as odor sources. Therefore, impacts related to odors associated with Project operations would be less than significant.

Mitigation Program

None identified in the 2010 RSP Final EIR or 2016 RSPA Final SEIR.

Conclusion

The 2010 RSP Final EIR determined construction and operational odors associated with buildout of the 2010 RSP would be less than significant. Air quality impacts related to the proposed Project are within the limit of impacts identified in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. No new impact relative to air quality or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would alter the 2016 Final SEIR's significance finding.

Overall Air Quality Impact Conclusion

There are no new potentially significant impacts associated with the proposed Project; therefore, no new and/or refined mitigation measures are required for issues related to air quality.

With regard to CEQA Section 21166 and CEQA Guidelines Section 15162(a), the changes proposed by the Project would not result in any new impacts, or increase the severity of the previously identified impacts, with respect to air quality. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.4 Biological Resources

Rocks Biological Consulting (RBC) conducted a biological assessment for the Project in March 2025. A memorandum documenting the results is included as **Appendix C**. The survey was conducted to confirm and/or update project site conditions documented in the 2016 RSPA Final SEIR.

The 2016 RSPA Final SEIR determined that potentially significant impacts would occur to special status wildlife species, including Coastal California Gnatcatcher (*Polioptila californica*) (CAGN), San Bernardino Merriam's Kangaroo Rat (*Dipodomys merriamii*) (SBKR), Western Burrowing Owl (*Athene cunicularia*) (BUOW), sensitive plant species (Plummer's mariposa-lily and Parry's spineflower), Riversidian alluvial fan sage scrub (RAFSS) habitat, and nesting birds. Specifically, implementation of land uses within the 2016 RSPA would directly impact suitable habitat for CAGN, SBKR, BUOW, sensitive plant species and RAFSS habitat as well as habitat to support nesting grassland bird species. Implementation of Mitigation Measures BIO-1 through BIO-6 were found to reduce impacts to special status wildlife and plant species to a less than significant level. Mitigation Measures BIO-1, BIO-2, and BIO-4 require that surveys be performed for individual projects to determine the presence/absence of special status species. As described below, Mitigation Measures BIO-1, BIO-2, BIO-4, and BIO-5 are no longer applicable to the proposed Project because they have either been satisfied since the 2016 RSPA Final SEIR was certified or there is no suitable habitat found on the project site that would warrant the mitigation measure. Mitigation Measure **BIO-3** requires a BUOW Long-term Management Plan (LTMP) be prepared and approved by California Department of Fish and Wildlife (CDFW). A BUOW Exclusion Plan was prepared by Michael Baker in February 2017 and approved by CDFW. However, this Project would also comply with the remaining requirements described in Mitigation Measure **BIO-3** by conducting pre-construction surveys for BUOW; one survey 14 days and one survey 24 hours prior to construction activities in accordance with the guidelines outlined in the *CDFW Staff Report on Burrowing Owl Mitigation* (2012). Mitigation Measure **BIO-6** requires pre-construction bird nest surveys if construction would occur during the nesting season (February through August). Mitigation Measures **BIO-3** and **BIO-6** will need to be satisfied by the proposed Project prior to grading.

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

Crotch's Bumble Bee

California Department of Fish and Wildlife (CDFW) designates Crotch's bumble bee as a Candidate for Listing under the California Endangered Species Act (CESA). RBC assessed the project site for suitable Crotch's bumble bee habitat in accordance with the Survey Considerations for CESA Candidate Bumble Bee Species. Suitable habitat for Crotch's bumble bee includes a variety of open shrub and grassland vegetation communities that support significant stands of nectar sources, mostly in the form of flowering annuals. Crotch's bumble bee primary nectar sources include *Medicago* spp., *Lupinus* spp., *Chaenactis* spp., *Asclepias* spp., *Phacelia* spp., and *Salvia* spp., which have easily accessible nectar that accommodates the species' relatively short tongue.

Crotch's bumble bee nest underground using small mammal burrows and typically overwinter in soft, disturbed soil or under leaf litter and other debris. Crotch's bumble bee records are limited in the vicinity of the project site. According to CDFW's Natural Diversity Database (CNDDDB), only five records occur within five miles of the project site, only two of which were recorded in the last 25 years. Due to the lack of available nectar sources, the lack of suitable nesting habitat, and the overall lack of previous records in

the vicinity, Crotch's bumble bee is not anticipated to occur on site. As such, no impact to Crotch's bumble bee would occur as a result of the Project.

Coastal California Gnatcatcher

Coastal California gnatcatchers are year-round residents of southern California found in the six southernmost California counties (Ventura, Los Angeles, Orange, Riverside, San Bernardino, and San Diego) located within the coastal plain. The species typically occurs in coastal sage scrub communities dominated by California sagebrush (*Artemisia californica*) and California buckwheat.

Coastal California gnatcatcher is typically found in stands of sage scrub that have moderate shrub canopy cover, generally greater than 50 percent. Coastal California gnatcatchers will use sparsely vegetated sage scrub as long as perennial shrubs are available, although there appears to be a minimum cover threshold below which the habitat becomes unsuitable. Both breeding and non-breeding season surveys were conducted for coastal California gnatcatcher within the Renaissance Specific Plan Area in 2016 by Kidd Biological, Inc., and RBC. The surveys occurred adjacent to or partially within the current Project site. Although the survey areas supported suitable habitat, both breeding and non-breeding season surveys were negative for coastal California gnatcatcher. Based on the limited suitable habitat on the project site and the previous negative surveys in the immediate vicinity of the project site, coastal California gnatcatcher is not anticipated to occur on site. RBC conducted a habitat assessment by surveying for suitable sage scrub habitat on site during the 2025 survey. Based on the results of the 2025 habitat assessment, minimal suitable sage scrub habitat is present on site. Shrub cover is sparse and low-growing on site presenting a lack of adequate foraging habitat or cover for gnatcatchers on site. Based on observations of on-going site disturbance and the isolation of the site from other patches of sage scrub in the greater Specific Plan Area, coastal California gnatcatcher is not anticipated to occur on-site. No impact to Coastal California gnatcatcher would occur as a result of the Project.

San Bernardino Kangaroo Rat

San Bernardino kangaroo rat is typically restricted to pioneer and intermediate Riversidian Alluvial Fan Sage Scrub (RAFSS) habitat, with sandy soils deposited by fluvial rather than wind processes. In addition, San Bernardino kangaroo rat requires sparsely vegetated habitat areas and is documented as being negatively impacted by the presence of dense, non-native herbs and grasses. Kangaroo rat sign (e.g., scat, dust baths, seed caches, tail drags) was documented within the larger 2016 RSPA SEIR study area during the 2015 habitat assessment; however, a subsequent live-trapping survey for San Bernardino kangaroo rat was conducted in 2017 with negative results.

RBC conducted a habitat assessment within the proposed Renaissance Residential project area by surveying for suitable habitat, suitable burrows, and kangaroo rat sign during the 2025 survey. The project site does not support RAFSS vegetation or open, sandy/alluvial substrates suitable for San Bernardino kangaroo rat. No kangaroo rat burrows or sign were documented during the habitat assessment, with site conditions degraded further from those observed during 2016 RSPA SEIR protocol-level surveys. As such, San Bernardino kangaroo rat is not anticipated to occur on-site. No impact to the San Bernardino kangaroo rat would occur as a result of the Project.

Burrowing Owl

On October 10, 2024, the California Fish and Game Commission voted to elevate burrowing owl from a CDFW Species of Special Concern (SSC) to a Candidate for Listing under the CESA. As such, burrowing owl is currently afforded the same protections as a State-listed endangered or threatened species. RBC assessed the project site for burrowing owl habitat in accordance with the CDFW Staff Report on

Burrowing Owl Mitigation. Suitable burrowing owl habitat can be found in annual and perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. Suitable owl habitat may also include trees and shrubs if the canopy covers less than 30 percent of the ground surface. Burrows are the essential component of burrowing owl habitat; both natural and artificial burrows provide protection, shelter, and nests for burrowing owl. Burrowing owls typically use burrows made by rodents, such as California ground squirrels (*Otospermophilus beecheyi*) or American badgers (*Taxidea taxus*) but may also use human-made structures, such as concrete culverts; concrete, asphalt, or wood debris piles; or openings beneath concrete or asphalt pavement.

Burrowing owl are well-documented within the 2016 RSPA area. An occupied burrow supporting a pair of adult owls was observed on site during focused surveys conducted in 2016. Suitable habitat for burrowing owl occurs on the project site in the form of sparse, low-growing vegetation and debris piles. Suitable burrows were observed on large berm on the north side of the project site during the 2025 survey. The burrows appeared unoccupied based on the lack of sign at burrow entrances and lack of owl observations; however, focused burrowing owl surveys were not conducted on the site. No other burrows were documented on-site, likely due to past disking and a lack of California ground squirrel activity. Although Burrowing owl have a low potential to occur on-site, the Project would implement Mitigation Measures **BIO-3** to reduce potential impacts to Burrowing owl. The Project would have a less than significant impact on Burrowing owl.

Parry's Spineflower

The 2015 Renaissance Specific Plan Habitat Assessment identified the potential for Parry's spineflower to occur within the larger Specific Plan Area. Parry's spineflower is an annual plant species with many-branched stems that sprawl over the ground. It is listed by the California Native Plant Society (CNPS) as CRPR 1B.1; rare, threatened, or endangered in California and elsewhere, and seriously endangered in California. This species occurs within sandy or rocky openings of the alluvial chaparral and scrub of the San Gabriel, San Bernardino and San Jacinto Mountains. Parry's spineflower can also be found in cismontane woodland and valley and foothill grassland habitats and has a blooming period from April to June.

According to the 2016 RSPA SEIR, the closest known occurrence of Parry's spineflower was identified in 2012 approximately 0.20 miles north of the project site, north of SR-210. The most recent occurrence of this species in the vicinity of the project site occurred on May 22, 2012, approximately 1.5 miles northeast of the project site near the confluence of Cajon and Lytle Creek washes.

A habitat suitability assessment for Parry's spineflower was conducted in 2016 for the larger Specific Plan Area. Habitat suitability within the Renaissance Residential project area was considered low or unsuitable (Michael Baker International 2016). The species was not observed during the 2025 general biological survey. Based on the high level of site disturbance and previous negative surveys, this species is not anticipated to occur on-site. No impact to Parry's spineflower would occur as a result of the Project.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

Mitigation is required to reduce potentially significant impacts to a level of less than significant. Mitigation measures originally adopted in the 2016 RSPA Final SEIR have been amended through approval of the Subsequent EIR for the 2025 RSPA Specific Plan Amendment (SCH No. 2024070224). Biological mitigation measures were refined to reflect current regulatory conditions, including the designation of BUOW as a State candidate species. Mitigation Measures **BIO-1A** and **BIO-4B** would reduce potentially significant impacts to BUOW and nesting birds, respectively, to a less than significant level. Accordingly, there are no new potentially significant impacts associated with the proposed Project; therefore, no new mitigation measures are required for issues related to biological resources.

Mitigation Measure BIO-1A: Prior to project construction activities, an updated potential to occur assessment shall be completed. Species to be addressed shall include all those which meet the CEQA definition (CEQA Guidelines § 15380) for which suitable habitat is present within or adjacent to the project site. If deemed necessary, pre-construction species-specific surveys, completed by a qualified biologist and conducted at the appropriate time of day when the sensitive species are active or otherwise identifiable, shall be conducted. Acceptable species-specific survey procedures shall follow CDFW and USFWS guidance, where applicable.

Mitigation Measure BIO-1B: Prior to the start of project construction activities, a qualified biologist shall conduct a comprehensive pre-construction wildlife survey. This survey must be completed within one week before any ground-disturbing activities or vegetation removal begins. The survey shall include 100% coverage of the project site, as well as a 100-foot buffer zone surrounding the site to identify and document any wildlife species present in adjacent areas. All species observed during the survey shall be recorded and mapped accordingly.

Mitigation Measure BIO-1C: If necessary, appropriate avoidance and minimization measures shall be developed to protect sensitive wildlife species identified during the pre-construction survey. These measures may include establishing species-specific no-disturbance buffer zones. If wildlife is observed within the project footprint and cannot be avoided, individuals may be relocated to suitable habitat outside the impact area by a qualified biologist. All relocations shall be conducted under the appropriate permits and authorizations from relevant wildlife agencies.

Mitigation Measure BIO-1D: A biologist shall flush special-status species (i.e., avian or other mobile species), with the exception of burrowing owl, from suitable habitat areas within the Project development footprint to the maximum extent practicable immediately (e.g., within 24 hours) prior to initial vegetation removal activities. The biologist shall flush wildlife by walking through habitat to be immediately removed and towards adjacent remaining suitable habitat.

Mitigation Measure BIO-1E: Construction vehicles shall not exceed 15 miles per hour on unpaved roads adjacent to the project site or the right-of-way accessing the project site.

Mitigation Measure BIO-1F: The Project applicant, or its contractors, shall 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. The pipes, culverts, and similar structures shall be inspected by the Project biologist for wildlife before such material is moved, buried, or capped.

Mitigation Measure BIO-1G: Construction activities shall occur during daytime hours to the greatest extent feasible. If construction must occur at nighttime, lights shall be oriented in such a way that they direct light downward and toward the active construction, ensuring that no direct

light is emitted towards adjacent lands, and shields or deflectors shall be installed on lights to reduce light spill. Nighttime concrete pouring shall be performed in accordance with the City of Rialto Municipal Code.

Mitigation Measure BIO-1H: 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 shall thoroughly inspect holes and trenches for trapped animals during biological monitoring.

Mitigation Measure BIO-1J: Contractors shall not permit pets on the construction site.

Mitigation Measure BIO-1K: 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.

Mitigation Measure BIO-3A: Prior to initial ground disturbing activities, a Worker Environmental Awareness Program (WEAP) shall be prepared, which will include a training presentation and key fact sheet. The training will instruct construction crews to be aware of and recognize burrowing owls and other sensitive biological resources that may be encountered within, or adjacent to, the project. The training will provide workers with instructions to follow in the event a burrowing owl is observed or suspected to be on site.

Biologists shall provide WEAP training materials, including but not limited to the key fact sheet, to construction personnel before their commencement of work on the project. Additionally, all construction staff shall attend the WEAP training presentation prior to beginning work on-site. A refresher WEAP training will be completed on an annual basis thereafter. Note that the fact sheet shall be provided in other languages, as necessary, to accommodate non-English speaking workers.

Upon completion of the WEAP training, each member of the construction crew shall sign a form stating that they attended the training, understood the information presented, and agreed to comply with the requirements set out in the WEAP training. On an annual basis, the project proponent shall certify that WEAP training has been provided to all construction personnel. Biologists shall provide updates relevant to the training to construction personnel during the safety ("tailgate") meetings, as needed.

Mitigation Measure BIO-3B: Suitable burrowing owl habitat and burrowing owl presence has been confirmed on the site; therefore, focused burrowing owl surveys shall be conducted by a qualified biologist, familiar and experienced in burrowing owls, in accordance with the CDFW BUOW Guidelines (2012 or most recent version) prior to vegetation removal or ground-disturbing activities for all phases of project construction and surrounding 500 foot radius.

Take avoidance surveys shall be conducted no less than 14 days prior to initiation of project-related activities. Burrowing owls may re-colonize a site after only a few days. Time lapses

between Project activities trigger subsequent take avoidance surveys including but not limited to a final survey conducted within 24 hours prior to ground disturbance, in accordance with the CDFW BUOW Guidelines (2012 or most recent version). Upon beginning ground-disturbing activities or vegetation removal, a biologist shall be on hand to perform monitoring during all construction activities every day to ensure no impacts occur to burrowing owls as a result of the project

Should burrowing owls, active burrows, or signs thereof be confirmed during any survey or biological monitoring, Project activities with the potential to impact burrowing owl shall be immediately halted. The qualified biologist shall coordinate with CDFW and prepare a Burrowing Owl Plan that shall be submitted to CDFW for review and approval prior to commencing Project activities. The Burrowing Owl Plan shall describe proposed avoidance, and monitoring actions. The Burrowing Owl Plan shall include the number and location of occupied burrow sites, acres of burrowing owl habitat that will be impacted, details of site monitoring, and details on proposed buffers and other avoidance measure if avoidance is proposed. Project activities with the potential to impact burrowing owl shall not occur within 1,000 feet of an active burrow until CDFW approves the Burrowing Owl Plan.

If Project activities, including burrow exclusion and closure, could result in take of burrowing owl, the project proponent shall begin early coordination with CDFW for appropriate CESA authorization (i.e., ITP under CFGC section 2081) prior to commencement of Project activities. The ITP shall describe, at a minimum, Project activities and equipment, proposed avoidance/buffers, temporary and permanent impacts, monitoring, relocation and/or translocation, and minimization and compensatory mitigation actions. ITP compensatory mitigation will be fulfilled by one or more of following options: 1) Conservation or Mitigation Bank credits (if available) 2) Mitigation Credit Agreements 3) Permittee-responsible mitigation land acquisition.

Mitigation Measure BIO-4A: 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). Regardless of the time of year, 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.

Mitigation Measure BIO-4B: 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 measures may not be necessary to avoid impacts to nesting birds.

Conclusion

Although there is suitable habitat proximate to the project site, there is no new impact relative to special status wildlife species (including BUOW and nesting birds) nor does it represent a substantial increase in

the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur with implementation of the proposed Project. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would alter the impact finding of special status wildlife species.

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

The 2015 Renaissance Specific Plan Habitat Assessment identified the potential for Parry's spineflower to occur within the larger Specific Plan Area, which is a rare, threatened, or endangered plant species. According to the 2016 RSPA FEIR, the closest known occurrence of Parry's spineflower was identified in 2012, 1.5 miles northeast of the project site. A habitat suitability assessment for Parry's spineflower was conducted in 2016 for the larger Specific Plan Area. Habitat suitability within the project area was considered low or unsuitable. The species was not observed during the 2025 general biological survey. Based on the high level of site disturbance and previous negative surveys, this species is not anticipated to occur on site. As such, implementation of the proposed Project would not result in substantial adverse effect on sensitive natural communities. No impact would occur and no mitigation is required.

The proposed Project is consistent with the development contemplated and analyzed in the 2010 RSP Final EIR and the 2016 RSPA Final SEIR.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

No new impacts relative to riparian habitat or other sensitive natural community or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur with implementation of the proposed Project. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would change the finding of less than significant impact under this threshold.

Threshold (c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

The 2010 RSP Final EIR states that no jurisdictional waters were identified within the RSP. No channels or other features that carry water including blue line features or drainages with ordinary high water marks were observed.

The proposed Project would not impact any jurisdictional waters, including federally protected wetlands such as marshes, vernal pools, or coastal areas, since no channels or other features that carry water, are present on-site. This finding of no significant impact to wetlands is consistent with the 2010 RSP Final EIR for the 2010 RSP and the 2016 RSPA EIR which identified no impacts to jurisdictional waters. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would change the finding of less than significant impact under this threshold.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

There are no new potentially significant impacts associated with the proposed Project; therefore, no new and/or refined mitigation measures are required.

Threshold (d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

The 2016 RSPA Final SEIR determined that the 2016 RSPA is not located within a known wildlife corridor. Construction of the proposed Project would not impact a wildlife corridor. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would change the finding of less than significant impact under this threshold.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

There are no new potentially significant impacts associated with the proposed Project; therefore, no new and/or refined mitigation measures are required.

Threshold (e) Conflict with any local policies or ordinances related to protecting biological resources, such as a tree preservation policy or ordinance.

The proposed Project would not conflict with any local policies or ordinances protecting biological resources. While the proposed Project would remove common vegetation found on-site, these biological elements do not have any legal protection and their removal would not constitute a significant impact under CEQA. The City does not have a tree protection ordinance. Therefore, no associated impacts would occur. The proposed Project is consistent with the development contemplated and analyzed in the 2010 RSP Final EIR and the 2016 RSPA Final SEIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would change the finding of less than significant impact under this threshold.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

There are no new potentially significant impacts associated with the proposed Project; therefore, no new and/or refined mitigation measures are required.

Threshold (f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

The project site is comprised of Planning Areas 113, 117, and portions of 110, 111, and 129, within the 2016 RSPA area. The project site is zoned for residential and is not included in a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. No impact relative to conservation plans would occur. No impacts to riparian habitat or other sensitive natural community listed in local or regional plans would occur. The proposed Project is consistent with the development contemplated and analyzed in the 2010 RSP Final EIR and the 2016 RSPA Final SEIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would change the finding of less than significant impact under this threshold.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. There are no new potentially significant impacts associated with the proposed Project; therefore, no new and/or refined mitigation measures are required.

Overall Biological Resources Impacts Conclusion

With regard to CEQA Section 21166 and CEQA Guidelines Section 15162(a), the changes proposed by the Project would not result in any new impacts, or increase the severity of the previously identified impacts, with respect to biological resources. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.5 Cultural Resources

The 2010 RSP Final EIR determined that potentially significant impacts would occur to cultural and paleontological resources. The 2016 RSPA Final SEIR did not evaluate the potential impacts to cultural resources, as the findings of the 2010 RSP Final EIR were determined to be applicable to the 2016 RSPA. Mitigation Measures CR-1 through CR-4 from the 2010 RSP Final EIR were found to reduce impacts to a less than significant level. Both prehistoric and historic archaeological resources identified in the 2010 RSP Final EIR are known to be located within the boundaries of several planning areas. According to Table 4.5-2, no resources are known to be located within Planning Areas 110, 111, 113, 117, or 129, which are the planning areas of which the project site is comprised. Therefore, Mitigation Measures CR-1 through CR-4 would not apply to the Project. PaleoServices at the San Diego Natural History Museum prepared a Paleontological Resources Memorandum for the Project in August 2024. The results of this memorandum are summarized herein and included as **Appendix D** to this Addendum.

Threshold (a) Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5; and

Threshold (b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.

Both prehistoric and historic archaeological resources identified in the 2010 RSP Final EIR are known to be located within the boundaries of several planning areas. The project site is located within Planning Areas 45, 46, 49a, 49c, 53, 54, and 60c of the 2010 RSP. Planning Area 60c was identified as a Planning Area which includes known cultural resources. Known cultural resources located within Planning Area 60c include Rialto Municipal Airport Structures (see Table 4.5-2 of the 2010 RSP Final EIR). The previous Rialto Municipal Airport ceased operations in 2014, and the airport has since been demolished and the land has undergone mass grading. As such, the previously identified known cultural resources are no longer present within the project site. Therefore, Mitigation Measures CR-1 through CR-4 do not apply to the proposed Project, and no additional mitigation is necessary.

No new impact relative to cultural resources or a substantial increase in the severity of a previously identified significant impact evaluated in the 2010 RSP Final EIR would occur. Furthermore, no new information of substantial importance that was not known and could not have been known at the time the 2010 RSP EIR was certified is available that would impact the prior finding of less than significant impact with mitigation under this threshold.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

The Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. Implementation of the Project would have a less than significant impact to historic and prehistoric archaeological resources. No new impact or a substantial increase in the severity of a previously identified significant impact evaluated in the 2010 and 2016 RSPA Final SEIRs would occur. Furthermore, no new information of substantial importance that was not known and could not have been known at the time the 2010 and 2016 RSPA Final SEIRs was certified that would impact the prior finding of less than significant impact with mitigation under this threshold is available.

Threshold (c) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature.

The 2016 RSPA Final SEIR concluded that the project site has both a low and undetermined probability of containing significant paleontological resources. As discussed in the 2016 RSPA Final SEIR and in accordance with the findings of the 2010 RSP Final EIR, implementation of Mitigation Measure **CR-5** is required on portions of the 2016 RSPA area located between Linden Avenue and the eastern 2010 RSP boundary. The project site is located east of Linden Avenue; therefore, Mitigation Measure **CR-5** is applicable. PaleoServices at the San Diego Natural History Museum prepared a Pre-construction Paleontological Field Survey for the Project in August 2024. The report concluded that there is a low risk of paleontological resources to be found on the project site. The report also concluded that the paleontological monitoring program is not recommended for the Project. Although not anticipated, the following standard conditions would be implemented in the unlikely event that fossils are unearthed during earthwork activities.

Standard Condition C-1: Upon discovery of an unearthed fossil, earthwork in the vicinity of the discovery shall immediately halt, and a qualified paleontologist should evaluate the discovery. Earthwork shall be diverted until the significance of the fossil discovery can be assessed by the qualified paleontologist. If the fossil discovery is deemed significant, the fossil shall be recovered using appropriate recovery techniques based on the type, size, and mode of preservation of the unearthed fossil. Earthwork may resume in the area of the fossil discovery once the fossil has been recovered, and the qualified paleontologist deems the site has been mitigated to the extent necessary. Additional earthwork following the fossil discovery may be monitored for paleontological resources on an as-needed basis, at the discretion of the qualified paleontologist.

Standard Condition C-2: Recovered fossils shall be prepared, identified, catalogued, and stored in a recognized professional repository along with associated field notes, photographs, and compiled fossil locality data. For projects in San Bernardino County, the recommended designated repository is the San Bernardino County Museum. Donation of the fossils should be accompanied by financial support for specimen storage. A final summary report should be completed that outlines the results of the mitigation program. This report should include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils. This report shall be submitted to appropriate agencies, as well as to the designated repository.

With adherence to these standard conditions, impacts would be less than significant, consistent with the findings of the 2016 RSPA Final SEIR. This would not be a new specific impact or an increase in the severity of an impact that was identified in the 2016 RSPA Final SEIR and would therefore be consistent with the effects of implementation of the 2016 RSPA Final SEIR and no further analysis is required. Furthermore,

no new information of substantial importance that was not known and could not have been known at the time the 2010 RSP Final EIR or 2016 RSPA Final SEIR were certified is available that would impact the prior finding of less than significant impact for the proposed Project.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

Mitigation Measure CR-5: Prior to the issuance of grading permits in that portion of the Specific Plan area located between Linden Avenue and the eastern project boundary (ie: Planning Area 6, 7, 8, 9, 28, 29, 45, 46, 47, 48, 49a, 49b, 49c, 50, 53, 54, 55, 56, 57, 58, 60c, 62, 63, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81), a paleontological field survey shall be conducted prior to development-related earthmoving activities to determine the paleontologic sensitivity of the Pleistocene eolian dune sands. This survey shall be conducted by a qualified vertebrae paleontologist with experience in regional geology. If this field survey results in a determination of a high paleontological sensitivity, a paleontologic monitoring program shall be implemented. This monitoring program shall be consistent with the provisions of CEQA and with the guidelines of the Society of Vertebrae Paleontology. If a monitoring program is found to be required and is implemented, monitoring may be reduced or eliminated if the sensitive deposits are determined upon exposure and examination by qualified paleontologic sensitivity, no program to mitigate adverse impacts to paleontologic resources will be necessary. This measure shall be implemented to the satisfaction of the City Development Services Director.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. There are no new potentially significant impacts associated with the proposed Project; therefore, no new and/or refined mitigation measures are required.

Threshold (d) Disturb any human remains, including those interred outside of formal cemeteries.

Per the findings of the 2010 RSP Final EIR, the project site is not located within a known or suspected cemetery and there are no known human remains within the project site.⁶ State law related to the discovery of human remains, specifically California Health and Safety Codes 7050.5 to 7055, provide guidance should human remains be discovered during construction. The likelihood of finding human remains is low and the resulting impact is considered less than significant. This finding is consistent with the findings made in the 2010 RSP Final EIR prepared for the 2010 RSP. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2010 RSP Final EIR was certified is available that would change the finding of less than significant impact under this threshold.

⁶ City of Rialto. (2010). Final Environmental Impact Report for the Renaissance Specific Plan, Rialto, California.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

There are no new potentially significant impacts associated with the proposed Project; therefore, no new and/or refined mitigation measures are required.

Overall Cultural Resources Impacts Conclusion

With regard to CEQA Section 21166 and CEQA Guidelines Section 15162(a), the changes proposed by the Project would not result in any new impacts, or increase the severity of the previously identified impacts, with respect to cultural resources. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.6 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?

Impacts related to energy were not formally analyzed in the 2016 RSPA Final SEIR because they were not on the State CEQA Guidelines' Appendix G checklist until January 1, 2019, which was subsequent to the certification of the 2016 RSPA Final SEIR. Although addenda do not need to consider new impact areas added to the CEQA Guidelines after the EIR was concluded, the current State CEQA Guidelines Appendix G checklist separate thresholds for energy are incorporated in this Addendum. The 2010 RSP Final EIR did include an analysis of the impacts on public services and utilities, which included electricity and natural gas. Specifically, the analysis was in Section 4.16, Utilities, of the 2010 RSP Final EIR, which determined that impacts to electricity and natural gas services would be less than significant. The 2016 RSPA Final SEIR evaluated the impacts to the 2016 RSPA and determined that aside from potential impacts related to water demand and stormwater, that there were no new or additional impacts related to utilities. The number of residential units to be developed with the Project is less than the number of units previously analyzed for the project site, so any energy-related impacts associated with the Project would be consistent with or less than those previously analyzed. Additionally, the Project would be required to comply with Title 24 Building Energy Efficiency Standards, resulting in more energy-efficient units than previously analyzed.

Construction activities associated with the Project are estimated to be completed within approximately 28 months. Fossil fuels used for construction vehicles and other energy-consuming equipment would be used during site preparation, grading, infrastructure improvements, building construction, and paving. Fuel energy consumed during construction would be temporary in nature and would not represent a significant demand on energy resources. Energy conservation would occur during construction through compliance with State requirements that equipment not in use for more than five minutes be turned off. Construction equipment would also 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 resources during construction. There are no unusual Project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or State. Impacts would be less than significant in this regard.

The energy consumption associated with Project operations would occur from building energy use (electricity and natural gas), water use, and transportation-related fuel use. As noted above, 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. Furthermore, the electricity provider, Southern California Edison (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 60 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. The Project would adhere to all federal, State, and local requirements for energy efficiency, including the Title 24 standards.

The Project would include development of residential uses and a private recreation center. The project site currently features vacant, previously disturbed land. The proposed development would be consistent with the existing land use designation and zoning for the project site. As such, the proposed development was anticipated upon approval of the 2016 RSPA EIR, and it is anticipated that the Project would be adequately served by existing providers. The Project would be consistent with the findings of the 2016 RSPA EIR.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation is required.

2016 RSPA Final SEIR Mitigation Measures

No mitigation is required.

Project Mitigation Measures

No mitigation is required.

Conclusion

No new impact relative to energy or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would impact the prior finding of no significant impact to energy.

Overall Energy Impacts Conclusion

With regard to CEQA Section 21166 and CEQA Guidelines Section 15162(a), the changes proposed by the Project would not result in any new impacts, or increase the severity of the previously identified impacts, with respect to energy. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.7 Geology and Soils

The 2016 RSPA Final SEIR did not evaluate the potential impacts to geology and soils, as the findings of the 2010 RSP Final EIR were determined to be applicable to the 2016 RSPA.

Threshold (a) Result in risk of loss, injury, or death involving:

- i. **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on the substantial evidence of a known fault.**
- ii. **Strong seismic ground-shaking.**
- iii. **Seismic-related ground failure, including liquefaction.**
- iv. **Landslides.**

The 2010 RSP Final EIR concluded that the 2010 RSP would be subject to strong ground shaking during a large earthquake event occurring on the San Andreas, San Jacinto, and Cucamonga faults, or any unknown faults in the vicinity. Horizontal accelerations likely to be experienced on the project site were analyzed in the 2010 RSP Final EIR using computer models that considered such factors as the nature of nearby active faults, their historic seismicity, their distance to the site, and response characteristics specific to the site. The results of the analysis indicated that the peak horizontal ground acceleration with a 10 percent probability of being exceeded in 50 years is estimated to be between 0.86g and 0.96g. This was identified in the 2010 RSP Final EIR as a potentially significant impact that would be reduced to a less than significant impact with the incorporation of Mitigation Measures **GS-2** through **GS-6** of the 2010 RSP Final EIR.

As determined in 2010 RSP Final EIR, the project site is not located in an Alquist-Priolo Earthquake Fault Zone. The nearest known active fault is the San Jacinto Fault Zone, located approximately 1.8 miles east of the project site. Therefore, the potential for fault rupture at the site is considered very low. Further, all proposed structures would be designed to resist structural collapse and thereby provide reasonable protection from serious injury, catastrophic property damage, and loss of life. The proposed development would be designed in accordance with the requirements of the 2022 edition of the California Building Code (CBC). The CBC provides procedures for earthquake-resistant structural design that include considerations for on-site soil conditions, occupancy, and the configuration of the structure including the structural system and height.

The proposed Project shall implement mitigation measures as identified in the 2010 RSP Final EIR to avoid potentially significant seismic impacts. Mitigation Measures **GS-2** through **GS-6** are applicable to the proposed Project.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

Mitigation Measure GS-2: Prior to the issuance of building permits for each planning area of the project, the project applicant or its designee shall demonstrate that all occupied or inhabited structures will be able to withstand a horizontal seismic acceleration of 0.96g. Specific design-level geotechnical reports shall be prepared by a State of California Certified Engineering Geologist for planning areas within the Specific Plan to determine that structures within those

areas meet required design criteria. This measure shall be implemented to the satisfaction of the City Development Services Director.

Mitigation Measure GS-3: Prior to the issuance of building permits for each planning area, the project applicant or its designee shall demonstrate that all occupied or inhabited structures will be constructed to the standards outlined in the Uniform Building Code, the California Building Code, the design-level geotechnical reports, and/or other such standard as identified and required by the City. This measure shall be implemented to the satisfaction of the City Development Services Director.

Mitigation Measure GS-4: During construction and excavation activities on the project site, all temporary slopes (i.e., excavations and trenching) shall be adequately shored and/or flattened to a shallower gradient to lessen the possibility of failure. All Cal-OSHA regulations shall be implemented for excavations that will be entered by people. All excavations will be open only as long as is necessary and shall be backfilled immediately upon completion of work. This measure shall be implemented to the satisfaction of the City Development Services Director.

Mitigation Measure GS-5: Prior to the issuance of grading permits, the project applicant or its designee shall present an Erosion Control Plan (ECP) designed to lessen the impacts of erosion during construction. This plan shall comply with all applicable grading codes and water quality protection protocols. This plan shall be implemented during site construction. This measure shall be implemented to the satisfaction of the City Development Services Director.

Mitigation Measure GS-6: During grading and development of the project site, all oversized material (larger than 12 inches in largest dimension) shall be handled as recommended in the project geotechnical reports. This material may be placed in deeper fills, nonstructural areas, or disposed of offsite.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

With implementation of measures identified above, significant impacts would be mitigated to a less than significant level. This significance finding is consistent with the finding of less than significant impact with mitigation identified in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would change the finding of less than significant impact under this threshold.

Threshold (b) Result in substantial erosion or loss of topsoil; and

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

Threshold (d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property.

The 2010 RSP Final EIR concluded that impacts from naturally occurring landslides are considered negligible but that manufactured slopes can present significant hazards if not properly engineered and constructed. Therefore, impacts related to slope failure from manufactured slopes are considered potentially significant. Slope failure can also occur on temporary slopes, which are formed during excavations of soil for utility lines, trenches, etc. Because of the project site's loose, coarse, and dry soil, the hazard presented to people working in and around these excavations can be significant. For this reason, and to consider a worst-case scenario, impacts related to slope failure from temporary slopes were considered potentially significant in the 2010 RSP Final EIR.

The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. The 2010 RSP Final EIR also concluded that on-site soils could cause hazards relative to uneven compression upon loading of structures, susceptibility to erosion during ground disturbance (construction), and handling of oversized materials excavated during construction.⁷ Implementation of Mitigation Measures **GS-2** through **GS-6**, mitigates for potentially significant impacts to faulting, seismicity, and soils. With implementation of Mitigation Measures **GS-2** through **GS-6**, impacts on the proposed Project from geology and soils constraints would be less than significant. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would change the finding of less than significant impact under these thresholds.

Threshold (e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewer are not available for the disposal of wastewater.

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

No new impact relative to geology and soils or a substantial increase in the severity of a previously identified significant impact evaluated in the 2010 RSP Final EIR would occur with implementation of the proposed Project. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that changes the impact determination.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

Mitigation Measures **GS-2** through **GS-6** are included above, under Threshold (a).

2016 RSPA Final SEIR Mitigation Measures

⁷ City of Rialto. Final Environmental Impact Report for the Renaissance Specific Plan, Rialto, California. July 28, 2010; revised October 26, 2010. p. 4.6-8.

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Overall Geology and Soils Impact Conclusion

No significant impacts to geology and soils are identified in the 2010 RSP Final EIR. The Project is located within the boundaries of the 2016 RSPA area; therefore, no new and/or refined mitigation measures are required for issues related to geology and soils.

With regard to CEQA Section 21166 and CEQA Guidelines Section 15162(a), the changes proposed by the Project would not result in any new impacts, or increase the severity of the previously identified impacts, with respect to geology and soils. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.8 Greenhouse Gas Emissions (Climate Change)

The 2010 RSP Final EIR identifies the potential for impacts related to climate change as a result of 2010 RSP implementation. The 2016 RSPA increased the business and commercial uses from 9.3 million square feet in the 2010 RSP, to 10.7 million square feet, and decreased the residential uses from 1,667 units to 1,262 units. The 2016 RSPA Final SEIR identifies the potential for impacts related to climate change as a result of Specific Plan implementation. The climate change analysis herein evaluates the potential impacts associated with the development of the proposed Project compared to the maximum allowable development allowed by the 2016 RSPA.

Background

Global climate change refers to changes in average climatic conditions on Earth as a whole, including temperature, wind patterns and precipitation. Global temperatures are moderated by naturally occurring atmospheric gases, including water vapor, carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O), as well as hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). These “greenhouse” gases (GHGs) allow solar radiation (sunlight) into the Earth’s atmosphere but prevent radiative heat from escaping, thus warming the Earth’s atmosphere. GHGs are emitted by both natural processes and human activities. Concentrations of GHG have increased in the atmosphere since the industrial revolution. Human activities that generate GHG emissions include combustion of fossil fuels (CO₂ and N₂O); natural gas generated from landfills, fermentation of manure and cattle farming (CH₄); and industrial processes such as nylon and nitric acid production (N₂O).

GHGs have varying global warming potential (GWP). The GWP is the potential of a gas or aerosol to trap heat in the atmosphere; it is the “cumulative radiative forcing effect of a gas over a specified time horizon resulting from the emission of a unit mass of gas relative to a reference gas.” The reference gas for GWP is CO₂; therefore, CO₂ has a GWP factor of 1. The other main GHGs that have been attributed to human activity include CH₄, which has a GWP factor of 28, and N₂O, which has a GWP factor of 265. When accounting for GHGs, all types of GHG emissions are expressed in terms of CO₂ equivalents (CO₂e) and are typically quantified in metric tons (MT) or million metric tons (MMT).

Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, established a State goal of reducing GHG emissions to 1990 levels by the year 2020, which would require a reduction of approximately 173 MMT net CO₂e below “business as usual” emission levels. Senate Bill (SB) 97, a companion bill, directed the California Natural Resources Agency (Resources Agency) to certify and adopt guidelines for the mitigation of GHGs or the effects of GHG emissions. SB 97 was the State Legislature’s directive to the Resources Agency to specifically establish that GHG emissions and their impacts are appropriate subjects for CEQA analysis. Executive Order (EO) S-3-05 was enacted in June 2005 and calls for an 80 percent reduction below 1990 levels by 2050. EO B-30-15 was enacted in April 2015 and establishes an interim GHG emission reduction goal for the State to reduce GHG emissions to 40 percent below 1990 levels by the year 2030. Additionally, AB 1279 sets goal for carbon neutrality and to reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045.

SCAQMD Thresholds

The South Coast Air Quality Management District (SCAQMD) formed a GHG California Environmental Quality Act (CEQA) Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. As of the last Working Group meeting (Meeting #15) held in September 2010, the SCAQMD is proposing to adopt a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency.

With the tiered approach, the Project is compared with 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. The SCAQMD has adopted a threshold of 10,000 metric tons of CO₂e (MTCO₂e) per year for industrial projects and 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 this 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.

Threshold (a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

Compliance with climate change and air quality mitigation measures, along with the incorporation of project recommendations, would reduce GHG emissions generated by land uses and related infrastructure improvements proposed in the Specific Plan. This reduction in emissions to meet the goal of AB 32 (i.e., greater than a 28 percent reduction in GHG emissions from business as usual conditions) cannot be fully assured due to uncertainties in the implementation of federal, State, and local programs to meet the goal established under AB 32 that are also relied on by the Specific Plan to meet the reduction target. Therefore, the 2010 RSP Final EIR and 2016 RSPA Final SEIR determined that impacts to global climate change from the Specific Plan were cumulatively significant and unavoidable.

The Project proposes 292 units, which is less than the previously approved 398 units. Accordingly, the Project would generate fewer trips than assumed for the project site in the 2016 RSPA Final SEIR. Allowable development of the site under the 2016 RSPA would include up to 398 units, while the Project proposes 292 units with a private recreation area. Total GHG emissions associated with the 2016 RSPA Project and proposed Project are summarized in **Table 8: Greenhouse Gas Emissions**. As shown in **Table 9**, the 2016 RSPA Project and proposed Project would generate approximately 5,813 MTCO₂e per year and 3,944 MTCO₂e per year, respectively, from both construction and operations. Therefore, the proposed Project would generate approximately 1,869 MTCO₂e per year less than the 2016 RSPA Project.

Notwithstanding, Project-related GHG emissions would exceed the 3,000 MTCO₂e per year threshold. The Project would be subject to mitigation measures implemented in the 2010 RSP Final EIR and 2016 RSPA Final SEIR; refer to *Mitigation Program* section below. However, GHG emissions would remain above the 3,000 MTCO₂e per year threshold. Consistent with the 2016 RSPA Final SEIR findings, GHG emissions would be significant and unavoidable.

Table 8: Greenhouse Gas Emissions		
Emissions Source	MTCO₂e per Year	
	2016 RSPA Project	Proposed Project
Construction Amortized Over 30 Years ¹	106	76
Area Source	76	69
Energy	1,478	890
Mobile	3,972	2,779
Waste	114	86

Emissions Source	MTCO ₂ e per Year	
	2016 RSPA Project	Proposed Project
Water and Wastewater	67	43
Total Project Emissions	5,813	3,944
<i>Threshold</i>	3,000	3,000
Exceeds Threshold?	Yes	Yes
1. The amortization period of 30-years is based on the standard assumption of the South Coast Air Quality Management District (South Coast Air Quality Management District, <i>Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13, August 26, 2009</i>).		

Mitigation Program

2016 RSPA Final SEIR Mitigation Measures

None identified in the 2016 RSPA Final SEIR.

2010 RSP Final EIR Mitigation Measures

The 2010 RSP Final EIR includes measures to reduce potential impacts associated the implementation of the Renaissance 2010 RSP. The following measures are applicable to the proposed Project.

According to the 2010 RSP Final EIR, implementation of Mitigation Measures **AQ-2, AQ-3, AQ-4, AQ-6, AQ-10** and **CC-1, CC-2, CC-3, CC-4, and CC-5** would reduce but not avoid significant impacts related to GHG emissions.

Mitigation Measures **AQ-2, AQ-3, AQ-4, AQ-6, AQ-10** and the following measures are applicable to the proposed Project.

Mitigation Measure CC-1: Homes and businesses will exceed the 2008 Standards for Title 24 Part 6 energy efficiency standards by at least 10 percent.

Mitigation Measure CC-2: Where appliances are offered by homebuilders, Energy Star appliances will be installed.

Mitigation Measure CC-3: The proposed project will comply with any applicable local Climate Action Plan or mitigation program for the reduction of GHGs adopted by the City of Rialto or the County of San Bernardino that is adopted prior to the issuance of building permits for subsequent project phases.

Mitigation Measure CC-4: The proposed project shall promote the use of alternative fuel technologies for construction vehicles by including language in construction bid specifications and weighting the use of alternative fuel technologies in the selection of construction contractors.

Mitigation Measure CC-5: Throughout construction, the proposed project shall maintain a centralized information repository for available recycled building materials. Recycled building materials shall be incorporated where practicable.

Project Mitigation Measures

No mitigation measures are required.

Conclusion

Consistent with the 2016 RSPA Final SEIR findings, GHG emissions would be significant and unavoidable. No new impacts or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would impact the prior finding of significant and unavoidable impact under this issue area.

Threshold (b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Regional Transportation Plan/Sustainable Communities Strategy Consistency

The *2024 – 2050 Regional Transportation Plan/Sustainable Communities Strategy* (Connect SoCal) is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. Connect SoCal embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, tribal governments, nonprofit organizations, businesses, and local stakeholders in the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. Under SB 375, SCAG's GHG emissions goal is to reduce GHG emissions in the region by eight percent below 2005 levels by 2020 and by 19 percent below 2005 levels by 2035. GHG emission targets for the years 2020 and 2035 are intended to help achieve significant GHG reductions from changes to land use patterns and improved transportation networks in support of the State's climate goals.

Connect SoCal is supported by a combination of transportation and land use strategies that help the region achieve State GHG emissions reduction goals and Federal Clean Air Act (FCAA) requirements, increased housing production, improved equity and resilience, the preservation of natural lands, improvement of public health, increased transportation safety, support for the region's vital goods movement industries and more efficient use of resources. GHG emissions resulting from development-related mobile sources are the most potent source of GHG emissions, and therefore, Project comparison to Connect SoCal is an appropriate indicator of whether the Project would inhibit the post-2020 GHG reduction goals promulgated by the State. The Project's consistency with applicable Connect SoCal goals is provided in **Table 9: 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy Consistency**.

Compliance with applicable State standards would ensure consistency with State and regional GHG reduction planning efforts. As shown in **Table 10**, the proposed Project would be consistent with the stated goals of Connect SoCal. Therefore, the proposed Project would not result in any significant impacts or interfere with SCAG's ability to achieve the region's post-2020 mobile source GHG reduction targets.

Table 9: 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy Consistency	
SCAG Goals	Compliance
Mobility: Build and maintain an integrated multimodal transportation network	
Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions	N/A. This is not a project-specific policy and is therefore not applicable.
Ensure that reliable, accessible, affordable, and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities	N/A. This is not a project-specific policy and is therefore not applicable.
Support planning for people of all ages, abilities, and backgrounds	N/A. This is not a project-specific policy and is therefore not applicable.
Communities: Develop, connect, and sustain communities that are livable and thriving	
Create human-centered communities in urban, suburban, and rural settings to increase mobility options and reduce travel distances	Consistent. The Project would provide residential uses in a suburban area near transit services. The Project Site is located near OmniTrans route 10, 22, and 312, which operates between the cities of Fontana and San Bernardino along Baseline Road, between Rialto and Colton along Renaissance Parkway, and San Bernardino and Fontana along Renaissance Parkway and Linden Avenue, respectively. Thus, the proposed Project would enhance mobility options and decrease travel distances.
Produce and preserve diverse housing types in an effort to improve affordability, accessibility, and opportunities for all households	Consistent. The Project would develop 292 residential units in a suburban area well-served by transit.
Environment: Create a healthy region for the people of today and tomorrow	
Develop communities that are resilient and can mitigate, adapt to, and respond to chronic and acute stresses and disruptions, such as climate change	Consistent. As discussed in Section 4.3 Air Quality , the Project would not exceed SCAQMD’s regional or localized thresholds. Based on the Friant Ranch decision, projects that do not exceed the SCAQMD’s localized significance thresholds (LSTs) would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and result in no criterial pollutant health impacts. In addition, the Project would comply with all applicable efficiency requirements. The Project is located approximately 45 miles inland from the Pacific Ocean and would therefore not be subject to risks associated with sea level rise. The Project would also provide central air conditioning in all units to offer relief from increased exterior surface temperatures. The Project thus promotes GHG-reduction strategies and is well suited to maintaining resiliency against the effects of climate change and associated health impacts.

Table 9: 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy Consistency	
SCAG Goals	Compliance
Integrate the region’s development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water	Consistent. Although the Project does not include transportation improvements, the Project Site is located within a suburban area near public transit services. The Project location would reduce trip lengths, which would reduce GHG and air quality emissions. The reduction of energy use, improvement of air quality, and promotion of more environmentally sustainable development are encouraged through the development of alternative transportation methods, green design techniques for buildings, and other energy-reducing techniques, such as compliance with the provisions of the California Building Energy Efficiency Standards and the CALGreen Code.
Conserve the region’s resources	Consistent. The proposed Project is located on land that is not designated for agricultural uses, natural resources, or conservation. Therefore, Project development would not result in a loss of the region’s resources.
Economy: Support a sustainable, efficient, and productive regional economic environment that provides opportunities for all people in the region	
Improve access to jobs and educational resources	Consistent. The project site is in close proximity to transit that would provide residents easy access to jobs and services. In addition, the project site is near commercial and industrial uses that would offer future employment opportunities.
Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities	N/A. This is not a project-specific policy and is therefore not applicable.
N/A = Not Applicable Source: Appendix B.	

California Air Resource Board Scoping Plan Consistency

CARB’s 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan), adopted December 15, 2022, 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. To achieve the targets of AB 1279, the 2022 Scoping Plan relies on existing and emerging fossil fuel alternatives and clean technologies, as well as carbon capture and storage. Specifically, the 2022 Scoping Plan focuses on zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high Global Warming Potential (GWP); providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen. The key elements of the 2022 CARB Scoping Plan focus on transportation. Specifically,

the 2022 Scoping Plan aims to rapidly move towards zero-emission transportation (i.e., electrifying cars, buses, trains, and trucks), which constitutes California’s single largest source of GHGs. The regulations that impact the transportation sector are adopted and enforced by CARB on vehicle manufacturers and are outside the jurisdiction and control of local governments. The 2022 Scoping Plan accelerates development of new regulations as well as amendments to strengthen regulations and programs already in place. As shown in **Table 10: Project Consistency with the CARB 2022 Scoping Plan**, the Project is consistent with applicable strategies.

Table 10: Project Consistency with the CARB 2022 Scoping Plan	
Action	Consistency
GHG Emissions Reductions Relative to the SB 32 Target	
40% Below 1990 levels by 2030.	Consistent. The Project would comply with the Title 24, Part 6 building energy requirements along with other local and State initiatives that aim to achieve the 40% below 1990 levels by 2030 goal. This would be ensured through the City’s existing development permitting process. Further, 2010 RSP Final EIR Mitigation Measure CC-2 supports the use of Energy Star appliances to further reduce GHG emissions.
Smart Growth/Vehicle Miles Traveled VMT	
VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045.	Consistent. As noted in the Traffic Study prepared for the Project, the Project would result in a less than significant VMT impact than land uses assumed for the project site in the RSPA. The Project would be consistent with SB 375 and its VMT reduction goals, as well as the GHG and transportation goals of the 2024-2050 RTP/SCS.
Light-Duty Vehicle (LDV) Zero-Emission Vehicles (ZEVs)	
100% of LDV sales are ZEV by 2035.	Consistent. The proposed Project would be designed and constructed in accordance with the Title 24 Part 6 and Part 11 requirements, which includes ZEV designated parking spaces and charging stations.
Truck ZEVs	
100% of medium-duty (MDV)/HDC sales are ZEV by 2040 (AB 74 University of California Institute of Transportation Studies [ITS] report).	Consistent. While the Project would not generate substantial medium- and heavy-duty truck traffic, it would not impede the advancement of cleaner trucks over time.
Electricity Generation	
Sector GHG target of 38 million metric tons of carbon dioxide equivalent (MTCO _{2e}) in 2030 and 30 MTCO _{2e} in 2035. Retail sales load coverage 20 gigawatts (GW) of offshore wind by 2045. Meet increased demand for electrification without new fossil gas-fired resources.	Consistent. The Project would comply with Title 24, Part 6 building requirements, including renewable energy generation requirements as well as improved insulation reducing energy consumption.

Table 10: Project Consistency with the CARB 2022 Scoping Plan	
Action	Consistency
New Residential and Commercial Buildings	
All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030.	Consistent. The Project would comply with the Title 24, Part 6 building energy requirements and would implement Mitigation Measure CC-2 , which requires installation of Energy Star appliances where appliances are offered by homebuilders.
Construction Equipment	
25% of energy demand electrified by 2030 and 75% electrified by 2045.	Consistent. Through City permitting the proposed Project would be required to use construction equipment that are registered by CARB and meet CARB’s standards. CARB sets its standards in alignment with the State’s goal of reducing energy demand by 25% in 2030 and 75% in 2045. Additionally, the Project would comply with Mitigation Measure CC-4 , which encourages the use of alternative fuel technologies for construction vehicles.
High GWP Potential Emissions	
Low GWP refrigerants introduced as building electrification increases, mitigating HFC emissions.	Consistent. The Project would comply with the Title 24, Part 6 building energy requirements, including use of low GWP refrigerants, which would be verified through the City’s existing development permitting process.
Source: Appendix B	

Consistency with the City of Rialto Climate Adaptation Plan

The City of Rialto Climate Adaptation Plan (Rialto CAP)⁸ 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 proposed Project would be consistent with the Rialto CAP through compliance with applicable energy efficiency standards. 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

⁸ City of Rialto. (2021). Rialto Climate Adaption Plan. <https://www.yourrialto.com/DocumentCenter/View/1761/Rialto-Climate-Adaptation-Draft-Plan-July-2021>.

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 cycle. The most recent 2022 standards went into effect January 1, 2023. The 2025 standards will be effective January 1, 2026.

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 operation and would not interfere with the State's GHG reduction goals. Additionally, The Project proposes 292 units, which is less than the previously approved 398 units. Accordingly, the Project would generate fewer trips than assumed for the project site in the 2016 RSPA Final SEIR.

It should be noted that 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. As noted above, future development projects (including the proposed Project) would be required to comply with the Building Code energy efficiency standards, which would minimize GHG emissions.

The Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for reducing the emissions of GHGs, and would not impede implementation of the CARB Scoping Plan, or conflict with the policies of the CARB Scoping Plan or any other GHG reduction plan. Therefore, the impacts would be less than significant.

Mitigation Program

Mitigation Measures from the 2010 RSP Final EIR

The 2010 RSP Final EIR includes measures to reduce potential impacts associated the implementation of the Renaissance 2010 RSP. According to the 2010 RSP Final EIR, implementation of Mitigation Measures **AQ-2, AQ-3, AQ-4, AQ-6, AQ-10** and **CC-1, CC-2, CC-3, CC-4, and CC-5** would reduce but not avoid significant impacts related to GHG emissions.

Mitigation Measures from the 2016 RSPA Final SEIR

None identified in the 2016 RSPA Final SEIR.

Conclusion

The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. Allowable development of the site under the 2016 RSPA could include up to 398 units. As such, the proposed development (292 units) would generate fewer trips and generate less emissions than assumed for the project site in the 2016 RSPA Final SEIR. Accordingly, GHG impacts associated with the proposed Project would be less than those assumed for the project site in the 2016 RSPA Final SEIR. Impacts associated with the proposed Project have been contemplated in the 2010 RSP Final EIR and the 2016 RSPA Final SEIR and no further analysis is required. There are no new

potentially significant impacts associated with the proposed Project; therefore, no new and/or refined mitigation measures are required.

Overall Greenhouse Gas Emissions Impact Conclusion

With regard to CEQA Section 21166 and CEQA Guidelines Section 15162(a), the changes proposed by the proposed Project would not result in any new impacts, or increase the severity of the previously identified impacts, with respect to GHG. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.9 Hazards and Hazardous Materials

The scope of discussion and findings herein are based on the Radius Map Report prepared by EDR (April 2025) and included as **Appendix E**. In addition, hazardous material impacts from the 2010 RSP were addressed in the 2010 RSP Final EIR. The 2016 RSPA Final SEIR found impacts from hazardous materials to be less than significant. Applicable mitigation measures for hazardous materials for the proposed Project from the 2010 RSP Final EIR and 2016 RSPA Final SEIR are described below.

Threshold (a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;

Threshold (b) 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; and

Threshold (d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and as a result, would create a significant hazard to the public or the environment.

The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. The 2010 RSP Final EIR found that there was soil contamination on the 2010 RSP site due to the previous use as an airport. The concentrations of identified chemicals in soils exceeded the California Human Health Screening Levels (CHHSLs) and Regional Screening Levels (RSLs) for residential and industrial standards. These chemicals with elevated concentration levels have high potential to cause serious threats to the human health and the surrounding environments. Therefore, without remediation the existing hazardous chemicals and materials within the project site could result in a potentially significant impact. With implementation of Mitigation Measure HAZ-1, the impacts from hazardous materials were found to be less than significant.

The 2010 RSP Final EIR concluded that once constructed, hazardous materials in the RSP area would be limited to those typically associated with residences and industrial/commercial operations. These include household fertilizers, pesticides, paints, solvents, household cleaners, petroleum products, commercial cleaners, pesticides, paints and solvents. Given these materials would be used in very limited quantities, they are not considered a hazard to the public. Adherence to federal, State and local regulations regarding these substances reduced the potential impacts to a less than significant level.

The 2016 Final SEIR found that potential impacts related to the presence of contaminated soils and disposal of contaminated soils during construction would be mitigated to a less than significant level with implementation of mitigation measures identified in the 2010 Final EIR. The 2016 Final SEIR also determined that implementation of the 2016 RSPA would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts were determined to be less than significant.

Records Review

Regulatory Records Review

The project site was identified in the EDR report as it was located on a portion of the former Rialto Airport. Nearby facility cases that were listed within a 0.25 miles radius, up-gradient of the project site are summarized below in **Table 11: Site Listings**.

Table 11: Site Listings		
Listing Name	Address/Location	Summary of Information
Rialto Municipal Airport Property	Rialto, CA	This facility is associated with the former Rialto Municipal Airport. The project site includes a small portion of this former airport. Operations of the airport ceased in 2014. The site is listed in the PFAS ECHO and CERS databases. However, no violations were noted under the EDR Radius Map.
Cinemark Renaissance Marketplace & XD	1355 Renaissance Parkway	The facility is associated with Cinemark Bistro Renaissance Marketplace and XD. The site is listed in CERS database. Violation associated with the site includes failure to complete electronically submit a site map with all required content. The violation noted that the most recent site map submitted via CERS is incomplete and missing required elements, including orientation, infrastructure, and emergency features. This may indicate inadequate facility documentation and emergency planning. An updated, comprehensive map should be submitted to ensure all hazardous material handling, storage areas, and emergency response measures are clearly identified, which is critical for environmental and health safety compliance.
Five Below	1275 Renaissance Parkway	This facility is associated with Five Below #1331. The site is listed on the CERS and CERS HAZ WASTE databases. Violations regarding this site are associated with the Hazardous Waste Generator Program. The facility is missing an established business plan and is missing a CUPA hazardous waste generator permit.
Amazon.com Services	1600 N. Linden Avenue	The facility is associated with the Amazon.com warehouse. The site is listed under FINDS, RCRA LQG, E MANIFEST, CERS HAZ WASTE, CERS TANKS, EMI, HWTS, HAZNET, HAULERS, NPDES, SAN BERN CO., PERMIT, and CIWQS databases. Violations regarding this site are associated with Failure to maintain a complete copy of the SPCC Plan.

In addition, there are several cases identified and located approximately 1 to 1.5 miles northwest of the project site which are contributing or potentially contributing to a regional groundwater contamination plume. A plume of VOC and perchlorate-impacted groundwater extends southeast from these various facilities, beneath the project site and is a couple of miles in length. According to the State Water resources Board GeoTracker database (<http://geotracker.waterboards.ca.gov/> accessed June 30, 2025), the plume is approximately 866 feet below ground surface. Based on the depth of the plume and the identification of numerous responsible parties for this regional groundwater contamination issue, this plume is considered unlikely to cause significant impacts to future site occupants, or environmental-related obligations (i.e. environmental regulatory agency requirements) for the project site. Therefore, the project site is suitable for the proposed residential use. As discussed above, the 2010 RSP Final EIR found that with implementation of Mitigation Measure HAZ-1, the impact from hazardous materials would be less than significant.

Conclusion

In conclusion, construction of the proposed Project would not result in significant impacts related to hazards and hazardous materials. The Project does not involve the routine transport, use, or disposal of hazardous materials, nor is it located on or near a site listed as a hazardous materials cleanup site. No conditions are present that would pose a risk to future residents from past or present hazardous materials

use. Therefore, implementation of the proposed Project would not result in new or more severe impacts related to hazards and hazardous materials beyond those previously evaluated.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Threshold (c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. The 2010 RSP Final EIR concluded there are no schools located within 0.25-mile of the project site and there are currently no schools within 0.25-mile radius of the project site; therefore, the project would not emit hazardous materials within one-quarter mile of an existing or proposed school. The 2010 RSP Final EIR also determined that as a residential development, the proposed Project is not expected to generate hazardous emissions or use hazardous materials. Any future school developed within the surrounding area will be subject to the oversight of the DTSC, as required by State law. New school sites are required to be free of contamination or, if the properties were previously contaminated, they must be cleaned up under DTSC's oversight. Therefore, no associated impacts would occur. Accordingly, no new impact or a substantial increase in the severity of a previously identified significant impact evaluated in the 2010 RSP Final EIR or 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2010 RSP Final EIR or 2016 RSPA Final SEIR were certified is available that would change the impact finding.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Threshold (e) For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard for people residing or working the project area; and

Threshold (f) For a project located within the vicinity of a private airstrip, result in a safety hazard for people residing or working the project area.

The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. The 2010 RSP Final EIR concluded that there were no impacts related to airport safety once the Rialto Municipal Airport was closed. The Rialto Municipal Airport, which was located within portions of the project site, closed in September 2014 and has since been demolished. The 2010 RSP envisioned that this airport would be closed as development occurs within the area; therefore, no impact would result. Accordingly, no new impact or a substantial increase in the severity of a previously identified significant impact evaluated in the 2010 RSP Final EIR or 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2010 RSP Final EIR or 2016 RSPA Final SEIR were certified is available that would change the impact finding.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

There are no new potentially significant impacts associated with the proposed Project; therefore, no new and/or refined mitigation measures are required.

Threshold (g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. The 2010 RSP Final EIR concluded the 2010 RSP is a typical mixed use project that would not impair or interfere with the implementation of emergency response plans or the activities of emergency responders. Therefore, the proposed Project would not result in impacts regarding an adopted emergency response or evacuation plan. Primary access to all major roads would be maintained during construction of the proposed Project. Therefore, no associated impacts would occur. Accordingly, no new impact or a substantial increase in the severity of a previously identified significant impact evaluated in the 2010 RSP Final EIR or 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2010 RSP Final EIR or 2016 RSPA Final SEIR were certified is available that would change the impact finding.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

There are no new potentially significant impacts associated with the proposed Project; therefore, no new and/or refined mitigation measures are required.

Threshold (h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

The proposed Project would not expose people or structures to a risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. According to the Cal Fire *Fire Hazard Severity Zone Viewer*, the project site is not located within a Very High Severity Zone (VHSZ) within the Local Responsibility Area (LRA).⁹ Impacts related to wildland fires would not be significant. The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. Accordingly, no new impact or a substantial increase in the severity of a previously identified significant impact evaluated in the 2010 RSP Final EIR or 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2010 RSP Final EIR or 2016 RSPA Final SEIR were certified is available that would change the impact finding.

Mitigation Program***2010 RSP Final EIR Mitigation Measures***

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

There are no new potentially significant impacts associated with the proposed Project; therefore, no new and/or refined mitigation measures are required.

Overall Hazards-Related Impacts Conclusion

With regard to CEQA Section 21166 and CEQA Guidelines Section 15162(a), the changes proposed by the Project would not result in any new impacts, or increase the severity of the previously identified impacts, with respect to hazards and hazardous materials. Therefore, preparation of a subsequent environmental analysis is not warranted.

⁹ California Department of Forestry and Fire Protection (Cal Fire). (2024). Fire Hazard Severity Viewer. <https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/>. Accessed October 2024.

4.10 Hydrology and Water Quality

The scope of discussion and findings herein are based in part on the 2016 RSPA Final SEIR and Drainage Report prepared for the proposed Project by Kimley-Horn and Associates (August 2024) included as **Appendix F**.

Threshold (a) Violate any water quality standards or waste discharge requirements; and

Threshold (f) Otherwise substantially degrade water quality.

The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. The 2016 RSPA Final SEIR found hydrology and water quality impacts to be less than significant with the incorporation of mitigation to reduce impacts from grading and construction activities could cause soils and other pollutants to enter the storm drain system during heavy rains, which could degrade storm water quality at downstream locations. Implementation of Mitigation Measures **HYD-1** and **HYD-2** require coordination with the City of Rialto Public Works Department and Regional Water Quality Control Board (RWQCB) during design and construction of the proposed Project to ensure the Project is consistent with long range planning efforts. To minimize water quality impacts associated with the proposed Project, construction activities are required to comply with a Stormwater Pollution Prevention Plan (SWPPP) prepared consistent with the General Permit for Stormwater Discharge Associated with Construction Activity (Construction Activity General Permit) (as referenced in Mitigation Measure **HYD-2**).

The project site is generally flat, with a gentle slope of less than 2% and little vegetation. The existing topography generally sheetflows from the northwest corner of the project site to the southeast corner of the project site. Existing flows are directed toward existing basins that are located throughout the project site. Following construction, the Project would be divided into three drainage areas, which would be further divided into subareas that utilize curb and gutter and curb inlets to collect and convey runoff to the outfall locations. Each overall drainage area will utilize a proposed modular wetland system to treat the collected stormwater before discharging into the existing 60-inch reinforced concrete pipe (RCP) and eventually into Cactus Basin 4. Due to the increasing impervious area of the proposed Project, the runoff will be increased after the development. The proposed modular wetland systems will be utilized instead of infiltrating to help treat on-site stormwater runoff. Additional BMPs include catch basins full capture insert filters, landscaped self-treating areas, and roof runoff drains. The project suggests no infiltration but ensures full treatment of all stormwater runoff using the proposed bio-treatment devices. Project flows will be discharged into the existing 60" RCP public storm drainpipe, which continues downstream and ultimately outfalls into Cactus Basin 4. The project maintains consistency with the allowable discharge rates compared to the current condition.

As required by Mitigation Measure **HYD-3**, the proposed Project prepared a WQMP to manage storm water quality during operation. Compliance with the requirements would avoid or minimize any violations of water quality standards or waste discharge requirements. Water quality impacts are expected to remain less than significant.

Potentially significant impacts associated with storm water discharge requirements, and water quality, would be reduced to a level of less than significant with implementation of Mitigation Measures **HYD-1** through **HYD-4**.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

Mitigation Measure HYD-1: Prior to issuance of grading permits, the developers or their designees shall coordinate the design and obtain approval of all flood control and storm drain structures as identified in project hydrology studies. The developers or their designees shall provide evidence of this approval to the City Public Works Department. These improvements shall be consistent with any master planning efforts of the County to the satisfaction of the City Engineer.

Mitigation Measure HYD-2: The developers or their designees shall obtain a General Permit for Stormwater Discharge Associated with Construction Activity (Construction Activity General Permit). The developers or their designees shall provide a copy of this permit to the City Public Works Department prior to the issuance of grading permits.

Mitigation Measure HYD-3: Prior to the issuance of grading permits, the developers or their designees shall prepare a Water Quality Management Plan (WQMP) and an Erosion and Sediment Control Plan (ESCP) to implement the most appropriate BMPs and to prevent any significant removal and/or downstream deposition of soil from the project site during construction. The WQMP and ESCP shall contain provisions requiring that all erosion control measures and structures be maintained and repaired as needed for the life of the project. Prior to the issuance of a grading permit, the City Public Works Department, Engineering Division shall approve the WQMP and ESCP based on review and input by the RWQCB. At the request of the developer, the City Public Works Department may accept a Storm Water Pollution Prevention Plan (SWPPP) as a substitute for the ESCP as long as it fulfills the intent of this measure to an equivalent degree. The SWPPP or ESCP shall be prepared to the satisfaction of the City Public Works Department. The WQMP and ESCP or SWPPP shall include, but is not limited to, the following:

- a) Specify the timing of grading and construction to minimize soil exposure to winter rain periods experienced in southern California;
- b) Natural vegetation shall be retained on all areas that will not be disturbed for grading, except areas that must be cleared and revegetated as part of a fuel modification program;
- c) All slopes greater than five feet in height shall be evaluated to define the optimum length and steepness to minimize flow velocity and erosion potential. Lateral drainage collection systems shall be incorporated at the base of slopes, when determined appropriate, to transport flows in a controlled, non-erodible channel;
- d) Indicate where flows on the site can be diverted from denuded areas and carried in the natural channels on the site;
- e) Construct man-made channels to minimize runoff velocities;
- f) Disturbed areas shall be vegetated and mulched immediately after final grades have been established;
- g) Sediment traps, basins, or barriers (silt fences, hay bales, etc.) shall be established on the property to prevent the release of "first flush" urban pollutants, including sediment, from

- developed areas, including the emergency access roads. The design and location of these improvements shall be identified in the plan subject to review and approval by the City;
- h) Drainage facilities designed to transport flows shall be described and the adequacy of the channel shall be verified by City approval of a detailed drainage analysis;
 - i) An inspection and maintenance program shall be included to ensure that any erosion, which does occur either on or offsite as a result of the project, will be corrected through a remediation or restoration program within a time frame specified by the City;
 - j) Confirmed observations by the City of uncontrolled runoff being carried onsite will be grounds for suspension or revocation of any grading or building permit in process, or any discretionary permit subsequently applied for until the problem is resolved to the satisfaction of the City Public Works Department.

Mitigation Measure HYD-4: Prior to the issuance of building permits, graded but undeveloped land shall be maintained in a relatively weed-free condition and/or planted with interim landscaping within 180 days of completion of grading, unless building permits are obtained. This measure shall be implemented to the satisfaction of the Public Works Director.

Project Mitigation Measures

No mitigation is required.

Conclusion

Compliance with the requirements outlined in the WQMP would avoid or minimize any violations of water quality standards or waste discharge requirements. Implementation of the proposed Project would have a less than significant impact to water quality. No new impact relative to water quality or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Furthermore, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would impact the prior finding of less than significant impact with mitigation under this threshold.

Threshold (b) Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).

The 2010 RSP Final EIR indicated that the 2010 RSP would not use groundwater from beneath the site. Rather, water supplies would be brought in via existing water supply networks from non-contaminated sources outside of the 2010 RSP area. The 2016 RSPA Final SEIR stated that the 2016 RSPA would receive its water supply from three different water districts; the City of Rialto Water District, West Valley Water District and Fontana Water Company/San Gabriel Valley Water Company. The project site is located within the service area of the Fontana Water Company/San Gabriel Valley Water Company. The Fontana Water Company/San Gabriel Valley Water Company supply is produced from Lytle Creek surface flow, from groundwater wells in the Lytle Basin, Rialto Basin, Chino Basin, and No Man's Land. A portion of the water supply is purchased from Cucamonga Valley Water District. Water from the State Water Project (SWP) is purchased from the Inland Empire Utilities Agency and the San Bernardino Valley Municipal Water District. Fontana Water Company produces groundwater from thirty-eight wells located in the previously identified basins (Fontana Water Company Urban Water Management Plan, 2010). The use of

groundwater for the 2010 RSP project is discussed later in this Addendum under Utilities and Service Systems. As discussed in that section, the proposed Project would have sufficient water supplies (groundwater is one of the sources) available to serve the Project. In addition, the Project would result in additional impervious surfaces on site, but no more than previously analyzed in the 2016 RSPA Final SEIR. The 2016 RSPA Final SEIR determined that on-site storm drainage facilities serving future development projects including the proposed Project would be sized according to a required WQMP that will control and treat runoff. The Project would construct a modular wetland system which would treat runoff. Accordingly, the proposed Project would not significantly impact local groundwater recharge. Impacts would be less than significant.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. No new impact or a substantial increase in the severity of a previously identified significant impact evaluated in the Final 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would change the impact determination.

Threshold (c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site; and

Threshold (d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

As described above, the 2016 RSPA Final SEIR found hydrology and water quality impacts to be less than significant. The proposed Project would not substantially alter the existing drainage patterns of the site or vicinity and is consistent with the 2016 RSPA Master Plan of Drainage. The project site drains in a southeast direction. As previously addressed, the project site is located within a larger tributary of the San Bernardino County Flood Control District Cactus Basin System. The project site runoff sheet flows to the southeast toward Ayala Drive then discharges into Cactus Basin #4. This basin discharges into the Rialto Channel, which ultimately discharges into the Santa Ana River Channel. The project site does not include any streams or rivers, which could be altered by the proposed Project. In addition, Cactus Basin #4 would limit the release of storm water to downstream waterbodies; therefore, minimizing the potential for flooding to occur on-site or off-site. The Project is consistent with the allowable discharge compared to the existing condition. Therefore, impacts would be less than significant.

Mitigation Program***2010 RSP Final EIR Mitigation Measures***

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. No new impact or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would change the impact finding.

Threshold (e) Create or contribute runoff water, which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.

The 2016 RSPA Final SEIR determined that the planned drainage facilities for the 2016 RSPA were adequately sized to treat runoff water from the 2016 RSPA area and thus, would not create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide additional sources of polluted runoff. The Project would be required to comply with Mitigation Measure **HYD-5** and Mitigation Measure **HYD-6** which require compliance with NPDES Best Management Practices and proof of ongoing maintenance of drainage facilities. As previously addressed, the implementation of Mitigation Measures **HYD-1** and **HYD-2** require the preparation of a WQMP and SWPPP with an associated Erosion and Sediment Control Plan that details construction and post-construction measures to control surface runoff in a manner that is consistent with master planning efforts. Therefore, associated impacts are considered less than significant with mitigation incorporated. Accordingly, no new impact or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would change the impact finding.

Mitigation Program***2010 RSP Final EIR Mitigation Measures***

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

Mitigation Measure HYD-5: Prior to the issuance of occupancy permits, planting of developed land shall comply with the *NPDES Best Management Practices Construction Handbook Section 6.2* to the satisfaction of the City Engineer and/or Public Works Director as applicable.

Mitigation Measure HYD-6: Prior to issuance of the first occupancy permit, the developers or their designees shall provide proof to the Public Works Department that the onsite drainage

facilities will be maintained by the County, City, HOA, or equivalent. The developer must demonstrate that these facilities will be adequately maintained by an appropriate mechanism or organization, to the satisfaction of the City Public Works Department.

Project Mitigation Measures

No mitigation is required.

Conclusion

The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. No new impact or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would change the impact finding.

Threshold (g) Place housing/structures within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map; and

Threshold (h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows.

The 2010 RSP Final EIR indicated that the 2010 RSP is not located within a 100-year FEMA flood hazard area. No flood hazard would occur with Project implementation. Accordingly, no new impact or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would change the impact finding.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. No new impact or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would change the impact determination.

Threshold (i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

As discussed above, the 2010 RSP Final EIR indicated that the 2010 RSP is not located within a mapped 100-year floodplain. No reservoir dam structures are located within the vicinity of the project site. The proposed Project is not within a special flood hazard area identified by the Federal Emergency Management Agency (FEMA). The project site is classified as Zone X, which is an area of minimal flooding (**Appendix F**). Additionally, the Project would construct drainage improvements to reduce the risk of flood hazards. No associated flood hazard impacts would occur.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

No new impact or a substantial increase in the severity of a previously identified significant impact evaluated in the 2010 Final EIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would change the impact determination.

Threshold (j) Result in inundation by seiche, tsunami or mudflow.

The 2010 RSP Final EIR concluded there are no dams, reservoirs or large water bodies near the 2010 RSP and therefore, would not be impacted by seiche, tsunami or mudflow. The project site is located approximately 45 miles inland from the Pacific Ocean. Given the distance from the coast, the potential for the project site to be inundated by a large, catastrophic tsunami is extremely low. No steep slopes are located in the vicinity of the project site; therefore the risk of mudflow is insignificant. No associated impacts would occur. Accordingly, no new impact or a substantial increase in the severity of a previously identified significant impact evaluated in the 2010 Final EIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would change the impact finding.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. No new impact or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would change the impact determination.

Overall Hydrology and Water Quality Conclusion

With regard to CEQA Section 21166 and CEQA Guidelines Section 15162(a), the changes proposed by the Project would not result in any new impacts, or increase the severity of the previously identified impacts, with respect to hydrology and water quality. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.11 Land Use and Planning

Threshold a) Physically divide an established community; and

Threshold b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

The 2010 RSP Final EIR found that the 2010 RSP would not physically divide or separate neighborhoods within the established community or conflict with applicable land use plans, policies, or regulations, including the Southern California Association of Governments' (SCAG) Regional Transportation Plan (RTP) 2012-2035 Sustainable Communities Strategy (SCS) (adopted April 2012) and the City of Rialto General Plan (updated December 2010). The 2016 RSPA Final SEIR also concluded that although the 2016 RSPA was located within the 2010 RSP area, the land use redistribution included as a part of the 2016 RSPA was found to be inconsistent with land use designations and zoning for specific lots as defined within the RSP, but generally the same or very similar to what was proposed in the 2010 RSP plan. Further, the redistribution and relocation of the land uses associated with the 2016 RSPA was found to provide a more efficient land use concept and to better separate residential and non-residential uses for better land use compatibility. Per the 2010 RSP, the Project is not located within a habitat conservation plan or natural community's conservation plan. Thus, no land use conflicts were identified in the 2010 RSP Final EIR and potential impacts to land use and planning were not evaluated in the 2016 RSPA Final SEIR, as the findings of the 2010 RSP Final EIR were determined to be applicable to the 2016 RSPA.

The project site is comprised of Planning Areas 113, 117, and portions of 110, 111, and 129, within the 2016 RSPA area and is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. The 2016 RSPA increased the business and commercial uses from 9.3 million square feet in the 2010 RSP, to 10.7 million square feet, and decreased the residential uses from 1,667 units (149.5 acres) to 1,262 units (104.5 acres). The 2016 RSPA Final SEIR analysis assumed a total of 398 dwelling units for the portions of the planning areas that comprise the project site, which is more than the proposed 292 units. As described in the 2016 RSPA, the RSPA planning area was anticipated to build out over several years and under different owners. Thus modifications to the land were expected in order to respond to changes in roadway alignments, right-of-way widths, physical realities, density transfers, and new product types. The Project includes development proposed across portions of several planning areas with varied allowable dwelling units and dwelling units per acre. Accordingly, the Project includes changes to roadway alignments and housing types with varied densities that overlap the 2016 RSPA planning area boundaries. However, the project site is comprised of planning areas designated for residential uses. Further, the Project would have a net density of 11.9 dwelling units per acre (du/ac) and 292 dwelling units, which conforms with the analysis of allowable density assumed in the 2016 RSPA for the planning areas included in the proposed Project.

Accordingly, no new land use and planning impacts or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would impact the prior finding of no significant impact.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures were identified.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures were identified.

Project Mitigation Measures

No mitigation is required.

Overall Land Use Impacts Conclusion

No new impacts relative to adverse land use impacts or a substantial increase in the severity of a previously identified significant impact evaluated in the 2010 RSP Final EIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2010 RSP Final EIR was certified is available that would impact the prior finding of no significant impact.

With regard to CEQA Section 21166 and CEQA Guidelines Section 1162(a), the changes proposed by the Project would not result in any new impacts, or increase the severity of the previously identified impacts, with respect to land use and planning. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.12 Mineral Resources

Threshold a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; and

Threshold b) Result in the loss of availability of a locally important mineral resources recovery site delineated on a local general plan, specific plan, or other land use plan.

The 2010 RSP Final EIR determined impacts to mineral resources to be less than significant. The 2016 RSPA Final SEIR did not evaluate the potential impacts to mineral resources, as the findings of the 2010 RSP Final EIR were determined to be applicable to the 2016 RSPA. The 2010 RSP Final EIR found that the City of Rialto General Plan does not identify any regionally or locally important mineral resources within the 2010 RSP area. The Project is within the 2010 RSP area; therefore, the City of Rialto has not identified any regionally or locally important mineral resources within the proposed Project area. The Project would not remove any locally or regionally important mineral resources from production or preclude access to important mineral resources.

No new impact relative to mineral resources or substantial increase in the severity of a previously identified significant impact evaluated in the 2010 RSP Final EIR would occur with implementation of the proposed Project. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2010 RSP Final EIR was certified is available that would impact the prior finding of no significant impact to mineral resources.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures were identified.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures were identified.

Project Mitigation Measures

No mitigation is required.

Overall Mineral Resources Impacts Conclusion

The Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. There are no new potentially significant impacts associated with the Project; therefore, no new and/or refined mitigation measures are required for issues related to mineral resources. With regard to CEQA Section 21166 and CEQA Guidelines Section 15162(a), the changes proposed by the Project would not result in any new impacts, or increase the severity of the previously identified impacts, with respect to mineral resources. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.13 Noise

The 2016 RSPA Final SEIR identifies the potential for noise impacts as a result of 2016 RSPA implementation. Mitigation Measures were identified to reduce impacts during construction and operations. This analysis evaluates construction and operational noise and vibration impacts associated with the proposed Project. This analysis also addresses 2016 RSPA Final SEIR Mitigation Measures **NOI-3 (N-6 and N-7)** and **NOI-4**, as discussed below.

Mitigation Measure NOI-3: Prior to the issuance of any grading permit, the applicant shall demonstrate that the following mitigation measures have been incorporated into the project design or that the mitigation does not apply to the current development:

Mitigation Measure N-6: The City shall require that a noise impact analysis be prepared for all proposed residential subdivisions within the Specific Plan, and proposed commercial retail or business uses located adjacent to Alder Avenue, Baseline Road, SR-210, or adjacent to other sensitive on-site or off-site uses. Each noise impact analysis shall identify potential direct, project-related, transportation noise impacts and provide mitigation, if necessary, to reduce the traffic noise impacts as well as other onsite stationary noise impacts to within the City noise level standards of the Land Use Element of the Rialto General Plan (shown in Table 4.11-1 in the DEIR and repeated in Table 4.6-2 in this Recirculated Draft SEIR).

Mitigation Measure N-7: The City shall require that a vibration impact analysis be prepared for all proposed residential subdivisions within the Specific Plan and for any commercial or business developments located adjacent to existing or proposed vibration sensitive land uses. Each vibration impact analysis shall identify potential construction-related vibration impacts and provide mitigation, if necessary, to reduce the construction to within the County vibration level standards.

Mitigation Measure NOI-4: Prior to Certificate of Occupancy or City acceptance of the Public Parks (as applicable), the applicant shall demonstrate that required sound barriers have been constructed for the following Planning Areas:

2. For residential uses proposed in Sub-Areas 110, 116, and 113 with outdoor living areas (e.g., backyards/patios and balconies/decks) or recreational areas (e.g., barbecue area or children's playground) within 95 feet of the Linden Avenue centerline, prior to the occupancy of the residential units, outdoor living/recreational areas should be protected with a sound wall with a minimum height of 6 feet. The Development Services Director/Planning Division may also allow the applicant to prepare a site-specific noise study that demonstrates noise walls are not needed.

Regulatory Setting

City of Rialto General Plan

The City of Rialto General Plan (RGP) is a roadmap that encompasses the hopes, aspirations, values, and dreams of the community. The RGP specifies exterior noise guidelines for land uses in the Safety and Noise chapter. The City requires that new developments be designed to meet these guidelines.¹⁰ Noise compatibility can be achieved by avoiding the location of conflicting land uses adjacent to one another,

¹⁰ City of Rialto, *Rialto General Plan, Chapter 5, Safety and Noise*, December 2010.

incorporating buffers and noise control techniques including setbacks, landscaping, building transitions, site design, and building construction techniques. Selection of the appropriate noise control technique would vary depending on the level of noise that needs to be reduced as well as the location and intended land use. RGP policies that directly address reducing and avoiding noise or vibration impacts include the following:

Goal 5-10: Minimize the impact of point source and ambient noise levels throughout the community.

- Policy 5-10.1: Revise the City's noise ordinance to address ongoing noise issues by using quantitative noise limits where appropriate and establishing comprehensive noise control measures.
- Policy 5-10.2: Consider noise impacts as part of the development review process, particularly the location of parking, ingress/egress/loading, and refuse collection areas relative to surrounding residential development and other noise-sensitive land uses.
- Policy 5-10.3: Ensure that acceptable noise levels are maintained near schools, hospitals, and other noise sensitive areas in accordance with the RMC (Rialto Municipal Code) and noise standards contained in Exhibit 5-5.
- Policy 5-10.4: Limit the hours of operation at all noise generation sources that are adjacent to noise-sensitive areas.
- Policy 5-10.5: Require all exterior noise sources (construction operations, air compressors, pumps, fans and leaf blowers) to use available noise suppression devices and techniques to reduce exterior noise to acceptable levels that are compatible with adjacent land uses.

Goal 5-11: Minimize the impacts of transportation-related noise.

- Policy 5-11.1: Work with responsible Federal and State agencies to minimize the impact of transportation-related noise, including noise associated with freeways, major arterials, and Metrolink and other rail lines.
- Policy 5-11.2: Require development which is, or will be, affected by railroad noise to include appropriate measures to minimize adverse noise effects on residents and business persons.
- Policy 5-11.3: Require development of truck-intensive uses to minimize noise impacts on adjacent uses through appropriate site design.
- Policy 5-11.4: Develop a program for monitoring noise levels and investigating complaints.
- Policy 5-11.5: Provide education to the community at large about the importance of maintaining a healthy noise environment, and identify ways residents can assist in noise abatement efforts.

The City of Rialto is largely built out and the street system is well established, creating challenges for separating noise-sensitive land uses from primary noise sources. Thus, the Safety and Noise chapter of

the RGP establishes policies guarding against new noise or land use conflicts to minimize the impact of existing noise sources on the community. **Table 12: Rialto Noise Guidelines for Land Use Planning** presents the City’s exterior noise guidelines for land use planning. It should also be noted that the Safety and Noise chapter of the RGP mentions sound levels exceeding 40 to 45 dBA are generally considered to cause sleep interference within a residence. The RGP also references Title 24 of the California Health and Safety Code stipulating a maximum of 45 dBA for interior residential noise levels.

Table 12: Rialto Noise Guidelines for Land Use Planning				
Land Use Category	Community Noise Exposure (L_{dn} or CNEL, dBA)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
R2 - Residential 2, R6 - Residential 6	50 – 60	60 – 65	65 – 70	70 – 85
R12 - Residential 12	50 – 60	60 – 65	65 – 70	70 – 85
R21 - Residential 21, R45 - Residential 45	50 – 60	60 – 70	70 – 75	75 – 85
DMU - Downtown Mixed-Use	50 – 60	60 – 75	75 – 80	80 – 85
CC - Community Commercial	50 – 65	65 – 75	75 – 80	80 – 85
GC - General Commercial	50 – 65	65 – 75	75 – 80	80 – 85
BP - Business Park, O - Office	50 – 65	65 – 75	75 – 80	80 – 85
LI - Light Industrial	50 – 70	70 – 75	75 – 80	80 – 85
GI - General Industrial	50 – 75	75 – 85	NA	NA
P - Public Facility, P - School Facility	50 – 60	60 – 65	65 – 70	70 – 85
OSRC - Open Space - Recreation	50 – 75	NA	75 – 80	80 – 85
OSRS - Open Space - Resources	50 – 75	NA	75 – 80	80 – 85
NA: Not Applicable; dBA: Decibel				
Notes:				
Normally Acceptable – Specified land use is satisfactory, assuming buildings are of conventional construction.				
Conditionally Acceptable – New development should be undertaken only after detailed analysis of noise reduction requirements are made.				
Normally Unacceptable – New development should be discouraged, or a detailed analysis of noise reduction requirements must be made.				
Clearly Unacceptable – New development should generally not be undertaken.				
Source: City of Rialto. (2010). Rialto General Plan.				

City of Rialto Code of Ordinances

A noise ordinance is intended to control unnecessary, excessive, and annoying sounds from stationary, non-transportation noise sources. Noise ordinance requirements are not applicable to mobile noise sources such as heavy trucks traveling on public roadways. Federal and State laws preempt control of mobile noise sources on public roads. Noise ordinance standards generally apply to industrial and commercial noise sources, as well as parks and schools affecting residential areas. The Rialto Municipal Code (RMC) prohibits the production of excessive noise, and is applied to future development within the City to determine potential noise impacts.

The City has also instated permitted hours for disturbances specifically from construction activity under RMC Section 9.50.070. This code states that no person shall be engaged in any type of work relating to construction, alteration, repair, addition, movement, demolition, or improvement to any building or structure except within the hours provided in **Table 13: Permitted Hours of Construction Work** below. However, Section 9.50.060 of the RMC indicates exclusions from the provisions of this specific chapter of the RMC. As described in Section 9.50.060(L) of the RMC, noise sources associated with construction,

repair, or excavation, are exempt so long as there is a valid written agreement with the City or any of its political subdivisions that provides for noise mitigation measures.

Table 13: Permitted Hours of Construction Work	
Days of Week	Time^{1,2}
October 1 st through April 30 th	
Monday – Friday	7:00 a.m. to 5:30 p.m.
Saturday	8:00 a.m. to 5:00 p.m.
Sunday	No Permissible Hours
State Holidays	No Permissible Hours
May 1 st through September 30 th	
Monday – Friday	6:00 a.m. to 7:00 p.m.
Saturday	8:00 a.m. to 5:00 p.m.
Sunday	No Permissible Hours
State Holidays	No Permissible Hours
Notes: For purposes of this section, the following exceptions shall apply: 1. Emergency repair of existing installations, equipment, or appliances; and 2. Such work that complies with the terms and conditions of a written early work permit issued by the city manager or his or her designee upon a showing of a sufficient need and justification for the permit due to hot or inclement weather, the use of an unusually long process material, or other circumstances of an unusual and compelling nature.	
Source: City of Rialto, <i>Rialto Municipal Code</i> , Section 9.50.070, codified through Ordinance No. 1665, passed February 8, 2022. (Supp. No. 32)	

The Project would be subject to the limitations imposed by the City regarding construction noise, as depicted in **Table 13: Permitted Hours of Construction Work**.

The following section of the RMC noise ordinance is relevant for operational noise.

9.50.050: Controlled hours of operation.

It is unlawful for any person to engage in the following activities other than between the hours of 7:00 a.m. and 8:00 p.m. in all zones.

- A. Operate or permit the use of powered model vehicles and planes;
- B. Load or unload any vehicle, or operate or permit the use of dollies, carts, forklifts, or other wheeled equipment that causes any impulsive sound, raucous or unnecessary noise within one thousand feet of a residence;
- C. Operate or permit the use of domestic power tools, or machinery or any other equipment or tool in any garage, workshop, house or any other structure;
- D. Operate or permit the use of gasoline or electric powered leaf blowers, such as commonly used by gardeners and other persons for cleaning lawns, yards, driveways, gutters and other property;
- E. Operate or permit the use of privately operated street/parking lot sweepers or vacuums, except that emergency work and/or work necessitated by unusual conditions may be performed with the written consent of the city manager;

- F. Operate or permit the use of pile driver, steam or gasoline shovel, pneumatic hammer, steam or electric hoist or other similar devices;
- G. Operate or permit the use of electrically operated compressor, fan, and other similar devices;
- H. Perform ground maintenance on golf course grounds and tennis courts contiguous to golf courses that creates a noise disturbance across a residential or commercial property line;
- I. Operate or permit the use of any motor vehicle with a gross vehicle weight rating in excess of ten thousand pounds, or of any auxiliary equipment attached to such a vehicle, including but not limited to refrigerated truck compressors, for a period longer than fifteen minutes in any hour while the vehicle is stationary and on a public right-of-way or public space except when movement of the vehicle is restricted by other traffic;
- J. Repair, rebuild, reconstruct or dismantle any motor vehicle or other mechanical equipment or devices in a manner so as to be plainly audible across property lines.

Additionally, Section 9.50.060(O) of the RMC states that sounds generated in commercial and industrial zones that are necessary and incidental to the uses permitted therein are exempt from the Controlled Hours of Operation.

San Bernardino County Code of Ordinances

Section 83.01.090(a) of the San Bernardino County Code of Ordinances (San Bernardino County Code) establishes a vibration standard of 0.2 in/sec PPV beyond the lot line of the vibration source. The Project-generated vibration will be assessed against this threshold pursuant to 2016 RSPA Final SEIR Mitigation Measure **NOI-3 (N-7)**.

Existing Conditions

Existing Noise Sources

Rialto is impacted by various noise sources. Mobile sources of noise, especially cars and trucks, are the most common and significant sources of noise in most communities. Other sources of noise are the various land uses (i.e., residential, commercial, institutional, and recreational and parks activities) throughout the City that generate stationary-source noise.

Noise Measurements

The project site is currently vacant and unoccupied. To quantify existing ambient noise levels in the Project area, Kimley-Horn conducted four short-term noise measurements on June 5, 2025; see **Appendix G**. The noise measurement sites were representative of typical existing noise exposure within and immediately adjacent to the project site. Short-term L_{eq} measurements are considered representative of the noise levels throughout the day. The average noise levels and sources of noise measured at each location are listed in **Table 14: Existing Noise Measurements**.

Table 14: Existing Noise Measurements

Site	Location	Duration	Date	Time	Leq (dBA)	Lmin (dBA)	Lmax (dBA)
1	Near the southwest corner of Linden Avenue and Renaissance Parkway	10 minutes	6/5/2025	1:27 p.m.	61.3	53.6	73.5
2	Northwest end of Thunderbolt Lane	10 minutes		1:55 p.m.	54.3	46.3	70.6
3	Jerry Eaves Park, by Leiske Drive and Ayala Drive	10 minutes		2:18 p.m.	62.5	47.2	74.6
4	Southeast corner of Baseline Road and Linden Avenue	10 minutes		2:42 p.m.	70.1	52.7	83.0

Source: Noise measurements taken by Kimley-Horn, June 5, 2025. See **Appendix G** for noise measurement results.

Threshold (a) 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;

Construction

The 2010 RSP Final EIR determined construction noise impacts associated with buildout of the 2010 RSP would be less than significant. The 2016 RSPA Final SEIR did not evaluate the potential construction noise impacts as implementation of the 2016 RSPA would not alter the findings of the 2010 RSP Final EIR with respect to construction noise for the project site.

Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., land clearing, grading, excavation, paving). Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels. During construction, exterior noise levels could affect the residential neighborhoods near the construction site. The nearest sensitive receptors to the project site are the single-family residences currently under construction adjacent to the east of the project site. As construction would occur up to the Project boundary line, construction activities may occur in close proximity to the nearest sensitive receptors. However, construction activities would occur throughout the project site and would not be concentrated at the point closest to the sensitive receptors.

Construction activities would include site preparation, grading, building construction, paving, architectural coating, and infrastructure improvements. Such activities could require dozers and tractors during site preparation; graders, excavators, tractors, scrapers, dozers, and crawler tractors during grading; forklifts, generator, cranes, welders, and tractors during building construction; pavers, paving equipment, and rollers during paving; air compressors during architectural coating; and trenchers and tractors during infrastructure improvements. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation followed by 3 to 4 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). Typical noise levels associated with individual construction equipment are listed in **Table 15: Typical Construction Noise Levels**

Equipment	Typical Noise Level (dBA) at 50 feet from Source
Air Compressor	80
Backhoe	80
Compactor	82
Concrete Mixer	85
Concrete Pump	82
Concrete Vibrator	76
Crane, Derrick	88
Crane, Mobile	83
Dozer	85
Generator	82
Grader	85
Impact Wrench	85
Jack Hammer	88
Loader	80
Paver	85
Pile-driver (Impact)	101
Pile-driver (Sonic)	95
Pneumatic Tool	85
Pump	77
Roller	85
Saw	76
Scraper	85
Shovel	82
Truck	84

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

While the RMC does not establish quantitative construction noise standards, this analysis conservatively uses the FTA's threshold of 80 dBA (8-hour L_{eq}) for residential to evaluate construction noise impacts. The noise levels calculated in **Table 16: Project Construction Noise Levels** show estimated exterior construction noise levels at the nearest sensitive receptor for each construction phase without accounting for attenuation from existing physical barriers. The equipment for the construction phases that are anticipated to overlap, such as paving/building construction, building construction/architectural coating, and building construction/infrastructure improvements/paving, have been combined for purposes of analysis to conservatively represent potential maximum construction noise levels.

Construction Phase	Receptor Location		Unmitigated Modeled Exterior Noise Level (dBA L_{eq}) ¹	Mitigated Modeled Exterior Noise Levels (dBA L_{eq}) ²	Noise Threshold (dBA L_{eq} (8-hour)) ³	Exceeded?
	Land Use	Direction				
Individual Phases						
Site Preparation	Residential	East	73.0	63.0	80	No
Grading	Residential	East	84.7	74.7	80	No

Table 16: Project Construction Noise Levels

Construction Phase	Receptor Location		Unmitigated Modeled Exterior Noise Level (dBA L _{eq}) ¹	Mitigated Modeled Exterior Noise Levels (dBA L _{eq}) ²	Noise Threshold (dBA L _{eq} (8-hour)) ³	Exceeded?
	Land Use	Direction				
Building Construction	Residential	East	76.6	66.6	80	No
Paving	Residential	East	85.7	75.7	80	No
Architectural Coating	Residential	East	79.7	69.7	80	No
Infrastructure Improvements	Residential	East	67.2	57.2	80	No
Overlapping Phases						
Paving/Building Construction	Residential	East	86.2	76.2	80	No
Building Construction /Architectural Coating	Residential	East	81.4	71.4	80	No
Building Construction/ Infrastructure Improvements/ Paving	Residential	East	86.3	76.3	80	No
Notes:						
1. Equipment was assumed to operate throughout the project site at staggered distances near the property line. The distances used in the RCNM model can be seen in Appendix G .						
2. Mitigated noise levels include implementation of 2010 RSPA Mitigation Measure N-02 to reduce construction levels. Mitigation Measure N-02 would require the implementation of noise-reduction features including mufflers and engine shrouds.						
3. The FTA Noise and Vibration Manual establishes construction noise standards of 80 dBA L _{eq} (8-hour) for residential uses.						
Source: Federal Highway Administration (2006). Roadway Construction Noise Model. Refer to Appendix G for noise modeling results.						

As shown in **Table 17**, unmitigated exterior construction noise levels would range from 67.2 dBA to 86.3 dBA at the nearest residential uses to the east of the project site, exceeding the 80 dBA (8-hour L_{eq}) threshold. However, with implementation of Mitigation Measure **N-02** from the 2010 RSP Final EIR and 2016 RSPA Final SEIR, construction noise levels would be reduced to a range of 57.2 dBA to 76.3 dBA. Mitigation Measure **N-02** requires the use of noise-reduction features including mufflers and engine shrouds. The FHWA states that muffler systems can reduce noise levels by 10 dBA or more.¹¹ With implementation of Mitigation Measure **N-02**, construction noise levels would not exceed the FTA's 80 dBA (8-hour L_{eq}) threshold for residential uses. Additionally, 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 some sensitive uses may be exposed to elevated noise levels during Project construction, heavy construction equipment would be in motion and construction noise would be acoustically dispersed throughout the project site (i.e., not concentrated in one area near adjacent sensitive uses). In addition, Project construction would be required to comply with the allowable construction hours as outlined in RMC Section 9.50.070.

¹¹ Federal Highway Administration, *Special Report - Measurement, Prediction, and Mitigation*, Chapter 4 Mitigation, 2007.

Therefore, impacts would be less than significant with implementation of Mitigation Measure **N-02**. Notwithstanding, the Project would be subject to additional noise mitigation measures implemented by the 2010 RSP Final EIR and the 2016 RSPA Final SEIR, which include several construction noise reduction measures to minimize potential construction-related noise impacts at the nearest residences and would further reduce Project construction noise impacts.

Operations

The 2010 RSP Final EIR determined stationary source (e.g., mechanical equipment, trucks, and parking areas) and off-site traffic noise impacts associated with buildout of the 2010 RSP would be significant and unavoidable. The 2016 RSPA Final SEIR did not evaluate the potential stationary source or off-site traffic noise impacts as implementation of the 2016 RSPA would not alter the findings of the 2010 RSP Final EIR with respect to operational noise for the project site.

As considered in the prior environmental analysis, implementation of the proposed Project would create new sources of noise in the Project vicinity in comparison to existing conditions. The major noise sources associated with the Project that would potentially impact existing nearby residences and other land uses include stationary equipment (e.g., air conditioners, etc.); parking areas (i.e., car door slamming, car radios, engine start-up, and car pass-by); landscape maintenance; and off-site traffic noise. It should be noted that the Project proposes a six-foot-high block wall pursuant to 2016 RSPA Final SEIR Mitigation Measure **NOI-4**.

On-Site Noise Sources

Mechanical Equipment

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.¹² The nearest sensitive receptor (single-family residential uses to the east) would be located as close as 30 feet from the HVAC equipment at the project site. At this distance, mechanical equipment noise would attenuate to 56.4 dBA. Operation of mechanical equipment would not increase ambient noise levels beyond the acceptable compatible land use noise levels of 60 dBA for residential uses.¹³ Therefore, the proposed Project would result in a less than significant impact related to mechanical equipment noise levels.

Parking Noise

The Project would provide 751 parking spaces. Parking spaces would be a combination of ground-floor garage spaces for each unit, and open parking spaces along Project roadways. Traffic associated with parking activities are typically not of sufficient volume to exceed community noise standards, which are based on a time-averaged scale such as the CNEL scale. The instantaneous maximum sound levels generated by a car door slamming, engine starting up, and car pass-by range from 53 to 61 dBA.¹⁴

Parking noise would primarily occur from parking activities along Project roadways, which would be as close as 30 feet from the adjacent single-family residential uses. At this distance, parking noise levels could reach 57.4 dBA at the nearest receptors, accounting for noise attenuation from the proposed six-foot-

¹² Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden. (2015). Noise Navigator Sound Level Database with Over 1700 Measurement Values.

¹³ City of Rialto (2010). Rialto General Plan.

¹⁴ Ibid.

high block wall.¹⁵ Additionally, parking noise is generated by the single-family residential uses to the east under existing conditions. Therefore, Project stationary noise levels would not result in a noticeable increase in ambient noise and would comply with the City’s noise standards. Impacts would be less than significant.

Landscape Maintenance

Development and operation of the Project include new landscaping that would require periodic maintenance. Noise generated by a gasoline-powered lawnmower is estimated to be approximately 70 dBA at 5 feet.¹⁶ Maintenance activities would operate during daytime hours for brief periods of time as allowed by the RMC and would not permanently increase ambient noise levels in the Project vicinity and would be consistent with activities that currently occur at the surrounding uses. Landscape maintenance noise would attenuate to 56.0 dBA at the single-family residential uses located approximately 10 feet to the east of proposed landscape areas within the project site, accounting for noise attenuation from the proposed six-foot-high block wall.¹⁷ Noise associated with landscape maintenance would not exceed the City’s noise standards of 60 dBA for residential uses. Further, landscape maintenance noise is generated by the single-family residential uses to the east under existing conditions. Therefore, the proposed Project would result in a less than significant impact related to landscape maintenance noise levels.

Off-Site Traffic Noise

Implementation of the Project would generate increased traffic volumes along nearby roadway segments in comparison to the existing site conditions. Based on the Project Traffic Study, the proposed Project would result in approximately 2,102 daily trips. When compared to the 2016 RSPA project-generated 3,005 daily trips, the proposed Project would result in a net decrease of 903 daily trips.

The Opening Year “2026 Without Project” and “2026 Plus Project” scenarios were compared **Table 17: Opening Year Traffic Noise Levels**. The Project would result in significant increases in traffic noise if the Project would result in an increase of 3.0 dBA CNEL, which is considered a just-perceivable difference in noise level. As shown in **Table 17: Opening Year Traffic Noise Levels**, roadway noise levels would range from 61.2 dBA to 70.2 dBA under 2026 Without Project conditions and from 61.5 dBA to 70.3 dBA under 2026 Plus Project conditions. The highest noise levels would occur along Ayala Drive between SR-210 eastbound ramps to Renaissance Parkway. As shown in **Table 18**, Project generated traffic would result in a maximum increase of 0.4 dBA. As the noise level increase is below 3.0 dBA, a less than significant impact would occur in this regard.

Table 17: Opening Year Traffic Noise Levels						
Roadway Segment	Opening Year 2026 Without Project		Opening Year 2026 With Project		Change	Significant Impacts
	ADT	dB CNEL at 100 feet from Roadway Centerline	ADT	dB CNEL at 100 feet from Roadway Centerline		
Ayala Drive						

¹⁵ An 8 dBA reduction was applied for the proposed six-foot-high block wall per RCNM Appendix A.

¹⁶ United State Environmental Protection Agency (EPA). (1971). Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances.

¹⁷ An 8 dBA reduction was applied for the proposed six-foot-high block wall per RCNM Appendix A.

Table 17: Opening Year Traffic Noise Levels

Roadway Segment	Opening Year 2026 Without Project		Opening Year 2026 With Project		Change	Significant Impacts
	ADT	dBa CNEL at 100 feet from Roadway Centerline	ADT	dBa CNEL at 100 feet from Roadway Centerline		
SR-210 WB Ramps to SR-210 EB Ramps	37,609	69.0	38,135	69.0	0.0	No
SR-210 EB Ramps to Renaissance Parkway	50,414	70.2	51,234	70.3	0.1	No
South of Renaissance Parkway	28,275	67.7	28,380	67.8	0.1	No
North of Baseline Road	24,913	67.2	25,018	67.2	0.0	No
Linden Avenue						
South of Renaissance Parkway	14,929	62.5	16,287	62.9	0.4	No
Miro Way to Baseline Road	11,010	61.2	11,756	61.5	0.3	No
Renaissance Parkway						
Linden Avenue to Ayala Drive	16,658	65.4	17,816	65.7	0.3	No

ADT = average daily trips; dBA = A-weighted decibels; CNEL = community noise equivalent level.
Source: Based on traffic data within the *Renaissance II Residential Project*, prepared by Kimley-Horn, June 2025.

On-Site Traffic Noise

The following analysis evaluates noise impacts from off-site traffic on future on-site sensitive receptors in accordance with 2016 RSPA Final SEIR Mitigation Measure **NOI-4**. Exterior noise levels associated with future traffic noise were modeled at future on-site residential units to determine if the City's exterior conditionally acceptable noise standard of 65 dBA CNEL for residential uses at the backyard areas of first row dwellings along Linden Avenue would be exceeded. The Project proposes a six-foot-high concrete wall along the western boundary, which has been accounted for in this analysis, pursuant to 2016 RSPA Final SEIR Mitigation Measure **NOI-4**.

Roadways and future dwelling units (or "receivers") were digitized in SoundPLAN based on the project site plan layout and topographical data for the Project area. The model accounted for the differences in elevation between the roadway and each receiver and noise reductions from intervening walls/structures and ground types. **Appendix G** includes the location of the modeled noise receivers at the project site and the modeling results; refer to *Table H-1: Modeled Traffic Noise Levels at On-site Receptors* within **Appendix G**. Accounting for the proposed six-foot-high concrete wall along the western boundary of the project site, exterior noise levels would range from 35.1 dBA CNEL to a maximum of 60.6 dBA CNEL at first floor receivers, and from 39.2 dBA CNEL to a maximum of 64.5 dBA CNEL at second receivers at the project site; refer to refer to *Table H-1* within **Appendix G**.

Based on modeled exterior noise levels modeled in SoundPLAN, interior noise levels were calculated using an exterior-to-interior reduction of 25 dBA for standard construction practices.¹⁸ Interior noise levels would not exceed the City and California Building Code (CBC) interior noise standard of 45 dBA CNEL for residential uses along Linden Drive; refer to *Table H-1* within **Appendix G**. Based on standard construction practices and the Project's heating, ventilation, and air conditioning (HVAC) system(s), interior noise levels at all other receivers would be 45 dBA CNEL or lower in compliance with the CBC and City noise standards and would not require additional noise insulation features. As the exterior and interior noise are below

¹⁸United States Department of Housing and Urban Development. (2009). Noise Guidebook. <https://www.huduser.gov/portal/portal/sites/default/files/pdf/The-Noise-Guidebook.pdf>.

the City's 65 dBA CNEL and 45 dBA CNEL for exterior and interior noise, less than significant impact would occur.

Mitigation Program

Mitigation Measures from the 2016 RSPA Final SEIR

The 2016 RSPA Final SEIR includes measures to reduce potential impacts associated the implementation of the 2016 RSPA. The following measures from the 2016 RSPA Final SEIR are applicable to the proposed Project.

Mitigation Measure NOI-1: Prior to the issuance of any grading plan, the applicant shall demonstrate to the satisfaction of the Public Works Director that the following notes are shown on the grading plans:

- During all Project area excavation and grading on site, the Project contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers consistent with manufacturers' standards.
- The Project contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors.
- During all Project area construction, the construction contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receptors. During all Project area construction, the construction contractor shall limit all construction-related activities that would result in high noise levels to the hours shown in Section 9.50.070(b) of the City of Rialto Municipal Code.

Mitigation Measure NOI-3: Prior to the issuance of any grading, the applicant shall demonstrate that the following mitigation measures have been incorporated into the project design or that the mitigation does not apply to the current development:

Mitigation Measure N-1: Construction activities shall be limited to the City's allowable hours of construction activities in accordance with the City's Noise Ordinance.

Mitigation Measure N-2: All construction equipment shall use noise-reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer.

Mitigation Measure N-3: Construction staging and heavy equipment maintenance activities shall be performed a minimum distance of 300 feet from any nearby noise sensitive uses, unless safety or technical factors take precedence, subject to City approval.

Mitigation Measure N-4: Stationary combustion equipment such as pumps or generators operating within 300 feet of any nearby noise sensitive uses shall be shielded with a noise protection barrier.

Mitigation Measure N-5: The City shall require that a noise impact analysis be prepared for all proposed residential subdivisions within the Specific Plan and for any commercial or business developments located adjacent to existing or proposed noise sensitive land uses. Each noise impact analysis shall identify potential construction noise impacts and provide

mitigation, if necessary to reduce the construction noise impacts to within the City noise level standards of the Noise Element of the Rialto General Plan.

Mitigation Measure N-6: The City shall require that a noise impact analysis be prepared for all proposed residential subdivisions within the Specific Plan, and any proposed commercial retail or business uses located adjacent to Alder Avenue, Baseline Road, SR-210, or adjacent to other sensitive on-site or off-site uses. Each noise impact analysis shall identify potential direct, project related, transportation noise impacts and provide mitigation, if necessary, to reduce the traffic noise impacts as well as other onsite stationary noise impacts to within the City noise level standards of the Land Use Element of the Rialto General Plan.

Mitigation Measure N-7: The City shall require that a vibration impact analysis be prepared for all proposed residential subdivisions within the Specific Plan and for any commercial or business developments located adjacent to existing or proposed vibration sensitive land uses. Each vibration impact analysis shall identify potential construction-related vibration impacts and provide mitigation, if necessary, to reduce the construction to within the County vibration level standards.

Mitigation Measure NOI-4: Prior to Certificate of Occupancy or City acceptance of the Public Parks (as applicable), the applicant shall demonstrate that required sound barriers have been constructed for the following Planning Areas:

2. For residential uses proposed in Sub-Areas 110, 116, and 113 with outdoor living areas (e.g., backyards/patios and balconies/decks) or recreational areas (e.g., barbecue area or children's playground) within 95 feet of the Linden Avenue centerline, prior to the occupancy of the residential units, outdoor living/recreational areas should be protected with a sound wall with a minimum height of 6 feet. The Development Services Director/Planning Division may also allow the applicant to prepare a site-specific noise study that demonstrates noise walls are not needed.

Mitigation Measures from the 2010 RSP Final EIR

The 2010 RSP Final EIR includes measures to reduce potential impacts associated with the implementation of the RSP project. The following measures from the 2010 RSP Final EIR are applicable to the proposed Project.

N-01: Construction activities shall be limited to the City's allowable hours of construction activities shown in Table 4.11-2 in accordance with the City's Noise Ordinance.

N-02: All construction equipment shall use noise-reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer.

N-03: Construction staging and heavy equipment maintenance activities shall be performed a minimum distance of 300 feet from any nearby noise sensitive uses, unless safety or technical factors take precedence.

N-04: Stationary combustion equipment such as pumps or generators operating within 300 feet of any nearby noise sensitive uses shall be shielded with a noise protection barrier.

N-05: The City shall require that a noise impact analysis be prepared for all proposed residential subdivisions within the Specific Plan and for any commercial or business developments located adjacent to existing or proposed noise sensitive land uses. Each noise impact analysis shall identify

potential construction noise impacts and provide mitigation, if necessary to reduce construction noise impacts to within the City noise level standards.

N-06: The City shall require that a noise impact analysis be prepared for all proposed residential subdivisions within the Specific Plan and any proposed commercial retail uses located adjacent to Alder Avenue, Baseline Road, or SR-210. Each noise impact analysis shall identify potential transportation noise impacts and provide mitigation, if necessary, to reduce the traffic noise impacts to within the City noise level standards.

Conclusion

With regard to CEQA Section 21166 and CEQA Guidelines Section 15162(a), the changes proposed by the Project would not result in any new impacts, or increase the severity of the previously identified impacts, with respect to noise. Therefore, preparation of a subsequent environmental analysis is not warranted.

Threshold (b) Exposure of persons to or generation of, excessive groundborne vibration or groundborne noise levels.

The 2010 RSP Final EIR determined construction and operational vibration impacts associated with buildout of the 2010 RSP would be less than significant. The 2016 RSPA Final SEIR did not evaluate the potential construction and operational vibration impacts as implementation of the 2016 RSPA would not alter the findings of the 2010 RSP Final EIR with respect to vibration for the project site.

Once operational, the Project would not be a source of groundborne vibration. Increases in groundborne 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 groundborne vibration, depending on the specific construction equipment used and the operations involved.

The Federal Transit Administration (FTA) has published standard vibration velocities for construction equipment operations. 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. Further, Caltrans has identified 0.4 in/sec PPV as the human annoyance threshold. Additionally, the San Bernardino County Code identifies 0.20 in/sec PPV as the vibration threshold.

Table 18: Typical Construction Equipment Vibration Levels, lists reference vibration levels at 25 feet for typical construction equipment. Groundborne vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. Based on FTA data, vibration velocities from typical heavy construction equipment operations that would be used during Project construction range from 0.003 to 0.210 in/sec PPV at 25 feet from the source of activity.

The nearest off-site use that could be exposed to construction vibration levels are the single-family residential uses located to the east of the project site, approximately 35 feet from proposed vibration-generating construction activities. Using the calculation shown in **Table 19**, at 35 feet the vibration velocities from construction equipment would not exceed 0.127 in/sec PPV, which is below San Bernardino County Code’s 0.20 in/sec PPV threshold, FTA’s 0.20 in/sec PPV structural damage threshold, and Caltrans’ 0.4 in/sec PPV human annoyance threshold. It can be reasonably assumed that at any further distance, the vibration levels would attenuate further. Therefore, 2016 RSPA Final SEIR Mitigation Measure **NOI-3 (N-7)** is satisfied and vibration impacts associated with the proposed Project would be less than significant.

Equipment	Peak Particle Velocity at 25 Feet (in/sec)	Peak Particle Velocity at 35 Feet (in/sec)¹
Vibratory Roller	0.210	0.127
Large Bulldozer	0.089	0.054
Loaded Trucks	0.076	0.046
Jackhammer	0.035	0.021
Small Bulldozer/Tractors	0.003	0.002

Notes:
 1. Calculated using the following formula: $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$, where: PPV_{equip} = the peak particle velocity in in/sec of the equipment adjusted for the distance; PPV_{ref} = the reference vibration level in in/sec from Table 7-4 of the Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, 2018; and D = the distance from the equipment to the receiver.

Source: Federal Transit Administration. (2018). *Transit Noise and Vibration Impact Assessment Manual*.

Mitigation Program

Mitigation Measures from the 2016 RSPA Final SEIR

Mitigation Measure **NOI-3 (N-7)** requires the preparation of a vibration impact analysis. This requirement has been satisfied in the analysis above.

Conclusion

The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. With regard to CEQA Section 21166 and CEQA Guidelines Section 15162(a), the changes proposed by the Project would not result in any new impacts, or increase the severity of the previously identified impacts, with respect to noise and vibration. Therefore, preparation of a subsequent environmental analysis is not warranted.

Threshold (c) 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.

The nearest airport is the San Bernardino International Airport located approximately 8.91 miles east of the project site. There are no airports within two miles of the project site. Therefore, there is no impact surrounding the proposed Project concerning airport noise, including from a private airstrip.

Mitigation Program

Mitigation Measures from the 2016 RSPA Final SEIR

None identified in the 2016 RSPA Final SEIR.

Conclusion

The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. Allowable development of the site under the 2016 RSPA could include up to 398 units. As such, the proposed development (292 units) would generate fewer trips and generate less on-site noise than assumed for the project site in the 2016 RSPA Final SEIR. With regard to CEQA Section 21166 and CEQA Guidelines Section 15162(a), the changes proposed by the Project would not result in any new impacts, or increase the severity of the previously identified impacts, with respect to noise in the vicinity of a public or private airstrip. Therefore, preparation of a subsequent environmental analysis is not warranted.

Overall Noise Impact Conclusion

With regard to CEQA Section 21166 and CEQA Guidelines Section 15162(a), the changes proposed by the Project would not result in any new impacts, or increase the severity of the previously identified impacts, with respect to noise. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.14 Population and Housing

Threshold a) Induce substantial population growth in an area, either directly or indirectly; and

Threshold b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; and

Threshold c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

The 2010 RSP Final EIR determined impacts to population and housing to be less than significant. The 2016 RSPA Final SEIR did not evaluate the potential impacts to population and housing, as the findings of the 2010 RSP Final EIR were determined to be applicable to the 2016 RSPA. No potentially significant impacts to population and housing are identified in the 2010 RSP Final EIR. The 2016 RSPA Final SEIR found that the residential land uses proposed by the 2016 RSPA would not exceed residential land uses as planned by the 2010 RSP and evaluated in the 2010 RSP Final EIR.

The Applicant is proposing the development of up to 292 residential dwelling units and an approximately 2.2-acre private recreation area, within the boundaries of the 2016 RSPA area. The project site is located south of SR-210 and east of Linden Avenue. The project site is comprised of Planning Areas 113, 117, and portions of 110, 111, and 129 within the 2016 RSPA area. The 2016 RSPA Final SEIR analysis assumed a total of 398 dwelling units for the project site, which is more than the proposed 292 dwelling units. The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. Therefore, no growth or development beyond what was addressed in the 2010 RSP Final EIR would occur. In accordance with the conceptual nature of the 2016 RSPA residential planning areas, the proposed Project includes modifications to previously conceptualized roadway alignments and housing types with varied densities that overlap the 2016 RSPA planning area boundaries. However, the project site is comprised of planning areas designated for residential uses. Further, the proposed Project would have a net density of 11.9 dwelling units per acre (du/ac) and 292 dwelling units, which is consistent with the ranges of density and dwelling units assumed in the 2016 RSPA for the planning areas included in the proposed Project. The private recreation area would include gated entry to provide private access to future residents and would not be open to the public. As such, implementation of the private recreation area would not result in an increase in population within the City. The proposed Project would not induce substantial population growth that was not previously analyzed. Accordingly, no new impact relative to population and housing or a substantial increase in the severity of a previously identified significant impact evaluated in the 2010 RSP Final EIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2010 RSP Final EIR or 2016 RSPA Final SEIR was certified is available that would impact the prior finding of no significant impact to population and housing.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures were identified.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures were identified.

Project Mitigation Measures

No mitigation is required.

Overall Population and Housing Conclusion

With regard to CEQA Section 21166 and CEQA Guidelines Section 15162(a), the changes proposed by the Project would not result in any new impacts, or increase the severity of the previously identified impacts, with respect to population and housing. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.15 Public Services

Threshold a) 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: fire protection, police protection, schools, parks, and other public facilities.

The 2010 RSP Final EIR determined impacts to public services to be less than significant. The 2016 RSPA Final SEIR did not evaluate the potential impacts to public services, as the findings of the 2010 RSP Final EIR were determined to be applicable to the 2016 RSPA. No potentially significant impacts to public services are identified in the 2010 RSP Final EIR. The Applicant is currently proposing the development of up to 292 residential dwelling units and an approximately 2.2-acre private recreation area on an approximately 25.37-acre project site, within the boundaries of the 2016 RSPA area. The project site is comprised of Planning Areas 113, 117, and portions of 110, 111, and 129, within the 2016 RSPA area. The 2016 RSPA Final SEIR analysis assumed a total of 398 dwelling units for the project site, which is more than the proposed 292 dwelling units. The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. Thus implementation of the Project would be consistent with the allowable uses. In accordance with the conceptual nature of the 2016 RSPA residential planning areas, the proposed Project includes modifications to previously conceptualized roadway alignments and housing types with varied densities that overlap the 2016 RSPA planning area boundaries. The Project would be implemented consistent with the 2016 RSPA Residential Development Standards. Accordingly, no new impact relative to public services or a substantial increase in the severity of a previously identified significant impact evaluated in the 2010 RSP Final EIR would occur.

Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2010 RSP Final EIR was certified is available that would impact the prior finding of no significant impact to public services.

To provide adequate funding for fire protection facilities, the City requires the payment of development impact fees (DIFs) to be paid by the Project applicant. The DIF varies depending on development type and size. Individual developers within the 2016 RSPA area would be required to pay DIFs according to the City's fee schedule at the time of development. The Project applicant would pay its fair share of annual recurring costs to the City via various existing tax and revenue mechanisms. Payment of DIFs as the Project is developed would result in a less than significant impact in regards to fire services. Therefore, with payment of the required DIFs, implementation of the proposed Project would result in a less than significant impact to fire services.

Similar to fire protection facilities, the City requires the payment of DIFs to ensure adequate funding for police protection facilities, which are based on development type and size. The fee is designed to cover the added expense to public services as a result of new development. The fees associated with the proposed Project would help the City provide police services at the project site. Therefore, with payment of the required DIFs, implementation of the proposed Project would result in a less than significant impact on police protection services.

Although residential developments typically result in an increased demand for public school or public park facilities, the proposed Project is consistent with the residential development analyzed for the

project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR, which was found to have a less than significant impact. Therefore, the impact from the Project on public services would be less than significant.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures were identified.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures were identified.

Project Mitigation Measures

No mitigation is required.

Overall Public Services Impact Conclusion

With regard to CEQA Section 21166 and CEQA Guidelines Section 15162(a), the changes proposed by the Project would not result in any new impacts, or increase the severity of the previously identified impacts, with respect to public services. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.16 Recreation

Threshold a) 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; and

Threshold b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

The 2010 RSP Final EIR determined impacts to recreation to be less than significant. The 2016 RSPA Final SEIR did not evaluate the potential impacts to recreation, as the findings of the 2010 RSP Final EIR were determined to be applicable to the 2016 RSPA. No potentially significant impacts to recreation are identified in the 2010 RSP Final EIR. The Project is proposing the development of 292 residential dwelling units and an approximately 2.2-acre private recreation area on an approximately 25.37-acre project site within the boundaries of the 2016 RSPA area. The project site is comprised of Planning Areas 113, 117, and portions of 110, 111, and 129. The proposed private recreation area is consistent with the existing Private Recreation Center zoning designation of Planning Area 117. The proposed private recreation area would provide recreational uses limited to future residents. The proposed private recreation area would include a community pool, spa, picnic and barbeque areas, grass lawns, dog park, a playground, a basketball half court, two pickleball courts, and restrooms. Additionally, the private recreation area would include fencing and gated entry to provide private access to future residents. The 2016 RSPA Final SEIR analysis assumed a total of 398 dwelling units for the project site, which is more than the proposed 292 dwelling units, accordingly the demand for associated recreation facilities would also be less than what was previously analyzed. The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. Further, the recreational and park usage is consistent with the surrounding area.

Accordingly, no new impact relative to recreation or a substantial increase in the severity of a previously identified significant impact evaluated in the 2010 RSP Final EIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2010 RSP Final EIR was certified is available that would impact the prior finding of no significant impact to recreation.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures were identified.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures were identified.

Project Mitigation Measures

No mitigation is required.

Overall Recreation Impact Conclusion

With regard to CEQA Section 21166 and CEQA Guidelines Section 15162(a), the changes proposed by the Project would not result in any new impacts, or increase the severity of the previously identified impacts, with respect to recreation. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.17 Transportation/Traffic

The 2016 RSPA Final SEIR identifies the potential for traffic and circulation impacts as a result of 2016 RSPA implementation. In summary, traffic generated from implementation of the 2016 RSPA project would exceed the City of Rialto's TIA guidelines for 26 intersections. Furthermore, 22 study area roadway segments were also found to operate at unsatisfactory levels of service. Implementation of Mitigation Measure **TRANS-1**, which includes either the construction of and/or monetary contribution in proportion to an individual's project's impacts to traffic improvements when individual project impacts are identified, would reduce traffic impacts at impacted roadway segments and intersections to less than significant. The 2016 RSPA Final SEIR included a list of the improvements required to meet the City's level of service standard and offset project impacts.

The Traffic Study for the proposed Project was prepared by Kimley-Horn and Associates (June 2025) to address the traffic-related impacts. The Traffic Study is summarized in this Addendum and included as **Appendix H**. Following the passage of Senate Bill 743, Vehicle Miles Traveled (VMT) was designated as the metric for evaluating transportation projects under the State CEQA Guidelines. However, CEQA Section 15164 allows the use of prior analysis, including established thresholds like Level of Service (LOS) in an effort to confirm that the Project is consistent with previously analyzed impacts.

The 2016 RSPA Final SEIR identified that individual projects constructed within the 2016 RSPA area could result in significant traffic impacts. Therefore, this Traffic Impact Analysis has been prepared in compliance with Mitigation Measure **TRANS-1** of the 2016 RSPA Final SEIR which states:

Mitigation Measure TRANS-1: Prior to the issuance of building permits, the City Traffic Engineer shall review individual site-specific development proposals to evaluate whether such proposals would cause LOS failure at project intersections. If it is determined that traffic generated from such proposal would cause LOS failure, the applicant shall provide, either through construction of and/or monetary contribution for, improvements listed in Table 4.7-20, Table 4.7-21, and Table 4-7-22 of the 2016 Recirculated Draft SEIR. Such improvements and/or monetary contribution shall be provided in proportion to an individual project's impacts on traffic and to the satisfaction of the City Traffic Engineer.

Methodology

The Traffic Study was conducted in accordance with the traffic study requirements of the City of Rialto, based on the City's *Traffic Impact Analysis Report Guidelines and Requirements* and in accordance with the San Bernardino Association of Governments (SANBAG) Congestion Management Program (CMP) requirements. The Traffic Study addresses existing and short-term future traffic conditions, taking into account the Project trips to be generated by the Project and potential Project-related effects on the surrounding circulation system. The Traffic Study includes a description of existing conditions in the surrounding area, estimated Project trip generation and distribution, future traffic growth, and an assessment of Project-related effects on the roadway system. Where necessary, circulation system improvements have been identified to achieve acceptable intersection operation in the vicinity of the Project.

The analysis evaluated traffic conditions for the following scenarios:

1. Existing Conditions
2. Opening Year 2026 – Existing Plus Growth

3. Opening Year 2026 – Existing Plus Growth Plus Project
4. Opening Year 2026 Cumulative
5. Opening Year 2026 Cumulative –With Project

The Traffic Study analyzes morning and evening peak hour conditions at seven existing intersections and four future driveways. In addition, seven roadway segments were analyzed.

Intersections

1. Ayala Drive at SR-210 Westbound Ramps
2. Ayala Drive at SR-210 Eastbound Ramps
3. Ayala Drive at Renaissance Parkway
4. Linden Avenue at Renaissance Parkway
5. Linden Avenue at Miro Way
6. Linden Avenue at Baseline Road
7. Ayla Drive at Baseline Road

Future Driveway Intersections

- D1. Linden Avenue at North Project Driveway
- D2. Linden Avenue at South Project Driveway
- D3. Ayala Drive at Scholl Way
- D4. Ayala Drive at Project Driveway

Roadway Segments

1. Ayala Drive: SR-219 WB Ramps to SR-210 EB Ramps
2. Ayala Drive: SR-210 EB Ramps to Renaissance Parkway
3. Linden Avenue: Renaissance Parkway to Project Access
4. Linden Avenue: Miro Way to Baseline Road
5. Renaissance Parkway: Linden Avenue to Ayla Drive
6. Ayala Drive: Renaissance Parkway to Project Access
7. Ayala Drive: Project Access to Baseline Road

Peak hour intersection operations at the study intersections were evaluated using the methods prescribed in the Highway Capacity Manual (HCM) 7th Edition, consistent with the requirements of the City and the San Bernardino County CMP. City guidelines require analysis of traffic operations to be based on the vehicular delay methodologies of the HCM. Intersection level of service (LOS) for signalized intersections is defined in terms of average vehicle delay. The City, per the City of Rialto 2010 General Plan Update, establishes minimum Level of Service standards. According to Policy 4-1.20 of the General Plan, the City requires that signalized intersections operate at LOS D or better during the morning and evening peak hours. The City's Traffic Study Guidelines requires new development to mitigate impacts that cause the level of service to fall below LOS D, or cause the peak hour delay to increase as follows:

- | | |
|---------|-----------------|
| LOS A/B | by 10.0 seconds |
| LOS C | by 8.0 seconds |

LOS D	by 5.0 seconds
LOS E	by 2.0 seconds
LOS F	by 1.0 second

Unsignalized intersections are required to operate with no vehicular movement having an average delay exceeding 120 seconds during the morning and evening peak hours.

The roadway segment analysis addresses the proposed Project's impact on daily operating conditions on roadway segments in the traffic study area. Roadway segments are evaluated by comparing the traffic volume on a roadway segment to the daily capacity of that segment, to determine the volume-to-capacity (v/c) ratio. As noted, the City's LOS standard for daily roadway operation is LOS D. The following describes the roadways within the traffic study area for the proposed Project.

Ayala Drive: Ayala Drive is designated as a Secondary Arterial and would provide four travel lanes and a bike lane in each direction. Ayala Drive is designated as a truck route throughout the 2010 RSP area with truck access restricted from Baseline Road to Renaissance Parkway. The posted speed limit along Ayala Drive is 45 miles per hour (mph).

Linden Avenue: Linden Avenue is designated as a Secondary Arterial and would provide four travel lanes within 80 feet of right-of-way. Linden Avenue is a designated truck route from Baseline Road to Miro Way and north of Casmalia Street, with truck access restricted to local deliveries between Casmalia Street and Miro Way. The posted speed limit along Linden Avenue is 35 mph. Linden Avenue would provide access to the project site via one full-movement driveway and one exit-only driveway.

Renaissance Parkway: Renaissance Parkway is designated as a Major Arterial, which would provide four travel lanes with bike lanes and a raised median within 108 feet of right-of-way. Renaissance Parkway extends in an east-west orientation through and beyond the boundaries of the City of Rialto, changing to Highland Avenue to the west and Easton Street to the east. Renaissance Parkway connects with north-south streets that have interchanges with the SR-210 Freeway to the north, and the I-10 Freeway to the south. Renaissance Parkway is a truck route between Alder Avenue and Locust Avenue, and east of Ayala Drive; with truck access restricted to local deliveries between Locust Avenue and Ayala Drive, and west of Alder Avenue. The posted speed limit along Renaissance Parkway is 45 mph.

Baseline Road: Baseline Road is designated as a Major Arterial. Baseline Road would provide four travel lanes and a bike lane in each direction within 80 feet of right-of-way. Baseline Road is a designated truck route from Ayala Drive to Linden Avenue. The posted speed limit along Baseline Road is 50 mph.

Threshold (a) Cause an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections).

The following summarizes the findings of the Traffic Impact Analysis for the four traffic scenarios.

Existing Conditions

Intersection Levels of Service: As identified in **Table 19: Summary of Intersection Operation Existing Conditions**, all of the study intersection operate at an acceptable Level of Service.

Table 19: Summary of Intersection Operation Existing Conditions

Int. #	Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS
1	Ayala Drive at SR-210 WB Ramps	S	26.8	C	26.4	C
2	Ayala Drive at SR-210 EB Ramps	S	16.6	B	19.6	B
3	Ayala Drive at Renaissance Parkway	S	20.5	C	24.5	C
4	Linden Avenue at Renaissance Parkway	S	27.1	C	34.1	C
5	Linden Avenue at Miro Way	S	7.9	A	10.5	B
6	Linden Avenue at Baseline Road	S	25.0	C	32.9	C
7	Ayala Drive at Baseline Road	S	27.7	C	29.1	C
D1	Linden Avenue at North Project Driveway	FUTURE INTERSECTION				
D2	Linden Avenue at South Project Driveway	FUTURE INTERSECTION				
D3	Ayala Drive at Scholl Way	FUTURE INTERSECTION				
D4	Ayala Drive at Project Driveway	FUTURE INTERSECTION				

Notes:

- **Bold** and shaded values indicate intersections operating at LOS E or F or significant impact to intersection per City standards.
- At a signalized intersection, delay refers to the average control delay for the entire intersection, measured in seconds per vehicle.
- At a two-way stop-controlled intersection, delay refers to the average vehicle delay on the worst (highest delay) movement.
- Delay values are based on the methodology outlined in the Highway Capacity Manual, (7th Edition).

S = Signalized
U = Unsignalized

Source: **Appendix H**

Roadway Levels of Service: As identified in **Table 20: Summary of Roadway Analysis Existing Conditions**, with the addition of ambient growth, all study area roadway segments would continue to operate at acceptable levels of service (LOS D or better) except for the following:

- Ayala Drive: SR-210 EB Ramps to Renaissance Parkway

Table 20: Summary of Roadway Analysis Existing Conditions

Roadway	Segment	Current Configuration	LOS D Capacity	Existing ADT ¹	Existing ADT w/ PCE	LOS D or Better?
Ayala Drive	SR-210 WB Ramps to SR-210 EB Ramps	4 Lanes Divided	32,999	28,526	29,790	Yes
	SR-210 EB Ramps to Renaissance Parkway	4 Lanes Divided	32,999	41,020	42,295	No
	South of Renaissance Parkway	4 Lanes Divided	32,999	23,769	24,574	Yes
	North of Baseline Road	4 Lanes Divided	32,999	20,617	21,277	Yes
Linden Avenue	South of Renaissance Parkway	4 Lanes Divided	32,999	13,760	14,316	Yes
	Miro Way to Baseline Road	4 Lanes Divided	32,999	10,135	10,549	Yes
Renaissance Parkway	Linden Avenue to Ayala Drive	4 Lanes	32,999	12,599	12,935	Yes

Table 20: Summary of Roadway Analysis Existing Conditions

Roadway	Segment	Current Configuration	LOS D Capacity	Existing ADT ¹	Existing ADT w/ PCE	LOS D or Better?
		Divided				
Notes: LOS = Level of Service; ADT = Average Daily Traffic; PCE = Passenger Car Equivalent						
Source: Appendix H						

Project Trip Generation

The proposed Project is located within Planning Areas 113 and 117, and portions of Planning Areas 110, 111, and 129. The 2016 RSPA EIR analyzed the aforementioned planning areas using the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition) for the following land uses and quantities:

- PA 110: Medium High Density Residential (MHDR)
 - ~67% of PA – 212 Dwelling Units (DU)
- PA 113: Low Density Residential (LDR)
 - 186 DU

Trip generation estimates for the Renaissance Place Residential project are based on daily and peak hourly trip generation rates obtained from the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition). ITE trip generation estimates for the Project are based on the trip generation rates for ITE Land Use 215: Single-Family Attached Housing.

Trip generation rates and resulting trip generation estimates for the Project are summarized in **Table 21: Summary of Project Trip Generation**. The Project is estimated to generate 2,102 vehicle trips on a daily basis, with 141 trips in the morning peak hour, and 167 trips in the evening peak hour.

Table 21: Summary of Project Trip Generation

Trip Generation Rates									
ITE Land Use	ITE Code	Unit	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Single-Family Attached Housing	215	DU	7.200	0.149	0.331	0.480	0.325	0.245	0.570
Project Trip Generation									
Project Land Use	Quantity	Unit	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Renaissance Specific Plan Amendment (RSPA) Trips - Project Site									
PA 110 (MHDR; 67% of PA)	212	DU	1,234	15	78	93	74	36	110
PA 113 (LDR)	186	DU	1,771	35	105	140	117	69	186
Total Approved Trips			3,005	50	183	233	191	105	296
Proposed Project									
Single-Family Attached Housing	292	DU	2,102	44	97	141	95	72	167
Total Proposed Project Trips			2,102	44	97	141	95	72	167
Net Difference (Proposed Minus Existing)			-903	-6	-86	-92	-96	-33	-129
Source: Appendix H									

Trip Distribution and Assignment

Trip distribution assumptions for the Project were developed by considering the proposed site uses, the location of the site access points and assumed percentages in and out of each access point and the routes to and from nearby roadway gates and the freeway system. Trip distribution patterns for passenger vehicles are shown in **Appendix H**.

Opening Year 2026: Existing Plus Growth

The Opening Year 2026: Existing Plus Growth scenario assumes a two percent ambient growth rate.

Intersection Levels of Service: As indicated in **Table 22: Intersection Operation - Opening Year 2026 Existing Plus Growth**, with the addition of ambient growth, all of the study intersections would operate at an acceptable Level of Service.

Table 22: Intersection Operation - Opening Year 2026 Existing Plus Growth						
Int. #	Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS
1	Ayala Drive at SR-210 WB Ramps	S	27.2	C	26.8	C
2	Ayala Drive at SR-210 EB Ramps	S	16.8	B	20.3	C
3	Ayala Drive at Renaissance Parkway	S	20.8	C	24.9	C
4	Linden Avenue at Renaissance Parkway	S	27.7	C	34.5	C
5	Linden Avenue at Miro Way	S	8.1	A	10.6	B
6	Linden Avenue at Baseline Road	S	26.0	C	34.2	C
7	Ayala Drive at Baseline Road	S	26.0	C	29.2	C
D1	Linden Avenue at North Project Driveway	FUTURE INTERSECTION				
D2	Linden Avenue at South Project Driveway	FUTURE INTERSECTION				
D3	Ayla Drive at Scholl Way	FUTURE INTERSECTION				
D4	Ayala Drive at Project Driveway	FUTURE INTERSECTION				
Notes: <ul style="list-style-type: none"> ▪ Bold and shaded values indicate intersections operating at LOS E or F or significant impact to intersection per City standards. ▪ At a signalized intersection, delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. ▪ At a two-way stop-controlled intersection, delay refers to the average vehicle delay on the worst (highest delay) movement. ▪ Delay values are based on the methodology outlined in the Highway Capacity Manual, (7th Edition). S = Signalized U = Unsignalized						
Source: Appendix H						

Roadway Levels of Service: As indicated in **Table 23: Summary of Roadway Analysis – Opening Year 2026 Existing Plus Growth** the study area roadway segments would continue to operate at acceptable levels of service (LOS D or better) with the addition of the Project and ambient growth, except for the following:

- Ayala Drive: SR-210 EB Ramps to Renaissance Parkway

Roadway	Segment	LOS D Capacity	Existing ADT	Existing ADT w/ PCE	Existing Plus Growth ADT	LOS D or Better?
Ayala Drive	SR-210 WB Ramps to SR-210 EB Ramps	32,999	28,584	29,790	30,994	Yes
	SR-210 EB Ramps to Renaissance Parkway	32,999	41,020	42,295	44,004	No
	South of Renaissance Parkway	32,999	23,769	24,574	25,065	Yes
	North of Baseline Road	32,999	20,617	21,277	21,703	Yes
Linden Avenue	South of Renaissance Parkway	32,999	13,760	14,316	14,894	Yes
	Miro Way to Baseline Road	32,999	10,135	10,549	10,975	Yes
Renaissance Parkway	Linden Avenue to Ayala Drive	32,999	12,599	12,935	13,458	Yes
Notes: LOS = Level of Service; ADT = Average Daily Traffic; PCE = Passenger Car Equivalent						
Source: Appendix H						

Opening Year 2026: Existing Plus Growth Plus Project

Intersection Levels of Service: As identified on **Table 24: Intersection Operation – Opening Year 2026 Existing Plus Growth Plus Project**, with the addition of ambient growth and project traffic, the intersections none of the intersections would have a project-related effect attributable to an increase in peak hour delay beyond the measure of significance or a change in the Level of Service to fall below LOS D.

In this Plus Project analysis, each of the project site driveways were also analyzed. The results indicate that each driveway would operate at an acceptable LOS during both peak hours.

Int. #	Intersection	Traffic Control	AM Peak Hour						PM Peak Hour					
			Without Project		With Project		Project Effect	Sig Effect?	Without Project		With Project		Project Effect	Sig Effect?
			Delay	LOS	Delay	LOS			Delay	LOS	Delay	LOS		
1	Ayala Drive at SR-210 WB Ramps	S	27.2	C	27.2	C	0.0	No	26.8	C	27.1	C	0.3	No
2	Ayala Drive at SR-210 EB Ramps	S	16.8	B	16.8	B	0.0	No	20.3	C	20.4	C	0.1	No
3	Ayala Drive at Renaissance Parkway	S	20.8	C	21.4	C	0.6	No	24.9	C	25.5	C	0.6	No
4	Linden Avenue at Renaissance Parkway	S	27.7	C	27.9	C	0.2	No	35.6	D	35.6	D	0.0	No
5	Linden Avenue at Miro Way	S	8.1	A	7.8	A	-0.3	No	10.6	B	10.3	B	-0.3	No
6	Linden Avenue at Baseline Road	S	26.0	C	26.7	C	0.7	No	34.2	C	36.5	D	2.3	No
7	Ayala Drive at Baseline Road	S	28.0	C	28.4	C	0.4	No	29.2	C	29.6	C	0.4	No
D1	Linden Avenue at North Project Driveway	U	N/A		8.5	A	N/A		N/A		10.7	B	N/A	
D2	Linden Avenue at South Project Driveway	U	N/A		16.2	C	N/A		N/A		18.0	C	N/A	
D3	Ayala Drive at Scholl Way	U	N/A		3.6	A	N/A		N/A		3.6	A	N/A	
D4	Ayala Drive at Project Driveway	U	N/A		11.8	B	N/A		N/A		11.7	B	N/A	

Notes:

- **Bold** and shaded values indicate intersections operating at LOS E or F or significant impact to intersection per City standards.
- At a signalized intersection, delay refers to the average control delay for the entire intersection, measured in seconds per vehicle.
- At a two-way stop-controlled intersection, delay refers to the average vehicle delay on the worst (highest delay) movement.
- Delay values are based on the methodology outlined in the Highway Capacity Manual, (7th Edition).

S = Signalized
 U = Unsignalized

Source: **Appendix H**

Roadway Levels of Service: As identified in **Table 25: Roadway Analysis – Opening Year Plus Growth Plus Project**, the following study roadway segment will operate at an unacceptable LOS:

- Ayala Drive: SR-210 EB Ramps to Renaissance Parkway

Table 25: Roadway Analysis – Opening Year Plus Growth Plus Project								
Roadway	Segment	LOS D Capacity	Existing ADT	Existing ADT w/ PCE	Existing Plus Growth ADT	Daily Project Traffic	Existing + Growth + Project ADT	LOS D or Better?
Ayala Drive	SR-210 WB Ramps to SR-210 EB Ramps	32,999	28,584	29,790	30,994	526	31,520	Yes
	SR-210 EB Ramps to Renaissance Parkway	32,999	41,020	42,295	44,004	820	44,824	No
	South of Renaissance Parkway	32,999	23,769	24,574	25,065	105	25,170	Yes
	North of Baseline Road	32,999	20,617	21,277	21,703	105	21,808	Yes
Linden Avenue	South of Renaissance Parkway	32,999	13,760	14,316	14,894	1,358	16,252	Yes
	Miro Way to Baseline Road	32,999	10,135	10,549	10,975	746	11,721	Yes
Renaissance Parkway	Linden Avenue to Ayala Drive	32,999	12,599	12,935	13,458	1,158	14,616	Yes
Notes: LOS = Level of Service; ADT = Average Daily Traffic; PCE = Passenger Car Equivalent								
Source: Appendix H								

Cumulative: Existing Plus Growth Plus Cumulative Projects

In addition to ambient growth, traffic volumes for Cumulative Projects (approved and pending projects) were added to the Existing Plus Growth 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. Traffic assumptions for Cumulative Projects were obtained from approved traffic studies, where available; or developed by Kimley-Horn. 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. The list of Cumulative Projects is available in **Appendix H**.

Intersection Levels of Service: As identified in **Table 26: Intersection Operations – Opening Year 2026 Cumulative Without Project**, with the addition of cumulative traffic, all study intersections would operate at an acceptable Level of Service.

Table 26: Intersection Operations – Opening Year 2026 Cumulative Without Project						
Int. #	Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS
1	Ayala Drive at SR-210 WB Ramps	S	32.4	C	31.0	C
2	Ayala Drive at SR-210 EB Ramps	S	20.4	C	30.9	C
3	Ayala Drive at Renaissance Parkway	S	22.8	C	34.3	C
4	Linden Avenue at Renaissance Parkway	S	30.7	C	36.3	D
5	Linden Avenue at Miro Way	S	7.9	A	10.4	B
6	Linden Avenue at Baseline Road	S	26.9	C	36.2	D
7	Ayala Drive at Baseline Road	S	32.0	C	35.2	D
D1	Linden Avenue at North Project Driveway	FUTURE INTERSECTION				
D2	Linden Avenue at South Project Driveway	FUTURE INTERSECTION				
D3	Ayala Drive at Scholl Way	FUTURE INTERSECTION				
D4	Ayala Drive at Project Driveway	FUTURE INTERSECTION				
Notes:						
<ul style="list-style-type: none"> ▪ Bold and shaded values indicate intersections operating at LOS E or F or significant impact to intersection per City standards. ▪ At a signalized intersection, delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. ▪ At a two-way stop-controlled intersection, delay refers to the average vehicle delay on the worst (highest delay) movement. 						
Delay values are based on the methodology outlined in the Highway Capacity Manual, (6th Edition).						
S = Signalized						
Source: Appendix H						

Roadway Levels of Service: As indicated in **Table 27: Roadway Analysis Opening Year 2026 – Cumulative Without Project**, all study area roadway segments would continue to operate at acceptable levels of service (LOS D or better) with the addition of cumulative traffic except for the following:

- Ayala Drive: SR-210 WB Ramps to SR-210 EB Ramps
- Ayala Drive: SR-210 EB Ramps to Renaissance Parkway

Roadway	Segment	LOS D Capacity	Existing Plus Growth ADT	Cumulative Projects ADT	Opening Year + Cum. Projects ADT	LOS D or Better?
Ayala Drive	SR-210 WB Ramps to SR-210 EB Ramps	32,999	30,994	6,615	37,609	No
	SR-210 EB Ramps to Renaissance Parkway	32,999	44,004	6,410	50,414	No
	South of Renaissance Parkway	32,999	25,065	3,210	28,275	Yes
	North of Baseline Road	32,999	21,703	3,210	24,913	Yes
Linden Avenue	South of Renaissance Parkway	32,999	14,894	35	14,929	Yes
	Miro Way to Baseline Road	32,999	10,975	35	11,010	Yes
Renaissance Parkway	Linden Avenue to Ayala Drive	32,999	13,458	3,200	16,658	Yes
Notes: LOS = Level of Service; ADT = Average Daily Traffic; PCE = Passenger Car Equivalent						
Source: Appendix H						

Opening Year 2026 Cumulative Plus Project

Intersection Levels of Service: As identified on **Table 28: Intersection Operations Opening Year 2026 – Cumulative Plus Project**, with the addition of project traffic, none of the study intersections would have a Project-related effect attributable to an increase in peak hour delay beyond the measure of significance, or a change in the Level of Service to fall below LOS D.

In this Plus Project analysis, each of the project site driveways were also analyzed. The results indicate that each driveway will operate at Level of Service D or better during both peak hours.

Table 28: Intersection Operations Opening Year 2026 – Cumulative Plus Project

Int. #	Intersection	Traffic Control	AM Peak Hour						PM Peak Hour					
			Without Project		With Project		Project Impact	Impact Sig?	Without Project		With Project		Project Impact	Impact Sig?
			Delay	LOS	Delay	LOS			Delay	LOS	Delay	LOS		
1	Ayala Drive at SR-210 WB Ramps	S	32.4	C	32.9	C	0.5	No	31.0	C	31.8	C	0.8	No
2	Ayala Drive at SR-210 EB Ramps	S	20.4	C	20.4	C	0.0	No	30.9	C	31.9	C	1.0	No
3	Ayala Drive at Renaissance Parkway	S	22.8	C	23.1	C	0.3	No	34.3	C	37.8	D	3.5	No
4	Linden Avenue at Renaissance Parkway	S	30.7	C	30.6	C	-0.1	No	36.3	D	37.8	D	1.5	No
5	Linden Avenue at Miro Way	S	7.9	A	7.6	A	-0.3	No	10.4	B	10.1	B	-0.3	No
6	Linden Avenue at Baseline Road	S	26.9	C	27.5	C	0.6	No	36.2	D	39.0	D	2.8	No
7	Ayala Drive at Baseline Road	S	32.0	C	32.3	C	0.3	No	35.2	D	35.4	D	0.2	No
D1	Linden Avenue at North Project Driveway	U	N/A		8.5	A	N/A		N/A		10.7	B	N/A	
D2	Linden Avenue at South Project Driveway	U	N/A		18.0	C	N/A		N/A		20.7	C	N/A	
D3	Ayala Drive at Scholl Way	U	N/A		6.6	A	N/A		N/A		6.3	A	N/A	
D4	Ayala Drive at Project Driveway	U	N/A		13.3	B	N/A		N/A		12.4	B	N/A	

- Notes:
- **Bold** and shaded values indicate intersections operating at LOS E or F or significant impact to intersection per City standards.
 - At a signalized intersection, delay refers to the average control delay for the entire intersection, measured in seconds per vehicle.
 - At a two-way stop-controlled intersection, delay refers to the average vehicle delay on the worst (highest delay) movement.
 - Delay values are based on the methodology outlined in the Highway Capacity Manual, (7th Edition).

S = Signalized
 U = Unsignalized

Source: **Appendix H**

Roadway Levels of Service: Roadway Level of Service analysis results for Opening Year 2024 Cumulative Plus Project conditions are shown on **Table 29: Roadway Operations Opening Year 2026 – Cumulative Plus Project**. Review of this table indicates that the following study roadway segments would operate at an unacceptable LOS:

- Ayala Drive: SR-210 WB Ramps to SR-210 EB Ramps
- Ayala Drive: SR-210 EB Ramps to Renaissance Parkway

Roadway	Segment	Opening LOS D Capacity	Opening Year + Cum. Projects ADT	Daily Project Traffic	Opening Year + Cum. Project + Project ADT	LOS D or Better?
Ayala Drive	SR-210 WB Ramps to SR-210 EB Ramps	32,999	37,609	526	38,135	No
	SR-210 EB Ramps to Renaissance Parkway	32,999	50,414	820	51,234	No
	South of Renaissance Parkway	32,999	28,275	105	28,380	Yes
	North of Baseline Road	32,999	24,913	105	25,018	Yes
Linden Avenue	South of Renaissance Parkway	32,999	14,929	1,358	16,287	Yes
	Miro Way to Baseline Road	32,999	11,010	746	11,756	Yes
Renaissance Parkway	Linden Avenue to Ayala Drive	32,999	16,658	1,158	17,816	Yes
Notes: LOS = Level of Service ADT = Average Daily Traffic Source: Appendix H						

The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. This Addendum finds that no new traffic impacts or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur with implementation of the proposed Project. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would alter the impact finding regarding traffic intersection and roadway segment impacts.

Based on the impact criteria in the City's Traffic Impact Analysis Report Guidelines and Requirements, the project-related impact would be considered significant at the following intersections:

- Linden Avenue at Renaissance Parkway
- Linden Avenue at Baseline Road
- Ayala Drive at Baseline Road

The following study roadway segments would exceed their daily LOS D roadway capacity based on a four-lane cross-section:

- Ayala Drive: SR-210 WB Ramps to SR-210 EB Ramps
- Ayala Drive: SR-210 EB Ramps to Renaissance Parkway

It should be noted that Ayala Drive is currently built to its ultimate roadway configuration as a Secondary Arterial, with two through lanes in each direction, at these roadway segments.

However, when the turn lane capacity is included at these segments, these segments would have the daily capacity of a six-lane roadway (49,499). When analyzed with the daily capacity of a six-lane roadway, both segments are expected to operate at LOS D or better.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

A Traffic Study was conducted for the proposed Project in compliance with Mitigation Measure **TRANS-1**. Mitigation Measure **TRANS-1** anticipated that as individual site-specific development proposals are considered by the City, such proposals may result in level of service impacts at intersections or result in other circulation impacts. Mitigation Measure **TRANS-1** requires that should those impacts be identified, the Project proponent would be required to provide either through construction of improvements or monetary contributions or both, for improvements listed in the 2016 RSPA Final SEIR to address those impacts. Based on the significance thresholds and LOS standards presented in the Traffic Study prepared for the Project (**Appendix H**), none of the study intersections or roadway segments require intersection or roadway improvements.

Project Mitigation Measures

No mitigation is required.

Conclusion

No new impacts associated with non-vehicular transportation or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would impact the prior finding.

Threshold (b) Exceed, either individually or cumulatively, level of service standard established by the county congestion management agency for designated roads or highways.

There are no Congestion Management Plan (CMP) intersections within the proposed Project's traffic study area.

Mitigation Program***2010 RSP Final EIR Mitigation Measures***

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

No new impact relative to CMP intersections or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would impact the prior finding.

Threshold (c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

The proposed Project is located on land that was once utilized by the Rialto Municipal Airport. The Rialto Municipal Airport closed in September 2014, thus, the proposed Project would no longer be within the Airport Influence Area of the Rialto Municipal Airport Comprehensive Land Use Plan (ACLUP). Therefore, the proposed Project would not adversely affect air traffic patterns. The 2016 RSPA Final SEIR determined that there would be no new or additional impacts related to air traffic patterns. Accordingly, no new impact or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would change the impact finding.

Mitigation Program***2010 RSP Final EIR Mitigation Measures***

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

No new impact relative to air traffic patterns or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would impact the prior finding of no impact.

Threshold (d) Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment).

The 2016 RSPA Final SEIR noted that the 2016 RSPA would not substantially increase hazards due to a design feature. Roadway and intersections designs under the 2016 RSPA project would be required to meet City roadway design criteria requirements through review by the Rialto Department of Public Works, as well as the County of San Bernardino Transportation Commission. The 2016 RSPA Final SEIR did not identify any significant impacts related to roadway hazards.

With respect to the proposed Project, roadways serving the project site are generally straight and flat. The site driveways and proposed Project improvements would be designed to provide adequate sight distance for drivers entering and exiting the project site. The roadway infrastructure surrounding the project site would be developed and/or expanded consistent with City standards and the 2016 RSPA design guidelines. The proposed Project would not introduce any new design features that would create hazards to traffic.

Vehicle access provisions for the project site would consist of two driveways on Linden Avenue and two driveways on Ayala Drive. Both Driveways on Linden Avenue would provide full-movement. One driveway on Ayala Drive would provide full-movement, and one driveway would provide exit-only access.

No new impact relative to traffic design hazards or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would impact the prior finding of no significant impact relative to roadway design.

Mitigation Program***2010 RSP Final EIR Mitigation Measures***

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

No new impact relative to traffic safety hazards or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would impact the prior finding of less than significant.

Threshold (e) Result in inadequate emergency access.

The Conceptual Circulation Plan in the 2010 RSP Final EIR identified that 2010 RSP implementation would include the development of roadways and signals that would provide adequate emergency access in all phases of development. The 2010 RSP Final EIR found that emergency access impacts would be less than significant. The 2016 RSPA Final SEIR determined that there would be no new or additional impacts related to emergency access.

Accordingly, no new impact relative to emergency access or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would impact the prior finding of no significant impact relative to the provision of emergency access.

Mitigation Program***2010 RSP Final EIR Mitigation Measures***

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

No new impacts associated with an increase in traffic conflicts or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would impact the prior finding.

Threshold (f) Result in inadequate parking capacity.

The parking standard and capacity for the 2016 RSPA has been developed in accordance with City of Rialto General Plan and Municipal Code requirements. Parking would be consistent with the Development Criteria identified in Section 3 of the 2016 RSPA. The Project would be required to provide 715 parking spaces and would provide 751 parking spaces. Consistent with the findings of the 2010 RSP Final EIR and 2016 RSPA Final SEIR, no impacts due to parking would occur.

The 2010 RSP Final EIR determined that the 2010 RSP met the minimum parking requirements for the City and impacts to parking capacity would be less than significant. The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. Accordingly, no new impact relative to site-specific parking requirements or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would impact the prior finding of no significant impact relative to parking.

Mitigation Program***2010 RSP Final EIR Mitigation Measures***

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

No new impacts associated with parking or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would impact the prior finding.

Threshold (g) Conflict with adopted policies, plans or programs supporting alternative transportation (e.g. bus turnouts, bicycle racks).

The circulation system for the 2016 RSPA provides multi-modal access to serve vehicles, bicycles, and pedestrians. Transit service to the Project area is provided via the OmniTrans routes 10, 22, and 312. OmniTrans Route 10 operates between the City of Fontana and the City of San Bernardino, traveling through Rialto along Baseline Road in the project vicinity. Route 10 operates on weekdays from 6:30 AM

to 7:30 PM with approximately 1-hour headways (the time between bus arrivals), on Saturdays from 6:20 AM to 7:00 PM with approximately 1-hour headways, and on Sundays from 7:10 AM to 6:00 PM with approximately 1-hour headways. OmniTrans Route 22 operates between the City of Rialto and the City of Colton through Rialto along Renaissance Parkway in the project vicinity. Route 22 operates on weekdays from 5:00 AM to 9:40 PM with approximately 1-hour headways, on Saturdays from 7:15 AM to 6:30 PM with approximately 1-hour headways, and on Sundays from 7:30 AM to 6:40 PM with approximately 1-hour headways. Route 22 has a transfer point with Route 10 at the intersection of Riverside Avenue and Baseline Road. OmniTrans Route 312 operates between the City of San Bernardino and the City of Fontana through Cal State San Bernardino and Rialto, along Renaissance Parkway and Linden Avenue in the project vicinity. Route 312 operates on weekdays from 5:20 AM to 10:30 PM with approximately 1-hour headways, on Saturdays and Sundays from 7:15 AM to 6:50 PM with approximately 1-hour headways.

The 2010 RSP Final EIR found that the development of the 2010 RSP would not conflict with alternative transportation due to the incorporation of pedestrian, bicycle and transit systems to provide opportunities for alternative forms of transportation in and near the 2010 RSP area. Impacts were determined to be less significant. The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR and would implement the pedestrian, bicycle, and transit systems analyzed in the 2010 RSP. Further, the proposed Project would not preclude the implementation of the non-vehicular circulation plan within the 2016 RSPA area. The 2016 RSPA Final SEIR determined that there would be no new or additional impacts related to policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. Consistent with the findings of the 2010 RSP Final EIR and 2016 RSPA Final SEIR, the proposed Project would not conflict with alternative transportation policies, plans, or programs for the area.

Accordingly, no new impact relative to non-vehicular transportation or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would impact the prior finding of no significant impact relative to non-vehicular transportation.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

No new impacts associated with non-vehicular transportation or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would impact the prior finding.

Overall Traffic Impact Conclusion

With regard to CEQA Guidelines Section 21166 and CEQA Guidelines Section 15162(a), the changes proposed by the Project would not result in any new impacts, or increase the severity of the previously identified impacts, with respect to traffic. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.18 Tribal Cultural Resources

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

As discussed in Section 4.5, *Cultural Resources*, Project implementation would not result in impacts to known cultural resources. The project site is located within Planning Areas 45, 46, 49a, 49c, 53, 54, and 60c of the 2010 RSP. Planning Area 60c was identified as a Planning Area which includes known cultural resources. Known cultural resources located within Planning Area 60c include Rialto Municipal Airport structures (see Table 4.5-2 of the 2010 RSP Final EIR). The previous Rialto Municipal Airport ceased operations in 2014, and the airport has since been demolished and the land has undergone mass grading. As such, the previously identified known cultural resources are no longer present within the project site. No impact would occur.

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

On July 1, 2015, Assembly Bill 52 (AB 52) amended CEQA to require that: 1) a lead agency provide notice to any California Native American tribes that have requested notice of projects proposed by the lead agency; and 2) for any tribe that responded to the notice within 30 days of receipt with a request for consultation, the lead agency must consult with the tribe. AB 52 requires lead agencies to consider whether a project may cause a substantial adverse change in the significance of a tribal cultural resource and to consider a tribe's cultural values when determining the appropriate environmental assessment, impacts and mitigation. AB 52 can draw upon SB 18's guidelines and can be completed in tandem.

Tribal cultural resources, as defined in Public Resources Code section 5020.1(k), have not been previously identified within the project site. The project site consists of vacant, previously disturbed land. The project site does not contain any existing structures or extant historical tribal cultural resources with the potential for inclusion on the California Register of Historical Resources or a local register.

AB 52 applies to projects with a Notice of Preparation (NOP) or notice of a Negative Declaration or Mitigated Negative Declaration issued on or after July 1, 2015. The CEQA process for the proposed Project began with the NOP, which was filed on January 8, 2015, prior to the adoption of the AB 52 requirements.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures were identified.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures were identified.

Project Mitigation Measures

No mitigation is required.

Conclusion

The proposed Project would result in less than significant impacts to tribal cultural resources.

Overall Tribal Resources Impact Conclusion

As tribal cultural resources were not evaluated in the 2016 RSPA Final SEIR or the 2010 RSP Final EIR, the changes proposed by the Project would not result in any new impacts, or increase the severity of the previously identified impacts, with respect to tribal cultural resources. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.19 Utilities and Service Systems

- Threshold a)** Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board; and
- Threshold b)** Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts; and
- Threshold e)** Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project's projected demand.

The City of Rialto provides wastewater services throughout the City, inclusive of the project site. The Public Works Department oversees the treatment of the City's wastewater and the maintenance sewer mains. The sanitary sewer system includes gravity sewer pipes, sewer lift stations, and sewage pressure pipes. This system conveys the wastewater to the Rialto Municipal Wastewater Treatment Plant located south of Santa Ana Avenue near the Rialto Channel. As discussed in the 2010 RSP, the Rialto Sewage Treatment Plant's processing capacity is approximately 11.7 million gallons per day (mgd), and the Plant's average throughput from January to August 2008 was 7.18 mgd. Therefore, the Plant operated on average at 61.4 percent of capacity. The RWQCB requires treatment plant expansions when a plant reaches 75 percent capacity.¹⁹ The City has plans to expand the treatment plant to 15 or 16 mgd.

The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. As indicated in the 2016 RSPA Final SEIR, the future land uses identified in the 2016 RSPA were consistent with the land uses analyzed in the 2010 RSP and available wastewater capacity was determined to be sufficient to accommodate the treatment requirements of the 2016 RSPA. Water supplies and treatment facilities for the RSPA are discussed later in this Addendum under Section 4.18, *Utilities and Service Systems* Threshold d). As discussed in that section, the proposed Project would have adequate water supplies and would not result in the new for new or expanded treatment facilities. The land uses proposed by the Project are consistent with those identified in the 2016 RSPA and analyzed in the RSP, thus impacts would be less than significant and are the same as those analyzed in the 2016 RSPA Final SEIR.

Mitigation Program

2010 RSP Final SEIR Mitigation Measures

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

¹⁹ City of Rialto. Final Environmental Impact Report for the Renaissance Specific Plan, Rialto, California. July 28, 2010; revised October 26, 2010 p. 4.16-9.

Conclusion

No new impact relative to wastewater or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would impact the prior finding of no significant impact.

Threshold c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which would cause significant environmental effects.

The proposed Project is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA Final SEIR. The 2016 RSPA Final SEIR concluded that the amount of stormwater that will flow into the Cactus Basin complex will actually decrease with build-out of the 2010 RSP when compared with existing conditions in the 2010 RSP area. The amount of decrease is anticipated to be approximately three percent. The reduction is anticipated due to improved facilities associated with build-out of the 2010 RSP area and the overall decrease in the amount of impervious areas (e.g. removal of former airport facilities, such as runways). As described in Section 4.9, *Hydrology and Water Quality*, under proposed conditions, the project site would be divided into three drainage areas which would be further divided into subareas that would utilize curb and gutter and curb inlets to convey runoff to the outfall locations. Each drainage area would utilize a proposed modular wetland system to treat the collected stormwater prior to discharging into the existing 60-inch RCP and eventually into Cactus Basin 4. Project implementation would not require the construction or expansion of existing storm drain facilities. Impacts would be less than significant.

Mitigation Program***2010 RSP Final EIR Mitigation Measures***

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

No new impact relative to storm water drainage or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would impact the prior finding of no significant impact.

Threshold d) Have insufficient water supplies available to serve the project from existing entitlements and resources, or new or expanded entitlements are needed.

The project site is located within the service area of the City of Rialto Water Services and is consistent with the residential development analyzed for the project site in the 2010 RSP Final EIR and 2016 RSPA

Final SEIR. City of Rialto Water Services water supply is produced from City-owned groundwater wells within the Rialto, Lytle Creek, Chino, North Riverside, and the Bunker Hill groundwater basins in the upper Santa Ana River Basin. The remainder of the water used by the City is purchased from the San Bernardino Valley Municipal Water District (SBVMWD) and Lytle Creek surface water treated at the Oliver P. Roemer Filtration Plant (WFF). The WFF is owned and operated by the West Valley Water District and the City of Rialto maintains a 25% ownership stake of the WFF.

The water supply assessment (WSA) prepared for the 2010 RSP Final EIR determined that water demand at build out of the 2010 RSP would be 4,543 acre-feet annually (AFA) with 1,356 AFA expected to be sourced from the City of Rialto, 3,068 AFA expected to be sourced from Fontana Water Company, and 1,019 AFA expected to be sourced from West Valley Water. However, water demand projections were adjusted in order to analyze impacts of the 2016 RSPA Final SEIR. As compared to the original projections of the 2008 WSA, the overall total projected water demand at build-out of the 2010 RSP, including the 2016 RSPA, was determined to be approximately 3,807 AFA, a projected reduced total demand of 736 AFA. Between the three water districts providing service in the 2010 RSP area, 456 AFA is expected to be sourced from the City of Rialto (10 AFA reduction), 2,342 AFA is expected to be sourced from Fontana Water Company (726 AFA reduction), and 1,019 AFA from West Valley Water (no change in AFA).

Based upon the WSA and taking into account multiple dry year periods as required by the provisions of the Water Code, the City's water supply is forecasted to be 20,100 AFY. The water demand for the 2016 RSPA, together with the water demand district-wide, was forecasted to be 14,356 AFY at buildout of the 2016 RSPA²⁰. Therefore, the City's Water Services total water supply exceeds the total district-wide water demand inclusive of the 2016 RSPA by 5,744 AFY.

Since preparation of the WSA for the 2010 RSP Project, the City of Rialto has updated its Urban Water Management Plan (UWMP) that discloses information on water quality and water supply within its jurisdiction. The City's 2020 UWMP was approved in June 2021. The 2020 UWMP accounted for full buildout of the 2010 RSP in its water demand projections. The overall total projected water demand at build-out of the RSP, including the 2016 RSPA, was determined to be approximately 3,807 AFA and accounted for the residential uses and associated water demand of the project site.

Taking account multiple dry year periods as required by the provisions of the Water Code, the City's forecasted annual water supply is sufficient to meet the anticipated demand of the proposed Project, the remainder of the RSP, and the overall district-wide demand. The City concluded that no new supplies or expanded entitlements for water would be required by the City to serve the Project.

In conclusion, the City's water supply would be sufficient to address the water supply demand and would not result in new significant effects or a substantial increase in the severity of a previously addressed impact. The information presented in the UWMP also confirms the availability of the City's water supply to address the estimated water demands and no new impacts with respect to water supply have been identified.²¹

Accordingly, no new impact relative to water supply or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time

²⁰ Ibid. p 4.16-12.

²¹ San Bernardino Valley Municipal Water District. (2021).

<https://www.sbvmd.com/home/showpublisheddocument/9242/637614374631830000>. Accessed October 2024.

the 2016 RSPA Final SEIR was certified is available that would impact the prior finding of no significant impact related to the provision of water.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation measures are applicable.

2016 RSPA Final SEIR Mitigation Measures

No mitigation measures are applicable.

Project Mitigation Measures

No mitigation is required.

Conclusion

No new impact relative to utilities and service systems or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would impact the prior finding of no significant impact to utilities and service systems.

Threshold f) Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs; and

Threshold g) Not comply with federal, state, and local statutes and regulations related to solid waste.

Implementation of the proposed 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 be expected to result in inadequate landfill capacity. 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 (2390 N. Alder Avenue) located approximately 1.3 miles west of the project site. 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 54.2 million cubic yards.²² The landfill has an expected operational life through 2045 with the potential for vertical, or downward expansion.²³ The landfill has potential for a vertical, or downward expansion, but not a lateral expansion. The residential uses proposed by the Project would not result in a substantial increase in solid waste as they are consistent with the uses analyzed in the 2016 RSPA Final SEIR. For these reasons, the proposed Project's solid waste disposal needs can be met by an existing landfill and associated impacts are less than significant.

The proposed Project, as with all other development in the City, would be required to adhere to City ordinances with respect to waste reduction and recycling. As a result, no impacts related to State and local statutes governing solid waste are anticipated.

²² California Department of Resources Recycling and Recovery. (2024). SWIS Facility/Site Activity Details. Available at: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1880?siteID=2662>. Accessed September 2025.

²³ City of Rialto. (2010). Final Environmental Impact Report for the Renaissance Specific Plan

No potentially significant impacts to utilities and service systems are identified in the 2016 RSPA Final SEIR. The proposed Project is located within the limits of the 2016 RSPA area and the residential uses proposed by the Project are consistent with the uses analyzed in the 2016 RSPA Final SEIR and would not result in a substantial increase in solid waste resulting from implementation of the proposed Project. Thus the proposed Project is consistent with the prior assumptions related to solid waste. Therefore, no new impact related to solid waste beyond what was addressed in the 2016 RSPA Final SEIR would occur.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation is required.

2016 RSPA Final SEIR Mitigation Measures

No mitigation is required.

Project Mitigation Measures

No mitigation is required.

Conclusion

No new impact relative to utilities and service systems or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would impact the prior finding of no significant impact to utilities and service systems.

Overall Utility and Service Systems Impact Conclusion

With regard to CEQA Section 21166 and CEQA Guidelines Section 15162(a), the changes proposed by the Project would not result in any new impacts, or increase the severity of the previously identified impacts, with respect to utilities and service systems. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.20 Wildfire

The topic of Wildfire was not addressed in the 2010 RSP Final EIR or the 2016 RSPA Final SEIR 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 2016 RSPA SEIR by the Rialto City Council in June 2016.

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 Fire Hazard Severity Zone (FHSZ) within a Local Responsibility Area (LRA).²⁴ Therefore, no impacts associated with wildfire as a result of Project implementation would occur.

Mitigation Program

2010 RSP Final EIR Mitigation Measures

No mitigation is required.

2016 RSPA Final SEIR Mitigation Measures

No mitigation is required.

Project Mitigation Measures

No mitigation is required.

Conclusion

No new impact relative to wildfires or a substantial increase in the severity of a previously identified significant impact evaluated in the 2016 RSPA Final SEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the 2016 RSPA Final SEIR was certified is available that would impact the prior finding of no significant impact to wildfire.

²⁴ California Department of Forestry and Fire Protection (Cal Fire). (2024). Fire Hazard Severity Viewer. <https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/>. Accessed October 2024.

5 DETERMINATION OF APPROPRIATE CEQA DOCUMENTATION

The following discussion lists the appropriate subsections of Sections 15162 and 15164 of the State CEQA Guidelines and provides justification for the City of Rialto to make a determination of the appropriate CEQA document for the proposed Project, based on the environmental analysis provided above.

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 of 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 City of Rialto proposes to implement the proposed Project within the context of the 2016 RSPA Final SEIR prepared for the 2016 RSPA, as described in this Addendum. As discussed in the Environmental Impact Analysis section of this Addendum, no new or substantially more severe significant environmental effects beyond what was evaluated in the 2016 RSPA Final SEIR would occur.

- (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.

As documented herein, no circumstances associated with the location, type, setting, or operations of the proposed Project have substantively changed beyond what was evaluated in the 2016 RSPA Final SEIR; and none of the proposed Project elements would result in new or substantially more severe significant environmental effects than previously identified. No major revisions to the 2016 RSPA Final SEIR are required.

- (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;

No new significant environmental effects beyond those addressed in the 2016 RSPA Final SEIR were identified.

- (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

Significant Project-related effects previously examined would not be substantially more severe than were disclosed in the 2016 RSPA Final SEIR as a result of the proposed Project. Impacts associated with Air Quality, Noise, Transportation/Traffic, and GHG Emissions (Climate Change) would be the same as or less than disclosed in the adopted 2016 RSPA Final SEIR. Significant adverse impacts would be avoided through the implementation of mitigation measures identified in the 2016 RSPA Final SEIR relative to Aesthetics, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, and

Hydrology and Water Quality, and Utilities. Implementation of the proposed Project 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 certified 2016 RSPA Final SEIR.

- (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 other mitigation measures or feasible alternatives have been identified that would substantially reduce significant 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 subsection (a). Otherwise, the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.

Subsequent to certification of the Final EIR in November 2010, 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 nor would it substantially increase the severity of significant effects previously identified in the 2016 RSPA Final SEIR. 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 subsection (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. 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 certified Final 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 final EIR or adopted negative declaration.

This Addendum will be attached to the Final SEIR and maintained in the administrative record files at the City of Rialto.

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

The City of Rialto will consider this Addendum with the Final SEIR 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.

6 CONCLUSION

This Addendum has been prepared in accordance with the provisions of the State CEQA Guidelines to document the finding that none of the conditions or circumstances that would require preparation of a subsequent EIR, pursuant to Sections 15162 and 15164 of the State CEQA Guidelines, exist in connection with the proposed Project. No major revisions would be required to the 2016 RSPA Final SEIR prepared for the 2016 RSPA as a result of the proposed Project. No new significant environmental impacts have been identified. Since the certification of the 2016 RSPA Final SEIR, there has been no new information showing that mitigation measures or alternatives once considered infeasible are now feasible, or showing that there are feasible new mitigation measures or alternatives substantially different from those analyzed in the 2016 RSPA Final SEIR that the City declined to adopt. Therefore, preparation of a subsequent EIR is not required and the appropriate CEQA document for the proposed Project is this Addendum to the 2016 RSPA Final SEIR. No additional environmental analysis or review is required for the proposed Project. This document will be maintained in the administrative record files at City of Rialto offices.

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