

DRAFT

Walnut/Alder Warehouse Project Initial Study/Mitigated Negative Declaration

Prepared for:

City of Rialto

Development Services Department, Planning Division

150 S. Palm Avenue

Rialto, California 92376

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ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
AB	Assembly Bill
ACM	asbestos-containing material
ADT	average daily trips
AQMP	Air Quality Management Plan
APN	Assessor's Parcel Number
BMP	best management practice
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
CALGAPS	California GHG Analysis of Policies Spreadsheet
Caltrans	California Department of Transportation
CA MUTCD	<i>California Manual of Uniform Traffic Control Devices</i>
CARB	California Air Resources Board
CDOC	California Department of Conservation
CEQA	California Environmental Quality Act
City	City of Rialto
CJUSD	Colton Joint Unified School District
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CRHR	California Register of Historical Resources
dBA	A-weighted decibels
DPM	diesel particulate matter
EIR	environmental impact report
EPA	U.S. Environmental Protection Agency
ESA	Environmental Site Assessment
FUSD	Fontana Unified School District
FWC	Fontana Water Company
GHG	greenhouse gas
I-	Interstate
IEUA	Inland Empire Utilities Agency
IS	initial study
LID	low-impact development
LOS	level of service
LST	localized significance threshold
MGD	million gallons per day
MM	Mitigation Measure
MND	mitigated negative declaration

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Acronym/Abbreviation	Definition
MT CO ₂ e	metric tons of carbon dioxide equivalent
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NO _x	oxides of nitrogen
NO ₂	nitrogen dioxide
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
OSHA	Occupational Safety and Health Administration
Pb	lead
PCE	passenger car equivalent
PM _{2.5}	particulate matter less than or equal to 2.5 microns in diameter
PM ₁₀	particulate matter less than or equal to 10 microns in diameter
ppm	parts per million
PRC	Public Resources Code
RFD	Rialto Fire Department
RPD	Rialto Police Department
RTP	Regional Transportation Plan
RUSD	Rialto Unified School District
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SO _x	sulfur oxides
SO ₂	sulfur dioxide
SR-	State Route
TIA	Traffic Impact Analysis
UWMP	Urban Water Management Plan
VOC	volatile organic compound
VMT	vehicle miles traveled
WQMP	Water Quality Management Plan

1 INTRODUCTION

1.1 Project Overview

The City of Rialto (City) received an application from CH Realty VIII/I Rialto Alder North, L.P. (project applicant) requesting the following approvals for development of the Walnut/Alder Warehouse project (proposed project):

- Conditional Use Permit No. 2018-0001
- Tentative Parcel Map No. 2018-0002
- Precise Plan of Design No. 2018-0005
- Master Case No. 2018-0005

The proposed project includes construction of an approximately 188,712-square-foot one-story industrial/warehouse building (inclusive of 2,471 square feet of mezzanine space) on an approximately 9-acre property located in the northwest part of the City. The project site is composed of three parcels (Assessor's Parcel Numbers (APNs) 0240-201-60, 0240-201-02, and 0240-201-31). In addition to the industrial/warehouse building, the project would include landscaping areas, loading docks, and surface parking spaces for passenger vehicles and truck trailers.

The project is the subject of analysis in this document pursuant to the California Environmental Quality Act (CEQA). In accordance with CEQA Guidelines, Section 15367, the City is the lead agency with principal responsibility to consider the project for approval.

1.2 California Environmental Quality Act Compliance

CEQA, a statewide environmental law contained in California Public Resources Code (PRC), Sections 21000–21177, applies to most public agency decisions to carry out, authorize, or approve actions that have the potential to adversely affect the environment (PRC Section 21000 et seq.). The overarching goal of CEQA is to protect the physical environment. To achieve that goal, CEQA requires that public agencies identify the environmental consequences of their discretionary actions and consider alternatives and mitigation measures that could avoid or reduce significant adverse impacts when avoidance or reduction is feasible. It also gives other public agencies and the public an opportunity to comment on the information. If significant adverse impacts cannot be avoided, reduced, or mitigated to below a level of significance, the public agency is required to prepare an Environmental Impact Report (EIR) and balance the project's environmental concerns with other goals and benefits in a statement of overriding considerations.

1.3 Preparation and Processing of this CEQA Document

The City's Development Services Department, Planning Division, directed and supervised the preparation of this Initial Study/Mitigated Negative Declaration (IS/MND). Although prepared with assistance from the consulting firm Dudek, the content contained within and the conclusions drawn by this IS/MND reflect the independent judgment of the City.

1.4 Public Review Process

Public participation is an essential part of the CEQA process. As required by CEQA, the City shall provide adequate time for other public agencies and members of the public to review and comment on a CEQA document that has been prepared. This IS/MND has been made available to members of the public, agencies, and interested parties for a 20-day public review period in accordance with CEQA Guidelines Section 15105. Public review of the IS/MND is intended to focus "on the proposed finding that the project will not have a significant effect on the environment. If persons and public agencies believe that the project may have a significant effect, they should: (1) identify the specific effect, (2) explain why they believe the effect would occur, and (3) explain why they believe the effect would be significant." (14 CCR 15204).

This IS/MND is available for review during the 20-day public review period at the following locations.

In-Person

City of Rialto
Development Services Department, Planning Division
150 S. Palm Avenue
Rialto, California 92376

Online

<http://yourrialto.com/city-hall/departments/development-services-department/>

Once the 20-day public review period has concluded, any advisory body of a public agency shall consider the IS/MND together with any comments received during the public review process. The decision-making body shall adopt the proposed IS/MND if it finds there is no substantial evidence that the proposed project will have a significant effect on the environment and that the IS/MND reflects the lead agency's independent judgment and analysis. After approval of the proposed project, the City shall file a Notice of Determination at the San Bernardino County Recorder-Clerk's office within five working days after deciding to carry out or approve the proposed project.

1.5 Initial Study Checklist

Dudek, under the City's guidance, prepared the proposed project's Environmental Checklist (i.e., Initial Study) per CEQA Guidelines, Sections 15063–15065. The CEQA Guidelines include a suggested checklist to indicate whether a project would have an adverse impact on the environment. The checklist is found in Section 3 of this document. Following the Environmental Checklist, Sections 3.1 through 3.19 include an explanation and discussion of each significance determination made in the checklist for the proposed project.

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

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

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

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2 PROJECT DESCRIPTION

2.1 Project Location

The project site is located in the northwest part of the City in the southwestern portion of San Bernardino County. Regionally, the City is bordered by unincorporated Riverside County and the Cajon Pass to the north, the Cities of San Bernardino and Colton to the east, unincorporated Riverside County and the City of Riverside to the south, and the City of Fontana to the west. Locally, the project site is bounded by Walnut Avenue and industrial/warehouse uses to the north, Alder Avenue and industrial/warehouse uses to the east, and future industrial/warehouse uses (currently planned/under construction) to the south and west (Figure 1). The project site is composed of three parcels (APNs 0240-201-60, 0240-201-02, and 0240-201-31). APNs 0240-201-60 and 0240-201-02 are currently undeveloped, while APN 0240-201-31 contains an existing single-family residence.

2.2 Environmental Setting

City of Rialto

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

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

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

Renaissance Specific Plan

The project site is located within the boundaries of the City's Renaissance Specific Plan. The Renaissance Specific Plan is designed as a master-planned community on approximately 1,439

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acres that upon buildout will contain a variety of logistics, employment, business, shopping, as well as residential and community facilities that are integrated by open spaces and amenities. The Renaissance Specific Plan serves as the long-range plan for the development of Rialto and the guide to all future development proposals within the Specific Plan area. The Specific Plan provides detailed text and exhibits describing the various land uses, amenities, and infrastructure improvements envisioned for the community. This IS/MND will guide the build-out of the property in a manner consistent with City and state policies and standards to ensure that the various community elements identified in the Specific Plan will be developed in a coordinated manner (City of Rialto 2010b).

Project Site

The approximately 9-acre, rectangular-shaped project site is located on the southwest corner of Walnut Avenue and Alder Avenue (Figure 2). The project site is composed of three parcels (APNs 0240-201-60, 0240-201-02, and 0240-201-31). APNs 0240-201-60 and 0240-201-02 are currently undeveloped, while APN 0240-201-31 contains an existing single-family residence. Other than this residence, small soil and debris stockpiles are found on the project site.

The project site has been generally undeveloped since 1986. The existing single-family residence was constructed circa 1949. Another small structure was once constructed in the center of the project site around 1953; however, this previous structure was demolished by 1966. The project site has been graded at least once circa 2005.

The geology of the project site and surrounding vicinity is characterized as silty sand with gravel, cobbles, and occasional boulders. The project site is located in the upper Santa Ana Valley, north of the San Gabriel Mountains. According to the Geologic Map of the Devore Quadrangle, the surficial sediments consist of alluvial gravel and sand of valley areas, composed of boulder gravel near mountains, grading outward into finer sand. The project site is located within the Santa Ana River Groundwater Basin, which underlies a portion of the upper Santa Ana Valley. The subbasin is bounded by the San Gabriel Mountains to the north, the Box Spring Mountains to the south, and the Rialto–Colton fault to the west.

Regional topography slopes south to southeast. The project site topography tends to descend very gently from northeast to southwest and drainage is via sheet flow in this direction. The site is at an elevation of approximately 1,450 above mean sea level.

The City's General Plan Existing Land Use Map designates the project site as Specific Plan (Figure 3). The City's Zoning Map designates the project site as Renaissance Specific Plan (Figure 4). Specifically, the Renaissance Specific Plan Land Use designates the site as 14-

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Employment (Figure 5). Regional access to the project area is provided by SR-210 to the north of the project site, I-15 to the west, and I-215 to the east.

Surrounding Land Uses

The project site is located within a quickly developing part of the City and is surrounded by a mix of urbanized land uses. Specific land uses in the immediate project area include the following:

- **North:** Walnut Avenue and industrial/warehouse uses
- **East:** Alder Avenue and industrial/warehouse uses
- **South:** Future industrial/warehouse uses (currently planned/under construction)
- **West:** Future industrial/warehouse uses (currently planned/under construction)

2.3 Proposed Project

The proposed project would include construction of 188,712 square feet (gross area, inclusive of mezzanine/office spaces), one-story industrial/warehouse building on an approximately 9-acre site (gross area). The industrial/warehouse building would be composed of approximately 188,712 square feet of warehouse space (inclusive of 2,471 square feet of mezzanine space). The proposed project would also include approximately 60,000 square feet of landscaping, 129 passenger vehicle parking spaces, 22 loading docks, and 34 truck parking spaces. The project would not contain any cold storage space and would have a clear height of 36 feet.

On-Site and Off-Site Adjacent Improvements

The project would also include improvements to Walnut Avenue and Alder Avenue along the project's street frontage, including a landscape, sidewalk, and parkway improvements. A variety of trees, shrubs, plants, and land covers would be planted within the project frontage's landscape setback area, as well as within the landscape areas found around the proposed industrial/warehouse building and throughout the project site.

Site Access, Circulation, and Parking

Access to the project site would be provided by three driveways: a full-access driveway at the northwest corner of the project site off Walnut Avenue, a full-access driveway at the northeast part of the project site off Walnut Avenue (for passenger vehicles only), and a right-in/right-out driveway at the southeast corner of the project site off Alder Avenue. Paved passenger vehicle parking areas would be provided along the northern and eastern sides of the project site, while truck parking would be located along the western side of the project site. Gated entry is proposed on both sides of the main truck parking and dock areas. The project site would include 129

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passenger vehicle parking spaces, 22 loading docks, 34 trailer parking spaces, and a secure bicycle storage area.

Storm Drain and Other Utility Improvements

The proposed project would include a detention/infiltration basin on the property to capture and infiltrate stormwater runoff. All proposed surface waters would flow into on-site catch basins and down drains/area drains. All proposed stormwater would flow into proposed perforated 72-inch chambers, and then infiltrated into the existing soils. All catch basin and curb inlets would be outfitted with trash racks and filter inserts to provide preliminary treatment prior to out letting into the water quality basins or infiltration systems. Stormwater flows will pass through the infiltration facilities and will then flow through to the public system via sub-surface piping (Appendix F).

Preventive low-impact development (LID) site design practices have been incorporated into the proposed project to maintain the historic drainage pattern by utilizing the same drainage paths and outlets, with the detention/infiltration basins limiting outlet of stormwater to the project site's pre-development condition.

2.4 Project Construction and Phasing

The project applicant intends to construct the project in a single continuous phase, starting early 2019. It is anticipated that construction would take approximately 16 months. Table 1 provides the tentative project construction schedule, as used in the air quality, greenhouse gas (GHG) emissions, and health risk assessment impact analysis (see Sections 3.3 and 3.7 of this IS/MND; also see Appendix A).

Table 1
Tentative Project Construction Schedule

Phase Name	Phase Start Date	Phase End Date	No. of Days
Demolition	01/07/2019	02/01/2019	20
Site preparation	02/02/2019	02/15/2019	10
Grading	02/16/2019	03/15/2019	20
Building construction	03/16/2019	01/31/2020	230
Paving	02/01/2020	02/28/2020	20
Architectural coating	02/29/2020	05/08/2020	50

Source: Appendix A.

2.5 Project Approvals

The following discretionary approvals would be required before implementing the project. This list is preliminary and may not be comprehensive:

- Conditional Use Permit No. 2018-0001
- Tentative Parcel Map No. 2018-0002
- Precise Plan of Design No. 2018-0005
- Master Case No. 2018-0005

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3 INITIAL STUDY CHECKLIST

1. Project title:

Walnut/Alder Warehouse Project

2. Lead agency name and address:

City of Rialto
Development Services Department, Planning Division
150 S. Palm Avenue
Rialto, California 92376

3. Contact person and phone number:

Daniel Rosas, Assistant Planner
909.820.2525

4. Project location:

The project site is located in the northwest part of the City of Rialto in the southwestern portion of San Bernardino County, California. Regionally, the City is bordered by unincorporated Riverside County and the Cajon Pass to the north, the Cities of San Bernardino and Colton to the east, unincorporated Riverside County and the City of Riverside to the south, and the City of Fontana to the west. Locally, the project site is bounded by Walnut Avenue and industrial/warehouse uses to the north, Alder Avenue and industrial/warehouse uses to the east, and future industrial/warehouse uses (currently planned/under construction) to the south and west. The approximately 9-acre, rectangular-shaped project site is located on the southwest corner of Walnut Avenue and Alder Avenue. The project site is composed of three parcels (APNs 0240-201-60, 0240-201-02, and 0240-201-31). APNs 0240-201-60 and 0240-201-02 are currently undeveloped, while APN 0240-201-31 contains an existing single-family residence.

5. Project sponsor's name and address:

CH Realty VIII/I Rialto Alder North, L.P.

6. General plan designation:

Specific Plan

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7. Zoning:

Renaissance Specific Plan – 14 Employment

8. Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):

The proposed project includes construction of an approximately 188,712-square-foot (inclusive of 2,471 square feet of mezzanine space), one-story industrial/warehouse building on an approximately 9-acre property located in the northwest part of the City. The project site is composed of three parcels (APNs 0240-201-60, 0240-201-02, and 0240-201-31). In addition to the industrial/warehouse building, the project would include landscaping areas, loading docks, and surface parking spaces for passenger vehicles and truck trailers.

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

The project site is located within a quickly developing part of the City and is surrounded by a mix of urbanized land uses. Specific land uses in the immediate project area include the following:

- **North:** Walnut Avenue and industrial/warehouse uses
- **East:** Alder Avenue and industrial/warehouse uses
- **South:** Future industrial/warehouse uses (currently planned/under construction)
- **West:** Future industrial/warehouse uses (currently planned/under construction).

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

- Rialto Fire Department: Site Plan Review
- Rialto Police Department: Site Plan Review
- County of San Bernardino (National Pollutant Discharge Elimination System (NPDES) General Construction Permit)

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

Yes. Refer to Section 3.17 for additional details.

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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact,” as indicated by the checklist on the following pages.

- | | | |
|---|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology and Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards and Hazardous Materials | <input type="checkbox"/> Hydrology and Water Quality |
| <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation and Traffic | <input type="checkbox"/> Tribal Cultural Resources | <input type="checkbox"/> Utilities and Service Systems |
| <input type="checkbox"/> Mandatory Findings of Significance | | |

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DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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11. The significance criteria or threshold, if any, used to evaluate each question; and
12. The mitigation measure identified, if any, to reduce the impact to less than significance.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.1 Aesthetics

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

Less-than-Significant Impact. Scenic vistas and other important visual resources are typically associated with natural landforms such as mountains, foothills, ridgelines, coastlines, and open space areas. The City’s General Plan Open Space and Conservation Element states that, “the views of the San Gabriel and San Bernardino Mountains and the foothills provide the perfect backdrop for creating scenic vistas throughout the City,” and “the City should take great care in ensuring that building heights and scale of projects do not hinder or impede scenic view” (City of Rialto 2010a).

The San Gabriel Mountains and the San Bernardino Mountains are located approximately 4-plus miles to the north and east, and the Jurupa Mountains and foothills are found roughly 6 miles to the south. Based on these distances, as well as the presence of existing intervening natural topographical variations and manmade urban features, the project site is not located within the direct viewshed of these scenic vistas. In addition, the proposed project would be approximately 32 feet tall, similar to the heights of other industrial/warehouse buildings surrounding the project site. As such, the proposed project is not expected to block views of or from these scenic resources. Therefore, impacts associated with scenic vistas would be less than significant.

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

No Impact. According to the California Department of Transportation (Caltrans) California Scenic Highway Mapping System (Caltrans 2016), the only officially designated state scenic highway in San Bernardino County is a 16-mile portion of SR-38 from South Fork Campground to State Lane. This roadway segment is located more than 14 miles southeast of the project site. Based on the distance between this officially designated state scenic highway, and because of the intervening natural topography and urban improvements between this roadway segment and the project site, the project would not be located within the viewshed of this officially designated state scenic highway. In addition, the Rialto General Plan does not identify any designated scenic corridors. Therefore, no impact associated with scenic highways would occur.

- c) *Would the project substantially degrade the existing visual character or quality of the site and its surroundings?*

Short-Term Construction Impacts

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

Long-Term Operational Impacts

Less-than-Significant Impact. The project site is located in an urbanized, industrial portion of the City and is bound by existing and future development in all directions. The project site currently consists predominantly of undeveloped land, although a smaller portion of the site contains an existing single-family residence. Other than this residence, small soil and debris stockpiles are found on the project site. The proposed project would alter the land use and development intensity on the project site, thus altering the existing visual character of the site compared with the existing conditions.

However, as a warehouse building, the proposed project would be visually consistent with the existing industrial development. The proposed project would be approximately 32 feet tall, similar to the heights of other industrial/warehouse buildings surrounding the project site. In addition, at 188,712 square feet, the proposed project would be of similar size and scale – if not smaller – compared with the existing surrounding development in

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the project area. Thus, the development of the proposed project would not represent an adverse or detrimental impact on existing on- or off-site visual character.

Regarding visual quality, the project would incorporate similar architectural elements, including a complementary neutral color palette and a variety of building materials, to existing development located in the project area. The project was designed to include vertical and horizontal elements that would break up the overall massing of the buildings and provide visual interest. Setback landscape areas along the project frontages would also soften views of the project site and enhance the visual quality of the project.

The warehouse building and associated improvements were designed with a strong and appropriately scaled framework of architectural and landscape architecture elements. The building mass and landscaping throughout the project site were designed to create a sense of unity both on and off site. High-quality development features would be provided through site design (e.g., building orientation, screening, and placement of service areas), architecture (e.g., mass, scale, form, style, material, and color), and streetscape elements (e.g., lighting, paving materials). Overall, the project would enhance and strengthen the existing quality of the project site through new landscaping, hardscape, and other improvements both on site and along the public right-of-way.

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

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

Short-Term Construction Impacts

No Impact. In compliance with the City's Noise Ordinance, between October 1 and April 30, construction activities of the proposed project would be limited to between 7 a.m. and 5:30 p.m., Monday through Friday, and between 8 a.m. and 5 p.m., Saturdays; no construction work is permissible on Sundays or state holidays. Between May 1 through September 30, construction work is limited to between 6 a.m. and 7 p.m., Monday

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through Friday, and 8:00 a.m. to 5:00 p.m. Saturdays; again, construction work is not permissible on Sundays or state holidays (City of Rialto 2008). As such, project construction would be limited to the daytime hours, and nighttime lighting would not be required until the project is operational. Therefore, no short-term construction impacts associated with light and glare would occur.

Long-Term Operational Impacts

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

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

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.2 Agriculture and Forestry Resources

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

No Impact. According to the California Department of Conservation (CDOC) Important Farmland Finder (CDOC 2016a), the northern portion of the project site is identified as “Urban and Built-Up Land” and the southern portion of the project site is designated as “Other Land.” The project site does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (collectively, “Important Farmland”). The proposed project would not occur within any farmland locations, and would not result in the conversion of Prime or Unique Farmland, or Farmland of Statewide Importance. Therefore, no impacts associated with the conversion of Important Farmland would occur.

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

No Impact. According to the CDOC’s 2015/2016 San Bernardino County Williamson Act Map, there are no Williamson Act lands on or within the project area (CDOC 2016b). In addition, the project site is within the Renaissance Specific Plan – 14 Employment, and none of the parcels surrounding the project site are zoned for agricultural use. Therefore, no impacts associated with agricultural zoning or Williamson Act contracts would occur.

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

No Impact. According to the California Department of Forestry and Fire Protection (CAL FIRE) Management Landscape map (CAL FIRE 2003), no public or private land

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managed for timber is located in the project area. The project site is not zoned as forest land or Timberland Production. Therefore, no impacts associated with forest land or timberland would occur.

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

No Impact. Refer to response to Impact 3.2(c).

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

No Impact. Refer to responses to Impacts 3.2(a) through 3.2(c).

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.3 Air Quality

The following analysis is based on the Walnut/Alder Warehouse Project Air Quality Impact Analysis, Greenhouse Gas Analysis, and Mobile Source Health Risk Assessment prepared by Urban Crossroads, and included as Appendix A.

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Regional Air Quality

The project site is located in the South Coast Air Basin (SCAB) within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). SCAB includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. Existing air quality is measured at established SCAQMD air quality monitoring stations. Monitored air quality is evaluated in the context of ambient air quality standards. These standards are the levels of air quality that are considered safe, with an adequate margin of safety, to protect the public health and welfare. National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) currently in effect are used to determine whether a region's air quality is healthful or unhealthful. The determination is made by comparing contaminant levels in ambient air samples in a region to the state and federal standards. Table 2 provides the federal and state ambient air quality attainment designation (NAAQS and CAAQS) for applicable criteria pollutants within SCAB.

Table 2
South Coast Air Basin Attainment Status

Pollutant	State Designation (CAAQS)	Federal Designation (NAAQS)
Ozone – 1-hour standard	Nonattainment	Nonattainment (“extreme”)
Ozone – 8-hour standard	Nonattainment	Nonattainment (“extreme”)
PM _{2.5}	Nonattainment	Nonattainment (“serious”)
PM ₁₀	Nonattainment	Attainment (maintenance)
CO	Attainment	Attainment (maintenance)
NO ₂	Attainment	Attainment/Unclassifiable
SO ₂	Attainment	Attainment/Unclassifiable
Pb ¹	Attainment	Nonattainment (partial)

Source: CARB 2017 (see Appendix A for a detailed map of State/National Area Designations within the SCAB)

Notes: CAAQS = California Ambient Air Quality Standards; NAAQS = National Ambient Air Quality Standards; PM_{2.5} = particulate matter less than or equal to 2.5 microns in diameter; PM₁₀ = particulate matter less than or equal to 10 microns in diameter; CO = carbon monoxide; NO₂ = nitrogen dioxide; SO₂ = sulfur dioxide; Pb = lead.

¹ The federal nonattainment designation for lead is only applicable towards the Los Angeles County portion of SCAB.

As shown in Table 2, SCAB has been designated by the U.S. Environmental Protection Agency (EPA) as a federal nonattainment area for ozone (O₃) and particulate matter less than or equal to 2.5 microns in diameter (PM_{2.5}), and partial nonattainment for lead. Currently, SCAB is in attainment with the NAAQS for carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and particulate matter less than or equal to 10 microns in diameter (PM₁₀). SCAB has been designated by the California Air Resources Board (CARB) as a nonattainment area for O₃, PM₁₀, and PM_{2.5}. SCAQMD is the agency responsible for air pollution control within SCAB. SCAQMD works directly with the Southern California Association of Governments (SCAG),

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county transportation commissions, and local governments, and cooperates actively with all federal and state agencies.

Local Air Quality

Relative to the project site, the nearest long-term air quality monitoring site for O₃, CO, NO₂, and PM₁₀ is the SCAQMD Central San Bernardino Valley 1 (Source Receptor Area 34) monitoring station, located approximately 4.29 miles southwest of the project site.

Table 3 identifies the number of days ambient air quality was exceeded for the Air Quality Analysis study area, which is considered to be representative of the local air quality at the project site.

Table 3
Project Area Air Quality Monitoring Summary 2014–2016

Pollutant	Standard	Year		
		2014	2015	2016
O ₃				
Maximum 1-Hour Concentration (ppm)		0.127	0.133	0.139
Maximum 8-Hour Concentration (ppm)		0.105	0.111	0.105
Number of Days Exceeding State 1-Hour Standard	>0.09 ppm	31	36	34
Number of Days Exceeding State 8-Hour Standard	>0.07 ppm	52	59	52
Number of Days Exceeding Federal 1-Hour Standard	>0.12 ppm	1	3	3
Number of Days Exceeding Federal 8-Hour Standard	>0.075 ppm	52	57	49
Number of Days Exceeding Health Advisory	≥0.15 ppm	—	—	—
CO				
Maximum 1-Hour Concentration (ppm)		3.0	2.8	1.7
Maximum 8-Hour Concentration (ppm)		1.2	1.2	1.0
NO ₂				
Maximum 1-Hour Concentration (ppm)		0.070	0.079	0.072
Annual Arithmetic Mean Concentration (ppm)		0.020	0.036	0.018
PM ₁₀				
Maximum 24-Hour Concentration (µg/m ³)		68	96	94
Number of Samples		58	55	61
Number of Samples Exceeding State Standard	>50 µg/m ³	13	13	15
Number of Samples Exceeding Federal Standard	>150 µg/m ³	0	0	0
PM _{2.5}				
Maximum 24-Hour Concentration (µg/m ³)		78.9	47.3	30.5
Annual Arithmetic Mean (µg/m ³)		13.2	10.7	12.0
Number of Samples Exceeding Federal 24-Hour Standard	>35 µg/m ³	1	2	0

Source: Appendix A.

Notes: O₃ = ozone; ppm = parts per million; CO = carbon monoxide; NO₂ = nitrogen dioxide; PM₁₀ = particulate matter less than or equal to 10 microns in diameter; PM_{2.5} = particulate matter less than or equal to 2.5 microns in diameter; µg/m³ = micrograms per cubic meter; — = data not available from the South Coast Air Quality Management District (SCAQMD) or California Air Resources Board (CARB).

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

Less-than-Significant Impact. The project site is located within the SCAB, which is characterized by relatively poor air quality. The SCAQMD has jurisdiction over an approximately 10,743-square-mile area consisting of the four-county SCAB, which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. In these areas, the SCAQMD is principally responsible for air pollution control, and works directly with the SCAG, county transportation commissions, and local governments, as well as state and federal agencies, to reduce emissions from stationary, mobile, and indirect sources to meet state and federal ambient air quality standards.

Currently, these state and federal ambient air quality standards are exceeded in most parts of SCAB. In response, the SCAQMD has adopted a series of Air Quality Management Plans (AQMPs) to meet the state and federal ambient air quality standards. The AQMPs are updated regularly to more effectively reduce emissions, accommodate growth, and minimize any negative fiscal impacts of air pollution control on the economy.

In March 2017, the SCAQMD released the Final 2016 AQMP (SCAQMD 2017a). The 2016 AQMP continues to evaluate current integrated strategies and control measures to meet the NAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include using incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels. Similar to the 2012 AQMP, the 2016 AQMP incorporates scientific and technological information and planning assumptions, including the 2016 RTP/Sustainable Communities Strategy and updated emission inventory methodologies for various source categories. The project's consistency with the AQMP would be determined using the 2016 AQMP, discussed as follows.

The SCAQMD CEQA Handbook identifies two key indicators of consistency (SCAQMD 1993):

1. Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP
2. Whether the project will exceed the assumptions in the AQMP or increments based on the year of project build out and phase

Criterion 1: Increase in the Frequency or Severity of Violations?

Construction Impacts

The violations that Consistency Criterion No. 1 refers to are the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if localized significance thresholds (LSTs) or regional significance thresholds were exceeded. The proposed project would exceed the applicable LSTs or regional significance thresholds for construction activity (see Section 3.3(b) for further details on construction emissions associated with the proposed project). Therefore, the proposed project would have the potential to conflict with the AQMP according to this criterion.

Operational Impacts

The proposed project would not exceed any of the applicable LSTs (see Section 3.3(b) for further details on operational emissions associated with the proposed project). Therefore, the proposed project would not have the potential to conflict with the AQMP according to this criterion.

On the basis of the preceding discussion, the proposed project would be inconsistent with the first criterion.

Criterion 2: Exceedance of the assumptions in the AQMP?

The proposed project would exceed the assumptions in the AQMP based on the years of proposed project build-out phase (SCAQMD 1993).

Overview

The 2016 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the district are provided to the SCAG, which develops regional growth forecasts, and are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in City of Rialto General Plan is considered to be consistent with the AQMP.

Construction Impacts

Peak day emissions generated by construction activities are largely independent of land use assignments, but rather are a function of development scope and maximum area of disturbance. Irrespective of the project site's land use designation, development of the site to its maximum potential for area of disturbance would likely occur. As such, it is

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expected disturbance of the entire approximately 9-acre site would occur during construction activities; however, the maximum acreage of disturbance would be the proposed project's building square footage, which is approximately 188,712 square feet, or 4.33 acres. Therefore, the proposed project construction is consistent with the assumptions of the AQMP.

Operational Impacts

The proposed project is located within the Renaissance Specific Plan. As per the Specific Plan, the land use designation for the project site is "Employment (EMP)." This land use designation accommodates a mixture of professional office, light industrial, research and development, business park, light manufacturing, assembly, and related storage and support services uses. The proposed project consists of the development of up to 188,712 square feet of industrial/warehouse use on an approximately 9-acre site. The project land uses are generally consistent with the land uses allowed under the City land use designations for the project site. Further, no changes are proposed to these existing designations. As such, the proposed project would be consistent with the growth projections.

AQMP Consistency Conclusion

The proposed project would not result in or cause NAAQS or CAAQS violations. The project's proposed land use designation for the project site is permitted/conditionally permitted in the adopted City General Plan. Therefore, the proposed project is consistent with the AQMP.

- b) ***Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?***

Less-than-Significant Impact With Mitigation Incorporated. An air quality modeling analysis was conducted to calculate the potential air quality emissions associated with the construction and operation of the proposed project compared to SCAQMD standards (Appendix A).

Standards of Significance

The SCAQMD has developed regional and LSTs based on the volume of pollution emitted rather than on actual ambient air quality because the direct air quality impact of a particular project is not quantifiable on a regional scale. The SCAQMD CEQA Handbook states that any project in SCAB with daily emissions that exceed any of the identified significance thresholds should be considered as having an individually and cumulatively significant air quality impact (SCAQMD 2015). It should be noted that the

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SCAQMD provides a threshold for emissions of lead; however, for purposes of this analysis, no lead emissions are calculated, as there are no substantive sources of lead emissions. Additionally, the air quality modeling program (discussed below) does not calculate any emissions of lead from typical construction or operational activities.

A regional air quality impact would be considered significant if emissions exceed the SCAQMD significance thresholds shown in Table 4.

Table 4
Maximum Daily Emissions Thresholds

Regional Thresholds		
Pollutant	Construction (lbs/day)	Operations (lbs/day)
NO _x	100	55
VOC	75	55
PM ₁₀	150	150
PM _{2.5}	55	55
SO _x	150	150
CO	550	550
Pb	3	3
Localized Thresholds		
Pollutant	Construction (lbs/day)	Operations (lbs/day)
NO _x	118 (demolition)	342
	287 (site preparation)	
	251 (grading)	
CO	1,626 (demolition)	3,311
	2,721 (site preparation)	
	2,328 (grading)	
PM ₁₀	23 (demolition)	14
	44 (site preparation)	
	36 (grading)	
PM _{2.5}	7 (demolition)	1
	11 (site preparation)	
	10 (grading)	

Source: SCAQMD 2015.

Notes: lbs/day = pounds per day; NO_x = oxides of nitrogen; VOC = volatile organic compound; PM₁₀ = particulate matter less than or equal to 10 microns in diameter; PM_{2.5} = particulate matter less than or equal to 2.5 microns in diameter; SO_x = sulfur oxides; CO = carbon monoxide; Pb = lead.

California Emissions Estimator Model Employed to Estimate Air Quality Emissions

On October 17, 2017, the SCAQMD, in conjunction with the California Air Pollution Control Officers Association and other California air districts, released the latest version of the California Emissions Estimator Model (CalEEMod), version 2016.3.2. The purpose of this model is to calculate construction-source and operational-source criteria

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pollutant (oxides of nitrogen (NO_x), volatile organic compound (VOC), PM₁₀, PM_{2.5}, sulfur oxides (SO_x), and CO) and GHG emissions from direct and indirect sources and quantify applicable air quality and GHG reductions achieved from mitigation measures (CAPCOA 2016). Accordingly, the latest version of CalEEMod has been used for this proposed project to determine construction and operational air quality emissions. Output from the model runs for both construction and operational activity are provided in the Air Quality Impact Analysis (Appendix A).

Construction Emissions

Construction activities associated with the proposed project would result in emissions of CO, VOCs, NO_x, SO_x, PM₁₀, and PM_{2.5}. Construction-related emissions are expected from the following construction activities:

- Demolition
- Site preparation
- Grading
- Building construction
- Paving
- Architectural coating

Construction is expected to commence in January 2019 and will last through May 2020. The construction schedule used in the analysis, shown in Table 1, represents a “worst-case” analysis scenario. Should construction occur any time after the respective dates, it is anticipated construction emissions would be lower than the analysis conducted herein, since emission factors for construction decrease as time passes and as the analysis year increases emission regulations become more stringent.¹ The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA Guidelines. The site-specific construction fleet may vary due to specific project needs at the time of construction. The duration of construction activity was based on a 2020 opening year. A detailed summary of construction equipment, shown in Table 5, was based on CalEEMod defaults. Please refer to specific detailed modeling inputs/outputs contained in Appendix A.

¹ As shown in the CalEEMod User’s Guide, Version 2016.3.2 (ENVIRON 2016), Section 4.3, OFFROAD Equipment Emission Factors, as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer, less-polluting equipment and new regulatory requirements.

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Dust is typically a major concern during rough grading activities. Because such emissions are not amenable to collection and discharge through a controlled source, they are called “fugitive emissions.” Fugitive dust emission rates vary as a function of many parameters (soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). CalEEMod was used to calculate fugitive dust emissions resulting from this phase of activity. It is anticipated the project site will require demolition of 2,000 square feet of existing structures. Additionally, according to information provided by the applicant, the project site is expected to require 11,300 cubic yards of soil import.

Construction emissions for construction worker vehicles traveling to and from the project site, as well as vendor trips (construction materials delivered to the project site), were estimated based on information from the applicant and CalEEMod.

Table 5
Construction Equipment Assumptions

Activity	Equipment	Number	Hours Per Day
Demolition	Concrete/industrial saws	1	8
	Excavators	3	8
	Rubber-tired dozers	2	8
Site preparation	Crawler tractors	4	8
	Rubber-tired dozers	3	8
Grading	Crawl tractors	3	8
	Excavators	1	8
	Graders	1	8
	Rubber-tired dozers	1	8
Building construction	Cranes	1	8
	Crawler Tractors	3	8
	Forklifts	3	8
	Generator Sets	1	8
	Welders	1	8
Paving	Pavers	2	8
	Paving equipment	2	8
	Rollers	2	8
Architectural coating	Air compressors	1	8

Source: Appendix A.

Construction Emissions Summary

The SCAQMD rules that are currently applicable during construction activities for the proposed project include Rule 1113 (Architectural Coatings), Rule 431.2 (Low Sulfur

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Fuel), Rule 403 (Fugitive Dust), and Rule 1186/1186.1 (Street Sweepers). The SCAQMD rules include best available control measures to reduce construction-source air pollutant emissions. It should be noted that these best available control measures are not mitigation as they are standard regulatory requirements. As such, Table 6 has taken credit for Rule 1113 and Rule 403.

The estimated maximum daily construction emissions without mitigation are summarized in Table 6. Under the assumed scenarios, emissions resulting from proposed project construction would not exceed criteria pollutant thresholds established by the SCAQMD for emissions of VOCs, and no mitigation is required.

Table 6
Maximum Daily Peak Construction Emissions Summary

Year	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2019	5.94	68.19	25.01	0.10	11.04	6.75
2020	18.17	41.75	23.89	0.07	3.23	1.98
Maximum Daily Emissions	18.17	68.19	25.01	0.10	11.04	6.75
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Source: Appendix A.

Notes: VOC = volatile organic compound; NO_x = nitrogen oxides; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = particulate matter less than or equal to 10 microns in diameter; PM_{2.5} = particulate matter less than or equal to 2.5 microns in diameter; SCAQMD = South Coast Air Quality Management District.

Operational Emissions

Operational activities associated with the proposed project would result in emissions of VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5}. Operational emissions would be expected from the following primary sources:

- Area source emissions
- Energy source emissions
- Mobile source emissions

Area Source Emissions

Architectural Coatings

Over time, the buildings that are part of the proposed project would be subject to emissions resulting from the evaporation of solvents contained in paints, varnishes,

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primers, and other surface coatings as part of proposed project maintenance. The emissions associated with architectural coatings were calculated using CalEEMod.

Consumer Products

Consumer products include, but are not limited to, detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds, which, when released in the atmosphere, can react to form O₃ and other photochemically reactive pollutants. The emissions associated with use of consumer products were calculated based on defaults provided in CalEEMod.

Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the project. The emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod.

Energy Source Emissions

Combustion Emissions Associated with Natural Gas and Electricity

Electricity and natural gas are used by almost every project. Criteria pollutant emissions are emitted through the generation of electricity and consumption of natural gas. However, because electrical generating facilities for the project site are located outside the region (state) or offset through the use of pollution credits (RECLAIM) for generation within SCAB, criteria pollutant emissions from off-site generation of electricity are generally excluded from the evaluation of significance, and only natural gas use is considered. The emissions associated with natural gas use were calculated using CalEEMod.

Mobile Source Emissions

Vehicles

Project-related operational air quality impacts derive predominantly from mobile sources. In this regard, approximately 90% (by weight) of all project operational-source emissions would be generated by mobile sources (vehicles). The project-related operational air quality impacts derive primarily from vehicle trips generated by the project. Trip characteristics available from the Traffic Impact Analysis (TIA) prepared for the proposed project, and included as Appendix H, was utilized in this analysis.

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Per the TIA (Appendix H), the proposed project is expected to generate a net total of approximately 671 trip-ends per day (actual vehicles). The net project trip generation includes 268 truck trip-ends per day from the proposed buildings within the project site, including 1.97% 2-axle trucks, 28.02% 3-axle trucks, and 70.01% 4+-axle trucks.

Trip Length

A technical deficiency inherent in calculating the projected vehicle emissions associated with any project is the estimation of trip length and vehicle miles traveled (VMT). VMT for a given project is calculated by the total number of vehicle trips to/from the project times average trip length. This method of estimating VMT for use in calculating vehicle emissions likely results in the overestimation and double-counting of emissions because, for a distribution warehouse center such as the proposed project, the land use is likely to attract (divert) existing vehicle trips that are already on the circulation system as opposed to generating new trips. In this regard, the proposed project would, to a large extent, redistribute existing mobile-source emissions rather than generate additional emissions within SCAB. Therefore, the estimation of the proposed project's vehicular-source emissions is likely overstated in that no credit for, or reduction in, emissions is assumed based on diversion of existing trips.

Provided herein is a summary of the VMT recommendations of the SCAQMD and SCAG, followed by a description of the methodology used to calculate the VMT rates used in the Air Quality Impact Analysis (Appendix A).

SCAQMD Recommendation

In the last 5 years, the SCAQMD has provided numerous comments on the trip length for warehouse/distribution and industrial land use projects. The SCAQMD asserts that the model-default trip length in CalEEMod and the URBan EMISsions 2007 model (version 9.2.4) would underestimate emissions. The SCAQMD asserts that for warehouse, distribution center, and industrial land use projects, most of the heavy-duty trucks would be hauling consumer goods, often from the Ports of Long Beach and Los Angeles and/or to destinations outside of California. The SCAQMD states that, for this reason, the CalEEMod and the URBan EMISsions model default trip length (approximately 12.6 miles) would not be representative of activities at like facilities. The SCAQMD generally recommends the use of a 40-mile one-way trip length.

Southern California Association of Government Heavy-Duty Truck Model

SCAG is composed of six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 190 cities in Southern California and is the organization

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charged with addressing and resolving short- and long-term regional policy issues. The SCAG region also consists of 14 subregional entities recognized by the Regional Council as partners in the regional policy planning process. The SCAG region has more than 19 million residents and encompasses more than 38,000 square miles, representing the largest and most diverse region in the country.

SCAG maintains a regional transportation model. In its most recent (2008) transportation validation for the regional model, SCAG indicates the average internal truck trip length for the SCAG region is 5.92 miles for light-duty trucks, 13.06 miles for medium-duty trucks, and 24.11 miles for heavy-duty trucks (SCAG 2012).

Approach for Analysis of the Project

The SCAQMD approach identified above is deemed to be the most applicable for the proposed project. This same methodology is employed in analyses for similar projects in the City and is considered by the lead agency to be appropriate and accurate.

Two separate model runs were utilized to more accurately model emissions resulting from vehicle operations. The first run analyzed passenger car emissions, which incorporated a default trip length of 16.6 miles for passenger cars within San Bernardino County and a fleet mix of 100% light-duty auto vehicles. The second run analyzed truck emissions, which incorporated an average truck trip length of 40 miles and a fleet mix of 1.97% light-duty, 28.02% medium-duty, and 70.01% heavy-duty trucks for warehousing uses. The estimated emissions resulting from vehicle operations are shown in Table 7. Detailed emission calculations are provided in the Air Quality Impact Analysis (Appendix A).

Fugitive Dust Related to Vehicular Travel

Vehicles traveling on paved roads would be a source of fugitive emissions due to the generation of road dust inclusive of tire wear particulates. The emissions estimates for travel on paved roads were calculated using the CalEEMod model.

Operational Emissions Summary

Impacts Without Mitigation

Operational-source emissions without implementation of mitigation measures are summarized in Table 7. As indicated in Table 7, without the incorporation of mitigation, the proposed project would exceed regional thresholds for significance established by SCAQMD for NO_x.

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Table 7
Summary of Peak Operational Emissions (Without Mitigation)

Operational Activities – Summer Scenario	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area source	4.26	3.80E-04	0.04	0.00	1.5E-04	1.5E-04
Energy source	0.01	0.10	0.09	6.20E-04	7.82E-03	7.82E-03
Mobile (passenger cars)	0.63	0.90	13.02	0.04	5.11	1.37
Mobile (trucks)	2.56	84.97	16.64	0.34	10.27	3.28
Total Maximum Daily Emissions	7.46	85.98	29.78	0.28	15.38	4.66
SCAQMD regional threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	YES	NO	NO	NO	NO
Operational Activities – Winter Scenario	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area source	4.26	3.80E-04	0.04	0.00	1.50E-04	1.50E-04
Energy source	0.01	0.10	0.09	6.20E-04	7.82E-03	7.82E-03
Mobile (passenger cars)	0.51	0.94	10.47	0.04	5.11	1.37
Mobile (trucks)	2.62	86.96	17.65	0.33	10.27	3.28
Total Maximum Daily Emissions	7.40	87.96	28.25	0.37	15.39	4.66
SCAQMD regional threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	YES	NO	NO	NO	NO

Source: Appendix A

Notes: VOC = volatile organic compound; NO_x = nitrogen oxides; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = particulate matter less than or equal to 10 microns in diameter; PM_{2.5} = particulate matter less than or equal to 2.5 microns in diameter; E = (x 10[^]); SCAQMD = South Coast Air Quality Management District.

Impacts With Mitigation Measures

Operational-source emissions with the implementation of mitigation measures are summarized in Table 8 and Table 9. Either mitigation Option A or Option B are required to reduce NO_x impacts to less-than-significant levels. Upon implementation of either Option A or Option B of Mitigation Measure (MM-) AQ-1, project operational-source emissions would not exceed the applicable SCAQMD thresholds for any criteria pollutant.

Table 8
Summary of Peak Operational Emissions (With Mitigation Option A)

Operational Activities – Summer Scenario	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area source	4.26	3.80E-04	0.04	0.00	1.5E-04	1.5E-04
Energy source	0.01	0.10	0.09	6.20E-04	7.82E-03	7.82E-03
Mobile (passenger cars)	0.63	0.90	13.02	0.04	5.11	1.37

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Table 8
Summary of Peak Operational Emissions (With Mitigation Option A)

Operational Activities – Summer Scenario	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Mobile (trucks)	1.53	50.57	9.90	0.20	6.11	1.96
Total Maximum Daily Emissions	6.42	51.57	23.04	0.25	11.23	3.33
SCAQMD regional threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
Operational Activities – Winter Scenario	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area source	4.26	3.80E-04	0.04	0.00	1.50E-04	1.50E-04
Energy source	0.01	0.10	0.09	6.20E-04	7.82E-03	7.82E-03
Mobile (passenger cars)	0.51	0.94	10.47	0.04	5.11	1.37
Mobile (trucks)	1.56	52.72	10.50	0.20	6.11	1.95
Total Maximum Daily Emissions	6.34	52.77	21.10	0.24	11.23	3.33
SCAQMD regional threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Source: Appendix A

Notes: VOC = volatile organic compound; NO_x = nitrogen oxides; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = particulate matter less than or equal to 10 microns in diameter; PM_{2.5} = particulate matter less than or equal to 2.5 microns in diameter; E = (x 10[^]); SCAQMD = South Coast Air Quality Management District.

Table 9
Summary of Peak Operational Emissions (With Mitigation Option B)

Operational Activities – Summer Scenario	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area source	4.26	3.80E-04	0.04	0.00	1.5E-04	1.5E-04
Energy source	0.01	0.10	0.09	6.20E-04	7.82E-03	7.82E-03
Mobile (passenger cars)	0.63	0.90	13.02	0.04	5.11	1.37
Mobile (trucks)	2.00	52.59	12.97	0.26	8.00	2.56
Total Maximum Daily Emissions	6.89	53.59	26.11	0.31	13.12	3.94
SCAQMD regional threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
Operational Activities – Winter Scenario	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area source	4.26	3.80E-04	0.04	0.00	1.50E-04	1.50E-04
Energy source	0.01	0.10	0.09	6.20E-04	7.82E-03	7.82E-03
Mobile (passenger cars)	0.51	0.94	10.47	0.04	5.11	1.37
Mobile (trucks)	2.04	53.30	13.76	0.26	8.00	2.56
Total Maximum Daily Emissions	6.82	54.35	24.36	0.30	13.12	3.94

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Table 9
Summary of Peak Operational Emissions (With Mitigation Option B)

Operational Activities – Summer Scenario	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
SCAQMD regional threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Source: Appendix A

Notes: VOC = volatile organic compound; NO_x = nitrogen oxides; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = particulate matter less than or equal to 10 microns in diameter; PM_{2.5} = particulate matter less than or equal to 2.5 microns in diameter; E = (x 10^A); SCAQMD = South Coast Air Quality Management District.

As shown in Table 7, emissions result from the proposed project operations would exceed criteria pollutant thresholds established by the SCAQMD for emissions of NO_x without mitigation. With implementation of Option A or Option B of MM-AQ-1, as shown in Table 8 and Table 9, project operational-source emissions would not exceed the applicable SCAQMD thresholds for emissions of NO_x. Therefore, upon implementation of MM-AQ-1, impacts associated with violation of air quality standards would be less than significant.

MM-AQ-1 In order to reduce the operational impacts associated with oxides of nitrogen (NO_x) emissions, the proposed project shall implement one of the following mitigation options:

Mitigation Option A: The proposed project's tenant(s) shall limit the number of heavy-duty diesel-fueled trucks accessing the project site to 160 trucks per day if the truck fleet is wholly or partially older than the 2010 U.S. Environmental Protection Agency/California Air Resources Board truck engine standards. A truck log tracking on-site trucking activities shall be kept by the tenant and made available to the City of Rialto and/or their designee at the City's request.

or

Mitigation Option B: The proposed project's tenant(s) shall limit the number of heavy-duty diesel-fueled trucks accessing the project site to 210 trucks per day if the truck fleet is equal to or better than the 2010 U.S. Environmental Protection Agency/California Air Resources Board truck engine standards. A truck log tracking on-site trucking activities shall be kept by the tenant and made available to the City of Rialto and/or their designee at the City's request.

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Pursuant to a phase-in schedule established by U.S. EPA/CARB, all heavy- and heavier-duty diesel-fueled trucks must have a 2010 Model Year engine or newer by 2023. Thus, MM-AQ-1 shall be in effect on the project until 2023. It is recommended that Mitigation Options A and B in MM-AQ-1 be included as a condition of project approval, and that the building user keep a truck log that would be available to the City or its designee upon request to verify compliance. Upon implementation of MM-AQ-1, impacts associated with operational-source air pollutant emissions would be less than significant.

- c) ***Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?***

Less-than-Significant Impact. Related projects could contribute to an existing or projected air quality exceedance because SCAB is currently in nonattainment for O₃, PM₁₀, and PM_{2.5}. The SCAQMD published the *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution* on how to address cumulative impacts from air pollution. In this document, the SCAQMD clearly states the following (SCAQMD 2003, D-3):

The AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for toxic air contaminant (TAC) emissions. The project specific (project increment) significance threshold is HI >1.0 while the cumulative (facility-wide) is HI >3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.

Projects that exceed the project-specific significance thresholds for applicable criteria pollutants, including O₃, PM_{2.5}, PM₁₀, CO, NO₂, SO₂, and lead, are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.

Therefore, this analysis assumes that individual projects that do not generate operational or construction emissions that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would also not cause a cumulatively considerable increase in

emissions for those pollutants for which the SCAB is in nonattainment, and therefore, would not be considered to have a significant adverse air quality impact. Alternatively, individual project-related construction and operational emissions that exceed SCAQMD thresholds for project-specific impacts would be considered cumulatively considerable.

Cumulative Construction Impacts

Construction-source air pollutant emissions for the proposed project would not result in exceedances for any criteria pollutant. As a result, construction-source emissions for the proposed project would be considered less than significant on a project-specific and cumulative basis.

Cumulative Operational Impacts

Operational-source air pollutant emissions for the proposed project would not result in exceedances for any criteria pollutant. As a result, operational-source emissions for the proposed project would be considered less than significant on a project-specific and cumulative.

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

Less-than-Significant Impact. The potential impact of project-generated air pollutant emissions at sensitive receptors has also been considered. Sensitive receptors can include uses such as long-term health care facilities, rehabilitation centers, and retirement homes. Residences, schools, playgrounds, child-care centers, and athletic facilities can also be considered as sensitive receptors.

Localized Significance Thresholds

The analysis uses methodology in the SCAQMD *Final Localized Significance Threshold Methodology* (Methodology) (SCAQMD 2008). The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the federal and/or state ambient air quality standards (NAAQS/CAAQS). Collectively, these are referred to as LSTs.

The significance of localized emissions impacts depends on whether ambient levels in the vicinity of any given project are above or below state standards. In the case of CO and NO₂, if ambient levels are below the standards, a project is considered to have a significant impact if project emissions result in an exceedance of one or more of these standards. If ambient levels already exceed a state or federal standard, then project emissions are considered significant if they increase ambient concentrations by a

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measurable amount. This would apply to PM_{10} and $PM_{2.5}$, both of which are nonattainment pollutants.

The SCAQMD established LSTs in response to the SCAQMD Governing Board's Environmental Justice Initiative I-4.² LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest residence or sensitive receptor. The SCAQMD states that lead agencies can use the LSTs as another indicator of significance in its air quality impact analyses.

LSTs were developed in response to environmental justice and health concerns raised by the public regarding exposure of individuals to criteria pollutants in local communities. To address the issue of localized significance, the SCAQMD adopted LSTs that show whether a project would cause or contribute to localized air quality impacts and thereby cause or contribute to potential localized adverse health effects. The analysis makes use of methodology included in the SCAQMD methodology (SCAQMD 2008).

Applicability of LSTs for the Proposed Project

For the proposed project, the appropriate source receptor area for the LST analysis is the central San Bernardino air monitoring station (Source Receptor Area 32). LSTs apply to CO, NO₂, PM_{10} , and $PM_{2.5}$. The SCAQMD produced look-up tables for projects less than or equal to 5 acres in size.

To determine the appropriate methodology for determining localized impacts that could occur as a result of project-related construction, the following process is undertaken:

- CalEEMod is used to determine the maximum daily on-site emissions that will occur during construction activity.
- The SCAQMD's Fact Sheet for Applying CalEEMod to Localized Significance Thresholds (SCAQMD 2013) is used to determine the maximum site acreage that is actively disturbed based on the construction equipment fleet and equipment hours as estimated in CalEEMod.

² The purpose of SCAQMD's environmental justice program is to ensure that everyone has the right to equal protection from air pollution and fair access to the decision-making process that works to improve the quality of air within their communities. Further, the SCAQMD defines environmental justice as "equitable environmental policymaking and enforcement to protect the health of all residents, regardless of age, culture, ethnicity, gender, race, socioeconomic status, or geographic location, from the health effects of air pollution" (SCAQMD 2017b).

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- If the total acreage disturbed is less than or equal to 5 acres per day, then the SCAQMD's screening look-up tables are used to determine if a project has the potential to result in a significant impact. The look-up tables establish a maximum daily emissions threshold in pounds per day that can be compared to CalEEMod outputs.

Emissions Considered

SCAQMD's methodology clearly states that "off-site mobile emissions from the project should NOT be included in the emissions compared to LSTs" (SCAQMD 2003). Therefore, for the purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered.

Sensitive Receptors

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, individuals with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Structures that house these persons or places where they gather to exercise are defined as "sensitive receptors;" they are also known to be locations where an individual can remain for 24 hours.

The nearest sensitive receptors are single-family residences, one residence located to the southeast, approximately 230 feet/70.10 meters from the project site.

Construction-Source Emissions LST Analysis

Table 10 is used to determine the maximum daily disturbed acreage during site grading for modeling localized emissions. Based on Table 10, the proposed project could actively disturb approximately 1.0 acre per day during the demolition phase, 3.5 acres during the site preparation phase, and approximately 2.5 acres per day during the grading phase of construction.

Table 10
Maximum Daily Disturbed Acreage

Construction Phase	Equipment Type	Equipment Quantity	Acres Graded per 8-Hour day	Operating Hours per Day	Acres Graded Per Day
Demolition	Crawler tractors	0	0.5	8	0
	Graders	0	0.5	8	0
	Rubber-tired dozers	2	0.5	8	1
	Scrapers	0	1	8	0
Total acres graded per day during demolition					1

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Table 10
Maximum Daily Disturbed Acreage

Construction Phase	Equipment Type	Equipment Quantity	Acres Graded per 8-Hour day	Operating Hours per Day	Acres Graded Per Day
Site preparation	Crawler tractors	4	0.5	8	2
	Graders	0	0.5	8	0
	Rubber-tired dozers	3	0.5	8	1.5
	Scrapers	0	1	8	0
Total acres graded per day during site preparation					3.5
Grading	Crawler tractors	3	0.5	8	1.5
	Graders	1	0.5	8	0.5
	Rubber-tired dozers	1	0.5	8	0.5
	Scrapers	0	1	8	0
Total acres graded per day during grading					2.5

Source: Appendix A.

Since the total acreage disturbed is less than 5 acres per day for the demolition phase, site preparation phase, and grading phase, the SCAQMD's screening look-up tables were used in determining impacts. A 70.10-meter receptor distance is conservatively utilized as a screening threshold to determine the LSTs for emissions of CO, NO₂, PM₁₀, and PM_{2.5}.

Table 11 identified the localized impacts at the nearest receptor location in the vicinity of the proposed project. As shown, emissions during construction activity would not exceed SCAQMD's LSTs for any criteria pollutant, and no mitigation is required.

Table 11
Localized Significance Summary Construction

On-Site Demolition Emissions	Emissions (pounds per day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	35.78	22.06	1.83	1.68
SCAQMD Localized Threshold	181	1,626	23	7
Threshold Exceeded?	NO	NO	NO	NO
On-Site Site Preparation Emissions	Emissions (pounds per day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	68.11	23.14	10.84	6.69
SCAQMD Localized Threshold	287	2,721	44	11
Threshold Exceeded?	NO	NO	NO	NO

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Table 11
Localized Significance Summary Construction

On-Site Grading Emissions	Emissions (pounds per day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	45.25	17.10	5.03	3.07
SCAQMD Localized Threshold	251	2,328	36	10
Threshold Exceeded?	NO	NO	NO	NO

Source: Appendix A.

Notes: NO_x = nitrogen oxides; CO = carbon monoxide; PM₁₀ = particulate matter less than or equal to 10 microns in diameter; PM_{2.5} = particulate matter less than or equal to 2.5 microns in diameter; SCAQMD = South Coast Air Quality Management District.

Localized Significance – Long-Term Operational Activity

Generally, the maximum acreage would be the proposed project's building square footage, which is approximately 188,712 square feet, or 4.33 acres. However, for the purposes of this analysis, and as a conservative measure, the SCAQMD look-up tables of 5 acres were used to determine LSTs for operational activity.

Table 12 shows the calculated emissions for the proposed project's operational activities compared with the applicable LSTs. The LST analysis includes on-site sources only; however, CalEEMod outputs do not separate on-site and off-site emissions from mobile sources. In an effort to establish a maximum potential impact scenario for analytic purposes, the emissions shown in Table 12 represent all on-site project-related stationary (area) sources and 5% of the project-related mobile sources. Considering that the weighted trip length used in CalEEMod for the proposed project is approximately 40 miles, 5% of this total would represent an on-site travel distance for each car and truck of approximately 2 miles or 10,560 feet; thus, the 5% assumption is conservative and would tend to overstate the actual impact. Modeling based on these assumptions demonstrates that even within broad encompassing parameters, operational-source emissions for the proposed project would not exceed applicable LSTs.

As previously noted, a 70.10-meter receptor distance is utilized to determine the LSTs for emissions of NO_x, CO, PM₁₀, and PM_{2.5}.

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Table 12
Localized Significance Summary Operations

Operational Activity	Emissions (pounds per day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	4.40	1.61	0.78	0.24
SCAQMD Localized Threshold	333	3,098	13	2
Threshold Exceeded?	NO	NO	NO	NO

Source: Appendix A

Notes: NO_x = nitrogen oxides; CO = carbon monoxide; PM₁₀ = particulate matter less than or equal to 10 microns in diameter; PM_{2.5} = particulate matter less than or equal to 2.5 microns in diameter; E = (x 10⁴); SCAQMD = South Coast Air Quality Management District.

As shown in Table 12, operational emissions would not exceed the applicable SCAQMD LST thresholds for any criteria pollutant. Therefore, a less-than-significant impact would occur.

CO “Hotspot” Analysis

The proposed project would not result in potentially adverse CO concentrations or “hotspots.” A hotspot would occur if an exceedance of the state 1-hour standard of 20 parts per million (ppm) or the 8-hour standard of 9 ppm were to occur. At the time of the 1993 Handbook, SCAB was designated nonattainment under the CAAQS and NAAQS for CO.

It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in SCAB is now designated as attainment. Also, CO concentrations in the project vicinity have steadily declined.

To establish a more accurate record of baseline CO concentrations affecting SCAB, a CO hotspot analysis was conducted in 2003 for four busy intersections in Los Angeles at the peak morning and afternoon times. This hotspot analysis did not predict any violation of CO standards, as shown in Table 13.

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Table 13
Carbon Monoxide Model Results

Intersection Location	Carbon Monoxide Concentrations (ppm)		
	Morning 1-Hour	Afternoon 1-Hour	8-Hour
Wilshire–Veteran	4.6	3.5	4.2
Sunset–Highland	4	4.5	3.9
La Cienega–Century	3.7	3.1	5.8
Long Beach–Imperial	3	3.1	9.3

Source: Appendix A.

Notes: ppm = parts per million.

Based on the SCAQMD's 2003 AQMP (SCAQMD 2003) and the 1992 Federal Attainment Plan for Carbon Monoxide (SCAQMD 1992), peak CO concentrations in SCAB were a result of unusual meteorological and topographical conditions and not a result of traffic volumes and congestion at a particular intersection. As evidence of this, for example, 8.4 ppm 8-hour CO concentration was measured at the Long Beach Boulevard and Imperial Highway intersection (highest CO-generating intersection within the hotspot analysis), and only 0.7 ppm was attributable to the traffic volumes and congestion at this intersection. The remaining 7.7 ppm of the 8.4-ppm 8-hour CO concentration was a result of the unusual ambient air measurements taken at the time the 2003 AQMP was prepared. Therefore, even if the traffic volumes for the proposed project were double or triple of the traffic volumes generated at the Long Beach Boulevard and Imperial Highway intersection, coupled with the ongoing improvements in ambient air quality, the proposed project would not be capable of resulting in a CO hotspot at any study area intersections.

Similar considerations are also employed by other air districts when evaluating potential CO concentration impacts. More specifically, the Bay Area Air Quality Management District concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a significant CO impact.

Traffic volumes generating the CO concentrations for the hotspot analysis are shown in Table 14. The busiest intersection evaluated was at Wilshire Boulevard and Veteran Avenue, which has a daily traffic volume of approximately 100,000 vehicles per day. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm; this indicates that, should the daily traffic volume increase four times to 400,000 vehicles per day, CO concentrations ($4.6 \text{ ppm} \times 4 = 18.4 \text{ ppm}$) would still not likely exceed the most stringent 1-

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hour CO standard (20.0 ppm).³ At buildout of the proposed project, the highest daily traffic volumes generated at the roadways within the vicinity of the project are expected to generate less than the highest daily traffic volumes generated at the busiest intersection in the CO hotspot analysis. As such, the proposed project would not likely exceed the most stringent 1-hour CO standard. At buildout of the proposed project, the highest average daily trips (ADT) on a segment of road would be 51,504 daily trips on south Alder Avenue and I-210 eastbound ramps, which is lower than the highest daily traffic volumes generated at the busiest intersection in the CO hotspot analysis (Appendix H).

Table 14
Traffic Volumes for Intersections Evaluated in the 2003 Air Quality Management Plan

Intersection Location	Peak Traffic Volumes (vph)				
	Eastbound (AM/PM)	Westbound (AM/PM)	Southbound (AM/PM)	Northbound (AM/PM)	Total (AM/PM)
Wilshire–Veteran	4,954/2,069	1,830/3,317	721/1,400	560/933	8,062/7,719
Sunset–Highland	1,417/1,764	1,342/1,540	2,304/1,832	1,551/2,238	6,614/5,374
La Cienega–Century	2,540/2,243	1,890/2,728	1,384/2,029	821/1,674	6,634/8,674
Long Beach–Imperial	1,217/2,020	1,760/1,400	479/944	756/1,150	4,212/5,514

Source: Appendix A.

Notes: vph = vehicles per hour.

At buildout of the proposed project, the highest daily traffic volumes generated at the roadways within the vicinity of the project are expected to generate less than the highest daily traffic volumes generated at the busiest intersection in the CO hotspot analysis. As such, the proposed project would not likely exceed the most stringent 1-hour CO standard. At buildout of the proposed project, the highest ADT on a segment of road would be 51,504 daily trips on south Alder Avenue and I-210 eastbound ramps, which is lower than the highest daily traffic volumes generated at the busiest intersection in the CO hotspot analysis (Appendix H).

The proposed project considered herein would not produce the volume of traffic required to generate a CO hotspot either in the context of the 2003 Los Angeles hot spot study, or based on representative Bay Area AQMD CO threshold considerations, as shown in Table 15. As such, CO hotspots are not an environmental impact of concern for the proposed project. Therefore, localized air quality impacts related to mobile-source emissions would be less than significant.

³ Based on the ratio of the CO standard (20.0 ppm) and the modeled value (4.6 ppm).

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Table 15
Project Peak Hour Traffic Volumes

Intersection Location	Peak Traffic Volumes (vph)				
	Northbound (AM/PM)	Southbound (AM/PM)	Eastbound (AM/PM)	Westbound (AM/PM)	Total (AM/PM)
Alder Av./I-210 Eastbound Ramps	1,620/1,700	2,178/1,787	722/1,293	0/0	4,520/4,780
Alder Av./Renaissance Pkwy.	1,622/2,139	1,849/1,432	1,065/1,808	375/391	4,911/5,770
Alder Av./Baseline Rd.	1,169/1,188	843/1,168	1,267/1,224	902/751	4,181/4,331
Ayala Dr. Cedar Av./Baseline Rd.	1,031/1,202	1,237/1,416	677/1,086	1,190/1,160	4,135/4,864

Source: Appendix A.

Notes: vph = vehicles per hour.

Health Risk Assessment

The health risk assessment prepared for the proposed project (Appendix A) evaluated the potential mobile source health risk impacts to sensitive receptors (residents and schools) and adjacent workers associated with the development of the proposed project. Specifically, the report analyzed health risk impacts as a result of exposure to toxic air contaminants and diesel particulate matter (DPM) as a result of heavy-duty diesel trucks accessing the site. The results of the health risk assessment of lifetime cancer risk from project-generated DPM emissions are provided in Table 16.

Sensitive Receptor Exposure Scenario

The residential land use with the greatest potential exposure to proposed project DPM source emissions is located approximately 230 feet east of the project site. At the maximally exposed individual receptor, the maximum incremental cancer risk attributable to proposed project DPM source emissions is estimated at 0.50 in one million, which is less than the threshold of 10 in one million. At this same location, non-cancer risks were estimated to be 0.00006, which would not exceed the applicable threshold of 1.0. As such, the proposed project would not cause a significant human health or cancer risk to adjacent residences.

There are no schools located within 0.25 miles of the project site. As such, there would be no significant impacts that would occur to any schools in the vicinity of the proposed project.

Worker Exposure Scenario

The worker receptor land use with the greatest potential exposure to proposed project DPM source emissions is an existing industrial use located immediately adjacent to the west of the project site. At the maximally exposed individual worker, the maximum

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incremental cancer risk impact at this location is 0.27 in one million, which is less than the threshold of 10 in one million. Maximum noncancer risks at this same location were estimated to be 0.0008, which would not exceed the applicable threshold of 1.0. As such, the proposed project would not cause a significant human health or cancer risk to adjacent workers.

Table 16
Summary of Cancer and Non-Cancer Risks

Cancer Risks				
Time Period	Location	Maximum Lifetime Cancer Risk (Risk per Million)	Significance Threshold (Risk per Million)	Exceed Significance Threshold
30-year exposure	Maximum exposed sensitive receptor	0.80	10	NO
25-year exposure	Maximum exposed worker receptor	0.27	10	NO
Non-Cancer Risks				
Time Period	Location	Maximum Hazard Index	Significance Threshold	Exceed Significance Threshold
30-year exposure	Maximum exposed sensitive receptor	0.0006	1.0	NO
25-year exposure	Maximum exposed worker receptor	0.0008	1.0	NO

Source: Appendix A.

Summary

Results of the LST analysis indicate that the proposed project would not exceed the SCAQMD LSTs during construction. Thus, sensitive receptors would not be exposed to substantial pollutant concentrations during project construction.

Results of the LST analysis indicate that the proposed project would not exceed the SCAQMD LSTs during operational activity. Additionally, proposed project traffic would not create or result in a CO hotspot. Further, the operations associated with the proposed project would not result in significant human health or cancer risk to adjacent residences, workers, or schoolchildren. As such, sensitive receptors would not be exposed to substantial pollutant concentrations as the result of project operations. Therefore, impacts associated with potential impacts to sensitive receptors would be less than significant.

e) ***Would the project create objectionable odors affecting a substantial number of people?***

Construction-Source Emissions

Less-than-Significant Impact. Established requirements addressing construction equipment operations, and construction material use, storage, and disposal

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requirements act to minimize odor impacts that may result from construction activities. Moreover, construction-source odor emissions would be temporary, short-term, and intermittent in nature and would not result in persistent impacts that would affect substantial numbers of people. Potential construction-source odor impacts are considered less than significant.

Operational-Source Emissions

Less-than-Significant Impact. Substantial odor-generating sources include land uses such as agricultural activities, feedlots, wastewater treatment facilities, landfills, or various heavy industrial uses. The proposed project does not propose any such uses or activities that would result in potentially significant operational-source odor impacts. Potential sources of operational odors generated by the proposed project would include disposal of miscellaneous commercial refuse. Consistent with City requirements, all project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with solid waste regulations, thereby precluding substantial generation of odors due to temporary holding of refuse on site. Moreover, SCAQMD Rule 402 acts to prevent occurrences of odor nuisances (SCAQMD 2018). Therefore, potential operational-source odor impacts are considered less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.4 Biological Resources

The following analysis is based on the Supplemental Biological Resources Assessment prepared by Dudek in December 2017, and included as Appendix B.

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

Less-than-Significant Impact With Mitigation Incorporated. The proposed project study area includes the construction footprint of the proposed industrial/warehouse building on the approximately 9-acre project site, plus a 100-foot buffer around the entire site. Due to the condition of the study area, the potential for rare and special-status species is low.

Based on the results of the literature review, data collection, and field observations, Dudek identified and confirmed the findings of the *Biological Resources Assessment* (see Appendix B). The study area is characterized by several disturbed or non-natural land covers, including disturbed California buckwheat scrub on in-fill slope, non-native grasses on in-fill, residence with ornamental trees, and fields with non-native mustard. These vegetation communities and land covers are described and illustrated on Figure 4 in *Biological Resources Assessment* (included in Appendix B).

Vegetation included several non-native and ornamental (planted) species, including Box Springs goldenbush (*Ericameria palmeri* var. *pachylepis*), California buckwheat (*Eriogonum fasciculatum*), cheeseweed mallow (*Malva parviflora*), Chinese elm (*Ulmus parvifolia*), common Mediterranean grass (*Schismus barbatus*), desert thorn-apple

(*Datura discolor*), eucalyptus (*Eucalyptus* sp.), foxtail barley (*Hordeum jubatum*), foxtail chess (*Bromus madritensis*), holly leaf cherry (*Prunus ilicifolia*), Indian hedgemustard (*Sisymbrium orientale*), oleander (*Nerium oleander*), mulefat (*Baccharis salicifolia*), ripgut brome (*Bromus diandrus*), Sahara mustard (*Brassica tournefortii*), shortpod mustard (*Hirschfeldia incana*), and stork's bill (*Erodium botrys*).

A limited number of wildlife species were observed or detected during the general field survey of the study area, including a total of five bird species, two reptile species, and four mammal species. Bird species detected within the study area included American crow (*Corvus brachyrhynchos*), American kestrel (*Falco sparverius*), house finch (*Haemorhous mexicanus*), house sparrow (*Passer domesticus*), and western meadowlark (*Sturnella neglecta*). No active bird nests were detected within the study area. Reptile species detected included the common side-blotched lizard (*Uta stansburiana*) and western fence lizard (*Sceloporus occidentalis*). Mammal species detected included Botta's pocket gopher (*Thomomys bottae*), desert cottontail (*Sylvilagus audubonii*), California ground squirrel (*Spermophilus beecheyi*), and coyote (*Canis latrans*).

Special-Status Plants

There are no special-status plant species that occur or have at least a moderate potential to occur within the study area. Therefore, there would be no significant direct or indirect impacts to special-status plant species.

Special-Status Wildlife

One special-status wildlife species has at least a moderate potential to occur within the study area, the burrowing owl (*Athene cunicularia*). Although loss of individuals or the habitat of this species would not threaten its regional population as a result of the proposed project, the impact would be potentially significant. Other species of birds have the potential to nest on the project site. Direct impacts to migratory nesting birds must be avoided to comply with the Migratory Bird Treaty Act and California Fish and Game Code. Indirect impacts to nesting birds from short-term, construction-related noise could result in decreased reproductive success or abandonment of an area as nesting habitat if construction were conducted during the breeding/nesting season (i.e., February through August). Implementation of MM-BIO-1, MM-BIO-2, and MM-BIO-3 would reduce potential direct and indirect impacts to burrowing owl and other nesting birds to a less-than-significant level.

MM-BIO-1 A qualified biological monitor shall be present to monitor the initial vegetation clearing of the proposed project to ensure that all practicable measures are being employed to avoid incidental disturbance of habitat

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and species of concern outside of the project limits. The biological monitor shall be authorized to halt work as required to avoid impacts to protected species. The biological monitor shall contact the construction foreman and the project manager to discuss the implementation of the minimization and mitigation measures.

MM-BIO-2 To determine if burrowing owls are occupying the project limits or adjacent areas prior to construction, a take avoidance survey following the 2012 California Department of Fish and Wildlife protocol shall be conducted no less than 14 days prior to initiating ground-disturbance activities during any time of year. In addition, any time lapses between project activities shall trigger subsequent take avoidance surveys including, but not limited to, a final survey conducted within 24 hours prior to ground disturbance. The survey shall be conducted from civil twilight to 10:00 a.m. or 2 hours before sunset until evening civil twilight within areas providing suitable habitat for burrowing owl. If burrowing owls are present, MM-BIO-3 from the Renaissance Specific Plan (City of Rialto 2010b) shall be implemented.

MM-BIO-3 Within 30 days prior to the commencement of construction, a qualified biologist shall perform a raptor (if January 15 to August 31) and grassland bird nesting survey (if between March 1 to August 31) that shall consist of a single visit to ascertain whether there are active raptor nests within 300 feet of the project footprint. Nests shall be mapped (without Global Positioning System equipment because close encroachment may cause nest abandonment). If active nests are found, construction shall not occur within appropriate buffer of the nest until the nesting attempt has been completed and/or abandoned due to non-project-related reasons.

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

No Impact. The project site is located entirely on disturbed or non-natural land covers. No sensitive or special-status vegetation communities are present within the impact footprint. Therefore, no impacts associated with riparian or sensitive vegetation communities would occur.

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- c) *Would the project 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?*

No Impact. No federally defined waters of the United States or waters of the state occur within the study area. This includes the absence of federally defined wetlands and other waters (e.g., drainages), and state-defined waters (e.g., streams and riparian extent). Therefore, no impacts associated with jurisdictional waters or wetlands would occur.

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

No Impact. The project site is located on a largely vacant property surrounded by industrial development. Due to the matrix of development surrounding the project site, the proposed project would not constrain natural wildlife movement in its vicinity. Therefore, no impacts associated with wildlife movement would occur.

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

No Impact. Chapter 11.08 of the City's Municipal Code contains tree preservation ordinances that are applicable to public and street trees planted on public property and/or the public right-of-way. These tree preservation requirements do not apply to trees located on private property. While a few mature trees are located on the project site in the vicinity of the existing on-site residence, there are no public/street trees located along the periphery of the project site. As such, the project would not adversely affect any tree subject to the City's tree preservation requirements. Therefore, no impacts associated with local policies or ordinances protecting biological resources would occur.

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

No Impact. The proposed project is not within any habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impacts associated with conservation plans would occur.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.5 Cultural Resources

The following analysis is based, in part, on the Cultural Resources Inventory prepared by Dudek in January 2018, as well as the Historical Evaluation prepared by LSA Associates in March 2016, both of which are included as Appendix C.

- a) ***Would the project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?***

Less-than-Significant Impact. The existing on-site single-family residence was evaluated for potential historical significance under CEQA as part of the Historical Evaluation conducted in March 2016 (Appendix C). This assessment was conducted using the California Department of Parks and Recreation 523 forms.

As defined by the CEQA Guidelines (14 CCR 15000 et seq.), a “historical resource” is considered to be a resource that is listed in or eligible for listing in the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR), has been identified as significant in a historical resource survey, or is listed on a local register of historical resources.

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

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

Under CEQA, a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (PRC Section 21084.1; 14 CCR 15064.5(b)). If a site is listed or eligible for listing in the CRHR, or included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of PRC Section 5024.1(q)), it is a “historical resource” and is presumed to be historically or culturally significant for the purposes of CEQA (PRC Section 21084.1; 14 CCR 15064.5(a)).

For a building to be considered historic, it typically must be at least 50 years old so sufficient time has passed to determine whether the events or characteristics of the building will have a contribution to history.

In compliance with CEQA, the single-family residence on the project site was evaluated under the four CRHR criteria outlined above, as well as local landmark criteria. As detailed in the Historic Evaluation, the existing on-site residence does not meet the criteria for listing in the CRHR and does not qualify as a historical resource under CEQA. Therefore, impacts associated with historical resources would be less than significant.

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

Less-than-Significant Impact with Mitigation Incorporated. On December 5, 2017, Dudek completed a search of the California Historical Resources Information System at the South Central Coastal Information Center (SCCIC), located on the campus of California State University, Fullerton. This search included mapped prehistoric, historical, and built-environment resources; Department of Parks and Recreation site records; technical reports; archival resources; and ethnographic references. Additional consulted sources included historical maps of the project site, the NRHP, the CRHR, the California Historic Property Data File, and the lists of California State Historical

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Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility.

The SCCIC records indicate that 11 previous technical investigations for cultural resources have been conducted within 1.0 mile of the project area between 1990 and 2016. Of these, three previous studies overlap with the project area while the remaining eight are within the records search buffer. The SCCIC records indicate that 10 resources have been recorded within 1.0 mile of the project area. Of these, one built-environment resource has been recorded within the project area while the remaining nine are within the surrounding search buffer.

In addition to the records search, Dudek archaeologists conducted an intensive pedestrian survey on December 27, 2017, using standard archaeological procedures and techniques. All field practices met the Secretary of Interior's standards and guidelines for a cultural resources inventory. Pedestrian transects were spaced at 49-foot (15-meter) intervals. Ground disturbances, such as burrows, cut banks, and drainages were also visually inspected for exposed subsurface materials and to record locational information. No artifacts were collected during the surveys.

As previously mentioned, one built-environment resource has been previously recorded within the project area at 1496 Alder Avenue (LSA-1496 Alder). Resource LSA-1496 Alder is a single-family residence built in 1948, exceeding the 45-year-old threshold to be considered a historical resource under CEQA. LSA-1496 Alder was evaluated in 2016, resulting in a recommendation as not eligible for listing in the CRHR or for designation as a City local landmark (Appendix C). Thus, it does not qualify as a historical resource pursuant to CEQA.

No additional cultural or historic built environment resources were identified during the intensive-level survey of the project area. The entire project area had very good visibility (90%–95%). Observed disturbances within the project area included push piles from the 2005 grading activities as well as modern refuse dumping.

Based on this information, and because of the disturbed nature of the project area, the archaeological sensitivity of the project site is considered to be low. However, it is always possible that intact archaeological deposits could be present at subsurface levels. For this reason, the project site should be treated as potentially sensitive for archaeological resources. Therefore, MM-CUL-1 is recommended to reduce potential impacts to unanticipated archaeological resources to less than significant.

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MM-CUL-1 If archaeological resources (sites, features, or artifacts) are exposed during construction activities for the proposed project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending on the significance of the find under the California Environmental Quality Act (CEQA) (14 California Code of Regulations Section 15064.5[f]; California Public Resources Code Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan and data recovery, may be warranted.

With the incorporation of MM-CUL-1, impacts associated with archaeological resources would be less than significant.

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

Less-than-Significant Impact with Mitigation Incorporated. The project area is within an area dominated by younger alluvium derived from the San Gabriel Mountains and the Lytle Creek drainage. These deposits are relatively deep and not known to be associated with fossil specimens. Nonetheless, the erosion of the mountains and the excessive debris flows from the creek may carry fossil remains into the general area and, therefore, there is still a slight possibility for fossils to be present. The nearest fossils have been identified in the Jurupa Valley area, near Norco and Mira Loma, suggesting the potential in Rialto is very low. Excavations that exceed the relative depth of the younger alluvium and impact the older Quaternary alluvium may yield evidence of fossil specimens and thus, should be monitored. Within the project area, the older alluvium is considered to be deeply buried. Nonetheless, as is the case with most other development projects that involve earthwork activity, there is always a possibility that subsurface construction activity could unearth a potentially significant paleontological resource. As such, implementation of MM-CUL-2 would be required to ensure that subsurface construction activity complies with the standard procedures for treatment of unanticipated discoveries of paleontological resources.

MM-CUL-2 In the event that paleontological resources (fossil remains) are exposed during construction activities for the proposed project, all construction work occurring within 50 feet of the find shall immediately stop until a Qualified Paleontologist, as defined by the Society of Vertebrate

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Paleontology's 2010 guidelines, can assess the nature and importance of the find. Depending on the significance of the find, the Qualified Paleontologist may record the find and allow work to continue, or may recommend salvage and recovery of the resource. All recommendations will be made in accordance with the Society of Vertebrate Paleontology's 2010 guidelines, and shall be subject to review and approval by the City of Rialto. Work in the area of the find may only resume upon approval of a Qualified Paleontologist.

With incorporation of MM-CUL-2, impacts associated with paleontological resources would be less than significant.

d) *Would the project disturb any human remains, including those interred outside of dedicated cemeteries?*

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

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. GEOLOGY AND SOILS – Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.6 Geology and Soils

The following analysis is based in part on the Geotechnical Investigation and Soil Infiltration Study prepared by NorCal Engineering in December 2017 and included as Appendix D.

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a) *Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:*

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

Less-than-Significant Impact. The nearest active Alquist-Priolo Fault Zone to the project site is the San Jacinto Fault, located approximately 2.75 miles east of the project site. According to the CDOC Fault Activity Map (CDOC 2010), the project site is not located in a designated earthquake fault zone. Additionally, according to the City of Rialto General Plan, although several earthquake faults exist within and in proximity to the City, no faults exist beneath the project site (City of Rialto 2010a). Therefore, impacts associated with fault rupture would be less than significant.

ii) *Strong seismic ground shaking?*

Less-than-Significant Impact. Similar to other areas located in the seismically active Southern California region, the City is susceptible to ground shaking caused by several local fault systems. Historically, Rialto has experienced moderate to strong ground shaking. The San Jacinto, San Andreas, and Cucamonga Faults have the potential of generating earthquakes of maximum magnitudes ranging from 6.7 to 8.0 (City of Rialto 2010a). However, as previously addressed in Section 3.6(a)(i), the project site is not located within an active fault zone, and the site would not be affected by ground shaking more than any other area in this seismic region. Additionally, the proposed project would be designed in accordance with all applicable provisions established in the current California Building Code, which sets forth specific engineering requirements to ensure structural integrity during a seismic event. Compliance with these requirements would reduce the potential risk to both people and structures with respect to strong seismic ground shaking. Therefore, impacts associated with strong seismic ground shaking would be less than significant.

iii) *Seismic-related ground failure, including liquefaction?*

No Impact. Liquefaction occurs when partially saturated soil loses its effective stress and enters a liquid state, which can result in the soil's inability to support structures above. Liquefaction can be induced by ground-shaking events and is

dependent on soil saturation conditions. According to the City's General Plan, in its Seismic and Geologic Hazards chapter, the nearest location with moderate liquefaction susceptibility is located approximately 3 miles east of the proposed project. The Geotechnical Report (Appendix D) states that the site is not located in an area subject to liquefaction during a seismic event. Additionally, liquefaction of soils is a concern when groundwater is within 50 feet of surface grade, while groundwater depth below the project site is in excess of 200 feet. As such, the proposed project site is located in an area identified as having low liquefaction susceptibility. Therefore, no impacts associated with liquefaction would occur.

iv) Landslides?

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

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

Short-Term Construction Impacts

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

to acceptable levels. Therefore, short-term construction impacts associated with soil erosion would be less than significant.

Long-Term Operational Impacts

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

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

Less-than-Significant Impact. As previously discussed in Section 3.6(a), the project site is not susceptible to landslide or liquefaction. Additionally, the proposed project would be designed in accordance with all applicable provisions established in the current California Building Code, which sets forth specific engineering requirements to ensure structural integrity, regardless of the specific characteristic of the underlying soils. Compliance with these requirements would reduce the potential risk to both people and structures with respect to a variety of geotechnical constraints. Therefore, impacts associated with unstable geologic units/soils would be less than significant.

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

Less-than-Significant Impact. According to the U.S. Department of Agriculture Web Soil Survey, the soil beneath the project site consists of Tujunga gravelly loamy sand, 0% to 9% slopes. This type of soil has a very low runoff class, and somewhat excessive drainage class (USDA 2017). The Soil Infiltration Study (Appendix D) states that the potential for hydro-consolidation, or soil collapse, and the susceptibility for any ground settlements, is considered low. Additionally, the Geotechnical Investigation (Appendix D) provides engineering recommendations based on the particular geological characteristics of the project site. Some of these recommendations reiterate requirements already set forth in the California Building Code, while other recommendations may exceed these requirements based on the specific geological characteristics of the project site. Compliance with these requirements, in conjunction with the low potential for subsidence, would reduce the potential risk to people

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and structures due to unstable and expansive soils. Therefore, impacts associated with expansive soils would be less than significant.

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

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.7 Greenhouse Gas Emissions

The following analysis is based on the Walnut/Alder Warehouse Project Air Quality Impact Analysis, Greenhouse Emissions Analysis, and Mobile Source Health Risk Assessment prepared by Urban Crossroads, and included as Appendix A.

- a) ***Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***

Less-than-Significant Impact. The proposed project has been evaluated to determine if it will result in significant GHG impacts. The significance of these potential impacts are described as follows.

Construction Impacts

The Air Quality Impact Analysis included within Appendix A provides additional details on specific construction-related outputs programmed in CalEEMod. For construction-phase project emissions, GHGs are quantified and amortized over the life of the proposed project. To amortize the emissions over the life of the project, the SCAQMD recommends calculating the total GHG emissions for the construction activities, dividing

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it by a 30-year project life, and then adding that number to the annual operational phase GHG emissions (SCAQMD 2008). As a result, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions.

Operational Impacts

Operational activities associated with the proposed project would result in emissions of CO₂, CH₄, and N₂O from the following primary sources:

- Building energy use (combustion emissions associated with natural gas and electricity)
- Water supply, treatment, and distribution
- Solid waste
- Mobile source emissions

Area Source Emissions

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain project landscaping. Emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod.

Energy Source Emissions

GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO₂ and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions. Unless otherwise noted, CalEEMod default parameters were used for the project analysis.

Mobile Source Emissions

Vehicles

Project-related operational air quality impacts predominantly derive from mobile sources. In this regard, approximately 92% (by weight) of all project operational source emissions would be generated by mobile sources (vehicles). The project-related GHG impacts derive primarily from vehicle trips generated by the proposed project. Trip characteristics

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available from the TIA prepared for the proposed project (Appendix H) were utilized in this analysis. The TIA determined the proposed project would generate a net total of approximately 671 trip-ends per day (actual vehicles). The net project trip generation includes 268 truck trip-ends per day from the proposed buildings within the project site, 1.97% 2-axle trucks, 28.02% 3-axle trucks, and 70.01% 4+-axle trucks.

Trip Length

A technical deficiency inherent in calculating the projected vehicle emissions associated with any project is related to the estimation of trip length and VMT. VMT for a given project is calculated by the total number of vehicle trips to/from the project times average trip length. This method of estimating VMT for use in calculating vehicle emissions likely results in the overestimation and double-counting of emissions because, for a distribution warehouse center such as the proposed project, the land use is likely to attract (divert) existing vehicle trips that are already on the circulation system as opposed to generating new trips. In this regard, the proposed project would, to a large extent, redistribute existing mobile-source emissions rather than generate additional emissions within SCAB. Therefore, the estimation of the project's vehicular-source emissions is likely overstated in that no credit for, or reduction in, emissions is assumed based on diversion of existing trips.

SCAQMD Recommendation

In the last 5 years, the SCAQMD has provided numerous comments on the trip length for warehouse/distribution and industrial land use projects. The SCAQMD asserts that the model-default trip length in CalEEMod and the URBEMIS 2007 model (version 9.2.4) would underestimate emissions. The SCAQMD asserts that for warehouse, distribution center, and industrial land use projects, most of the heavy-duty trucks would be hauling consumer goods, often from the Ports of Long Beach and Los Angeles and/or to destinations outside of California. The SCAQMD states that for this reason, CalEEMod and the URBEMIS model default trip length (approximately 12.6 miles) would not be representative of activities at like facilities. The SCAQMD generally recommends the use of a 40-mile one-way trip length.

SCAG Heavy-Duty Truck Model

SCAG is composed of six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 190 cities in Southern California and is the organization charged with addressing and resolving short- and long-term regional policy issues. The SCAG region also consists of 14 subregional entities recognized by the Regional Council

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as partners in the regional policy planning process. The SCAG region has more than 19 million residents and encompasses more than 38,000 square miles, representing the largest and most diverse region in the country.

SCAG maintains a regional transportation model. In its most recent (2008) transportation validation for the regional model, SCAG indicates the average internal truck trip length for the SCAG region is 5.92 miles for light-duty trucks, 13.06 miles for medium-duty trucks, and 24.11 miles for heavy-duty trucks (SCAG 2012).

Approach for Analysis of the Project

The SCAQMD approach identified above is deemed to be most applicable for the proposed project. This same methodology is employed in the analyses for similar projects in the City and is considered by the lead agency to be appropriate and accurate.

Two separate model runs were used to more accurately model emissions resulting from vehicle operations. The first run analyzed passenger car emissions, which incorporated a default trip length of 16.6 miles for passenger cars within San Bernardino County and a fleet mix of 100% Light-Duty-Auto vehicles. The second run analyzed truck emissions, which incorporated an average truck trip length of 40 miles and a fleet mix of 1.97% of Light-Heavy-Duty vehicles, 28.02% of Medium-Heavy-Duty vehicles, and 70.01% of Heavy-Heavy-Duty (HHD) vehicles for warehousing uses. This proportional truck mix by axle type is based on information provided in the TIA prepared for the proposed project (Appendix H).

Solid Waste

Industrial land uses result in the generation and disposal of solid waste. A large percentage of this waste is diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted is disposed of at landfills. GHG emissions from landfills are associated with the anaerobic breakdown of material. GHG emissions associated with the disposal of solid waste from the proposed project were calculated by CalEEMod using default parameters.

Water Supply, Treatment, and Distribution

Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required to convey, treat, and distribute water depends on the volume of water and the sources of the water. Unless otherwise noted, CalEEMod default parameters were used for the proposed project.

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Summary

The City does not have an adopted threshold of significance for GHG emissions. For CEQA purposes, the City has discretion to select an appropriate significance criterion, based on substantial evidence. To evaluate GHG emissions associated with the proposed project, the SCAQMD's adopted numerical threshold of 10,000 metric tons of carbon dioxide equivalent (MT CO₂e) per year for industrial stationary source emissions was selected as the significance criterion. The SCAQMD-adopted industrial threshold was selected by the City because the proposed project is analogous to an industrial use much more closely than any other land use such as commercial or residential in terms of its expected operating characteristics. The project proposes a single industrial/warehouse building, characteristic of an industrial operation. Further, analysis of the project's traffic generation in this IS/MND is based on the Institute of Transportation Engineers Trip Generation Manual for industrial and warehouse uses. Also, 10,000 MT CO₂e has been used as the significance threshold by many local government lead agencies for logistics projects throughout the SCAG region since the AQMD adopted this threshold for its own use. Further, to ensure that the threshold is conservative in its application, although the AQMD uses its adopted 10,000 MT CO₂e threshold to determine the significance of stationary source emissions for industrial projects, the 10,000 MT CO₂e threshold used in this IS/MND is applied to all sources of project-related GHG emissions whether stationary source, mobile source, area source, or other.

The proposed project would result in approximately 532.32 MT CO₂e per year of emissions from construction, energy, waste, and water usage. In addition, the proposed project has the potential to result in an additional 6,543.62 MT CO₂e per year of emissions from mobile sources if the assumption is made that all vehicle trips to and from the project site are new trips resulting from development of the proposed project. Table 17 summarizes the annual GHG emissions associated with the proposed project.

Table 17
Project Greenhouse Gas Emissions Summary (Annual)

Emission Source	Emissions (metric tons per year)			
	CO ₂	CH ₄	N ₂ O	Total CO ₂ e
Annual construction-related emissions amortized over 30 years	29.58	0.01	0.00	29.73
Area	9.85E-03	3.00E-05	0.00	0.01
Energy	171.62	6.63E-03	1.67E-03	172.28
Mobile (passenger cars)	670.12	0.01	0.00	670.46
Mobile (trucks)	5,868.05	0.20	0.00	5,873.16

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Table 17
Project Greenhouse Gas Emissions Summary (Annual)

Emission Source	Emissions (metric tons per year)			
	CO ₂	CH ₄	N ₂ O	Total CO ₂ e
Waste	36.01	2.13	0.00	89.21
Water usage	194.98	1.43	0.04	241.10
Total CO₂e (All Sources)	7,075.95			
Screening Threshold (CO₂e)	10,000			
Threshold Exceeded?	No			

Source: Appendix A.

Notes: CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; CO₂e = carbon dioxide equivalent; E = (x 10⁶).

As shown in Table 17, the proposed project has the potential to generate 7,075.95 MT CO₂e per year of emissions. As a result, the proposed project would not exceed the SCAQMD's numeric threshold of 10,000 MT CO₂e. Thus, the proposed project would not have the potential to result in a cumulatively considerable impact with respect to GHG emissions.

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

Less-than-Significant Impact. The applicable plans, policies, or regulations adopted for the purpose of reducing the missions of GHGs that are relevant to the proposed project are the CARB Scoping Plan in support of Assembly Bill (32), and Senate Bill (SB) 32. The project's consistency with AB 32 and SB 32 are discussed below.

Scoping Plan

CARB's Scoping Plan (CARB 2008) identifies strategies to reduce California's GHG emissions in support of AB 32, which requires the State of California to reduce its GHG emissions to 1990 levels by 2020. Many of the strategies identified in the Scoping Plan are not applicable at the project level, such as long-term technology improvements to reduce emissions from vehicles, but some measures are applicable and supported by the project, such as energy efficiency. Although some measures are not directly applicable, the project would not conflict with their implementation. Reduction measures are grouped into 18 action categories, as follows (CARB 2008):

- 1. California Cap-and-Trade Program Linked to Western Climate Initiative Partner Jurisdictions.** Implement a broad-based California cap-and-trade program to provide a firm limit on emissions. Link the California cap-and-trade program with other Western Climate Initiative Partner programs to create a

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regional market system to achieve greater environmental and economic benefits for California. Ensure California's program meets all applicable AB 32 requirements for market-based mechanisms.

2. **California Light-Duty Vehicle GHG Standards.** Implement adopted Pavley standards and planned second phase of the program. Align zero-emission vehicle, alternative, and renewable fuel and vehicle technology programs with long-term climate change goals.
3. **Energy Efficiency.** Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts, including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California (including both investor-owned and publicly owned utilities).
4. **Renewables Portfolio Standard.** Achieve 33% renewable energy mix statewide.
5. **Low Carbon Fuel Standard.** Develop and adopt the Low Carbon Fuel Standard.
6. **Regional Transportation-Related GHG Targets.** Develop regional GHG emissions-reduction targets for passenger vehicles.
7. **Vehicle-Efficiency Measures.** Implement light-duty vehicle efficiency measures.
8. **Goods Movement.** Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.
9. **Million Solar Roofs Program.** Install 3,000 megawatts of solar-electric capacity under California's existing solar programs.
10. **Medium- and Heavy-Duty Vehicles.** Adopt medium- and heavy-duty vehicle efficiencies. Aerodynamic efficiency measures for heavy-duty trucks pulling trailers 53 feet or longer that include improvements in trailer aerodynamics and use of rolling resistance tires were adopted in 2008 and went into effect in 2010. Future, yet to be determined improvements include hybridization of medium-duty and heavy-duty trucks.
11. **Industrial Emissions.** Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce GHG emissions and provide other pollution reduction co-benefits. Reduce GHG emissions from fugitive emissions from oil and gas extraction and gas transmission. Adopt and implement regulations to control fugitive methane emissions and reduce flaring at refineries.
12. **High-Speed Rail.** Support implementation of a high-speed rail system.

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13. **Green Building Strategy.** Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.
14. **High Global Warming Potential Gases.** Adopt measures to reduce high global warming potential gases.
15. **Recycling and Waste.** Reduce methane emissions at landfills. Increase waste diversion, composting, and other beneficial uses of organic materials, and mandate commercial recycling. Move toward zero-waste.
16. **Sustainable Forests.** Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation. The 2020 target for carbon sequestration is 5 million MT CO₂e per year.
17. **Water.** Continue efficiency programs and use cleaner energy sources to move and treat water.
18. **Agriculture.** In the near-term, encourage investment in manure digesters and at the 5-year Scoping Plan update determine if the program should be made mandatory by 2020.

Table 18 summarizes the proposed project's consistency with the Scoping Plan. As summarized, the proposed project would not conflict with any provisions of the Scoping Plan, and it supports seven of the action categories through energy efficiency, water conservation, recycling, and landscaping.

Table 18
Scoping Plan Consistency Summary

Action	Supporting Measures ¹	Consistency
Cap-and-Trade Program	--	Not applicable. These programs involve capping emissions from electricity generation, industrial facilities, and broad scoped fuels. Caps do not directly affect light industrial projects.
Light-Duty Vehicle Standards	T-1	Not applicable. This is a statewide measure establishing vehicle emissions standards.
Energy Efficiency	E-1	Consistent. The project would include a variety of building, water, and solid waste efficiencies that are consistent with 2016 CALGreen requirements.
	E-2	
	CR-1	
	CR-2	
Renewables Portfolio Standard	E-3	Not applicable. Establishes the minimum statewide renewable energy mix.
Low Carbon Fuel Standard	T-2	Not applicable. Establishes reduced carbon intensity of transportation fuels.
Regional Transportation-Related Greenhouse Gas Targets	T-3	Not applicable. This is a statewide measure and is not within the purview of this project.

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Table 18
Scoping Plan Consistency Summary

Action	Supporting Measures ¹	Consistency
Vehicle Efficiency Measures	T-4	Not applicable. Identifies measures such as minimum tire-fuel efficiency, lower friction oil, and reduction in air conditioning use.
Goods Movement	T-5	Not applicable. Identifies measures to improve goods movement efficiencies, such as advanced combustion strategies, friction reduction, waste heat recovery, and electrification of accessories. These measures are yet to be implemented and will be voluntary, and the proposed project would not interfere with their implementation.
	T-6	
Million Solar Roofs (MSR) Program	E-4	Consistent. The MSR program sets a goal for use of solar systems throughout the state. Although the project currently does not include solar energy generation, the building roof structure would be designed to support solar panels in the future.
Medium- and Heavy-Duty Vehicles	T-7	Not applicable. MD and HD trucks and trailers working from the proposed warehouses will be subject to aerodynamic and hybridization requirements as established by ARB; no feature of the project would interfere with implementation of these requirements and programs.
	T-8	
Industrial Emissions	I-1	Not applicable. These measures are applicable to large industrial facilities (greater than 500,000 MT CO ₂ e per year), and other intensive uses such as refineries.
	I-2	
	I-3	
	I-4	
	I-5	
High-Speed Rail	T-9	Not applicable. Supports increased mobility choice.
Green Building Strategy	GB-1	Consistent. The project would include a variety of building, water, and solid waste efficiencies consistent with 2016 CALGreen requirements.
High Global Warming Potential Gases	H-1	Not applicable. The proposed warehouses would not be substantial sources of high-GWP emissions, and would comply with any future changes in air conditioning, fire protection suppressant, and other requirements.
	H-2	
	H-3	
	H-4	
	H-5	
	H-6	
	H-7	
Recycling and Waste	RW-1	Consistent. The project would be required recycle a minimum of 50% from construction activities and warehouse operations per state and City requirements.
	RW-2	
	RW-3	
Sustainable Forests	F-1	Consistent. The project would increase carbon sequestration by increasing on-site trees per the project landscaping plan.

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Table 18
Scoping Plan Consistency Summary

Action	Supporting Measures ¹	Consistency
Water	W-1	Consistent. The project would include use of low-flow fixtures and efficient landscaping, per state requirements.
	W-2	
	W-3	
	W-4	
	W-5	
	W-6	
Agriculture	A-1	Not applicable. The project is not an agricultural use.

Note:

¹ These supporting measures can be found at http://www.arb.ca.gov/cc/scopingplan/2013_update/appendix_b.pdf.

Senate Bill 32

SB 32 requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The legislation builds on the AB 32 goal of 1990 levels by 2020, and provides an intermediate goal to achieving Executive Order S-3-05 targets, which sets a statewide GHG reduction target of 80% below 1990 levels by 2050 (California Legislative Information 2016).

According to research conducted by Lawrence Berkeley National Laboratory and supported by CARB, California, under its existing and proposed GHG reduction policies, is on track to meet the 2020 reduction targets under AB 32, and could achieve the 2030 goals under SB 32. The research used a new, validated model known as the California GHG Analysis of Policies Spreadsheet (CALGAPS), which simulates GHG and criteria pollutant emissions in California from 2010 to 2050 in accordance with existing and future GHG-reducing policies. The CALGAPS model showed that GHG emissions through 2020 could range from 317 to 415 MT CO₂e per year, indicating that existing state policies will likely allow California to meet its target of 2020 levels under AB 32. CALGAPS also showed that, by 2030, emissions could range from 211 to 428 MT CO₂e per year, indicating that even if all modeled policies are not implemented, reductions could be sufficient to reduce emissions 40% below the 1990 level of SB 32. CALGAPS analyzed emissions through 2050, even though it did not generally account for policies that might be put in place after 2030. Although the research indicated that the emissions would not meet the state's 80% reduction goal by 2050, various combinations of policies could allow California's cumulative emissions to remain very low through 2050 (Lawrence Berkeley National Laboratory 2015).

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Unlike the 2020 and 2030 reduction targets of AB 32 and SB 32, respectively, the 2050 target of Executive Order S-3-05 has not been codified. Accordingly, the 2050 reduction target has not been the subject of any analysis by CARB. For example, CARB has not prepared an update to the aforementioned Scoping Plan that provides guidance to local agencies as to how they may seek to contribute to the achievement of the 2050 reduction target.

In 2017, the California Supreme Court examined the need to use the Executive Order S-3-05 2050 reduction target in *Cleveland National Forest Foundation v. San Diego Association of Governments* (2017) 3 Cal.5th 497 (Cleveland National). The case arose from SANDAG's adoption of its 2050 Regional Transportation Plan, which included its Sustainable Communities Strategy, as required by SB 375. On review, the Supreme Court held that SANDAG did not violate CEQA by not considering the Executive Order S-3-05 2050 reduction target. As previously discussed, the 2050 reduction target of Executive Order S-3-05 has not been codified, unlike the 2020 and 2030 reduction targets of AB 32 and SB 32, respectively. Accordingly, the 2050 reduction target has not been subject to analysis by CARB. Further, the proposed project is much smaller in size and scope in comparison to the Regional Transportation Plan as examined in *Cleveland National*. In that case, the California Supreme Court held that SANDAG did not violate CEQA by not considering the Executive Order S-3-05 2050 reduction target. Accordingly, there is no information presently available to assess the project's consistency with regard to the 2050 target of Executive Order S-3-05.

The proposed project would not interfere with the state's implementation of Executive Order B-30-15 or SB 32 targets of reducing statewide GHG emissions to 40% below 1990 levels by 2030 because the project would not interfere with the state's implementation of GHG reduction plans described in the CARB's Scoping Plan. Therefore, impacts associated with applicable GHG plans, policies, or regulations would be less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.8 Hazards and Hazardous Materials

The following analysis is based, in part, on the Phase I Environmental Site Assessment (ESA) prepared by Citadel Environmental Services in December 2017 and included as Appendix E.

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

Short-Term Construction Impacts

Less-than-Significant Impact. A variety of hazardous substances and wastes would be transported to, stored, used, and generated on the project site during construction of the proposed project. These would include fuels for machinery and vehicles, new and used motor oils, cleaning solvents, paints, and storage containers and applicators containing such materials. Accidental spills, leaks, fires, explosions, or pressure releases involving hazardous materials represent a potential threat to human health and the environment if

not properly treated. However, these materials would be transported, used, and disposed of in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. For example, hazardous materials would not be disposed of or released onto the ground or into the underlying groundwater or any surface water during construction or operation of the project, and completely enclosed containment would be required for all refuse generated on the project site. Additionally, all construction waste, including trash, litter, garbage, solid waste, petroleum products, and any other potentially hazardous materials, would be removed to a waste facility permitted to treat, store, or dispose of such materials. Use of these materials during construction for their intended purpose would not pose a significant risk to the public or the environment.

The transport and use of hazardous materials would be required to comply with the guidelines set forth by each product's manufacturer, as well as in accordance with all applicable federal, state, and local regulations. The United States Department of Transportation, the California Department of Health Services, Caltrans, and the California Highway Patrol all have interrelated programs designed to prevent disasters during the transportation of hazardous materials. Additionally, the EPA and the Occupational Safety and Health Administration (OSHA) have interrelated programs designed to prevent the misuse of hazardous materials in the work place.

The Phase I ESA (Appendix E) was prepared to evaluate the potential for either past or current on-site contamination activities, if any, to impact future development of the project site. As part of the Phase I ESA an inspection of the project site, review of its past use and activities, observation of surrounding properties, and search of federal, state, and local regulatory databases was conducted. The Phase I determined there is no evidence of near-surface soil contamination within the site, and no further recommendations are required to further minimize risk to those working and handling subsurface soils during the proposed project construction phase. Therefore, short-term construction impacts associated with hazardous materials would be less than significant.

Long-Term Operational Impacts

Less-than-Significant Impact. Potentially hazardous materials associated with the proposed project operations would include those materials used during typical cleaning and maintenance activities. Although these potential hazardous materials would vary, they would generally include household cleaning products, paints, fertilizers, and herbicides and pesticides. Many of these materials are considered household hazardous wastes, common wastes, and/or universal wastes by the EPA, which considers these types of wastes to be common to businesses and households and to pose a lower risk to people and the environment than other hazardous wastes when properly handled, transported,

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used, and disposed of. Federal, state, and local regulations typically allow these types of wastes to be handled and disposed of with less stringent standards than other hazardous wastes, and many of these wastes do not have to be managed as hazardous waste. Additionally, any potentially hazardous material handled on the project site would be limited in both quantity and concentrations, consistent with other similar industrial uses located in the City, and any handling, transport, use, and disposal would comply with applicable federal, state, and local agencies and regulations. Further, as mandated by OSHA, all hazardous materials stored on the project site would be accompanied by a Material Safety Data Sheet, which would inform employees and first responders as to the necessary remediation procedures in the case of accidental release.

Because of the age of the existing on-site residential structure, there is a possibility that potentially hazardous building materials, such as asbestos-containing material (ACM) or lead-based paint, could be encountered during demolition activities. As a result, the project would be required to comply with SCAQMD Rule 1403, Asbestos Emissions from Demolition/Renovation Activities, which addresses asbestos emissions from demolition and renovation activities, and requires the safe handling of known or suspected ACM. The purpose of SCAQMD Rule 1403 is to specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of ACM. The requirements for demolition and renovation activities include asbestos surveying; notification; ACM removal procedures and time schedules; ACM handling and clean-up procedures; and storage, disposal, and landfiling requirements for asbestos-containing waste materials. All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings (SCAQMD 1989).

Additionally, prior to on-site demolition activities, lead-based-paint testing would be required. This testing would be conducted in adherence with EPA guidelines set forth within 40 CFR Part 745 and the federal Residential Lead-Based Paint Hazard Reduction Act of 1992. Similar to all other potentially hazardous materials encountered during demolition of the existing on-site buildings, if lead-based-paint is determined to occur on site, any effected demolition debris would be removed from the project site by a licensed contractor, and all handling, transport, and disposal of lead-based-paint would adhere to relevant federal, state, and local agencies and regulations.

As previously discussed, the Phase I ESA did not identify soil contamination that would require remediation, restrict any future redevelopment of the project site, or result in classifying any soils as hazardous waste in terms of off-site disposal needs (Appendix E). Therefore, long-term operational impacts associated with hazardous materials would be less than significant.

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

Less-than-Significant Impact. Refer to the response provided in Section 3.8(a).

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

Less-than-Significant Impact. The proposed project site is located approximately 0.5 mile north of Alder Middle School (7555 Alder Avenue) and approximately 0.64 mile northwest of Locust Elementary School (7420 Locust Avenue). Further, as discussed in Section 3.8(a), the proposed project would neither create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, nor would it create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials. Therefore, impacts associated with emitting or handling hazardous materials in the vicinity of a school would be less than significant.

- d) *Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

Less-than-Significant Impact According to the Phase I ESA (Appendix E), the project site is not identified in any federal, state, and local regulatory databases, including those lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (i.e., Cortese List). Therefore, impacts associated with hazardous materials sites would be less than significant.

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

No Impact. The project site is located approximately 10.5 miles northeast of Ontario International Airport and 9.5 miles north of Flabob Airport in the City of Riverside. Based on these relatively large distances, the project site is located outside of any designated hazard area mapped around either of these airports. Therefore, no impact associated with public airport hazards would occur.

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- f) *For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?*

No Impact. No private airstrips or heliports are known to occur within 2 miles of the project site. Therefore, no impact associated with private airstrip hazards would occur.

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

Less-than-Significant Impact With Mitigation Incorporated. Typically, roadway facilities designated by the City of Rialto General Plan Circulation Chapter (City of Rialto 2010a) as major, modified, or secondary arterials, as well as other streets with regional access, are assumed to serve as evacuation routes in the event of a regional emergency. Vehicle access to the project site would be provided via Walnut Avenue and Alder Avenue, which are identified by Figure 3-1 in the Renaissance Specific Plan (City of Rialto 2010b) as a commercial collector street and major arterial street, respectively. While Walnut Avenue does not provide continuous and direct access to a larger local or regional roadway facility. Alder Avenue does provide direct regional access to I-210, and thus, could serve as an emergency evacuation route for the project area.

As discussed further in Section 3.16(e), the proposed project would not result in any adverse effects to Alder Avenue with incorporation of mitigation measures, and as such, would not impede response or evacuation activities in the event of an emergency. Therefore, impacts associated with emergency response and evacuation routes would be less than significant.

- h) *Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?*

No Impact. According to CAL FIRE's 2008 High Fire Hazard Severity Zones, the project site is not located in an area identified as being susceptible to wildland fire. Additionally, the City of Rialto General Plan Exhibit 5.3, Fire Hazards, does not identify the project site as being located in a fire hazards severity zone (City of Rialto 2010a). The project site is located in a predominantly developed portion of the City, and no wildland–urban interfaces occur in the project area. Therefore, no impacts associated with wildland fire would occur.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.9 Hydrology and Water Quality

a) *Would the project violate any water quality standards or waste discharge requirements?*

Short-Term Construction Impact

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

The proposed project would be subject to the municipal NPDES permit, which requires measures to prohibit non-stormwater discharges into the storm sewer and control the discharge of stormwater to the maximum extent practical. These measures include BMPs, control techniques, and system design methods. The Santa Ana Regional Water Quality Control Board (RWQCB) issues the NPDES permits to construction activities of one acre or more. The City falls within the jurisdiction of San Bernardino County, and thus, is subject to the municipal stormwater permit issued by the Santa Ana RWQCB (RWQCB 2010).

The NPDES permit requires implementation of a Storm Water Quality Management Program, which specifies guidelines to control, reduce, and monitor discharges of waste to storm drains (RWQCB 2010). As such, through compliance with the water quality standards set forth in the NPDES permit, the wastewater generated during construction of the proposed project would not adversely affect water quality. Therefore, short-term construction impacts associated with water quality would be less than significant.

Long-Term Operational Impacts

Less-than-Significant Impact. The proposed project would be subject to the municipal stormwater permit, the MS4 Permit, issued to San Bernardino County and incorporated cities within the County by the Santa Ana RWQCB. The MS4 Permit requires implementation of LID BMPs to prevent pollutants from being discharged off site by mimicking pre-development site hydrology and feasible source control. The LID Ordinance is designed to reduce runoff from impervious surfaces, including new development, through landscape design that promotes water retention, permeable surface design, natural drainage systems, and on-site retention where feasible (RWQCB 2010). These project-specific designs would reduce impacts to water quality associated with redevelopment.

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Additionally, the project-specific WQMP ensures appropriate BMPs for post-construction and operations of the proposed project. The combination of LID BMPs, source control, and other treatment control BMPs addressed within the WQMP would address identified pollutants and hydrologic concerns from new development, which could result in impacts to water quality standards (RWQCB 2010). Therefore, long-term impacts associated with associated with water quality would be less than significant.

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

Groundwater Supplies

Less-than-Significant Impact. The project site is located within the San Gabriel Valley Water Company, Fontana Water Company Division (FWC) service area. FWC currently utilizes water from the following sources: Local groundwater basins (Chino Basin, Rialto-Colton Basin, Lytle Basin, and No Man's Land Basin); local surface water (Lytle Creek); and imported surface water (State Water Project water).

FWC receives groundwater supplies from three adjudicated basins, which includes the Chino Basin, Rialto-Colton Basin, and the Lytle Basin, and one un-adjudicated basin known as the No Man's Land Basin. FWC's current available pumping capacity totals approximately 39,300 gpm with individual well production ranging from approximately 165 to 2,700 gpm (San Gabriel Valley Water Company 2016).

The adopted groundwater management plans for the adjudicated Chino Basin, Rialto-Colton Basin, and Lytle Basin are contained within the Chino Basin Judgment, Rialto-Colton Basin Court Decree, and McKinley Decree, respectively. FWC has the legal right to pump groundwater from the Chino Basin pursuant to the 1978 Chino Basin Court Judgment. The Chino Basin Judgment established the Chino Basin Watermaster to account for and implement the management of groundwater in the Chino Basin. The Chino Basin Judgment states the Chino Basin Watermaster "shall levy and collect assessments in each year, pursuant to the respective pooling plans, in amounts sufficient to purchase replenishment water to replace production by any pool during the preceding year that exceeds that pool's allocated share of Safe Yield in the case of the overlying pools, or Operating Safe Yield in the case of the Appropriate Pool." The purpose of the Judgment is to allow for the use of groundwater supplies to meet overlying water demands and provide a mechanism to fund purchases of untreated imported water to

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replenish the groundwater basin to supplement recharge with local stormwater (San Gabriel Valley Water Company 2016).

Groundwater levels are routinely monitored by the Watermaster to prevent future overdraft of the groundwater basin. Legal, regulatory, and other mechanisms are currently in place to ensure that the amount of groundwater pumped in the broader project region does not exceed safe yields/operating safe yields. As such, although the proposed project would rely on water supplies that would be composed, at least in part, of groundwater, all extraction of groundwater for use by FWC is actively managed to prevent overdraft, ensure the long-term reliability of the groundwater basins, and avoid adverse effects to groundwater supplies. Therefore, impacts associated with groundwater supplies would be less than significant.

Groundwater Recharge

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

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

- c) ***Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?***

Less-than-Significant Impact. The proposed project would include a detention/infiltration basin on the property to capture and infiltrate stormwater runoff. All proposed surface waters would flow into on-site catch basins and down drains/area drains. All proposed stormwater would flow into proposed perforated 72-inch chambers, and then infiltrate into the existing soils. All catch basin and curb inlets would be outfitted with trash racks and filter inserts to provide preliminary treatment prior to out-letting into the water quality basins or infiltration systems. Stormwater flows will pass through the infiltration facilities and will then flow through to the public system via sub-surface piping.

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Preventive LID site design practices have been incorporated into the proposed project to maintain the historic drainage pattern by utilizing the same drainage paths and outlets, with the detention/infiltration basins limiting outlet of stormwater to the project site's pre-development condition.

The proposed drainage system would be designed to conform to all applicable federal, state, and local requirements, including the current MS4 Permit adopted by the Santa Ana RWQCB. Compliance with these requirements would ensure the new drainage system is designed to have adequate capacity to capture stormwater flow to prevent erosion or on- or off-site flooding impacts. As such, altering the on-site drainage pattern would be conducted in a manner consistent with all applicable standards related to the collection and treatment of stormwater. Therefore, impacts associated with altering the existing drainage pattern of the project site would be less than significant.

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

Less-than-Significant Impact. Refer to the response provided in Section 3.9(c).

- e) *Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*

Less-than-Significant Impact. The proposed project would include a detention/infiltration basin on the property to capture and infiltrate stormwater runoff. The proposed drainage system would be designed to conform to all applicable federal, state, and local requirements, including the current MS4 Permit adopted by the Santa Ana RWQCB. Compliance with these requirements would ensure the new drainage system is designed to have adequate capacity to capture stormwater flow to prevent the conveyance of sediments, debris, and other constituents potentially contained in on-site stormwater from leaving the site and impacting off-site and downstream receiving waters. Therefore, impacts associated with water quality standards and runoff waters would be less than significant.

- f) *Would the project otherwise substantially degrade water quality?*

Less-than-Significant Impact. Refer to responses provided in Sections 3.9(a), 3.9(c), and 3.9(e).

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- g) ***Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?***

No Impact. According to the Federal Emergency Management Agency Flood Insurance Rate Map No. 06071C7920H (FEMA 2008), the project site is located outside of both a 1% Annual Chance Flood Hazard Zone (100-year floodplain) and 0.2% Annual Chance Flood Hazard Zone (500-year floodplain). Additionally, per the San Bernardino General Plan Hazard Overlay map (County of San Bernardino 2010), the project site is located outside of a dam inundation area. Therefore, no impacts associated with flooding would occur.

- h) ***Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?***

No Impact. Refer to the response provided in Section 3.9(g).

- i) ***Would the project 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?***

No Impact. Refer to the response provided in Section 3.9(g).

- j) ***Would the project result in inundation by seiche, tsunami, or mudflow?***

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.10 Land Use and Planning

a) *Would the project physically divide an established community?*

No Impact. The physical division of an established community is typically associated with the construction of a linear feature, such as a major highway or railroad tracks, or removal of a means of access, such as a local road or bridge, which would impair mobility within an existing community or between a community and an outlying area. The proposed project site is located within the Renaissance Specific Plan area, which was planned to allow for residential, commercial, business center, employment, utility, and park uses.

The project site is located on undeveloped land and is surrounded by a mix of largely industrial land uses, and although scattered residential land use occur in the project vicinity, established residential neighborhoods are not found adjacent to the project site, and thus, the site is not used as a connection between two established communities.

Instead, connectivity in the surrounding project area is facilitated via local roadways and pedestrian facilities. The proposed project would not impede movement between these residences within the project area, within an established community, or from one established community to another. Additionally, the project would include improvements such as new sidewalks that would improve pedestrian connectivity and safety along the project frontage. Therefore, no impacts associated with division of an existing community would occur.

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

Less-than-Significant Impact. The City's General Plan Existing Land Use Map designates the project site as Specific Plan (Figure 3). The City's Zoning Map designates the project site as Renaissance Specific Plan – 14 Employment (Figure 4; Figure 5).

The Renaissance Specific Plan contains development standards that act as a customized set of zoning standards for the project site. This approach allows the City a greater degree of control over the location and design of development within the Specific Plan area, ensuring compliance with the Specific Plan's goals and objectives.

The purpose of the Renaissance Specific Plan – 14 Employment zone is to accommodate a mixture of professional office, light industrial, research and development, business

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park, light manufacturing, assembly, and related storage and support service uses (City of Rialto 2010b). The City has determined that the proposed project is consistent with the City's Zoning Ordinance, and thus, is a permitted use within the Specific Plan. As such, it follows that the proposed project's land uses, activities, and development intensity were already assumed and evaluated in the Renaissance Specific Plan and Renaissance Specific Plan EIR (City of Rialto 2010b), respectively, and the project would then be consistent with the local plans, policies, and regulations governing land use decisions. Therefore, impacts associated with applicable land use plans, policies, and regulations would be less than significant.

- c) ***Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?***

No Impact. The proposed project is not within any habitat conservation plan; natural community conservation plan; or other approved local, regional, or state habitat conservation plan. Therefore, no impacts associated with conservation plans would occur.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.11 Mineral Resources

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

Less-than-Significant Impact. The City contains aggregate mineral resources. According to the City's General Plan, the proposed project site is designated by the State Mining and Geology Board as containing regional significant Portland Cement Concrete-grade aggregated resources.

The project site is located in an urbanized, industrial portion of the City and is bound by existing and future development in all directions. Mineral resource mining is not a

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compatible use with these land uses. The project site is not large enough to effectively extract mineral resources. Considering the existing surrounding land uses and the incompatibility of mineral resource extraction activities in the project area, potential significant mineral resources within the project area are considered unavailable for extraction. Therefore, impacts associated with mineral resources would be less than significant.

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

Less-than-Significant Impact. Refer to the response provided in Section 3.11(a).

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. NOISE – Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.12 Noise

The following analysis is based, in part, on the Noise Assessment Supplement prepared by Dudek in April 2018 and included as Appendix G.

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- a) *Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Short-Term Construction Impacts

Less-than-Significant Impact With Mitigation Incorporated. The project site is bounded on the north by Walnut Avenue and on the west by Alder Avenue. Adjacent land uses include warehouses to the northwest and north, a residence and warehouse to the east, a single residence to the south, and a single residence to the west. Warehouses exist further west, just beyond the single residence to the west, and several other proposed warehouse projects are either proposed and/or already under construction to the north, northeast, east, south, and west.⁴

The construction noise assessment was focused on noise levels that would occur at the distance of the closest residence (i.e., at approximately 250 feet), construction noise levels at greater distances from the site would be less. The Roadway Construction Noise Model was used to predict noise from on-site construction activities, as shown in Table 19.

Table 19
Construction Noise Summary of Results

Receiver Location/ Description	Land Use	Construction Noise Level by Construction Phase (dBA L _{EQ})				
		Phase 1: Demolition	Phase 2: Site Preparation	Phase 3: Grading	Phase 4: Building Construction	Phase 5: Paving
Nearest Receiver / Construction at Nearest Property Boundary	Residential	73	71	72	68	71
Nearest Receivers /Construction at Acoustic Center	Residential	69	67	68	64	64

The highest noise levels from construction are predicted to range from approximately 68 dBA L_{EQ} (during Phase 4) to 73 dBA L_{EQ} (during Phase 1) at the nearest receiver. This maximum noise level is considered to be a peak exposure, applicable to not more than

⁴ In order to be consistent with the baseline conditions outlined in the previous 2016 Noise and Vibration study (Appendix G), the supplemental assessment (Appendix G) takes into account the single-family residences to the south and west of the site; however, both of these adjacent properties are to be developed with warehouse projects in the near future, very likely prior to construction of the proposed project. Thus, these residences will very likely be demolished prior to construction and operation of the proposed project (if they have not already been so); once razed, these residences will no longer represent noise-sensitive receptors.

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10%–15% of the total construction period, only while the construction activity is taking place along the eastern property boundary (i.e., closest to the nearest off-site receiver). The average construction noise levels range from approximately 64 dBA L_{eq} (during Phases 4 and 5) to approximately 69 dBA L_{eq} (during Phase 1).

The proposed project would be required to comply with the City Noise Ordinance (City Municipal Code Section 9.50.070 – Disturbances from Construction Activity) by adhering to the following construction schedule:

Construction activity for site preparation and for future development shall be consistent with City Noise Ordinance requirements, which limits construction activities to the hours between 7:00 a.m. and 5:30 p.m., Monday through Friday and between 8:00 a.m. and 5:00 p.m. Saturday (Oct. 1 through April 30); to the hours between 6:00 a.m. and 7:00 p.m., Monday through Friday and between 8:00 a.m. and 5:00 p.m. Saturday (May 1 through Sept. 30); and prohibiting construction during Sundays and state holidays.

Average noise levels from construction activities may be mildly annoying at times, but restricting construction activities to the daytime period will avoid disruption of evening time relaxation and overnight sleep periods. The Safety and Noise Chapter of the City General Plan does not identify sound level limits for construction activity. As such, the requirements contained in the City Noise Ordinance (Chapter 9.50 of the Rialto Municipal Code) are the only applicable restrictions that regulate construction activity. City Municipal Code Section 9.50.070 specifies time-of-day constraints on construction activity; however, the City Municipal Code does not contain noise-level limits pertaining to construction activity. Therefore, for the purposes of this analysis, project compliance with City Municipal Code Section 9.50.070 would result in a less-than-significant construction noise impact.

Even though construction noise impacts were found to be insignificant, construction noise mitigation measures are still recommended in order to further minimize the potential for annoyance from construction noise for area residents. The recommended mitigation measures are as follows:

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

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- MM-NOI-2** The project contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors to the east and southwest of the site.
- MM-NOI-3** The construction contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receptors to the east and southwest of the site during all project construction.
- MM-NOI-4** During all project site construction, the construction contractor shall limit all construction-related activities that would result in high noise levels to between the hours of 7:00 a.m. and 5:30 p.m. Monday through Friday, and between 8:00 a.m. and 5:00 p.m. Saturday. No construction shall be allowed on Sundays and public holidays.

Implementation of MM-NOI-1 through MM-NOI-4 would further reduce the already less-than-significant impacts associated with the short-term construction noise.

Long-Term Operational Impacts

Off-Site Traffic Noise Analysis

Less-than-Significant Impact. The primary noise-related effect that most industrial projects produce is a potential for off-site increases in traffic, which is the main source of noise in most urban areas. Acoustical calculations (using standard noise modeling equations adapted from the Federal Highway Administration noise prediction model) were performed for the following traffic scenarios: existing, existing plus project, opening year, opening year plus project, cumulative, and cumulative plus project.

Roadway traffic data for use in the traffic noise calculations was obtained from the traffic study prepared by Dudek for the proposed project (Appendix H). The data were presented in passenger car equivalent (PCE) daily volumes. Since the roadway traffic calculations depend upon percentage of autos and trucks comprising the total traffic, the identified PCE volumes for the different traffic scenarios were converted back to volumes segregated into auto, medium-duty truck, and heavy-duty truck volumes. The conversion used the reverse factors identified in the traffic study for converting auto and truck volumes into PCE volumes.

The acoustical modeling calculations take into account the posted vehicle speed, ADT volume, and the estimated vehicle mix. Table 20 presents the noise level results for each

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scenario. Refer to Appendix G for the Federal Highway Administration traffic noise model worksheets.

Noise levels are indicated at 75 feet from the centerline of Walnut Avenue and Alder Avenue, the approximate distance to existing structures along these roadways. Noise levels at distances greater than 75 feet from the centerline of Walnut Avenue and Alder Avenue would be lower due to attenuation provided by increased distance from the noise source. Generally, noise from heavily traveled roadways would experience a decrease of approximately 3 A-weighted decibels (dBA) for every doubling of distance from the roadway. The noise model does not take into account the sound-attenuating effect of intervening structures, barriers, vegetation, or topography. Therefore, the noise levels predicted by the model for Walnut Avenue and Alder Avenue are conservative.

Table 20
Noise Levels for Vicinity Roadways Under Each Traffic Scenario

Traffic Scenario	Roadway Segment (dBA CNEL)			
	Walnut	Alder Baseline to Walnut	Alder Walnut to Renaissance	Alder Renaissance to I-210
Existing	58.3	67.4	68.0	68.4
Existing + Project	61.3	67.4	68.2	68.5
Difference in Noise Level (Project Added Noise)	+ 3.0	0	+ 0.2	+ 0.1
Opening Year	58.4	67.5	68.0	68.4
Opening Year + Project	61.3	67.5	68.3	68.6
Difference in Noise Level (Project Added Noise)	+ 2.9	0	+ 0.3	+ 0.2
Cumulative	63.8	69.1	70.2	70.5
Cumulative + Project	64.9	69.1	70.3	70.7
Difference in Noise Level (Project Added Noise)	+ 1.1	0	+ 0.1	+ 0.2

The proposed project would result in the addition of vehicle trips that would increase traffic noise. A potentially significant project impact would occur where project traffic would increase noise levels from below 65 dB community noise equivalent level (CNEL) to above 65 dB CNEL (where residences exist adjacent to the identified roadway segment). In addition, where existing roadway noise levels are less than 60 dBA CNEL, a 5 dBA CNEL increase would be considered significant; where existing roadway noise is in the range 60 to 65 dBA CNEL, an increase of 3 dBA CNEL would be significant; and where roadway traffic noise is already in excess of 65 dBA CNEL, a 1.5 dBA CNEL increase would be significant (FICON 2000).

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With respect to the traffic noise analysis results presented in Table 20, there are no residential uses located along Walnut Avenue, or between Tamarind Avenue and Alder Avenue. Also, the traffic noise levels along this road segment, even with cumulative and project traffic, would remain just below 65 dBA CNEL. Under the “existing” and “opening” traffic scenarios, the proposed project would increase noise levels by approximately 3 dBA CNEL, compared to the significance threshold of 5 dBA CNEL (noise level without the project would be less than 60 dBA CNEL). In the cumulative scenario for Walnut Avenue, the project would increase traffic noise levels by 1 dBA CNEL, compared to a significance threshold of 3 dBA CNEL. Consequently, project traffic noise impacts along Walnut Avenue would be less than significant.

There are existing residences located along Alder Avenue between Baseline Avenue and Walnut Avenue. However, existing traffic noise levels without the project are already slightly above 65 dBA CNEL. In addition, more importantly, the project traffic would not change the CNEL value for roadway traffic noise along this roadway segment (refer to Table 20). There are no residences along the remaining two segments of Alder Avenue. Project traffic noise contributions along all segments of Alder Avenue would be well below 1 dBA, indicating that proposed project added traffic would have an imperceptible increase to roadway traffic noise levels.

Therefore, the proposed project would not create or contribute to a significant traffic-related noise impact, and no mitigation measures would be required with respect to off-site traffic noise impacts.

On-Site Operational Noise Analysis

Truck loading and unloading, along with slow-moving trucks and forklifts, would result in sound levels of approximately 75 to 80 dBA L_{max} at 50 feet. For residences to the south, the noise attenuation from distance divergence is 15 dBA. Noise associated with loading/unloading and slow-moving trucks and forklifts in the parking area south of the loading docks would be reduced to 60 to 65 dBA L_{max} . This range of maximum noise levels is lower than the typical exterior noise standards of 75 dBA L_{max} during the day (7:00 a.m.–10:00 p.m.) and would not exceed the 65 dBA L_{max} exterior noise standard during the night (10:00 p.m.–7:00 a.m.). Therefore, noise associated with loading/unloading and slow-moving trucks and forklifts in the parking areas would not result in noise levels exceeding the daytime noise standards at the nearest residence approximately 250 feet to the south.

For residences to the west, the noise attenuation from distance divergence is 22 dBA. Noise associated with loading/unloading and slow-moving trucks and forklifts in the

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parking area south of the loading docks would be reduced to 53 to 58 dBA L_{max} at the closest residence to the west. This range of maximum noise levels is lower than the typical exterior noise standards of 75 dBA L_{max} during the day (7:00 a.m.–10:00 p.m.) and the 65 dBA L_{max} exterior noise standard during the night (10:00 p.m.–7:00 a.m.). Therefore, noise associated with loading/unloading and slow-moving trucks and forklifts in the parking areas would not result in noise levels exceeding the daytime noise standards at the nearest residences approximately 500 feet to the west.

For residences to the east, the noise attenuation from distance divergence is 15 dBA. No building shielding effect would occur for truck movement in the parking lot south of the loading docks. Noise associated with loading/unloading and slow-moving trucks and forklifts in the parking area south of the loading docks would be reduced to 60 to 65 dBA L_{max} at the closest residence to the east. This range of maximum noise levels is lower than the typical exterior noise standards of 75 dBA L_{max} during the day (7:00 a.m.–10:00 p.m.) and would not exceed the 65 dBA L_{max} exterior noise standard during the night (10:00 p.m.–7:00 a.m.). Therefore, noise associated with slow-moving trucks and forklifts in the parking areas would not result in noise levels exceeding the daytime noise standards at the nearest residence approximately 250 feet to the east.

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

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

Less-than-Significant Impact. For typical construction activity, the equipment with highest vibration generation potential is the vibratory roller, which would generate 94 VdB at 25 feet or 88 VdB at 50 feet. With the vibration attenuation through distance divergence, the vibration from project construction would be reduced to 76 VdB or lower at the residential buildings to the south and east of the project site. This range of vibration levels from construction equipment or activity would be below the County's 0.2-inch-per-second peak particle velocity (or 94 VdB) threshold. Therefore, impacts associated with groundborne vibration would be less than significant.

c) *Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?*

Less-than-Significant Impact. Refer to the response provided in Section 3.12(a).

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- d) *Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?*

Less-than-Significant Impact With Mitigation Incorporated. Refer to the response provided in Section 3.12(a).

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

No Impact. The project site is located approximately 10.5 miles northeast of Ontario International Airport and 9.5 miles north of Flabob Airport in the City of Riverside. Based on these relatively large distances, the project site is located far enough away from the airplane/air traffic noise generated by either of these airports. Therefore, no impact associated with public airport noise would occur.

- f) *Would the project be within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?*

No Impact. No private airstrips or heliports are known to occur within 2 miles of the project site. Therefore, no impact associated with private airstrip noise would occur.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. POPULATION AND HOUSING – Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.13 Population and Housing

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

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

Because the future tenant is not yet known, the number of jobs that the project would generate cannot be precisely determined. Thus, for purposes of analysis, employment estimates are calculated using average employment density factors reported by SCAG in their publication “Employment Density Study.” This publication reports that the median number of jobs is one employee for every 2,111 square feet of warehouse space in San Bernardino County (SCAG 2001). The proposed warehouse would be approximately 188,712 square feet, and as such, the estimated number of employees required for operation would be approximately 90 employees.

Additionally, current data provided by the California Employment Development Department found that the unemployment rate for San Bernardino County was approximately 5.6% (EDD 2017). As such, the proposed project’s temporary and permanent employment requirements could likely be met by the local existing labor force without people needing to relocate into the project region. The project would not stimulate population growth or population concentration above what is assumed in local and regional land use plans. Therefore, impacts associated with population growth would be less than significant.

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

Less-than-Significant Impact. The project site currently contains one single-family residence. This property owner has amicably entered into a voluntary purchase agreement

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with the applicant, and would no longer occupy the project site. Although it is speculative where the current on-site residents would relocate, assuming that they relocate in the project area, it is expected that they will find available housing opportunities. This assumption is based on the fact that the City has approximately 1,399 vacant housing units (U.S. Census Bureau 2016). Therefore, impacts associated with displacement of housing would be less than significant.

- c) *Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?*

Less-than-Significant Impact. Refer to the response provided in Section 3.13(b).

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

3.14 Public Services

- a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:*

Fire protection?

Less-than-Significant Impact. Fire protection and emergency response services in the project area are provided by the Rialto Fire Department (RFD). The RFD deploys from four fire stations staffed 24 hours per day by career firefighters and one administrative office. The RFD staffs one battalion chief, three engine companies, one truck company,

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and four paramedic ambulances each day. On-duty personnel also provide staffing for a hazardous materials unit and an urban search and rescue unit (City of Rialto 2016b).

Per communication with RFD staff, the closest fire station to the proposed project area is Fire Station 203 (1550 North Ayala Drive) (Grayson, pers. comm. 2018). A suppression unit and an ambulance are staffed at this fire station. There were 4,420 unit responses from Fire Station 203 in 2017. The average response time for all responses within the project area in 2017 was 7 minutes and 5 seconds. Considering the proximity of the project site to the existing RFD facilities, and given the fact that the project site is already located within RFD's service area, the proposed project could be adequately served by the RFD without the construction of new, or the expansion of existing, fire protection and emergency response facilities or services.

Additionally, as previously discussed, the proposed project would not directly or indirectly induce population growth in the City. Although the proposed project could potentially result in a slight, incremental increase in calls for service to the project site in comparison to the existing conditions, this increase is expected to be nominal and would not result in the need for new RFD facilities. Therefore, impacts associated with RFD facilities and response times would be less than significant.

Police protection?

Less-than-Significant Impact. The Rialto Police Department (RPD) is headquartered at 128 North Willow Avenue, approximately 3 miles north of the project site. The station has approximately 157 employees, including roughly 106 sworn officers (RPD 2014a). The RPD serves 28.5 square miles with a population of over 100,000 people and offers a variety of services and assignments, including patrol, K-9, School Resource Officer, Street Crime Attack Team, Investigations, Narcotics, Training/Backgrounds, Community Services, and the Re-Entry Support Team (RPD 2014b).

The proposed project would not directly or indirectly induce population growth in the City. While the project would potentially result in a slight, incremental increase in calls for service to the project site in comparison to the existing conditions, this increase is expected to be nominal and would not result in the need for new RPD facilities. Additionally, the project site is already located within RPD's service area and would not require an expansion of the service area, which could otherwise result in longer response times. Overall, it is anticipated that the project would be adequately served by existing RPD facilities, equipment, and personnel. Therefore, impacts associated with PRD facilities and response times would be less than significant.

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Schools?

No Impact. The City is served by three school districts: the Rialto Unified School District (RUSD), Fontana Unified School District (FUSD), and Colton Joint Unified School District (CJUSD) (City of Rialto 2010a). The project site is within the FUSD, which serves over 37,000 students over 45 campuses with 30 elementary schools, 7 middle schools, 5 comprehensive high schools, 3 alternative high schools, an adult education program, and an after-school program (FUSD 2017).

Neither the construction nor the operation of the proposed project would generate new permanent residents that would increase student populations. As such, the project would not directly or indirectly induce population growth in the City. Therefore, the project would have no effect on the FUSD service abilities. Therefore, impacts associated with FUSD facilities and student-teacher ratios would be less than significant.

Parks?

No Impact. The proposed project would not directly or indirectly induce population growth in the City. Thus, the project would not generate new permanent residents that would increase the use of existing parks such that substantial physical deterioration of facilities would occur or be accelerated. Therefore, no impacts associated with park facilities would occur.

Other public facilities?

No Impact. Given the lack of population growth as a result of the proposed project, it is unlikely that the project would increase the use of libraries and other public facilities. Therefore, no impact associated with libraries and other public facilities would occur.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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3.15 Recreation

- a) *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? Or does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?*

No Impact. The proposed project would not directly or indirectly induce substantial population growth in the City. Neither construction nor operation of the project would generate new residents to the extent that use of existing parks and recreational facilities would increase and result in the physical deterioration of these facilities. Therefore, there would be no impact associated with the increased use of existing recreational facilities.

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

No Impact. Refer to the response provided in Section 3.15(a).

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. TRANSPORTATION/TRAFFIC – Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.16 Transportation and Traffic

The following analysis is based on the TIA prepared by Dudek in May 2018, which is included as Appendix H.

Existing Traffic Conditions

Existing Street System

Local access is provided by various roadways in the vicinity of the project site. The east–west roadway expected to provide local access is Walnut Avenue. The north–south roadway expected to provide local access is Alder Avenue. Regional access is provided via SR-210. The existing traffic controls and geometrics at the study area intersections are shown in Figure 6.

The study area consists of the following eight intersections and five roadway segments.

Intersections

1. Alder Avenue/SR-210 westbound ramps
2. Alder Avenue/SR-210 eastbound ramps
3. Alder Avenue/Renaissance Parkway
4. Alder Avenue/Walnut Avenue
5. Alder Avenue/Baseline Road
6. Tamarind Avenue/Walnut Avenue
7. Tamarind Avenue/ Baseline Road
8. Ayala Drive-Cedar Avenue/Baseline Road

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Roadway Segments

1. Alder Avenue, between SR-210 westbound ramps and eastbound ramps
2. Alder Avenue, between SR-210 eastbound ramps and Renaissance Parkway
3. Alder Avenue, between Renaissance Parkway and Walnut Avenue
4. Alder Avenue, between Walnut Avenue and Baseline Road
5. Walnut Avenue, between Alder Avenue and Tamarind Avenue

Existing Traffic Volumes

Existing peak-hour ADT counts at the study intersections and roadway segments, respectively, were conducted on Tuesday, March 6, 2018, during a typical non-holiday week. Raw traffic count worksheets are provided in Appendix H to this IS/MND. Figure 7 shows the existing weekday AM and PM peak-hour and ADT volumes for the study area roadways.

Existing Intersection Level of Service

An intersection level of service (LOS) analysis was prepared for the existing conditions using the HCM 2010 methodology through the Synchro (version 10) LOS software. The existing LOS for the intersections in the vicinity of the proposed project are shown in Table 21.

Table 21
Existing Weekday Peak-Hour Intersection LOS

No.	Intersection	Traffic Control	AM Peak		PM Peak	
			Delay ¹	LOS ²	Delay ¹	LOS ²
1	Alder Avenue/SR-210 westbound ramps	signalized	24.7	C	25.0	C
2	Alder Avenue/SR-210 eastbound ramps	signalized	23.8	C	19.7	B
3	Alder Avenue/Renaissance Parkway	signalized	22.6	C	34.5	C
4	Alder Avenue/Walnut Avenue	signalized	5.5	A	6.1	A
5	Alder Avenue/Baseline Road	signalized	50.3	D	43.4	D
6	Tamarind Avenue/Walnut Avenue	unsignalized	8.7	A	8.7	A
7	Tamarind Avenue/Baseline Road	unsignalized	127.3	F	28.0	D
8	Ayala Drive-Cedar Avenue/Baseline Road	signalized	34.5	C	37.6	D

Source: Appendix H

Notes:

¹ Delay in seconds per vehicle calculated per HCM methodology

² Level of Service (LOS)

As shown in Table 21, all of the study area intersections, with the exception of Tamarind Avenue/Baseline Road, are currently operating at LOS D or better under existing conditions

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during both peak hours. The Tamarind Avenue/Baseline Road intersection currently operates at LOS F during the AM peak hour.

Per City's LOS standards for unsignalized intersections, no vehicular movement should have an average delay greater than 120 seconds during the AM and PM peak hours. The intersection of Tamarind Avenue/Baseline Road currently operates at LOS F with average delay of 127.3 seconds during the AM peak hour for the most critical approach (northbound left turn). Based on a peak-hour signal warrant analysis, conducted per the *California Manual of Uniform Traffic Control Devices* (CA MUTCD), the existing traffic volumes at Tamarind Avenue/Baseline Road would not satisfy a peak-hour signal warrant.

Existing Roadway Segment Conditions

A roadway segment LOS analysis was prepared for the existing conditions using the roadway segment LOS methodologies. Table 22 shows the results of the existing conditions LOS analysis for the study area roadway segments.

Table 22
Existing Daily Roadway Segment LOS

Roadway Segment	Classification	No. of Lanes	Capacity	ADT ¹	V/C ²	LOS ³
<i>Alder Avenue</i>						
SR-210 WB ramps to SR-210 EB ramps	Secondary Highway	4	24,600	20,300	0.83	D
SR-210 EB ramps to Renaissance Pkwy	Secondary Highway	4	24,600	24,000	0.98	E
Renaissance Pkwy to Walnut Ave	Modified Arterial	4	36,400	18,700	0.51	A/B
Walnut Ave to Base Line Rd	Modified Arterial	3	24,650	11,900	0.48	A/B
<i>Walnut Avenue</i>						
Alder Ave to Tamarind Ave	Commercial Collector	2	13,800	3,410	0.27	A/B

Source: Appendix H

Note: Classification and Capacity is based on City of Rialto's Traffic Impact Analysis Report Guidelines and Requirements, December 2013, RSP 2010 and RSP Amendment 2016.

¹ ADT – Average Daily Trips

² V/C – Volume to Capacity Ratio

³ LOS – Level of Service

As shown in Table 22, with the exception of Alder Avenue, between the SR-210 eastbound ramps and Renaissance Parkway, all of the roadway segments are currently operating at LOS D or better under existing conditions. The roadway segment of Alder Avenue, between SR-210 eastbound ramps and Renaissance Parkway, currently operates at LOS E under existing conditions.

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- a) *Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?*

and

- b) *Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?*

Less-than-Significant Impact With Mitigation Incorporated. For the purposes of analysis, the potential impacts to traffic and circulation were assessed for each of the following conditions:

- Project Completion 2020 Baseline
- Project Completion 2020 plus Project
- Cumulative 2020 Baseline Conditions
- Cumulative 2020 plus Project Conditions

Significance Criteria

City of Rialto

The City allows operations at LOS D as the maximum threshold for the study intersections and roadways during morning and evening peak hours. Projects that degrade LOS below the acceptable level must provide mitigation to maintain minimum LOS. According to City's TIA guidelines, significant impacts may occur at any intersection where the project causes the LOS to fall below LOS D, or when the peak hour delay increases 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

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- LOS F; by 1.0 second

Additionally, delay at unsignalized intersections shall not exceed 120 seconds during AM and PM peak hours. New developments are required to mitigate impacts exceeding these levels.

For roadway segments, the City currently does not have criteria to determine a significant project impact. Therefore, for purposes of this analysis, improvements will be recommended when a roadway operates below LOS D. Roadway segments may, or may not, be governed by signalized intersections at the ends of the segment. If the segment exceeds 1,500 feet, and the volume to capacity (V/C) ratio exceeds 1.0, the segment must be mitigated even if intersections on either end do not exceed LOS D.

Project Traffic

Trip Generation

Trip generation estimates for the proposed project are based on daily and AM and PM peak-hour trip generation rates obtained from the Institute of Transportation Engineers *Trip Generation Manual, 9th Edition* (ITE 2012). Trip generation estimates for the proposed project are based on the trip generation rates for the Institute of Transportation Engineers Land Use 150, Warehousing.

The methodology to calculate the passenger car and truck vehicle mix for a warehouse land use is provided in the City's TIA guidelines. The vehicle mix rates are based on the SCAQMD recommendations for traffic impact studies for warehousing projects. Trip generation rates and resulting trip generation estimates for the proposed project are summarized in Table 23.

Table 23
Project Trip Generation

Land Use		Unit	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Rates									
Warehousing (ITE Land Use 150) ¹		per TSF	3.56	0.24	0.06	0.30	0.08	0.24	0.32
Trip Generation									
Vehicle Mix ²	Percent ³								
Passenger Vehicles	69.0%		403	27	7	34	9	27	36
2-Axle Trucks	6.8%		5	0	0	0	0	1	1
3-Axle Trucks	5.5%		75	5	1	6	2	5	7

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Table 23
Project Trip Generation

Land Use		Unit	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
4+-Axle Trucks	18.7%		188	12	3	16	4	13	17
	100.0%	188.712 TSF	671	44	11	57	15	46	60
PCE Trip Generation	PCE Factor								
Passenger Vehicles	1.0		403	27	7	34	9	27	36
2-Axle Trucks	1.5		8	0	0	0	0	2	2
3-Axle Trucks	2.0		150	10	2	12	4	10	14
4+-Axle Trucks	3.0		564	36	9	45	12	39	51
Trip Generation with PCE			1,125	73	18	91	25	78	103

Notes:

TSF = Thousand Square Feet, PCE = Passenger Car Equivalent

¹ Trip rates from the Institute of Transportation Engineers, Trip Generation, 9th Edition, 2012. Land Use Code 150 – Warehousing.

² Vehicle Mix and Percent from the City of Rialto, Traffic Impact Analysis Report Guidelines and Requirements, December 2013.

³ Passenger Car Equivalent (PCE) factors from County CMP, Appendix B - Guidelines for CMP Traffic Impact Analysis Reports in San Bernardino County, 2016

As shown in Table 23, the proposed project would generate 671 daily trips, 57 AM peak hour trips, and 60 PM peak hour trips. With the application of PCE factors to truck trips, the proposed project would generate 1,125 PCE daily trips, and 91 PCE trips during the AM peak hour (73 inbound and 18 outbound), and 103 PCE trips during the PM peak hour (25 inbound and 78 outbound).

Trip Distribution and Assignment

The proposed project trips were distributed to the study area intersections and roadway segments using the regional location of the project, logical commute routes for employees, and available truck routes for project-related trucks. A majority of truck traffic will access the study area via SR-210 at its existing interchange with Alder Avenue. It was assumed that 50% of the employee (passenger car) traffic would access the project from the south on Alder Avenue via the Alder Avenue/Walnut Avenue intersection, and the remaining 50% of employee traffic would access the project from the north via the Alder Avenue/Walnut Avenue intersection.

The proposed project trips were assigned to the study area intersections by applying the project trip generation estimates to the trip distribution percentages at each study area intersection and roadway segment. The project trip distribution for passenger cars is shown in Figure 8 and the project trip distribution for trucks is shown in Figure 9 for trucks. The resulting project trip assignments for passenger cars and trucks are shown in

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Figures 10 and 11, respectively. The total project trip assignment (total volumes) is shown in Figure 12.

Project Completion 2020 Baseline

The project completion year is anticipated to be 2020. The existing roadway segment and intersection configurations, as shown in Figure 6, have been assumed under Project Completion 2020 Baseline (no project) conditions.

Traffic Volumes

Project completion year baseline traffic volumes were estimated by increasing the existing 2018 traffic counts by an ambient background growth rate of 2% per year per the Scoping Agreement with the City, for a period of 2 years (2018–2020). Figure 13 illustrates the Project Completion 2020 Baseline traffic volumes for the daily and peak-hour conditions.

Intersection Level of Service

An intersection operations analysis was prepared for the study area to evaluate the Project Completion 2020 Baseline weekday AM and PM peak-hour conditions. Intersection operations were calculated using the HCM 2010 methodology. Table 24 shows the results of the Project Completion 2020 Baseline LOS conditions, while the detailed LOS worksheets are included in Appendix H.

Table 24
Project Completion 2020 Baseline Intersection LOS Summary

No.	Intersection	Traffic Control	AM Peak		PM Peak	
			Delay ¹	LOS ²	Delay ¹	LOS ²
1	Alder Avenue/SR-210 westbound ramps	signalized	25.7	C	26.2	C
2	Alder Avenue/SR-210 eastbound ramps	signalized	24.6	C	20.6	C
3	Alder Avenue/Renaissance Parkway	signalized	22.7	C	36.1	C
4	Alder Avenue/Walnut Avenue	signalized	5.5	A	6.1	A
5	Alder Avenue/Baseline Road	signalized	52.2	D	44.3	D
6	Tamarind Avenue/Walnut Avenue	unsignalized	8.7	A	8.8	A
7	Tamarind Avenue/Baseline Road	unsignalized	177.5	F	31.1	D
8	Ayala Drive-Cedar Avenue/Baseline Road	signalized	36.5	D	38.0	D

Source: Appendix H

Notes:

¹ Delay in seconds per vehicle calculated per HCM methodology

² Level of Service (LOS)

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As shown in Table 24, all of the study area intersections, with the exception of Tamarind Avenue/Baseline Road, are forecast to operate at LOS D or better under the Project Completion 2020 Baseline conditions during both peak hours. The Tamarind Avenue/Baseline Road intersection is forecast to continue to operate at LOS F during the AM peak hour.

Per City's LOS standards for unsignalized intersections, no vehicular movement should have an average delay greater than 120 seconds during the AM and PM peak hours. The intersection of Tamarind Avenue/Baseline Road is forecast to continue to operate at LOS F with average delay of 177.5 seconds during the AM peak hour for the most critical approach (northbound left turn). Based on a peak-hour signal warrant analysis, conducted per the CA MUTCD, the Project Completion 2020 Baseline traffic volumes at Tamarind Avenue/Baseline Road would still not satisfy a peak-hour signal warrant.

Roadway Segment Level of Service

A roadway segment LOS analysis was prepared for the Project Completion 2020 Baseline conditions use the roadway segment LOS methodology discussed in Appendix H. Table 25 shows the results of the Project Completion 2020 Baseline LOS conditions for the study roadway segments.

Table 25
Project Completion 2020 Baseline Roadway Segment LOS Summary

Roadway Segment	Classification	No. of Lanes	Capacity	ADT ¹	V/C ²	LOS ³
<i>Alder Avenue</i>						
SR-210 WB ramps to SR-210 EB ramps	Secondary Hwy	4	24,600	21,100	0.86	D
SR-210 EB ramps to Renaissance Pkwy	Secondary Hwy	4	24,600	25,000	1.02	F
Renaissance Pkwy to Walnut Ave	Major Arterial	4	36,400	19,400	0.53	A/B
Walnut Ave to Baseline Rd	Major Arterial	3	24,600	12,400	0.50	A/B
<i>Walnut Avenue</i>						
Alder Ave to Tamarind Ave	Commercial Collector	2	13,800	3,500	0.25	A/B

Source: Appendix H

Notes: Classification and Capacity is based is on City of Rialto's Traffic Impact Analysis Report Guidelines and Requirements, December 2013, RSP 2010 and RSP Amendment 2016.

¹ ADT – Average Daily Trips

² V/C– Volume to Capacity Ratio

³ LOS – Level of Service

As shown in Table 25, with the exception of Alder Avenue, between the SR-210 eastbound ramps and Renaissance Parkway, all of the roadway segments are forecast to operate at LOS D or better. The roadway segment of Alder Avenue, between the SR-210

eastbound ramps and Renaissance Parkway, is forecast to operate at LOS F from LOS E in the existing condition.

Project Completion 2020 plus Project

The Project Completion 2020 plus Project conditions includes the analysis traffic operations under Project Completion Baseline conditions with project-related traffic added to the AM and PM peak-hour traffic volumes, and roadway segment daily traffic volumes. The traffic impacts specific to the project under this condition are the basis for determining the project's specific impacts, mitigation measures, and conditions of approval.

Traffic Volumes

Traffic generated by the proposed project was added to the Project Completion 2020 Baseline traffic volumes, resulting in the Project Completion 2020 plus Project traffic volumes for the daily and peak-hour conditions. The project trip assignment (in PCE) shown in Figure 12 for project traffic, was added to the Project Completion 2020 Baseline traffic volumes shown in Figure 13 to derive the Project Completion 2020 plus Project traffic volumes. Figure 14 illustrates the Project Completion 2020 plus Project traffic volumes.

Intersection Level of Service

An intersection operations analysis was prepared for the study area to evaluate the Project Completion 2020 plus Project weekday AM and PM peak-hour conditions. Table 26 shows the results of the project conditions LOS analysis and detailed LOS worksheets are included in Appendix H.

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Table 26
Project Completion 2020 plus Project Intersection LOS Summary

No.	Intersection	Traffic Control	Project Completion 2020 Baseline				Project Completion 2020 + Project				Change in Delay (in sec)		Potentially Significant Impact	
			AM Peak		PM Peak		AM Peak		PM Peak		AM	PM	AM	PM
			Delay ¹	LOS ²	Delay ¹	LOS ²	Delay ¹	LOS ²	Delay ¹	LOS ²				
1	Alder Ave/SR-210 WB ramps	signalized	25.7	C	26.2	C	27.3	C	28.2	C	1.6	2.0	No	No
2	Alder Ave/SR-210 EB ramps	signalized	24.6	C	20.6	C	25.9	C	20.8	C	1.3	0.2	No	No
3	Alder Ave/Renaissance Pkwy	signalized	22.7	C	36.1	C	22.2	C	37.0	C	-0.5	0.9	No	No
4	Alder Ave/ Walnut Ave	signalized	5.5	A	6.1	A	6.5	B	8.1	A	1.0	2.0	No	No
5	Alder Ave/Baseline Rd	signalized	52.2	D	44.3	D	52.8	D	44.3	D	0.6	0.0	No	No
6	Tamarind Ave/Walnut Ave	unsignalized	8.7	A	8.8	A	8.7	A	8.8	A	0.0	0.0	No	No
7	Tamarind Ave/Baseline Rd	unsignalized	177.5	F	31.1	D	180.4	F	31.1	D	2.9	0.0	Yes	No
8	Ayala Dr-Cedar Ave/Baseline Rd	signalized	36.5	D	38.0	D	36.7	D	38.0	D	0.2	0.0	No	No

HCM = Highway Capacity Manual

¹ Delay in seconds per vehicle

² Level of Service (LOS)

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As shown Table 26, all of the study area intersections, with the exception of Tamarind Avenue/Baseline Road, are forecast to continue to operate at LOS D under Project Completion 2020 plus Project conditions, during both peak hours. The Tamarind Avenue/Baseline Road intersection is forecast to continue to operate at LOS F during the AM peak hour (and LOS D during the PM peak hour) with addition of the proposed project traffic.

Per the City's LOS standards for unsignalized intersections, no vehicular movement should have an average delay greater than 120 seconds during the AM and PM peak hours. The intersection of Tamarind Avenue/Baseline Road is forecast to continue to operate at LOS F with an average delay of 180.4 seconds during the AM peak hour for the most critical approach (northbound left turn) with addition of project traffic. Based on a peak-hour signal warrant analysis, conducted per the CA MUTCD, the Project Completion 2020 plus Project traffic volumes at Tamarind Avenue/Baseline Road would still not satisfy a peak-hour signal warrant.

However, per the City's significance criteria, the proposed project would create a potentially significant impact at Tamarind Avenue/Baseline Road since the delay increase of 2.9 seconds from the baseline condition of LOS F is one second or greater. Therefore, the proposed project would be required to mitigate this intersection.

Roadway Segment Level of Service

A roadway segment LOS analysis was prepared for the Project Completion 2020 plus Project conditions using the roadway segment LOS methodologies, as discussed in Appendix H. Table 27 shows the results of the Project Completion 2020 plus Project conditions LOS analysis for the study roadway segments.

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Table 27
Project Completion 2020 plus Project Road Segment LOS Summary

Roadway Segment	Classification	No. of Lanes	Capacity	Project Completion 2020 Baseline			Project Completion 2020 + Project				Potentially Significant Impact
				ADT ¹	V/C ²	LOS ³	Proj. Traffic	ADT ¹	V/C ²	LOS ³	
Alder Avenue											
- SR-210 WB ramps to SR-210 EB ramps	Secondary Hwy	4	24,600	21,100	0.86	D	452	21,552	0.88	D	No
- SR-210 EB ramps to Renaissance Pkwy	Secondary Hwy	4	24,600	25,000	1.02	F	904	25,904	1.05	F	No
- Renaissance Pkwy to Walnut Ave	Major Arterial	4	36,400	19,400	0.53	A/B	924	20,324	0.56	A/B	No
- Walnut Ave to Baseline Rd	Major Arterial	3	24,600	12,400	0.50	A/B	443	12,843	0.52	A/B	No
Walnut Avenue											
- Alder Ave to Tamarind Ave	Commercial Collector	2	13,800	3,500	0.25	A/B	845	4,345	0.31	A/B	No

Source: Dudek 2018

Note: Classification and Capacity is based is on City of Rialto's Traffic Impact Analysis Report Guidelines and Requirements, December 2013, RSP 2010 and RSP Amendment 2016.

¹ ADT – Average Daily Traffic

² V/C– Volume to Capacity Ratio

³ LOS – Level of Service

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As shown in Table 27, with the exception of Alder Avenue, between SR-210 eastbound ramps and Renaissance Parkway, all of the roadway segments are forecast to continue to operate at LOS D or better under Project Completion 2020 plus Project conditions. The roadway segment of Alder Avenue, between SR-210 eastbound ramps and Renaissance Parkway, is forecast to continue to operate at LOS F under the Project Completion 2020 plus Project conditions.

Per the City's LOS standards for roadway segments, if a roadway segment exceeds 1,500 feet, and the volume-to-capacity ratio exceeds 1.0, the segment must be mitigated. The project would not be required to mitigate this roadway segment; however, it would be required to pay its fair share towards improvements required for this segment to operate at an acceptable LOS.

Cumulative 2020 Baseline Conditions

Cumulative 2020 Baseline (no project) conditions includes traffic generated by other approved and pending projects in the study area, in addition to ambient growth. The traffic volume forecasts in the cumulative condition includes projects that are proposed, and are in the review process, but not yet fully approved. Cumulative projects that would add traffic to the study area intersections and roadway segments are generally within 1 mile of the study area, and are included in the analysis for cumulative conditions. These projects have been provided by the City Traffic Engineer. Since project completion and cumulative conditions are anticipated to be in the same year (i.e., 2020), roadway segment and intersection geometric configurations were assumed the same as in the existing condition scenario (see Figure 6).

A list of cumulative projects was obtained from the City's Public Works Department, and from the neighboring City of Fontana Community Development Department. Based on review of that data, approximately 33 cumulative projects were identified that would potentially add traffic in the study area under cumulative conditions. Figure 15 shows the locations of the cumulative projects.

Cumulative Project Trip Generation

As directed by the City, project trip generation estimates for the cumulative projects were taken from traffic studies prepared for recent development projects in the City to the extent possible. Table 28 provides the summary of trip generation estimates for the cumulative projects. As shown in the table, the cumulative projects are forecast to generate approximately 119,347 daily trips, 8,486 AM peak-hour trips, and 10,835 PM peak-hour trips.

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Table 28
Cumulative Projects Trip Generation Summary

No.	Land Use	Quantity	Units	Daily Trips	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
City of Rialto										
1	Golden Springs	630	TSF	3761	249	67	316	84	254	337
2	SR-210 Logistics III	742.514	TSF	4430	295	79	374	99	299	398
3	Caprock II - Locust/Bohnert	609	TSF	2782	189	49	238	64	190	254
4	Stater Bros									
	Hotel	100	RMS	817	31	22	53	31	29	60
	High-Turnover (Sit-Down) Restaurant	2000	TSF	254	12	11	23	13	9	22
	Pass-by Fast -Food Restaurant			-57	0	0	0	-2	-2	-4
	Fast-Food Restaurant w/D.T.	1000	TSF	716	26	18	44	13	13	26
	Pass-by Fast -Food Restaurant			-161	-6	-4	-10	-3	-3	-6
	Fast-Food Restaurant w/o D.T.	5440	TSF	2699	126	121	247	92	85	177
	Pass-by Fast -Food Restaurant			-638	-31	-30	-61	-20	-20	-40
	Gas Station w/ Conv Mkt and Car Wash	16	VFP	2445	97	93	190	113	109	222
	Pass-by Gasoline/Service Station			-572	-21	-21	-42	-26	-26	-52
	Site Internal Capture (10%)			-693	-29	-27	-56	-26	-25	-51
5	Shaw Development Warehouse	175.9	TSF	1050	70	16	88	23	70	93
6	Lytle Creek SP (10% of capacity)									
	Single-Family Detached Housing	504	DU	4823	95	284	379	321	188	509
	Condominium	336	DU	1952	25	123	148	117	58	175
7	Emmar Enterprise Homes	20	DU	191	4	11	15	13	7	20
8	B+B Plastics	150.27	TSF	963	64	17	81	22	64	86
9	Pupan Pipe Manufacturing	39	TSF	149	22	6	28	10	18	28

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Table 28
Cumulative Projects Trip Generation Summary

No.	Land Use	Quantity	Units	Daily Trips	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
10	Rialto Walmart									
	Free Standing Discount Superstore	197.639	TSF	10501	185	145	330	446	465	911
	Shopping Center	13.712	TSF	589	8	5	13	25	26	51
	High-Turnover (Sit-Down) Restaurant	12.856	TSF	1635	77	71	148	85	59	144
	Gasoline/Service Station	16	VFP	2697	99	95	194	111	111	222
	Pass-by Gasoline/Service Station			-1019	-52	-50	-102	-42	-42	-84
	Fast-Food Restaurant w/D.T.	5.948	TSF	2951	138	132	270	101	93	194
	Pass-by Fast-Food Restaurant			-1328	-66	-63	-129	-48	-44	-92
	Site Internal Capture (10%)			-1837	-51	-45	-96	-77	-75	-152
11	Prologis (Locust at Stonehurst)	473.000	TSF	2824	187	50	237	64	191	255
12	Prologis (Tamarind at Walnut)	384.000	TSF	2292	152	39	191	52	154	206
13	Renaissance Market Place									
	North Side Area	65.756	TSF	4441	89	70	159	115	203	318
	South Side Area	523.567	TSF	13340	213	96	309	547	617	1164
14	I-210 Logistics IV	412.56	TSF	2462	105	28	133	35	106	141
15	SR-210 Logistics V	203.639	TSF	1197	79	22	101	27	81	108
16	Monster Energy	1094.9	TSF	6533	434	115	549	148	411	589
17	PA 108 Building 5	614.848	TSF	6353	571	73	644	458	584	1042
18	PA 108 Building 6	855	TSF	9841	168	946	1114	949	58	1007

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Table 28
Cumulative Projects Trip Generation Summary

No.	Land Use	Quantity	Units	Daily Trips	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
19	Renaissance East									
	Hotel	108	RMS	882	34	23	57	33	32	65
	Hotel Internal Capture (8%)			-71	-3	-2	-5	-3	-3	-6
	Specialty Retail Center	9.1	TSF	403	-	-	-	11	14	25
	Passby Specialty Retail Center (10%)			40	0	0	0	1	1	2
	High-Turnover (Sit-Down) Restaurant	9.17	TSF	1166	55	51	106	60	42	102
	Fast-Food Restaurant w/D.T.	7.62	TSF	3780	177	170	347	129	119	248
	Pass-by Fast-Food Restaurant (10%)			-378	-18	-17	-35	-13	-12	25
20	PA 108 Building 4-B	411.33	TSF	2454	162	44	206	55	165	220
21	Ayres Hotel (SWC of Linden and Renaissance)	135	RMS	1204	52	38	90	47	48	95
22	Alder Distribution Facility (Alder/Miro)	123	TSF	736	48	12	60	17	48	65
23	Locust/Vineyard Warehouse	120.6	TSF	719	47	12	59	17	47	64
24	Renaissance Palmetto Warehouse	340.715	TSF	2033	138	35	173	47	138	185
25	Warehouse (Tamarind at Baseline)	155	TSF	926	60	16	76	18	66	84
26	Building 7,8, and 9 (Kimley Horn Project)	540.427	TSF	3224	216	57	273	73	218	291
27	Gasoline Service Station	8	VFS	1377	42	41	83	56	57	113
28	Gas Station (D and A Project)			3331	152	152	304	118	118	236
29	Casamalia Street Warehouses (Between Linden and Cedar)	138.9	TSF	827	71	73	144	71	73	144
30	Baseline/Alder Warehouse	229.251	TSF	1368	90	24	114	30	92	122

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Table 28
Cumulative Projects Trip Generation Summary

No.	Land Use	Quantity	Units	Daily Trips	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
City of Fontana										
31	Highland Village (17040 South Highland Ave)									
	Shopping Center	55.05	TSF	2351	33	20	53	98	106	204
	Pass by			-799	0	0	0	-33	-36	-69
	Specialty Retail	6.9	TSF	306	6	4	10	8	10	18
	Fast-Food Restaurant W/Drive-Thru	5.833	TSF	2894	135	130	265	90	91	190
	Pass by			-1433	-66	-64	-130	-50	-46	-96
	Car Wash	22	stalls	2376				62	60	122
	Tire Center	5.8		144	11	6	17	10	14	24
32	3,233 sq ft drive through fast food restaurant (16988 S Highland Ave)	3.233	TSF	1604	75	72	147	55	51	106
	Pass by			-786	-37	-35	-72	-27	-25	-52
33	30 Single Family Homes (17064 Baseline Ave)	30	DU	286	6	17	23	19	11	30
Total Trip Generation				119,347	5,041	3,443	8,486	4,933	5,814	10,835

Notes: TSF = '000 square feet, RMS = Rooms, VFP = Vehicle Fueling Pumps, DU = Dwelling Unit

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Cumulative Project Trip Generation and Assignment

Trip distributions and assignments for the cumulative projects were also taken from traffic studies prepared for recent development projects, to the extent possible, or assuming logical commute corridors and/or exiting truck routes when that information was not available. The trips generated by the cumulative projects were distributed through the study area network, primarily along Alder Avenue, Walnut Avenue, and Baseline Road, and then added to the Project Completion 2020 Baseline traffic volumes. Worksheets (in Traffix format) showing the cumulative projects distribution and assignments are provided in Appendix H. Figure 16 illustrates the Cumulative Projects trip assignment for the daily and peak-hour conditions.

Traffic Volumes

Cumulative 2020 Baseline traffic volumes were forecast by adding the cumulative projects' traffic volumes (Figure 16) to Project Completion 2020 Baseline traffic volumes (Figure 13). Figure 17 illustrates the Cumulative 2020 Baseline traffic volumes for the daily and peak-hour conditions.

Intersection Level of Service

An intersection operations analysis was conducted for the study area to evaluate the Cumulative 2020 Baseline weekday AM and PM peak-hour conditions. Intersection operations were calculated using the HCM 2010 methodology described in Appendix H. Table 29 shows the LOS results while detailed LOS worksheets are included in Appendix H.

Table 29
Cumulative 2020 Baseline Intersection LOS Summary

No.	Intersection	Traffic Control	AM Peak		PM Peak	
			Delay ¹	LOS ²	Delay ¹	LOS ²
1	Alder Avenue/SR-210 westbound ramps	signalized	113.6	F	236.9	F
2	Alder Avenue/SR-210 eastbound ramps	signalized	173.3	F	229.4	F
3	Alder Avenue/Renaissance Parkway	signalized	120.8	F	286.2	F
4	Alder Avenue/ Walnut Avenue	signalized	13.7	B	19.5	B
5	Alder Avenue/Baseline Road	signalized	239.2	F	217.9	F
6	Tamarind Avenue/Walnut Avenue	unsignalized	8.6	A	8.7	A
7	Tamarind Avenue/Baseline Road	unsignalized	173.1	F	85.0	F
8	Ayala Drive-Cedar Avenue/Baseline Road	signalized	48.5	D	57.6	E

Source: Appendix H

Notes:

¹ Delay in seconds per vehicle calculated per HCM methodology

² Level of Service (LOS)

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As shown in Table 29, the following intersections are forecast to operate with unsatisfactory LOS under Cumulative 2020 Baseline conditions during the peak hours:

- Alder Avenue/SR-210 westbound ramps (LOS F during both peak hours)
- Alder Avenue/SR-210 eastbound ramps (LOS F during both peak hours)
- Alder Avenue/Renaissance Parkway (LOS F during both peak hours)
- Alder Avenue/Baseline Road (LOS F during both peak hours)
- Tamarind Avenue/Baseline Road (LOS F during both peak hours)
- Ayala Drive-Cedar Avenue/Baseline Road (LOS D during the AM peak hour, and LOS E during the PM peak hour)

Per the City's LOS standards for unsignalized intersections, no vehicular movement should have an average delay greater than 120 seconds during the AM and PM peak hours. The intersection of Tamarind Avenue/Baseline Road is forecast to operate at LOS F in both peak hours, with average delays of 173.1 seconds during the AM peak hour, and 85.0 seconds during the PM peak hour, for the most critical approach (northbound left turn). Based on a peak-hour signal warrant analysis, conducted per the CA MUTCD, the Cumulative 2020 Baseline traffic volumes at Tamarind Avenue/Baseline Road would satisfy a peak-hour signal warrant.

Roadway Segment Level of Service

A roadway segment LOS analysis was conducted for the Cumulative 2020 Baseline conditions using the roadway segment LOS methodology discussed in Appendix H. Table 30 shows the results of the Cumulative 2020 Baseline LOS analysis for the study area roadway segments.

Table 30
Cumulative 2020 Baseline Roadway Segment LOS Summary

Roadway Segment	Classification	No. of Lanes	Capacity	ADT ¹	V/C ²	LOS ³
<i>Alder Avenue</i>						
SR-210 WB ramps to SR-210 EB ramps	Secondary Hwy	4	24,600	40,400	1.64	F
SR-210 EB ramps to Renaissance Pkwy	Secondary Hwy	4	24,600	50,600	2.06	F
Renaissance Pkwy to Walnut Ave	Major Arterial	4	36,400	41,300	1.13	F
Walnut Ave to Baseline Rd	Major Arterial	3	24,600	30,300	1.23	F

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Table 30
Cumulative 2020 Baseline Roadway Segment LOS Summary

Roadway Segment	Classification	No. of Lanes	Capacity	ADT ¹	V/C ²	LOS ³
<i>Walnut Avenue</i>						
Alder Ave to Tamarind Ave	Commercial Collector	2	13,800	7,400	0.54	A/B

Source: Appendix H

Notes: Classification and Capacity is based is on City of Rialto's Traffic Impact Analysis Report Guidelines and Requirements, December 2013, RSP 2010, and RSP Amendment 2016.

¹ ADT – Average Daily Trips

² V/C– Volume to Capacity Ratio

³ LOS – Level of Service

As shown in Table 30, the following roadway segments are forecast to operate with unsatisfactory LOS conditions:

- Alder Avenue, between SR-210 westbound ramps and SR-210 eastbound ramps (LOS F)
- Alder Avenue, between SR-210 eastbound ramps and Renaissance Parkway (LOS F)
- Alder Avenue, between Renaissance Parkway and Walnut Avenue (LOS F)
- Alder Avenue, between Walnut Avenue and Baseline Road (LOS F)

Cumulative 2020 Plus Project Conditions

The Cumulative 2020 plus Project condition includes analysis of traffic operations under Cumulative 2020 Baseline conditions with project-related traffic added to the AM and PM peak-hour traffic volumes, and roadway segment daily traffic volumes. The traffic impacts specific to the project under this condition are the basis for determining the project's cumulative impacts, mitigation measures, fair-share costs, and conditions of approval.

Traffic Volumes

Traffic generated by the proposed project was added to the Cumulative 2020 Baseline traffic volumes resulting in the Cumulative 2020 plus Project traffic volumes for the daily and peak-hour conditions. The project trip assignment (in PCE) shown in Figure 12 for project traffic, was added to the Cumulative 2020 Baseline traffic volumes shown in Figure 17 to derive the Cumulative 2020 plus Project traffic volumes. Figure 18 illustrates the Cumulative 2020 plus Project traffic volumes.

Intersection Level of Service

An intersection operations analysis was prepared for the study area to evaluate the Cumulative 2020 plus Project weekday AM and PM peak-hour conditions. Intersection LOS operations were calculated using the HCM 2010 methodology described in Appendix H. Table 31 shows the results of the Cumulative 2020 plus Project LOS analysis, while detailed LOS worksheets are included in Appendix H.

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Table 31
Cumulative 2020 plus Project Intersection LOS Summary

No.	Intersection	Traffic Control	Cumulative 2020 Baseline				Cumulative 2020 + Project				Change in Delay (in sec)		Potentially Significant Impact	
			AM Peak		PM Peak		AM Peak		PM Peak		AM	PM	AM	PM
			Delay ¹	LOS ²	Delay ¹	LOS ²	Delay ¹	LOS ²	Delay ¹	LOS ²				
1	Alder Ave/SR-210 WB Ramps	signalized	113.6	F	236.9	F	118.6	F	246.1	F	5.0	9.2	Yes	Yes
2	Alder Ave/SR-210 EB Ramps	signalized	173.3	F	229.4	F	180.6	F	240.7	F	7.3	11.3	Yes	Yes
3	Alder Ave/Renaissance Pkwy	signalized	120.8	F	286.2	F	122.8	F	294.2	F	2.0	8.0	Yes	Yes
4	Alder Ave/ Walnut Ave	signalized	13.7	B	19.5	B	19.6	B	27.8	C	5.9	8.3	No	No
5	Alder Ave/Baseline Rd	signalized	239.2	F	217.9	F	241.9	F	219.2	F	2.7	1.3	Yes	Yes
6	Tamarind Ave/Walnut Ave	unsignalized	8.6	A	8.7	A	8.6	A	8.7	A	0.0	0.0	No	No
7	Tamarind Ave/Baseline Rd	unsignalized	173.1	F	85.0	F	179.6	F	85.0	F	6.5	0.0	Yes	No
8	Ayala Dr-Cedar Ave/Baseline Rd	signalized	48.5	D	57.6	E	48.5	D	57.8	E	0.0	0.2	No	No

HCM = Highway Capacity Manual; **Bold** = LOS D or Worse

¹ Delay in seconds per vehicle

² Level of Service (LOS)

* Very high delay

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As shown in Table 31, the following intersections are forecast to operate with unsatisfactory LOS under Cumulative 2020 plus project conditions, during one or both peak hours:

- Alder Avenue/SR-210 westbound ramps (LOS F and ≥ 1.0 second delay increase during both peak hours; significant impact)
- Alder Avenue/SR-210 Eastbound Ramps (LOS F and ≥ 1.0 second delay increase during both peak hours; significant impact)
- Alder Avenue/Renaissance Parkway (LOS F and ≥ 1.0 second delay increase during both peak hours; significant impact)
- Alder Avenue/Baseline Road (LOS F and ≥ 1.0 second delay increase during both peak hours; significant impact)
- Tamarind Avenue/Baseline Road (LOS F and ≥ 1.0 second delay increase during both peak hours; significant impact)
- Ayala Drive-Cedar Avenue/Baseline Road (LOS D in AM peak hour with 0.0 second delay increase, and LOS E in PM peak hour with 0.2 seconds delay increase, not a significant impact)

As indicated above, the proposed project would have a potentially significant impact at the following intersections as addition of project volumes would cause an increase of ≥ 1.0 seconds at LOS F:

- Alder Avenue/SR-210 westbound ramps
- Alder Avenue/SR-210 Eastbound Ramps
- Alder Avenue/Renaissance Parkway
- Alder Avenue/Baseline Road
- Tamarind Avenue/Baseline Road

The proposed project will be required to provide mitigation measures for those potentially significantly impacted intersections.

The intersection of Tamarind Avenue/Baseline Road is forecast to continue to operate at LOS F in both peak hours, with average delays of 179.6 seconds during the AM peak hour, and 85.0 seconds during the PM peak hour, for the most critical approach (northbound left turn). Based on a peak-hour signal warrant analysis, conducted per the CA MUTCD, the Cumulative 2020 plus Project traffic volumes at Tamarind Avenue/Baseline Road would satisfy a peak-hour signal warrant.

Roadway Segment Level of Service

A roadway segment LOS analysis was prepared for the Cumulative 2020 plus Project conditions using the roadway segment LOS methodology discussed in Appendix H. Table 32 shows the results of the Cumulative 2020 plus Project LOS analysis for the study area roadway segments.

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Table 32
Cumulative 2020 Roadway Segment Level of Service

Roadway Segment	Classification	No. of Lanes	Capacity	Cumulative 2020 Baseline			Cumulative 2020 + Project				Potentially Significant Impact
				ADT ¹	V/C ²	LOS ³	Project Traffic	ADT ¹	V/C ²	LOS ³	
Alder Avenue											
- SR-210 WB Ramps to SR - 210 EB Ramps	Secondary Hwy	4	24,600	40,400	1.64	F	452	40,852	1.66	F	Yes
- SR-210 EB Ramps to Renaissance Pkwy	Secondary Hwy	4	24,600	50,600	2.06	F	904	51,504	2.09	F	Yes
- Renaissance Pkwy to Walnut Ave	Major Arterial	4	36,400	41,300	1.13	F	924	42,224	1.16	F	Yes
- Walnut Ave to Baseline Rd	Major Arterial	3	24,600	30,300	1.23	F	443	30,743	1.25	F	Yes
Walnut Avenue											
- Alder Ave to Tamarind Ave	Commercial Collector	2	13,800	7,400	0.54	A/B	845	8,245	0.60	A/B	No

Source: Dudek 2018

Note: Classification and Capacity is based is on City of Rialto's Traffic Impact Analysis Report Guidelines and Requirements, December 2013, RSP 2010 and RSP Amendment 2016.

¹ ADT – Average Daily Traffic

² V/C– Volume to Capacity Ratio

³ LOS – Level of Service

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As shown in Table 32, the proposed project would contribute daily traffic to the following roadway segments that are forecast to continue to operate at LOS F with the addition of project traffic:

- Alder Avenue between SR-210 westbound ramps and SR-210 eastbound ramps
- Alder Avenue between SR-210 eastbound ramps and Renaissance Parkway
- Alder Avenue between Renaissance Parkway and Walnut Avenue
- Alder Avenue, between Walnut Avenue and Baseline Road

However, the proposed project would have a potentially significant impact at the roadway segment of Alder Avenue, between the SR-210 westbound and eastbound ramps, between the SR-210 eastbound ramps and Renaissance Parkway, and between Renaissance Parkway and Alder Avenue. The proposed project will be required to provide a mitigation measure for this potentially significantly impacted roadway segment under the Cumulative 2020 plus Project condition.

Summary of Impacts

Project Completion 2020 plus Project

Intersection Level of Service

The Tamarind Avenue/Baseline Road intersection is forecast to continue to operate at LOS F during the AM peak hour with the addition of project traffic. Per the City's LOS standards for unsignalized intersections, no vehicular movement should have an average delay greater than 120 seconds during the AM and PM peak hours. The intersection of Tamarind Avenue/Baseline Road is forecast to continue to operate at LOS F with an average delay of 180.4 seconds during the AM peak hour for the most critical approach (northbound left turn) with the addition of project traffic.

Based on a peak-hour signal warrant analysis, conducted per the CA MUTCD, the Project Completion 2020 plus Project traffic volumes at Tamarind Avenue/Baseline Road would not satisfy a peak-hour signal warrant. However, since the intersection is currently operating at LOS F (127.3 seconds of delay) and the proposed project would contribute 2.9 seconds of delay, the proposed project would be required to pay its fair-share towards the signalization of the intersection. MM-TRA-1 and MM-TRA-2 would be required to mitigate this impact to a level that is considered less than significant.

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MM-TRA-1 To ensure that all fair-share costs paid by the project applicant to the City of Rialto are set aside and put towards the specific improvements identified in the May 2018 Traffic Impact Analysis report, the project applicant shall coordinate with the City Engineer prior to issuance of a Certificate of Occupancy. This ensures that appropriate and enforceable funding mechanisms are established for all mitigation measures identified in the May 2018 Traffic Impact Analysis report that are not already included in the San Bernardino Association of Governments Nexus Fee Program, Renaissance Fee Program, the City of Rialto's Capital Improvement Program, or similar program.

MM-TRA-2 Prior to issuance of a Certificate of Occupancy, the project applicant shall pay the City or Rialto's required fees, and contribute their fair-share cost to signalize the intersection of Tamarind Avenue/Baseline Road, as deemed by the City Engineer. The project's fair share at this intersection is 0.7%, and the resulting fair-share cost for this improvement would be \$2,649.01.

Once signalized, the intersection at Tamarind Avenue/Baseline Road would operate with satisfactory LOS (LOS D or better), and the project's impact would be reduced to a level of less than significant.

Roadway Segment Level of Service

The roadway segment of Alder Avenue, between SR-210 eastbound ramps and Renaissance Parkway, is forecast to continue to operate at LOS F under the Project Completion 2020 plus Project conditions. The project would not be required to mitigate this roadway segment; however, it would be required to pay its fair share towards improvements required for this segment to operate at an acceptable LOS (see MM-TRA-3). With implementation of MM-TRA-3, this impact would be considered less than significant.

MM-TRA-3 Prior to issuance of a Certificate of Occupancy, the project applicant shall pay the City of Rialto's required fees, and contribute their fair-share cost to improve the roadway segment of Alder Avenue, between State Route 210 eastbound ramps and Renaissance Parkway with the following improvements:

- Construct roadway segment to a 6-lane Arterial

The project's fair share along this roadway segment is 3.3%; the resulting fair-share cost for this improvement would be included in the project's total cost towards SR-210/Alder Avenue Interchange improvement, estimated to be a total of \$76,442.80.

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Cumulative 2020 plus Project

Intersection Level of Service

The following intersections are forecast to operate with unsatisfactory LOS under Cumulative 2020 plus Project conditions, during one or both peak hours, and the proposed project would create a potentially significant impact at these locations, as addition of project volumes would cause an increase of ≥ 1.0 seconds at LOS F:

- Alder Avenue/SR-210 westbound ramps (LOS F and ≥ 1.0 second delay increase during both peak hours; significant impact)
- Alder Avenue/SR-210 Eastbound Ramps (LOS F and ≥ 1.0 second delay increase during both peak hours; significant impact)
- Alder Avenue/Renaissance Parkway (LOS F and ≥ 1.0 second delay increase during both peak hours; significant impact)
- Alder Avenue/Baseline Road (LOS F and ≥ 1.0 second delay increase during both peak hours; significant impact)
- Tamarind Avenue/Baseline Road (LOS F and ≥ 1.0 second delay increase during AM peak hour; significant impact)

The proposed project will be required to provide the following mitigation measures (MM-TRA-4 through MM-TRA-8) for those potentially significantly impacted intersections:

MM-TRA-4 Prior to issuance of a Certificate of Occupancy, the project applicant shall pay the City or Rialto's required fees, and contribute their fair-share cost to improve the intersection of Alder Avenue/State Route (SR-) 210 westbound ramps with the following improvements:

- Add second westbound left turn lane
- Add second northbound left turn lane
- Add southbound right turn lane

This intersection is part of the SR-210/Alder Avenue Interchange Improvement and all of the above-mentioned improvements are included in the Feasibility Study Report. The project's fair share at this intersection is 1.9%, and the resulting fair-share cost for this improvement would be included in the project's total cost towards the SR-210/Alder Avenue Interchange, estimated to be a total of \$76,442.80.

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MM-TRA-5 Prior to issuance of a Certificate of Occupancy, the project applicant shall pay the City or Rialto's required fees, and contribute their fair-share cost to improve the intersection of Alder Avenue/State Route (SR-) 210 eastbound ramps with the following improvements:

- Add dedicated eastbound left-turn lane
- Restripe eastbound left-through lane to left-through-right lane
- Add dedicated northbound right-turn lane
- Signal modification

This intersection is part of the SR-210/Alder Avenue Interchange Improvement and all of the above-mentioned improvements are included in the FSR. The project's fair share at this intersection is 3.0%, and the resulting fair-share cost for this improvement would be included in the project's total cost towards the SR-210/Alder Avenue Interchange, estimated to be a total of \$76,442.80.

MM-TRA-6 Prior to issuance of a Certificate of Occupancy, the project applicant shall pay the City or Rialto's required fees, and contribute their fair-share cost to the Renaissance Fee Program to improve the intersection of Alder Avenue/Renaissance Parkway with the following improvements:

- Add dedicated westbound right-turn lane (included in FSR)
- Add second southbound left-turn lane (included in FSR)
- Restripe southbound right-turn lane to through-right (included in FSR)
- Signal modification (included in FSR)
- Add second westbound left-turn lane
- Add dedicated northbound right lane
- Add second eastbound through lane
- Re-stripe westbound right to westbound through lane

This intersection is part of the SR-210/Alder Avenue Interchange Improvement and some of the above-mentioned improvements are included in the FSR. The project's fair share at this intersection is 2.4%, and the resulting fair-share cost for this improvement would be included in

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the project's total cost towards SR-210/Alder Avenue Interchange, estimated to be a total of \$76,442.80.

For the improvements not included in the FSR, the project's fair share at this intersection is 2.4%, and the resulting fair-share cost for this improvement would be \$2,510.77.

MM-TRA-7 Prior to issuance of a Certificate of Occupancy, the project applicant shall pay the City of Rialto's required fees, and contribute their fair-share cost to the San Bernardino Association of Governments Nexus Fee to improve the intersection of Alder Avenue/Baseline Road with the following improvements:

- Add eastbound through lane
- Add dedicated eastbound right-turn lane
- Add westbound through lane
- Add dedicated westbound right-turn lane
- Add northbound through lane
- Add dedicated northbound right-turn lane
- Add second southbound left-turn lane
- Add southbound through lane
- Signal modification

The project's fair share at this intersection is 0.8%, and the resulting fair-share cost for this improvement would be \$3,914.40 as payment to the San Bernardino Association of Governments Nexus Fee would cover their fair-share cost.

MM-TRA-8 Prior to issuance of a Certificate of Occupancy, the project applicant shall pay the City of Rialto's required fees, and contribute their fair-share cost to improve the intersection of Tamarind Avenue/Baseline Road with the following improvements:

- Install new traffic signal

The project's fair share at this intersection is 0.7%, and the resulting fair-share cost for this improvement would be \$2,649.01.

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Once the improvements above are constructed, most of the potentially significantly impacted intersections would operate with satisfactory LOS (LOS D or better), and the project's impact would be reduced to a level of less than significant. The exception would be the intersection of Alder Avenue/Renaissance Parkway where the PM peak hour is forecast to operate at LOS E (61.1 seconds of delay) with the mitigation measure implemented (from LOS F with 294.2 seconds of delay).

While this intersection is forecast to continue to operate with unsatisfactory conditions with the proposed mitigation measures at LOS E (from LOS F with mitigation), overall delay at the intersection would be significantly improved by 233.1 seconds. The payment of the project's fair-share cost to construct the mitigation measure would offset the project's 8.0-second delay increase at the intersection since the improvements would improve the delay by 233.1 seconds. Therefore, project impacts at Alder Avenue/Renaissance Parkway would be reduced to a level of less than significant.

Roadway Segment Improvements

The proposed project would create a potentially significant impact by contributing daily traffic to the following roadway segments that are forecast to continue to operate at LOS F with the addition of project traffic:

- Alder Avenue between SR-210 westbound ramps and SR-210 eastbound ramps
- Alder Avenue between SR-210 eastbound ramps and Renaissance Parkway
- Alder Avenue between Renaissance Parkway and Walnut Avenue
- Alder Avenue between Walnut Avenue and Baseline Road

The project would not be required to mitigate these roadway segments; however, it would be required to pay its fair share towards improvements required for them to operate at an acceptable LOS (see MM-TRA-9).

MM-TRA-9 Prior to issuance of a Certificate of Occupancy, the project applicant shall pay the City of Rialto's required fees, and contribute their fair-share cost to improve the roadway segment of Alder Avenue, between Renaissance Parkway and Walnut Avenue with the following improvements:

- Construct roadway segment to a 6-lane Arterial

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The project's fair share at this roadway segment is 3.9%, and the resulting fair-share cost for this improvement would be \$11,317.94 as payment to the San Bernardino Association of Governments Nexus Fee would cover their fair-share cost.

MM-TRA-10 Prior to issuance of a Certificate of Occupancy, the project applicant shall pay the City of Rialto's required fees, and contribute their fair-share cost to improve the roadway segment of Alder Avenue, between Walnut Avenue and Baseline Road with the following improvements:

- Construct roadway segment to a 4-lane Arterial

The project's fair share at this roadway segment is 2.4%, and the resulting fair-share cost for this improvement would be \$0.00 as payment to the SANBAG Nexus Fee and Renaissance Specific Plan Fee would cover their fair-share cost.

Figure 19 illustrates mitigation measures described above, while Table 33 provides an LOS summary with the implementation of the mitigation measures for the Cumulative 2020 plus Project condition. Table 33 provides a summary of the fair-share costs for the study area intersections and roadway segments.

Table 33
Fair-Share Cost for Traffic Impact Mitigation Measures

Intersection Improvements	Cost Estimate		SANBAG Nexus	Renaissance Fee Program	Net Cost Estimate	Project Fair-Share %	Project Cost
<i>Alder Ave/SR-210 WB Ramps</i>							
• add 2nd WBL turn lane	Included in \$2,327,000	1					
• add 2nd NBL turn lane		1					
• add SBR turn lane		1					
<i>subtotal</i>						1.9%	
<i>Alder Ave/SR-210 EB Ramps</i>							
add dedicated EBL turn lane	Included in \$2,327,000	1					
re-stripe EBL-t to EB-LTR		1					
add dedicated NBR turn lane		1					
signal cost (modification)		1					
<i>subtotal</i>						3.0%	

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Table 33
Fair-Share Cost for Traffic Impact Mitigation Measures

Intersection Improvements	Cost Estimate		SANBAG Nexus	Renaissance Fee Program	Net Cost Estimate	Project Fair-Share %	Project Cost
<i>Alder Ave/Renaissance Pkwy</i>							
add dedicated WBR turn lane	Included in \$2,327,000	1					
add 2nd SBL turn lane		1					
re-stripe SBR to SB-TR		1					
signal cost (modification)		1					
<i>subtotal</i>						2.4%	
<i>Alder Ave - SR-210 WB ramps to SR-210 EB ramps</i>							
Improve to 6-Lane Arterial	Included in \$2,327,000	1				2.2%	
<i>Alder Ave - SR 210 EB Ramps to Renaissance Pkwy</i>							
Improve to 6-Lane Arterial	Included in \$2,327,000	1				3.3%	
<i>subtotal</i>	\$2,327,000					3.3%	\$76,442.80
<i>Alder Ave/Renaissance Pkwy</i>							
add 2nd WBL turn lane	\$72,898	3					
add dedicated NBR	\$72,898	3					
add 2nd EBT turn lane	\$72,898	3					
re-stripe WBR to WBT	<i>nominal</i>	3					
<i>subtotal</i>	\$218,694			\$113,750	\$104,944	2.4%	\$2,510.77
<i>Alder Ave/Baseline Rd</i>							
add EBT lane	\$361,574	2					
add dedicated EBR turn lane	\$91,506	2					
add WBT lane	\$361,574	2	\$580,808				
add dedicated WBR turn lane	\$72,898	2	\$116,162				
add NBT lane	\$361,574	2					
add dedicated NBR turn lane	\$72,898	2					
add 2nd SBL turn lane	\$72,898	2	\$116,162				
add SBT lane	\$361,574	2	\$580,808				
signal cost (modification)	\$109,347	2					
<i>subtotal</i>	\$1,865,843		\$1,393,940		\$471,903	0.8%	\$3914.40
<i>Tamarind Ave/Baseline Rd</i>							
new signal	\$400,000	1					
<i>subtotal</i>	\$400,000				\$400,000	0.7%	\$2,649.01
<i>Alder Ave - Renaissance Pkwy to Walnut Ave</i>							
4-Lane Arterial to 6-Lane Arterial	\$ 2,332,736	4	\$2,044,444		\$288,290	3.9%	\$11,317.94

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Table 33
Fair-Share Cost for Traffic Impact Mitigation Measures

Intersection Improvements	Cost Estimate		SANBAG Nexus	Renaissance Fee Program	Net Cost Estimate	Project Fair-Share %	Project Cost
<i>Alder Ave – Walnut Ave to Baseline Rd</i>							
Walnut Ave to Miro Way – 3-Lane Arterial to 4-Lane Arterial	\$1,457,960	⁴	\$2,555,556		-	2.4%	\$0.00
Miro Way to Baseline Road – 2-Lane Arterial to 4-Lane Arterial							
TOTAL PROJECT SHARE							\$85,516.97

Notes:

- ¹ Mitigation and total cost included in the Feasibility Study Report on Alder Avenue/ SR-210 Interchange in the City of Rialto.
- ² TIA for Renaissance Specific Plan Amendment (RSPA) 2016, Table 3-F-Year 2035 with RSPA Funding Mechanism and Fair Share Cost Estimates.
- ³ Based on cost for turn lanes in RSPA 2016.
- ⁴ Traffic Impact Assessment for Renaissance Specific Plan Amendment (RSPA) 2016, Table 3-I-Year 2035 with RSPA Roadway Segment Funding Mechanism and Fair Share Cost Estimates.

- c) ***Would the project 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?***

No Impact. The project site is located approximately 10.5 miles northeast of Ontario International Airport and 9.5 miles north of Flabob Airport in City of Riverside. Based on these relatively large distances, the project site is not located at a proximity where the proposed project could interfere with overhead air traffic. Therefore, no impact associated with air traffic interference would occur.

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

and

- e) ***Would the project result in inadequate emergency access?***

Less-than-Significant Impact With Mitigation Incorporated. The following analysis discussed the project characteristics and potential impacts in respect to on-site circulation, access, driveway queuing, and traffic signal warrants.

On-Site Circulation

Per the project site plan, paved internal drive aisles would be provided along the northern, southern, and western sides of the project site. The drive aisle along the northern side of the property would be 26 feet wide, and would provide direct access to passenger-car

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parking spaces on both sides of the drive aisle. The drive aisle along the southern side would be 34 feet wide to accommodate trucks destined to the docks on the western side of the warehouse. Passenger car parking spaces are proposed along the northern side of this drive aisle. The drive aisle along the western side would be 40 feet wide to accommodate trucks, and would widen to 132 feet in the dock area to accommodate truck maneuvers. Passenger car parking would be provided on both sides of the drive aisle in the northern section of this aisle, while truck/trailer parking would be provided in the southern half of this aisle. Gated entry locations are proposed on both sides of the truck parking and dock areas, on the southern and western drive aisles. To allow for efficient on-site circulation during the AM and PM peak hours, the proposed project will open both gates to the truck docking area from 7:00 a.m. to 9:00 a.m., and 4:00 p.m. to 6:00 p.m., to allow project-related passenger-cars (employees and visitors) and trucks to circulate around the project site. The tenants will provide a reciprocal access easement, should the building be divided between different tenants,

The project site would include 129 parking spaces, 22 loading docks, 34 trailer parking spaces, and a secure bicycle storage area. All of the proposed parking spaces are on-grade and are 90-degree parking stalls that meet the City's standards. Due to the standard layout of the parking stalls, provision of three project access driveways, and drive aisles along the perimeter of the site (including Alder Avenue on the eastern side), the on-site circulation for passenger cars and trucks is expected to be adequate.

Truck Turning Analysis

Since the project is an industrial warehouse and 40% of the project traffic is anticipated to be medium and heavy vehicles, a truck turning analysis was conducted to determine the adequacy of on-site circulation for trucks using *AutoTurn* software.

Trucks used in this analysis were based upon the length of the trailer stalls within the site (approximately 53 feet), which correspond to the American Association of State Highway Transportation Officials (AASHTO) vehicle standards. Figure 20 details the inbound truck turning radii. Inbound truck traffic will proceed into the site from Walnut Avenue, head southbound through a secured (sliding and swing) gate towards the loading dock area containing 22 docks and 34 trailer stalls, then back into a dock. The analysis shows there is sufficient driveway width at the Walnut Avenue driveway, and within the dock area for the trucks to complete inbound docking maneuvers. Figure 21 details the outbound truck turning radii. Outbound truck traffic will exit the loading dock area, proceed northbound, and finally exit onto Walnut Avenue. As with the inbound truck analysis, there is sufficient space for trucks to maneuver within the project site. The figure also illustrates the inbound truck turning radii for trucks entering the project site

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from Alder Avenue. Inbound truck traffic will proceed into the site from Alder Avenue, head westbound through a secured (sliding and swing) gate towards the loading dock area, then backing into a dock. The analysis shows there is sufficient driveway width at the Alder Avenue driveway, and within the dock area for the trucks to complete inbound docking maneuvers.

With a driveway width of 40 feet and a 35-foot curb radius, the western driveway on Walnut Avenue would only be able to accommodate one truck, inbound or outbound, at a time. Per Table 23 – Project Trip Generation, approximately 12 inbound and 3 outbound 4-or-more-axle trucks would be generated by the project in the AM peak hour; and, 4 inbound and 13 outbound 4-or-more-axle trucks in the PM peak hour. This is an average of approximately one truck every 4 to 5 minutes arriving and departing from the site during both peak hours. With these average headways, the Walnut Avenue and Alder Avenue driveways would be able to accommodate project-related truck traffic without significantly impacting traffic operations on Walnut Avenue and Alder Avenue.

Project Access and Queuing

Access to the project site would be provided by three driveways: 1) a full-access driveway at the northwest corner of the project site, off Walnut Avenue; 2) a right-turn in/out driveway at the northeast part of the project site, off Walnut Avenue (for passenger vehicles only); and 3) a right-turn in/out driveway at the southeast corner of the project site, off Alder Avenue. Based on the roadway geometrics for the proposed project access driveways and the Project Completion plus Project and Cumulative 2020 plus Project peak hour traffic volumes, the project access intersections were analyzed for peak hour level of service. Table 34 shows the results of the project driveway LOS.

Table 34
Project Access LOS Analysis

Project Access Intersection	Critical Movement	Project Completion 2020 + Project				Cumulative 2020 + Project			
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
		Delay ¹	LOS ²	Delay ¹	LOS ²	Delay ¹	LOS ²	Delay ¹	LOS ²
Walnut Ave/Proj Access 1	NBL	8.6	A	9.1	A	9.0	A	11.4	B
Walnut Ave/Proj Access 2	NB	8.7	A	9.3	A	9.1	A	11.4	B
Alder Ave/Proj Access 3	EB	10.6	B	10.3	B	14.1	B	14.8	C

HCM = Highway Capacity Manual

¹ Delay in seconds per vehicle

² Level of Service (LOS)

As shown in Table 35, all of the project access intersections are forecast to operate with satisfactory LOS at LOS C or better during the AM peak hour and the PM peak hour under

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Project Completion plus Project conditions and Cumulative 2020 plus Project conditions. The detailed LOS worksheets for project access intersections are included in Appendix H.

A queuing analysis was conducted at the three project driveways and the adjacent intersection at Alder Avenue/Walnut Avenue to determine the AM and PM peak hour 95th percentile (design) queues for the Project Completion 2020 plus Project and Cumulative 2020 plus Project conditions. Table 35 provides a summary of the queuing analysis and the detailed worksheets are included in Appendix H.

Table 35
Project Access Queuing Analysis

Project Access	Critical Movement	Existing Pocket Length (in feet)	95th Percentile Queue Length (in feet)			
			Proj Comp 2020 + Proj		Cumulative 2020 + Proj	
			AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour
Walnut Ave/Proj Access 1	WBL	no pocket ¹	13	15	26	9
	NBLR	on site ²	33	46	37	383
Walnut Ave/Proj Access 2	NBR	on site ²	18	33	23	150
Alder Ave/Proj Access 3	EBR	on site ²	8	14	8	15
Alder Ave/Walnut Ave	EBL	195	79	132	172	204
	EBR	195	38	48	64	216

Note: Queue length expressed in feet.

¹ There is no turn storage pocket on Walnut Avenue.

² Vehicular queues would occur on site.

As shown in Table 35, peak queues on the westbound lane of Walnut Avenue at the western (primary) project driveway would not exceed the length of one vehicle (a passenger car, assumed to be 22 feet, including spacing for front and rear of vehicle) during the peak hours of both analysis conditions. At the Alder Avenue/Walnut Avenue intersection, the eastbound queues on the eastbound left- and right turn lanes could be accommodated within the storage lanes with exception to the PM peak hour in the Cumulative 2020 plus Project condition. In that condition, the queue would extend 9 feet (one vehicle) beyond the eastbound left turn storage pocket and 21 feet (one vehicle) beyond the eastbound right turn storage pocket.

The on-site outbound queues in both peak hours would be approximately two vehicles or less in the Project Completion 2020 plus Project condition, and the AM peak hour of the Cumulative 2020 plus Project condition. However, in the PM peak hour of the Cumulative 2020 plus Project condition, the on-site outbound queues would be 383 feet (approximately 17 vehicles) at the (primary) western driveway (Project Access 1) on Walnut Avenue, and 150 feet (approximately 7 vehicles) at the eastern driveway (Project Access 2) on Walnut Avenue. This on-site queuing is likely associated with the PM peak

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hour queues on the eastbound approach of Walnut Avenue at its intersection with Alder Avenue. The queuing would occur on site and would not significantly impact the operations on Walnut Avenue. Per the intersection LOS analyses above, the Alder Avenue/Walnut Avenue intersection is forecast to operate at LOS C during the PM peak hour in the Cumulative 2020 plus Project condition. As an alternative route, these outbound queued vehicles would also have the opportunity to exit the site via the right turn in/out driveway on Alder Avenue.

Safety and Operational Improvements

The project access driveways and improvements, as described in MM-TRA-2 through MM-TRA-10, will be required to be designed per City and industry standards so that adequate sight distance for drivers entering and exiting the site is maintained. The line of sight – a straight line between the driver's eye and oncoming vehicles on the adjacent roadway defines the Limited Use Area. The Limited Use Area for each driveway will be kept clear of visual obstructions, including project signs, building structures, and landscaping in order to maintain adequate sight distance.

Traffic Signal Warrant Analysis

On-Site Intersections

All three-project access driveways including a full-access driveway along Walnut Avenue and two right-in-right-out driveways along Walnut Avenue and Alder Avenue are proposed to be unsignalized. Each project access was analyzed as an unsignalized intersection with project traffic under Project Completion 2020 plus Project, and Cumulative 2020 plus Project conditions. All the project access driveways are forecast operate with satisfactory LOS (LOS C or better), and per the peak hour approach traffic volumes, would not warrant signalization. Table 35 provides the LOS analysis summary for all the project access intersections.

Off-Site Intersections

As previously discussed, the Tamarind Avenue/Baseline Road intersection would meet the CA MUTCD peak hour traffic signal warrant for peak hour conditions under the Cumulative 2020 Baseline and Cumulative 2020 plus Project conditions. Signal warrant calculations are provided in Appendix H.

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- f) *Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?*

No Impact. The project does not include any improvements that would extend into adjacent roadways or otherwise impede public transit, bicycle, or pedestrian facilities.

Transit System

Omnitrans is the transit provider in the City, and within the Renaissance SP area. Currently, two Omnitrans bus routes, Route 10 and Route 22, provide service to the Renaissance SP area. The nearest Route 10 bus stop to the project site is located on Baseline Avenue near its intersection with Alder Avenue, approximately 0.5 miles south of Walnut Avenue/Alder Avenue intersection. Route 22 connects North Rialto to South Rialto and has a transfer point with Route 10 at the intersection of Baseline Road and Riverside Avenue. The proposed project would not interfere with the existing transit routes.

Pedestrian and Bicycle Facilities

Certain segments of Alder Avenue are currently under construction due to new developments that are widening Alder Avenue to its ultimate width. As these segments of Alder Avenue are widened, pedestrian and bicycle facilities (i.e., sidewalks and bike lanes/routes), will be constructed per City/Renaissance SP specifications. On Walnut Avenue, there are existing continuous meandering sidewalks on both sides of the street between Tamarind Avenue and Alder Avenue. Per the Renaissance Specific Plan's *Bicycle and Pedestrian Circulation Plan*, on-street public bike lanes (Class II – striped) and sidewalks are proposed along Alder Avenue; and, on-street (Class III – signed) public bike routes and sidewalks are proposed along Walnut Avenue. The proposed project would not impede on this improvements, and includes the construction of a new sidewalk along the project frontage, which may be used by pedestrians and bicyclists. Therefore, no impacts associated with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities would occur.

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

3.17 Tribal Cultural Resources

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

Less-than-Significant Impact. As previously discussed in Section 3.5(a), the project site does not contain any resources that are either 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). Therefore, impacts associated with historical resources would be less than significant.

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

Less-than-Significant Impact with Mitigation Incorporated. As part of the government-to-government consultation efforts prescribed under AB 52, the City notified all Native American tribes on the City's AB 52 list of the project, inviting the tribes to consult on the project. To date, the City has received two responses to the notification letter. One response from the San Manuel Band of Mission Indians was received indicating the proposed project area exists within Serrano ancestral territory and, therefore, is of interest to the tribe. However, due to the nature and location of the proposed project, and given the Cultural Resources Management Department's present state of knowledge, the San Manuel Band of Mission Indians does not have any concerns with the proposed project's implementation, as planned, at this time. As such, the San Manuel Band of Mission Indians requests the proposed project incorporate language regarding the discovery of Native American cultural resources (MM-TRC-1), the discovery of archaeological resources (MM-CUL-1), and discovery of human remains, which is discussed in Section 3.5(d).

In addition, one request for consultation was received from the Gabrieleno Band of Mission Indians, and consultation is scheduled for October 24, 2018. As such, consultation between the Native American representative and the City is currently ongoing, and any resulting consultation comments will be incorporated prior to the public hearing.

As addressed earlier, because of the disturbed nature of the project area, the archaeological sensitivity of the project site is considered to be low. While the need for on-site monitoring is not supported by existing conditions found on the project site, the City is committed to preserving the integrity of cultural resources. Thus, MM-TCR-2 would be required to ensure that tribal monitors have access to the project site during subsurface construction activities.

MM-TCR-1 All archaeological resources unearthed by project construction activities shall be evaluated by the qualified archaeologist and Native American monitor. If the resources are Native American in origin, the tribe shall coordinate with the landowner regarding

treatment and curation of these resources. The treatment plan established for the resources shall be in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) shall be the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis.

MM-TCR-2 Prior to the issuance of any grading permit for the project, the City of Rialto (City) shall ensure that the construction contractor provide access for Native American monitoring during ground-disturbing activities. This provision shall be included on project plans and specifications. The project site shall be made accessible to any Native American tribe requesting to be present, provided adequate notice is given to the construction contractor and that a construction safety hazard does not occur. The monitor(s) shall be approved by a local tribal representative and shall be present on site during the construction phases that involve any ground-disturbing activities. The monitor(s) shall possess Hazardous Waste Operations and Emergency Response (HAZWOPER) certification. In addition, the monitor(s) shall be required to provide insurance certificates, including liability insurance, for any archaeological resource(s) encountered during grading and excavation activities pertinent to the provisions outlined in the California Environmental Quality Act (CEQA), California Public Resources Code Division 13, Section 21083.2 (a) through (k).

Neither the City, project applicant, nor construction contractor shall be financially obligated for any monitoring activities. If evidence of any tribal cultural resources is found during ground-disturbing activities, the monitor(s) shall have the capacity to halt construction in the immediate vicinity of the find, in order to recover and/or determine the appropriate plan of recovery for the resource. The recovery process shall not unreasonably delay the construction process.

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Construction activity shall not be contingent on the presence or availability of a monitor, and construction may proceed regardless of whether or not a monitor is present on site. The on-site monitoring shall end when the project site grading and excavation activities are completed or when the monitor has indicated that the site has a low potential for archaeological resources.

Implementation of MM-TRC-1, MM-TRC-2, and MM-CUL-1 would reduce potential impacts to buried, currently unrecorded/unknown tribal cultural resources to a less-than-significant level.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.18 Utilities and Service Systems

- a, e) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? Or would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

Less-than-Significant Impact. The proposed project would discharge wastewater into the Inland Empire Utilities Agency's (IEUA) jurisdiction. The IEUA provides wastewater treatment service along the western border of the City of Rialto and the City of Fontana. The IEUA currently operates four regional wastewater treatment facilities, including Regional Plant No. 1 (RP-1), RP-4, RP-5, and Carbon Canyon Wastewater Reclamation Facility (IEUA 2016a).

The project site is located within the RP-1 service area. According to the IEUA's UWMP (IEUA 2016b), RP-1 has a rated, permitted treatment capacity of 44 million gallons per day (MGD), and biosolids treatment capacity equivalent to a wastewater flow rate of 60 MGD. The facility is currently treating an average of 28 MGD, with a capacity of 44 MGD, meaning that it operates at only 65% of its capacity (IEUA 2016a). Once operational, the proposed project would generate wastewater at a rate of approximately 11,200 gallons per day (gpd) based on wastewater generation rates previously approved by the IEUA (2,500 gpd/acre for industrial use). Based on this rate, the project would only represent 0.04% of RP-1's capacity, representing only a nominal increase in the amount of wastewater treated daily by the wastewater treatment plant. As such, the RP-1 facility would have to capacity to accept wastewater from the proposed project. No new wastewater treatment facilities or expansion of existing facilities would be required in result of the proposed project. Therefore, impacts associated with wastewater treatment requirements and capacity would be less than significant.

- b, d) Would the project 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 effects? Or would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?*

Water Facilities

Less-than-Significant Impact. The project site is located within the San Gabriel Valley Water Company, FWC service area. FWC currently utilizes water from the following

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sources: Local groundwater basins (Chino Basin, Rialto-Colton Basin, Lytle Basin and No Man's Land Basin); Local surface water (Lytle Creek); and Imported surface water (State Water Project water).

As discussed in FWC's 2015 UWMP, with a reduction in demands as a result of water conservation, FWC's Single and Multiple Dry Year supplies are adequate to meet projected Dry Year demands (FWC 2016). The UWMP is used to develop water supply assessments and other key water supply reliability documents in support of providing water service to existing customers and future development in accordance with adopted General Plans and established Spheres of Influence. The methodology used in the UWMP was, in part, based on Southern California Association of Government (SCAG) data based on the populations in each of these areas using land use information from approved City and County General Plans. Thus, if follows, if a project is consistent with the General Plan land use designation that was assumed in the UWMP, then the findings in the UWMP would apply. In this case, the proposed project is consistent with the project site's General Plan land use designation (Specific Plan) and would not require any type of General Plan Amendment or zone change. As such, the density/intensity assumed for the project site in the UWMP would remain be maintained following implementation of the proposed project, and the project would not adversely affect the City's ability to continue to supply water during normal and drought conditions. Therefore, impacts associated with water supplies and facilities would be less than significant.

Wastewater Treatment Facilities

Less-than-Significant Impact. Refer to the response provided in Section 3.18(a).

- c) ***Would the project 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?***

Less-than-Significant Impact. The proposed project would include a detention/infiltration basin on the property to capture and infiltrate stormwater runoff. All proposed surface waters would flow into on-site catch basins and down drains/area drains. All proposed stormwater would flow into proposed perforated 72-inch chambers, and then infiltrated into the existing soils. All catch basin and curb inlets would be outfitted with trash racks and filter inserts to provide preliminary treatment prior to out letting into the water quality basins or infiltration systems. Stormwater flows will pass through the infiltration facilities and will then flow through to the public system via sub-surface piping.

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The construction of this underground infiltration system would be constructed as part of the proposed project, and any potential environmental impacts associated with construction or operation of these stormwater facilities have been accounted for in the discussion of overall proposed project impacts within this IS/MND. Therefore, impacts associated with stormwater drainage facilities would be less than significant.

- f) *Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? Or would the project comply with federal, state, and local statutes and regulations related to solid waste?*

Less-than-Significant Impact. Solid waste generated in the City is collected and transported by the City's contract waste hauler, Burrtec Waste Industries (City of Rialto 2018). Once collected, solid waste is transported to sorting/disposal facilities permitted to accept residential and commercial solid waste, with each facility's operations routinely inspected by regional and state regulatory agencies for compliance with all applicable statutes and regulations. Burrtec Waste Industries operates three material recovery facilities in Southern California, which sort and process (Burrtec Waste Industries 2017). Due to its proximity to the project site, the remaining waste would likely go to the Mid-Valley Landfill, located in the City.

The California Department of Resources Recycling and Recovery (Cal Recycle) publishes solid waste generation rates based on land use types. According Cal Recycle, manufacturing/warehouse uses generate 1.42 pounds per 100 square feet per day (Cal Recycle 2016). Based on these generation rates, construction of the proposed 188,712-square-foot warehouse building could generate solid waste at a rate of approximately 2,670 pounds of solid waste per day.⁵

The Mid-Valley Landfill currently has a maximum permitted throughput of 75,000 tons per day and a remaining capacity of 67,520,000 cubic yards (Cal Recycle 2010). As a result, solid waste generated by the project would represent a nominal percentage of the collective maximum daily throughput permitted for this landfill. Additionally, because a portion of the site is developed with a residential use, a portion the project site is already generating solid waste. Thus, the overall increase in solid waste being transferred from the project site to the land as a result of the project would be nominal. Therefore, impacts associated with permitted landfill capacity would be less than significant.

⁵ This estimate does not account for diversion of recyclables from the solid waste stream, and, thus, should be considered a conservative projection.

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- g) *Would the project comply with federal, state, and local statutes and regulations related to solid waste?*

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

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

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

3.19 Mandatory Findings of Significance

- a) *Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?*

Less-than-Significant Impact with Mitigation Incorporated. As discussed in Section 3.4, implementation of MM-BIO-1, MM-BIO-2, and MM-BIO-3 would reduce potential direct and indirect impacts to burrowing owl and other nesting birds to a less-than-significant level.

Additionally, because of the low potential for the inadvertent discovery of cultural resources within the project site, the project archaeologist determined that no additional management recommendations are necessary beyond standard measures to address unanticipated discoveries of cultural and paleontological resources and human remains, as outlined in MM-CUL-1 and MM-CUL-2. Based on compliance with MM-CUL-1, impacts to buried, currently unrecorded/unknown archaeological and paleontological resources would be less than significant. Therefore, with mitigation incorporated, the project would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

- b) *Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*

Less-than-Significant Impact. When evaluating cumulative impacts, it is important to remain consistent with Section 15064(h) of the CEQA Guidelines, which states:

- (1) When assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project’s incremental effect, though individually limited, is cumulatively considerable. “Cumulatively considerable” means that

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the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

- (2) A lead agency may determine in an initial study that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. When a project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through mitigation measures set forth in a mitigated negative declaration, the initial study shall briefly indicate and explain how the contribution has been rendered less than cumulatively considerable.
- (3) A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. When relying on a plan, regulation or program, the lead agency should explain how implementing the particular requirements in the plan, regulation or program ensure that the project's incremental contribution to the cumulative effect is not cumulatively considerable. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding that the project complies with the specified plan or mitigation program addressing the cumulative problem, an EIR must be prepared for the project.
- (4) The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the project's incremental effects are cumulatively considerable.

With this stated, the project would potentially result in project-related air quality, biological resources, cultural resources, GHG emissions, noise, transportation and traffic, and tribal cultural resources impacts that could be potentially significant without the incorporation of mitigation. Thus, when coupled with air quality, biological resources, cultural resources, GHG emissions, noise, transportation and traffic, and tribal cultural resources impacts related to the implementation of other related projects throughout the broader project area, the project would potentially result in cumulative-level impacts if these significant impacts are left unmitigated.

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

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

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

No impact. As evaluated throughout this document, with the incorporation of mitigation, environmental impacts associated with project would be reduced to less-than-significant levels. Therefore, with mitigation incorporated, the project would not directly or indirectly cause substantial adverse effects on human beings.

4 REFERENCES AND PREPARERS

4.1 References Cited

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4.2 List of Preparers

Individuals and Organizations Consulted

Rialto Fire Department

Sean Grayson, Fire Chief

Preparers

City of Rialto

Gina Gibson, Planning Manager

Daniel Rosas, Assistant Planner

Dudek

Collin Ramsey, Project Manager

Shannon Baer, Environmental Analyst

Sabrina Alonso, Environmental Analyst

Elizabeth Denniston, Archaeologist/Cultural Resource Specialist

Ryan Henry, Senior Biologist

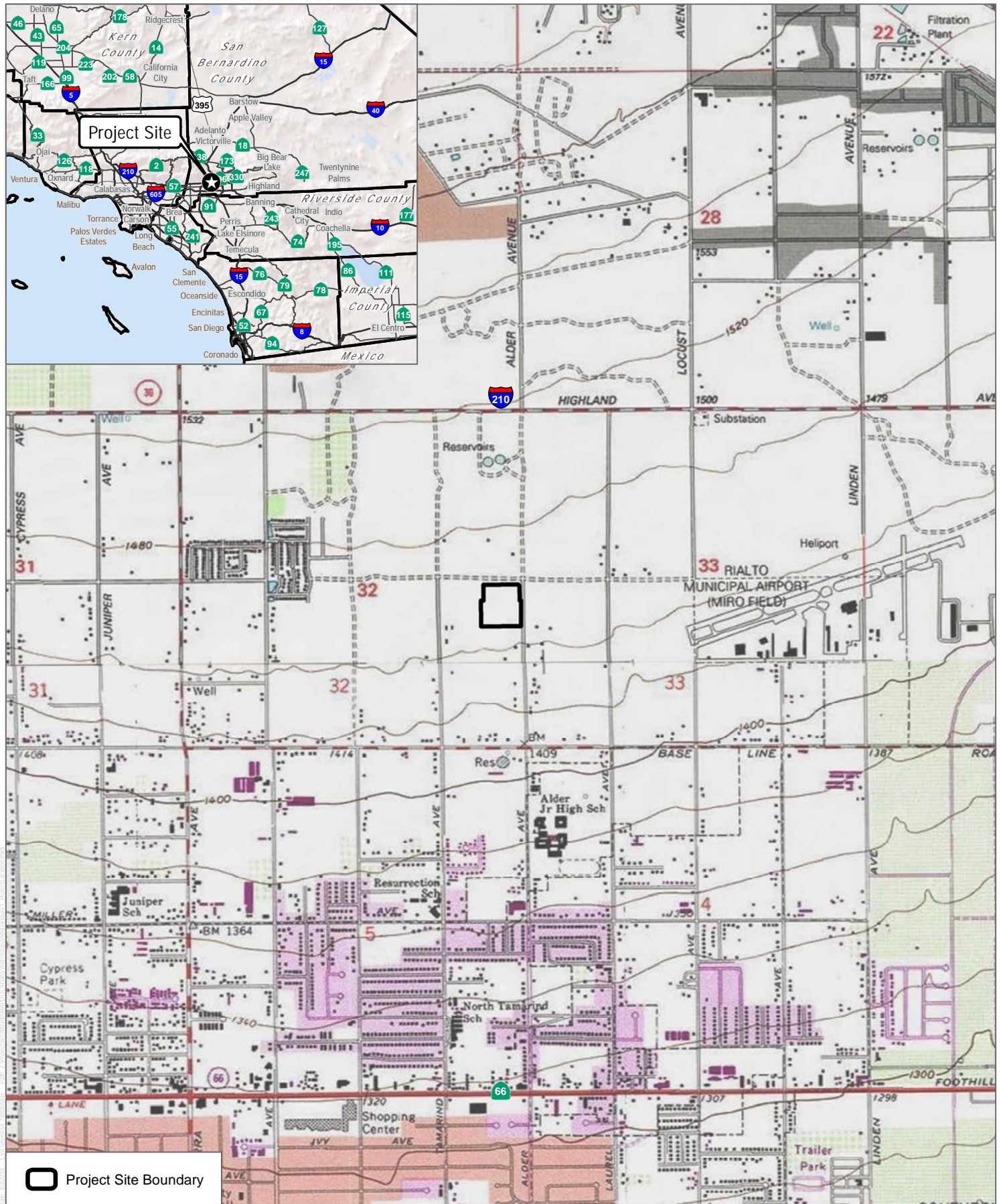
Dennis Pascua, Transportation and Traffic Specialist

Matthew Morales, Air Quality Specialist

Jonathan Leech, Acoustical Specialist

Rachel Strobridge, GIS Specialist

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SOURCE: USGS 7.5-Minute Series Devore Quadrangle

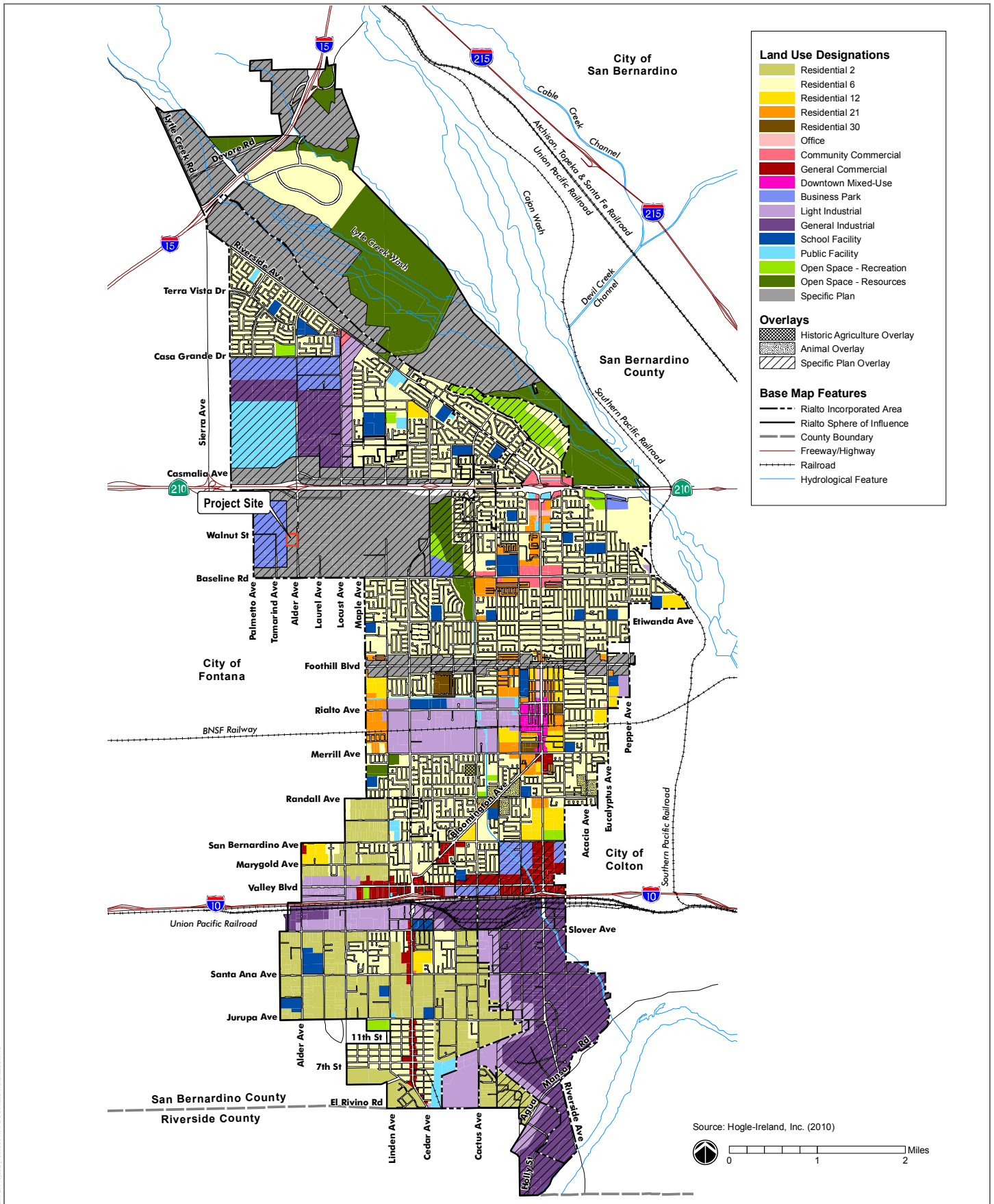
FIGURE 1

Project Location

Walnut/Alder Warehouse Project

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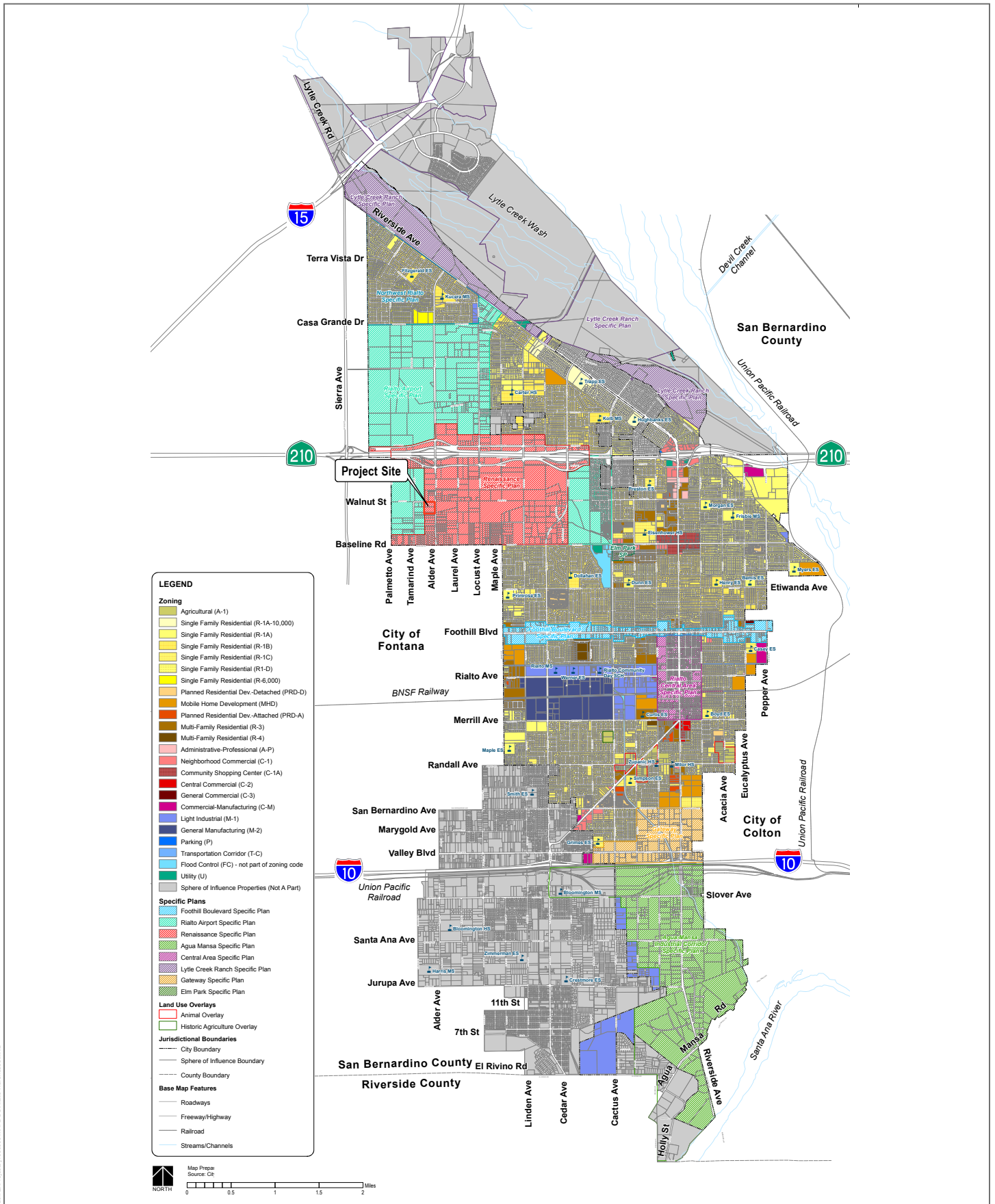


SOURCE: City of Rialto 2010; Hogle-Ireland, Inc. 2010

FIGURE 3

General Plan Land Use
Walnut/Alder Warehouse Project

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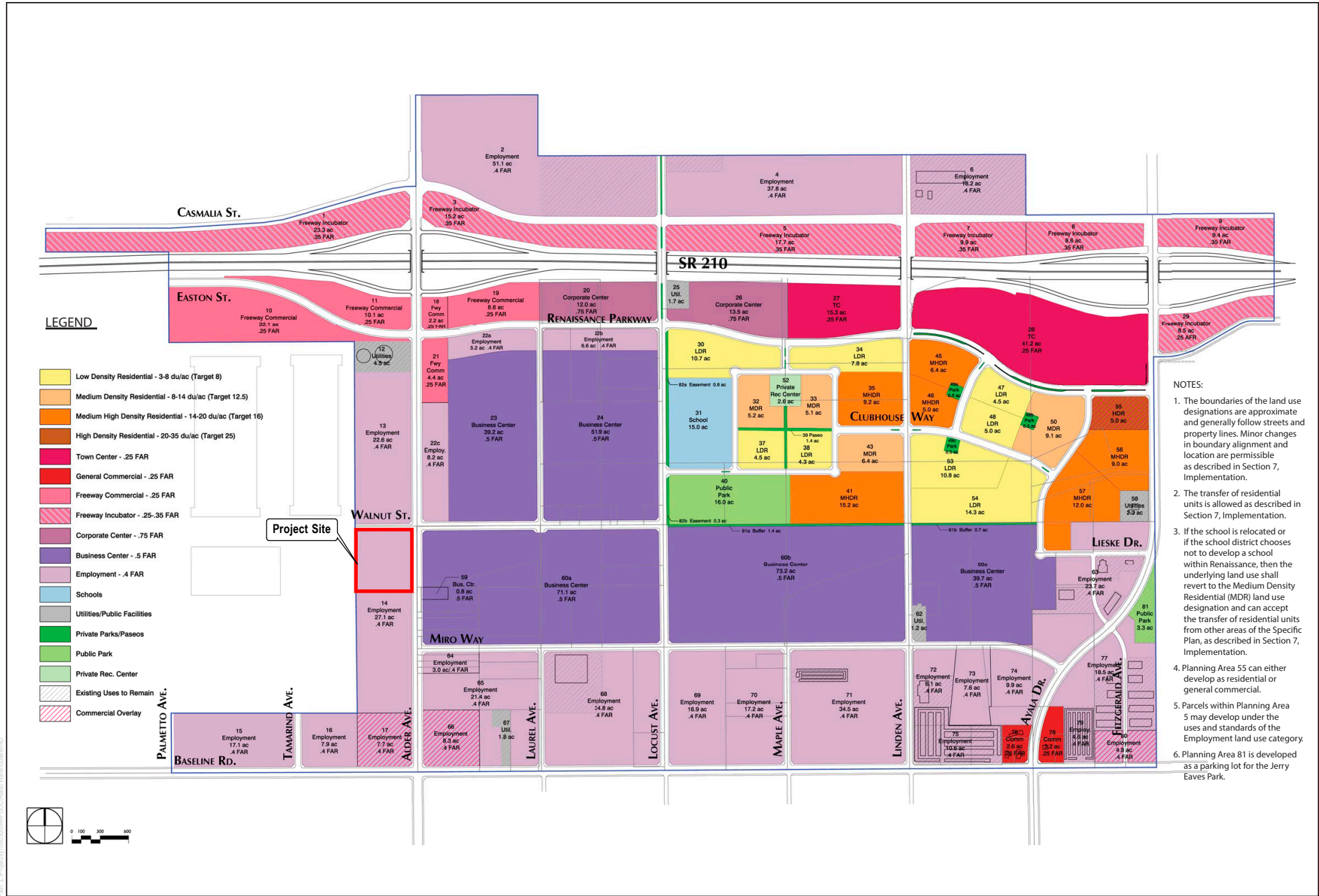
SOURCE: City of Rialto 2010; San Bernardino County 2011; Hogle-Ireland, Inc. 2012

FIGURE 4

Zoning

Walnut/Alder Warehouse Project

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SOURCE: City of Rialto 2010

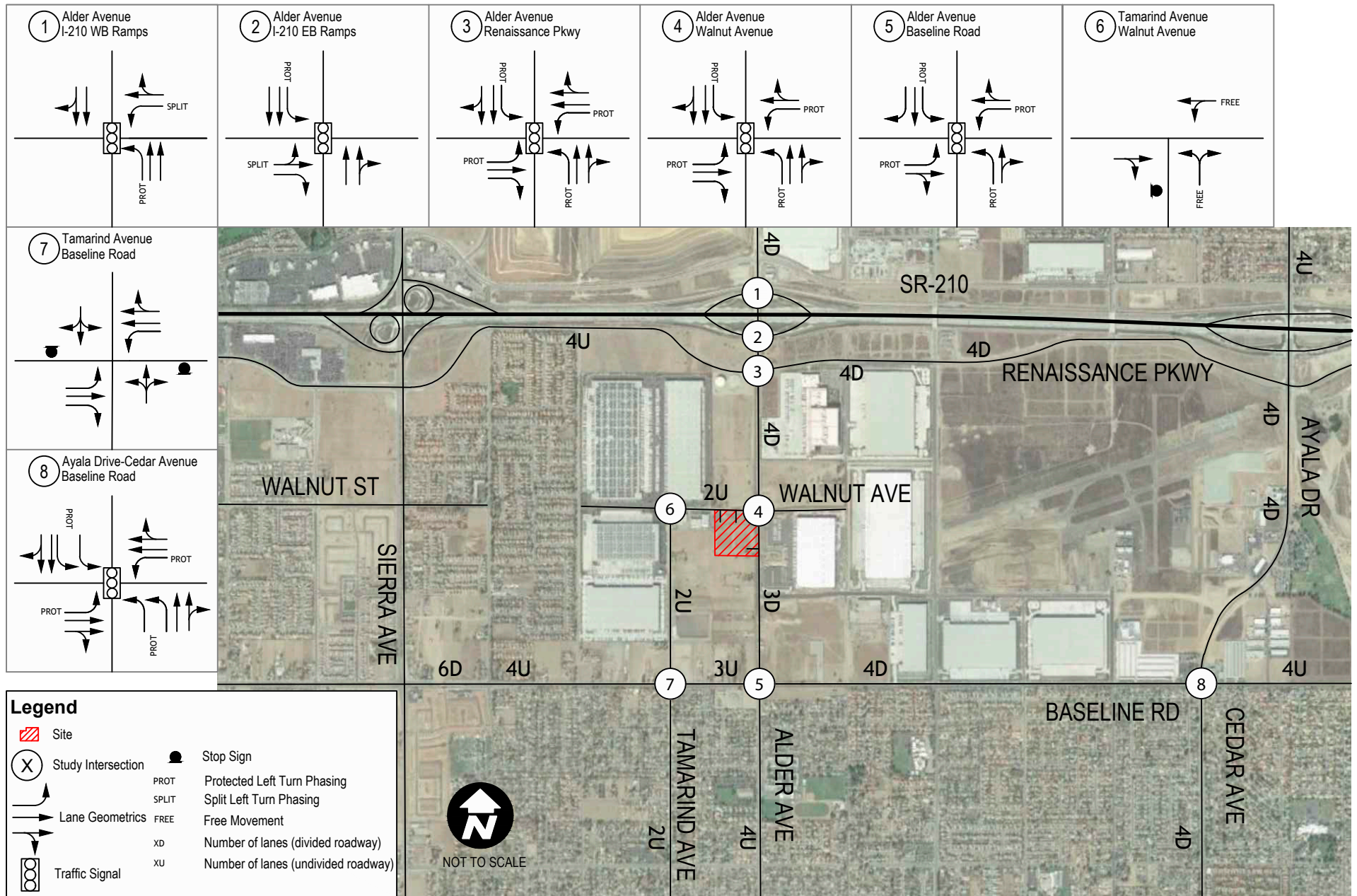
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FIGURE 5

Renaissance Specific Plan Land Use

Walnut/Alder Warehouse Project

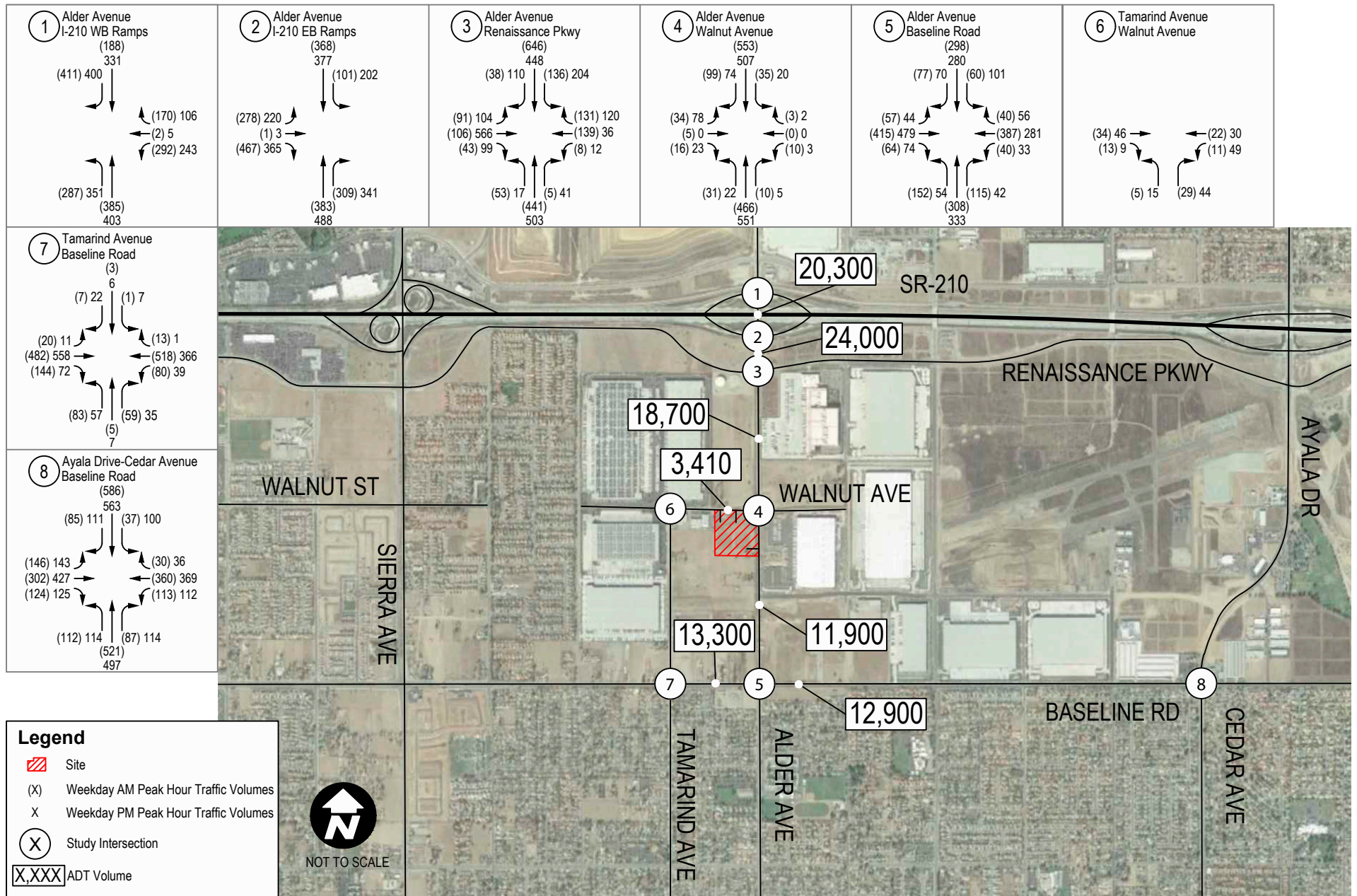
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SOURCE: Google Earth 2016

FIGURE 6
Existing Traffic Controls and Geometrics
Walnut/Alder Warehouse Project

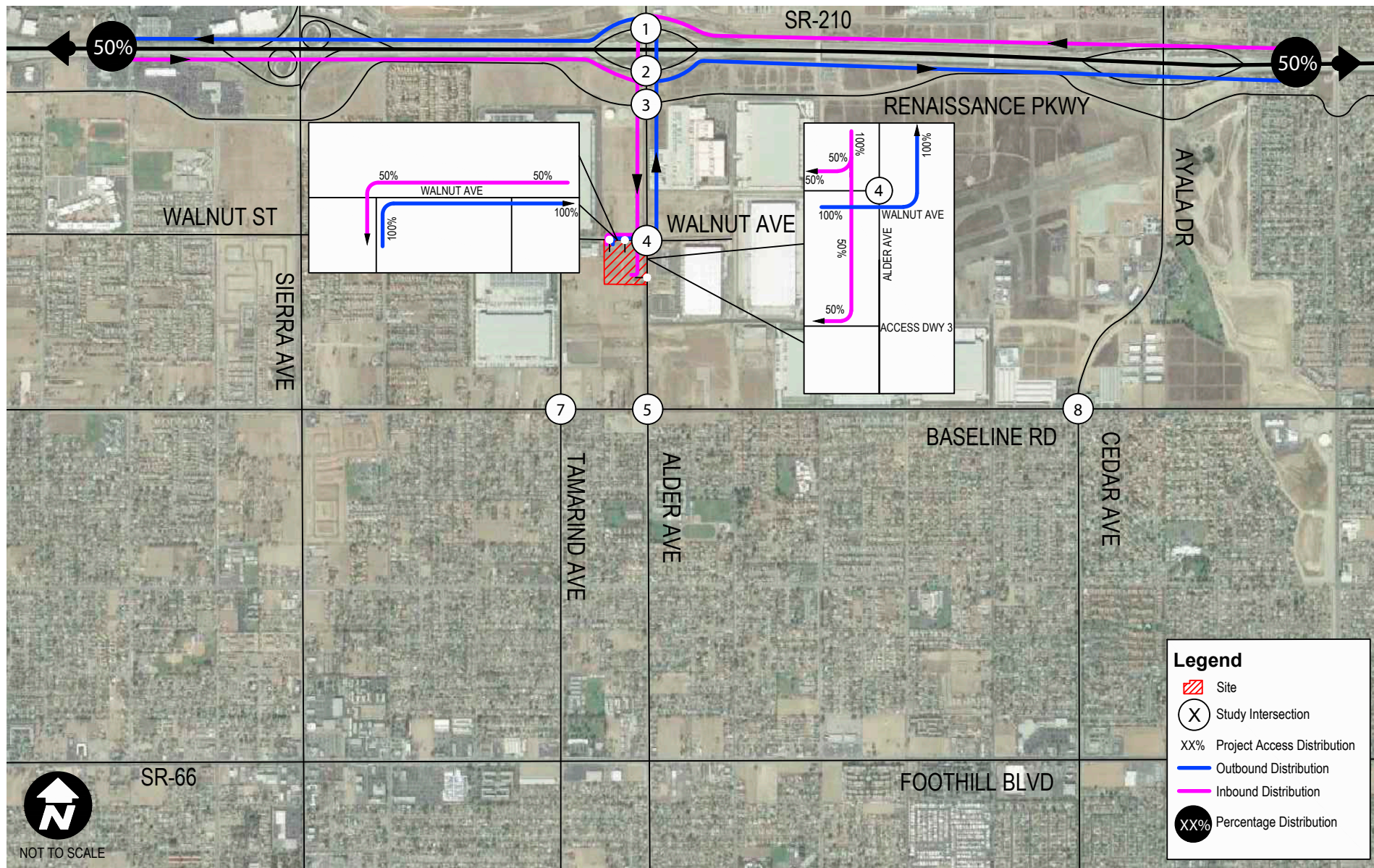
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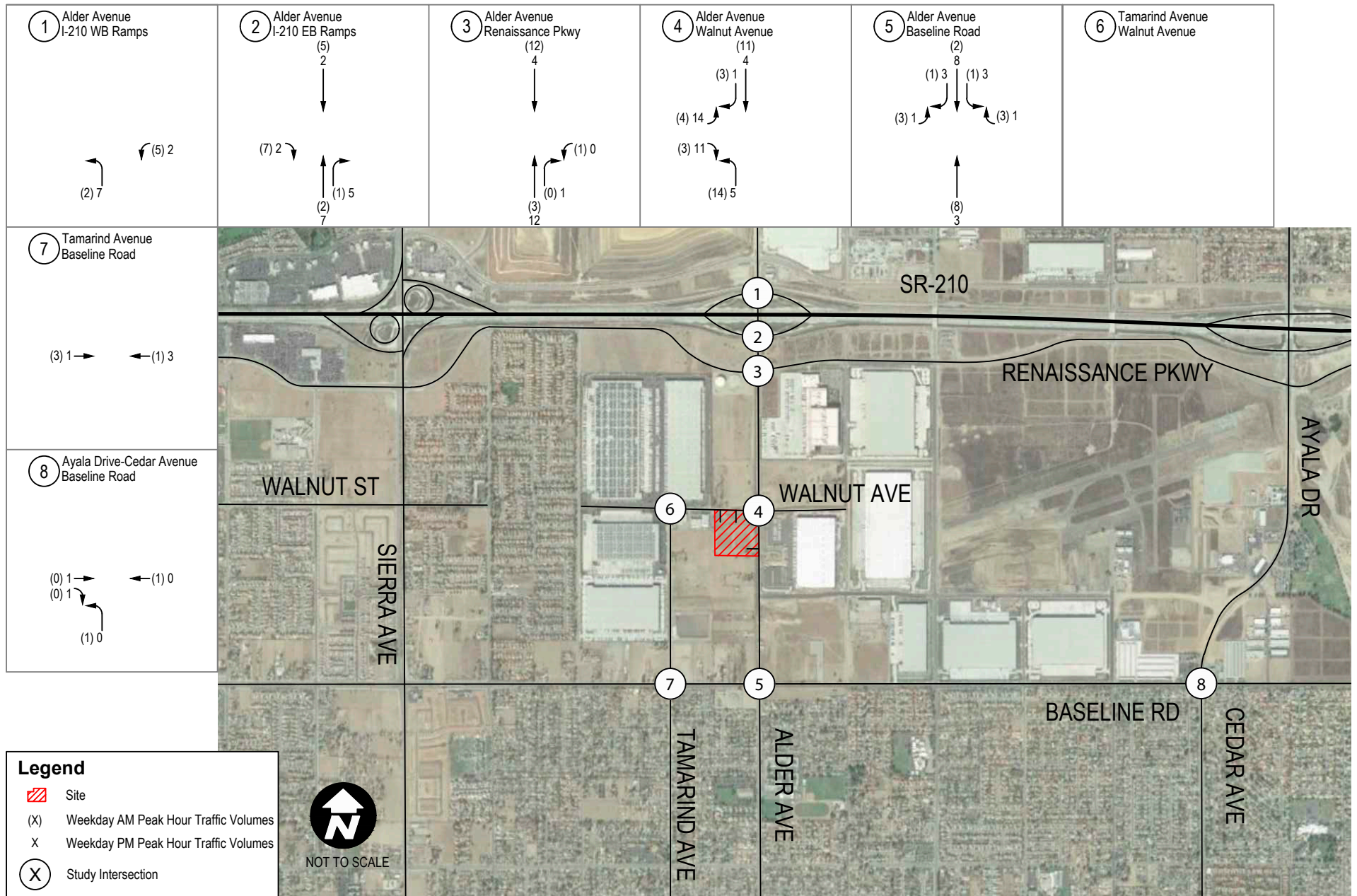
SOURCE: Google Earth 2016

FIGURE 9

Project Trip Distribution - Trucks

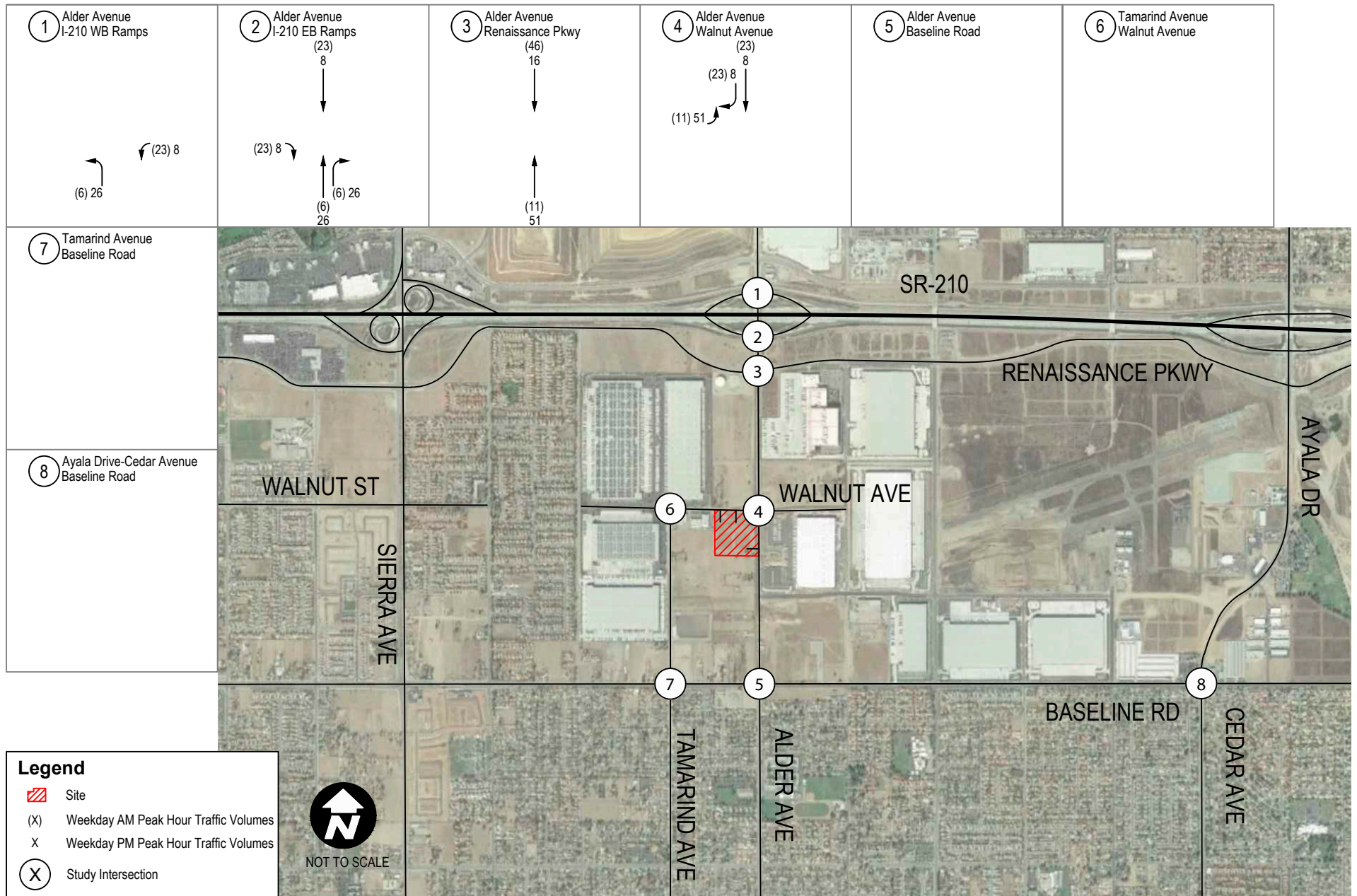
Walnut/Alder Warehouse Project

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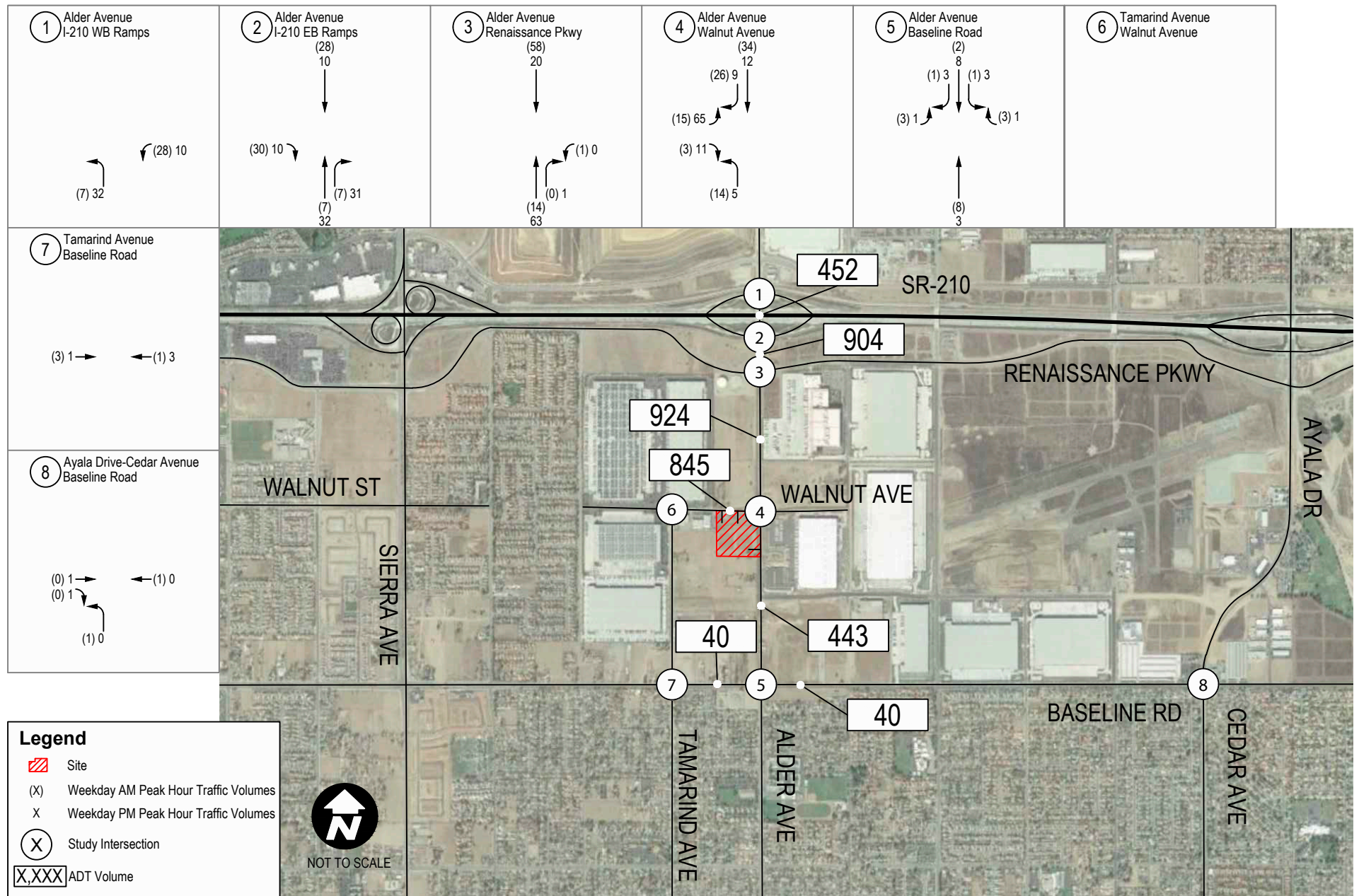
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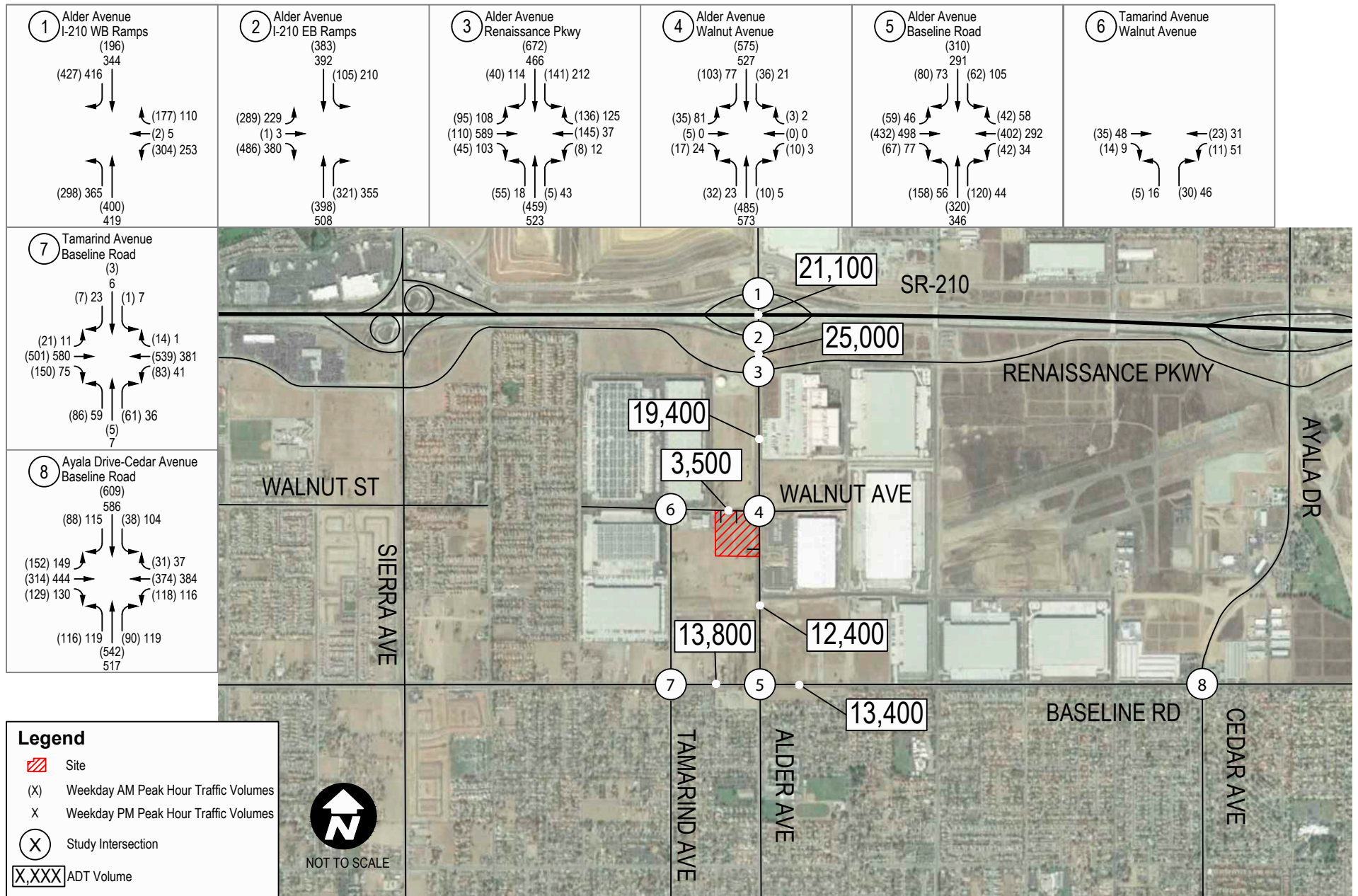
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SOURCE: Google Earth 2016

FIGURE 12
Project Trip Assignment - Passenger Cars and Trucks (PCE-Adjusted)

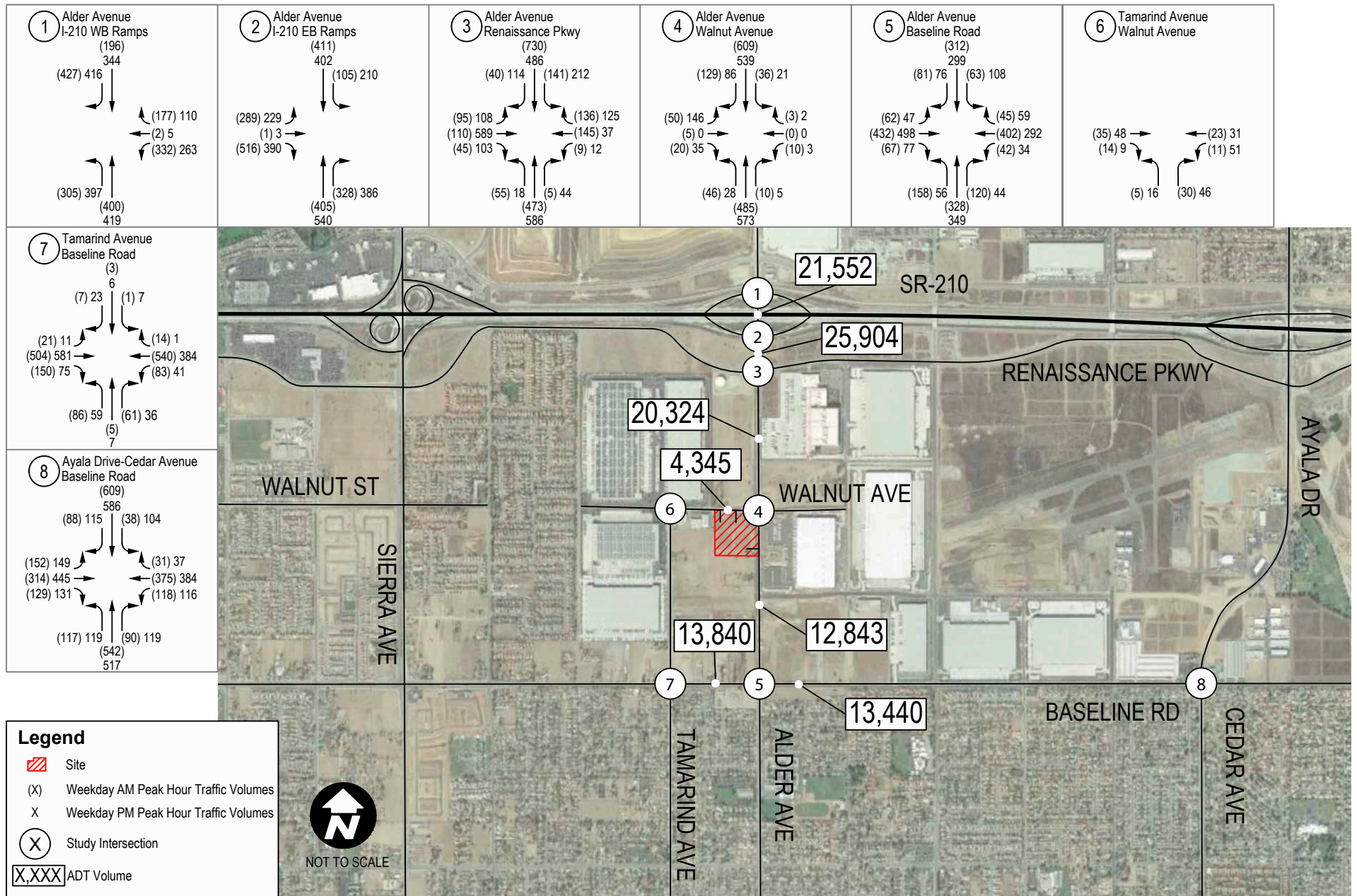
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SOURCE: Google Earth 2016

FIGURE 13
Project Completion 2020 Baseline Traffic Volumes

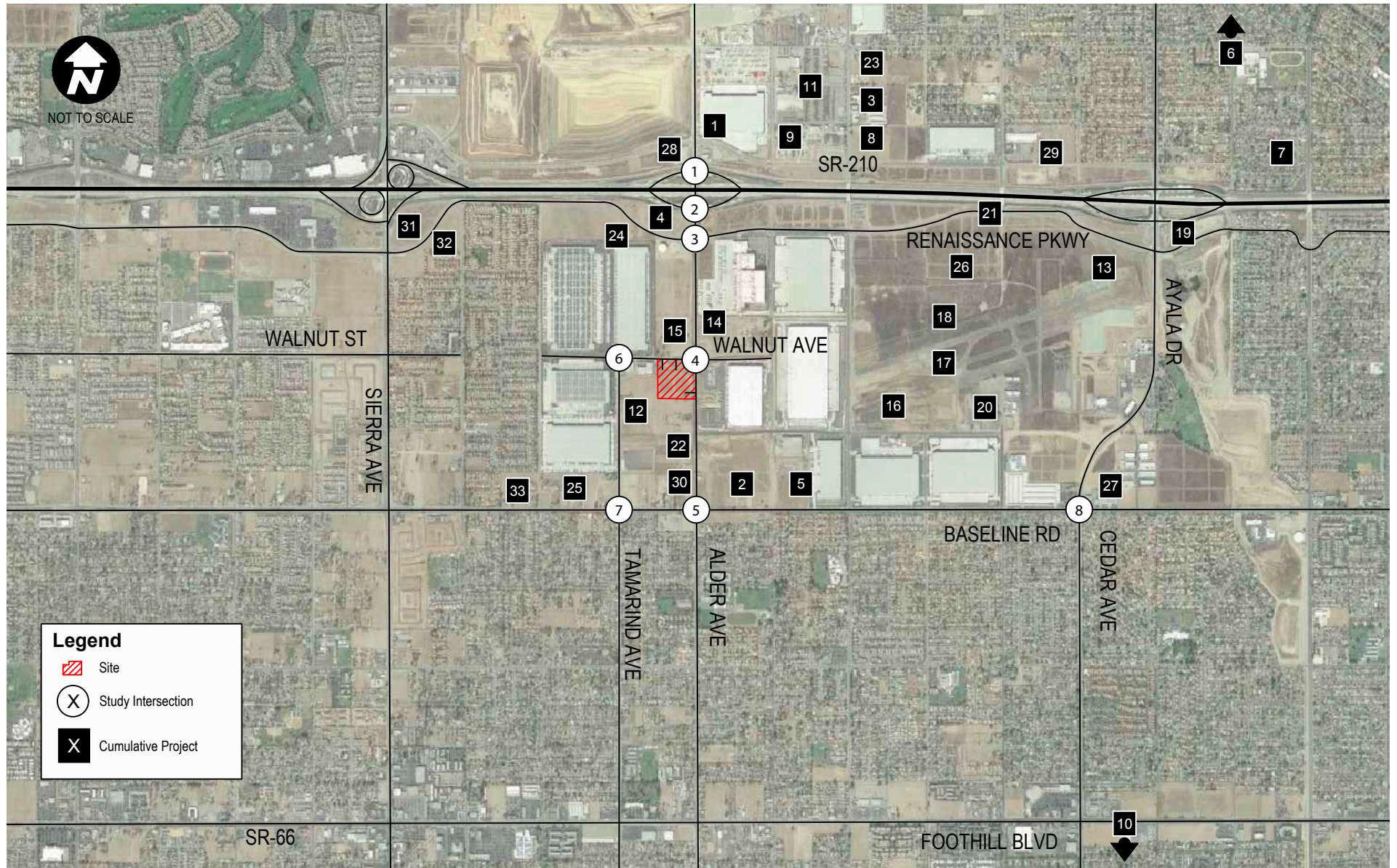
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SOURCE: Google Earth 2016

FIGURE 14
Project Completion Plus Project Traffic Volumes

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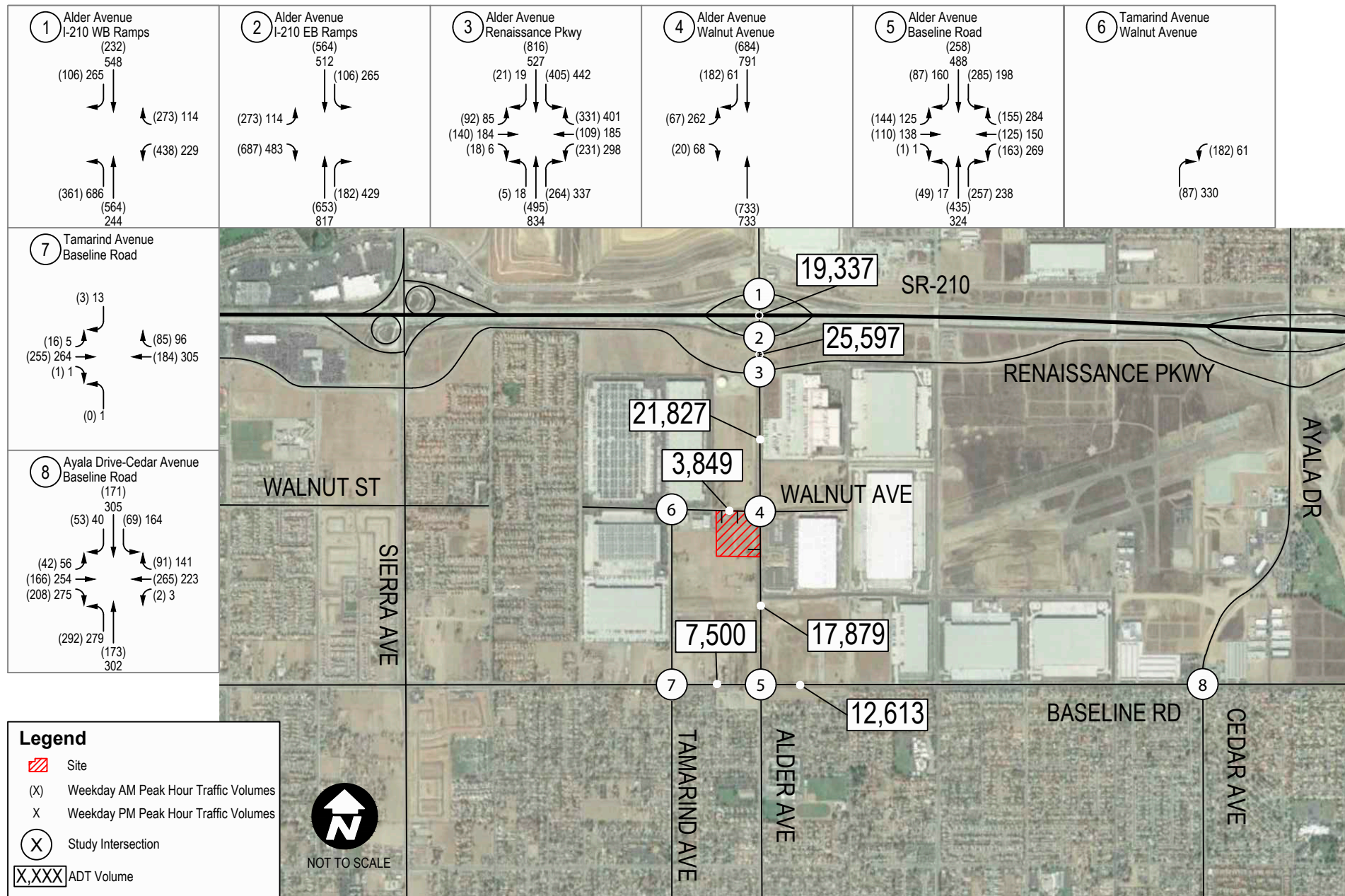


SOURCE: Google Earth 2016

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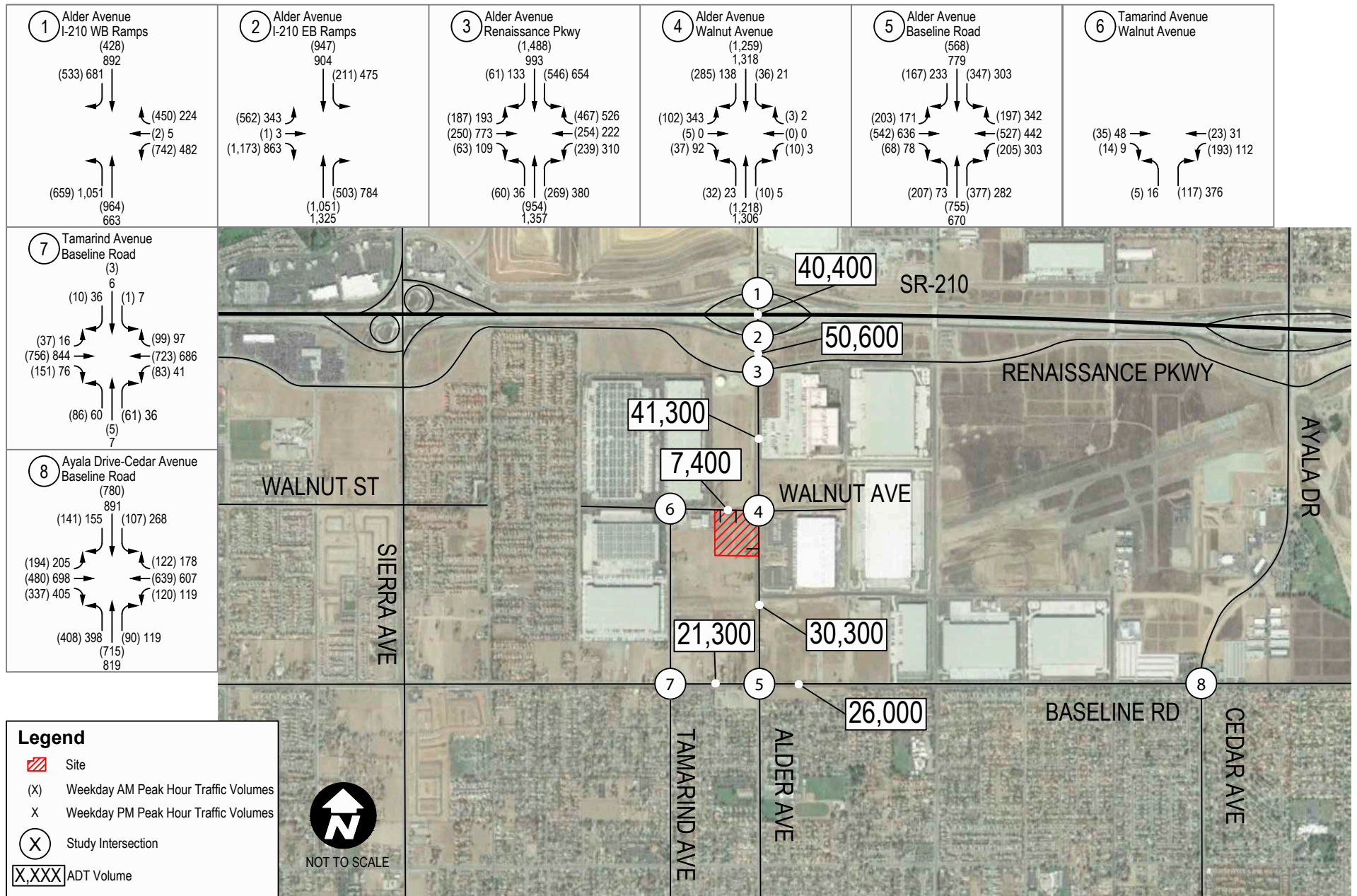
FIGURE 15
Locations of Cumulative Projects
Walnut/Alder Warehouse Project

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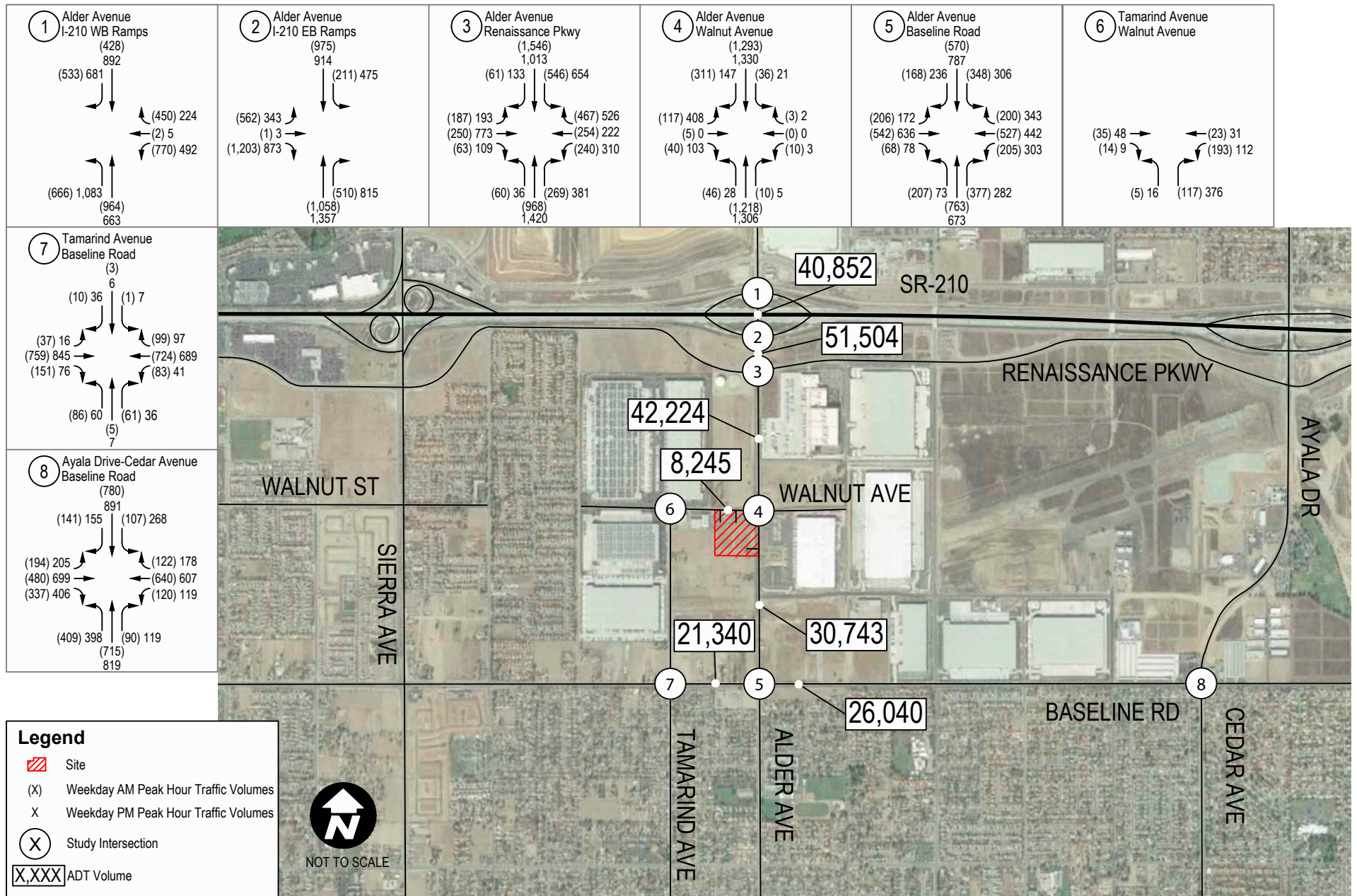
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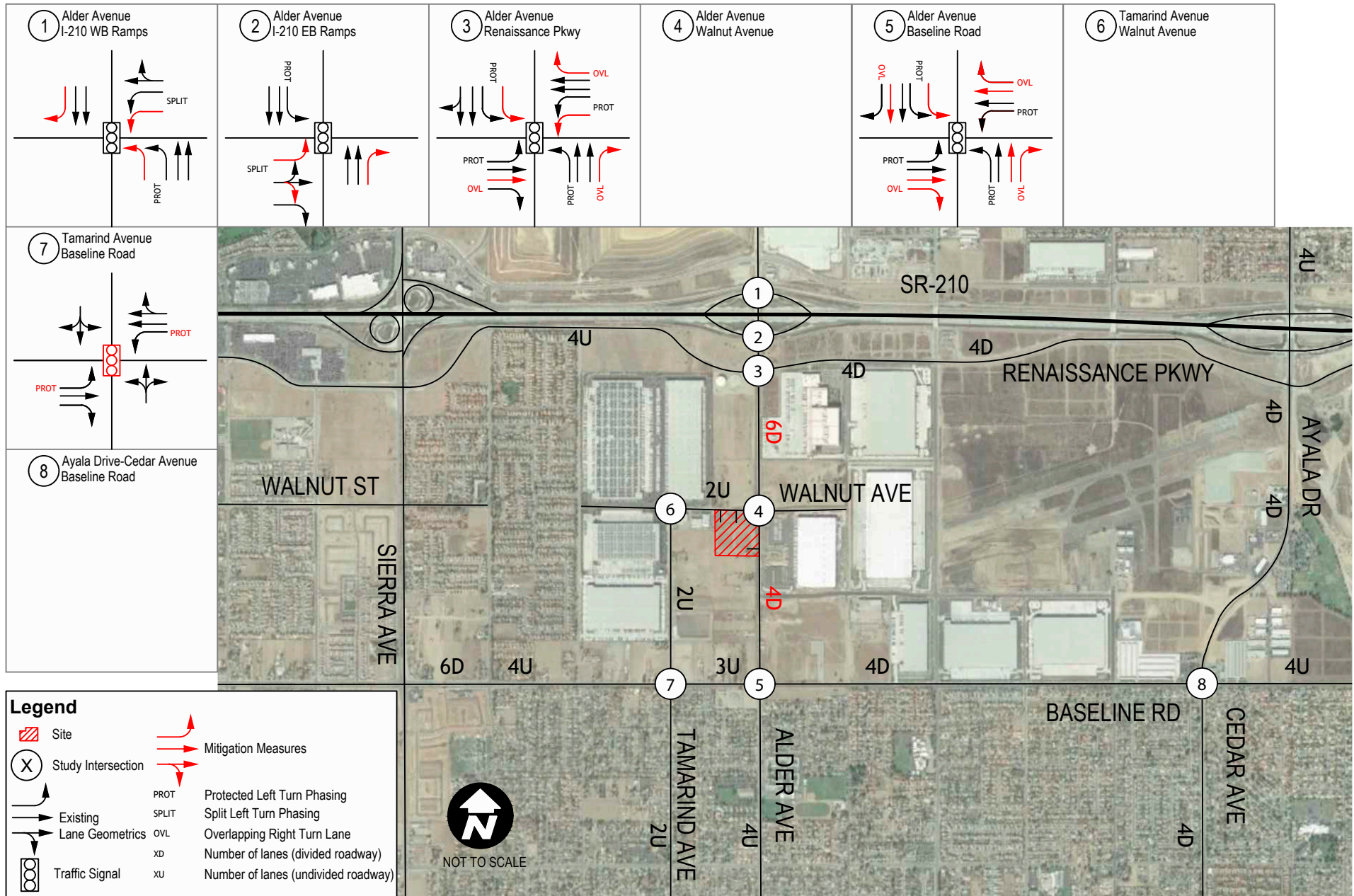
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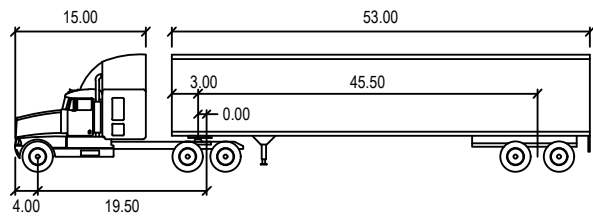
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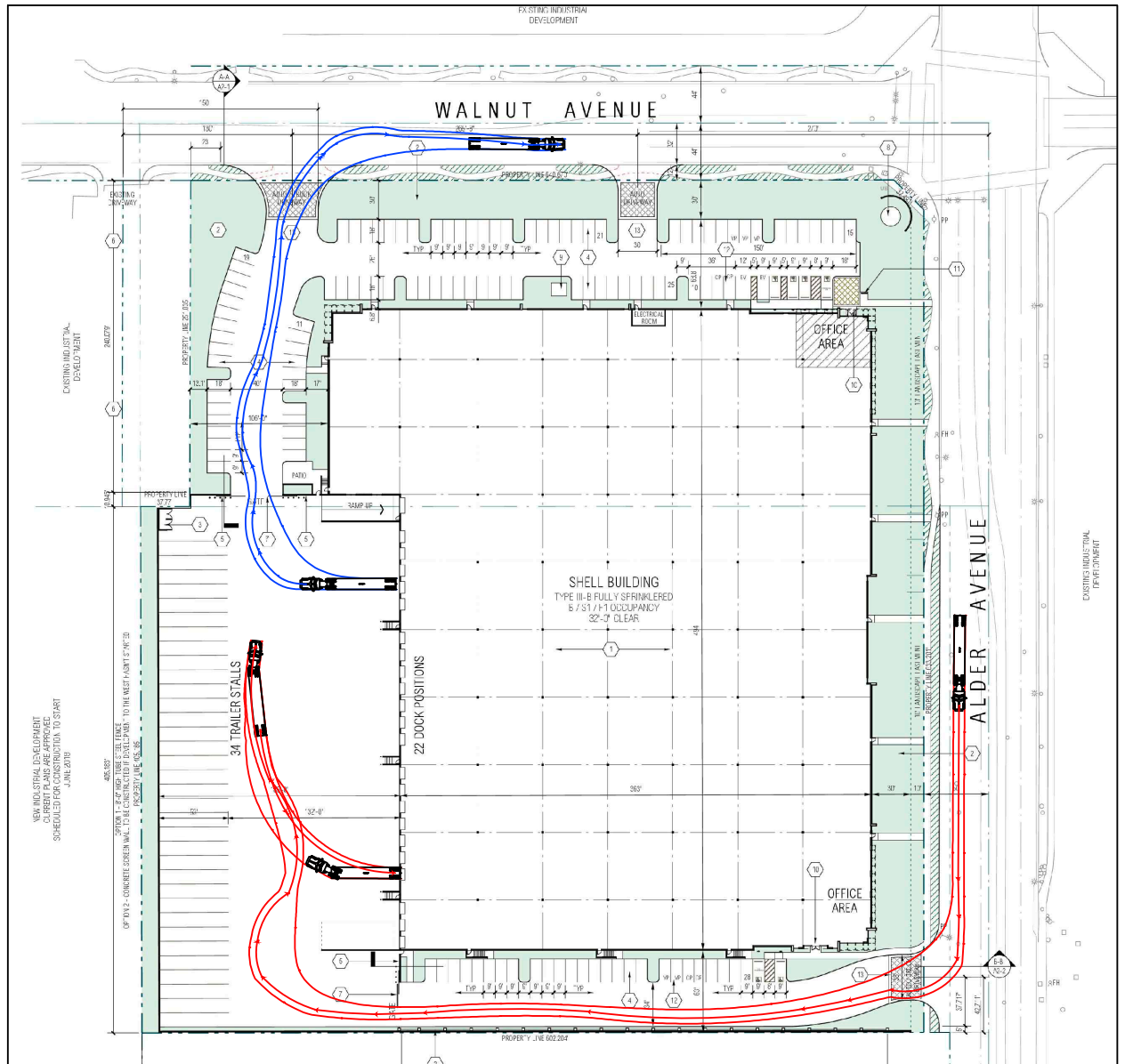
	feet		
Tractor Width	: 8.00	Lock to Lock Time	: 6.0
Trailer Width	: 8.50	Steering Angle	: 28.4
Tractor Track	: 8.00	Articulating Angle	: 35.0
Trailer Track	: 8.50		

Legend

- Outbound
- Inbound



NOT TO SCALE



SOURCE: Google Earth 2016

DUDEK

FIGURE 21

Outbound and Inbound Truck Turning Radii at Project Access Driveways (Walnut Avenue and Alder Avenue)

Walnut/Alder Warehouse Project

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