Public Review Draft
Norton Science and Language Academy
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

General Plan Amendment 19-01
Development Code Amendment 19-05
Subdivision 19-03 (Tentative Parcel Map 20120)
Conditional Use Permit 19-10

November 2019

Lead Agency:

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1.0 INTRODUCTION

1.1 Project Overview

This Initial Study/Mitigated Negative Declaration (IS/MND) was prepared by Kimley-Horn and Associates (Kimley-Horn) for the City of San Bernardino (City) to assess whether there may be significant environmental impacts associated with the proposed Norton Science and Language Academy (NSLA) Project ("Project or proposed Project") located on the northwest corner of the intersection of Waterman Avenue and Valley Street, in the City of San Bernardino, California. This MND was prepared consistent with the requirements of the California Environmental Quality Act (CEQA) on the basis that there was no substantial evidence that there may be significant environmental impacts on specific environmental areas. Where a potentially significant impact may occur, the most appropriate mitigation measure(s) have been identified and would avoid or mitigate the potential impact to a level of less than significant.

1.2 Lead Agency

The lead agency is the public agency with primary responsibility for a proposed project. Where two or more public agencies will be involved with a project, CEQA Guidelines §15051 establishes criteria for identifying the lead agency. In accordance with CEQA Guidelines §15051(b) (1), "the lead agency will normally be the agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose." Pursuant to State CEQA Guidelines section 15367 and based on the criterion above, the City of San Bernardino is the lead agency for the proposed NSLA Project.

1.3 Purpose and Scope of the Initial Study

In accordance with CEQA (California Public Resources Code [PRC] §21000 et seq.) and its Guidelines (California Code of Regulations [CCR], Title 14, §15000 et seq.), this IS/MND has been prepared to evaluate the potential environmental effects associated with the construction and operation of the Project.

Per State CEQA Guidelines, section 15070, a public agency shall prepare or have prepared a proposed negative declaration or MND for a project subject to CEQA when:

a) The initial study shows no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or

b) The initial study identifies potentially significant effects, but:

    1) Revisions in the project plans or proposals made by, or agreed to by the applicant before the proposed mitigated negative declaration and initial study are released for

public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and

2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

1.4 Impact Terminology

The following terms are used to describe the level of significance of impacts:

- A finding of no impact is used if the analysis concludes that a project would not affect the particular topic area in any way.
- An impact is considered less than significant if the analysis concludes that a project would cause no substantial adverse change to the environment and requires no mitigation.
- An impact is considered less than significant with mitigation incorporated if the analysis concludes that a project would cause no substantial adverse change to the environment provided that environmental commitments or other enforceable measures are included as part of the Proposed Project and agreed to by the applicant.
- An impact is considered potentially significant if the analysis concludes that a project could have a substantial adverse effect on the environment.

1.5 Mitigation Measures

Per State CEQA Guidelines, section 15041, Authority to Mitigate, a lead agency for a project has authority to require feasible changes in any or all activities involved in the project in order to substantially lessen or avoid significant effects on the environment, consistent with applicable constitutional requirements such as the "nexus" and "rough proportionality" standards. As defined by State CEQA Guidelines, section 15364, "feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal social, and technological factors. If significant impacts are identified, then mitigation measures are adopted to reduce the impact to less than significant levels. State CEQA Guidelines, section 15126.4 states that mitigation measures must be consistent with all applicable constitutional requirements, including the following:

- There must be an essential nexus (i.e., connection) between the mitigation measure and legitimate governmental interest.
- The mitigation measure must be "roughly proportional" to the impacts of the project.

There are several forms of mitigation under CEQA (see State CEQA Guidelines, § 15370). These are summarized below.

- **Avoiding** the impact altogether by not taking a certain action or parts of an action.
- **Minimizing** impacts by limiting the degree or magnitude of the action and its implementation.
- **Rectifying** the impact by repairing, rehabilitating, or restoring the impacted environment.
- **Reducing** or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- **Compensating** for the impact by replacing or providing substitute resources or environment.

Avoiding impacts is the preferred form of mitigation, followed by minimizing and rectifying the impact to less than significant levels. Compensating for impacts would be used only when the other mitigation measures are not feasible.

1.6 Environmental Resource Topics

This IS/MND evaluates the proposed Project's impacts on the following resource topics:

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

1.7 Document Organization

The purpose of this IS, is to evaluate the potential environmental impacts of the proposed Project. This document is divided into the following sections:

Section 1.0. Introduction – This section includes an introduction and describes the purpose and organization of the document.

Section 2.0. Project Information – This section describes the proposed Project in detail. It also identifies any other public agencies whose review, approval, and/or permits may be required.

Section 3.0. Environmental Checklist – This section describes the environmental setting and overview for each of the environmental resource topics. It evaluates a range of impacts classified as "no impact," "less than significant impact," "less than significant impact with mitigation incorporated," and "potentially significant impact" in response to the CEQA Appendix G: Environmental Checklist Form (Environmental Checklist).

1.8 Required Permits and Approvals

The following permits, agreements, and regulatory review processes must be approved by the City before any construction or operation of the Project, as proposed, is permitted:

- General Plan Amendment 19-01
- Development Code Amendment 19-05
- Subdivision 19-03 (Tentative Parcel Map 20120)
- Conditional Use Permit (CUP) 19-10[1]

Other permits required for the Project may include but are not limited to the following: issuance of encroachment permits for driveways, sidewalks, and connection to utilities; lighting; demolition permits; building permits; grading permits; tenant improvement permits; and permits for new utility connections.

Additional Agencies Required for Project Approvals:

- State of California Department of Social Services

1.9 Summary of Findings

Section 4.0 of this document contains the Environmental Checklist that was prepared for the proposed Project pursuant to Appendix G of the State CEQA Guidelines. The Environmental Checklist indicates that the proposed Project would not result in significant impacts with the

[1] As discussed in detail in the Project Description, two separate educational facilities are proposed as part of the Project. The smaller facility, the San Bernardino County Head Start/Preschool facility, is not subject to a CUP, as it is part of the San Bernardino County Public School District (SBCPSD), an independent public agency. Construction and operation of the Head Start/Preschool will also require approval by the County of San Bernardino, as a Responsible Agency under CEQA.

implementation of mitigation measures, as identified where applicable throughout this document.

1.10 Initial Study Review Process

The IS and a Notice of Intent (NOI) to adopt an MND will be distributed to responsible and trustee agencies, other affected agencies, the California Office of Planning and Research State Clearinghouse, and other parties for a 30-day public review period.

Written comments regarding this MND should be addressed to:

Travis Martin, Associate Planner
Community & Economic Development Department
City of San Bernardino
201 North E Street, 3rd Floor
San Bernardino, CA 92401
909-384-5313 and martin_tr@sbcity.org

After the 30-day review period, comments submitted to the City during the public review period will be considered and addressed prior to adoption of the MND by the City.

1.11 Project Applicant(s)/Sponsor(s)

Project Applicant:

Lewis Center for Educational Research
17500 Mana Road
Apple Valley, CA 92307
Contact: Lisa Lamb
(760) 946-5416

Project Partner:

County of San Bernardino - Preschool Services Department
662 S. Tippecanoe Avenue
San Bernardino, CA 92415
Contact: Phalos Haire
(909) 383-2044

Property Owner(s):

County of San Bernardino - Preschool Services Department
662 S. Tippecanoe Avenue
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201 North E Street, 3rd Floor
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2.0 PROJECT INFORMATION

2.1 Proposed Project Overview and Background

The Lewis Center for Education Research (LCER) currently operates the NSLA, serving approximately 800 children grades Kindergarten through 8, in a facility located at 503 East Central Avenue, San Bernardino, CA 92408. This is a shared facility with the County of San Bernardino, which also operates the Mill Child Development Center (Head Start/Preschool facility) at the same location, offering services to approximately 120 children in Transitional Kindergarten (TK). Due to existing site constraints, the LCER is unable to expand the NSLA campus at its existing location. Therefore, the LCER proposes to acquire property to relocate, develop and operate an expanded NSLA campus in the proposed Project location (northwest corner of the intersection of Waterman Avenue and Valley Street). The new NSLA facility would accommodate approximately 1,500 students, including high school students, at buildout; that is, approximately 700 more students than at its current location. The Head Start/Preschool program is also proposed to move to the new site, and would serve approximately 220 TK students, or approximately 100 more students than at the existing location. The total anticipated number of students to be served at the new site from both the NSLA facility and the Headstart/Preschool facility would be approximately 1,720 at buildout. Together, the County's Head Start/Preschool and the NSLA facilities comprise the proposed Project. Specific Project details are provided in Section 2.0, Description of the Proposed Project. The proposed site is approximately 18 gross acres, located at the northwest corner of the intersection of Waterman Avenue and Valley Street, in the City of San Bernardino.

Norton Science and Language Academy

The LCER is a 501(c)(3) nonprofit organization that provides access to facilities, instruments and educators in a variety of hands-on instructional programs – with a special emphasis on science – for elementary, middle and high school children throughout San Bernardino County.

In 1997, the LCER opened the Academy for Academic Excellence (AAE) with 220 students. The AAE is an independent, direct-funded charter school, authorized by Apple Valley Unified School District (USD) and is fully accredited by the Western Association of Schools and Colleges (WASC). The AAE now offers full-time programs for approximately 1,450 students in grades TK through 12.

In 2008, the LCER opened its second facility, the NSLA, located at 503 East Central Avenue in San Bernardino with 220 students in grades K through 2, and shared school facilities with the Mill Child Development Center. Since its inception, the NSLA has grown to serve approximately 800 students in grades Kindergarten through 8 and plans to expand to provide high school services through the proposed relocation. NSLA is a dual immersion program that integrates

language minority students (English learners) and language majority students (English speakers) to develop their bilingualism and biliteracy in English and Spanish.

The LCER also operates the Goldstone Apple Valley Radio Telescope (GAVRT) Radio Astronomy Program in partnership with National Aeronautics and Space Administration (NASA)/Jet Propulsion Laboratory (JPL). Programs are offered in Astronomy, Aviation/Aeronautics, NASA's Beginning Engineering, Science and Technology (BEST), California Gold Rush, and Trails West.

San Bernardino County - Head Start/Preschool Facility (Mill Child Development Center)

The San Bernardino County - Preschool Services Department (SBCPSD) administers the Federal Head Start (FHS), Early Head Start (EHS), Early Head Start-Child Care Partnership (EHS-CCP), and California State Preschool Program (CSPP) and will administer services at the proposed Project's head start/preschool facility. Since 1965, the SBCPSD has provided comprehensive services to children ages zero to five from low-income families. The SBCPSD served over 6,079 disadvantaged children ages zero to five and their families at 41 preschool sites and 33 private Family Child Care providers countywide in program year 2017-2018.[2]

Since 1993, SBCPSD has operated the Mill Child Development Center located at 503 East Central Avenue in the City of San Bernardino. At this location, SBCPSD administers the Head Start and California State Preschool programs, serving the County's lowest-income families and their children. However, SBCPSD believes that relocation of the Mill Child Development Center to the proposed Project site will increase access to the facility.

2.2 Regional Location

The City is located approximately 60 miles east of the City of Los Angeles in the upper Santa Ana River Valley. The valley is framed by the San Bernardino Mountains on the northeast and east, the Blue Mountains and Box Springs Mountains abutting the cities of Loma Linda and Redlands to the south, and the San Gabriel Mountains and the Jurupa Hills to the northwest and southwest, respectively. The City of San Bernardino is surrounded by the cities of Rialto to the west, Colton to the southwest, Loma Linda to the south, Redlands to the southeast, Highland to the east, and the San Bernardino National Forest to the north; refer to **Exhibit 1**, *Regional Location*.

2.3 Project Site

The Project site is comprised of sixteen parcels; refer to **Table 1**, *Project Site Assessor's Parcel Numbers*. The proposed Project is in the southcentral portion of the City, and located on the northwest corner of the intersection of Waterman Avenue and Valley Street. More specifically, the Project site is bounded by H. Frank Dominguez Elementary School on the north, Waterman

[2] San Bernardino County. ND. *Preschool Services Annual Report, 2017-2018*. Retrieved from San Bernardino County Website: http://hs.sbcounty.gov/psd/Content%20Documents/2017-2018%20Annual%20Report.pdf. Accessed September 12, 2019.

Avenue on the east, Valley Street on the south, and Allen Street to the west; refer to **Exhibit 2**, *Local Vicinity Map*. Local access to the Project site is provided via Waterman Avenue, Valley Street, and Allen Street. Regional Access is provided via Interstate 215 (I-215) at Inland Center Drive, Mill Street and 2nd Street, and Interstate 10 (I-10) at Waterman Avenue.

Table 1: Project Site Assessor's Parcel Numbers

Parcels			
0136-261-11[R]	0136-261-26[I]	0136-261-36[R]	0136-261-43[R]
0136-261-23[I]	0136-261-27[I]	0136-261-37[R]	0136-261-44[R]
0136-261-24[I]	0136-261-28[I]	0136-261-41[R]	0136-261-50[R]
0136-261-25[I]	0136-261-29[I]	0136-261-42[R]	0136-261-57[I]
Note: [I] Parcel designated: Zoning (Office Industrial Park) and General Plan Land Use (Industrial) = 8 parcels [R] Parcel designated: Zoning (Residential Suburban) and General Plan Land Use (Single Family Residential) = 8 parcels			

Refer to **Exhibit 3**, *Aerial View*, to view the location of all associated parcels, **Exhibit 4**, *Project Site Assessor Parcel Numbers*, and **Appendix H**, *ALTA/NSPS Land Survey Records* for the land title survey.

2.4 General Plan and Zoning Designations

Zoning is the primary mechanism for implementing the General Plan. It provides detailed regulations pertaining to permitted and conditional uses, site development standards, and performance criteria to implement the goals and policies of the General Plan. San Bernardino's Development Code (Title 19 of the San Bernardino Municipal Code [MC]) was adopted in May 1991 and has been periodically revised since that time. In particular, the Land Use Element of the City's General Plan establishes the primary basis for consistency with the City's Development Code. The City's Zoning Map corresponds with the General Plan designations[3].

The Project site is vacant and areas to the north, south, east and west are fully developed with residential, educational, commercial, and industrial uses. Some vacant parcels also exist north of the Project site. Meadowbrook Park is located just northwest of the Project site; refer to **Table 2**, *Existing General Plan Land Use and Zoning Designations,* for official area designations. The Project site is in a non-sectioned portion of Township 1 South, Range 4 West, San Bernardino Baseline and Meridian. The site is depicted on the United States Geological Survey (USGS) 7.5-minute topographic quadrangle for San Bernardino South, California (1980).[4]

[3] City of San Bernardino. 2005. *General Plan*. Retrieved from City of San Bernardino Website: http://www.sbcity.org/civicax/filebank/blobdload.aspx?blobid=26199, page 2-2. Accessed September 12, 2019.

[4] BCR Consulting. 2019. *Cultural Resources Assessment*. Refer to Appendix B.

Table 2: Existing General Plan Land Use and Zoning Designations

Location	Existing Use	Existing General Plan Land Use Designation	Existing Zoning Designation
Project Site	Vacant and Disturbed Land	Single Family Residential and Industrial	(R-S) Residential Suburban and (OIP) Office Industrial Park
North	H. Frank Dominguez Elementary, Vacant Land	Single Family Residential and Industrial	(R-S) Residential Suburban and (OIP) Office Industrial Park
South	United Rentals; Commercial Use	Commercial	Commercial Heavy
East	Warehouse; Industrial Use	Industrial	Industrial Light (IL)
West	Single-Family Residential	Single Family Residential	(R-S) Residential Suburban

Note: The Project site contains 16 parcels with two land use and zoning designations , as shown on Table1, Project Site Assessor's Parcel Numbers; also refer to Exhibit 4, Project Site Assessor Parcel Numbers.
Source: City of San Bernardino. 2019. *Public Zoning Map.* Available at http://sbcity.maps.arcgis.com/apps/webappviewer/index.html?id=dcca6aa4816b4021bd9364888ba669fd, accessed on September 12, 2019.

As shown in **Table 1**, *Project Site Assessor's Parcel Numbers*, the Project site currently contains 16 parcels. As designated by the City's Zoning Code, eight of the parcels have a General Plan land use designation of "Industrial" and a Zoning designation of "Office Industrial Park (OIP)." The additional eight parcels have a General Plan land use designation of "Single-Family Residential" and a Zoning designating of "Residential Suburban (R-S)." The proposed Project is requesting a General Plan Amendment (GPA) and Zone Change (ZC). The existing "Single-Family Residential and Industrial" General Plan designations are proposed to be amended to "Public/Quasi-Public." Similarly, the existing "Residential Suburban and Office Industrial Park" zoning designations are proposed to be amended to "Public Facility"; refer to **Exhibit 5**, *Existing General Plan Land Use Designation,* **Exhibit 6***, Proposed General Plan Land Use Designation,* **Exhibit 7**, *Existing Zoning Designation,* and **Exhibit 8**, *Proposed Zoning Designation*.

2.5 Existing Conditions

The total Project area encompasses approximately 18 acres of vacant and disturbed land. The site has been subject to severe disturbances related to grading and demolition of former residential developments.[5] The site is generally covered by low-growing annual grasses, scrub-type plants, and four trees along the western property line. The elevation of the Project site ranges from approximately 1018 to 1027 feet above mean sea level (AMSL).

Signs of previous disturbance from grading and weed abatement activity are common throughout the site; no indications of current farming or other land use are evident. Additionally, the site is not located within an active fault zone or an Alquist-Priolo Earthquake Fault Zone, nor

[5] BCR Consulting. 2019. *Cultural Resources Assessment*. Refer to Appendix B.

is it located within a landslide or liquefaction prone area.[6] The site geology is made up of mostly alluvium, lake, playa, and terrace deposits; unconsolidated and semi-consolidated soils.[7] An existing United Rentals and a light industrial shop located on the southwest corner are not part of the Project site.

2.6 Proposed Project Characteristics

The Project site comprises 16 parcels on approximately 18 acres. However, the proposed Project includes a Tentative Parcel Map (TPM) to consolidate the existing sixteen parcels into three parcels; refer to **Table 3**, *Project Site Breakdown.* Parcel 1 would be the 2.20-acre site for the Head Start/Preschool facility site, Parcel 2 would be approximately 0.20 acres for sidewalk Right-of-Way (ROW) Dedication, and Parcel 3 would be the 15.66-acre NSLA facilities site (elementary, middle, and high schools and associated amenities).[8] The Head Start/Preschool facility and the NSLA facilities, together, constitute the "proposed Project."

Table 3: Project Site Breakdown

Parcel	Area in Acres (AC)
Head Start/Preschool Facility *(Parcel 1)*	2.20
Sidewalk (ROW) dedications *(Parcel 2)*	0.20
NSLA Facilities *(Parcel 3)*	15.66
Total Project Area	**18.06 AC**
Source: Kimley-Horn. June 30, 2019. Conditional Use Permit Map. AC = Acres	

NSLA Facilities (Kindergarten, Elementary, Middle, and High School)

The NSLA facilities would constitute approximately 15.66 acres and be located at the eastern portion of the Project site (Parcel 3). The facilities would include approximately 316 parking stalls that would be dispersed throughout the north, south, and east portions of the NSLA campus. Other amenities include indoor and outdoor security lighting, soccer/track and field facility lighting, outdoor speakers, seating areas, perimeter fencing and frontage improvements.

The soccer/track and field would be provided on the western half of the Project site, just south of the Head Start/Preschool facility, along Allen Street. Two full-size outdoor basketball courts would be provided just southeast of the soccer field; refer to **Exhibit 9**, *Site Plan*.

[6] Department of Conservation (DOC). 2019. *Fault Activity Map of California*. Available at https://maps.conservation.ca.gov/cgs/DataViewer/, accessed on April 2019.
[7] DOC. 2019. *Geology Map of California*. Available at https://maps.conservation.ca.gov/cgs/DataViewer/, accessed on April 2019.
[8] Kimley-Horn. May 2019. *Tentative Parcel Map No. 20120*.

Head Start/Preschool

The Head Start/Preschool facility site would constitute approximately 2.20 acres and be located at the northwest corner of the Project site (Parcel 1). It would include an approximately 17,179 square foot single-story building designed to accommodate approximately 220 students. The facility would include approximately 14,465 square feet of outdoor play area, along with 110 parking stalls distributed throughout the north, south, and east areas of the site as shown in Figure x. Ingress and egress to the facility would be via one driveway, located south of the building footprint, along Allen Street (Driveway 1). The Head Start/Preschool facility would be physically separated from the LCER facilities by a fence. No direct connection would be available between the Head Start/Preschool facility or the NSLA facilities.

2.7 Facility Operations

Operation of NSLA Facilities (Kindergarten, Elementary, Middle, and High School)

The operations of the NSLA facilities would consist of the following:[9]

- Approximately 120 staff would provide services at NSLA when full enrollment is met in the 2014-2025 school year.
- Kindergarten through grade 5 will start at 8:15 AM. Kindergarten will release students at 1:30 PM. Grades 1 through 5 will release at 2:45 PM, except on Wednesdays when the release time will be 1:35 PM.
- Middle/ High School (grades 6 – 12): 7:46 AM - 2:45 PM (Early Release is every Wednesday at 1:35 PM).
- Approximately 40 – 60 student drivers can be anticipated in future school years.
- NSLA will have Character Development Officers (CDO's) supporting traffic control.
- A bus turnout is proposed on the corner of Waterman Avenue and Valley Street. The bus turnout would allow for a direct connection for students and staff using public transportation.

All students would be permitted on campus starting at 7:15 AM for breakfast. The adjacent H. Frank Dominguez Elementary School hours are 8:50 AM - 3:30 PM.

Parent meetings are anticipated to occur once per month on a weekday (evenings) or weekend (morning and/or evening). It is anticipated that up to 100 students could remain on campus for

[9] Lewis Center for Educational Research. October 3, 2019. *Communication with David Gruber, Director of Finance, via email.*

afterschool programs up until 6:00 PM each day. Additionally, athletic events/practices are anticipated to take place and could draw as many as 40 to 50 students at any one time for games and practices, generally in the evenings.

Generally, Kindergarten through middle school children would be hosted on the northern half of the site in buildings A, B, and H. Kindergarten children would have a dedicated outdoor play area just outside of building B, while children between first through fifth grade would also have a dedicated outdoor quad-play area just south of building A and north of building H.

High school students would be in buildings E, located on the southeast portion of the site. The high school science courses, such as chemistry and biology, will occur in building F, the media/science building. The high school buildings are strategically located contiguous to the southeasternmost parking area which would serve student drivers by providing ease of access to campus. A high school outdoor quad/STEAM quad area would be provided west of buildings E and south of building F. The site has been master-planned to accommodate outdoor play areas that maintain kindergarten, elementary, and middle school children separate from high school students.

Operation of San Bernardino County Head Start/Preschool Facility

The new Head Start/Preschool facility would be located on the northwest corner of the Project site between the H. Frank Dominguez Elementary School and the NSLA facilities.

The Head Start/Preschool's one-story building is anticipated to be approximately 17,179 square feet and 14,564 square feet of outdoor play area is also proposed. The Head Start/Preschool would be serviced by approximately 42 staff persons. The typical hours of operation are 7:00 AM to 5:00 PM, with events/meetings occurring on a weekend or weekday evening, once per month.

The Head Start/Preschool facility would provide 110 vehicle parking spaces and site access would be via two driveways, Driveways 3 and 4, along Allen Street; refer to **Exhibit 10**, *Proposed Project Site Driveways*. On-site stacking for safe parent unloading/loading and bus drop-off area would also be available. Proximity to H. Frank Dominguez Elementary School is intended to minimize traffic if parents need to access both facilities.

NSLA Campus and Head Start/Preschool Classroom and Buildings Design[10]

The proposed Project includes new permanent school buildings composed of the Head Start/Preschool, TK, elementary, middle, high school facilities, and an indoor gym, along with

[10] The emissions model uses 2016 building code energy consumption rates. The project would be subject to the 2019 code. The adjustments are incorporated in the mitigation module of CalEEMod to meet current regulatory standards. As these are adjustments to be consistent with current code requirements, they are not mitigation or design features.

associated recreational amenities such as soccer/track and field and outdoor basketball courts, among other open recreational areas.

Classroom and building design features would include: high-efficiency wall assemblies and windows to reduce heating and cooling loads; Energy Star appliances; high-efficiency heating and cooling systems; high efficiency domestic hot water systems; and high-efficiency light-emitting diode (LED) lighting in educational units, common areas, and landscape design; refer to **Table 4**, *Proposed Project Structures and Other Components*. Additionally, refer to **Table 5,** *Proposed Project Detailed Summary,* for a summary of major Project details.

Table 4: Proposed Project Structures and Other Components

PARCEL 1			
Project Element	**Purpose/Grade**	**Stories**	**Area (SF)**
Building A	Grades 3 - 5	1 (Two Buildings)	11,589
Building B	Kindergarten	1	6,610
Building C	Admin	1	7,493
Building D	Multi-Purpose	1	10,380
Building E	Grades 6 – 12	2 (Two Buildings)	26,120
Building F	Media/Science Building	1	3,573
Building G	Gym	1	10,641
Building H	Grades 1 – 2	1 (Two Buildings)	13,484
Soccer/Track and Field	Recreational	-	-
Hardscaped Quad Areas/Kindergarten Play	Recreational	-	-
		NSLA Facilities	***89,890***
PARCEL 2			
Right-of-Way Dedication (sidewalk)			-
PARCEL 3			
Head Start/Preschool	TK	1	17,179
Play Area	Recreational	-	14,564
		Head Start/Preschool Facilities	***31,743***
		Project Total	**121,633**

Table 5: Proposed Project Detailed Summary

Project Element	Proposed Project
Existing General Plan Designation	Single-Family Residential and Industrial
Proposed General Plan Designation	Public / Quasi-Public
Existing Zoning Designation	Residential Suburban (R-S), Office Industrial Park (OIP)
Proposed Zoning Designation	Public Facility
Site Area	18.06 acres (786,616-square-feet)
Hours of Operation	Kindergarten hours from 8:15 AM to 1:30 PM Elementary School (grades 1 -5) from 8:15 AM to 2:45 PM. Middle/ High School – 7:46 AM – 2:45 PM. All students would be permitted on campus starting at 7:15 AM for breakfast. Early release for Elementary/Middle/High School students on Wednesdays at 1:35 PM.
Number of Staff/Employees	Approximately 162 Staff Members
Buildings Setbacks (from Property Line): North: South: East: West:	 63 feet 35 feet 94 feet 20 feet
Head Start Parking Spaces: Standard Stalls Accessible Stalls	 106 spaces 4 spaces
NSLA Parking Spaces: Standard Stalls Accessible Stalls	 308 spaces 8 spaces
Total Proposed Project Parking Spaces: Standard Stalls Accessible Stalls Total	 414 spaces 12 spaces 426 spaces
Construction Schedule: Construction Duration: Begin Construction: End Construction:	 13 Months March, 2020 (approximately) April, 2021 (approximately)
Grading Quantities: Cut: Fill: Net:	 19,704 Cubic Yards (CY) 19,704 CY 0 CY

Landscaping

The proposed Project would add new landscaping throughout the site. A Landscape Plan will require review and approval by the City prior to issuance of building permits, consistent with City standards.

Open Space/Recreation

The proposed Project would provide the following outdoor recreational amenities, as part of the NSLA portion of the proposed Project:

- A soccer/track and field;
- Two full-size outdoor basketball courts;
- A kindergarten only play area;
- Outdoor quad (grades 1 through 5);
- Science, Technology, Engineering, Art, Mathematics (STEAM) quad area;
- A high school/STEAM quad area;
- An indoor gym (building G); and
- Grassed areas throughout the Project site and between buildings.

The proposed Project would provide outdoor space for recreational purposes, as part of the Head Start portion of the proposed Project:

- Recreational outdoor play area

Refer to **Exhibit 9**, *Site Plan*, for the proposed Project site layout.

Stormwater and Utilities

An existing 18-inch inch sewer line traverses the northern portion of the site in an east-west direction. This sewer line would be protected in place, and used for the proposed Project. The elementary, middle and high school buildings would connect to the existing sewer line on the north portion of the site; the gym would connect to the sewer line on Waterman Avenue, and the head start/preschool facility would connect to the sewer line on Allen Street. Existing wastewater treatment facilities have capacity to serve the proposed Project. Expansion of existing facilities or construction of new wastewater treatment facilities would not be needed for implementation of the proposed Project.

All utility installation would be below ground in utility trenches. The following would be the utility providers:

- Sewer Service: San Bernardino Public Works Department
- Gas Service: Southern California Gas Company (SoCalGas)
- Phone Service: AT&T
- Water Service: San Bernardino Municipal Water Department (SBMWD)
- Electrical Service: Southern California Edison (SCE)
- Cable Service: Spectrum

An on-site infiltration/catch basin located on the southwest portion of the site, just south of the soccer/track and field, will capture and infiltrate the additional storm water runoff that is generated from the proposed development, conveying flows from north and southeast. Once the basin has reached capacity, an overflow device will be provided to allow flows to continue down

the existing drainage path, which is routed through the street. In summary, the site will not discharge more runoff than what is being discharged under the existing conditions.

Site Access

- Driveway 1 is a 64-foot-wide driveway and the main ingress and egress point to the NSLA campus. Driveway 1 is located on Valley Street approximately 640 feet east of Allen Street and approximately 320 feet west of Waterman Avenue. Driveway 1 would be a full-movement driveway for vehicles during the morning drop-off and afternoon pick-up periods.

- Driveway 2 is a 48-foot-wide driveway on Waterman Avenue, located approximately 990 feet north of Valley Street, and would be limited to right-out/egress from the Project site during school drop-off and pick-up periods. The driveway would otherwise provide full-movement for vehicles during non-pick-up/drop-off periods. Ingress via Driveway 2 would be blocked off during the morning drop-off and afternoon pick-up periods to minimize conflict with internal circulation.

- Driveway 3 is a 27-foot-wide full-movement access driveway for the Head Start/Preschool, located at the northwest corner of the Project site, along Allen Street. Driveway 3 will also provide ingress and egress to school busses for children drop-off and pick-up. Busses entering Driveway 3, would stop in front of the building entrance for pick-up or drop-off, busses would then move in a clockwise direction along the parking/driving aisles and exit the site from Driveway 4 out to Allen Street.

- Driveway 4 is a 26-foot-wide full-movement access driveway for the Head Start/Preschool, located at the northwest corner of the Project site, along Allen Street. Driveway 4 is the second driveway for the Head Start/Preschool facility. Driveway 4 will also provide ingress and egress to school busses for children drop-off and pick-up. Busses entering Driveway 4, would move in a counterclockwise direction around the site, until reaching the designated drop-off and pick-up area located on the northern portion of the building. Busses entering through Driveway 4 would then exit the site from Driveway 3.

- Driveway 5 is the 28-foot-wide southwestern most driveway on Allen Street, located approximately 750 feet north of Valley Street. Driveway 5 would allow all turning movements. This driveway is intended to provide full access for buses during sporting events and other activities. Driveway 5 would also be available for emergency vehicle access and/or evacuation. Otherwise, Driveway 5 would remain closed to the public.

Refer to **Exhibit 10**, *Proposed Project Site Driveways*, for driveway locations.

Internal Circulation

Internal circulation for the morning drop-off period would consist of vehicles entering the school site via the Valley Street driveway. Vehicles would then circulate in a clockwise direction around the main campus. Drop-off zones would be located just north of buildings A and B, and just east of buildings B, C, D, and E. After parents drop off their students, they may exit the site via the Valley Street driveway or the right-out only driveway on Waterman Avenue.

Pedestrian Access

The Project would provide sidewalks on the Project frontage to connect gaps in pedestrian facilities. The Project will also be providing a traffic signal at the intersection of Waterman Avenue at Valley Street which would improve pedestrian movement to and from the Project site. Crosswalks will be implemented as part of the traffic signal design. No other pedestrian crossings on Waterman Avenue are recommended.

Lighting

The proposed Project would include a variety of indoor and outdoor lighting. Illumination would be provided for safe access, security, sports activities and other recreational areas. Exterior lighting will include wall-mounted fixtures on buildings, maximum of 25-foot-high pole lights, and bollard lighting.

Construction

Project construction is anticipated to occur in one phase and commence spring of 2020, and would continue for approximately 13 months. Because the Project site is relatively flat, construction is anticipated to result in approximately 19,704 cubic yards (CY) of cut and fill, and no off-site hauling is anticipated.

Construction activities would incorporate site preparation activities, trenching for utilities, necessary excavation and grading, pavement and concrete walkways, and building construction activities such as laying foundation and constructing retaining walls. Construction equipment would include excavators, backhoes, forklifts, compactors, concrete mixers and pumps, scrapers, front loaders, jackhammers, pile drivers, and electric lifts. The Project does not include the construction of any new roads in the Project area.

Pursuant to Section 8.54.070 of the City Municipal Code, construction activities are prohibited between the hours of 8:00 PM and 7:00 AM. Additionally, Section 8.54.020: Prohibited Acts, prohibits the operation or use of loud construction equipment between the hours of 10:00 PM and 8:00 AM, except with the prior approval of the City.

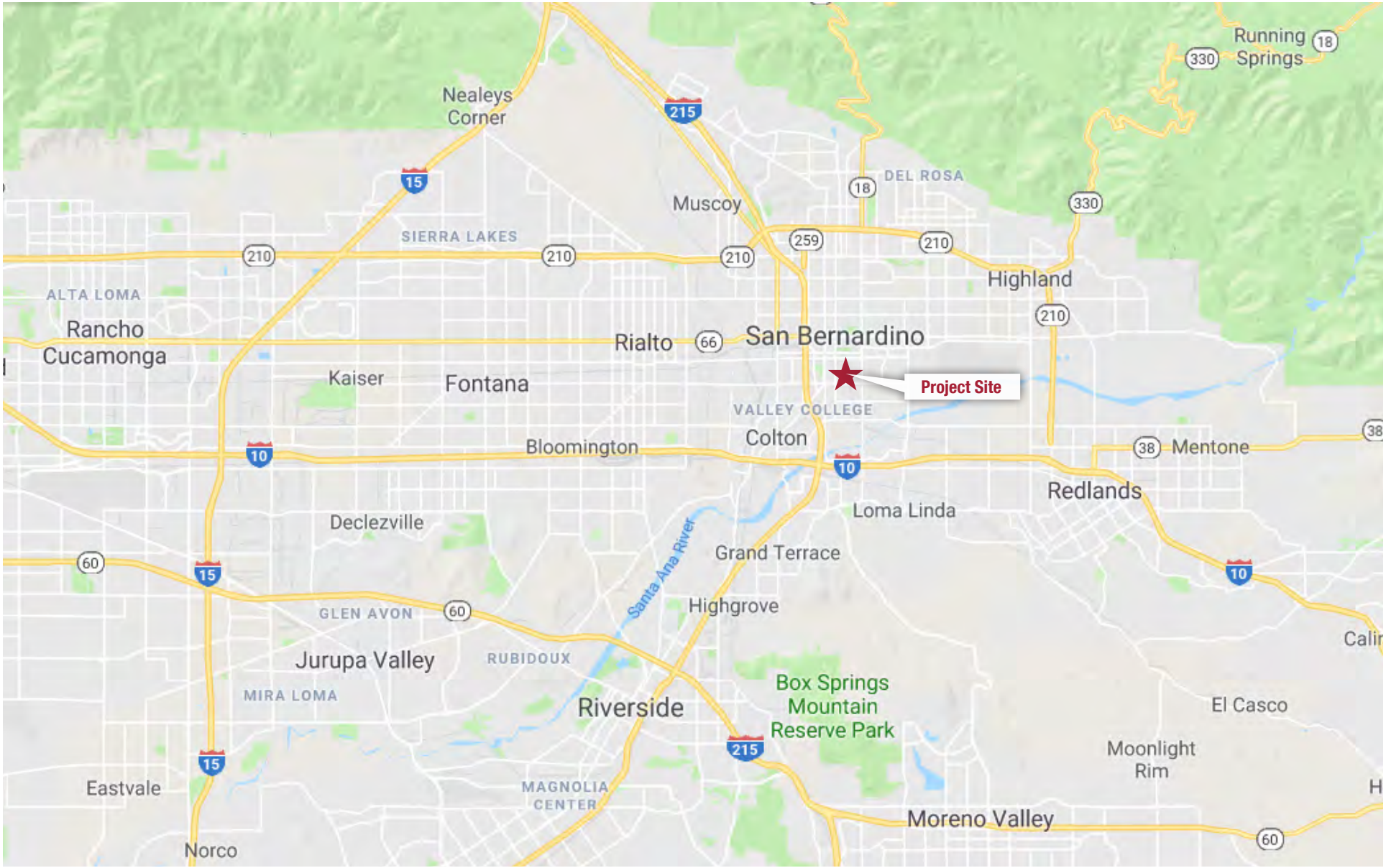

EXHIBIT 1: Regional Location

Norton Science and Language Academy – Initial Study/Mitigated Negative Declaration

City of San Bernardino

Kimley»Horn

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Source: TSK. September 17, 2019. Overall Site Plan

EXHIBIT 2: Local Vicinity Map

Norton Science and Language Academy – Initial Study/Mitigated Negative Declaration

City of San Bernardino

Kimley»Horn

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EXHIBIT 3: Aerial View

Norton Science and Language Academy – Initial Study/Mitigated Negative Declaration

City of San Bernardino

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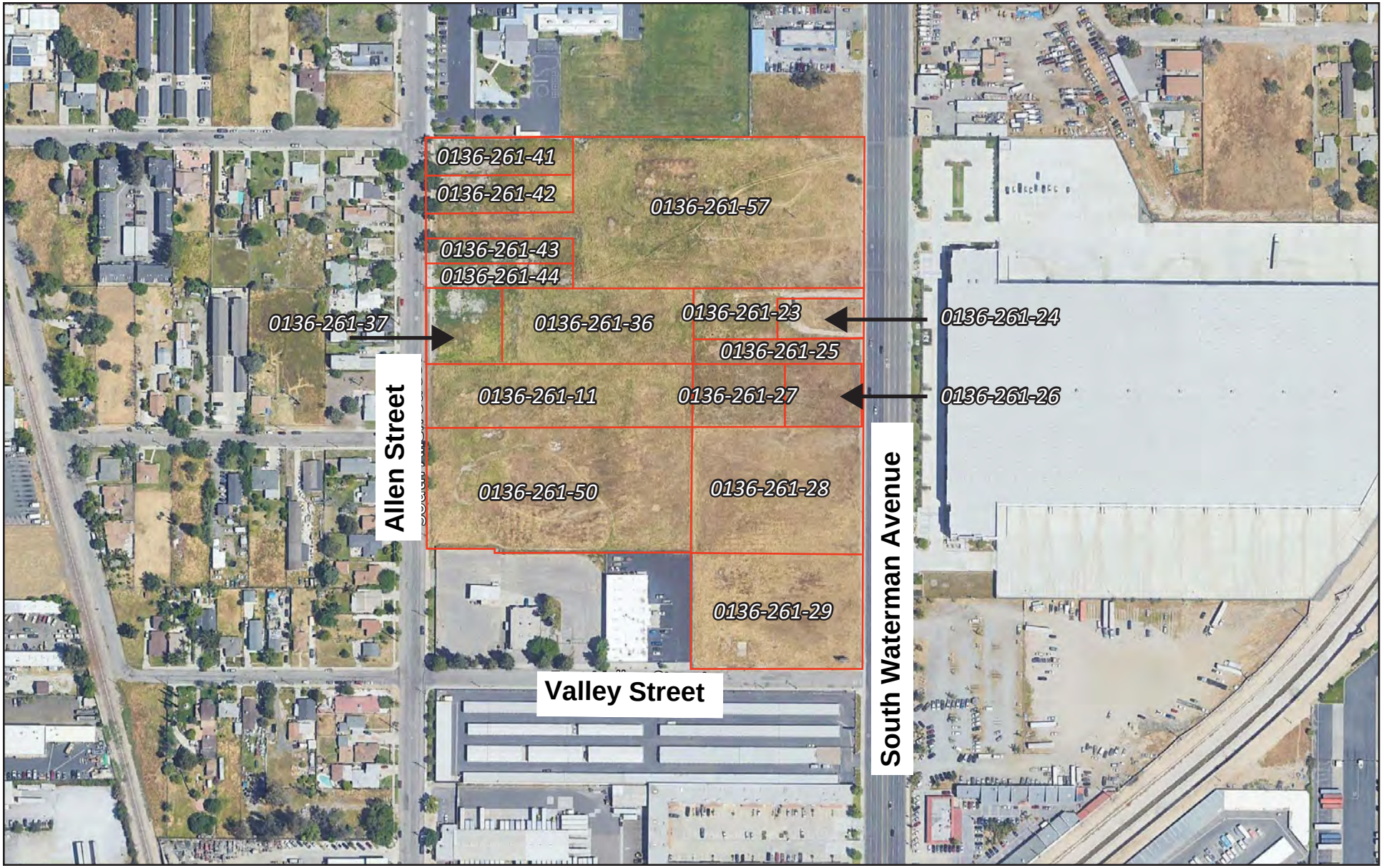

EXHIBIT 4: Project Site Assessor Parcel Numbers

Norton Science and Language Academy – Initial Study/Mitigated Negative Declaration

City of San Bernardino

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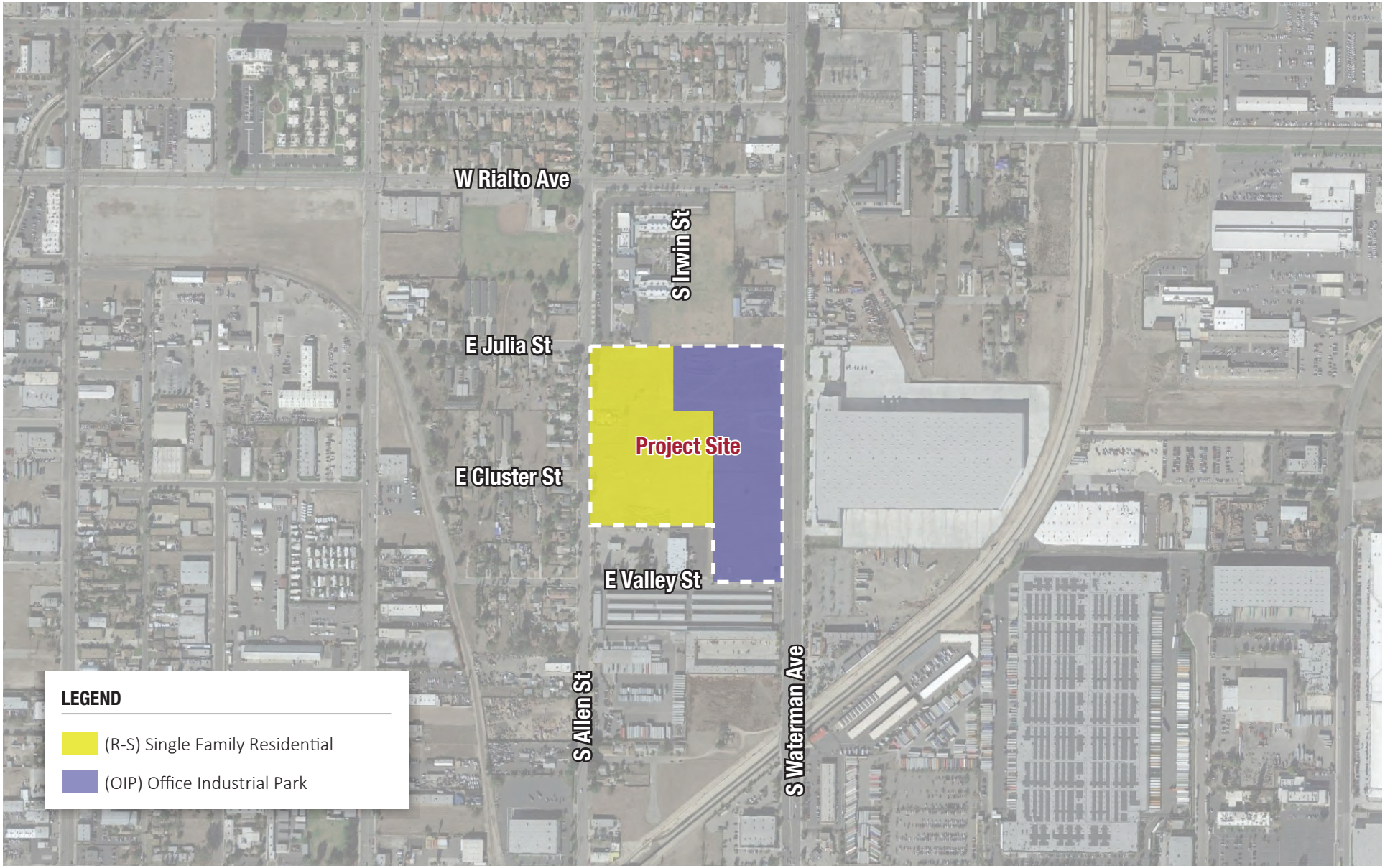

EXHIBIT 5: Existing General Plan Land Use Designation

Norton Science and Language Academy – Initial Study/Mitigated Negative Declaration

City of San Bernardino

Kimley»Horn

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EXHIBIT 6: Proposed General Plan Land Use Designation

Norton Science and Language Academy – Initial Study/Mitigated Negative Declaration

City of San Bernardino

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EXHIBIT 7: Existing Zoning Designation

Norton Science and Language Academy – Initial Study/Mitigated Negative Declaration

City of San Bernardino

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EXHIBIT 8: Proposed Zoning Designation

Norton Science and Language Academy – Initial Study/Mitigated Negative Declaration

City of San Bernardino

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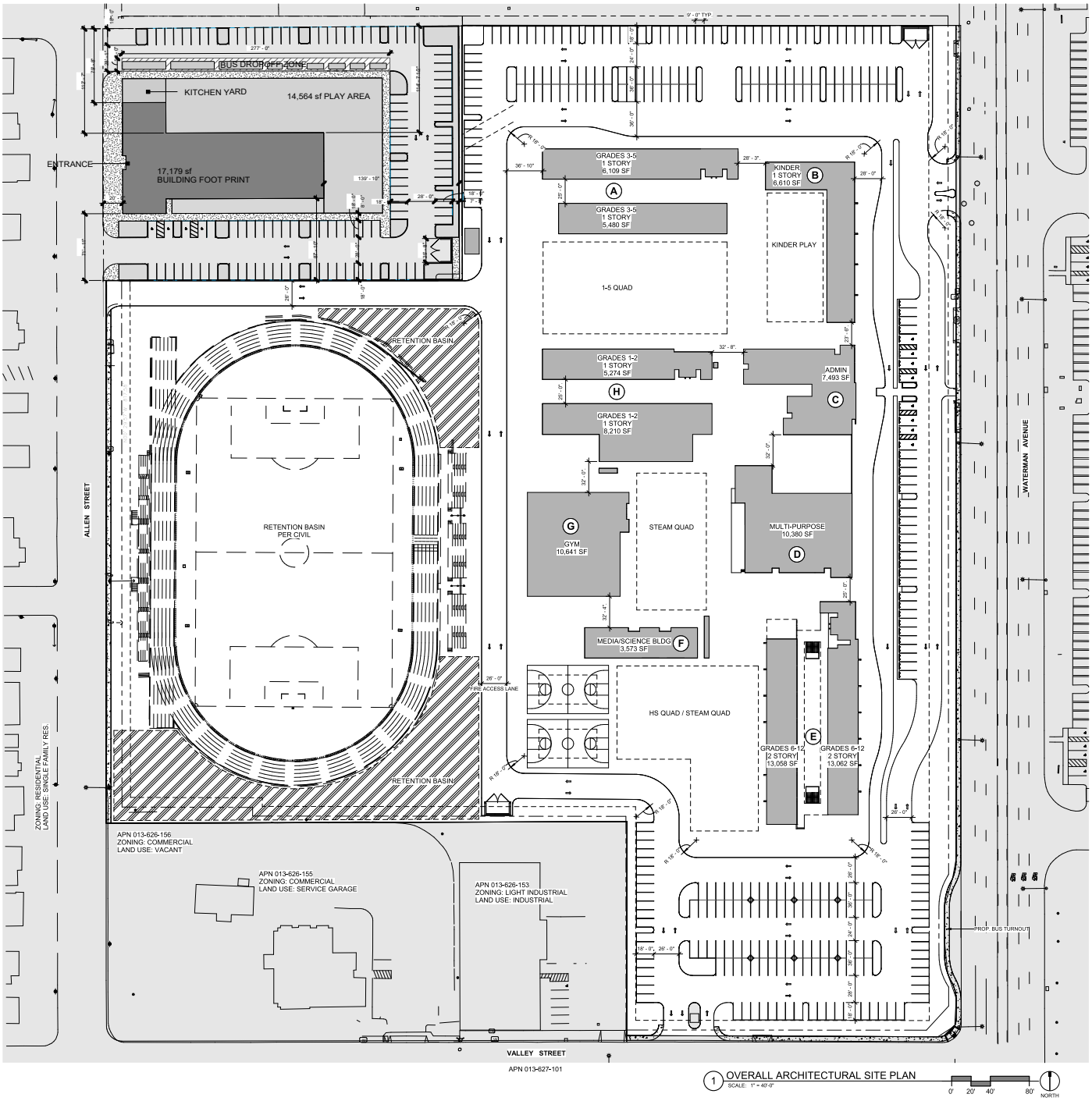

EXHIBIT 9: Site Plan

Norton Science and Language Academy – Initial Study/Mitigated Negative Declaration

City of San Bernardino

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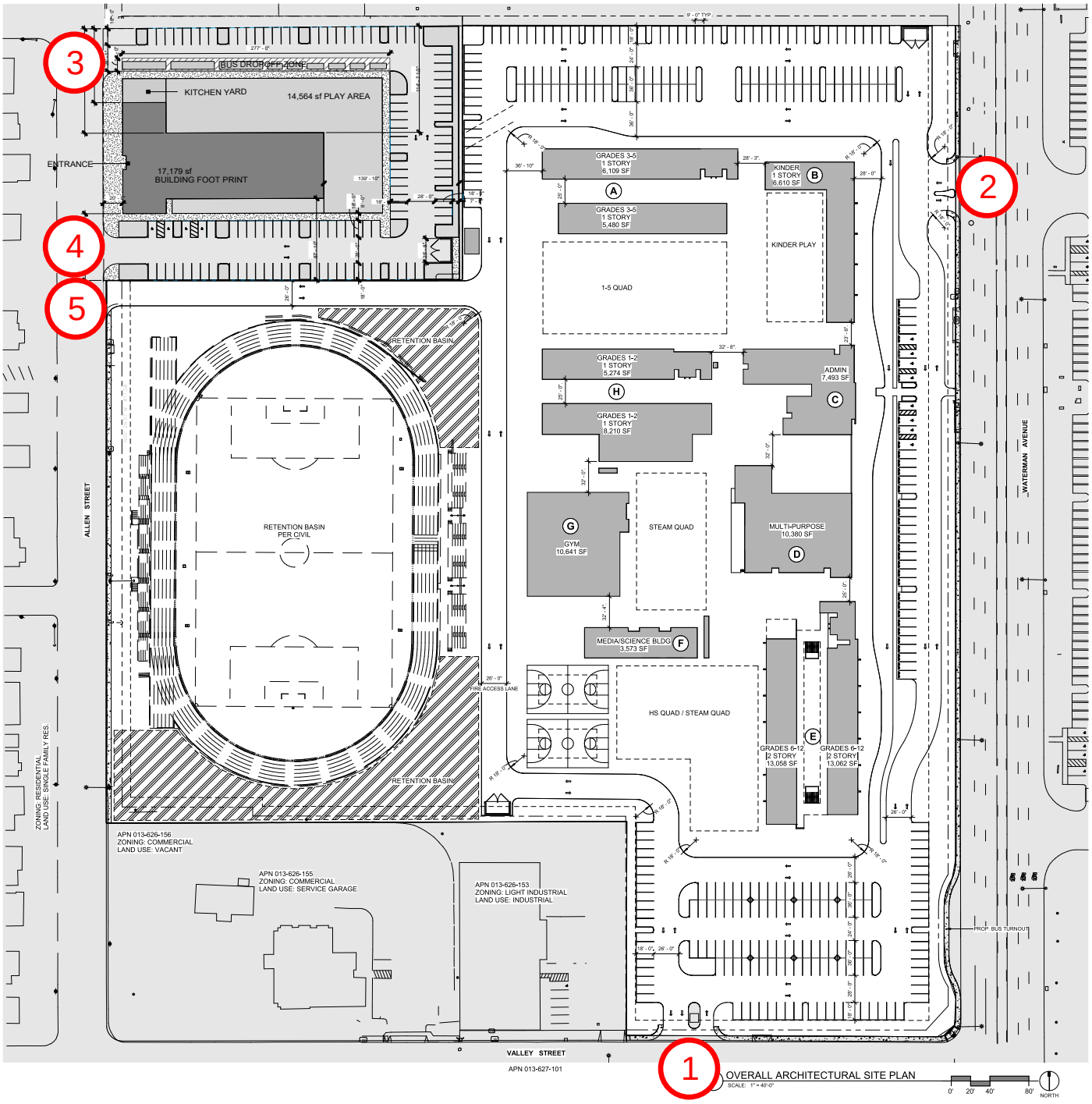

EXHIBIT 10: Proposed Project Site Driveways

Norton Science and Language Academy – Initial Study/Mitigated Negative Declaration

City of San Bernardino

Kimley»Horn

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3.0 INITIAL STUDY CHECKLIST

1. Project Title

Norton Science and Language Academy Project

2. Lead Agency Name and Address

City of San Bernardino
201 North E Street, 3rd Floor
San Bernardino, CA 92401

3. Lead Agency Contact Person and Phone Number

Travis Martin, Associate Planner
909-384-5313

4. Project Location

The Project site is located on the northwest corner of the intersection of Waterman Avenue and Valley Street; refer to **Table 1**, *Project Site Assessor's Parcel Numbers.*

5. Project Applicant's/Sponsor's Name and Address

Lewis Center for Educational Research (LCER)
17500 Mana Road
Apple Valley, CA 92307
Contact: Lisa Lamb
(760) 946-5416

County of San Bernardino - Preschool Services Department (Responsible Agency for Head Start Preschool)
662 S. Tippecanoe Avenue
San Bernardino, CA 92415
Contact: Phalos Haire
(909) 383-2044

6. Existing General Plan Designation

Single Family Residential and Industrial

7. Existing Zoning Designation

Residential Suburban (R-S) 4.5 dwelling units per acre (7,200 minimum lot size), and Office Industrial Park (OIP) 1.0-floor area ratio.

8. Other public agencies whose approval is required

State of California Department of Social Services

9. Project Summary

NSLA Facility

The proposed NSLA campus would involve the construction of a charter school for children from TK through 12th grade. A total of eleven structures composed of multi-purpose rooms, gym and classrooms, totaling approximately 89,890 square feet of building square-foot development on approximately 18 acres; refer to **Table 4**, *Proposed Project Structures and Other Components*, for a description of building square feet and proposed uses.

The school would include the following associated amenities: soccer and track and field, outdoor basketball courts, indoor gym, outdoor play areas, and 316 parking spaces on an approximately 18-acre site. Ingress and egress would be available via Driveways 1, 2, and 5. The campus would provide an internal school bus drop-off/pick-up area. Additionally, a public bus turnout has been provided on the southwest corner of Waterman Avenue and Valley Street. The proposed Project requires the approval of a General Plan Amendment (19-01), Development Code Amendment (19-05), Subdivision (19-03), Tentative Parcel Map (20120), Conditional Use Permit (19-10), and adoption of an MND pursuant to CEQA. Additionally, the MND also analyzes potential environmental impacts from the County of San Bernardino's proposed Head Start/Preschool facility, which is proposed adjacent to the NSLA campus.

Head Start/Preschool Facility

The proposed Head Start/Preschool facility would involve the construction of a County of San Bernardino owned and operated facility. The facility would include an approximately 31,743 square foot facility and approximately 14,564 square feet of outdoor play area, on 2.20 acres. The site would include 110 vehicle parking spaces that will be accessible via Driveways 3 and 4. The site will also allow for school bus ingress and egress for pick-up and drop-off.

The proposed Head Start Preschool requires the approval of a Tentative Parcel Map (20120), and adoption of an MND pursuant to CEQA.

NSLA and Head Start/Preschool Facilities Design Features

Classroom and building design features would include high-efficiency wall assemblies and windows to reduce heating and cooling loads; Energy Star appliances; high-efficiency heating and cooling systems; high efficiency domestic hot water systems; and high-efficiency light-emitting diode (LED) lighting in educational units, common areas, and landscape design.

SCE Power Line Relocation

An existing Southern California Editions (SCE) electrical power pole is located on the northeast portion of the site on APN# 0136-261-57. The power pole would be relocated to the north side of the site along the property line, within the property. Final siting and design is subject to review and approval by SCE and the City.

Frontage Improvements

As part of the proposed Project, new sidewalks will be provided along with curb and gutter and driveways as applicable along all street frontages. The removal and replacement of half-width improvements for the length of the street frontage on Allen Street and on Valley Street will be performed. Waterman will receive half-width grinding and overlay improvement. At this time there is no intended utility work with exception of new connections to existing underground facilities.

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

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

On June 7, 2019, the City initiated tribal consultation with interested California Native American tribes consistent with Assembly Bill (AB) 52. The City requested a consultation from the following Tribes: Gabrielino Band of Mission Indians – Kizh nation, San Manuel Band of Mission Indians (SMBMI), and Soboba Band of Luiseno Indians. No comments or mitigation measures were provided from Gabrielino Band of Mission Indians – Kizh nation, or Soboba Band of Luiseno Indians. SMBMI determined that no consultation was necessary, but did provide mitigation measures, which have been incorporated into this IS/MND.

In addition, the Native American Heritage Commission (NAHC) provided a list of tribes to be consulted regarding the proposed Project pursuant to Senate Bill (SB) 18. On June 17 and 27, 2019, the City invited the following tribes to consult pursuant to SB 18: Gabrielino Band of Mission Indians – Kizh nation, San Manuel Band of Mission Indians (SMBMI), Soboba Band of Luiseno Indians, Los Coyotes Band of Cahuilla and Cupeno Indians, Serrano Nation of Mission Indians, Soboba Band of Luiseno Indians, Santa Rosa Band of

Mission Indians, Agua Caliente Band of Cahuilla Indians, Ramona Band of Cahuilla, Morongo Band of Mission Indians, Cahuilla Band of Indians, Torres-Martinez Desert Cahuilla Indians, Augustine Band of Cahuilla Mission Indians, Serrano Nation of Mission Indians, Cabazon Band of Mission Indians, and San Fernando Band of Mission Indians. No response, comments, or mitigation measures were provided from any of the Tribes pursuant to SB 18. Refer to Section 5, Cultural Resources, and Section 17, Tribal Cultural Resources for additional information.

3.1 Environmental Factors Potentially Affected by the Project

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

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

Determination

On the basis of this initial evaluation, the following finding is made:

I find that the proposed Project COULD NOT have a significa'nt 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.	**X**
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 or a potentially significant unless mitigated impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (bl have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	

CITY OF SAN BERNARDINO Kevin Thomas, Kimley-Horn and Associates.

Signature (Prepared by) Date 10/23/19

Signature Date 10.23.19

3.2 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 would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) “Negative Declaration: Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from a "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," maybe cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

    a) Earlier Analyses Used. Identify and state where they are available for review.

    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    d) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources. A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and

   b) the mitigation measure identified, if any, to reduce the impact to less than significance.

Aesthetics

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

Regional Context

The City of San Bernardino is approximately 60 miles east of the City of Los Angeles in the upper Santa Ana River Valley. This valley is framed by the San Bernardino Mountains on the northeast and east, the Blue Mountains and the Box Springs Mountains abutting the Cities of Loma Linda and Redlands to the south, and the San Gabriel Mountains and the Jurupa Hills to the northwest and southwest, respectively. San Bernardino is surrounded by the cities of Rialto to the west, Colton to the southwest, Loma Linda to the south, Redlands to the southeast, Highland to the east, and the San Bernardino National Forest to the north.

Project Site

The Project site is surrounded by the H. Frank Dominguez Elementary School to the north; a heavy equipment rental business located on the southwest corner of the site and beyond Valley Street is a self-storage facility; a warehouse facility just east; and single-family residential dwelling units to the west. The Project site is mostly vacant and shows signs of previous disturbance; additionally, annual grasses and dirt piles are prominent on the site; refer to **Exhibit 3**, *Aerial View*.

Scenic Vistas

Under CEQA, a scenic vista is defined as a viewpoint that provides expansive views of a highly-valued landscape for the benefit of the general public. The City of San Bernardino General Plan does not officially designate any scenic vistas in the vicinity of the Project site or in the City.

Scenic Resources within Scenic Highways

Scenic highways and routes are a unique component of the circulation system as they traverse areas of unusual scenic or aesthetic value. Two roadways within the City have been nominated as eligible Scenic Highway status; however, they are not officially designated. The portions of State Route (SR) 30, south of SR 330, and SR 330 that pass through the City are designated as Eligible State Scenic Highways – Not Officially Designated. Due to the designation as Eligible Scenic Highways, the provisions of the California Scenic Highways Program apply to these sections of the roadways in the City. The purpose of the California Scenic Highways Program, which was established in 1963, is to "Preserve and protect scenic highway corridors from change which would diminish the aesthetic value of lands adjacent to highways." This program provides guidance for signage, aesthetics, grading, and screening to help maintain the scenic value of the roadway.

(a) Have a substantial adverse effect on a scenic vista?

Less than Significant. Prominent natural features of the Inland Empire include the San Bernardino, San Gabriel, and Box Springs Mountains which offer the most prominent views in the general area. They are located approximately seven miles north, 13 miles northeast and five miles south of the Project site, respectively. In its existing condition, the Project site does not block or hinder views of the surrounding mountains. The Project site is fully surrounded by existing development. The most prominent development near the Project site is an industrial/warehouse facility located just east of the Project site, across Waterman Avenue.

The proposed Project would include permanent structures ranging from one and two-story buildings, a soccer/track and field with benches. The maximum proposed building height would be approximately 34 feet, with heights to roof parapet ranging from 16 feet to 34 feet. The buildings would be of smaller scale than the adjacent industrial/warehouse building, located just east of the site beyond Waterman Avenue. Because the Project site is surrounded by institutional, commercial, and industrial uses to the north, east and south, and because residential buildings west of the proposed Project obscure views of more distant mountains, the proposed Project would not substantially impact scenic vistas. Therefore, impacts would be less than significant.

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

No Impact. The Project site is not located near any State Designated Scenic Highways. Two State Routes within the City of San Bernardino have been designated as Eligible Scenic Highways (SR-

30 and SR-330) located approximately six miles east, but not officially designated as State Designated Scenic Highways. Therefore, the proposed Project would not substantially damage scenic resources within a State scenic highway.[11] No impact would occur.

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

Less than Significant. The Project site is a vacant and previously disturbed site which shows signs of discing and dirt piles on the southern portion of the site from possible construction activities. The surrounding area is fully developed with an elementary school north of the site, commercial and industrial to the east and south, and residential dwelling units to the west. The development of the proposed Project on the site would not degrade the existing visual character or quality of the site. On the contrary, the proposed Project would enhance the visual character and quality of the site. On-site and frontage improvements would beautify the area and would enhance the Project site with the introduction of aesthetically pleasing buildings, on-site fencing, landscaping, trees, and fully developed curb and gutter. Refer to Section 3.0, subsection 9, Project Summary, for a description of frontage improvements.

Short-term Construction Visual Impacts

Short-term construction impacts include heavy construction equipment and machinery (e.g., grading) and staging of the machinery. No valuable aesthetic resources would be destroyed as a result of construction-related activities, because the site is generally vacant and has been heavily disturbed. The site contains dirt piles and remnants of previous structures. Construction impacts are temporary and would cease upon Project completion.

Long-term Visual Impacts

The proposed Project's permanent building structures and associated amenities would be built generally using colors, materials, and textures consistent with the surrounding community, to be compatible with the aesthetic qualities of the community and consistent with Section 19.10, Special Purpose Districts, which includes Public Facility, of the City's Development Code. The proposed structures would add to the visual quality of the site, rather than take away from it. No long-term visual impacts are anticipated from the implementation of the proposed Project.

Therefore, the proposed Project would have a less than significant impact on the visual character of the site and its surroundings.

[11] General Plan EIR Chapter 5.1 Aesthetics, General Plan Figure C-1, Scenic Highways/Routes, Caltrans State Scenic Highway Mapping System: *http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm*, San Bernardino Municipal Code Title 19.

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

Less than Significant. Existing Project site lighting is limited to that of the existing neighboring residential dwelling units located west of the site, and from street lighting along Allen Street, Valley Street, and Waterman Avenue. Project implementation would introduce new sources of light in the Project area for security purposes, including nighttime lighting. Some nighttime lighting is anticipated for the use of the soccer/track and field and outdoor basketball courts. Based on the existing sports program hours at the AAE, also owned by the LCER, it is anticipated that outdoor games can begin as early as 3:30 PM and end at approximately 7:00 PM. Indoor sports such as volleyball and basketball games can begin as late as 5:30 PM and end at approximately 8:00 PM.[12] No sport fields overnight lighting would occur. However, the proposed Project would maintain some overnight lighting for security purposes to prevent vandalism. Outdoor lighting would be consistent with Development Code 19.20-14, Lighting, which states that exterior lighting shall be energy-efficient and shielded or recessed so that direct glare and reflections are contained within the boundaries of the parcel, and shall be directed downward and away from adjoining properties and public rights-of-way. No lighting shall blink, flash, or be of unusually high intensity or brightness. All lighting fixtures shall be appropriate in scale, intensity, and height to the use it is serving. Security lighting shall be provided at all entrances/exits. Additionally, the Project would introduce perimeter landscaping along Allen Street that would further shield residential dwelling units from security lighting.

Furthermore, new lighting plans would be reviewed by the City to ensure conformance with the latest California Green Building Standard Code (Part 11 of Title 24, CCR) such that only the minimum amount of lighting is used and no light spillage occurs. Consistent with City requirements, required landscaping may also help block and reduce light effects on adjacent development.

With respect to daytime glare, the proposed Project would be consistent with Development Code 19.20-11, which states that no glare incidental to any use shall be visible beyond any boundary line of the parcel. Although the Project would increase outdoor nighttime lighting compared to existing conditions, the Project would not increase daytime glare. The proposed Project would comply with the City's Municipal Code and latest California Building Standard Code; thus, compliance with the City's Municipal Code relative to lighting and glare, would reduce impacts to a less than significant impact.

[12] Academy for Academic Excellence. January 2017. *2017 Track & Field Meet Schedule and 2016 Middle School Boys Basketball Schedule.* Available at http://aae.lewiscenter.org/documents/AAE/Athletics/2017%20MS%20Boys%20B-Ball%20Schedule.pdf and http://aae.lewiscenter.org/documents/AAE/Athletics/2017%20T-F%20Meet%20Schedule.pdf, accessed October 2019.

Agricultural and Forestry Resources

ENVIRONMENTAL IMPACTS Issues		Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
2.	**AGRICULTURE AND FOREST 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?				X
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
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))?				X
d.)	Result in the loss of forest land or conversion of forest land to non-forest use?				X
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?				X

Agricultural Resources

The Project site is not used for any type of agricultural activities. According to the California Department of Conservation (DOC) California Important Farmland Finder, the Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The Project site is designated as Urban and Built-Up Land. The nearest Farmland of Statewide

Importance is approximately 1.5 miles northeast. The Project site is not subject to a Williamson Act contract.[13]

Forestry Resources

The Project site is in an area surrounded by existing and planned development.[14] The Project site does not meet the definition of lands designated as forestland or timberland as defined by PRC Sections 12220(g), 4526, and 51104(g).

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?

No Impact. As stated above, the Project site is not used for any type of agricultural activities. According to the California Department of Conservation Important Farmland Map, the Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The Project site is designated as Urban and Built-Up Land. [15] As such, the Project site would have no impact on the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use.

(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project site is not subject to a Williamson Act contract.[16] Therefore, the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract and the Project would have no impact on agricultural or Williamson Act contract areas.

(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))?

No Impact. Refer to response Agricultural and Forestry Resources (*a*). No additional changes would occur from Project implementation that would trigger or result in the rezoning of forest land, or timberland.

[13] DOC. 2019. *California Important Farmland Finder – Williamson Act Map.* Available at. https://maps.conservation.ca.gov/dlrp/ciff/, accessed on September 2019.
[14] General Plan. 2005. Land Use Map, Figure LU-2.
[15] DOC. 2019. *California Important Farmland Finder.* Available at. https://maps.conservation.ca.gov/dlrp/ciff/, accessed on September 2019.
[16] DOC. 2019. *California Important Farmland Finder – Williamson Act Map.* Available at. https://maps.conservation.ca.gov/dlrp/ciff/, accessed on September 2019.

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

No Impact. The Project site does not meet the definition of forestland or timberland, as defined by PRC Sections 12220(g), 4526, and 51104(g). Therefore, the Project would have no impact on these lands.

(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 land?

No Impact. As described above, the Project site is in an urban area surrounded by existing urban development and neither the site, nor the surrounding area is zoned or used for agricultural or forestry uses. Therefore, the Project would not involve changes in the existing environment and would not result in conversion of farmland to nonagricultural use.

Air Quality

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

An Air Quality Assessment and Greenhouse Gas Analysis have been prepared by Kimley-Horn, September 2019. The reports are available in Appendix A.

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

Less than Significant. The Project site is in the western portion of San Bernardino County which is part of the South Coast Air Basin (Air Basin) that includes the non-desert portions of San Bernardino, Los Angeles, and Riverside Counties and all of Orange County. The Air Basin is located on a coastal plain with connecting broad valleys and low hills to the east. Regionally, the Air Basin is bound by the Pacific Ocean to the southwest and high mountains to the east forming the inland perimeter. The Project site is located toward the northeast portion of the Air Basin near the foot of the San Bernardino Mountains which define the eastern boundary of the Air Basin. The South Coast Air Quality Management District (SCAQMD) and the California Air Resources Board (CARB) monitor air quality within the Air Basin.

The Air Quality Management Plan (AQMP) is prepared by SCAQMD and Southern California Association of Governments (SCAG). Air quality plans describe air pollution control strategies and measures to be implemented by a city, county, region, and/or air district. The primary purpose of an air quality plan is to bring an area that does not attain Federal and State air quality standards into compliance with the requirements of the Federal Clean Air Act and California Clean Air Act. Non-attainment is used to refer to an air basin where one or more ambient air quality standards

are exceeded. In addition, air quality plans are developed to ensure that an area maintains a healthful level of air quality based on the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS). The most recently adopted air quality plan is the 2016 Air Quality Management Plan (AQMP), which was adopted by the Board on March 3, 2017.

Projects that are consistent with the regional population, housing, and employment forecasts identified by SCAG are considered to be consistent with the AQMP growth projections, since the forecast assumptions by SCAG forms the basis of the land use and transportation control portions of the AQMP. Additionally, because SCAG's regional growth forecasts are based upon, among other things, land uses designated in general plans, a Project that is consistent with the land use designated in a general plan would also be consistent with the SCAG's regional forecast projections, and thus also with the AQMP growth projections. The SCAQMD's CEQA Handbook identifies two key indicators of consistency with the AQMP:

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 based on the year of Project buildout and phase.

With respect to the first criterion, based on the air quality modeling analysis conducted for the proposed Project, the construction and operation of the Project would not result in significant impacts based on the SCAQMD thresholds of significance; therefore, Project construction and operation would not increase the frequency or severity of existing air quality violations. The proposed Project is not expected to contribute to the exceedance of any air pollutant concentration standards.

With respect to the second criterion, the proposed Project is a school and does not include residential uses and would not represent a significant population increase when compared to the current City of San Bernardino current population (221,130) (DOF, 2018) and to the SCAG's projected growth for the City of 257,400 persons by 2040. Future updates to the AQMP would capture the full buildout (increase in population and housing) of the proposed Project as well as other projects in the City. As such, the proposed Project would not measurably exceed growth assumptions in the AQMP.

SCAG forecasts are based on the General Plans of municipalities in the Air Basin. As addressed in the air quality modeling data (Appendix A), total Project emissions are less than the SCAQMD significance thresholds. The emissions increase due to the proposed Project would not interfere with the AQMP or the attainment of the ambient air quality standards. Therefore, emissions from the Project would not be greater than those anticipated in the AQMP. Therefore, the

determination of AQMP consistency is primarily concerned with the long-term influence of a Project on air quality in the Air Basin. The proposed Project would not result in a long-term impact on the region's ability to meet state and federal air quality standards. Also, the proposed Project would be consistent with the goals and policies of the AQMP for the control of fugitive dust. Impacts would be less than significant.

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

Less than Significant. The SCAQMD quantitative significance thresholds shown in **Table 6**, *SCAQMD CEQA Thresholds of Significance*, were used to evaluate Project emissions impacts.

Table 6: SCAQMD CEQA Thresholds of Significance

Pollutant	Project Construction	Project Operation
	lbs/day	lbs/day
ROGs (VOCs)	75	55
Nitrogen Oxide (NO_X)	100	55
Carbon Monoxide (CO)	550	550
Sulfur Oxides (SO_x)	150	150
Coarse Particulates (PM_{10})	150	150
Fine Particulates ($PM_{2.5}$)	55	55
24-hour $PM_{2.5}$ Increment	10.4 microgram per cubic meter ($\mu g/m^3$)	2.5 $\mu g/m^3$
24-hour PM_{10} Increment	10.4 $\mu g/m^3$	2.5 $\mu g/m^3$
Annual PM_{10} Increment	1.0 $\mu g/m^3$ annual average	
1-hour Nitrogen Dioxide (NO_2) Increment	0.18 parts per million (ppm) (State)	
Annual NO_2 Increment	0.03 ppm (State) and 0.0534 ppm (Federal)	
1-hour Sulfur Dioxide (SO_2) Increment	0.25 ppm (State) and 0.075 ppm (Federal – 99th percentile)	
24-hour SO_2 Increment	0.04 ppm (State)	
24-hour Sulfate Increment	25 ug/m^3 (State)	
1-hour CO Increment	20 ppm (State) and 35 ppm (Federal)	
8-hour CO Increment	9.0 ppm (State/Federal)	
Toxic Air Contaminants (TACs) Including Carcinogens and Non-Carcinogens	Maximum Incremental Cancer Risk ≥10 in 1 million	
	Cancer Burden >0.5 excess cancer cases (in areas ≥1 in 1 million)	
	Chronic and Acute Hazard Index ≥1.0 (Project increment)	
Odor	Project creates an odor nuisance pursuant to Rule 402	
Greenhouse Gases (GHGs)	10,000 metric tons per year (MT/yr) of carbon dioxide equivalent (CO_2e) for industrial facilities	
	3,000 MT/yr CO_2e for land use projects (draft proposal)	

Construction Phase

Emissions from the construction phase of the proposed Project were estimated based on information from the Project developer for construction equipment requirements and schedule. **Table 7**, *Construction-Related Emission*s, provides a summary of the emission estimates for construction of the proposed Project, assuming standard measures are implemented to reduce emissions, as calculated with the California Emissions Estimator Model (CalEEMod). It is mandatory for all construction projects in the Air Basin to comply with SCAQMD Rule 403 for fugitive dust that include, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the construction site, and maintaining effective cover overexposed areas.

Table 7: Construction-Related Emissions (Maximum Pounds Per Day)

Construction Year	ROG (VOC)	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
2020	4.56	50.27	34.34	0.10	10.12	6.32
2021	27.12	30.91	32.58	0.10	5.52	2.16
SCAQMD Threshold	75	100	550	150	150	55
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Notes: SCAQMD Rule 403 Fugitive Dust applied. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stockpiles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. No mitigation was applied to construction equipment. Refer to Appendix A for Model Data Outputs.						
Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs.						

As shown in **Table 7**, *Construction Related Emissions*, emissions associated with construction are below the significance thresholds for all construction phases and pollutants. Because emissions are less than the significance levels as shown in Table 7, they would not conflict or obstruct the air quality standards.

Operational Phase

The main operational impacts associated with the Project would be impacts associated with traffic. Minor impacts would be associated with energy use and area sources. The emissions associated with Project-generated traffic and area sources were compared against the SCAQMD's quantitative significance criteria to address whether the Project would result in emissions that would violate any air quality standard or contribute substantially to an existing or proposed air quality violation. Trip generation rates from the Project Traffic Impact Analysis were used in CalEEMod to estimate emissions from vehicles.

Table 8, *Operational Emissions*, shows unmitigated and mitigated criteria operational emissions respectively and evaluates mitigated emissions against SCAQMD significance thresholds. Mass

emissions of criteria pollutants operation are below applicable SCAQMD significance thresholds, therefore impacts would be less than significant.

Table 8: Operational Emissions

Source	Emissions (pounds per day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer Emissions						
Area	2.53	0.00	0.04	0.00	0.00	0.00
Energy	0.03	0.25	0.21	0.00	0.02	0.02
Mobile	4.95	31.45	59.32	0.22	16.02	4.39
Total	**7.51**	**31.70**	**59.58**	**0.22**	**16.04**	**4.41**
Winter Emissions						
Area	2.53	0.00	0.04	0.00	0.00	0.00
Energy	0.03	0.25	0.22	0.00	0.02	0.02
Mobile	4.33	31.56	51.97	0.20	16.02	4.39
Total	**6.89**	**31.81**	**52.22**	**0.20**	**16.04**	**4.41**
SCAQMD Threshold	55	55	550	150	150	55
SCAQMD Threshold Exceeded?	No	No	No	No	No	No
Notes: Total PM_{10} or $PM_{2.5}$ includes fugitive dust and engine exhaust.						
Source: CalEEMod version 2016.3.2; refer to Appendix A.						

Cumulative Impacts

A significant impact to air quality would occur if the Project would result in a cumulatively considerable net increase of any criteria pollutant for which the region is nonattainment under an applicable NAAQS or CAAQS (including releasing emissions which exceed quantitative thresholds for ozone precursors). The proposed Project emissions were evaluated based on the quantitative emission thresholds established by SCAQMD in its CEQA Air Quality Handbook (SCAQMD 1993, as amended) to determine whether the Project would result in a cumulatively considerable increase in non-attainment criteria pollutants or exceed the quantitative thresholds for ozone precursors. The SCAQMD has established quantitative thresholds against which a Project's emissions could be evaluated to determine if there is a potential for a significant impact. In the event direct impacts from a project are less than significant, a project may still have a cumulatively considerable impact on air quality if the emissions from the Project, in combination with the emissions from other proposed, or reasonably foreseeable future projects are in excess of screening levels identified above, and the Project's contribution accounts for more than an insignificant proportion of the cumulative total emissions. The proposed Project would not result in significant construction or operational air quality impacts including non-attainment criteria pollutants. Therefore, the Project's contribution to regional pollutant concentrations would not be cumulatively considerable.

With respect to the proposed Project's construction-period air quality emissions and cumulative Air Basin conditions, the SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the Federal Clean Air Act mandates. The Project's short-term and long-term emissions were evaluated using the CalEEMod model. The analysis assumed compliance with SCAQMD Rule 403 fugitive dust controls during construction, that, among other methods of dust control, requires frequent water applications. SCAQMD rules, mandates, and compliance with adopted AQMP emissions control measures would also be imposed on construction projects throughout the Air Basin, which would include related projects. Compliance with SCAQMD rules and regulations would reduce the proposed Project's construction-related impacts to a less than significant level. Therefore, Project-related construction emissions, in combination with those from other projects in the area, would not substantially deteriorate the local air quality.

The proposed Project would not result in long-term air quality impacts; emissions would not exceed SCAQMD operational thresholds. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Emission reduction technology, strategies, and plans are constantly being developed. As a result, the proposed Project would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant. Impacts would be less than significant.

(c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant. A significant impact may occur when a project would generate pollutant concentrations to a degree that would significantly affect sensitive receptors, which include populations that are more susceptible to the effects of air pollution than the population at large. Exposure of sensitive receptors is addressed for the following situations: CO hotspots; criteria pollutants and toxic air contaminants (TACs, specifically diesel PM) from on-site construction; exposure to off-site TAC emissions; and asbestos and lead-based paint during demolition.

Localized Significance Threshold Analysis

The Localized Significance Threshold (LST) Methodology provides a look-up table for construction and operational emissions based on the emission rate, location, and distance from receptors, and provides a methodology for air dispersion modeling to evaluate whether construction or operation could cause an exceedance of an ambient air quality standard.

An LST analysis was performed for this Project to show that NO_X, CO, PM_{10}, $PM_{2.5}$ emissions would not contribute to or cause an exceedance of California Ambient Air Quality Standards (CAAQS) or National Ambient Air Quality Standards (NAAQS). For determining localized AQ impacts from small projects in a defined geographic Source-Receptor Area (SRA), the LST methodology provides mass emission rate lookup tables for 1-acre, 2-acre, and 5-acre parcels by SRA. The tabulated LSTs represent the maximum mass emissions from a project that would not cause or

contribute to an exceedance of CAAQS or NAAQS for the pollutants listed above and were developed based on ambient concentrations of these pollutants for each SRA in the Air Basin.

The highest daily emission rates occur during the site preparation and grading phases of construction due to the use of heavy earthmoving equipment. The Project site is approximately 18 acres in SRA Zone 34, the Central San Bernardino Valley. The peak daily soil disturbance occurs during the site preparation phase and equates to a maximum soil disturbance of 4 acres based on the estimated amount of construction equipment that may be needed and the SCAQMD guidance document Fact Sheet for Applying CalEEMod to LTS (SCAQMD 2017). Thus, thresholds for 4 acres of disturbance were interpolated between the 2- and 5-acre values on the screening lookup tables were used to evaluate NO_X, CO, PM_{10}, and $PM_{2.5}$ impacts on nearby receptors at the closest, most conservative, distance of 25 meters (82 feet) for construction activities. The 5-acre thresholds were used for operations. Although the Project site is greater than five acres, the LST lookup tables can be used to show that even if the daily emissions from all Project operations were emitted on a five-acre site, the impacts would be less than significant.

The LST results provided in **Table 9**, *Construction LST Evaluation*, and **Table 10**, *On-site Operational LST Evaluation*, shows that on-site emissions from both construction and operations, respectively, would meet the LST passing criteria at the nearest receptors.

Table 9: Construction LST Evaluation

Criteria Pollutants	Mitigated (lbs/day)	Threshold (lbs/day)	Threshold Exceeded?
NO_X	50.20	237	No
CO	31.96	1,466	No
PM_{10}	9.92	12	No
$PM_{2.5}$	6.27	7	No
Notes: SRA Zone 34 for Central San Bernardino Valley with a 4-acre area at 25 meters to receptor; only on-site construction emissions are included in Construction LST Evaluation.			
Sources: SCAQMD 2008b, 2017, CalEEMod version 2016.3.2; refer to Appendix A.			

Table 10: On-site Operational LST Evaluation

Criteria Pollutants	Mitigated (lbs/day)	Threshold (lbs/day)	Threshold Exceeded?
NO_X	1.83	237	No
CO	2.85	1,466	No
PM_{10}	0.82	3	No
$PM_{2.5}$	0.24	2	No
Notes: SRA Zone 34 for Central San Bernardino Valley with a 5-acre area at 25 meters to receptor; only on-site operational emissions are included for Operational LST Evaluation; mobile emissions are assumed to be 95% off-site for LST analyses.			
Sources: SCAQMD 2008b, 2017, CalEEMod version 2016.3.2; refer to Appendix A.			

Based on the estimates of the emissions associated with Project operations, the emissions are below the significance criteria for all pollutants. Because emissions are less than the significance levels, they would not conflict or obstruct the implementation of the AQMP. Additionally, vehicle

emissions are projected to decrease with time due to phase-out of older, more polluting vehicles and increasingly stringent emissions standards. The proposed Project's construction and operational emissions would not exceed SCAQMD LSTs. Therefore, the Project would not result in significant localized construction or operational emissions.

Carbon Monoxide Hot Spots

Projects involving traffic impacts may result in the formation of locally high concentrations of CO, known as CO "hot spots." The Project is anticipated to generate 2,182 average daily trips (ADT). Based on the analysis presented below, a CO "hot spots" analysis is not needed to determine whether the change in the level of service (LOS) of an intersection in the Project would have the potential to result in exceedances of the CAAQS or NAAQS. An adverse CO concentration ("hot spot") would occur if an exceedance of the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur. At the time of the 1993 Handbook, the Air Basin was designated nonattainment under the NAAQS and CAAQS for CO. It has long been recognized that CO hot spots are caused by vehicular emissions, primarily when idling at congested intersections. However, 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 (there are 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 the Air Basin is now designated as attainment. Also, CO concentrations in the Project vicinity have steadily declined.

Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard. An analysis prepared for CO attainment in the Air Basin by the SCAQMD can assist in evaluating the potential for CO exceedances. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 AQMP. As part of the SCAQMD CO Hot spot analysis, the Wilshire Boulevard/Veteran Avenue intersection, one of the most congested intersections in Southern California with an ADT volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 parts per million (ppm), which is well below the 35-ppm federal standard. The proposed Project considered herein would not produce the volume of traffic required to generate a CO hot spot in the context of SCAQMD's 2003 CO hot-spot analysis. The Air Basin was re-designated as attainment in 2007 and is no longer addressed in the SCAQMD's AQMP. The 2003 AQMP is the most recent AQMP that addresses CO concentrations. As the CO hotspots were not experienced at the Wilshire Boulevard and Veteran Avenue intersection even as it accommodates 100,000 vehicles daily, it can be reasonably inferred that CO hotspots would not be experienced at any vicinity intersections as a result of 2,182 additional vehicle trips attributable to the Project. Therefore, impacts would be less than significant in this regard.

Construction-Related Diesel Particulate Matter

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

The use of diesel-powered construction equipment would be temporary and episodic. The duration of exposure would be short and exhaust from construction equipment dissipates rapidly. Current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of nine, 30, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities. The closest sensitive receptors are located approximately 80 feet from the property boundary and major Project construction areas.

California Office of Environmental Health Hazard Assessment has not identified short-term health effects from DPM. Construction is temporary and would be transient throughout the site (i.e., move from location to location) and would not generate emissions in a fixed location for extended periods of time. Construction would be subject to and would comply with California regulations limiting the idling of heavy-duty construction equipment to no more than five minutes to further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions. For these reasons, DPM generated by construction activities, in and of itself, would not be expected to expose sensitive receptors to substantial amounts of air toxics and the Project would have a less than significant impact.

Criteria Pollutant Health Impacts

On December 24, 2018, the California Supreme Court issued an opinion identifying the need to provide sufficient information connecting a project's air emissions to health impacts or explain why such information could not be ascertained (*Sierra Club v. County of Fresno* [Friant Ranch, L.P.] [2018] Cal.5th, Case No. S219783).

As previously discussed, Project emissions would be less than significant and would not exceed SCAQMD thresholds (refer to Table 7 and Table 8). Localized effects of on-site project emissions on nearby receptors were also found to be less than significant (refer to Table 9 and Table 10). The LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard. The LSTs were developed by the SCAQMD based on the ambient concentrations of that pollutant for each SRA and distance to the nearest sensitive receptor. Ambient air quality standards establish levels of air quality necessary, with an adequate margin of safety, to protect

public health, including the health of sensitive populations such as asthmatics, children, and the elderly. Project-related emissions would not exceed the regional thresholds or the LSTs, and therefore would not exceed the ambient air quality standards or cause an increase in the frequency or severity of existing violations of those standards. Therefore, sensitive receptors would not be exposed to criteria pollutant levels exceeding ambient air quality standards.

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

Less than Significant.

The proposed Project would not include any significant odor sources and any odors generated would be similar in nature to odors from school land uses. The surrounding land uses are residential and industrial in nature. During a site visit, no unusual or objectionable odors were detected from on-site or off-site land uses. During construction of the Project, emissions from construction equipment, such as diesel exhaust, and volatile organic compounds from architectural coatings and paving activities may generate odors. However, these odors would be temporary, would disperse rapidly, and would be localized to the construction site; and therefore, are not expected to affect a substantial number of people. Thus, impacts relating to both operational and construction activity odors from implementation of the Project would be less than significant.

Biological Resources

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
4. 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 Wildlife or U.S. Fish and Wildlife Service?				X
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 Wildlife or U.S. Fish and Wildlife Service?				X
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
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?				X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
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?				X

(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 Wildlife or U.S. Fish and Wildlife Service?

No Impact. The proposed Project is not within a potential habitat for sensitive wildlife[17], and is not within a biological resource area.[18]

[17] General Plan. 2005. *Figure NRC-1 – Potential Habitat for Sensitive Wildlife*.
[18] General Plan. 2005. *Figure NRC-2 – Biological Resource Areas*.

Although recent and historical impacts have decimated local vegetation, remnants of a formerly dominant coastal sage scrub vegetation community have been sporadically observed in the general area. Signature plant species include black sage (*Salvia mellifera*), California brittlebush (*Encelia californica*), California buckwheat (*Eriogonum fasciculatum*), California sagebrush (*Artemesia californica*), deerweed (*Lotus scoparius*), golden yarrow (*Eriophyllum confertiflorum*), laurel sumac (*Malosma laurina*), lemonadeberry (*Rhusintegrifolia*), poison oak (*Toxicodendron diverilobum*), purple sage (*Salvia leucophyla*), sticky monkeyflower (*Mimulus aurantiacus*), sugar bush (*Rhus ovate*), toyon (*Heteromeles arbutifolia*), white sage (*Salvia apiana*), coastal century plant (*Agave shawii*), coastal cholla (*Opuntia prolifera*), Laguna Beach liveforever (*Dudleya stolonifera*), many-stemmed liveforever (*Dudleya multicaulis*), our Lord's candle (*Yucca whipplei*), and (*Optunia Stricta)* prickly pear cactus. However, on-site vegetation consists primarily of ruderal vegetation dominated by non-native grasses. [19]

The General Plan identifies areas approximately 3.0 miles to the southeast and northwest from the Project site as areas likely to host the (*Dipodomys merriami parvus*) San Bernardino Kangaroo Rat (Critical Habitat), the (*Polioptila californica californica*) Coastal California Gnatcatcher (Critical Habitat), and the (*Rhaphiomidas terminatus abdominalis*) Delhi Sand Flower-Loving Fly. The Project site is not identified as an area where wild habitat occurs.

The proposed Project would no impact, either directly or through habitat modifications, on any species identified as a candidate, as a sensitive, or as a special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). No sensitive or special status plant species are identified to occur on-site.

(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 Wildlife or U.S. Fish and Wildlife Service?

No Impact. The Project site is relatively flat and has no native habitats on-site. Additionally, no drainages, riparian habitat, or aquatic features occur on-site. No impacts to riparian habitat or other sensitive natural community would occur as a result of the proposed Project implementation.

[19] BCR Consulting, LLC. 2019. *Cultural Resources Assessment*. (See Appendix B)

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

No Impact. As discussed above in Biological Resources Threshold (b), the Project site does not contain potential jurisdictional features, including Federally protected wetlands and other features that carry water. Therefore, no impacts would occur.

(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?

No Impact. The Project site is vacant and has been disturbed due to demolition and discing. Furthermore, the site is not a recognized wildlife corridor, and site development would not impede the movement of fish or wildlife. The proposed Project would not result in the removal of vegetation (i.e., trees and shrubs) with the potential to support nesting migratory birds that are protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code. An alignment of mature oak trees occur along the frontage of Allen Street at the Project site's western boundary.[20] However, the trees would be preserved and no impact would occur to any potential birds that might use the trees for nesting or resting purposes.

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

No Impact. The City's Municipal Code Section 19.28.100 requires a tree removal permit for anyone who wants to remove five or more trees within a 36-month period. Section 19.28.100 mandates the replacement of removed trees on a 1:1 basis. The five existing oak trees on Allen street would be maintained as part of the Project, therefore the Project would not require a tree removal permit pursuant to Section 19.28.100. No conflict with any local policy is anticipated; nor is a conflict anticipated with ordinances protecting biological resources such as a tree preservation policy. As previously stated, the Project site does not contain natural biological resources; the site has been previously disturbed and the only natural biological resources are the oak trees. Because the Project is not anticipated to remove the trees, no conflict with a tree preservation policy would occur. However, in the event that existing tree are required to be removed, a tree removal permit would be required in compliance with the City Municipal Code Section 19.28.100.

[20] BCR Consulting, LLC. 2019. *Cultural Resources Assessment*. (See Appendix B)

(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?

No Impact. The Project site is not located within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State Habitat Conservation Plan. Therefore, no impact would occur.

Cultural Resources

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
5. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?		X		
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		X		
c) Disturb any human remains, including those interred outside of dedicated cemeteries?		X		

A Cultural Resources Assessment has been prepared by BCR Consulting, LLC. June 2019. The report is available in Appendix B to this IS/MND.

The report and research was completed pursuant to CEQA, the PRC Chapter 2.6, Section 21083.2, and CCR Title 14, Chapter 3, Article 5, Section 15064.5. The pedestrian cultural resources survey was intended to locate and document previously recorded or new cultural resources, including archaeological sites, features, isolates, and historic-period buildings, that exceed 45 years in age within defined Project boundaries. The Project site was examined using 15-meter transect intervals, where accessible. This study intended to determine whether cultural resources are located within the Project boundaries, whether any cultural resources are significant pursuant to the above-referenced regulations and standards, and to develop specific mitigation measures that will address potential impacts to existing or potential resources.

Methodology

Records Search. Prior to the field survey a records search was conducted at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton. This archival research reviewed the status of all recorded historic and prehistoric cultural resources, and survey and excavation reports completed within one mile of the current Project site. Additional resources reviewed included the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), and documents and inventories published by the California OHP. These include the lists of California Historical Landmarks, California Points of Historical Interest, Listing of National Register Properties, and the Inventory of Historic Structures.

Field Survey. An intensive-level cultural resources field survey of the Project site was conducted on May 20, 2019. The survey was conducted by walking parallel transects spaced approximately 15 meters apart across 100 percent of the Project site, where accessible. Cultural resources were

recorded on Department of Parks and Recreation (DPR) 523 forms. Ground visibility averaged approximately 20 percent within Project boundaries. Because of low ground visibility, 15 shovel scrapes ranging from one to two square meters were excavated to clear vegetation and inspect sediment immediately below the surface for the presence of cultural resources. Digital photographs were taken at various points within the Project site. These included overviews as well as detail photographs of all cultural resources. Cultural resources were recorded per the California OHP *Instructions for Recording Historical Resources* in the field using:

- Detailed note-taking for entry on DPR Forms
- Hand-held Garmin Global Positioning Systems (GPS) for mapping purposes
- Digital photography of all cultural resources

Records Search. Data from the SCCIC revealed that 52 previous cultural resources studies have taken place, and 35 cultural resources have been recorded, within one mile of the Project site. Of the 52 previous studies, none have assessed the Project site specifically, and no cultural resources have been previously recorded within its boundaries. The records search is summarized as follows in **Table 11,** *Cultural Resources and Report Within One Mile of the Project Site:*

Table 11: Cultural Resources and Report Within One Mile of the Project Site

USGS 7.5 Min Quadrangle	Cultural Resources Within One Mile of the Project Site	Studies Within One Mile of the Project Site
San Bernardino South, California (1980)	P-36-2794: prehistoric food processing (1/2 mile NE) P-36-4186: historic-period Atwood Adobe (3/4 mile NW) P-36-4191: historic-period commercial site (3/4 mile NW) P-36-4288: historic-period building (1 mile NW) P-36-5554: historic-period Martin Adobe (3/4 mile NW) P-36-6101: historic-period railroad (1 mile E) P-36-6796: historic-period cemetery (1 mile N) P-36-7138: historic-period commercial site (Unknown) P-36-8061: historic-period building (1 mile NW) P-36-8062: historic-period building (1 mile NW) P-36-10399: historic-period Chinatown (3/4 mile NW) P-36-10400: hist.-period commercial bldg. (3/4 mile NW) P-36-10820: historic-period railroad (3/4 mile N) P-36-12916: historic-period building (1/2 mile N) P-36-15511-15513, 15534, 15536, 15538, 15542-15545, 15547: historic-period structures (1 mile E) P-36-17659: hist.-period Mormon School Site (Unknown) P-36-17760: hist.-period Mormon Stockade (3/4 mile NW) P-36-17723: historic-period Mormon Mill (1/4 mile S) P-36-17733: historic-period building (3/4 mile NW) P-36-17797: Cox-Bradley Adobe (3/4 mile NW) P-36-17818: hist.-per. Orange Show grounds (1 mile SW) P-36-20673: historic refuse scatter (1/2 mile N) P-36-20806: historic-period building (1 mile NW) P-36-23628: hist-period bldg. foundations (1/2 mile SE) P-36-27089: historic-period bottle (3/4 mile W)	SB106-0406, 0407, 0413, 0791 0847, 0864, 1371, 1562, 1572, 1729, 2091, 2112, 2216, 2260, 2208, 2403, 2587, 2224, 2436, 2787, 2871, 2964, 2943, 3452, 3933, 3944, 3452, 4326, 4337, 4349, 4364, 4633, 4635, 4639, 5594, 5595, 5619, 5621, 5624, 6290, 6291, 6446, 6447, 6939, 6940, 7011, 7121, 7258, 7371, 7463, 7620, 7700
Source: BCR Consulting, LLC. June 2019. Cultural Resources Assessment. Appendix B.		

Field Survey. During the field survey, the Project site was carefully inspected and the surveyor identified a historic-period electrical distribution tower alignment on the Project site. The alignment consists of two modern wooden towers and two historic period wooden towers. The alignment is temporarily designated KIM1907-H-1. Based on appearance and inspection tags, the modern towers are less than 45 years old and do not require further consideration. Of the two historic-period towers, one contained a 1943 inspection nail and the second contained a 1945 inspection nail. These have been recorded on DPR 523 forms. No other cultural resources were identified.

Vegetation within the Project site included dense seasonal grasses, and sediments consisted of sandy silt with very few rocks. An alignment of mature oak trees was noted along the frontage of Allen Street at the Project site's western boundary. The trees do not appear to be historic in age. Disturbances within the Project site were severe and included excavation associated with demolition of former residences and to construct and maintain roads, dicing for weed-abatement, and modern dumping.

Significant Evaluations. The criteria for determining the significance of impacts to cultural resources are based on Section 15064.5 of the *CEQA Guidelines* and Guidelines for the Nomination of Properties to the CRHR. Properties eligible for listing in the CRHR and subject to review under CEQA are those meeting the criteria for listing in the CRHR, or designation under a local ordinance.

Significance Criteria

California Register of Historical Resources (CRHR). The CRHR criteria are based on NRHP criteria. For a property to be eligible for inclusion on the CRHR, one or more of the following criteria must be met:

1. It is associated with the events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the U.S.;
2. It is associated with the lives of persons important to local, California, or U.S. history;
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, represents the work of a master, possesses high artistic values; and/or
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

In addition to meeting one or more of the above criteria, the CRHR requires that sufficient time has passed since a resource's period of significance to "obtain a scholarly perspective on the events or individuals associated with the resources." (CCR 4852 [d][2]). The CRHR also requires that a resource possess integrity. This is defined as the ability for the resource to convey its

significance through seven aspects: location, setting, design, materials, workmanship, feeling, and association.

(a) Cause an adverse change in the significance of a historical resource pursuant to §15064.5?

Less than Significant with Mitigation. The records search conducted at the SCCIC revealed 52 previous cultural resources studies have taken place, and 35 cultural resources have been recorded within one mile of the Project site. Of the 52 previous studies, none assessed the Project site, and no cultural resources have been previously recorded within the record search boundaries; refer to **Table 11,** *Cultural Resources and Report Within One Mile of the Project Site.*

The two World War II era distribution towers, temporarily designated Resource KIM1907-H-1, found on-site were evaluated using the CRHR criteria. The evaluation concluded the following:

Although Resource KIM1907-H-1 was intended for pre-war residential use, it is not specifically associated with events significant to local, state, or national history (Criterion 1), or with lives of persons important to local, California, or U.S. history (Criterion 2). This resource consists of ubiquitous t-shaped wooden-pole style towers that do not embody distinctive characteristics of a type, period, region, or method of construction, or represent the work of an important creative individual or possess high artistic values (Criterion 3). It has not and is not likely to yield information important in prehistory or history (Criterion 4). This resource is therefore recommended not eligible under any of the four criteria for listing on the California Register, and as such is not recommended a historical resource under CEQA.[21]

Additionally, although the Resource occupies its original location, demolition activities and lot reconfiguration have severely diminished the integrity of setting and association. Also, replacement of original towers with modern towers have diminished its integrity of design, materials, workmanship, and feeling. This resource is therefore not eligible under any of the four criteria for listing on the CRHR, and as such is not considered a historical resource under CEQA. No other historical era resources were identified on-site. Based on these results, no additional cultural resources work or monitoring is necessary during proposed Project activities. However, in an abundance of caution, and in the event that currently unknown and unanticipated resources are unearthed during construction, Mitigation Measure (MM) CUL-1 MM CUL-2, and MM CUL-3 would reduce potential impacts to such resources to a less than significant level. Therefore, impacts to historical resources would be less than significant.

Mitigation Measure:

MM CUL-1 The applicant or project/construction manager shall provide Worker Environmental Awareness Training (WEAP), prior to commencing construction, to

[21] BCR Consulting. June 2019. *Cultural Resources Assessment, page 9*.

inform all on-site construction workers of proper procedures in the event that cultural resources are discovered during construction.

MM CUL-2 In the event that pre-contact/historic era cultural resources are discovered during site grading or excavations, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find (due to low resource sensitivity, an archaeologist is not required onsite during construction). Work on the other portions of the Project outside of the buffered area may continue during this assessment period. Additionally, the SMBMI Cultural Resources Department shall be contacted, as detailed within MM TCR-1, regarding any pre-contact/historic era finds and be provided information after the Project archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.

MM CUL-3 If significant pre-contact/historic era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the Project archaeologist will develop a Monitoring and Treatment Plan, the drafts of which shall be provided to SMBMI for review and comment, as detailed within MM TCR-1. The Project archaeologist will monitor the remainder of the Project construction and implement the Plan accordingly.

(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less than Significant with Mitigation. As discussed above, the Project site has been heavily disturbed. Given the condition of the site, there are no known archaeological resources on the Project site. Because the Inland Empire is known for San Manuel Band of Mission Indians historic territories, MM CUL-4 is added to the Project to ensure any archaeological resources that may be found on the site are properly identified and protected. With inclusion of this measure, potential project impacts regarding archaeological resources would be reduced to less than significant levels.

Mitigation Measure:

MM CUL-4 Prior to the initiation of ground-disturbing activities and consistent with MM CUL-1, field personnel shall be alerted to the possibility of buried prehistoric or historic cultural deposits. In the event that field personnel encounter buried cultural materials, work in the immediate vicinity (within a 100-foot buffer of the find) will cease and a qualified archaeologist will be retained to assess the significance of the find. The qualified archaeologist will have the authority to stop or divert construction extraction as necessary. If the qualified archaeologist finds that any cultural resources present meet eligibility requirements for listing on the

CRHR or the NRHP, plans for the treatment, evaluation, and mitigation of impacts to the find will need to be developed. Prehistoric or historic cultural materials that may be encountered during ground-disturbing activities include:

- historic artifacts such as glass bottles and fragments, cans, nails, ceramic and pottery fragments, and other metal objects;
- historic structural or building foundations, walkways, cisterns, pipes, privies, and other structural elements;
- prehistoric flaked-stone artifacts and debitage (waste material), consisting of obsidian, basalt, and or cryptocrystalline silicates;
- groundstone artifacts, including mortars, pestles, and grinding slabs;
- dark, greasy soil that may be associated with charcoal, ash, bone, shell, flaked stone, groundstone, and fire-affected rocks.

(c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Less than Significant Impact. No formal cemeteries are in or near the Project area. Most Native American human remains are found in association with prehistoric archaeological sites. As discussed previously, the Project site is not proximate to identified archaeological resources. Given the extent of disturbances from the residential and previous uses, it is unlikely that ground-disturbing activities associated with the construction of the NSLA would exceed depths of previous disturbance. However, there is always the possibility that subsurface construction activities associated with the proposed Project, such as trenching and grading, could potentially damage or destroy previously undiscovered human remains. Pursuant to State of California Health and Safety Code provisions (notably §7050.5-7055), should any human remains be uncovered, all construction activities must cease and the County Coroner be immediately contacted. As required by State Law, the Project is anticipated to follow the following during construction activities:

- If human remains or funerary objects are encountered during any activities associated with the Project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the Project; and

- The Lead Agency and the Project Applicant shall immediately contact the San Bernardino County Coroner and SMBMI in the event that any human remains are discovered during implementation of the Project. If the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner shall ensure that notification is provided to the NAHC within twenty-four (24) hours of the determination, as required by California Health and Safety Code § 7050.5 (c).

The NAHC-identified Most Likely Descendant (MLD), shall be allowed, under California PRC § 5097.98 (a), to (1) inspect the site of the discovery and (2) make determinations as to how the human remains and funerary objects shall be treated and disposed of with appropriate dignity. The MLD, Project applicant/developer/landowner, and Lead Agency agree to discuss in good faith what constitutes "appropriate dignity" as that term is used in the applicable statutes. The MLD shall complete its inspection and make recommendations within forty-eight (48) hours of receiving notification from either the Project Applicant or the NAHC, as required by California PRC §5097.98. Reburial of human remains and/or funerary objects shall be accomplished in compliance with the California PRC §5097.98 (a) and (b). The MLD, in consultation with the Project applicant/developer/landowner, shall make the final discretionary determination regarding the appropriate disposition and treatment of human remains and funerary objects.

The Project is anticipated to have a less than significant impact on human remains, including those interred outside of dedicated cemeteries.

Energy

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
6. ENERGY. Would the project:				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				X

Building Energy Conservation Standards[22]

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the California Energy Commission) in June 1977 and are updated every three years (Title 24, Part 6, of the CCR). Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. On June 10, 2015, the California Energy Commission (CEC) adopted the 2016 Building Energy Efficiency Standards, which went into effect on January 1, 2017. On May 9, 2018, the CEC adopted the 2019 Building Energy Efficiency Standards, which will take effect on January 1, 2020.

The 2019 Standards will improve upon the 2016 Standards. Under the 2019 Title 24 standards, residential buildings are expected to be about seven percent more energy-efficient and nonresidential buildings will use about 30 percent less energy due mainly to lighting upgrades.

(a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?

Electricity

Less than Significant. SCE provides electricity to the Project area. Currently, the existing site does not use any electricity because it is a vacant site. Therefore, Project implementation would result in a permanent increase in electricity over existing conditions. Based on the CalEEMod emissions modeling, the Project would have an annual demand of 354,107-kilowatt hours (kWh) (0.35 Gigawatt hours [GWh]). In 2018, the County consumed 15,323 GWh and SCE consumed

[22] The emissions model uses 2016 building code energy consumption rates. The project would be subject to the 2019 code. The adjustments are incorporated in the mitigation module of CalEEMod to meet current regulatory standards. As these are adjustments to be consistent with current code requirements, they are not mitigation or design features.

83,400 GWh.[23] The Project's increased demand represents approximately 0.002 percent of electricity consumption the County and 0.0004 percent of SCE's consumption. Therefore, the Project's increased demand is expected to be adequately served by the existing SCE electrical facilities. Total electricity demand in SCE's service area is forecast to increase by approximately 23,000 Gigawatt hours (GWh)—between 2019 and 2035.[24] The increase in electricity demand from the Project would represent an insignificant percent increase (i.e., less than a fraction of one percent) compared to overall demand in SCE's service area. Therefore, projected electrical demand would not significantly impact SCE's level of service.

It should also be noted that the Project design and materials would be required to comply with the 2019 Building Energy Efficiency Standards, which take effect on January 1, 2020. Prior to issuance of a building permit, the City of San Bernardino Public Works Department would review and verify that the Project plans demonstrate compliance with the current version of the Building and Energy Efficiency Standards. The Project would also be required to adhere to the provisions of CALGreen, which establishes planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants.

Some design features include high-efficiency wall assemblies and windows to reduce heating and cooling loads; Energy Star appliances; high-efficiency heating and cooling systems; high efficiency domestic hot water systems; and high-efficiency light-emitting diode (LED) lighting in educational units, common areas, and landscape design. Project development would not interfere with achievement of the 60 percent Renewable Portfolio Standard set forth in SB 100 for 2030 or the 100 percent standard for 2045. These goals apply to SCE and other electricity retailers. Renewable energy is generally defined as energy that comes from resources which are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat. As electricity retailers reach these goals, end-user non-renewable electricity use would decrease from current estimates. The Project would also be required to comply with the latest applicable building energy efficiency standards, which would minimize building energy consumption.

Natural Gas

SoCalGas provides natural gas service to the Project area. The increased demand is expected to be adequately served by the existing SoCalGas facilities. From 2018 to 2035, natural gas demand is expected to decline from 236 billion cubic feet (bcf) (2.36 billion therms) to 186 Bcf, (1.90 billion therms), while supplies remain constant at 3.775 billion cubic feet per day (bcfd) (0.04 billion

[23] California Energy Commission, *California Energy Consumption Database*. Available at https://ecdms.energy.ca.gov/, accessed on October 17, 2019.

[24] State of California Energy Commission. 2018. *California Energy Demand 2018-2030 Revised Forecast - Figure 49: Historical and Projected Baseline Consumption, SCE Planning Area*. Available at file:///C:/Users/ruben.salas/Downloads/TN223244_20180419T154213_California_Energy_Demand_20182030_Revised_Forecast.pdf, accessed on September 2019.

therms per day) from 2015 through 2035. Based on the CalEEMod emissions modeling, the Project would have an annual demand of 525,44 kBTU (0.005254 million therms) of natural gas. In 2018, the County consumed 500 million therms and SoCalGas consumed 5,156 million therms of natural gas.[25] The Project's increased demand represents approximately 0.001 percent of natural gas consumption the County and 0.0001 percent of SoCalGas' consumption. Therefore, the natural gas demand from the proposed Project would represent a nominal percentage of overall demand in SoCalGas' service area (i.e., less than a fraction of one percent). The proposed Project would not result in a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation.

Fuel

During construction, transportation energy use depends on the type and number of trips, vehicle miles traveled, fuel efficiency of vehicles, and travel mode. Transportation energy use during construction would come from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel and/or gasoline. The use of energy resources by these vehicles would fluctuate according to the phase of construction and would be temporary. Most construction equipment during demolition and grading would be gas-powered or diesel-powered, and the later construction phases would require electricity-powered equipment. Impacts related to transportation energy use during construction would not require expanded energy supplies or the construction of new infrastructure; impacts would not be significant.

During Project operations, energy consumption would be associated with visitor, student, and employee vehicle trips; delivery and supply trucks; and trips by maintenance and repair crews. The Project will be located near I-215 and I-10, reducing the need to drive long distances to a major highway, and adjacent to existing residential development. Based on the Project's vehicle trip generation and emissions modeled in CalEEMod, the Project would consume approximately 293,316 gallons of gasoline per year. In 2018, the non-desert portion of the County consumed 652,840,890 gallons of gasoline. The Project's increased demand represents approximately 0.04 percent of gasoline consumption the non-desert portion of the County. Therefore, the gasoline demand from the proposed Project would represent a nominal percentage of overall consumption in the region (i.e., less than a fraction of one percent). Consequently, the proposed Project would not result in a substantial demand for energy that would require expanded supplies or the construction of other infrastructure or expansion of existing facilities. Project operations would comply with all applicable fuel efficiency standards and would not substantially affect

[25] California Energy Commission, *California Energy Consumption Database*. Available at https://ecdms.energy.ca.gov/, accessed on October 17, 2019.

existing fuel supplies or resources. Additionally, fuel consumption associated with vehicle trips generated by the proposed Project would not be considered inefficient, wasteful, or unnecessary.

The proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Impacts are less than significant, and no mitigation is required.

(b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No impact. Currently, there are no adopted local or regional GHG reduction plans applicable to the proposed Project. Project design and operation would comply with State Building Energy Efficiency Standards, appliance efficiency regulations, and green building standards. Project development would not cause inefficient, wasteful and unnecessary energy consumption, and no adverse impact would occur.

Geology and Soils

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
7. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?			X	
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?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			X	
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?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	

Seismicity and Seismic Hazards

The City of San Bernardino is traversed by major earthquake fault lines and flood channels, which must be considered in new developments and design standards.[26] The Project is in the southern California region, which is prone to ground shaking. All Project components would be constructed to the more recent California Building Code (CBC) standards and would be designed in conformance with all applicable standards to resist the harmful effect of seismic ground shaking.

The San Andreas Earthquake Fault Zone traverses the City in a northwest to southeast fashion, following the foothills along the northern edge of the City and approximately 6.0 miles north of the Project site. The San Jacinto and Loma Linda Earthquake Fault Zones further traverse the City, also in a northwest to southeast fashion, through the lower middle and southern portions of the City and approximately 2.0 miles southwest and south of the Project site, respectively.

Earthquake-Induced Liquefaction, Surface Rupture Potential, and Settlement

Liquefaction is the sudden loss of soil shear strength and sudden increase in porewater pressure caused by shear strains, as could result from an earthquake. Research has shown that saturated, loose to medium-dense sands with a silt content less than about 25 percent and located within the top 40 feet are most susceptible to liquefaction and surface rupture/lateral spreading. These zones delineate regional susceptibility and can vary greatly due to groundwater level changes. Site-specific geotechnical reports are necessary to determine site-specific liquefaction potential and possible design mitigation. Section 15.08 Liquefaction, of the City of San Bernardino Municipal Code requires that a Registered Civil Engineer prepare a report and include mitigation measures for the Proposed Project. Measures included to address liquefaction can include wider foundations, over-excavation, and structural changes to the building(s). While the exact measures are dependent upon final building design that will not be known until the building permit application, and the liquefaction report is a requirement of the City's Municipal Code, there is no reason to include this requirement as a mitigation measure.

(a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Less than Significant. The City is located between several active fault zones including the San Andreas Fault, the San Jacinto Fault, and the Loma Linda Fault. According to the General Plan, the Project site is not in an Alquist-Priolo Fault Zone. Because southern California is an active fault

[26] City of San Bernardino. 2005. *General Plan*, *Safety Element - Figure S-4, page 10-21.* Avalable at http://www.sbcity.org/civicax/filebank/blobdload.aspx?blobid=26199, accessed September 2019.

zone, all structures are subject to adherence to all applicable regulations in the 2016 California Building Code (CBC). With adherence to the latest CBC, impacts would be less than significant.

ii) Strong seismic ground shaking?

Less than Significant Impact. The Project site is in an area of high regional seismicity. Ground shaking originating from earthquakes along active faults in the region is expected to induce lower horizontal accelerations due to smaller anticipated earthquakes and/or greater distances to other faults. The Project would be required to be in conformance with the most recently published CBC, City regulations, and other applicable standards. The CBC design standards correspond to the level of seismic risk in each location and are intended primarily to protect public safety and secondly to minimize property damage. Conformance with standard engineering practices and design criteria would reduce the effects of seismic groundshaking to a less than significant level.

iii) Seismic-related ground failure, including liquefaction?

Less than Significant. According to the City's General Plan Figure S-5, *Liquefaction Susceptibility*, the Project site is in a general area designated as an Area of High Liquefaction Susceptibility. The Project would be required to be in conformance with the most recently published CBC, and Municipal Code 15.08 Liquefaction, applied at the building permit application and plan check phase of the Project. As the Municipal Code requires preparation of a liquefaction report as part of the building permit process, and the City ensures compliance with the recommendation of that report as part of the plan check and building inspection process, no additional mitigation is required and this impact is less than significant.

iv) Landslides?

No Impact. The Project site is relatively flat and is not within an area susceptible to landslides[27]. Therefore, there would be no impact from landslides on the proposed Project site.

(b) Result in substantial soil erosion or the loss of topsoil?

Less than Significant with Mitigation. The City of San Bernardino has 22 soil series and two soil types. Delhi fine sand and Tujunga loamy sand are both susceptible to wind erosion if left exposed; Cienaba sandy loam, Friant rock outcrop, Greenfield sandy loam, and Saugus sandy loam are susceptible to water erosion. The Project site is composed of mostly Grangeville fine sandy loam[28], which are usually found in alluvial fans and have moderate infiltration rates. Grading always has the potential to expose soils that would be subject to erosion by wind and water.

[27] General Plan. 2005. *Geology and Soils, Figure S-7*.
[28] Natural Resources Conservation Service (NRCS) – UC Davis. 2019. *SoilWeb*. Available at https://casoilresource.lawr.ucdavis.edu/gmap/, accessed on June 2019.

The following General Plan policies require measures to mitigate any potential runoff and erosion:

Policy 9.4.10: Ensure compliance with the Federal Clean Water Act requirements for National Pollutant Discharge Elimination System (NPDES) permits, including requiring the development of Water Quality Management Plans, Erosion and Sediment Control Plans, and Storm Water Pollution Prevention Plans for all qualifying public and private development and significant redevelopment in the City.

Policy 9.4.11: Implement an urban runoff reduction program consistent with regional and federal requirements, which includes requiring and encouraging the following examples of Best Management Practices (BMPs) in all developments:

- Increase permeable areas, utilize pervious materials, install filtration controls (including grass lined swales and gravel beds), and divert flow to these permeable areas to allow more percolation of runoff into the ground;
- Replanting and hydroseeding of native vegetation to reduce slope erosion, filter runoff, and provide habitat;
- Use of porous pavement systems with an underlying stone reservoir in parking areas;
- Use natural drainage, detention ponds, or infiltration pits to collect and filter runoff;
- Prevent rainfall from entering material and waste storage areas and pollution-laden surfaces; and
- Require new development and significant redevelopment to utilize site preparation, grading, and other BMPs that provide erosion and sediment control to prevent construction-related contaminants from leaving the site and polluting waterways.

Policy 10.5.4: Require new development and significant redevelopment to utilize site preparation, grading and foundation designs that provide erosion control to prevent sedimentation and contamination of waterways.

Additionally, the Project would comply with applicable provisions of State Law, including Section 15.04.210 of the CBC, Appendix J, Section J112 – Grading Operations, which includes the following provisions:

Section J112.1 General. "All parties performing grading operations, under a grading permit issued by the Building Official, shall have verification of land use entitlement and shall take reasonable preventive measures, as directed by the Building Official and incorporated into the Grading Policy promulgated by the Community Development Department, to avoid earth or other materials from the premises being deposited onto adjacent streets or properties, by the action of storm waters or wind, by spillage from conveyance vehicles or by other causes."

Section J112.2 Removal of Materials Within 24 Hours. "Earth or other materials which are deposited on adjacent streets or properties shall be completely removed by the permittee as soon as practical, but in any event within 24 hours after receipt of written notice from the Building Official, or NPDES Coordinator, or their designees, to remove the earth or materials, or within such additional time as may be allowed by written notice."

Section J112.3 Noncompliance. "In the event that any party performing grading shall fail to comply with the requirements of this Section, the Building Official shall have the authority to engage the services of a contractor to remove the earth or other materials. All charges incurred for the services of the contractor shall be paid to the City by the permittee prior to acceptance of the grading."

With adherence to the above stated policies, BMPs, State Law, and the Regional Water Quality Control Board (RWQCB) General Construction Permit, which requires the implementation of a variety of BMPs on construction and operation of the Project, this would minimize potential erosion from the site over the short- and long-term and a less than significant impact would occur.

(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?

Less than Significant. According to the General Plan, the Project site is located within an area of identified for liquefaction susceptibility[29], and it is also identified as being within an area of potential ground subsidence[30] which can be caused by natural geologic processes or by human activity such as subsurface mining or pumping of groundwater or oil. However, subsidence resulting from groundwater withdrawal has not been reported in the region since the SBMWD launched the groundwater recharge program. As discussed previously, the Project site is

[29] General Plan. 2005. *Figure S-5, Liquefaction Susceptibility*.
[30] General Plan. 2005. *Figure S-6, Potential Subsidence Areas*.

relatively flat and is not located within an area susceptible to landslides. The proposed Project is not identified to be located within areas prone to landslides or lateral spreading. Nevertheless, the Project would be required to be in conformance with the most recently published CBC, and City regulations. Conformance with standard engineering practices and design criteria would reduce the effects of unstable soils to a less than significant level.

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

Less than Significant. When certain soil types are exposed to water, mainly those with moderate to high clay content, they can deform and either shrink or swell, depending on their particular physical characteristics. Such soils can expose overlying buildings to differential settlement and other structural damage. According to the Natural Resources Conservation Service (NRCS) Web Soil Survey, the site is composed of Class B Grangeville fine sandy loams, which have moderate infiltration rates.[31] Sandy loams are not considered expansive soils due to their ability to transmit water efficiently. Furthermore, the proposed Project would be required to be in conformance with the most recently published CBC and the soils report prepared for the Project. Conformance with standard engineering practices and design criteria, such as modified foundations or over-excavation and soil modification, would reduce the potential for substantial risks to life or property as a result of expansive soils is minimal and the associated impacts would be less than significant.

(e) Soil capability to support waste water disposal, including 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 to the City's sewer collection system, which provides service to the surrounding vicinity and would not require an alternative method of wastewater conveyance. An existing 18-inch inch sewer line traverses the northern portion of the site in an east-west direction. This sewer line would be protected in place, and used for the proposed Project. The elementary, middle and high school buildings would connect to the existing sewer line on the north portion of the site, the gym would connect to the sewer line on Waterman Avenue, and the head start/preschool facility would connect to the sewer line on Allen Street. Therefore, no impacts associated with septic or alternative wastewater disposal systems would occur.

(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant. As discussed above, a Cultural Resources Assessment was conducted for the Project site to determine if paleontological resources exist within the Project boundaries.

[31] NRCS. 2019. *Web Soil Survey*. Available at https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx, accessed September 2019.

According to the Cultural Resources Assessment, the entirety of the Project site has been subject to ground disturbance.

Implementation of the proposed Project is anticipated to have a less than significant impact to paleontological resources. However, if previously undocumented paleontological resources are identified during earthmoving activities, the Lead Agency and the Project Applicant shall immediately contact the San Bernardino County Coroner and SMBMI shall be contacted to assess the nature and significance of the find, diverting construction excavation if necessary. Therefore, with implementation of the previously mentioned actions, a less than significant would occur.

Greenhouse Gas Emissions

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

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

Less than Significant.

Background

Gases that trap heat in the atmosphere are called greenhouse gases (GHGs). The major concern with GHGs is that increases in their concentrations are causing global climate change. Global climate change is a change in the average weather on Earth that can be measured by wind patterns, storms, precipitation, and temperature. Although there is disagreement as to the rate of global climate change and the extent of the impacts attributable to human activities, most in the scientific community agree that there is a direct link between increased emissions of GHGs and long-term global temperature increases.

The principal GHGs are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs). Because different GHGs have different warming potential and CO_2 is the most common reference gas for climate change, GHG emissions are often quantified and reported as CO_2 equivalents (CO_2e)[32]. For example, SF_6 is a GHG commonly used in the utility industry as an insulating gas in circuit breakers and other electronic equipment. SF_6, while comprising a small fraction of the total GHGs emitted annually world-wide, is a much more potent GHG with 22,800 times the global warming potential as CO_2. Therefore, an emission of one metric ton (MT) of SF_6 could be reported as an emission of 22,800 MT of CO_2e. Large emission sources are reported in million metric tons (MMT) of CO_2e.

[32] A carbon dioxide equivalent (CO_2e) is a metric measure used to compare the emissions from various greenhouse gases based upon their global warming potential.

Regulations and Significance Criteria

California Governor Arnold Schwarzenegger issued Executive Order S-3-05 in June 2005, which established the following GHG emission reduction targets: (a) by 2010: Reduce GHG emissions to 2000 levels; (b) by 2020: Reduce GHG emissions to 1990 levels; and (c), by 2050: Reduce GHG emissions to 80 percent below 1990 levels.

AB 32 Statutes of 2006, Health and Safety Code Section 38500 et seq. require that CARB determine what the Statewide GHG emissions level was in 1990 and approve a Statewide GHG emissions limit that is equivalent to that level, to be achieved by 2020. CARB has approved a 2020 emissions limit of 427 million metric tons of CO_2 equivalent ($MTCO_2e$). Additionally, issued in April 2015, Executive Order B-30-15 requires Statewide GHG emissions to be reduced 40 percent below 1990 levels by 2030.

Executive Order B-30-15, which was issued in April 2015, requires statewide GHG emissions to be reduced 40 percent below 1990 levels by 2030. SB 32 (SB 32), signed into law in September 2016, codifies the 2030 GHG reduction target in Executive Order B-30-15. SB 32 authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030 and to adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions. With SB 32, the California Legislature passed companion legislation AB 197, which provided additional direction for developing an updated Scoping Plan. CARB released the second update to the Scoping Plan to reflect the 2030 target set by Executive Order B-30-15 and codified by SB 32 in November 2017.

Additionally, signed into law in September 2018, SB 100 increased California's renewable electricity portfolio from 50 to 60 percent by 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045.

Due to the nature of global climate change, it is not anticipated that any single development project would have a substantial effect on global climate change. GHG emissions from the proposed project would combine with emissions emitted across California, the United States, and the world to cumulatively contribute to global climate change.

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

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

With the tiered approach, a project is compared with the requirements of each tier sequentially and would not result in a significant impact if it complies with any tier. Tier 1 excludes projects that are specifically exempt from SB 97 from resulting in a significant impact. Tier 2 excludes projects that are consistent with a GHG reduction plan that has a certified final CEQA document and complies with AB 32 GHG reduction goals. Tier 3 excludes projects with annual emissions lower than a screening threshold. The SCAQMD is proposing a screening threshold of 10,000 metric tons of CO_2e ($MTCO_2e$) per year for industrial projects and 3,000 $MTCO_2e$ for non-industrial projects. SCAQMD concluded that projects with emissions less than the screening threshold would not result in a significant cumulative impact.

Tier 4 consists of three decision tree options. Under the Tier 4 first option, SCAQMD initially outlined that a project would be excluded if design features or mitigation measures resulted in emissions 30 percent lower than business as usual emissions. However, the Working Group did not provide a recommendation for this approach. The Working Group folded the Tier 4 second option into the third option. Under the Tier 4 third option, a project would be excluded if it was below an efficiency-based threshold of 4.8 $MTCO_2e$ per service population per year or 3.0 $MTCO_2e$ per service population per year for projects opening after 2020. Tier 5 would exclude projects that implement off-site mitigation (GHG reduction projects) or purchase offsets to reduce GHG emission impacts to less than the proposed screening level.

GHG efficiency metrics are utilized as thresholds to assess the GHG efficiency of a project on a per capita basis or on a service population basis (the sum of the number of jobs and the number of residents provided by a project) such that a project would allow for consistency with the goals of AB 32 (i.e., 1990 GHG emissions levels by 2020) and SB 32 (40 percent below 1990 levels by 2030). GHG efficiency thresholds can be determined by dividing the GHG emissions inventory goal, by the estimated population and employment. This method allows highly efficient projects with higher mass emissions to meet the overall reduction goals of AB 32 and SB 32, and is appropriate, because the threshold can be applied evenly to all project types (residential or commercial retail only and mixed use).

Service population is traditionally defined as the summation of residents and employees that are generated by a project. The origin behind the service population metric is derived from CARB's 2008 Scoping Plan. The Scoping Plan identified that based on the GHG emissions inventories for

the state, people living in California generate approximately 14 tons of GHG emissions per capita and need to reduce GHG emissions to approximately 10 tons of GHG per capita to meet the GHG reduction target of AB 32. Additionally, according to the 2017 Scoping Plan, to meet post-2020 targets, per capita emissions would need to be no more than 6 $MTCO_2e$ per capita by 2030 and 2 $MTCO_2e$ per capita by 2050. Because people who live in California generally work in California, the service population metric used in the Scoping Plan did not include employees. As CEQA significance thresholds were being developed by individual air districts, air districts considered applying this type of efficiency metric to the air district's boundaries. Consistent with the methodology developed by the Regional Targets Advisory Committee (RTAC) as part of SB 375 target setting discussions, the definition of service population for a local air district was amended to include employees as well as residents because the transportation sector is the primary source of project-related GHG emissions; and unlike the state as a whole, people who work in one county or air district may not live in the same air district, city, or county. However, it should be noted that people who live and work within the air district, city, or county would also have other trip ends to services including, schools, retail uses, and parks. Therefore, for an air district, city, or county boundary as a whole, the per capita metric does not include other users of the site. However, a project encompasses a much smaller boundary than an air district, city, or county and for commercial and other non-residential development projects (e.g., parks or schools) the primary user of a site is not the employee but other visitors which depending on the land use may include patients, customers, students, or clients. Therefore, for the purpose of this project, the service population is based on the number of students as the primary users of the site.

Table 12, *GHG Emissions Summary and Significance Evaluation* shows Project-related GHG emissions. Table 12 shows that the Project would exceed the Tier 3 (3,000 $MTCO_2e$) screening threshold, but would not exceed the Tier 4 service population threshold. Project-related GHG emissions typically include emission from construction and operational activities. Construction of the Project would result in direct emissions of CO_2, N_2O, and CH_4 from the operation of construction equipment. Transportation of materials and construction workers to and from the Project site would also result in GHG emissions. Construction activities would be short-term in duration and would cease upon Project completion.

Table 12: GHG Emissions Summary and Significance Evaluation

Emissions Source	CO_2e (Metric Tons Per Year)
Construction (amortized over 30 years)	27
Area Source	0
Energy Source	269
Mobile Source	2,584
Waste	70
Water	74
Total	3,024
Screening Threshold	3,000
Screening Threshold Exceeded?	Yes
Service Population	1,500
Total Per Service Population ($MTCO_2e$/Service Population/year)	**2.0**
Threshold **($MTCO_2e$/Service Population/year)**	3.0
Threshold Exceeded?	**No**
Source: CalEEMod version 2016.3.2; refer to Appendix A.	

Operation of the proposed Project would result in GHG emissions from mobile and operational sources. Mobile sources including vehicle and heavy truck trips to and from the Project site would result primarily in emissions of CO_2 with minor emissions of CH_4 and N_2O. Electricity usage by the Project and indirect usage of electricity for water and wastewater conveyance would result primarily in CO_2 emissions. Disposal of solid waste would result in emissions of methane from the decomposition of waste at landfills coupled with CO_2 emission from the handling and transport of solid waste. These sources combine to define the long-term GHG emissions for the build-out of the proposed Project. As shown in Table 12, Project-related GHG emissions are below the Tier 4 GHG significance threshold for the proposed service population; therefore, impacts are less than significant. Most of the GHG emissions are from off-site mobile sources and indirect electric power generation.

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

Less than Significant. The SCAQMD supports State, federal, and international policies to reduce levels of ozone-depleting gases through its Global Warming Policy and rules, and the proposed Project would comply with the SCAQMD's interim GHG threshold. The proposed Project would comply with the City's General Plan policies and State Building Code provisions designed to reduce GHG emissions. In addition, the proposed Project would comply with all SCAQMD applicable rules and regulations during construction of the operational phase. As indicated above, Project emissions would not exceed the post-2020 service population threshold, and therefore it would not interfere with the State's goals of reducing GHG emission to 1990 levels by the year 2020 as stated in AB 32 and an 80 percent reduction in GHG emissions below 1990 levels by 2050 as stated in Executive Order S-3-05. Therefore, the proposed Project would have a less than significant impact on GHG emissions.

Hazards and Hazardous Materials

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
9. 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?			X	
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?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?			X	
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				X

Methane and Hydrogen Sulfide Potential

Based on the site geology and lack of intense agricultural uses or landfills on the Project site, the potential for generation of methane or hydrogen sulfide is very low.

Radon

Radon is a naturally occurring radioactive gas that can cause lung cancer. San Bernardino County and most of southern and central California is in EPA Radon Zone 2[33]. This zone has a predicted average indoor radon screening level between 2 and 4 picocuries per liter (pCi/L). The EPA recommends that individuals avoid long-term exposure to radon concentrations above 4 picocuries per liter. Based on California Department of Public Health data, the predicted radon levels in the general area contiguous to the Project site is approximately 0.8 pCi/L;[34] therefore, there is a low potential that radon at the Project site exceeds 4 pCi/L.

Fire Hazard

The City of San Bernardino is susceptible to wildland fires due to the steep terrain and highly flammable chaparral vegetation of the foothills of the San Bernardino Mountains and high winds that correspond with seasonal dry periods. The characteristics of the San Bernardino Mountains and winds in the area indicate that large uncontrollable fires on a recurring basis are inevitable. However, as shown on the Fire Hazard Areas Map of the General Plan, the Project site is not located near an Extreme Fire Hazard Area (EFHA), Moderate Fire Hazard Area (MFHA), or City High Fire Hazard Area CHFHA.[35]

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

Less than Significant.

Construction

Both the EPA and the US Department of Transportation (DOT) regulate the transport of hazardous waste and material, including transport via highway. The EPA administers permitting, tracking, reporting, and operations requirements established by the Resource Conservation and Recovery Act. The DOT regulates the transportation of hazardous materials through enforcement of the Hazardous Materials Transportation Act. This act includes requirements for container design and labeling, as well as for driver training. The established regulations are intended to track and manage the safe interstate transportation of hazardous materials and waste. Additionally, State and local agencies enforce the application of these acts and coordinate safety and mitigation responses in the case that accidents involving hazardous materials occur.

[33] Cal-EPA. EPA Map of Radon Zones. Available at https://www.epa.gov/sites/production/files/2014-08/documents/california.pdf. Accessed on March 2019.
[34] California Department of Public Health (CDPH). February 2016. *California Indoor Radon Test Results.* Available at: https://www.cdph.ca.gov/Programs/CEH/DRSEM/CDPH%20Document%20Library/EMB/Radon/Radon%20Test%20Results.pdf. Accessed on March 2019.
[35] General Plan. 2005. Figure S-9, *Fire Hazard Areas.*

Project construction activities may include refueling and minor maintenance of construction equipment on-site, which could lead to minor fuel and oil spills. The use and handling of hazardous materials during construction would occur in accordance with applicable federal, State, and local laws, including California Division of Occupational Safety and Health (Cal/OSHA) requirements. However, all construction activities would be subject to the NPDES permit process that requires the preparation of a Stormwater Pollution Prevention Plan (SWPPP), which would be reviewed and approved by the Santa Ana RWQCB, and the latest industry MBPs. Additionally, the Project site is not included on the list of hazardous waste sites (Cortese List) compiled by the Department of Toxic Substances Control (DTSC) pursuant to Government Code Section 65962.5 and therefore would not release known hazardous materials due to ground disturbing activities.[36] Following the required NPDES process and the implementing the latest industry BMPs, the Project would cause a less than significant impact to the public or the environment due to construction activities.

Operations

Project operations could result in the use, storage, and disposal of hazardous materials. These can include, but are not limited to art supplies, pesticides and fertilizers, and maintenance supplies and equipment (e.g., drain cleaners, floor stripping products, paints, oils, fuels) (U.S. EPA 2006). Additionally, as part of the high school's curriculum, chemicals would be handled for science classes; thus, the proposed charter school must comply with regulations regarding the management, transport, and disposal of hazardous waste in accordance with the EPA's Resource Conservation and Recovery Act and other applicable State and local requirements (EPA 2006, 2018a). With compliance with EPA's Resource Conservation and Recovery Act and MM HAZ-1, the Project would cause a less than significant impact from the routine transport, use, or disposal of hazardous materials.

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

Less than Significant. Refer to Response (a) above.

(c) 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. The H. Frank Dominguez Elementary School is contiguous north of the Project site, at 135 S. Allen Street. As a science and language academy, the proposed Project is not expected to generate hazardous emissions or use large quantities of hazardous materials aside from those required to conduct chemistry classes and typical cleaning solvents, and fuels

[36] Department of Toxic Substances Control (DTSC) EnviroStor. 2019. *Hazardous Waste and Substances Site List.* Available at: https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=san+bernardino. Accessed on June 2019.

required to power lawn mowers and other maintenance equipment. According to the DTSC, the Project site is not a known source of hazardous materials or where a spill or cleanup has previously occurred. Additionally, new school sites are required to be free of contamination or, if the properties were previously contaminated, they must be cleaned up under DTSC's oversight. Because the proposed Project is not documented as a hazardous site, and it is not likely that the school will emit hazardous or acute hazardous materials from common operations; impacts are anticipated to be less than significant.

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

No Impact. The Project site is not included on the list of hazardous waste sites (Cortese List) compiled by the DTSC pursuant to Government Code Section 65962.5. Therefore, the Project would have no impact.

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

Less than Significant. The San Bernardino Airport Land Use Plan is currently being drafted and not available at the time of this report. The Project site is located approximately 2.0 miles west of the San Bernardino International Airport (SBIA) and is not located directly on the airport's flight path. The Federal Aviation Administration (FAA) Regulations Title 14 Part 77 determines restrictions to obstructions and height limitations for structures taller than 200 feet or within 20,000 feet of an airport.

Additionally, the charter school consulted with the California Department of Transportation (Caltrans), Division of Aeronautics, regarding Section 17215 of the California Education Code (EC). In response to the consultation, a letter was provided, in which it states that the airport review confirmed the following:

(a) No Airport Land Use Compatibility Plan (ALUCP) has been prepared for SBD, (b) No SBD noise contour profile is available, and (c) SBIAA uses the Caltrans Handbook as its primary reference source for making airport land-use compatibility decisions. Graphical depictions of Caltrans CCR and Handbook criteria reveal that a small segment (approximately 15%) of the proposed site appears to fall within the Traffic Pattern Zone (Zone 6). However, based on existing air traffic control flow patterns, noise and overflight considerations, flight regulations and other guidelines, the California Department of Transportation (Caltrans), Division of Aeronautics concluded that

the Project site does provide the level of safety suitable for a school and there are no objections to the acquisition and construction of the school at the proposed location.[37]

The school has already complied with the airport review and a positive conclusion was provided for the development of the charter school. Additionally, the Project would be consistent with Section 19.20.015 Noise Standards. Thus, a less than significant impact would occur.

(f) Impair implementation of an emergency response plan or emergency evacuation plan?

Less than Significant. The City of San Bernardino adopted an Emergency Management Plan to identify evacuation routes, emergency facilities, and City personnel and equipment available to effectively deal with emergency situations. No revisions to the adopted Emergency Management Plan would be required as a result of the proposed Project. Access to the Project site would be via five driveways; refer to **Exhibit 10**, *Proposed Project Site Driveways*, for driveway locations. All driveways would allow for emergency vehicle ingress and egress. Design and circulation access would adhere to all applicable requirements from the City and San Bernardino County Fire District. Therefore, impacts to an emergency response plan would be less than significant.

(g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. As outlined above, the Project site is not located in an area mapped for fire risk. Fire hazard areas are located predominately in the foothills of the San Bernardino Mountains. Therefore, the proposed Project would not expose people or structures to a risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. No impact would occur.

[37] California Department of Transportation (Caltrans). July 5, 2019. *Department of Transportation – Division of Aeronautics Letter, included as Appendix I.*

Hydrology and Water Quality

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

A Preliminary Hydrology Calculations Report and Water Quality Management Plan were prepared by Kimley-Horn and Associates for the proposed Project. These technical studies are included in Appendix E and Appendix F, respectively, and the results are summarized herein.

Groundwater and Surface Water

The SBMWD provides domestic water for the City and unincorporated areas of San Bernardino County as well as back-up to the City of Loma Linda. Water service is provided for single-family, multiple-family, commercial, light industrial, governmental, and landscaping purposes. Other water agencies in the planning area include East Valley Water District on the east, Redlands

Mutual, Loma Linda Municipal, Riverside, and Colton water providers to the south, and West San Bernardino and Rialto to the west. Figure U-2 of the City's General Plan shows the service boundaries of the water providers in the planning area.[38] Since the City has no jurisdiction over water supply, transmission, distribution, and storage facilities administered by other entities, this discussion addresses facilities owned and maintained by the City. Groundwater from the Bunker Hill Basin is the primary source of water supply for the SBMWD. It has the capacity to provide 70,000 acre-feet per year of water from groundwater and surface water sources. The basin, similar to a very large underground lake, is replenished naturally by local precipitation and by stream flow from rain and snowmelt from the San Bernardino Mountains. While groundwater is the principal source of supply in the planning area, other sources of water supply include: The State Water Project (SWP), the Santa Ana River, Mill Creek, and Lytle Creek.[39]

Flooding

The site is located in Zone X per the Federal Emergency Management Administration (FEMA) Flood Insurance Rate Map (FIRM) Panel 06071C8682J, dated September 2, 2016. Flood Zone X is defined by FEMA as the area determined to be outside the 500-year flood. No portion of the site is located within the special flood hazard area inundated by the 100-year flood.

(a) Violate water quality or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less than Significant. The California Porter-Cologne Water Quality Control Act (Section 13000 ("Water Quality") et seq., of the California Water Code), and the Federal Water Pollution Control Act Amendment of 1972 (also referred to as the Clean Water Act [CWA]) require comprehensive water quality control plans be developed for all waters within the State of California. The Project site is located within the jurisdiction of the Santa Ana RWQCB.

Construction

Construction of the proposed Project would involve clearing, soil stockpiling, grading, paving, utility installation, building construction, and landscaping activities, which would result in the generation of potential water quality pollutants such as silt, debris, chemicals, paints, and other solvents with the potential to adversely affect water quality. As such, short-term water quality impacts have the potential to occur during construction of the proposed Project in the absence of any protective or avoidance measures. Frontage improvements would include the following:

As part of the proposed Project, new sidewalks will be provided along with new curb and gutters and driveways as applicable along all street frontages. The removal and replacement of half-width improvements for the length of the street frontage on Allen Street and on Valley Street

[38] General Plan. 2005. *Figure U-2, Water Service Area Boundaries.* Available at http://www.sbcity.org/civicax/filebank/blobdload.aspx?blobid=26199, accessed September 2019.
[39] General Plan. 2005. Available at http://www.sbcity.org/civicax/filebank/blobdload.aspx?blobid=26199.

will be performed. Waterman Avenue will receive half-width grinding and overlay improvements. At this time there is no intended utility work with exception of new connections to existing underground facilities.

The proposed Project would disturb more than one acre of land surface and would, therefore, be required to obtain coverage under the NPDES stormwater program. The City of San Bernardino is a co-permittee under San Bernardino County's NPDES Permit (No. CAS618036), and as such is required to adhere to the County-wide NPDES permit requirements. To minimize water quality impacts during construction, construction activities would be required to comply with a SWPPP consistent with the General Permit for Storm Water Discharge Associated with Construction Activity (Construction Activity General Permit). To obtain coverage, the Project Applicant is required to submit a Notice of Intent prior to construction activities and develop and implement an SWPPP and monitoring plan. The SWPPP identifies erosion-control and sediment-control BMPs that would meet or exceed measures required by the Construction Activity General Permit to control potential construction-related pollutants. Erosion-control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap sediment once it has been mobilized. These requirements would ensure that potential project impacts related to soil erosion, siltation, and sedimentation remain less than significant and avoid violation to any water quality standards or waste discharge requirements.

Operations

Currently, there is existing storm drain infrastructure along Waterman Avenue, east of the Project site, but the Project site is not tributary to the existing system. Under existing conditions, stormwater flows in a north-south and south-west direction, discharges into Valley Street and Allen Street, continues south along Allen Street, drains into Twin Creek Channel and ultimately reaches the Santa Ana River. The existing drainage path will be maintained for the proposed development.

The development of the proposed Project would result in an increase of approximately 51 percent of impervious surface which would increase stormwater runoff;[40] however, this runoff would be captured and conveyed through the proposed storm drain system. The Project design incorporates an infiltration basin that will be sized to treat and capture the design capture the volume (DCV), as outlined in the proposed Project's Water Quality Management Plan (WQMP), and to retain the storm water volume required to avoid or minimize impacts downstream. Once the infiltration basin exceeds its capacity, the flows will spill over the emergency overflow spillway and continue flowing south as is the case under the existing site conditions.[41]

[40] Kimley-Horn and Associates. June 2019. *Preliminary Hydrology Report*. (See Appendix E)
[41] Kimley-Horn and Associates. September 2019. *Preliminary Water Quality Management Plan*. (See Appendix F)

The WQMP is a post-construction management program that ensures the ongoing protection of the watershed basin by requiring structural and programmatic controls. The WQMP identifies structural controls (including a contained, on-site wastewater treatment plant) and programmatic controls to minimize, prevent, and/or otherwise appropriately treat stormwater runoff flows before they are discharged from the site. Mandatory compliance with the WQMP would ensure that the proposed Project does not violate any water quality standards or waste discharge requirements during long-term operation; refer to **Table 13**, *Form 5-1 BMP Inspection and Maintenance*.

Table 13: Form 5-1 BMP Inspection and Maintenance

BMP	Responsible Party(s)	Inspection/Maintenance Activities Required	Minimum Frequency of Activities
Litter/Debris Control Program	Owner	Litter shall be picked up, trash enclosure areas shall be swept and cleaned, dumpsters shall be emptied.	Weekly
Catch Basin Inspection Program	Owner	Catch basins shall be inspected to ensure proper operation.	Monthly during rainy season (October-May) and before and after each storm event
Parking Lot Sweeping	Owner	Parking lots must be swept	Quarterly (Minimum), Weekly during rainy season (October-May)
Landscape Management	Owner	Gardening and lawn care practices to prevent landscape waste to exit project site per SC-73	Weekly
Infiltration Basin	Owner	See TC-11 Infiltration Basin O&M information. See Appendix D of the WQMP Report.	See TC-11 Infiltration Basin O&M information.
Source: Kimley-Horn and Associates. September 2019. Preliminary Water Quality Management Plan. (See Appendix F)			

With compliance with the recommended BMPs, water quality impacts associated with long-term operation of the proposed Project would be less than significant and no mitigation would be required.

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

Less than Significant. The proposed Project's potable water supply would be served by the SBMWD. The SBMWD obtains its water supply from the Bunker Hill Groundwater Basin. The proposed Project does not include any uses which involve potable groundwater wells. The proposed Project includes construction and operation of a charter educational facility (NSLA) and a County-owned headstart/preschool facility, which would result in additional impervious surfaces on site. However, the Project would construct a series of storm drains leading to the

proposed catch/infiltration basin located on the southwest corner of the site. Form 4.3-1 Infiltration BMP Feasibility Drainage Area (DA)1 of the WQMP identifies that the infiltration basin does not pose a significant risk for groundwater. Rather, the proposed catch/infiltration basin would recharge groundwater. The proposed Project would not significantly impact local groundwater recharge. Impacts would be less than significant and no mitigation is required.

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

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

Less Than Significant Impact. The site does not include any streams or rivers, which could be altered by the proposed Project. In addition, the proposed on-site detention/infiltration basin would limit the release of stormwater from the site; therefore, minimizing the potential for substantial erosion or siltation to occur on-site or off-site. Additionally, the Project would comply with Policy 9.4.10 (NPDES), Policy 9.4.11 (BMPs), and **Table 13**, *Form 5-1 BMP Inspection and Maintenance,* as referenced in the Geology and Soils Section. Therefore, impacts would be less than significant, and no mitigation is required.

ii) 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. The site does not include any streams or rivers, which could be altered by the proposed Project. In addition, the proposed on-site detention/infiltration basin would be located on the southwest portion of the site, just south of the soccer/track and field, will capture and infiltrate the additional storm water runoff that is generated from the proposed development conveying from north and southeast. Once the infiltration basin exceed their capacity, the flows will spill over the emergency over-flow spillway and continue flowing south as is the case under the existing site conditions. The required design capture volume (DVC) for the Project is 39,262 cubic feet (c.f.) and the volume required to be detained based on the 100-year storm event is 19,166 c.f.

The proposed basins have a total volume of 52,090 c.f., which satisfies the volume requirements for both water quality and storm water mitigation. The proposed development will not increase peak discharges currently exiting the site under the 100-year storm event since the site is a zero-discharge site. [42]

The site will not discharge more runoff than what is being discharged under the existing conditions; therefore, minimizing the potential for flooding to occur on-site or off-site. Therefore, impacts would be less than significant, and no mitigation is required.

[42] Kimley-Horn and Associates. September 2019. *Preliminary Water Quality Management Plan*. (See Appendix F)

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

Less Than Significant Impact. The Project is proposing an infiltration basin for stormwater mitigation. The proposed infiltration basin was sized to treat the DCV, as outlined in the WQMP, and to retain the stormwater volume required to not create any adverse impacts downstream. Once the infiltration basin exceeds its capacity, the flows will spill over the emergency over-flow spillway and continue flowing south as is the case under the existing site conditions. The required DVC for the Project is 34,155 cubic feet (c.f.) and the volume required to be detained based on the 100-year storm event is 7,776 c.f. The proposed basin has a total volume of 47,864 c.f., which satisfies the volume requirements for both water quality and stormwater mitigation. The proposed development will not increase peak discharges currently exiting the site under the 100-year storm event since the site is a zero-discharge site. Therefore, impacts would be less than significant.

(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundations?

Less than Significant Impact. The Project site is located approximately 59 miles inland from the Pacific Ocean. Given the distance from the coast, the potential for the Project site to be inundated by a large, catastrophic tsunami is extremely low. No steep slopes are in the Project vicinity; therefore, the risk of mudflow is insignificant. However, the Project site is identified as being in flood path of the Seven Oaks Dam in the event of the dam's failure. [43] However, FEMA identifies the Project area as Zone X,[44] an area identified as having a 0.2 percent chance of flood. Less than significant impacts would occur.

(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than Significant. The proposed Project's potable water supply would be served by the SBMWD. The SBMWD obtains its water supply from the Bunker Hill Groundwater Basin. The proposed Project does not include any uses which involve potable groundwater wells. The proposed Project includes construction and operation of an educational facility, which would result in additional impervious surfaces on-site. However, the Project would construct storm drains and a catch basin to capture, release, and infiltrate water consistent with City and NPDES permit requirements. Accordingly, the proposed Project would have a less than significant impact.

[43] General Plan. 2005. *Figure S-2, Seven Oaks Damn Inundation Map*.
[44] FEMA. 2016. *Flood Insurance Rate Map*.

Land Use and Planning

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

According to the City's General Plan Land Use and Zoning Map, and as previously stated in Section 2.4, General Plan and Zoning Designations, the Project site currently contains 16 parcels. Eight of the parcels have an "Industrial" General Plan land use designation and an "Office Industrial Park (OIP)" zoning. The additional eight parcels have a "Single-Family Residential" General Plan land use designation and a "Residential Suburban (R-S)" zoning, as designated by the City's Zoning Code. The proposed Project is requesting a General Plan Amendment (GPA) and Zone Change (ZC). The existing "Single-Family Residential and Industrial" General Plan designations are proposed to be amended to "Public/Quasi-Public". Similarly, the existing "Residential Suburban and Office Industrial Park" zoning designations are proposed to be amended to "Public Facility"; refer to **Exhibit 5**, *Existing General Plan Land Use Designation,* **Exhibit 6***, Proposed General Plan Land Use Designation,* **Exhibit 7**, *Existing Zoning Designation,* and **Exhibit 8**, *Proposed Zoning Designation*.

Additionally, Parcel 3, the location of the NSLA facilities, would require a CUP to be consistent with the City's Development Code 19.10.020 General Standards for Special Purpose Zones, which states that any structure located in a Special Purpose zone (except the Open Space zone, wherein all structures are prohibited) shall be subject to an Administrative or Development Permit and shall be:

1. Clearly incidental to the primary use;
2. Sited in a manner sensitive to the existing natural resources and constraints of the land;
3. Subject to demonstrating need and appropriateness;
4. Landscaped in a manner which complements both the immediate setting and surrounding areas;

5. Subject to demonstrating the need for exterior lighting, and if justified shall be appropriately located, directed, and shielded from surrounding properties and public rights-of-way;

6. Subject to a visual analysis relating building proportions, massing, height, and setbacks to preserve and enhance the scenic character of the area; and

7. Compatible and in harmony with surrounding development and land use designations.

The San Bernardino County Head Start/Preschool Facility, as part of the SBCPSD and as an independent agency, is not required to undergo the same CUP requirements as the NSLA facilities. Thus, the construction of the head start/preschool facilities do not require a CUP.

(a) Physically divide an established community?

Less than Significant. The general Project vicinity is developed and no physical barriers exist. The Project site does not serve as a barrier to divide the community, nor does it serve as a connection for the existing community. The Project site is vacant and currently serves as mostly undeveloped land that is used for storing dirt. Once the proposed Project is fully built, it will generally blend in with the mix of surrounding uses and would not physically divide an established community. Therefore, the proposed Project would have a less than significant impact.

(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?

Less than Significant. The proposed Project requires a general plan amendment and zone change, in addition to a CUP for the development of charter school and an administrative/development permit to provide educational services. The Project site is currently zoned

Residential Suburban (R-S) and Office Industrial Park (OIP) and the Project is requesting a general plan amendment and zone change to Public Facilities. With the approval of the Project, the Project would be consistent with the underlying zoning and General Plan designations and would conflict with applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project. A less than significant impact would occur.

Mineral Resources

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
12. 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?			X	
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?			X	

A large portion of the City of San Bernardino is designated as Mineral Resource Zone-2 (MRZ-2) and smaller portions are designated as MRZ-1. Other areas of the City are not mapped. The General Plan designates MRZ-2 zones as having a high potential for mineral resources.[45] However, the California Data Basin for Mineral Resources, which get its data from the California Geological Survey, does not designate the Project site as site containing mineral resources.[46] As such, the Project site is not designated for mineral resource recovery and does not contain any known mineral resources and is not used for mining or mineral production.

(a & b) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? And 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. The Surface Mining and Reclamation Act of 1975 (SMARA) requires classification of land into MRZs according to the known or inferred mineral potential of the area. Under SMARA, areas are categorized into MRZs as follows:

MRZ-1 Areas where the available geologic information indicates no significant mineral deposits or a minimal likelihood of significant mineral deposits.

MRZ-2 Areas where the available geologic information indicates that there are significant mineral deposits or that there is a likelihood of significant mineral deposits. However, the significance of the deposit is undetermined.

[45] General Plan. 2005. *Mineral Resources, Figure NRC-3, page 12-15.* Available at http://www.sbcity.org/civicax/filebank/blobdload.aspx?blobid=26199. Accessed on September 2019.
[46] California Mineral Resources. 2019. Available at: https://databasin.org/maps/new#datasets=f2985196ca6b45cf8f2ad604beb95b34. Accessed on March 2019.

MRZ-3 Areas where the available geologic information indicates that mineral deposits are inferred to exist; however, the significance of the deposit is undetermined.

MRZ-4 Areas where there is not enough information available to determine the presence or absence of mineral deposits.

The Project site is within an MRZ-2, meaning significant mineral deposits or likelihood of significant mineral deposits exist; however, the significance of the deposit is undetermined. Implementation of the proposed Project would not deplete mineral deposits or involve mining activities. Furthermore, the Project site is not located in an area identified as a locally important mineral resource recovery site and is not a mining area. Therefore, the proposed Project would not result in the loss of availability of a known mineral resource. Impacts would be less than significant.

Noise

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

Noise is generally defined as loud, unpleasant, unexpected, or undesired sound that is typically associated with human activity and that interferes with or disrupts normal activities. The human environment is generally characterized by a certain consistent noise level that varies by area. This is called ambient, or background noise. Although exposure to high noise levels has been demonstrated to cause hearing loss, the principal human response to environmental noise is annoyance. The response of individuals to similar noise events is diverse and influenced by the type of noise, perceived importance of the noise and its appropriateness in the setting; time of day and type of activity during which the noise occurs, and sensitivity of the individual.

Sound is a physical phenomenon consisting of vibrations that travel through a medium, such as air, and are sensed by the human ear. Sound is generally characterized by several variables, including frequency and intensity. Frequency describes the sound's pitch and is measured in cycles per second, or hertz (Hz). Intensity describes the sound's loudness and is measured in decibels (dB). A sound level of 0 dB is approximately the threshold of human hearing and is barely audible under extremely quiet listening conditions. Normal speech has a sound level of approximately 60 dB. Sound levels above about 120 dB begin to be felt inside the human ear as discomfort and eventually as pain at still higher levels. The minimum change in the sound level of individual events that an average human ear can detect is about 3 dB. Decibels are measured using a logarithmic scale; thus, the average person perceives a change in sound level of about 10

dB as a doubling (or halving) of the sound's loudness. This relation holds true for sounds of any loudness.

The normal human ear can detect sounds that range in frequency from about 20 Hz to 20,000 Hz. However, all sounds in this wide range of frequencies are not heard equally well by the human ear, which is most sensitive to frequencies in the range of 1,000 Hz to 4,000 Hz. This frequency dependence can be taken into account by applying a correction to each frequency range to approximate the human ear's sensitivity within each range. This is called A-weighting and is commonly used in measurements of community environmental noise. The A-weighted sound pressure level (abbreviated as dBA) is the sound level with the "A-weighting" frequency correction. In practice, the level of a noise source is conveniently measured using a sound level meter that includes a filter corresponding to the dBA curve.

Because community noise fluctuates over time, a single measure called the Equivalent Sound Level (L_{eq}) is often used to describe the time-varying character of community noise. The L_{eq} is the energy-averaged A-weighted sound level during a measured time interval and is equal to the level of a continuous steady sound containing the same total acoustical energy over the averaging time period as the actual time-varying sound. It is often desirable to know the acoustic range of the noise source being measured. This is accomplished through the L_{max} and L_{min} indicators, which represent the root-mean-square maximum and minimum noise levels obtained during the measurement interval. The L_{min} value obtained for a particular monitoring location is often called the "acoustic floor" for that location.

To describe the time-varying character of environmental noise, the statistical noise descriptors L_{10}, L_{50}, and L_{90} are commonly used. They are the noise levels equaled or exceeded during 10, 50, and 90 percent of a stated time, respectively. Sound levels associated with L_{10} typically describe transient or short-term events, whereas levels associated with L_{90} describe the steady-state (or most prevalent) noise conditions.

Another sound measure known as the Community Noise Equivalent Level (CNEL) is an adjusted average A-weighted sound level for a 24-hour day. It is calculated by adding a 5 dB adjustment to sound levels during evening hours (7:00 p.m. to 10:00 p.m.) and a 10 dB adjustment to sound levels during nighttime hours (10:00 p.m. to 7:00 a.m.). These adjustments compensate for the increased sensitivity to noise during the typically quieter evening and nighttime hours. The CNEL is used by the State of California and the City to evaluate land use compatibility with respect to transportation noise.

The City's Noise Ordinance (19.20.030.15 of the Development Code) specifies that no exterior noise level shall exceed 65 dBA and no interior noise level shall exceed 45 dBA in residential areas. The City does not specify noise level limits for uses other than residential.

Additionally, the City's Municipal Code (8.54.020 of the Municipal Code) prohibits the operation or use between the hours of 10:00 p.m. and 8:00 a.m. of any pile driver, steam shovel, pneumatic hammers, derrick, steam or electric hoist, power-driven saw, or any other tool or apparatus, the use of which is attended by loud and excessive noise, except with the approval of the City.

Existing Noise Environment

Some land uses are considered sensitive to noise. Noise-sensitive receptors are associated with indoor or outdoor activities subject to stress or significant interference from noise, such as residential dwellings, transient lodging, dormitories, hospitals, educational facilities, public assembly facilities, amphitheaters, playgrounds, congregate care facilities, childcare facilities, and libraries. Industrial and commercial land uses are generally not considered sensitive to noise.

The Project site is in a predominately residential area, with more industrial and commercial land uses to the east of the Project. Currently, there are no dwelling units on the Project site. The primary sources of noise within the Project area are vehicular traffic including automobiles, trucks, buses, and motorcycles. Other sources of noise include stationary noise sources associated with nearby industrial activity. The San Bernardino International Airport is located approximately 1.2 miles east of the Project site.

Existing Mobile Noise Sources

Existing roadway noise levels were calculated for the roadway segments in the Project vicinity. This task was accomplished using the Federal Highway Administration (FHWA) Highway Traffic Noise Prediction Model (FHWA-RD-77-108) and existing traffic volumes from the Project *Traffic Impact Study* (Kimley-Horn, 2019). The noise prediction model calculates the average noise level at specific locations based on traffic volumes, average speeds, roadway geometry, and site environmental conditions. The average vehicle noise rates (also referred to as energy rates) used in the FHWA model have been modified to reflect average vehicle noise rates identified for California by the California Department of Transportation (Caltrans). The Caltrans data indicates that California automobile noise is 0.8 to 1.0 dBA higher than national levels and that medium and heavy truck noise is 0.3 to 3.0 dBA lower than national levels. The average daily noise levels along roadway segments in proximity to the Project site are included in **Table 14**, *Existing Traffic Noise Levels*.

Table 14: Existing Traffic Noise Levels

Roadway	Segment	ADT	dBA CNEL 100 Feet from Roadway Centerline
Waterman Avenue	5th Street to 2nd Street	21,134	65.9
	2nd Street to Valley Street	20,787	66.9
	Valley Street to Mill Street	20,879	66.9
	Mill Street to Orange Show Road	22,221	67.0
2nd Street	I-215 NB Ramps to E Street	21,445	64.7
	E Street to Waterman Avenue	9,499	61.1
Mill Street	I-215 NB Ramps to E Street	16,422	64.6
	E Street to Waterman Avenue	18,846	65.2
	East of Waterman Avenue	15,336	65.4
Notes: ADT=average daily trips; dBA=A-weighted decibels; CNEL=community noise equivalent level; based on traffic data within the Traffic Impact Study for the proposed Project, prepared by Kimley-Horn, 2019; refer to Appendix D for traffic noise modeling assumptions and results.			
Source: Kimley-Horn and Associates, 2019. (See Appendix D)			

Noise Measurements

Noise level measurements in the vicinity of the Project site were made to establish current baseline noise levels. Sites were selected around the perimeter of the Project site. Ten-minute measurements were taken between 9:30 a.m. and 10:00 a.m. The measured noise levels range between 55.8 dBA L_{eq} and 58.9 dBA L_{eq}; refer to **Table 15**, *Noise Measurements*. Short-term (L_{eq}) measurements are considered representative of the noise levels throughout the day. Measurements were taken during off-peak traffic hours to characterize baseline noise levels with without exposure to heavy traffic or noise-generating activities.

Table 15: Noise Measurements

Site Number	Description	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)	Time
1	Eastside of Meadowbrook Recreation Park on South Allen Street	58.9	43.1	76.7	9:31 a.m.
2	South of 238 South Allen Street	55.8	41.5	75.1	9:45 a.m.
3	Southwest corner of East Valley Street and South Allen Street	58.3	40.8	80.4	9:59 a.m.
Source: Noise measurements taken by Kimley-Horn on July 10, 2019. (See Appendix D)					

The ambient noise levels in the Project study area are dominated by the transportation-related noise associated with the arterial transportation network, and existing background industrial land use activities. Meteorological conditions were clear skies, warm temperatures, with light wind speeds (0 to 5 miles per hour), and low humidity. Noise monitoring equipment used for the ambient noise survey consisted of a Larson Davis SoundExpert LxT sound level meter. The monitoring equipment complies with applicable requirements of the American National Standards Institute (ANSI) for Type I sound level meters. Refer to Appendix D, Noise Data, for the results of the field measurements.

Regulatory Setting

City of San Bernardino

Figure N-1 of City of San Bernardino Noise Element provides noise criteria to evaluate the land use compatibility of transportation-related noise. The compatibility criteria indicate that school land uses, such as the Project, are considered normally acceptable with noise levels below 70 dBA CNEL and conditionally acceptable with noise levels of less than 80 dBA CNEL. Residential land uses are considered normally acceptable with noise levels below 60 dBA CNEL and conditionally acceptable with noise levels of less than 70 dBA CNEL.

Table N-3 of the City of San Bernardino General Plan Noise Element identifies a maximum allowable exterior noise level of 65 dBA CNEL and an interior noise level limit of 45 dBA CNEL for new residential developments. While the City specifically identifies an exterior noise level limit for noise-sensitive residential land uses such as hotels, hospitals, schools, and parks, the City of San Bernardino does not maintain exterior noise standards for non-noise sensitive land uses such as office, retail, manufacturing, utilities, agriculture, and industrial.

The City maintains several policies in the Municipal Code Noise Control Ordinance (Chapter 8.54) to control the negative effects of nuisance noise, but it does not identify specific exterior noise level limits. However, the policies in the Municipal Code Development Code, Chapter 19.20, Property Development Standards contain the exterior and interior noise level standards for residential land uses.

Municipal Code Section 8.54.060 states when such noises are an accompaniment and effect of a lawful business, commercial or industrial enterprise carried on in an area zoned for that purpose…these activities shall be exempt (Section 8.54.060(B)). However, due to the Project's proximity to residential land uses, located west of the Project site boundary, Development Code Section 19.20.030.15(A), limits the operational stationary-source noise from the proposed Project to an exterior noise level of 65 dBA L_{eq} (1-hr).

Section 8.54.070 (Disturbance s from Construction Activity) of the City's Noise Control Ordinance states that no person shall be engaged or employed, or cause any person to be engaged or employed, in any work of construction, erection, alteration, repair, addition, movement, demolition, or improvement to any building or structure except within the hours of 7:00 a.m. and 8:00 p.m. While the City establishes limits to the hours during which construction activity may take place, it does not identify specific noise level limits for construction noise levels.

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

Less than Significant with Mitigation.

Short-Term Construction Impacts

Construction of the proposed Project would include demolition, site preparation, grading, building construction, paving, and architectural coating. Construction activities, such as movement of equipment and workers, would also cause increased noise along access routes to and from the site. Construction noise would be acoustically dispersed throughout the Project site and would not be concentrated in one area near adjacent sensitive uses.

To evaluate whether the Project would generate a substantial periodic increase in short-term noise levels at off-site sensitive receiver locations, a construction-related noise level threshold was adopted from the Criteria for Recommended Standard: Occupational Noise Exposure prepared by the National Institute for Occupational Safety and Health (NIOSH). NIOSH identifies a noise level threshold based on the duration of exposure to the source. The construction-related noise level threshold starts at 85 dBA for more than 8 hours per day, and for every 3-dBA increase, the exposure time is cut in half. This results in noise level thresholds of 88 dBA for more than four hours per day, 92 dBA for more than 1 hour per day, 96 dBA for more than 30 minutes per day, and up to 100 dBA for more than 15 minutes per day. For the purposes of this analysis, the lowest, more conservative construction noise level threshold of 85 dBA L_{eq} for more than 8 hours per day would be used as an acceptable threshold for construction noise at the nearby sensitive receiver locations. Since this construction-related noise level threshold represents the energy average of the noise source over a given time period, they are expressed as L_{eq} noise levels. Therefore, the noise level threshold of 85 dBA L_{eq} over a period of eight hours or more is used to evaluate the potential Project-related construction noise level impacts at the nearby sensitive receiver locations.

Maximum noise levels generated by construction equipment are shown in **Table 16**, *Maximum Noise Levels Generated by Construction Equipment*. It should be noted that the noise levels identified in Table 16 are maximum sound levels (L_{max}), which are the highest individual sound occurring at an individual time period. Operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be due to random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts).

Table 16: Maximum Noise Levels Generated by Construction Equipment

Equipment	Acoustical Use Factor	L_{max} at 50 Feet (dBA)	L_{max} at 100 Feet (dBA)
Concrete Saw	20	90	84
Crane	16	81	75
Concrete Mixer Truck	40	79	73
Backhoe	40	78	72
Dozer	40	82	76
Excavator	40	81	75
Forklift	40	78	72
Paver	50	77	71
Roller	20	80	74
Tractor	40	84	78
Water Truck	40	80	74
Grader	40	85	79
General Industrial Equipment	50	85	79
Notes: The Acoustical Use Factor (percent) estimates the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation.			
Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, 2018. [1] *2006*			

Sensitive receptors closest to the project site include residences located approximately 100 feet to the west of the construction area. These sensitive receptors may be exposed to elevated noise levels during Project construction. However, construction noise would be acoustically dispersed throughout the project site and not concentrated in one area near surrounding sensitive uses. As shown in Table 16, maximum construction equipment noise levels would not exceed 84 dBA L_{max} at 100 feet. Therefore, construction noise would not exceed the 85 dBA L_{eq} (over an eight-hour period) standard. It should be noted that L_{max} levels are considered worst-case and these noise levels would be lower when averaged over an eight-hour period.

The City's Noise Ordinance does not establish quantitative construction noise standards. Instead, the Noise Ordinance has established allowable hours of construction. Section 8.54.070 of the City's Municipal Code exempts noise associated with construction provided that construction activities do not take place between the hours of 8:00 p.m. and 7:00 a.m. The construction contractor would be required to comply with noise regulations prescribing the hours allowed for construction activity identified in Section 8.54.070 of the City's Municipal Code. Additionally, implementation of MM NOI-1 and NOI-2 would further minimize impacts from construction noise as it requires construction equipment to be equipped with properly operating and maintained mufflers and other state-required noise attenuation devices as well as requiring staging areas to be located away from sensitive receptors. With implementation of MM N-1, construction noise impacts would be less than significant.

Long-Term Operational Impacts

Implementation of the proposed Project would create new sources of noise in the Project vicinity. The major noise sources associated with the Project that would potentially impact existing and

future nearby residences include recreational activities, mechanical equipment (i.e. heating, ventilation, and air conditioners [HVAC]); parking areas (i.e. car door slamming, car radios, engine start-up, and car pass-by); and off-site traffic noise.

Recreational Noise

The outdoor recreational areas proposed for the Project would include a soccer and track field and four basketball courts on an asphalt playground. The recreational uses would include bleachers and designated spectator areas, but no public-address system.

- *Soccer and Track Field*. The soccer and track field would likely be utilized for both pick-up games and organized events. The peak time for activity on the soccer field would be between 3:30 p.m. and 7:00 p.m. For soccer games, the focal point is variable, with considerable excitement occurring when the ball is near either goal, but with the sound of the players spread out over the field and the sounds of spectators spread out along the sidelines. Noise sources associated with soccer events would primarily consist of occasional shouting and cheering of the players and spectators during the contests and practices. Noise from proposed patrons (athletes and spectators at soccer fields during games) typically generate 66 dBA at 50 feet. It should be noted that this reference noise level is conservative as it is for a competitive organized sporting event with a crowd or audience.
- *Basketball Courts*. The basketball courts would be included for spontaneous sports play, and noise levels from these areas would not include loudspeakers. Noise generated from the sports areas would consist of people conversing or yelling intermittently. Typical noise levels from basketball courts range from 59 to 62 dBA at 50 feet from the center of activity. These reference sound levels include ball dribbling, shots against the backboard and shouts from the players. The proposed outdoor half-courts would be for recreational play and would not include spectator or crowd noise.

The City's exterior noise standards for residences are 65 dBA. It is not anticipated that recreational noise levels would exceed the City's standards at the existing single-family residences to the west given the distance from the noise sources. The residences are located approximately 140 feet to the west from the edge of the proposed soccer field and 620 feet west of the basketball courts. At these distances soccer and basketball noise would attenuate to 57 dBA and 40 dBA, respectively. Given the anticipated noise levels from these recreational activities and their distance from sensitive receptors, recreational noise would not cause exterior noise levels to exceed 65 dBA at sensitive receptors. Therefore, impacts would be less than significant.

Mechanical Noise

Typically, mechanical equipment noise is 55 dBA at 50 feet from the source. The nearest sensitive receptors, residential uses, are located approximately 100 feet west of the closest proposed building. HVAC units would be included on the roof of the structure and would be located toward the center of the structure and be located behind a parapet. Noise attenuation would occur due to the housing structure and distance from the nearest sensitive receptors. Thus, the proposed Project would likely not result in additional noise impacts to nearby receptors from HVAC units, and the nearest receptors would not be directly exposed to substantial noise from on-site mechanical equipment. Impacts in this regard would be less than significant.

Traffic Noise Impacts

According to the Traffic Impact Analysis, the Project would generate 2,182 average daily trips, which would result in noise increases on Project area roadways. In general, traffic noise increase of less than 3 dBA is barely perceptible to people, while a 5-dBA increase is readily noticeable (Caltrans, 2009). Generally, traffic volumes on project area roadways would have to approximately double for the resulting traffic noise levels to increase by 3 dBA. Therefore, permanent increases in ambient noise levels of less than 3 dBA are considered to be less than significant.

Traffic noise levels for roadways primarily affected by the proposed Project were calculated using the FHWA's Highway Noise Prediction Model (FHWA-RD-77-108). Traffic noise modeling was conducted for conditions with and without the Project, based on traffic volumes obtained from the Project *Traffic Impact Study* (Kimley-Horn 2019).

Table 17, *Horizon Year Project Traffic Noise Levels* analyzes traffic noise in the Horizon Year (2040). As shown in Table 17, the increase from "Without Project" noise levels would be less than 3 dBA along all roadway segments listed in the *Traffic Impact Study*. As shown in Table 17, the proposed Project's contributions to off-site roadway noise increases would not cause any significant impacts to any existing or future sensitives noise receptors. Due to the negligible and imperceptible change in noise levels, operational noise impacts would be less than significant.

Table 17: Horizon Year Project Traffic Noise Levels

Roadway	Segment	Horizon Year Without Project Noise Level (dBA CNEL)	Horizon Year With Project Noise Level (dBA CNEL)	Change	Significant Impacts
Waterman Avenue	5th Street to 2nd Street	66.7	66.9	0.2	No
	2nd Street to Valley Street	68.1	68.4	0.3	No
	Valley Street to Mill Street	68.1	68.4	0.3	No
	Mill Street to Orange Show Road	68.0	68.3	0.3	No
2nd Street	I-215 NB Ramps to E Street	65.3	65.5	0.2	No
	E Street to Waterman Avenue	62.3	62.7	0.4	No
Mill Street	I-215 NB Ramps to E Street	66.0	66.2	0.2	No
	E Street to Waterman Avenue	67.8	68.0	0.2	No
	East of Waterman Avenue	67.7	67.7	0.0	No
Notes: ADT=average daily trips; dBA=A-weighted decibels; CNEL=community noise equivalent level; refer to Appendix D for traffic noise modeling assumptions and results.					
Source: Kimley-Horn and Associates, *Traffic Impact* Study, 2019. (See Appendix D)					

Mitigation Measures

MM NOI-1 During all project site excavation and grading, the construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with the manufacturers' standards. The construction contractors shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors (residences) nearest the Project site.

(b) Generation of excessive ground borne vibration or ground borne noise levels?

Less than Significant. Project construction can generate varying degrees of ground-borne vibration, depending on the construction procedure and the construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Ground-borne vibrations from construction activities rarely reach levels that damage structures.

The Federal Transit Administration (FTA) has published standard vibration velocities for construction equipment operations. In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.20 inches per second) appears to be conservative. The types of construction vibration impact include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. Typical

vibration produced by construction equipment is illustrated in **Table 18**, *Typical Vibration Levels for Construction Equipment*.

Table 18: Typical Vibration Levels for Construction Equipment

Equipment	Approximate Peak Particle Velocity at Distance (Inches Per Second)		
	25 Feet	50 Feet	100 Feet
Large Bulldozer	0.089	0.0315	0.0111
Loaded Trucks	0.076	0.0269	0.0095
Small Bulldozer	0.003	0.0011	0.0004
Jackhammer	0.035	0.0124	0.0044
Vibratory Compactor	0.210	0.0742	0.0263
Notes: Calculated using the following formula: $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$; where PPV_{equip}= the peak particle velocity in inches per second of the equipment adjusted for the distance; PPV_{ref}= the reference vibration level in inches per second from Table 7-4 of the FTA *Transit Noise and Vibration Impact Assessment Manual;* D=distance from equipment to receiver.			
Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018. (See Appendix D)			

Ground-borne vibration decreases rapidly with distance. The proposed Project would not require pile driving. As indicated in Table 18, based on the FTA data, vibration velocities from typical heavy construction equipment operations that would be used during Project construction range from 0.003 to 0.210 inch-per-second peak particle velocity (PPV) at 25 feet from the source of activity. As noted in Table 18, vibration at 50 feet would range from 0.0011 to 0.0742 PPV. Construction activities would occur as close as approximately 100 feet from the nearest adjacent building. Therefore, vibration from construction activities experienced at the nearest adjacent building would be expected to be below the 0.20 inch-per-second PPV significance threshold. Thus, a less than significant impact would occur in this regard.

Additionally, Project operations associated with the proposed school use would not generate ground-borne vibration that could be felt at surrounding uses. Additionally, operational vibration would also be less than significant; no major equipment that would be capable of transmitting vibrations beyond the property boundaries is envisioned, and the rubber-tired heavy and medium trucks and automobiles associated with Project operations would not create vibration levels higher than already experienced along the adjacent arterial roadways. Less than significant impacts would occur in this regard.

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

Less than Significant. The San Bernardino International Airport is located approximately 1.2 miles east of the Project site. The Project site is located outside of the 65 dBA CNEL noise level contour

boundary of the airport.[47] Table N-3 of the City's *General Plan Noise Element* indicates that any school classrooms or playgrounds of the Project must satisfy an exterior noise level of 65 dBA CNEL and an interior noise level standard of 45 dBA CNEL. However, Figure N-1 in the City's *General Plan Noise Element* specifies that the Project school land use is considered normally acceptable with community noise up to 70 dBA CNEL. No exterior or interior noise mitigation is required to satisfy the City's *General Plan Noise Element* policies. Further, standard building construction typically provides up to 25 dBA CNEL of attenuation, which would reduce the interior noise levels within the building at the project site to satisfy the 45 dBA CNEL interior noise level standard of the City's *General Plan Noise Element*.

Additionally, the Project has also been reviewed by the California Department of Transportation (Caltrans) Division of Aeronautics in accordance with Title 21, California Code of Regulations (CCR) Section 3570 and the California Airport Land Use Planning Handbook to determine where the proposed school site is located relative to flight paths and aircraft generated noise. Caltrans determined that based on existing air traffic control flow patterns, noise and overflight considerations, flight regulations and other guidelines, that the Project site provides the level of safety suitable for a school.[48] Therefore, impacts would be less than significant.

[47] San Bernardino International Airport Authority, *San Bernardino International Airport, Airport Layout Plan Narrative Report*, November 2010.

[48] California Department of Transportation (Caltrans). July 5, 2019. *Department of Transportation – Division of Aeronautics Letter, included as Appendix I.*

Population and Housing

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

Environmental Setting

According to the California Department of Finance (DOF), in 2018, the City of San Bernardino had a population of 221,130 residents with approximately 65,677 homes.[49] The vacancy rate for housing in the City is estimated at six percent.

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

Less than Significant. The proposed Project includes the development of a charter school and head start/preschool facility. It does not propose any type of residential development. Project implementation would meet the demands of projected population growth in the area by providing future accommodation for students. Project related construction would be a source of short-term employment, but it is anticipated that construction workers would be sourced from within or surrounding communities. Long-term employment for teachers and school staff is not anticipated to create significant population growth. The Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) regional employment by industry sector forecast, forecasted that educational services will decrease from 8.9 percent in 2015 to 8.8 percent by 2040.[50] It is anticipated that the Project would create approximately 172 new educational employment opportunities (staff), plus any additional employees required for maintenance and support purposes. The creation of the new jobs will help offset the educational jobs trends. It is not anticipated that the proposed

[49] California Department of Finance (DOF). 2018. *Report E-5 Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011-2018, with 2010 Benchmark.* Available at: http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/. Accessed on March 2019.

[50] SCAG. 2015. *RTP/SCS 2016-2040.* Available at http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx, accessed on September 2019.

Project will induce substantial population growth in the area. A less than significant impact would occur.

(b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The proposed Project site is currently vacant. No evictions or displacement of people or housing is anticipated due to the development of the proposed Project. As a result, the construction of replacement housing would not be necessary. No impact would occur.

Public Services

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
15. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physical 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:				
a) Fire protection?			X	
b) Police protection?			X	
c) Schools?				X
d) Parks?				X
e) Other public facilities?				X

(a) Fire Protection?

Less than Significant. San Bernardino County Fire East Valley Division provides fire protection services to the City, inclusive of the Project site. The closest fire stations to the Project site are Station #221 at 200 E. 3rd Street, located approximately 0.5 miles north and Station #231 located at 450 East Vanderbilt Way, approximately 2.0 miles south of the Project site. An increase of fire protection services is anticipated to occur once the Project is built out as the site is currently vacant. However, the Project will be constructed to meet the current CBC requirements and the Project is subject to fire suppression development impact fees and other standards and conditions required by the City and County Fire. Additionally, fire protection ingress and egress will be available via Driveways 1 through 5. Furthermore, the proposed Project site's internal circulation would allow County Fire approved access. Impacts on fire services is anticipated to be less than significant.

(b) Police Protection?

Less than Significant. Police protection services would be provided by the City of San Bernardino Police Department (SBPD). The Police Department has 225 sworn officers and 150 non-sworn employees. The closest police station is located at 710 North D Street, approximately 0.4 miles northwest of the Project site. The Project is in an urbanized area and would be required to adhere to all standards and conditions required by the City and the SBPD, including the payment of impact fees. Additionally, adherence to conditions and standards identified by the City and the SBPD are required of all development within the City. While the Project could increase the need

for police protection, it would not require the construction of new facilities to maintain acceptable service ratios, response times, or other performance objectives. With adherence to conditions and standards identified by the City and the SBPD, and payment of impact fees, the proposed Project would result in a less than significant impact on police protection.

(c) Schools?

No Impact. The impact of providing school facilities on this site is addressed throughout this IS/MND. A net increase in school facilities would result. Therefore, the proposed Project would not increase the need for the construction of additional school facilities. No significant impact to school services or facilities would occur.

(d) Parks?

No Impact. The proposed Project is a charter school and does not include a residential component that would induce population growth or the need for parks. The Project will provide private recreational space for students which would not be accessible to the general public. Therefore, impacts would be less than significant.

(e) Other public facilities?

No Impact. The proposed Project would not result in or induce significant population growth because the proposed Project does not propose residential units that could introduce new population in the area; rather, the Project is proposing an educational public facility to provide services to existing students, as well as new students from within and neighboring cities; therefore, no impacts to other public facilities would occur from Project implementation.

Recreation

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
16. RECREATION. Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X

The City of San Bernardino Parks, Recreation & Community Services Department is responsible for the development, maintenance, and operation of City facilities. The Department offers 38 parks (includes open spaces and ballfields), 31 playground areas and several park locations with walking tracks for your recreational activities.

(a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. See Response (b), below.

(b) 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 does not involve residential development and as such would not increase the use of existing neighborhood and regional parks or other recreational facilities. The Project would create school recreational facilities that would serve students and community members associated with the charter school. No adverse physical effects on the environment are anticipated from Project implementation. No impacts would occur.

Transportation

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
17. TRANSPORTATION. Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?		X		
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.4, subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
d) Result in inadequate emergency access?			X	

Existing Street System

Regional access to the site is provided primarily via the Interstate 215 (I-215) Freeway, located approximately 1.0 mile to the west of the Project site. In addition, the I-10 Freeway is located approximately 2.5 miles to the south of the site. A description of the roadways surrounding the Project site is provided below:

Waterman Avenue is a north-south divided roadway that provides two to three lanes in each direction. The posted speed limit is 45 miles per hour (mph) and on-street parking is prohibited on both sides. Waterman Avenue is designated as a Major Arterial in the City of San Bernardino Circulation Plan. Waterman Avenue would provide access to the project site via a right-in-right-out only driveway.

Allen Street is a north-south roadway with 1 lane in each direction. On-street parking is permitted on both sides. Allen Street would provide access to the project site via three driveways and is designated as a local street in the City of San Bernardino Circulation Plan.

E Street is a north-south roadway with 1 to 2 lanes in each direction, divided by designated bus lanes (one in each direction) for the OmniTrans sbX Green Line bus service. The posted speed limit is 40 mph and on-street parking is prohibited on both sides. E Street is designated as Major Arterial in the City of San Bernardino Circulation Plan.

2nd Street is an east-west divided roadway that provides two lanes in each direction. The posted speed limit is 35 mph and parking is permitted on various segments in the Project area. 2nd Street is classified as a Major Arterial in the City of San Bernardino Circulation Plan.

Rialto Avenue is an east-west divided roadway that provides two lanes in each direction. The posted speed limit is 35 mph and on-street parking is permitted between Sierra Way and Waterman Avenue. Rialto Avenue is classified as a Secondary Arterial in the City of San Bernardino Circulation Plan.

Valley Street is an east-west roadway with 1 lane in each direction. On-street parking is permitted on both sides. Valley Street would provide access to the project site via a full-movement driveway and is designated as a local street in the City of San Bernardino Circulation Plan.

Mill Street is an east-west divided roadway that provides two lanes in each direction. The posted speed limit is 35 mph and on-street parking is prohibited on both sides. Mill Street is classified as a Major Arterial in the City of San Bernardino Circulation Plan.

Central Avenue is an east-west roadway that provides two lanes in each direction. The posted speed limit is 40 mph and on-street parking is prohibited on both sides. Central Avenue is classified as a Secondary Arterial in the City of San Bernardino Circulation Plan.

Orange Show Road is an east-west roadway that provides two lanes in each direction. The posted speed limit is 50 mph in the project vicinity and on-street parking is prohibited on both sides. Orange Show Road is classified as a Major Arterial in the City of San Bernardino Circulation Plan.

Existing Transit Service

Transit service to the Project area is provided by OmniTrans, which serves the City of San Bernardino and surrounding cities. The nearest OmniTrans bus stops to the Project site are located at the intersections of Waterman Avenue at 2nd Street located approximately 0.25 miles north, Waterman Avenue at Mill Street located approximately 0.25 miles south, and Sierra Way at Rialto Avenue located approximately 0.25 miles northwest. Descriptions of the bus routes serving the Project area are provided below:

sbX Green Line is a rapid transit express bus service that operates between the City of Loma Linda and the City of San Bernardino, traveling along E Street in dedicated bus lanes. The sbX Green Line operates on weekdays from approximately 5:00 AM to 11:00 PM, with service every 10 minutes during peak hours and every 15 minutes during off-peak hours; and Saturdays from approximately 6:20 am to 9:15 pm, with service every 20 minutes.

OmniTrans Route 2 operates between the City of Loma Linda and the City of San Bernardino, traveling through San Bernardino along E Street in the Project vicinity. Route 2 operates on

weekdays from approximately 4:30 AM to 11:00 PM with approximately 1-hour headways (the time between bus arrivals), on Saturdays from approximately 6:05 AM to 9:50 PM with approximately 1-hour headways, and on Sundays from approximately 6:30 AM to 8:15 PM with approximately 30-minute headways.

OmniTrans Route 5 operates in the City of San Bernardino, traveling along Waterman Avenue in the Project vicinity. Route 5 operates on weekdays from approximately 4:40 AM to 10:45 PM with approximately 30-minute headways, Saturdays from approximately 6:30 AM to 8:30 PM with 1-hour headways, and Sundays from approximately 6:30 AM to 7:30 PM with 1-hour headways.

OmniTrans Route 7 operates in the City of San Bernardino, traveling along Rialto Avenue in the Project vicinity. Route 7 operates on weekdays from approximately 5:50 AM to 10:00 PM with approximately 30-minute headways, Saturdays from approximately 6:50 AM to 6:15 PM with 1-hour headways, and Sundays from approximately 7:45 AM to 6:15 PM with 1-hour headways.

OmniTrans Route 8 operates between the City of San Bernardino and the City of Yucaipa, traveling through San Bernardino along Rialto Avenue, Sierra Way, and Mill Street in the Project vicinity. Route 8 operates on weekdays from approximately 4:50 AM to 10:40 PM with approximately 30-minute to 1-hour headways, on Saturdays from 6:15 AM to 7:30 PM with 1-hour headways, and on Sundays from 7:20 AM to 7:00 PM with 1-hour headways.

Refer to **Table 19**, *City of San Bernardino Multimodal Connectivity*, for a list of facility types and locations near the Project site.

Table 19: City of San Bernardino Multimodal Connectivity

Facility	Facility Type	Facility Location
San Bernardino Metrolink Station	Train Station (0.8-miles NW)	1170 W. 3rd Street
San Bernardino Bus Transit Center	Bus Station (0.8-miles NW)	1170 W. 3rd Street
City-wide Bus Stops	Bust Stops	Throughout City
Source: County of San Bernardino. *San Bernardino County Non-Motorized Transportation Plan – Chapter* 5. Available at http://www.scag.ca.gov/Documents/SANBAGNon-MotorizedTransportationPlan_03-11-3.pdf. Accessed on March 2019.		

Bicycle Facilities

Bikeway planning and design in California typically rely on guidelines and design standards established by Caltrans (2015) in the Highway Design Manual (Chapter 1000: Bicycle Transportation Design). The manual describes three distinct types of bikeway facilities, as listed below.

- Bike path (Class I) – A completely separate right-of-way designed for the exclusive use of bicycle and pedestrian traffic with cross-flow minimized.
- Bike lane (Class II) – A striped lane for one-way bike travel on a street or highway, typically including signs placed along the street segment.

- Bike route (Class III) – Provides a shared use with pedestrian or motor vehicle traffic. Typically, these facilities are city streets with signage designating the segment as a bike route without additional striping or facilities.

The following are planning bicycle facilities in the vicinity of the Project site: the Santa Ana River Trail/Class I bicycle facility is located approximately 1.30-miles southeast of the Project site, a Class II bicycle facility on Mill Street approximately 0.25-miles south, and a Class II bicycle facility on Arrowhead Avenue approximately 0.4-miles west.[51]

Pedestrian Facilities

The Project site is bounded by Waterman Avenue on the east, Allen Street on the west, and Valley Street on the south. All three sides of the Project site provide roughly fifty percent of fully developed pedestrian facilities/sidewalks. The remaining portions of the sidewalks are composed of dirt and/or ruderal grasses.

Implementation of the proposed Project would fully develop the site, including the offsite pedestrian facilities/sidewalks. The fully developed sidewalk network would provide students with connected infrastructure for movement around the proposed Project. The sidewalks will allow students to walk to the transit stops referenced above. A new traffic signal at the intersection of Waterman Avenue and Valley Street would provide crosswalks which would improve pedestrian movement to and from the Project site.

Internal Circulation

Internal circulation for the morning drop-off period would consist of vehicles entering the school site via the Valley Street driveway. Vehicles would then circulate in a clockwise direction around the main campus. Drop-off zones would be located just north of buildings A and B, and just east of buildings B, C, D, and E. After parents drop off their students, they may exit the site via the Valley Street driveway or the right-out only driveway on Waterman Avenue.

Site Access

- Driveway 1 is 64-foot-wide driveway and the primary ingress and egress point to the NSLA campus. Driveway 1 on Valley Street would be located approximately 640 feet east of Allen Street and approximately 320 feet west of Waterman Avenue. Driveway 1 would be a full-movement driveway for vehicles during the morning drop-off and afternoon pick-up periods.

- Driveway 2 is a 48-foot-wide driveway on Waterman Avenue, located approximately 990 feet north of Valley Street, and would be limited to right-out/egress from the Project site

[51] Non-Motorized Transportation Plan – Revised June 2018. *Chapter 5: City of San Bernardino*. Available at http://www.scag.ca.gov/Documents/SANBAGNon-MotorizedTransportationPlan_03-11-3.pdf. Accessed on June 2019.

during school drop-off and pick-up periods. The driveway would otherwise provide full-movement for vehicles during non-pick-up/drop-off periods. Ingress via Driveway 2 would be blocked off during the morning drop-off and afternoon pick-up periods to minimize conflict with internal circulation.

- Driveway 3 is a 27-foot-wide full vehicle access driveway for the Head Start/Preschool, located at the northwest corner of the Project site, along Allen Street. Driveway 3 will also provide ingress and egress to school busses for children drop-off and pick-up. Busses entering Driveway 3, would stop in front of the building entrance for pick-up or drop-off, and busses would then move in a clockwise direction along the parking/driving aisles and exit from Driveway 4.

- Driveway 4 is a 26-foot-wide full vehicle access driveway for the Head Start/Preschool, located at the northwest corner of the Project site, along Allen Street. Driveway 4 is the second driveway for the Head Start/Preschool facility. Driveway 4 will also provide ingress and egress to school busses for children drop-off and pick-up. Busses entering Driveway 4, would move in a counterclockwise direction around the site, and until reaching the designated drop-off and pick-up area located on the northern portion of the building. Busses entering on Driveway 4 would then exit via Driveway 3.

- Driveway 5 is the 28-foot-wide southwestern most driveway on Allen Street, located approximately 750 feet north of Valley Street. Driveway 5 would allow all turning movements. This driveway is intended to provide full access for buses during sporting events and other activities. Driveway 5 would also be available for emergency vehicle access and/or evacuation. Otherwise, Driveway 5 would remain closed to the public.

Refer to **Exhibit 10**, *Proposed Project Site Driveways*, for driveway locations.

Existing Intersection Operation Conditions and Traffic Volumes

Trip generation estimates for the Norton Science and Language Academy Project are based on actual trip rates from the existing Norton Science and Language Academy school based on driveway counts and observations of current operations, as well as the following daily and peak hour trip generation rates obtained from the Institute of Transportation Engineers (ITE) Trip Generation Manual (10th Edition):

- ITE Land Use 534: Private School (K – 8)
- ITE Land Use 536: Private School (K – 12)

The level of service criteria for signalized and unsignalized intersections was determined using the Highway Capacity Manual (HCM) 6th Edition.

As described in the project description, the existing Norton Science and Language Academy located on the southeast corner of Foisy Street and Central Avenue will be relocated to the proposed project location. The redistribution of local trips as associated with the relocation of the Academy were estimated and taken into account in the evaluation of traffic impacts.

The trip rates and the estimated Project trip generation are shown on **Table 20,** *Summary of Project Trip Generation*. The proposed Project is estimated to generate 5,906 trips on a daily basis, with 1,746 trips in the morning peak hour and 383 trips in the evening peak hour. After applying reduction factors from the existing Norton Science and Language Academy school, the proposed project is estimated to generate 2,182 additional trips to the existing roadway system on a daily basis, with 775 additional trips in the morning peak hour and 147 additional trips in the evening peak hour.

Table 20: Summary of Project Trip Generation

Land Use	ITE Code	Unit	Trip Generation Rates						
			Daily[1]	AM Peak Hour[2]			PM Peak Hour[1]		
				In	Out	Total	In	Out	Total
Existing NSLA and Headstart[3]	534	Student	4.110	0.568	0.503	1.07	0.120	0.140	0.26
Charter School (K-12)[4]	536	Student	2.480	0.553	0.383	0.94	0.073	0.097	0.17
Land Use	**Quantity**	**Unit**	**Trip Generation Rates**						
			Daily	**AM Peak Hour**			**PM Peak Hour**		
				In	**Out**	**Total**	**In**	**Out**	**Total**
Existing NSLA and Head Start Trips									
Existing NSLA and Headstart	906	Student	3,724	515	456	971	109	127	236
New Trips due to Relocation	27%		1,005	139	123	262	29	34	63
Additional Proposed Trips									
Charter School (K-8) and Head Start	100	Student	411	57	50	107	12	14	26
Charter School (K-12)	714	Student	1,771	395	273	668	52	69	121
Total Project Trips			**5,906**	**967**	**779**	**1,746**	**173**	**210**	**383**
Net Project Trips			*2,182*	*452*	*323*	*775*	*64*	*83*	*147*

Source: Kimley-Horn. September 2019. *Updated Traffic Impact Analysis*. (See Appendix G)
[1]Source: Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition.
[2]AM peak hour rates for the existing Norton Science and Language Academy (NSLA) are based on morning driveway and drop-off counts conducted on Thursday, April 25th, 2019.
[3]The existing NSLA currently has 786 K-8 students and 120 Head Start students.
[4]High School AM peak hour rates were based on the rates from the existing NSLA, combined with a factored ratio between ITE Land Use Code (LUC) 534 - Private School (K-8) and LUC 536 - Private School (K-12), in the ITE Trip Generation Manual, 10th Edition.
[5]New trips due to relocation are existing trips at the NSLA site that will need to travel through the study intersections to attend the relocated school, compared to the existing NSLA. The percentage estimate is based on zip code information for students at the existing NSLA.

Analysis Scenarios

In accordance with the City of San Bernardino *Traffic Impact Study Guidelines*, the project will be evaluated in the morning and evening peak hours for the following conditions:

- Existing Conditions

- Opening Year 2022 Base
- Opening Year Base Plus Other Projects
- Opening Year Base Plus Other Projects Plus Project Traffic
    - With Mitigation, if necessary
- Future Build-Out 2040 Cumulative Base
- Future Build-Out 2040 Cumulative Base Plus Project
    - With Mitigation, if necessary

Existing morning and evening peak hour turning movement volumes and daily roadway volumes were collected on a typical mid-week weekday in March 2019. For existing morning and evening peak hour volumes and daily segment volumes and a list of the study intersections and segments, refer to **Table 21**, *Existing Conditions - Summary of Intersection Operations,* and **Table 22**, *Existing Conditions – Roadway Segment Analysis.*

Table 21: Existing Conditions - Summary of Intersection Operations

Int. #	Intersection	Traffic Control	Peak Hour	Existing Conditions		
				Delay (sec/veh)	V/C	LOS
1	Waterman Avenue at 9th St	S	AM	27.4	0.381	C
			PM	29.3	0.544	C
2	Waterman Avenue at 5th St	S	AM	22.8	0.370	C
			PM	23.1	0.457	C
3	E Street at 2nd St.	S	AM	14.9	0.492	B
			PM	20.1	0.450	C
4	Waterman Avenue at 2nd Street	S	AM	9.0	0.303	A
			PM	8.8	0.358	A
5	Allen Street at Rialto Avenue	U	AM	10.6	0.394	B
			PM	12.6	0.519	B
6	Waterman Avenue at Rialto Avenue	S	AM	21.2	0.385	C
			PM	19.7	0.456	B
7	Allen Street at Valley Street (uncontrolled)	U	AM	7.2	0.062	A
			PM	7.2	0.060	A
8	Waterman Avenue at Valley Street	U	AM	18.8	0.008	C
			PM	20.6	0.000	C
9	E Street at Mill Street/Inland Center Drive	S	AM	30.8	0.452	C
			PM	36.4	0.631	D
10	Allen Street at Mill Street	U	AM	18.7	0.061	C
			PM	27.7	0.175	D
11	Waterman Avenue at Mill Street	S	AM	28.0	0.457	C
			PM	28.5	0.565	C
12	Waterman Avenue at Central Avenue	S	AM	18.3	0.371	B
			PM	17.9	0.417	B
13	Waterman Avenue at Orange Show Road	S	AM	27.6	0.550	C
			PM	31.0	0.774	C

Source: Kimley-Horn. June 2019. *Traffic Impact Analysis*. (See Appendix G)
Notes:
- Level of Service is based on the delay value.
- **Bold** and shaded values indicate intersections operating at LOS E or F or significant impact to intersection per City standards.

Int. #	Intersection	Traffic Control	Peak Hour	Existing Conditions		
				Delay (sec/veh)	V/C	LOS

- At a signalized intersection, delay refers to the average control delay for the entire intersection, measured in seconds per vehicle.
- At a two-way stop-controlled intersection, delay refers to the average vehicle delay on the movement with the highest delay.
- Delay values are based on the methodology outlined in the Highway Capacity Manual, 6th Edition.
- S = Signalized
- U = Unsignalized

[1] Allen Street at Valley Street is currently uncontrolled on each leg of the intersection. Based on the equal amount of traffic on Allen Street and Valley Street, the intersection was analyzed as all-way stop controlled.

Table 22: Existing Conditions - Roadway Segment Analysis

Roadway	Segment	Lane Configuration	LOS E Capacity	Existing ADT	V/C	LOS
Waterman Avenue	5th Street to 2nd Street	6-Lanes Divided	60,000	21,134	0.352	A
	2nd Street to Valley Street	6-Lanes Divided	60,000	20,787	0.346	A
	Valley Street to Mill Street	6-Lanes Divided	60,000	20,879	0.348	A
	Mill Street to Orange Show Rd	4-Lanes Divided	40,000	22,221	0.556	A
2nd Street	I-215 NB Ramps to E Street	6-Lanes Divided	60,000	21,445	0.357	A
	E Street to Waterman Avenue	4-Lanes Divided	40,000	9,499	0.237	A
Mill Street	I-215 NB Ramps to E Street	4-Lanes Divided	40,000	16,422	0.411	A
	E Street to Waterman Avenue	4-Lanes Divided	40,000	18,846	0.471	A
	East of Waterman Avenue	4-Lanes Divided	40,000	15,336	0.383	A

Notes:
Source: *City of San Bernardino General Plan Update (2005)*
LOS = Level of Service
ADT = Average Daily Traffic
V/C = Volume to Capacity

As shown above on **Table 21**, *Existing Conditions - Summary of Intersection Operations*, and **Table 22**, *Existing Conditions – Roadway Segment Analysis*, under Existing Conditions, all study intersections and roadway segments currently operate at an acceptable Level of Service.

For a summary of future morning and evening intersection conditions levels of service, refer to **Table 23,** *Opening Year Base (2022) Plus Other Projects Plus Project.*

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Table 23: Opening Year Base (2022) Plus Other Projects Plus Project (unmitigated)

Int. #	Intersection	Traffic Control	Peak Hour	Opening Year Base (2022) Plus Other Projects			Opening Year Base (2022) Plus Other Projects Plus Project			Project Impact/ Significance*		
				Delay (sec/veh)	V/C	LOS	Delay (sec/veh)	V/C	LOS	Delay (sec/veh)	V/C	Sig.
1	Waterman Avenue at 9th St	S	AM	26.4	0.478	C	26.2	0.509	C	-0.2	0.031	No
			PM	30.5	0.653	C	30.5	0.658	C	0.0	0.005	No
2	Waterman Avenue at 5th St	S	AM	21.9	0.449	C	21.5	0.478	C	-0.4	0.029	No
			PM	24.0	0.530	C	24.0	0.534	C	0.0	0.004	No
3	E Street at 2nd St.	S	AM	15.6	0.536	B	15.8	0.558	B	0.2	0.022	No
			PM	20.7	0.491	C	20.7	0.497	C	0.0	0.006	No
4	Waterman Avenue at 2nd Street	S	AM	8.8	0.363	A	8.5	0.384	A	-0.3	0.021	No
			PM	9.0	0.408	A	9.0	0.411	A	0.0	0.003	No
5	Allen Street at Rialto Avenue	U	AM	11.3	0.438	B	25.9	0.754	D	14.6	0.316	No
			PM	13.9	0.579	B	16.4	0.654	C	2.5	0.075	No
6	Waterman Avenue at Rialto Avenue	S	AM	20.8	0.449	C	20.5	0.491	C	-0.3	0.042	**Yes**
			PM	20.3	0.517	C	20.6	0.532	C	0.3	0.015	No
7	Allen Street at Valley Street	U	AM	7.2	0.067	A	13.7	0.590	B	6.5	0.523	No
			PM	7.2	0.066	A	7.8	0.139	A	0.6	0.073	No
8	Waterman Avenue at Valley Street	U	AM	24.4	0.011	C	Overflow	0.256	**F**	Overflow	0.245	**Yes**
			PM	14.2	0.044	B	31.9	0.233	**D**	17.7	0.189	**No**
9	E Street at Mill Street/Inland Center Drive	S	AM	31.9	0.509	C	31.9	0.577	C	0.0	0.068	**Yes**
			PM	35.6	0.708	D	35.3	0.721	D	-0.3	0.013	No
10	Allen Street at Mill Street	U	AM	15.3	0.048	C	26.9	0.137	**D**	11.6	0.089	**No**
			PM	19.4	0.124	C	21.8	0.149	**C**	2.4	0.025	**No**
11	Waterman Avenue at Mill Street	S	AM	27.8	0.529	C	27.7	0.595	C	-0.1	0.066	**Yes**
			PM	29.6	0.640	C	29.8	0.660	C	0.2	0.020	No
12	Waterman Avenue at Central Avenue	S	AM	18.2	0.436	B	18.3	0.528	B	0.1	0.092	No
			PM	18.4	0.473	B	18.6	0.490	B	0.2	0.017	No
13	Waterman Avenue at Orange Show Road	S	AM	34.2	0.727	C	35.2	0.754	D	1.0	0.027	No
			PM	47.0	0.965	D	46.6	0.970	D	-0.4	0.005	No
D1	Valley Street at D1	U	AM				117.5	0.989	**F**			
			PM				9.9	0.062	A			
D2	Waterman Avenue at D2	U	AM				26.3	0.594	D			

Int. #	Intersection	Traffic Control	Peak Hour	Opening Year Base (2022) Plus Other Projects			Opening Year Base (2022) Plus Other Projects Plus Project			Project Impact/ Significance*		
				Delay (sec/veh)	V/C	LOS	Delay (sec/veh)	V/C	LOS	Delay (sec/veh)	V/C	Sig.
			PM				15.3	0.155	C			
D3	Allen Street at D3/4[1]	U	AM				18.8	0.181	C			
			PM				10.2	0.024	B			
D5	Allen Street at D5	U	AM				0.0	0.000	A			
			PM				0.0	0.000	A			

Source: Kimley-Horn. June 2019. *Traffic Impact Analysis*. (See Appendix G)

*"**Significance**" is with respect to the City's TIA Guidelines, which simply indicates an intersection requiring further study.

Notes:
- Level of Service is based on the delay value.
- **Bold** and shaded values indicate intersections operating at LOS E or F or significant impact to intersection per City standards.
- At a signalized intersection, delay refers to the average control delay for the entire intersection, measured in seconds per vehicle.
- At a two-way stop-controlled intersection, delay refers to the average vehicle delay on the movement with the highest delay.
- Delay values are based on the methodology outlined in the Highway Capacity Manual, 6th Edition.
- S = Signalized
- U = Unsignalized

[1] For analysis purposes, the two proposed driveways for the Head Start facility were analyzed as one driveway.

Opening Year Analysis

Intersection Level of Service analysis was conducted for the Opening Year Base Plus Other Projects Plus Project condition. Project-related traffic for the NSLA Academy was added to the Opening Year Base Plus Other Projects traffic volumes, and the resulting "Plus Project" traffic volumes are shown on Table 23, above. Copies of the intersection analysis worksheets are provided in *Appendix G*. Review of Table 23 indicates that the following intersections would continue to operate at an acceptable Level of Service under Opening Year Base Plus Other Projects Plus Project conditions, but the Project-related impact would be considered significant pursuant to the City's Traffic Impact Study (TIS) guidelines, due to the overall increase in traffic at these locations:

- #6 – Waterman Avenue at Rialto Avenue
- #9 – E Street at Mill Street/Inland Center Drive
- #11 – Waterman Avenue at Mill Street

The above Intersections #6, #9, and #11 show "significant" impacts based on the City's TIS guidelines, but would continue to operate at an acceptable LOS of D or better with the addition of Project traffic. Based on the City's TIS guidelines, mitigation measures are required for intersections that have a significant impact and operate at LOS D or worse; therefore, no mitigation measures are required for these intersections.

However, with the addition of Project traffic, the following intersection would worsen to an unacceptable Level of Service with the addition of Project traffic in the AM Peak Period:

- #8 – Waterman Avenue at Valley Street – AM LOS F

The Level of Service for an unsignalized intersection is reported based on the single approach movement with the highest delay, which in this case, would be the eastbound approach for intersection #8. The side street traffic at the intersection experience delay during the peak hours while waiting for an acceptable gap in traffic on Waterman Avenue for intersection #8. While the side street approach operates at a deficient Level of Service based on the highest delay approach, the overall intersection delay would be acceptable. Any queuing that occurs on the side street is contained on the minor intersection approach and does not impact the progression of traffic on the main arterial.

Although intersection #8 is anticipated to operate with an overall acceptable delay, the Project owner has agreed to the installation of a traffic signal at intersection #8 (as Mitigation Measure TRAN-1), given the additional AM peak hour delay and the desire to provide for improved site access and safety. With implementation of TRAN-1, intersection #8 would operate at an acceptable level of service (see **Table 25**, *Mitigated Intersection Conditions*).

Future Build-out 2040 Cumulative Analysis

Intersection Level of Service analysis was conducted for the **Future Build-Out 2040 Cumulative Base Plus Project condition**, and the results are shown on **Table 24**, *Future Buildout 2040 Without and Plus Project*. Review of this table indicates that, even with the addition of Project traffic, all intersections would operate at an acceptable Level of Service.

Based on the City's TIS guidelines, the following study intersections would have "significant" impacts, thereby warranting analysis in the TIA. The TIA shows that, in Table 24, these intersections would continue to operate at an acceptable Level of Service under Future Build-Out 2040 Plus Project conditions. Therefore, mitigation measures are NOT required at these locations.

- #9 – E Street at Mill Street / Inland Center Drive
- #11 – Waterman Avenue / Mill Street

Table 24 shows that during the Future Buildout 2040 "Plus Project" conditions, or with the addition of Project traffic, the following intersections would operate an unacceptable Level of Service:

- #8 – Waterman Avenue / Valley Street – AM LOS F; PM LOS F
- #10 – Allen Street / Mill Street – AM LOS E; PM LOS E

For intersection #8, the applicant has agreed to installing a signal. With the proposed traffic signal, this intersection would operate at an acceptable level of service (see **Table 25**, *Mitigated Intersection Conditions*).

As shown below in Table 24 and discussed further below under Traffic Signal Warrants Analysis, intersection #10 is anticipated to have an unacceptable delay, in only one peak hour for only one turning movement direction. Based on analysis and discussion with the City Engineer, intersection #10 would not be considered a significant impact in Build-out conditions due to all movements (except for the southbound left) operating acceptably. Moreover, analysis shows that installation of a signal would interrupt through traffic on Mill Street. For these reasons, a traffic signal is not necessary at intersection #10.

Table 24: Future Buildout 2040 Without and Plus Project (unmitigated)

Int. #	Intersection	Traffic Control	Peak Hour	Build-out Without Project			Build-out Plus Project			Project Impact/ Significance		
				Delay (sec/veh)	V/C	LOS	Delay (sec/veh)	V/C	LOS	Delay (sec/veh)	V/C	Sig.
1	Waterman Avenue at 9th St	S	AM	28.3	0.513	C	28.0	0.539	C	-0.3	0.026	No
			PM	31.8	0.704	C	31.8	0.707	C	0.0	0.003	No
2	Waterman Avenue at 5th St	S	AM	23.2	0.507	C	22.9	0.53	C	-0.3	0.025	No
			PM	25.5	0.601	D	25.5	0.605	D	0.0	0.004	No
3	E Street at 2nd St.	S	AM	21.8	0.652	C	22.	0.673	C	0.3	0.021	No
			PM	24.1	0.551	C	24.2	0.556	C	0.1	0.005	No
4	Waterman Avenue at 2nd Street	S	AM	9.1	0.367	A	8.9	0.385	A	-0.2	0.018	No
			PM	8.7	0.431	A	8.7	0.400	A	0.0	-0.031	No
5	Allen Street at Rialto Avenue	U	AM	10.7	0.402	B	20.5	0.660	C	9.8	0.258	No
			PM	13.7	0.578	B	15.8	0.646	C	2.1	0.068	No
6	Waterman Avenue at Rialto Avenue	S	AM	20.8	0.445	C	20.5	0.474	C	-0.3	0.029	No
			PM	21.9	0.587	C	22.1	0.601	C	0.2	0.014	No
7	Allen Street at Valley Street	U	AM	7.2	0.060	A	13.3	0.569	B	6.1	0.509	No
			PM	7.2	0.055	A	7.7	0.127	A	0.5	0.072	No
8	Waterman Avenue at Valley Street	U	AM	25.8	0.011	D	Overflow	0.257	**F**	Overflow	0.246	**Yes**
			PM	31.4	0.000	D	38.2	0.275	**E**	6.8	0.275	**Yes**
9	E Street at Mill Street/Inland Center Drive	S	AM	30.8	0.456	C	30.3	0.512	C	-0.5	0.056	**Yes**
			PM	35.6	0.678	D	35.4	0.690	D	-0.2	0.012	No
10	Allen Street at Mill Street	U	AM	23.4	0.079	C	45.3	0.213	**E**	21.9	0.134	**No**
			PM	33.1	0.214	D	38.5	0.256	**E**	5.4	0.042	**No**
11	Waterman Avenue at Mill Street	S	AM	30.8	0.615	C	31.2	0.707	C	0.4	0.092	**Yes**
			PM	37.2	0.827	D	38.2	0.848	D	1.0	0.021	**Yes**
12	Waterman Avenue at Central Avenue	S	AM	19.3	0.415	B	19.0	0.479	B	-0.3	0.064	No
			PM	22.5	0.477	C	22.7	0.493	C	0.2	0.016	No
13	Waterman Avenue at Orange Show Road	S	AM	28.8	0.690	C	29.7	0.705	C	0.9	0.015	No
			PM	37.5	0.903	D	37.9	0.907	D	0.4	0.004	No
D1	Valley Street at D1	U	AM				117.5	0.989	**F**			
			PM				9.9	0.062	A			
D2	Waterman Avenue at D2	U	AM				11.3	0.293	B			
			PM				9.3	0.071	A			

Int. #	Intersection	Traffic Control	Peak Hour	Build-out Without Project			Build-out Plus Project			Project Impact/ Significance		
				Delay (sec/veh)	V/C	LOS	Delay (sec/veh)	V/C	LOS	Delay (sec/veh)	V/C	Sig.
D3	Allen Street at D3/4[1]	U	AM				14.4	0.129	B			
			PM				9.3	0.020	A			
D5	Allen Street at D5	U	AM				0.0	0.000	A			
			PM				0.0	0.000	A			

Source: Kimley-Horn. June 2019. *Traffic Impact Analysis*. (See Appendix G)
Notes:
- Level of Service is based on the delay value.
- **Bold** and shaded values indicate intersections operating at LOS E or F or significant impact to intersection per City standards.
- At a signalized intersection, delay refers to the average control delay for the entire intersection, measured in seconds per vehicle.
- At a two-way stop-controlled intersection, delay refers to the average vehicle delay on the movement with the highest delay.
- Delay values are based on the methodology outlined in the Highway Capacity Manual, 6th Edition.
- S = Signalized
- U = Unsignalized

Table 25: Mitigated Intersection Conditions

Int. #	Intersection	Traffic Control	Peak Hour	Without Mitigation			With Mitigation		
				Delay (sec/veh)	V/C	LOS	Delay (sec/veh)	V/C	LOS
Opening Year Base Plus Other Projects Plus Project									
8	Allen Street at Valley Street								
	Signalization	S	AM	Overflow	0.256	**F**	45.8	0.768	D
			PM	31.9	0.233	D	31.9	0.331	C
Future Build-Out 2040 Plus Project									
8	Allen Street at Valley Street								
	Signalization	S	AM	Overflow	0.257	**F**	49.8	0.772	D
			PM	38.2	0.275	**E**	32.6	0.387	C

Notes:
- Level of Service is based on the delay value.
- **Bold** and shaded values indicate intersections operating at LOS E or F or significant impact to intersection per City or Caltrans standards.
- At a signalized intersection, delay refers to the average control delay for the entire intersection, measured in seconds per vehicle.
- At a two-way stop-controlled intersection, delay refers to the average vehicle delay on the movement with the highest delay.
- Delay values are based on the methodology outlined in the Highway Capacity Manual, 6th Edition.

Traffic Signal Warrant Analysis

Traffic signal warrant analyses (Warrant 3 – Peak Hour) were completed for the following unsignalized intersections using the California Manual on Uniform Traffic Control Devices (MUTCD, 2017):

- #5 – Allen Street at Rialto Avenue
- #7 – Allen Street at Valley Street
- #8 – Waterman Avenue at Valley Street
- #10 – Allen Street at Mill Street

Using the forecasted volumes from the Opening Year Base Plus Other Projects Plus Project condition, Warrant 3 is not met during the morning nor the evening peak hours for both intersections #5 and #7. Without signalization, both unsignalized intersections would operate at an acceptable Level of Service in the Opening Year Base Plus Other Projects Plus Project conditions. The traffic signal warrant worksheets are provided in the TIA Appendix G.

Using the forecasted volumes from the Opening Year Base Plus Other Plus Project conditions, Warrant 3 is only met during the morning peak hour for intersections #8 and #10. Refer to TIA Appendix G for traffic signal warrant worksheets. To mitigate impacts to intersection #8, the applicant has agreed to Mitigation TRAN-1, which requires the installation of a traffic signal at this intersection.

The California Manual on Uniform Traffic Control Devices (MUTCD) specifically states that, “The satisfaction of a traffic signal warrant or warrants shall not in itself require the installation of a traffic control signal.” The reference document goes on to state a number of other factors to take into account when considering a signal for a specific location, including whether or not a signal would improve the overall safety of the intersection, whether it would benefit or disrupt progressive traffic flow (in these cases, Waterman Avenue and Mill Street, and consideration of site-specific characteristics such as queuing, signal spacing, and overall delay to the main street through movements.

Based on analysis and discussions with the City Engineer, it was determined that a traffic signal is not recommended for intersection #10. Installation of a signal would impede through traffic flows on Mill Street.

Road Segment Analysis

All study roadway segments would operate at an acceptable LOS in the Future Build-Out 2040 Cumulative Base scenario, with exception of the following roadway segment:

- #8 – Mill Street – E Street to Waterman Avenue – LOS D

The roadway segment of Mill Street from E Street to Waterman Avenue was analyzed further as a six-lane Major Arterial to provide an acceptable Level of Service for the Future Build-Out 2040 Cumulative Base condition, consistent with the City's General Plan Circulation Element. Note that the City's TIS Guidelines do not establish any significance thresholds for road segments.

Project Site Driveways

Vehicular access provisions for the Project would consist of five proposed driveways: three full-movement driveways on Allen Street; one right-in-right-out only driveway on Waterman Avenue; and one full-movement driveway on Valley Street. All project driveways to the site would be unsignalized.

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

Less Than Significant Impact with Mitigation. The proposed Project is anticipated to generate vehicular and truck traffic from construction activities lasting through the duration of opening year 2022. It is anticipated that vehicular, bicycle, transit and pedestrian traffic and occasional truck traffic from deliveries would be generated from operational activities. Refer to discussion above regarding Project traffic impacts and required mitigation measures to provide acceptable levels of service. The Project is in response to City staff and stakeholder desire to relocate the current NSLA school to the proposed site, which is considered more suitable for an educational facility and eliminates motor vehicle and pedestrian conflicts experienced at the current NSLA site.

The Project does not otherwise conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. On the contrary, the Project would contribute to the overall City's pedestrian infrastructure by providing fully developed sidewalks along Waterman Avenue, Allen Street, and Valley Street. Additionally, Project construction or operations would not disrupt existing transit routes, bus stops, or future bicycle facilities because none are located immediately adjacent to the Project site.

Mitigation Measure:

MM TRAN-1 The applicant shall provide a traffic signal at the intersection of Waterman Avenue and Valley Street (intersection #8), prior to issuance of certificates of occupancy, or as otherwise determined necessary to avoid a significant impact pursuant to the City's *Traffic Impact Study Guidelines*.

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

Less Than Significant Impact. CEQA Guidelines Section 15064.3 provides that for land use projects, impacts related to vehicle miles traveled (VMT) exceeding an applicable threshold of significance may indicate a significant impact. The City of San Bernardino has not adopted a VMT threshold. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor are presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the Project area compared to existing conditions are presumed to have a less than significant transportation impact. While the City has not yet adopted an VMT threshold, the Project can also be qualitatively analyzed to understand factors such as the availability of transit, proximity to other destination, etc.

Consistent with CEQA Guidelines section 15064.3, subdivision (b), the Project site is within a half-mile of existing transit stops. The following two transit stops are located in the vicinity of the Project site: a transit stop is located at the intersection of Waterman Avenue and 2nd Street, approximately 0.3-miles north, and another transit stop is located at Waterman Avenue and Mill Street, approximately 0.25-miles south of the Project site. Additionally, the San Bernardino Metrolink Station and the San Bernardino Bus Transit Center are located 0.8-miles northwest of the Project site. Moreover, the proposed Project is anticipated to provide fully developed offsite pedestrian infrastructure. Because the Project site is located within half-mile of transit stops, and in close proximity to a Metrolink station and a Bus transit Center, it is not anticipated that the Project would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b); a less than significant impact would occur.

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

No Impact. The design features of the proposed Project do not modify existing or create new roadways and/or intersections. The proposed uses are consistent with the existing neighborhood and impacts of the Project are evaluated throughout this IS/MND.

The internal driveway road constructed with the Project is an extension of the parking lot areas for each of the individual facilities. The NSLA facility and Head Start/Preschool facility would not be connected via a driveway. The internal traffic system within the Project site have been designed to be both efficient and safe for vehicular and pedestrian traffic. There will be no incompatible or hazardous uses associated with the Project. Therefore, no impact will occur.

(d) Result in inadequate emergency access?

Less Than Significant Impact. Emergency ingress and egress is available via the four driveways. Because the Project provides ample ingress and egress opportunities, these driveways ensure that emergency vehicles have an unobstructed ingress and egress to the Project site.

As a standard City practice, if road closures (complete or partial) are necessary, the Police and Fire Departments would be notified of the construction schedule and any required detours would allow emergency vehicles to use alternate routes for emergency response. Additionally, Effective, July 1, 2016, fire protection and emergency medical response services in the City are provided by the San Bernardino County Fire District (SBCFD). More specifically, the City service coverage is provided by SBCFD Division 6, being led by Assistant Chief John Chamberlin.

The SBCFD would review the proposed Project and would provide comments regarding fire and emergency access. The proposed Project would comply with the SBCFD requirements. The impact on emergency access from Project implementation would be less than significant.

Tribal Cultural Resources

ENVIRONMENTAL IMPACTS Issues		Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
18.	**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:**				
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), or		x		
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.		x		

On June 7, 2019, the City invited all tribes that have previously formally requested consultation notification under AB 52 to consult on the proposed Project. The City invited the following Tribes: Gabrielino Band of Mission Indians – Kizh nation, San Manuel Band of Mission Indians (SMBMI), and Soboba Band of Luiseno Indians. No comments or mitigation measures were provided from Gabrielino Band of Mission Indians – Kizh nation, or Soboba Band of Luiseno Indians. Aside from SMBMI, no other tribes responded or provided comments on the Project. SMBMI determined that no consultation was necessary, but did request mitigation measures, which have been incorporated into this IS/MND.

The Native American Heritage Commission (NAHC) provided a list of tribes to be consulted with regarding the proposed Project. On June 17 and 27, 2019, the City invited tribal consultation with interested California Native American tribes consistent with State Bill (SB) 18, as provided by NAHC. The City requested consultation from the following Tribes: Gabrielino Band of Mission Indians – Kizh nation, San Manuel Band of Mission Indians (SMBMI), Soboba Band of Luiseno Indians, Los Coyotes Band of Cahuilla and Cupeno Indians, Serrano Nation of Mission Indians, Soboba Band of Luiseno Indians, Santa Rosa Band of Mission Indians, Agua Caliente Band of Cahuilla Indians, Ramona Band of Cahuilla, Morongo Band of Mission Indians, Cahuilla Band of Indians, Torres-Martinez Desert Cahuilla Indians, Augustine Band of Cahuilla Mission Indians, Serrano Nation of Mission Indians, Cabazon Band of Mission Indians, and San Fernando Band of Mission Indians. No response, comments, or mitigation measures were provided from any of the

Tribes regarding SB 18. From the tribes consulted, only SMBMI responded to the request regarding AB 52. (See Appendices C[1] and C[2] to this IS/MND.

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)?

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. Pursuant to Government Code Section 65352.3 (SB 18) and Government Code Section 21080.3.2(b) and 21074(a)(1)(A)-(B) (AB 52] the City has provided formal notification to California Native American tribal representatives that have previously requested notification from the City regarding projects within the geographic area traditionally and culturally affiliated with tribe(s). Native American groups may have knowledge about cultural resources in the area and may have concerns about adverse effects from development on tribal cultural resources as defined in PRC Section 21074.

SMBMI stated that after ascertaining the existing disturbance within the Project site and the Cultural Resources Assessment (Appendix B) findings, SMBMI determined that there is unlikely any native soil left within the Project site that would contain sensitive cultural resources. However, in an abundance of caution and in the event that previously unknown and unanticipated resources are unearthed during construction activities, SMBMI requests that mitigation measures TCR-1 and TCR-2 be made a part of the Project/permit/plan conditions, to reduce impacts to a less than significant level:

Mitigation Measures:

MM TCR -1 The SMBMI Cultural Resources Department shall be contacted, as detailed in MM CUL-1, of any pre-contact/historic era cultural resources discovered during Project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a cultural resources Monitoring and Treatment Plan shall be created by the Project archaeologist, in coordination with SMBMI, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a tribal monitor to be present that represents SMBMI for the remainder of the Project ground disturbing activities, should SMBMI elect to place a tribal monitor on-site.

MM TCR-2 Any and all archaeological/cultural documents created as a part of the Project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the Project Applicant and Lead Agency for dissemination to SMBMI.

Utilities and Service Systems

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
19. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				x
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			x	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project projected demand in addition to the provider's existing commitments?			x	
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			x	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			x	

Water and Wastewater

The City Public Works Department is responsible for the design and construction of wastewater collection facilities in the City. Operation and maintenance of wastewater collection facilities is the responsibility of the Public Services Department. Wastewater collection facilities within the City are owned and operated by four different entities:

- City of San Bernardino (Public Works and Public Services Departments);
- East Valley Water District (EVWD);
- San Bernardino International Airport and Trade Center; and
- The City of Loma Linda.

Sewer services are provided to the Project area by the San Bernardino Public Works Department and water services are provided by the SBMWD.

(a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications

facilities, the construction or relocation of which could cause significant environmental effects?

No Impact. The proposed Project includes the installation of eight-inch lateral connections to the sewer main and a water line lateral on Waterman Avenue. Existing wastewater treatment facilities have capacity to serve the proposed Project. Expansion of existing facilities or construction of new wastewater treatment facilities would not be needed for implementation of the proposed Project. Therefore, there would be no impact.

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

Less than Significant. The SBMWD provides domestic water for the City and the unincorporated areas of San Bernardino County. Buildout of the Project site was anticipated in the City's 2005 General Plan and General Plan EIR and it was also planned for in the 2015 San Bernardino Valley Regional Urban Water Management Plan (SBRUWMP). The City's General Plan land use designation for the Project site is (R-S) Residential Suburban and (OIP) Office Industrial Park.

SBWMD categorizes water use customers into the following: single-family residential, multifamily residential, commercial/industrial, municipal/government, and landscape. Single-family residential is the largest category, historically accounting for an average of about 51 percent of water deliveries. Multi-family residential and commercial/industrial uses constitute about 16 and 17 percent, respectively. Large landscape use has averaged 12 percent of the supply, and the remaining 4 percent is attributed to municipal/government uses.

Additionally, based on the SCAG population projections for years 2008, 2020, and 2035 contained in the 2012 Integrated Growth Forecast, SBMWD derived a population growth rate for its service area. This growth rate was applied to 2015 water demands to derive estimates of water demands for the years 2020 through 2040, as shown in Table 26 below.

Table 26: SBMWD Forecasted Water Demands

Use Type	2020	2025	2030	2035	2040
Single Family	18,426	19,035	19,664	20,314	20,986
Multi-Family	6,260	6,467	6,681	6,902	7,130
Commercial/ Institutional/ Municipal	7,091	7,325	7,567	7,818	8,076
Landscape Irrigation	4,200	2,800	2,800	2,800	2,800
Fire Service	33	35	36	37	38
Sales/Transfers/Exchanges to other agencies	0	500	1,000	1,500	2,000
Waterman + Baseline Neighborhood Transformation Plan	689	1,378	1,378	1,378	1,378
Nonrevenue	3,670	3,754	3,913	4,075	4,241
Total	**40,369**	**41,294**	**43,039**	**44,823**	**46,649**

Source: *San Bernardino Valley Regional Urban Water Management Plan* (SBRUWMP). 2015. Table 10-4 Demands for Raw and Potable Water – Projected (AF), page 10-5. Available at http://www.sbvmwd.com/home/showdocument?id=4196, accessed October 2019.

As shown above, SBMWD anticipates residential dwelling units to have the most water demand in the district. Considering that the Project would change its anticipated use from residential/industrial to an institutional use which consume less water than residential uses, it is anticipated that the Project would have sufficient water supplies. Therefore, impacts are considered less than significant.

(c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project projected demand in addition to the provider's existing commitments?

Less than Significant. According with discussions with the City of San Bernardino Municipal Water Department (SBMWD), with respect to sewage collection, the Project will have no negative impact on the 18" VCP Sewer Main trending East-West thru the Project site. This main typically flows less than half full.

Similarly, with respect to sewage treatment, no negative impact is anticipated on the SBMWD operated regional Wastewater Treatment Plant. The Plant has more treatment capacity available than currently required. When the East Valley Water District (EVWD) completes their own wastewater treatment plant, the SBMWD's Wastewater Treatment Plant capacity will increase by at least 5 million gallons per day (MGD). The SBMWD presently operates the regional wastewater treatment plant with waste streams from both the EVWD and the City of Loma Linda. Based on this, the proposed Project will have a less than significant impact on the SBMWD's ability to collect or treat the proposed Project's waste stream.[52]

(d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less than Significant. The City of San Bernardino Refuse and Recycling Division provides collection services to residential and commercial customers for refuse, recyclables, and green waste. Solid waste is collected and sent to the East Valley Transfer and Recycling Materials Recovery Facility, located at 1150 & 1250 S Tippecanoe Ave, San Bernardino, CA 92408, where it is separated from recyclable materials. Solid waste is then shipped to the Mid-Valley Sanitary Landfill at 2390 N. Alder Avenue in the City of Rialto. The Mid-Valley Sanitary Landfill has a daily permitted throughput of 7,500 tons/day and a remaining capacity of 101,300,000 cubic yards. CalRecycle establishes waste generation rates for different land uses. The institutional section waste generation rate is 3.55 lbs/employee/day. Under this assumption, the approximately 120 NSLA staff plus the approximately 42 Head Start/Preschool staff (3.55 lbs x 162 employees x day) would generate approximately 575 lbs/day. CalRecycle has determined that students generate

[52] San Bernardino Municipal Water Department (SBMWD). October 21, 2019. Email conversation with Robert L. Lindberg, Associate Engineer.

1.0 lbs of waste on average per day (1.0 lbs/student/day)[53]. Based on the anticipated 1,500 NSLA students and approximately 220 Head Start/Preschool students, the Project is anticipated to generate approximately 1,710 lbs/day from students, for a total of approximately 2,285 total lbs/day or just over 1.0 ton of waste per day. This represents a nominal percentage of the landfill's daily permitted capacity. Additionally, the Project would comply with AB 1826 (2014), which requires businesses, defined to include nonprofit corporations that generate 4 cubic yards or more of solid waste, to implement an organic waste recycling program to divert organic waste generation. Therefore, impacts would be less than significant.

(e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less than Significant. Solid waste disposal services must follow federal, State, and local statutes and regulations related to the collection of solid waste. The proposed Project is an institutional facility which would not involve the production or handling of any acutely toxic or otherwise hazardous materials. The proposed Project would be required to comply with Municipal Code 8.24.100, which contains provisions for the City's Construction and Demolition Debris Recycling Program. As such, impacts would be less than significant.

[53] CalRecycle. 1993. *Institutional Sector Waste Generation Rates*. Available at https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates, accessed on June 2019.

Wildfire

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

(a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The proposed Project is neither an EFHA nor in a MFHA.[54] The nearest EFHA and MFHA areas are located approximately 4.0-miles west and six miles north from the Project site. The City's Emergency Operations Plan (EOP) addresses the City of San Bernardino' s planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies. It provides an overview of operational concepts, identifies components of the City's emergency management organization within the Standardized Emergency Management System (SEMS) and the National Incident Management System (NIMS). It also describes the overall responsibilities of the federal, state, and county entities for protecting life and property and assuring the overall well-being of the population. Each organization identified in the EOP is responsible for, and expected to develop, implement, and test policies, procedures, instructions, and checklists that reflect cognizance of the emergency management concepts contained herein. Coordinated response and support roles must be defined by these organizations to facilitate the ability to respond to any given incident. The EOP meets the requirements of NIMS for the purposes of emergency management.

[54] General Plan. 2005. *Figure S-9, Fire Hazard Areas, Figure S-9, page 10-43*. Avalable at http://www.sbcity.org/civicax/filebank/blobdload.aspx?blobid=26199. Accessed on September 2019.

Additionally, the Project would be consistent with existing law AB 1747, which requires that all public schools, in kindergarten, and grades 1 to 12, inclusive, operated by school districts, in cooperation with specified entities and individuals, develop a comprehensive school safety plan, as provided.[55] The proposed Project would not impair or physically interfere with an adopted emergency response or evacuation plan. Therefore, no impact would occur.

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

No Impact. As discussed in the General Plan EIR, wind impact and wildfire impact have the most impact in the City of San Bernardino north of SR 210 along the foothills.[56] The proposed Project is in the south portion of the City, which is not prone to wildland fires and prone to wind hazards. Thus, in the event of a wildfire, Project occupants would not be directly exposed to pollutant concentrations from a wildfire. Therefore, no impact would occur.

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

No Impact. As previously discussed, all proposed Project components (including infrastructure, etc.) would be within the boundaries of the Project site, and impacts associated with the development of the Project within this footprint area are analyzed throughout this document. Additionally, the San Bernardino County Fire Department, as part of the City's process, will review all building permit plans for adequate fire suppression, fire access, and emergency evacuation. Adherence to standard City policies eliminate the potential for impacts. Therefore, no impact would occur.

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

No Impact. The proposed Project is not located in a EFHA and MFHA as identified in the General Plan. There are also no natural drainage courses located on-site. The Project site is relatively flat and the proposed on-site detention/infiltration basin would limit the release of stormwater from the site; therefore, the Proposed project site would not expose people to flooding or landslides as a result of runoff, post-fire slope instability or drainage changes. Therefore, no impact would occur.

[55] California Legislative Information. 2017-2018. *AB-1747 School Safety Plans*. Available at https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180AB1747, accessed on October 2019.
[56] General Plan. 2005. *Figure S-8 – Wind Hazards, and Figure S-9 – Fire Hazard Areas, page 10-43*. Avalable at http://www.sbcity.org/civicax/filebank/blobdload.aspx?blobid=26199. Accessed on September 2019.

Mandatory Findings of Significance

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
21. MANDATORY FINDINGS OF SIGNIFICANCE. Does the project:				
a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X	
b) 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 the past projects, the effects of other current projects, and the effects of probable future projects.)			X	
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

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

Less Than Significant Impact. All impacts to the environment, including impacts to habitat for fish and wildlife species, fish and wildlife populations, plant and animal communities, rare and endangered plants and animals, and historical and pre-historical resources were evaluated as part of this IS/MND. Throughout this IS/MND, where impacts were determined to be potentially significant, mitigation measures have been proposed to reduce those impacts to less than significant levels. Accordingly, with incorporation of the mitigation measures recommended throughout this IS/MND, the Project would not substantially degrade the quality of the environment and impacts would be less than significant.

(b) 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 the past projects, the effects of other current projects, and the effects of probable future projects.)

Less than Significant Impact. As discussed throughout this IS/MND, implementation of the proposed Project has the potential to result in effects to the environment that are individually limited, and may be cumulatively considerable in specific areas. In all instances where the proposed Project has the potential to contribute to a cumulatively considerable impact to the environment, mitigation measures have been imposed to reduce potential effects to less than significant levels. As such, with incorporation of the mitigation measures imposed throughout this IS/MND, the Project would not contribute to environmental effects that are individually limited, but cumulatively considerable, and impacts would be less than significant.

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

Less Than Significant Impact. The Project's potential to result in environmental effects that could adversely affect human beings, either directly or indirectly, has been discussed throughout this IS/MND. In instances where the Project has potential to result in direct or indirect adverse effects to human beings, mitigation measures have been applied to reduce the impact to below a level of significance. With required implementation of mitigation measures identified in this IS/MND, construction and operation of the proposed Project would not involve any activities that would result in environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly.

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