

Highland West Industrial Warehouse Project Initial Study and Mitigated Negative Declaration

Lead Agency:

City of Highland
Planning Department of Highland
27215 Base Line
Highland, California 92346
909-864-6861



Prepared for:

Crow Holdings Industrial
527 W. 7th Street, Suite 200
Los Angeles, CA 90014

Prepared by:

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Riverside, California 92507



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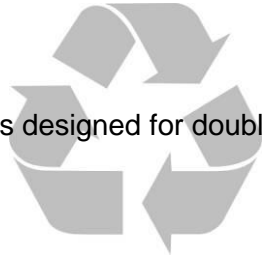


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1 Introduction

The City of Highland (Lead Agency) received an application from Crow Holdings Industrial (applicant) for the construction of a 146,670-square foot industrial building which includes 6,000-square foot of office/mezzanine space) on approximately 6.93 net acres of land in the City of Highland, California. The application includes a Conditional Use Permit (CUP 22-005), Major Design Review (DRA22-011), Major Variance (VAR22-004), and Tentative Parcel Map (TPM22-008) applications. The approval of the application constitutes a *project* that is subject to review under the California Environmental Quality Act (CEQA) 1970 (Public Resources Code §§ 21000, *et seq.*), and the CEQA Guidelines (14 California Code of Regulations §§ 15000, *et seq.*).

This Initial Study was prepared to assess the short-term, long-term, and cumulative environmental impacts resulting from the proposed project. This report was prepared to comply with CEQA Guidelines § 15063, which sets forth the required contents of an Initial Study. These include:

- A description of the project, including the location of the project (See Section 2);
- Identification of the environmental setting (See Section 2.10);
- Identification of environmental effects by the use of a checklist, matrix, or other methods, provided that entries on the checklist or other form are briefly explained to indicate that there is some evidence to support the entries (See Section 4);
- Discussion of ways to mitigate significant effects identified, if any (See Section 4);
- Examination of whether the project is compatible with existing zoning, plans, and other applicable land use controls (See Section 4.11); and
- The name(s) of the person(s) who prepared or participated in the preparation of the Initial Study (See Section 5).

1.1 – Purpose of CEQA

CEQA § 21000 of the California Public Resources Code provides as follows:

The Legislature finds and declares as follows:

- a) The maintenance of a quality environment for the people of this state now and in the future, is a matter of statewide concern.
- b) It is necessary to provide a high-quality environment that at all times is healthful and pleasing to the senses and intellect of man.
- c) There is a need to understand the relationship between the maintenance of high-quality ecological systems and the general welfare of the people of the state, including their enjoyment of the natural resources of the state.
- d) The capacity of the environment is limited, and it is the intent of the Legislature that the government of the state take immediate steps to identify any critical thresholds for the health and safety of the people of the state and take all coordinated actions necessary to prevent such thresholds being reached.
- e) Every citizen has a responsibility to contribute to the preservation and enhancement of the environment.
- f) The interrelationship of policies and practices in the management of natural resources and waste disposal requires systematic and concerted efforts by public and private interests to enhance environmental quality and to control environmental pollution.
- g) It is the intent of the Legislature that all agencies of the state government which regulate activities of private individuals, corporations, and public agencies which are found to affect the quality of the environment, shall regulate such activities so that major consideration is given to preventing

environmental damage while providing a decent home and satisfying living environment for every Californian.

The Legislature further finds and declares that it is the policy of the state to:

- h) Develop and maintain a high-quality environment now and in the future, and take all action necessary to protect, rehabilitate, and enhance the environmental quality of the state.
- i) Take all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive noise.
- j) Prevent the elimination of fish or wildlife species due to man's activities, ensure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities and examples of the major periods of California history.
- k) Ensure that the long-term protection of the environment, consistent with the provision of a decent home and suitable living environment for every Californian, shall be the guiding criterion in public decisions.
- l) Create and maintain conditions under which man and nature can exist in productive harmony to fulfill the social and economic requirements of present and future generations.
- m) Require governmental agencies at all levels to develop standards and procedures necessary to protect environmental quality.
- n) Require governmental agencies at all levels to consider qualitative factors as well as economic and technical factors and long-term benefits and costs, in addition to short-term benefits and costs, and to consider alternatives to proposed actions affecting the environment.

A concise statement of legislative policy, with respect to public agency consideration of projects for some form of approval, is found in CEQA § 21002, quoted below:

The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects. The Legislature further finds and declares that in the event that specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.

1.2 – Public Comments

Comments from all agencies and individuals are invited regarding the information contained in this Initial Study. Such comments should explain any perceived deficiencies in the assessment of impacts in the Initial Study. To request an appointment to review these materials, please contact:

Ash Syed, Associate Planner
City of Highland, Planning Department
27215 Base Line
Highland, California 92346
909-864-6861

All written comments received during the 30-day public review period for the Initial Study/Mitigated Negative Declaration will be considered by the City of Highland prior to adoption.

2 Project Description

2.1 – Project Title

Highland West Industrial Building Project

2.2 – Lead Agency Name and Address

City of Highland
Planning Department
27215 Base Line
Highland, California 92346
909-864-6861

2.3 – Contact Person and Phone Number

Ash Syed, Associate Planner
909-864-6861, ext. 210

2.4 – Project Location

The project site is located on the southeast corner of Central Avenue and 5th Street in the City of Highland, California. (See Exhibit 1 Project Location Map). The surrounding uses include industrial uses north of the project site, business park to the east and west, and the San Bernardino International Airport to the south.

- Latitude 34° 06' 27" North, Longitude 117° 13' 01" West
- APNs #1192-631-01, -02, -03, -04, -05, -06, -15, -16, -17, -18, and -19

2.5 – Project Sponsor's Name and Address

Philip J. Prassas, Vice President
CHIPT Highland 210, L.P.
527 W. 7th Street, Suite 200
Los Angeles, CA 90014

2.6 – General Plan Land Use Designation

Business Park

2.7 – Zoning District

Business Park (BP)

2.8 – Project Description

The project includes development of an industrial building, mezzanine, and associated parking and landscaping on a 6.93 net acre site on the southeast corner of Central Avenue and 5th Street in the City of Highland, California. (APNs #1192-631-01, -02, -03, -04, -05, -06, -15, -16, -17, -18, and -19) (see

Exhibit 2 and 3, Site Plan and Project Elevations). The proposed industrial facility building will be 140,670 square feet with 6,000 square feet of mezzanine/office totaling 146,670 square feet.

Architecture

The proposed building will consist of concrete tilt-up construction with painted and scored accents. The design will provide glazing and colors to provide relief along the length of the building. The elevations will utilize a combination of materials and colors. The main colors of the building will be Gray Screen, Network Gray, and Software with accents of Pure White with Blue reflective glazing on the wall panels. The building corners and office areas will include Blue reflective glazing, Black anodized mullions, and high gloss Web Gray and Black metal canopies to provide an attractive facility.

Landscaping

Landscaping is along 5th Street and Central Avenue on the front setbacks, on all sides of the site, adjacent to the building on the north, south, and west sides, and throughout the parking areas.

The Landscape minimum requirement is 10%. The project provides 15.0% square feet or 23,723 square feet of landscaping on the Building site.

Fencing

The proposed project includes 10-foot high concrete screen walls that will match the paint and color variations of the industrial building on either side of the truck entry driveways. An 8-foot black tube steel fence will run alongside the eastern border of the property along the parking stalls. The truck courts will have 8-foot mechanical sliding gates.

Circulation – Access and On-Site

Access to the site will be from the I-210 and SR-30 freeway exiting at 5th Street and traveling west on 5th Street or access south to Palm Avenue and west on 3rd Street to Central Avenue.

Access to the project is provided as noted:

Automobiles

- Two (2) driveways will be on the west side of the site on Central Avenue
- One (1) driveway will be on the south side of the site on 3rd Street

Trucks

- One (1) driveway will be on the north side of the site on 5th Street
- One (1) driveway will be on the south side of the site on 3rd Street

Emergency vehicle access is provided around the building with a 24-foot fire lane.

Drainage

The proposed project will include an on-site stormwater infiltration system. There are five distinct drainage areas on site that will collect runoff; runoff collected on site through multiple drainage areas and infiltration systems will be conveyed to the City's storm drainage system. Two drainage areas on the west and easterly sides of the building along 3rd Street direct surfaces flows to inlets, where runoff is collected in an underground infiltration systems. Runoff exceeding the capacity of these infiltration

systems will be directed to a new connected 3rd Street storm drain line. In addition, hydrodynamic separators are proposed as pre-treatment Best Management Practices (BMPs), located upstream of the underground infiltration systems. There are an additional three “self-treating” drainage areas on 5th Street, Central Avenue, and 3rd Street; that outlet excess runoff onto the gutters of their respective street. Structural and non-structural BMPs will be utilized in the landscaped areas on the project site.

Building Operations

The industrial building is designed for storage and transportation uses; however, end users have not been identified at this time. As such, details about the future operation of the facilities are not currently available. The applicant requests approval of 24-hour day, 7 days per week operational schedule to provide maximum flexibility for future users.

Construction Schedule

Construction of the proposed Project would last approximately 12 months.

2.9 – Surrounding Land Uses

The proposed project site is surrounded by industrial uses to the north, planned development followed by single family residential land uses to the northwest, and business park uses to the east and west. There are single-family residences located in the industrial zoned land across West 5th Street, multifamily residences in the planned development land use northwest of the site across the intersection of West 5th Street and Central Avenue, and single-family residences located across West 5th Street and Central Avenue. Highland Community Park is located north of the project site, and Highland Head Start preschool is located west of the site, across Central Avenue. To the east are equipment storage and automotive retail spaces, and to the south is the San Bernardino International Airport. Surrounding uses are summarized in Table 2 (Surrounding Land Uses).

Table 2
Surrounding Land Uses

Direction	General Plan Designation	Zoning District	Existing Land Use
Project Site	BP – Business Park	Business Park (BP)	Light Industrial
North	I – Industrial	Industrial (I)	Vacant/Residential
South	Airport	Airport	Airport
East	BP – Business Park	Business Park (BP)	Commercial/Residential
West	BP – Business Park	Business Park (BP)	Restaurant/Retail

2.10 – Environmental Setting

The project is located on an irregularly shaped property approximately 6.93 ± acres in size in a developed area of the City of Highland, California. There are numerous parcels on the property developed for various uses including truck parking facilities, light industrial uses, and equipment storage, and some vacant lots. Buildings on the property range in size from 1,000 square feet to 3,000 square feet with the majority of buildings being single-story structures made from either wood frames and stucco construction or steel frames and metal panel construction. There is some exposed soil on site with moderate grass and weed growth. Pavement on the property is in poor condition with cracking throughout. There are medium to large-sized trees distributed throughout the property. The project site is flat, with an approximate elevation of 1,159 feet above mean sea level (AMSL). The overall site slopes

downward to the west at a gradient of less than 2% \pm . The project site is roughly 1.4 miles west from State Route 210, 5.1 miles east of Interstate 215, and 4.2 miles north of Interstate 10.

2.11 – Required Approvals

Various permits, approvals, and actions by the City of Highland and various public agencies may be required to execute and implement the proposed project. The permits from the lead agency that are necessary include:

- Conditional Use Permit: CUP 22-005
- Major Design Review: DRA 22-011
- Major Variance: VAR 22-004
- Tentative Parcel Map: TPM 22-008

2.12 – Other Public Agency Whose Approval is Required

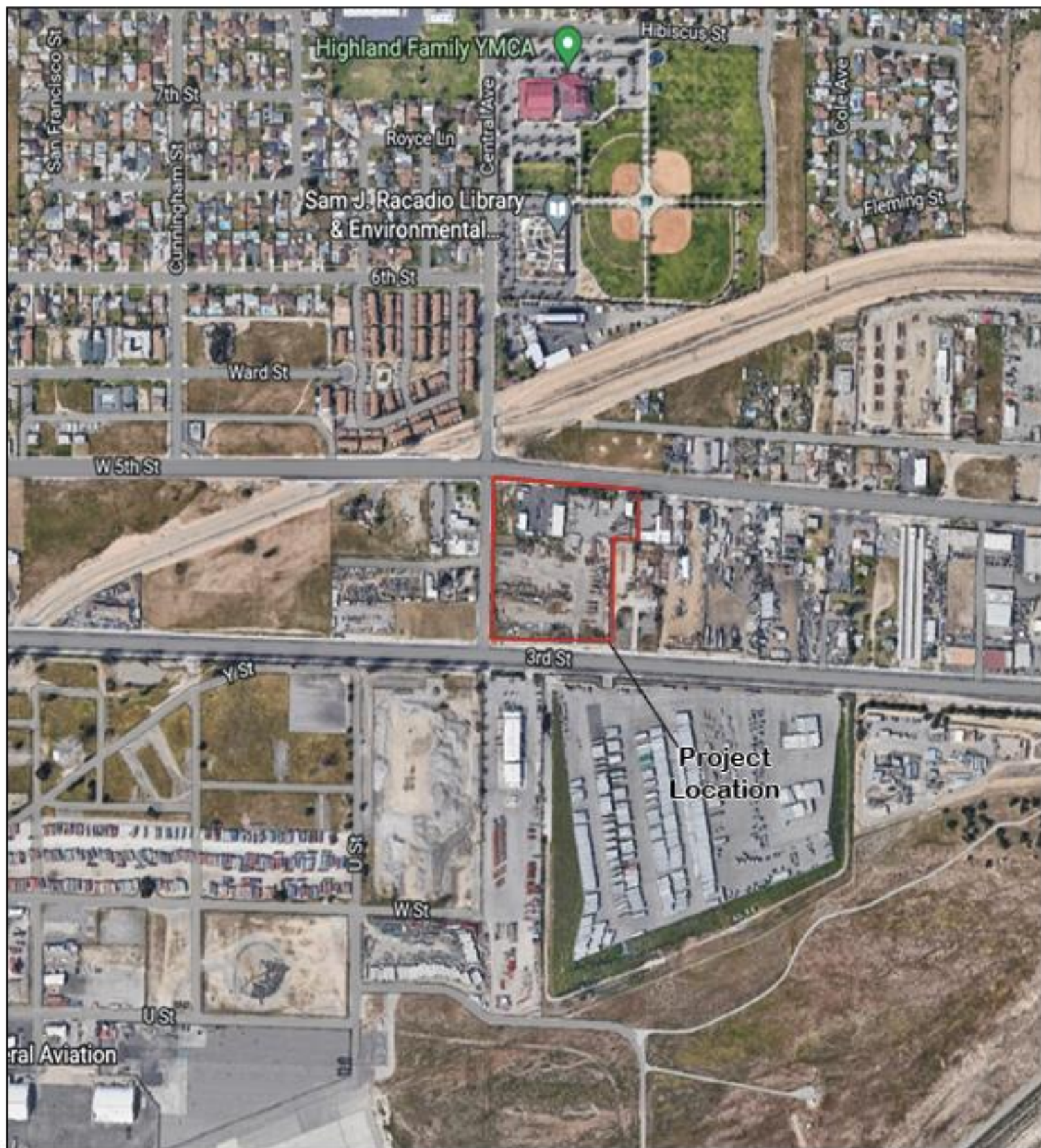
- Federal Aviation Administration
- City of Highland – Public Works Department

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Exhibit 1 Project Regional Location Map
CHIPT Highland West Warehouse Building and Office Space
Highland, California

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Source: Google Maps

<http://www.rslgc.com> • 951-787-9222



Not to Scale

Exhibit 1 Project Location Map

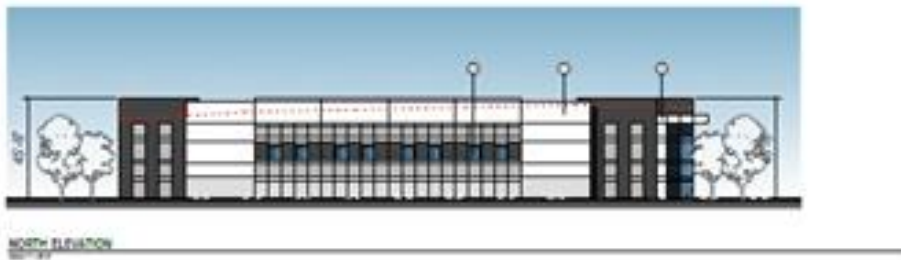
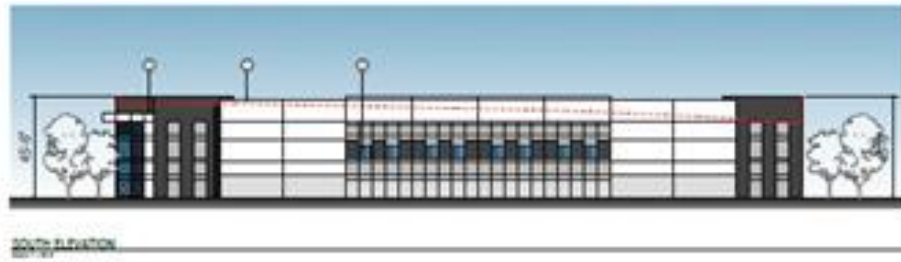
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Highland, California

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CHIPT Highland West Warehouse Building and Office Space
Highland, California

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3 Determination

3.1 – Environmental Factors Potentially Affected

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

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

3.2 – Determination

<input type="checkbox"/>	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
<input checked="" type="checkbox"/>	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.
<input type="checkbox"/>	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
<input type="checkbox"/>	I find that the proposed project MAY have a 'potentially significant impact' or 'potentially significant unless mitigated' impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
<input type="checkbox"/>	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 (b) 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.

Name: Ash Syed, Associate Planner

Date

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4 Evaluation of Environmental Impacts

4.1 – Aesthetics

Except as provided in Public Resources Code Section 21099, would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within view from a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public view 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) **Less than Significant Impact.** Scenic vistas can be impacted by development in two ways. First, a structure may be constructed that blocks the view of a vista. Second, the vista itself may be altered (i.e., development on a scenic hillside). Scenic vistas can generally be defined as natural landscapes that form views of unique flora, geologic, or other natural features that are generally free from urban intrusions. Typical scenic vistas include views of mountains and hills, large, uninterrupted open spaces, and waterbodies. Scenic vistas generally play a large role in the way a community defines itself and effects development patterns as projects are designed to take advantage of viewsheds.

The City of Highland sits at the southern foot of the San Bernardino Mountains, offering a visual backdrop visible from all areas of the City. New developments have the potential to block views of the mountains if building heights are too high. View preservation is vital to maintaining Highland's character, and as such is incorporated into the City's General Plan. Goal 5.1 of the Conservation and Open Space Element sets policies in place to maintain and create vistas throughout the city to enhance the visual

experience of Highland. The project site is located in a developed area of Highland zoned as Business Park (BP). Business Park zoning allows for a building height of 35-feet, therefore a major variance is being applied for the industrial facility to have a building height of 45'-6" feet. Business Park zoning allows for industrial facility construction, and as such the proposed project will not stand out amongst the surrounding visual character of the area. The project will not interfere with any Federal Aviation Authority (FAA) or San Bernardino International Airport Authority (SBIAA) height requirements. The project will not interfere with visual access to Highland's scenic vistas. The project is located in an urbanized area, and fits the zoning designated by the City. Although the proposed height of the industrial facility would exceed Business Park zoning, the difference in height will not constitute any significant loss of visibility to scenic vistas as the area's developed industrial setting is not conducive to appreciating such vistas. Any impacts to the scenic vistas of Highland would be less than significant.

b) **No Impact.** There are no historic highways on the project site, and the site is not visible to a designated state scenic highway as identified on the California Scenic Highway Mapping System.¹ The nearest officially designated scenic highways are California State Route 74 in Banning, and California State Route 38 near Big Bear Lake; the latter starting approximately 4.7 miles southeast of the project site in Redlands. As of this document being written, State Route 330 in Highland has not been officially designated but is eligible. No impacts will occur.

c) **Less than Significant Impact.** The proposed industrial facility building has been designed according to City design guidelines, including requirements for architectural quality, landscaping, and screening, and will be consistent in character and quality with surrounding developments. The proposed height of the industrial facility building will be greater than the building height allowed for Business Park zoning. The proposed building height is 45'-6" feet, greater than the 35-foot height restriction for industrial facilities zoned as Business Park. A major variance is being applied for, as the area is urbanized, and Industrial Zoned Districts neighboring the site allow for industrial facilities to be 50 feet tall. As such, the 45'-6" foot building height will not be inconsistent with other approved heights in the area. The project site will undergo visual changes consistent with an ongoing construction project and will temporarily change the visual character of the site and surrounding area. However, the project will not substantially degrade the existing visual character and qualities of the site and its surroundings, and will have a less than significant impact.

d) **Less than Significant Impact.** Excessive or inappropriately directed lighting can adversely impact night-time views by reducing the ability to see the night sky and stars. Glare can be caused by unshielded or misdirected lighting sources. Reflective surfaces (i.e., polished metal) can also cause glare. Impacts associated with glare range from a simple nuisance to potentially dangerous situations (i.e., if glare is directed into the eyes of motorists). Sources of daytime glare are typically concentrated in commercial areas and are often associated with retail uses. Glare results from development and associated parking areas that contain reflective materials such as hi-efficiency window glass, highly polished surfaces, and expanses of pavement.

Development of parking improvements, related lighting, and associated glare prevention will be in accordance with design standards in the City of Highland Municipal Code; Chapter 16.52.060 Parking Regulations and Chapter 16.40, General Development Standards.² Glare is not expected to result from the increase in pavement or from the industrial facility building. Glare-related impacts to the nearby airport are not discussed in the City's General Plan Airport or Public Health and Safety Elements. Adhering to Highland Municipal Code Standards, will ensure any impacts related to excessive or inappropriately directed lighting will be less than significant.

4.2 – 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:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 (g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) **No Impact.** The California Important Farmland Finder prepared by the California Department of Conservation does not identify the project site as being located on prime farmland, unique farmland, or farmland of Statewide Importance.³ The City of Highland General Plan does identify portions of the eastern city for Agricultural/Equestrian uses, allowing for light agricultural activities and permits the

keeping of large animals. The project site is located away from any land zoned AE, and there will be no conversion of farmlands to non-agricultural uses, and as a result will have no impact.

b) **No Impact.** The project site is not located on land that is used for or conflicting with nearby agriculturally zoned land. The project site is currently zoned Business Park (BP) which does not allow for agricultural uses.⁴ The project site is not located on a Williamson Act parcel in the County of San Bernardino.⁵ There will be no conflict with existing zoning for agricultural use or a Williamson Act contract, therefore there will be no impact.

c) **No Impact.** Public Resources Code Section 12220(g) identifies forest land as *land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.* The project site and surrounding properties are not currently being managed or used for forest land as identified in Public Resources Code Section 12220(g). The project site is zoned as Business Park for commercial uses that include warehousing, office space, and light industrial uses, and as such, development of the project will have no impact to any timberland or forestland zoning.

d) **No Impact.** As indicated in 4.2 c), the area is not designated as forest land; thus, there will be no loss of forest land or conversion of forest land to non-forest use as a result of the project.

e) **No Impact.** The project site currently contains multiple properties with industrial uses including equipment and truck storage, mixed with residential uses within an urbanized environment. Zoning to the west and north of the site is for Business Park and Industrial uses respectively, and the San Bernardino International Airport is across 3rd Street to the south. None of the surrounding sites contain existing forest uses. The development of this proposed project would not change the existing environment in a manner that would result in the conversion of forest land to non-forest use. No impact would occur.

4.3 – 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:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

An *Air Quality and Health Risk Assessment Report (AQHRA)* was prepared for the proposed project by MIG, Inc., dated September 2, 2022 (See Appendix A). The report estimates the potential air quality emissions for the proposed project and evaluates project emissions against applicable South Coast Air Quality Management District (SCAQMD)-recommended California Environmental Quality Act (CEQA) significance thresholds for construction and operation.

a) **Less than Significant Impact.** The proposed project is within the South Coast Air Basin, which is under the jurisdiction of the SCAQMD. Pursuant to the methodology provided in Chapter 12 of the SCAQMD CEQA Air Quality Handbook, consistency with the AQMP is affirmed if the project:

1. Is consistent with the growth assumptions in the AQMP; and
2. Does not increase the frequency or severity of an air quality standards violation, or cause a new one.

Consistency Criterion 1 refers to the growth forecasts and associated assumptions included in the 2016 AQMP. The 2016 AQMP was designed to achieve attainment for all criteria air pollutants within the Basin while still accommodating growth in the region. Projects that are consistent with the AQMP growth assumptions would not interfere with attainment of air quality standards, because this growth is included in the projections used to formulate the AQMP. The proposed project is estimated to create approximately 45 new jobs, which would be well within the SCAG 2016 RTP/SCS growth projections for the County of San Bernardino.⁶ The proposed project is consistent with the General Plan and Zoning

designations, which form the basis for growth assumption accounted for in the SCAG 2016 RTP/SCS. Therefore, the proposed project would not exceed the growth assumptions contained in the AQMP.

Consistency Criterion 2 refers to the CAAQS. In developing its CEQA significance thresholds, the SCAQMD considered the emission levels at which a project's individual emissions would be cumulatively considerable (SCAQMD, 2003; page D-3). As described below, the proposed project would not generate construction or operational emissions in excess of SCAQMD criteria air pollutant thresholds. For the reasons described above, the proposed Project would not conflict with the SCAQMD 2016 AQMP.

b) **Less than Significant Impact.** The proposed project would generate both short-term construction emissions and long-term operational emissions. The project's potential emissions were estimated using CalEEMod, V. 2022.1. As described in more detail below, the proposed project would not generate short-term construction emission or long-term operational emissions that exceed SCAQMD-recommended pollutant thresholds.

Construction Emissions

The proposed project's maximum daily unmitigated construction emissions are shown in Table 3. The construction emissions estimates incorporate measures to control and reduce fugitive dust as required by SCAQMD Rule 403 (see Section 3.3.3, Appendix A) and the implementation of project design features that reduce construction-related air pollutants (see Section 2.3.4, Appendix A). Please refer to Appendix A for CalEEMod output files and detailed construction emissions assumptions.

Table 3: Unmitigated Construction Emissions Estimates						
Season	Maximum Daily Emissions (lbs/day)					
	ROG	NO_x	CO	SO₂	PM₁₀	PM_{2.5}
Summer 2023	1.2	20.2	27.8	<0.1	1.7 ^(A)	0.9 ^(B)
Winter 2023	5.7	24.1	29.1	0.1	4.4 ^(C)	2.2 ^(D)
SCAQMD CEQA Threshold	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No
Source: MIG, 2022 (see Appendix A) and SCAQMD 2019b.						
(A) PM ₁₀ emissions estimates include both exhaust (0.8 lbs/day) and dust (1.2 lbs/day) emissions. Fugitive dust emissions include application of control measures as required by SCAQMD Rule 403, including watering exposed areas two times (2x) daily and cleaning paved roads. Totals may not equal due to rounding.						
(B) PM _{2.5} emissions estimates include both exhaust (0.7 lbs/day) and dust (0.3 lbs/day) emissions. Fugitive dust emissions include application of fugitive dust control measures as required by SCAQMD Rule 403, including watering exposed areas two times (2x) daily. Totals may not equal due to rounding.						
(C) PM ₁₀ emissions estimates include both exhaust (0.9 lbs/day) and dust (3.8 lbs/day) emissions. Fugitive dust emissions include application of control measures as required by SCAQMD Rule 403, including watering exposed areas two times (2x) daily and cleaning paved roads. Totals may not equal due to rounding.						
(D) PM _{2.5} emissions estimates include both exhaust (0.8 lbs/day) and dust (1.6 lbs/day) emissions. Fugitive dust emissions include application of fugitive dust control measures as required by SCAQMD Rule 403, including watering exposed areas two times (2x) daily. Totals may not equal due to rounding.						

As shown in Table 3, the proposed project's maximum daily unmitigated construction emissions would be below the SCAQMD's regional pollutant thresholds for all pollutants. Thus, the proposed project would not generate construction-related emissions that exceed SCAQMD CEQA thresholds.

Operational Emissions

The proposed project's maximum daily unmitigated operational emissions, as estimated using CalEEMod V.2022.1 are shown in Table 4. The project emissions presented are for the proposed project's first full year of operation, which is presumed to be 2024. As shown in Table 4, the proposed project's maximum daily unmitigated operational emissions would be below the SCAQMD's regional pollutant thresholds for all pollutants.

Table 4: Unmitigated Operational Emissions Estimates (Year 2024)						
Source	Maximum Daily Pollutant Emissions (Pounds Per Day) ^(A)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Project Emissions						
Area	0.2	<0.1	0.3	<0.1	<0.1	<0.1
Energy	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Mobile	1.0	12.3	16.0	0.11	2.5	0.7
Off-Road	0.0	7.9	79.2	0.0	0.0	0.0
Site Subtotal	1.2	20.3	95.6	0.1	2.5	0.7
Existing Site Emissions						
Area	0.4	<0.1	0.4	<0.1	<0.1	<0.1
Energy	<0.1	0.1	0.1	<0.1	<0.1	<0.1
Mobile	0.6	1.2	6.5	<0.1	0.5	0.1
Off-Road	0.0	1.8	17.6	0.0	0.0	0.0
Total Existing Site Emissions	1.0	3.1	24.6	<0.1	0.5	0.1
Total Net Change						
Total Project Emissions ^(B)	0.2	17.2	71.0	<0.1	2.0	0.6
SCAQMD CEQA Threshold	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No
Source: MIG, 2022 (See Appendix A) and SCAQMD, 2019b.(A) Maximum daily ROG, and CO occur during the summer. Maximum daily NO _x emissions occur during the winter. Summer 2023 and Winter 2023 have the same maximum daily SO _x , PM ₁₀ , and PM _{2.5} emissions. See Appendix A.						
(B) Totals may not equal due to rounding.						

In developing its CEQA significance thresholds, the SCAQMD considered the emission levels at which a project's individual emissions would be cumulatively considerable (SCAQMD, 2003; page D-3). As described above the proposed project's construction and operational emissions would be below applicable SCAQMD regional thresholds for criteria air pollutants. Therefore, the proposed project would not result in a cumulatively considerable increase in criteria air pollutants, impacts would be less than significant.

c) **Less than Significant Impact.** The proposed project would generate both short-term construction emissions and long-term operational emissions that could impact sensitive residential receptors located near the project; however, as described in more detail below, the proposed project would not generate short-term or long-term emissions that exceed SCAQMD-recommended localized significance thresholds or result in other substantial pollutant concentrations.

Construction Emissions

The proposed project's maximum daily construction emissions are compared against the SCAQMD's-recommended LSTs in Table 5. The LSTs are for SRA 34 (Central San Bernardino Valley) in which the proposed project is located. Construction emissions were estimated against the SCAQMD's thresholds for a 5-acre project size. A receptor distance of 25 meters was used to evaluate impacts at sensitive receptor locations for construction activities. This is considered to be a conservative approach, since the project would involve grading / site disturbance of approximately 6.93 acres, which is more than 5 acres.

Table 5: Construction Emissions Localized Significance Thresholds Analysis				
Construction Phase	Maximum On-Site Pollutant Emissions (lbs/day)^(A)			
	NO_x	CO	PM₁₀	PM_{2.5}
Demolition	21.0	27.1	0.9	0.8
Site Preparation	24.0	28.3	0.9	0.8
Grading	15.5	20.7	3.4	1.9
Trenching	2.9	3.5	0.1	0.1
Building Construction (Foundation)	9.2	11.3	0.4	0.3
Building Construction (Vertical)	9.8	11.0	0.4	0.3
Building Construction (MEP/Other)	1.5	1.6	0.1	0.1
Paving 2022	8.3	10.7	0.4	0.3
Architectural Coating 2022	0.9	1.2	<0.1	<0.1
Total Emissions	93.1	115.4	6.6	4.6
SCAQMD LST Threshold	270	1,746	14	8
Threshold Exceeded?	No	No	No	No
Source: MIG, 2022 (See Appendix A)				
(A) Emissions presented are worst-case emissions and may reflect summer or winter emissions levels.				

As shown in Table, emissions from construction activities at the project site will not exceed the SCAQMD's-recommended LSTs for SRA 23.

Operational Emissions

The proposed project's maximum daily operational emissions are compared against the SCAQMD's-recommended LSTs in Table. The LSTs are for SRA 34 (Central San Bernardino Valley) in which the proposed project is located. The operational emissions from on-site area, mobile, and off-road emissions sources were estimated against the SCAQMD's thresholds for a 5-acre project size. A receptor distance of 25 meters was used to evaluate impacts at sensitive receptor locations for operational activities.

Table 6: Operational Emissions Localized Significance Thresholds Analysis				
Operational Emission Source	Maximum On-Site Pollutant Emissions (lbs/day)^(A)			
	NO_x	CO	PM₁₀	PM_{2.5}
Project Emissions				
Area	<0.1	0.3	<0.1	<0.1
Energy	<0.1	<0.1	<0.1	<0.1
Mobile ^(B)	1.8	2.4	0.4	0.1
Site Subtotal	1.9	2.7	0.4	0.1
Existing Site Emissions				
Area	<0.1	0.4	<0.1	<0.1
Energy	0.1	0.1	<0.1	<0.1
Mobile ^(B)	0.2	1.0	0.4	0.1
Total Existing Site Emissions	0.3	1.5	0.5	0.1
Total Net Change				
Total On-Site Emissions	1.6	1.2	-0.1	0.0
SCAQMD LST Threshold	270	1,746	4	2
Threshold Exceeded?	No	No	No	No
Source: MIG, 2022 (See Appendix A)				
(A) Emissions presented are worst-case emissions and may reflect summer or winter emissions levels.				
(B) Mobile source emissions are from Table 4. Total on-site mobile source emissions were presumed to be equal to 15% of total mobile emissions estimates.				

As shown in Table 6, emissions from operational activities at the project site will not exceed the SCAQMD's-recommended LSTs for SRA 34.

Additionally, the proposed project would add approximately 105 new vehicle trips (202 PCE trips) to the local roadway infrastructure per day, with 13 and 11 PCE trips added during the AM and PM peak hours, respectively (Urban Crossroad 2022).ⁱ The project is not located in an area where hourly or daily traffic volumes are anywhere close to 44,000 vehicles per hour, the BAAQMD screening threshold, or 100,000 vehicles per day. Furthermore, the project would not add enough trips to result in these hourly or daily traffic volumes either. The proposed project would not cause intersection volumes to exceed any daily (100,000) or hourly (44,000) screening vehicle volumes maintained by the SCAQMD and other regional air districts and, therefore, would not result in significant CO concentrations.

ⁱ PCE trips reflect the impact of large trucks, buses, and recreational vehicles on traffic flow. By their size alone, these vehicles occupy the same space as two or more passenger cars. In addition, the time it takes for them to accelerate and slow down is much longer than for passenger cars, and varies depending on the type of vehicle and number of axles. A PCE factor of 1.5, 2.0, and 3.0 was applied to the 2-, 3-, and 4-axle trucks, respectively, that were associated with the proposed Project (Urban Crossroads 2022).

Toxic Air Contaminant Emissions/Health Risk Assessment

Sensitive receptors are located north and west of the project site. Project-related construction activities would emit PM10 from equipment exhaust. The operation of trucks during operation of the proposed project would also generate PM10 from equipment exhaust during idling and truck operation.

The predicted locations of the annual, unmitigated point of maximum impact (PMI), the maximally exposed individual resident receptor (MEIR), and maximally exposed student receptor (MESR) for DPM exposure during construction are shown in Exhibit 4, along with contours of pollutant concentrations in proximity of the project site. The predicted PMI is located east of the project site, on a section of the adjacent lot that is north of the tavern and south of the crematorium. Since the PMI for DPM exposure is located on land that is not occupied by a receptor on a permanent basis, lifetime excess cancer risks and chronic non-cancer health hazards, which are based on exposure to annual average pollutant concentrations, were not estimated for the modeled PMI location. Accordingly, health risks were assessed at the modeled residential MEIR location, which is located north of the Project site at 27014 West 5th Street. The HRA for residential receptors evaluated worst-case carcinogenic and non-carcinogenic risks to child (3rd trimester, 0-2 years, and 2-16 years) and adult (16-30 years and 30-70 years) receptors.

Potential health risks were also assessed for student receptors at Highland Head Start, west of the project site. The calculated, maximum unmitigated construction risks would be approximately 6.4 excess cancers in a million in Year 1, which corresponds to child receptors that are less than two years old at the start of construction activities. See Appendix A for risks to all age groups. In addition to construction activities, the proposed project would also generate DPM once operational from diesel truck trips to and from the site, as well as their on-site idling. An operational HRA was conducted to evaluate the potential health risks posed by these activities. Whereas construction activities would only last approximately one year, the proposed project's operational activities would continue to occur year after year until the project site is redeveloped or utilized for purposes other than warehousing. Health risks from construction and operational activities are presented in Table 7 for the MEIR and MESR.

Table 7: Unmitigated Cancer Risk at PMI, MEIR, and MESR							
Receptor	UTM Location		Annual Average DPM Concentration ($\mu\text{g}/\text{m}^3$)^(A)		Excess Cancer Risk (per million population)		
	Easting	Northing	Construction	Operational	Construction	Operational	Total^(B)
PMI ^(C)	480098.47	3774118.22	0.16225	0.00248	--	--	--
MEIR	480145.05	3774199.61	0.03894	0.00101	6.4	0.6	7.0
MESR	479926.65	3774131.09	0.05946	0.00036	2.6	0.0	2.7
Source: MIG, 2022 (see Appendix C)							
(A) The annual average DPM operational concentration is based on the first full year of operation (Year 2).							
(B) Totals may not equal due to rounding.							
(C) The PMI is located at the adjacent commercial property, which is not occupied by a long-term sensitive receptor.							

The average cancer risk based on the lifetime exposure scenario (70 years), is 3.21E-06 (approximately 3.21 cases per million people). The product of cancer risk and the estimated population (529) is 0.001696 and does not exceed the SCAQMD threshold of 0.5 excess cancer cases. Additionally, the maximum annual average DPM concentration at any receptor location would be approximately 0.05177 $\mu\text{g}/\text{m}^3$, which would occur at the MESR location. Based on the chronic inhalation REL for DPM (5 $\mu\text{g}/\text{m}^3$),

the calculated chronic hazard quotient during the maximum exposure to DPM concentration would be 0.01, which is below the SCAQMD's non-cancer hazard index threshold value of 1.0. All other receptor exposure scenarios would result in a non-carcinogenic hazard index less than 0.01. Exposure of substantial pollutant concentrations to sensitive receptors due to project construction and operations would be less than significant.

d) **Less than Significant Impact.** According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints include agricultural operations, wastewater treatment plants, landfills, and certain industrial operations (such as manufacturing uses that produce chemicals, paper, etc.). The proposed project would result in the construction of a new industrial uses that could generate odors related to equipment use (e.g., oils, lubricants, fuel vapors); however, these activities would generally be located across the road from the nearest sensitive receptors, giving potentially odorous compounds time and space to disperse. The activities proposed as part of the project would not generate sustained odors that would affect substantial numbers of people, nor nearby sensitive receptors; as such, impacts related to odors will be less than significant.

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Exhibit 4 Modeled Operational Annual Average DPM Conc. (µg/m³)

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CHIPT Highland West Warehouse Building and Office Space
Highland, California

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4.4 Biological Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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A *General Biological Resources Assessment and the Burrowing Owl Survey Report* of the project site was prepared by MIG in September 2022. The information presented is condensed from the Reports and is available for viewing as Appendix B and the Burrowing Owl Survey Report is in Appendix J.

a) **Less than Significant with Mitigation Incorporated.** Consistent with the requirements of CEQA and local regulations, the significance of potential impacts is evaluated through the application of the significance criteria described above. The objective of the biological resources analysis is to identify potential adverse effects and/or significant impacts on biological resources. Avoidance is often the preferred approach for the management of biological resources; however, it is not always possible to completely avoid impacts. Recommendations to avoid or minimize impacts are identified, as appropriate, including procedures to be followed if significant biological resources are identified prior to the initiation of construction. Below are the findings of the biological report and recommendations where applicable.

Special-Status Plants

No special-status plant species are expected to be present on the project site due to the extent of current development and subsequent lack of suitable habitat; therefore, no impacts to special-status plants are anticipated as a result of project implementation, and no further mitigation is required.

Special Status Wildlife Species

Special-status wildlife species include those species listed as endangered or threatened under the Federal Endangered Species Act (FESA) or the California Endangered Species Act (CESA); candidates for listing by the U.S. Fish and Wildlife Services or California Department of Fish and Wildlife (USFWS & CDFW respectively); and species of special concern to the CDFW; and birds protected by the CDFW under California Fish and Game Code (CFGC) Sections 3503 and 3513.

Nesting Birds

Native and ornamental trees, as well as various other vegetation on the project site, have the potential to provide nesting habitat for bird species protected by the California Fish and Game Code (CFGC) Sections 3503 and 3513. There is potential for ground- and tree-nesting birds to establish nests on the project site prior any project-related construction. Construction activities including site mobilization, tree removal, other vegetation clearing, grubbing, grading, and noise and vibration from the operation of heavy equipment have the potential to result in significant direct (i.e., death or physical harm) and/or indirect (i.e., nest abandonment) impacts to nesting birds. The loss of an active nest of common or special-status bird species and/or their eggs or young as a result of project construction would be considered a violation of the CFGC, Section 3503, 3503.5, 3513 and therefore, would be considered a potentially significant impact. Implementation of **Mitigation BIO-1** would be required to reduce impacts to nesting birds to a less than significant level.

Burrowing Owl

Pipes and other round structures present on the property provide habitat for burrowing owl. Suitable habitat type (Disturbed and/or Developed) for burrowing owl was also determined to be present on-

site, and burrowing owl are known to occur less than one mile from the construction site. Construction activities may impact burrowing owl in a manner like those already described under “Nesting Birds” for nesting birds. **Mitigation BIO-2** would be required to reduce impacts to burrowing owl to a less than significant level (See Appendix J).

Roosting Bats

The project site provides suitable roosting (i.e., trees and abandoned structures) and foraging (i.e., open habitat) habitat for the rare pallid bat as well as other common bat species protected under California Fish and Game Code. The proposed project would include the removal of trees and structures that could be occupied by roosting bats. **Mitigation BIO-3** would prevent potential impacts to roosting bats from the proposed project.

No other special-status wildlife species are expected to be impacted by project construction due to a lack of suitable habitat and high degree of site disturbance due to existing development within and surrounding the project site. No impacts are expected to Critical Habitat for San Bernardino Kangaroo Rat (SBKR), that is adjacent to the project (see Figure 5). Per correspondence with the U.S. Fish and Wildlife Service (USFWS), it was determined that the existing site was “isolated...and has no direct access to either potential or known SBKR habitat,” and that a trapping and small mammal report were not warranted (See Appendix B).

Mitigations

BIO-1 Pre-construction Surveys for Nesting Birds. Construction activities should be scheduled to avoid the nesting season. If construction activities are scheduled to take place outside the nesting season, all impacts to nesting birds protected under the MBTA and California Fish and Game Code would be avoided. The nesting season for most birds in San Bernardino County extends from February 1 through September 1.

If construction activities are required to be scheduled between September 1 and January 31, then pre-construction surveys for nesting birds will be conducted by a qualified biologist to ensure that no nests would be disturbed during project implementation. These surveys will be conducted no more than 5 days prior to the initiation of any site disturbance activities and equipment mobilization, including tree, shrub, or vegetation removal, fence installation, grading, etc. If project activities are delayed by more than 5 days, an additional nesting bird survey will be performed. During this survey, the biologist will inspect all trees and other potential nesting habitats (e.g., trees and shrubs) in and immediately adjacent to the impact area for nests. Active nesting is present if a bird is building a nest, sitting in a nest, a nest has eggs or chicks in it, or adults are observed carrying food to the nest. The results of the surveys will be documented.

If an active nest is found sufficiently close to work areas to be disturbed by these activities, the qualified biologist will determine the extent of a construction-free buffer zone to be established around the nest (typically up to 300 feet for raptors and up to 100 feet for other species), to ensure that no nests of species protected by the MBTA and California Fish and Game Code will be disturbed during project implementation. Within the buffer zone, no site disturbance and mobilization of heavy equipment, including but not limited to equipment staging, fence installation, clearing, grubbing, vegetation removal, demolition, and grading will be permitted until the chicks have fledged.

A qualified biologist is an individual who has a degree in biological sciences or related resource management with a minimum of two seasonal years post-degree experience

conducting surveys for nesting birds. During or following academic training, the qualified biologist will have achieved a high level of professional experience and knowledge in biological sciences and special-status species identification, ecology, and habitat requirements.

BIO-2 Pre-construction Surveys for Burrowing Owl. No more than 14 days prior to ground disturbance a focused survey for burrowing owl will be required to ensure take avoidance. Even though burrowing owls were not located as part of the general biological survey, a pre-construction survey for burrowing owl is required because burrowing owls may encroach or migrate to the property at any time, and therefore steps should be taken to ensure avoidance, including reevaluating the locations/presence of burrowing owl or burrows. Pre-construction surveys shall be conducted in accordance with the survey requirements outlined in Appendix D of the CDFW's *Staff Report on Burrowing Owl Mitigation*, dated March 7, 2012. If burrowing owl are found on the project site during pre-construction surveys, the biologist conducting surveys shall immediately contact the CDFW to develop a plan for avoidance and/or translocation prior to construction crews initiating any ground disturbance on the project site.

BIO-3: Roosting Bats. Before the start of construction-related activities (including but not limited to mobilization and staging, clearing, grubbing, tree removal, vegetation removal, fence installation, demolition, and grading), a survey of structures and tree cavities suitable for roosting bats and other roost habitats should be conducted within the project footprint, including a 50-foot buffer, by a qualified biologist within 30 days before commencement of any site disturbance activities and equipment mobilization. If suitable structures, tree cavities, or other roost habitats are found, an emergence survey of the cavities should be conducted by a qualified biologist for colony bat roosts before the onset of construction-related activities. If a rare bat species, an occupied maternity, or a colony roost is detected, CDFW shall be consulted to determine appropriate measures, such as bat exclusion methods, if the roost cannot be avoided. The results of the surveys shall be documented. Echolocation surveys may be needed to verify the presence of bats, or an exclusion zone around the occupied tree may be recommended until bats leave the roost. The qualified bat biologist should be contacted immediately if a bat roost is discovered during project construction.

b) **No Impact.** The biological report includes an overview of potential USACE, RWQCB, CDFW riparian/riverine/vernal pool jurisdictional resources. No riparian vegetation subject to regulation by the USACE, CDFW, or RWQCB are present on the project site. No such features were detected by the National Wetlands Inventory (as shown on Figure 6 of the biological report) at or near the project site. There will be no impacts to such resources.

c) **No Impact.** The biological report includes an overview of potential USACE, RWQCB, CDFW riparian/riverine/vernal pool jurisdictional resources. No waterways or wetlands subject to regulation by the USACE, CDFW, or RWQCB are present on the project site. No such features were detected by the National Wetlands Inventory (as shown on Figure 6) at or near the project site. There is an ephemeral stream immediately north of the project site that terminates at a storm drain, and there is no evidence (e.g., watermarks, vegetation, or other characteristics) that water flows from this stream enter the project site.

d) **No Impact.** Providing functional habitat connectivity between natural areas is essential to sustaining healthy wildlife populations and allowing for the continued dispersal of native plant and animal species. The regional movement and migration of wildlife species has been substantially altered due to habitat fragmentation over the past century. This fragmentation is most commonly caused by development of open areas, which can result in large patches of land becoming

inaccessible and forming a functional barrier between undeveloped areas. Additional roads associated with development, although narrow, may result in barriers to smaller or less mobile wildlife species. Habitat fragmentation results in isolated islands of habitat, which affects wildlife behavior, foraging activity, reproductive patterns, immigration and emigration or dispersal capabilities, and survivability. Wildlife corridors can consist of a sequence of stepping-stones across the landscape (i.e., discontinuous areas of habitat such as isolated wetlands), continuous lineal strips of vegetation and habitat (e.g., riparian strips and ridge lines), or they may be parts of larger habitat areas selected for its known or likely importance to local wildlife. The project site does not act as a wildlife movement corridor due to the current built environment as well as the presence of urban/suburban development surrounding the site. The project site is expected to be utilized by common, non-special-status wildlife for foraging and possibly breeding. However, the project site is situated in an urbanized area and does not represent a wildlife movement corridor as it is bound on all sides by residential and industrial land uses and therefore does not preclude wildlife movement in otherwise open areas. There will be no impacts to wildlife species' movement and use of wildlife corridors and nursery sites.

e) **Less than Significant Impact.** The project will not conflict with local policies or ordinances protecting biological resources. Based on preliminary site plans some trees will need to be removed to accommodate current building designs. Such a removal will not conflict with a biological preservation policy or ordinance established by the City Municipal Code, impacts will be less than significant.

f) **No Impact.** The purpose of the biological report is to document the existing biological resources, identify general vegetation types, and assess the potential biological and regulatory constraints associated with the proposed development within the project site. The project site is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other local, regional, or state habitat conservation plan.

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Source: EIR, USFWS, May, 2022

Legend
 ■ Highland West
 ■ USFWS Final Critical Habitat

0 450 900 1,800 Feet

Figure 5. USFWS Critical Habitat Map
 Highland West
 Highland, CA
 CHIPT Highland 210, L.P.

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Source: ESRI, USFWS, AIG, 2022

Legend
 Highland West

NWI Wetland Types:

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other
- Riverine

0 450 900 1,800 Feet



Figure 6. National Wetlands Inventory Map
 Highland West
 Highland, CA

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4.4 – Cultural Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to '15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A Historical/Archaeological Resource Survey was conducted to assess possible cultural and historical impacts associated with the construction and operation of the project. The survey was prepared by CRM Tech on November 7th, 2022 and is attached as Appendix I.

a) **No Impact.** CEQA Guidelines state the term “historical resources” applies to resources that meet any of the criteria for listing on the California Register of Historical Resources.

- (1) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
- (2) Is associated with the lives of persons important in our past.
- (3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- (4) Has yielded, or may be likely to yield, information important in prehistory or history. (PRC §5024.1(c)).

No potential “historical resources” were previously recorded in and around the project area, and none were identified during the survey. No remains of a building built before 1938 were found, and buildings occupying the property date between 1978-1983, and as such do not meet the established 50-year age threshold for potential “historical resources” The project would result in no adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5, no impacts will occur.

b) **Less than Significant Impact with Mitigation Incorporated.** According to the records search and site visits conducted through the Survey, the project site does not include any structure that could be considered historic in nature. Therefore, the project would result in no adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5. In the event that previously unknown archaeological materials are discovered, **Mitigation CUL-1** has been incorporated to ensure that any such materials are protected until properly evaluated. As such, the project will have no impact on historical resources.

CUL-1: Buried Cultural Resources. If buried cultural materials are discovered inadvertently during any earth-moving operations associated with the project, all work within 50 feet of the discovery should be halted or diverted until a qualified archaeologist can evaluate the nature and significance of the finds

c) **Less than Significant Impact.** There are no existing or known cemeteries on or adjacent to the project site. As a result, project implementation is not anticipated to impact human remains associated with a cemetery. In the event that any human remains or related resources are discovered, such resources would be treated in accordance with all applicable federal, state, and local regulations and guidelines for disclosure, recovery, relocation, and preservation, including California Health and Safety Code Section 7050.5, which states that no further disturbance shall occur until the county coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. Under these provisions, the coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or their authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the Native American Heritage Commission. Therefore, with compliance with California Health and Safety Code Section 7050.5 and Public Resources Code 5097.98, impacts associated with human remains would be less than significant.

4.5 – Energy

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption or energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

An Energy and Greenhouse Gas Impact Analysis Report was prepared to evaluate the potential energy and greenhouse gas impacts associated with the construction and operation of the proposed project. This report is consistent with the guidance and recommendations contained in the South Coast Air Quality Management District's (SCAQMD) California Environmental Quality Act (CEQA) Air Quality Handbook. The information presented below is condensed from the report prepared by MIG September 2nd, 2022 and is attached as Appendix C.

a) **Less than Significant Impact.** Implementation of the proposed project would result in the consumption of electricity, natural gas, and petroleum fuels during construction and operation of the business park / warehousing land uses.

Electricity

Construction. Electric power would be required for lighting and electronic equipment (e.g., computers) located in trailers used by the construction crew. In addition, the project would consume electricity through construction equipment (i.e. an electric generator and forklifts) and worker trips. Project construction is estimated to require approximately 453 kWh of electricity for construction equipment and 1,223 kWh of electricity for worker trips. However, the electricity used would be temporary and would have a negligible contribution to the project's overall energy consumption.

Operational. During operation of the new industrial facility, the project would consume electricity from appliance operation, general building systems (e.g., lighting, HVAC equipment), and outdoor lighting. Based on estimates generated by CalEEMod, the proposed project would consume approximately 245,021 kWh per year of electricity. The proposed project would be required to comply with the standards contained in the CalGreen Code (i.e., Part 11 of the Title 24 Building Code) that requires the industrial facility building constructed at the site meet energy efficiency standards that improve upon those from previous years.

Electricity would also be consumed by the operation of electric vehicles by future workers and customers traveling to and from the site. As estimated in CalEEMod, based on the trip generation rates and trip distances provided for in the Urban Crossroads traffic memorandums / SCAQMD guidance

document, the proposed project is anticipated to generate approximately 2,307,609 VMT on an annual basis. The average fuel economies and vehicle fleet mix attributable to the proposed project were used to estimate the amount of electricity consumed from vehicle trips associated with the proposed project. The project is estimated to consume approximately 103,254 kWh of electricity from fuel consumption on an annual basis.

The proposed project would also indirectly benefit from other, regulatory actions taken at the state level. For example, SB 100 requires 60% of the power purchased by California come from renewable sources by 2030. SB 100 further requires all retail electricity be carbon-free by 2045. Based on these state-wide mandates, electricity consumed at the site will become more and more green (e.g., not requiring the burning of fossil fuels), which will lead to the more efficient use of energy resources.

Although electricity would increase at the site under implementation of the project, the proposed facility would be designed to the 2022 Title 24 Building Code standards, and benefit from other actions taken at the State level. Furthermore, as discussed in Section 2.3.4 of the Energy and GHG Report, the proposed project includes site features that support the future installation of the electrical infrastructure necessary to support EV charging at truck docks in the future, which would support the transition to zero emission trucks / near zero emission trucks over the next few decades. For these reasons, the electricity consumed by the project is not considered to be inefficient or wasteful, as such, impacts will be less than significant.

Natural Gas

Construction. Natural gas consumption is not anticipated during construction of the project. Fuels used for construction would generally consist of diesel and gasoline, which are discussed in the next subsection. Any amount of natural gas that may be consumed during project construction would be nominal and would have a negligible contribution to the project's overall energy consumption.

Operational. Natural gas consumption would be required during operation of the project for various purposes, such as hot water and building HVAC. Based on estimates generated by CalEEMod, the proposed project would consume approximately 167,314 kBtu per year of natural gas. Although natural gas consumption would increase at the site under implementation of the project, the building envelope, HVAC, lighting, and other systems, would likely be more efficient than other industrial facilities in the area, because of the energy efficiency requirements outlined in the 2022 Title 24 Building Code. For these reasons, the natural gas that would be consumed by the project is not considered to be inefficient or wasteful, and impacts will be less than significant.

Diesel and Gasoline Fuel

Construction. Diesel and gasoline fuels, also referred to as petroleum in this subsection, would be consumed throughout construction of the project. Fuel consumed by construction equipment would be the primary energy resource consumed over the course of construction, and VMT associated with the transportation of construction materials (e.g., deliveries to the site) and worker trips to and from the site would also result in petroleum consumption. Whereas on-site, heavy-duty construction equipment and delivery trucks would predominantly use diesel fuel, construction workers would generally rely on gasoline-powered vehicles to commute to and from the project site.

The operation of heavy-duty, off-road equipment associated with project construction would consume approximately 21,844 gallons of diesel fuel. Worker, vendor, and hauling trips associated with project construction are estimated to consume approximately 5,802 and 1,333 gallons of gasoline and diesel

fuel, respectively. In total, project construction is estimated to require approximately 5,802 gallons of gasoline and 23,177 gallons of diesel total.

On- and off-road petroleum-powered vehicles/equipment would be subject to various rules and regulations at the federal and state levels. On the federal level, on-road vehicles would be subject to the SAFE Vehicles Rule. On the state level, off-road equipment at the site would also be required to comply with CARB's Airborne Toxic Control Measures, which restricts heavy-duty diesel vehicle idling to five minutes. In addition, the efficiency of petroleum use is related to numerous other state-wide regulations and programs, such as the LCFS (on- and off-road vehicles/equipment), ACC Program (on-road passenger vehicles), and ACT Program (on-road trucks). In addition, on the local level (i.e., immediate Project-level) project design features contained in the Air Quality and Health Risk Assessment Report prepared for the proposed project, would require the use of later engine model years (i.e., equipment meeting U.S. EPA and CARB Tier III Final Emission Standards). Since petroleum use during construction would be temporary and is a necessary component when conducting development activities, it would not be wasteful or inefficient, and impacts will be less than significant.

Operational. Gasoline and diesel would be consumed during operation of the proposed project. Both forms of petroleum fuel would be consumed from future workers and customers traveling to and from the site. As estimated in CalEEMod, based on the trip generation rates and trip distances provided for in the Urban Crossroads traffic memorandums / SCAQMD guidance document, the proposed project is anticipated to generate approximately 2,307,609 VMT on an annual basis. Based on the average fuel economies and vehicle fleet mix attributable to the proposed project, vehicle trips associated with the proposed project are estimated consume approximately 73,891 and 16,126 gallons of gasoline and diesel, respectively, on an annual basis. These fuel consumption estimates are based on vehicle efficiency in 2024, and would decrease in future years as trucks become more fuel efficient and ZEV trucks are more commonly available and used within San Bernardino County.

There are numerous regulations in place that require and encourage fuel efficiency. For example, CARB has adopted an approach to passenger vehicles by combining the control of smog-causing pollutants and GHG emissions into a single, coordinated package of standards. The approach also includes efforts to support and accelerate the number of plug-in hybrids and ZEVs in California. In addition, per the requirements identified in SB 375, CARB adopted a regional goal for the SCAG region of reducing per-capita GHG emissions from 2005 levels by 8% by 2020 and 19% by 2035 for light-duty passenger vehicles. The SB 375 goal would help reduce emissions from worker and customers trips at the site. The proposed project would also benefit from actions taken at the state level with regard to the ACT Program and Sustainable Freight Plan. The implementation of these programs will help reduce the number of diesel trucks on California roadways and improve the fuel efficiency of those diesel trucks that remain in operation. Accordingly, operation of the project is expected to decrease the amount of petroleum it consumes in the future due to advances in fuel economy.

Although the project would increase petroleum use in the region during construction and operation, the use would be a small fraction of the statewide use and would have its overall fuel consumption decrease over time. As such, petroleum consumption associated with the project would not be considered inefficient or wasteful, and as such, impacts will be less than significant.

b) **Less than Significant Impact.** The proposed project would not conflict with nor obstruct a state or local plan adopted for the purposes of increasing the amount of renewable energy or energy efficiency. As discussed above, the project would be subject to the California Title 24 Building Code energy efficiency standards for non-residential buildings, which would help reduce energy consumption. Equipment and vehicles associated with construction and operation of the project would also be subject to fuel standards at the state and federal level. The project would inherently benefit from programs

implemented to achieve the goals of the Sustainable Freight Plan, such as the turnover of older, less fuel-efficient trucks, as fuel economy standards are rolled out and ZEV trucks becomes more widely available and cost effective for business. The project would not conflict with nor obstruct a state or local plan for renewable energy or energy efficiency, impacts will be less than significant.

4.6 – Geology and Soils

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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A Geotechnical Investigation was prepared to evaluate the potential geological, soil, and seismic impacts of the proposed project, and the associated conditions of the project site. This Report is consistent with the guidance and recommendations contained in the California Environmental Quality Act. The report was prepared by Southern California Geotechnical in June of 2022 and updated August 29th, 2022, and is available attached as Appendix G. The information presented below is provided in full in the aforementioned report.

a.i) **Less than Significant Impact.** The project site is not located in a known fault zone, however the City of Highland is intersected and neighbored by fault lines.⁷ The southern branch of the San Andreas fault runs through the northern portion of Highland through the San Bernardino Mountains. The project site is southwest of this fault zone. Additionally, the San Jacinto fault zone is located approximately 4.5 miles southwest of the City of Highland, the project site is northeast of this fault. The project is located in an area subject to strong ground shaking from earthquakes, and significant damage to structures during a large earthquake may be unavoidable.⁸ Structures should be designed to resist collapse and provide reasonable protections from injury. Adhering to the design and repair requirements adopted from the 2019 California Building Code (CBC)⁹ will be sufficient for mitigating any potential impacts, and as such, impacts are determined to be less than significant.

a.ii) **Less than Significant Impact.** The Project site is subject to ground shaking given its proximity to fault zones and Southern California location. Per the City's General Plan, the potential for ground shaking and seismic-related damages are less significant the farther a development is from the San Andreas fault zone.¹⁰ The proposed project site is approximately 4.5 miles away from the fault line. The project is subject to the seismic design standards of the CBC, and while structures may be damaged during earthquakes, adherence to these design requirements will minimize damage to property within the structure, as they are designed to not collapse. The CBC is intended to provide minimum requirements to prevent major structural failure and loss of life. Impacts due to strong ground shaking would be less than significant.

a.iii) **Less than Significant Impact.** Liquefaction is a form of ground failure that occurs when soil transforms from a solid state to liquefied condition due to intense seismic ground shaking. Liquefaction typically occurs in loose granular materials, with saturated silt and clay contents, at shallow groundwater tables less than 50 feet from the surface. Part of the City of Highland is susceptible to liquefaction and ground failure from seismically induced ground shaking. However, the City's General Plan indicates that the project site is not located in an area with a high susceptibility to liquefaction.¹¹ Most of Highland, including the project site, is located over the San Bernardino portion of the Upper Santa Ana Valley groundwater basin, also referred to as the Bunker Hill Subbasin.¹² Groundwater wells in Highland near the Project site have been recorded as having a depth below ground surface between 200 and 500 feet, significantly deeper than lands typically susceptible to liquefaction and ground failure.¹³ A geotechnical study prepared for this project indicates that neither the project site or the subsurface boring locations are susceptible to liquefaction.¹⁴ Subsidence will occur in soils below the zone of removal during construction operations. Ground subsidence is estimated to be 0.1 feet, but the true amount will be variable, and is dependent on the type of construction machinery used and its frequency of use.¹⁵ Impacts will be less than significant per the geotechnical study.

a.iv) **No Impact.** The City's General Plan outlines areas in Highland susceptible to landslides; the Project site is generally flat and not located in an area with a high susceptibility to landslide or ground subsidence.¹⁶ Impacts will be less than significant.

b) **Less than Significant Impact.** Topsoil is used to cover surface areas for the establishment and maintenance of vegetation due to its high concentrations of organic matter and microorganisms. The Project site is located in an already developed area of Highland, although there is the potential to expose surface soils to wind and water erosion during construction activities. However, wind erosion would be minimized through soil stabilization measures required by SCAQMD Rule 403 (Fugitive Dust), such as daily watering. Water erosion would be prevented through the City's standard erosion control practices required pursuant to the CBC and the National Pollution Discharge Elimination System (NPDES) regulations, such as silt fencing, fiber rolls, or sandbags. Following Project construction, the site itself would consist of mostly impervious surfaces and landscaping. Impacts related to soil erosion would be less than significant with implementation of existing regulations.

c) **Less than Significant Impact.** Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The downslope movement is due to a combination of gravity and ground shaking. Lateral spreading has been observed to generally take place toward a free face (i.e. retaining wall, slope, or channel) and to lesser extent on ground surfaces with a very gentle slope. As previously discussed, the Project site is in an area with a low susceptibility to liquefaction, and thus a low potential for lateral spreading to occur on the Project site. The Project site is located in a flat developed area, and any soil instability on the Project site would not be cause for a landslide. A geotechnical investigation conducted on the project site determined that development was feasible with consideration to seismic design standards outlined in the CBC.¹⁷ The project is required to be constructed in accordance with the CBC, and keeping in compliance with existing CBC regulations would limit hazard impacts arising from unstable soils to less than significant levels.

d) **No Impact.** A geotechnical study conducted determined that near-surface soils in the project site are non-expansive, and so there are no design considerations warranted for expansive soils.¹⁸ No impacts will occur.

e) **No Impact.** The Project proposes to connect to the existing municipal sewer system.¹⁹ The proposed Project would connect to this system and would not require use of septic tanks. No impact will occur.

f) **Less than Significant with Mitigation Incorporated.**

4.7 – Greenhouse Gas Emissions

Would the project:

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

An Energy and Greenhouse Gas Impact Analysis Report was prepared to evaluate the potential energy and greenhouse gas impacts associated with the construction and operation of the proposed project. This Report is consistent with the guidance and recommendations contained in the South Coast Air Quality Management District's (SCAQMD) California Environmental Quality Act (CEQA) Air Quality Handbook. The report was prepared by MIG September 2nd, 2022 and is available attached as Appendix C. The information presented below is provided in full in the aforementioned report.

a) **Less than Significant Impact.** Gases that trap heat in the atmosphere and affect regulation of the earth's temperature are known as GHG. Many chemical compounds found in the earth's atmosphere exhibit the GHG property. GHG allow sunlight to enter the atmosphere freely. When sunlight strikes the earth's surface, it is either absorbed or reflected back toward space. Earth that has absorbed sunlight warms up and emits infrared radiation toward space. GHG absorb this infrared radiation and "trap" the energy in the earth's atmosphere.

GHG that contribute to climate regulation are a different type of pollutant than criteria or hazardous air pollutants because climate regulation is global in scale, both in terms of causes and effects. Some GHG are emitted to the atmosphere naturally by biological and geological processes such as evaporation (water vapor), aerobic respiration (carbon dioxide), and off-gassing from low oxygen environments such as swamps or exposed permafrost (methane); however, GHG emissions from human activities such as fuel combustion (e.g., carbon dioxide) and refrigerants use (e.g., hydrofluorocarbons) significantly contribute to overall GHG concentrations in the atmosphere, climate regulation, and global climate change. Human production of GHG has increased steadily since pre-industrial times (approximately pre-1880) and atmospheric carbon dioxide concentrations have increased from a pre-industrial value of 280 ppm in the early 1800's to 419 ppm in July 2022.

The 1997 United Nations' Kyoto Protocol international treaty set targets for reductions in emissions of four specific GHG – carbon dioxide, methane, nitrous oxide, and sulfur hexafluoride – and two groups of gases – hydrofluorocarbons and perfluorocarbons. These GHG are the primary GHG emitted into the atmosphere by human activities. Water vapor is also a common GHG that regulates the earth's temperature; however, the amount of water vapor in the atmosphere can change substantially from day to day, whereas other GHG emissions remain in the atmosphere for longer periods of time. Black carbon consists of particles emitted during combustion; although a particle and not a gas, black carbon also acts to trap heat in the Earth's atmosphere. The six common GHG are described below.

- **Carbon Dioxide (CO₂).** CO₂ is released to the atmosphere when fossil fuels (oil, gasoline, diesel, natural gas, and coal), solid waste, and wood or wood products are burned.
- **Methane (CH₄).** CH₄ is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in municipal solid waste landfills and the raising of livestock.
- **Nitrous Oxide (N₂O).** N₂O is emitted during agricultural and industrial activities, as well as during combustion of solid waste and fossil fuels.
- **Sulfur Hexafluoride (SF₆).** SF₆ is commonly used as an electrical insulator in high voltage electrical transmission and distribution equipment such as circuit breakers, substations, and transmission switchgear. Releases of SF₆ occur during maintenance and servicing as well as from leaks of electrical equipment.
- **Hydrofluorocarbons (HFCs) and Perfluorocarbons (PFCs).** HFCs and PFCs are generated in a variety of industrial processes. Although the amount of these gases emitted into the atmosphere is small in terms of their absolute mass, they are potent agents of climate change due to their high global warming potential.

GHG can remain in the atmosphere long after they are emitted. The potential for a particular greenhouse gas to absorb and trap heat in the atmosphere is considered its global warming potential (GWP). The reference gas for measuring GWP is CO₂, which has a GWP of one. By comparison, CH₄ has a GWP of 28, which means that one molecule of CH₄ has 28 times the effect on global warming as one molecule of CO₂. Multiplying the estimated emissions for non-CO₂ GHG by their GWP determines their CO₂ equivalent (CO₂e), which enables a project's combined GWP to be expressed in terms of mass CO₂ emissions.

Project GHG Emissions

The proposed project would generate GHG emissions from both short-term construction and long-term operational activities. As described in more detail below, the proposed project would not generate short-term or long-term emissions that exceed the SCAQMD GHG interim threshold of 10,000 Metric Tons of Carbon Dioxide equivalent (MTCO₂e) per year or the project-specific goal of 6,000 MTCO₂e per year.

Construction activities would generate GHG emissions primarily from equipment fuel combustion as well as worker, vendor, and haul trips to and from the project site during demolition, site preparation, grading, building construction, paving, and architectural coating activities. Construction activities would cease to emit GHG upon completion, unlike operational emissions that would be continuous year after year until the project is decommissioned. Accordingly, the SCAQMD recommends amortizing construction GHG emissions over a 30-year period and including with operational emissions estimates. This normalizes construction emissions so that they can be grouped with operational emissions and compared to appropriate thresholds, plans, etc. GHG emissions from construction of the proposed project were estimated using CalEEMod, Version 2022.1, based on the anticipated construction schedule and construction activities described in Section 2.4. The proposed project's total construction emissions, as estimated using CalEEMod V.2022.1, are shown in Table 8 below.

Table 8: Project Construction GHG Emissions

Source	Annual GHG Emissions (MT / Year)			
	CO ₂	CH ₄	N ₂ O	TOTAL MTCO ₂ e
2023	294	<0.1	<0.0	298
Amortized GHG Estimate ^(A)	9.8	<0.1	0.0	9.9
Source: MIG, 2022 (see Appendix A)				
(A) Emissions are amortized over the life of the Project, which is presumed to be 30 years.				

Once operational, the proposed project would generate emissions of GHG from area, energy, mobile, water/wastewater, and solid waste sources. The proposed project's operational GHG emissions are shown in Table 9.

Table 9: Project Operational GHG Emissions				
Emission Source	GHG Emissions (MT / Year)			
	CO₂	CH₄	N₂O	CO₂e
Project Emissions				
Area	.01	<0.1	<0.1	0.1
Energy	83.8	<0.1	<0.1	84.3
Mobile	1,967	0.2	0.3	2,053
Waste	12.3	1.23	0.0	43.0
Water	47.5	1.1	<0.1	82.8
Off-Road	0.0	0.0	0.0	0.0
Amortized Construction	9.5	<0.1	<0.1	9.6
Site Subtotal ^(A)	2156.5	2.5	0.3	2309.6
Existing Site Emissions				
Area	0.2	<0.1	<0.1	0.2
Energy	80.0	<0.1	<0.1	80.4
Mobile	246	<0.1	<0.1	252.0
Waste	2.8	0.1	<0.1	3.9
Water	0.0	0.1	<0.1	6.0
Off-Road	46.0	<0.1	<0.1	46.1
Total Existing Site Emissions ^(A)	377.0	0.2	<0.1	389.0
Total Net Change				
Total Project Emissions ^(A)	1779.5	2.3	0.3	1920.6
SCAQMD 2020 Interim Threshold				10,000
Project-specific 2030 GHG Emissions Goal				6,000
SCAQMD Interim Threshold or Project-specific Goal Exceeded?				No
Source: MIG 2022 (see Appendix A).				
(A) Totals may not equal due to rounding.				

As shown in Table 9, the proposed project's potential increase in GHG emissions would be below the SCAQMD's 2020 interim threshold for industrial land uses of 10,000 MTCO₂e per year, as well as the project-specific goal of 6,000 MTCO₂e that demonstrates progress toward the State's 2030 GHG emission reduction goals. Therefore, the proposed project would not generate GHG emissions that have the potential to exceed SCAQMD thresholds. Impacts will be less than significant.

b) **Less than Significant Impact.** The proposed project would not conflict with CARB's Scoping Plan, Sustainable Freight Plan, ACT Program, or regional RTP/SCS. The project's consistency with these plans is described in more detail below.

CARB Scoping Plan

The *2017 Climate Change Scoping Plan* is CARB's primary document used to ensure State GHG reduction goals are met. The *2017 Climate Change Scoping Plan's* primary objective is to identify the measures needed to achieve the 2030 reduction target established under Executive Order B-30-15 and SB 32. The major elements of the plan are generally geared toward actions either CARB or other state entities will pursue, such as, but not limited to:

- Implementation of the Post-2020 Cap and Trade Program
- Implementation of the LCFS, with an increased stringency (18 percent by 2030);
- Implementation of SB 350, which expands the RPS to 50 percent and doubles energy efficiency savings; and
- Implementing the proposed Short-Lived Climate Pollutant Strategy, which focuses on reducing CH₄ and hydrocarbon emissions by 40 percent and anthropogenic black carbon emissions by 50 percent by the year 2030.

Many of the measures identified in the *2017 Scoping Plan Update* are not applicable at the proposed project level, such as the Cap-and-Trade Program that applies to all large industrial GHG emitters (industrial sources emitting more than 25,000 MTCO₂e/year), or the reduction in GHG emissions associated with electricity utility generators. Although most of these measures would be implemented at the State level, the GHG reductions achieved by these state measures would be realized at the local level. For example, regardless of actions taken by the County, emissions generated through gasoline combustion in motor vehicles within the County of San Bernardino would produce less GHG in 2030 than they do now.

In addition to State measures, Appendix B to CARB's *2017 Scoping Plan Update* identifies potential actions that could be undertaken at a local level to support the State's climate goals. This appendix is organized into two categories Category A applies to code and broad planning documents and is not applicable to the proposed project. Category B includes measures that could be considered for individual projects. The proposed project is consistent with many of the suggested measures in Appendix B through required compliance with SCAQMD rules and the California Green Building Standards Code. The project, therefore, would not conflict with the goals of the *2017 Scoping Plan Update*.

Sustainable Freight Plan and Act Program

The proposed project would not conflict with either the Sustainable Freight Plan nor the ACT Program. Although the proposed project would include the use of diesel trucks during operation, the Sustainable Freight Plan and ACT Program would be implemented at the state-level. Furthermore, the proposed project includes sites features that support the future installation of the electrical infrastructure necessary to support EV charging at truck docks in the future, which would support the transition to zero emission trucks / near zero emission trucks over the next few decades. The proposed project's GHG emissions would benefit (i.e., be reduced) over the long-term as older, less fuel-efficient, and higher polluting engines are decommissioned and replaced by newer, cleaner engines and ZEV trucks.

Southern California Association of Governments RTP/SCS

The Connect SoCal is growth strategy and transportation plan whose primary intent is to demonstrate how the SCAG region will meet its GHG reduction target through the year 2045. Many of the measures included in the RTP/SCS are focused on: the expansion of, and access to, mass transit (e.g., light rail, commuter rail, bus rapid transit, etc.); planning growth around livable corridors; and locating new

housing and job growth in high quality transit areas. Collectively, these land use plans, in conjunction with measures at the state-level to improve fuel efficiency standards, are designed to meet CARB's goal for the SCAB region for reducing per capita GHG emissions in the region by eight percent by 2020—compared with 2005 levels—and by 19 percent by 2035.

The proposed project would not be located in a TPA nor would it be located in a HQTa; however, the project would generate fewer than 110 net daily trips, and so would not cause a substantial increase in total citywide or regional VMT according to the SBCTA guidelines (See Section 4.17 below). The project meets VMT screening criteria. In addition, the project is an industrial facility, which would not conflict with housing land use strategies contained in the RTP/SCS. For these reasons, the project would not conflict with or otherwise obstruct implementation of Connect SoCal.

San Bernardino County Regional Greenhouse Gas Reduction Plan

The project's GHG emissions would not conflict with the Regional Greenhouse Gas Reduction Plan (Reduction Plan). The project would be consistent with the General Plan policies that form the basis Highland's emission reduction measures in the Reduction Plan. In addition, the project contains design features, that support the goals of the Reduction Plan. Therefore, the project would be consistent with the Reduction Plan.

4.8 – Hazards and Hazardous Materials

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A Phase I Environmental Site Assessment, dated March 1st, 2022 was prepared for the project. A Phase II Subsurface Investigation Report was prepared and dated March 31st, 2022. Both were prepared by Partner Engineering and Science, Inc., and are included in Appendix D and Appendix K. A Soil Management Plan was additionally prepared June 28th, 2022, and is attached as Appendix M. The information in this section relates to hazards and hazardous wastes and is based on the information and analysis provided in the Phase I ESA and Phase II Investigation Report.

a) **Less than Significant Impact.** Implementation of the project could create significant hazards as a result of the routine transport, use, or disposal of hazardous materials during the construction of the proposed project and subsequent operation of the project.

The results of the Phase I Environmental Site Assessment found evidence of two recognized environmental conditions (REC) in the form of two single post hydraulic lifts observed in the service building of S&S Inland Star Property (Property-11 in the assessment). Personnel interviewed indicated the southern lift has been leaking for years. No controlled recognized environmental conditions (CREC) were observed. Nine Historical REC, or HRECs, were observed; six at Property-2 (26999 5th Street) and three at Property-13 (27111 East 5th Street). These were former underground storage tanks that were removed in 1997 under the supervision of the San Bernardino County Fire Department (SBCFD). Closure letters were issued by the SBCFD for Property-2 on December 17, 1997, and for Property-13 on June 27, 1997. A fuel dispenser island and canopy were not removed from Property-2, and no soil samples were taken at the time of removal of the Underground Storage Tanks (USTs). The Phase I ESA identified multiple Business Environmental Risks (BERs), which are risks that have an environmental impact on the use of the land, but not related to issues required to be investigated. The identified BERs include: significant oil staining, a potential concrete sump, suspected asbestos-containing materials and lead-based paints in older buildings, at least four residential septic tanks, and a former water well. The BERs listed are recommended to have testing done to confirm their presence, and if encountered, be removed.

A Phase II Subsurface Investigation Report was conducted to ascertain the potential impact of petroleum hydrocarbons (TPH-cc) and fuel-related volatile organic compounds (VOCs) to soil from potential releases from the hydraulic lifts and fuel dispenser island. None of the soil samples tested from the site indicated a release of TPH-cc and fuel-related VOCs exceeding regulatory guidelines, and were concluded to not represent an environmental concern. The report additionally indicated that it is likely UST piping remains on-site near the dispenser island and canopy, and if encountered in the future, removal and soil sampling is recommended.

Short-term Activities (Construction): Project construction activities would involve the temporary use and transport of fuels, equipment, earth and building materials, among other potentially hazardous materials. The contractor would be required to develop and adhere to a Health and Safety Plan, which pursuant to California state Health and Safety Code Chapter 6.95, Division 20 (§§ 25500-25532), would minimize potentially hazardous effects of handling potentially hazardous materials during construction. Construction operations would require the removal, clean up, and proper disposal of RECs and BERs identified at the project site. Per the Subsurface Investigation Report, on-site soils tested were determined to be within regulatory guidelines for TPH-cc and fuel-related VOCs. Impacts to the surrounding area through the disposal of on-site hazardous materials and waste would be less than significant. The Project will be in the jurisdiction, and in compliance, of the Environmental Protection Agency (EPA) and County of San Bernardino, which manage the inspection, regulation, transportation, use, and disposal of hazardous materials in Highland. Impacts will be less than significant impact.

Long-term Activities (Operation): With regard to project operation, the site is zoned as Business Park, which are designated for light industrial, research and development, and office uses. The proposed

project is an industrial facility, meant for the storage and movement of materials. The specific materials moved through the proposed industrial facility site are unknown prior to its construction. In compliance with the San Bernardino County Hazardous Waste Management Plan (HWMP), the City of Highland requires businesses that use or generate hazardous materials to keep an inventory of the amounts and types on-site. The transport, use, and/or disposal of hazardous materials is not associated with or expected with this project. The project will generate limited amounts Household Hazard Waste (HHW), wastes prohibited or discouraged from being disposed of at local landfills. The San Bernardino County Fire Protection District operates a Household Hazardous Waste Program, with 14 permanent HHW collection facilities. These facilities will allow easy disposal of any HHW generated on-site. Further, the project will be in compliance of Chapter 16.40.130 "Hazardous Materials Management" of the Highland Municipal Code, which regulates the use and disposal of hazardous materials by businesses in Highland. Following local regulations the use of common household hazardous materials, created waste, and their disposal do not present a substantial health risk to the community. Impacts associated with the routine transport, use, or disposal of hazardous materials or wastes would be less than significant.

b) **Less than Significant Impact.** According to the State Water Resources Control Board there are no open cases of leaking underground storage tanks (LUST) on site (see section d). Former USTs on site were removed in 1997. As previously discussed, the Phase I ESA identified two hydraulic lifts on-site as recognized environmental conditions (RECs), which refer to the presence of hazardous substances in, on, or at the project site due to a release or potential release into the environment. The southern hydraulic lift was reported to have a leak for many years, and a fuel dispenser island was left over from one of the removed USTs. A subsequent Phase II Subsurface Investigation Report tested soil samples to evaluate the potential impacts of petroleum hydrocarbons and fuel-related VOCs from a release from these conditions. None of the samples tested contained concentrations of TPH-cc and VOCs exceeding regulatory guidelines. It was concluded there was no release of environmental concern in the area. A Soil Management Plan was prepared in addition to the Phase II ESA, as a measure to protect workers incase subsurface areas of concern are identified during redevelopment (see Appendix M). Impacts would be less than significant as long in regards to the subsurface release of hazardous materials into the environment.

Development on the project site began in the 1930s with several residential structures, and in 1975 a commercial structure was built. Between 1985 and 89 more commercial buildings were built and expanded. Due to the age of many buildings on the project site, the Phase I ESA determined that there is the potential that older structures may contain asbestos-containing materials (ACMs) and/or lead-based paints (LBPs). These are considered Business Environmental Risks (BERs) and sampling of possible ACMs and LBPs will need to be done prior to any construction activities to confirm their presence and prevent possible exposure. SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities) requires work practices that limit asbestos emissions from building demolition and renovation activities, including the removal and disturbance of ACM.²⁰ This rule is designed to protect uses and persons adjacent to demolition or renovation activity from exposure to asbestos emissions. The applicant must also notify SCAQMD of their intent to perform demolition or renovation of any buildings that may contain asbestos prior to demolition and requires that all ACM is removed prior to any demolition. Rule 1403 establishes notification procedures, removal procedures, handling and clean-up procedures, storage, disposal, landfilling requirements, warning label requirements, and some methods of dry removal that must be implemented. Exposure of surrounding land uses to lead from demolition activities is generally not a concern because demolition activities do not result in appreciable emissions of lead. Testing, monitoring, containment, and disposal of lead-based materials will comply with all Cal/OSHA standards and regulations under California Construction Safety Orders for Lead section 1532. Other BERs identified on the project site include oil spillage in former auto-maintenance areas, four septic tanks systems, and a potential concrete sump. Oil-stained

soils should be disposed of if encountered, the sump and septic tanks removed and abandoned with regard to local requirements. Impacts to the public through the accidental release of hazardous materials would be less than significant with diligent sampling and removal methods taken.

c) **Less than Significant Impact.** Highland Head start is a child daycare center located at the southwest corner of 5th Street and Central Avenue, approximately 100 feet west of the project site. Highland Head start is a daycare facility with an outdoor playground area enclosed in fencing on the property, and services children ages 0 to 6. Students of Highland Head start are considered among the sensitive receptor groups analyzed in the Air Quality and Health Risk Assessment Report, which determined that the proposed project would have a less than significant impact on sensitive receptors; see section 4.3c.

d) **No Impact.** The proposed project is not located on a site listed on the state *Cortese List*, a compilation of various sites throughout the state that have been compromised due to soil or groundwater contamination from past uses.²¹

Based upon review of the *Cortese List*, the project site is not:

- listed as a hazardous waste and substance site by the Department of Toxic Substances Control (DTSC),²²
- listed as a leaking underground storage tank (LUST) site by the State Water Resources Control Board (SWRCB),²³
- listed as a hazardous solid waste disposal site by the SWRCB,²⁴
- currently subject to a Cease and Desist Order (CDO) or a Cleanup and Abatement Order (CAO) as issued by the SWRCB,²⁵ or
- developed with a hazardous waste facility subject to corrective action by the DTSC.²⁶

e) **Less than Significant Impact.** The project site is located less than a mile from the northeastern corner of a runway from the San Bernardino International Airport (SBIA). The airport is located on the former Norton Airforce Base, outside of the City of Highland in San Bernardino, and is used mostly for cargo shipment; passenger flights are scheduled to begin operating out of the airport in August 2022. The next closest airport is Redlands Municipal Airport located approximately 6.3 miles southeast of the project site. Highland has no direct authority over nearby airports, and as such, plans and regulations created by local, state, and federal airport authorities inform land use planning in Highland. San Bernardino County has delegated each airport proprietor to create individual Airport Land Use Compatibility Plans, rather than establish an Airport Land Use Commission. The San Bernardino International Airport Authority (SBIAA) is a State-created authority that serves as the owner, developer, and operator of that airport's aviation functions.

The Project site is zoned as Business Park (BP) allowing for light industrial uses, wholesaling, and/or warehousing in an enclosed building. The 5th Street Corridor is zoned for BP uses specifically because of its proximity to the SBIA, and its potential to create business and employment opportunities. The project site will be developed and operated in cooperation with the SBIAA, and will not encroach on airport property. The project site is outside of the SBIAA noise contour maps and will not expose persons residing or working in the project area to excessive airport noise hazards. The project site is located in the SBIA influence area, however, according to the Highland Zoning Map, it is within Zone E of the influence area, representing a negligible risk level. The SBIA is not an approving agency for the proposed project. The proposed project will adhere to Highland's Municipal Code, Chapter 8.50 Noise Control and Title 16 Land Use and Development. The project site lies within the 65dB Community Noise Equivalent Level noise contour and will not exceed the CNEL range from 65 to 70 dB, the level of noise acceptable for people in the vicinity of an airport as set by California's Airport Noise Regulations. The

proposed project will adhere to noise and safety policies set in the Highland's General Plan Airport, Public Health and Safety, and Noise Elements. The industrial facility building is proposed to be above City requirements, so a major variance for construction was applied for and approved by the City of Highland. Additionally, a Notice of No Hazard was granted for the proposed project by the Federal Aviation Authority (FAA, See Appendix H). Impacts will be less than significant.

f) **Less than Significant Impact.** Per California Fire and Building Codes, sufficient space will have to be provided around the buildings for emergency personnel and equipment access and emergency evacuation. The project includes 10 ft. landscaping setbacks and 20 ft. building setbacks around the parking stalls and proposed building so as not to interfere with emergency access to and evacuation from the facility. Construction operations conducted at the project site will not significantly impede the flow of traffic on major evacuation routes in and around the City of Highland, which include Highways 10, 210, and 215. The project would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan because no permanent public street or lane closures are proposed. Construction work in the street associated with the project would be limited to a nominal potential traffic diversion. Project impacts would be less than significant.

g) **Less than Significant Impact.** The project site is not located within or near any State Responsibility Areas²⁷ or other wildland areas. The nearest such area is located east outside of the City of Highland. Any potential impacts related to wildland fire would be less-than-significant.

4.9 – Hydrology and Water Quality

Would the project:

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

A Preliminary Water Quality Management Plan (WQMP), dated July 14th, 2022, was prepared and approved for the project, and is included as Appendix N. The information in this section relates to hydrology and water quality and is based on information and analysis provided in the WQMP

a) **Less than Significant Impact.** The project site is zoned as Business Park (BP), meant for light industrial development, warehousing, wholesaling, and other commercial or manufacturing purposes. By their nature, these kinds of facilities require a significant amount of parking, truck-staging, and vehicle circulation, in addition to the building facilities themselves. This in turn increases the amount of impermeable surfaces and the amount of flows into storm drains. Landscape coverage around the project site serves to provide relief for this.

The project site is partially developed and currently used for light manufacturing and equipment storage. The project includes the construction of a industrial facility building and associated parking and landscape improvements. A Water Quality Management Plan (WQMP) was created in order to comply with the requirements of the City of Highland and the NPDES Areawide Stormwater Program. Five distinct drainage areas were identified on the project site. Two drainage areas on the west and easterly sides of the building along 3rd Street direct surfaces flows to inlets, where runoff is collected in an underground stormwater drainage pipeline, and moved to underground infiltration systems (STC #1 and STC #2). Storms where runoff exceeds the capacity of these infiltration systems will be directed to a new connection to the 3rd Street storm drain line. In addition, hydrodynamic separators are proposed as pre-treatment Best Management Practices (BMPs), located upstream of the underground infiltration systems. There are an additional three drainage areas on 5th Street, Central Avenue, and 3rd Street; all of which are considered self-treating with respect to storm water quality treatment, and all of which outlet excess runoff through under sidewalk drains or culverts onto the gutters of their respective street.

The plan also requires non-structural and structural source control Best Management Practices (BMPs) to be incorporated to reduce pollution from the project. Non-structural BMPs to be incorporated into the Project include, but are not limited to: education of property owners, tenants, and occupants on contents of WQMP; activity restrictions; irrigation and pesticide management BMPs; BMP maintenance; a site-specific Spill Contingency Plan; compliance with Local Water Quality Ordinances; a litter/debris control program; drainage facilities inspected, cleaned, and maintained annually; and loading docks, driveways, and parking lots regularly cleaned and swept. Structural BMPs to be incorporated into the Project include: storm drain system stenciling and signage; construction of outdoor trash and waste storage areas; efficient landscape design and irrigation systems; landscaped areas at a minimum of 1 inches below the curb, sidewalk, or pavement; and dock areas maintained and swept. All BMPs included as part of the project WQMP are required to be maintained through regular scheduled inspection and maintenance.

The project is also subject to preventative low-impact development (LID) site design requirements. Design features intended to comply with these requirements will include disconnecting impervious areas, preserving existing drainage patterns, maximizing the natural infiltration capacity, and prohibiting heavy construction vehicles from unnecessary soil compaction.

The project will be required to adhere to all Santa Ana Regional Water Quality Control Board (SARWQCB) permitting requirements for construction and NPDES standards for stormwater runoff. With adherence to SARWQCB permitting requirements and NPDES standards, implementation of non-structural and structural BMPs, and adherence to LID design requirements, impacts to water quality standards or waste discharge requirements will be less than significant.

b) **Less than Significant Impact.** Free water beneath the project site was not found, and any subsurface waters underneath the project site were determined to be at a depth in excess of 35± ft. The

nearest monitoring well is located approximately 2,000 ft. southeast of the project site. Readings indicate a high of 52 ± ft. below the grounds surface in October 1984. The most recent reading available via the Geotracker website was from June 2016, with a depth to groundwater of approximately 220 ft. below ground surface with an inferred flow direction south. The low water tables recorded indicate the Project will have a less than significant impact on groundwater supplies.

There is a nearby former landfill site in the northeast corner of the San Bernardino International Airport, currently overseen by the Department of Toxic Substances Control and the Santa Ana River Water Quality Control Board. No disturbance of groundwater is anticipated from the former landfill site or from grading. The proposed building footprint and pavement area would increase impervious surface coverage on the site, thereby reducing the total amount of infiltration onsite. However, the proposed project will have two infiltration systems installed on site, southeast and southwest of the building. The bottoms of these sites will be approximately 10 to 12 ± ft. below the existing site grades, and are determined to be located at least 25 feet away from the building and any retaining walls. The project site is not utilized for groundwater recharge and will include landscaping that will contribute to infiltration. The updated infiltration and landscaping will be beneficial. The development of the project site will have a less than significant impact on the groundwater table level.

c.i) Less than Significant Impact. According to the City of Highland General Plan, Conservation and Open Space Element, the City lies at the base of several regional watersheds, notably the Santa Ana River watershed, with the river located approximately 1.5 miles south of the project site. The river and its tributaries do not intersect the project site. Further, the project will not result in the significant alteration of drainages and drainage patterns, as existing drainage facilities on-site will be regularly maintained as stated previously. Proper maintenance of drainage facilities will decrease the likelihood of erosion of sensitive stream habitats, and as such any impacts to streams or rivers near the project site will be less than significant.

c.ii) Less than Significant Impact. No streams traverse the project site; thus, the project would not result in the alteration of any stream course. During construction, the Project applicant would be required to comply with drainage and runoff guidelines pursuant to Highland Municipal Code Chapter 16.64.070. With regard to project operation, construction of the project would increase the net area of impermeable surfaces on the site; therefore, increased discharges to the City's existing storm drain system may occur. Surface runoff associated with the proposed development would be collected on site through multiple drainage areas and infiltration systems, and conveyed to the City's storm drainage system. All drainage plans are subject to City review and approval. The project site is zoned for light industrial uses and as a result could increase pollutants entering drainage systems. Pre-treatment BMPs are proposed for two drainage facilities on-site, as well as general non-structural and structural BMPs throughout the project site, which will assist in protecting downstream water quality. Compliance with local drainage guidelines and implementation of pollutant-related BMPs would make potential impacts less than significant.

c.iii) Less than Significant Impact. Development of the proposed project would increase the net area of impermeable surfaces on the site. Runoff will be collected through multiple drainage areas would be collected on site and conveyed to two on-site infiltration systems basin and then conveyed to the City's storm drainage system. All drainage plans are subject to City review and approval. The proposed project is zoned for light industrial use and could result in substantial pollutant loading. Non-structural and structural BMPs are required to be incorporated to protect downstream water quality. With proper maintenance of drainage facilities and adherence to BMPs, impacts would be less than significant.

c.iv) No Impact. According to flood maps prepared by the Federal Emergency Management Agency (FEMA), the Project site is located in an area designated "Other Flood Area, Zone X"; which is an area

encompassing the following criteria: 0.2% annual chance flood; area of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and an area protected by levees from 1% annual chance flood. The project site is in an area of minimal flood hazard, and will not impede or redirect flood flows. No impacts will occur.

d) **No Impact.** The City is not exposed to tsunami hazards due to its inland location. In addition, according to the Public Health and Safety Element of Highland's General Plan, most of the City is within the dam inundation area of the Seven Oaks Dam. However, the project site is not located in the dam inundation area, and is located in a 500-year floodplain. As previously stated, according to FEMA, the project site is in an area of minimal flood hazard. No impacts will occur.

e) **Less than Significant Impact.** The Santa Ana Regional Water Quality Control Board's (SARWQCB) Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Development of the proposed project will be required to adhere to requirements of the Basin Plan. This includes the incorporation of best management practices (BMPs) to protect water quality during construction and operational periods. Per the preliminary WQMP, the proposed project is required to implement non-structural and structural BMPs to reduce runoff and pollutants entering waterways. Development of the project site would be subject to all existing water quality regulations and programs, including all applicable construction permits. Existing General Plan policies related to groundwater quality are applicable to the project. The Conservation and Open Space Element includes policies that would limit potential water quality impacts to surface water and groundwater resources. Implementation of General Plan policies, adherence to the Storm Water Quality Management Plan, and the Regional Basin Plan, would ensure that water quality impacts related to the proposed project would be less than significant.

4.10 – Land Use and Planning

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) **No Impact.** The project site is comprised of 11 rectangular parcels with 4 small existing structures used for various light-industrial or manufacturing uses including, but not limited to, equipment storage and truck parking facilities. The project site is surrounded by commercial, industrial, and transportation-related land uses, and will not include the reconfiguration of existing roadways or streets. There are residential uses near the project site, however the project will not divide an established community and, as such, no impacts will occur.

b) **No Impact.** The project would not conflict with existing land uses, as designated in the General Plan Land Use Plan.²⁸ The proposed project is located within the City of Highland with the Zoning designation of Business Park (BP). The site is not located in a specific plan area and does not conflict with any other land use plan, policy or regulation of any agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. No impact will occur.

4.11 – Mineral Resources

Would the project:

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

a) **Less Than Significant Impact.** The California Surface Mining and Reclamation Act identifies and protects mineral resources within the State of California. It establishes several Mineral Resource Zones, divisions of land containing within them various amounts of known or unknown mineral resources. According to the City's General Plan, there are 6,052 acres in Highland classified as MRZ-2, an indication that significant mineral deposits are likely to be present.²⁹ Of this, 2,345 acres of this remain undeveloped. Minerals in Highland consist mostly of iron, decorative rocks, clay, limestone, sand and gravel. Mineral resources in Highland have been classified as significant by the State Geologist and San Bernardino County. Per the City's General Plan, extraction of minerals is limited to areas where they naturally occur, and those same areas can support new developments. Mining operations are incompatible with the surrounding land uses and would lead to a variety of environmental and aesthetic impacts that would diminish the quality of the surrounding community. The project site is located in an urbanized area of Highland, with developments on and surrounding the property that include business and residential purposes. The surrounding land uses of the project site would be negatively affected by any mining operations. The Conservation and Open Space Element of the City's General Plan outlines policies to identify and properly manage mineral resources in Highland's open space areas. The proposed project is in an urbanized, a developed area of the City incompatible with mining extraction operations, and will have a less than significant impact on mineral resources available to the City.

b) **Less than Significant Impact.** Mineral resources found in Highland have been deemed significant to the San Bernardino region. The project site is located in an area designated as a Mineral Resource Zone, MRZ-2, which are areas of which significant mineral deposits are likely to be present. However, the area is zoned as a Business Park (BP), meant for light industrial uses related to warehousing, wholesaling, and some manufacturing uses. The area is highly urbanized, and is surrounded by areas that would not support the development of mining operations and the subsequent increase in mining related pollution. The development of the project does not constitute a loss of mineral resources as the surrounding land uses do not support the development of mining operations. Any loss of mineral resources would be less than significant.

4.12 – Noise

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A *Noise Impact Analysis Report* was prepared by MIG, Inc. dated September 12, 2022 to evaluate and document noise levels associated with construction and operation of the proposed industrial facility (See Appendix E. The information in this section is taken from the *Noise Impact Analysis Report* for the proposed project. Additional detail regarding how noise is defined and measured can be found in the report in Appendix E.

a) Less than Significant

Construction Noise Impact Analysis

The proposed project would generate construction noise from heavy equipment operations and vehicle trips to and from the project area. Some heavy equipment would consist of mobile equipment such as a loader, excavator, etc. that would move around work areas; other equipment would consist of stationary equipment (e.g., air compressors) that would generally operate in a fixed location until work activities are complete. Heavy equipment generates noise from engine operation, mechanical systems and components (e.g., fans, gears, propulsion of wheels or tracks), and other sources such as back-up alarms. Mobile equipment generally operates at different loads, or power outputs, and produce higher or lower noise levels depending on the operating load. Stationary equipment generally operates at a steady power output that produces a constant noise level. Vehicle trips, including worker, vendor, and haul truck trips would generate noise, and would occur on the roads that provide access to the Project site, primarily West 5th Street.

Since project-specific construction equipment information is not available at the time of writing this, potential construction-related noise impacts can only be evaluated based on the typical construction activities associated with a typical industrial warehousing development project. The report estimates heavy-duty construction equipment noise levels using the FHWA's Roadway Construction Noise Model (RCNM), Version 2.0. The equipment assumptions used in the report are based on, and consistent with, the CalEEMod construction phasing, equipment usage, and operating schedules used to evaluate the proposed project's potential construction air quality impacts.

The RCNM was used to model noise levels at nine (9) different receptor locations that could be impacted by the project's construction noise levels. The location of the modeled construction noise receptors is shown in Exhibit 7 and summarized in Table 10.

Table 10: Modeled Construction Noise Receptors		
RCNM Receptor ID	Receptor Type	Location
R1	Library/Park	7863 Central Avenue
R2	Residential (Non-Conforming)	26998 Meines Street
R3	Residential (Non-Conforming)	27014 West 5 th Street
R4	Commercial (Crematory)	27015 West 5 th Street
R5	Commercial (Tavern)	26998 East 3 rd Street
R6	Residential	26875 4 th Place
R7	Commercial (Upholstery Shop)	8046 Central Avenue
R8	Highland Head Start (Preschool)	26887 West 5 th Street
R9	Residential	26885 Mossway Street

The RCNM input distance between the closest edge of the work area to the modeled construction noise receptors is shown in Table 11.

Table 11: Distance Between Construction Work Areas and Modeled Noise Receptors									
Construction Activity	Modeled Receptor / Distance to Construction Activity^{(A),(B)}								
	R1	R2	R3	R4	R5	R6	R7	R8	R9
Demolition (Worst Case)	690	275	160	25	120	140	85	65	235
Site Preparation (Worst Case)	690	275	160	25	120	140	85	65	235
Site Preparation (Typical)	1,000	600	485	240	180	195	170	215	575
Grading (Worst Case)	690	275	160	25	120	140	85	65	235
Grading (Typical)	1,000	600	485	240	180	195	170	215	575
Trenching (Typical)	1,000	600	485	240	180	195	170	215	575
Building Foundations (Typical)	1,000	600	485	240	180	195	170	215	575
Vertical Building Construction (Typical)	1,000	600	485	240	180	195	170	215	575
Building MEP (Typical)	1,000	600	485	240	180	195	170	215	575
Paving (Worst Case)	690	275	160	25	120	140	85	65	235
Architectural Coating (Typical)	1,000	600	485	240	180	195	170	215	575

Source: MIG, 2022 (see Appendix B)
(A) Worst case distances are measured between the Project property line and the receptor property line (R1, R2, R3, R6, R8, and R9) or building façade (R4, R5, R7).
(B) Typical distances are measured between the center of the site (site preparation and grading) or the east and west parts of the site (trenching, building foundations, building construction, building MEP, and architectural coating) and the receptor property line or building façade.

Table 12 summarizes modeled construction equipment noise levels at residential and non-residential receptors in the vicinity of the project site for each anticipated project construction activity.

Table 12: Construction Noise Levels at Modeled Noise Receptors										
Construction Activity	Days	Estimated Noise Level (dBA L _{eq}) ^{(A),(B)}								
		R1	R2	R3	R4	R5	R6	R7	R8	R9
Demolition (Worst Case)	3	61.8	69.8	74.5	90.6	77	75.6	80	82.3	71.1
Site Preparation (Worst Case)	3	59.2	67.2	71.9	88	74.4	73.1	77.4	79.7	68.6
Site Preparation (Typical)	10	61.6	64.9	65.5	69.0	69.6	70.4	71.5	71.1	65.3
Grading (Worst Case)	3	62.4	70.4	75.1	91.2	77.6	76.3	80.6	82.9	71.8
Grading (Typical)	20	61.3	68.0	71.7	87.7	74.5	73.8	77.3	79.2	69.2
Trenching (Typical)	60	55.1	59.5	61.4	67.5	70.0	69.3	70.5	68.4	59.9
Building Foundations (Typical)	20	60.1	64.5	66.3	72.5	75.0	74.3	75.4	73.4	64.9
Vertical Building Construction (Typical)	60	52.8	66.2	68.2	67.0	67.7	65.2	59.1	57.3	52.8
Building MEP (Typical)	60	41.7	46.1	48.0	54.1	56.6	55.9	57.1	55.0	46.5
Paving (Worst Case)	3	53.9	61.9	66.6	82.7	69.1	67.7	72.1	74.4	63.2
Architectural Coating (Typical)	25	50.7	55.1	57.0	63.1	65.6	64.9	66.1	64	55.5
Source: MIG, 2022 (see Appendix B)										
(A) Worst case distances are measured between the Project property line and the receptor property line (R1, R2, R3, R6, R8, and R9) or building façade (R4, R5, R7).										
(B) Typical distances are measured between the center of the site (site preparation and grading) or the east and west parts of the site (trenching, building foundations, building construction, building MEP, and architectural coating) and the receptor property line or building façade.										

As shown in Table 12, the project's construction noise levels could reach up to 80.6 dBA Leq at residential receptors, 82.9 dBA Leq at the Highland Head Start preschool, and 91.2 dBA Leq at adjacent commercial receptor locations.

Residential Receptors (R2, R3, R6, R9): The modeled worst-case construction noise level at any residential receptor location would be 76.3 dBA Leq. This would occur at the residence located west of the project site, across Central Avenue (R6), during the project's grading phase. During typical construction periods, construction noise levels would not exceed 71 dBA at residences on Meines Road (R2), 72 dBA at residences on West 5th Street (R3), 75 dBA at residences on Central Avenue (R6), and 70 dBA at residences on Mossway Street (R9). The estimated temporary increase in daytime noise levels at residential receptor locations could temporarily, under worst-case conditions, be approximately 2.3 dBA Leq to 10.0 dBA Leq (see Appendix E, with the highest increases occurring at R6 and the

lowest increases occurring at R9. Under typical conditions, the temporary increase in daytime noise levels could range from 1.4 dBA Leq to 8.0 dBA Leq.

Highland Head Start Preschool (R8): The modeled worst-case construction noise level at the Highland Head Start Preschool would be 82.3 dBA Leq during the project's demolition phase. During typical construction periods, construction noise levels would not exceed 80 dBA Leq. The estimated temporary increase in daytime noise levels at the preschool could temporarily, under worst-case conditions, be approximately 8.0 dBA Leq to 16.3 dBA Leq (see Appendix E. Under typical conditions, the temporary increase in daytime noise levels could range from 2.1 dBA Leq to 7.1 dBA Leq.

Library Park Receptors (R1): The modeled worst-case construction noise level at the Sam Racardio Library and Highland Community Park (R1) would be 62.4 dBA Leq during the project's grading phase. During typical construction periods, construction noise levels would not exceed 62 dBA Leq. Temporary construction noise levels would be similar or less than ambient noise levels at this location.

Commercial Receptors (R4, R5, R7): The modeled worst-case construction noise level at any commercial receptor would be 91.2 dBA Leq. This would occur at the crematory adjacent to the project site (R4) during the project's grading phase. During typical construction periods, construction noise levels would not exceed 88 dBA at the adjacent crematory (R4), 75 dBA at the adjacent tavern (R5), and 81 dBA at the commercial upholster across Central Avenue (R7). The estimated temporary increase in daytime noise levels at commercial receptor locations could temporarily, under worst-case conditions, be approximately 2.5 dBA Leq to 24.6 dBA Leq (see Table 4 2), with the highest increases occurring at the crematory (R4) and the lowest increases occurring at the tavern (R5). Under typical conditions, the temporary increase in daytime noise levels could range from 1.0 dBA Leq to 21.0 dBA Leq. Commercial receptors are not considered sensitive receptors because they lack sensitive outdoor use areas where occupants could be exposed to construction noise levels.

The noise level estimates summarized above are based on peak equipment usage during each construction phase. As construction progresses within each phase, less equipment is usually required to perform activities and, therefore, less equipment noise is generated.

The City's Municipal Code does not establish numeric standards for construction noise levels (e.g., 90 dBA Leq). Construction activities are exempt from the City's noise standards (Section 8.50.060.L) but are limited to the hours of 7 AM to 6 PM Monday thru Saturday by the City's General Plan (Goal 7.3, Action 1), with no construction activities performed during city or federal observed holidays (Section 15.48.020.A). Potential construction noise level increases at the sensitive residential and preschool land uses, when compared to the existing ambient noise environment, could be up to approximately 10 to 16.3 dBA higher than existing conditions, depending on the construction activities undertaken. This temporary increase in daytime exterior noise levels would represent an approximate doubling to tripling of perceived loudness at sensitive receptor locations for a short duration (i.e., demolition, site preparation, grading, and paving activities would last approximately 4 months out of the project's 12-month long construction schedule). The proposed project would comply with the City Municipal Code's permissible construction activity time period requirements and would not result in prolonged temporary construction noise levels that exceed an applicable standard. This impact would be less than significant.

To further reduce the project's less than significant construction noise levels, and to reduce the potential for construction activities to interfere or annoy adjacent receptors or otherwise result in a nuisance, MIG recommends the project incorporate the following Best Management Practices (BMPs) to control potential construction noise levels.

Construction Noise Control Best Management Practices.

To reduce the potential for construction activities to annoy or result in a temporary noise nuisance to adjacent residential receptors, the Applicant and/or its designated contractor, contractor's representatives, or other appropriate personnel shall:

- Notify Adjacent Land Use of Construction Activities. This notice shall be provided at least one week prior to the start of any construction activities, describe the construction noise control best management practices to be implemented by the Project, and include the name and phone number of a designated contact for the Applicant and the City of Highland responsible for handling construction-related noise complaints. This notice shall be provided to the owner/occupants of all occupied properties within 250 feet of the Project site.
- Restrict work hours/equipment noise. All work shall be subject to the requirements in City Code Section 15.48.020.A and General Plan Goal 7.3, Action 1. Construction activities, including deliveries, shall only occur during the hours of 7:00 AM to 6:00 PM, Monday through Saturday. Construction activities shall be prohibited on Sundays and City- and Federal-observed holidays. The Applicant and/or its contractor shall post a sign at all entrances to the construction site informing contractors, subcontractors, construction workers, etc. of this requirement.
- Construction equipment selection, use, and noise control measures. The following measures shall apply during construction activities:
 - Contractors shall use the smallest size equipment capable of safely completing work activities.
 - Construction staging shall occur as far away from the adjacent residential and preschool properties on West 5th Street and Central Avenue as possible.
 - All stationary noise-generating equipment such as pumps, compressors, and welding machines shall be located as far from the adjacent residential and preschool properties on West 5th Street and Central Avenue as possible.
 - Heavy equipment engines shall be covered, and exhaust pipes shall include a muffler in good working condition.
 - Pneumatic tools shall include a noise suppression device on the compressed air exhaust.
 - The Applicant and/or his contractor shall connect to existing electrical service at the site to avoid the use of stationary power generators. This measure shall be subject to the approval of the local electric utility.
 - No radios or other amplified sound devices shall be audible beyond the property line of the construction site.

Operational Noise Impact Analysis

Once constructed, the proposed project would generate noise from off-site vehicle travel on West 5th Street and East 3rd Street. The proposed project would generate 164 total daily passenger car trips and 90 total daily truck trips (equal to 254 total vehicle trips and 392 total passenger car equivalent (PCE) trips (Urban Crossroads, 2022). For passenger vehicles and trucks, access to the site was assumed to occur from West 5th Street (80%) and East 3rd Street (20%) entrance ways.

On-site passenger car travel along the site driveways and perimeter road/fire lane, automobile parking, and other miscellaneous automobile noise sources such as doors closing, and engine start-up and revving would generate noise as well. For passenger vehicles, site access was assumed to occur as follows: 36.6% via the East 3rd Street entrance and 63.4% via the Central Avenue entrance. On-site automobile travel is assumed to occur at low speeds (15 mph).

Further noise would be generated through; on-site truck travel along the site drive aisle to loading dock areas, truck maneuvering into and out of loading docks, and other miscellaneous sources such as engine start-up and revving, cab door closing, and release of compressed air from truck brake systems. For trucks, site access was assumed to occur as follows: 80% via the West 5th Street entrance and 20% via the East 3rd Street entrance. Similar to automobiles, on-site truck travel is assumed to occur at low speeds (no more than 15 mph). According to the trip generation assessment prepared for the project, truck trips are assumed to consist of 2-axle trips (6.3% of all truck trips), 3-axle trips 7.1% of all trips) large, heavy-duty 4-axle or more truck trips (22.0% of all truck trips). On-site idling was assumed to occur for up to 15 minutes per loading/unloading operation.

Rooftop mounted HVAC units, assumed to be rated at 5 tons and generally located in the center of the office portions of the proposed building would generate noise. Each unit would be fully concealed behind a parapet or enclosure that would reduce potential HVAC unit noise levels.

Miscellaneous noise sources include: landscaping equipment, garbage collection services, and other miscellaneous site operations (e.g., occasional electric power jack, pallet lift, or forklift). These noise sources would be intermittent and would not substantially change overall project noise levels, and as such, those sources are not discussed further.

Operational Noise Level Estimates

The proposed project's operational noise levels were estimated using standard theoretical equations for predicting environmental noise levels. Reference and potential hourly average noise levels associated with the proposed project's noise sources are summarized in Table 13. All reference noise levels are presented at a distance of three (3) feet from the source.

Table 13: Project Noise Source – Reference and Hourly L_{eq} Noise Levels			
Noise Source	Reference dBA^(A)	Duration^(B)	Hourly L_{eq}^(C)
Automobile Trips			
<i>Low speed travel (15 mph)/parking</i>	55	30 seconds	34.2
<i>Door closing</i>	90	1 second	54.4
<i>Engine start and revving</i>	90	10 seconds	64.4
<i>Total Combined Noise Level</i>			64.9
On-Site Truck Trip			
<i>Low speed travel (15 mph)</i>	96	30 seconds	75.2
<i>Maneuvering (w/ back-up alarm)</i>	100	150 seconds	86.2
<i>Air brake release</i>	98	3 seconds	67.2
<i>Main engine idling</i>	86	900 seconds	80
<i>Door closing</i>	90	2 second	57.4
<i>Engine start and revving</i>	100	10 seconds	74.4
<i>Total Combined Noise Level</i>			87.9
Truck Entrance Way			
<i>Industrial facility Noise Measurement</i>	71.4	3,600 seconds	71.4
HVAC Unit			
<i>Operation (5-ton, with parapet wall)</i>	80	2,400 seconds	68.2
Source: MIG (See Appendix C, Sheet 1)			
(A) Reference dBA is based on a distance of 3 feet.			
(B) Duration is used to estimate the percentage of time the noise is generated per Equation 3 (out of 3,600 seconds in an hour).			
(C) Hourly L_{eq} estimated using Equation 3.			

The proposed project's potential noise levels were estimated using the reference and calculated hourly L_{eq} noise levels identified in Table 13 above, adjusted for distance (between the noise source and property line) and activity levels (e.g., number of automobile trips, trucks idling, etc.). In general, the estimated noise levels are theoretical predictions; they do not account for potential reflection or partial shielding, atmospheric or ground absorption, or other excess attenuation factors. For multiple noise sources such as cars parking, trucks idling, HVAC units, etc., noise levels were modeled from a single location to conservatively aggregate noise levels from an area (i.e., overestimate noise levels coming from any single point). For the purposes of this analysis, the project's noise sources (HVAC units, parking areas, drive aisles, and truck dock bays) were treated as stationary noise sources. Although the noise generated from parking areas, drive aisles, and truck dock bays is primarily generated by cars and trucks (mobile sources) and not stationary sources, this analysis conservatively compares noise from these sources against the City's exterior stationary source noise standards because noise from these areas would generally come from a fixed location (e.g., an idling truck, a parked car, etc.). In addition, it is assumed that all on-site travel would occur at slow speed (15 mph or less), and due to the short distance traveled on-site (as little as 150 feet to some dock locations), on-site truck travel would be similar to a stationary source (as compared to trucks travelling on West 5th Street or East 3rd Street). Project noise levels were estimated at eight (8) property line receiver locations surrounding the site, as shown in Exhibit 8. Only project noise sources within 700 feet of a noise receiver that had a direct line

of sight to the receiver were included in the noise prediction estimates. The distance between property line receiver locations and the project's noise sources is shown in Table 14.

Table 14: Summary of Distance Between Project Noise Source and Property Line Receivers

Project Noise Source	Distance in Feet Between Noise Source and Property Line Receiver ^(A)							
	R1 Residential	R2 Residential	R3 Commercial	R4 Commercial	R5 Commercial	R6 Residential	R7 Preschool	R8 Residential
Truck Entrance 1	295	255	--(B)	--	--	--	--	640
Truck Entrance 2	--	--	--	--	80	--	--	--
Drive Aisle 1	415	--	140	--	--	--	--	--
Drive Aisle 2	--	--	--	50	--	--	--	--
Drive Aisle 3	--	--	--	--	50	--	--	--
Docks 1-3	--	--	65 ^(C)	245	--	--	--	--
Docks 4 -10	--	--	220	180	--	--	--	--
Docks 11-17	--	--	280	115	--	--	--	--
Docks 18 -21	--	--	350	125	160	--	--	--
Parking Area 1	--	--	--	--	--	300	95	375
Parking Area 2	--	--	--	--	--	125	240	560
Parking Area 3	--	--	--	--	--	120	415	--
Parking Area 4	--	--	--	--	20	--	--	--
HVAC 1	555	600	500	500	620	385	175	370
HVAC 2	--	--	635	430	400	220	495	--

(A) The Project includes several distinct parking areas, truck dock bays, and HVAC equipment locations (see Appendix C). The listed distance reflects the closest distance between the listed noise source and the property line receiver.

(B) "--" indicates noise source does not contribute to noise levels at the property line receiver because it is more than 700 feet away from the receptor or the receiver is shielded from the noise source by the proposed industrial facility building.

(C) This distance is based on the distance to the trailer storage area adjacent to this receiver.

The following discusses the key assumptions made to estimate potential Project noise levels at noise receiver locations:

- **Truck entrances:** Truck entrances would be located on West 5th Street and East 3rd Street. Truck entrances include truck turns into and out of the facility and are assumed to produce an average hourly noise level of approximately 71.4 dBA at a distance of 3 feet (see Table 13).
- **On-site passenger car parking:** Parking areas were assumed to require vehicle travel/maneuvering, doors closing, and engine start/revving activities that would produce an average hourly noise level of approximately 62.2 dBA at a distance of 3 feet (see Table 13). Only parking areas with a potential direct line of sight to receiver locations were evaluated. Parking areas were assumed to be fully occupied.
- **On-site truck travel:** Each on-site truck trip was assumed to travel at low speed (no more than 15 mph) and produce an average hourly noise level of 75.2 dBA at a distance of 3 feet (see Table 12). Truck travel lanes would include the West 5th Street and East 3rd Street driveways.

The amount of peak on-site truck travel activity (two (2) total trips in the peak hour periods) was determined from the Project's Trip Generation Assessment.

- On-site truck maneuvering and idling: Loading dock areas were assumed to require truck travel and maneuvering, back-up alarms, air brake release, and other related activities that would produce an average hourly noise level of approximately 87.9 dBA at a distance of 3 feet (see Table 13). Only truck dock areas with a potential direct line of sight to receiver locations were evaluated. Dock areas would be located at least 65 feet from adjacent commercial property lines to the east and would not have a direct line of sight to any other receiver. Each dock area was assumed to be occupied by one truck each hour.
- HVAC units: HVAC units were assumed to operate for 40 minutes of each hour and produce an average hourly noise level of 71.4 dBA at a distance of 3 feet. HVAC units would be located behind a parapet wall that would provide at least 10 dB of attenuation. HVAC units would be located in the center of office space areas.

The project's stationary source, energy-averaged hourly noise levels at modeled receiver locations are summarized in Table 15.

Project Noise Source	Estimated Noise Level at Property Line Receiver							
	R1 Residential	R2 Residential	R3 Commercial	R4 Commercial	R5 Commercial	R6 Residential	R7 Preschool	R8 Residential
Truck Entrance 1	31.5	32.8	--(A)	--	--	--	--	48.1
Truck Entrance 2	--	--	--	--	42.9	--	--	--
Drive Aisle 1	35.4	--	44.8	--	--	--	--	--
Drive Aisle 2	--	--	--	53.8	--	--	--	--
Drive Aisle 3	--	--	--	--	53.8	--	--	--
Docks 1-3	--	--	61.1 ^(B)	49.6	--	--	--	--
Docks 4 -10	--	--	50.6	52.3	--	--	--	--
Docks 11-17	--	--	48.5	56.2	--	--	--	--
Docks 18 -21	--	--	46.5	55.5	53.3	--	--	--
Parking Area 1	--	--	--	--	--	36.0	46.0	34.1
Parking Area 2	--	--	--	--	--	45.0	39.3	32.0
Parking Area 3	--	--	--	--	--	42.8	32.0	--
Parking Area 4	--	--	--	--	58.4	--	--	--
HVAC 1	22.9	22.2	23.8	23.8	21.9	26.1	32.9	26.4
HVAC 2	--	--	21.7	25.1	25.7	30.9	23.9	--
Total Combined Noise Level	37.1	33.2	64.6	61.3	60.7	47.5	47.2	48.4
Exterior Daytime Standard ^(C)	60	60	70	70	70	60	60	60

Table 15: Comparison of Project Noise Levels to County Exterior Stationary Noise Standards

Project Noise Source	Estimated Noise Level at Property Line Receiver							
	R1 Residential	R2 Residential	R3 Commercial	R4 Commercial	R5 Commercial	R6 Residential	R7 Preschool	R8 Residential
Exterior Nighttime Standard ^(C)	55	55	65	65	60	55	55	55
Standard Exceeded?	No	No	No	No	No	No	No	No
Source: MIG (See Appendix C, Sheet 2) (A) “—” indicates noise source does not contribute to noise levels at the property line receiver because it is more than 700 feet away from the receptor or the receiver is shielded from the noise source by the proposed industrial facility building. (B) This noise level is based on the distance to the trailer storage area adjacent to this receiver. (C) See Error! Reference source not found.								

As shown in Table 15, the proposed project’s stationary noise sources would not generate noise levels that exceed the City’s exterior noise standards for residential or industrial land uses. Truck operations would not exceed the City’s stationary noise source at residential receptor locations (to the north and west of the site) because the proposed project’s truck dock bays would be on the east side of the building (adjacent to commercial receptors) and screened from residential receptors to the north by a 10-foot-tall concrete screening wall. This impact would be less than significant.

Compliance with City Interior Noise Standards

As shown in Table 15, the proposed project would not generate noise levels that exceed the City’s exterior noise standards for residential or commercial land uses. The maximum estimated hourly Leq values at residential/preschool receptors (R1, R2, R6, R7, and R8) would be 47.5 dBA Leq. Typical residential-type construction achieves a minimum of 15 to 20 db of exterior-to-interior noise reduction which would be sufficient to ensure the City’s interior 45 CNEL standard (see Table 4 6) is met inside nearby residential and preschool buildings. The maximum estimated hourly Leq values at commercial building receptors (R3, R4) would be 64.6 dBA Leq. Typical commercial-type construction also achieves a minimum of 15 to 20 db of exterior-to-interior noise reduction which would be sufficient to ensure the City’s interior 55 CNEL standard (see Table 4 6) is met inside adjacent commercial buildings. This impact would be less than significant.

Compliance with City of Highland General Plan

The Project’s consistency with the applicable policies of the City’s General Plan Noise Element is summarized in Table 16

Table 16: Project Consistency with Applicable General Plan Noise Policies	
General Plan Noise Element Goal/Policy	Consistency Analysis
Goal 7.1: Protect sensitive land uses and citizens of Highland from annoying and excessive noise through diligent planning and regulation.	
Policy 1: Enforce the City’s Noise Control Ordinance consistent with health and quality of life goals and employ effective techniques of noise abatement through such means as a noise ordinance, building codes and subdivision and zoning regulations.	Consistent. As discussed in Sections 5.4.1.1 and 5.4.1.2 of Appendix E the proposed Project would not generate noise levels that exceed the City’s exterior or interior noise standards.

Table 16: Project Consistency with Applicable General Plan Noise Policies	
General Plan Noise Element Goal/Policy	Consistency Analysis
Policy 2: Encourage the use of site planning and architectural techniques such as alternative building orientation and walls combined with landscaping to mitigate noise to levels consistent with interior and exterior noise standards.	Consistent. The proposed Project's truck dock bays would be along the eastern perimeter of the industrial facility building, behind 10-foot-tall concrete screening walls. The building would screen the docks from residential and preschool use to the west (across Central Avenue) and the concrete walls would screen docks from residential uses to the north (across West 5 th Street and Meines Street).
Policy 4: Consider the compatibility of proposed land uses with the noise environment when preparing, revising or reviewing development proposals.	Consistent. As discussed in Section 6.2 of Appendix E, the Project is not a noise-sensitive land use and would be located in an area that meets the City's 75 CNEL normally acceptable noise and land use compatibility limit for industrial land uses.
Policy 7: Require that site-specific noise studies be conducted by a qualified acoustic consultant utilizing acceptable methodologies while reviewing the development of sensitive land uses or development that has the potential to impact sensitive land uses. Also require a site-specific noise study if the proposed development could potentially violate the noise provisions of the General Plan or City ordinance.	Consistent. As described in Chapter 5 of Appendix E, the noise impact analysis prepared for the proposed Project indicates the Project comply with applicable City standard related to noise and would not result in a significant noise impact on any noise sensitive land use.
Goal 7.2: Encourage the reduction of noise from transportation-related noise sources such as automobile and truck traffic	
Policy 3: Require that development generating increased traffic and subsequent increases in the ambient noise level adjacent to noise-sensitive land uses provide appropriate mitigation measures	Consistent. As described in Section 5.4.2 of Appendix E, the proposed Project would not generate a substantial increase in traffic or traffic-related noise levels on West 5 th Street or East 3 rd Street.
Goal 7.3: Protect residents from the effects of "spill over" or nuisance noise.	
Policy 2: Prohibit new industrial uses from exceeding commercial or residential stationary-source noise standards at the most proximate land uses, as appropriate. (Industrial noise may spill over to proximate industrial uses so long as the combined noise does not exceed the appropriate industrial standards.)	Consistent. As discussed in Section 5.4.1.1 and 5.4.1.2 of Appendix E, the proposed Project would not generate noise levels that exceed the City's exterior or interior noise standards at adjacent residential or commercial land uses.

Table 16: Project Consistency with Applicable General Plan Noise Policies	
General Plan Noise Element Goal/Policy	Consistency Analysis
Policy 3: Require that construction activities employ feasible and practical techniques to minimize noise impacts on adjacent uses. Particular emphasis shall be placed on the restriction of hours in which work other than emergency work may occur	Consistent. As discussed in Section 5.3.1 of Appendix E, the proposed Project would not result in significant construction noise impacts at any sensitive noise receptor. Best management practices are recommended for inclusion in the Project to reduce the potential for construction noise levels to annoy or interfere with adjacent land uses.
Action 1: As a condition of approval, limit non-emergency construction activities adjacent to existing noise-sensitive uses to daylight hours between 7:00 a.m. and 6:00 p.m. Discourage construction on weekends or holidays except in the case of construction proximate to schools where these operations could disturb the classroom environment	Consistent. The proposed Project would comply with the requirements in City Code Section 15.48.020.A and General Plan Goal 7.3, Action 1. Construction activities, including deliveries, shall only occur during the hours of 7:00 AM to 6:00 PM, Monday through Saturday. Construction activities shall be prohibited on Sundays and City- and Federal-observed holidays. Recommended best management practices would require the applicant and/or its contractor to post a sign at all entrances to the construction site informing contractors, subcontractors, construction workers, etc. of this requirement.
Action 3: Encourage the use of portable noise barriers for heavy equipment operations performed within 100 feet of existing residences or make applicant provide evidence as to why the use of such barriers is infeasible	Consistent. As shown in Table, the proposed Project would not involve construction activities within 100 feet of an existing residence or other noise-sensitive land use.

Off-Site Operational Noise Levels

The proposed project would generate vehicle trips that would be distributed onto the local roadway system and potentially increase noise levels along travel routes. Caltrans considers a doubling of total traffic volume to result in a three (3) dBA increase in traffic-related noise levels. If the proposed project would not result in a doubling of traffic volumes on the local roadway system, it would not result in a substantial permanent increase in traffic-related noise levels.

The proposed project would result in a net increase in trip generation equal to 105 total vehicle trips, or approximately 220 PCE trips, on a daily basis, which would be distributed onto West 5th Street and East 3rd Street. Although average daily traffic (ADT) volumes on West 5th Street and East 3rd Street were not collected for the project, recent traffic noise modeling for the San Bernardino Countywide Plan indicates 3rd street has a minimum ADT volume of several thousand vehicles. West 5th Street is assumed to have a higher ADT due to its direct connection to the I-210. The addition of project trips to these roadways would not result in a doubling of traffic volumes or a substantial change in off-site traffic noise levels. Impacts would be less than significant.

Exterior Noise Exposure and Land Use Compatibility

The City's General Plan Noise Element establishes 70 CNEL as the normally acceptable noise exposure limit for office land uses and 75 CNEL as the normally acceptable noise exposure limit for industrial land uses. The measured 24-hour CNEL value at LT-1 was determined to be 68.4 dBA CNEL, with short-term hourly ambient noise levels in the vicinity of the site also generally near or above 65 dBA Leq. The proposed project is not a noise-sensitive land use. As warehousing land use, elevated interior noise levels are not likely to interfere with speech or other communications. Workers and customers are unlikely to expect or require quiet conditions and the site plan does not include any large outdoor open space or exterior use areas intended for respite or relaxation. For these reasons, the proposed project would not be exposed to unacceptable exterior noise levels that exceed City General Plan noise and land use compatibility standards; impacts would be less than significant.

Interior Noise Level Compatibility

Part 2, California Building Code, Section 1206.4 establishes that interior noise levels attributable to exterior noise sources shall not exceed 45 dBA DNL or CNEL (as set by the local General Plan) in any habitable room. In addition, Chapter 5 of the California Green Building Standards Code sets forth that buildings exposed to a noise level of 65 CNEL (where noise contours are available) or 65 dBA Leq (1-hour where noise levels are not available) shall: 1) have exterior wall and roof-ceiling assemblies exposed to the noise source that meeting a composite STC rating of at least 50 (or a composite OITC) rating no less than 40, with exterior windows of a minimum STC of 40 or OITC 30 (Section 5.507.4.1); or 2) provide an interior noise environment attributable to exterior sources that does not exceed 50 dBA Leq in occupied areas during any hour of operation. In addition, County Code Section 83.01.080 (h) sets forth that warehousing areas shall be sound attenuated to meet an interior sound level of 65 dBA.

As described above, the proposed building's northern façade would be subjected to noise levels of approximately 68.4 dBA CNEL. Standard construction techniques and materials for new commercial/industrial buildings are commonly accepted to provide a minimum exterior to interior noise attenuation (i.e., reduction) of 30 to 32 dBA with all windows and doors closed, which would result in interior noise levels of approximately 38 dBA Leq for occupied rooms fronting West 5th Street or East 3rd Street. Thus, with standard construction techniques, the proposed project would satisfy interior building code noise requirements, and any impacts related to interior noise levels would be less than significant.

b) **Less than Significant Impact.** Project construction activities would involve the use of large equipment capable of generating ground-borne vibrations. Since project-specific construction equipment information is not available at this time, potential construction-related vibration impacts can only be evaluated based on the typical construction activities associated with a typical business park / warehousing development. Table 17 presents the estimated, worst-case vibration levels that could occur from the operation of the typical large and/or vibration-inducing construction equipment used to develop a business park / warehousing land use project. The equipment assumptions used in this Report are based on, and consistent with, the CalEEMod construction phasing, equipment usage, and operating schedules used to evaluate the proposed Project's potential construction air quality impacts.

Table 17: Potential Ground-borne Vibration Levels					
Equipment	PPV ^(A) (Inches/Second) at Distance				
	25 Feet	50 Feet	115 Feet	145 Feet	190 Feet

Vibratory Roller	0.21	0.098	0.039	0.030	0.023
Large Bulldozer	0.089	0.042	0.017	0.013	0.010
Small Bulldozer	0.03	0.001	0.001	0.00	0.000
Loaded Truck	0.076	0.035	0.014	0.011	0.008
Jackhammer	0.035	0.016	0.007	0.005	0.004
(A) Estimated PPV calculated as: $PPV(D) = PPV(ref) * (25/D)^{1.3}$ where $PPV(D)$ = Estimated PPV at distance; $PPV(ref)$ = Reference PPV at 25 ft; D = Distance from equipment to receiver; and n = ground attenuation rate (1.3 for competent soils).					

The potential for ground-borne vibration and noise is typically greatest when vibratory or large equipment such as rollers, impact drivers, or bulldozers are in operation. For the proposed Project, these types of equipment would primarily operate during site preparation, grading, and paving work. This equipment would, at worst-case and for very limited period of times, operate adjacent to the site's property lines and within approximately 25 feet of the crematory building façade to the east of the site, approximately 115 feet of the Highland Head Start building façade to the west of the site, approximately 145 feet to the tavern façade to the east of the site, and approximately 190 feet from the residence to the northeast of the site; however, most construction activities would generally take place hundreds of feet away from these building locations. A summary of predicted worst-case construction vibration levels is presented in Table 18.

Table 18: Summary of Predicted Construction Vibration Levels			
Scenario / Receptor	Estimated Duration	Maximum PPV, Vibratory Roller (inches/second)^(A)	Maximum PPV, Typical Equipment (inches/second)^(A)
Worst-Case Construction (25 feet from crematory building to the east)	1 day	0.210	0.089
Worst-Case Construction (115 feet from preschool building to the west)	1 week	0.039	0.017
Worst-Case Construction (145 feet from tavern to the east)	1 week	0.030	0.013
Worst-Case Construction (190 feet from residence to the northeast)	1 week	0.023	0.010
Source: FTA, 2018 and MIG (see Appendix B).			
(A) Values represent highest estimated ground-borne vibration level for vibratory roller and typical construction equipment (see Appendix B).			

As shown in Table 18, the proposed project's construction activities would have the potential to generate worst-case ground-borne vibration levels of approximately 0.210 in/sec PPV at non-residential buildings and 0.023 in /sec PPV at residential buildings, which could be perceptible per the Caltrans criteria for continuous vibration sources (0.012 in/sec PPV). These vibration levels are associated with the operation of a vibratory roller at the project boundary. All other equipment operating would not be perceptible and at no point during construction would project equipment generate ground-borne vibration that has the potential to damage the structural integrity of any buildings near the project site (0.30 in/sec PPV, see Appendix E. In addition, as the vibratory roller moves away from the property line, vibration levels would decrease. At approximately 105 feet, the vibratory roller would not produce vibrations that would be perceptible at building locations. The vast majority of construction activities would occur more than 105 feet from nearby buildings. Since the proposed project would not generate vibration that would be perceptible to receptors for a prolonged amount of time or generate ground-

borne vibration levels that would damage structures, it would not generate excessive ground-borne vibration or ground-borne noise levels, and as such, impacts would be less than significant.

c) **Less than Significant Impact.** The proposed project is located approximately 0.42 miles north of the nearest runway associated with the San Bernardino International Airport (SBIA). An airport land use compatibility plan has not been prepared for the SBIA, however, according to the City's zoning map, the proposed project site is located within SBIA Safety Zone E, which has negligible risk.³⁰ Noise contours prepared for the Eastgate Air Cargo Facility Final Environmental Assessment indicates the southern quarter of the proposed project site (the part of the site within approximately 140 feet of the right-of-way boundary for East 3rd Street) is within the airport's future 65 CNEL noise zone, which was developed assuming approximately 240 average daily and 87,617 total annual aircraft operations in 2024.³¹ The project is not a noise-sensitive land use that would be prohibited within the potential 65 CNEL noise contour associated with the SBIA. There are no outdoor uses associated with the project in the potential 65 CNEL contour area other than parking, and standard exterior-to-interior noise attenuation would result in interior noise levels that are less 45 CNEL. Therefore, the proposed project would not expose people working in the project area to excessive airport related noise levels, impacts would be less than significant.

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Exhibit 7 Modeled Construction Noise Receptors

CHIPT Highland West Warehouse Building and Office Space
Highland, California

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Ex. 8 Operational Noise Sources & Property Line Receiver Locations

CHIPT Highland West Warehouse Building and Office Space
Highland, California

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4.13 – Population and Housing

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) **Less than Significant Impact** The project site is designated for commercial and light industrial uses and is comprised of some vacant land with multiple buildings used for mostly for equipment storage and manufacturing. The project is in compliance with the City of Highland General Plan Land Use Designation and Zoning Ordinance.³² The project site is zoned as Business Park for light industrial, retail, and office-related uses. Since the project is consistent with this criterion, the project is consistent with the anticipated buildout of the City's General Plan and will not induce any unplanned population growth. Impacts will be less than significant.

b) **No Impact.** No housing would be displaced as a result of project development and as such there will be no impact.

4.14 – Public Services

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) **Less than Significant Impact.** The project is located in the service area of the City of Highland Fire Department. The Fire Department responds to medical emergencies, hazardous materials incidents, rescue calls, and motor-related accidents, in addition to regular fire suppression services. There are three stations in Highland: 26974 Base Line; 29507 Base Line; and 7649 Sterling Avenue, Highland, CA. 92346.³³ The nearest location in Highland is Station 541 located approximately one mile north of the project site at 26974 Base Line Street. The project includes construction of an industrial facility and associated parking and landscaping improvements. Any future tenants of the industrial facility that would be storing and using hazardous materials would be required to adhere to local and state ordinances pertaining to the handling and storage of such materials. The project is anticipated to create an incremental increase in demand for fire services. Development of the project would include adequate fire access. In addition, Development Impact Fees that are collected at the time of building permit issuance for approved projects will offset incremental impacts of development on demand for services. Fees go towards fire facilities and charge a rate of \$0.25 per square foot of office space, and \$7.2 per square foot of industrial space.³⁴ Impacts related to expansion of fire protection services will be less than significant.

b) **Less than Significant Impact.** The project is located within the service area of the San Bernardino County Sheriff, which the City of Highland contracts services from. The Highland Station is located at 26985 East Baseline Highland, CA. 92346, approximately 1 mile north of the project site.³⁵ Development of the project site will generate an incremental increase in the need for police protection in the project area. However, this incremental increase is consistent with build out of the City's General Plan. The Police Department reviews its needs on a yearly basis and adjusts service levels as needed to maintain an adequate level of public protection. Additionally, Development Impact Fees collected at the time of building permit issuance will offset incremental impacts of development on demand for services. Fees go towards law enforcement facilities and charge a rate of \$0.16 per square foot of office space, and

\$0.01 per square foot industrial space.³⁶ Therefore, a less than significant impact to police services will occur.

c) **Less than Significant Impact.** The project includes construction of a industrial facility and associated parking and landscape improvements. The project will not result in any direct population growth, or associated growth in students, within the San Bernardino City Unified School District. As most of the employees that would staff the industrial facility could be reasonably expected to come from the local population, an increase of school populations is unlikely. However, payment of development impact fees required under State law would offset the cost of increased demand on school district facilities in the future. The City of Highland has established a school fee charge a rate of \$0.78 per square foot developed.³⁷ Any project impacts on school facilities would be less than significant.

d) **Less than Significant Impact.** Development of the project could have the potential to impact demand on parks and recreation facilities if it induced substantial population growth in the vicinity. However, staffing of the industrial facility is expected to come from the local population. As such, the proposed light industrial development will not result in any direct population growth that would require expansion or acquisition of recreational facilities. Less than significant impacts will occur.

e) **Less than Significant Impact.** The project is not expected to create an increase in residents that would generate additional demand for public facilities such as libraries or hospitals and potential impacts would be less than significant.

4.16 - Recreation

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

a) **No Impact.** The project includes construction of a 141,066 sq.ft. industrial facility. Employees of the industrial facility would be drawn from existing residents within or near the City of Highland. As such, the project itself would not create demand for additional parks, or other recreational activities as the workforce will be drawn from the existing population of the area and from additional housing planned by the City to accommodate anticipated buildout of the City's General Plan. Any impacts to recreational facilities would be less than significant.

b) **No Impact.** The project does not include any recreational facilities or require the construction of new facilities, and there would not be an adverse physical effect to the environment. Therefore, there would be no impact.

4.15 – Transportation

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A trip generation assessment for the proposed project was prepared by Urban Crossroads, Inc., dated June 9, 2022 (See Appendix L) and a vehicle miles traveled (VMT) screening evaluation was prepared by Urban Crossroads Inc., dated June 10, 2022 (See Appendix F). The information presented below is provided from the aforementioned evaluation.

a) **Less than Significant Impact.** The analysis was prepared to determine whether the project meets the VMT requirements for the San Bernardino County Transportation Authority (SBCTA) Guidelines and screens out from needing to conduct a detailed analysis. Table 19, *Project Trip Generation*, shows the estimated trip generation for the project based on trip generation rates collected from the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021). The vehicle mix was also determined using the ITE Manual. The forecast was determined by using ITE Land Use Code 150 to derive site specific trip generation estimates for the 146,066 square feet warehousing project, which includes the storage of materials and the use of office and maintenance areas. As shown in Table 19, the project is forecast to generate approximately 254 daily trips.

Table 19
Project Trip Generation

Proposed Project Trip Generation Summary									
Land Use	Source	Units	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Warehousing (Proposed Project Total: Actual Vehicles)	ITE 150	TSF	19	5	24	6	18	24	254
Trips Generation Comparison									
Land Use	Quantity	Units	AM Peak Hour			PM Peak Hour			Daily

			In	Out	Total	In	Out	Total	
Warehousing	146.066	TSF	19	5	24	6	18	24	254
- Proposed Project/Existing:			-9	-4	-13	-6	-11	-17	-149
Net Change - Total Trips			10	1	11	0	7	7	105
Source: Urban Crossroads, 2022. (See Appendix E)									
Notes:									
TSF = Thousand Square Feet									

Public Transit

Based on the SBCTA Screening Tool, the project site is not located within ½ mile of an existing major transit stop, or along a high-quality transit corridor. The two nearest bus stops to the project site are off 3rd Street on Hangar Way serving Route 15, and the 9th Street and Victoria Ave. bus stop also serving Route 15.³⁸ The proposed Project will not remove or impact any of these bus stops and will not interrupt service to any of these bus stops during either construction or operation. The proposed project would also not significantly increase or decrease the use of these facilities as a result of construction or operation. As such, the project will not have an impact on transit.

Pedestrian and Bicycle Facilities

Pedestrian and Bicycle facilities vary at different points around the project site. A concrete sidewalk is accessible along 5th Street starting at the northwest corner of the project site at the intersection of 5th Street and Central Ave., and ends at the second driveway on the site. There is no sidewalk along the project site on Central Ave., rather there is a large stretch of flat dirt separating the project site from the road. Along 3rd Street there is a concrete sidewalk that begins just after the intersection of Central Ave. and 3rd Street at the southwest corner of the project site and continues through the entire southern boundary of the site. According to the Circulation Element of the City of Highland General Plan, there is a Class II Bike Lane that runs along the northern boundary of the project site on 5th Street.³⁹ A Class II Bicycle Lane is a dedicated lane for bicycle travel adjacent to traffic and is marked with a painted white line separating bicycles from automotive traffic. There is a bicycle lane on 3rd Street that runs on the south side of the site, and is marked by double white lines, but is not indicated in the City's General Plan.⁴⁰ As a result of project construction, the existing sidewalks along 3rd and 5th Streets will be improved and connected with a newly constructed sidewalk on Central Ave. Project construction will not influence bicycle facilities along 3rd and 5th Streets, and will improve pedestrian facilities around the site, therefore, impacts will be less than significant.

b) **Less than Significant Impact.** In December 2018, the California Natural Resources Agency certified and adopted the updated CEQA Guidelines package. The amended CEQA Guidelines, specifically Section 15064.3, recommend the use of Vehicle Miles Travelled (VMT) as the primary metric for the evaluation of transportation impacts, under CEQA, associated with land use and transportation projects. In general terms, VMT quantifies the amount and distance of automobile travel attributable to a project or region. All agencies and projects State-wide are required to utilize the updated CEQA guidelines recommending the use of VMT for evaluating transportation impacts as of July 1, 2020.

CEQA Guidelines allow for lead agency discretion in establishing methodologies and thresholds provided there is substantial evidence to demonstrate that the established procedures promote the intended goals of the legislation. Based on consultation with City of Highland planning and engineering staff, SBCTA Guidelines are used to provide information on appropriate VMT screening thresholds for when a project is expected to cause a less than significant impact without conducting a detailed VMT study. The VMT screening process was conducted with the SBCTA VMT Screening Tool, using criteria consistent with the SBCTA Guidelines. Below are the results of the screening criteria satisfaction for the project:

- | | |
|---|-----|
| 1. Is the project within ½ mile of an existing major transit stop or high-quality transit corridor? | No |
| 2. Is the project in a low VMT area? | No |
| 3. Does the project generate fewer than 110 daily trips? | Yes |

As detailed in Section 4.17.a, the proposed project is determined to have a less than significant impact on VMT since it satisfies one of more of the VMT screening criteria established by the SBCTA. The proposed project will generate approximately 254 daily trips, a net change of 105 trips, generating less than 110 daily trips per the screening criteria. The project will not conflict with a program plan, ordinance, or policy addressing the roadway circulation system, and impacts will be less than significant. No additional VMT modeling or mitigation measures are required.

c) **Less than Significant Impact.** A significant impact would occur if the proposed project substantially increased an existing hazardous design feature or introduced incompatible uses to the existing traffic pattern. Access to the site will be provided via 4 driveways, two 30 ft. wide driveways accessible for auto entry on the west side of the project site on Central Ave., as well as two driveways parallel to each other on 3rd and 5th Streets. Both driveways will be accessible for truck movement; the 5th Street driveway will be 40 ft. wide, whereas the 3rd Street driveway will be 35 ft. wide. The project does not involve any changes to the alignment or uses of existing roadways, and the proposed project is consistent with City of Highland zoning uses. Construction operations occurring on site will comply with the California Building Code adopted in the City of Highland Municipal Code. The proposed Project would not result in a traffic safety hazard due to any design features, and impacts would be less than significant.

d) **Less than Significant Impact.** A significant impact would occur if the design of the proposed project would not satisfy emergency access requirements of the City of Highland Fire Department or in any other way threaten the ability of emergency vehicles to access and serve the project site or adjacent uses. The proposed project would not result in inadequate emergency access. As discussed above, access to the site will be provided via four separate driveways: two on the west side of the site along Central Ave., both 30 ft. in width, one on 5th Street 40 ft. in width, and another on 3rd Street that is 35 ft. in width. The driveway width is sufficient to provide access to fire and emergency vehicles and is consistent with California Fire Code requirements. All access features are subject to and must satisfy the City of Highland design requirements, including the Fire Department's requirements. This project would therefore not result in adverse impacts with regard to emergency access. Impacts will be less than significant.

4.16 – Tribal Cultural Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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 Cultural 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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Tribal communications are ongoing and will be included with the City's input.

Utilities and Service Systems

Would the project:

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

a) **Less than Significant Impact.** The East Valley Water District (EVWD) delivers water to over 104,457 connections throughout its service area. The Special District receives its water from wells in the San Bernardino Basin Area (SBBA), which is managed by the San Bernardino Municipal Water District (SBMWD). EVWD's water supply consists primarily of groundwater from wells in the western portion of the service area. SBBA wells supply an estimated 80% of the total water supply. Additionally, Plant 134, an 8-MGD water treatment plant, provides surface water from the Santa Ana River and the State Water Project (SWP). 17 wells provide for 80% of the EVWD's water supply, at a rated capacity of 27,586 gallons per minute (GPM).⁴¹ Wastewater from the EVWD is treated to secondary levels at the San Bernardino Regional Wastewater Reclamation Plant and to tertiary levels at the Rapid

Infiltration/Extraction (RIX) Plant.⁴² The project is estimated to have a wastewater consumption of approximately 94,393 gallons per day (gpd).⁴³

Local water and sewer connections to the project site will remain intact and will not necessitate construction of new or expanded facilities in Highland. As described above in section 4.9a, new underground stormwater drainage connections and infiltration facilities will be constructed to serve the project area. As discussed in the Hydrology section, the project would not generate substantially increased runoff from new impermeable surfaces on site. As part of the plan, runoff from the site will be treated through an underground infiltration system located on the north side of the project site. Runoff will be directed to proposed catch basins and conveyed to the infiltration system under the site. No additional improvements are anticipated to either sewer lines or treatment facilities to serve the project. Standard connection fees will address any incremental impacts of the project. Therefore, the project will result in less than significant impact as a result of new or expanded water supply and wastewater treatment facilities.

Impacts related to electric power, natural gas, and telecommunications facilities would also be less than significant. The project will connect to existing facilities and will not require any extension of services. Therefore, the proposed industrial facility would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause a significant environmental effect. Less than significant impacts will occur.

b) Less than Significant Impact. According to the *San Bernardino Valley Regional 2015 Urban Water Management Plan (UWMP)*, the EVWD reported an estimated total demand of 31,609 total acre-feet (AF) in 2020.⁴⁴ The same estimates calculated a supply total 43,972 AF, a difference of 12,363 AF. The project would generate a marginal increase in additional demand for water from the EVWD's wells, relative to overall existing citywide demand. Based on calculations for water use (See Appendix A, Project Conditions Detailed Report), the industrial facility will use a total of approximately 34 million gallons of water annually, or approximately 105.73 AFY, which includes both indoor uses such as toilets and drinking fountains and outdoor use such as sprinklers for landscaping and parking lot upkeep. As the Urban Water Management Plan anticipates an overall increase in demand associated with development in the area over 2015 conditions, and the water demand for this project is within that demand assumption, impacts would be less than significant. The project would not substantially deplete water supplies, and the project would have a less than significant impact on entitled water supplies.

c) Less than Significant Impact. Potentially significant impacts could occur as a result of this project if it results in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. As detailed in Sections 4.19.a and 4.19.b, the project will be adequately served by existing wastewater treatment facilities. Therefore, a less than significant impact would occur.

d) Less than Significant Impact. Significant impacts could occur if the proposed project would exceed the existing permitted landfill capacity or violates federal, state, and local statutes and regulations. Solid waste disposal services in the City of Highland are provided by Burrtec Waste Industries. Waste from Highland is primarily transferred to the Mid-Valley Landfill in nearby Rialto, CA. The Badlands Landfill is as well located in Moreno Valley in Riverside County. Burrtec operate the East Valley Transfer and Recycling center in San Bernardino, where solid waste and recyclables are separated. According to CalRecycle, the Mid-Valley Landfill has a maximum capacity of 101,300,000 tons, with a remaining capacity of 61,219,377 tons measured June, 2019. Construction of the facility is anticipated to generate some solid waste, with an estimated total waste generation of 137.58 tons per year. Warehousing

facilities in Highland are estimated to generate 349 total generation tons of materials, which accounts for 2.9% of Highlands annual waste tonnage generated. This tonnage includes disposal materials, recyclables, and other items. The amount of waste that is generated from similar facilities is negligible compared to that produced by other business groups in Highland. Therefore, because there would be adequate landfill capacity in the region to accommodate project-generated waste, and the proposed project is not expected to generate a substantial quantity of solid waste, the impact would be less than significant.

e) **No Impact.** The proposed project is required to comply with all applicable federal, state, County, and City statutes and regulations related to solid waste as a standard project condition of approval. Therefore, no impact would occur.

4.17 – Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) **No Impact.** The project site is not located within or near any State Responsibility Areas as there are none in the City of Highland. There are no wildland conditions in the urbanized area where the project site is located. The City's general plan designates Interstates 10, 15, 215, and State Routes 30, 31, 60, 66, and 71 as evacuation routes, and the project will not interfere with the availability of these highways as evacuation routes.⁴⁵ Therefore, the project will not substantially impair any adopted emergency response plan or emergency evacuation plan, and no impact will occur.

b) **No Impact.** The project site is not located within a fire hazard zone, as identified on the Very High Fire Hazard Severity Zone (VHFHSZ) maps prepared by the California Department of Forestry and Fire Protection (CALFIRE).⁴⁶ However, the eastern portions of Highland are located within VHFHSZ's; the project site is approximately 5.4 miles west of this zone.⁴⁷ The project site is located in a heavily urbanized area and will not exacerbate wildfire risks, thereby exposing occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No impact will occur.

c) **No Impact.** The project site is not located within or near any State Responsibility Areas.⁴⁸ As a result, none of the project improvements would exacerbate fire risk or will result in a temporary or

ongoing impact from wildfires requiring the installation or maintenance of associated infrastructure that may exacerbate fire risk, or that may result in temporary or ongoing impacts to the environment. No impact will occur.

d) **No Impact.** The project site is not located within or near any State Responsibility Areas. According to the Federal Emergency Management Agency (FEMA) Flood Maps, the project site is in an area of 0.2% annual chance flood, 1% annual chance flood with average depths of 1 foot.⁴⁹ No impacts will occur.

4.18 – Mandatory Findings of Significance

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

a) **Less than Significant with Impact.** The proposed project would not substantially impact any scenic vistas, scenic resources, or the visual character of the area, as discussed in Section 4.1, and would not result in excessive light or glare. The project site is located within a developed area with no natural habitat. The proposed project would not significantly impact any sensitive plants, plant communities, fish, wildlife, or habitat for any sensitive species. Impacts to burrowing owl and migratory birds will be less than significant with mitigation and adherence to existing regulations. There are no jurisdictional waters on the project site.

The environmental analysis provided in Section 4.3 concludes that impacts related to emissions of criteria pollutants and other air quality impacts would be less than significant with mitigation. Sections 4.8 concludes that impacts related to climate change would be less than significant. Impacts related to hydrology and water quality would be less than significant. Based on the preceding analysis of potential impacts in the responses to items 4.1 thru 4.20, no evidence is presented that this proposed project would degrade the quality of the environment. Impacts related to degradation of the environment, biological resources, hydrology and water quality would be less than significant.

b) **Less than Significant Impact.** Cumulative impacts can result from the interactions of environmental changes resulting from one proposed project with changes resulting from other past, present, and future projects that affect the same resources, utilities and infrastructure systems, public services, transportation network elements, air basin, watershed, or other physical conditions. Such impacts could be short-term and temporary, usually consisting of overlapping construction impacts, as

well as long-term, due to the permanent land-use changes and operational characteristics involved with the proposed project. Cumulative impacts would be less than significant, as further discussed herein.

Aesthetics

Impacts related to aesthetics at the project-level have no potential for cumulative impacts because impacts are limited to on-site conditions and include no component that could result in similar impacts over time or space. Therefore, no cumulative impacts related to this topic would occur.

Agricultural Resources

The analysis provided in Sections 4.2 found that no individual impacts would occur; therefore, the Project could not contribute considerably to local agriculture or forestry.

Air Quality

The analysis provided in Section 4.3 related to air quality found that impacts would be less than significant; therefore, the project would not contribute to localized or regional cumulative impacts.

Biological Resources

The analysis provided in Section 4.4 found that no individual impacts to sensitive species or migratory birds would occur; therefore, the project would not contribute considerably to regional impacts on such species. It was also found that potential impacts to burrowing owls, nesting birds, and bats would be less than significant with adherence to existing regulations and the mitigation measures recommended. The project would have no other impacts on biological resources and would not result in localized or regional cumulative impacts. Mitigations for Biological Resources include the following:

BIO-1 Pre-construction Surveys for Nesting Birds. To the extent feasible, construction activities should be scheduled to avoid the nesting season. If construction activities are scheduled to take place outside the nesting season, all impacts to nesting birds protected under the MBTA and California Fish and Game Code would be avoided. The nesting season for most birds in San Bernardino County extends from February 1 through September 1.

If it is not possible to schedule construction activities between September 1 and January 31, then pre-construction surveys for nesting birds will be conducted by a qualified biologist to ensure that no nests would be disturbed during project implementation. These surveys will be conducted no more than 5 days prior to the initiation of any site disturbance activities and equipment mobilization, including tree, shrub, or vegetation removal, fence installation, grading, etc. If project activities are delayed by more than 5 days, an additional nesting bird survey will be performed. During this survey, the biologist will inspect all trees and other potential nesting habitats (e.g., trees and shrubs) in and immediately adjacent to the impact area for nests. Active nesting is present if a bird is building a nest, sitting in a nest, a nest has eggs or chicks in it, or adults are observed carrying food to the nest. The results of the surveys will be documented.

If an active nest is found sufficiently close to work areas to be disturbed by these activities, the qualified biologist will determine the extent of a construction-free buffer zone to be established around the nest (typically up to 300 feet for raptors and up to 100 feet for other species), to ensure that no nests of species protected by the MBTA and California Fish and Game Code will be disturbed during project implementation. Within the buffer zone, no site disturbance and mobilization of heavy equipment, including but not limited to equipment staging, fence installation, clearing, grubbing, vegetation removal, demolition, and grading will be permitted until the chicks have fledged.

A qualified biologist is an individual who has a degree in biological sciences or related resource management with a minimum of two seasonal years post-degree experience conducting surveys for nesting birds. During or following academic training, the qualified biologist will have achieved a high level of professional experience and knowledge in biological sciences and special-status species identification, ecology, and habitat requirements.

BIO-2 Pre-construction Surveys for Burrowing Owl. No more than 14 days prior to ground disturbance a focused survey for burrowing owl will be required to ensure take avoidance. Even though burrowing owls were not located as part of the general biological survey, a pre-construction survey for burrowing owl is required because burrowing owls may encroach or migrate to the property at any time, and therefore steps should be taken to ensure avoidance, including reevaluating the locations/presence of burrowing owl or burrows. Pre-construction surveys shall be conducted in accordance with the survey requirements outlined in Appendix D of the CDFW's *Staff Report on Burrowing Owl Mitigation*, dated March 7, 2012. If burrowing owl are found on the project site during pre-construction surveys, the biologist conducting surveys shall immediately contact the CDFW to develop a plan for avoidance and/or translocation prior to construction crews initiating any ground disturbance on the project site.

BIO-3: Roosting Bats. Before the start of construction-related activities (including but not limited to mobilization and staging, clearing, grubbing, tree removal, vegetation removal, fence installation, demolition, and grading), a survey of structures and tree cavities suitable for roosting bats and other roost habitats should be conducted within the project footprint, including a 50-foot buffer, by a qualified biologist within 30 days before commencement of any site disturbance activities and equipment mobilization. If suitable structures, tree cavities, or other roost habitats are found, an emergence survey of the cavities should be conducted by a qualified biologist for colony bat roosts before the onset of construction-related activities. If a rare bat species, an occupied maternity, or a colony roost is detected, CDFW shall be consulted to determine appropriate measures, such as bat exclusion methods, if the roost cannot be avoided. The results of the surveys shall be documented. Echolocation surveys may be needed to verify the presence of bats, or an exclusion zone around the occupied tree may be recommended until bats leave the roost. The qualified bat biologist should be contacted immediately if a bat roost is discovered during project construction.

Cultural Resources

The analysis provided in Section 4.5 and the Historical/Archaeological Resources Survey found that no impacts to historic or archaeological resources will occur as a result of project construction and operation.

Energy

The analysis provided in Section 4.6 found that no individual impacts related to energy use would occur as a result of the proposed project. Therefore, the project will not contribute to cumulative energy impacts.

Geology and Soils

Impacts related to geology at the project-level have no potential for cumulative impacts. Therefore, the proposed project would have no contribution to potential geological or soil degradation or other such impacts. As such, no cumulative impacts related to this topic would occur.

Greenhouse Gas Emissions

As discussed in Section 4.8, climate change is the result of numerous, cumulative sources of greenhouse gas emissions all over the world. The project would not contribute considerably to global climate change.

Hazardous Materials

The analysis provided in Section 4.9 related to hazards and hazardous materials found that impacts would be less than significant. Compliance with all regulations related to the disposal and storage of household hazardous waste would ensure that impacts would be less than significant.

Airport Hazards

Impacts related to airport hazards at the project-level have no potential for cumulative impacts because impacts are limited to on-site conditions and include no component that could result in similar impacts over time or space. Therefore, no cumulative impacts related to this topic would occur.

Wildfires

The analysis provided in Section 4.9(g) and 4.20 found that no individual, local, or regional impacts would occur; therefore, no cumulative impacts related to this topic would occur.

Groundwater Levels

The analysis provided in Section 4.10 (b) found that less than significant local or regional impacts would occur; therefore, while the Project would contribute to individual, localized, or regional cumulative impacts, the project contribution would not be considerable.

Drainage/Water Quality

The analysis provided in Section 4.10 (a), (c), (d), (e), and (f), found that less than significant individual, local, or regional impacts would occur; therefore, while the proposed project would contribute to individual, localized or regional cumulative impacts, its contribution would not be considerable.

Flooding

The analysis provided in Section 4.10 (d) found that no regional impacts would occur; therefore, no cumulative impacts related to this topic would occur.

Land Use and Planning

The analysis provided in Section 4.11 related to Land Use and Planning found that impacts would be less than significant; therefore, while the proposed project would contribute to individual, localized, or regional cumulative impacts, its contribution would not be considerable.

Mineral Resources

The analysis provided in Section 4.12 related to mineral resources found that there would be no impact; therefore, while the project would contribute to localized or regional cumulative impacts, the project contribution would not be considerable.

Noise

As discussed in Section 4.12, on-site operational noise is not anticipated to result in perceptible increases in ambient noise with the implementation of Best Management Practices. Therefore, the proposed project would not contribute considerably to noise levels in the immediate vicinity of the project. The project would contribute to temporary increases in noise levels in the immediate project vicinity during construction activities; however, Best Management Practices would be incorporated to ensure that impacts to nearby sensitive receptors remain less than significant. Therefore, the project would have no considerable contribution to cumulative noise impacts.

Population and Housing

The analysis provided in Section 4.14 related to Population and Housing found that no impacts would result; therefore, no cumulative impacts related to this topic would occur.

Public Services

The analysis provided in Section 4.15 related to Public Services found that impacts would be less than significant; therefore, while the proposed project would contribute to localized cumulative impacts, the contribution would not be cumulatively considerable.

Recreation

The analysis provided in Section 4.16 related to Recreation found that impacts would be less than significant; therefore, no cumulative impacts related to this topic would occur.

Traffic and Transportation

Traffic conditions were analyzed in Section 4.17 and found to be less than significant. The proposed project's contribution to cumulative impacts to local and regional transportation facilities would not be considerable.

Tribal Cultural Resources

This Section will be completed by the City of Highland Planning Department.

Utilities and Service Systems

The analysis provided in Section 4.19 related to Utilities and Service Systems found that impacts would be less than significant; therefore, while the project would contribute to localized or regional cumulative impacts, the project contribution would not be considerable.

Wildfire

The analysis provided in Section 4.20 related to Wildfire found that no impacts would result; therefore, no cumulative impacts related to this topic would occur.

c) **Less than Significant Impact.** The proposed project would not have environmental effects which would cause substantial adverse effects on humans, either directly or indirectly, as noted in the previous sections above.

References

4.19 – List of Preparers

City of Highland

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- Chris Dugan, Director of Air Quality, GHG, and Noise Services
- Betty Kempton, Senior Biologist and GIS Analyst
- Duncan Edwards, Assistant Planner

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- Alexander So, Senior Associate | VMT for Highland West
- Charlene So, Principal | Highland West Trip Generation Assessment

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- Robert G. Trazo, Principal Engineer | Geotechnical Investigation and Infiltration Report
- Joseph Lozano Leon, Staff Engineer | Geotechnical Investigation and Infiltration Report

Partner Engineering and Science, Inc.

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- Brian T. Godbois, Project Manager | Soil Management Plan, Phase I Environmental Site Assessment Report
- Hunter White, Project Manager | Soil Management Plan
- Debbie Scott, Principal | Phase I Environmental Site Assessment Report
- Adrew Gwin, Project Scientist | Environmental Site Assessment Report
- Mark Lambson, Principal | Environmental Site Assessment Report
- Samantha J. Fujita, Technical Director | Subsurface Investigation

Kier + Wright Engineers

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- John Ong, PE, Senior Civil Engineer
 - Preliminary Water Quality Management Plan
 - Drainage and Hydrology

4.20 – *Persons and Organizations Consulted*

- N/A

BIO-1 Pre-construction Surveys for Nesting Birds.

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colony bat roosts before the onset of construction-related activities. If a rare bat species, an occupied maternity, or a colony roost is detected, CDFW shall be consulted to determine appropriate measures, such as bat exclusion methods, if the roost cannot be avoided. The results of the surveys shall be documented. Echolocation surveys may be needed to verify the presence of bats, or an exclusion zone around the occupied tree may be recommended until bats leave the roost. The qualified bat biologist should be contacted immediately if a bat roost is discovered during project construction.

CUL-1: Buried Cultural Resources.

If buried cultural materials are discovered inadvertently during any earth-moving operations associated with the project, all work within 50 feet of the discovery should be halted or diverted until a qualified archaeologist can evaluate the nature and significance of the finds

5.1 – Bibliography

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