September 2022 | Initial Study

GIANT RV FACILITY

City of Colton

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PLACEWORKS

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Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ACM	asbestos-containing materials
ADT	average daily traffic
amsl	above mean sea level
AQMP	air quality management plan
AST	aboveground storage tank
BAU	business as usual
bgs	below ground surface
BMP	best management practices
CAA	Clean Air Act
CAFE	corporate average fuel economy
CalARP	California Accidental Release Prevention Program
CalEMA	California Emergency Management Agency
Cal/EPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
Cal/OSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resources, Recycling, and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
cfs	cubic feet per second
CGS	California Geologic Survey
CMP	congestion management program
CNDDB	California Natural Diversity Database
CNEL	community noise equivalent level

Abbreviations and Acronyms

CO	carbon monoxide
CO_2e	carbon dioxide equivalent
Corps	US Army Corps of Engineers
CSO	combined sewer overflows
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	environmental impact report
EPA	United States Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GHG	greenhouse gases
GWP	global warming potential
HCM	Highway Capacity Manual
HQTA	high quality transit area
HVAC	heating, ventilating, and air conditioning system
IPCC	Intergovernmental Panel on Climate Change
L_{dn}	day-night noise level
L_{eq}	equivalent continuous noise level
LBP	lead-based paint
LCFS	low-carbon fuel standard
LOS	level of service
LST	localized significance thresholds
M_W	moment magnitude
MCL	maximum contaminant level
MEP	maximum extent practicable
mgd	million gallons per day
MMT	million metric tons

Abbreviations and Acronyms

MPO	metropolitan planning organization
MT	metric ton
MWD	Metropolitan Water District of Southern California
NAHC	Native American Heritage Commission
NO_X	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
O_3	ozone
OES	California Office of Emergency Services
PM	particulate matter
POTW	publicly owned treatment works
ppm	parts per million
PPV	peak particle velocity
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
RMP	risk management plan
RMS	root mean square
RPS	renewable portfolio standard
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SIP	state implementation plan
SLM	sound level meter
SoCAB	South Coast Air Basin
SO_X	sulfur oxides
SQMP	stormwater quality management plan
SRA	source receptor area [or state responsibility area]
SUSMP	standard urban stormwater mitigation plan
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
TNM	transportation noise model

Abbreviations and Acronyms

tpd	tons per day
TRI	toxic release inventory
TTCP	traditional tribal cultural places
USACE	US Army Core of Engineers
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
UWMP	urban water management plan
V/C	volume-to-capacity ratio
VdB	velocity decibels
VHFHSZ	very high fire hazard severity zone
VMT	vehicle miles traveled
VOC	volatile organic compound
WQMP	water quality management plan
WSA	water supply assessment

Abbreviations and Acronyms

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1. Introduction

1.1 PROJECT OVERVIEW

The City of Colton is considering an application to permit construction and operation of a Giant RV facility, which includes construction of a 25,287-square-foot commercial building for recreational vehicle (RV) preparation and repair. The facility would operate as a "white-glove service" facility with no RV sales. The manufacturer would transport new RVs to the facility, and Giant RV staff would provide white glove service, with full inspection of the delivered RVs, some minor body work (e.g., touch-up painting, dent removal) if needed, any other minor repairs, and preparation to ship the RV to a Giant RV dealership in the region. The facility would not be open to the public—it would be for employees only. Between 5 and 10 RVs would be delivered to the facility each day. Once the RV is completely inspected, serviced, and washed, it would be stored onsite until shipped off to a dealership. Other site improvements include RV parking and circulation; display and wash areas; surface parking areas, driveways and drive aisles; utility and infrastructure improvements; tenant signage; and various hardscape, landscape, and lighting improvements. Project development and operation requires City approval of the following discretionary actions: conditional use permit, architectural/site plan review, and lot merger. The project comprises all proposed facilities, supporting improvements, and associated discretionary actions considered in this Initial Study.

1.2 PURPOSE OF CEQA AND INITIAL STUDY

CEQA (California Environmental Quality Act; Public Resources Code Section 21000 et seq.) and the CEQA Guidelines (14 Cal. Code Regs. Section 15000 et seq.) require that before a lead agency makes a decision to approve a project that could have one or more adverse effects on the physical environment, the agency must inform itself about and consider the project's potential environmental impacts, inform the public about the project's potential environmental impacts and provide an opportunity to comment on the environmental issues, and take feasible measures to avoid or reduce potential harm to the physical environment.

Colton—in its capacity as lead agency pursuant to CEQA Guidelines Section 15050—is responsible for preparing environmental documentation in accordance with CEQA to determine if approval of the discretionary actions and subsequent development associated with the proposed project would have a significant impact on the environment. As part of the project's environmental review and in its capacity as lead agency, the City authorized preparation of this Initial Study in accordance with the provisions of CEQA Guidelines Section 15063. Pursuant to Section 15063, purposes of an Initial Study are to:

- Provide the lead agency information to use as the basis for deciding whether to prepare an environmental impact report (EIR) or negative declaration.
- Enable an applicant or lead agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to quality for a negative declaration.

- Assist in the preparation of an EIR, if one is required.
- Facilitate environmental assessment early in the design of a project.
- Provide documentation of the factual basis for the finding in a negative declaration that a project will not have a significant effect on the environment.
- Eliminate unnecessary EIRs.
- Determine whether a previously prepared EIR could be used with the project.

As further defined by Section 15063, an Initial Study is prepared to provide the City with information to use as the basis for determining whether an EIR, Negative Declaration, or Mitigated Negative Declaration (MND) would be appropriate for providing the necessary environmental documentation and clearance for the proposed project.

In its preparation of this Initial Study, the City determined that the Initial Study would support the adoption of an MND. An MND is a written statement by the lead agency that briefly describes the reasons why a project that is not exempt from the requirements of CEQA will not have a significant effect on the environment and, therefore, does not require preparation of an EIR (CEQA Guidelines Section 15371). The CEQA Guidelines require preparation of an MND if the Initial Study prepared for a project identifies potentially significant effects, but: 1) revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed MND and Initial Study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and 2) there is no substantial evidence, in light of the whole record before the lead agency, that the project may have a significant effect on the environment. (CEQA Guidelines Section 15070[b]).

The City has considered the information in this Initial Study in its decision-making processes. Although the Initial Study was prepared with consultant support, the analysis, conclusions, and findings made as part of its preparation fully represent the independent judgment and analysis of the City.

Additionally, this Initial Study includes a Mitigation Monitoring and Reporting Program (MMRP), which was developed to provide a vehicle to monitor mitigation measures outlined in the Initial Study for the proposed project. The MMRP has been prepared in conformance with Section 21081.6 of the Public Resources Code and City of Irvine monitoring requirements. The MMRP will serve to document compliance with adopted/certified mitigation measures that are formulated to minimize impacts associated with the proposed project.

1.3 ENVIRONMENT SETTING

1.3.1 Project Location

The 6.5-acre Project Site is in the central region of the City of Colton, San Bernardino County. The Project Site, which has an address of 1301 E Santo Antonio Drive, consists of two mostly undeveloped parcels

(Assessor's Parcel Numbers 0276-144-030 and -031) on the north side of E Santo Antonio Drive, east of S Mt Vernon Avenue and south of the Reche Canyon Channel. Regional access to the Project Site is via State Route 215 (SR-215) to the south and Interstate 10 (I-10) to the north—local access is via S Mt Vernon Avenue. Figure 1, *Regional Location*, and Figure 2, *Location Vicinity*, show the Project Site in its regional and local contexts, respectively.

1.3.2 Existing Land Use

As shown in Figure 3, *Aerial Photograph*, the majority of the Project Site is undeveloped land that is heavily disturbed (annually disked) and devoid of vegetation. The site consists mainly of bare or exposed soil. The site is mostly flat with gentle slopes (slopes from 1 to 3 percent) from northeast to southwest, with the low point of the site near the intersection of E Santo Antonio Drive and S Mt Vernon Avenue. There is an existing water line within a public easement that runs along the northerly property line. There is also an existing parking easement and parking lot at the northeast corner of the Project Site, which serves the adjacent apartment complex. The parking area is not a part of the proposed project and would be protected in place. There is also an existing water house (enclosure with solid wall, roof top and swinging doors) within an easement near the southeast corner of the project. The water house would also be protected in place and is not a part of the project.

1.3.3 Surrounding Land Use

As shown in Figure 3, the Project Site is bounded by the Reche Canyon Channel to the north, with commercial and office uses beyond; E Santo Antonio Drive to the south, with commercial and retail uses beyond; Center Point Apartments to the east; and S Mt Vernon Avenue to the west, with office and residential uses beyond.

1.3.4 Environmental Resources

The Project Site consists of mostly undeveloped land and is void of any buildings or structures (see Figure 3). It is heavily disturbed, devoid of vegetation, and consists mainly of bare or exposed soil. The Project Site contains no historic buildings, housing, biological resources, scenic resources, mineral resources, or water bodies. Additional information regarding environmental resources on the Project Site—or the lack of such resources—can be found in Section 3, *Environmental Analysis*, of this Initial Study under each respective environmental topic.

1.3.5 Existing General Plan and Zoning

The prevailing planning and regulatory plans that govern development and use of the Project Site are the Colton General Plan and Zoning Ordinance (Chapter 18 of the Colton Municipal Code). The development and design standards and regulations in the Colton Zoning Ordinance implement the Colton General Plan and constitute the zoning regulations that govern development of the Project Site. Per the Colton General Plan land use map, the land use designation of the Project Site is General Commercial. The site is similarly zoned General Commercial (C-2) with Business District Sign Overlay. The General Commercial designations

permit a wide range of retail and commercial services, including auto services. The Project Site is also in the Residential Overlay (R-O), one of the City's overlay zones. The Residential Overlay provides, in addition to the base land use, the opportunity to develop residential uses in areas where convenient access to transit and neighborhood-serving uses is available.

1.4 PROJECT DESCRIPTION

Following is a detailed description of the proposed project's overall site plan and character and the various development features/elements and improvements that would be implemented as a part of the project.

1.4.1 Proposed Land Use

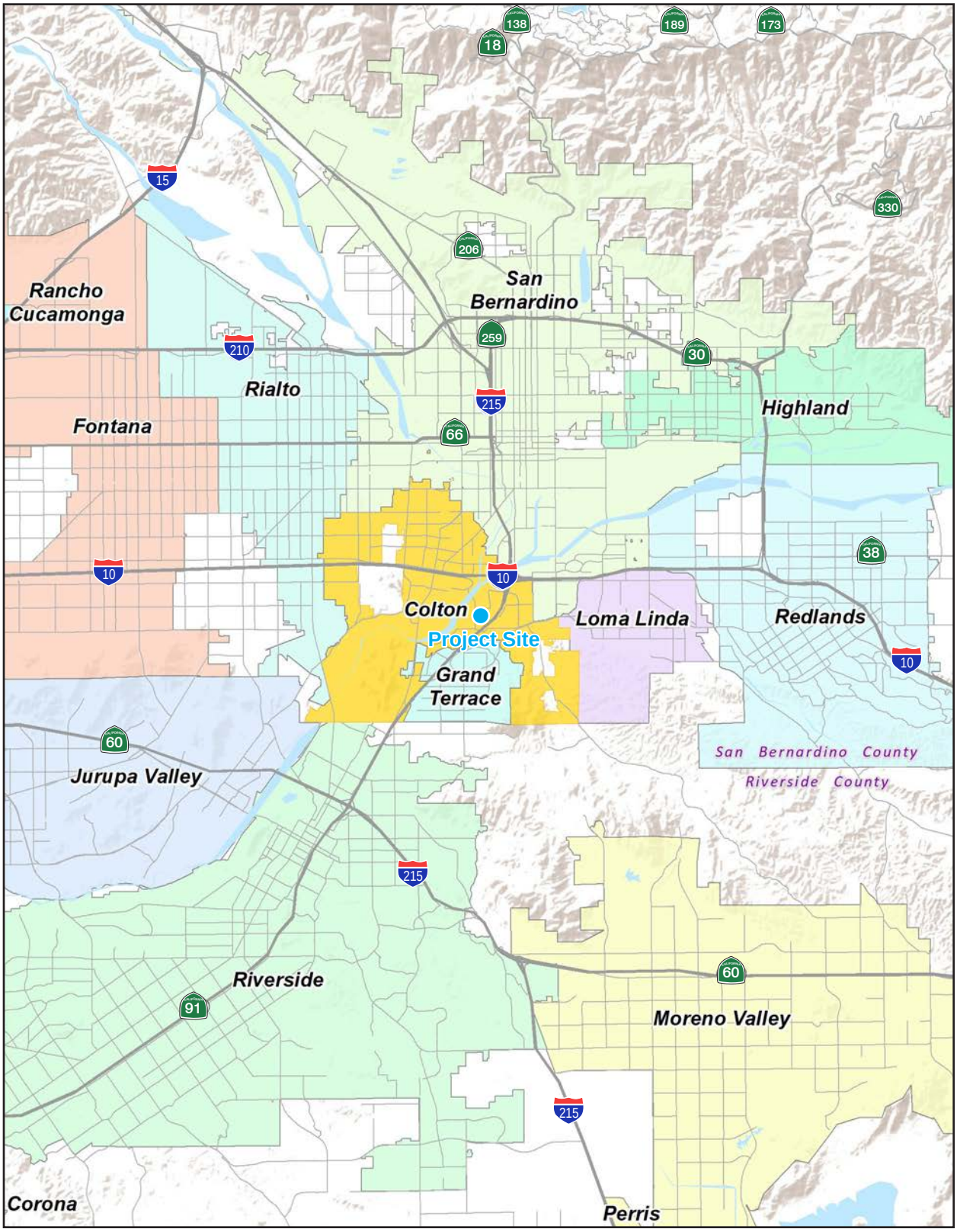
The proposed project involves the construction and operation of a Giant RV facility (Project), which includes construction of a commercial building and associated improvements and features needed for the proposed RV preparation and repair business. As described in Section 1.4.2, the facility would operate as a "white-glove service" facility, with no RV sales. Refer to Section 1.4.2 for a description of the Project's operational characteristics.

Figure 4, *Conceptual Site Plan*, illustrates the overall design of the Project Site resulting from Project implementation. As shown in Figure 4, the proposed building would be square shaped and would be placed in the center of the Project Site. The main building façade and entry are oriented to the west toward S Mt Vernon Avenue. The building would encompass a total of 25,287 square feet, with the first floor building area encompassing 21,443 square feet and the mezzanine comprising 3,844 square feet. The first floor would feature service bays with roll-up doors, a paint spray booth, office and open workspaces, a sale/service area, storage rooms, restrooms, and employee break/locker rooms. The mezzanine would be used for parts storage and would be accessed via stairs and an elevator. For clarification, the paint spray booth would be used periodically on an as needed basis for minor touch up painting/repairs only.

The western and eastern ends of the proposed building would feature large areas covered by canopies and paved with concrete. The canopy area on the western side would be used as an RV display area, and the canopy area on the eastern side would be used for the RV wash area. Also, concrete paving would be provided along the northern and southern ends of the proposed building, which are needed to accommodate the RV service bays.

Other site improvements/elements, which are described further below, include RV and vehicle parking areas, driveways and drive aisles, utility and infrastructure improvements, and various hardscape and landscape improvements.

Figure 1 - Regional Location



Note: Unincorporated county areas are shown in white.

Source: ESRI, 2022

0 3
Scale (Miles)

1. Introduction

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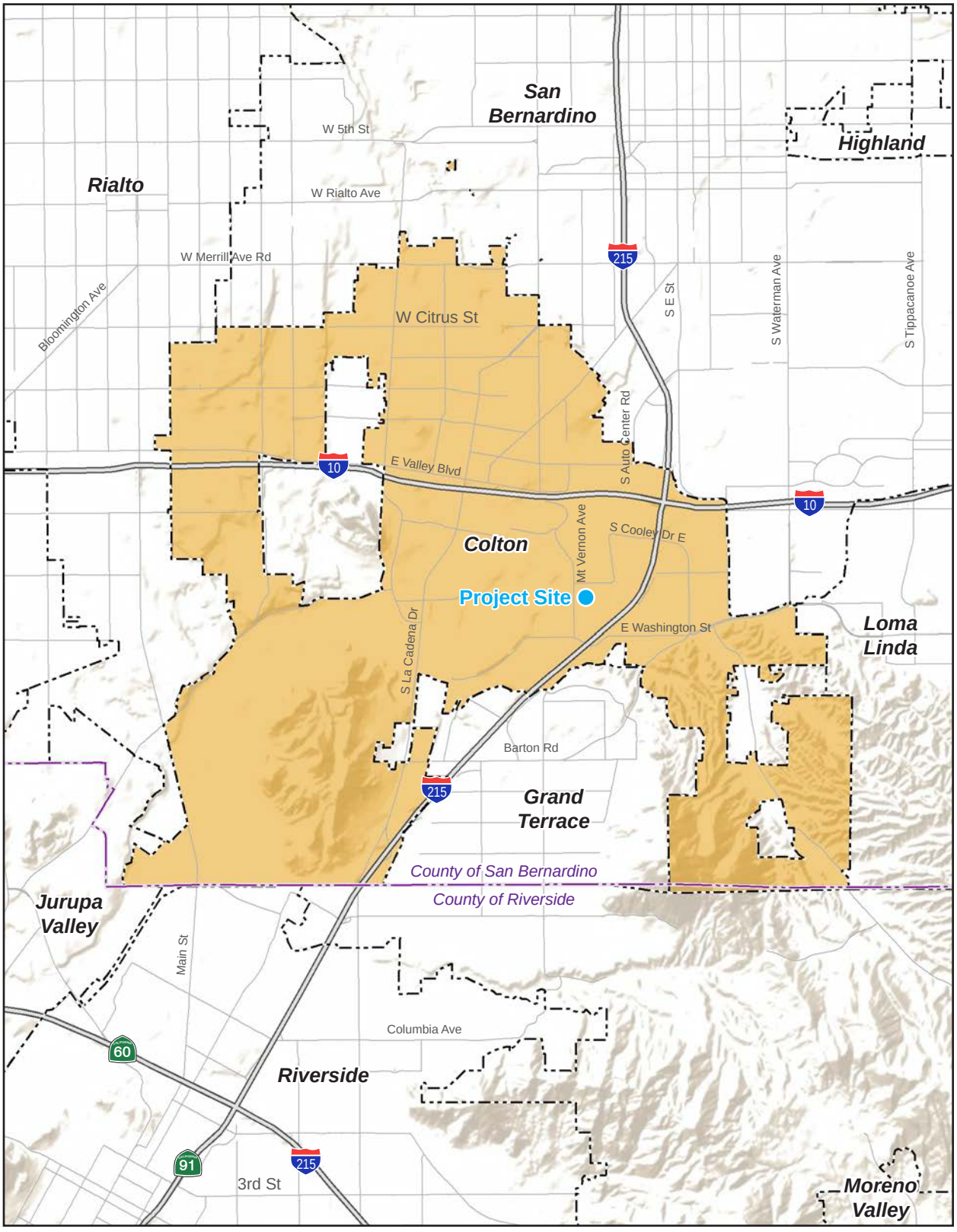
Figure 2 - Local Vicinity



City Boundary
County Boundary

0 1.5
Scale (Miles)

Source: ESRI, 2021

1. Introduction

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Figure 3 - Aerial Photograph

Project Boundary

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Scale (Feet)

Source: Nearmap, 2021

1. Introduction

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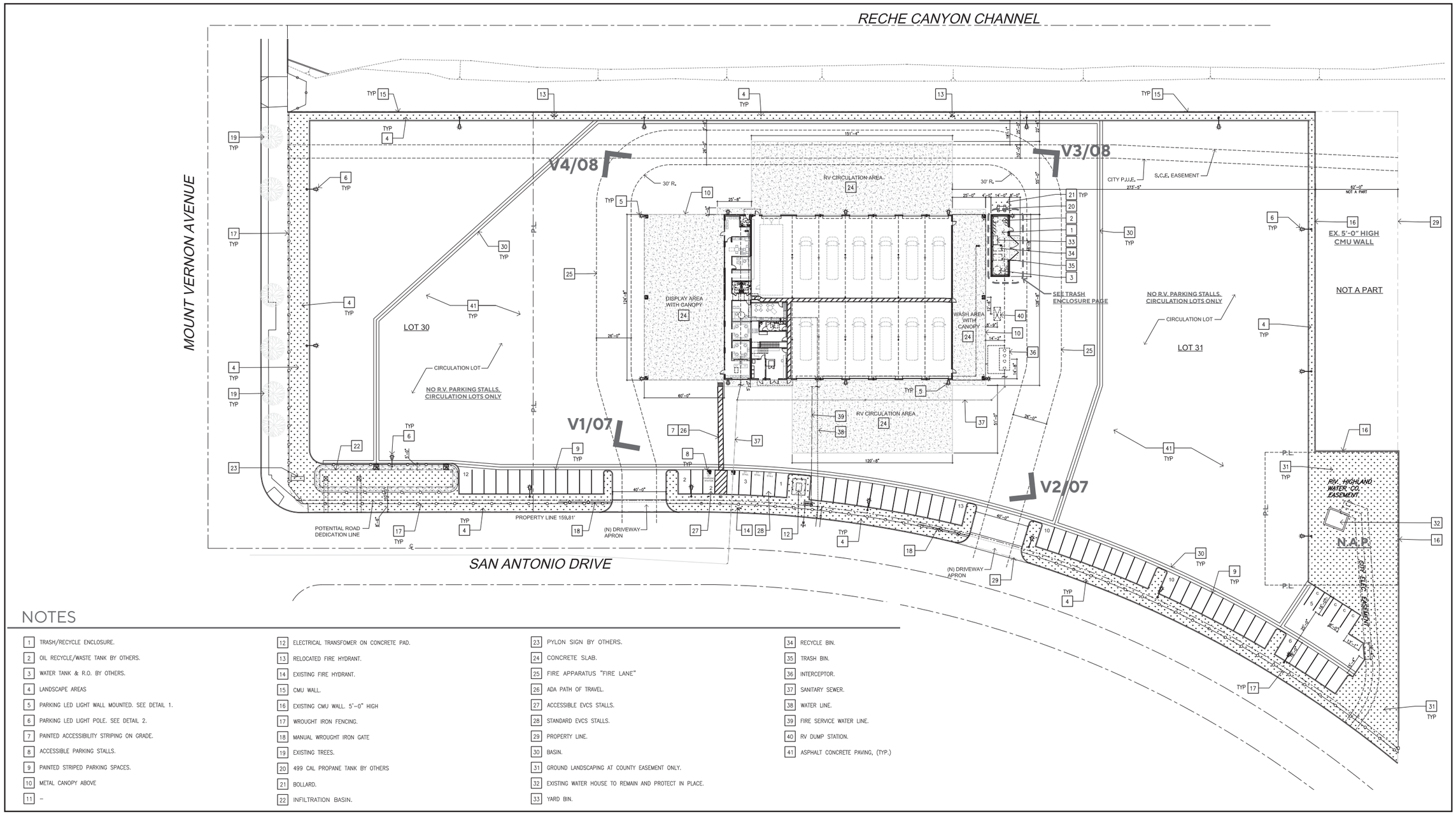
Figure 4 - Conceptual Site Plan



NOTES

1. TRASH/RECYCLE ENCLOSURE.
2. OIL RECYCLE/WASTE TANK BY OTHERS.
3. WATER TANK & R.O. BY OTHERS.
4. LANDSCAPE AREAS
5. PARKING LED LIGHT WALL MOUNTED. SEE DETAIL 1.
6. PARKING LED LIGHT POLE. SEE DETAIL 2.
7. PAINTED ACCESSIBILITY STRIPING ON GRADE.
8. ACCESSIBLE PARKING STALLS.
9. PAINTED STRIPED PARKING SPACES.
10. METAL CANOPY ABOVE
11. –
12. ELECTRICAL TRANSFOMER ON CONCRETE PAD.
13. RELOCATED FIRE HYDRANT.
14. EXISTING FIRE HYDRANT.
15. CMU WALL.
16. EXISTING CMU WALL. 5'–0" HIGH
17. WROUGHT IRON FENCING.
18. MANUAL WROUGHT IRON GATE
19. EXISTING TREES.
20. 499 CAL PROPANE TANK BY OTHERS
21. BOLLARD.
22. INFILTRATION BASIN.
23. PYLON SIGN BY OTHERS.
24. CONCRETE SLAB.
25. FIRE APPARATUS "FIRE LANE"
26. ADA PATH OF TRAVEL.
27. ACCESSIBLE EVCS STALLS.
28. STANDARD EVCS STALLS.
29. PROPERTY LINE.
30. BASIN.
31. GROUND LANDSCAPING AT COUNTY EASEMENT ONLY.
32. EXISTING WATER HOUSE TO REMAIN AND PROTECT IN PLACE.
33. YARD BIN.
34. RECYCLE BIN.
35. TRASH BIN.
36. INTERCEPTOR.
37. SANITARY SEWER.
38. WATER LINE.
39. FIRE SERVICE WATER LINE.
40. RV DUMP STATION.
41. ASPHALT CONCRETE PAVING, (TYP.)

0 75
Scale (Feet)

Source: AO, 2021

1. Introduction

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1.4.3 Operational Characteristics

Based on the proposed construction timeline (see Section 1.4.8, *Project Phasing and Construction*), it is anticipated that the Project would be operational by early summery 2023. The facility would operate as a "white-glove service" facility, with no RV sales. New RVs would be delivered to the facility directly from the manufacturer. Between 5 and 10 RVs would be delivered to the facility each day, where Giant RV staff would provide white glove service—with full inspection of the delivered RVs, possibly some minor body work (e.g., touch-up painting, dent removal) if needed (no major body work to be conducted onsite), any other minor repairs, and preparation of the RV to be shipped off to a Giant RV dealership in the region. Once the RV is completely inspected, serviced and washed, it would be stored on-site until being shipped off to a dealership.

Hours of operation are anticipated to be from 9:00 am to 7:00 pm, Monday through Thursday. It is anticipated that there will be 5 to 7 office workers and 8 to 10 service staff on-site each day. The facility would not be open to the public; it would be for employees only.

1.4.4 Architectural Design and Character

Figures 5a and 5b, *Conceptual Building Elevations*, and Figures 6a and 6b, *Conceptual Building Renderings*, illustrate the building height and conceptual elevations and the architectural design and features of the proposed building. As shown in the figures, the building would be a single story (up to 34 feet 10 inches in height) with high ceilings typical of the proposed use that would occupy the building. The building would incorporate a contemporary architectural style that expresses the building's proposed use. As shown in Figures 5 and 6, the massing of the building is broken up through the use of building features such as the large canopies on the western and eastern ends of the building and roll-up doors for the service bays on the northern and southern ends of the building as well as through variations in building materials and color. The building features and materials would be added to offset the building's massing and provide relief to and variation in the building form and style.

1.4.5 Landscaping, Walls, and Lighting

As shown in Figure 3, *Aerial Photograph*, the majority of the Project Site is undeveloped and devoid of vegetation. The site consists mainly of bare or exposed soil. The Project's landscape plan would feature new landscaping along the entire perimeter of the site. Approximately 13 percent of the Project Site would be landscaped. The site landscaping would include a variety of ornamental trees, shrubs, and groundcover that would help soften the massing of the building and various hardscape improvements (e.g., parking areas, drive aisles) and help provide visual relief for the Project Site. Also, landscaping (ground cover and plants) would be planted in the area surrounding the existing water house (near the southeast corner of the Project Site) that would remain. Proposed tree types include myrtles, ferns, and palms.

A wrought-iron fence would be provided along the entire western and southern site boundaries to secure the site. No fencing would be provided along the northern site boundary, which abuts the Reche Canyon Channel. Additionally, the existing five-foot-high block wall along the eastern site boundary, which belongs to the adjacent apartment complex, would remain. At its northwestern terminus, the proposed wrought-iron

fence would connect to the existing chain-link fence of the Reche Canyon Channel. At its southeastern terminus, the wrought iron fence would connect to the existing block wall of the apartments. Also, during nonbusiness hours the facility would be secured with manual wrought-iron gates at the two driveways.

Site lighting would consist of exterior, building-mounted light fixtures; interior lighting for the new building; lighting for work and common areas; lighting for the new parking areas; and security lighting.

1.4.6 Signage

Project development includes provision of the following sign types to help identify and promote the Project and its business.

- One Monument Sign
- One Building Wall Sign

1.4.7 Vehicular Access, Circulation, and Parking

As shown in Figure 4, *Conceptual Site Plan*, the majority of the Project Site would be paved for RV and vehicle circulation and parking needs. Vehicular access to the Project Site would be provided via two driveways off E Santo Antonio Drive. Both driveways would be full-access driveways (all turning movements permitted) that would connect to the Project Site's internal vehicular circulation and parking areas. As noted above, during nonbusiness hours the facility would be secured with manual wrought-iron gates at the two driveways.

Parking for employees and customers would be provided on-site in dedicated parking areas along the southern site boundary. Pursuant to the provisions of Chapter 18.36 (Parking and Loading Requirements) of the Colton Zoning Ordinance, 50 parking spaces are required, and the Project would provide 64 parking spaces. Additionally, pursuant to the provisions of the Colton Zoning Ordinance and the most current (2019) California Green Building Standards Code (CALGreen; Title 24, California Code of Regulations, Part 11), which are codified in Chapter 15.11, Green Building Code, of the Colton Municipal Code, parking spaces for accessible (two spaces) and clean-air (four spaces) vehicles would be provided among the 64 spaces. All clean air vehicle parking spaces would be provided with infrastructure for the addition of future electric vehicle charging stations.

1.4.8 Infrastructure Improvements and Utility and Service Systems

Following is a discussion of the infrastructure improvements and utility and service systems needed to accommodate the Project. All proposed improvements would require City approval and, where necessary, approval from the utility/service provider.

Figure 5a - Conceptual Building Elevations

0 30
Scale (Feet)

Source: AO, 2021

1. Introduction

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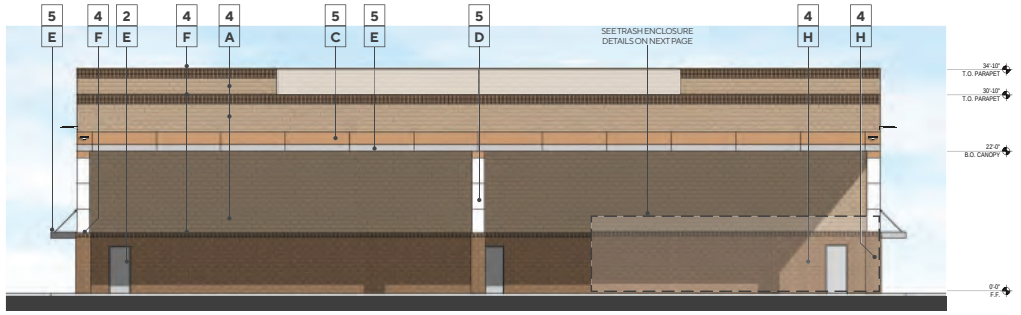
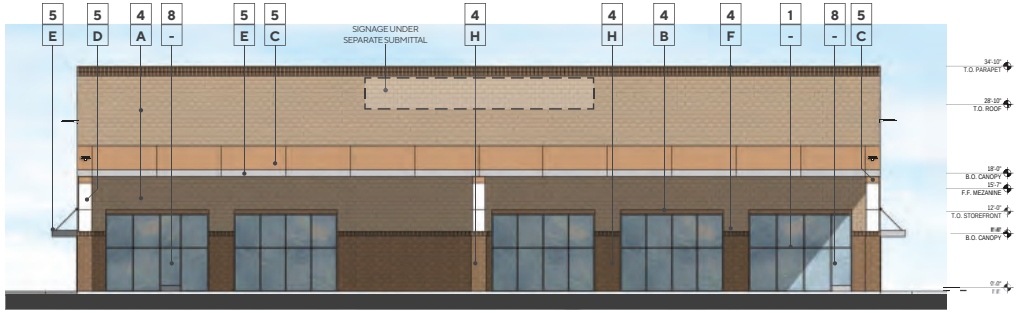
Figure 5b - Conceptual Building Elevations



3. EAST ELEVATION



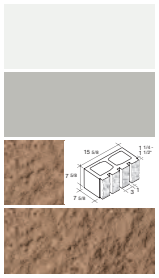
4. WEST ELEVATION

MATERIALS

1 – ALUMINUM STOREFRONT SYSTEM.
2 – DOOR – PAINTED FINISH.
3 – ROLL-UP DOOR – PAINTED FINISH.
4 – CMU.
5 – PAINTED METAL CANOPY.
6 – –
7 – SIGNAGE, N.I.C. UNDER SEPARATE PERMIT. PROVIDE J BOX & POWER
8 – ENTRY DOOR.
9 – –

COLORS & FINISHES

– A – ANGELUS BLOCK: PRECISION, "CHAMPAGNE"
– B – ANGELUS BLOCK: PRECISION, "DRIFTWOOD"
– C – 20 GAUGE PAINTED METAL: SHERWIN WILLIAMS, 6117 "SMOKEY TOPAZ"
– D – 20 GAUGE PAINTED METAL: SHERWIN WILLIAMS, 7006 "EXTRA WHITE"
– E – 20 GAUGE PAINTED METAL: SHERWIN WILLIAMS, 7065 "ARGOS"
– F – SPLIT FACE BLOCK: 8X8X16 301 SCORE 1 SIDE, "DRIFTWOOD"
– G – SPLIT FACE BLOCK: 12X8X16 202 SCORE 1 SIDE, "DRIFTWOOD"
– H – ANGELUS BLOCK: SPLIT FACE, "DRIFTWOOD"

0 30
Scale (Feet)

Source: AO, 2021

1. Introduction

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Figure 6a - Conceptual Building Renderings

1. PERSPECTIVE VIEW - SOUTHWEST CORNER

2. PERSPECTIVE VIEW - SOUTHEAST CORNER

Source: AO, 2021

1. Introduction

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Figure 6b - Conceptual Building Renderings

3. PERSPECTIVE VIEW - NORTHEAST CORNER

4. PERSPECTIVE VIEW - NORTHWEST CORNER

Source: AO, 2021

1. Introduction

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1.4.8.1 WATER SYSTEM

The City would provide water delivery service to the Project Site. As a part of the Project, new onsite water lines for general water use would connect to the existing 16-inch water main in South Highland Avenue. A separate water line for fire suppression purposes would be provided onsite and also connect to the 16-inch water main. No offsite water line construction or upsizing would be required to accommodate the Project. However, some construction would occur within the public right-of-way of South Highland Avenue to make the necessary infrastructure connections to the existing water main. The proposed water system improvements would be designed and constructed in accordance with City requirements and would require City approval.

The final design of the water system improvements would be determined based on the approved Colton Fire Department fire plan to assess whether the existing 16-inch main in South Highland Avenue is adequately sized to provide the needed fire flow. Fire hydrants would be installed at key locations onsite (along the southern and northern site boundaries), as required by Colton Fire Department. The fire hydrants would connect to the new onsite water lines.

1.4.8.2 WASTEWATER SYSTEM

The City would provide wastewater collection and conveyance service to the Project Site. Effluent generated by the Project would be conveyed the City's municipal sewer system and treated at the City's wastewater treatment plant. As a part of the Project, new onsite sewer lines would connect to the existing sewer main in South Highland Avenue. No offsite sewer line construction or upsizing would be required to accommodate the Project. However, some construction would occur within the public right-of-way of South Highland Avenue to make the necessary infrastructure connections to the existing sewer main. The proposed wastewater system improvements would be designed and constructed in accordance with City requirements and would require City approval.

1.4.8.3 DRAINAGE SYSTEM

As shown in Figure 3, *Aerial Photograph*, the majority of the 6.5-acre Project Site is undeveloped land that is heavily disturbed (annually disked) and devoid of vegetation. There is an existing parking easement and parking lot (about 0.31 acre of the site) at the northeast corner of the Project Site that is fully paved and serves the adjacent apartment complex. The site is mostly flat, with gentle slopes (slopes from 1 to 3 percent) from northeast to southwest, and the low point of the site is near the intersection of E Santo Antonio Drive and S Mt Vernon Avenue. Drainage from the undeveloped portion of the Project Site is via sheet flow from the northeast to the southwest toward E Santo Antonio Drive. The parking lot does not drain to the Project Site, but to the apartment property—this drainage condition would remain.

Under proposed conditions and upon Project completion, the Project Site would have approximately 87 percent impervious surface area (e.g., buildings, paving), and the remaining 13 percent would be pervious (e.g., landscaping). Project development would be consistent with existing drainage pattern, and drainage would continue to flow southwest via new onsite drainage collection, conveyance, and treatment systems. A series of new valley gutters would convey the Project Site runoff to the proposed infiltration basin at the

southwest corner (low point) of the Project Site. The infiltration basin would be designed to hold the design storm event, with any treated overflow discharging from the basin via outlets to the existing street flowline in E Santo Antonio Drive.

1.4.8.4 SOLID WASTE AND RECYCLING SYSTEM

Solid waste and recycling generated by the Project would be collected and hauled away by CR&R Incorporated and transported to the material recovery, transfer, and disposal facility in Colton. An enclosure with solid rooftop and swinging gates would accommodate bins for solid waste, organic waste, and recyclable materials near the northeastern end of the proposed building. The enclosure would also house a tank for storing oil waste.

1.4.8.5 UTILITIES AND SERVICE SYSTEM

Plans for utilities and service systems that would serve the Project include provision of electricity (City of Colton Electric Utility), natural gas (Southern California Gas Company), and telecommunications (Spectrum, Frontier, and AT&T). All new utility infrastructure would be installed underground or placed in enclosed spaces (e.g., utility closets).

1.4.9 Green Building Standards

According to the US Green Building Council, green building is the practice of designing, constructing and operating buildings to maximize occupant health and productivity, use fewer resources, reduce waste and negative environmental impacts, and decrease life cycle costs (ACI 2020). The Project would be designed and constructed using green building practices, including those of the most current California Building Energy Efficiency Standards (Title 24, California Code of Regulations, Part 6) and CALGreen (Title 24, California Code of Regulations, Part 11), which is incorporated by reference in Chapter 15.11, Green Building Code, of the Colton Municipal Code. The Building Energy Efficiency Standards contain energy and water efficiency requirements (and indoor air quality requirements) for newly constructed buildings, additions to existing buildings, and alterations to existing buildings. CALGreen is California's statewide "green" building code. Its purpose is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts that have a reduced negative impact or positive environmental impact and by encouraging sustainable construction practices in the following categories: planning and design, energy efficiency, water efficiency and conservation, water conservation and resource efficiency, and environmental quality.

As proposed, Project development would include mandatory standards from CALGreen Divisions 5.1, Planning and Design; 5.2, Energy Efficiency; 5.3, Water Efficiency and Conservation; 5.4, Material Conservation and Resource Efficiency; and 5.5, Environmental Quality. Some of the specific green building standards include but are not limited to:

- Bicycle parking
- Designated parking for clean air vehicles
- Electric vehicle charging (facilitate future installation of electric vehicle supply equipment)

- Light-pollution reduction
- Water-conserving plumbing fixtures and fittings
- Construction waste reduction, disposal, and recycling
- Recycling by occupant
- Finish-material-pollutant control

1.4.10 Project Phasing and Construction

Project development is anticipated to be completed in three development phases: clearing, grading, and construction. Overall construction is estimated to take approximately 12 months, from the summer of 2022 to summer of 2023. No soil import or export would be required because the site is anticipated to balance. The types and numbers of construction equipment expected to be used during construction activities are summarized in Section 3.3, *Air Quality*. All construction staging activities and areas would stay within the confines of the Project Site. Based on the proposed construction timeline, it is anticipated that the Project would be operational by early summer 2023.

1.4.11 City Action Requested

1.4.11.1 DISCRETIONARY ACTIONS AND APPROVALS

Under CEQA Guidelines Section 15357, a discretionary action means a project that calls for an exercise of judgment or deliberation when the public agency (for the Project, the public agency is the City of Colton) decides to approve or disapprove a particular activity, as distinguished from situations where the public agency or body merely has to determine whether there has been conformity with applicable statutes, ordinances, regulations, or other fixed standards. Colton is the lead agency under CEQA and has the principal approval authority over the Project. Following is a list of the discretionary actions and approvals required for Project implementation.

- Adoption of a Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program.
- Approval of a Conditional Use Permit for the proposed RV servicing and repair.
- Approval of Architectural/Site Plan Review for the construction of a new 25,287-square-foot commercial building.
- Approval of a Lot Merger to combine the two existing parcels into one legal parcel.

Additionally, City review of the Project would produce a comprehensive set of draft conditions of approval that would be available for public review prior to consideration of the Project for approval by the City's decision-making body. If approved, the Project would be required to comply with all imposed conditions of approval.

1.4.11.2 NONDISCRETIONARY/MINISTERIAL ACTIONS AND APPROVALS

Under CEQA Guidelines Section 15369, non-discretionary or ministerial actions or approvals are those that involve little or no discretion (e.g., connections to utility infrastructure), merely apply a checklist or clear requirements to the facts as presented and are often issued over the counter by a county or city staff. These actions or approval are ones that require only conformance with a fixed standard or objective measurement and requires little or no personal judgment by a government agency as to the wisdom or manner of carrying out the action. Generally, non-discretionary or ministerial permits require a public official to determine only that the project conforms with applicable zoning and building code requirements and that applicable fees have been paid. Following is a list of the nondiscretionary/ministerial actions and approvals required for Project implementation.

- Approval and issuance of grading and building permits.
- Approvals for water, sewer, and storm drain infrastructure improvements in the public right-of-way.
- Approval of any roadway improvements and closures that may be needed to implement the improvements.
- Approval and issuance of certificates of occupancy.

1.5 INCORPORATION BY REFERENCE

- **Colton General Plan.** The Colton General Plan is a policy document designed to give long-range guidance and direction for decisions affecting the future character of the city. It represents the blueprint and official statement of the city's physical development as well as its economic, social, and environmental goals. The Colton General Plan was used throughout this Initial Study as the fundamental planning document governing development on the Project Site.
- **Colton Zoning Ordinance.** The Colton Zoning Ordinance (Chapter 18 of the Colton Municipal Code) is the regulating tool that the City uses to implement the Colton General Plan; it establishes the basic regulations under which land in the city is developed and utilized. This includes but is not limited to regulations and controls for the design and improvement of development sites, allowable uses, building setback and height requirements, and other development standards. The basic intent of the ordinance is to promote and protect the public health, safety, convenience, and welfare of present and future citizens of Colton. The Colton Zoning Ordinance was used throughout this Initial Study as the fundamental regulatory document governing development on the Project Site.

2. Environmental Checklist

2.1 PROJECT INFORMATION

1. **Project Title:** Giant RV Facility

2. **Lead Agency Name and Address:**
   City of Colton
   Development Services Department, Planning Division
   650 N La Cadena Drive
   Colton, California 92324

3. **Contact Person and Phone Number:**
   David Alvarez, Senior Planner
   909.370.5596

4. **Project Location:** The Project Site, which has an address of 1301 E Santo Antonio Drive, consists of two mostly undeveloped parcels (Assessor's Parcel Numbers 0276-144-030 and -031) on the north side of E Santo Antonio Drive, east of S Mt Vernon Avenue and south of the Reche Canyon Channel

5. **Project Sponsor's Name and Address:**
   Giant Inland Empire RV Center, Inc.
   1020 S. Mt Vernon Avenue
   Colton, CA 91766

6. **General Plan Designation:** General Commercial

7. **Zoning:** General Commercial (C-2) with Business District Sign Overlay

8. **Description of Project:** The Project involves construction and operation of a Giant RV facility, which includes construction of a 25,287-square-foot commercial building for recreational vehicle (RV) preparation and repair. The facility would operate as a "white-glove service" facility with no RV sales. Other site improvements include RV parking and circulation; display and wash areas; surface parking areas, driveways and drive aisles; utility and infrastructure improvements; tenant signage; and various hardscape, landscape, and lighting improvements. Refer to Section 1.4, *Project Description*, for a more detailed description of the Project.

2. Environmental Checklist

9. **Surrounding Land Uses and Setting:** The Project Site is bounded by the Reche Canyon Channel to the north, with commercial and office uses beyond; E Santo Antonio Drive to the south, with commercial and retail uses beyond; Center Point Apartments to the east; and S Mt Vernon Avenue to the west, with office and residential uses beyond.

10. **Other Public Agencies Whose Approval Is Required (e.g., permits, financing approval, or participating agreement):** Not applicable.

2.2 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.

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

2.3 DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier 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.

Signature — *Date* 9/20/2022

2.4 EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors, as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

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

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

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.

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

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

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

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

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

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

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

9. The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X	
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				X

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		X		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?		X		

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Disturb any human remains, including those interred outside of dedicated cemeteries?			X	
VI. ENERGY. Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				X
VII. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	
VIII. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				X
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in a substantial erosion or siltation on- or off-site;			X	
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			X	
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			X	
iv) impede or redirect flood flows?				X
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				X
XII. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?				X
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X
XIII. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b) Generation of excessive groundborne vibration or groundborne noise levels?		X		
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X
XIV. POPULATION AND HOUSING. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X
XV. PUBLIC SERVICES. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?			X	
Police protection?			X	
Schools?			X	
Parks?				X
Other public facilities?				X

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X
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?				X
XVII. TRANSPORTATION. Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			X	
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
d) Result in inadequate emergency access?				X
XVIII. TRIBAL CULTURAL RESOURCES.				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or				X
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Result in a determination by the waste water 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?			X	
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				X
XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				X
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				X
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?				X
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				X
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.				
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?		X		
b) Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?			X	
c) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)			X	
d) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

2. Environmental Checklist

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3. Environmental Analysis

Section 2.4 provided a checklist of environmental impacts. This section provides an evaluation of the impact categories and questions contained in the checklist and identifies mitigation measures, if applicable.

3.1 AESTHETICS

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

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

Less Than Significant Impact. For purposes of determining significance under CEQA, a scenic vista is generally considered a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. Some scenic vistas are officially designated by public agencies, or informally designated by tourist guides. Vistas provide visual access or panoramic views to a large geographic area and are generally located at a point where surrounding views are greater than one mile away. Panoramic views are usually associated with vantage points over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views might include an urban skyline, valley, mountain range, a large open space area, the ocean, or other water bodies. A substantial adverse effect to a scenic vista is one that degrades the view from such a designated view spot.

The Colton General Plan's Open Space and Conservation Element (1987) identifies mountains surrounding Colton as scenic vistas, including the San Gabriel Mountains to the north and northwest. The foothills of the San Gabriel Mountains are over nine miles north of the Project Site. Because of their proximity and substantial height (up to 11,500 feet above mean sea level), views of these mountains are prominent from many vantage points in the city. Views are most prominent from certain roadways and in certain locations from places of work and residences.

The Colton General Plan does not designate any scenic vistas or corridors on or near the Project Site, but the San Gabriel Mountains can be seen to the north. Specifically, views of the San Gabriel Mountains are afforded to motorists and passersby traveling north along S Mt Vernon Avenue, which forms the western site boundary, as well as to motorists and passersby traveling east-west along E Santo Antonio Drive, which forms the southern site boundary.

Views of the San Gabriel Mountains afforded to motorists and passersby traveling east-west along E Santo Antonio Drive would be partially obstructed by the Project's proposed building. However, the obstructed view window would only occur along the central portion of the Project Site (approximately 230 linear feet of E Santo Antonio Drive street frontage), which is where the building is proposed to be located. Additionally, due to the height and massing of the mountains, views of these scenic features would continue to be provided to motorists and passersby traveling along E Santo Antonio Drive. Also, under existing conditions, views of the San Gabriel Mountains are already partially obstructed due to intervening development and

landscaping, topography, and atmospheric haze that is common in the Inland Empire throughout the year. Furthermore, the Colton General Plan does not designate any scenic vistas or protected viewsheds along E Santo Antonio Drive. Therefore, Project development would not result in a substantial adverse effect on a scenic vista of these mountains.

Additionally, Project development would not affect views of San Gabriel Mountains as seen from northbound S Mt Vernon Avenue. The Project would not introduce visual obstructions that would affect motorists and passersby traveling on this roadway, as the Project Site is on the east side of S Mt Vernon Avenue and views of the mountains from this roadway are to the north. Therefore, Project development would not result in a substantial adverse effect on a scenic vista of these mountains.

Based on the preceding, impacts would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. Scenic highways are a unique component of the regions circulation system as they traverse areas of scenic or aesthetic value. Per Caltrans, a highway may be designated as scenic depending on how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view (Caltrans 2022a).

The Project Site is in an urbanized of the city and is not on or near a state-designated or -eligible scenic highway, as designated on the California State Scenic Highway System Map of the California Department of Transportation (Caltrans 2022b). In fact, no highways within the city are eligible or officially designated state scenic highways. Additionally, the Project Site is not visible from the nearest state-eligible scenic highway (State Route 330), which is almost 14 miles to the northeast at the base of the San Gabriel Mountains. Furthermore, there are no rock outcroppings or historic buildings onsite—the Project Site is vacant and void of any buildings and structures or scenic features. Therefore, no impact would occur and no mitigation measures are necessary.

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

Less Than Significant Impact. The assessment of aesthetic impacts is subjective by nature. Aesthetics generally refers to the identification of visual resources and their quality, as well as an overall visual perception of the environment. A project is generally considered to have a significant aesthetic impact if it substantially changes the character or quality of the Project Site such that the site becomes visually incompatible with or visually unexpected in its surroundings.

The Project Site is in an urbanized area of Colton that is characterized by flat topography and urban development. Existing land use and conditions of the Project Site and surrounding area are depicted in

Figure 3, *Aerial Photograph*. As shown in Figure 3, the Project Site is undeveloped land that is heavily disturbed (annually disked). The site consists mainly of bare or exposed soil. Surrounding land uses consist of a mix of commercial, retail, office and residential uses.

Following is a discussion of the potential impact to the visual character or quality of the Project Site and its surrounding resulting from the construction and operational phases of the Project.

Project Construction Phase

Project implementation would result in construction activities that would temporarily change the visual character of the Project Site and its surroundings. Construction activities would involve site clearing, grading, building, and site improvements. Construction staging areas, including earth stockpiling, storage of equipment and supplies, and related activities would contribute to a generally "disturbed site," which may be perceived by some as a visual impact.

However, these effects would be typical of any site in the city that undergoes development or redevelopment. Project development is anticipated to be completed in three phases—clearing, grading, and construction. Overall construction is estimated to take approximately 12 months, extending from the summer of 2022 to the summer of 2023. Construction activities may be unsightly during the site preparation and construction phases; however, they would be temporary and would cease upon completion. Also, construction fencing would be erected to help shield the construction areas and would also be temporary. Specifically, the typical fencing to be provided (i.e., chain-link fencing with mesh fabric or similar screening material) would screen offsite views of the construction site, including the screening of stockpiles, graded areas, construction equipment, and building materials.

Therefore, Project-related construction activities would not have a significant effect on the existing visual character or quality of the site and its surroundings. Impacts would be less than significant and no mitigation measures are necessary.

Project Operation Phase

The project applicant is proposing to develop the Project Site with a Giant RV facility. Other Project components include vehicular access and circulation improvements; concrete paving, surface parking and utility improvements; security fending and lighting; and various hardscape and landscape improvements. Figure 4, *Conceptual Site Plan*, illustrates the overall design of the Project Site under the Project. As illustrated in Figure 4, the building would be placed in the center of the Project Site with the building facing west towards Citrus Avenue and the entry facing south to E Santo Antonio Drive. The building has been oriented to take advantage of the high visibility offered from Mt. Vermont Avenue, to display the RV's. Its placement also provides a visual and physical buffer for residential uses directly East.

Figures 5a and 5b, *Conceptual Building Elevations*, and Figures 6a and 6b, *Conceptual Building Renderings*, illustrate the conceptual elevations and architectural design and features of the proposed buildings. As shown in these figures, the buildings would incorporate a contemporary architectural style and aesthetic design, which express the buildings proposed use. The massing of the building is broken up by the building features, such

as the large canopies on the western and eastern ends of the building and roll-up doors for the service bays on the northern and southern ends of the building. The building features and materials would be added to offset the building's massing and provide relief to and variation in the building form and style.

The design elements/features of the proposed building would be complimentary to and not detract from those of the existing commercial, retail and residential uses surrounding the Project Site. The Project includes a single-story building with high ceilings (up to 34 feet 10 inches), which would be comparable to the surrounding existing uses. While the Project establishes its own character, particularly with regard to architectural style and aesthetic design, its integration into the project area is evidenced through compatible colors and quality design. The design is also unique due to its identity and expresses its uniqueness through its contemporary style. The mixture of colors, textures, and materials of the buildings would also help balance the intended permanence of the building with the scale of the surround buildings and uses. Also, the proposed building (including building massing and height), although newer than the buildings of the surrounding uses, would be similar in height to those of the surrounding uses and would not detract from the visual character of the surrounding uses.

As shown in Figure 4, the Project's landscape plan would feature new landscaping along the entire site perimeter. The site landscaping would include a variety of ornamental trees, shrubs, and groundcover that would help soften the massing of the buildings and various hardscape improvements (e.g., parking areas, drive aisles) and help provide visual relief for the Project. The landscaping would help soften the visual character of the Project's building and hardscape improvements.

Additionally, project implementation would provide similar and compatible uses to the existing commercial uses, to the north and west; and retail uses south of the Project Site. As proposed, the proposed RV facility would be permitted on the Project Site via City approval a conditional use permit. With the discretionary approval, the Project would not only be permitted but would be considered a compatible use and fits well with the surrounding uses.

Overall, Project development would enhance and strengthen the visual character of the Project Site and its surroundings through new architecture, landscaping, hardscape, and other improvements onsite and along the Project Site's street frontages. The proposed architectural and landscape elements and design would ensure that development of the Project is not detrimental to the visual character or quality of the surrounding area or uses. The building masses, landscaping, and various hardscape and landscape improvements proposed throughout the Project Site would be designed to create a sense of cohesiveness on- and offsite and along the Project Site boundaries. Although newer than that of the surrounding area and uses, the proposed buildings, landscaping and site improvements would complement and not detract from the visual character of the site or surrounding area.

Based on the preceding, Project development would not degrade the visual character or quality of the site and its surroundings. Therefore, impacts would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. Lighting effects are associated with the use of artificial light during the evening hours. There are two primary sources of light: light emanating from building interiors passing through windows and openings, and light from exterior sources (i.e., street lighting, architectural building illumination, security lighting, parking lot lighting, landscape lighting, and signage). Excessive light and/or glare can impair vision, cause a nuisance, affect sleep patterns, and generate safety hazards when experienced by drivers. Uses such as residences, elderly care facilities, schools, and hotels are considered light sensitive, since occupants have expectations of privacy during evening hours and may be subject to disturbance by bright light sources. Light spill or trespass are considered a nuisance and are typically defined as the presence of unwanted light on properties adjacent to the property being illuminated. With respect to lighting, the degree of illumination may vary widely depending on the amount of light generated, height of the light source, presence of barriers or obstructions, type of light source, and weather conditions.

Glare is primarily a daytime occurrence caused by the reflection of sunlight or artificial light on surfaces of buildings or objects, including highly polished surfaces such as glass windows or reflective materials and, to a lesser degree, from broad expanses of light-colored surfaces. Perceived glare is the unwanted and potentially objectionable sensation experienced by a person as they look directly into the light source of a luminaire. Daytime glare generation is common in urban areas and is typically associated with buildings with exterior façades largely or entirely composed of highly reflective glass. Daytime glare can also be generated by light reflecting off passing or parked cars. Glare can also be produced during evening and nighttime hours by the reflection of artificial light sources such as automobile headlights. Glare generation is typically related to either moving vehicles or sun angles, although glare resulting from reflected sunlight can occur regularly at certain times of the day and year. Excessive glare not only impedes visibility, but also increases the ambient heat reflectivity in a given area. Glare-sensitive uses include residences, hotels, transportation corridors, and aircraft landing corridors.

As shown in Figure 3, *Aerial Photograph*, the undeveloped Project Site is in an urbanized area of the city and is surrounded by a mix of commercial, retail, office and residential uses. No sources of light or glare exist on the Project Site; however, there are numerous sources of light and glare surrounding the Project Site. The only light- or glare-sensitive uses near the Project Site are the residents of the adjacent apartment complex to the east.

Following is a discussion of the potential day- and nighttime light and glare impacts in the project area resulting from the construction and operational phases of the Project.

Project Construction Phase

Project construction would be limited to daytime hours and nighttime lighting would not be required until the Project is operational. Therefore, no short-term construction-related impacts associated with light and glare would occur. Impacts would be less than significant and no mitigation measures are necessary.

3. Environmental Analysis

Project Operation Phase

Daytime Glare

The Project includes building materials and architectural treatments that could cause daytime glare, but not to such an extent that they would result in a significant impact. For example, the architectural treatments of the proposed buildings would include building materials such as plastered walls, glazing (glass windows and doors), and other decorative elements (see building elevations and renderings in Figures 5a and 5b, *Conceptual Building Elevations*, and Figures 6a and 6b, *Conceptual Building Renderings*). With the exception of the glass windows and doors, the building materials and architectural treatments are non-reflective and would therefore not create substantial day or nighttime glare. As illustrated in Figures 5a through 6b, compared to the amount of non-reflective building materials, the use of glazing is limited (would make up less than five percent of the building façades).

The proposed glazing could increase sources of glare because it would reflect some level of sunlight during certain times of the day. Also, vehicles parked onsite would increase the potential for reflected sunlight during certain times of the day. However, glare from these sources is typical of the surrounding area and would not increase beyond what is expected for a developing rural area of the city.

Therefore, daytime glare impacts from Project-related architectural treatments and building materials would be less than significant and no mitigation measures are necessary.

Nighttime Lighting and Glare

Under existing conditions, the Project Site is undeveloped and void of any sources of artificial lighting. Project development would introduce new sources of artificial light to the Project Site and surrounding area. Nighttime site lighting would consist of exterior building-mounted light fixtures; interior lighting for the new building; lighting for pedestrian walkways and common gathering areas; ground-mounted decorative lighting for landscape and architectural features; lighting for the new parking areas and RV display areas; and security lighting. These new sources artificial lighting have the potential to increase nighttime light and glare in the project area, as well as create offsite light spill or trespass that could result in a nuisance. Nighttime lighting and glare from the Project Site would be visible from the surrounding roadways and residential and nonresidential land uses.

Although Project development would introduce new light sources to the Project Site and surrounding area, the proposed light sources would be similar to the light sources of the surrounding commercial, retail, and office uses. Existing nighttime lighting also emanates from streetlights along S Mt Vernon Avenue and E Santo Antonio Drive. Considering the existing sources of lighting in the surrounding vicinity, the amount and intensity of nighttime lighting proposed onsite would not be substantially greater than existing lighting. It is unlikely that conventional lighting and illuminated operations under the Project would discernibly, much less adversely, affect ambient light conditions.

Furthermore, Project development would be required to conform with all applicable City lighting standards, including those of Sections 18.40.040 (Control of Artificial Illumination) and 18.42.090 (Light) of the Colton Zoning Ordinance. The lighting provisions of these sections are intended to prevent glare, light trespass, and

light pollution. All proposed exterior lighting would be designed, arranged, installed, directed, shielded, operated, and maintained in such a manner as to contain direct illumination onsite and prevent light and glare impacts offsite in accordance with the provisions of the Colton Zoning Ordinance, thereby, preventing excess illumination and light spillover onto adjoining/surrounding residential and nonresidential land uses and/or roadways. Through the City's established development review processes, the City would ensure that final design of the Project complies with the requirements of the Colton Zoning Ordinance and thus precludes or effectively minimizes potential light/glare overspill onto adjacent/surrounding properties or roadways.

Finally, Project development would be required to comply with California's Building Energy Efficiency Standards for Residential and Nonresidential Buildings, Title 24, Part 6, of the California Code of Regulations, which outlines mandatory provisions for lighting control devices and luminaires. For example, the Project's exterior lighting sources would be required to be installed in accordance with the provisions of Section 110.9 (Mandatory Requirements for Lighting Control Devices and Systems, Ballasts, and Luminaires).

Compliance with the lighting provisions of the Colton Zoning Ordinance and Title 24 would ensure that the Project does not result in significant light impacts. Compliance with these provisions is ensured through the City's development review and building plan check process.

Based on the preceding, operational nighttime light and glare impacts related to the Project would be less than significant and no mitigation measures are necessary.

3.2 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

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

No Impact. The Project Site is not mapped as farmland. According to the California Department of Conservation Important Farmland Map, the Project Site is designated as "Other Land", which is classified as vacant and nonagricultural land surrounded on all sides by urban development and usually greater than 40 acres (CDC 2016a). There are also no areas designated as farmland abutting or within proximity of the Project Site. Therefore, Project development would not convert mapped farmland to nonagricultural use. No impact would occur and no mitigation measures are necessary.

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

No Impact. The Project Site is not zoned for agricultural use—the site is zoned General Commercial (C-2), which does not permit agricultural uses. In fact, Colton has no agriculturally-zoned parcels. The Project Site is also in a developed area of the city—the site does not contain active farmland or other agricultural uses and is not adjacent to or in proximity of such uses. Further, the Project Site is not subject to a Williamson Act contract (CDC 2018). Therefore, Project implementation would not conflict with zoning for agricultural uses or a Williamson Act contract. Accordingly, no impact would occur and no mitigation measures are necessary.

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

No Impact. Forest land is defined 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" (California Public Resources Code § 12220[g]). Timberland is defined as "land…which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees" (California Public Resources Code § 4526).

As shown in Figure 3, *Aerial Photograph*, the Project Site is undeveloped land that is heavily disturbed and devoid of vegetation. The site consists mainly of bare or exposed soil. Therefore, the Project Site does not meet the definition of lands designated as forestland or timberland as defined by PRC Sections 12220(g), 4526, and 51104(g). Additionally, the only area in the city qualifying as a timberland resource is the Christmas tree farm in Reche Canyon, which is approximately 1.4 miles southeast of the Project Site (Colton 2013). Furthermore, the Project Site is not designated or zoned for forest or timber land or used for forestry. As stated above, the site is zoned General Commercial (C-2). Therefore, no impact would occur and no mitigation measures are necessary.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. See response to Section 3.2.c, above. As substantiated in this section, no impact would occur and no mitigation measures are necessary.

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?

No Impact. See responses to Section's 3.2.a, b, and c, above. As substantiated in these sections, no impact would occur and no mitigation measures are necessary.

3.3 AIR QUALITY

This section addresses the impacts of the Project on ambient air quality and the exposure of people, especially sensitive individuals, to unhealthful pollutant concentrations. A background discussion on the air quality regulatory setting, meteorological conditions, existing ambient air quality in the vicinity of the Project Site, and air quality modeling can be found in Appendix A.

The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O_3), carbon monoxide (CO), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), and lead (Pb). Areas are classified under the federal and California Clean Air Act as either in attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by the South Coast Air Quality Management District (South Coast AQMD), is designated nonattainment for O_3, and $PM_{2.5}$ under the California and National AAQS[1], nonattainment for NO_2 along State Route 60 under the California AAQS[2], nonattainment for PM_{10} under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS (CARB 2022a).

Furthermore, the South Coast AQMD has identified regional thresholds of significance for criteria pollutant emissions and criteria air pollutant precursors, including VOC, CO, NO_x, SO_x, PM_{10}, and $PM_{2.5}$. Development projects below the regional significance thresholds are not expected to generate sufficient criteria pollutant emissions to violate any air quality standard or contribute substantially to an existing or projected air quality violation. Where available, the significance criteria established by the South Coast AQMD may be relied upon to make the following determinations.

Would the project:

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

Less Than Significant Impact. The South Coast AQMD adopted the 2016 Air Quality Management Plan (AQMP) on March 3, 2017. Regional growth projections are used by South Coast AQMD to forecast future emission levels in the SoCAB. For southern California, these regional growth projections are provided by the Southern California Association of Governments (SCAG) and are partially based on land use designations included in city/county general plans. Typically, only large, regionally significant projects have the potential to affect the regional growth projections.

[1] The SoCAB is pending a resignation request from nonattainment to attainment for the 24-hour federal $PM_{2.5}$ standards. The 2021 $PM_{2.5}$ Redesignation Request and Maintenance Plan demonstrates that the South Coast meets the requirements of the CAA to allow US EPA to redesignate the SoCAB to attainment for the 65 $\mu g/m^3$ and 35 $\mu g/m^3$ 24-hour PM2.5 standards. CARB will submit the 2021 $PM_{2.5}$ Redesignation Request to the US EPA as a revision to the California SIP (CARB 2021).

[2] On February 21, 2019, CARB's Board approved the separation of the area that runs along State Route 60 corridor through portions of Riverside, San Bernardino, and Los Angeles counties from the remainder of the SoCAB for State nonattainment designation purposes. The Board designated this corridor as nonattainment. The remainder of the SoCAB remains in attainment for NO_2 (CARB 2019a). CARB is proposing to redesignate SR-60 Near-Road Portion of San Bernardino, Riverside, and Los Angeles Counties in the SoCAB as attainment for NO_2 at the February 24, 2022 Board Hearing (CARB 2022b).

Changes in population, housing, or employment growth projections have the potential to affect SCAG's demographic projections and therefore the assumptions in South Coast AQMD's AQMP. Based on the scope and nature of the Project, it is anticipated to generate substantially less than 1,000 jobs and would develop substantially less than 500,000 square feet of business floor space. Thus, it would not meet the criteria for a project of statewide, regional, or areawide significance established under CEQA Guidelines Section 15206(b)(2). Additionally, as demonstrated below in Section 3.3.b, the regional emissions that would be generated by the operational phase of the Project would be less than the South Coast AQMD emissions thresholds; and would therefore, not be considered by South Coast AQMD to be a substantial source of air pollutant emissions that would have the potential to affect the attainment designations in the SoCAB. Therefore, the Project would not affect the regional emissions inventory or conflict with strategies in the AQMP. Impacts would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. The following describes Project-related impacts from regional short-term construction activities and regional long-term operation Project.

Regional Short-Term Construction Impacts

Project-related construction activities would result in the generation of criteria air pollutants. These emissions would primarily be 1) exhaust from off-road diesel-powered construction equipment; 2) dust generated by construction activities; 3) exhaust from on-road vehicles; and 4) off-gassing of volatile organic compounds (VOCs) from paints and asphalt.

The Project's construction activities are anticipated to disturb the entire Project Site. The Project would involve site preparation, rough grading, building construction, utilities trenching, fine grading, paving, architectural coating, and finishing and landscaping. Construction is anticipated to start in summer 2022 and finish in summer 2023. Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod), Version 2020.4, and are based on the preliminary construction duration and equipment mix provided by the project applicant. Construction emissions modeling are shown in Table 1. As shown in the table, maximum daily emissions for VOC, NO_x, CO, SO_2, PM_{10}, and $PM_{2.5}$ from construction-related activities would be less than their respective South Coast AQMD regional significance threshold values. Therefore, impacts would be less than significant and no mitigation measures are necessary.

Table 1 Maximum Daily Regional Construction Emissions

Construction Phase	Pollutants (lb/day)[1, 2]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Year 2022						
Site Preparation	3	34	21	<1	10	6
Site Preparation and Rough Grading	4	41	26	<1	11	6
Site Preparation, Rough Grading, and Building Construction 2022	6	55	41	<1	13	7
Building Construction 2022	2	18	21	<1	2	1
Building Construction 2022 and Utility Trenching 2022	2	20	25	<1	2	1
Year 2023						
Building Construction 2023 and Utility Trenching 2023	2	18	24	<1	2	1
Building Construction 2023	2	16	21	<1	2	1
Building Construction 2023, Fine Grading, Paving, and Architectural Coating	6	42	47	<1	7	4
Building Construction 2023, Fine Grading, Paving, Architectural Coating, and Finishing/Landscaping	6	43	50	<1	7	4
Maximum Daily Construction Emissions						
Maximum Daily Emissions	6	55	50	<1	13	7
South Coast AQMD Regional Construction Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Significant?	No	No	No	No	No	No

Source: CalEEMod Version 2020.4.

[1] Based on the preliminary information provided by the project applicant. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by South Coast AQMD of construction equipment.

[2] Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186–compliant sweepers.

Long-Term Operation-Related Air Quality Impact

Typical long-term air pollutant emissions are generated by area sources (e.g., landscape fuel use, aerosols, architectural coatings, and asphalt pavement), energy use (natural gas), and mobile sources (i.e., on-road vehicles). The Project would involves development of an RV preparation and repair business. The proposed building would, at minimum, be designed and built to meet the 2019 Building Energy Efficiency Standards and CALGreen. As shown in Table 2, it is anticipated that Project operation would result in overall minimal emissions and would not exceed the South Coast AQMD regional operation-phase significance thresholds. Therefore, impacts would be less than significant and no mitigation measures are necessary.

Table 2 Maximum Daily Regional Operation Emissions

Source	Maximum Daily Emissions (lbs/Day)					
	VOC	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Area	1	<1	<1	<1	<1	<1
RV Coating	1	<1	<1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile	<1	1	3	<1	1	<1
Offroad	<1	2	2	<1	<1	<1
Total	**2**	**3**	**6**	**<1**	**1**	**<1**
South Coast AQMD Regional Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Threshold?	No	No	No	No	No	No

Source: CalEEMod Version 2020.4.
Notes: lbs = pounds. Highest winter or summer emissions are reported.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Project development could expose sensitive receptors to elevated pollutant concentrations if it causes or significantly contributes to elevated pollutant concentration levels. Unlike regional emissions, localized emissions are typically evaluated in terms of air concentration rather than mass so they can be more readily correlated to potential health effects.

Construction LSTs

Localized significance thresholds (LSTs) are based on the California AAQS, which are the most stringent AAQS to provide a margin of safety in the protection of public health and welfare. They are designated to protect sensitive receptors most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and people engaged in strenuous work or exercise. The screening-level construction LSTs are based on the size of the Project Site, distance to the nearest sensitive receptor, and Source Receptor Area (SRA). The nearest offsite sensitive receptors are the multifamily residences along E Santo Antonio Drive east of the Project Site (see Figure 3, *Aerial Photograph*).

Air pollutant emissions generated by Project-related construction activities would cause temporary increases in air pollutant concentrations. Table 3 demonstrates that the maximum daily construction emissions (pounds per day) for NO_x, CO, PM_{10}, and $PM_{2.5}$ would be less than their respective South Coast AQMD screening-level LSTs. Therefore, air quality impacts from Project-related construction activities would be less than significant and no mitigation measures are necessary.

Table 3 Localized Construction Emissions

Construction Activity	Pollutants(lbs/day)[1]			
	NO_X	CO	PM_{10}[2]	$PM_{2.5}$[2]
South Coast AQMD 1.31 Acre LST	**134**	**762**	**4.93**	**3.31**
Building Construction 2022	16	16	0.81	0.76
Building Construction 2022 and Utility Trenching 2022	17	20	0.90	0.84
Building Construction 2023 and Utility Trenching 2023	16	20	0.78	0.73
Building Construction 2023	14	16	0.70	0.66
Exceeds LST?	No	No	No	No
South Coast AQMD 2.31-Acre LSTs	**180**	**1,052**	**7.72**	**4.42**
Building Construction 2023, Fine Grading, Paving, and Architectural Coating	39	41	4.86	3.17
Building Construction 2023, Fine Grading, Paving, Architectural Coating, and Finishing/Landscaping	41	44	4.93	3.24
Exceeds LST?	No	No	No	No
South Coast AQMD 3.50-Acre LSTs	**220**	**1,359**	**10.49**	**6.00**
Site Preparation	33	20	10.02	5.80
Exceeds LST?	No	No	No	No
South Coast AQMD 4.00-Acre LSTs	**237**	**1,488**	**11.66**	**6.67**
Site Preparation and Rough Grading	40	25	10.50	6.06
Site Preparation, Rough Grading, and Building Construction 2022	51	35	11.07	6.60
Exceeds LST?	No	No	No	No

Source: CalEEMod Version 2020.4. South Coast AQMD 2008 and 2011.

Notes: In accordance with South Coast AQMD methodology, only onsite stationary sources and mobile equipment are included in the analysis. Screening level LSTs are based on sensitive receptors within 82 feet (25 meters) in SRA 34.

1 Where specific information for project-related construction activities or processes was not available modeling was based on CalEEMod defaults. These defaults are based on construction surveys conducted by the South Coast AQMD.

2 Includes fugitive dust control measures required by South Coast AQMD under Rule 403, such as watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186–compliant sweepers.

Construction Health Risk

Emissions from construction equipment primarily consist of diesel particulate matter (DPM). In 2015, the Office of Environmental Health Hazards Assessment (OEHHA) adopted guidance for preparation of health risk assessments, which included the development of a cancer risk factor and non-cancer chronic reference exposure level for DPM over a 30-year time frame (OEHHA 2015). Currently, South Coast AQMD does not require the evaluation of long-term excess cancer risk or chronic health impacts for a short-term project. The Project is anticipated to be completed in approximately 12 months, which would limit the exposure to offsite receptors. Furthermore, construction activities would not generate onsite exhaust emissions that would exceed the screening-level construction LSTs, as demonstrated in Table 3, *Localized Construction Emissions*. Therefore, construction emissions would not pose a health risk to onsite and offsite receptors. Project-related construction health impacts would be less than significant and no mitigation measures are necessary.

3. Environmental Analysis

Operation LSTs

Land uses that have the potential to generate substantial stationary sources of emissions require a permit from South Coast AQMD, such as chemical processing or warehousing operations where substantial truck idling could occur on-site. The Project would not operate as a warehouse, and it is not anticipated that its operations would result in substantial on-site truck idling. In addition, Project implementation is assumed to use one air compressor for operation of the paint booth, which would be used for minor touch-up painting/repairs only on an as-need basis. In addition, operation of the paint booth would be required to apply for the Title V permit, which would require compliance with South Coast AQMD Rule 1132 to control VOC emissions from high-emitting spray booth facilities. Also, the Project would be subject to the requirements of Rule 1151 and Rule 1171. The anticipated limited use of the spray booth and compliance with South Coast AQMD rules would minimize onsite criteria air pollutant emissions generated from the paint spray booth.

Furthermore, Project operation would result in the use of standard onsite mechanical equipment such as heating, ventilation, and air conditioning units in addition to occasional use of landscaping equipment for property maintenance, which would generate area source emissions. However, these sources typically do not generate substantial amounts of onsite criteria air pollutant emissions. As shown previously in Table 2, *Maximum Daily Regional Operation Emissions*, emissions from these sources would be nominal. Emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ generated at the Project Site (offsite mobile-source emissions are not included in the LST analysis) from onsite area sources and off-road equipment would not expose sensitive receptors to substantial concentrations of criteria air pollutants.

Therefore, the Project would not generate a substantial amount of onsite criteria air pollutant emissions and Project operation would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant and no mitigation measures are necessary.

Operation Health Risk

People exposed to toxic air contaminants (TACs) at sufficient concentrations and durations may have an increased chance of getting cancer or experiencing other serious health effects. These health effects can include damage to the immune system, as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory, and other health problems (USEPA 2022). Long-term (chronic) inhalation of diesel particulate matter (DPM) is likely a lung cancer risk. Short-term (i.e., acute) exposure can cause irritation and may exacerbate existing allergies and asthma (USEPA 2002). To reduce exposure to TACs, CARB developed a handbook for the siting of sensitive land uses in the vicinity of freeways, distribution centers, rail yards, ports, refineries, chrome-plating facilities, dry cleaners, and gasoline-dispensing facilities (CARB 2005). This document was developed as a guide and as a tool for assessing the compatibility and associated health risk when placing sensitive receptors near existing pollution sources.

CARB's recommendations on the siting of new sensitive land uses were developed from a compilation of recent studies that evaluated data on the adverse health effects from proximity to air pollution sources. The key observation in these studies is that close proximity to air pollution sources substantially increases both exposure and the potential for adverse health effects relative to the existing background concentrations found

within the air basin. Three carcinogenic TACs constitute the majority of the known health risks from motor vehicle traffic—DPM from trucks and benzene and 1,3-butadiene from passenger vehicles. Diesel PM represents approximately 70 percent of the potential health risk from air toxics. The association of truck-related emissions with adverse health effects is generally strongest between 300 and 1,000 feet and diminishes with distance. The impact of traffic emissions is on a gradient that at some point becomes indistinguishable from the regional air pollution problem. Typical uses that could generate a substantial number of trucks would be distribution centers. CARB recommends avoiding siting new sensitive land uses within "1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating TRUs per day, or where TRU unit operations exceed 300 hours per week)" to avoid exposing sensitive receptors to substantial concentration of air pollutants (CARB 2005).

The Project is anticipated to generate up to a total of 40 truck trips to deliver up to 10 RVs per day, which would be less than the 100 trucks per day and 40 TRUs per day that would warrant a more detailed review (CARB 2005). Additionally, the trucks used to transport the RVs to the Project Site are subject to CARB's In-Use Airborne Toxic Control Measure (ATCM) Rule. The ATCM prohibits drivers of diesel-fueled commercial motor vehicles from idling the vehicles' primary diesel engines for more than five minutes at any location, or idle the diesel-fueled auxiliary powered system for more than five minutes to power a heater, air conditioner, or any ancillary equipment on the vehicle if the vehicle is equipped with a sleeper berth and is located within 100 feet of a restricted area, defined as homes and schools. Idling necessary for health, safety, or operational concerns is exempt from these restrictions. In consideration of the anticipated number of diesel-fueled trucks not exceeding CARBs siting criteria in addition to compliance with CARB Rule 2485, idling emissions from trucks associated with the Project would not expose sensitive receptors to substantial pollutant concentrations.

In addition, operation of the paint booth would be required to apply for the Title V permit, which would require compliance with South Coast AQMD Rule 1132 to control VOC emissions from high-emitting spray booth facilities. Furthermore, the Project would be subject to the requirements of Rule 1151 and Rule 1171. The anticipated limited use of the paint booth and compliance with South Coast AQMD rules would minimize onsite toxic air contaminant emissions generated from the paint spray booth.

Therefore, the Project would not expose sensitive receptors to substantial concentrations of toxic air contaminants and health risk. Impacts would be less than significant and no mitigation measures are necessary.

Carbon Monoxide Hotspots

Vehicle congestion has the potential to create pockets of CO called hotspots. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles are backed-up and idle for longer periods and are subject to reduced speeds. These pockets could exceed the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9.0 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to ambient air quality standards is typically demonstrated through an analysis of localized CO concentrations.

3. Environmental Analysis

The SoCAB has been designated attainment under both the national and California AAQS for CO. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—in order to generate a significant CO impact (BAAQMD 2017). The Project-related 21 AM and PM peak hour vehicle trips would be minimal compared to the AAQS screening levels. Therefore, the Project would not substantially increase CO hotspots at intersections. Impacts would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. The Project would not result in objectionable odors. The threshold for odor is if a project creates an odor nuisance pursuant to South Coast AQMD Rule 402, Nuisance, which states:

> A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. Emissions from construction equipment, such as diesel exhaust and volatile organic compounds from architectural coatings and paving activities may generate odors. However, these odors would be low in concentration, temporary, and would not affect a substantial number of people. Any odors produced during the installation phase are not expected to be significant or highly objectionable and would be in compliance with South Coast AQMD Rule 402.

Project operations would involve the development of an RV preparation and repair business, which would include painting and body work taking place within the Project Site. However, paint/coating operations would be reserved for touch-ups and repairs and would . These operations also would be conducted in the service areas that would be contained and properly filtered to ensure no odors are produced. In addition, operation of the paint booth would be required to apply for the Title V permit, which would require compliance with South Coast AQMD Rule 1132. Therefore, odor impacts would be less than significant and no mitigation measures are necessary.

3.4 BIOLOGICAL RESOURCES

The analysis in this section is based in part on the following technical study, included as Appendix B to this Initial Study:

- Biological Resources Technical Report, Cadre Environmental, January 2022.

Would the project:

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

No Impact. Project implementation would not have a substantial adverse effect, either directly or through habitat modifications, on any plant or wildlife species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Services (USFWS). No native undisturbed suitable habitat, soils or sensitive plant/wildlife species observations were documented or expected to occur within the Project Site as substantiated in the Biological Resources Technical Report prepared for the Project (Appendix B). As also shown in Figure 3, *Aerial Photograph*, the Project Site is in an urbanized area of the city. The site characterized as heavily disturbed and is surrounded by a mix of commercial, retail, office and residential uses, and high traffic roads to the east, south and west. Therefore, no impact would occur and no mitigation measures are necessary.

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

No Impact. No riparian, sensitive or undisturbed native/natural habitats were documented within or adjacent to the Project Site as substantiated in the Biological Resources Technical Report prepared for the Project (Appendix B). The Project Site is characterized as heavily disturbed (annually disked), no natural undisturbed habitats occur onsite, and it is surrounded by a mix commercial, retail, office and residential uses, and high traffic roads to the east, west and south. Also, the Reche Canyon Channel is immediately north of the Project Site (see Figure 3). However, the channel is annually cleared and unvegetated; it is not identified and does not serve as riparian habitat or other sensitive natural community. Therefore, no impact would occur and no mitigation measures are necessary.

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

No Impact. As substantiated in the Biological Resources Technical Report (Appendix B), no wetlands or jurisdictional resources regulated by the US Army Core of Engineers, CDFW, or Regional Water Quality

Control Board were documented within or immediately adjacent to the Project Site. Additionally, the Reche Canyon Channel immediately north of the Project Site is not a state or federally protected wetland or jurisdictional resource. Further, the single black willow and tamarisk tree located near the northern boundary do not represent a jurisdictional resource. Therefore, no impact would occur and no mitigation measures are necessary.

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?

Less Than Significant Impact With Mitigation Incorporated. The Project Site is heavily disturbed, surrounded by a mix of commercial, retail, office and residential uses and does not represent a wildlife movement corridor or route between open space habitats. Additionally, no direct or indirect impacts to Reche Canyon Channel located north of the Project Site would result from Project implementation. As also noted above, the channel is not identified and does not serve as riparian habitat or other sensitive natural community.

However, although disturbed, the undeveloped Project Site represents potential habitat for common ground nesting bird species such as killdeer, many of which were documented onsite during the biological resources site assessment conducted as a part of the Biological Resources Technical Report prepared for the Project (Appendix B). Project construction could result in direct and/or indirect impacts to nesting birds, including the loss of nests, eggs, and fledglings if ground-disturbing activities occur during the nesting season (generally, September 1st to January 31st). Construction activities during this time may result in reduced reproductive success and may violate the federal Migratory Bird Treaty Act and California Fish and Game Codes 3503 and 3513. If construction (including any ground-disturbing activities) occurs during the nesting season, a nesting bird survey must be conducted by a qualified biologist prior to grading activities, as outlined in Mitigation measure BIO-1. With implementation of Mitigation Measure BIO-1, impacts to nesting birds would be reduced to a level of less than significant.

Mitigation Measures

BIO-1 To avoid impacts to nesting birds within or adjacent to the Project Site and to comply with the California Fish and Game Codes 3503 & 3513 and Migratory Bird Treaty Act, any site clearing activities should occur between non-nesting (or non-breeding) season for birds (generally, September 1st to January 31st). If this avoidance schedule is not feasible, the project applicant shall carry out such activities under the supervision of a qualified biologist. This shall entail the following: A qualified biologist shall conduct a pre-construction nesting bird survey no more than 14 days prior to initiating ground disturbance activities. The survey will consist of full coverage of the proposed disturbance limits and up to a 500-foot buffer area, determined by the biologist and taking into account the species nesting in the area and the habitat present. If no active nests are found, no additional measures are required. If "occupied" nests are found, their locations shall be mapped, species documented, and, to the degree feasible, the status of the nest (e.g., incubation of eggs, feeding of young, near

fledging) recorded. The biologist shall establish a no-disturbance buffer around each active nest. The buffer area will be determined by the biologist based on the species present, surrounding habitat, and type of construction activities proposed in the area. No construction or ground disturbance activities shall be conducted within the buffer until the biologist has determined the nest is no longer active and has informed the construction supervisor that activities may resume.

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

No Impact. As shown in Figure 3, *Aerial Photograph*, the Project Site is undeveloped land that is heavily disturbed (annually disked). Aside from the single black willow and tamarisk tree located near the northern site boundary, no other trees exist onsite. Project development would involve removal of this single tree. The City of Colton's Tree Protection Guidelines (Section 12.20.041, Tree Protection Guidelines, of the Colton Municipal Code) include provisions and guidelines for tree removal, installation, preservation, and maintenance in the city. The provisions apply to trees on City-owned properties, parkways and public street right-of-way and easements. Project implementation does not involve the removal of any trees on City-owned property. The provisions of Section 12.20.041 do not apply to the Project. Therefore, no impact would occur and no mitigation measures are necessary.

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

No Impact. As shown in Figure 3, the Project Site is in an urbanized area of Colton and surrounded by a mix of commercial, retail, office and residential uses. The Project Site and surrounding area not within or adjacent to a habitat conservation plan or natural community conservation plan. Also, the Project Site is not within or adjacent to the adopted "Draft West Valley Habitat Conservation Plan" for the Delhi Sands flower-loving fly (Appendix B). Therefore, no impact would occur and no mitigation measures are necessary.

3.5 CULTURAL RESOURCES

The analysis in this section is based in part on the following technical study, included as Appendix B to this Initial Study:

- Cultural Resources Assessment, BCR Consulting LLC, February 2022.

Would the project:

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

Less Than Significant Impact. Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources,

or the lead agency. Generally a resource is considered "historically significant" if it meets one of the following criteria:

i) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

ii) Is associated with the lives of persons important in our past;

iii) 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;

iv) Has yielded, or may be likely to yield, information important in prehistory or history.

As shown in Figure 3, *Aerial Photograph*, the majority of the Project Site is undeveloped land that is heavily disturbed (annually disked) and devoid of vegetation. The site consists mainly of bare or exposed soil. There is an existing parking easement and parking lot at the northeast corner of the Project Site, which serves the adjacent apartment complex. The parking area is not a part of the Project and would be protected in place. There is also an existing water house (enclosure with solid wall, roof top and swinging doors) within an easement near the southeast corner of the Project Site. The water house would also be protected in place and is not a part of the project.

Additionally, prior to fieldwork being conducted for the Project Site, BCR Consulting requested an archaeological records search from the South Central Coastal Information Center (SCCIC) at California State University, Fullerton (Appendix C). The records search completed a review of all recorded historic and prehistoric cultural resources, as well as a review of known cultural resources, and survey and excavation reports generated from the Project Site and sites within one mile of the Project Site. In addition, a review was conducted of the National Register of Historic Places (National Register), the California Register of Historical Resources (California Register), and documents and inventories from the California Office of Historic Preservation including the lists of California Historical Landmarks, California Points of Historical Interest, Listing of National Register Properties, and the Inventory of Historic Structures. The records research revealed that 18 cultural resource studies have been completed within the search radius, resulting in the recording of two cultural resources (both historic period built environment resources). None of the previous studies have assessed the Project Site for cultural resources and no cultural resources have been identified within the Project Site boundary.

Furthermore, an intensive pedestrian survey of the Project Site was conducted by BCR Consulting staff. During the field survey, BCR Consulting archaeologists identified two cultural resources (one isolated prehistoric granitic mano and one historic-period pump house) within the Project Site boundary. However, neither resource is eligible for the California Register; therefore, neither resource is considered a historical resource. They are not significant under CEQA and do not warrant further consideration.

Based on the preceding, no impact to historical resources would occur and no mitigation measures are necessary.

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

Less Than Significant Impact With Mitigation Incorporated. Archaeological resources are prehistoric or historic evidence of past human activities, including structural ruins and buried resources. As shown in Figure 3, *Aerial Photograph*, the majority of the Project Site is undeveloped land that is heavily disturbed (annually disked) and devoid of vegetation. The site consists mainly of bare or exposed soil. Given the undeveloped condition of the Project Site, the potential exists for Project development to impact unidentified archeological resources that may underly the site.

A cultural resources assessment was conducted for the Project Site by BCR Consulting (Appendix C). The purpose of the assessment was to determine the presence or absence of and potential impact to archaeological resources as a result of Project development. As noted above, BCR Consulting requested an archaeological records search from the SCCIC. The records search completed a review of all recorded historic and prehistoric cultural resources, as well as a review of known cultural resources, and survey and excavation reports generated from the Project Site and sites within one mile of the Project Site. The records research revealed that 18 cultural resource studies have been completed within the search radius, resulting in the recording of two cultural resources (both historic period built environment resources). None of the previous studies have assessed the Project Site for cultural resources and no cultural resources have been identified within the Project Site boundary.

Additionally, and as noted above, an intensive pedestrian survey of the Project Site was conducted by BCR Consulting staff (Appendix C). During the field survey, BCR Consulting archaeologists identified two cultural resources (one isolated prehistoric granitic mano and one historic-period pump house) within the Project Site boundary. Further, the results of the Sacred Lands File search conducted through the Native American Heritage Commission (NAHC) was positive.

Based on the results of the cultural resources records search, Sacred Lands File search and field survey of the Project Site, the cultural resources assessment concluded that no additional cultural resources work or monitoring is necessary. However, although the assessment has not indicated sensitivity for cultural resources within the Project Site boundary, Project related ground-disturbing activities (e.g., grading and excavation) have the potential to reveal buried deposits not observed on the surface during previous surveys. Therefore, while unlikely, the presence of subsurface archaeological resources on the Project Site remains possible, and these could be affected by ground-disturbing activities associated with the Project.

However, implementation of Mitigation Measure CUL-1 would avoid or minimize potential Project impacts to archaeological resources. With implementation of Mitigation Measure CUL-1, impacts to archeological resources would be reduced to a less than significant level.

Mitigation Measures

CUL-1 Prior to the issuance of grading permits, the project applicant shall provide a letter to the City of Colton Planning Division from a qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications for Archeology as defined at 36 CFR Part 61,

Appendix A (Professional Archeologist). The letter shall state that the project applicant has retained such an individual, and that the consultant will be on call during all grading and other significant ground-disturbing activities.

In the event that potential archeological resources are discovered during ground-disturbing activities, all such activity shall cease in the immediate area of the find (within a 60-foot buffer), and the professional archeological monitor shall have the authority to halt any activities adversely impacting potentially significant cultural resources until they can be formally evaluated. Suspension of ground disturbances in the vicinity of the discovery shall not be lifted until the archaeological monitor has evaluated the discovery to assess whether it is classified as a significant cultural resource pursuant to the CEQA (California Environmental Quality Act) definition of historical (State CEQA Guidelines 15064.5[a]) and/or unique archeological resource (Public Resources Code 21083.2[g]). Work may continue in other areas of the Project Site outside of the buffered area and for other project elements while the encountered find is evaluated. Additionally, the Gabrieleño Band of Mission Indians – Kizh Nation shall be contacted regarding any pre-contact and/or historic era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find in order to provide Kizh Nation input with regards to significance and treatment. The City and/or project applicant shall, in good faith, consult with Kizh Nation throughout the duration of ground-disturbing activities.

If upon completion of the assessment the archeological monitor determines that the find qualifies as a significant cultural resource, the qualified archeologist shall make recommendations on the treatment and disposition of the deposits, which shall be developed in accordance with all applicable provisions of California Public Resource Code Section 21083.2 and State CEQA Guidelines Sections 15064.5 and 15126.4. For example, if significant cultural resources are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan (MTP). The MTP shall be overseen and implemented by the archeologist and include mitigation measures to follow regarding identification and recording methods, and evaluation and final treatment of any cultural resources identified. The MTP shall allow for a Kizh Nation monitor to be present for the remainder of the ground-disturbing activities, should Kizh Nation elect to place a monitor onsite. Likely mitigations would involve temporary avoidance of the area of discovery plus a 60-foot buffer, development of a cultural resources eligibility evaluation plan in consultation with Kizh Nation and the City, and test excavation to determine eligibility of any discovery for California Register of Historical Resources listing eligibility. Final disposition of any artifacts recovered shall be determined during development of the evaluation plan and would be likely to include reburial onsite, donation to Kizh Nation or other Native American entities, or curation at a federally approved repository. The draft MTP, and any/all archaeological/cultural documents created (isolate records, site records, survey reports, testing reports, etc.), shall be provided to the City for dissemination to Kizh Nation. The archaeologist shall monitor the remainder of the project site and implement the

MTP accordingly. The archaeologist shall prepare a final report describing all identified and curated resources (if any are found) and submit the report to the City for dissemination to SMBMI. If disturbed resources are required to be collected and preserved, the project applicant shall be required to participate financially up to the limits imposed by Public Resources Code Section 21083.2.

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

Less Than Significant Impact. There are no known human remains or cemeteries on or near the Project Site. As shown in Figure 3, *Aerial Photograph*, the Project Site is undeveloped land and is surrounded by a mix of commercial, retail, office, and residential uses. The immediate surrounding vicinity has also experienced ground disturbance associated with the development of existing buildings, roadways, and other urbanized land uses. Therefore, the likelihood that human remains may be discovered during site clearing and grading activities is considered extremely low. However, Project development would have the potential to disturb previously undiscovered subsurface human remains, if any exist. For example, the Project would involve excavation activities over the entire Project Site.

In the unlikely event that human remains are uncovered during ground-disturbing activities, California Health and Safety Code Section 7050.5 requires that disturbance of the site shall remain halted until the San Bernardino County Coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to his or her authorized representative, in the manner provided in Section 5097.98 of the California Public Resources Code. The coroner is required to make a determination within two working days of notification of the discovery of the human remains. If the coroner determines that the remains are not subject to his or her authority or has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC) so that NAHC can contact the Most Likely Descendant (MLD). The MLD shall be provided access to the discovery and will provide recommendations or preferences for treatment of the remains within 48 hours of accessing the discovery site. Disposition of human remains and any associated grave goods, if encountered, shall be treated in accordance with procedures and requirements set forth in Sections 5097.94 and 5097.98 of the Public Resources Code; Section 7050.5 of the California Health and Safety Code; and CEQA Guidelines Section 15064.5.

Compliance with existing law regarding the discovery of human remains would reduce potential impacts to human remains to less than significant levels. Therefore, no mitigation measures are necessary.

3.6 ENERGY

Would the project:

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

Less Than Significant Impact. The Project would result in short-term construction and long-term operational energy consumption. The following is a discussion of the potential energy demands from activities associated with construction and operation of the Project.

Short-Term Construction Impacts

Construction of the Project would create temporary increased demands for electricity and vehicle fuels compared to existing conditions.

Electrical Energy

Electricity use during construction of the Project would vary during different phases of construction. The majority of construction equipment would be gas- or diesel-powered, and electricity would not be used to power most of the construction equipment. Later construction phases could result in the use of electricity-powered equipment for interior construction and architectural coatings. However, it is anticipated that the majority of electric-powered construction equipment would be hand tools (e.g., power drills, table saws) and lighting, which would result in minimal electricity usage during construction activities. Therefore, Project-related construction activities would not result in wasteful or unnecessary electricity demands Impacts would be less than significant and no mitigation measures are necessary.

Natural Gas Energy

It is not anticipated that construction equipment used for the Project would be powered by natural gas, and no natural gas demand is anticipated during construction. Therefore, impacts would be less than significant and no mitigation measures are necessary.

Transportation Energy

Transportation energy use during construction of Project would come from delivery vehicles and construction employee vehicles. In addition, transportation energy demand would come from use of off-road construction equipment. It is anticipated that the majority of off-road construction equipment, such as those used during grading, would be gas or diesel powered. The use of energy resources by these vehicles would fluctuate according to the phase of construction.

To limit wasteful and unnecessary energy consumption, the construction contractors are anticipated to minimize nonessential idling of construction equipment during construction, in accordance with 13 CCR § 2449. In addition, construction trips would not result in unnecessary use of energy since the Project Site is centrally located and is served by numerous regional freeway systems (e.g., I-215 and I-10) that provide the most direct routes from various areas of the region. Furthermore, electrical energy would be available for use

during later construction activities, following installation of power lines and connections, precluding the use of less efficient generators. Moreover, all construction equipment would cease operating upon completion of project construction. Therefore, energy use during Project construction would not be considered inefficient, wasteful, or unnecessary. Impacts would be less than significant and no mitigation measures are necessary.

Long-Term Impacts During Operation

Operation of the Project would generate new demand for electricity, natural gas, and transportation energy on the Project Site. Operational use of energy would include heating, cooling, and ventilation of the building; water heating; operation of electrical systems, use of on-site equipment and appliances; and indoor, outdoor lighting.

Electrical Energy

Electrical service to the Project would be provided by Colton Electric Utilities through connections to existing off-site electrical lines and new on-site infrastructure. As shown in Table 4, implementation of the Project would result in 260,983 kilowatt hours of electricity use per year.

Table 4 Electricity Consumption

Land Use	Electricity (kWh/year)
Proposed Project Conditions	
Automobile Care Center	257,325
Parking Lot	3,658
Total	**260,983**

Source: CalEEMod Version 2020.4
Note: kWh = kilowatt hour(s)

While the Project would result in a new electricity demand, it would be consistent with the requirements of the Building Energy Efficiency Standards. The Project would also be required to comply with CALGreen. Therefore, Project operation would not result in wasteful or unnecessary electricity demands and would not result in a significant impact related to electricity. Impacts would be less than significant and no mitigation measures are necessary.

Natural Gas Energy

The potential natural gas consumption for Project operation is shown in Table 5. As shown in the table, the Project would generate an average natural gas demand of 838,640 kilo British thermal units per year, primarily due to natural gas use by the RV preparation and repair center. While the Project would result in new natural gas demand to the Project Site, it would be consistent with the requirements of the Building Energy Efficiency Standards and would not result in wasteful or unnecessary natural gas demands. Therefore, impacts would be less than significant and no mitigation measures are necessary.

Table 5 Natural Gas Consumption

Land Use	Natural Gas (kBTU/year)
Proposed Project Conditions	
Automobile Care Center	838,640
Total	**838,640**

Source: CalEEMod Version 2020.4
Note: kBTU = kilo British thermal units

Transportation Energy

The Project would consume transportation energy during operations from the use of motor vehicles. The efficiency of these motor vehicles is unknown, such as the average miles per gallon. Estimates of transportation energy use are based on the overall vehicle miles traveled (VMT) and associated transportation energy use. The Project-related VMT would primarily come from the employees. In addition, as discussed in Section 3.14, *Population and Housing*, it is anticipated that employees from the local workforce would be hired during both the construction and operational phases of the Project. These features of the Project would contribute to minimizing VMT and transportation-related fuel usage. Thus, it is expected that operation-related fuel usage associated with the Project would not be any more inefficient, wasteful, or unnecessary than similar development projects. Therefore, impacts would be less than significant and no mitigation measures are necessary.

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

No Impact. The state's electricity grid is transitioning to renewable energy under California's Renewable Energy Program. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. Electricity production from renewable sources is generally considered carbon neutral. Executive Order S-14-08, signed in November 2008, expanded the state's renewable portfolios standard (RPS) to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). Senate Bill (SB) 350 (de Leon) was signed into law September 2015 and establishes tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. SB 350 also set a new goal to double the energy-efficiency savings in electricity and natural gas through energy efficiency and conservation measures. On September 10, 2018, Governor Brown signed SB 100, which supersedes the SB 350 requirements. Under SB 100, the RPS for publicly owned facilities and retail sellers consist of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. Additionally, SB 100 established a new RPS requirement of 50 percent by 2026. The bill also established a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Under SB 100 the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

The statewide RPS goal is not directly applicable to individual development projects, but to utilities and energy providers such as Colton Electric Utilities, which is the utility that would provide all of electricity needs for the Project. Compliance of Colton Electric Utilities in meeting the RPS goals would ensure the

State meets its objective in transitioning to renewable energy. The Project would also comply with the latest 2019 Building Energy Efficiency Standards and CALGreen. Therefore, implementation of the Project would not conflict or obstruct plans for renewable energy and energy efficiency. Therefore, no impact would occur and no mitigation measures are necessary.

3.7 GEOLOGY AND SOILS

The analysis in this section is based partly on the following technical studies, which are included as Appendices C and D, respectively, to this Initial Study.

- Cultural Resources Assessment, BCR Consulting, February 2022.
- Geotechnical Engineering Investigation, C.Y. Geotech Inc., January 2020.

Would the project:

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

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

Less Than Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. Surface rupture is the most easily avoided seismic hazard. Fault rupture generally occurs within 50 feet of an active fault line and is limited to the immediate area of the fault zone where the fault breaks along the surface. The main purpose of the Alquist-Priolo Earthquake Fault Zoning Act is to prevent construction of buildings used for human occupancy on the surface of active faults, in order to minimize the hazard of surface rupture of a fault to people and habitable buildings. Before cities and counties can permit development within Alquist-Priolo Earthquake Fault Zones, geologic investigations are required to show that the proposed development site is not threatened by surface rupture from future earthquakes.

The Project Site is not within any of the mapped Alquist-Priolo Special Studies Zones and no fault trace of any known active or potentially active fault passes through the site (Appendix D). The fault systems that are nearest to the Project Site and may affect the stability of the site are the Glen Helen, Lytle Creek Ridge-Claremont fault (approximately 1.3 miles from the site), San Gorgonio-Banning fault (approximately 4.4 miles from the site), San Andreas fault (approximately 8.1 miles from the site), and Cucamonga fault (approximately 11.3 miles from the site). However, due to the distance to these faults, the potential for surface rupture of a fault onsite is considered very low. Therefore, Project development would not subject people or structures to hazards arising from surface rupture of a known active fault. Impacts would be less than significant, and no mitigation measures are necessary.

ii) Strong seismic ground shaking?

Less Than Significant Impact. The most significant geologic hazard to the design life of the Project is the potential for moderate to strong ground shaking resulting from earthquakes generated on the faults in seismically active southern California. As with other areas in southern California, it is anticipated that the Project Site will likely be subject to strong ground shaking due to earthquakes on nearby faults. The Project Site is in close proximity to several surface faults that are presently zoned as active or potentially active by the California Geological Survey (CGS). The nearest known active fault—that is, a fault that has ruptured during Holocene time (the last 11,700 years)—is the Lytle Creek Ridge-Claremont fault, which is approximately 1.3 miles from the site. The site is also within 8.1 miles of the San Andreas fault, which is also an active fault. These faults, as well as others in the region, are considered capable of producing strong shaking at the Project Site, thereby exposing people or structures on the site to potential substantial adverse effects, including the risk of loss, injury, or death. The intensity of ground shaking on the Project Site would depend on the magnitude of the earthquake, distance to the epicenter, and the geology of the area between the epicenter and the Project Site.

However, the Project Site is not at a greater risk of seismic activity or impacts than other sites in southern California. Seismic shaking is a risk throughout southern California. Additionally, the state regulates development in California through a variety of tools that reduce hazards from earthquakes and other geologic hazards. The California Building Code (CBC; California Code of Regulations, Title 24, Part 2), adopted by reference in Section 15.06 (Building Code) of the Colton Municipal Code, contains provisions to safeguard against major structural failures or loss of life caused by earthquakes or other geologic hazards. The CBC contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock onsite, and the strength of ground motion with specified probability of occurring at the site. Project development would be required to adhere to the provisions of the CBC, which are enforced by the City during the building plan check and development review process. Compliance with the requirements of the CBC for structural safety during a seismic event would reduce hazards from strong seismic ground shaking.

Furthermore, incorporation of the recommended design parameters from the geotechnical report prepared for the Project (Appendix D) would also reduce hazards from strong seismic ground shaking. The City would impose the recommended design parameters as a condition of approval, and compliance would be ensured through the City's building plan check and development review process.

In summary, compliance with the provisions of the CBC and implementation of the recommended design parameters outlined in the geotechnical report would reduce impacts resulting from strong seismic ground shaking. Therefore, impacts would be less than significant and no mitigation measures are necessary.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a phenomenon that occurs when soil undergoes a transformation from a solid state to a liquified condition. It refers to loose, saturated sand or silt deposits that behave as a liquid and lose their load-supporting capability when strongly shaken. Loose granular

soils and silts that are saturated by relatively shallow groundwater are susceptible to liquefaction. When subjected to seismic ground shaking, affected soils lose strength during liquefaction and foundation failure can occur.

The Project Site is within the Generalized Liquefaction susceptible zones as mapped in the San Bernardino County Land Use Plan. Therefore, a detailed liquefaction evaluation was performed as a part of the geotechnical report prepared for the Project. As concluded in the geotechnical report, liquefaction analysis confirmed that the potential for liquefaction at the Project Site is low (Appendix D).

Additionally, Project Site grading, design, and construction would conform with the recommended design parameters of the geotechnical report prepared for the Project. The City would impose the recommended design parameters as a condition of any required planning approval, and compliance would be ensured through the City's building plan check and development review process

Therefore, impacts would be less than significant, and no mitigation measures are necessary.

iv) Landslides?

No Impact. Landslides are the downslope movement of geologic materials. Slope failures in the form of landslides are common during strong seismic shaking in areas of steep hills. The Project Site is fairly level, and no evidence of deep-seated slope failure or other type of slope failure was observed during the site reconnaissance. The site is not within any of the landslide areas mapped in the available public geologic and geotechnical maps (Appendix D). Therefore, geologic hazards associated with landslides are not anticipated at the site. No impact would occur and no mitigation measures are necessary

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

Less Than Significant Impact. Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion in the project region include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earth-moving activities if erosion control measures are not used.

Following is a discussion of the potential erosion impacts resulting from the Project's construction and operational phases.

Construction Phase

Project development would involve excavation, grading, and construction activities that would disturb soil and leave exposed soil on the ground surface. Common means of soil erosion from construction sites include water, wind, and being tracked offsite by vehicles. These activities could result in soil erosion. However, development on the Project Site is subject to local and state codes and requirements for erosion control and grading during construction. For example, Project development is required to comply with standard regulations, including South Coast Air Quality Management District Rules 402 and 403, which would reduce construction erosion impacts. Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property

line of the emissions source. Rule 402 requires dust suppression techniques be implemented to prevent dust and soil erosion from creating a nuisance offsite. For example, as outlined in Table 1 of Rule 403 (Best Available Control Measures), control measures to reduce erosion during grading and construction activities include stabilizing backfilling materials when not actively handling, stabilizing soils during clearing and grubbing activities, and stabilizing soils during and after cut-and-fill activities.

Additionally, the Construction General Permit (CGP; 2009-0009-DWQ as amended by 2010-0014-DWQ and 2012-0006-DWQ) issued by the State Water Resources Control Board, regulates construction activities to minimize water pollution, including sediment risk from construction activities to receiving waters. Project development would be subject to the National Pollution Discharge Elimination System (NPDES) permitting regulations, including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP), which is further discussed in Section 3.10, *Hydrology and Water Quality*. The Project's construction contractor would be required to prepare and implement a SWPPP and associated best management practices (BMPs) in compliance with the Construction General Permit (CGP) during grading and construction. For example, as outlined in Section 3.10, types of BMPs that are incorporated in SWPPPs and would help minimize impacts from soil erosion include:

- **Erosion controls.** cover and/or bind soil surface, to prevent soil particles from being detached and transported by water or wind. Erosion control BMPs include mulch, soil binders, and mats.
- **Sediment controls.** Filter out soil particles that have been detached and transported in water. Sediment control BMPs include barriers, and cleaning measures such as street sweeping.
- **Tracking controls.** Tracking control BMPs minimize the tracking of soil offsite by vehicles; for instance, stabilizing construction roadways and entrances/exits.

Adherence to the BMPs in the SWPPP and adherence with local and state codes including Section 13.30.120 (Grading Design Plan) of the Colton Municipal Code, would reduce, prevent, or minimize soil erosion from Project-related grading and construction activities. Therefore, soil erosion impacts from Project-related grading and construction activities would be less than significant and no mitigation measures are necessary.

Operation Phase

The Project Site is in a highly urbanized area of Colton and is generally flat. No major slopes or bluffs are on or adjacent to the site. After Project completion, the site would be developed with buildings, parking, and landscape improvements and would not contain exposed or bare soil. Upon Project completion, the potential for soil erosion or the loss of topsoil would be expected to be low. Therefore, soil erosion impacts from the Project's operation phase would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. Hazards from liquefaction are addressed above in Section 3.7.a.iii, and landslide hazards are addressed in Section 3.7.a.iv. As concluded in these sections, impacts would be less than significant and no mitigation measures are necessary.

Following is a discussion of the potential impacts resulting from other site geologic and soil conditions of the Project Site.

Lateral Spreading

Lateral spreading is a phenomenon that occurs in association with liquefaction and includes the movement of non-liquefied soil materials. Due to the relatively low potential for liquefaction on the Project Site, the potential for lateral spreading is considered low. Also, Project development would comply with the recommended design parameters of the geotechnical report prepared for the Project (Appendix D). Therefore, impacts would be less than significant and no mitigation measures are necessary.

Collapsible Soils

Collapsible soils shrink upon being wetted and/or being subject to a load. Artificial fill was encountered from ground surface in most of the borings on the site and to a maximum depth of 2 feet. The fill soil consisted primarily of light brown silty sand in a dry to slightly moist and loose to moderately dense condition. River channel alluvium was encountered either from ground surface or underlying fill soil in the borings. The alluvial soil consisted primarily of light brown to grayish brown silty sand and gray to grayish brown gravelly sand.

The geotechnical report included consolidation testing that showed that consolidation was very minimal (less than 1 percent), indicating that the soils on site are not collapsible. Additionally, Project Site grading, design, and construction would conform with the recommended design parameters of the geotechnical report. The City would impose the recommended design parameters as a condition of approval, and compliance would be ensured through the City's building plan check and development review process. Therefore, impacts would be less than significant and no mitigation measures are necessary.

Ground Subsidence

The major cause of ground subsidence is the excessive withdrawal of groundwater. Soils with high silt or clay content are particularly susceptible to subsidence. The Project Site is not over a groundwater basin where substantial ground subsidence has been identified (USGS 2022). Additionally, Project development would be implemented in accordance with the recommended design parameters of the geotechnical report prepared for the Project (Appendix D). With implementation of the design parameters of the geotechnical report, which would be imposed by the City as a condition of approval and ensured through the City's building plan check and development review process, Project development would not subject people or structures to

substantial hazards arising from ground subsidence. Therefore, impacts would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. Expansive soils shrink or swell as the moisture content decreases or increases; the shrinking or swelling can shift, crack, or break structures built on such soils. Based on laboratory testing conducted as a part of the geotechnical report prepared for the Project (Appendix D), the expansion index of samples collected on the site was zero. Soils with an expansion index of zero are considered non-expansive soils. Additionally, Project development would be required to incorporate the recommendations provided in the geotechnical report and adhere to the provisions of the CBC. Therefore, impacts would be less than significant and no mitigation measures are necessary

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?

No Impact. The Project would include construction of sewer laterals to existing sewers in surrounding roadways. The Project would not involve the use of septic tanks or other alternative wastewater disposal systems. Therefore, no impact would occur and no mitigation measures are necessary

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

Less Than Significant Impact. Paleontological resources are commonly known as fossils, that is, the recognizable physical remains, or evidence of past life forms found on earth in past geological periods—including bones, shells, leaves, tracks, burrows, and impressions.

The Cultural Resources Assessment prepared for the Project (see Appendix C) concluded that geologic units underlying the Project Site are mapped entirely as alluvial sand, gravel, and clay deposits dating to the Holocene. While Holocene alluvial units are of high preservation value, material found is unlikely to be fossil material due to the relatively modern associated dates of the deposits. However, if development requires any substantial depth of disturbance, the likelihood of reaching older Holocene or Late Pleistocene alluvial sediments would increase. Excavation deeper than 5 feet is not anticipated for Project development; therefore, the likelihood of unearthing paleontological resources is highly unlikely. Additionally, there are no unique geological features onsite or adjacent to or surrounding the Project Site. The Project Site exhibits generally flat topography. Therefore, impacts would be less than significant and no mitigation measures are necessary.

3.8 GREENHOUSE GAS EMISSIONS

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as greenhouse gases (GHGs), into the atmosphere. The primary source of these GHG is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO_2), methane (CH_4), and ozone (O_3)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHG identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.[3]

Information on manufacture of cement, steel, and other "life cycle" emissions that would occur as a result of the project are not applicable and are not included in the analysis.[4] Black carbon emissions are not included in the GHG analysis because the California Air Resources Board (CARB) does not include this pollutant in the state's Senate Bill 32 (SB 32) inventory and treats this short-lived climate pollutant separately.[5] A background discussion on the GHG regulatory setting and GHG modeling can be found in Appendix A to this Initial Study.

Would the project:

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

Less Than Significant Impact. Global climate change is not confined to a particular project area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough greenhouse gas emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact.

Project-related construction and operation-phase GHG emissions are shown in Table 6. The Project would generate 71 weekday average daily vehicle trips, consisting of 31 passenger vehicle trips and 40 truck trips

[3] Water vapor (H_2O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant, but part of the feedback loop rather than a primary cause of change.

[4] Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analyses was not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (CNRA 2018a). Because the amount of materials consumed during the operation or construction of the proposed project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials are also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (OPR 2008).

[5] Particulate matter emissions, which include black carbon, are analyzed in Section 3.3, Air Quality. Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel particulate matter. The state's existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years (CARB 2017a.).

associated with RV delivery. Operation of the Project would also result in an increase in water demand, wastewater and solid waste generation, area sources (e.g., consumer cleaning products), and energy usage (i.e., natural gas and electricity). Annual average construction emissions were amortized over 30 years and included in the emissions inventory to account for one-time GHG emissions from the construction phase of the Project. As demonstrated in Table 6, development and operation of the Project would not generate annual emissions that exceed the South Coast AQMD Working Group bright-line threshold of 3,000 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year (South Coast AQMD 2010). Therefore, the Project's cumulative contribution to GHG emissions would be less than significant and no mitigation measures are necessary.

Table 6 Project-Related Operation GHG Emissions

Source	GHG Emissions ($MTCO_2e$/Year)	Percentage of Total Emissions
Area	<1	<1%
Energy	118	35%
Mobile	122	36%
Offroad	44	13%
Solid Waste	20	6%
Water	12	4%
Amortized Construction Emissions[1]	23	7%
Total	339	100%
South Coast AQMD Bright-Line Threshold	3,000 $MTCO_2e$/Yr	NA
Exceeds Bright-Line Threshold?	**No**	**NA**

Source: CalEEMod, Version 2020.4.
Notes: MTons = metric tons; $MTCO_2e$ = metric ton of carbon dioxide equivalent
[1] Total construction emission are amortized over 30 years per South Coast AQMD methodology.

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

Less Than Significant Impact. Applicable plans adopted for the purpose of reducing GHG emissions include CARB's Scoping Plan, the Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). A consistency analysis with these plans is presented below.

CARB Scoping Plan

The CARB Scoping Plan is applicable to state agencies but is not directly applicable to cities/counties and individual projects (i.e., the Scoping Plan does not require the City to adopt policies, programs, or regulations to reduce GHG emissions). However, new regulations adopted by the state agencies outlined in the Scoping Plan result in GHG emissions reductions at the local level. As a result, local jurisdictions benefit from reductions in transportation emissions rates, increases in water efficiency in the building and landscape codes, and other statewide actions that affect a local jurisdiction's emissions inventory from the top down. Statewide strategies to reduce GHG emissions include the Low Carbon Fuel Standard (LCFS) and changes in the

corporate average fuel economy standards (e.g., Pavley I and Pavley California Advanced Clean Cars program).

The Project would adhere to the programs and regulations identified by the Scoping Plan and implemented by state, regional, and local agencies to achieve the statewide GHG reduction goals of AB 32 and SB 32. For example, the Project and new proposed building would meet the latest applicable CALGreen and Building Energy Efficiency Standards. The California Energy Commission anticipates that new nonresidential buildings will be required to achieve zero net energy by 2030. Project GHG emissions shown in Table 6 include reductions associated with statewide strategies that have been adopted since AB 32. Therefore, the Project would not obstruct implementation of the CARB Scoping Plan. Impacts would be less than significant and no mitigation measures are necessary.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy

SCAG adopted the 2020-2045 RTP/SCS (Connect SoCal) on in September 2020. Connect SoCal identifies that land use strategies that focus on new housing and job growth in areas rich with destinations and mobility options are consistent with a land use development pattern that supports and complements the proposed transportation network. The overarching strategy in Connect SoCal is to plan for the southern California region to grow in more compact communities in transit priority areas and priority growth areas; provide neighborhoods with efficient and plentiful public transit; establish abundant and safe opportunities to walk, bike, and pursue other forms of active transportation; and preserve more of the region's remaining natural lands and farmlands (SCAG 2020). Connect SoCal's transportation projects help more efficiently distribute population, housing, and employment growth, and forecast development is generally consistent with regional-level general plan data to promote active transportation and reduce GHG emissions. The projected regional development, when integrated with the proposed regional transportation network in Connect SoCal, would reduce per-capita GHG emissions related to vehicular travel and achieve the GHG reduction per capita targets for the SCAG region.

The Connect SoCal Plan does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency for governments and developers. Project implementation would result in an increase of vehicle trips to the Project Site. However, the Project is considered an infill development project and would be in a currently developed commercial area. Therefore, the Project would not interfere with SCAG's ability to implement the regional strategies outlined in the Connect SoCal Plan. Impacts would be less than significant and no mitigation measures are necessary.

3.9 HAZARDS AND HAZARDOUS MATERIALS

Would the project:

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

No Impact. Less Than Significant Impact. Less Than Significant Impact With Mitigation Incorporated. The term "hazardous material" can be defined in different ways. For purposes of this

environmental document, the definition of "hazardous material" is the one outlined in the California Health and Safety Code, Section 25501:

> Hazardous materials that, because of their quantity, concentration, or physical or chemical characteristics, pose a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the unified program agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

"Hazardous waste" is a subset of hazardous materials, and the definition is essentially the same as in the California Health and Safety Code, Section 25117, and in the California Code of Regulations, Title 22, Section 66261.2:

> Hazardous wastes are those that, because of their quantity, concentration, or physical, chemical, or infectious characteristics, may either cause, or significantly contribute to an increase in mortality or an increase in serious illness, or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

Hazardous materials can be categorized as hazardous nonradioactive chemical materials, radioactive materials, and biohazardous materials (infectious agents such as microorganisms, bacteria, molds, parasites, viruses, and medical waste).

Exposure of the public or the environment to hazardous materials could occur through but not limited to the following means: improper handling or use of hazardous materials or waste, particularly by untrained personnel; transportation accident; environmentally unsound disposal methods; and/or fire, explosion, or other emergencies. The severity of potential effects varies with the activity conducted, the concentration and type of hazardous material or wastes present, and the proximity of sensitive receptors.

Following is a discussion of the Project's potential to create a significant hazard to the public or the environment through the routine use, storage, transport, or disposal of hazardous materials during the operational and construction phases.

Project Operation

The operation activities of the Project do not involve the use of unusually hazardous materials that could impact surrounding land uses. Project operation would involve the use of small amounts of hazardous materials, such as cleansers, paints, degreasers, adhesive, sealers, fertilizers, and pesticides for cleaning and maintenance purposes. Additionally, the proposed activities on site are not associated with uses that use, generate, store, or transport large quantities of hazardous materials; such uses generally include manufacturing, industrial, medical (e.g., hospital), and other similar uses.

Furthermore, the use, storage, transport, and disposal of hazardous materials would be governed by existing regulations of several agencies, including the US Environmental Protection Agency, US Department of Transportation, California Division of Occupational Safety and Health, San Bernardino County Department of Public Health, San Bernardino County Fire Department, and the Colton Fire Department. Compliance with applicable laws and regulations governing the use, storage, transportation, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts.

Therefore, substantial hazards to the public or the environment arising from the routine use, storage, transport, and disposal of hazardous materials during long-term operation of the Project would not occur. Impacts would be less than significant and no mitigation measures are necessary.

Project Construction

Project-related construction activities would involve the use of larger amounts of hazardous materials than would project operation. Construction activities would involve use of hazardous materials including cleansers and degreasers; fluids used in routine maintenance and operation of construction equipment, such as oil and lubricants; fertilizers; pesticides; and architectural coatings including paints. However, the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. These activities would also be short term or one time in nature and would cease upon completion of the Project's construction phase. As standard practice in the construction industry, Project construction workers are trained in safe handling and hazardous materials use.

Furthermore, as with Project operation, the use, storage, transport, and disposal of construction-related hazardous materials would be required to conform to existing laws and regulations. Compliance with applicable laws and regulations governing the use, storage, transportation, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts. For example, all spills or leakage of petroleum products during construction activities are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable state and local regulations for the cleanup and disposal of that contaminant. All contaminated waste would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility.

Based on the preceding, hazards to the public or the environment arising from the routine use of hazardous materials during Project construction would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. Following is a discussion of the potential hazards impacts that could arise through the accidental release of hazardous materials from the Project's construction and operational phases.

Hazardous Materials Associated with Project Construction and Operation

See response to Section 3.9.a., above. As concluded in this section, hazards to the public or the environment arising from the routine use of hazardous materials during Project operation and construction phases would less than significant and no mitigation measures are necessary. In the event of a hazardous materials spill of greater amount or toxicity than onsite personnel could safely contain and clean up, assistance would be requested from the San Bernardino County Fire Protection District's hazmat team.

Based on the preceding, it is unlikely that development of the Project would cause the release of hazardous materials into the environment. Therefore, impacts would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. Sierra School of East Valley is approximately 650 feet north of the Project Site and the Solon Junior Academy is approximately 700 feet northeast of the site. As substantiated in Sections 3.9.a and 3.9.b, above, the Project does not include elements or aspects that would create or otherwise result in hazardous emissions. Additionally, the transport of any hazardous materials during the Project's construction phase would generally occur along E Santo Antonio Drive, S Mt Vernon Avenue and the Riverside Freeway. The transport of such materials would not occur along or around the streets that surround the school sites. Therefore, no impact would occur and no migration measures are necessary

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

No Impact. California Government Code Section 65962.5 requires the compiling of lists of the following types of hazardous materials sites: hazardous waste facilities subject to corrective action; hazardous waste discharges for which the State Water Quality Control Board has issued certain types of orders; public drinking water wells containing detectable levels of organic contaminants; underground storage tanks with reported unauthorized releases; and solid waste disposal facilities from which hazardous waste has migrated. The following databases were reviewed for hazardous material site listings onsite or within one-quarter mile of the Project Site:

- GeoTracker, State Water Resources Control Board (SWRCB 2022)
- EnviroStor, Department of Toxic Substances Control (DTSC 2022)
- EJScreen, US Environmental Protection Agency (USEPA 2022a)
- EnviroMapper, US Environmental Protection Agency (USEPA 2022b)
- Solid Waste Information System (SWIS), California Department of Resource Recovery and Recycling (CalRecycle 2019a)

Based on the database searches, no hazardous materials sites were listed on the Project Site or within 0.25 mile of the Project Site. Therefore, no impacts to the public or to the environment would occur as a result of the Project and no mitigation measures are necessary.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles or 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?

No Impact. The nearest public-use airport to the Project Site is San Bernadino International Airport approximately five miles to the northeast. No airport land use plan has been adopted for the San Bernadino International Airport; however, the Project Site is not within a two mile of the airport. Therefore, no impact would occur and no mitigation measures are necessary

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. Emergency response activities typically focus on actions necessary to save lives and prevent further property damage during an emergency/disaster. The Colton Police and Fire Departments have standard emergency response procedures in place that work in tandem with the City's Emergency Operations Plan (EOP). The City's EOP is primarily responsible for informing the emergency management strategies for the City and is organized into four categories: mitigation, preparedness, response, and recovery. To guide response activities, the City works closely with volunteer organizations such as the Community Emergency Response Team's Communications Services, which help orchestrate internal and external communications, logistics, and assistance during large scale emergencies (Colton 2018).

The Project Site does not front any streets designated as an evacuation route in the City of Colton's General Plan Safety Element and construction activities related to the Project would not include improvements to local roads in the city or within the Project vicinity (Colton 2018).

During the construction and operation phases, the Project would not interfere with any of the daily operations of the Colton Fire or Police Departments or the implementation of the EOP. All construction activities would be required to be performed per the City's standards and regulations. The Project would be required to provide the necessary on- and offsite access and circulation for emergency vehicles and services during the construction and operation phases.

The Project would also be required to go through the City's development review and permitting process and would be required to incorporate all applicable design and safety standards and regulations in the CBC and the Fire Code to ensure that Project development does not interfere with the provision of local emergency services (provision of adequate access roads to accommodate emergency response vehicles, adequate numbers/locations of fire hydrants, etc.).

Based on the preceding, implementation of the Project (both the construction and operational phases) would not impair implementation of or physically interfere with emergency response or evacuation plans. Therefore, no impact would occur and no mitigation measures are necessary.

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

No Impact. A wildland fire hazard area is typically characterized by areas with limited access, rugged terrain, limited water supply, and combustible vegetation. As shown in Figure 3, *Aerial Photograph*, the Project Site is in a highly urbanized area of Colton and is surrounded by a mix of commercial, retail, office and residential development. The Project Site has good access and would be served by adequate water infrastructure. There is no combustible wildland vegetation on or near the site. Additionally, the Project Site is not in or near a Fire Hazard Severity Zone mapped by the California Department of Forestry and Fire Protection (CAL FIRE 2022). Therefore, no impact would occur and no mitigation measures are necessary.

3.10 HYDROLOGY AND WATER QUALITY

The analysis in this section is based partly on the following technical studies, which are included as Appendices E and F, respectively, to this Initial Study:

- Water Quality Management Plan, raSmith, April 21, 2021.
- Preliminary Drainage Report, raSmith, December 20, 2021.

Would the project:

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

Less Than Significant Impact. The city, including the Project Site, is in the Upper Santa Ana River watershed. The Santa Ana River watershed is the largest stream system in southern California. The headwaters originate in the San Bernardino Mountains and are discharged to the Pacific Ocean approximately 100 miles to the southwest between Newport Beach and Huntington Beach. The Santa Ana River watershed covers over 2,650 square miles of widely varying forested, rural, and urban terrain and covers the more populated urban areas of San Bernardino, Riverside, and Orange Counties, as well as a lesser portion of Los Angeles County. Disputes over the use of water in the watershed led to the subdivision of the watershed into the Upper Santa Ana River watershed, upstream of Prado Dam, and the Lower Upper Santa Ana River watershed (USARW IRWM 2015).

Water quality in Colton is regulated by the Santa Ana Regional Water Quality Control Board and its Water Quality Control Plan (Basin Plan), which contains water quality standards and identifies beneficial uses (wildlife habitat, agricultural supply, fishing, etc.) for receiving waters along with water quality criteria and standards necessary to support these uses consistent with federal and state water quality laws.

Impacts to water quality of receiving waters generally range over three different phases of a development project:

- During the earthwork and construction phase, when the potential for erosion, siltation, and sedimentation would be the greatest.

- Following construction and before the establishment of ground cover, when the erosion potential may remain relatively high.
- Following project completion, when impacts related to sedimentation would decrease markedly, but those associated with urban runoff would increase.

Following is a discussion of the potential water quality impacts resulting from urban runoff that would be generated during the construction and operational phases of the Project.

Project Construction

Construction-related runoff pollutants are typically generated from waste and hazardous materials handling or storage areas, outdoor work areas, material storage areas, and general maintenance areas (e.g., vehicle or equipment fueling and maintenance, including washing). The Project's construction phase may cause deterioration in the quality of downstream receiving waters if construction-related sediments or pollutants wash into the existing storm drain system and facilities in the area.

Construction-related activities that are primarily responsible for sediment releases are related to exposing previously stabilized soils to potential mobilization by rainfall/runoff and wind. Such activities include removing vegetation from the site, grading the site, and trenching for infrastructure improvements. Environmental factors that affect erosion include topographic, soil, and rainfall characteristics. Non-sediment-related pollutants that are also of concern during construction relate to non-stormwater flows and generally include construction materials (e.g., paint and stucco); chemicals, liquid products, and petroleum products used in the maintenance of heavy equipment; and concrete and related cutting or curing residues. Construction-related activities of the Project would generate pollutants that could adversely affect the water quality of downstream receiving waters if appropriate and effective stormwater and non-stormwater management measures are not used to keep pollutants out of and remove pollutants from urban runoff.

Construction projects of one acre or more are regulated under the Construction General Permit (CGP), Order No. 2009-0009-DWQ as amended by 2010-0014-DWQ and 2012-0006-DWQ. Projects obtain coverage by developing and implementing a SWPPP estimating sediment risk from construction activities to receiving waters and specifying BMPs that would be used by the project to minimize pollution of stormwater. Categories of BMPs used in SWPPPs are described in Table 7.

3. Environmental Analysis

Table 7 Construction Best Management Practices

Category	Purpose	Examples
Erosion Controls	Protects the soil surface and prevents soil particles from being detached by rainfall, flowing water, or wind.	Scheduling, preserving existing conditions, mulch, soil binders, geotextiles, mats, hydroseeding, earth dikes, swales, velocity dissipating devices, slope drains, streambank stabilization, compost blankets, soil preparation/roughening, and non-vegetative stabilization.
Sediment Controls	Traps soil particles after they have been detached and moved by rain, flowing water, or wind.	Barriers such as silt fences, straw bales, sandbags, fiber rolls, and gravel bag berms; sediment basins; sediment traps; check dams; storm drain inlet protection; compost socks and berms; biofilter bags; manufactured linear sediment controls; and cleaning measures such as street sweeping and vacuuming
Wind Erosion Controls	Minimizes dust nuisances.	Applying water or other dust palliatives to prevent or minimize dust nuisance, reducing soil-moving activities during high winds, and installing erosion control BMPs for temporary wind control.
Tracking Controls	Prevents or reduces the tracking of soil offsite by vehicles	Stabilized construction roadways and construction entrances/exits and entrance/outlet tire wash.
Non-storm Water Management Controls	Prevents pollution by limiting or reducing potential pollutants at their source or eliminating offsite discharge. Prohibits illicit connections or discharges.	Water conservation practices, BMPs specifying methods for: dewatering operations; temporary stream crossings; clear water diversions; pile driving operations; temporary batch plants; demolition adjacent to water; materials over water; potable water and irrigation; paving and grinding operations; cleaning, fueling, and maintenance of vehicles and equipment; concrete curing; concrete finishing.
Waste Management and Controls (i.e., good housekeeping practices)	Management of materials and wastes to avoid contamination of stormwater.	Proper material delivery and storage and material use, spill prevention and control, stockpile management, contaminated soil management, and management of solid, concrete, sanitary/septic, liquid, and hazardous wastes.

Source: CASQA 2019.

The Project's construction contractor would be required to prepare and implement a SWPPP and associated BMPs in compliance with the CGP during grading and construction. The SWPPP would specify BMPs, such as those outlined in Table 7, that the construction contractor would implement to protect water quality by eliminating and/or minimizing stormwater pollution prior to and during grading and construction and show the placement of those BMPs. Project construction activities would also be required to implement the requirements of Title 14 (Storm Drain and Floodplain Management) of the Colton Municipal Code.

Adherence to the BMPs in the SWPPP and Colton Municipal Code requirements would reduce, prevent, minimize, and/or treat pollutants and prevent degradation of downstream receiving waters. BMPs identified in the SWPPP would reduce or avoid contamination of stormwater with sediment and other pollutants such as trash and debris; oil, grease, fuels, and other toxic chemicals; paint, concrete, asphalt, bituminous[6] materials, etc.; and nutrients.

Based on the preceding, water quality and waste-discharge impacts from Project grading and construction activities would be less than significant and no mitigation measures are necessary.

Project Operation

Operational-related activities of the Project (e.g., runoff from parking areas, solid waste storage areas, and landscaped areas) would generate pollutants that could adversely affect the water quality of downstream receiving waters if effective measures are not used to keep pollutants out of and remove pollutants from urban runoff.

Standards governing discharges to stormwater from Project operation are set forth in the Municipal Stormwater (MS4) Permit for San Bernardino County in the jurisdiction of the Santa Ana RWQCB, Order No. R8-2010- 0036, NPDES No. CAS618036, issued by RWQCB in 2010. The San Bernardino County Stormwater Control Program issued a Technical Guidance Document for Water Quality Management Plans (TGD) to provide direction to project proponents on the regulatory requirements applicable to a private or public development activity. The TGD includes instructions on selecting BMPs for a project, including low impact development (LID) BMPs, alternatives to LID BMPs in case LID BMPs are impractical on a site, and source control BMPs.

LID is a stormwater management and land development strategy that combines a hydrologically functional site design with pollution prevention measures to compensate for land development impacts on hydrology and water quality. LID techniques mimic the site predevelopment hydrology by using site design techniques that store, infiltrate, evapotranspire, biofilter, or detain runoff close to its source. Source control BMPs reduce the potential for pollutants to enter runoff and are classified in two categories—structural and nonstructural. Structural source control BMPs have a physical or structural component, such as inlet trash racks, trash bin covers, and an efficient irrigation system, to prevent pollutants from contacting stormwater runoff. Nonstructural source control BMPs are procedures or practices used in project operation, such as stormwater training or trash management and litter control practices.

According to the TGD, the Project is a priority project defined as a commercial development of 100,000 square feet or more and a project that creates parking lots of 5,000 SF or more exposed to storm water (SBCSP 2013). Priority projects are required to retain 100 percent of the stormwater design capture volume (DCV)[9] onsite through infiltration, evapotranspiration, stormwater runoff harvest and use, or a combination thereof.

[6] Bituminous materials are materials resembling or containing bitumen; bitumen = any of various viscous or solid impure mixtures of hydrocarbons that occur naturally in asphalt, tar, mineral waxes, etc.; used as a road surfacing and roofing material.

3. Environmental Analysis

To meet the requirements of the MS4 permit and the TGD, and in accordance with Title 14 (Storm Drain and Floodplain Management) of the Colton Municipal Code, the project applicant prepared a preliminary Water Quality Management Plan (WQMP) for City review (Appendix E). The WQMP specifies BMPs that would be implemented to minimize water pollution from the Project Site during the operation phase. BMPs identified in the WQMP include source control measures and stormwater quality control measures. A detailed list of the BMPs and discussion of how they were selected based on their effectiveness to address and mitigate the Project's pollutants of concern are provided in the WQMP. The final BMPs to be implemented for the Project would be determined through the City's review of the final WQMP, which would occur during the City's development review and building plan check process.

The Project Site is mostly undeveloped but is rough graded with slopes from 1 to 3 percent. The site generally slopes from northeast to southwest, with the low point of the site near the intersection of E Santo Antonio Drive and S Mt Vernon Avenue. No buildings or structures exist on the Project Site. There is an existing water line within a public easement that runs along the northerly property line. There is also an existing parking easement, and parking lot for the easterly apartment complex, located at the northeast corner of the site. This parking area is not a part of the Project and would be protected in place. There is also an existing well house with electrical service within easements near the southeast corner of the Project Site. These are also to be protected in place and are not a part of the Project. Since there is no existing storm drain infrastructure on the site, runoff generally flows to the southwest corner into the storm drains in E Santo Antonio Drive (see Figure 7, *Existing Hydrology Map)*. Runoff from the existing parking lot and parking easement in the northeast corner drains easterly and does not drain onto the Project Site.

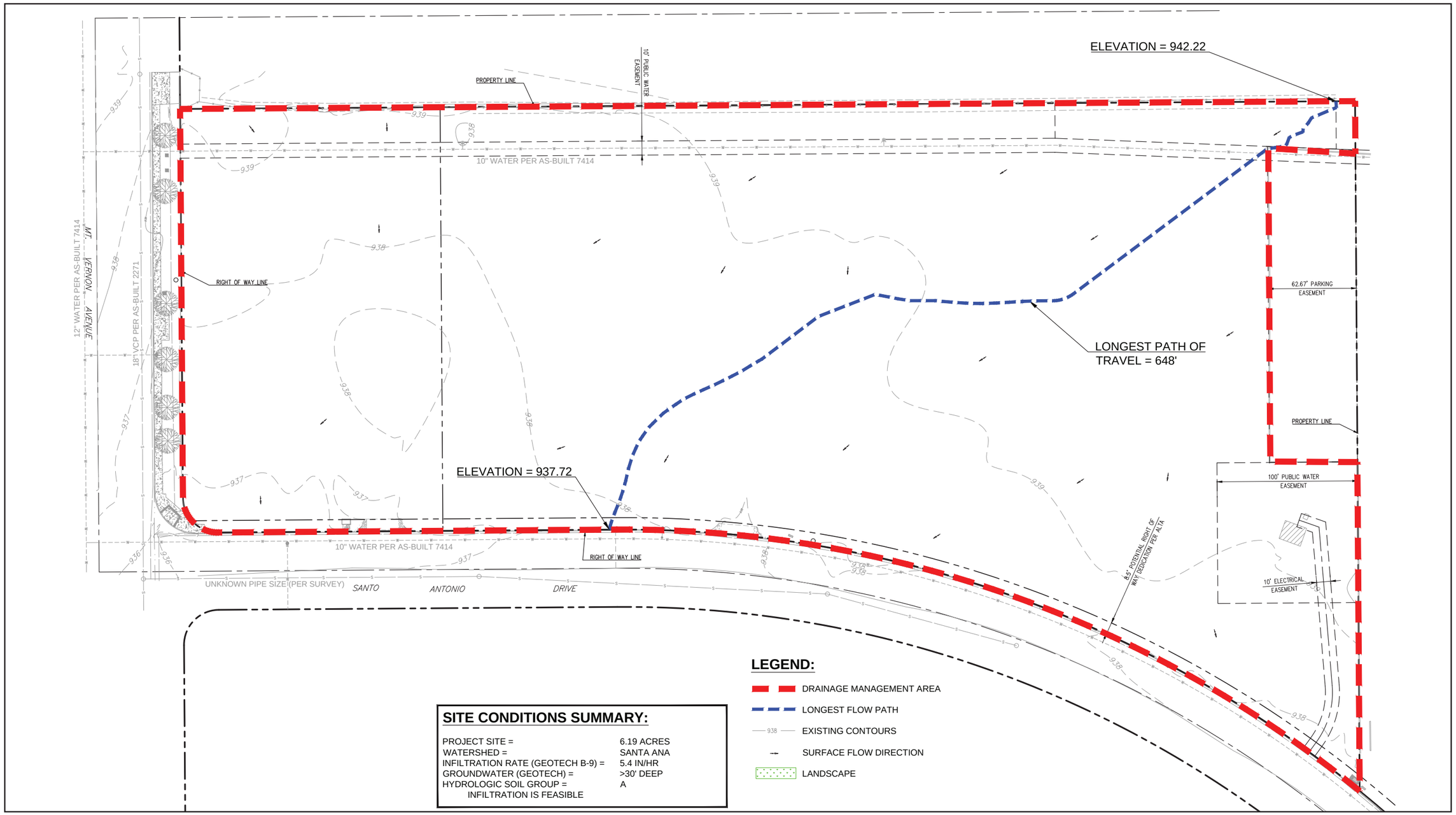
Under proposed conditions and upon Project completion, a series of new valley gutters would convey runoff to the proposed infiltration basin, which is located at the southwest corner of the Project Site (see Figure 8, *Proposed Water Quality Management Plan*). The infiltration basin is designed to infiltrate the design capture volume (DCV)[7], with four overflows that discharge into the existing curb in E Santo Antonio Drive. The curb flows into the existing storm drain in E Santo Antonio Drive. The WQMP calculated a required DCV of 23,685 cubic feet for the Project. The total storage volume for the infiltration basin is 27,306 cubic feet, which exceeds the required storage volume.

Additionally, site-design BMPs, source control BMPs and a BMP Operation and Maintenance Plan are shown in Sections 3.1, 3.2, and 4 of the WQMP (Appendix E). All proposed drainage system improvements will be designed and constructed in accordance with the City's Standards Design Guidelines and would require City approval.

Based on the preceding, no significant water quality and waste-discharge impacts from Project operation activities would occur and no mitigation measures are necessary.

[7] The design capture volume relates to the amount of stormwater runoff that needs to be treated on site per the MS4 Permit requirements.

Figure 7 - Existing Hydrology Map



Source: raSmith, 2021

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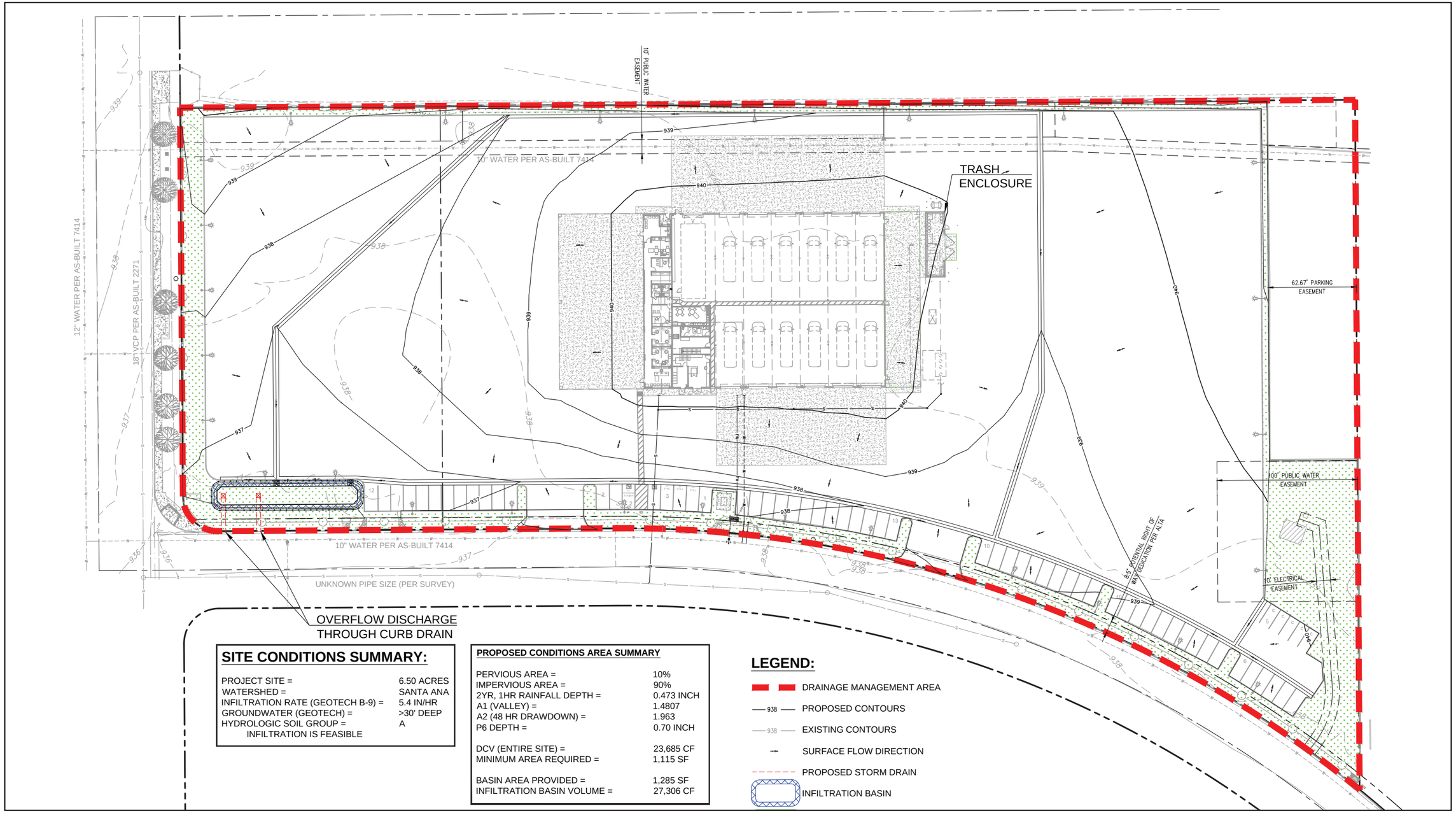
Figure 8 - Proposed Water Quality Management Plan



SITE CONDITIONS SUMMARY:

PROJECT SITE =	6.50 ACRES
WATERSHED =	SANTA ANA
INFILTRATION RATE (GEOTECH B-9) =	5.4 IN/HR
GROUNDWATER (GEOTECH) =	>30' DEEP
HYDROLOGIC SOIL GROUP =	A
INFILTRATION IS FEASIBLE	

PROPOSED CONDITIONS AREA SUMMARY

PERVIOUS AREA =	10%
IMPERVIOUS AREA =	90%
2YR, 1HR RAINFALL DEPTH =	0.473 INCH
A1 (VALLEY) =	1.4807
A2 (48 HR DRAWDOWN) =	1.963
P6 DEPTH =	0.70 INCH
DCV (ENTIRE SITE) =	23,685 CF
MINIMUM AREA REQUIRED =	1,115 SF
BASIN AREA PROVIDED =	1,285 SF
INFILTRATION BASIN VOLUME =	27,306 CF

LEGEND:

- DRAINAGE MANAGEMENT AREA
- 938 PROPOSED CONTOURS
- 938 EXISTING CONTOURS
- SURFACE FLOW DIRECTION
- PROPOSED STORM DRAIN
- INFILTRATION BASIN

0 70
Scale (Feet)

Source: raSmith, 2021

3. Environmental Analysis

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

Less Than Significant Impact. The City of Colton Water Department provides water service to most residents and businesses located within the city's boundary, including the Project Site. Colton's water supply is comprised entirely of groundwater extracted from the Bunker Hill Basin (part of the San Bernardino Basin Area), the Rialto-Colton Basin, and the Riverside-Arlington Basin (Riverside North Basin portion). Colton does not currently import water in order to meet the demands of its service area. Colton currently utilizes three San Bernardino Basin wells, four Rialto-Colton Basin wells, and one Riverside North Basin well. Colton participates in several ongoing water conservation measures and contributes to regional recharge projects through the San Bernardino Basin Groundwater Council and Rialto Basin Groundwater Council to optimize and enhance the reliability of local groundwater resources (WSC 2021).

Colton forecasts that it will have sufficient water supplies to meet water demands in its service area for normal, single-dry, and multiple dry years. As shown in Section 3.19.a, there are adequate water supplies to meet the water demands of the Project and Project development would not require the City to obtain new or expanded water supplies. Therefore, Project development would not substantially deplete groundwater supplies.

Furthermore, the Project Site is not in or near a groundwater recharge area/facility, nor does it represent a source of groundwater recharge.

Therefore, the Project would not substantially interfere with groundwater supplies or recharge. Impacts to groundwater supplies would be less than significant and no mitigation measures are necessary.

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:

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

Less Than Significant Impact. Erosion and siltation impacts potentially resulting from alteration of the drainage pattern due to Project development would, for the most part, occur during the Project's construction phase, which would include site preparation and grading activities. Environmental factors that affect erosion include topographic, soil, and wind and rainfall characteristics. Siltation is most often caused by soil erosion or sediment spill. Following is a discussion of the potential erosion and siltation impacts that could occur during the construction and operational phases of the Project.

Project Construction

As discussed above in Section 3.10.a, the Project construction contractor would be required to prepare and implement a SWPPP pursuant to the CGP during grading and construction. The SWPPP would specify erosion- and sediment-control BMPs that the Project construction contractor would implement prior to and during grading and construction to minimize erosion and siltation impacts on- and offsite. Erosion-control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap

or filter sediment once it has been mobilized. BMPs that would be implemented during the Project's construction phase are discussed in detail in Section 3.10.a. For example, BMPs would include but are not limited to installation of perimeter silt fences, installation of silt fences around stockpile and covering of stockpiles, and stabilization of disturbed areas where construction ceases for a determined period of time (e.g., one week) with erosion controls.

Adherence to the BMPs in the SWPPP would reduce, prevent, or minimize soil erosion from Project-related grading and construction activities. The construction-phase BMPs would also ensure effective control of not only sediment discharge, but also of pollutants associated with sediments (e.g., nutrients, heavy metals, and certain pesticides).

Therefore, Project-related construction activities would not result in substantial erosion or siltation on- or offsite. Construction-related impacts would be less than significant and no mitigation measures are necessary.

Project Operation

As shown in Figure 3, *Aerial Photograph*, the Project Site is mostly undeveloped but is rough graded with slopes from 1 to 3 percent. Under the Project, there would be no bare or disturbed soil onsite at Project completion that would be vulnerable to erosion or siltation. All areas would either be buildings, paved, or landscaped.

The topography of the site is relatively flat (1 to 3 percent slope) and slopes from the northeast to southwest. Under existing conditions, runoff sheet flows from the northeast to the southwest into storm drains in E Santo Antonio Drive (see Figure 7, *Existing Hydrology Map*). Runoff from the existing parking lot and parking easement in the northeast corner drains easterly and does not drain onto the Project Site.

Project development, a series of new valley gutters would convey runoff to the proposed infiltration basin, which is located at the southwest corner of the Project Site (see Figure 8, *Proposed Water Quality Management Plan*). The infiltration basin is designed to infiltrate the DCV with any overflow discharging to the existing street flowline in E Santo Antonio Drive. Project development would not substantially alter the existing drainage pattern of the site area and would not alter the course of a stream or a river.

Additionally, the Project would be implemented in accordance with the WQMP and abide by the requirements of the MS4 permit and the TGD. For example, Project design and operation would include implementation of BMPs specified in the WQMP, which would minimize runoff and soil erosion and siltation into stormwater and thus minimize sedimentation downstream.

Furthermore, Project development would be required to comply with the standards of Title 14 (Storm Drain and Floodplain Management) of the Colton Municipal Code, which requires development projects to implement permanent BMPs on individual sites to reduce pollutants in the stormwater.

Therefore, Project development would not substantially alter the existing drainage pattern of the site or area in a manner that would result in substantial erosion or siltation on- or offsite. Operation-related impacts would be less than significant and no mitigation measures are necessary.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Less Than Significant Impact. As mentioned in Section 3.10.c.i, under existing conditions, runoff from the sites flows into storm drains in E Santo Antonio Drive. Project implementation is not anticipated to substantially change the drainage pattern onsite or substantially increase the rate or amount of runoff. Under proposed conditions, runoff from the site would be conveyed like existing conditions, into the storm drain in E Santo Antonio Drive.

The Project was designed to meet the requirements of the San Bernardino County Hydrology Manual with new infrastructure sized to meet the 100-year peak flows. The existing system was also analyzed with the intent to reduce post-development 100-year peak flows to match existing conditions. The 100-year peak flow rate under existing conditions is 1.73 cubic feet per second and the peak runoff volume is 90,849 cubic feet. For the Project, the projected peak flow rate is 13.82 cubic feet per second and the projected volume is 95,070 cubic feet. However, the infiltration basin would provide volume storage to aide in reducing the post-development runoff volume to match the existing volume. The infiltration basin has a volume capacity of 27,306 cubic feet which can accommodate the 4,221 cubic feet excess volume associated with the post-development 100-year storm event (Appendix F).

As proposed, post development runoff from the Project Site would be adequately handled by the Project's drainage system and would not exceed the capacity of existing or planned stormwater drainage systems or substantially alter the existing drainage pattern of the Project Site or area in a manner that would result in flooding on- or offsite. Therefore, Project impacts would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. The following describes potential impacts related to storm drainage systems and runoff.

Capacity of Stormwater Drainage Systems

Project impacts on the capacity of storm drainage systems would be less than significant, as substantiated in Section 3.10.c.ii, above. No mitigation measures are necessary.

Polluted Runoff

Project stormwater pollution impacts would be less than significant, as substantiated in Section 3.10.a, above. No mitigation measures are necessary.

iv) Impede or redirect flood flows?

No Impact. The Project Site is not within a Federal Emergency Management Agency (FEMA) 100-year flood hazard zone. The Project Site is within Zone X defined as an area within a 500-year flood hazard

zone, or within a 100-year flood hazard zone with an average flooding depth of less than one, or within a drainage area of less than one square mile. The Reche Canyon Channel borders the site to the north; however, the 100-year flood would be contained within the channel (FEMA 2016). The Project Site is also not within the inundation zone of any dams (DWR 2021). Therefore, no impact would occur and no mitigation measures are necessary.

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

No Impact. As noted in Section 3.10.c.iv, above, the Project Site is site is not in a 100-year flood zone or a dam inundation zone.

A seiche is an oscillating surface wave in a restricted or enclosed body of water, generated by ground motion, usually during an earthquake. Seiches are of concern for water storage facilities, because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. There are no adjacent bodies of water that would pose a flood hazard to the site due to a seiche. The Project Site is not at risk of inundation by seiche.

Tsunamis are a type of earthquake-induced flooding produced by large-scale sudden disturbances of the sea floor. Tsunami waves interact with the shallow sea floor when approaching a landmass, resulting in an increase in wave height and a destructive wave surge into low-lying coastal areas. The Project is approximately 46 miles inland from the Pacific Ocean. Therefore, the site is outside the tsunami hazard zone and would not be affected by a tsunami.

Based on the preceding, the Project would not risk release pollutants as the result of floods, tsunami, or seiche. Therefore, no impact would occur and no mitigation measures are necessary.

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

No Impact. Water quality in Colton is regulated by the Santa Ana RWQCB's Santa Ana River Basin Water Quality Control Plan. The basin plan contains water quality standards and identifies beneficial uses (wildlife habitat, agricultural supply, fishing, etc.) for receiving waters along with water quality criteria and standards necessary to support these uses consistent with federal and state water quality laws. As discussed in Section 3.10.a, above, the Project would not violate any water quality standards and will therefore not obstruct the implementation of the Basin Plan. Therefore, no impact would occur and no mitigation measures are necessary.

Additionally, the Project Site is in the Riverside-Arlington groundwater basin which is a very low priority groundwater basin. A basin's priority determines which provisions of the Sustainable Groundwater Management Act (SGMA) apply. SGMA requires medium- and high-priority basins to develop groundwater sustainability agencies, develop groundwater sustainability plans (GSP) and manage groundwater for long-term sustainability. The Riverside-Arlington groundwater basin does not require a GSP. Therefore, no impact would occur and no mitigation measures are necessary.

3.11 LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

No Impact. The Project involves development of a Gian RV facility on an undeveloped site (see Figures 3, *Aerial Photograph*, and 4, *Conceptual Site Plan*). The Project would not introduce a physical barrier that would separate land uses that are not already separated. Connections between residential and nonresidential uses surrounding the Project Site would remain and not be impeded or impacted in any way. Except for new driveways accessing the southern portion of the Project Site, the Project would not physically change or disrupt the surrounding street patterns or otherwise impede movement through them.

Additionally, while there are established residential and nonresidential uses surrounding the Project Site, Project development would not physically divide these uses in any way because the Project would be developed within the confines of the Project Site and would not introduce roadways or other infrastructure improvements that would bisect or transect the residential communities. Furthermore, the Project would not introduce a new land use that would disrupt existing land use patterns. The Project's proposed commercial use is compatible with the uses surrounding the Project Site.

Therefore, no impact would occur and no mitigation measures are necessary.

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?

No Impact. The City enforces numerous goals, policies, and regulations related to the purpose of avoiding or mitigating an environmental effect. The prevailing planning and regulatory plans that govern development and use of the Project Site are the Colton General Plan and Zoning Ordinance (Chapter 18 of the Colton Municipal Code). The development and design standards and regulations in the Colton Zoning Ordinance implement the Colton General Plan and constitute the zoning regulations that govern development of the Project Site. Following is an analysis of the Project's consistency with these adopted land use regulations.

General Plan Consistency

The Colton General Plan land use designation of the Project Site is General Commercial. As stated in the Land Use Element of the Colton General Plan, allowed uses include a variety of retail and commercial services, including auto services. Therefore, the Project's proposed commercial auto service use is a permitted uses under the General Commercial designation.

Additionally, as shown in Figure 3, *Aerial Photograph*, the Project Site is in urbanized area of Colton and is surrounded by a mix of commercial, retail, office, retail and residential uses. The Project would not alter or represent a change in land use patterns or an inconsistency with adopted land use plans. Furthermore, Project development does not include or require any amendments to the Colton General Plan.

Therefore, Project implementation would not conflict with the Colton General Plan. No land use impact related to general plan consistency would occur and no mitigation measures are necessary.

Zoning Ordinance Consistency

Per the City's zoning map, the site zoned General Commercial (C-2) with Business District Sign Overlay. The General Commercial designations permit a wide range of retail and commercial services, including auto services. Project development and operation would require City approval of a conditional use permit, pursuant to the provisions of Section 18.06.060 (Uses Permitted in each Zone) of the Colton Zoning Ordinance. With City approval of the conditional use permit, the Project would be consistent with the General Commercial zoning district of the Project Site.

Additionally, Project development does not include or require zoning amendment or zone change; nor would it require a variance or any adjustments from the City's zoning standards, which help ensure that development projects in the city are designed and implemented in a manner that is not detrimental to the Project Site or its surroundings. The Project has been designed and would be developed in accordance with all applicable development and design standards of the Colton Zoning Ordinance, including those related to building height and setbacks, building and site plan design, landscaping, and parking. Compliance with the applicable development and design standards would be ensured through the City's development review process.

Therefore, no land use impact related to zoning consistency would occur and no mitigation measures are necessary.

3.12 MINERAL RESOURCES

Would the project:

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

No Impact. The Project Site is in an area classified as MRZ-2, which are areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for the presence (CDC 2015). However, the Project Site is not in a mineral resource sector (CGS 2008, 1994). Additionally, the Project Site consists of undeveloped land (see Figure 3, *Aerial Photograph*) and is not used and has never been used for mining; no locally important mineral resource recovery sites are on or near the Project Site. Additionally, according to the Division of Mine Reclamation, there are no mines on the Project Site (CDC 2016b). Also, the Project Site does not support and has never supported mineral extraction operations. Further, mining on the Project Site would be incompatible with the surrounding uses, which consists mostly of commercial, retail and residential uses. Mining is also not a permitted use under the site's General Plan land use or zoning designations of the Project Site.

Furthermore, no mining sites are designated in the City of Colton General Plan, and the nearest mine to the site mapped on the Mines Online website is over 1.5 miles away (DMR 2022).

Finally, no oil or energy extraction and/or generation activities exist on the Project Site. A review of California Geologic Energy Management Division's well finder indicates that there are no oil or energy wells located on or within proximity of the Project Site (CalGEM 2022).

Based on the preceding, no impact to mineral resources or mineral resource recovery sites would occur and no mitigation measures are necessary.

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?

No Impact. See response to Section 3.12.a, above. As substantiated in this section, no impact would occur and no mitigation measures are necessary.

3.13 NOISE

Noise Fundamentals

Noise is defined as unwanted sound and is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Based on these known adverse effects of noise, the federal, state, and city governments have established criteria to protect public health and safety and to prevent the disruption of certain human activities, such as classroom instruction, communication, or sleep. Additional information on noise and vibration fundamentals and applicable regulations are contained in Appendix G.

Environmental Setting

The Project Site is an undeveloped parcel with multifamily residences to the east, California Preparatory College to the north, and commercial and retail uses to the west and south (see Figure 3, *Aerial Photograph*). Other uses in the project vicinity include additional residences further west and Summit College to the northwest.

The Project Site is within a quarter mile of I-215 and is primarily characterized by traffic noise from surrounding roadways. To establish existing conditions, traffic noise modeling was conducted using the Federal Highway Administration (FHWA) traffic noise prediction model. FHWA model uses average daily traffic volumes, vehicle mix, and day, evening, and night percentage splits. This data was obtained from the Caltrans Traffic Census Program. Table 8 shows the existing CNEL at 50 feet and the distance to the 60, 65, and 70 dBA CNEL contours from I-215. The results of modeling indicate that the Project Site is mostly within the 60 dBA CNEL freeway noise contour.

Table 8 Existing Traffic Noise Levels

Roadway Segment	Existing ADT	CNEL (dBA) at 50 feet	Distance to CNEL Contour (feet)		
			70 dBA	65 dBA	60 dBA
Interstate 215 – north of Washington Street	200,000	86.6	636	1,370	2,951
Interstate 215 – south of State Route 10	186,000	86.2	606	1,305	2,811

Source: Caltrans 2019 and 2020.

Additionally, it should be noted that per the *CBIA v. BAAQMD* ruling, it is generally no longer the purview of the CEQA process to evaluate the impact of existing environmental conditions on any given project. As a result, while the noise from existing sources is taken into account as part of the baseline, the direct effects of exterior noise from nearby noise sources relative to land use compatibility of a future project is typically no longer a required topic for impact evaluation under CEQA. Generally, no determination of significance is required with the exception of certain school projects, projects affected by airport noise, and projects that would exacerbate existing conditions (i.e., projects that would have a significant operational impact).

Sensitive Receptors

Certain land uses are particularly sensitive to noise and vibration. These uses include residences, schools, hospital facilities, houses of worship, and open space/recreation areas where quiet environments are necessary for the enjoyment, public health, and safety of the community. The nearest sensitive receptors to the Project Site are the multi-family residences to the east and California Preparatory College to the north. Other residential uses include the multi-family residences to the west and Summit College to the northwest.

Applicable Standards

City of Colton Noise Regulations

The City has set forth an exterior noise limit throughout Colton. Section 18.42.040 (Noise) of the Colton Zoning Ordinance (Chapter 18 of the Colton Municipal Code) states that the maximum sound level radiated when measured at the boundary line of the property on which the sound is generated, shall not be obnoxious by reason of its intensity, pitch or dynamic characteristics as determined by the City, and shall not exceed 65 dBA.

Section 18.42.050 (Vibration) of the Colton Zoning Ordinance states that activities shall be operated so as not to generate ground vibration by equipment which is perceptible without instruments by the average person at or beyond any lot line of the lot containing the activities except for motor vehicles, trains or by temporary construction or demolition.

Federal Transit Administration

The City does not have quantified thresholds for construction noise and vibration. The Federal Transit Administration (FTA) provides a daytime construction noise criterion of 80 dBA Leq and a groundborne vibration criteria in inches per second peak particle velocity (in/sec PPV) for various types of buildings.

Vibration criteria is summarized by building category, as shown in Table 9. FTA's construction noise and vibration criteria were used to determine the Project's impact significance.

Table 9 Groundborne Vibration Criteria Architectural Damage

Building Category	PPV (in/sec)
I. Reinforced concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

Source: FTA 2018.
Notes: PPV = peak particle velocity; in/sec = inches per second

Would the project result in:

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

Less Than Significant Impact. Following is a discussion of the temporary and permanent noise impacts as a result of the Project's construction and operational phases.

Construction Noise

The total duration for Project construction is anticipated to be approximately 12 months beginning in summer of 2022. Two types of short-term noise impacts could occur during construction: (1) mobile-source noise from transport of workers, material deliveries, and debris and soil haul and (2) stationary-source noise from use of construction equipment.

Construction Vehicles

The transport of workers and materials to and from the construction site would incrementally increase noise levels along site access roadways. Site access would be through S Mt Vernon Avenue onto E Santo Antonio Drive. Project development would generate a maximum of approximately 236 daily worker/vendor trips during overlapping building construction, fine grading, paving, and architectural coating phases. Individual construction worker and vendor trips may temporarily increase roadway traffic noise. However, these increases would be minimal and short-lived and not substantially nor permanently increase the existing ambient.

Construction Equipment

Noise generated by onsite construction equipment is based on the type of equipment used, its location relative to sensitive receptors, and the timing and duration of noise-generating activities. Each stage of construction involves different kinds of equipment and has distinct noise characteristics. Noise levels from construction activities are typically dominated by the loudest equipment. The dominant equipment noise

source is typically the engine, although work-piece noise (such as dropping of materials) can also be noticeable.

The noise produced at each construction stage is determined by combining the Leq contributions from each piece of equipment used at a given time, while accounting for the ongoing time-variations of noise emissions. Heavy equipment, such as a dozer or a loader, can have maximum, short-duration noise levels of up to 85 dBA at 50 feet. However, overall noise emissions vary considerably, depending on the specific activity performed at any given moment. Noise attenuation due to distance, the number and type of equipment, and the load and power requirements to accomplish tasks at each construction phase would result in different noise levels from construction activities at a given receptor. Since noise from construction equipment is intermittent and diminishes at a rate of at least 6 dBA per doubling of distance (conservatively ignoring other attenuation effects from air absorption, ground effects, and shielding effects), the average noise levels at noise-sensitive receptors could vary considerably, because mobile construction equipment would move around the site with different loads and power requirements.

Average noise levels from Project-related construction activities are calculated by modeling the three loudest pieces of equipment per activity phase. Equipment for grading and site preparation is modeled at spatially averaged distances (i.e., from the acoustical center of the general construction site to the property line of the nearest receptors) because the area around the center of construction activities best represents the potential average construction-related noise levels at the various sensitive receptors for mobile equipment. Similarly, construction noise from paving activities is modeled from the center of proposed paving areas. Equipment for building construction and architectural coating is modeled from the edge of the proposed building to the nearest sensitive receptors. Lastly during finish and landscaping, minimal equipment is used and could occur near the edge of the Project Site. Minimal equipment would be used for this activity and equipment could be within 50 to 275 feet of the surrounding receptors.

The Project's expected construction equipment mix was categorized by construction activity using the FHWA Roadway Construction Noise Model (RCNM). The associated, aggregate sound levels—grouped by construction activity—are summarized in Table 10. RCNM modeling input and output worksheets are included in Appendix G. As shown in Table 10, construction-related noise levels would not exceed the 80 dBA Leq threshold at the nearest sensitive receptors. Therefore, construction-equipment noise impacts would be considered less than significant and no mitigation measures are necessary.

Table 10 Project-Related Construction Noise Levels, dBA L_{eq}

Activity Phase	RCNM Reference Noise Level	California Preparatory College to North	Residences to East	Summit College to Northwest
Distance in feet	50	275	375	680
Site Preparation	84	69	67	61
Rough Grading	82	68	65	60
Fine Grading	83	68	65	60
Distance in feet	50	215	290	600
Building Construction	83	70	67	61
Architectural Coating	74	61	58	52
Distance in feet	50	135	145	500
Paving	84	75	74	64
Distance in feet	50	150	50	275
Finish and Landscaping	77	67	77	62

Notes: Calculations performed with the FHWA RCNM software are included in Appendix G.

Operational Noise

Mobile Noise

A project will normally have a significant effect on the environment related to noise if it will substantially increase the ambient noise levels at adjoining areas. Most people can detect changes in sound levels of approximately 3 dBA under normal, quiet conditions, and changes of 1 to 3 dBA are detectable under quiet, controlled conditions. Changes of less than 1 dBA are usually indiscernible. A change of 5 dBA is readily discernible to most people in an exterior environment. Based on this, the following thresholds of significance, similar to those recommended by the Federal Aviation Administration (FAA), are used to assess traffic noise impacts at sensitive receptor locations. A significant impact would occur if traffic noise increase would exceed:

- 1.5 dBA in ambient noise environments of 65 dBA CNEL and higher.
- 3 dBA in ambient noise environments of 60 to 64 dBA CNEL.
- 5 dBA in ambient noise environments of less than 60 dBA CNEL.

For reference, doubling a noise source results in a 3 dBA increase. Therefore, an increase in traffic trips by 100 percent above existing would result in a 3 dBA increase and an increase in traffic trips by approximately 40 percent would result in 1.5 dBA noise increase. Project development would generate up to 4 peak hour truck trips (RV deliveries) and 17 peak hour passenger vehicle trips. The Project's access roadway segments include S Mt Vernon Avenue, north and south and E Santo Antonio Drive, and E Santo Antonio Drive, east of S Mt Vernon Avenue. The latest counts available and provided by the City are:

- 2006 counts along S Mt Vernon Avenue, north and south of E Santo Antonio Drive when adjusted to the year 2021 with a one percent cumulative growth rate are 2,042 peak hour trips.

- 2020 counts along E Santo Antonio Drive, east of S Mt Vernon Avenue when adjusted to the year 2021 with a one percent cumulative growth rate are 558 peak hour trips.

Addition of the Project's 21 total peak trips (trucks and passenger vehicles) when compared to 558 peak hour trips, conservatively, would result in a noise increase of less than 0.5 dBA. Therefore, impacts would be less than significant and no mitigation measures are necessary.

Ventilation Noise

The proposed heating, ventilation, and air conditioning (HVAC) systems are rooftop units (RTU's) and would be installed on the western side of the proposed building. Similarly, the paint booth and service bays would have rooftop ventilation ducts. Typical HVAC equipment generates noise levels ranging up to 72 dBA at distance of 3 feet. The nearest sensitive receptor to the RTU's and ventilation duct are the California Preparatory College to the north and residences to the east. Both are over 200 feet away. At a distance of 200 feet, HVAC noise levels would attenuate to 36 dBA or less and would not exceed the City's exterior daytime and nighttime noise standard of 65 dBA. Therefore, impacts would be less than significant and no mitigation measures are necessary.

Giant RV Operational Noise

An outdoor RV wash area is proposed next to the proposed building (east side of building). The nearest receptors to the proposed wash area would be over 200 feet to the north and east. All washing activities would be manual and no carwash tunnel with blowers would be installed. Noise from hand washing and drying the RV's would be minimal and would not substantially increase the existing noise ambient at the nearest noise sensitive receptors.

Other operations, as described in the project description, include full inspections, possibly some minor body work (e.g., touch-up painting, dent removal) if needed, minor repairs, and preparation of the RV to be shipped off to a Giant RV dealership in the region. These inspections and minor repairs would occur within the enclosed service bays and noise would be fully shielded.

Therefore, impacts would be less than significant and no mitigation measures are necessary.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact With Mitigation Incorporated. Following is a discussion of the Project's temporary and permanent vibration impacts as a result of the Project's construction and operational phases.

Operational Vibration

Project operation would not include any substantial long-term vibration sources. Therefore, no significant vibration effects would occur. Impacts would be less than significant and no mitigation measures are necessary.

Construction Vibration

Construction operations can generate varying degrees of ground vibration, depending on the construction procedures and equipment. Operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. The effect on buildings in the vicinity of the construction site varies depending on soil type, ground strata, and receptor-building construction. The effects from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Vibration from construction activities rarely reaches the levels that can damage structures.

For reference, a vibration level of 0.2 inches per second (in/sec) peak particle velocity (PPV) is used as the limit for non-engineered timber and masonry buildings, which is conservatively applied to the surrounding structures (FTA 2018). To determine potential vibration-induced architectural damage, the distance from vibration sources (construction equipment) is measured from the edge of the construction site to the nearest building/structure façade. Vibration-induced architectural damage is assessed in terms of peak velocity (PPV). Table 11 summarizes PPV levels for typical construction equipment at the nearest receptors.

Table 11 Vibration Damage Levels for Typical Construction Equipment

	PPV (in/sec)		
Equipment	FTA Reference at 25 feet	Structure to East at 10 Feet	Structure to East at 15 Feet
Vibratory Roller	0.21	0.830	0.452
Static Roller[1]	0.05	0.198	0.108
Large Bulldozer	0.089	0.352	0.191
Caisson Drilling[2]	0.089	NA	NA
Loaded Trucks	0.079	NA	NA
Jackhammer[2]	0.035	NA	NA
Small Bulldozer	0.003	0.012	0.006

Source: FTA 2018.
Notes: NA = Not Applicable
[1] New Zealand Transport Agency 2012.
[2] Not applicable. Not proposed within 15 feet of sensitive receptors.

Paving and grading activities could occur within 10 to 15 feet of an existing carport structure (associated with the adjacent apartment complex) near the northeastern Project Site boundary. As shown in Table 11, vibration from a vibratory roller and large bulldozer could exceed 0.20 in/sec PPV at 10 and 15 feet. Therefore, impacts would be potentially significant. However, with implementation of Mitigation Measure NOI-1, Project-related construction vibration impacts would be reduced to a less-than-significant level. Specifically, use of a static roller is estimated to generate vibration levels less than 0.20 in/sec PPV at a distance of 10 feet (see Table 11). Earthwork equipment used for grading shall be limited to equipment with 100 horsepower or less as detailed Mitigation Measures NOI-1.

The next closest receptors are commercial buildings to the south approximately 70 feet from the edge of construction. At distances greater than 25 feet, vibration levels would attenuate to less than 0.20 in/sec PPV and impacts at those receptors would be less than significant.

Mitigation Measures

NOI-1 The following measures shall be implemented by the project applicant and construction contractor during grading and paving activities:

- Vibratory compaction that is within 10 to 15 feet of any surrounding structure shall use a static roller in lieu of a vibratory roller. At a distance greater than 10 feet or greater a static roller would no longer exceed 0.20 inches per second peak particle velocity.
- Grading and earthwork activities within 10 to 15 feet of any surrounding structure shall be conducted with off-road equipment that is limited to 100 horsepower or less.

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?

No Impact. The nearest airport to the Project Site is the San Bernardino International Airport, approximately four miles northeast of the Project Site. The Project would not expose people working in the project area to excessive aircraft noise levels. Therefore, no impact would occur and no mitigation measures are necessary.

3.14 POPULATION AND HOUSING

Would the project:

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

No Impact. The Project does not include the development of new homes, which would result in a direct growth in population. As shown in Figure 4, *Conceptual Site Plan*, the Project involves the development of a new commercial building and features needed for a RV preparation and repair business. Additionally, the proposed commercial use would not cause population growth in and of itself. Furthermore, the Project would create employment opportunities (both during the construction and operational phases). However, it is anticipated that employees from the local workforce would be hired during both the construction and operational phases of the Project. The Project is not of the scope or scale to induce people to move from out of the project area to work at the Project Site. Finally, the Project Site is also provided with adequate road access and utilities, and Project development would not require extension of roadways, utilities or other infrastructure. Therefore, no impact to population and housing would occur and no mitigation measures are necessary.

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

No Impact. As shown in Figure 3, *Aerial Photograph*, the Project Site consists of undeveloped land and no buildings, including housing, exists onsite. Therefore, Project development would not displace people or housing. No impact would occur and no mitigation measures are necessary.

3.15 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:

a) Fire protection?

Less Than Significant Impact. Fire protection and emergency services in Colton, including the Project Site, are provided by the Colton Fire Department (CFD). CFD's operations include fire suppression, emergency medical services, light and heavy rescue, and hazardous materials mitigation. CFD comprises three divisions: administration, operations, and emergency medical services. It also has a number of special teams, including Special Weapons and Tactical (SWAT) paramedics (a coordinated effort between CFD and the Colton Police Department), Honor Guard, and Arson Investigation Unit. CFD employs 41 uniformed personnel, including fire chiefs, battalion chiefs, fire captains, engineers, and firefighter/paramedics. 12 firefighter staff each of the City's four fire stations, in addition to the Fire Chief, Battalion chief, and administrative support staff. The closest fire station to the Project Site is Station No. 214 at 1151 South Meadow Lane, approximately 0.42 mile east of the Project Site. This station is staffed by a captain, engineer, and firefighter/paramedic. The facility is also equipped with one fire engine (CFD 2022).

Upon implementation of the Project, the RV facility would be developed with a commercial building and parking area. The facility may increase the number of fire services calls, such as for structure fires, electrical fires, and medical emergencies. However, considering the existing firefighting resources available at Station No. 214, adverse impacts on CFD services are not expected to occur. The increase in fire service demand generated by the Project would not require the construction of a new fire station or improvements to or expansion of Station No. 214.

Additionally, the Project Site is surrounded by a mix of commercial, retail, office and residential uses that are already served by CFD; therefore, the Project would not result in an expansion of CFD's service area. Also, in the event of an emergency at the Project Site that requires more resources than Station No. 214 could provide, CFD would direct resources to the site from other CFD stations nearby, including CFD Headquarters, located 1.36 miles northwest, and Station No. 213, located 1.34 miles west.

The City also involves CFD in the development review process in order to ensure that the necessary fire prevention and emergency response features are incorporated into development projects. The Project would incorporate such design features to minimize the potential demand placed on CFD. For example, the

proposed building would feature monitored fire sprinkler and alarm systems. Fire hydrants would also be installed at key locations onsite (along the southern and northern site boundaries), as required by CFD. The fire hydrants would connect to the new onsite water lines with fire sufficient flows supplied by the City. Additionally, the adequacy of existing water pressure and water availability in the project area would be verified by CFD during the Project's plan check review process. All site and building improvements proposed as a part of the Project would be subject to review and approval by the City and CFD prior to issuance of a building permit and occupancy permit.

Furthermore, Project development is required to comply with the most current adopted fire codes, building codes, and nationally recognized fire and life safety standards of the City and CFD, as outlined in Chapter 15.16 (Fire Code) of the Colton Municipal Code. Compliance with these codes and standards would be enforced through the City's development review and building plan check process.

Development impact fees are also required by the City for all development projects. Development impact mitigation fees for fire services for commercial uses are $211 per 1,000 square feet of building area (Colton 2020). Revenue from impact fees is used toward future acquisition and construction of new fire facilities and equipment purchases. Payment of these fees would ensure that project applicants pay their fair share of costs related to fire protection and emergency services and facilities.

Therefore, compliance with current fire and building codes in the City's municipal code, payment of development impact fees, and compliance with the following conditions of approval would ensure that Project implementation would not result in substantial adverse impacts related to fire protection and emergency services. Thus, impacts would be less than significant and no mitigation measures are necessary

b) Police protection?

Less Than Significant Impact. The City of Colton Police Department (CPD) provides police protection services for the entire city, including the Project Site. CPD's headquarters is at 650 North La Cadena Drive, approximately 1.46 miles northwest of the Project Site. The department comprises two divisions: Administration Division and Operations Division. The Operations Division consists of detectives, the Honor Guard, K-9 Unit, traffic police, and citizen volunteers. Overall, CPD has 57 sworn officers and 40 non-sworn employees (CPD 2022). As of 2013, CPD is also equipped with 27 patrol vehicles, an armored rescue vehicle, a mobile command post, tactical equipment, off-road enforcement vehicles, traffic enforcement vehicles, and two police canines (Colton 2013).

Upon implementation of the Project, the Project Site would be developed with an RV preparation and repair facility consisting of a commercial building and parking area. The proposed facility could increase demand of police protection services for potentially additional crime and accidents. Crime and safety issues during construction activities may include theft of building materials and/or construction equipment, mischief, graffiti, and vandalism. During operation, the Project is anticipated to generate a typical range of police service calls, such as vehicular burglaries or thefts and disturbances.

Typically, impacts on police services analyzed based on increases in permanent residents from projects involving residential developments. The proposed RV facility would introduce only temporary workers during

standard work hours and drivers using the facility between destinations. Therefore, it is unlikely that the temporary population would trigger the need for new or expanded police facilities. Additionally, because the Project Site is surrounded by other established uses, including commercial office and residential uses, the Project would not require an expansion of CPD's existing service area.

Additionally, development impact fees are required by the City to mitigate potential impacts on police services. As a commercial use, the project applicant would be required to pay $276 per 1,000 square feet of building area (Colton 2020). Revenue from impact fees is used toward future acquisition and construction of new police facilities and equipment purchases. Payment of these fees would ensure that project applicants pay their fair share of costs related to police protection services and facilities.

Overall, Project implementation would not adversely impact the CPD's police protection services. Therefore, impacts would be less than significant and no mitigation measures are necessary.

c) Schools?

Less Than Significant Impact. Colton Joint Unified School District provides school services in Colton and a few neighboring cities, including Rialto, Fontana, Bloomington, Grand Terrace, Loma Linda, and San Bernardino. The increase in student generation and the need for new or the expansion of existing school facilities is tied to population growth. The Project would not result in land uses (e.g., housing) that would result in population growth or create a greater demand for school services. Therefore, Project development would not generate an increase in the student population in the area, nor result in the need for new or expanded school facilities.

Additionally, the need for additional school services and facilities is addressed by compliance with school impact assessment fees per Senate Bill 50, also known as Proposition 1A. SB 50—codified in California Government Code Section 65995—was enacted in 1988 to address how schools are financed and how development projects may be assessed for associated school impacts. The project applicant would be required to pay school impact fees to reduce any impacts to the school system, in accordance with SB 50. These fees are collected by school districts at the time of issuance of building permits.

Therefore, no impact would occur and no mitigation measures are necessary.

d) Parks?

No Impact. See response to Section 3.16.a, below. As substantiated in that section, no impact would occur and no mitigation measures are necessary.

e) Other public facilities?

No Impact. The City provides library services for its residents through two library facilities, the Colton Public Library Main Branch and the Luque Branch Library. The main library, which is 1.44 miles to the northwest of the Project Site, is a 10,600-square-foot facility with approximately 70,000 collection items (Colton 2022a). The Luque Branch Library is about 0.83 mile from the Project Site. In addition, the City has an Advance to Literacy Center/Homework Assistance Center at the historic Carnegie Building.

The need for new or the expansion of existing library services and facilities is tied to population growth. No residential development is proposed as a part of the Project, and Project development is not expected to generate a need for new or additional library services or facilities. The Project would introduce workers during standard work hours as a part of the proposed commercial use. Nevertheless, the City imposes development impact fees to mitigate potential impacts on library services even for commercial developments—$125 per 1,000 square feet of building area for commercial uses (Colton 2020). Therefore, no impacts would occur and no mitigation measures are necessary.

3.16 RECREATION

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

No Impact. The City provides parks and recreational services to its residents. Twelve parks and four community centers are located throughout the city. The closest parks to the are the Susan Petta Park and Veterans Park, approximately 0.76 mile southwest and northwest of the Project Site, respectively. The Santa Ana River Trail is also approximately 0.3 mile west of the Project Site.

The increase in the use of existing parks and recreational facilities and the need for new or the construction or expansion of existing recreational facilities is tied to population growth. No residential development is proposed as a part of the Project; therefore, the Project would not directly induce population growth. Also, the proposed RV facility would only introduce a temporary population of onsite employees during standard work hours. It is unlikely that these employees would use nearby parks while working. Therefore, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities, nor would it require construction of new or expanded parks or recreational facilities Nevertheless, the City imposes a development impact fee on commercial uses to mitigate potential impacts on parks—$0.74 per square foot (Colton 2020). Overall, no impact would occur and no mitigation measures are necessary.

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

No Impact. The Project does not involve the development of recreational facilities. Also, Project development would not require construction of new or expanded recreational facilities, as noted in Section 3.16.a, above. Therefore, no impact would occur and no mitigation measures are necessary.

3.17 TRANSPORTATION

The analysis in this section is based in part on the following technical studies, included as Appendix (H) to this Initial Study:

- Trip Generation and VMT Screening Analysis, EPD Solutions Inc., December 2021.

Would the project:

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

Less Than Significant Impact. The following is a discussion of the Project's potential impacts on a program, plan, ordinance, or policy addressing the circulation system.

Roadway Facilities

Environmental Planning Development Solutions (EPD) prepared a trip generation analysis memorandum for the Project (Appendix H). The Project trip generation was evaluated using two different methods. First, the trip generation was based on Project operation, specifically it was estimated using the anticipated number of employee and RV/truck trips. The Project was also evaluated using trip rates for General Light Industrial (Land Use Code 110) from the Institute of Transportation Engineers (ITE). The worst-case trip generation was found using the ITE trip rates, which would result in a trip generation of 428 daily passenger care equivalent trips, including 65 trips during the AM peak hour and 57 trips during the PM peak hour.

San Bernardino County's Transportation Impact Study Guidelines do not require project applicants to prepare a level of service (LOS) traffic impact analysis (TIA) if the project generates fewer than 100 peak hour trips. Based on the peak hour trip generation of 65 trips during the AM peak hour and 57 trips during the PM peak hour, the Project would not meet the threshold for preparation of a LOS TIA.

Additionally, the project applicant would be required to pay all applicable City-established Development Impact Fees, including the Traffic Facilities Fee (Ordinance No. O-020-20). These fees are used by the City to fund the local and regional transportation system. The fees are intended to mitigate the cumulative traffic effects of land development projects.

Based on the preceding, the minimal increase in peak hour trips would not result in a conflict with a program, plan, ordinance or policy addressing the roadway facilities. Impacts would be less than significant and no mitigation measures are necessary.

Alternate Modes of Transportation

As shown in Figure 4, *Conceptual Site Plan*, there would be no pedestrian access to the Project Site via a public sidewalk. Currently, there is no sidewalk along E Santo Antonio Drive and there are no plans for a public sidewalk as a part of the Project development. However, a public sidewalk borders the western boundary of the Project Site, along S Mt Vernon Avenue. The sidewalk is connected at the E Santo Antonio Drive/S Mt

Vernon Avenue intersection to a two-way cross walk with a crosswalk signal and button allowing for safe access to the surrounding retail and business uses. Project development would not inhibit pedestrian use of the sidewalk or crosswalk, nor would it inhibit their safety. Also, Project development would not result in an impact to the pedestrian circulation system in and around the Project Site

There are no bicycle lanes or facilities within or adjacent to the Project Site. Project development would not impact or alter any existing bicycle lanes or facilities. The closest bicycle facility is a dedicated, striped on-street bicycle lane that begins on the northwest corner of S Mt Vernon Avenue and East Cooley Drive for approximately 0.2 miles until it terminates at the entrance of the Santa Ana River trail. Additionally, a striped on-street bicycle lane that begins on the southeast corner of S Mt Vernon Avenue and East Cooley Drive for approximately 0.3 miles until it terminates at East Via Venita. Additionally, Project development includes bicycle parking onsite in accordance with mandatory standards from CALGreen Divisions 5.1. Furthermore, Section 21100(h) of the California Vehicle Code allows bicyclists to ride on sidewalks. Bicyclists are also allowed to ride on all roadways in Colton pursuant to CVC Section 21202. Section 21202 of the CVC requires any person operating a bicycle on a roadway at a speed less than the normal speed of traffic moving in the same direction at that time shall ride as close as practicable to the right-hand curb or edge of the roadway.

Omnitrans operates public transit bus routes in the City. Bus Routes 19 and 215 are the closest bus routes to the Project Site. Bus Route 19 travels north and south on S Mt Vernon Avenue. The northern route travels along S Mt Vernon Avenue from E Santo Antonio Drive to M Street into central Colton. The southern route travels along S Mt Vernon Avenue from E Santo Antonio Drive to Washington. Bus Route 215 travels south-north along S Mt Vernon Avenue from Centerpointe Drive to Interstate 10 (north of the Project Site). These bus routes are those that are within a reasonable walking distance of the Project Site. The closest bus stop for route 19 is on the western border of the Project Site, approximately 200 feet from the projects site entrance. The closest bus stop for Route 215 is approximately 0.2 mile south of the Project Site at S Mt Vernon Avenue from Centerpointe Drive. These bus routes and stops are a reasonable walking distance from the Project Site and would be available to serve workers and patrons of the Project. It is anticipated that the number of bus riders that would be generated by the Project would be low. Project implementation would not require the need for additional Omnitrans bus routes or stops to serve the Project's users.

Based on the preceding, the Project would not result in conflict with a program, plan, ordinance or policy addressing the alternate mode of transportation facilities. Impacts would be less than significant and no mitigation measures are necessary.

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

Less Than Significant Impact. Senate Bill (SB) 743 was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. SB743 specified that the new criteria should promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. The bill also specified that delay-based level of service could no longer be considered an indicator of a significant impact on the environment. In response, Section 15064.3 (Determining the Significance of Transportation Impacts) was added to the CEQA Guidelines on January 1,

2019. Section 15064.3 states that Vehicle Miles Traveled (VMT) is the most appropriate measure of transportation impacts and provides lead agencies with the discretion to choose the most appropriate methodology and thresholds for evaluating VMT.

Following is a discussion of Project's potential impacts on VMT.

City of Colton VMT Screening

The City of Colton Vehicle Miles Traveled Guidelines (June 2, 2020) provide criteria for projects that would be considered to have a less-than significant impact on VMT and therefore could be screened out from further analysis. If a project meets one of the following criteria, then the VMT impact of the project is considered less-than significant and no further analysis of VMT would be required:

1. The project generates fewer than 110 daily vehicle trips.
2. The project is a local-serving land use.
3. The project is located within a High Quality Transit Area (HQTA).
4. The project is located in a low VMT area.

The applicability of each criterion to the Project is discussed below.

Screening Criteria 1 – Project Trip Generation. The City's guidelines state that projects generating fewer than 110 daily vehicle trips would not be required to complete a VMT assessment. The City's guidelines specify that VMT is defined as the distance attributable to cars and light trucks. The guidelines also cite the December 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA by OPR, which indicates that heavy duty trucks do not need to be included in the VMT analysis. This approach is consistent with CEQA Guidelines Section 15064.3(a), which states "For the purpose of this section, "vehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project". Based on these guidance documents, truck trips generated by the Project have not been included in this VMT screening analysis.

As discussed above, the Project trip generation was evaluated using both the anticipated number of employee and RV/truck trips from the project description and using trip rates for General Light Industrial (Land Use Code 110) from the ITE. The Project would generate 31 daily passenger car trips when evaluated using the project operation and would generate 89 daily passenger car trips when evaluated using ITE trip rates. Even with the worst-case scenario of 89 daily passenger car trips, the Project would generate fewer than 110 daily passenger car trips, and therefore the Project is presumed to have a less than significant impact on VMT. Because the Project would generate fewer than 110 daily passenger car trips, the Project would meet Screening Criteria 1 and a VMT analysis would not be required.

Screening Criteria 2 – Local Serving Land Use. According to the City's guidelines, projects that serve the local community would be assumed to have a negligible impact on the City's VMT and therefore would not be required to complete a VMT assessment. These types of projects include K-12 schools, local serving retail,

day care centers, gas stations, banks, and student housing. The Project does not propose a local-serving use, as defined in the guidelines, and therefore would not be considered a local serving land use. Therefore, Screening Criteria 2 would not apply.

Screening Criteria 3 – High Quality Transit Area (HQTA). According to the City's guidelines, projects located in a HQTA, defined as within one half mile of an existing major transit stop or from an existing stop along a high-quality transit corridor, may be presumed to have a less than significant VMT impact. The Project Site is not located in a HQTA; therefore, the Project would not satisfy the requirements of Screening Criteria 3.

Screening Criteria 4 – Low VMT Area. The City's guidelines include a screening threshold for projects located in a low VMT generating area. A low-VMT generating area is defined as 15 percent below the City of Colton's average VMT from the 2016 Baseline. The guidelines provide a map showing the low-VMT generating zones within the city. The Project is not located in a low VMT area. Therefore, the Project would not satisfy the requirements of Screening Criteria 4.

Based on the preceding, VMT impacts would be less than significant and no mitigation measures are necessary.

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

No Impact. As shown in Figure 4, *Conceptual Site Plan*, vehicular access to the Project Site would be provided via two driveways off E Santo Antonio Drive. Emergency vehicle access to the Project Site would be via the two driveways, which connect to the internal loop road. The loop road would serve as a fire lane and become part of the onsite fire access loop.

The City and Colton Fire Department (CFD) have adopted design standards that preclude the construction of any unsafe roadway, circulation, or access design features. Design and construction of the proposed access and circulation improvements would be required to adhere to the City of Colton Standard Drawings and CFD's design standards, which are imposed on development projects during the City's development review and building plan check process. Compliance with the established design standards would ensure that hazards due to design features would not occur and that the placement of the vehicular access and circulation improvements would not create a conflict for motorists, pedestrians, or bicyclists traveling within or around the Project Site. For example, the width (40 feet) of the proposed vehicular access driveways off E Santo Antonio Drive would be designed to allow large trucks such as RV's, tow, delivery and fire trucks to safely and adequately access the Project Site.

Additionally, the proposed driveways would be designed to adhere to the City's sight distance requirements, which would ensure that vehicles exiting/entering the Project Site would be able to make safe turning movements out of/into the site without any visual or physical obstructions (e.g., walls, trees, parked vehicles). Based on a site and a review of Google Earth maps, there are no restrictions blocking the view from proposed location of the access driveways and east- and west-bound traffic on E Santo Antonio Drive, and sufficient sight distance would be provided.

Furthermore, the Project would not include incompatible uses such as farm equipment or other unusually slow vehicles that would present a traffic hazard on area roadways.

Therefore, no impact resulting from hazards due to design features or incompatible uses would occur no mitigation measures are necessary.

d) Result in inadequate emergency access?

No Impact. As outlined above, the Project would introduce a number of new onsite vehicular access and circulation improvements. To address emergency and fire access needs, the improvements would be required to be designed in accordance with all applicable CFD design standards for emergency access (e.g., minimum lane width and turning radius). For example, internal drive aisles would be designed to meet the minimum width requirements of CFD to allow the passing of emergency vehicles.

Additionally, the Project would be required to incorporate all applicable design and safety requirements as set forth in the most current adopted fire codes, building codes, and nationally recognized fire and life safety standards of Colton and CFD, such as those outlined in Chapter 15.16 (California Fire Code) of the Colton Municipal Code. Compliance with these standards is ensured through the City's and LACFD's development review and building plan check process.

Furthermore, during the development review and building plan check process, the City would coordinate with CFD and CPD to ensure that the necessary fire prevention and emergency response features are incorporated into the Project and that adequate circulation and access (e.g., adequate turning radii for fire trucks) are provided within the traffic and circulation components of the Project. As previously described, emergency access to the Project Site would be via the two driveways off E Santo Antonio Drive that connect to an internal loop road. All site and building improvements/development proposed under the Project would be subject to review and approval by the City, CFD and CPD.

Finally, Project implementation would not require major road closures or otherwise impact the functionality of S Mt Vernon Avenue or Santo Antoni Drive as public safety access routes. However, to make the necessary infrastructure connections to the existing water main and construct the proposed driveways, construction within the public right-of-way of E Santo Antonio Drive would occur. For example, some construction would occur within the public right-of-way of this road to make the necessary potable water and wastewater infrastructure connections. Any minor road closure would be temporary and would only be necessary during the construction activities associated with these improvements. All proposed road closures would also be subject to review and approval by the City. Upon completion of the improvements within the E Santo Antonio Drive right-of-way, all road conditions would be restored to normal.

Based on the preceding, no impacts to emergency access would occur no mitigation measures are necessary.

3.18 TRIBAL CULTURAL RESOURCES

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

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

No Impact. See response to Section 3.5.a, above. As substantiated in this section, no impact to historical resources would occur and no mitigation measures are necessary. Additionally, the cultural resources assessment conducted for the Project Site determined that there are no Traditional Cultural Resources (TCRs) listed or eligible for listing in the California Register of Historical Resources as defined in Public Resources Code section 5020.1(k) within the Project Site or within a 0.5-mile radius surrounding the Project Site. Therefore, no impact would occur and no mitigation measures are necessary.

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

Less Than Significant Impact. Conducting consultation early in the CEQA process allows tribal governments, public lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. The intent of the consultations is to provide an opportunity for interested Native American contacts to work together with the lead agency (in this case, Colton) during the project planning process to identify and protect tribal cultural resources.

The provisions of CEQA, Public Resources Code Sections 21080.3.1 et seq. (also known as AB 52), requires meaningful consultation with California Native American Tribes on potential impacts to tribal cultural resources, as defined in Public Resources Code Section 21074. Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources (CNRA 2018b).

As part of the AB 52 process, Native American tribes must submit a written request to the relevant lead agency if it wishes to be notified of projects that require CEQA public noticing and are within its traditionally and culturally affiliated geographical area. The lead agency must provide written, formal notification to the tribes that have requested it within 14 days of determining that a project application is complete or deciding to undertake a project. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Consultation

concludes when either 1): the parties agree to mitigation measures to avoid a significant effect, if one exists, on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. AB 52 also addresses confidentiality during tribal consultation per Public Resources Code Section 21082.3(c).

In accordance with the provisions of AB 52, the City sent formal notifications letters on February 2, 2022, to the following tribes:

- Agua Caliente Band of Cahuilla Indians
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino /Tongva Nation
- Gabrieleño/Tongva San Gabriel Band of Mission Indians
- Gabrielino-Tongva Tribe
- Gabrieleño Band of Mission Indians - Kizh Nation
- Morongo Band of Mission Indians
- Pala Band of Mission Indians
- Pechanga Band of Luiseno Indians
- Quechan Tribe of the Fort Yuma Reservation
- Rincon Band of Luiseno Indians
- San Manuel Band of Mission Indians
- Santa Rosa Band of Cahuilla Indians
- Serrano Nation of Mission Indians
- Soboba Band of Luiseno Indians

The 30-day noticing requirement under AB 52 was completed on March 17, 2022, approximately 30 days from the date the tribes received the notification letter. The City received responses from the Agua Caliente Band of Cahuilla Indians and Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation). The Agua Caliente Band of Cahuilla Indians requested additional cultural documentation for the Project, which the City provided. After receipt of the additional documentation, the Agua Caliente Band of Cahuilla Indians sent the City with a follow up communication with general comments regarding human remains and the requirement of notifying the San Bernardino County Coroner, which is addressed in Section 3.5.c, but did not request consultation or mitigation. The Kizh Nation did request consultation with the City, which the City set a date for a consultation meeting. However, after further communications with the City and prior to the consultation meeting, Kizh Nation informed the City that after reviewing the Project's cultural documentation they no longer needed to meet with the City to consult and no mitigation was requested. Therefore, the City completed its obligation under AB 52 and no further action is necessary

Based on the preceding, impacts to tribal cultural resource would be less than significant and no mitigation measures are necessary.

3.19 UTILITIES AND SERVICE SYSTEMS

Would the project:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. Following is a discussion of the Project's potential impacts on water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities.

Water Supply Facilities

The City of Colton Water Department is the municipally owned utility that provides potable and non-potable water at retail to customers primarily within the City. Colton's service area covers approximately 90 percent of the city. It includes 14 square miles in the city and approximately 0.8 square miles of unincorporated area in San Bernardino County. Colton's water supply is comprised entirely of groundwater extracted from the Bunker Hill Basin, the Rialto-Colton Basin, and the Riverside-Arlington Basin. The City does not currently import water to meet the demands of its service area.

According to the 2020 Upper Santa Ana River Watershed Integrated Regional Water Management Plan (IRWMP), total water demand in Colton's service area in 2020 was 9,224 acre-feet (af). The IRWMP estimates that water demands in Colton's service area for normal years would increase from approximately to 9,759 af in 2025 to approximately 11,388 af in 2045. Colton's water supply is projected to increase from 11,222 af in 2025 to 13,096 af in 2040. Therefore, Colton projects that it would have a residual capacity of 1,463 af of potable water in 2025 and a residual capacity of 1,708 af of potable water in 2045 (WSC 2021).

The Project includes a 25,287-square-foot commercial building, which includes a first floor encompassing 21,443 square feet and a mezzanine comprising of 3,844 square feet. The first floor would feature service bays with roll-up doors, a paint spray booth, office and open workspaces, a sale/service area, storage rooms, restrooms, and employee break/locker rooms. The mezzanine would be used for parts storage. For water demand calculations, it is assumed that 20 percent of the ground floor would include the offices and open workspaces, storage rooms, restrooms, and employee break/locker rooms. These uses have a water demand that is similar to general office use buildings. The remainder of the first floor would have a water demand that is conservatively assumed to be similar to service stations. The mezzanine area would not require any water demand. Additional water for washing up to 10 RVs per day, which is a worse-case scenario, and water for irrigation are also estimated. Water demand estimates for the Project are included in Table 12. As shown in the table, the Project would require a water demand of approximately 8,386 gpd (or approximately 9.4-acre feet per year).

Table 12 Projected Water Demand

Scenario	Square Feet (SF)	Indoor Water Use Rate (gpd per SF)	Total Water Demand (gpd)
Office Use	4,289	0.49[1]	2,102
Maintenance Use	17,154	0.26[2]	4,460
RV Washing	—	—	120[3]
Landscaping	36,687	—	1,704[4]
		Total	**8,386**

Source: CAPCOA 2017, DWR 2017, DWR 2022.
Notes: SF = square feet; gpd = gallons per day
[1] CAPCOA rate for "General Office Building" used.
[2] CAPCOA rate for "Gasoline/Service Station" used.
[3] Provided by applicant for washing 10 RVs/day. Numbers based on operations at similar facilities owned by the applicant.
[4] An annual precipitation of 5.8 inches and average standard evapotranspiration of 62.23 inches were used per the readings from the of University of California, Riverside weather. Readings from May 2021 to April 2022 were used. All landscaping is conservatively assumed to be overhead spray irrigation. The maximum applied water allowance (MAWA) for the proposed project is shown here.

Colton estimates that it will have sufficient water supplies to meet proposed growth in its service area for normal, single-dry, and multiple-dry years, and the Project's water demand is nominal in comparison to the City's 1,708 af residual capacity. Therefore, Project development would not require the construction of new or expanded water treatment facilities. Impacts would be less than significant and no mitigation measures are necessary.

Wastewater Treatment Facilities

The City owns and operates a water reclamation plant (CWRF) that accepts domestic, commercial, and industrial wastewater generated within the Cities of Colton and Grand Terrace, and some unincorporated areas of San Bernardino County. The facility treats an average daily flow of 5.6 million gallons per day (mgd). The CWRF is designed to treat a maximum of 10.4 mgd. Therefore, the CWRF has a total remaining daily treatment capacity of 4.8 mgd. Wastewater treatment requirements for the CWRF are established by the Santa Ana RWQCB, which issues the NPDES Permit. The CWRF is required to comply with the discharge requirements to ensure that effluent discharges are within acceptable water quality parameters. The secondary treated wastewater is directed to a rapid infiltration extraction facility, jointly owned by the Cities of Colton and San Bernardino, where wastewater goes for tertiary treatment before being discharged to the Santa Ana River. Wastewater treatment for this facility is also established through the RWQCB's NPDES Permit (City of Colton 2022, Santa Ana RWQCB 2012).

Wastewater generation for the Project is assumed to be 100 percent of indoor water use in addition to the water used to wash the RVs since this water is captured by the sewer system. Therefore, the Project would generate about 6,682 gallons per day of wastewater. The amount of wastewater that would be generated is much less than one percent of CWRF's total remaining daily treatment capacity. Therefore, Project development would not require the construction of new or expanded wastewater treatment facilities. Impacts would be less than significant and no mitigation measures are necessary.

Stormwater Drainage Facilities

See response to Section 3.10.c.iii, above. As substantiated in this section, impacts would be less than significant and no mitigation measures are necessary.

Electric Facilities

Electricity for the Project would be supplied by Colton Electric Department (CED). CED owns and operates its own power plant, five substations, and the entire electric infrastructure including the transmission and distribution lines within the city. CED developed the 2017 Integrated Resource Plan (IRP), which presents a strategy for dealing with some of the power supply issues that the CED faces and alternative scenarios for resource procurement that are consistent with current legislative and regulatory constraints. The IRP also includes conservation programs, such as rebates, to meet GHG reduction goals (CED 2017). The Project would result in an annual net increase in electricity demand of 260,983 kWh (refer to Section 3.6, *Energy*).

The Project would be required to comply with energy efficiency standards of Title 24 of the California Administrative Code and the Appliance Efficiency Regulations. The Project would also comply with CALGreen requirements related to energy and water conservation. Therefore, Project development would not require the construction of new or expanded electric power facilities. Impacts would be less than significant and no mitigation measures are necessary.

Natura Gas Facilities

Natural gas would be provided by the Southern California Gas Company (SoCalGas) via existing infrastructure in the immediate area of the Project Site. The Project would result in an annual net increase in natural gas demand of 838,640 kBTU (refer to Section 3.6, *Energy*). The total gas consumption in the SoCalGas service area was approximately 7,406 million therms in 2019, with slightly decreasing demand projected up to the 2030 (CEC 2019). The natural gas consumption rate for the Project is typical for projects of this size and is a modest increase in gas use in the context of SoCalGas' service territory.

In addition, the Project would be required to comply with energy efficiency standards of Title 24 of the California Administrative Code and the Appliance Efficiency Regulations. The Project would also comply with CALGreen requirements related to energy and water conservation. These measures would help decrease gas consumption.

Therefore, the Project would not result in a substantial increase in natural gas service demands. SoCalGas would not need to expand their supply and transmission facilities to handle the demand generated by the Project. Impacts would be less than significant and no mitigation measures are necessary.

Telecommunication Facilities

The Project would include onsite connections to telecommunication services. The construction-related impacts associated with these improvements are analyzed throughout this Initial Study as part of the project development. Impacts would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. The 2020 Upper Santa Ana River IRWMP found that the City has a reliable water supply that is adequate to meet existing and projected demands over the next 20 years, as substantiated above in Section 3.19.a, above.

Additionally, the Project's landscaping would be required to be installed and maintained in compliance with Section 13.30 (Water Efficient Landscape Ordinance) of the Colton municipal Code, which sets landscape design standards for water conservation. Furthermore, Project development would be required to comply with the provisions of CALGreen, which contains requirements for indoor water use reduction and site irrigation conservation.

Based on the preceding, there are adequate water supplies to meet the water demands of the Project and Project development would not require the City to obtain new or expanded water supplies. Therefore, impacts on water supplies due to Project development would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. As substantiated above in Section 3.19.a, there is existing wastewater treatment capacity in the region for estimated project wastewater generation. Project development would not require construction of new or expanded wastewater treatment facilities. Therefore, impacts would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. In 2019, approximately 76 percent of the municipal solid waste landfilled from the city was disposed of at the Mid-Valley Sanitary Landfill (CalRecycle 2019b). Capacity and disposal data for the landfill is shown in Table 13. As shown in the table, the landfill has a residual capacity of 3,854 tons per day.

Table 13 Landfill Capacity

Landfill	Current Remaining Capacity (tons)[1]	Maximum Daily Disposal Capacity (tons)	Average Daily Disposal, 2021 (tons)[2]	Residual Daily Disposal Capacity (tons)	Estimated Close Date
Mid-Valley Sanitary Landfill	61,219,377	7,500	3,646	3,854	4/1/2045

Sources: CalRecycle 2019c, 2019d.

[1] A Volume-to-Weight conversion rate of 2,000 lbs/cubic yard (1 tons/cubic yard) for "Compacted - MSW Large Landfill with Best Management Practices" is used as per CalRecyle's 2016 Volume-to-Weight Conversion Factors https://www.epa.gov/sites/production/files/201604/documents/volume_to_weight_conversion_factors_memorandum_04192016_508fnl.pdf.

[2] Average daily disposal is calculated based on 300 operating days per year. The facility is open six days per week, Monday through Saturday, except certain holidays.

The Project is estimated to generate about 215 pounds of solid waste per day, as shown in Table 14. The breakdown for office and maintenance use for the first floor of the building that was used to estimate water demand is used to estimate solid waste generation. However, the 3,844 square foot mezzanine would also generate solid waste and is conservatively assumed to be similar to solid waste generated from maintenance use.

Table 14 Solid Waste Generation

Scenario	Square Feet	Solid Waste Generation, pounds per day	
		Per square foot	Total
Office Use	4,289	0.006[1]	26
Maintenance Use	17,154	0.009[2]	154
Mezzanine	3,844	0.009	35
		Total	**215**

Source: CalRecycle 2019d.
1 CalRecylce rate for offices used.
2 CalRecylce rate for auto dealer and service station used.

As demonstrated in Table 13, there is adequate landfill capacity for the Project's forecasted solid waste, and Project development would not require additional landfill capacity at the landfill serving the city. Additionally, the total amount of solid waste expected to be generated under the Project would be minimal compared to the total permitted daily maximum solid waste tonnage per day of the landfill serving the city.

Additionally, Project construction would be required to comply with Section 15.58.40, *Construction and Demolition Recycling Requirements,* and Section 15.58.030, *Site and Building Recycling Plan Requirements*, of the Colton Municipal Code. Furthermore, Project development would be required to comply with the provisions of the 2019 CALGreen, which outlines requirements for construction waste reduction, material selection, and natural resource conservation.

Based on the preceding, impacts on landfill capacity would be less than significant and no mitigation measures are necessary.

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

No Impact. See response to section 3.19.d, above.

Additionally, the following federal, state, and local laws and regulations govern solid waste disposal, including:

- USEPA administers the Resource Conservation and Recovery Act of 1976 and the Solid Waste Disposal Act of 1965, which govern solid waste disposal.
- Assembly Bill (AB) 341 (Chapter 476, Statutes of 2011) increases the statewide waste diversion goal to 75 percent by 2020, and mandates recycling for commercial and multi-family residential land uses.

- AB 939 (Integrated Solid Waste Management Act of 1989; Public Resources Code 40050 et seq.) required every California city and county to divert 50 percent of its waste from landfills by the year 2000 by such means as recycling, source reduction, and composting. In addition, AB 939 requires each county to prepare a countywide siting element specifying areas for transformation or disposal sites to provide capacity for solid waste generated in the county that cannot be reduced or recycled for a 15-year period.

- AB 1327 (California Solid Waste Reuse and Recycling Access Act of 1991) requires local agencies to adopt ordinances mandating the use of recyclable materials in development projects.

Project-related construction and operation phases would be implemented in accordance with all applicable federal, state, and local laws and regulations govern solid waste disposal. Therefore, no impact would occur, and no mitigation measures are necessary.

3.20 WILDFIRE

Wildland fire protection in California is the responsibility of either the local government, state, or federal government. State Responsibility Areas (SRA) are the areas in the state where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. The SRA forms one large a basic level of wildland fire prevention and protection services.

Local responsibility areas (LRA) include incorporated cities, cultivated agriculture lands, and portions of the desert. LRA fire protection is typically provided by city fire departments, fire protection districts, counties, and by the California Department of Forestry and Fire Protection (CAL FIRE) under contract to local governments. CAL FIRE uses an extension of the SRA Fire Hazard Severity Zone model as the basis for evaluating fire hazard in LRAs. The local responsibility area hazard rating reflects flame and ember intrusion from adjacent wildlands and from flammable vegetation in the urban area. CFD currently provides fire protection and emergency medical services to the city.

Fire Hazard Severity Zones (FHSZ) are identified by Moderate, High and Very High in an SRA, and Very High in an LRA. The nearest FHSZ in the SRA is a Very High FHSZ approximately 1.15 miles southeast of the Project Site. The nearest FHSZ in the LRA is a VHFHSZ approximately 0.33 miles south of the Project Site (CAL FIRE 2022). Land between the edge of the nearest FHSZ's and the Project Site is dense urban development.

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

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

No Impact. As demonstrated above, the Project Site is not in, adjacent to or within proximity of an SRA or LRA or lands classified as high fire hazard severity zones. Therefore, the Project would not impact an adopted emergency response plan or emergency evacuation plan. No impact would occur and no mitigation measures are necessary.

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

No Impact. As demonstrated above, the Project Site is not in, adjacent to or within proximity of an SRA or LRA or lands classified as high fire hazard severity zones. Therefore, the Project would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No impact would occur and no mitigation measures are necessary.

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

No Impact. As demonstrated above, the Project Site is not in or near an SRA or LRA or lands classified as high fire hazard severity zones. Additionally, the Project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk. Therefore, no impact would occur and no mitigation measures are necessary.

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

No Impact. As demonstrated above, the Project Site is not in or near an SRA or LRA or lands classified as high fire hazard severity zones. The Project Site is undeveloped land that is heavily disturbed and devoid of vegetation except for a few scattered trees and shrubs. The site consists mainly of bare or exposed soil. Therefore, Project development would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. No impact would occur and no mitigation measures are necessary.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

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?

Less Than Significant Impact With Mitigation Incorporated. Insert text here. As shown in Figure 3, *Aerial Photograph*, the Project Site is vacant. The site is in an urbanized area of the city and is surrounded by a mix of commercial, retail, office and residential uses. As demonstrated in Section 3.4, *Biological Resources*, impacts to biological resources would be reduced to a level of less than significant with implementation of Mitigation Measure BIO-1. Additionally, as demonstrated in Section 3.5, *Cultural Resources*, no historic resources were identified onsite, and therefore the Project does not have the potential to eliminate important examples of California history or prehistory. Impacts were deemed to be less than significant. As also

demonstrated in Sections 3.5, impacts to archeological resources would be reduced to a level of less than significant with implementation of Mitigation Measure CUL-1

b) Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?

Less Than Significant Impact. Because this Initial Study analyzes long- and short-term impacts and determined that all potential impacts would be less than significant level, the project would not achieve short-term environmental goals to the disadvantage of long-term environmental goals.

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

Less Than Significant Impact. The issues relevant to Project development are confined to the immediate Project Site and surrounding area. Additionally, the Project Site is in an urbanized area of the city where supporting utility infrastructure (e.g., water, wastewater, and drainage) and services (e.g., solid waste collection, police and fire protection) currently exist. As substantiated in this Initial Study, Project implementation would not require the construction of new or expansion of existing utility infrastructure or services.

Furthermore, impacts related to other topical areas such as air quality, GHG, hydrology and water quality, and traffic would not be cumulatively considerable with Project development in conjunction with other cumulative projects.

In consideration of the preceding factors, the Project's contribution to cumulative impacts would be rendered less than significant; therefore, Project impacts would not be cumulatively considerable.

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

Less Than Significant Impact. The Project's potential to result in environmental effects that could adversely affect human beings, either directly or indirectly, has been discussed throughout this Initial Study. As discussed in the respective topical sections of this Initial Study, implementation of the Project would not result in significant impacts, either directly or indirectly, in the areas of air quality, GHG, geology and soils, hazards and hazardous materials, hydrology and water quality, wildfire, which may cause adverse effects on human beings. Additionally, as demonstrated in Section 3.13, *Noise*, with implementation of Mitigation Measure NOI-1, noise impacts would be reduced to a level of less than significant.

3. Environmental Analysis

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4. Mitigation Monitoring and Reporting Program

Project-specific mitigation measures have been categorized in matrix format, as shown in Table 15. The matrix identifies the environmental factor, specific mitigation measures, schedule, and responsible monitor. The matrix also identifies all conditions of approval applicable to the Project, as identified throughout this Initial Study. The mitigation matrix serves as the basis for scheduling the implementation of, and compliance with, all mitigation measures.

Table 15 Mitigation Monitoring Requirements

	Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
Biological Resources					
BIO-1	To avoid impacts to nesting birds within or adjacent to the Project Site and to comply with the California Fish and Game Codes 3503 & 3513 and Migratory Bird Treaty Act, any site clearing activities should occur between non-nesting (or non-breeding) season for birds (generally, September 1st to January 31st). If this avoidance schedule is not feasible, the project applicant shall carry out such activities under the supervision of a qualified biologist. This shall entail the following: A qualified biologist shall conduct a pre-construction nesting bird survey no more than 14 days prior to initiating ground disturbance activities. The survey will consist of full coverage of the proposed disturbance limits and up to a 500-foot buffer area, determined by the biologist and taking into account the species nesting in the area and the habitat present. If no active nests are found, no additional measures are required. If "occupied" nests are found, their locations shall be mapped, species documented, and, to the degree feasible, the status of the nest (e.g., incubation of eggs, feeding of young, near fledging) recorded. The biologist	Project applicant, construction contractor, and biologist	Prior to the commencement of any site clearing and/or grading activities	General contractor and/or grading contractor for project applicant	

4. Mitigation Monitoring and Reporting Program

Table 15 Mitigation Monitoring Requirements

	Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
	shall establish a no-disturbance buffer around each active nest. The buffer area will be determined by the biologist based on the species present, surrounding habitat, and type of construction activities proposed in the area. No construction or ground disturbance activities shall be conducted within the buffer until the biologist has determined the nest is no longer active and has informed the construction supervisor that activities may resume.				
Cultural Resources					
CUL-1	Prior to the issuance of grading permits, the project applicant shall provide a letter to the City of Colton Planning Division from a qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications for Archeology as defined at 36 CFR Part 61, Appendix A (Professional Archeologist). The letter shall state that the project applicant has retained such an individual, and that the consultant will be on call during all grading and other significant ground-disturbing activities. In the event that potential archeological resources are discovered during ground-disturbing activities, all such activity shall cease in the immediate area of the find (within a 60-foot buffer), and the professional archeological monitor shall have the authority to halt any activities adversely impacting potentially significant cultural resources until they can be formally evaluated. Suspension of ground disturbances in the vicinity of the discovery shall not be lifted until the archaeological monitor has evaluated the discovery to assess whether it is classified as a significant cultural resource pursuant to the CEQA (California Environmental Quality Act) definition of historical (State CEQA Guidelines 15064.5[a]) and/or unique archeological resource (Public Resources Code 21083.2[g]). Work may continue in other areas of the project site outside of the buffered area and for other project	Project applicant, construction contractor, and archeologist	Prior to the issuance of grading permits	General contractor and/or grading contractor for project applicant	

Table 15 Mitigation Monitoring Requirements

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
elements while the encountered find is evaluated. Additionally, the Gabrieleño Band of Mission Indians – Kizh Nation shall be contacted regarding any pre-contact and/or historic era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find in order to provide Kizh Nation input with regards to significance and treatment. The City and/or project applicant shall, in good faith, consult with Kizh Nation throughout the duration of ground-disturbing activities. If upon completion of the assessment the archeological monitor determines that the find qualifies as a significant cultural resource, the qualified archeologist shall make recommendations on the treatment and disposition of the deposits, which shall be developed in accordance with all applicable provisions of California Public Resource Code Section 21083.2 and State CEQA Guidelines Sections 15064.5 and 15126.4. For example, if significant cultural resources are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan (MTP). The MTP shall be overseen and implemented by the archeologist and include mitigation measures to follow regarding identification and recording methods, and evaluation and final treatment of any cultural resources identified. The MTP shall allow for a Kizh Nation monitor to be present for the remainder of the ground-disturbing activities, should Kizh Nation elect to place a monitor onsite. Likely mitigations would involve temporary avoidance of the area of discovery plus a 60-foot buffer, development of a cultural resources eligibility evaluation plan in consultation with Kizh Nation and the City, and test excavation to determine eligibility of any discovery for California Register of Historical Resources listing eligibility. Final disposition of any artifacts recovered shall be determined during development of the evaluation plan and would be likely to include reburial onsite,				

4. Mitigation Monitoring and Reporting Program

Table 15 Mitigation Monitoring Requirements

	Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
	donation to Kizh Nation or other Native American entities, or curation at a federally approved repository. The draft MTP, and any/all archaeological/cultural documents created (isolate records, site records, survey reports, testing reports, etc.), shall be provided to the City for dissemination to Kizh Nation. The archaeologist shall monitor the remainder of the Project Site and implement the MTP accordingly. The archaeologist shall prepare a final report describing all identified and curated resources (if any are found) and submit the report to the City for dissemination to SMBMI. If disturbed resources are required to be collected and preserved, the project applicant shall be required to participate financially up to the limits imposed by Public Resources Code Section 21083.2.				
Noise					
NOI-1	The following measures shall be implemented by the project applicant and construction contractor during grading and paving activities: • Vibratory compaction that is within 10 to 15 feet of any surrounding structure shall use a static roller in lieu of a vibratory roller. At a distance greater than 10 feet or greater a static roller would no longer exceed 0.20 inches per second peak particle velocity. • Grading and earthwork activities within 10 to 15 feet of any surrounding structure shall be conducted with off-road equipment that is limited to 100 horsepower or less.	Project applicant and construction contractor	During grading and paving activities	General contractor and/or grading contractor for project applicant	
Tribal Cultural Resources					
CUL-1	Mitigation Measure CUL-1 applies here.	Project applicant, construction contractor, and archeologist	Prior to the issuance of grading permits	General contractor and/or grading contractor for project applicant	

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