FINAL MITIGATED NEGATIVE DECLARATION for the City of Riverside, Scheuer and Garner Solar Power Facilities Project, San Bernardino California

Prepared for:

City of Riverside Public Utilities Department Water Division 3750 University Ave., 3rd Floor Riverside, CA 92501 Contact: Matthew Bates (951) 826-5116 Prepared by:

SunPower Corporation 2125 E Katella Ave #220 Anaheim, CA 92806 Contact: Charles Sandschafer (714) 787-3822

MITIGATED NEGATIVE DECLARATION FOR THE SCHEUER AND GARNER SOLAR POWER FACILITIES PROJECT, SAN BERNARDINO, CALIFORNIA

INTRODUCTION

The Draft Initial Study and Mitigated Negative Declaration for the Scheuer and Garner Solar Power Facilities Project, was circulated for a public review beginning February 4, 2016 and ending on February 25, 2016.

Four letters, including two of which, are confidential on the Draft Mitigated Negative Declaration (MND) were received during the public review period. Letters were received from the following parties:

- California State Clearinghouse
- Gabrieleno Band of Mission Indians Kizh Nation
- Soboba Band of Luiseno Indians
- Joseph E. Bonadiman and Associates, Inc.

Minor changes are presented in track changes and/or underline text to indicate deleted or proposed new language. Revisions are intended to correct minor discrepancies and provide additional clarification. Additional tribal consultation has resulted in minor changes to the cultural resources analysis and one additional mitigation measure. All other mitigation requirements for impacts remain unchanged and will be implemented as stated in the Mitigation Monitoring and Reporting Program. Furthermore, ongoing consultation with the City of San Bernardino has resulted in minor changes to the project description. The revisions do not constitute significant changes to the project or environmental setting, no new significant environmental effects have been identified for the project, and the severity of environmental impacts would not be increased. The changes do not affect the conclusions of the Draft MND. No new significant impacts have been identified.

PROJECT DESCRIPTION

Name of Project: Scheuer and Garner Solar Power Facilities Project

The City of Riverside, through its Public Utilities Department (RPU), proposes to develop two solar photovoltaic (PV) electrical generating facilities on properties owned by RPU within the City of San Bernardino. The Scheuer site proposes 18.5 acres of solar PV panels that would be capable of generating up to 3.0 megawatts (MW) of electricity. The Garner site proposes 5.2 acres of solar PV panels and would be capable of generating up to 1.0 MW of electricity. The third party vendor is anticipated to start construction in early 2017, with construction duration lasting approximately three and a half months (12-16 weeks).

Solar PV modules would be installed on a steel pole and oriented in rows reflecting a standard and uniform appearance across each site. For solar tracking, motors would be installed to tilt/turn each module allowing it to track the sun from east to west. At noon, solar panels are horizontal and facing straight up. At horizontal tilt (noon), the panels are approximately 5 feet above grade. Under other tracking conditions, the high point of each module is approximately 7.5 feet above grade. The panels are covered with an anti-reflective coating and appear dark blue in daylight and black in low light or night conditions.

Project Location: The Scheuer site is located immediately north of East 6th Street; west of the Warm Creek channel; east of Waterman Avenue; and south of East 9th Street within the City of San Bernardino. The Garner site is located immediately north of East 5th Street; west of Pedley Road; east of the Warm Creek channel; and south of East 6th Street within the City of San Bernardino.

FINDING

Based on the attached Initial Study and all documents referenced, the project described above will not have a significant effect on the environment in that the attached initial study identifies one or more potentially significant

effects on the environment for which the City of Riverside Public Utilities Department, before release of this MND, has made or agrees to make project revisions that clearly mitigate the effects to a less than significant level.

MITIGATION MEASURES INCLUDED IN THE PROJECT TO REDUCE OR AVOID POTENTIALLY SIGNIFICANT EFFECTS TO A LESS THAN SIGNIFICANT LEVEL

Aesthetics

MM VIS-1: The project applicant shall provide the City of San Bernardino a Landscaping/Screening Conceptual Plan consistent with City of San Bernardino Development Code Chapter 19.28 (Landscaping Standards) for review and approval.

Biological Resources

MM BIO-1: Employees shall be trained to ensure that all workers on-site (including contractors) are aware of all applicable mitigation measures for biological resources. Specifically, workers shall be required to: (1) limit all activities to approved work areas; (2) pick up and properly dispose of any food, trash or construction refuse; and (3) report any spilled materials (oil, fuel, solvent, engine coolant, raw concrete, or other material potentially hazardous to wildlife) to the site supervisor.

MM BIO-2: All trash and food materials shall be properly contained within vehicles or closed refuse bins while on any site, and shall be regularly removed from the site (at least on a weekly basis) for proper disposal. All refuse from construction activities shall be removed from the work site upon completion of work. No raw cement, concrete or washings thereof, asphalt, paint, oil, solvents, or other petroleum products, or any other substances that could be hazardous to vegetation or wildlife resources, shall be disposed of on-site or allowed to spill onto soil.

Cultural Resources

MM CR-1: In the event that unanticipated resources are encountered during ground-disturbing or other construction activities, work must cease within 50 feet of the discovery and a County Cultural Resources Specialist and tribal representatives from San Manuel Band of Mission Indians, Soboba Band of Luiseno Indians and Gabrieleño Band of Mission Indians notified by phone and email. Work may continue only after the resources are recorded and evaluated by a cultural resources specialist who meets or exceeds the Secretary of the Interior Professional Qualification Standards in archaeology and examined tribal representatives qualified to identify tribal cultural resources as defined in AB 52 (PRC § 21080.3.1(a)).

MM CR-2: In accordance with Section 7050.5 of the California Health and Safety Code and PRC Section 5097.98, if human remains are found, the San Bernardino County Coroner shall be notified within 24 hours of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie potential remains shall occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains do not require an assessment of cause of death and that the remains are or are believed to be Native American, the Coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours. In accordance with Section 5097.98 of the California Public Resources Code, the NAHC must immediately notify those persons it believes to be the Most Likely Descendent (MLD) of the deceased Native American. The descendants shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the County, the disposition of the human remains.

MM CR-3: Ground-disturbing activities related to construction, which extend 1 foot below the modern ground surface, shall be monitored by a cultural resources monitor. Monitoring shall be conducted by a qualified archaeologist familiar with the types of historical and prehistoric resources that could be encountered within the approved project area, and under direct supervision of a cultural resources specialist who meets or exceeds the Secretary of the Interior Professional Qualification Standards in archaeology.

- Scheuer: Full time monitoring within 10 feet of historic Warm Creek Channel. Part-time monitoring at all other locations where disturbance extends below 1 foot.
- Garner: Full time monitoring.

In the event cultural resources are identified by the qualified archaeological monitor at either site, the three Native American tribes who have expressed an interest in the site shall be notified. One Native American monitor shall be arranged to monitor further activities. In the event the City and the interested Tribes cannot agree upon the monitor, then the City shall select a monitor and arrange for that monitor. The intensity of Native American monitoring (full or part time) will be determined by both tribal and archaeological specialists, based on the nature of the find and the possibility of finding additional resources.

MM CR-4: The cultural resources monitor shall document interim results of the construction monitoring program with daily monitoring logs and photographs. At the conclusion of monitoring a summary of the results shall be prepared.

- If no resources were identified, copies of the daily logs and a brief letter report summarizing the monitoring activities will be submitted to the project owner and the CEQA lead agency.
- If resources were identified during monitoring, a cultural resources report shall be prepared and all work must be halted within 50 feet of the discovery. The report shall be written by or under the direction of a cultural resources specialist who meets or exceeds the Secretary of the Interior Professional Qualification Standards in archaeology and shall be provided in the State of California Archaeological Resource Management Report format. The final document shall report on all field activities including dates, times and locations, results, samplings, and analyses. All Department of Parks and Recreation (DPR) 523 forms, data recovery reports, and any additional research reports shall be included as appendices. This report shall be submitted to the project owner, the CEQA lead agency and the California Historical Resource Information System (CHRIS).
- Any information gathered during tribal AB 52 consultation may not be shared with the public without prior written tribal consent. The report will conform with these confidentiality requirements (PRC § 21080.3.2).

MM CR-5: The project owner shall invite the Gabrieleno Band of Mission Indians – Kizh Nation ("Gabrieleno") to the project kickoff/pre-construction meeting where the project schedule will be outlined in detail. The project owner will notify the Gabrieleno 5 business days prior to pre-construction meeting and commencement of ground disturbing work in order to provide them an opportunity to assign a tribal monitor to visit the site. Ground-disturbing activities related to construction - including but not limited to pavement removal, pot holing or auguring, boring, grading, excavation and trenching - may be monitored full-time by one tribal monitor per project site. Gabrileno to provide at their cost, the tribal monitor. Gabrieleno to provide at their cost, the tribal monitor shall receive proper safety training and execute an Agreement to Release All Liability.

Hazards/Hazardous Materials

MM HAZ-1: The applicant shall prepare a hazardous materials business plan to ensure proper storage, transport, and disposal of hazardous waste generated at each proposed project site during construction. An alternate or amended business plan shall be prepared for waste generated at the site during operation. At a minimum, the hazardous materials business plan shall be in compliance with California Health and Safety Code Chapter 6.5. The plan shall comply with all future revisions and updates to the regulations. Such a plan would enable workers to respond to any potential release of hazardous materials and ensure quick and safe cleanup. The plan shall include measures to implement emergency response procedures to reduce the potential for contamination and exposure of workers or the public to hazardous materials in the event of an accidental spill, by providing various measures to ensure that any spilled material is contained and any resulting surficial contaminated soil was quickly cleaned up and disposed of properly. The plan will be provided to the City of Riverside and the City of San Bernardino within 30 days of the start of construction.

Hydrology/Water Quality

MM WQ-1: The applicant shall prepare and implement a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP shall:

- Identify water quality Best Management Practices (BMPs) to minimize erosion and to guide the clean-up • of any accident, per the California Stormwater BMP Handbook;
- Identify potential pollutant sources that may affect water quality; and
- Identify monitoring and reporting procedures to ensure all BMPs are adhered to during construction and • operations.

MM WQ-2: The applicant shall review the final site plan prior to construction to verify that all staging areas, PV arrays, and other associated equipment are to be located outside of the 100-year flood plain as mapped by the Federal Emergency Management Agency. If any structures are proposed within the flood plain, the applicant will revise the site plan prior to construction to relocate those structures outside of the flood plain.

AUTHORITY TO PREPARE A MITIGATED NEGATIVE DECLARATION

As provided in the California Environmental quality Act (CEQA) § 21064.5, an MND may be prepared for a project subject to CEQA "when the Initial Study has identified potentially significant impacts to the environment, but revisions in the project plans or proposal as made by, or agreed to by, the applicant before the proposed negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a pint where clearly no significant effect on the environment would occur, and there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment".

The City of Riverside is the lead agency under CEQA and is responsible for planning and implementation of the proposed project. Based on the findings for the Environmental Study Checklist that was prepared for this project. the City of Riverside has determined that preparation of a Mitigated Negative Declaration is the appropriate method by which to obtain compliance with CEQA. The Environmental Study Checklist is included in this Mitigated Negative Declaration. Based on this Environmental Initial Study Checklist, Aesthetics, Biological Resources, Cultural Resources, Hazards/Hazardous Materials, and Hydrology/Water Quality are anticipated to have a potentially significant impact without mitigation. However, proposed mitigation measures reduce impacts to below a level of significance.

PUBLIC REVIEW DISTRIBUTION

In addition to the State Clearinghouse, notice of the Mitigated Negative Declaration was published in the Press-Enterprise, San Bernardino Sun, and distributed to the owners of parcels adjacent to the proposed project.

RESULTS OF PUBLIC REVIEW

() No comments were received during the public input period.

()Comments were received but did not address the draft Mitigated Negative Declaration finding or the accuracy/completeness of the Initial Study. No response is necessary. The letters are attached.

Comments addressing the findings of the draft Mitigated Negative Declaration and or accuracy or (X) completeness of the Initial Study were received during the public input periods. Letters and responses follow,

Copies of the draft Mitigated Negative Declaration and the Initial Study materials are available for review at the City of Riverside Public Utilities Department, Water Division, 3750 University Avenue, 3rd Floor, Riverside, CA 92501.

Ghrish Balachandran Public Utilities General Manager City of Riverside

11/21/16

LETTER



STATE OF CALIFORNIA GOVERNOR'S OFFICE OF PLANNING AND RESEARCH STATE CLEARINGHOUSE AND PLANNING UNIT



GOVERNOR February 26, 2016

> Matthew Bates City of Riverside 3750 University Avenue, 3rd Floor Riverside, CA 92503

Subject: Scheuer and Garner Solar Power Facility SCH#: 2016021027

Dear Matthew Bates:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. The review period closed on February 25, 2016, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely

Scott Morgan Director, State Clearinghouse

1) Comment: The commenter confirms that no state agency has provided comments on the Draft MND and that compliance with the State Clearinghouse review requirements has been met pursuant to CEQA.

RESPONSE

Response: No response required.

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044 (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

LETTER

A confidential comment letter on the Draft MND was received on February 09, 2016 from the Gabrieleno Band of Mission Indians – Kizh Nation regarding tribal interests. Due to requested confidentiality by the commenter, the contents of this letter are not published.

RESPONSE

Comment: This comment letter requests that one of the Tribe monitors be present during all ground disturbances.

Response: Mitigation Measures CR-5 has been added to address this comment.

LETTER

A confidential comment letter on the Draft MND was received on February 26, 2016 from the Soboba Band of Luiseno Indians regarding tribal interests. Due to requested confidentiality by the commenter, the contents of this letter are not published.

RESPONSE

Comment: This comment letter requests the addition of another cultural resources mitigation measure regarding the treatment and disposition of unanticipated finds.

Response: Existing Cultural Resource Mitigation Measures address the Tribe's request.

ELECTRONIC MAIL

From: Ed Bonadiman [mailto:ed@bonadiman.com] Sent: Thursday, February 18, 2016 1:36 PM To: Bates, Matthew; Jerry Jaeckels (jerryjttd@gmail.com) Subject: [External] Scheuer Solar Site

Hi Matthew,

Our client owns the LKQ Wrecking Yard west of the proposed Scheuer solar facility in San Bernardino. He is in receipt of your notice for the solar sites, and would like to communicate the following:

1.	The wrecking yard is finishing up grading operations in the next couple months. They may have	-1
som	e excess dirt that you can use for your solar project. Let us know.	
2.	In 2010 we obtained a Drainage Acceptance Letter from the City of Riverside for our historic	 ~
drai	nage. (see attached) Please take this into consideration on your design. It appears that you are	2
fillir	g in the existing historic drainage ditch. (see attached Exhibit A)	
3.	How do you plan on dealing with your drainage? New basin?	-3
4.	Theft is a constant problem for my client. You might want to install electric fencing around your	 4

facility before all of the panels disappear.

He is happy to see your project go in. Please feel free to contact us any time.

Thanks!

Ed

Edward J. Bonadiman, M.B.A., P.L.S. President Joseph E. Bonadiman & Associates, Inc. 234 North Arrowhead Avenue San Bernardino, CA 92408 ph (909) 885-3806 x132 cell (909) 771-6430 fax (909) 381-1721

RESPONSES

1) Comment: The commenter states they may have fill material available for the project. No comments were provided on the adequacy of the Draft MND.

Response: The Scheuer and Garner sites are balanced, with little to no fill expected during grading.

2) Comment: The commenter provides background regarding fill of historic drainages from the City of San Bernardino. No comments were provided on the adequacy of the document.

Response: The project applicant has performed a hydrology study for the Scheuer site, with the project adding a drainage basin to the south of the proposed solar array.

3) Comment: The commenter asks how drainage will be handled at the Scheuer site. No comments were provided on the adequacy of the Draft MND.

Response: The project will install a new drainage basin at the start of the project during the grading phase to the south of the proposed solar array.

4) Comment: The commenter states theft is a concern in the area. No comments were provided on the adequacy of the Draft MND.

Response: As part of the project, exterior fencing will be installed (it will not be electrified). Additionally, signage will be posted warning about electrical power output of the system. During construction, when the solar PV array is on-site, security will be present until the arrays have been installed.

Riverside Public Utilities Department Water Division



Draft Final Mitigated Negative Declaration

1. Project Title:Scheuer and Garner Solar Power Facilities

2. Meeting Date: <u>December 13, 2016 at 6:30 P.M. To be scheduled</u>

- Lead Agency: City of Riverside Public Utilities Department, Water Division 3750 University Ave., 3rd Floor Riverside, CA 92501
- **4. Responsible Agency:** City of San Bernardino 300 North D Street San Bernardino, CA 92418
- 5. Contact Person:
Phone Number:Matthew Bates, Utilities Senior Water Engineer
951-826-5116
- 6. **Project Location:** <u>Scheuer Site</u>: Located immediately north of East 6th Street; west of the Warm Creek channel; east of Waterman Avenue; and south of East 9th Street (refer to Figure 1 within Attachment A) within the City of San Bernardino. The site encompasses APNs: 0278-161-30, 0278-181-12, 0278-181-19, & 0278-161-29.

<u>Garner Site</u>: Located immediately north of East 5th Street; west of Pedley Road; east of the Warm Creek channel; and south of East 6th Street (refer to Figure 1 within Attachment A) within the City of San Bernardino. The site encompasses APNs: 0279-041-14, 0279-041-15, & 0279-041-08.

7. Project Applicant/Project Sponsor's Name and Address:

SunPower Corporation 2125 E Katella Ave #220 Anaheim, CA 92806

- 8. General Plan Designation: <u>Scheuer Site</u>: Single Family Residential <u>Garner Site</u>: Multiple Family Residential
- 9. Zoning: <u>Scheuer Site</u>: RS Residential Suburban (4.6 dwelling units/acre) <u>Garner Site</u>: RM – Residential Medium (14 dwelling units/acre)

Description of Project: The proposed project includes the construction, operation, maintenance, and demolition of two solar photovoltaic (PV) electrical generating facilities on property owned by the City of Riverside (RPU). The

Scheuer site is 18.5 acres in size and the proposed solar array would be capable of generating up to 3.0 megawatts (MWac) of electricity. The Garner site is 5.2 acres and would be capable of generating up to <u>1.00.75</u> MWac of electricity. Generated power would support RPU water operations and production to minimize overall energy demand and greenhouse gas emissions. Within Attachment A, Figure 1 shows the site locations, while Figures 2 and 3 depict conceptual site plans of the proposed Scheuer and Garner Solar Power Facilities (Project), respectively. The Scheuer site and the Garner site located within the jurisdictional boundary of the City of San Bernardino.

RPU will enter into a Power Purchase Agreement to construct, operate, maintain and potentially demolish the proposed project. The layout of each facility may be adjusted in the future to accommodate the final engineering design, but the proposed project would remain within the project site boundaries shown on Figures 2 and 3. Figures 2 and 3 present a conceptual site plan for each of the Scheuer and Garner sites showing both the project footprint and the proposed location of the solar modules and support facilities that would be installed as part of the project. A PV solar module is a packaged, connected assembly of solar panels. The Scheuer site would include approximately 8,640 total solar panels installed within the site, while the Garner site includes approximately 2,160 total solar panels installed. To ensure the safety of the public and the facility, a chain-link fence would be installed around the perimeter of both site boundaries for the duration of construction and operation, with access provided by a secured gate.

Solar PV modules are installed in rows on mounting systems and track the sun from east to west. The foundations are typically steel piles, which are driven into the soil using pneumatic techniques similar to hydraulic pile driving to a maximum depth of 9 feet. Once the foundations have been installed, a tracking system is installed to support each row of PV modules. For solar tracking, motors would be installed to drive the tracking mechanism. The PV design block would be oriented in rows reflecting a standard and uniform appearance across each site. At full tilt, the low point is approximately 2.5 feet above grade and the high point is approximately 7.5 feet above grade. At noon, solar panels are horizontal and facing straight up. At horizontal tilt (noon), the panels are approximately 5 feet above grade. The panels are covered with an anti-reflective coating to reduce glare and appear dark blue in daylight and black in low light or night conditions. However some noticeable glare may occur.

Modules would be electrically connected into strings. Each string would be funneled through light gauge steel cable tray to combiner boxes located throughout the solar field power blocks. The output power cables from the combiner boxes would again be consolidated and feed the DC (direct current) to inverters, which convert the DC to AC (alternating current). Each inverter would be fully enclosed and pad mounted, standing approximately 95 inches (~8 feet) in height. The AC output of inverters would be fed via underground cable into the low-voltage side of the inverter step-up transformer. The underground electrical cables would be installed using standard trenching/boring techniques approximately 3 feet deep. The electricity produced by the Scheuer facility would be connected to the local electric grid via an existing transmission line located at the northeastern boundary of the site. The electricity produced by the Garner facility would be connected to the existing customer meter.

<u>General Construction Scenario</u>. Construction is expected to take approximately three and a half months (12-16 weeks). Open areas within each project site would be used for construction staging. All construction access and egress would occur from a secured controlled main gate located at each site entrance on East 6th Street. The maximum number of construction employees on each site at any one time is forecast to be 20 persons and the maximum number of truck deliveries of equipment and material would be 10 trucks per day to each site. Construction would occur Monday through Saturday between the hours of 7:00 a.m. and 8:00 p.m., with no work occurring on Sundays or holidays (consistent with City of San Bernardino Municipal Code Section 8.54.070, as discussed later in Section 9 [Noise] of the Initial Study).

Project construction would consist of three major phases at each site:

- 1. Site preparation
- 2. PV system installation, testing, and startup
- 3. Site cleanup and restoration

<u>Site Preparation.</u> Construction of each PV facility would begin with initial clearing, grubbing, and selected grading of the site. Vegetation from the site and all trees within the solar array boundary that could shade solar panels would be removed. The maximum disturbance area during site clearing and grubbing at the Scheuer site in the same day is 5 acres per site (with the entire Garner site, which is 5.2 acres, potentially disturbed in the same day). Internal access roads would be graded sufficiently to bring equipment, materials, and workers to the areas under construction. The onsite staging areas would typically include construction offices, a first aid station and other temporary buildings, worker parking, truck loading and unloading facilities, and an area for assembly. Buried electrical lines, PV array locations, and the locations of other facilities may be flagged and staked to guide construction activities. Best management practices (BMPs) for erosion control during site preparation would be employed during installation of initial erosion and sedimentation controls. In addition, water truck refilling stations (as required) may be established for dust control.

<u>PV System Installation, Testing, and Start-up.</u> PV system installation may require some earthwork, including grading, fill, compaction, and erosion control implementation as well as erection of the PV modules, supports, and associated electrical equipment. Construction of the PV arrays would include installation of support beams, module rail assemblies, PV modules, inverters, transformers, and buried electrical cables. System installation would begin with teams installing the panel mounting and steel pier support structures. The exact design would be finalized pending specific soil conditions. The foundation methods would include pneumatically driven piles. This activity would be followed by panel installation and electrical work. Concrete would be required for pads for the switchgear, inverters, and transformers. Concrete would be produced at an off-site location by a local provider and transported to the project site by truck.

<u>Site Cleanup and Restoration</u>. Once completed, the site would be cleaned of all debris and construction equipment. The site would then be hydroseeded in accordance with the project Stormwater Pollution Prevention Plan (SWPPP) to achieve site stabilization and reduce the potential for soil erosion or the loss of topsoil. <u>Public areas, such as curb and roadway at each site ingress/egress point as well as areas outside the final fencing/landscaping area, will be restored to existing conditions.</u>

<u>General Operation and Maintenance Scenario.</u> Each proposed facility would be monitored remotely on a continuous basis. The project would be designed with a Data Acquisition (DAS) system for remote monitoring of facility operation. Within each site, fiber optic or other cabling required for the monitoring system would be installed throughout the solar field leading to a centrally located (or series of appropriately located) telecommunication cabinets. The telecommunications connections to the DAS system cabinets are either wireless or hard wired.

No personnel would be on-site during the majority of hours of operation. As the PV arrays produce electricity passively with minimal moving parts, maintenance requirements would be limited. Periodic maintenance of each solar facility would include technicians visiting the site for inspection and performing any necessary maintenance activities. Any required planned maintenance would be scheduled to avoid peak load periods, and unplanned maintenance would occur as needed depending on the event. The proposed operator of the facility, SunPower, utilizes robots for washing solar panels. This system uses a minimal amount of fluid (less than a pint of water) to clean each panel. Local water would be used with no chemicals added.

<u>General Solar Project Decommissioning Scenario</u>. The project may be decommissioned as determined by RPU. All decommissioning and restoration activities would adhere to the requirements of the appropriate governing authorities and would be in accordance with all applicable federal, State and local regulations. The applicant would employ a collection and recycling program to dispose of the site materials.

10. Surrounding land uses and setting: Briefly describe the project's surroundings:

Scheuer Site	Garner Site			
Adjacent General Plan Designations:	Adjacent General Plan Designations:			
North: Industrial	North: Open Space/Public Quasi-Public and San			
	Bernardino County lands			

	Scheuer Site	Garner Site				
East:	Open Space/Public Owned Flood Channel	East: San Bernardino County lands (Multiple				
		Family Residential)				
South:	San Bernardino County lands (Public and	South: San Bernardino County lands (Public and				
	Quasi-Public/Multiple Family Residential)	Quasi-Public/Multiple Family Residential)				
West:	Industrial	West: San Bernardino County lands (Public and				
		Quasi-Public)				
Adjace	ent Zoning:	Adjacent Zoning:				
North:	IL – Industrial Light	North: PP/PF – Public Park and Public Facility				
East:	RS/PP – Residential Suburban and Public Park	East: RM – Residential Medium				
South:	RS/RM – Residential Suburban/Residential	South: RM and PF – Residential Medium and Public				
	Medium	Facility				
West:	IH – Industrial Heavy	West: RS – Residential Suburban				

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

Based on the amount of area that would be disturbed for each facility (approximately 18.5 acres for Scheuer and 5.0 acres for Garner), the project would be subject to the requirements established in a Construction General Permit issued by the State Water Resources Control Board. A SWPPP would be prepared by the applicant and monitored by the Santa Ana Regional Water Quality Control Board (RWQCB), Region 8. No additional permits are expected to be required pursuant to Section 401 of the Clean Water Act and the Porter-Cologne Water Quality Control Act, or Section 404 of the Clean Water Act, or pursuant to Section 1602 of the California Fish and Game Code.. The City of San Bernardino would use the adopted MND (and this Initial Study) as a responsible agency in issuing any required permits for the Project such as fire protection..

12. Documents used and/or referenced in this review:

 a. California Air Pollution Control Officers Association (CAPCOA). Model Policies for Greenhouse Gases in General Plans. June 2009. [online: http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-ModelPolicies-6-12-

[online: http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-ModelPolicies-6-12-09-915am.pdf]

- b. California Air Resources Board (CARB). Almanac Emission Projection Data 2015 Estimated Annual Average Emissions for the Mojave Desert Air Basin. [online: http://www.arb.ca.gov/app/emsinv/2013/emssumcat.php]
- c. California Department of Conservation (DOC). Farmland Mapping and Monitoring Program Survey Area. [online: http://www.conservation.ca.gov/dlrp/fmmp/overview/Pages/survey_area_map.aspx]
- d. DOC. The California Land Conservation Act 2014 Status Report. March 2015. [online:

http://www.conservation.ca.gov/dlrp/lca/stats_reports/Documents/2014%20LCA%20Status%20Report_March_2015.pdf]

- e. DOC. California Important Farmland Finder. [online: http://maps.conservation.ca.gov/ciff/ciff.html]
- f. DOC: San Bernardino County Williamson Act FY 2012/2013, Sheet 2 of 2. 2013. [online: ftp://ftp.consrv.ca.gov/pub/dlrp/wa/sanbernardino_so_12_13_WA.pdf. Accessed August 25, 2015]
- g. California Department of Forestry and Fire Protection (CAL FIRE). San Bernardino County: Fire Hazard Severity Zones.

[online: http://www.fire.ca.gov/fire_prevention/fhsz_maps_sanbernardinosw.php]

- h. California Department of Toxic Substances Control. Hazardous Waste and Substances Sites (Cortese) List. [online: http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm]
- i. California Department of Transportation (Caltrans). Guide for the Preparation of Traffic Impact Studies.
- j. Caltrans. Scenic Highway Mapping System.

[online: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm]

- k. Caltrans. Traffic Volumes on the California State Highway System. 2014. [online: http://traffic-counts.dot.ca.gov/2014all/]
- City of San Bernardino General Plan. 2005. [online: http://www.sbcity.org/cityhall/community_development/planning/planning_documents.asp]
- m. City of San Bernardino General Plan EIR. [online: http://www.sbcity.org/cityhall/community_development/planning/planning_documents.asp]
- n. City of San Bernardino Interactive Zoning and General Plan Maps. [online: http://www.sbcity.org/cityhall/infotech/gis___mapping/default.asp]
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- aa. State Water Resources Control Board. Storm Water Program: Construction Storm Water Program. [online: <u>http://www.swrcb.ca.gov/water_issues/programs/stormwater/construction.shtml]</u>
- bb. SunPower. Hydrology Study for Riverside Public Utilities (Scheuer Site) Sixth Street San Bernardino, CA. October 2, 2015.
- cc. Aspen Environmental Group. CalEEMod Air Quality Calculations for Scheuer and Garner Solar Projects. September 2015.
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- ee. Aspen Environmental Group, Cultural Resources Monitoring Justification Report, October 6, 2015

13. Acronyms

AC –	Alternating Current
AQMP –	Air Quality Management Plan
CAAQS –	California Ambient Air Quality Standards
CARB –	California Air Resource Board
DC –	Direct Current
DOC –	California Department of Conservation
DPM –	Diesel Particulate Matter
GHG –	Greenhouse Gas
LOS –	Level of Service
LST –	Localized Significance Thresholds
MDAB –	Mojave Desert Air Basin
MW –	Megawatts
MRZ –	Mineral Resource Zone
NAAQS –	National Ambient Air Quality Standards
PV –	Photovoltaic
RPU –	Riverside Public Utilities Department
RWQCB –	Regional Water Quality Control Board
SCADA –	Supervisory Control and Data Acquisition
SCAQMD -	South Coast Air Quality Management District
SRA –	Source Receptor Areas
SWPPP –	Stormwater Pollution Prevention Plan

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 & Forest Resources	Air Quality
Biological Resources	Cultural Resources	Geology/Soils
Greenhouse Gas Emissions	Hazards & Hazardous Materials	Hydrology/Water Quality
Land Use/Planning	Mineral Resources	Noise
Population/Housing	Public Service	Recreation
Transportation/Traffic	Utilities/Service Systems	Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation which reflects the independent judgment of the City of Riverside, it is recommended that:

The City of Riverside finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

The City of Riverside finds 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.

The City of Riverside finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

The City of Riverside finds 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.

The City of Riverside finds 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

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Printed Name & Title __Girish Balachandran, Public Utilities General Manager

Date 1124/16

For: City of Riverside

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Riverside Public Utilities Department Water Division

Environmental Initial Study

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) 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 (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. **Impacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. **Mitigation Measures.** For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measure 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) 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 (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS.				
Would the project: a. Have a substantial adverse effect on a scenic vista?				\square
1a. Response: (Source: City of San Bernardino General Plan EIR p.: Scenic Resources)	5.1-13 – Sceni	C Vistas and C	orridors, p.5.	
The proposed project site is located in a developed area and is bounder lands. The project would be visible to viewers along adjacent roadway are identified within the project sites or in the area surrounding each s	ys and residen	ces. However,	no designated	
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				\boxtimes
1b. Response: (Source: Caltrans Scenic Highway Mapping System)				
State Highway 330, which is located approximately 2.75 miles north highway. The proposed project would not affect any scenic resource historic buildings in the work area; there are no rock outcroppings in the work area. No impacts are anticipated	s on a State s	cenic highway	. Additionally	, there are no
c. Substantially degrade the existing visual character or quality of the site and its surroundings?				
1c. Response:		·		
Residential development occurs to the northeast of the Scheuer site Because both sites are currently undeveloped, views in all directions ruderal (weedy) vegetation located on the site. Line-of-sight through areas, or industrial developments in the foreground view. Currently, that distinguish it from the immediate surrounding area. The visual ch of each PV facility on the property. The project would create new vie within each site. While the Warm Creek channel would separate the f both facilities. While the development of the project would change th and contrast is not considered to be a substantial degradation of the s impact of visual changes from adjacent residential viewsheds, Mitigan to install fencing and landscaping. Implementation of MM VIS-1 would	consist of related by project sites do the sites of a small-facilities, some visual character of each site's existing site in Measure of the site site of the site site site sites and the site sites and the site sites and the site sites and the s	tively flat ope ite reveals adja not contain an h site would cl- engineered in- e adjacent view cter of each pr visual characte (MM) VIS-1 re pacts to less t	n space dirt w icent open spa y particular sc hange due to th dustrial solar e vsheds would oject site, the er. To mitigate equires the pro-	ith only some ce, residential cenic qualities he installation energy facility likely contain visual change any potential ject applicant
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				
1d. Response:				
The proposed solar panels are designed to reduce glare; however some impacts, of greatest concern is reflection or glare observed by drivers. to track the sun from east to west all glare would occur either east roadways east or west of the sites, therefore, any minor and momenta Furthermore, perimeter screening (as discussed under Response 1c a glare spreading outside the site boundary. In the event exterior lighting is included as part of the proposed proj minimum brightness and shielded to avoid light spillage off the so sensitive uses. Lighting installed within this manner would avoid light	Because the s or west of the ary glare is no nd required b ect for securit lar facility sit	olar panels sit e site. Both sit t expected to o y MM VIS-1) y purposes, all te onto adjace	flat in the nor e do not have create a hazaro would reduce l exterior light nt residences	th-south plane any adjacent to motorists. any potential ing will be of

Implementation of MM VIS-1 would reduce light impacts to a less than significant level.

	SUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
_					
2.	AGRICULTURE AND FOREST RESOURCES:				
	In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California 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 effect, lead agencies may refer to information complied 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 the forest Protocols adopted by the California Air Baseurge Baserd World the amigati				
	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?				
ratin hav No The Stat	e California Department of Conservation (DOC) has established a ngs and current land use to identify categories of Important Farm e been surveyed by the DOC to determine the status of agricultura Prime Farmland, Unique Farmland, or Farmland of Statewide Imp e nearest Farmland, approximately 300 feet northeast of the Garr sewide Importance. This parcel is currently utilized as a comm struction and operation would be located at or adjacent to this Farm of the parcel. No impacts are anticipated.	aland. Current al land resource portance would ner site, is a f munity garde	ly, 98 percent es. ld be located a 10-acre parcel n. No activiti	of the State's t the proposed designated as tes associated	private lands l project sites s Farmland of with project
	b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				
Coi The priv app The con	Response: (Source: DOC California Land Conservation Act 20 anty Williamson Act FY 2012/2013, Sheet 2 of 2; City of San Berna Williamson Act (i.e., California Land Conservation Act of 1965) vate landowners for the purpose of restricting specific parcels of 1 roximately 4,542 acres of San Bernardino County lands were enro proposed project sites have been classified by the DOC as non-V tracts located within four miles of the project sites. The project sites (i.e., RS- Residential Suburban, RM- Residential Medium), not fo c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g))	ardino Zoning) enables loca land to agricu olled in the La Williamson A ss are zoned by or agricultural	and GPLU M l governments iltural or relate nd Conservation ct Land, and the the City of Sa	<i>tap)</i> to enter into ed open space on Act Program here are no W an Bernardino	contracts with use. In 2012, m. 'illiamson Act for residential

Potentially Significant Impact		Less Than Significant Impact	No Impact
U Map; Google	_	_1	<u> </u>
	o forest land or	timberland is I	ocated in the
ind			
U Map; Google	e Earth)		
the vicinity of	the project. No	o importe oro	anticinated
ch,	the project. The		anneipateu.
of est			
der, San Berna	rdino County W	Villiamson Act	FY
	ite staging areas d operation of		
the ict 1ld			
		\square	
strict – 2007 Ai	ir Quality Mana	igement Plan)	
t (SCAQMD). The solution of the second secon	of this project, it implementation	Id produce lim on. The SCAQ d to bring the fornia Ambien throl measures n refiners and r ch are then us ents. Therefore ed AQMP con t would not exc of the State Im	ited emissions MD 2007 Air MDAB into MDAB into at Air Quality and clean fuel etailers. ed to regulate , the proposed trol measures. ceed the future nplementation
control forect nplementati with or obstru	cast ion uct	casts for all approve on of this project, it uct implementation	casts for all approved AQMP con- tion of this project, it would not exc uct implementation of the State In applicable AQMP. This impact

b.	Violate any air quality standard or contribute substantially to		\square	
	an existing or projected air quality violation?			

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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3b. Response: (Source: California Air Resources Board – Almanac Emissions Projections for MDAB)

The proposed project's construction emissions would be temporary, would be distributed over both project sites (23.7 acres), and would not be of a magnitude (see the emissions summary under Response 3c) that could cause new ambient air quality violations or substantially contribute to existing violations. The project's maximum daily construction criteria pollutant emissions are less than 0.01 percent of the 2015 MDAB emissions inventory for all pollutants. Additionally, construction is a short-term activity that would not affect long-term projections for air quality attainment. With compliance with all SCAQMD rules and regulations, the project's construction emissions would not cause a violation or substantially contribute to any violations of air quality standards.

The project's operation emissions would be limited to occasional inspections and panel washing events and from power needed for array tracking motors. Emissions from these sources are minimal (see the emissions summary below under Response 3c) and would not be of a magnitude that could cause new ambient air quality violations or substantially contribute to existing violations. The project's maximum daily operation criteria pollutant emissions are less than 0.001 percent of the 2015 average daily MDAB emissions inventory for all pollutants. Additionally, project operation would displace the need for fossil fuel fired electricity generation that would reduce criteria pollutant emissions, much of which may be generated within the MDAB. Therefore, the project's operation would not cause a violation or substantially contribute to any violations of air quality standards. This impact would be **less than significant and no mitigation is required.**

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

3c. Response: (Source: SCAQMD – Rules; SCAQMD – Air Quality Significance Thresholds)

The SCAQMD has regulations for visible emissions, nuisance emissions, and fugitive dust emissions with which the project's construction would need to comply. The specific regulations are as follows:

- SCAQMD Rule 401 Visible Emissions,
- SCAQMD Rule 402 Nuisance Emissions, and
- SCAQMD Rule 403 Fugitive Dust

These rules limit the visible dust emissions from construction sites, prohibit emissions that can cause a public nuisance, and require the prevention and reduction of fugitive dust emissions to the extent possible. Construction emissions were estimated using CalEEMod. Fugitive dust emissions reduction measures (i.e., watering the site and unpaved access roads, reduced vehicle speeds on unpaved areas) are necessary and shall be incorporated during construction to comply with SCAQMD Rule 403.1. It is assumed that construction of both facilities would occur simultaneously or overlap. Therefore, construction emissions were calculated for both projects together to present a worst-case scenario.

The following provides the maximum daily emission estimates for construction of the total project (Scheuer and Garner projects combined). As shown, none of the pollutant emissions during construction exceed SCAQMD emissions significance thresholds. Therefore, no mitigation beyond the required compliance applicable rules and regulations is proposed, and the proposed project's construction would not contribute significantly to a cumulatively considerable net increase of any criteria pollutants.

CalEEMod MODEL RESULTS CONSTRUCTION IMPACTS SCHEUER AND GARNER								
			Daily Em	issions (lbs/da	ay)			
Activity	VOC	NOx	СО	SOx	PM10	PM2.5		
Daily Project Emissions - Construction	11.27	95.88	79.38	0.14	17.18	6.17		
SCAQMD Daily Thresholds Construction	75	100	550	150	150	55		
Y/N - Exceeds Threshold?	NO	NO	NO	NO	NO	NO		

The proposed project's operation is limited to inspection activities and panel cleaning events and from power needed for array tracking motors. The emission estimates for these operations and maintenance activities are provided below for each of the Scheuer and Garner sites individually. As shown, project operation emissions are minimal and are well below SCAQMD emissions significance thresholds. Therefore, the proposed project's operation would not contribute significantly to a cumulatively considerable net increase of any criteria pollutants.

ISSUES (AND SUPPORTING INFORMATION SOURCES):

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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CalEEMod MODEL RESULTS OPERATIONAL IMPACTS SCHEUER							
			Daily Em	issions (lbs/d	ay)		
Activity	VOC	NOx	СО	SOx	PM10	PM2.5	
Daily Project Emissions - Operational	0.10	0.77	0.69	0.00	5.72	0.68	
SCAQMD Daily Thresholds Operation	55	55	550	150	150	55	
Y/N - Exceeds Threshold?	NO	NO	NO	NO	NO	NO	

CalEEMod MODEL RESULTS OPERATIONAL IMPACTS GARNER							
A			Daily Em	issions (lbs/d	ay)		
Activity	VOC	NOx	СО	SO ₂	PM10	PM2.5	
Daily Project Emissions - Operational	0.00	0.01	0.01	0.00	0.15	0.02	
SCAQMD Daily Thresholds Operation	55	55	550	150	150	55	
Y/N - Exceeds Threshold?	NO	NO	NO	NO	NO	NO	

As shown in the tables above, both construction and operation of the proposed project would not exceed any SCAQMD daily emission threshold of significance and would not contribute significantly to a cumulatively considerable net increase of any criteria pollutants. Emissions from decommissioning would occur in the future once site is fully operational. Therefore, applicable regional and localized thresholds are not known and no conclusive significance determination can be completed at this time. However, temporary emissions are expected to be similar or less (due to better engine technologies) than those provided above for construction. Impacts would be **less than significant and no mitigation is required.**

d.	Expose	sensitive	receptors	to	substantial	pollutant		\boxtimes	
	concentr	ations?							

3d. Response: (*Source: SCAQMD* – *Local Significance Thresholds; SCAQMD* – *Rules*)

The nearest sensitive receptors to each project site include:

- Residences directly adjacent to the northeast corner of the Scheuer site; to the east and southeast of the Garner site.
- Monterey Elementary School located directly south of the Garner site.
- Palm Field Park directly northeast of the Garner site.

SCAQMD evaluates substantial pollutant concentrations of criteria pollutants (specifically NOx, CO, PM10, and PM2.5) by assessing the localized maximum daily project emissions against Localized Significance Thresholds (LSTs) that they have developed for different Source Receptor Areas (SRAs) within their jurisdiction. Both project sites are within SRA 34 – San Bernardino. The LST daily thresholds for NOx and CO emissions are higher than the regional thresholds evaluated in Response 3c. Therefore, the NOx and CO LST thresholds would not be exceeded and are not evaluated further.

It is assumed that construction of both facilities would occur simultaneously or overlap. Therefore, construction emissions were calculated for both projects together to present a worst-case scenario. The following presents the maximum daily onsite emissions of PM10 and PM2.5 during construction compared to their LST thresholds. As shown, construction of the proposed project would not exceed any applicable SCAQMD LST.

CalEEMod MODEL RESULTS CONSTRUCTION IMPACTS SCAQMD LST THRESHOLDS						
		ND GARNER				
Activity	PM10	ions (lbs/day) PM2.5				
Daily Project Emissions - Construction	5.89	5.04				
SCAQMD LST Significance Threshold	44	10				
Y/N - Exceeds Threshold?	NO	NO				

The following presents the maximum daily onsite emissions of PM10 and PM2.5 during project operation compared to their LST thresholds. As shown, operation of the proposed project would not exceed any applicable SCAQMD LST.

CalEEMod MODEL RESULTS OPERATIONAL IMPACTS SCAQMD LST THRESHOLDS						
-		EUER	-	NER		
Activity	Daily Emissi	ons (lbs/day)	Daily Emissions (lbs/day)			
2	PM10	PM2.5	PM10	PM2.5		
Daily Project Emissions - Operational	5.72	0.68	0.15	0.02		
SCAQMD LST Significance Threshold	11	3	11	3		
Y/N - Exceeds Threshold?	NO	NO	NO	NO		

Environmental Initial Study

INFORMATION SOURCES):	cant Significant oct With Mitigation Incorporated	Significant Impact	Impact
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The proposed project's emissions of toxic air pollutants would be minimal and would consist primarily of Diesel Particulate Matter (DPM) emissions during project construction activities. No other toxic air pollutant emissions sources, other than emissions from construction employees' personal vehicles, are proposed to be used during project construction or operation. Decommissioning period emissions of DPM are considered to be negligible given the technology improvements in both off-road equipment (Tier IV) and on-road vehicle engines that would be universally required by the time the project is decommissioned. A review of the emissions calculation results (see the emissions summary below under Response 3c) indicates that the onsite off-road equipment and the primarily off-site on-road vehicle tailpipe particulate emissions, which are both primarily DPM emissions would be emitted and then dispersed over each project site for the off-road equipment and over the entire travel routes for the on-road vehicles. Considering the low annual quantity of toxics emissions, their dispersion over the project sites and travel routes, and the distance from the project site to the nearest residential receptors, these emissions would not cause any local receptor to incur a risk.

Compliance with SCAQMD rules and regulations would reduce the fugitive dust emissions during proposed project construction and operation and reduce the associated particulate emissions and Valley Fever impacts to nearby receptors. The primary way to avoid Valley Fever is to limit exposure to the spores, and the construction methods and SCAQMD required dust control measures would limit the amount of excavation required and would provide significant control of the fugitive dust emissions during construction. The impacts during operation and decommissioning would be lower than those for construction. Therefore, it is concluded that the potential risk from Valley Fever infection due to the proposed project's construction, operation, and decommissioning would be less than significant.

The project would not expose sensitive receptors to substantial pollutant concentrations during construction, operation, or decommissioning. Impacts would be **less than significant and no mitigation is required**.

e. Create objectionable odors affecting a substantial number of people?		\boxtimes	
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3e. Response:

Some objectionable odors may be temporarily created during construction-related activities, such as from diesel exhaust. However, these odors would not affect a substantial number of people in the area and would only occur proximate to the work areas for a short time, likely contained within each project site. Similarly, the project's operation and decommissioning would not include the use of malodorous substances or activities that would cause significant odors. This is anticipated to be **less than significant and no mitigation is required**.

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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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4a. Response: (Source: City of San Bernardino General Plan- Figure NRC-1; City of San Bernardino General Plan Chapter 12; Jericho Systems, 2015)

The proposed project sites are located on vacant land that is surrounded by urban development in the City of San Bernardino. According to the City's General Plan, neither site would be located within designated critical habitat for the San Bernardino Kangaroo Rat or the Coastal California Gnatcatcher, nor would the sites be within the Cajon Creek Conservation Bank or the Delhi Sands Flower-loving Fly Colton Recovery Unit. No Biological Resource Management Area would be affected by the project.

Further, a habitat suitability assessment for the San Bernardino Kangaroo Rat (*Dipodomys merriami parvus*) and burrowing owl (*Athene cunicularia*) was conducted at both project sites in July 2015 by Jericho Systems. No wildlife was observed during the assessment, and the habitat suitability assessment determined that only non-native grasses, bare ground, and/or ruderal vegetation occurs at the sites (Jericho Systems, 2015). The habitat suitability assessment concluded that the non-native, ruderal habitat supports only locally common plants and animals capable of surviving in an urban environment, and that the project sites lack native habitat capable of supporting any locally known listed and/or sensitive species (Jericho Systems, 2015). Construction and operation activities would not create temporary or permanent impacts to sensitive or protected habitat or species. Impacts are anticipated to be **less than significant and no mitigation is required.**

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

4b. Response: (Source: City of San Bernardino General Plan- Figure NRC-2; City of San Bernardino General Plan Chapter 12; Jericho Systems, 2015; SunPower, 2015)

The proposed project sites are located on vacant land that is surrounded by urban development in the City of San Bernardino. According to the City's General Plan, neither site would be located within an identified Biological Resource Area, a Riparian Corridor, or a Percolation Basin. In a July 2015 habitat suitability assessment for the San Bernardino Kangaroo Rat and burrowing owl that was conducted at both sites, it was determined that no natural watercourses or wetlands supporting riparian vegetation and habitat are present (Jericho Systems, 2015). The eastern boundary of the Scheuer site is adjacent to Warm Creek channel, which is a concrete lined flood control channel and a tributary to the Santa Ana River Reach 5. This channel would not be disturbed by the project. As noted in the 2015 Hydrology Study, no jurisdictional drainage courses occur within the Scheuer or Garner sites (SunPower, 2015). As the project would not affect a protected species, it would not require an incidental take permit from the U.S. Fish and Wildlife Service. However, to ensure the project reduces impacts to natural habitat, MM BIO-1 and MM BIO-2 are recommended to ensure project activities do not pose a hazard to species resulting from project implementation and resulting alteration of existing site conditions. With the **implementation of MM BIO-1 and MM BIO-2**, **impacts would be reduced to less than significant**.

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

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4c. Response: (Source: City of San Bernardino General Plan- Figure NRC-2; City of San Bernardino General Plan Chapter 12; Jericho Systems, 2015; SunPower, 2015)

As described in Response 4b, the eastern boundary of the Scheuer site is adjacent to concrete lined Warm Creek channel, which would not be disturbed by the project. As noted in the 2015 Hydrology Study, no jurisdictional drainage courses occur within the Scheuer or Garner sites (SunPower, 2015). The project would not affect any protected wetlands and impacts are anticipated to be **less than significant and no mitigation is required**.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				\boxtimes
4d. Response: (Source: City of San Bernardino General Plan- Figur Plan Chapter 12; Jericho Systems, 2015; Google Earth)	res NRC-1 and	l NRC-2; City	of San Bernar	dino General
As described in Response 4a, a 2015 habitat suitability assessment contractive, ruderal habitat, which supports only locally common plants and (Jericho Systems, 2015). These sites lack native habitat capable of suppand no wildlife was observed during the site survey (Jericho Systems, of a native wildlife nursery site, and no migratory wildlife corridors anticipated.	d animals cap porting any loc 2015). The pro	able of survivi cally known lis oposed project	ing in an urban sted and/or sen is not located he project. No	n environment sitive species, in the vicinity
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				
Construction would begin with initial clearing, grubbing and select corner of the Scheuer project site boundary that could shade the sola permission for on-site tree removal will be obtained by the applicant of City of San Bernardino has established landscaping standards in its D of trees. According to Development Code Section 19.28.100, in the evel destroyed, or removed within a 36 month period, a permit shall first be than five trees are to be removed, impacts would be less than signific	r panels woul during clearin Development C ent that more t be issued by th	d be trimmed g and grubbing Code to address han five trees a ne City of San	or removed. A g phase of con s the removal are to be cut do Bernardino. C	Any necessary struction. The or destruction wn, uprooted,
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?				\boxtimes
4f. Response : (Source: City of San Bernardino General Plan- Figur Plan Chapter 12) According to the City of San Bernardino's General Plan, neither of adopted Habitat Conservation Plan, a Natural Community Conser- Biological Resource Management Area or habitat conservation pla	the proposed vation Plan, c	project sites or other appro	would be loca	ted within an tion plan. No
anticipated.				impacts are
5. CULTURAL RESOURCES. Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		

5a. Response: (Source: City of San Bernardino General Plan Chapter 11, Historical and Archaeological Resources and Appendix 13 – Historic Context; City of San Bernardino General Plan EIR Chapter 5.4 and Appendix C – Cultural Resources; South Central Coast Information Center (SCCIC) 2015; Google Earth Historic Maps and Soils and Geologic Layers, 2015; USGS Topographic Series Maps; and Bureau of Land Management General Land Office (GLO) maps)

The records search at the South Central Coast Information Center (SCCIC) of the California Historical Resources Information System (CHRIS) revealed that no historical resources are known to be present within the Scheuer or Garner project sites, and no previous cultural resource studies have been conducted on the project sites. Based on the City of San Bernardino General Plan EIR (GP EIR Figures 5.4-1 and 5.4-2), the project sites are not within an area of high sensitivity for historical resources. Historic maps, literature, aerial photography, local soils and geologic maps were also consulted. The project sites were not physically inspected.

A review of soils, geological, and recent Google Earth satellite imagery revealed the Scheuer and Garner project sites are situated on or near the remnants of Warm Creek's natural channel, and are positioned on an alluvial fan and floodplain landform. The annual or periodic flooding from Warm Creek could have potentially buried historical resources during flood events. Therefore, there is a moderate to high potential for buried undiscovered historical resources on the Scheuer and Garner project sites. With **implementation of MM CR-1**, **impacts would be reduced to less than significant**. The ultimate treatment of any resource would be developed individually after it has been discovered and in consultation with the appropriate resource specialists.

b. Cause a substantial adverse change in the significance of an	\boxtimes	
archeological resource pursuant to § 15064.5?		

5b. Response: (Source: City of San Bernardino General Plan Chapter 11, Historical and Archaeological Resources and Appendix 13 – Historic Context; City of San Bernardino General Plan EIR Chapter 5.4 and Appendix C – Cultural Resources; South Central Coast Information Center (SCCIC) 2015; Google Earth Historic Maps and Soils and Geologic Layers, 2015; USGS Topographic Series Maps; and Bureau of Land Management General Land Office (GLO) maps)

The SCCIC records search revealed that no archaeological resources (e.g., any unique archaeological resource or archaeological resource that is considered a historical resource) are known to be present within the Scheuer or Garner project sites, and no previous cultural resource studies have been conducted on the project sites. Based on the City of San Bernardino General Plan EIR (GP EIR Figures 5.4-1 and 5.4-2), the project sites are not within an area of high sensitivity for archaeological resources. Historic maps, literature, aerial photography, local soils and geologic maps were also consulted. The project sites were not physically inspected.

A review of soils, geological, and recent Google Earth satellite imagery revealed the Scheuer and Garner project sites are situated on or near the remnants of Warm Creek's natural channel, and are positioned on an alluvial fan and floodplain landform. The annual or periodic flooding from Warm Creek could have potentially buried archaeological resources during flood events. Therefore, there is a moderate to high potential for buried undiscovered archaeological resources on the Scheuer and Garner project sites. With **implementation of MM CR-1**, **impacts would be reduced to less than significant**. The ultimate treatment of any resource would be developed individually after it has been discovered and in consultation with the appropriate resource specialists.

c. Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Section 21074?		\boxtimes		
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ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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5c. Response: (Source: Consultation with Tribal Representatives; Google Earth Soils and Geologic Layers, 2015)

AB 52 establishes a formal role for California Native American tribes in the CEQA process. CEQA lead agencies are required to consult with tribes about potential tribal cultural resources in the project area, the potential significance of project impacts, the development of project alternatives and the type of environmental document that should be prepared. AB 52 directs tribes to contact all CEQA lead agencies to formally request to be notified of projects in regions the tribe is traditionally affiliated. The seven tribes that requested notification from Riverside were notified of the project by the City on August 18, 2015 by letter. Three tribes expressed interest in the project however, only two requested consultation meetings (September 10 and 14, 2015) where the results of a record search and a buried site sensitivity analysis were discussed. The Gabrieleno Band of Mission Indians – Kizh Nation (Gabrieleno) provided language for a recommended mitigation measure (September 21, 2015), but did not respond to requests for an in-person consultation meeting to discuss the proposed measure prior to the publication of the Draft MND.

Based on tribal consultation for the current Scheuer and Garner project sites, no known tribal cultural resources have been identified within the project sites. However, potential tribal cultural resources may have been buried under sediment from annual or periodic flooding associated with Warm Creek. Therefore, there is a moderate to high potential for buried undiscovered tribal cultural resources on the Scheuer and Garner project sites. Mitigation measures were crafted based on tribal requests during consultation meetings and submitted for their review and approval. <u>An additional mitigation measure</u> (<u>MM CR-5</u>) was developed in response to an additional letter from the Gabrieleno received during the comment period. With **implementation of MM CR-1 through MM CR-45**, **impacts would be reduced to less than significant**. The ultimate treatment of any resource would be developed individually after it has been discovered and in consultation with the appropriate resource specialists.

d.	Disturb any human remains, including those interred outside	\boxtimes	
	of formal cemeteries?		

5d. Response: (Source: City of San Bernardino General Plan EIR, Chapter 5.4-3; SCCIC, 2015; Google Earth Historic Map Layer; USGS Topographic Series Maps; and Bureau of Land Management General Land Office (GLO) maps)

There is no indication that human remains are present within the boundaries of the project sites. Background archival research failed to find any potential for human remains (e.g., formal cemeteries); however, the project sites were not physically inspected. The limited nature of the planned ground disturbance makes it unlikely that human remains would be unearthed during project ground disturbance. In the unlikely event that ground disturbing activities at the project sites inadvertently discover buried or surficial human remains, **implementation of MM CR-2 through MM CR-4 would reduce impacts to less than significant.** The ultimate treatment of any resource would be developed individually after it has been discovered and in consultation with the appropriate resource specialists.

6.	GEOLOGY AND SOILS. Would the project:		
	a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:		
	 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. 		

INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
6ai. Response: (Source: City of San Bernardino General Plan EL Alquist-Priolo Earthquake Fault Zones)	R Figure 5.5-4	– Regional Fa	ult Map and F	Figure 5.5-5
There are no known or identified active or potentially active fault. Alquist-Priolo Earthquake Fault Zone is located over 5 miles to proposed project would expose people or structures to the risk of loss fault. No impacts are anticipated .	he southwest.	Neither constr	uction nor ope	eration of th
ii. Strong seismic ground shaking?			\boxtimes	
6aii. Response: (Source: City of San Bernardino General Plan 5 – Alquist-Priolo Earthquake Fault Zones)	EIR Figure 5.5	-4 – Regional	Fault Map and	l Figure 5.5-
A large earthquake along one of the nearby fault systems would reproject site. The proposed project does not include the construct operational phase, the proposed project would be operated on an un personnel visits for security, maintenance, and system monitoring. hours of operation. The proposed project components would be eng shaking. The risk of loss, injury, or death involving strong ground impact is anticipated to be less than significant and no mitigation .	tion of any ho staffed basis an No personnel w ineered and bui shaking at the p is required .	using or habit d monitored re yould be on-sit It to withstand	able structures motely, with r e during the n the effects of s ct site would b	s. During th egular on-sit najority of th strong groun
iii. Seismic-related ground failure, including liquefaction			\square	
The second second second states and	iquefaction sus	centibility Ho		
	, no personnel v area designated h PV site so the	would be on-si d with high lic findings can b	te during the n uefaction susc be incorporated	hajority of th eptibility, th l into the fina
include any housing or habitable structures. Following construction hours of operation. Because the project would be located within an project applicant has already conducted geotechnical studies for eac project design, as needed. This impact is anticipated to be less than iv. Landslides?	, no personnel v area designated h PV site so the	would be on-si d with high lic findings can b	te during the n uefaction susc be incorporated	hajority of th eptibility, th l into the fina
 include any housing or habitable structures. Following construction hours of operation. Because the project would be located within an project applicant has already conducted geotechnical studies for eac project design, as needed. This impact is anticipated to be less than iv. Landslides? 6aiv. Response: The proposed project would be located on a flat site with no notable are anticipated. 	, no personnel v area designated h PV site so the significant and	would be on-si d with high liq findings can b d no mitigatio	te during the n juefaction susc be incorporated n is required . he project area	najority of th eptibility, th l into the fina
 include any housing or habitable structures. Following construction hours of operation. Because the project would be located within an project applicant has already conducted geotechnical studies for eac project design, as needed. This impact is anticipated to be less than iv. Landslides? 6aiv. Response: 	, no personnel v area designated h PV site so the significant and	would be on-si d with high liq findings can b d no mitigatio	te during the n uefaction susc be incorporated n is required .	najority of the eptibility, the linto the fination of the fina

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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6c. Response: (Source: City of San Bernardino General Plan EIR Figure 5.5-3 – Potential Subsidence Areas and Figure 5.5-6 – Liquefaction Susceptibility)

The project sites are located within an area designated with high liquefaction susceptibility. Furthermore, the project sites are located within an area of potential ground subsidence. Because the project would be located within an area designated with potential ground subsidence, the project applicant has already conducted geotechnical studies for each PV site so the findings can be incorporated into the final project design, as needed. This impact is anticipated to be **less than significant and no mitigation is required**

d.	Be located on expansive soil, as defined in Table 18-1-B of		$\overline{\times}$	
	the Uniform Building Code (1994), creating substantial risks			
	to life or property?			

6d. Response: (Source: City of San Bernardino General Plan EIR Figure 5.5-3 – Potential Subsidence Areas and Figure 5.5-6 – Liquefaction Susceptibility)

Because the project sites are located within an area designated with high liquefaction susceptibility and within an area of potential ground subsidence, the potential for unidentified expansive soil exists. Because the project would be located within an area designated with potential expansive soil, the project applicant has already conducted geotechnical studies for each PV site so the findings can be incorporated into the final project design, as needed. This impact is anticipated to be **less than significant and no mitigation is required**

e.	Have soils incapable of adequately supporting the use of		\boxtimes
	septic tanks or alternative waste water disposal systems		
	where sewers are not available for the disposal of waste		
	water?		

6e. Response:

The proposed project would not include the use of septic tanks or alternative wastewater disposal systems. No wastewater facilities would be constructed as part of the proposed project. If sanitation facilities are required during the construction period, temporary portable toilets would be provided for the workers. **No impacts are anticipated**.

f.	Directly or indirectly destroy a unique paleontological		\bowtie
	resource or site or unique geologic feature?		

6f. Response: (Source: City of San Bernardino General Plan EIR, Chapter 5.4-8; Initial Study and Mitigated Negative Declaration Import of Fill Material to Warm Creek Conservation Basins 94-Acre Project Site: City of San Bernardino and City of Colton, San Bernardino County, Chapter 5 and Appendix C, 2012; Google Earth Soils and Geologic Layers 2015, Geologic Map of California, San Bernardino Sheet, Rogers 1967; Geologic Map of the San Bernardino Quadrangle, Bortungno and Spittler, 1986)

A review of local geological maps and soils of the area indicates the project sites are situated on an alluvial fan, floodplain landform and are positioned on Holocene-age alluvium (Qal) and wash (Qw) deposits created by erosion of Warm Creek and other drainages within San Bernardino County. This area had been subject to massive flooding over the last 150-years, and for this reason the alluvial wash sediments are considered too young to contain significant paleontological deposits. It is considered highly unlikely that significant paleontological resources shall be encountered during project-related ground disturbance. No impacts are anticipated.

7. GREENHOUSE GAS EMISSIONS.			
Would the project:			
a. Generate greenhouse gas emissions, either directly indirectly, that may have a significant impact on t environment?		\boxtimes	

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With	Less Than Significant Impact	No Impact
		Mitigation		
		Incorporated		

7a. Response:

The direct and indirect emissions from the proposed project were calculated and those calculations and the assumptions used in those calculations are provided in Attachment B. It is assumed that construction of both facilities would occur simultaneously or overlap. Therefore, construction emissions were calculated for both projects together to present a worstcase scenario. A summary of the Greenhouse Gas (GHG) emissions calculations from project construction is provided below.

CalEEMod MODEL RESULTS CONSTRUCTION SCHEUER AND GARNER					
Emission Source Emissions (Metric Tons CO2e/Year)					
Construction Total	250.65				
Annualized Over Project Lifetime	8.35				

Additionally, operational emissions were calculated for each project. A summary of the GHG emissions calculations from project operation is provided below.

CalEEMod MODEL RESULTS OPERATION							
Scheuer Garner							
Operational Annual GHG Emissions (Tons)	Emissions (CO2e)	Emissions (CO2e)					
Operational (Mobile) Sources	6.64	4.38					
Indirect CO2 Uptake Loss	3.13	0.87					
Indirect Water Use	0.22	0.06					
Direct Increases	9.99	5.31					
Conventional Electricity Generation Offset	-3,522	-755					
Increases Summary	-3,512.01	-749.69					

The SCAQMD has established a GHG significance threshold of 10,000 tons per year, with project construction emissions to be amortized over the project life. As presented above, the proposed project's annual indirect GHG emissions from the displacement of fossil fuel fired electricity generation is orders of magnitude greater than the proposed project's annualized direct and indirect emissions sources (including when construction GHG emissions shown above are included). Therefore, the overall effect of the proposed project is to reduce GHG emissions. The project's GHG emissions during construction would be nominal and well below the SCAQMD significance threshold, with GHG emissions being offset by construction of renewable energy facilities. Impacts would be **less than significant and no mitigation is required.**

b.	agency adopted for the	icable plan, policy or regulation of an purpose of reducing the emissions of		\square	
	greenhouse gases?				

7b. Response: (Source: Governor's Office of Planning and Research - Technical Advisory, CEQA and Climate Change: Addressing Climate Change Through CEQ) Review; California Air Pollution Control Officers Association - Model Policies for Greenhouse Gases in General Plans)

There are no federal, State, or local climate change or GHG emissions regulations that directly affect the proposed project's construction. The project is proposing SF6 containing equipment, which would be subject to the California Air Resources Board (CARB) Regulation for Reducing Sulfur Hexafluoride Emissions from Gas Insulating Gear (17 CCR 95350). Additionally, there are a number of federal, State, and local plans and policies, and GHG emissions reduction strategies that are potentially applicable to the proposed project, either directly or indirectly. A summary of the compliance with all potentially applicable GHG plans, policies, and regulations is provided below.

Adopted Plan, Policy, or Regulation	Consistency Determination	Proposed Project Consistency
Federal		
40 CFR Part 98. Mandatory Reporting of Greenhouse Gases Rule.	Not Applicable	The proposed project would not have emissions sources that would be subject to this regulation.
40 CFR Part 52. Proposed Prevention of Significant Deterioration and Title V Greenhouse Gas Tailoring Rule.	Not Applicable	The proposed project would not have emissions sources that would be subject to this regulation.
State		
AB 32. Regulation for Reducing Sulfur Hexafluoride Emissions from Gas Insulating Gear (17 CCR 95350)	Consistent	The proposed project's new SF6 containing equipment would be subject to this regulation and the project owner would be required to comply with the requirements of this regulation.
AB 32. Annual GHG Emissions Reporting	Not Applicable	The proposed project does not include emissions sources that would be subject to this regulation.
AB 32. Cap-and-Trade	Not Applicable	The proposed project does not include emissions sources that would be subject to this regulation.
California Renewable Portfolio Standard Program	Consistent	The proposed project, as dispatched to serve a publicly owned utility, would contribute towards RPS program requirements.

The table below summarizes current California emission reduction strategies to reduce GHGs, identifies the applicability of each strategy, and the proposed project design feature or mitigation measure that is proposed to comply with the applicable strategies.

Strategy	Project Design/Mitigation to Comply with Strategy
Vehicle Climate Change Standards: AB 1493 (Pavley) required the State to	These are CARB enforced
develop and adopt regulations that achieve the maximum feasible and cost-	standards; vehicles that
effective reduction of climate change emissions emitted by passenger vehicles and	access the project site
light duty trucks. Regulations were adopted by CARB in September 2004.	during construction and
Other Light Duty Vehicle Technology: New standards would be adopted to phase	operation are required to
in beginning in the 2017 model.	comply with the standards
Heavy-Duty Vehicle Emission Reduction Measures: Increased efficiency in the	addressed under these
design of heavy-duty vehicles and an education program for the heavy-duty vehicle	strategies.
sector.	

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Signi W Mitiş	Than ificant 7ith gation porated	Less Than Significant Impact	No Impa	
 Diesel Anti-Idling: In July 2004, CARB adopted a measure to commercial motor vehicle idling. Achieve 50 percent (50%) Statewide Recycling Goal: Achiev percent (50%) waste diversion mandate as established by the Management Act of 1989 (AB 939, Sher, Chapter 1095, Sta reduce climate change emissions associated with energy extraction and production as well as methane emission from la rate of 48 percent (48%) has been achieved on a Statewide ba percent (2%) additional reduction is needed. Zero Waste - High Recycling: Additional recycling beyond the 	ving the State e Integrated V tutes of 1989 intensive ma ndfills. A dive asis. Therefore	veled 's 50 Waste) will tterial ersion e, a 2	The would strateg throug use of during	proposed comply with gies by compose th other ber of vegetative construction ion, as feasible	sting or neficial waste n and	
 (50%) recycling goal. Building Energy Efficiency Standards in Place and in Progress Code 25402 authorizes the California Energy Commissi periodically update its building energy efficiency standards (t constructed buildings and additions to and alterations to existin Green Buildings Initiative: Green Building Executive Order, S sets a goal of reducing energy use in public and private build (20%) by the year 2015, as compared with 2003 levels. 	Public Reso on to adopt hat apply to r g buildings).	urces and newly 005),	buildi	pplicable as n ngs are propos pplicable		-

In summary, the proposed project would conform to State and local GHG emissions/climate change regulations and policies/strategies and have **less than significant impacts with no mitigation required**.

8.		AZARDS & HAZARDOUS MATERIALS.		
	a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?		

8a. Response:

Construction of the proposed project would include the use and transport of hazardous materials in the form of fuels and lubricants required to operate construction vehicles and equipment. Such use is not unusual and would occur in compliance with BMPs to avoid accidental leaks or spills.

Hazardous or flammable materials used during construction would consist primarily of small volumes of petroleum hydrocarbons and their derivatives (e.g., fuels, oils, lubricants, and solvents) required for the operation of construction equipment. These materials would be those routinely associated with the operation and maintenance of heavy construction equipment or other support vehicles, such as gasoline, diesel fuels, and hydraulic fluids. In addition to these hazardous materials, it is anticipated that small quantities of additional common hazardous materials would be used on-site during construction, including antifreeze and used coolant, latex and oil-based paint, paint thinners and other solvents, cleaning products, and herbicides. MM HAZ-1 would ensure proper storage, transport, and disposal of hazardous wastes utilized onsite. **Implementation of MM HAZ-1 would reduce impacts to less than significant levels.**

b. Create a significant hazard to the	public or the environment	\square	
through reasonably foreseeab	1		
conditions involving the release	f hazardous materials into		
the environment?			

8b. Response:

As described above in Response 8a, solar facility construction, operation, and decommissioning would require the limited use of hazardous materials that could result in potential adverse health and environmental impacts if these materials were used, stored, or disposed of improperly, causing accidents, spills, or leaks. **Implementation of MM HAZ-1 would reduce impacts to less than significant levels.**

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				
8c. Response:		1		
The Garner site is located directly adjacent to Monterey Elementary S construction, operation, and decommissioning would require the limite that could result in potential adverse health and environmental impa improperly, causing accidents, spills, or leaks. Implementation of significant levels.	d use of hazar cts if these m	dous materials	s, such as fuel a used, stored, c	nd lubricants, or disposed of to less than
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?				\square
8d. Response: (Source: California Department of Toxic Substances	Control – Cor	rtese List)		
Neither the Scheuer nor Garner sites are located on an identified hazard 65962.5, and therefore, would not create a significant hazard to the pu				
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				
8e. Response: (Source: City of San Bernardino General Plan Figure Boundaries)	LU-4 – San H	Bernardino Int	ernational Air	port Planning
The proposed project sites are located approximately 2.2 miles nort designated within the "Airport Influence Area" by the General Plan. of any housing or habitable structures. During the operational phase, basis and monitored remotely, with regular on-site personnel visits personnel would be on-site during the majority of the hours of opera hazard for people residing or working in the project area. This impact required.	The proposed the proposed for security, tion. Therefore	l project does project would maintenance, re, the project	not include the be operated or and system m would not res	e construction n an unstaffed onitoring. No ult in a safety
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				\boxtimes
8f. Response:				
There are no private airstrips located within five miles from the propo in a safety hazard for people residing or working in the project area.				fore not result
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				
8.g Response:				
Construction, operation, and decommissioning of each PV projec closures/disruptions that could affect traffic flow, emergency response				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				

Sh. Response: (Source: CAL FIRE - San Bernardino County Fire Hazard Severity Zone Map)

Wildland fires are not expected due to minimal vegetation in the project sites and surrounding area. The project sites are not located on forest or wilderness land, and the project would not involve the construction or operation of habitable structures in wildland areas or promote development in wildland areas. Furthermore, the CAL FIRE San Bernardino County Fire Hazard Severity Zone Map does not identify either project site as being located within 5 miles of any lands designated as very high or high fire hazard zones. Therefore, the proposed project would not introduce any impacts associated with wildland fires. No impacts are anticipated.

9.	HYDROLOGY AND WATER QUALITY. Would the project:		
	a. Violate any water quality standards or waste discharge requirements?	\square	

9a. Response: (Source: State Water Resources Control Board website- Construction Storm Water Program)

Construction, operation, and decommissioning of the proposed project could violate water quality standards or waste discharge requirements due to accelerated erosion and sedimentation and the accidental release or spill of hazardous materials. Construction of the project would require site preparation, including clearing, grubbing and selected grading, as well as erection of the PV modules, supports, and associated electrical equipment. These activities could loosen the soil and lead to accelerated erosion and sedimentation during a storm event. However, the potential for construction of the project to result in increased erosion and sedimentation is very small due to the small amount of soil disturbance and the flat topography of the project sites.

Construction activities would include the use of heavy machinery and equipment. The use of this construction equipment could result in the accidental release or spill of hazardous materials, including hydraulic oil, fuel, grease, lubricants, coolant, and other petroleum-based products. If leaked or spilled, these hazardous materials could contaminate a nearby waterbody either directly or indirectly through subsequent transport by stormwater runoff. The potential for the project to result in contamination of a nearby waterbody by hazardous materials is unlikely due to the short construction period, the minimal amount of construction equipment and associated hazardous materials to be used in construction of the project, and the flat topography of the region.

The maximum disturbance area during site clearing and grubbing at any one time is five acres per site. As this acreage exceeds the State Water Resources Control Board's one acre disturbance threshold for permitting, the applicant would be required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ). Compliance with these requirements would include preparation of a SWPPP, which would specify BMPs to minimize erosion and to quickly contain and clean up any accidental spills or leaks.

To avoid conflicts with waste discharge requirements, MM WQ-1 would ensure that the applicant prepares a SWPPP that identifies construction and post construction related stormwater BMPs, and MM HAZ-1 would establish emergency response measures for hazardous spills that would reduce the potential for water quality contamination. With **implementation of MM WQ-1 and MM HAZ-1**, **impacts would be reduced to less than significant**.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				

9b. Response: (Source: City of San Bernardino General Plan Chapter 13; SBV Water Conservation District- Engineering Investigation of the Bunker Hill Basin 2013-2014)

The City of San Bernardino's entire source of water is from Bunker Hill Basin, which is an underground aquifer. According to the San Bernardino Valley Water Conservation District's 2014 Engineering Investigation, the amount of water to be withdrawn from Bunker Hill Basin during the July 2014 to June 2015 water year was estimated to be 106,173 acre-feet (includes both agriculture and non-agriculture uses).

During construction of the proposed project, water may be required for dust suppression. Construction water use would be short-term (12 to 16 weeks), and is assumed to not exceed 10 acre-feet. During project operation, the solar panels would be periodically washed, with less than one pint of water needed to clean each panel resulting in an annual water usage of 0.004 acre-feet per year. Water requirements for project construction and operation would be a negligible percentage of the total amount of water that is extracted annually from Bunker Hill Basin. In addition, very few impermeable surfaces would be created during construction of the proposed project (limited to foundations for PV modules, inverters, and transformers), and neither construction nor operation of the project would interfere substantially with groundwater recharge. Impacts would be **less than significant with no mitigation required**.

c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a	\boxtimes	
	stream or river, in a manner which would result in substantial		
	erosion or siltation on- or off-site?		

9c. Response: (Source: State Water Resources Control Board website- Construction Storm Water Program; SunPower, 2015)

Construction of the proposed project would involve minor alterations to the existing on-site drainage pattern as a result of some required earthwork such as grading, fill, compaction, and erosion control implementation. As noted in a 2015 Hydrology Study regarding the on-site drainage course on the western boundary of the Scheuer site, field inspections show that there are no storm drain culverts, boxes or other storm drain facilities that allow flows to continue through said street right-of-ways. It appears the channel was a natural storm channel that no longer carries significant storm flows after the construction of the flood control channel. These channel segments essentially function as a series of retention basins for limited drainage areas. There are no affected on-site drainages within the Garner site. As part of the project's Construction General Permit (see Response 9a), and as recommended in MM WQ-1, the applicant would prepare a SWPPP that would specify BMPs to minimize erosion and/or siltation during construction. With **implementation of MM WQ-1**, **impacts would be reduced to less than significant**.

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

ISSUES (AND SUPPORTING	Potentially Significant	Less Than Significant	Less Than Significant	No Impact
INFORMATION SOURCES):	Impact	With Mitigation Incorporated	Impact	Impact
9d. Response: (Source: State Water Resources Control Board we 2015)	bsite- Constru	-	Vater Program	n; SunPower,
As described in Response 9c, the proposed alterations to the existing minor. In compliance with the project's Construction General Permit, prepare a SWPPP that would specify BMPs to minimize erosion and of MM WQ-1, impacts would be reduced to less than significant.	and as recomm	nended in MM	WQ-1, the ap	plicant would
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?				\square
9e. Response: As described in Response 9b, minimal water use would be require construction nor operation of the project would substantially increas Existing or planned stormwater drainage systems would not be aff	se the rate or	amount of ru	noff from the	existing site.
impacts are anticipated.		-		FJ
f. Otherwise substantially degrade water quality?				
As described in Response 9a, the use of construction equipment commaterials, including hydraulic oil, fuel, grease, lubricants, coolant, a these hazardous materials could contaminate a nearby waterbody eith stormwater runoff. While the potential for the project to result in cont 1 is recommended to minimize impacts to the extent feasible by esspills. With implementation of MM HAZ-1 , impacts would be red	nd other petro er directly or i amination of a tablishing emo	leum-based pr indirectly throu nearby waterl ergency respon	oducts. If leak ugh subsequer body is unlikel use measures	ked or spilled, it transport by ly, MM HAZ-
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				\boxtimes
9g. Response:				
The proposed project does not include any housing or habitable struc	tures. No imp	acts are antici	pated.	
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?		\square		
9h. Response: (Source: City of San Bernardino General Plan Chapt 1)	er 10; City of	San Bernardir	ao General Pla	ın- Figure S-
The proposed solar arrays at the two sites would be adjacent to a 100 channel. However, the current site plans for the Scheuer and Garner would be outside of this flood plain. In order to ensure that the project MM WQ-2 is recommended. With implementation of MM WQ-2 , i	facilities indict would not p	cate that cons lace structures	truction of the within a floo	e PV modules d hazard area,
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		

9i. Response: (Source: City of San Bernardino General Plan Chapter 10; City of San Bernardino General Plan- Figure S-2)

The proposed project would not alter or encroach on any dam or levee, and would not substantially alter the flood patterns in the area. According to the City of San Bernardino General Plan, the two project sites are within an inundation area for Seven Oaks Dam. However, as noted in the City's General Plan (Chapter 10, Figure S-2), the likelihood of inundation for the mapped area (including the project sites) is extremely remote. As the proposed project would not construct habitable structures, the project is not expected to increase the risk of loss, injury, or death involving flooding. **No impacts are anticipated.**

j. Inundation by seiche, tsunami, or mudflow?	\boxtimes	

9j. Response: (Source: State Water Resources Control Board website- Construction Storm Water Program; Google Earth)

The proposed project is not located near to an ocean or enclosed waterbody, and would not cause or be subject to inundation by tsunami or seiche. As discussed in Response 9e, the project would not alter the rate or amount of runoff in the area. As discussed in Response 9a, the applicant would prepare a SWPPP that would specify BMPs to minimize erosion and/or siltation during construction through the implementation of MM WQ-1. The project would not cause inundation by mudflow. With **implementation of MM WQ-1**, **impacts would be reduced to less than significant**.

10. LAND USE AND PLANNING:		
Would the project:		
a. Physically divide an established community?		\square

10a.Response:

A community may be divided if a project were to introduce a physical barrier through that community. Such a project is generally linear, such as a highway or railroad. The proposed project involves the construction of two solar PV electrical generating facilities on two properties owned by RPU in the City of San Bernardino. The two sites are vacant parcels surrounded by industrial and residential land uses, as well as schools and local parks. The project's construction (i.e., site preparation, PV installation, and restoration) and operational activities would occur entirely onsite, with offsite activity limited to the transportation of construction equipment and personnel. Construction and operation of the project would not introduce a barrier that would divide the surrounding community. **No impacts are anticipated.**

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

10b. Response: (Source: City of San Bernardino Zoning and GPLU Map; City of San Bernardino Development Code Chapter 19.04- Table 04.01)

The project sites are currently owned by RPU, and are located within the jurisdictional boundary of the City of San Bernardino. According to the City's zoning map, the Scheuer site is zoned as RS (Residential Suburban) and the Garner site is zoned as RM (Residential Medium). In the City's Development Code (Section 19.04.020), the City has identified a list of uses in residential zones that are Permitted; are subject to an Administrative Permit, Development Permit, or Conditional Use Permit; or are Prohibited. According to Table 04.04 in the City's Development Code, private or public utility facilities may be located in RS and RM zones, but would be subject to a Development Permit from the City. Thus, the project would not conflict with any applicable land use plan, policy or regulation. **No Impacts are anticipated.**

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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10c.Response: (Source: City of San Bernardino General Plan- Figures NRC-1 and NRC-2; City of San Bernardino General Plan Chapter 12)

As discussed in Response 4f, the City of San Bernardino's General Plan did not identify any habitat conservation plan or natural community conservation plan in the vicinity of the proposed project sites. No habitat conservation plan would be affected by the project. **No impacts are anticipated.**

11. MINERAL RESOURCES.			
Would the project:			
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?		\boxtimes	

11a. Response: (Source: City of San Bernardino General Plan- Figure NRC-3; City of San Bernardino General Plan Chapter 12; City of San Bernardino Development Code Chapter 19.08; City of San Bernardino Zoning and GPLU Map)

The California Geological Survey administers a mineral lands inventory and classification process across the State. Surveyed areas are categorized into mineral resource zones (MRZ) on the basis of geologic factors (e.g., presence of mineral deposits). The project sites are located in an identified MRZ-2, which is defined as areas where the available geologic information indicates that there are significant mineral deposits or that there is a likelihood of significant mineral deposits.

The City of San Bernardino has established policies in its General Plan to address the management of mineral resources. However, these policies are specific to non-mineral extractive uses in areas zoned as Industrial Extractive (IE). The proposed project sites are zoned Residential Suburban (RS) and Residential Medium (RM), and therefore the project would not conflict with the City's mineral resource policies.

Although the proposed project would prevent the extraction of mineral resources at the project sites during its lifetime, these mineral resources would be accessible following project decommissioning. Given that a preclusion of access to mineral resources would not be permanent, and given that the project sites are not zoned for mineral extraction, impacts would be **less than significant with no mitigation required.**

b.	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general		\boxtimes
	plan, specific plan or other land use plan?		

11b. Response: (Source: City of San Bernardino General Plan- Figure NRC-3; City of San Bernardino General Plan Chapter 12; City of San Bernardino Development Code Chapter 19.08; City of San Bernardino Zoning and GPLU Map)

As discussed in Response 11a, the project would be located in a MRZ-2 as identified by the California Geological Survey. No additional mineral resource recovery sites at or adjacent to the proposed project have been identified in City of San Bernardino land use plans, and the project sites are not zoned for mineral extraction. **No impacts are anticipated.**

12. NOISE. Would the	e project result in:			
excess	sure of persons to or generation of noise levels in s of standards established in the local general plan or ordinance, or applicable standards of other agencies?		\boxtimes	

ISSUES (AND SUPPORTING	Potentially Significant	Less Than Significant	Less Than Significant	No Impact
INFORMATION SOURCES):	Impact	With Mitigation	Impact	Impuer
		Incorporated		

12a. Response: (Source: City of San Bernardino Municipal Code Chapter 8.54 – Noise Control; General Plan Chapter 14 - Noise)

City of San Bernardino Municipal Code Section 8.54.070 states that noise from construction activities shall not occur outside the hours of 7:00 a.m. and 8:00 p.m. As described in Section 8 (Description of Project) within this document, construction of the project would not occur outside of these allowable hours. The City of San Bernardino Noise Ordinance and General Plan do not establish noise standards that apply to construction activities. Therefore, project construction is compliant with the noise ordinance and General Plan.

The City of San Bernardino Noise Ordinance and General Plan do not establish noise standards that apply to operation of the proposed solar PV facilities. Impacts would be **less than significant with no mitigation required**.

b.	Exposure of persons to or generation of excessive		\bowtie	
	groundborne vibration or groundborne noise levels?			

12b. Response: (Source: Federal Highway Administration – Construction Noise Handbook)

Heavy equipment use (primarily during any site grading activities and erection of solar module foundations) and loaded heavy trucks have the potential to generate localized groundborne vibration. However, temporary vibration is not anticipated to extend beyond 150-feet of the source. Based on the site plans shown in Figures 2 and 3, vibration is not expected outside the project site boundary that could result in any vibration deemed excessive. Once constructed, typical maintenance activities would not utilize heavy equipment that could generate localized vibration. Impacts would be **less than significant with no mitigation required**.

c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			\boxtimes	
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12c. Response:

Based on a review of noise assessments prepared for solar PV projects in California, a typical power inverter generates 66 dBA Leq (i.e., time weighted average of the level of sound in decibels on scale A which is relatable to human hearing) measured at a distance of 50 feet without an enclosure. Tracking motors that tilt an array of panels typically generate 38 dBA Leq at 50 feet. Maintenance, panel washing, and cleaning of installations would be expected to generate peak noise levels of approximately 70 dBA Leq at 50 feet. Such noise would attenuate approximately 5 dB per doubling of distance. Additionally, inverters and other on-site switchgear sources would likely be enclosed, significantly reducing the spread of noise. Given the distance to the nearest sensitive receptors from interior portions of each project site where such equipment would be situated, any noise would attenuate to below ambient conditions and would not be perceptible. Furthermore, noise generated from periodic maintenance activities would be short term and limited in duration. This impact would be **less than significant and no mitigation is required.**

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

\boxtimes	

12d. Response: City of San Bernardino Municipal Code, City of San Bernardino General Plan

The primary source of temporary or periodic noise associated with the proposed project is from construction activity and maintenance work. Construction noise typically involves the loudest common urban noise events associated with demolition, grading, construction, large diesel engines, truck deliveries and hauling.

The nearest sensitive receptors, residences to the northeast is about 500 feet from the proposed PV system. This distance is sufficient to attenuate any minor noise generation resulting from the solar panel and construction activities. Installation of the new aboveground and below ground electrical facilities will result in a temporary or periodic increase in the vicinity in which these facilities are being installed. This noise will not be situated in a single location for an extended period of time as construction proceeds. Because of existing noise regulations that construction contractors will be required to follow and the limited types of construction to be employed for the Project, potential impacts related to substantial temporary or periodic increases in ambient noise levels **will be less than significant**.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact		
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				\boxtimes		
12e. Response:						
The proposed project sites are located approximately 2.2 miles northwest of San Bernardino International Airport. The project does not include the construction of any housing or habitable structures. During the operational phase, the proposed project would be operated on an unstaffed basis and monitored remotely, with regular on-site personnel visits for security maintenance, and system monitoring. No personnel would be on-site during the majority of the hours of operation. Due to the distance of the proposed project sites to this aviation facility, neither construction nor operation of the project would subject workers to excessive aviation-generated noise levels. No impacts are anticipated.						
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				\bowtie		
12f. Response:						
There are no private airstrips located within five miles from the pro operation of the project would subject workers to excessive aviation-						
13. POPULATION AND HOUSING. Would the project:						
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				\boxtimes		
13a. Response:						
The proposed project would employ a maximum of 20 construction employees at each site throughout the three and a half- month construction period. The on-site workforce would consist of laborers, various skilled trades, supervisory personnel, support personnel, and construction management personnel. The construction workforce would likely be a mix of workers from within and around the Inland Empire. Once operational, no personnel would be on-site during the majority of operation as maintenance requirements would be limited. Therefore, due to the temporary nature of the construction period, and no full- time employees during the operation period, the proposed project would not directly induce any population growth within the area. No impacts are anticipated.						
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				\boxtimes		
13b. Response:						
The proposed project sites are mostly vacant land owned by RPU. There are several unmanned structures located along the northerly boundary of the Garner site. On the Scheuer site, there is a single unmanned structure located at the northeast end of the site; otherwise both sites are vacant. The unmanned structures house water production wells.						
There are no residential structures within the project sites and the prop of housing, nor would the project require the removal of any existing						
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				\boxtimes		

ISSUES (AND SUPPORTING INFORMATION SOURCES):

Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
	Incorporated		

13c. Response:

The proposed project sites do not contain residences located within the boundaries of the project sites. Therefore, the proposed project would not result in the temporary displacement of people. No impacts are anticipated to occur.

14. PUBLIC SERVICES.				
Would the project result in substantial adverse physical impacts				
associated with the provision of new or physically altered				
governmental facilities, need for new or physically altered				
governmental facilities, the construction of which could cause				
significant environmental impacts, in order to maintain				
acceptable service ratios, response times or other performance				
objectives for any of the public services:				
a. Fire protection?			\square	
14a. Response:				
Construction, operation, and decommissioning activities associated w	ith the proper	nd project wow	ld not signific	onthy increase
the demand for fire protection services. Construction would be complete				
require a maximum of 20 construction employees at each site. The con				
project area, so the project would not increase the need for fire prote				
would be operated on an unstaffed basis. Therefore, no full-time staff				
increase in the demand for fire protection services from a permanent				
1 1	1 1	-	1 5	
The proposed PV modules and ancillary equipment represent a negl	igible fire risk	Decommissi	ioning of the s	solar facilities
would be similar to construction in that the short duration of activities				
area, and would not increase the demand for fire protection services.				
significant with no mitigation required.		F		
b. Police protection?				\square
14b. Response:				
Identical to the discussion provided in Response 14a, the proposed	oroject would	not result in a	ny population	increase that
could increase the demand for police services. A security fence wou				
security gate to deter unauthorized access. These project design feature				
Decommissioning activities would be similar to construction in th				
population in the project area, and would not increase the demand for				
c. Schools?				
14c. Response:			·	
Identical to the discussion provided in Response 14a, the proposed	project would	not result in a	ny population	increase that
could increase the demand for school services. No impacts are antic	ipated.			
d. Parks?				\square
14d. Response:			L	I
Identical to the discussion provided in Response 14a, the proposed	project would	not result in a	my population	increase that
could increase the demand for park facilities. No impacts are anticip	ated to occur	•		
e. Other public facilities?				\square

ISSUES (AND SUPPORTING INFORMATION SOURCES):

Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
	Incorporated		

14e. Response:

Identical to the discussion provided in Response 14a, the proposed project would not result in any population increase that could increase the demand for police services, such as libraries. **No impacts are anticipated.**

15. RECRE	ATION.		
and re substa	I the project increase the use of existing neighborhood egional parks or other recreational facilities such that ntial physical deterioration of the facility would occur accelerated?		\square
15a. Response	٥.		

Construction, operation, and decommissioning activities associated with the proposed project would not increase the demand for parks or recreational facilities. Project construction would be completed in approximately 12 to 16 weeks. Given this short time-frame, it is unlikely that a construction workforce would relocate to the project area and increase the use of local recreational resources. The project would be operated on an unstaffed basis, and therefore operational activities would not increase the demand for parks or recreational facilities. Decommissioning activities would be similar to construction in that their short duration would not likely result in the relocation of workers' families to the project area. **No impacts are anticipated.**

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

15b. Response:

The proposed project is a solar power facility that would include the construction of PV modules and ancillary equipment, and would not include the construction or expansion of recreational facilities. As discussed in Response 15a, the project would not increase the demand for parks or recreational facilities. **No impacts are anticipated.**

16. TRANSPORTATION/TRAFFIC. Would the project result in:		
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit		

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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16a. Response: (Source: City of San Bernardino General Plan Chapter 6 – Circulation; Caltrans – Guide for the Preparation of Traffic Impact Studies; Caltrans – Traffic Volumes on California State Highway System)

When operational, the project would be unmanned and only require vehicle trips as needed for maintenance. The number of operational trips is negligible (assumed less than 50 per year). This amount of operational traffic would not reduce any Level of Service (LOS) or other performance standard for the local and regional circulation system. Therefore, this analysis focuses only on trips generated during project construction.

As described in Section 8 (Description of Project) within this document, the maximum number of construction employees on each site at any one time is forecast to be about 20 persons and the maximum number of truck deliveries of equipment and material would be 10 trucks per day to each site. This would result in a worst-case of 35 vehicle trips per day (truck trips have been increased using a Passenger Car Equivalent [PCE] of 1.5) at each site. Because the projects would be constructed simultaneously or have overlap, they could combine for a total of 70 trips per day on the local and regional roadways providing access. However, worst-case daily trips would only occur temporarily during the 12-16 week construction period. The temporary addition of these trips to the local transportation network providing access to the site would not reduce any LOS identified within the City of San Bernardino General Plan Circulation Element for performance of the local circulation network.

The temporary addition of 70 total daily trips during construction would result in the following increase to regional freeways providing access to the project sites:

- Interstate 10: The addition of 70 daily trips during construction would only account for a 0.03 percent temporary increase over 2014 average daily traffic volume of 205,000 near the project sites (at Tippecanoe Avenue)
- Interstate 215: The addition of 70 daily trips during construction would only account for a 0.05 percent temporary increase over 2014 average daily traffic volume of 136,000 near the project sites (at West 2nd Street)

The negligible increase in traffic volumes during project construction and operation would not reduce the LOS or other performance standards identified for I-10 by Caltrans, nor require a Traffic Impact Study to be completed for the project. This impact would be **less than significant and no mitigation is required.**

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b.	Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards		\square	
	established by the county congestion management agency for designated roads or highways?			

16b. Response: (Source: San Bernardino Association of Governments (SANBAG) – Congestion Management Program)

Both Interstate 10 and 215 are part of the San Bernardino County Congestion Management Program. As discussed in Response 16a, the maximum addition of 70 daily trips temporarily to these freeways would not reduce the LOS or other performance standards identified within the Congestion Management Program. This impact would be **less than significant and no mitigation is required.**

c.	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?			\boxtimes	
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ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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16c. Response: (Source: General Plan Figure LU-4 – San Bernardino International Airport Planning Boundaries)

The proposed project sites are located approximately 2.2 miles northwest of San Bernardino International Airport and are designated within the "Airport Influence Area" by the General Plan. Each project facility is located at distances from this airport and does not include any structures of height requiring Federal Aviation Administration airspace obstruction review. While solar PV facilities can generate glare, given the distance of the site to the airfield and the orientation of runways not directing air traffic directly over the sites, any glare from project arrays is not anticipated to have any impact on air navigation. Therefore, construction and operation of the proposed project would have no impact to existing air traffic patterns or result in a change in air traffic levels that could create a substantial safety risk. This impact would be **less than significant and no mitigation is required.**

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

16d. Response:

Construction, operation, and decommissioning of each PV project would not require any temporary roadway or lane closures/disruptions that could affect traffic flow. The project would not introduce any new public roadways or incompatible uses. All construction access and egress would occur from a secured controlled main gate located at each site entrance on East 6th Street. This roadway and the proposed location of each site access point have excellent line-of-sight to ensure construction related traffic ingress and egress would not pose any safety hazard. **No impacts are anticipated**.

		-		
e. Result in inadequate emergency	access?			\boxtimes

16e. Response:

Construction, operation, and decommissioning of each PV project would not require any temporary roadway or lane closures/disruptions that could affect emergency response. No impacts are anticipated.

f.	Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities)?				\boxtimes	
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16f. Response:

Construction, operation, and decommissioning of each PV project would not require any temporary roadway or lane closures/disruptions that could affect the movement of public transit, bicycles, or pedestrians and would not affect any program pertaining to these modes of transportation. **No impacts are anticipated**.

17. UTILITIES AND SYSTEM SERVICES. Would the project:			
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?		\boxtimes	

INFORMATION SOURCES):	Impact With Mitigation Incorporated
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17a. Response:

Currently the proposed project sites are vacant, with the exception of the pump house located at the northeast end of the Scheuer site. The proposed project would not create any new habitable structures. During construction, the only wastewater generated would be from the on-site workforce (a maximum of 20 construction employees at each site throughout the three and a half-month construction period). Portable toilets would be provided on-site during construction. All wastewater generated by these facilities during the temporary construction period would be disposed of by the portable toilet provider under their allowable discharge permits. Once operational, no personnel would be on-site during the majority of operation as maintenance requirements would be limited. No other water would require treatment by a wastewater treatment plant. Given the brief timeframe for construction and small overall workforce, negligible new wastewater would be generated by the proposed project. This impact would be **less than significant and no mitigation is required.**

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			\boxtimes	
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17b. Response:

As discussed in Response 17a, negligible new wastewater would be generated by the proposed project. As discussed in Response 17d (below), potable water needs of the proposed project are expected to be within the provider's existing capacity. No new water or wastewater treatment facilities or expansions are required due to the PV project. This impact would be **less than significant and no mitigation is required.**

c.	Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?		\boxtimes			
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17c. Response:

Construction of each PV facility may slightly alter the existing drainage patterns due to any grading, fill, or compaction that is required to accommodate the placement of PV arrays, foundations or footings, and access roads. Development of the Scheuer array includes the construction of a new stormwater line to ensure adequate stormwater flows. Engineering design plan (90%) for the Garner site determined new stormwater lines were not necessary and all stormwater could be managed using off-site facilities.

During construction, the proposed project would use water for soil conditioning and dust suppression over the three and a halfmonth construction period. However, use of water for dust suppression is completed in a manner to avoid runoff into the stormwater system. Construction drainage would be designed to maintain or reduce discharge of stormwater runoff in compliance with the project's SWPPP, as required by the State Water Resources Control Board. Preparation of the SWPPP would include project information, design features, and monitoring and reporting procedures. The SWPPP would be based on final engineering design for all of the project components, which include support beams, module rail assemblies, PV modules, inverters, transformers, and buried electrical cables. During operation, the proposed solar PV facilities would require minimal water use for periodic washing of the PV modules and dust control measures, none of which is expected to enter the stormwater system. To ensure incorporation of stormwater drainage features into the project design, as well as compliance with the SWPPP, MM WQ-1 is proposed. **Implementation of MM WQ-1 would reduce impacts to less than significant levels.**

d.	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?			\boxtimes		
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ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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17d. Response: (Source: City of San Bernardino General Plan Chapter 13; SBV Water Conservation District- Engineering Investigation of the Bunker Hill Basin 2013-2014)

The City of San Bernardino's entire source of water is from the Bunker Hill Basin, which is an underground aquifer. According to the San Bernardino Valley Water Conservation District's 2014 Engineering Investigation, the amount of water to be withdrawn from Bunker Hill Basin during the July 2014 to June 2015 water year was estimated to be 106,173 acre-feet (includes both agriculture and non-agriculture uses).

During construction of the proposed project, water would be required for dust suppression. Construction water use would be short-term (12 to 16 weeks) and is assumed to not exceed 10 acre-feet. During project operation, the solar panels would be periodically washed, with less than one pint of water needed to clean each panel resulting in a water usage of 0.004 acre-feet per year. It is likely that water use during the decommissioning period would be similar or less than water used during the construction period. The overall water use for construction, operation and decommissioning would be a negligible percentage of the total amount of water that is extracted annually from Bunker Hill Basin. Impacts to water supplies would be **less than significant with no mitigation required.**

e.	Result in a determination by the wastewater treatment		\boxtimes	
	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?			

17e. Response:

The proposed project would generate minimal wastewater during construction, operation, and decommissioning. As discussed in Responses 17a and 17b, existing wastewater treatment facilities would adequately accommodate the minor demand caused by the project while serving existing commitments. Impacts to wastewater treatment will be **less than significant with no mitigation required.**

f.	Be served by a landfill with sufficient permitted capacity to		\ge	
	accommodate the project's solid waste disposal needs?			

17f. Response: (Source: CalRecycle Facility Information Toolbox; San Bernardino County of Public Works)

Construction would generate waste that may include cardboard, wood pallets, copper wire, scrap steel, common trash, and wood wire spools. Maintenance activities would also produce a small amount of solid waste such as broken and rusted metal, defective or malfunctioning modules, electrical hardware, empty containers, and any refuse commonly generated by workers. When decommissioned, the site would generate waste in the form of retired PV arrays and facilities. The project applicant would recycle all materials as appropriate, and materials that could not be recycled would be disposed of in accordance with federal, State, and local regulations.

For solid waste disposal, there are two possible landfills that would serve the project area. The San Timoteo Landfill is located approximately 10 miles southeast of the project sites and the Mid-Valley Landfill is approximately 11 miles northwest of the project sites. According to CalRecycle, the average annual throughput at both landfills does not exceed the annual capacity. Therefore, either landfill would have sufficient capacity to accommodate the project's solid and non-hazardous waste disposal needs. Impacts to solid waste disposal would be **less than significant with no mitigation required.**

g.	Comply with federal, state, and local statutes and regulations		\boxtimes
	related to solid waste?	 	

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
		Incorporated		

17g. Response: (Source: San Bernardino County of Public Works)

Solid waste disposal is governed by California State Assembly Bill 939 (AB939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB939 requires counties to prepare an Integrated Waste Management Plan and a Source Reduction Recycling Element to achieve landfill diversion goals and stimulate local recycling. The Solid Waste Advisory Task-Force of San Bernardino County carries out the responsibilities mandated by the State of California through AB 939. The proposed project would operate in accordance with the applicable requirements. During construction, operation, and decommissioning, all materials and debris would be collected and separated for recycling where available. As identified in Response 17f, the landfill serving the site would have sufficient capacity to accommodate the project's solid waste disposal needs. Therefore, the proposed project would comply with federal, State, and local statutes and regulations related to solid waste disposal limits and landfill capacities. **No impacts are anticipated to occur.**

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

18a. Response:

Section 4 (Biological Resources) of this Initial Study describes the type and severity of impacts to biological resources that could occur from construction and operation of the proposed project. As discussed throughout this document, the proposed sites are vacant parcels within an urban environment that lack native habitat capable of supporting any locally known listed and/or sensitive species. The project sites are not located in the vicinity of a biological resource management area or a habitat conservation plan. Construction and operation activities would not create temporary or permanent impacts to sensitive or protected habitat or species, nor would the project affect the movement of any fish or wildlife species.

There are no known historical resources, unique archaeological resources, tribal cultural resources, human remains, or paleontological resources or geologic features located at the Scheuer and Garner project sites. Therefore, no major periods of California history or prehistory are represented within the project sites. Section 5 (Cultural Resources) of this Initial Study describes the potential of encountering undiscovered (e.g., buried) historical resources, unique archaeological resources, tribal cultural resources, and human remains within the project sites. **Implementation of mitigation measures MM CR-1 through MM CR-45 would reduce impacts to less than significant**. The ultimate treatment of any resource would be developed individually after it has been discovered and in consultation with the appropriate resource specialists.

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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With	Less Than Significant Impact	No Impact
		Mitigation		
		Incorporated		

18b. Response:

The project does not have significant impacts that are individually limited but cumulatively considerable. The Project is the construction and operation of two separate PV solar system sized at approximately <u>1.00.75</u> and 3.0 MW, which will provide RPU with a source of renewable energy. The Project is not considered growth-inducing as defined by State CEQA Guidelines.

As discussed in item 7 Greenhouse Gas Emissions, the Project will result in emissions of the GHG CO2 as a byproduct of combustion of gasoline and diesel fuel in construction equipment, construction worker commute trips, in addition to an increase of CO2 emissions associated with the production of electricity to serve the Project. However, the Project's operational emissions of criteria pollutants are less than the SCAQMD regional operational thresholds, and the Project is consistent with the measures identified by the CARB's Scoping Plan. <u>The mitigation measures as listed in this document and as explained herein would reduce impacts to less than significant.</u> Therefore, the Project's contribution to global climate change is not considered cumulatively considerable.

The proposed project would not result in any significant long-term impacts that would substantially combine with impacts of other current and probable future impacts. Consequently, the proposed project would create less than significant impacts with no mitigation required that are cumulatively considerable from an operational standpoint. Further, The Project is not considered growth-inducing as defined by State CEQA Guidelines.

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

18c. Response:

The preceding sections of this Initial Study discuss various types of impacts that could have adverse effects on human beings, including:

- Dust and air pollutant emissions during project construction activities (see Section 3, Air Quality), and
- Potential release of gasoline, diesel fuel, oil, and lubricants associated with construction equipment and other vehicles (see Section 8, Hazards and Hazardous Materials).

These are temporary impacts associated with project construction activities. Each type of impact with the potential to cause substantial adverse effects on human beings has been evaluated, and this Initial Study concludes that all of these potential impacts are either less than significant or can be mitigated to a less than significant level with implementation of standard mitigation measures. The mitigation measures as listed in this document and as explained herein would reduce impacts to less than significant. Therefore, the proposed project would not involve any activities, either during construction or operation, which would cause significant unavoidable effects on human beings, and project impacts will be readily mitigated to less than significant levels.

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party ¹	Monitoring/Reporting Method
Aesthetics	MM VIS-1: The project applicant shall provide the City of San Bernardino a Landscaping/Screening Conceptual Plan consistent with City of San Bernardino Development Code Chapter 19.28 (Landscaping Standards) for review and approval.	Prior to construction	Public Utilities Department	Construction inspection
Biological Resources	MM BIO-1: Employees shall be trained to ensure that all workers on-site (including contractors) are aware of all applicable mitigation measures for biological resources. Specifically, workers shall be required to: (1) limit all activities to approved work areas; (2) pick up and properly dispose of any food, trash or construction refuse; and (3) report any spilled materials (oil, fuel, solvent, engine coolant, raw concrete, or other material potentially hazardous to wildlife) to the site supervisor.	Prior to and during construction	Public Utilities Department	Documentation to be submitted to Public Utilities Department by Site Supervisor.
Biological Resources	MM BIO-2: All trash and food materials shall be properly contained within vehicles or closed refuse bins while on any site, and shall be regularly removed from the site (at least on a weekly basis) for proper disposal. All refuse from construction activities shall be removed from the work site upon completion of work. No raw cement, concrete or washings thereof, asphalt, paint, oil, solvents, or other petroleum products, or any other substances that could be hazardous to vegetation or wildlife resources, shall be disposed of on-site or allowed to spill onto soil. Cleanup of any spilled material shall begin immediately.	During construction	Public Utilities Department	Construction Inspection.
Cultural Resources	MM CR-1: In the event that unanticipated resources are encountered during ground-disturbing or other construction activities, work must cease within 50 feet of the discovery and a County Cultural Resources Specialist and tribal representatives from San Manuel Band of Mission Indians, Soboba Band of Luiseno	During construction	Public Utilities Department	Departmental Notification to Representative Native American Party

Staff Recommended Mitigation Measures

¹ All agencies are City of Riverside Departments/Divisions unless otherwise noted.

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party ¹	Monitoring/Reporting Method
Cultural Resources	Indians and Gabrieleño Band of Mission Indians notified by phone and email. Work may continue only after the resources are recorded and evaluated by a cultural resources specialist who meets or exceeds the Secretary of the Interior Professional Qualification Standards in archaeology and examined tribal representatives qualified to identify tribal cultural resources as defined in AB 52 (PRC § 21080.3.1(a)). MM CR-2: In accordance with Section 7050.5 of the California Health and Safety Code and PRC Section 5097.98, if human remains are found, the San Bernardino County Coroner shall be notified within 24 hours of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie potential remains shall occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains do not require an assessment of cause of death and that the remains are or are believed to be Native American, the Coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours. In accordance with Section 5097.98 of the California Public Resources Code, the NAHC must immediately notify those persons it believes to be the Most Likely Descendent (MLD) of the deceased Native American. The descendants shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the County, the disposition of the human	During construction	Public Utilities Department	Departmental Notification to Representative Native American Party
Cultural Resources	remains. MM CR-3: Ground-disturbing activities related to construction, which extend 1 foot below the modern ground surface, shall be monitored by a cultural resources monitor. Monitoring shall be conducted by a qualified archaeologist familiar with the types of	During construction	Public Utilities Department	Departmental Notification to Representative Native American Party

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party ¹	Monitoring/Reporting Method
	 historical and prehistoric resources that could be encountered within the approved project area, and under direct supervision of a cultural resources specialist who meets or exceeds the Secretary of the Interior Professional Qualification Standards in archaeology. Scheuer: Full time monitoring within 10 feet of historic Warm Creek Channel. Part-time 			
	monitoring at all other locations where disturbance extends below 1 foot.			
	■ Garner: Full time monitoring. In the event cultural resources are identified by the qualified archaeological monitor at either site, the three Native American tribes who have expressed an interest in the site shall be notified. One Native American monitor shall be arranged to monitor further activities. In the event the City and the interested Tribes cannot agree upon the monitor, then the City shall select a monitor and arrange for that monitor. The intensity of Native American monitoring (full or part time) will be determined by both tribal and archaeological specialists, based on the nature of the find and the possibility of finding additional resources. One Native American monitor shall be hired if cultural resources are identified by the qualified archaeological monitor at either site. The intensity of Native American monitoring (full or part time) will be determined by both tribal and			
	archaeological specialists, based on the nature of the find and the possibility of finding additional resources.			
Cultural Resources	MM CR-4: The cultural resources monitor shall document interim results of the construction monitoring program with daily monitoring logs and photographs. At the conclusion of monitoring a summary of the results shall be prepared.	During construction	Public Utilities Department	Departmental Notification to Representative Native American Party

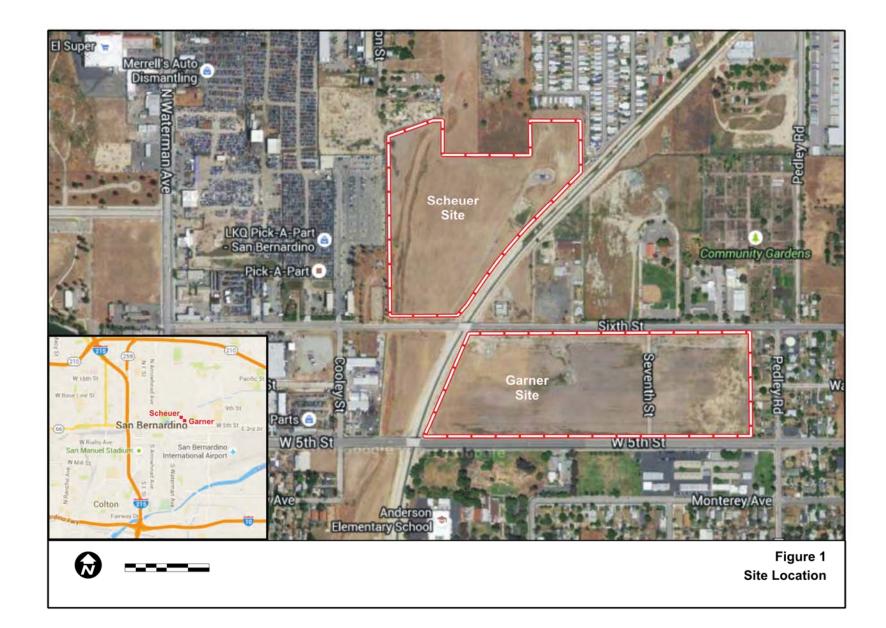
Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party ¹	Monitoring/Reporting Method
	If no resources were identified, copies of the daily logs and a brief letter report summarizing the monitoring activities will be submitted to the project owner and the CEQA lead agency.			
	If resources were identified during monitoring, a cultural resources report shall be prepared and all work must be halted within 50 feet of the discovery. The report shall be written by or under the direction of a cultural resources specialist who meets or exceeds the Secretary of the Interior Professional Qualification Standards in archaeology and shall be provided in the State of California Archaeological Resource Management Report format. The final document shall report on all field activities including dates, times and locations, results, samplings, and analyses. All Department of Parks and Recreation (DPR) 523 forms, data recovery reports, and any additional research reports shall be included as appendices. This report shall be submitted to the project owner, the CEQA lead agency and the California Historical Resource Information System (CHRIS).			
	Any information gathered during tribal AB 52 consultation may not be shared with the public without prior written tribal consent. The report will conform with these confidentiality requirements (PRC § 21080.3.2).			
<u>Cultural</u> <u>Resources</u>	MM-CR5: The project owner shall invite the Gabrieleno Band of Mission Indians – Kizh Nation ("Gabrieleno") to the project kickoff/pre-construction meeting where the project schedule will be outlined in detail. The project owner will notify the Gabrieleno 5 business days prior to pre-construction meeting and commencement of ground disturbing work in order to provide them an opportunity to assign a tribal monitor to visit the site. Ground-disturbing activities related to construction - including but not limited to pavement	Prior to and during construction	Public Utilities Department	Departmental Notification to Representative Native American Party

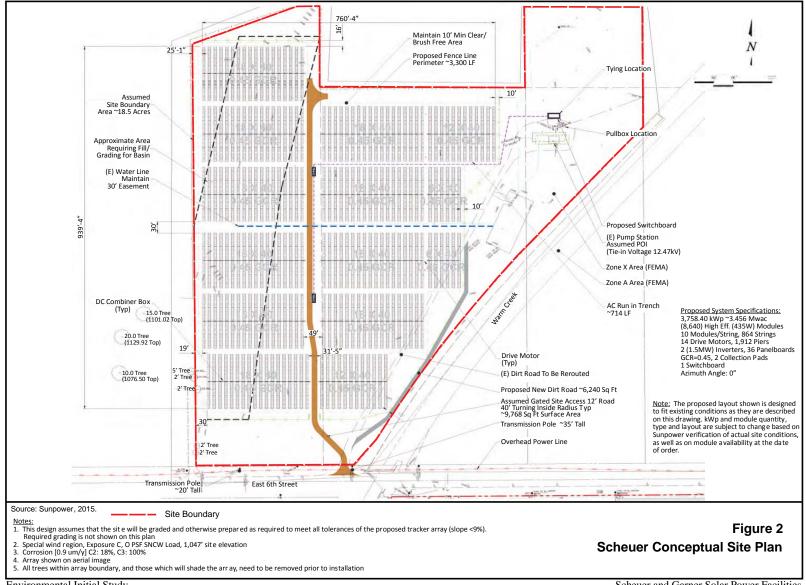
Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party ¹	Monitoring/Reporting Method
Hazards& Hazardous Materials	removal, pot holing or auguring, boring, grading, excavation and trenching - may be monitored full- time by one tribal monitor per project site. Gabrileno to provide at their cost, the tribal monitor. Gabrieleno to provide at their cost, the tribal monitor. Prior to entering the project site, the tribal monitor shall receive proper safety training and execute an Agreement to Release All Liability. MM HAZ-1: The applicant shall prepare a hazardous materials business plan to ensure proper storage, transport, and disposal of hazardous waste generated at each proposed project site during	Prior to construction	Public Utilities Department	Hazardous Materials Business Plan completion and approval
	construction. An alternate or amended business plan shall be prepared for waste generated at the site during operation. At a minimum, the hazardous materials business plan shall be in compliance with California Health and Safety Code Chapter 6.5. The plan shall comply with all future revisions and updates to the regulations. Such a plan would enable workers to respond to any potential release of hazardous materials and ensure quick and safe cleanup. The plan shall include measures to implement emergency response procedures to reduce the potential for contamination and exposure of workers or the public to hazardous materials in the event of an accidental spill, by providing various measures to ensure that any spilled material is contained and any resulting			
Hydrology and Water	surficial contaminated soil was quickly cleaned up and disposed of properly. The plan will be provided to the City of Riverside and the City of San Bernardino within 30 days of the start of construction. MM WQ-1: The applicant shall prepare and implement a Stormwater Pollution Prevention Plan	Prior to construction.	Public Utilities Department	Construction Inspection
Quality	 (SWPPP). The SWPPP shall: Identify water quality Best Management Practices (BMPs) to minimize erosion and to guide the clean-up of any accident, per the California Stormwater BMP Handbook; 			

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party ¹	Monitoring/Reporting Method
	 Identify potential pollutant sources that may affect water quality; and Identify monitoring and reporting procedures to 			
	 Identify monitoring and reporting procedures to ensure all BMPs are adhered to during construction and operations. 			
Hydrology and Water Quality	MM WQ-2: The applicant shall review the final site plan prior to construction to verify that all staging areas, PV arrays, and other associated equipment are to be located outside of the 100-year flood plain as mapped by the Federal Emergency Management Agency. If any structures are proposed within the flood plain, the applicant will revise the site plan prior to construction to relocate those structures outside of the flood plain.	Prior to construction	Public Utilities Department	Documentation by Public Utilities Department

ATTACHMENT A

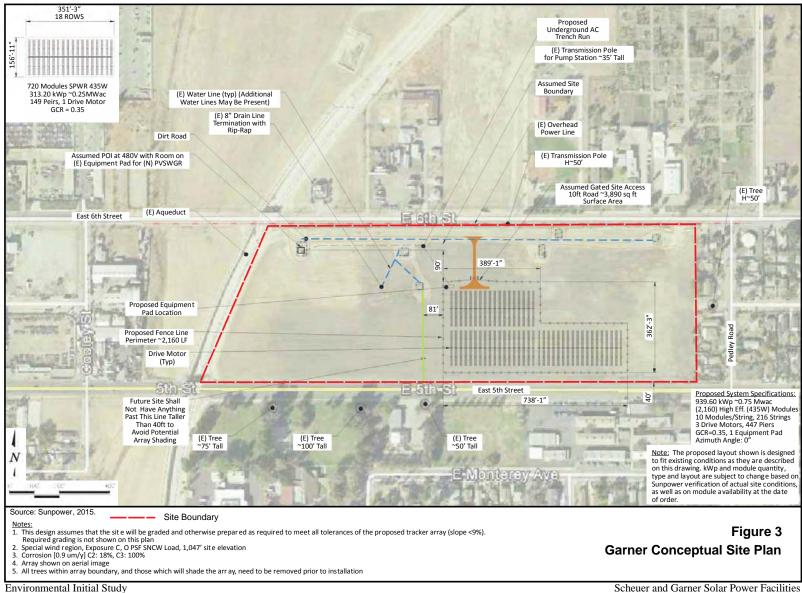
PROJECT FIGURES





Environmental Initial Study

Scheuer and Garner Solar Power Facilities



Scheuer and Garner Solar Power Facilities