



# Project 9 Fontana

15894 Valley Blvd, Fontana, CA 92335

Categorical Exemption Report

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## **Categorical Exemption Report**

This report documents the environmental analysis prepared for the City of Fontana for the 15894 Valley Boulevard Project (Project) located in the City of Fontana, San Bernardino County. The intent of this analysis is to document that the project is exempt from the provisions of the California Environmental Quality Act (CEQA) under the Class 32 Categorical Exemption pursuant to CEQA Guidelines Section 15332. This report provides an introduction, project description, and evaluation of the project's consistency with the requirements for a Class 32 exemption. The report concludes that the project is eligible for a Class 32 Categorical Exemption.

### **1. Introduction**

The City of Fontana (City) proposes to adopt a Class 32 Categorical Exemption for the proposed project. Pursuant to CEQA Guidelines Section 15332, a Class 32 Categorical Exemption applies to projects characterized as in-fill development meeting the following conditions:

- a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
- b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
- c) The project site has no value as habitat for endangered, rare, or threatened species.
- d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
- e) The site can be adequately served by all required utilities and public services.

Additionally, this report documents that none of the exceptions to the Class 32 Categorical Exemption in CEQA Guidelines Section 15300.2 apply to the project. These exceptions relate to cumulative impacts, significant effects due to unusual circumstances, scenic highways, hazardous waste sites, and historical resources. A full listing of these exceptions and an assessment of their applicability to the proposed project is provided in this report.

The City evaluated the project's consistency with the above requirements, including its potential impacts on the subjects of biological resources, traffic, noise, air quality, water quality, and historic resources, to confirm the project's eligibility for a Class 32 exemption.

## 2. Project Description

### Project Location and Setting

As shown in Figure 1, the Property consists of 4.07 acres located at the northwest corner of Valley Boulevard and Catawba Avenue. To the west and south of the Property are various industrial uses on parcels designated Light Industrial. Commercial uses are located to the east and residential uses are directly north of the Property.

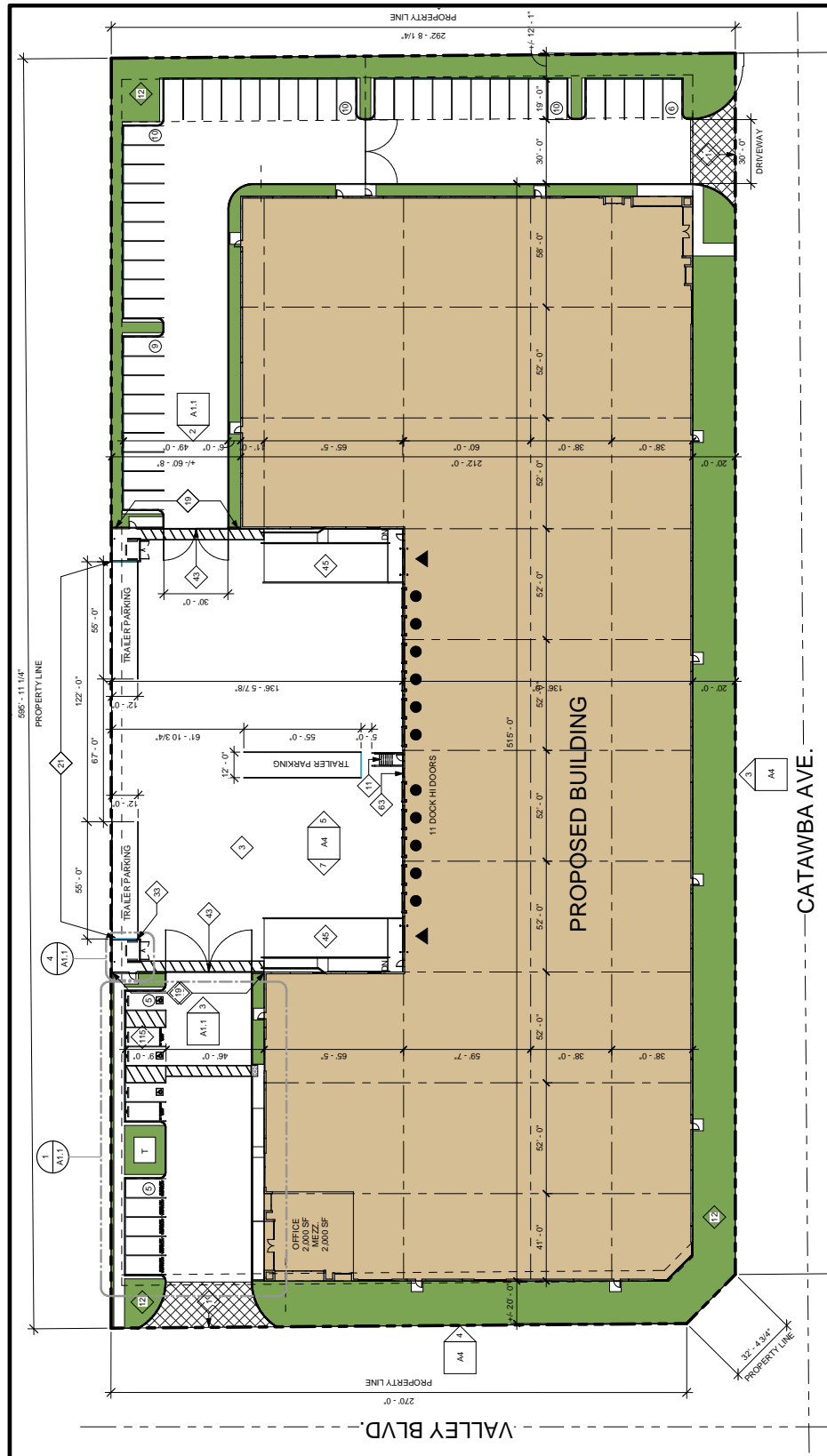
**Figure 1**



## **Project Characteristics**

As shown in Figure 2, the Project consists of the construction of an 92,433 square foot warehouse building (warehouse use – 88,433 sq. ft., office – 2,000 sq. ft., mezzanine – 2,000 sq ft.) with a floor area ratio (“FAR”) of 0.531. For parking, the site plan provides 58 spaces (48 standard, 2 ADA, 1 Van ADA, 1 ADA EV VAN, 3 EVCs, 3 Clean Air). Three (3) truck trailer parking spaces are provided. The Project site plan provides 24,718 square feet of landscaping (29.5% lot coverage, exclusive of proposed building). The warehouse building is proposed to be set back approximately 66 feet from the residential uses to the north of the Property, 20 feet from both Valley Boulevard and Catawba Avenue, and between approximately 59 and 72 feet from the industrial use to the west of the Property.

### Figure 2



### 3. Consistency Analysis

#### Criterion (a)

*The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.*

#### General Plan

The Property is designated I-L, Light Industrial, under the City's General Plan. The I-L land use category is defined as follows:<sup>1</sup>

**I-L: Light Industrial (0.1-0.6 FAR).** Employee-intensive uses, including business parks, research and development, technology centers, corporate and support office uses, clean industry, supporting retail uses, truck and equipment sales and related services are allowed. Warehouses that are designed in ways that limit off-site impacts are also permitted.

The project is consistent with the General Plan designation.

#### General Plan Policies

The project is consistent with all applicable General Plan Policies, as shown in Table 1 below.

**Table 1: Consistency with Fontana General Plan**

Policy	Consistency
<b>Land Use Element</b>	
<ul style="list-style-type: none"><li>• Locate high-quality industrial uses where there is appropriate access to regional transportation routes</li></ul>	The project site is located on a major arterial (Valley Boulevard) and is one block from the I-10.

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<sup>1</sup> City of Fontana 2015-2035 General Plan, Chapter 15, Land Use, Zoning and Urban Design, pgs.15.25-15.26.  
<https://www.fontana.org/DocumentCenter/View/26754/Chapter-15---Land-Use-Zoning-and-Urban-Design>

<ul style="list-style-type: none"> <li>• Promote the Southwest Industrial Park and the I-10 corridor as preferred locations for industrial uses.</li> </ul>	<p>The project site is located on a major arterial (Valley Boulevard) and is one block from the I-10.</p>
<b>Noise and Safety Element</b>	
<ul style="list-style-type: none"> <li>• Noise spillover or encroachment from commercial, industrial and educational land uses shall be minimized into adjoining residential neighborhoods or noise-sensitive uses.</li> </ul>	<p>As addressed in more detail below regarding the project's compliance with criterion (d) of the Class 32 Categorical Exemption, the project will comply with all applicable noise standards and regulations, ensuring that noise spillover from the site is minimized.</p>
<ul style="list-style-type: none"> <li>• Residential land uses and areas identified as noise-sensitive shall be protected from excessive noise from non-transportation sources including industrial, commercial, and residential activities and equipment.</li> </ul> <p><i>Actions</i></p> <p>A. Projects located in commercial areas shall not exceed stationary- source noise standards at the property line of proximate residential or commercial uses.</p> <p>B. Industrial uses shall not exceed commercial or residential stationary source noise standards at the most proximate land uses.</p> <p>C. Non-transportation noise shall be considered in land use planning decisions.</p> <p>D. Construction shall be performed as quietly as feasible when performed in</p>	<p>As addressed in more detail below regarding the project's compliance with criterion (d) of the Class 32 Categorical Exemption, the project will comply with all applicable noise standards and regulations during construction and operation.</p>

proximity to residential or other noise sensitive land uses.	
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## Zoning Designation and Regulations

The Property is zoned M-1, Light Industrial. The Fontana Municipal Code (“FMC”) defines the M-1 district as an “industrial zoning district that accommodates employee-intensive uses, such as business parks, research and technology centers, offices, and supporting retail uses, high cube/warehousing which does not permit heavy manufacturing, processing of raw materials, or businesses logistics which generate high volumes of truck traffic.” FMC § 30-522(1).

In the M-1 district, warehouses are a permitted use subject to specific requirements. FMC Table No. 30-530(5). The intent of the specific regulations is to “provide for well-planned and orderly development of business parks and warehousing distribution/logistic uses” in the M-1 zoning district. FMC § 30-532(7). The Table 1 below details the specific warehouse regulations for the M-1 zoning district. The proposed project is consistent with the City’s zoning requirements.

**Table 2: Project Consistency with Applicable Zoning Regulations**

<b>Regulation</b>	<b>FMC Minimum Standard<sup>2</sup></b>	<b>Project Compliance</b>
<b>Minimum lot size</b>	20,000 square feet	Yes – 177,151 sq. ft. (gross); 174,210 sq. ft. (net)
<b>Lot minimum width</b>	150 feet	Yes – 292 ft, 9 in.
<b>Lot minimum depth</b>	150 feet	Yes – 591 ft, 3 in.
<b>Maximum building height</b>	75 feet	Yes - Less than 75 feet

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<sup>2</sup> FMC § 30-532(7)(a), Table No. 30-532, unless otherwise indicated.



<b>Maximum lot coverage</b>	60%	Yes – 53.1%
<b>Maximum FAR</b>	0.60	Yes – 0.531
<b>Building setback from existing residential use and zone</b>	Minimum 45 feet	Yes – 66 ft., 3 in.
<b>Building setbacks from streets</b>	20 feet; All required yard areas shall be clear of all structures and shall be landscaped and maintained in a neat and healthy condition. FMC § 30-536(2), Table 30-536.B.	Yes – 20 feet from both Valley Boulevard and Catawba Avenue
<b>Interior yard building setback</b>	<p>Abutting residential or C-1 zoning district – 30 feet</p> <p>Abutting all other zoning districts – 5 feet</p> <p>FMC § 30-536(2), Table 30-536.B.</p>	<p>Yes – Abutting residential zoning district – 66 ft., 3 in.</p> <p>Abutting industrial district – between 59 ft. - 71 ft., 9 in.</p>
<b>Parking and Drive Aisle setback from streets</b>	<p>Valley Boulevard – 25 feet (for parking)</p> <p>Other streets – 20 feet</p> <p>FMC § 30-356(2), Table 30-536.C</p>	Yes – parking and drive aisles appear to be in excess of 25 feet from Valley Boulevard and in excess of 20 feet from Catawba Avenue
<b>Parking and drive aisle interior and rear setback</b>	Abutting residential or C-1 zoning district – 10 feet	Yes – Abutting residential zoning district – 10 feet

	<p>Abutting all other zoning districts – 5 feet</p> <p>FMC § 30-536(2), Table 30-536.C.</p>	<p>Yes – Abutting industrial district – setback varies between 6 feet, 9 inches and 5 feet, 4 inches.</p>
<b>Building orientation</b>	<p>No truck loading/unloading area shall be located adjacent to existing residential uses. A building may be utilized to separate the truck loading/unloading area from existing residential uses. FMC § 30-532(7)(b).</p>	<p>Yes – Truck loading/unloading area adjacent to industrial use to the west and separated from the residential use by the building.</p>
<b>Parking location</b>	<p>The placement of buildings and parking lots shall emphasize the attractive designs of buildings with less emphasis on parking lots. On-site parking shall be buffered from the right-of-way through screen walls, mounding and landscaping and/or building placement. Furthermore, visitor and/or employee parking may be located at the front of the building adjacent to the main entry. FMC § 30-532(7)(c).</p>	<p>Yes – The majority of the Project parking is located adjacent to the industrial use to the west.</p>
<b>Parking</b>	<p>One parking space is required for each 1,000 square feet of gross floor area for the initial 20,000 square feet,</p>	<p>Yes – Total parking required: 41 spots; Total parking provided: 55 spots</p>

	<p>One parking space is required for each 2,000 square feet of additional gross floor area for the next 20,000 square feet, and</p> <p>One parking space is required for each 5,000 square feet of additional gross floor area over 40,000 square feet,</p> <p>No additional parking spaces are required for the office area, if office area is less than ten percent of total building square footage.</p> <p>FMC Table No. 30-685.A; §§ 30-690 through 30-703</p>	
<b>On-Site Loading Spaces</b>	<p>From 5,000 to 30,000 square feet, one space; and</p> <p>One additional space for each additional 30,000 square feet.</p> <p>FMC Table No. 30-704.</p>	Yes – 3 loading spaces required; 11 dock doors provided.
<b>Trailer Parking</b> (Applicable to Logistics, Distribution Facilities (High Cube) and <b><u>Warehousing Facilities</u></b> )	<p>1 trailer space 12 feet x 52 feet for every four bay doors for buildings 199,999 square feet and smaller (round up to nearest whole number).</p> <p>FMC § 30-704a.</p>	Yes – 3 trailer spaces required (based on 11 dock doors), 3 trailer spaces provided.

<b>Bicycle parking</b>	One bicycle space is required for each 30,000 square feet of gross floor area.  FMC Table 30-714.	Yes – 3 bicycle parking spaces will be provided.
<b>Walls</b>	A minimum 10-foot high wall is required adjacent to existing residential uses. A higher wall may be required for noise and/or screening purposes. FMC § 30-532(7)(d).	Yes – a 10-foot high wall will be constructed along the property line shared with residential use.
<b>Landscaping</b>	No less than 15% of the total area of the property not covered by buildings, structures, or areas used for outside storage or loading.  FMC § 30-674(b); see §§ 30-674 through 30-677.	Yes – 27.4%

Additional zoning regulations apply to the project, and the project complies with all of them, as discussed below. The following trip reduction measures (FMC § 30-554) are applicable to the project:

- Bicycle parking racks or secured bicycle lockers are required at a rate of one bicycle parking space per 20 automobile parking spaces.
- On-site pedestrian walkways and bicycle paths shall be provided connecting the building to public streets and sidewalks or transit stops.
- Preferential parking spaces which are signed and striped for vanpools and carpools shall be provided at a minimum rate of ten percent of employee vehicle parking for all new nonresidential developments of 20,000 square feet or greater.
- A passenger loading area equivalent to a minimum of three parking spaces shall be provided in a location close to the main building entrance or employee entrance,

designed not to interfere with vehicular circulation, for all new nonresidential developments of 50,000 square feet or greater.

- Parking spaces shall be designed with a minimum vertical clearance of seven feet two inches to accommodate vanpool vehicles.
- All new nonresidential developments with 20,000 square feet or greater shall provide an information area easily accessible to employees that offers information on available transportation alternatives, such as: metro link service schedules, transit route schedules and maps, rideshare matching services, available employees or customer incentives and air quality information.
- Sidewalks shall be provided for all new developments in accordance with the City General Plan, Circulation Element.

Industrial uses cannot create or cause to be created any sound as measured at the property line of any residentially zoned property which exceeds 70 db(A) between 7am and 10pm or 65 db(A) between 10pm and 7am. FMC § 30-543. All lights must be directed and/or shielded to prevent the light from adversely affecting adjacent properties. FMC § 30-544. The City requires a photometric plan which indicates the amount of light emanating from proposed light fixtures. *Id.*

The Fontana Municipal Code section 30-532(7)(e) also provides additional minimum architecture standards for warehouses in the M-1 zoning district. Section 30-538 of the Fontana Municipal Code outlines the screening requirements for industrial buildings.

The City's general design guidelines for industrial developments are laid out in FMC § 30-550 – Site Plan Design and FMC § 30-551 – Building Design.

The project complies with all of the preceding FMC provisions.

In summary, the proposed project would be consistent with applicable General Plan land use designation, General Plan policies, zoning designation and regulations. Therefore, the project is consistent with criterion 'a' of State CEQA Guidelines Section 15332, pertaining to Class 32 Categorical Exemptions for infill development projects.

### **Criterion (b)**

*The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.*

The project is located within the City of Fontana city limits and is located on a site less than five acres in size. The project site is substantially surrounded by urban uses: To the west and south of the Property are various industrial uses on parcels designated Light Industrial. Commercial uses

are located to the east and residential uses are directly north of the Property. Therefore, the proposed project is consistent with criteria (b) of State CEQA Guidelines Section 15332, pertaining to Class 32 Categorical Exemption for infill development projects.

**Criterion (c)**

*The project site has no value as habitat for endangered, rare, or threatened species.*

The project site is located on an undeveloped site. A field reconnaissance survey of the study area was conducted to document existing site conditions and the potential presence of sensitive biological resources (Appendix A). The site is largely paved, and primary vegetation communities on the project site include non-native annual grassland and disturbed habitat. No sensitive species were observed during the field survey. Based on the proposed project characteristics and the existing site conditions documented in Appendix A, the project site has no value as habitat for any special-status species plant or wildlife species known to occur in the general region of the project.

**Criterion (d)**

*Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.*

The following discussion documents that the project will not result in any significant effects related to traffic, noise, air quality and greenhouse gas (GHG) emissions, and water quality.

**i. Traffic**

A Trip Generation Assessment for the project was prepared by Urban Crossroads Group in December 2020 and is attached as Appendix B. Trip generation rates were determined for weekday AM peak hour trips, PM peak hour trips, and daily trips for the proposed project based on a mix of cars and trucks. The proposed project would generate 164 two-way trips per day (in actual vehicles), with 15 trips generated during the AM peak hour and 16 trips generated during the PM peak hour. The City's Guidelines require that truck intensive uses translate heavy truck trips to passenger car equivalents (PCE). The project is anticipated to generate 230 two-way PCE trips per day, with 19 PCE AM peak hour trips and 21 PCE PM peak hour trips. Accordingly, the project is anticipated to generate fewer than 50 peak hour trips and fewer than 250 two-way trips per day (both actual and PCE based). As such, a level of service (LOS) based traffic analysis is not required for this Project based on the City of Fontana's Guidelines. Furthermore, the proposed Project use is anticipated to generate fewer trips than a high-cube warehouse use (based on an average rate of all high-cube warehouse uses) of the same square footage.

Urban Crossroads also conducted a Vehicle Miles Travelled (VMT) Screening Analysis for the project, attached as Appendix C. Changes to the CEQA Guidelines were adopted in December 2018, requiring all lead agencies to adopt VMT as a replacement for automobile delay-based level of service (LOS) as the new measure for identifying transportation impacts for land use projects. This statewide mandate went into effect July 1, 2020. To aid in this transition, the Governor's Office of Planning and Research (OPR) released a Technical Advisory on Evaluating Transportation Impacts in CEQA (December of 2018) (Technical Advisory). Using the Technical Advisory as a reference document, the City of Fontana adopted the Traffic Impact Analysis (TIA) Guidelines for Vehicle Miles Traveled (VMT) and Level of Service Assessment (City Guidelines). If a project meets one of the City's screening thresholds, the City's Guidelines do not require more detailed VMT analysis, and the City can conclude that the project is anticipated to result in less-than-significant impacts.

One of the VMT screening thresholds provided by the City Guidelines is whether a project will generate fewer than 500 average daily trips (ADT). Projects that generate fewer than 500 ADT would not cause a substantial increase in the total citywide or regional VMT and are therefore presumed to have a less than significant impact on VMT. For warehousing uses, buildings with 287,000 square feet or less are anticipated to generate less than 500 ADT. The proposed project comprises 92,433 square feet and, as noted above in the discussion of trip generation rates, is anticipated to generate fewer than 500 ADT. Therefore, it is presumed to have a less than significant VMT impact.

Therefore, the project will not result in any significant effects related to traffic.

## **ii. Noise**

A Noise Impact Analysis was prepared for the project by Urban Crossroads in January 2021 and is attached as Appendix D. The Noise Impact Analysis concluded that impacts associated with operational noise, construction noise, nighttime concrete pouring, and construction vibration would all be less than significant.

As noted above in Table 1, the following policy from City's General Plan Noise Element applies to the project:

*Policy:* Residential land uses and areas identified as noise-sensitive shall be protected from excessive noise from non-transportation sources including industrial, commercial, and residential activities and equipment.

*Actions:*

- a) Projects located in commercial areas shall not exceed stationary- source noise standards at the property line of proximate residential or commercial uses.
- b) Industrial uses shall not exceed commercial or residential stationary source noise standards at the most proximate land uses.
- c) Non-transportation noise shall be considered in land use planning decisions.
- d) Construction shall be performed as quietly as feasible when performed in proximity to residential or other noise sensitive land uses.

The City's noise control guidelines for determining and mitigating non-transportation or stationary noise source impacts from operations in neighboring residential areas are found in the FMC Section 30-543. For industrial zoning districts, FMC Section 30-543 indicates that no person shall create or cause to be created any sound which exceeds the noise levels in this section as measured at the property line of any residentially zoned property. The performance standards found in FMC Section 30-543 limit the exterior noise level to 70 dBA Leq during the daytime hours, and 65 dBA Leq during the nighttime hours at sensitive receiver locations.

The City has set restrictions to control noise impacts associated with the construction of the proposed Project. According to FMC Section 18-63(b)(7), Construction or repairing of buildings or structures, construction activity is limited: between the hours of 7:00 a.m. and 6:00 p.m. on weekdays and between the hours of 8:00 a.m. and 5:00 p.m. on Saturdays except in the case of urgent necessity. (13) Project construction noise levels are, therefore, considered exempt from municipal regulation if activities occur within the hours specified in the FMC Section 18-63(7) of 7:00 a.m. to 6:00 p.m. on weekdays and between the hours of 8:00 a.m. to 5:00 p.m. on Saturdays. However, if activity occurs outside of these hours, the City of Fontana stationary-source (operational) noise level standards of 70 dBA Leq during the daytime hours, and 65 dBA Leq during the nighttime hours shall apply.

FMC Section 30-543 also provides that operational vibration levels shall not create or cause to be created any activity that causes a vibration that can be felt beyond the property line with or without the aid of an instrument. For analysis purposes, a peak-particle-velocity (PPV) vibration threshold of 0.2 in/sec PPV is used to determine perception consistent with the FMC requirements based on guidance provided by the Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual.

To present the potential worst-case project noise conditions, the project is assumed to be operational 24 hours per day, seven days per week. It is expected that the project business operations would primarily be conducted within the enclosed buildings, except for traffic movement, parking, as well as loading and unloading of trucks at designated loading bays. At the time this noise analysis was prepared, the future tenants of the proposed project were unknown. The on-site project-related noise sources are expected to include: loading dock activity, entry



gate & truck movements, roof-top air conditioning units, and trash enclosure activity. Per the Trip Generation Assessment (Appendix B), the project is expected to generate a total of approximately 164 vehicular trips per day, which includes 46 truck trips per day.

The Noise Impact Analysis studied five receiver locations (see Figure 3) in the vicinity of the project site, all nearby residences that are considered noise-sensitive land uses.

**Figure 3**



The Noise Impact Analysis modeled noise levels for project noise sources and calculated daytime and nighttime operational noise levels at the receiver locations. As documented in Appendix D, the project's operational noise levels will satisfy the City's 70 dBA Leq daytime and 65 dBA Leq nighttime exterior noise level standards at all nearby receiver locations. Table 3 summarizes the

operational noise levels of the project and their comparison to applicable noise thresholds. Full details of the project's noise levels are included in Appendix D. Therefore, the operational noise impacts are considered less than significant at the nearby noise-sensitive receiver locations.

**Table 3: Operational Noise Level Compliance**

Receiver Location	Project Operational Noise Levels (dBA Leq)		Noise Level Standard (dBA Leq)		Threshold Exceeded?	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	59.2	58.2	70	65	No	No
R2	61.7	60.6	70	65	No	No
R3	63.0	62.0	70	65	No	No
R4	64.3	63.4	70	65	No	No
R5	63.6	62.7	70	65	No	No

The Noise Impact Analysis also modeled noise levels associated with construction activity and calculated associated noise levels at the receiver locations during different construction activities such as site preparation and grading. As noted above, project construction noise levels are considered exempt if activities occur within the hours specified in the FMC Section 18-63(7) of 7:00 a.m. to 6:00 p.m. on weekdays and between the hours of 8:00 a.m. to 5:00 p.m. on Saturdays. If Project construction activity occurs outside of the hours specified in the Municipal Code, noise levels shall satisfy the City of Fontana construction noise level thresholds of 70 dBA Leq during the daytime hours and 65 dBA Leq during the nighttime hours. No project construction activity is planned outside the hours prescribed in FMC Section 16-63(7). Table 4 summarizes the construction noise level compliance for the project. Full details of the construction noise impacts of the project are included in Appendix D.

**Table 4: Construction Noise Levels Compliance**

Receiver Location	Construction Noise Levels (dBA Leq)				
	Highest Construction Noise Levels	Threshold During Specified Hours	Threshold Outside of Specified Hours Daytime	Threshold Outside of Specified Hours Nighttime	Specified Hours Threshold Exceeded?
R1	72.4	Exempt	70	65	No
R2	68.9	Exempt	70	65	No
R3	71.4	Exempt	70	65	No
R4	71.4	Exempt	70	65	No
R5	70.1	Exempt	70	65	No

Appendix D also documents that vibration levels associated with construction equipment at the project will be below the 0.2 in/sec PPV threshold. Therefore, the noise impacts due to project construction noise will be less than significant at all receiver locations as documented in Appendix D.

### **iii. Air Quality & GHG Emissions**

An Air Quality and GHG Impact Analysis was prepared for the project by Urban Crossroads in February 2021 and is attached as Appendix E. Its conclusions are summarized below.

#### **Air Quality**

A significant adverse air quality impact may occur when a project individually or cumulatively interferes with progress toward the attainment of an air quality standard by releasing emissions that equal or exceed the established long term quantitative thresholds for pollutants, or causes an exceedance of a state or federal ambient air quality standard for any criteria pollutant.

Primary criteria pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere. Commonly found primary criteria pollutants include reactive organic gases (ROG), nitric oxides (NOx), carbon monoxide (CO), and particulate matter (PM10 and PM2.5; PM 10 is particulate matter measuring no more than 10 microns in diameter, while PM2.5 is fine particulate matter measuring no more than 2.5 microns in diameter). The project site is located within the South Coast Air Basin and falls under the jurisdiction of the South Coast Air Quality Management District (SCAQMD).

The Basin is designated as a nonattainment area for the federal and state one-hour and eight-hour ozone standards, the state PM10 standards, the federal 24-hour PM2.5 standard, and the federal and state annual PM2.5 standard. The Basin is in attainment of all other federal and state standards. Applicable air quality thresholds and the project's corresponding emissions are summarized below.

#### **a. Construction Emissions**

SCAQMD recommends the quantitative regional significance thresholds for temporary construction activities and long-term project operation in the Basin in order to maintain and achieve attainment for typical criteria pollutants. The significance thresholds and the project's corresponding daily emissions are listed in Table 5:

**Table 5: Project Regional Construction Emissions Summary**

Source	Emissions (lbs/day)					
	VOC	NOx	CO	SOx	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Total Maximum Daily Emissions</b>	<b>31.32</b>	<b>40.55</b>	<b>21.89</b>	<b>0.04</b>	<b>9.29</b>	<b>5.81</b>
SCAQMD Regional Threshold	75	100	550	150	150	55
<b>Threshold Exceeded?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

#### **b. Regional Operational Emissions**

The estimated maximum daily operational emissions are summarized on Table 6. As shown, the Project is not anticipated to exceed the numerical thresholds of significance established by the SCAQMD for emissions of any criteria pollutants so air quality impacts are less than significant.

**Table 6: Project Maximum Operational Emissions**

Operational Activities – Summer Scenario	Emissions (lbs/day)					
	VOC	NOx	CO	SOx	PM <sub>10</sub>	PM <sub>2.5</sub>
Area Source	2.10	1.7E-04	0.02	--	6.0E-05	6.0E-05
Energy Source	5.54E-03	0.05	0.04	3.0E-04	3.83E-03	3.83E-03
Mobile Emissions	0.54	9.95	5.99	0.06	2.75	0.80
<b>Total Maximum Daily Emissions</b>	2.64	10.00	6.05	0.06	2.75	0.80
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>
Operational Activities – Winter Scenario	Emissions (lbs/day)					
	VOC	NOx	CO	SOx	PM <sub>10</sub>	PM <sub>2.5</sub>
Area Source	2.10	1.7E-04	0.02	--	6.0E-05	6.0E-05
Energy Source	5.54E-03	0.05	0.04	3.0E-04	3.83E-03	3.83E-03
Mobile Emissions	0.51	10.22	5.51	0.06	2.75	0.80
<b>Total Maximum Daily Emissions</b>	2.62	10.27	5.57	0.06	2.76	0.80
SCAQMD Regional Threshold	55	55	550	150	150	55

<b>Threshold Exceeded?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>
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### c. Localized Construction Impacts

Table 7 identifies the localized impacts at the nearest receptor location in the vicinity of the Project. Emissions resulting from Project activity construction will not exceed the numerical thresholds of significance established by the SCAQMD for any criteria pollutant. Thus, a less than significant impact would occur for localized Project-related construction-source emissions and no mitigation measures are required.

**Table 7: Project Localized Significance Summary of Construction**

<b>Maximum On-Site Grading Emissions</b>	<b>Emissions (lbs/day)</b>			
	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
<b>Maximum Daily Emissions</b>	<b>40.49</b>	<b>21.15</b>	<b>9.09</b>	<b>5.75</b>
SCAQMD Localized Threshold	237	1,346	12	6
<b>Threshold Exceeded?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

### d. Localized Operational Impacts

The estimated maximum daily localized operational emissions are summarized on Table 8. Table 5 represents all on-site Project-related stationary (area) sources and five percent (5%) of the Project-related mobile sources. As such, the 5% assumption is conservative and would tend to overstate the actual impact. The mobile source emissions also include any potential on-site idling that would occur since CalEEMod calculations are inclusive of on-site idling. Modeling based on these assumptions demonstrates that even within broad encompassing parameters, Project operational-source emissions would not exceed applicable LSTs. As shown below, emissions during operational activity would not exceed the SCAQMD's localized significance thresholds for any criteria pollutant and a less than significant impact would occur.

**Table 8: Project Localized Operational Emissions**

Operational Activity	Emissions (lbs/day)			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Maximum Daily Emissions</b>	<b>0.56</b>	<b>0.10</b>	<b>0.14</b>	<b>0.04</b>
SCAQMD Localized Threshold	237	1,346	4	2
<b>Threshold Exceeded?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

### **Greenhouse Gas Emissions**

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period of time. Climate change is the result of numerous, cumulative sources of GHG emissions.

GHGs occur naturally and from human activities. Human activities that produce GHGs are the burning of fossil fuels (coal, oil and natural gas for heating and electricity, gasoline and diesel for transportation); methane from landfill wastes and raising livestock; deforestation activities; and some agricultural practices. GHGs produced by human activities include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>). Emissions of GHGs affect the atmosphere directly by changing its chemical composition while changes to the land surface indirectly affect the atmosphere by changing the way in which the Earth absorbs gases from the atmosphere. Project activities will result in emissions of GHGs.

The majority of individual projects do not generate sufficient GHG emissions to directly influence climate change. However, physical changes caused by a project can contribute incrementally to cumulative effects that are significant, even if individual changes resulting from a project are limited. SCAQMD has developed significance thresholds applicable to GHG emissions, which the City has applied to the project's GHG emissions, summarized below.

As shown on Table 9, the project would not exceed the screening threshold of 3,000 MTCO<sub>2</sub>e. The 3,000 MTCO<sub>2</sub>e threshold is based on the SCAQMD's screening threshold and has been used by other agencies in southern California, including the City. Thus, project-related emissions would

not have the potential to have a significant direct or indirect impact on GHG and climate change. Detailed construction and operational model outputs are presented in Attachment B to Appendix E.

**Table 9: Project Greenhouse Gas Emissions**

Emission Source	Emissions (metric tons/year)
	Total CO <sub>2</sub> E
Amortized Construction	15.63
Area	4.69E-04E-03
Energy	86.36
Mobile	949.92
Waste	43.69
Water	118.09
Total CO <sub>2</sub> E (all sources)	1,213.7
<b>Screening Threshold</b>	<b>3,000</b>
<b>Significant?</b>	<b>No</b>

#### **iv. Water Quality**

Grading and other construction activities associated with the project would have the potential to generate soil erosion and increase sediment loads in stormwater runoff resulting from exposed or disturbed soil. Additionally, spills, leakage, or improper handling and storage of substances such as oils, fuels, chemicals, metals, and other substances from vehicles, equipment, and



materials used during construction phases could also cause pollutants to be collected in stormwater runoff and impact water quality.

Because the project would result in disturbance of more than one acre, on-site construction activities would be subject to the National Pollutant Discharge Elimination System (NPDES) Statewide General Construction Activity Stormwater permit. For covered projects, the NPDES construction permit requires visual monitoring of stormwater and non-stormwater discharges; sampling, analysis, and monitoring of non-visible pollutants; and compliance with applicable water quality standards established for receiving waters potentially affected by construction discharges. Additionally, construction site operators would be responsible for preparing and implementing a Stormwater Pollution Prevention Plan (SWPPP) which outlines project-specific Best Management Practices (BMPs) to control erosion, sediment release, and otherwise reduce the potential for discharge of pollutants in stormwater. Implementation of construction BMPs would minimize surficial erosion and transport of pollutants, and provide compliance with applicable NPDES requirements, thereby protecting water quality both on- and off-site.

The project site is currently vacant and disturbed. The project would have a minor increase in the amount of impervious surfaces on-site with the warehouse building and paved parking and driveway areas. This increase in impervious surface area could generate additional stormwater and potentially impact water quality. The project will comply with all applicable stormwater and operational water quality regulations. Therefore, the operation of the project would not violate water quality standards or substantially degrade water quality.

Accordingly, the project will have no significant effects related to water quality.

#### **Criterion (e)**

*The site can be adequately served by all required utilities and public services.*

The project would be located in an existing urban area served by existing public utilities and services. As the project site is currently vacant, the proposed project would increase utility use over existing conditions. However, the City provides water, sewer, and solid waste collection

services to the surrounding uses in the area. Services to the project site were anticipated and planned for in the City's General Plan. Existing water lines, sewer lines, and electrical infrastructure already exist proximate to the project site. Therefore, the project site can be adequately served by all required utilities and public services.

## 4. Exceptions to the Class 32 Categorical Exemption

CEQA Guidelines Sections 15300.2(a) through (f) list specific exceptions that dictate when a Categorical Exemption may not be used. In the discussion below, each exception is followed by an explanation of why the exception does not apply to the project.

### **Exception (a): Location**

This exception only applies to Categorical Exemption Classes 3, 4, 5, 6, and 11, so it is inapplicable to the project.

**Exception (b): Cumulative Impact:** *All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*

As discussed in the individual sections above, the project would incrementally increase air pollution, GHG emissions, and motor vehicle trips on area roadways. However, there are no other industrial projects of the same time in the vicinity of the project site such that the project would result in cumulative impacts.

**Exception (c): Significant Effect Due to Unusual Circumstances.** *A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*

There are no unusual circumstances surrounding the project or the project site. Moreover, as supported by the technical studies attached as Appendices A-D, there is no reasonable possibility that the project will have a significant effect on the environment due to unusual circumstances.

**Exception (d): Scenic Highways.** *A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway.*

There is no state scenic highway in the vicinity of the project, so this exception does not apply.

**Exception (e): Hazardous Waste Sites.** *A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*

The site is not listed pursuant to Government Coded Section 65962.5, so this exception does not apply.

**Exception (f) Historical Resources.** *A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.*

The site is vacant and heavily disturbed. It does not contain any historical resources, so this exception does not apply.

## **5. Summary**

Based on this analysis, the proposed project meets all criteria for a Class 32 Categorical Exemption pursuant to CEQA Guidelines Section 15332. None of the exceptions to the Categorical Exemption listed in CEQA Guidelines Section 15300.2 apply to the proposed project.

## **6. References**

Appendix A – Biological CEQA Technical Memorandum prepared by ELMT Consulting

Appendix B – Trip Generation Assessment prepared by Urban Crossroads, Inc.

Appendix C – Vehicle Miles Traveled Screening Analysis prepared by Urban Crossroads, Inc.

Appendix D – Noise Impact Analysis prepared by Urban Crossroads, Inc.

Appendix E – Air Quality, Greenhouse Gas, and Health Risk Assessment prepared by Urban Crossroads, Inc.

## **Appendix A**

### **Biological CEQA Technical Memorandum prepared by ELMT Consulting**

## **Appendix B**

### **Trip Generation Assessment prepared by Urban Crossroads, Inc.**

## **Appendix C**

### **Vehicle Miles Traveled Screening Analysis prepared by Urban Crossroads, Inc.**

## **Appendix D**

### **Noise Impact Analysis prepared by Urban Crossroads, Inc.**

## **Appendix E**

### **Air Quality, Greenhouse Gas, and Health Risk Assessment prepared by Urban Crossroads, Inc.**