INITIAL STUDY
POMONA STABLES AND CORPORATE YARD PROJECT

Prepared for:

City of Pomona
Water Resources Department
148 North Huntington Street
Pomona, California 91768
Contact: Chris Diggs

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
BMP	best management practice
BTEX	benzene, toluene, ethylbenzene, and total xylenes
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CDFW	California Department of Fish and Wildlife
CDOC	California Department of Conservation
CEQA	California Environmental Quality Act
CGS	California Geologic Survey
COA	condition of approval
CY	cubic yards
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
GHG	greenhouse gas
GSP	Groundwater Sustainability Plan
IS	Initial Study
LID	Low Impact Development
MGP	manufactured gas plant
MLD	Most Likely Descendant
MM	mitigation measure
MND	mitigated negative declaration
MS4	Municipal Separate Storm Sewer System
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NOP	Notice of Preparation
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
PCE	primarily tetrachloroethylene
PRC	California Public Resources Code
SB	State Bill
SCAB	South Coast Air Basin
SCADA	Supervisory Control and Data Acquisition
SCAQMD	South Coast Air Quality Management District
SR	State Route
SUSMP	Standard Urban Storm Water Mitigation Plan
SWIRP	Solid Waste Integration Resources Plan
SWPPP	stormwater pollution prevention plan
TCE	trichloroethylene
TPH	total petroleum hydrocarbons
USFWS	U.S. Fish and Wildlife Service

Acronym/Abbreviation	Definition
VMT	vehicle miles traveled
WRD	Water Resources Department

1 Introduction

1.1 Project Overview

In 2017, an Initial Study/Mitigated Negative Declaration (2017 IS/MND) was prepared for the Pomona Corporate Yard Facility Project (originally proposed project) for the remediation of contamination associated with a former manufactured gas plant (MGP) followed by construction of a new, consolidated water and wastewater operations corporate yard facility on the site of the existing corporate yard facility, located at 148 North Huntington Street in the City of Pomona (project site). Since adoption of the 2017 IS/MND, remediation of the project site has been underway and the City of Pomona (City) has requested that the City of Pomona Stables (Pomona Stables), a historic resource located east of the project site, would be relocated and reconstructed onto the project site. The Pomona Stables and Corporate Yard Project (proposed project) involves completion of the Pomona Corporate Yard Facility improvements and the relocation and reconstruction of the Pomona Stables.

1.2 California Environmental Quality Act Compliance

This Initial Study (IS) has been prepared to identify and assess the anticipated environmental impacts of the proposed project.

This document has been prepared to satisfy the California Environmental Quality Act (CEQA) (California Public Resources Code, Section 21000 et seq.), and the CEQA Guidelines (14 CCR 15000 et seq.). CEQA requires that all state and local government agencies consider the environmental consequences of projects over which they have discretionary authority before acting on those projects.

1.3 Project Planning Setting

The proposed project is located within the City of Pomona (City). The City serves as the lead agency under CEQA for the proposed project. DTSC, which is responsible for the ongoing remediation activities at the project site, serves as a responsible agency, consistent with CEQA Guidelines Section 15096.

1.4 Public Review Process

The City of Pomona (City) has determined that an IS is the appropriate CEQA document for the proposed project. The IS, along with a Notice of Preparation (NOP) will be circulated for public review for a period of 30 days, pursuant to CEQA Guidelines Section 15073(a). The City will provide public notice at the beginning of the public scoping period.

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2 Initial Study Checklist

1. **Project title:**

   Pomona Stables and Corporate Yard Project

2. **Lead agency name and address:**

   City of Pomona – Water Resources Department
   148 North Huntington St.
   Pomona, California 91768
   909.802.7412

3. **Contact person and phone number:**

   Chris Diggs
   909.802.7412

4. **Project location:**

   The project site is generally located in the northwestern portion of the City of Pomona, within the eastern portion of Los Angeles County, as shown on Figure 2-1, Project Location. The L-shaped site, which consists of four parcels (APNs 8340-032-909, 8348-013-901, 8348-013-902, and 8348-013-903), is specifically located at 148 North Huntington Street and is bounded to the north by West Monterey Avenue and West Commercial Street, to the south by the Union Pacific Railroad tracks, to the west by North Hamilton Boulevard and North Huntington Street, and to the east by industrial uses fronting North White Avenue.

5. **Project sponsor's name and address:**

   City of Pomona
   Chris Diggs, Water Resources Director
   148 North Huntington Street
   Pomona, California 91768
   909.802.7412

6. **General plan designation:**

   The project site is designated as an Urban Neighborhood (Place Type) and T4-A (Transect Zone) (City of Pomona 2020).

7. **Zoning:**

   The Sewer Lot (APN 8348-013-903), which makes up the western portion of the site, is zoned Commercial Industrial; the Annex Lots (APNs 8348-013-901 and 8348-013-902) and the current Water and Public Works Yards (APN 8340-032-909), which makes up the eastern portion of the site, are zoned Publicly Owned Land (City of Pomona 2020).

8. Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):

8.1 Project Background

In June 2017, the MND for the Pomona Corporate Yard Facility Project (2017 IS/MND) was adopted, for the remediation and reconstruction of a new Corporate Yard Facility for the City of Pomona Water Resources Department (Department). Since adoption, some remediation at the project site has been completed, some buildings have been removed, and the City's Historic Advisory Commission and the City Council have asked the Department to redesign the project to relocate, rebuild, and reuse an existing Nationally Registered Historic Stables Structure. As such, this proposed project involves completion of the Pomona Corporate Yard Facility improvements and the relocation and reconstruction of the Pomona Stables. The originally proposed project included the following phases:

Phase 1 – Relocation of Annex Operations

To accommodate the cleanup activities associated with the former MGP at the project site, the first phase of the originally proposed project involved the relocation of operations within the Annex Lot to three different locations: the First Street Lot, the Water Yard Lot, and the Sewer Lot. These three sites would jointly house Annex Lot operations during the approximately 6-month remediation of the Annex Lot. No employees would report to the First Street Lot or Sewer Lot during interim operations; these sites would be used solely for storage of vehicles, materials, and equipment used on an as-needed and sporadic basis. All work activities would be performed on the existing Water Yard Lot, which is immediately east of and adjacent to the Annex Lot.

First Street Lot. At the First Street Lot, security fencing would be installed, temporary materials bins would be constructed, a temporary metal building to house workshops would be constructed, and a temporary parking lot would be created for vehicle and equipment storage. Vehicles and equipment stored at the First Street Lot would include pickup trucks, cement saws, a loader, a weld truck, a compressor, a crane, concrete mixers, saw trailers, sandblasters, a flushing truck, a cable spool trailer, riding mowers, trash pumps, and grass vacuums, among other vehicles. These vehicles and equipment would be used sparingly and accessed only as needed, which is anticipated to be less than weekly.

Water Yard Lot. Some of the vehicles currently located on the Annex Lot would be relocated to, and parked on, the Water Yard Lot. These would include pickup trucks, vans, trash pumps, compactors, pumps, generators, compressors, backhoes, a dump truck, and an emergency trailer, among other vehicles and types of equipment. These are similar in nature to existing vehicles and equipment already located on the Water Yard Lot.

Sewer Lot. On the Sewer Lot, which is located west of and immediately adjacent to the Annex Lot, remediation has been completed. During Phase 1 of construction, a parking lot would be constructed for interim use as vehicle and equipment storage. Vehicles and equipment stored at the Sewer Lot would include dump trucks, water trucks, pickup trucks, semitrailers, backhoes, message boards, a skip loader, sewer vacuum truck (e.g., Vactor), utility trucks, pipe materials and covers, and storage containers. The majority of these vehicles and equipment would be used sparingly and accessed only as needed, which is anticipated to be less than weekly; sewer vacuum trucks, however, are used on a daily basis. Ultimately, in the long term, upon completion of project construction, this site would be used for employee and customer parking.

Phase 2 – Remediation of Annex Lot

The California Department of Toxic Substances Control (DTSC) is conducting remediation activities that include the excavation, removal and hauling of approximately 10,000 cubic yards (CY) of contaminated soils. The major chemicals of potential concern for this site are carcinogenic polycyclic aromatic hydrocarbons (carcinogenic PAHs), polycyclic aromatic hydrocarbons (PAHs), total petroleum hydrocarbons (TPH), arsenic, lead, and volatile organic compounds (VOCs). Visual indications of lampblack, a by-product of the MGP operations, were previously observed during the investigative phase of work. Chemicals of potential concern found in lampblack are primarily PAHs. Other MGP residues may include metals, spent oxide, feedstock oil, and oil sludge. Spent oxide, used to purify the gas, may have residues containing cyanides. Feedstock oil and oil sludge from storage tanks or vaults may contain PAHs and aromatic compounds (benzene, toluene, ethylbenzene, and total xylenes (BTEX)).

Phase 3 – Annex Lot Construction

Upon completion of the remediation activities being undertaken by the SoCalGas on the Annex Lot, the City would construct a new two-story administration building, an employee support and training building, and new warehouse facilities.

Phase 4 – Relocation of Water Yard Operations

Upon completion of remediation activities and construction of the new facilities on the Annex portion of the project site, uses located on the Water Yard site, including warehouse space, administration and parking, would be relocated to the new facilities on the Annex site. During remediation of the Water Yard site, these relocated uses would occupy the Annex site, on a temporary interim basis. When remediation of the Water Yard portion of the project site is complete, new permanent facilities would be constructed.

Phase 5 – Remediation of Water Yard

The proposed excavation and backfilling operations of the Water Yard would occur after remediation of the Annex Lot.

Phase 6 – Water Yard Construction

Upon completion of the remediation activities on the Water Yard Lot, the City would construct new shop buildings, materials storage areas, and both covered and uncovered parking for vehicles and equipment.

Table 2-1 provides an overview of the approximate timeframe for each of the project phases.

Table 2-1. Phased Construction Timeline

Phase	Activity	Approximate Duration
1	Relocation of Annex Operations	COMPLETE
2	Remediation of Annex Lot	COMPLETE
3	Annex Lot Construction	12 – 24 months
4	Relocation of Water Yard Operations	6 months
5	Remediation of Water Yard	6 months
6	Water Yard Construction	5 months

8.2 Current Conditions at Project Site

Portions of the originally proposed project have been implemented. These include completion of Phase 1, which involved the relocation of the Annex Operations to the First Street Lot, the Water Yard Lot, and the Sewer Lot, and Phase 2, remediation at the Annex Lot. Table 2-2 summarizes which buildings currently exist on the project site.

Table 2-2. Existing Buildings

Building	Type	Use	Approx. Year Built	Approx. Square Footage
3	Office	Offices, lunchroom, and restroom	1930s	3,950
4	Warehouse	Offices, equipment, and material storage	1890s	7,600
5	Open Bay	Workshop and material storage	1955s	7,106
5-A	Auto	Workshop (dynamometer)	1960s	2,520
6	Restroom	Restroom, locker room	1940s	820
7	Trailer	Offices	2012	920
8	Enclosed	Workshop (welding)	1950s	640

8.3 Construction of Proposed Project

The proposed project would largely involve the continuation of the same phases associated with the originally approved project; however, there would be some modifications to account for the demolition and reconstruction of the Stables building on the project site. Therefore, this proposed project specifically involves the following phases:

- Phase 3 – Annex Lot Construction
- Phase 4 – Relocation of Water Yard Operations
- Phase 5 – Remediation of Water Yard
- Phase 6 – Water Yard Construction

Details for each of these phases is provided below.

Phase 3 – Annex Lot Construction

Remediation activities have been completed by SoCalGas under DTSC oversight on the Annex Lot. Under the currently proposed project, the City would construct a new single-story administration building, an employee support and training building, and new warehouse facilities in the same manner as previously envisioned in the originally proposed project. The full development is shown on Figure 2-2, Site Plan, and would consist of the facilities shown in Table 2-3. Additionally, conceptual overviews are shown in Figures 2-3a, 2-3b, and 2-3c.

Table 2-3. Annex Facilities

Building	Use	Approx. Square Footage
Administration	Administration, offices, janitorial, conference rooms, kitchen, restrooms	8,500
Employee Support and Training	Training room, storage, kitchen, restrooms, showers, locker rooms	4,000
Warehouse	Warehouse, receiving, water sample storage	7,428
Parking	Guest parking stalls (6), bicycle parking	N/A

N/A = not applicable.

Construction of Phase 3 would last between 12 and 24 months.

Phase 4 – Relocation of Water Yard Operations

The Annex portion of the project site has been remediated. Once Annex lot construction is complete, uses located on the Water Yard site, including warehouse space, administration and parking, would be relocated to the new facilities on the Annex site. During remediation of the Water Yard site, which is anticipated to last up to 6 months, these relocated uses would occupy the Annex site, on a temporary interim basis. When remediation of the Water Yard portion of the project site is complete, new permanent facilities would be constructed.

Phase 5 – Remediation of Water Yard

The proposed excavation and backfilling operations of the Water Yard are anticipated to take up to 6 months and will be completed under DTSC oversight. The remediation will occur after remediation of the Annex Lot. Remediation activities will last approximately 75 working days (100 calendar days); 60 of the 75 working days will be material hauling days, the remaining 15 days are for site demolition and restoration. Each truckload is estimated to have a haul capacity of 18 CY, and an average of 10 truckloads per day is estimated, with a maximum of 20 truckloads per day. Remediation activities of Water Yard will be approximately 75 working days (100 calendar days); 60 of the 75 working days will be material hauling days, and the remaining 15 days are for site demolition and restoration. Each truckload is estimated to have a haul capacity of 18 CY, and an average of 10 truckloads per day is estimated, with a maximum of 20 truckloads per day.

Phase 6 – Water Yard Construction

Upon completion of the remediation activities being undertaken by the SoCalGas with DTSC oversight on the Water Yard Lot, the City would demolish and reconstruct the existing Stables building in order to repurpose the building on the Water Yard portion of the project site. The existing historic Pomona Stables building would be relocated approximately 700 feet west of its current location and onto the project site. Ultimately, the Pomona Stables would be converted to an office building. Renovation and reconstruction would include removing and salvaging bricks, cupolas, ironworks and signages, to be reused in the reconstructed building at the project site. However, the reconstruction of the existing City Stables building would require new foundations, structural steel farming, mechanical system, plumbing, electrical systems, fire protection, tenant improvements, new site utilities, and associated sitework.

The reconstructed Stable Building is being designed for ground-up new construction. The completed building would visually represent a reconstruction of the dilapidated and collapsed historic Stable Building located on the eastern edge of the existing WRD campus.

The materials planned for use on the exterior of the Stable Building would come from the existing building and where the existing building materials are unavailable or damaged due to the current condition of the Stables, the materials would be intended to imitate the collapsed building, which is primarily a brick building with a gabled roof. The historic architectural drawings, related building design features, photos and dimensions will be used to help ensure the Stable Building design and reconstruction visually replicate the image and likeness of the original Stable Building, but will serve WRD's new functional uses.

The Stable Building would house the WRD's Public Entrance Lobby, a Reception Area, Meeting Rooms, Training Rooms, and a Kitchen/Breakroom. The Stable Building would link to the new Administration Building via a covered or enclosed corridor.

The interior of the Stable Building would utilize the voluminous two-story interior as a single story and not restore the second story hay loft. Interior finishes would include durable/simple concrete floors and gypsum wall board walls with some exposed wood framing as was originally designed.

Building materials planned for use on the Stable Building include steel reinforced cement block, structural steel members, brace-frames, use of the existing brick for the masonry and brick veneer, new doors and windows and an efficient electrical lighting and energy system which complies with current building codes. When completed the appearance of the new Stable Building may deviate slightly from the original Stable Building, but the intent is to capture the scale, mass, presence, and visual essence of the original building.

8.4 Operations

Once constructed, the proposed project would be developed with the rebuilt Pomona Stables building and associated Stable Building Plaza, an administration building, a Supervisory Control and Data Acquisition (SCADA) Tower, a warehouse building, a shaded area between the warehouse building and administration building, and an associated surface parking lot (See Figure 2-2, Site Plan)

Permanent operation of the newly constructed corporate yard facility would accommodate all of the Department, housing a total of approximately 65 to 75 employees, as is currently the case at the existing corporate yard facility. Typical hours of operation for the facility would be 6:30 a.m. to 5:00 p.m., Monday through Thursday. Select operations groups have one to two shifts with a handful of employees on site outside of these regular operating hours. Site access for employees and customers would be via Commercial Street, and Department vehicle access points would be located along Monterey Street east of Huntington Street as well as at the intersection of Commercial Street and Huntington Street. Site access and operations would be the same as current conditions at the existing corporate yard facility.

9. Surrounding land uses and setting (Briefly describe the project's surroundings):

Two of the three portions of the project site (Annex Lot and Sewer Lot) have been previously remediated and are currently undeveloped. Previously existing uses at the Annex Lot have been to relocated to three different locations: the First Street Lot, the Water Yard Lot, and the Sewer Lot. The Annex Lot has undergone remediation, and previously existing contaminated soils have been removed. Therefore, the Annex Lot is currently undeveloped. Approximately 75 City employees currently work at the project site. The project site

consists of four parcels, one of which (the Water Yard) is developed with warehouses and maintenance yards used by the City's Water Resources Department.

Zoning

The project site is zoned Commercial Industrial and Publicly Owned and is located immediately adjacent to, and outside of, the Downtown Specific Plan Area to the east. Zoning to the south and north of the project site is Commercial Industrial, and west of the site is Light Industrial. Immediately surrounding the site is also an R-2 Low Density Multi-Family Residential area (City of Pomona 2020). The southern edge of the project site abuts Union Pacific Railroad tracks used for freight rail services as well as commuter trains operated by Metrolink.

Existing development on the project site within the Water Yard consists of the elements summarized in Table 2-4. The Sewer Lot is currently undeveloped.

Sewer Lot

This site was formerly owned and operated by ARCO and used for fuel and oil storage and distribution (Geotrans 2002). The Sewer Lot site recently underwent remediation activities (City Project No. 575-70893) for the removal of VOCs, primarily tetrachloroethylene (PCE) and trichloroethylene (TCE) in the soil, soil vapor, and groundwater through soil vapor extraction. With soil vapor remediation complete, the site will be paved and can be used as a parking lot.

Annex Lot

The Annex Lot housed the former MGP. A review of historical records indicates that from 1887 until 1917, a coal gas and oil gas plant was operated at the MGP site by various utilities, including Pomona Gas and Electric Light Company, Pomona and Ontario Light and Fuel Company, Edison Electric Company, Southern California Edison Company, and Southern Counties Gas Company. Natural gas was available in Pomona in approximately 1917 and the MGP site was then converted to a natural gas storage and distribution facility. The site continued as a natural gas storage and distribution operation until 1955. Sanborn maps from 1911 indicate the plant was still operational, whereas a 1928 map shows that most of the plant structures had been removed and replaced by warehouses, an office, and an auto repair shed. Between 1917 and 1955, the MGP facility was operated by Southern Counties Gas Company (a predecessor of SoCalGas). Since 1955, the Department has used the MGP site as a corporate yard and operating base. Until recently, office buildings, warehouses, auto maintenance sheds, and parking lots were located on the previous MGP site. However, the Annex Lot has been recently remediated and approximately 10,000 cubic yards of contaminated soils have been exported from the Annex Lot, which is currently undeveloped.

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

City of Pomona – EIR Certification and Project Approval, Development Services and Public Works Departments and Historical Society

California Department of Toxic Substances Control – Site remediation

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

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

    The City will coordinate with tribes during the preparation of the Draft EIR.

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

Determination (To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

3/24/21
Date

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 Environmental Impact Report (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 measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
   a. The significance criteria or threshold, if any, used to evaluate each question; and
   b. The mitigation measure identified, if any, to reduce the impact to less than significance

3 Environmental Analysis

3.1 Aesthetics

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

a) Would the project have a substantial adverse effect on a scenic vista?

No impact. Under existing conditions, the project site is already developed with an existing City yard facility, and portions of the project site have been remediated to allow for development of the proposed project. In addition, the project site is surrounded by residential, commercial, and industrial development. More specifically, a mixture of residential properties, some vacant lots, and one undeveloped parcel filled with old cars and equipment are located north of the site. Immediately to the north and northeast, the City maintains a sanitation, refuse collection, and street maintenance facility and associated surface parking lots. The Southern Pacific Railroad right-of-way is located immediately south of the site. Farther south, numerous commercial businesses line Second Street. These include a pipe supply company, a furniture store, and automobile repair businesses. A vacant property, owned by the City Redevelopment Agency, is located immediately west of the site. No scenic vistas are present within the project site or in the surrounding area (City of Pomona 2014). Therefore, because no scenic vistas are present, and because the project site is already developed and surrounded by development on all sides, the project would not have a substantial adverse effect on a scenic vista. No impact would occur. This issue will not be further evaluated in the Draft EIR.

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

No impact. Scenic resources are physical features that provide scenic value to a project site and its surroundings. These typically include topographic, geologic, hydrologic, and biological resources (for example, hills, rock outcroppings, creeks, woodlands, or landmark trees). The project site is already developed, and is located in an urban area. No state scenic highways are located near the project site. The closest state-designated scenic highway to the site (State Route 2 (SR-2)) is located approximately 10.8 miles to the northwest of the site. The closest eligible state-scenic highway is State Route 142, located approximately 5.2 miles south of the project site (Caltrans 2020). Further, there are no scenic resources, including trees, rock outcroppings at the site. Although no historic buildings are present on-site, one historic building, the Pomona Stable, would be relocated to the project site with implementation of the proposed project.

Implementation of the proposed project would introduce new modern buildings on the existing corporate yard site. Project implementation would occur on the same developed corporate yard facility site and would not affect any scenic resources on-site, as none are present. Additionally, the site is not visible from a state scenic highway. Although one historic building, the Pomona Stable, would be relocated to the project site under the proposed project, the project is not located within the vicinity of a state scenic highway. Therefore, the project would not substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. No impacts would occur. This issue will not be further analyzed in the Draft EIR.

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

Less Than Significant Impact. The proposed project would be located in an urbanized area. Therefore, a significant impact may occur if a project would conflict with applicable zoning and other regulations governing scenic quality.

The Project site is zoned Commercial Industrial and Publicly Owned (City of Pomona 2020). The Commercial Industrial zoning allows for retail and wholesale sales, light manufacturing and warehouse distributing and storage, while Publicly Owned zoning allows for permanent open spaces and governmental facilities in the community (City of Pomona 2010). Therefore, the proposed project would be consistent with the zoning of the site. Further, in an effort to ensure that the proposed project would not result in any future adverse changes related to visual character and quality, and to ensure the proposed residential structures are visually compatible with surrounding land uses, the project would be designed in accordance with City's Municipal Code Section .223, which sets forth development standards for the Publicly Owned zoning as well as Section .393, which sets forth development standards for the Commercial Industrial zoning (City of Pomona 2019). In addition, the project would be subject to review by the zoning administrator to ensure that design of the proposed structures is consistent with all applicable design requirements, standards, and regulations set forth in the City's Municipal Code.

The City's General Plan identifies goals and policies guiding the aesthetic qualities of existing and future development in the City. The following objectives and policies applicable to the project include:

- **Goal 6F.P11:** Minimize the visual impact of industrial uses along the edges of industrial properties facing Reservoir Street and other streets that separate industrial development from residential uses. Employ measures such as:
  - Landscaped medians
  - Street trees
  - Continuous linear parks with pedestrian/bike paths
  - Parkway landscaping and berms adjacent to residential areas
  - Paring lots and storage areas for industrial and commercial uses along rail corridors or highways

- **Goal 6F.P19:** Require appropriate types of landscaping to soften the visual impact of workplace development and act as a buffer to adjacent neighborhoods.

- **Goal 7C.P20:** Explore opportunities for adaptive reuse of historic or existing structures for performing and visual arts venues, as exemplified by the recently restored Fox Theater.

- **Goal 7F.P6:** Provide visual interest and express the human scale in building design with:
  - Architectural building base treatments
  - Varied building colors, materials, and site landscaping treatments
  - Pedestrian-scale signage and ornamental lighting

The proposed project would include landscaping around the southeastern and northern boundaries to minimize visual impact of industrial uses, consistent with Goal GF.P11 and 6F.P19. In addition, the project would involve the adaptive reuse of the historic Pomona Stables structure, consistent with Goal 7C.P20. In addition, the proposed project would result in rebuilding a dilapidated structure, which would therefore improve the visual quality of the project site. Therefore, through consistency with existing zoning and the City's General Plan, the project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant. This issue will not be further analyzed in the Draft EIR.

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

Less Than Significant Impact. The existing lighting character of the project site and surrounding area is residential in nature, with the corporate yard facility including only necessary nighttime security lighting.

During construction activities, which would occur during the daytime hours, minimal nighttime lighting would be used on site. Nighttime lighting would be installed solely for site security purposes and would be directed onto the project site itself. The new corporate yard facilities, and use of these facilities, would be similar in visual character and amount of lighting to the existing facilities (e.g., administration buildings, parking lots, a warehouse). The project would be required to comply with City building and lighting requirements, including Section .339(m)(2) which requires that all lighting shall be shielded and confined within property lines. Compliance with existing regulations would ensure that impacts associated with light and glare from

potential new light sources associated with the proposed project would be less than significant. This issue will not be further evaluated in the Draft EIR.

3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

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

No Impact. The project site is located on land designated by the California Department of Conservation's Farmland Mapping and Monitoring Program as "Other Land" and does not include any prime farmland, unique farmland, or farmland of statewide importance (CDOC 2014). Further, the project site does not

include land subject to a Williamson Act contract (CDOC 2016). The project site is zoned Commercial Industrial and Publicly Owned Land (City of Pomona 2020) and is surrounded by industrial- and residential-zoned areas. Therefore, the proposed project would not conflict with the existing zoning for agricultural use or agricultural use of the land. The site is already developed, and does not support agricultural activities. No agricultural operations or forest land/timber resources are located in the immediate vicinity of the project site. As such, no impacts to agriculture, farmland, or forest land would occur. This issue will not be further evaluated in the Draft EIR.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. As discussed under 3.2(a) above, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract. This issue will not be further evaluated in the Draft EIR.

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

No Impact. As discussed under 3.2(a) above, the project would not conflict with existing zoning for forest land. This issue will not be further evaluated in the Draft EIR.

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

No Impact. As discussed under 3.2(a) above, the project would not conflict with existing zoning for forest land. This issue will not be further evaluated in the Draft EIR.

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. As discussed under 3.2(a) above, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract. This issue will not be further evaluated in the Draft EIR.

3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☒	☐	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact. The project site is located within the South Coast Air Basin (SCAB) and is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAB is a 6,745-square-mile area, which includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The SCAQMD administers the Air Quality Management Plan (AQMP) for the SCAB, which is a comprehensive document outlining an air pollution control program for attaining all California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The current adopted AQMP is the 2016 AQMP (SCAQMD 2017), which was adopted by the SCAQMD governing board on March 3, 2017.

The project would generate short-term, construction- and remediation-related and long-term operational air pollutant emissions that have the potential to affect local and regional air quality. Further evaluation in the Draft EIR would determine whether this project would conflict with SCAQMD's 2016 Air Quality Management Plan. These potential impacts will be analyzed further in the Draft EIR.

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

Potentially Significant Impact. The project would generate pollutant emissions during short-term construction and long-term operation and occupancy. An air quality analysis will be conducted to determine whether the mobile and stationary air pollutant emissions associated with the project would violate any air quality standard or contribute substantially to an existing or projected air quality violation. These potential impacts will be analyzed further in the Draft EIR. The project, along with several other developments planned or proposed near the project site, could cause a considerable cumulative net increase of a criteria pollutant for which the SCAB is in non-attainment. These potential impacts will be analyzed further in the Draft EIR.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. The site is a commercial/industrial property that is surrounded by commercial/industrial and residential properties. The nearest residences are located across the street from the site on Commercial Avenue and Huntington Street (approximately within 100 feet of the project

site). As such, there are sensitive receptors in the near vicinity of the project site that could be exposed to substantial pollutant concentrations. The air quality analysis will determine whether the potential mobile and stationary air emissions associated with the project could result in exposure of sensitive receptors to significant concentrations of air pollutants. These potential impacts will be analyzed further in the Draft EIR.

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

No Impact. Construction and remediation of the proposed project could result in objectionable odors from the emission of diesel fumes and other odors typically associated with construction activities. If located near sensitive receptors, construction odors could affect a substantial number of people. More specifically, odors would potentially be generated from vehicles and equipment exhaust emissions during remediation and construction of the project sites. Odors produced during construction or remediation would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment. Such odors are temporary and generally occur at magnitudes that would not affect substantial numbers of people.

Land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 2006). Although the project includes updating the City's wastewater operations, the wastewater operations under the proposed project would be similar to existing uses on the project site and would not increase the City's wastewater treatment capacity. The project would not introduce new sources of substantial odor during operations. Therefore, no odor impacts associated with the proposed project would occur. Odors will not be further addressed in the Draft EIR.

3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
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?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
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?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
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?	☐	☐	☐	☒

a) Would the project 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?

Less than Significant Impact. The project site is characterized as disturbed and developed with pavement and buildings and is surrounded by residential and commercial development as well as roadways and train tracks. The site consists of medium- and low-intensity light industrial development and does not include sensitive or natural land cover types (CDFW 2016a). The project site is surrounded by residential and commercial development as well as roadways and train tracks. The site is not located in or near any ecological reserves (CDFW 2016b).

A search of the California Natural Diversity Database, performed in the 2017 IS/MND revealed that no federally or state-listed animal or plant species have been observed on the project site. However, three California Species of Concern have been found in the vicinity of the project site. These include western yellow bat and big free-tailed bat, which have been identified within 1 mile of the project site, and western mastiff bat, which has been found in a non-specific area. The project site does not feature any rock outcrops, cliffs, or water features and it has a minimal number of trees. Thus, the site does not provide suitable roosting or foraging habitat for western yellow bat. Although big free-tailed bat and western mastiff bat are predominantly cliff-roosting species, both species can very occasionally roost in buildings. Remediation activities would include demolition of several buildings. Due to the potential of bats roosting in buildings in the area, proposed remediation activities could result in impacts to roosting bats. Mitigation measure (MM)-BIO-1, formerly included in the 2017 IS/MND, would be implemented in the design of the project as a condition of approval (COA) to ensure impacts to roosting bats would be less than significant. This COA has been included below as COA-BIO-1. Construction of the proposed project would commence upon completion of remediation activities. At the outset of construction, the site would be undeveloped and therefore would

not provide habitat for any species. Construction activities would be limited to the project site itself and therefore would not 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 California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). Upon completion of construction of the proposed project, the site would resume its use as the corporate yard facility. The office and light industrial uses of the project site would not be conducive to supporting wildlife and would not introduce any new features that could serve as habitat for species. As such, with implementation of COA-BIO-1, listed below, the project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species. Impacts would be less than significant. This issue will not be further evaluated in the Draft EIR.

COA-BIO-1 Due to the highly developed nature of the area and lack of suitable habitat at the project site, the proposed project is not expected to have an adverse effect (either direct or indirect) on any species identified as a candidate, sensitive, or special-status species or result in habitat modifications. Regardless, pre-demolition monitoring activities in the buildings on site will be conducted to identify any presence of the listed bat species. No more than 30 days prior to construction (including demolition work and tree trimming/removal activities), a qualified biologist will conduct a visual and acoustic pre-construction survey for roosting bats and/or sign (i.e., guano) within 300 feet of suitable bat roosting habitat (i.e., buildings and/or trees). A minimum of 1 day and 1 evening will be included in the visual pre-construction survey, which should concentrate on the period when roosting bats are most detectable (i.e., when leaving the roosts between 1 hour before sunset and 2 hours after sunset). If bats are not detected, no additional measures are required.

- If an active maternity roost is identified, the maternity roost will not be directly disturbed, and construction activities will maintain an appropriate distance (e.g., outside a 300-foot avoidance buffer) until the maternity roost is vacated and juveniles have fledged, as determined by a qualified biologist. The rearing season for native bat species in California is approximately March 1 through August 31.
- If non-breeding bat roosts (hibernacula or non-maternity roosts) are found, the individuals shall be safely evicted, under the direction of a qualified biologist, by opening the roosting area to allow airflow through the cavity or other means determined appropriate by a qualified biologist (e.g., installation of one-way doors). If flushing species from a tree roost is required, this shall be done when temperatures are sufficiently warm for bats to exit the roost, because bats do not typically leave their roost daily during winter months. In situations requiring one-way doors, a minimum of 1 week shall pass after doors are installed and temperatures should be sufficiently warm (for winter hibernacula) for bats to exit the roost. This action should allow all bats to leave during the course of 1 week. If a roost needs to be removed and a qualified biologist determines that the use of one-way doors is not necessary, the roost shall first be disturbed following the direction of the qualified biologist at dusk to allow bats to escape during the darker hours. Once the bats escape, the roost site shall be

removed or the construction disturbance shall occur the next day (i.e., there shall be no less or more than 1 night between initial disturbance and the roost removal).

This issue will not be further evaluated in the Draft EIR.

b) Would the project 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?

No Impact. As discussed above, the project site and its surroundings are largely developed. The project site is not located on or near any wetlands or riparian areas (USFWS 2020). No sensitive natural communities exist on the project site. Therefore, the proposed project would not result in an adverse effect on any riparian habitat or other sensitive natural community. No impacts would occur. This issue will not be further evaluated in the Draft EIR.

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

No Impact. As discussed above, the project site and its surroundings are largely developed. The project site is not located on or near any wetlands or riparian areas (USFWS 2016). Therefore, the proposed project would not result in an adverse effect on state or federally protected wetlands. No impacts would occur. This issue will not be further evaluated in the Draft EIR.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

No Impact. The project site is developed and paved, and is located within a large urban area. Therefore, there are no migratory pathways, corridors for fish or other wildlife species, wildlife nursery sites within the project site. Therefore, the project would not have a substantial adverse effect, either directly or through habitat modifications, on any native resident wildlife species or migratory wildlife corridors. No impact would occur. This issue will not be further evaluated in the Draft EIR.

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

No Impact The site is located within the City of Pomona on property owned by the City. There are no trees or other vegetation that would be removed during the remedial effort at the site. Therefore, remediation, construction, or operational activities associated with the project would not conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Furthermore, redevelopment of the project site would include landscaping that would include tree planting. No impacts resulting from conflict with any local policies or ordinances protecting biological resources would occur. This issue will not be further evaluated in the Draft EIR.

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

No Impact. The project site is not located within or near a habitat conservation plan or natural community conservation plan (CDFW 2015) or in a Los Angeles County designated Significant Ecological Area or Coastal Resource Area (County of Los Angeles 2015). Therefore, there would be no impact. This issue will not be further evaluated in the Draft EIR.

3.5 Cultural Resources

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

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

Potentially Significant Impact. As discussed in Section 8.3, above, the existing historic Pomona Stables building would be relocated approximately 700 feet west of its current location and onto the project site and would be converted to an office building. Renovation and reconstruction would include removing and salvaging bricks, cupolas, ironworks and signages, to be reused in the reconstructed building at the project site. The reconstruction of the existing City Stables building would require new foundations, structural steel farming, mechanical system, plumbing, electrical systems, fire protection, tenant improvements, new site utilities, and associated sitework. Due to alteration of this historic resource, the project could result in substantial adverse change in the significance of a historical resource pursuant to §15064.5. Therefore, impacts would be potentially significant, and this issue will be further analyzed in the Draft EIR.

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

Potentially Significant Impact. The project site has been previously disturbed. Therefore, the potential for encountering unknown subsurface archaeological resources is considered low. Nonetheless, as with any ground-disturbing activity, there is always the possibility of encountering unknown buried resources. Therefore, the project could cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 and impacts would be potentially significant. This issue will be further analyzed in the Draft EIR.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. The project site is not located within a known cemetery. Nonetheless, with any ground-disturbing activity there is always the possibility of discovering and adversely impacting unknown human remains on the site. However, as required for any project, a condition of approval will be applied to the project that states the following:

> In the event that human remains are encountered, State Health and Safety Code Section 7050.5 states that no further [ground] disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC.

With incorporation of this legally required condition of approval, impacts to human remains would be less than significant. This issue will not be further evaluated in the Draft EIR.

3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy – Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☒	☐	☐	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☒	☐	☐	☐

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

Potentially Significant Impact. Construction and operation of the proposed project would require the consumption of energy resources such as electricity, natural gas, and petroleum. The proposed project would create additional electricity and natural gas demand by adding construction equipment and workers to the project site. Because the number of employees under the project would be similar to existing conditions, it is not anticipated that operations of the project would result in a wasteful, inefficient, or unnecessary consumption of energy resources. Nonetheless, because the amount of energy anticipated to be used during construction and operation of the proposed project is not known at this time, the project could have a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be potentially significant, and this topic will be analyzed in the Draft EIR.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Potentially Significant Impact. The proposed project would be subject to and would comply with, at a minimum, the 2019 California Building Code Title 24 (24 CCR, Part 6). Though the proposed project would implement energy efficiency components, the Draft EIR will analyze whether it would conflict or obstruct applicable state or local plans related to renewable energy. Further analysis of this topic will be provided in the Draft EIR.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

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

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

ii) Strong seismic ground shaking?

Less Than Significant. The City lies in a seismically active region of Southern California, with several major active faults in the area, including the San Andreas, Sierra Madre, and Whittier–Elsinore Fault Zones. In addition to the regional faults, several local faults located within the City are considered potentially active, including the San Jose, Indian Hill, Chino, and Central Avenue Faults. These local faults do not have a high probability of seismic activity. However, of the local faults, the San Jose Fault presents the highest probability of earthquake activity, with possible ground rupture (City of Pomona 2014). The proposed project is located approximately 1 mile south of the San Jose Fault (CDOC 2015a). The site is not located in an Alquist-Priolo Earthquake Fault Zone (CDOC 2015b).

Ground shaking can occur with a single earthquake event. Although the entire City is susceptible to damage from ground shaking, geological conditions heavily influence the amount of shaking experienced. The majority of the City is underlain by alluvial soils, which are less resistant to shaking than other soil types. The City's General Plan includes a map showing areas of less movement and more movement with regard to ground shaking; the project site is located in an area where less ground shaking would occur (City of Pomona 2014). According to the California Department of Conservation map showing earthquake shaking potential for California, the project site and surrounding area is within an area classified as having a moderately high seismic risk in terms of earthquake shaking potential (CDOC 2016). Nonetheless, the project would be required to comply with General Plan policies that seek to ensure that new structures are built with consideration of the major hazards associated with earthquakes, and with the provisions of the California Building Code. In addition, as a condition of project approval, prior to issuance of grading, construction, or building permits, the City's Building Official and the City Engineer shall review and approve all geotechnical aspects of the project construction and grading plans to ensure compliance with the General Plan, California Building Code, and other local codes.

Upon completion of project construction, the new corporate yard facility would operate on the same site as the existing corporate yard facility. Use of the new buildings constructed on the site and parking vehicles on the project site would not alter or introduce any new potential for the project site and surrounding areas to be affected by earthquake fault rupture or increased ground shaking. As such, through compliance with

existing regulations during construction, impacts would be less than significant. This issue will not be further evaluated in the Draft EIR.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. The project site is not located within an identified liquefaction or landslide hazard area (City of Pomona 2014; County of Los Angeles 2020). In addition, as a condition of project approval, prior to issuance of grading, construction, or building permits, the City's Building Official and the City Engineer shall review and approve all geotechnical aspects of the project construction and grading plans to ensure compliance with the General Plan, California Building Code, and other local codes. Therefore, through compliance with all existing building codes, and because the project site is not located in a liquefaction zone, the proposed project would not increase the risk of seismic-related ground failure, including liquefaction. Impacts would be less than significant. This issue will not be further evaluated in the Draft EIR.

iv) Landslides?

Less Than Significant Impact. As discussed under threshold 3.7(a)(iii), above, the project site is not located within an identified liquefaction or landslide hazard area (City of Pomona 2014; County of Los Angeles 2020). Topographically, the site is located in an area that is relatively flat; therefore, slope stability and landslides are not a concern at the project site. In addition, the project would be constructed in compliance with the General Plan, California Building Code, and other local codes. In addition, prior to issuance of grading, construction, or building permits, the City's Building Official and the City Engineer shall review and approve all geotechnical aspects of the project construction and grading plans. Therefore, the proposed project would not increase the risk of landslides. Impacts would be less than significant. This issue will not be further evaluated in the Draft EIR.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact.

Construction

Upon completion of remediation activities by DTSC on the project site, the new buildings associated with the project would be constructed. During construction, there is the potential for erosion and sedimentation on and off the project site. However, the project must obtain a Grading Permit when earthwork is to be conducted, and a Construction General Permit that regulates stormwater runoff from construction sites 1 acre or greater in area. The Construction General Permit requires the development of a SWPPP by a certified Qualified SWPPP Developer. The SWPPP must identify potential sources of erosion or sedimentation that may be reasonably expected to affect the quality of stormwater discharges as well as identify and implement BMPs that ensure the reduction of these pollutants during stormwater discharges. The City's Best Management Practices for Construction Sites & Home Remodeling Projects pamphlet lists BMPs and other resources that shall be used to prevent dust emissions, soil erosion, and sedimentation during construction. Typical BMPs intended to control erosion include sandbags, detention basins, silt fencing, storm drain inlet protection, and street sweeping. With implementation of BMPs and other requirements of the City's Grading Ordinance, Construction General Permit, and the SWPPP, soil erosion is not anticipated during construction of the project.

Operation

Upon completion of project construction, once operational, the project site would be paved with limited potential for substantial soil erosion or the loss of topsoil. The flat site would be paved, used for buildings and the storage of vehicles, and would not have exposed topsoil that could experience erosion.

Conclusion

With implementation of BMPs, and requirements of the City's Grading Ordinance, Construction General Permit, and the SWPPP, the project would not result in substantial soil erosion or the loss of topsoil. Impacts during operation would be less than significant. This issue will not be further evaluated in the Draft EIR.

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

Less Than Significant Impact. Unstable geologic units or soils are characterized by materials lacking in sufficient integrity to support urban development (e.g., poorly consolidated fill). The project area supports existing light industrial, residential, and commercial development, which indicates that geologic conditions in the area are capable of supporting the proposed development. As discussed under threshold 3.7(a)(iii), above, the project site is not within an area identified as a liquefaction or landslide hazards (City of Pomona 2014; County of Los Angeles 2020). Further, per threshold 3.7(a)(iv), the project site is located in an area that is relatively flat; therefore, slope stability and landslides are not a concern at the project site. The remediation activities proposed at the site involve the removal of impacted soil. During the removal action, the excavation would be sloped, benched, and/or shored in accordance with City permit requirements as well as Occupational Safety and Health Administration (OSHA) requirements for excavations. After the removal action is complete, the site would be backfilled and compacted. A geotechnical engineer would oversee excavation, shoring, backfill, and compaction operations to ensure that the project does not create unstable soil that could result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, and/or collapse. Further, the proposed project would be required to comply with all existing building codes, including the General Plan, California Building Code, and other local codes, which would ensure that the project would not result in impacts related to unstable soils. Therefore, through compliance with existing regulations, the project would have less than significant impacts associated with unstable geologic units or soils. This issue will not be further evaluated in the Draft EIR.

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

Less Than Significant Impact. All soil remediation would be excavated under the supervision of a qualified geotechnical engineer. Once the rest of remediation of the project site is complete, the proposed project would be constructed on imported and compacted fill, which is not likely to have expansive soil potential. Lastly, the project would be constructed in compliance with the General Plan, California Building Code, and local codes, which would ensure no impacts related to expansive soils would occur. Impacts would be less than significant. This issue will not be further evaluated in the Draft EIR.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The project site already includes wastewater disposal systems for the existing operations facilities, and the proposed project would be required to maintain connection to the City's sanitary sewer system. The proposed project does not include the use of septic tanks. Therefore, no impact to soils relative to supporting use of septic tanks would occur. This issue will not be further evaluated in the Draft EIR.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. The project site has historically been disturbed and the proposed removal actions at the site would not be expected to destroy any paleontological resources or alter any unique geologic features not previously disturbed.

However, there is the possibility of discovering and adversely affecting unknown paleontological or unique geologic features with ground-disturbing activity. The following standard procedure, incorporated as a condition of project approval, would be implemented to minimize potential impacts to unknown paleontological resources during earthwork:

- In the event that paleontological resources (sites, features, or artifacts) are exposed during construction activities for the proposed project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified paleontologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find under CEQA (14 CCR 15064.5(f); PRC Section 21082), the archaeologist or paleontologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological or paleontological treatment plan, testing, or data recovery may be warranted.

Incorporation of this procedure into the proposed project would reduce potentially significant effects on paleontological resources to a less than significant level. This issue will not be further evaluated in the Draft EIR.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

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

Potentially Significant Impact. Project development could have the potential to result in greenhouse gas (GHG) emissions related to construction and remediation activities, vehicle trips, use of the proposed buildings, and other associated uses. Operational emissions would be generated from daily traffic trips associated with on-site building uses, electricity and natural gas use, solid waste, and water supply and wastewater treatment. A GHG analysis will be prepared to quantify GHG emissions and determine whether the project would result in a substantial contribution of GHG emissions that could impact the environment. This subject will be further addressed in the Draft EIR.

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

Potentially Significant Impact. The City has adopted the City of Pomona Green Plan as a reference document that directs growth in a manner that minimizes waste and energy consumption, optimizes existing systems and programs, and outlines a path for the City to reduce GHG emissions to 15% below baseline levels by 2020 to achieve the goals of AB 32 (City of Pomona 2012). The proposed project would be developed to support the policy objectives of the City of Pomona Green Plan.

A GHG analysis will be prepared to analyze whether or not GHG emissions generated by the proposed project would be consistent with GHG policies such as the ones included in the General Plan and City of Pomona Green Plan. This topic will be further addressed in the Draft EIR.

3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐

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

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

Construction

Less Than Significant Impact. Upon completion of remediation activities at the project site, construction of the new corporate yard facilities would be completed. Construction of commercial and publicly owned land uses on the project site would require the use and storage of equipment that could result in the transport, use, or disposal of hazardous materials. During construction, the operation and maintenance of equipment would involve the limited use and handling of hazardous materials, including diesel fuel, gasoline, lubricants, and solvents. Any hazardous materials would be used and stored within the area designated for the construction site. Diesel fuel would be used to power the equipment and would be present in the fuel tanks of the individual pieces of equipment and potentially in larger quantity storage tanks used to refuel the equipment. Small quantities of lubricants and solvents may be stored in the support area for maintenance of construction equipment. The project would not require storage or use of any large volumes of flammable and/or hazardous materials during construction. The quantities of hazardous materials would be in accordance with federal, state, or local regulations to minimize the potential for release of hazardous

materials into the environment. Therefore, the use and presence is not anticipated to cause a significant hazard to the public or environment. Impacts during construction would be less than significant. This issue will not be further evaluated in the Draft EIR.

Operation

Less Than Significant Impact. Upon completion of project construction, the project site would resume its use as a corporate yard facility. Operation activities at the project site would be comparable to operations of the existing facility and would not introduce new hazards. Impacts would be less than significant. This issue will not be further evaluated in the Draft EIR.

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

Potentially Significant. The proposed project would result in remediation of the existing Water Yard, which would remediate the contaminated soils on site such that the potential for upset and accident conditions involving the release of hazardous materials into the environment would be reduced. Nonetheless, during remediation activities, the proposed project could potentially result in an upset and accident condition, including spill of hazardous, contaminated soils. As discussed above, construction of the proposed project would not require storage or use of any large volumes of flammable and/or hazardous materials during construction. The quantities of hazardous materials would be in accordance with federal, state, or local regulations to minimize the potential for release of hazardous materials into the environment. During operations, the proposed project would resume its use as a corporate yard facility. Operation activities at the project site would be comparable to operations of the existing facility and would not introduce new hazards. Although hazardous materials would be used, stored, disposed of, and transported in accordance with applicable federal, state, and local regulations, impacts would be potentially significant and this issue will be further discussed in the Draft EIR.

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

Less than Significant. Two schools are located within one quarter mile of the project site. This includes Lopez Elementary School, located at 701 South White Avenue, approximately 0.20 miles south of the site, and Pomona Catholic High School, located at 533 W Holt Avenue, approximately 0.24 miles north of the site. As discussed under thresholds 3.9(a) and 3.9(b), above, remediation of Water Yard would result in transport, use, or disposal of contaminated soils which could emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. During transportation of excavated soils, the trucks would be covered to minimize soil dispersion during transport, and decontamination procedures would be followed during truck loading to prevent transfer of contamination off site. The haul route for remediation activities, to be used for the transport of soils for off-site disposal/treatment would involve the most direct route to SR-71, while limiting (to the extent possible) travel through residential neighborhoods and by schools. Therefore, the proposed remediation activities would not create a significant hazard to the public or the environment through the transport of hazardous materials. In addition, the proposed project is not expected to handle or emit large quantities of hazardous materials during construction and operations. Additionally, activities and equipment stored on the project site would be similar in nature to the existing activities and equipment on

site, and would not introduce new hazards to the project surroundings. As such, impacts would be less than significant. This issue will not be further discussed in the EIR.

d) Would the project be located on a site that 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?

Potentially Significant. California Government Code Section 65962.5 requires that information regarding environmental impacts of hazardous substances and wastes be maintained and provided at least annually to the Secretary for Environmental Protection. Commonly referred to as the Cortese List, this information must include the following: sites impacted by hazardous wastes, public drinking water wells that contain detectable levels of contamination, underground storage tanks with unauthorized releases, solid waste disposal facilities from which there is migration of hazardous wastes, and all cease and desist and cleanup and abatement orders.

The site is listed twice on EnviroStor, DTSC's online listing of hazardous materials sites (DTSC 2016). These listings include "So Cal Gas/Pomona MGP," located at Commercial Avenue and Huntington Street in Pomona, California 91766, and "Pomona Corporate Yard," located at 148 North Huntington Street, Pomona, California 91768. For both listings, the site type is "Voluntary Cleanup," and the status is "Inactive – Action Required." One of the listings, located at 148 North Huntington Street, within Annex Yard, is currently being remediated as part of the originally proposed project. Remediation of Water Yard would remove/remediate chemicals of concern to below actionable concentrations, so they pose a negligible risk to human health or the environment. However, to ensure that remediation activities would not create a significant hazard to the public or the environment, and that no additional hazardous sites have been listed at or in the vicinity of the project site since the 2017 IS/MND, this issue will be further discussed in the Draft EIR.

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

Less Than Significant Impact. The proposed project is located within the geographic scope of the Brackett Field Airport Land Use Compatibility Plan, and located approximately two miles southeast of the Brackett Field Airport. In addition, the project site is located within the Airport Influence Area of the LA/Ontario International Airport (City of Ontario 2011). However, construction and operations of the proposed project would be similar in nature to the existing uses on the project site (Mead & Hunt 2015). The proposed project would not request changes to zoning ordinances, construct buildings with a height that requires review by the Federal Aviation Administration, introduce new electrical or visual hazards to aircraft flight, or have the potential to cause an increase in the attractions of birds or other wildlife that could be hazardous to aircraft operations in the vicinity of the airport. Upon completion of construction, operational activities at the project site would be the same as existing conditions. As such, construction and operational impacts would be less than significant. This issue will not be further discussed in the Draft EIR.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. The City adopted a Natural Hazards Mitigation Plan in 2004 to address natural hazards and risks, including flooding. The City also operates a Standardized Emergency Management

System Plan, adopted in 1999, to establish emergency coordination, policies, and procedures (City of Pomona 2014). Lastly, the City has an Emergency Operations Plan dated April 18, 2011 (City of Pomona 2011). The haul route for remediation activities, to be used for the transport of soils for off-site disposal/ treatment would involve the most direct route to State Route 71, while limiting (to the extent possible) travel through residential neighborhoods and by schools. Access for emergency vehicles and traffic in the project vicinity would be maintained at all times throughout construction, and would not interfere with these plans. Any temporary detours or traffic delays associated with the project would result in a less than significant impact associated with impairment of the implementation of emergency response and evacuation plans. During operation, corporate yard facility activities would be the same as existing conditions. As such, project construction and operation would not result in impacts to an adopted emergency response or evacuation plan, and impacts would be less than significant. This issue will not be further discussed in the Draft EIR.

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

No Impact. The project is located in a developed urban area. The project site is not located in an area designated by the California Department of Forestry and Fire Protection (CAL FIRE) as a very high, high, or moderate fire severity zone (CAL FIRE 2020). Therefore, the project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. No impact would occur. This issue will not be further discussed in the Draft EIR.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on or off site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. During construction, the project must obtain a Construction General Permit that regulates stormwater runoff from construction sites one acre or greater. The Construction General Permit requires the development of a stormwater pollution prevention plan (SWPPP) by a certified Qualified SWPPP Developer. The SWPPP must identify potential sources of erosion or sedimentation that may be reasonably expected to affect the quality of stormwater discharges as well as identify and implement BMPs that ensure the reduction of these pollutants during stormwater discharges. Implementation of BMPs and applicable local code requirements for erosion control would ensure that project construction activities would not violate any water quality standards or waste discharge requirements and that no significant impacts associated with violation of water quality standards would result from construction of the proposed project.

Operations of the proposed project would be similar to existing operations on the project site and would not violate any water quality standards or water discharge requirements. Impacts during construction and operations would be less than significant. This issue will not be further discussed in the Draft EIR.

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

Less than Significant Impact. The project site is located within the San Gabriel Valley Groundwater Basin (Department of Water Resources 2020a). However, construction of the proposed project would not involve groundwater extraction or recharge that would produce any effect on the local groundwater supply or groundwater table. Operations of the proposed project would be similar to existing operations on the project site. The project would not involve groundwater extraction or affect recharge that would produce any effect on the local groundwater supply or groundwater table. Impacts would be less than significant. This issue will not be further discussed in the Draft EIR.

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

i) result in substantial erosion or siltation on or off site; and

ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site; and

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

iv) impede or redirect flood flows?

Less Than Significant Impact. The project site is mostly developed and paved and is generally on level ground. Remediation of the site would occur prior to construction of the new corporate yard facility and has been previously analyzed in the 2017 IS/MND. Because the site is already paved, repaving and constructing new structures at the site would not substantially alter the existing drainage pattern of the site. Additionally, there are no rivers or streams on or near the project site. Construction of the proposed project would result in ground surface disruption during grading and excavation, temporarily altering the drainage pattern of the project site during construction, which could result in erosion, siltation, or flooding impacts. However, BMPs would be implemented during construction to minimize impacts related to runoff and erosion. Typical BMPs intended to control erosion include sandbags, detention basins, silt fencing, storm drain inlet protection, and street sweeping. Implementation of these BMPs would minimize the amount of erosion and/or siltation that would have the potential to occur during construction.

In addition, the project would be required to comply with the City's Low Impact Development (LID) ordinance and the Los Angeles County Municipal Separate Storm Sewer System (MS4) permit, which requires capture and treatment of the 85th percentile, 24-hour storm event. As part of the project's final design review, the project would be required to submit a Standard Urban Storm Water Mitigation Plan (SUSMP) demonstrating adequate stormwater retention using infiltration basins, bioretention areas, capture and controlled release tanks, or another BMP (City of Pomona 2016). These BMPs would slow the velocity of water and allow sediment and debris to settle out of the water column, thereby minimizing the potential for downstream flooding, erosion/siltation, or exceedances of stormwater drainage system capacity.

Operations of the proposed project would be similar in nature to existing operations at the site and would not introduce substantially different drainage patterns or runoff. During operations, the project site would be covered with buildings, hardscape, and landscaping, which would preclude on-site erosion and siltation. The project site is already developed and includes an existing stormwater drainage system. Operations of the proposed facilities would be similar to existing conditions and would not create or contribute to runoff that would exceed the existing drainage systems. Therefore, the existing storm drain infrastructure in the vicinity of the site would be adequate for construction and operations of the proposed project. Any potential impacts such as erosion or siltation, flooding, and redirection of flood flows would be minimal.

Therefore, with implementation of BMPs to capture and retain stormwater, the project would not substantially alter the existing drainage pattern of the site or area. Impacts such as erosion or siltation, flooding, exceedance in the capacity of existing or planned stormwater drainage systems, or introduction

substantial additional sources of polluted runoff would be less than significant during construction and operations. This issue will not be further discussed in the Draft EIR.

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

No Impact. The project site is not located in a 100-year floodplain as designated by the Federal Emergency Management Agency (FEMA) (FEMA 2008). Therefore, it is unlikely that inundation of the site would occur in response to a storm event. Therefore, construction or operation of the project would not result in the risk the release pollutants due to inundation from a flood hazard.

The project site is approximately 41 miles from the Pacific Ocean and not subject to tsunami. According to Figure 7-G.6 of the City's General Plan, the project site is not located in the inundation zone for either the San Antonio Dam or Live Oak Reservoir (City of Pomona 2014). Therefore, the project is not located in a flood hazard, tsunami, or seiche zone where project inundation could result in the release of pollutants. No impact would occur. This issue will not be further discussed in the Draft EIR.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. The project site is located within the San Gabriel Valley Groundwater Basin (Department of Water Resources 2020a). The San Gabriel Valley Groundwater Basin is not a critically over drafted basin and has an option to develop a Groundwater Sustainability Plan (GSP) (Department of Water Resources 2020b). However, as discussed under threshold 3.10(b), above, the project would not involve groundwater extraction or affect recharge that would produce any effect on the local groundwater supply or groundwater table. In addition, as discussed under threshold 3.10(a), above, during construction, the project must obtain a Construction General Permit that regulates stormwater runoff from construction sites one acre or greater. The Construction General Permit requires the development of a SWPPP by a certified Qualified SWPPP Developer. Implementation of BMPs and applicable local code requirements for erosion control would ensure that project construction activities would not violate any water quality standards or waste discharge requirements and that no significant impacts associated with violation of water quality standards would result from construction of the proposed project. Operations of the proposed project would be similar to existing operations on the project site and would not violate any water quality standards or water discharge requirements. Therefore, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. No impacts would occur. This issue will not be further discussed in the Draft EIR.

3.11 Land Use and Planning

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

a) Would the project physically divide an established community?

No Impact. The project would consist of improvements and construction on an already developed and disturbed project site that is zoned Commercial Industrial and Publicly Owned Land (City of Pomona 2020). The surrounding area is also developed with industrial, commercial, and residential uses. The project would not entail any new roadways or other features that would physically divide the existing community and would limit development to the existing site boundaries. Therefore, no impact would occur. This issue will not be further discussed in the Draft EIR.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. The project site that is zoned Commercial Industrial and Publicly Owned Land (City of Pomona 2020). Further, the project site is designated as an Urban Neighborhood in the City's General Plan and is already developed (City of Pomona 2020). The project site is already developed with existing City yard facility and portions of the project site have been remediated to allow for development of the proposed project. Therefore, the project would be consistent with the existing land use and zoning of the project site and would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project. No impact would occur. This issue will not be further discussed in the Draft EIR.

3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. 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?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; and

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. The project site is designated as an Urban Neighborhood in the City's General Plan and is already developed (City of Pomona 2020). The site is not identified in the City's General Plan as a site containing locally important mineral resources that would be of local, regional, or statewide importance (City of Pomona 2014).

The State Mining and Geology Board uses a classification system that divides land into four Mineral Resource Zones based on quantity and significance of mineral resources. The project site is designated as an urban area in the California Geologic Survey (CGS) (CGS 2007). Therefore, there are no known mineral resources in the area that would be of value to the region. Further, the site is already developed with an existing City yard and previously remediated areas and surrounded by commercial/industrial and residential development. Therefore, the site does not contain any known mineral deposits or active mineral extraction operation and the project does not propose to excavate the site for mineral resources. Construction and operations of the proposed project would not remove or affect any known mineral resources. Therefore, no impact to known mineral resources would occur with project implementation. This issue will not be further discussed in the Draft EIR.

3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE – Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

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

Potentially Significant Impact. Construction noise and vibration are temporary phenomena. Construction noise and vibration levels vary from hour to hour and day to day, depending on the equipment in use, the operations being performed, and the distance between the source and receptor. A noise study would be prepared to assess potential impacts during construction and operations to noise-sensitive land uses, including the residences located in the vicinity of the project site. Potential short-term construction noise impacts on nearby noise-sensitive land uses will be evaluated based on revised construction phasing and equipment data to be provided by the project applicant and noise modeling methods developed by the Federal Highway Administration (FHWA). The significance of noise/vibration impacts will be assessed based on the relevant City of Pomona noise standards. Further evaluation in the Draft EIR would determine whether this project would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. These potential impacts will be analyzed further in the Draft EIR.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Construction activities that might expose persons to excessive ground-borne vibration or ground-borne noise could cause a potentially significant impact. As discussed under threshold 3.13(a), above, a noise study would be prepared to assess potential impacts during construction and operations to noise-sensitive land uses, including the residences located in the vicinity of the project site. The significance of noise and vibration impacts will be assessed based on the relevant City noise standards.

Once the project is operational, the same operations and activities that currently occur would continue under the proposed project. The project would not result in an increase in capacity. Therefore, vibration levels associated with the proposed project would not increase, and impacts associated with project operations would be less than significant. Nonetheless, because the project could result in excessive groundborne vibration or groundborne noise levels during construction, impacts would be potentially significant. Potential impacts will be analyzed further in the Draft EIR.

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

Less Than Significant Impact. The project site is located within the Airport Influence Area of the LA/Ontario International Airport. However, the project site is located approximately 2.4 miles outside of the LA/Ontario International Airport's 60 dBA community noise equivalent level noise contour (City of Ontario 2011). In addition, the project is located approximately two miles southeast of the Brackett Field Airport. However, the project site is not located within the community noise equivalent level noise contour of Bracket Field Airport. Therefore, the project would not expose people working or residing in the project area to excessive noise levels from airports or aircraft. The project site is not located within the vicinity of a private airstrip. Impacts associated with project implementation would be less than significant. This issue will not be further discussed in the Draft EIR.

3.14 Population and Housing

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

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

No Impact. The site is currently zoned Commercial Industrial and Publicly Owned Land (City of Pomona 2020). Project implementation would result in demolition, site remediation, and construction and operation of a new corporate yard facility on the same site as the existing corporate yard facility. No residential development would occur. The City's wastewater operations under the proposed project would be similar to existing uses on the project site. Reconstructing the wastewater operations facilities would not induce growth either directly or indirectly. Updating the City's wastewater operations facilities would not increase the City's wastewater treatment capacity and would therefore not lead to growth by allowing additional wastewater treatment. The proposed project would not introduce more employees than the existing operations at the project site. Short-term construction workers would be required during the construction phases; however, they are expected to be drawn from the existing workforce and would not necessitate the relocation of new workers to the area. Therefore, no impact associated with inducing population growth would occur. This issue will not be further discussed in the Draft EIR.

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

No Impact. The proposed project would occur on land currently occupied by the existing corporate yard facility and is zoned Commercial Industrial and Publicly Owned Land (City of Pomona 2020). No residences are located on site and the project would not require the acquisition of any new land or the displacement of residents; as such, no impact would occur. This issue will not be further discussed in the Draft EIR.

3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES				
a) 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:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

a) 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:

Fire protection, Police protection, Schools, Parks, or Other public facilities?

Less Than Significant Impact. The project site is already developed with an existing corporate yard facility, and is located within an area developed with residential and commercial uses. Currently the area is fully serviced for all major public services, including fire protection, policing, transportation, medical and emergency response, and others.

Construction of the project would be confined to the existing boundaries of the project site. Construction activities themselves would not result in an increase in fire or police protection services when compared to existing conditions, and the demand for schools, parks, and other public services would not be affected by construction activities on the project site. Operation of the proposed project would be similar in nature to existing operations of the corporate yard facility, and the project would not result in increased employment or residential population growth. The need for new or altered governmental facilities, schools, or parks is generally associated with growth. Given that the project would not induce growth, impacts to and demand for public services would be less than significant. This issue will not be further discussed in the Draft EIR.

3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

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

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

No Impact. The site is currently zoned Commercial Industrial and Publicly Owned Land (City of Pomona 2020). No recreational facilities are located on the project site, and no recreational facilities are included as part of the proposed project. Because the proposed project does not include residential development, it would not result in an increase in population such that increased demand for recreational facilities would occur. As such, no impacts to recreational facilities would occur. This issue will not be further discussed in the Draft EIR.

3.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION – Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

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

Less Than Significant Impact.

Pomona's General Plan Update 2014 includes plans and polices addressing the circulation system within its Mobility and Access Component. Holt Avenue and White Avenue are important Arterial streets and Hamilton Boulevard is a Collector street in the vicinity of the proposed project. Local access to the proposed project is via West Commercial Street, a local street per City's street classification system. Since the proposed project would reconstruct existing facilities, it would not add any new vehicular traffic to the intersections and roadways in its vicinity. The proposed project would consist of improvements and construction on an already developed site in an industrial area. Upon completion of construction, operations at the project site would be like those under existing conditions. The project would not alter the roadway system around the site nor preclude the City from implementing any program, plan or policy addressing the circulation system.

The Active Transportation Plan (November 2012) includes Bicycle Master Plan and Pedestrian Master Plan for the City of Pomona. The Bicycle Master Plan proposes bike lane along Hamilton Boulevard and bike route along Monterey Avenue, 2nd Street and Park Avenue in the vicinity of the proposed project. The project is located within a census tract with a high walking activity index per Pedestrian Master Plan and there no specific pedestrian improvements proposed in its immediate vicinity. The are existing sidewalks along the project frontage which would be maintained and improved per City standards during the reconstruction of the project.

Foothill Transit, Omnitrans and Los Angeles County Metropolitan Transportation Authority provide bus service in the City of Pomona, The nearest bus stop is located near the Hamilton Boulevard/Holt Avenue intersection, approximately 0.3 miles north of the proposed project. The City is also served with Metrolink and Amtrak service. Pomona Transit Station is located approximately 0.8 miles east of the proposed project. Therefore, the project is well-served by transit and would not conflict with any plans or policies addressing transit facilities.

As shown above, the proposed project's impacts to a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities would be less than significant. This issue will not be further discussed in the Draft EIR.

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

Less Than Significant Impact. Section 15064.3 of the CEQA Guidelines details new regulations, effective statewide July 1, 2020, that set specific considerations for evaluating a project's transportation impacts. Generally, VMT is the most appropriate measure of transportation impacts. VMT refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and nonmotorized travel. Except as provided regarding roadway capacity, a project's effect on automobile delay does not constitute a significant environmental impact. Per State Bill (SB) 743, VMT analysis for projects was required to start July 2020.

Permanent operation of the newly constructed Pomona Stables and Corporate yard facility would replace the existing stable and corporate yard facilities. It would accommodate all the existing 65 to 75 employees of the Department. The proposed project would not add any new employees and therefore would not generate new trips or VMT compared to the existing conditions.

Construction of the project would generate temporary worker and truck trips which would cease once construction is complete. Therefore, construction related VMT would be temporary and short term. Further, it should be noted that Governor's Office of Planning and Research (OPR) and State guidance for estimating VMT, does not require quantitative assessment of temporary construction traffic.

Therefore, the construction and operation of the proposed project would not conflict or be inconsistent with CEQA Guidelines Sections 15064.3(b)(1) and 15064.3(b)(3), and impacts would be less than significant. This issue will not be further discussed in the Draft EIR.

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

Less than Significant Impact. Construction-related equipment and vehicles would be of similar nature to vehicles and equipment currently stored on the project site. Therefore, construction of the proposed project would not include any incompatible uses. Construction would not alter the adjacent roadways or intersections, and thus would not increase hazards due to changes in design features.

The proposed project does not include development of new roads or intersections. Upon completion of construction, the design and layout of the proposed project would be similar to the existing design of the project facilities. Access to the site would be provided off of West Commercial Street, to the north of the site, and would be similar to the existing facilities on site. Vehicles and equipment that would be located on the proposed facilities would also be similar to existing vehicles and equipment on site. Impacts would be less than significant. This issue will not be further discussed in the Draft EIR.

d) Would the project result in inadequate emergency access?

Less than Significant Impact. Construction of the proposed project would introduce a limited amount of construction-related vehicles and equipment that would be stored on site, away from ingress/egress access points on the project site. Emergency access would be maintained on all roads throughout construction. Operation of the proposed project would be of similar nature to the existing project facilities, with similar daily vehicles and similar ingress and egress points. Construction and operations would have less than significant impacts on emergency access. This issue will not be further discussed in the Draft EIR.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☒	☐	☐	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☒	☐	☐	☐

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

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

Potentially Significant Impact. The City will consult with local tribes in accordance with Assembly Bill (AB) 52 and the Draft EIR will include a detailed timeline of the consultation process. The City must provide notice to tribes that are affiliated with the geographic area of the project site, if the tribe has submitted a written request to be notified. The project site is already disturbed and has been remediated under the originally proposed project. Therefore, the potential to uncover tribal cultural resources is low. Nonetheless, although low, the potential exists to uncover tribal cultural resources is still present on-site. The findings of the cultural resources report that will be completed for the project, as they may relate to local tribes and tribal resources, will be summarized in the Draft EIR to evaluate potential direct and indirect impacts on tribal cultural resources. The results of the consultation process will also be summarized into the Draft EIR to evaluate direct and indirect impacts on tribal cultural resources. These potential impacts will be analyzed further in the Draft EIR.

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

Potentially Significant Impact. See response to threshold 3.18(a)(i) above. The findings of the cultural resources report and the results of the AB 52 consultation process will evaluate potential impacts to significant tribal cultural resources. These potential impacts will be analyzed further in the Draft EIR.

3.19 Utilities and Service Systems

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

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

Less than Significant Impact.

Wastewater

Wastewater volumes generated during remediation or construction activities would be minimal to none. Upon completion of construction, operation of the proposed project would be similar to operation of the existing corporate yard facility. As with existing conditions, the proposed project would also include approximately 75 employees. Thus, the proposed project would not increase the capacity of the City's wastewater treatment plant or exceed wastewater treatment requirements, and because the same number of employees would work at the facility, no additional treatment capacity is necessary. As such, impacts associated with exceeding wastewater treatment requirements would be less than significant. This issue will not be further evaluated in the Draft EIR.

Water

As described previously, upon completion of remediation and construction, the proposed project would implement a new corporate yard facility that would operates comparably to the existing corporate yard facility at the project site. The project site is currently served by existing water infrastructure, and this would remain unchanged with project implementation. Because the project would not result in any new, more intense operations and would not result in an increase in the number of people on the site, there would be no need for new or expanded water treatment facilities. As such, impacts associated with water and wastewater infrastructure and treatment facilities would be less than significant. This issue will not be further evaluated in the Draft EIR.

Stormwater Drainage

As discussed under threshold 3.10 (c), above, In addition, the project would be required to comply with the City's LID ordinance and the Los Angeles County MS4 permit, which requires capture and treatment of the 85th percentile, 24-hour storm event. As part of the project's final design review, the project would be required to submit a SUSMP demonstrating adequate stormwater retention using infiltration basins, bioretention areas, capture and controlled release tanks, or another BMP (City of Pomona 2016). These BMPs would slow the velocity of water and allow sediment and debris to settle out of the water column, thereby minimizing the potential for downstream flooding, erosion/siltation, or exceedances of stormwater drainage system capacity.

Operations of the proposed project would be similar in nature to existing operations at the site and would not introduce substantially different drainage patterns or runoff. During operations, the project site would be covered with buildings, hardscape, and landscaping. The project site is already developed and includes an existing stormwater drainage system. Operations of the proposed facilities would be similar to existing conditions and would not create or contribute to runoff that would exceed the existing drainage systems. Therefore, the existing storm drain infrastructure in the vicinity of the site would be adequate for construction and operations of the proposed project. Impacts associated with relocation or construction of

new or expanded stormwater drainage infrastructure would be less than significant. This issue will not be further evaluated in the Draft EIR.

Electricity Infrastructure

Construction and operation of the proposed project would require the consumption of energy resources such as electricity, as identified within Section 3.6, Energy, above. In the short-term, the proposed project would create additional electricity demand by adding construction equipment and workers to the project site. However, ultimately, because the number of employees under the project would be similar to existing conditions, it is not anticipated that operations of the project would result in relocation of or construction of new electricity infrastructure. Impacts would be less than significant. This issue will not be further evaluated in the Draft EIR.

Natural Gas Infrastructure

Construction and operation of the proposed project would require the consumption of energy resources such as natural gas. In the short-term, the proposed project could create additional natural gas demand by adding construction equipment and workers to the project site. However, ultimately, because the number of employees under the project would be similar to existing conditions, it is not anticipated that operations of the project would result in relocation of or construction of natural gas infrastructure. Impacts would be less than significant. This issue will not be further evaluated in the Draft EIR.

Telecommunication

As discussed above, the number of employees under the project would be similar to existing conditions. Therefore, no additional telecommunication resources would be required under the proposed project. Impacts would be less than significant. This issue will not be further evaluated in the Draft EIR.

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

Less than Significant Impact. As discussed under threshold 3.19(a), above, operation of the proposed project would be similar to operation of the existing corporate yard facility. The City's Public Works Department provides water to the project site. The project site is currently served by existing water infrastructure, and this would remain unchanged with project implementation. Because the project would not result in any new, more intense operations and would not result in an increase in the number of people on the site, there would be no need for new or expanded water facilities. Per the City's 2015 Urban Water Management Plan, the City's Public Works Department would have adequate supplies to meet demand for normal year, single dry year, and multiple dry years through 2040 (City of Pomona 2016). Therefore, because water supply increase associated with the project would be minimal, and because the City's Public Works Department has sufficient supplies to meet demand for normal, dry, and multiple dry years, impacts would be less than significant. This topic will not be further evaluated in the Draft EIR.

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

Less than Significant Impact. The City's Public Works Department provides wastewater services to the project site. During project construction, no wastewater would be generated on the project site. Upon completion of remediation and construction, the proposed project would implement a new corporate yard facility that would operate in a manner comparable to the existing corporate yard facility at the project site. The project site is currently served by existing wastewater infrastructure and this would remain unchanged with project implementation. Because the project would not result in any new, more intense operations and would not result in an increase in the number of people on the site, there would be no increase in wastewater generated by the proposed project and no need for new or expanded wastewater treatment facilities. As such, impacts associated with wastewater infrastructure and treatment facilities would be less than significant. This topic will not be further evaluated in the Draft EIR.

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

Less than Significant Impact. Four landfills serve the City of Pomona, all of which have remaining capacity. These include the Olinda Alpha Landfill, the El Sobrante Landfill, the Azusa Land Reclamation Company Landfill, and the Fontana Refuse Disposal Site. The Olinda Alpha Landfill had a remaining capacity of 34,200,000 cubic yards (CY) (CalRecycle 2019a); the El Sobrante Landfill had a remaining capacity of 3,834,470 CY (CalRecycle 2019b); Azusa Land Reclamation Company Landfill had a remaining capacity of 51,512,201 CY (CalRecycle 2017); and Fontana Refuse Disposal Site had a remaining capacity of 694,058 CY (City of Pomona 2014). Additionally, commercial recycling is available for metal, and construction and demolition materials (e.g., rock, asphalt, brick, dirt, porcelain, wood, concrete). During demolition of the existing buildings on site, any materials that could be recycled would be diverted to the Azusa Land Reclamation Company Landfill (City of Pomona 2014). All the waste generated on site during remediation would be transported to an appropriate permitted facility by licensed transporters. Remediation activities would be conducted in accordance with applicable federal, state, and local statutes and regulations related to solid waste. During construction, non-hazardous soil and any other construction-related debris would be disposed at one of the identified nearby Class III landfills, all of which have remaining capacity. Upon completion of project construction, the new corporate yard facility would operate on the same site and in the same manner as the existing corporate yard facility. Because the project would not result in any new, more intense operations and would not result in an increase in the number of people on the site, there would be no increase in solid waste generated by the proposed project and no need for new or expanded solid waste facilities. Impacts would be less than significant. This issue will not be analyzed further in the Draft EIR.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Significant Impact. The proposed project would increase solid waste generation at the project site during construction and operation, and would be required to comply with applicable local, state, and federal solid-waste disposal requirements, including but not limited to the California Integrated Waste Management Act of 1989 (AB 939); state requirements for diversion of construction and demolition debris; the City's Solid Waste Integration Resources Plan (SWIRP), and other applicable diversion plans and goals.

The proposed project would conform to all applicable federal, state, and local management and reduction statutes and regulations related to solid waste during remediation, construction, and operations. Therefore, impacts would be less than significant. This issue will not be analyzed further in the Draft EIR.

3.20 Wildfire

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

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

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan; and

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

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

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

No Impact. The project is located in a heavily developed urban area. The project site is not located in an area designated by the CAL FIRE as a very high, high, or moderate fire severity zone (CAL FIRE 2020).

Therefore, the project would not result in impacts from wildfire, including evacuation impacts, increase pollutant concentration from wildfire, exacerbate wildfire risk, or expose people to wildfire risks such as flooding or landslides. No impact would occur. This issue will not be further discussed in the Draft EIR.

3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
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)?	☒	☐	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

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

Potentially Significant Impact. See responses to thresholds 3.4(a) through 3.4(f) above, which state that, with implementation of COA-BIO-1, the project would have less than significant impacts on biological resources. Thus, the project would have the potential to substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. Responses to thresholds 3.5(a) through 3.5(c) state that the project may have potentially significant impacts on cultural resources that will be further analyzed in the Draft EIR, and responses to thresholds3.18(a)(i) and 3.18(a)(ii) above indicate a potential for significant impacts on tribal cultural

resources. Potential impacts on Air Quality, Energy, and GHG Emissions would have the potential to degrade the quality of the environment. Because of the potential for significant adverse effects on these issues, a Draft EIR will be prepared for the project.

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)?

Potentially Significant Impact. The Draft EIR will include an analysis of environmental impacts where the project may contribute to significant environmental effects that are individually limited, but cumulatively considerable when evaluated in connection with past, present, and future projects. The EIR will include a cumulative impact analysis for each of the issues determined to be potentially significant within this Initial Study. Cumulative impacts associated with the issues determined to be below a level of significance within this Initial Study are discussed below.

Regarding aesthetics, the project would not conflict with zoning or scenic regulations of the project site, nor would it damage scenic vistas or scenic resources within a state scenic highway or result in impacts related to lighting and glare. Therefore, due to the developed nature of the site and its surroundings, cumulative impacts to aesthetics are not anticipated to occur. As discussed above, with implementation of COA-BIO-1, the project would have less than significant impacts on biological resources. Therefore, no cumulative impacts associated with biological resources are anticipated. Regarding the issues of Agriculture and Forestry Resources, Mineral Resources, no such resources have been identified on the project site such that significant impacts would occur from development of the project. Therefore, redevelopment of the project site would not contribute to any cumulative losses or removal of such resources in the project area or region, or combine with other projects to result in cumulatively considerable impacts to those resources. Through compliance with existing regulations during construction, impacts to geological hazards would be less than significant. In addition, with implementation of the standard procedure outlined in Section 3.7, which would be incorporated as a condition of project approval, potential impacts to unknown paleontological resources during earthwork would be less than significant. Therefore, impacts to geology and soils, including paleontological resources, would not be cumulatively considerable. Similarly, throughout compliance with existing regulations and because the site would be similar in hydrology to existing conditions, impacts to hydrology and water quality would be less than significant and would not be cumulatively considerable.

Regarding the topic of Wildfire, the project site is not located within a Very High Fire Hazard Severity Zone and is not located in a hillside area or adjacent to wildlands that are subject to wildfire hazards. Additionally, the project would not develop land uses that could exacerbate wildfire hazards; therefore, the project would not contribute to wildfire hazards in the area or region and, as such, would not result in cumulatively considerable impacts in the category of wildfire.

The proposed project would be consistent with the zoning and land use designation of the site, as well as existing uses on-site. Therefore, the project would not result in cumulative impacts to land use and planning. The proposed project would not generate direct population growth and therefore, demand for public services, such as fire, police, schools, libraries, or parks and recreational facilities would not be significantly increased such that new facilities would be required. In addition, because the project would not generate direct population growth, impacts to population and housing would not be cumulatively considerable. Further, because the project would not result in any new, more intense operations and would not result in an

increase in the number of people on the site, there would be no need for new or expanded utilities. Therefore, cumulative impacts related to public services, parks and recreation, and utilities would not occur under the proposed project.

For these reasons, no cumulatively considerable impacts would occur in the categories of Aesthetics, Agriculture and Forestry Resources, Biological Resources, Geology and Soils, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Population and Housing, Public Services (schools and parks), Recreation, Utilities and Service Systems, or Wildfire, and no further analysis of these topics will be provided in the Draft EIR.

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

Potentially Significant Impact. The project has the potential for significant impacts related to Air Quality; Cultural Resources; Energy; Greenhouse Gas Emissions; Hazards and Hazardous Materials; Noise; Transportation; and Tribal Cultural Resources, which may cause substantial adverse effects on human beings, either directly or indirectly. These potential effects will be analyzed in the Draft EIR.

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4.2 List of Preparers

Dudek

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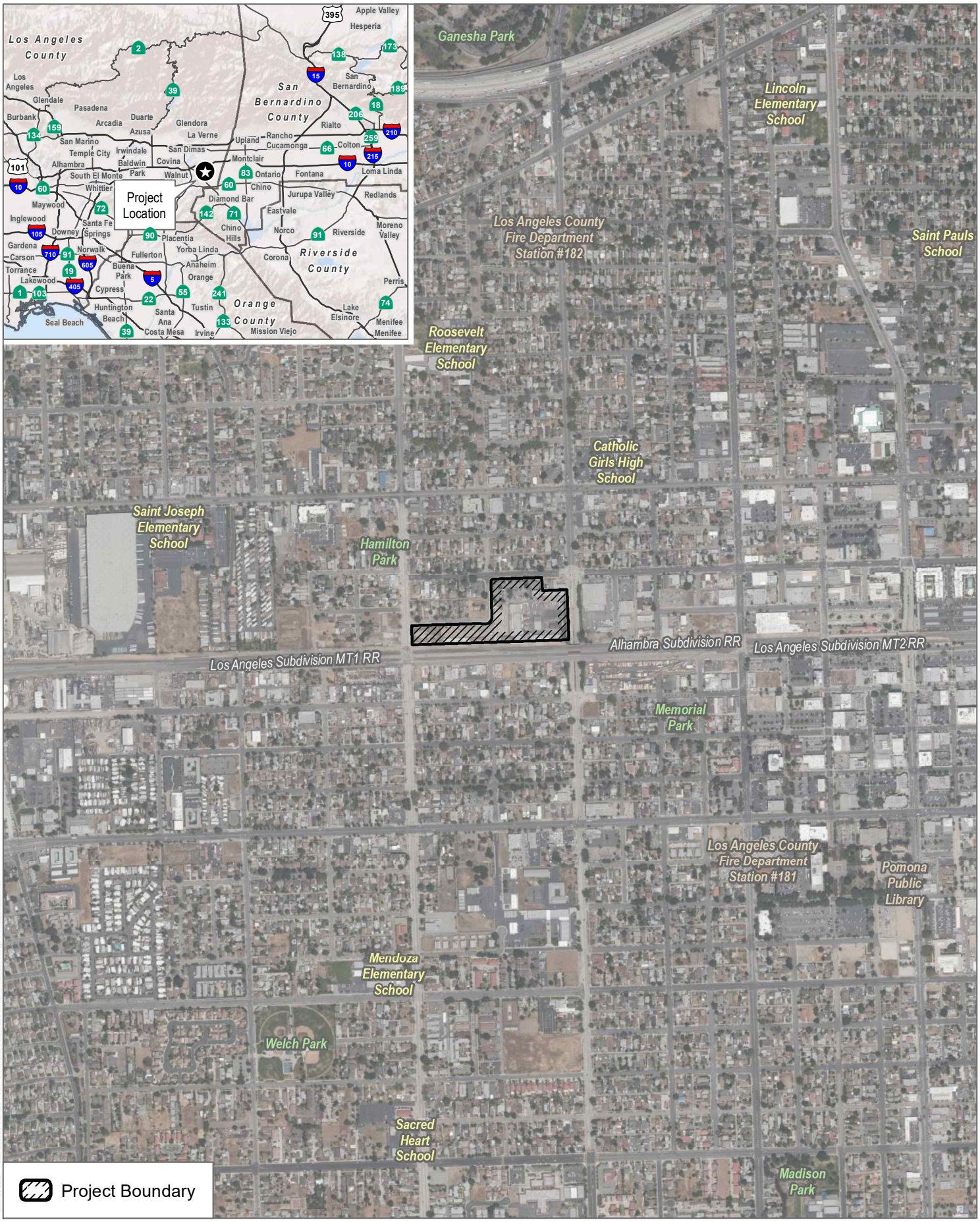

SOURCE: Bing Aerials (accessed 2020), OpenStreetMap 2019

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0 500 1,000 Feet

FIGURE 2-1

Project Location

Pomona Stables and Corporate Yard Project

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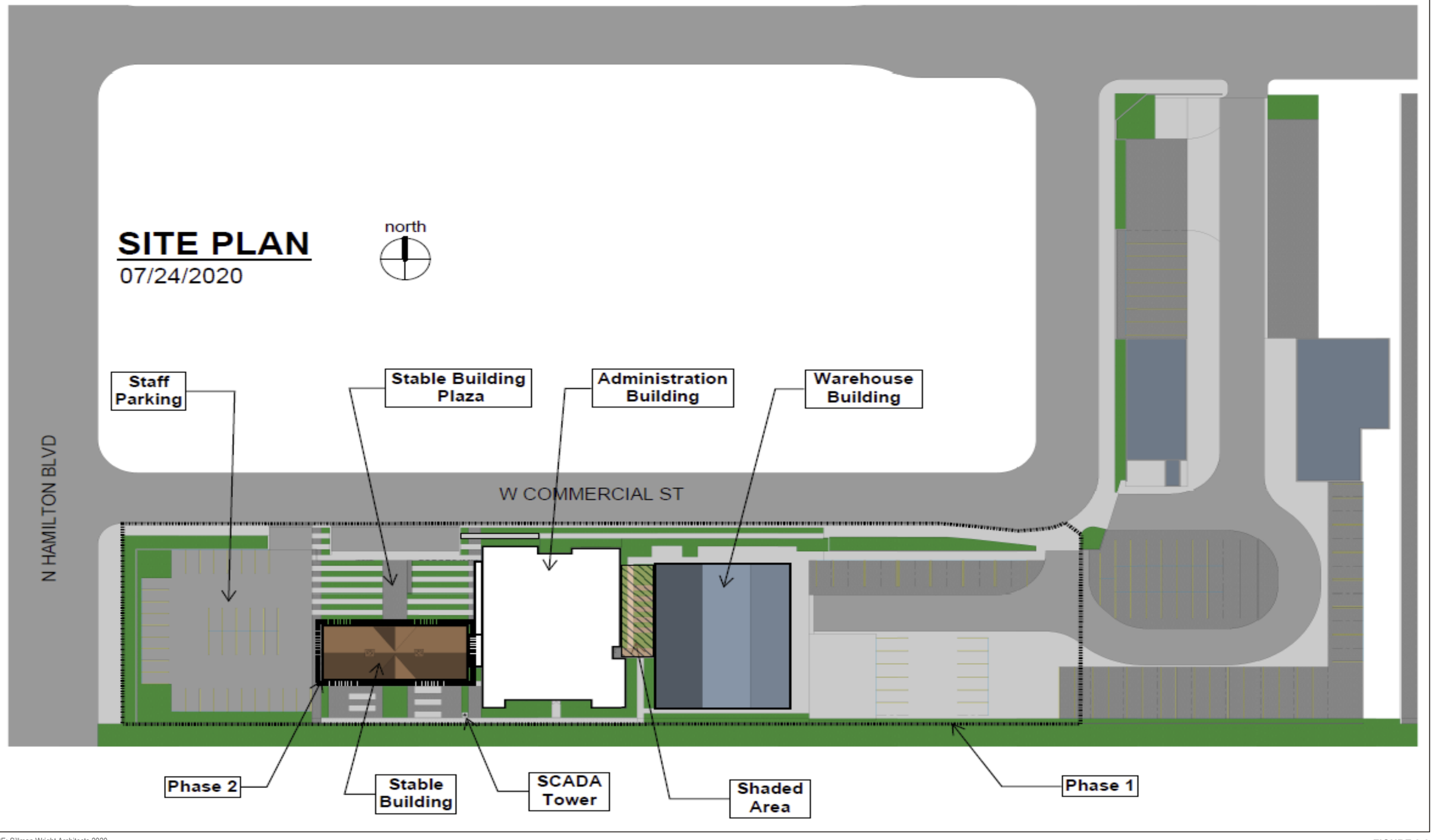

SOURCE: Sillman Wright Architects 2020

FIGURE 2-2
Site Plan
Pomona Stables and Corporate Yard Project

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