



Initial Study

Arrow Maintenance Facility Hydrogen Fuel
Upgrade Project

San Bernardino, CA

March 2021

Prepared for:

San Bernardino County
Transportation Authority

Prepared by:

HDR Engineering, Inc.

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Appendix A. Revised Environmental Assessment/Final Environmental Impact Report for the Downtown San Bernardino Passenger Rail Project

Acronyms

AB	Assembly Bill
AMF	Arrow Maintenance Facility
BMP	Best Management Practices
CDFW	California Fish and Wildlife
CEQA	California Environmental Quality Act
DMU	Diesel Multiple Unit
DSBPRP	Downtown San Bernardino Passenger Rail Project
EIR	Environmental Impact Report
GHG	Greenhouse Gases
H ₂	Hydrogen
IEMF	Inland Empire Maintenance Facility
IS	Initial Study
NPDES	National Pollutant Discharge Elimination System
Project	Arrow Maintenance Facility Hydrogen Fuel Upgrade Project
ROW	Right-Of-Way
SBCTA	San Bernardino County Transportation Authority
SCAQMD	South Coast Air Quality Management District
SWPPP	Stormwater Pollution Protection Plan
TMP	Transportation Management Plan
ZEMU	Zero Emission Multiple Unit

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Environmental Checklist Form

1. **Project Title:** Arrow Maintenance Facility Hydrogen Fuel Upgrade Project
2. **Lead agency name and address:** San Bernardino County Transportation Authority (SBCTA) 1170 W. 3rd Street 2nd Floor, San Bernardino CA 92410
3. **Contact person and phone number:** Carrie Schindler, 909.884.8276
4. **Project location:** 932 W. 3rd Street San Bernardino, CA 92410 (Figure 1)
5. **Project sponsor's name and address:** SBCTA
6. **General plan designation:** Industrial
7. **Zoning:** Industrial Heavy

8. **Description of Project:** The proposed Arrow Maintenance Facility (AMF) Hydrogen Fuel Upgrade Project (Project) would include augmentation of the AMF to allow for the integration and operation of Zero Emission Multiple Unit (ZEMU) train vehicles from the southern portion of the AMF. As a part of the proposed Project, the AMF maintenance building would be required to undergo multiple retrofits to comply with state and local requirements to facilitate the use of hydrogen (H₂) fuel for the ZEMU trains. SBCTA would also construct a new H₂ Refueling Area in the southern portion of the AMF to facilitate the refueling and operation of ZEMU train vehicles (Figure 2).

SBCTA is currently constructing the AMF, previously named the Inland Empire Maintenance Facility (IEMF), which was environmentally cleared in 2012 (State Clearinghouse No. 2011051024) and will store and operate multiple diesel multiple unit (DMU) train vehicles. Improvements to the AMF maintenance building may include heating, ventilation, and air conditioning; spark-proofing on electrical wiring; battery charging outside of the maintenance building; installation of a H₂ detection system; and a H₂ refueling pad, that would consist of a storage tank, paved pad, conversion container, and installation of additional equipment to ensure safe operation of the ZEMU trains.

9. **Surrounding land uses and setting:** The proposed Project is located within Industrial Heavy land use according to the City of San Bernardino General Plan. The area surrounding the proposed Project has the following land uses: Commercial General-1; Commercial Regional-1; Commercial Heavy; Industrial Heavy; and Residential Suburban. Interstate 215 is located immediately east of the Project. North of the Project are rail lines, industrial business, commercial business; just beyond these industrial and commercial businesses are single family homes. South and west of the Project consist of residential, industrial, and commercial properties.

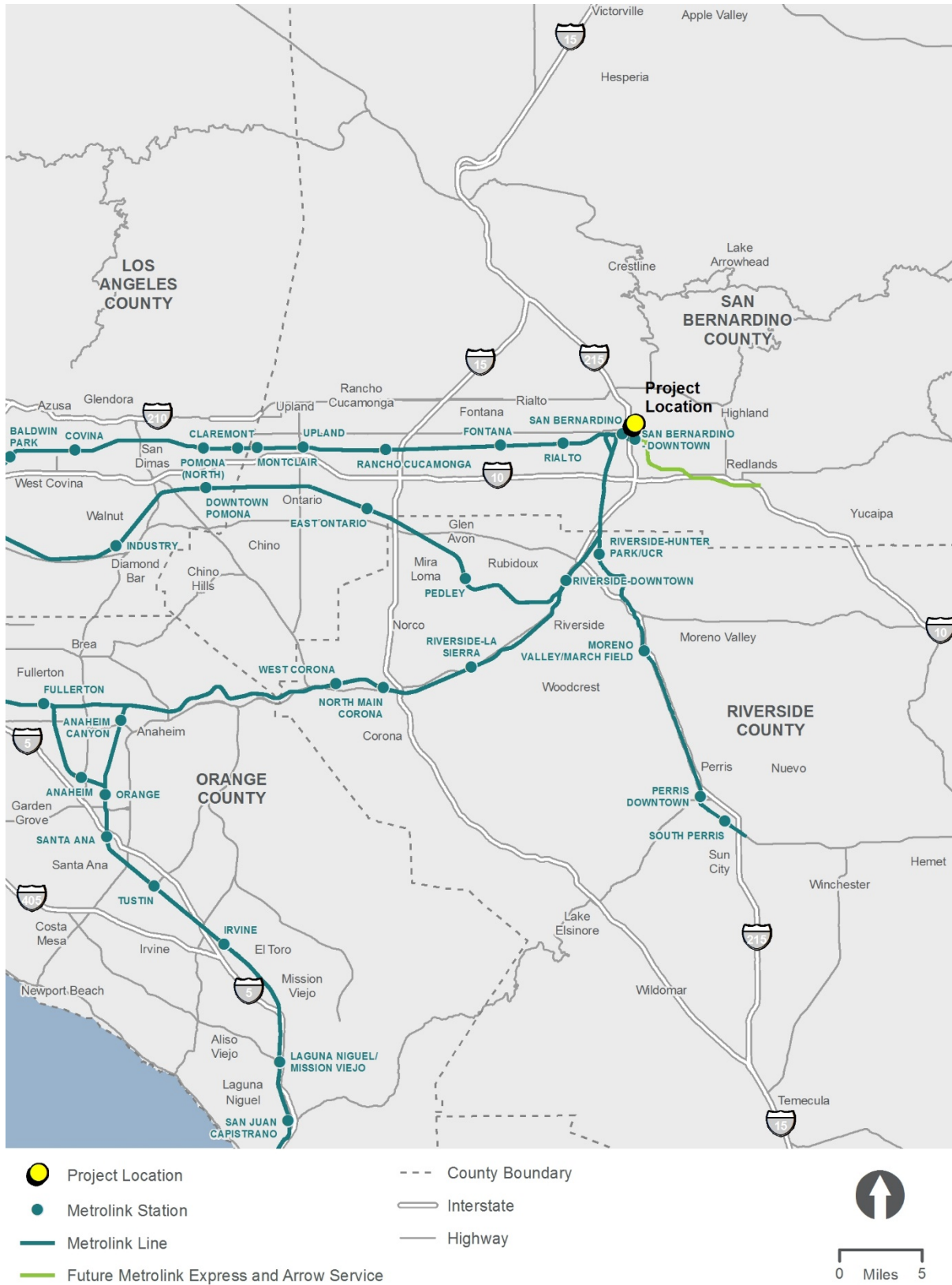
10. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):**
 - Federal Railroad Administration: operation of the ZEMU vehicle;

- Regional Water Quality Control Board: National Pollutant Discharge Elimination System (NPDES) General Construction, and Industrial Permits;
- City of San Bernardino: roadway encroachment, sanitary sewer discharge, water quality, grading, etc.;
- San Bernardino County Fire Department
- Southern California Edison: on-site electrical modifications and upgrades; and
- South Coast Air Quality Management District (SCAQMD): fugitive dust and operating permits.

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.?

Assembly Bill (AB) tribal consultation will be initiated for the proposed Project by SBCTA. AB 52 consultation will be finalized prior to approval of an environmental document. See further discussion in Section XVIII.

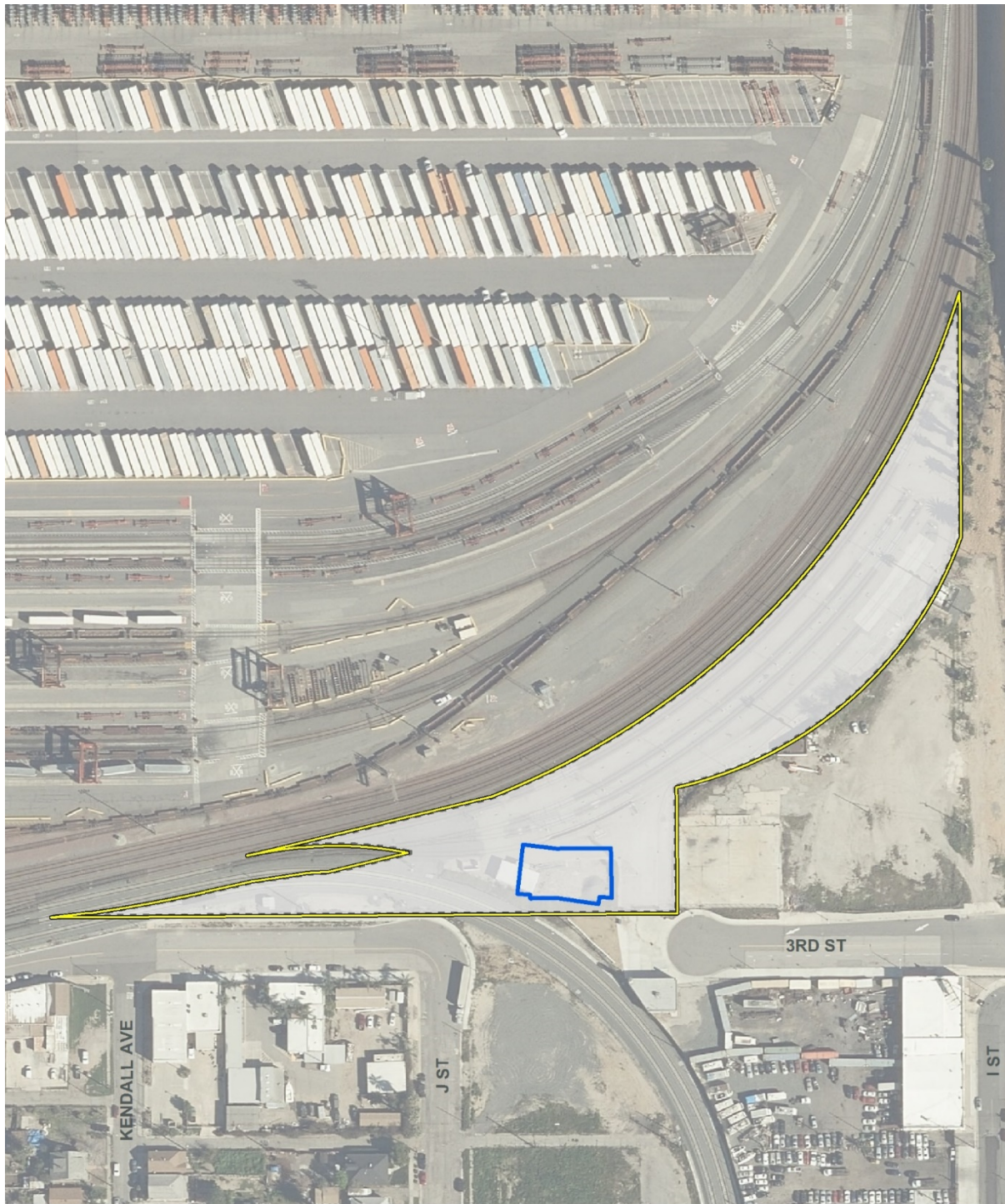
Figure 1. Regional Location



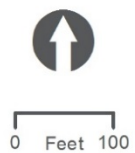


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Figure 2. Project Site



-  AMF Site
-  ZEMU Site Improvements
-  ZEMU Refueling Area





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Environmental Factors Potentially Affected

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

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

Determination (To be Completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the project would 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 (EIR) or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

02/24/2021

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 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 California Environmental Quality Act (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.

I. Aesthetics

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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Except as provided in Public Resources Code Section 21099, would the project:

a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

This analysis incorporates (by reference) SBCTA's certified EIR for the Downtown San Bernardino Passenger Rail Project (DSBPRP; State Clearinghouse Number 2011051024). The previously certified EIR considered the visual impacts of constructing and operating IEMF and is included in Appendix A. The visual impacts of the Project are generally within the scope of, and adequately analyzed in, the certified EIR, pursuant to the requirements of CEQA. No mitigation was previously adopted.

- a) **No Impact.** As discussed within the Section 3.2 of the DSBPRP EIR, no scenic vistas or corridors are present within the AMF Project site nor the surrounding area. The proposed Project would modify the previously approved AMF to allow for H2 fuel powered ZEMU trains maintenance, operations, and storage. Therefore, no impact is anticipated for this resource area, and no further analysis is required.
- b) **No Impact.** The proposed Project is located within an industrial, urbanized area. No scenic corridors are located within the Project limits, nor are there any state scenic highways located within the vicinity of the proposed Project. Therefore, no impact is anticipated for this resource area, and no further analysis is required.
- c) **Potentially Significant Impact Unless Mitigation Incorporated.** The proposed Project would reconfigure the AMF to allow for the integration of ZEMU rail operations into the Arrow service and require modifications and upgrades to the AMF to facilitate H2 storage and refueling.

The land use within the Project limits and surrounding area is primarily industrial, residential, commercial, and transportation land uses, including but not limited to, industrial and commercial buildings and operations, parking lots, transportation elements such as I-215, residential homes, ornamental landscaping, and the San Bernardino Mountains in the distance. The Project corridor is defined as the area of land that is visible from, adjacent to, and outside the highway ROW, as well as the topography, vegetation, and

viewing distance. According to the Natural Resources and Conservation Element of the city's General Plan (City of San Bernardino 2005), no scenic resources exist within the Project limits. However, the San Bernardino Mountains are identified as a scenic resource within that element and are visible from the Project limits. As stated previously, the proposed Project is not located within a designated State Scenic Highway as identified by the California Scenic Highway Mapping System (Caltrans 2011).

As discussed within the DSBPRP EIR, visual quality and character is not anticipated to have significant effect at the AMF. However, the proposed Project would introduce additional visual features such as a H₂ refueling and storage pad that would be constructed within the southern portion of AMF, potentially providing additional space for three charging stations for ZEMU batteries, a H₂ storage tank, minor spur track improvements, new piping, and associated paving. It is anticipated that the storage tank would be approximately 15 feet in height and 40 feet in length. These new elements of the proposed Project, which would create additional visual intrusions, may potentially further impact the visual quality of the area. Therefore, a potentially significant impact unless mitigation incorporated may result for this resource area and would require further analysis in the EIR.

- d) **Potentially Significant Impact Unless Mitigation Incorporated.** Lighting at the AMF would be installed as specified within the DSBPRP. The proposed Project would require the installation of additional lighting that may cause light, glare, or nighttime light pollution. Within the Project limits light and glare is attributed to existing rail operations associated with existing tracks, maintenance facility, and nearby commercial and industrial buildings and roadways. Since the proposed Project involves modifications to the AMF building and additional features within the maintenance yard in a predominantly built out environment, it is unlikely the proposed Project would significantly affect day or nighttime views with mitigation incorporated. However, given the proximity of potentially sensitive viewers, the EIR would further analyze and identify the potential impacts from light and glare as a result of the proposed Project.



II. Agriculture and Forestry Resources

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(a))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

This analysis incorporates (by reference) SBCTA's certified EIR for DSBPRP (State Clearinghouse Number 2011051024). The previously certified EIR considered the impacts of constructing and operating IEMF to agricultural resources and is included in Appendix A. As provided below, the impacts of the Project are generally within the scope of, and adequately analyzed in, the certified EIR pursuant to the requirements of CEQA. No mitigation was previously adopted.

- a) **No Impact.** As discussed within Section 3.12 of the DSBPRP EIR, the proposed Project is in a developed area with industrial, commercial, and rail uses surrounding the Project. The site is zoned as Industrial Heavy by the City of San Bernardino General Plan and Urban and Built Up- Land by the California Department of Conservation. The proposed Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural uses. The AMF site does not contain forest resources. No impact is anticipated for this resource area, and no further analysis is required.
- b) **No Impact.** See Response II(a).
- c) **No Impact.** See Response II(a).
- d) **No Impact.** See Response II(a).
- e) **No Impact.** See Response II(a).



III. Air Quality

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

This analysis incorporates by reference SBCTA's certified EIR for DSBPRP (State Clearinghouse Number 2011051024). The previously certified EIR considered the impacts of constructing and operating IEMF to air quality and is included in Appendix A. As provided below, the impacts of the Project on air quality are generally within the scope of, and adequately analyzed in, the certified EIR, pursuant to the requirements of CEQA. No mitigation was previously adopted.

- a) **Less than Significant.** The proposed Project is located within the SCAQMD and is subject to the air quality standards implemented by the U.S. Environmental Protection Agency and California Air Resources Board. The SCAQMD and Southern California Association of Governments developed the Air Quality Management Plan to improve regional air quality by addressing California Clean Air Act requirements and demonstrating attainment with state and federal ambient air quality standards.

The proposed Project could potentially include the construction of a new H2 refueling and storage pad, with space for three charging stations for the ZEMU batteries, an H2 storage tank, minor spur track improvements, new piping, and associated paving. Construction of the proposed Project could consist of ground-disturbing activities, including grading, cut and fill, or import or export of soils. Construction activities would be short term; however, emissions may exceed the Air Quality Management Plan.

Operation of the proposed Project would replace one DMU daily operation with a ZEMU train; however, there are emissions associated with the production and transport of the H2 fuel used by the ZEMU trains. These emissions are expected to be less than significant pending further analysis in the EIR.

- b) **Less than Significant.** As discussed above in Response III(a), the proposed Project would involve short-term construction activities that may result in short-term, temporary air emissions, which may result in cumulatively considerable net increases of criteria pollutants. Limited emissions are anticipated with operation and maintenance and additional analysis for the use of H2 powered trains and its impacts on air quality is required. Therefore, a less than significant impact is anticipated for this resource area pending further analysis in the EIR.

- c) **Potentially Significant Impact Unless Mitigation Incorporated.** Temporary construction related air emissions would result as a part of the proposed Project, as well as air emissions associated with the H₂ fuel as a part of operational uses. Sensitive receptors include land uses, such as residential areas and schools, where individuals are more susceptible to the effects of adjacent land uses and are exposed for prolonged durations. The closest sensitive receptors are located approximately 400 feet from the Project limits. Therefore, a potentially significant impact is anticipated for this resource area in the absence of mitigation and would require further analysis in the EIR.
- d) **Less than Significant Impact.** As discussed above, the proposed Project would integrate the ZEMU vehicle to SBCTA's Arrow service and would involve the construction and improvement of related facilities. Construction vehicles and activities may generate construction related odors; however, these impacts would be temporary. The proposed Project would comply with SCAQMD rules regarding construction activities and materials, which regulate the use of materials and/or construction equipment that would create a significant level of objectionable odors. A less than significant impact is anticipated for this resource area, and no further analysis is required.



IV. Biological Resources

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

This analysis incorporates by reference SBCTA's certified EIR for DSBPRP (State Clearinghouse Number 2011051024). The previously certified EIR considered the impacts of constructing and operating IEMF on biological resources and is included in Appendix A. The impacts of the Project are generally within the scope of, and adequately analyzed in, the certified EIR, pursuant to the requirements of CEQA. Mitigation Measures BR-1: Conduct preconstruction nest survey for migratory birds; BR-2: Establish buffer area for migratory bird nests; and BR-3: Restrict uses within Project study area boundaries, were previously adopted and implemented by SBCTA.

- a) **Less than Significant Impact.** The proposed Project limits were previously analyzed within the DSBPRP EIR, and the previous mitigation measures implemented as described in Section 3.4, Biological Resources. The proposed Project is in the San Bernardino Basin in the northern Peninsular Ranges geomorphic province, specifically on SBCTA-owned land, zoned for Heavy Industrial use. The surrounding areas are generally industrial or commercial uses and existing railway immediately to the north. Vegetation communities within the proposed Project limits consist of urban and developed habitats composed mainly of paved and other impervious surfaces.

Sensitive Botanical Species

Sensitive plants include those listed by U.S. Fish and Wildlife Service and California Fish and Wildlife (CDFW) as threatened or endangered, candidates for listing by the U.S. Fish and Wildlife Service and CDFW, and/or are considered sensitive by the CDFW and/or the California Native Plant Society. A list of special-status plant species that occur within the Project area were assessed within the DSBPRP EIR based on database searches including the California Natural Diversity Database and California Native Plant Society. One sensitive plant species, smooth tarplant (*Centromadia pungens* ssp. *laevis*), has a low potential of occurring within the proposed Project area. Smooth tarplant is a California Native Plant Society List 1B.1 species which are known to occur in dry open and sometimes disturbed habitat. The proposed Project site is entirely developed and would not support sensitive botanical species. No impact is anticipated for this resource area, and no further analysis is required.

Sensitive Wildlife Species

Sensitive wildlife species are listed as threatened, endangered, or being evaluated (proposed) for listing by the U.S. Fish and Wildlife Service and CDFW. In addition, other wildlife species include a sensitive designation for species of special concern that would also include a number of migratory bird species protected under the Migratory Bird Treaty Act. As indicated in the DSBPRP EIR, western yellow bat (*Lasiurus xanthinus*) would have low potential to occur within the area of the proposed Project, specifically roosting in palm trees. Due to the lack of roosting sites and the developed and disturbed nature of the proposed Project site, individuals are less likely to be disturbed during construction. Additionally, the DSBPRP EIR determined the proposed Project limits and surrounding area does not provide suitable foraging habitat for the burrowing owl, and burrowing owls are not anticipated to be encountered. No impact is anticipated for this resource area, and no further analysis is required.

Migratory Birds

As incorporated within the DSBPRP EIR, the Project site is located within developed habitats where foraging would be unsuitable due to the lack of biological resources present. The DSBPRP EIR noted buildings and rooftops could serve as suitable nesting and roosting sites for avian species protected under the Migratory Bird Treaty Act. However, prior construction activities have removed any of the suitable habitat that was previously noted in the EIR. The proposed Project would comply with Migratory Bird Treaty Act based on the site conditions present at the time of construction (in 2024). Given the Project would contain active passenger rail operations, a less than significant impact is anticipated for this resource area, and no further analysis is required.

- b) **No Impact.** Analysis of the wetlands and wildlife corridors found within the proposed Project limits are incorporated within the previously certified EIR. The proposed Project limits are urban and developed. No riparian habitat or other sensitive, natural community is found within the proposed Project limits. No indicators of potential jurisdictional areas were identified within the proposed Project limits, and the closest potential jurisdictional area is Lytle Creek, located over 1 mile west of the proposed Project. In addition, due to the largely developed and urban areas surrounding the Project site, no wildlife corridors exist in, or near, the Project area. Construction of the proposed Project would remain within the SBCTA right-of-way (ROW) and the previously analyzed AMF area. Therefore, no impact is anticipated for this resource area, and no further analysis is required.
- c) **No Impact.** See Response IV(b).
- d) **No Impact.** See Response IV(b).



- e) **No Impact.** Analysis of the applicable plans, policies, or ordinances pertaining to biological resources are incorporated from the previously certified EIR. The proposed Project is entirely within the SBCTA ROW at the previously analyzed AMF site, and no trees are present. If trees were present and require removal, SBCTA would not be subject to the City's tree ordinance as it is a government entity. Therefore, no impact is anticipated for this resource area, and no further analysis is required.
- f) **No Impact.** Additionally, the proposed Project is not located within, or adjacent to, an approved or adopted habitat conservation plan.

V. Cultural Resources

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
---------------------------	--------------------------------	--------------------------------------------------------	------------------------------	-----------

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

This analysis incorporates by reference SBCTA's certified EIR for DSBPRP (State Clearinghouse Number 2011051024). The previously certified EIR considered the impacts of constructing and operating IEMF on cultural resources and is included in Appendix A. As provided below, the impacts of the Project are generally within the scope of and adequately analyzed in the certified EIR, pursuant to the requirements of CEQA. Mitigation Measures CR-1: Provide photographic documentation of historic resources and noise reduction measures; CR-2: Conduct cultural resources monitoring; CR-3: Conduct paleontological monitoring; and CR-4: Stop work if unanticipated human remains are encountered, were previously adopted and implemented by SBCTA.

- a) **Less than Significant Impact.** The proposed Project is located within the previously analyzed DSBPRP Project limits and area of potential effect and would not expand or increase the physical footprint of the AMF site as previously evaluated in the DSBPRP EIR. The proposed Project would be located within SBCTA owned land approximately 0.25-mile northeast of the Santa Fe Depot, a historical site identified on the National Register of Historic Places. As a result of the proposed Project, a new H2 fueling pad would be constructed within the confines of the existing AMF and within 50 feet of the existing Depot. The physical features associated with the H2 refueling area are anticipated to result in less than significant impacts to the historic Depot. However, since the Project has not been previously analyzed within the EIR, this resource area would require further analysis in the EIR.
- b) **Potentially Significant Impact Unless Mitigation Incorporated.** A records search for new and previously recorded archeological resources was conducted within the Project area of potential effect, which was discussed within the previously certified EIR. No new resources were identified, and previously recorded resources were not eligible for the National Register of Historic Places. Additionally, the EIR determined that the potential to encounter archaeological resources at AMF during ground-disturbing activities was low.

Construction of the proposed Project would result in ground-disturbing activities within the same location as the AMF currently under construction. The modifications proposed as a part of the proposed Project as well as utility improvements and relocations may result in ground-disturbing activities deeper than the impacts analyzed within the EIR. Given the discovery of resources within Third Street during construction, a potentially significant impact is anticipated for this resource area that could occur in the absence of mitigation. This issue would require further analysis in the EIR.

- c) **Potentially Significant Impact Unless Mitigation Incorporated.** As discussed above in Response V(b), the proposed Project may result in ground-disturbing activities deeper than the impacts analyzed in the EIR for DSBPRP. Ground-disturbing activities as a result of construction have the potential to damage or destroy buried human remains, although no documented cemeteries or burial sites occur within the proposed Project limits. Therefore, a potentially significant impact is anticipated in the absence of mitigation, and this resource area would require further analysis in the EIR.



VI. Energy

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

This analysis incorporates by reference SBCTA's certified EIR for DSBPRP (State Clearinghouse Number 2011051024). The previously certified EIR considered the impacts of constructing and operating IEMF on energy and is included in Appendix A. As provided below, the impacts of the Project are generally within the scope of, and adequately analyzed in, the certified EIR, pursuant to the requirements of CEQA. No mitigation measures were adopted by SBCTA.

- a) **Less than Significant Impact.** The proposed Project would require construction activities including, but not limited to, asphalt and concrete removal, cut-and-fill activities, grading, utility relocations, and asphalt and concrete foundations to accommodate the ZEMU train vehicle to SBCTA's planned Arrow service. Construction energy consumption would result primarily from transportation fuels used for haul trucks, heavy-duty construction equipment, and construction workers traveling to and from the proposed Project limits. The proposed Project is anticipated to improve and relocate utilities within the AMF site.

Operation of the proposed Project would require the use and storage of H2 fuel for the ZEMU train vehicle. H2 fuel usage, supplies, and consistency with state and local energy plans and efficiency standards were not previously analyzed within the EIR. However, the Project objective is to reduce energy consumption and integrate alternative fuels into the Arrow operations; therefore, a less than significant impact is anticipated for this resource area.

- b) **Less than Significant Impact.** See Response VI(a).

VII. Geology and Soils

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial direct or indirect risk to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

This analysis incorporates (by reference) SBCTA's certified EIR for DSBPRP (State Clearinghouse Number 2011051024). The previously certified EIR considered the impacts of constructing and operating IEMF on geology/soils and is included in Appendix A. As provided below, the impacts of the Project are generally within the scope of, and adequately analyzed in, the certified EIR, pursuant to the requirements of CEQA. Mitigation Measure G-1: Comply with geotechnical recommendations, was previously adopted and implemented by SBCTA.

- a) **Less than Significant Impact.** The proposed Project is located within the previously analyzed DSBPRP footprint within a seismically active area of Southern California. The potential exists for the site to experience strong ground shaking from nearby faults during an earthquake. The Project site is not located within an Alquist-Priolo fault zone, and the closest fault, the San Jacinto fault (San Bernardino section), is located more than 1 mile southwest of the Project limits. The San Bernardino section of the San Andreas Fault is located approximately 4 miles northeast of the Project limits.

A geotechnical investigation was conducted for the EIR, which analyzed the San Jacinto Fault and San Andreas Fault, indicating that these faults do not impose a surface rupture hazard for the proposed Project. In addition, the new Holocene-aged faults, located approximately 2 miles from the Project site, would not have an impact on the proposed Project due to their distance. Additionally, the proposed Project was determined by the DSBPRP to not be located in an area susceptible to seismic related liquefaction or landslide risk.

The proposed Project would be required to implement required standard engineering practices, site-specific engineering practices identified within the EIR, and California Building Code standards in the design and construction of the proposed Project. Therefore, a less than significant impact is anticipated for this resource area, and no further analysis is required.

- b) **Less than Significant Impact.** Construction of the proposed Project would include grading and excavation activities that could expose soils within the Project site to wind and water erosion. As discussed within the EIR, the construction contractor would be required to comply with the NPDES General Construction Permit and, potentially, an Industrial General Permit, as well as prepare and implement a Stormwater Pollution Protection Plan (SWPPP) for the Project. The SWPPP would require erosion control best management practices (BMP), including the use of proper grading techniques, proper soil stabilization, sediment control, and runoff control. Therefore, a less than significant impact is anticipated for this resource area, and no further analysis is required.
- c) **Less than Significant Impact.** The proposed Project is located within the previously analyzed DSBPRP footprint. The Project limits have a low potential for liquefaction hazards due to low-lying groundwater levels observed during geotechnical drilling. Additionally, it was determined that the Project limits are primarily underlain by medium to dense silty sand interbedded with stiff to very stiff silt. The Project area is located within an alluvial dispositional landscape characterized by unconsolidated sediments at depth, susceptible to settlement. As previously stated in Response VII(a), the proposed Project would follow applicable building codes and site-specific building recommendations identified within the EIR. Therefore, a less than significant impact is anticipated for this resource area, and no further analysis is required.
- d) **No Impact.** The proposed Project is located within the previously analyzed DSBPRP footprint where the soils are not known to have expansive qualities. The soils found near the surface consist of predominantly silty sand with very low expansion potential. Therefore, no impact is anticipated for this resource area, and no further analysis is required.
- e) **No Impact.** The proposed Project would be an integration of the ZEMU train line into SBCTA's Arrow service, including the construction of any related facilities. No septic tanks or alternative wastewater disposal systems are proposed as a part of the Project; therefore, no impact is anticipated for this resource area, and no further analysis is required.
- f) **Potentially Significant Impact Unless Mitigation Incorporated.** As discussed above in Response VII(c), the proposed Project may result in ground-disturbing activities differing from the ground-disturbing activities identified in EIR for the AMF location. Ground-disturbing activities as a result of construction have the potential to damage or destroy buried paleontological resources. Therefore, a potentially significant impact is anticipated for this resource area in the absence of mitigation and would require further analysis in the EIR.

VIII. Greenhouse Gas Emissions

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

Impact Analysis

This analysis incorporates (by reference) SBCTA's certified EIR for DSBPRP (State Clearinghouse Number 2011051024). The previously certified EIR considered the emissions of greenhouse gases (GHG) as part of constructing and operating IEMF and is included in Appendix A. As provided below, the impacts of the Project are generally within the scope of, and adequately analyzed in, the certified EIR, pursuant to the requirements of CEQA. No mitigation measures were adopted by SBCTA.

- a) **Less than Significant Impact.** As discussed within the Section III. Air Quality section of this Initial Study (IS), the proposed Project would require construction activities that could result in the emission of GHGs. Construction equipment typically uses fossil-based fuels to operate, releasing GHG after use; however, construction would be short term, and emissions of GHGs would be temporary. As a part of the proposed Project, the ZEMU trains and H2 fuel are anticipated to have a beneficial impact on GHG by removing the use of one DMU train within the Arrow service. However, as there are emissions associated with the production and transport of the H2 fuel used by the ZEMU trains, further analysis would be required to determine the effects of the proposed Project on GHG. Operation of the ZEMU train would implement low- or zero-emission technologies that could reduce the emission of GHGs. A less than significant impact is anticipated for this resource area pending additional analysis in the EIR.
- b) **Less than Significant Impact.** As discussed above, the proposed Project has the potential to increase GHGs during construction; however, due to the relatively limited scale and short-term, temporary nature of construction, a substantial increase in GHG emissions within the Project area would be unlikely. In addition, operation of the ZEMU train is anticipated to be a beneficial impact on GHG emissions. Therefore, a less than significant impact is anticipated for this resource area.

IX. Hazards and Hazardous Materials

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

This analysis incorporates (by reference) SBCTA's certified EIR for DSBPRP (State Clearinghouse Number 2011051024). The previously certified EIR considered the impacts of constructing and operating IEMF on existing hazards and hazardous materials and is included in Appendix A. As provided below, the impacts of the Project are generally within the scope of, and adequately analyzed in, the certified EIR, pursuant to the requirements of CEQA. Mitigation Measures HM-1: Comply with hazards and hazardous materials recommendations and HM-2: Plan and monitor for hazardous materials, were previously adopted and implemented by SBCTA.

- a) **Potentially Significant Impact Unless Mitigation Incorporated.** The proposed Project would be located within the AMF site previously analyzed within the DSBPRP footprint and environmentally cleared within the EIR. Project construction activities may include the use of commercially available hazardous materials, such as fuels, brake fluids, coolants, and paints. These activities would be temporary or one-time events. The proposed Project would be required to comply with federal, state, and local regulations for the routine transport, use, and disposal of any hazardous materials. These regulations include the Resource Conservation and Recovery Act; U.S. Department of Transportation Hazardous Materials Regulations (Code of Federal Regulations Title 29); and the California Health and Safety Code, in combination with construction BMPs that would be implemented during Project construction. Any accidental release of these materials due to spills or leaks would be cleaned up in the normal course of business, consistent with the above-mentioned regulations.

As identified within the EIR, during construction, ground-disturbing activities may occur near recognized environmental condition or historical recognized environmental condition sites within and surrounding the Project area and may result in impacts related to hazardous wastes. The proposed Project may potentially include the construction of fueling pads, ZEMU battery chargers, and an H2 storage tank. Project operations would require the transportation, use, and storage of H2, which can result in potentially significant impacts. A potentially significant impact is anticipated for this resource area in the absence of mitigation and would require further analysis in the EIR.

- b) **Potentially Significant Impact.** As a part of the proposed Project, the integration of the ZEMU train would involve the construction of related facilities, including fueling pads, ZEMU battery chargers, and an H2 storage tank. H2 used in fuel is a colorless, odorless, and tasteless flammable gas that can cause fires and explosions. Due to its nature, detecting leaks is difficult and can collect in a semi-dense cloud, that, when exposed to an ignition source, can result in a flame front traveling at supersonic speeds. Storage of liquid H2 can also result in the explosion of the container under superheated conditions. The industrial and mixed-use buildings surrounding the Project area would be affected by both instances, that could result in serious injury. Therefore, a potentially significant impact is anticipated for this resource area and would require further analysis in the EIR.
- c) **No Impact.** No existing schools have been identified within 0.25 mile of the proposed Project. The nearest school to the Project limits is Lytle Creek Elementary School, which is located approximately 0.45 mile to the south. As such, implementation of the proposed Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. No impact is anticipated for this resource area, and no further analysis is required.
- d) **Potentially Significant Impact.** According to the EIR, the Project limits intersect with a portion of the historic Santa Fe Depot, located at 1170 and 1260 West 3rd Street (across several assessor parcel numbers). The Depot is listed within the following site operations relative to hazmat issues, railroad depot, open Spills, Leaks, Investigations, and Cleanup, leaking underground storage tanks, Historic Hazardous Waste and Substances Sites (Cortese) List (Government Code Section 65962.5), and historic underground storage tank listings. The risk ranking for this site which crosses into the Project limits is identified as high. Therefore, a potentially significant impact is anticipated for this resource area in the absence of mitigation and would require further analysis in the EIR.
- e) **No Impact.** The proposed Project is not located within 2 miles of an airport or private airstrip. The nearest airport is San Bernardino International Airport, located approximately 3 miles southeast of the Project site. No impact is anticipated for this resource area, and no further analysis is required.
- f) **Less than Significant Impact.** Construction activities as a result of the proposed Project have the potential to result in temporary impacts on local traffic patterns and cause temporary traffic delays for emergency service vehicles. The proposed Project would be contained within the SBCTA ROW in an area planned for train maintenance, away from publicly accessible roadways. Construction deliveries to the proposed Project may cause traffic delays, however, those trips would be short-term or one-time events. In addition, standard construction practices, implementation of a Transportation Management Plan (TMP), if needed, and preconstruction coordination with emergency responders would minimize impacts. Operation of the proposed Project would be in accordance with all applicable state and local requirements regarding any emergency evacuation plans. Therefore, a less than significant impact is anticipated for this resource area, and no further analysis is required.

- g) **No Impact.** As discussed within the EIR, the proposed Project is located within the City of San Bernardino, where wildland fires occur within hillside areas of the city. In addition, the San Bernardino development code and general plan designate a Foothill Fire Zone Overlay District, setting standards for new development that help to mitigate the spread of fire, help minimize property damage, and reduce risks to public health and safety. The proposed Project is not located in or in the vicinity of the city's hillsides or Foothill Fire Zone Overlay District. No impact is anticipated for this resource area, and no further analysis is required.

X. Hydrology and Water Quality

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

Impact Analysis

This analysis incorporates (by reference) SBCTA's certified EIR for DSBPRP (State Clearinghouse Number 2011051024). The previously certified EIR considered the impacts of constructing and operating IEMF on existing hydrology and water quality and is included in Appendix A. As provided below, the impacts of the Project are generally within the scope of, and adequately analyzed in, the certified EIR, pursuant to the requirements of CEQA. Mitigation Measures HYD-1: Develop and implement a stormwater pollution prevention plan and HYD-2: Develop and implement a water quality management plan, were previously adopted and implemented by SBCTA.

- a) **Less than Significant Impact.** The proposed Project may involve construction activities, including excavation, soil stockpiling, and grading. Pollutants typical of construction work, such as sediments, trash, petroleum products, concrete waste, sanitary waste, and chemicals, could significantly affect water quality. Since the proposed Project would result in a disturbed soil area greater than 1 acre, the proposed Project would be required to comply with the NPDES Construction General Permit, and potentially, the Industrial General Permit. In addition, the proposed Project would be required to prepare and implement a SWPPP. The SWPPP would identify temporary BMPs to address the potential temporary impacts on water quality. The temporary BMPs identified in the Project SWPPP may include, but not be limited to, measures such as temporary slope reinforcement and stabilization measures (e.g., hydraulic mulch [bonded fiber mix], temporary cover), linear sediment barriers (e.g., fiber rolls, gravel bag berms), and construction site waste management (e.g., street sweeping, concrete washout), as well as temporary construction entrance and drainage inlet protection.

Implementation of the proposed Project is not anticipated to increase the amount of impervious area compared to the existing site plan for the AMF currently under construction. Therefore, a less than significant impact is anticipated for this resource area, and no further analysis is required.

- b) **No Impact.** The proposed Project does not propose to use groundwater resources or to otherwise affect any groundwater resources that are used for water supply. The Project is not located in an area identified for groundwater recharge. As such, the Project would not substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater water table. Therefore, no impact is anticipated for this resource area, and no further analysis is required.
- c) **Less than Significant Impact.** As discussed in Response X(a), the proposed Project would be required to comply with the Construction General Permit and develop a SWPPP to address all potential sources of pollution, which may affect water quality, including sediment erosion and siltation. Implementation of the proposed Project would not substantially alter the existing drainage pattern throughout the Project limits and surrounding area nor would it impede flows. The Project would integrate with existing drainage improvements constructed as a part of DSBPRP. The AMF site, a part of the DSBPRP, is currently under construction and would be completed prior to the start of construction for this Project. Once construction is complete, the proposed Project is anticipated to have a similar drainage pattern to the existing setting. A less than significant impact has been identified for this resource area, and no further analysis is required.
- d) **No Impact.** The proposed Project is located over 50 miles east of the Pacific Ocean, and the nearest waterbody is located over 1 mile to the east. As discussed in the EIR, the Federal Emergency Management Agency flood map for the AMF site is located in Zone X or an area outside of the 100-year floodplain zone. The proposed Project is not at risk of inundation by seiche, tsunami, or mudflow. Therefore, no impact is anticipated for this resource area, and no further analysis is required.
- e) **No Impact.** As discussed above in Response X(a) and (b), the proposed Project would be designed and implemented consistent with the federal, state, and local water quality control plans and groundwater management plans.

The proposed Project would be designed to meet the water quality standards outlined by NPDES permit, the Construction General Permit, the Industrial General Permit, and the Santa Ana River Basin Plan. In addition, the proposed Project does not propose to use groundwater resources or otherwise affect any groundwater resources that are used for water supply. The proposed Project is not located in an area identified for groundwater recharge. As such, the proposed Project would not substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater water table. The proposed Project would not conflict with or obstruct the implementation of any applicable water quality control plans or groundwater management plans. Therefore, no impact is anticipated for this resource area, and no further analysis is required.

XI. Land Use and Planning

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

This analysis incorporates (by reference) SBCTA's certified EIR for DSBPRP (State Clearinghouse Number 2011051024). The previously certified EIR considered the impacts of constructing and operating IEMF on existing land use and planning and is included in Appendix A. As provided below, the impacts of the Project are generally within the scope of, and adequately analyzed in, the certified EIR, pursuant to the requirements of CEQA. No mitigation measures were previously adopted by SBCTA.

- a) **No Impact.** The proposed Project would involve the integration of a ZEMU train into the SBCTA's Arrow service, specifically construction would be contained within SBCTA's existing AMF site. The proposed Project would not physically divide an established community. Therefore, no impact is anticipated for this resource area, and no further analysis is required.
- b) **Potentially Significant Impact Unless Mitigation Incorporated.** Applicable City of San Bernardino General Plan, Regional Transportation Plan, and Southern California Association of Governments goals and policies were analyzed within the DSBPRP EIR. The proposed Project would be located within the previously approved DSBPRP footprint and located entirely within SBCTA's ROW. The proposed Project would represent a new use at an existing maintenance facility site on industrially zoned land. The new use could conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, which is considered a significant impact. Therefore, a potentially significant impact is anticipated for this resource area and would require further analysis is required.

XII. Mineral Resources

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

This analysis incorporates (by reference) SBCTA's certified EIR for DSBPRP (State Clearinghouse Number 2011051024). The previously certified EIR considered the impacts on mineral resources and is included in Appendix A. As provided below, the impacts of the Project are generally within the scope of, and adequately analyzed in, the certified EIR, pursuant to the requirements of CEQA. No mitigation measures were previously adopted by SBCTA.

- a) **No Impact.** The proposed Project is located within an area designated as MRZ-2, an area with a likelihood of significant mineral deposits. However, the Project limits and the surrounding areas are developed for nonmineral extraction uses, specifically Industrial Heavy. The proposed Project is not within an Industrial Extractive zone and would not interfere with any current mining activity or prevent access to any areas where mining activities would be allowed. Therefore, no impact is anticipated for this resource area, and no further analysis is required.
- b) **No Impact.** See Response XII(a).

XIII. Noise

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundbome vibration or groundbome noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

This analysis incorporates (by reference) SBCTA's certified EIR for DSBPRP (State Clearinghouse Number 2011051024). The previously certified EIR considered the impacts of constructing and operating IEMF on ambient noise and vibration and is included in Appendix A. As provided below, the impacts of the Project are generally within the scope of, and adequately analyzed in, the certified EIR, pursuant to the requirements of CEQA. Mitigation Measures NOI-1: Employ noise-reducing measures during construction; NOI-2: Prepare a community awareness program for Project construction; NOI-3: Use ballast mats, resiliently supported ties, or measures of comparable effectiveness on portions of the rail near sensitive receivers; NOI-4: Establish quiet zones; NOI-5: Provide building noise insulation to severe- and moderate-impact residences where sound barriers are infeasible; and NOI-6: Lubricate wayside rail, were previously adopted and implemented by SBCTA.

- a) **Less than Significant Impact.** Construction of the proposed Project would result in short-term, temporary increases in noise; however, activities would be isolated to the AMF site. Construction activities are anticipated to occur between the hours of 7:00 a.m. to 7:00 p.m. on weekdays and Saturdays, in accordance with City of San Bernardino standards. If construction work is required outside of those hours, SBCTA would obtain a permit for said construction activities.

Construction of the Project would require use of heavy equipment, which may be periodically audible at off-site locations. Received sound levels would vary and fluctuate based on the construction activity, equipment class and type, and distance between noise source and receiver at any given time. The proposed Project is anticipated to implement noise-reducing techniques, as discussed within the EIR, and operational noise generated by the ZEMU would be comparable to the DMUs (and Metrolink locomotives) proposed for initial operations. Therefore, a less than significant impact is anticipated for this resource area, and no further analysis is required.

- b) **Less than Significant Impact.** The proposed Project construction activities would have the potential to generate ground-borne vibration with the use of heavy equipment. As discussed in Response XIII(a), construction is anticipated to be limited to the hours of 7:00 a.m. to 7:00 p.m. on weekdays and Saturdays, in accordance with City of San Bernardino standards. Standard conditions would be implemented to reduce and minimize noise generated by construction, as well as to reduce the vibration from construction activities. The proposed Project is anticipated to implement vibration-reducing techniques, as discussed within the EIR, and operational noise generated by the ZEMU would be comparable to the DMUs (and Metrolink locomotives) proposed for initial operations. Therefore, a less than significant impact is anticipated for this resource area, and no further analysis is required.
- c) **No Impact.** The proposed Project is not located within 2 miles of an airport or private airstrip. The closest airport is located approximately 3 miles southeast of the Project limits. Therefore, no impact is anticipated for this resource area, and no further analysis is required.

XIV. Population and Housing

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

This analysis incorporates (by reference) SBCTA's certified EIR for DSBPRP (State Clearinghouse Number 2011051024). The previously certified EIR considered the impacts of constructing and operating IEMF on existing population and housing and is included in Appendix A. As provided below, the impacts of the Project are generally within the scope of, and adequately analyzed in, the certified EIR pursuant to the requirements of CEQA. No mitigation measures were previously adopted by SBCTA.

- a) **No Impact.** The proposed Project would involve the integration of one ZEMU train into SBCTA's Arrow service, including the construction of related maintenance and fueling facilities. The Project does not propose the construction of new residential units or commercial buildings. The purpose of the proposed Project is to modify the AMF site to replace one DMU train with a ZEMU train and provide improvements to the AMF site to accommodate the ZEMU train. The proposed Project would be consistent with the DSBPRP EIR to accommodate the same transportation demand with SBCTA's Arrow service. Therefore, no impact is anticipated for this resource area, and no further analysis is required.
- b) **No Impact.** The proposed Project would be located entirely within SBCTA's ROW, a developed area zoned for Industrial Heavy. Acquisition of properties would not be required; therefore, no displacement of existing people or housing would result. Therefore, no impact is anticipated for this resource area, and no further analysis is required.

XV. Public Services

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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:				
i. Fire Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Police Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

This analysis incorporates (by reference) SBCTA's certified EIR for DSBPRP (State Clearinghouse Number 2011051024). The previously certified EIR considered the impacts of constructing and operating IEMF on public services and is included in Appendix A. As provided below, the impacts of the Project are generally within the scope of, and adequately analyzed in, the certified EIR, pursuant to the requirements of CEQA. No mitigation measures were previously adopted by SBCTA.

- a) **No Impact.** Similar to the approved DSBPRP Project, the proposed Project would be limited to rail and facility improvements at the AMF site within SBCTA ROW and would not generate population growth that would otherwise place new demands on local public fire and police protection services or schools. Additionally, the proposed Project does not include a residential component which would otherwise result in an incremental increase in demand on public services. Therefore, no impact is anticipated for this resource area, and no further analysis is required.

XVI. Recreation

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

Impact Analysis

This analysis incorporates (by reference) SBCTA's certified EIR for DSBPRP (State Clearinghouse Number 2011051024). The previously certified EIR considered the impacts of constructing and operating IEMF on existing recreation and is included in Appendix A. As provided below, the impacts of the Project are generally within the scope of, and adequately analyzed in, the certified EIR, pursuant to the requirements of CEQA. No mitigation measures were previously adopted by SBCTA.

- a) **No Impact.** The proposed Project would not contribute to population growth that could result in an increased use of existing neighborhood and regional parks, nor does the proposed Project include or require the construction or expansion of recreational facilities. Therefore, no impact is anticipated for this resource area, and no further analysis is required.
- b) **No Impact.** See Response XVI(a).

XVII. Transportation

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

This analysis incorporates (by reference) SBCTA's certified EIR for DSBPRP (State Clearinghouse Number 2011051024). The previously certified EIR considered the impacts of constructing and operating IEMF on existing transportation and traffic and is included in Appendix A. The impacts of the Project are generally within the scope of, and adequately analyzed in, the certified EIR, pursuant to the requirements of CEQA. Mitigation Measures T-1: Prepare and implement a traffic management plan; T-2: Prepare and implement a stadium parking plan; T-3: Install a traffic signal at the J Street/2nd Street intersection; and T-4: Install all-way stops at the J Street/Rialto Avenue intersection, were previously adopted and implemented by SBCTA.

- a) **No Impact.** The proposed Project would integrate one ZEMU train into SBCTA's Arrow service and include construction of related facilities and improvement of existing AMF site. The proposed Project would be entirely contained within SBCTA ROW. No street closures or roadway reconfigurations are proposed as a part of the Project. The proposed Project would reconfigure a planned maintenance facility located on SBCTA property to accommodate ZEMU train facilities and may include space for an H2 storage container and three chargers for ZEMU batteries. The proposed Project would not alter the circulation for transit, roadway, bicycle, or pedestrian facilities within the Project limits or the surrounding area. Therefore, no impact is anticipated for this resource area, and no further analysis is required.
- b) **Less than Significant Impact.** As analyzed in the DSBPRP EIR, transportation and traffic impacts could occur during construction through the temporary closure of streets or traffic detours. These impacts would be minimized with the implementation of the TMP. These impacts are considered temporary and short term. Project construction would be located entirely within SBCTA ROW, including staging or construction laydown areas

Operation of the proposed Project would replace one DMU train from SBCTA's Arrow service with the proposed ZEMU train. No additional services or removal of services are proposed, and transportation demands would be similar to those addressed within the EIR. Therefore, a less than significant impact is anticipated for this resource area, and no further analysis is required.
- c) **No Impact.** The proposed Project would reconfigure a planned maintenance facility to accommodate a ZEMU train located within SBCTA ROW. The proposed Project would not result in new roadways or geometric designs accessible to the public and would maintain maintenance operations within the previously approved EIR in the existing Industrial Heavy land use designation. Therefore, no impact is anticipated for this resource area, and no further analysis is required.

- d) **Less than Significant Impact.** As previously discussed within Section IX, Hazards and Hazardous Materials, of this IS, conflicts with emergency access may occur as a result of Project construction. The proposed Project would be contained within the SBCTA ROW in an area planned for train maintenance, away from publicly accessible roadways. Construction deliveries to the proposed Project may cause traffic delays; however, those trips would be short-term or one-time events. In addition, the proposed Project would prepare and implement a TMP, if needed, and preconstruction coordination with emergency responders would minimize impacts. Operation of the proposed Project would not result in activities that would impede access for local emergency operations. Therefore, a less than significant impact is anticipated for this resource area, and no further analysis is required.

XVIII. Tribal Cultural Resources

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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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)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

This analysis incorporates (by reference) SBCTA's certified EIR for DSBPRP (State Clearinghouse Number 2011051024). The previously certified EIR considered the impacts of constructing and operating IEMF on tribal cultural resources and is included in Appendix A. As provided below, the impacts of the Project are generally within the scope of, and adequately analyzed in, the certified EIR, pursuant to the requirements of CEQA. Mitigation Measures CR-2: Conduct cultural resources monitoring, and CR-4: Stop work if unanticipated human remains are encountered, were previously adopted and implemented by SBCTA.

- a) **Potentially Significant Impact Unless Mitigation Incorporated.** The proposed Project is located within the previously analyzed DSBPRP footprint. The San Bernardino Santa Fe Depot is listed on the National Register of Historic Places and is located approximately 0.25 mile southwest from the Project site. The proposed Project would involve ground-disturbing construction activities that have the potential to affect historic resources.

AB 52 took effect July 1, 2015. AB 52 requires a lead agency to make best efforts to avoid, preserve, and protect tribal cultural resources. At this time, AB 52 for this Project has not been initiated. The previously certified DSBPRP EIR conducted Native American consultation with the Native American Heritage Commission regarding any sacred lands or traditional cultural properties within the DSBPRP footprint. No significant tribal resources were discovered within the DSBPRP footprint, which includes this Project footprint. In addition, letters describing the DSBPRP Project area and Project location were sent to 11 Native American contacts with no response received.

The proposed Project may cause a substantial adverse change in the significance of a known archaeological resource pursuant to CEQA Guidelines Section 15064.5 or an identified tribal cultural resource pursuant to Public Resource Code Section 21082.3. Additionally, construction-related grading or excavation activities of the proposed Project may impact unknown or previously unrecorded archaeological resources, including potential impacts on the Santa Fe Depot listed on the National Register of Historic Places. Therefore, a potentially significant impact is anticipated for this resource area in the absence of mitigation and would require further analysis in the EIR.

- b) **Potentially Significant Impact Unless Mitigation Incorporated.** See Response XVIII(a).



XIX. Utilities and Service Systems

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

This analysis incorporates (by reference) SBCTA's certified EIR for DSBPRP (State Clearinghouse Number 2011051024). The previously certified EIR considered the impacts of constructing and operating IEMF on existing utilities and service systems and is included in Appendix A. As provided below, the impacts of the Project are generally within the scope of, and adequately analyzed in, the certified EIR, pursuant to the requirements of CEQA. No mitigation measures were previously adopted by SBCTA.

- a) **Potentially Significant Impact Unless Mitigation Incorporated.** The proposed Project would be located within the previously analyzed DSBPRP footprint, specifically the AMF site. The proposed Project would reconfigure the AMF site to accommodate ZEMU train services, including the construction of associated facilities. To comply with local regulations and avoid conflicts, the proposed Project may require improvements or relocations of existing utilities, including, but not limited to, storm drains, oil and grease separators, water (and fire) lines, and sanitary sewer lines. Based on current Southern California Regional Rail Authority utility accommodation standards and industry best practices, each utility line would be subject to removal, relocation, or protection in place. The new H2 fueling, maintenance, and general operations of the ZEMU train vehicle may require increased utility and service demands, resulting in potentially significant impacts. Therefore, a potentially significant impact is anticipated for this resource area in the absence of mitigation and would require further analysis in the EIR.
- b) **No Impact.** The Project would not create additional water demands. The existing AMF has sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. No impact would result.
- c) **No Impact.** The Project would not increase the generation of sanitary sewer flows beyond the existing AMF operations. No impact would result.
- d) **No Impact.** The Project would generate minor amounts of solid waste that would be disposed of in accordance with state and local requirements. No impact would result.
- e) **No Impact.** See Response XIX(d).



XX. Wildfire

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

This analysis incorporates (by reference) SBCTA's certified EIR for DSBPRP (State Clearinghouse Number 2011051024). The previously certified EIR considered the impacts of constructing and operating IEMF on existing wildfire hazards and is included in Appendix A. As provided below, the impacts of the Project are generally within the scope of, and adequately analyzed in, the certified EIR pursuant to the requirements of CEQA. No mitigation measures were previously adopted by SBCTA.

- a) **Less than Significant Impact.** The proposed Project is within 1.25 mile of two San Bernardino Fire Stations (Fire Station 221 at 200 East Third Street and Fire Station 222 at 1201 West Ninth Street). Temporary impacts on local traffic patterns may result due to construction causing traffic delays, specifically construction deliveries to the Project site. These deliveries would be short-term or one-time events. In addition, implementation of a TMP, if needed, and preconstruction coordination with emergency responders would minimize impacts. Construction and operation of the Project would be in accordance with all applicable state and local requirements regarding any emergency response or evacuation plan. Therefore, a less than significant impact is anticipated for this resource area, and no further analysis is required.
- b) **Less than Significant Impact.** As previously identified, the proposed Project is currently zoned for Industrial Heavy and surrounded by commercial and industrial areas. In addition, the proposed Project site is relatively flat and away from hillside areas of the City of San Bernardino that are prone to wildfires. The proposed Project would be subject to state and local regulations related to wildfires and fire protection. Therefore, a less than significant impact is anticipated for this resource area, and no further analysis is required.

- c) **Less than Significant Impact.** The proposed Project would require improvements and modifications of a planned maintenance facility (AMF) within SBCTA property to accommodate ZEMU train service, including the construction of related ZEMU facilities. Improvement of existing utilities is proposed as a part of the Project; however, no new infrastructure is required. Therefore, a less than significant impact is anticipated for this resource area, and no further analysis is required in the EIR.
- d) **Less than Significant Impact.** The proposed Project is located within relatively flat, developed land. During construction, temporary alterations in drainage patterns may occur. Compliance with the NPDES General Construction Permit and erosion and stormwater control, as required by a SWPPP, would minimize downstream run-off impacts. As previously discussed within Section VII, Geology and Soils, of this IS, the proposed Project is not susceptible to landslide risk. Therefore, less than significant impact is anticipated for this resource area, and no further analysis is required.

XXI. Mandatory Findings of Significance

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

Impact Analysis

This analysis incorporates (by reference) SBCTA's certified EIR for DSBPRP (State Clearinghouse Number 2011051024). The previously certified EIR considered the cumulative impacts of constructing and operating IEMF, along with other near- and long-term projects, and is included in Appendix A. As provided below, the impacts of the Project are generally within the scope of, and adequately analyzed in, the certified EIR, pursuant to the requirements of CEQA. Mitigation Measures, as presented in Tables I through XX of this IS, were previously adopted by SBCTA to minimize, reduce, and/or avoid potentially significant impacts of DSBPRP.

- a) **Less than Significant.** As discussed in Section IV, Biological Resources, of this IS, the proposed Project is located within the previously approved DSBPRP footprint and is not anticipated to support special-status species, sensitive plant species or wildlife, or migratory birds. The proposed Project would be in close proximity to the Santa Fe Depot, listed on the National Register of Historic Places. However, proposed Project improvements are anticipated to significantly impact or eliminate important examples of the major periods of California history or prehistory.

- b) **Potentially Significant Impact Unless Mitigation Incorporated.** Cumulative impacts were evaluated for each of the environmental issue areas in Chapter 3 of the DSBPRP EIR. However, the proposed Project would be contained to a relatively limited area within the previously analyzed DSBPRP footprint. The proposed Project would be required to comply with mitigation requirements identified within the EIR. With Project-specific mitigation, it is anticipated that cumulative effects would be less than significant. Further analysis would be included in the EIR.
- c) **Less than Significant Impact.** Any effects related to construction of the proposed Project would be temporary and short term and would not result in any long-term or permanent effects on human beings. All potential effects that could result in substantial exposure of persons to hazards during construction of the Project are addressed in Section IX, Hazards and Hazardous Materials, of this IS.

Operation of the proposed Project would not result in the exposure of persons to any substantially adverse natural or human-made hazards that could directly or indirectly cause substantial adverse effects on human beings, such as geologic hazards, air emissions, noise, hazardous materials, or flooding. There would not be any long-term environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly. Therefore, a less than significant impact has been identified for this issue area.

References

California Department of Transportation (Caltrans). 2011. California Scenic Highway Mapping System. Accessed February 2021.

http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/.

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Appendix A. Revised Environmental Assessment/Final Environmental Impact Report for the Downtown San Bernardino Passenger Rail Project

(State Clearinghouse No. 2011051024)

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