

**Addendum to the Final Initial Study/Mitigated Negative
Declaration for the Snow Drop Road Street Improvement Project
(SCH No. 2019011045)**

Prepared for:

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OCTOBER 2020

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APPENDIX

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
ACOE	U.S. Army Corps of Engineers
CAGN	coastal California gnatcatcher
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CNDDDB	California Natural Diversity Database
County	County of San Bernardino
dBA	A-weighted decibel
GIS	geographic information system
IS	Initial Study
MCV	Manual of California Vegetation
MM	Mitigation Measure
MND	Mitigated Negative Declaration
NAHC	Native American Heritage Commission
project	Snow Drop Road Street Improvement Project
RAFSS	Riversidean alluvial fan sage scrub
ROW	right-of-way
RWQCB	Regional Water Quality Control Board
SDD	Special Districts Department
SWPPP	stormwater pollution prevention plan
USFWS	U.S. Fish and Wildlife Service
VMT	vehicle miles traveled

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1 Introduction

1.1 Project Background

The County of San Bernardino (County) Board of Supervisors formally adopted an Initial Study (IS)/Mitigated Negative Declaration (MND) for the Snow Drop Road Street Improvement Project (project) on March 19, 2019 (State Clearinghouse No. 2019011045). The project consists of improvements to approximately 2.1 miles of roadway and associated drainage improvements. The IS/MND was prepared pursuant to the California Environmental Quality Act (CEQA) and contains a disclosure and analysis of potential environmental effects associated with implementation of the approved project. On March 19, 2019, the Board of Supervisors also adopted a Mitigation Monitoring and Reporting Program for the project and approved the project as defined in the IS/MND.

Upon adoption of the IS/MND and approval of the project in 2019, the County Special Districts Department (SDD) released bid documents for the construction of the approved project. Shortly after the release of the bid documents, new design conflicts were raised by the project engineers regarding their coordination with utility agencies and review of the easements required for construction. The SDD determined that cancellation of the bid was necessary to minimize potential construction conflicts that would come at considerable additional cost after award of the contract was made and experienced during construction. The County Board of Supervisors approved a revised bid on October 22, 2019, and extended the bid opening to the end of February 2020. Upon opening of construction bids, an analysis was conducted by SDD staff between final planned project costs and the Assessment District funding, including any necessary mitigation requirements. An initial review of the project mitigation measures was completed by Dudek in June 2020. The review recommended an addendum to the IS/MND to note that the project would not result in impacts to a sensitive natural community under CEQA and would not result in adverse effects to coastal California gnatcatcher (*Polioptila californica californica*) (CAGN), and therefore, Mitigation Measure (MM) BIO 2 would not apply to the project. As such, the purpose of this Addendum is to evaluate changes to the project's IS/MND and determine if these changes cause new impacts not previously disclosed or analyzed.

1.2 California Environmental Quality Act Compliance

The California Code of Regulations, Title 14, Section 15000 et seq. (CEQA Guidelines) discuss a lead agency's responsibilities in handling new information when changes to a project occur after a negative declaration is certified. Section 15164(b) of the CEQA Guidelines states the following:

An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

Section 15162 of the CEQA Guidelines provides that preparation of a subsequent negative declaration is required only under the following circumstances:

- (a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
 - (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant

- environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
 - (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

As further discussed in Section 3 of this Addendum, no changes have been proposed to the project since approval of the IS/MND in March 2019, which would result in new significant impacts, substantial increases in previously identified significant impacts, or the requirement for new mitigation measures to be studied. Therefore, an addendum, rather than a subsequent negative declaration, is appropriate. In addition, and in accordance with CEQA Guidelines Section 15164(c), the addendum need not be circulated for public review, but may simply be attached to the Final IS/MND.

CEQA Guideline Revisions

The Notice of Availability and Notice of Intent to Adopt the MND was released on January 22, 2019, via the project's website and copies were made available at the SDD Headquarters and Archibald Library. Around the time of the release of the IS/MND, the state adopted a series of updates to the CEQA Guidelines to add efficiency and clarity to aspects of the guidelines and to incorporate new case law and legislation.¹ The updates included revisions to Appendix G of the CEQA Guidelines, which consists of environmental checklist questions that are used by many lead agencies as the framework for environmental documents prepared pursuant to CEQA. The recent updates to Appendix G can be summarized as follows: narrowing the scope of aesthetic impacts; moving the topic of paleontology from the cultural resources section to the geology section; adding threshold questions to address the topic of energy; expanding wildfire issues; combining airport safety and noise into one threshold question; deleting the reference to private airstrips; incorporating vehicle miles traveled (VMT) analysis into the transportation section; making the hydrology and utilities questions more concise and applicable to modern issues; clarifying that land use conflicts must relate to a physical impact; and adding "unplanned" to the population growth question, so that the question now focuses only on unplanned growth.

¹ Revisions to the CEQA Guidelines were adopted on December 28, 2018.

The environmental checklist questions used in the approved IS/MND are based on the version of Appendix G that was in place prior to the December 28, 2018, update. Section 15007(d) of the CEQA Guidelines states that “Public agencies shall comply with new requirements in amendments to the Guidelines beginning with the earlier of the following two dates: (1) The effective date of the agency’s procedures amended to conform to the new Guideline amendments; or (2) The 120th day after the effective date of the Guideline amendments.” The County does not formally adopt changes made to the CEQA Guidelines or environmental checklist at a public hearing. Rather, the County conformed to the new guideline amendments on the 120th day after the effective date of the guideline amendments, which was April 27, 2019 (Bruckhart pers. comm. 2020). Because the IS/MND for the project was released for public review before the County conformed to the new guidelines amendments and before the 120th day after the effective date of the guidelines amendment, the analysis in this Addendum does not need to be updated to conform with the revised guidelines. As such, changes pertaining to the CEQA Guidelines updates do not need to be addressed in this Addendum. For these reasons, no revisions are required in the CEQA analysis of the project as a result of the CEQA Guidelines updates. The recent adoption of these updates does not constitute substantial changes with respect to the circumstances under which the project will be undertaken, nor does it constitute new information of substantial importance that would change the impact conclusions in the adopted IS/MND.

1.3 Project Location and Setting

The project is located within the City of Rancho Cucamonga sphere of influence, in unincorporated San Bernardino County. Specifically, the project is located on approximately 1.3 miles of Snow Drop Road between Archibald Avenue to the west and Haven Avenue to the east, approximately 0.5 miles of Archibald Avenue south of Snow Drop Road, and approximately 0.3 miles of Haven Avenue south of Snow Drop Road. As one travels north along Archibald Avenue there are three rural residential lots located off of Archibald Avenue; continuing along Archibald Avenue, heading east turning into Santina Street there are two rural residential lots located off of Santina Street; continuing along Santina Street heading north and turning into Snow Drop Road heading east, there are seven rural residential units located off of Snow Drop Road; continuing along Snow Drop Road, heading south, turning into Haven Avenue, is a water tower to the east. The primary existing land uses surrounding the project consists of undisturbed vacant land.

1.4 Project Description

As described in the IS/MND approved in March 2019, the project consists of improvements to approximately 2.1 miles of roadway and associated drainage improvements. These improvements would be to Snow Drop Road from Archibald Avenue to the west and Haven Avenue to the east, Archibald Avenue south of Snow Drop Road, and Haven Avenue south of Snow Drop Road. Currently, portions of the existing roadway are partially paved. The purpose of the project is to improve the conditions of these roadway segments to provide adequate access for the residents in the project vicinity. Improvements involve paving or repaving within the project roadway segments (up to 26 feet wide), installation of metal guard rails along portions of the project roadway, and installation of drainage culverts to convey stormwater under the roadway. Four Arizona crossings will also be constructed in Snow Drop Road. An Arizona crossing is a roadway crossing that allows water to overflow directly onto the roadway during storm events and includes drainage culverts under the road to convey stormwater across. Drainage culverts are included in the project design of the Arizona crossings.

1.5 Format and Content of this Addendum

The following components comprise this Addendum:

Section 1, Introduction: This section provides the project background, discusses how an addendum is the appropriate CEQA documentation, provides the project location, setting, and project description, explains the contents of this Addendum, and concludes with how this Addendum will be used.

Section 2, Summary of Findings: This section serves to compare the findings made pursuant to the previously approved IS/MND and compares it to the findings made pursuant to Section 3, Environmental Checklist, of this Addendum. This section also serves to outline the changes to the previously approved IS/MND.

Section 3, Environmental Checklist: This section evaluates the environmental checklist for each resources area previously analyzed in the IS/MND. For each resource area, this section includes the Environmental Analysis, which evaluates the findings of the analysis in the previously approved IS/MND; the Changes in Circumstance/New Information, which describes any substantial changes that have occurred since the time the IS/MND was approved that could change the impact conclusions in the previously approved IS/MND; and a conclusion statement.

SDD prepared the project's Environmental Checklist per CEQA Guidelines Sections 15063(d)(3) and 15168(c)(4). Appendix G of the CEQA Guidelines includes a suggested checklist to indicate whether the conditions set forth in Section 15162, which would require a subsequent negative declaration, are met and whether there would be new significant impacts resulting from the project not examined in the Final IS/MND. Following the checklist, Sections 3.1 through 3.21 include an explanation and discussion of each significance determination made in the checklist.

For this Addendum, the following four possible responses to each of the individual environmental issue areas are included in the checklist:

1. **New Significant Impact.** This response is used to indicate when the project has changed to such an extent that major revisions to the Snow Drop Road Street Improvement Project IS/MND are required due to the presence of new significant environmental effects.
2. **More Severe Impacts.** This response is used to indicate when the circumstances under which the project is undertaken have changed to such an extent that major revisions to the Snow Drop Road Street Improvement Project IS/MND are required because the severity of previously identified significant effects would substantially increase.
3. **New Ability to Substantially Reduce Significant Impact.** This response is used to show when new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the Snow Drop Road Street Improvement Project IS/MND was approved; it would pertain if there are new mitigation measures or alternatives available to substantially reduce significant environmental impacts of the project.
4. **No Substantial Change from Previous Analysis.** This response is used to indicate that the project would not create a new impact or substantially increase the severity of the previously identified environmental impact disclosed in the Snow Drop Road Street Improvement Project IS/MND.

The Environmental Checklist and accompanying explanation of checklist responses provide the information and analysis necessary to assess relative environmental impacts of the project in the context of environmental impacts addressed in the project IS/MND.

Section 4, References and Preparers: This section includes references cited in the Addendum and a list of preparers.

1.6 Preparation and Processing of this Addendum

SDD directed and supervised the preparation of this Addendum. Although prepared with assistance from the consulting firm Dudek, the content contained in, and the conclusions drawn by, this Addendum reflect the sole independent judgment of SDD.

This Addendum will be forwarded, along with the previously approved IS/MND, to the County Board of Supervisors for review as part of its deliberations concerning the proposed project. A public hearing will be held to evaluate the proposed project and the adequacy of this Addendum. Public comments will be heard at this hearing. At the conclusion of the public hearing, the County Board of Supervisors may provide a decision as to whether to approve, approve with modifications, or deny approval of the proposed project. If approved, the decision-making body will adopt findings relative to the proposed project's environmental impacts.

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2 Summary of Findings

The purpose of this Addendum is to evaluate changes to the project and determine if these changes cause new impacts not previously disclosed or analyzed. Section 2.1, Findings from the Previously Approved IS/MND, summarizes the findings made in the previously approved IS/MND, including impacts determined to be less than significant, impacts determined to be potentially significant absent mitigation, and mitigation measures identified. Section 2.2, Findings from this Addendum, summarizes the findings made in Section 3 of this Addendum, including any changes from those findings made in Section 2.1.

2.1 Findings from the Previously Approved Initial Study/Mitigated Negative Declaration

Impacts Determined to be Below a Level of Significance

The previously approved IS/MND determined that the project would result in no impact or in less-than-significant impacts for the following environmental issue areas: aesthetics, agriculture and forestry resources, air quality, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, and utilities and service systems.

Impacts Determined to be Potentially Significant

According to the previously approved IS/MND, impacts related to biological resources, cultural resources, noise, traffic and transportation, and tribal cultural resources were determined to be potentially significant absent mitigation. The following mitigation measures were provided for the approved IS/MND to reduce these impacts:

MM BIO 1. Nesting Bird Surveys: The Project's construction shall not occur between February 15 and September 1 to avoid potential impacts to nesting birds or raptors. If construction cannot be avoided during the period of February 16 to August 31, a qualified biologist shall conduct a nesting bird survey of potentially suitable nesting vegetation prior to construction initiation. Such surveys shall be conducted no more than (3) days prior to initiation of grading to document the presence or absence of nesting birds within or directly adjacent (100 feet) to the study area. If ground disturbance is not conducted within three days of a negative survey, the nesting survey must be repeated to confirm the absence of nesting birds. If active nests are identified, species specific measures shall be prepared by a qualified biologist and implemented to prevent abandonment of the active nest. At a minimum, grading in the vicinity of a nest shall be postponed until the young birds have fledged. A minimum exclusion buffer of 100 feet shall be maintained during construction, depending on the species and location. The perimeter of the nest setback zone shall be fenced or adequately demarcated with stakes and flagging at 20-foot intervals, and construction personnel and activities restricted from the area. A survey report by a qualified biologist verifying that no active nests are present, or that the young have fledged, shall be submitted to the County of San Bernardino prior to initiation of grading in the nest-setback zone. The qualified biologist shall serve as a biological monitor during those periods when construction activities occur near active nest areas to ensure that no inadvertent impacts on these nests occur. A final report of the findings, prepared by a qualified biologist, shall be

submitted to the County of San Bernardino prior to construction-related activities that have the potential to disturb any active nests during the nesting season.

MM BIO 2. Riversidean alluvial fan sage scrub Conservation: To reduce the potential direct and indirect impacts to coastal California gnatcatcher (CAGN) from the loss of mature Riversidean alluvial fan sage scrub (RAFSS) habitat, the loss of 1.51 acres of mature RAFSS shall be mitigated at a minimum 3:1 ratio through one or a combination of the following, as agreed to by the USFWS and the permitting agencies in the permitting process and through Section 7 consultation:

- a. Purchase mitigation credits with an approved mitigation bank for the preservation and/or restoration of mature RAFSS habitat at least a 3:1 ratio for permanent impacts.
- b. Payment into an approved in-lieu fee program for the preservation and/or restoration of mature RAFSS habitat at least a 3:1 ratio for permanent impacts.
- c. Conservation of land containing mature RAFSS habitat on at least 3:1 ratio for permanent impacts.

MM BIO 3. Jurisdictional Drainages: The Project will temporarily impact 0.0848 acres and permanently impact 0.0778 acres of USACE and RWQCB waters of the U.S. and State and temporarily impact 0.0934 acres and permanently impact 0.148 acres of CDFW streambed and associated riparian habitat. As mitigation for the impacts, the Department proposes to do either one or a combination of the following, as agreed to by the Department and the permitting agencies in the permitting process

- a. Secure off-site acreage of biologically equal or greater value for permanent conservation on at least a 1:1 ratio basis for temporary impacts and 2:1 ratio for permanent impacts.
- b. Pay fees or purchase mitigation credits to an appropriate mitigation bank for the restoration and permanent conservation of habitat at least a 1:1 ratio basis for temporary impacts and 2:1 ratio for permanent impacts.
- c. Restore on-site habitat on at least a 1:1 ratio basis for temporary impacts and 2:1 ratio for permanent impacts.

MM BIO 4. Regulated Trees: If direct or indirect impacts to regulated trees pursuant to Section 88.01.040 of the San Bernardino County Development Code cannot be designed to avoid removal, a certified arborist, horticulturist, or registered landscape architect familiar with the County of San Bernardino's Development Code for regulated trees shall conduct an assessment of the trees proposed for removal within the entire study area. If required, a permit application will be submitted for review and approval by the County of San Bernardino.

MM CR 1. Inadvertent Discovery of Historical, cultural, or archaeological Resources. If buried materials of historical, cultural, or archaeological significance are accidentally discovered during any earth-moving operations associated with the proposed Project, all work in the immediate vicinity (within a 60 foot buffer) shall cease until a qualified archaeologist meeting Secretary of Interior standards can evaluate the nature and significance of the finds. If the find is determined to be an historical or unique archaeological resource, as defined in Section 15064.5 of the California Code of Regulations (State CEQA Guidelines), avoidance or other appropriate measures shall be implemented. Additionally, the Morongo band of Mission Indians and the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed within MM TCR 1, if any such find occurs and be provided information after the archaeologist makes his/her

initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. If significant Native American cultural resources, as defined by CEQA, are discovered and cannot be avoided, a Monitoring and Treatment Plan shall be developed by the qualified Project archaeologist and provided to the Tribes for review and comment, as detailed within MM TCR 1. The qualified Project archaeologist shall monitor and implement the Monitoring and Treatment Plan accordingly.

- MM CR 2. Inadvertent Paleontological Discovery.** If any paleontological resources are exposed during ground excavation disturbance, ground disturbance activities in the vicinity of the discovery will be terminated immediately and a qualified paleontological resources specialist will be retained to evaluate the resources. If the find is determined to be significant, avoidance or other appropriate measures as identified by the paleontologist shall be implemented. Appropriate measures would include that a qualified paleontologist be permitted to recover, evaluate and curate the find(s) in accordance with current standards and guidelines.
- MM CR 3. Inadvertent Discovery of Human Remains.** Per State Health and Safety Code 7050.5, if human remains are encountered during construction, no further disturbance shall occur in the immediate vicinity (within a 100-foot buffer) until the San Bernardino County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The San Bernardino County Coroner must be notified within 24 hours. If the County Coroner determines that the remains are not historic, but prehistoric, the Native American Heritage Commission (NAHC) must be contacted to determine the most likely descendent for this area. Once the most likely descendent is determined, treatment of the Native American human remains will proceed pursuant to Public Resources Code Section 5097.98.
- MM Noise 1. Stationary Noise-generating Equipment:** During Project construction, stockpiling, stationary noise-generating equipment and vehicle staging areas shall be located as far as is practicable from any existing structure designed for human occupancy.
- MM Noise 2. Construction Hours:** In locations where construction activities occur within one-quarter mile of any existing structure designed for human occupancy, construction activities shall be limited to between the hours of 7:00 a.m. and 7:00 p.m., Monday through Saturday. Construction during other periods, including Sundays and holidays, shall be limited to emergencies and activities determined to be in the interest of the general public. If nocturnal construction is planned or required to minimize traffic interference, and if any occupied structures exist within one-half mile, a requested exemption to the above time constraints shall be submitted to the San Bernardino County Special Districts Department. The San Bernardino County Special Districts Department shall confirm that such operations are not detrimental to the health, safety, and welfare of the noise receptors prior to authorizing construction outside of the time constraints listed above.
- MM Noise 3. Equipment Noise:** All construction equipment shall be operated with mandated noise control equipment (i.e., mufflers or silencers).
- MM Noise 4. Noise complaints:** The County shall respond to any noise complaints received for this Project by measuring noise levels at the affected receptor site. If the monitored noise level exceeds 65 dBA CNEL exterior or 45 dBA CNEL interior at the receptor, the construction contractor shall implement adequate measures (which may include portable sound attenuation walls, use of quieter

equipment, shift of construction schedule to avoid the presence of sensitive receptors, etc.) to reduce noise levels to the greatest extent feasible. Any monitoring shall be conducted by a qualified acoustical firm under contract with the construction contractor and responsible to the County

MM Trans 1. Phase Construction Activities: The construction contractor shall phase the construction activities to minimize obstruction of through traffic lanes.

MM Trans 2. Traffic Control Plans: The construction contractor shall provide adequate traffic management resources, as determined by the County and City of Rancho Cucamonga, to ensure adequate access to all occupied properties on a daily basis, including emergency access. A construction traffic management plan shall be prepared and approved by the City of Rancho Cucamonga County, prior to initiation of construction within the Project. The plan can include the following components: protective devices, flag person(s) or police assistance for traffic control, to maintain safe traffic flow on local streets affected by construction at all times.

MM TCR 1. Inadvertent Tribal Cultural Resource Discovery: The Morongo Band of Mission Indians (MBMI) and San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed in MM CR 1, of any Native American cultural resources discovered during any earthmoving operations associated with the proposed Project, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a cultural resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with the MBMI and SMBMI, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents both MBMI and SMBMI for the remainder of the Project, should MBMI and/or SMBMI elect to place a monitor onsite. Any and all archaeological/cultural documents created as a part of the Project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the County for dissemination to SMBMI. The County shall, in good faith, consult with SMBMI throughout the life of the Project.

2.2 Findings from this Addendum

Changes Being Proposed

As described in Section 3, Environmental Checklist, changes with respect to substantial adverse effect to species identified as a candidate, sensitive, or special status species and substantial adverse effect on any riparian habitat or other sensitive natural community would occur.

The previously approved IS/MND determined impacts to one species listed as federally threatened, CAGN would occur as a result of the project and MM BIO 2 would be required to reduce impacts to less than significant. However, direct impacts to CAGN would be avoided through the construction approach of the project and indirect impacts to CAGN would not occur because removal of a narrow linear strip of habitat would not result in substantial adverse effects to CAGN, as described in further detail in Section 3.4, Biological Resources. In addition, MM BIO 2 proposed compensatory-type mitigation for RAFSS; however, the previously approved IS/MND does not discuss whether the loss of mature RAFSS habitat would result in adverse effects to CAGN, thereby triggering the need for compensatory mitigation. Therefore, MM BIO 2 would no longer apply to the project as impacts to CAGN are now considered less than significant. No mitigation measures for reducing impacts to CAGN would be required.

With respect to riparian habitat or other sensitive natural community, the previously approved IS/MND determined that one plant community identified within the project study area, RAFSS is a sensitive vegetation community identified by the California Department of Fish and Wildlife (CDFW). The previously approved IS/MND determined direct impact to 1.51 acres of this plant community would result in potentially significant impacts, and implementation of MM BIO 2, would mitigate the loss of mature RAFSS at a minimum ratio of 3:1 to reduce impacts to sensitive natural communities to less-than-significant levels. However, for the reasons described in Section 3.4, Biological Resources, including reference to existing studies, mapping of floodplains, the species composition of the area, and the absence of scouring, the on-site community does not meet the definition of RAFSS as described by the County as a sensitive community. As this community is not a sensitive community under CEQA, impacts to sensitive communities would not occur. Impacts would be less than significant, and no mitigation measure is required.

Findings

As with the previously approved ISMND, this Addendum found that the project would result in no impact or in less-than-significant impacts for the following environmental issue areas: aesthetics, agriculture and forestry resources, air quality, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, and utilities and service systems.

Impacts related to biological resources, cultural resources, noise, traffic and transportation, and tribal cultural resources were determined to be potentially significant absent mitigation. All mitigation measures, with the exception of MM BIO 2, which would no longer apply for the reasons described above, would reduce these impacts.

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3 Environmental Checklist

1. Project title:

Snow Drop Road Street Improvement Project

2. Lead agency name and address:

County of San Bernardino Special Districts Department
222 West Hospitality Lane, 2nd Floor
San Bernardino, California 92415-0450

3. Contact person and phone number:

Moe Yousif, Senior Project Manager
County of San Bernardino Department of Public Works, Special Districts
909.386.8820
moe.yousif@sdd.sbcounty.gov

4. Project location:

The project is located within the City of Rancho Cucamonga sphere of influence, in unincorporated San Bernardino County. Specifically, the project is located on approximately 1.3 miles of Snow Drop Road between Archibald Avenue to the west and Haven Avenue to the east, approximately 0.5 miles of Archibald Avenue south of Snow Drop Road, and approximately 0.3 miles of Haven Avenue south of Snow Drop Road.

5. Project sponsor's name and address:

County of San Bernardino, Department of Public Works, Special Districts
222 West Hospitality Lane, 2nd Floor
San Bernardino, California 92415-0450

6. General plan designation:

Snow Drop Road and the project's portions of Archibald and Haven Avenues are not yet classified on the San Bernardino County Official Land Use Plan, General Plan, Circulation and Transportation Map. The majority of the proposed project is located within existing public rights-of-way (ROWs); however, there are areas where ROW will need to be acquired. Property adjacent to the proposed project is designated as Rural Living (RL), Single Residential (RS), and Special Development (SD-RES) by the County of San Bernardino 2007 General Plan Land Use Plan.

The project is also located within the City of Rancho Cucamonga sphere of influence. The Rancho Cucamonga General Plan does not include roadway classification for the proposed project. Property adjacent to the proposed project is designated as Hillside Residential, Open Space, and Flood Control/Utility Corridor by the Rancho Cucamonga General Plan.

7. Zoning:

The majority of the project is within existing public ROW; however, there are areas of the project for which ROW will be acquired. The San Bernardino County General Plan utilizes a single map showing both the General Plan land use designations and zoning classifications to assure there is always consistency between the two. Therefore, the land use designations provided above are also the zoning classifications. As stated above, property adjacent to the project is designated as Rural Living (RL), Single Residential (RS), and Special Development (SD-RES) by the San Bernardino County General Plan.

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

The project consists of improvements to approximately 2.1 miles of roadway and associated drainage improvements. These improvements will be to Snow Drop Road from Archibald Avenue to the west and Haven Avenue to the east, Archibald Avenue south of Snow Drop Road, and Haven Avenue south of Snow Drop Road. Currently, portions of the existing roadway are partially paved. The purpose of the project is to improve the conditions of these roadway segments to provide adequate access for the residents in the project vicinity. Improvements involve paving or repaving within the project roadway segments (up to 26 feet wide), installation of metal guardrails along portions of the project roadway, and installation of drainage culverts to convey stormwater under the roadway. Four Arizona crossings will also be constructed in Snow Drop Road. An Arizona crossing is a roadway crossing that allows water to overflow directly onto the roadway during storm events and includes drainage culverts under the road to convey stormwater across. Drainage culverts are included in the project design of the Arizona crossings.

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

As one travels north along Archibald Avenue there are three rural residential lots located off of Archibald Avenue; continuing along Archibald Avenue, heading east turning into Santana Street there are two rural residential lots located off of Santana Street; continuing along Santana Street heading north and turning into Snow Drop Road heading east, there are seven rural residential lots located off of Snow Drop Road; continuing along Snow Drop Road, heading south, turning into Haven Avenue, is a water tower to the east. The primary existing land uses surrounding the project consists of undisturbed vacant land.

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

- State Agencies
 - CDFW: Permit under Section 1602 of Fish and Game Code
 - California Regional Water Quality Control Board: Permit under Section 401 of the Clean Water Act
- City/County Agencies
 - County of San Bernardino Public Works: Encroachment Permit
 - County of San Bernardino Flood Control District: Potential Encroachment Permit
 - City of Los Angeles Department of Water and Power: Potential Encroachment Permit

- 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.?**

Pursuant to Assembly Bill 52, SDD provided “Notice of Opportunity to Consult” letters dated June 11, 2018, to tribes identified by the Native American Heritage Commission (NAHC) that have tribal lands or cultural places within the area. Letters were sent certified mail with return receipt requested from the Department to 10 tribes: Gabrieleño Band of Mission Indians-Kizh Nation, Gabrieleño/Tongva San Gabriel Band of Mission Indians, Gabrielino/Tongva Nation, Gabrielino Tongva Indians of California Tribal Council, Gabrielino Tongva Tribe, Morongo Band of Mission Indians, Pauma Band of Luiseno Indians – Pauma and Yulma Reservation, San Fernando Band of Mission Indians, San Manuel Band of Mission Indians, and Serrano Nation of Mission Indians. Follow-up phone calls and correspondence were made on June 21, July 10, and August 9, 2018.

The following tribes responded in writing to the Department’s Assembly Bill 52 request for input:

- San Manuel Band of Missions Indians
- Morongo Band of Mission Indians

Both tribes requested to be consulted in the event of inadvertent finds and provided standard language to use in the Department’s conditions and/or mitigation measures. MM CR 1, MM CR 3, and MM TCR 1 are proposed herein and have incorporated the tribe’s request.

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that would result in a determination of either “More Severe Impact” or “New 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"/> Geology and Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards and Hazardous Materials | <input type="checkbox"/> Hydrology and Water Quality |
| <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources | <input type="checkbox"/> Utilities and Service Systems |
| <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 proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☒ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further beyond this Addendum to the previously approved IS/MND.

Signature

Date

3.1 Aesthetics

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
I. AESTHETICS/SHADOWS – 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 buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Produce extensive shadows affecting adjacent uses or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Analysis

No Substantial Change from Previous Analysis. The previously approved IS/MND determined the project would result in no impacts related to aesthetics and no mitigation measures were required. There are no proposed changes to the location of the project and no changes to the existing condition of the project site have occurred since the release of the previously approved IS/MND. As previously analyzed, the project includes roadway and drainage improvements to partially paved roads that are currently in use. The project is not a designated scenic corridor as shown in the San Bernardino County General Plan Open Space Element Map (County of San Bernardino 2007). Additionally, the project site is neither a state highway nor an official California scenic highway, as shown on the San Bernardino County General Plan Circulation and Transportation Map (County of San Bernardino 2007). The project does not propose any sizeable features that would substantially change the existing visual character of the project or its surroundings. Further, the project does not include any new sources of substantial light or glare. Construction work would be limited to daytime hours; thereby eliminating the need for construction lighting. As such, the project as analyzed herein would not result in new significant impacts to aesthetics, nor would it result in substantial increases in the severity of impacts or the need for new mitigation measures.

Changes in Circumstance/New Information

Since approval of the IS/MND, no substantial changes in the aesthetic or visual environment in the project area have occurred. Similarly, no topographical changes or other landform alterations have occurred that would fundamentally change the approach or conclusions of the aesthetics analysis in the previously approved IS/MND. Additionally, there are no changes in regulations or design standards that have been implemented since the previously approved IS/MND that would alter the conclusions or the analysis in the category of aesthetics. As such,

there are no substantial changes with respect to circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to aesthetics that would change the impact conclusions in the previously approved IS/MND.

Conclusion

In conclusion, no new or more severe impacts associated with aesthetics would occur, and the level of impact would not change from the level identified in previously approved IS/MND. No new mitigation measures are required.

3.2 Agriculture and Forestry Resources

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
II. AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<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(g))?	<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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Analysis

No Substantial Change from Previous Analysis. The previously approved IS/MND determined the project would result in no impacts related to agricultural resources and no mitigation measures were required. There are no proposed changes to the location of the project and no changes to the existing condition of the project site have occurred since the release of the previously approved IS/MND. The project site does not include Farmland or other farmland of local importance as identified by California Department of Conservation (DOC 2016). The project site and surrounding areas are not zoned for agricultural use nor contain Williamson Act land conservation contracts (County of San Bernardino 2007). Additionally, the previously approved IS/MND determined the project area does not contain forest land and is not located within jurisdictional control of a national forest or national park. There would be no other changes that due to their location or nature, could result in the conversion of farmland or forest land to non-forest use. As such, the project as analyzed herein would not result in new significant impacts to agricultural resources, nor would it result in substantial increases in the severity of previously identified significant impacts or the need for new mitigation measures.

Changes in Circumstance/New Information

Since approval of the IS/MND, no substantial changes related to agricultural resources have occurred in the project area. Additionally, there have been no changes in zoning regulations or regulations related to forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g]). As such, there are no substantial changes with respect to circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to agricultural resources that would change the impact conclusions in the previously approved IS/MND.

Conclusion

In conclusion, no new or more severe impacts associated with agriculture and forestry resources would occur, and the level of impact would not change from the level identified in previously approved IS/MND. No new mitigation measures are required.

3.3 Air Quality

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management 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 type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Analysis

No Substantial Change from Previous Analysis. The previously approved IS/MND determined the project would result in no impacts related to conflict with an applicable air quality plan and less-than-significant impacts for all other air quality significance thresholds. The project as described herein (Section 1.4) would not result in any changes to the project description as previously described in the IS/MND. The project consists of improvements to approximately 2.1 miles of roadway and associated drainage improvements. As such, the construction equipment-type and duration previously analyzed, and the operational characteristics of the project would not change. As previously analyzed, the project would not result in any changes to the existing land use patterns in the project area, and no conflict with an applicable air quality plan would occur. The short-term construction emissions of criteria pollutants from the project were estimated using the California Emissions Estimator Model and were determined to not exceed South Coast Air Quality Management District's localized significance thresholds. The long-term operational emissions associated with the project would occur from infrequent vehicle trips associated with maintenance activities and would be negligible. Since the project would not conflict with existing land uses, and would not exceed South Coast Air Quality Management District's established thresholds, the project would not result in a net increase in criteria pollutant emissions. Additionally, the previously approved IS/MND found the short-term and operational emissions associated with the project would have a less-than-significant impact to sensitive receptors scattered adjacent to the roadway segments. Although the project presents the potential for generation of objectionable odors in the form of diesel exhaust during construction in the immediate vicinity of the project site, these construction odors would be short-term. As such, the project as analyzed herein would not result in new significant impacts to air quality, nor would it result in substantial increases in the severity of impacts or the need for new mitigation measures.

Changes in Circumstance/New Information

This addendum is being prepared after the CEQA amendments went into effect for the County (April 27, 2019). However, the revisions to the thresholds were minimal and do not have an appreciable effect on the analysis or the impact conclusions for this project. The revisions primarily involved combining the previous Thresholds B and C into a single threshold and expanding Threshold D to address "other emissions," rather than just odors. In addition, there are

no substantial changes with respect to the circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to air quality that has changed the impact conclusions in the previously approved IS/MND.

Conclusion

In conclusion, no new or more severe impacts associated with air quality would occur, and the level of impact would not change from the level identified in previously approved IS/MND. No new mitigation measures are required.

3.4 Biological Resources

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<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, 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"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 native 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"/>

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
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"/>

In preparation of this Addendum, Dudek conducted a desktop review of existing conditions of the project site using aerial photographs available on Google Earth, U.S. Geologic Survey topographic quadrangles, National Hydrography Dataset, and National Wetlands Inventory. Dudek also received geographic information system (GIS) shape files of the delineation of waters conducted by Albert A. Webb Associates and the vegetation communities mapped by Cadre Environmental. Using GIS software, the vegetation community mapping and delineation of jurisdictional waters shapefiles were overlain on aerial photographs and project topography to confirm accuracy. The design plans provided by SDD were also overlain in GIS with these shapefiles in order to confirm permanent and temporary impacts to these resources. In addition, Dudek biologist, Tommy Moolio, conducted a reconnaissance survey of the project site on Tuesday, June 2, 2020, to verify the vegetation communities mapping and delineation of jurisdictional waters as well as confirm the existing physical conditions of the site. Additionally, presence/absence focused surveys for the CAGN were conducted, and included as Appendix A, 2020 Focused California Gnatcatcher Survey 45-Day Report, in this Addendum.

Environmental Analysis

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

New Ability to Substantially Reduce Significant Impact. The previously approved IS/MND made the following conclusions regarding special-status species:

- **Special-Status Plants:** No special-status plant species were detected during the reconnaissance survey. No suitable habitat for sensitive plant species listed as federal or state threatened/endangered was documented within the study area. Six species of special-status plants that are not state or federally listed have a low potential to occur. Road improvement activities would not likely eliminate significant amounts of habitat for potentially occurring special-status plant species, reduce population size of sensitive plant species below self-sustaining levels on a local or regional basis, nor constitute a significant impact to any special-status plant species. Therefore, the project would not result in significant impacts to special-status plants, and the IS/MND does not require mitigation for special status plants.
- **Non-Listed Wildlife Species:** Nine special-status wildlife species that are not state or federally listed have a low or moderate potential to occur based on the presence of suitable habitat. Most of the species that have at least low occurrence potential to occur adjacent to the site were all deemed to be too widespread and common to warrant listing as threatened or endangered. Impacts to an

existing disturbed roadway and shoulders would not constitute a significant impact to any of these species, nor amount to a measurable impact within Southern California or their overall range. Therefore, it was determined the project would not result in significant impacts to special-status wildlife species, and the IS/MND does not require mitigation for special-status wildlife.

- **Listed Wildlife Species:** One species listed as federally threatened, CAGN, was documented within the study area. Therefore, all suitable CAGN habitat (4.8 acres) was surveyed to determine the current status of the species on site. Based on a focused protocol survey, CAGN are expected to infrequently utilize 1.02 acres of RAFSS in the southeastern region of the study area for foraging, movement, and breeding. The presence of CAGN and suitable RAFSS habitat would require consultation with U.S. Fish and Wildlife Service (USFWS) under Section 7 of the federal Endangered Species Act. Therefore, direct or indirect impacts to CAGN from the loss of mature RAFSS habitat would be mitigated through implementation of MM BIO 2 (listed under Section 2.1 of this Addendum).
- **Migratory Birds:** Construction of the project may require removal of vegetation (i.e., trees, shrubs, and ground cover) located adjacent to the roadway with the potential to support nesting migratory birds. Impacts to such species are prohibited under the Migratory Bird Treaty Act and California Fish and Game Code. Therefore, MM BIO 1 is required to avoid harm to migratory birds and their nests.

Special-Status Plants, Non-Listed Wildlife Species, and Migratory Birds

Based on the desktop review and reconnaissance survey, no changes would occur related to the characterization of special-status species with the potential to occur on site as well as with the significance statement for special-status plants, non-listed wildlife species, and migratory birds. The reconnaissance survey determined no special-status plants were present, no suitable habitat for sensitive plant species listed as federal or state threatened/endangered was documented, and non-listed wildlife species had low potential to occur (Appendix A).

The project as described herein (Section 1.4) would not result in any changes to the project description as previously described in the IS/MND. The project consists of improvements to approximately 2.1 miles of roadway and associated drainage improvements. As such, road improvement activities would not likely eliminate significant amounts of habitat for potentially occurring special-status plant species and non-listed wildlife species. In addition, the construction of 2.1 miles of roadway and associated drainage improvements would require MM BIO 1, as discussed in the previously approved MND, to ensure that migratory birds (and their nests) are not directly harmed. Further, the project would not result in any changes to the existing conditions or to the project description such that new or more severe impacts would occur related to special-status plants, non-listed special-status wildlife, and migratory birds.

Listed Wildlife Species

The previously approved IS/MND determined direct and indirect impacts to listed wildlife species (CAGN) from the loss of mature RAFSS habitat would be mitigated through implementation of MM BIO 2, which requires compensatory mitigation for RAFSS habitat as determined through consultation with the USFWS under Section 7 of the federal Endangered Species Act (Section 7 Consultation). However, with the adoption of the new Navigable Waters Protection Rule in June 2020, the project is no longer subject to Section 7 consultation. Additionally, focused surveys conducted for CAGN in 2020 were negative and, with the addition of best management practices including preconstruction surveys and monitoring, there would be no direct impacts to CAGN. Finally, as described in more detail below, indirect impacts to CAGN as a result

of the project are not expected. Due to the avoidance of take and impacts to CAGN, MM BIO 2 no longer applies with respect to CAGN mitigation.

The previously approved IS/MND included focused surveys for the CAGN, conducted in 2018. These surveys documented CAGN during two of the nine focused surveys. A single individual (juvenile) was documented within and adjacent to the southeast region of the study area. Due to the timing and limited observation of this individual, it was determined to be a migrating juvenile and CAGN were not documented breeding within the study area. In preparation of this Addendum, the presence/absence focused surveys for CAGN were conducted for the project between May 26, 2020, and June 30, 2020 (Appendix A). No CAGN (i.e., individuals and/or nests) were detected within the project survey areas in 2020. Therefore, the project site is currently considered absent of CAGN.

Take of CAGN, as defined by the federal Endangered Species Act, must be avoided or an incidental take permit must be obtained from USFWS. While the project is currently absent of CAGN, suitable habitat is present within and adjacent to the project area. To ensure avoidance of take of CAGN, construction activities would occur outside of the CAGN breeding season within and adjacent to CAGN suitable habitat. It is possible for non-breeding CAGN to be present year-round; therefore, a monitor will be present during construction activities within suitable CAGN habitat. The monitor will conduct pre-construction surveys to determine if CAGN are present in proximity to construction activities, stop construction activities if CAGN are detected, and confirm when CAGN are no longer present and construction activities can resume. With implementation of these measures, take of individuals of CAGN would be avoided.

Additionally, the project would not result in adverse modification of CAGN suitable habitat. The project would result in the removal of a narrow linear strip of habitat ranging from 10–20 feet wide adjacent to an existing road. The linear nature of the vegetation removed and its presence next to an existing road limits the potential for adverse effects to CAGN as a result of its removal. Additionally, ample habitat for CAGN is present contiguous to the strip being removed. For these reasons, the removal of up to 1.02 acres of habitat suitable for CAGN is not expected to result in substantial adverse effect to CAGN; therefore, impacts would be less than significant, and no mitigation related to CAGN habitat is required.

The previous IS/MND determined that the presence of CAGN and suitable RAFSS habitat would require consultation with USFWS under Section 7 of the federal Endangered Species Act. Previously, approval from the U.S. Army Corps of Engineers (ACOE) was required under Section 404 of the Clean Water Act; ACOE would have been obligated under Section 7 of the federal Endangered Species Act to consult with USFWS should there be effects on species federally listed as threatened or endangered. Based on the Navigable Waters Protection Rule released in April 2020, that went into effect on June 22, 2020, ephemeral waters are no longer protected waters of the United States; therefore, waters within the project are no longer regulated by ACOE. As such, consultation with USFWS under Section 7 of the federal Endangered Species Act is no longer required as part of the project.

A project applicant is obligated to obtain an Incidental Take Permit under Section 10 of the federal Endangered Species Act in the event there is the potential for take of a species federally listed as threatened or endangered. With the avoidance measures described above, the project is not expected to result in take of a listed species; therefore, an Incidental Take Permit under Section 10 of the federal Endangered Species Act is not required.

The project would not result in new significant impacts to biological resources, nor would it result in substantial increases in the severity of impacts or the need for new mitigation measures. Further, with implementation of avoidance measures, the project would not result in take of CAGN nor in adverse modification to CAGN habitat. Finally, due to recent changes in federal regulations, the project is not subject to a permit under Section 404 of the Clean Water and, therefore, consultation with the USFWS under Section 7 of the federal Endangered Species Act is no longer required. For these reasons, impacts to CAGN are reduced from the approved IS/MND and MM BIO 2 is no longer applicable to the project with respect to CAGN.

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

New Ability to Substantially Reduce Significant Impact. The previously approved IS/MND determined that one plant community identified within the project study area, RAFSS, is a sensitive vegetation community identified by CDFW. Approximately 1.51 acres of mature RAFSS habitat would be directly impacted by the project, and thus, impacts would be potentially significant. As such, implementation of MM BIO 2, would mitigate the loss of mature RAFSS at a minimum ratio of 3:1 to reduce impacts to sensitive natural communities to less-than-significant levels. However, as described in more detail below, the habitat on site does not meet the definition of RAFSS and, since the community on site is not a sensitive community as defined by CEQA, therefore, impacts are reduced from the IS/MND and MM BIO 2 does not apply.

In preparation of this Addendum, Dudek conducted a desktop review of the documented biological resources within the site and a reconnaissance survey of the site. As part of the review, Dudek completed a cross-walk of each of the vegetation communities identified in the Biological Resources Constraints Letter prepared by Cadre Environmental (Appendix B to the previously approved IS/MND) to the Manual of California Vegetation (MCV) (Sawyer et al. 2009) nomenclature, the standard accepted by CDFW (Table 1, Vegetation Community Cross Walk to Manual of California Vegetation).

Table 1. Vegetation Community Cross Walk to Manual of California Vegetation

Cadre Vegetation Community Name	MCV Vegetation Alliance Name	MCV Association Name	Rank
Arroyo willow tree	Arroyo willow thickets	<i>Salix lasiolepis</i>	G4S4
Mulefat scrub	Mulefat thickets	<i>Baccharis salicifolia</i>	G5S5
Coast live oak tree	Coast live oak woodland	<i>Quercus agrifolia</i>	G5S4
Coastal sage scrub	California sagebrush – California buckwheat scrub	<i>Artemisia californica</i> – <i>Eriogonum fasciculatum</i>	G4S4
Riversidean alluvial fan sage scrub	California sagebrush – California buckwheat scrub	<i>Artemisia californica</i> – <i>Eriogonum fasciculatum</i>	G4S4
Coastal sage scrub – black sage dominant	Black sage scrub	<i>Salvia mellifera</i> – <i>Eriogonum fasciculatum</i>	G4S4
Chamise chaparral	Chamise chaparral	<i>Adenostoma fasciculatum</i>	G5S5
Eucalyptus trees	Eucalyptus grove	NA	NA
Developed/disturbed	Developed/disturbed	NA	NA

Source: Cadre Environmental 2018.

Note: Cadre = Cadre Environmental; MCV = Manual of California Vegetation; NA = not applicable.

The Biological Resources Constraints Letter states that natural community names and hierarchical structure follows the MCV classifications; however, as shown in Table 1, the vegetation community names provided in the Biological Resources Constraints Letter are not consistent with the MCV. Based on this classification, the area identified as RAFSS in the Biological Resources Report is not a sensitive community as defined by CDFW.

CDFW provides the following guidance regarding determining sensitive communities (CDFW 2020):

1. Identify all Natural Communities within the project footprint using the best means possible, for example, keying them out in the Manual of California, Second Edition (Sawyer et al. 2009) or in classification or mapping reports from the region, available on VegCAMP's Reports and Maps page.
2. Refer to the current standard list of Natural Communities to determine if any of these types are ranked Sensitive (S1-S3 rank).
3. Other considerations when assessing potential impacts to Sensitive Natural Communities from a project include:
 - a. Compliance with state and federal wetland and riparian policies and codes, as certain Natural Communities are restricted to wetlands or riparian settings.
 - b. Compliance with the Native Plant Protection Act and the state and federal Endangered Species Acts, as some Natural Communities either support rare species or are defined by the dominance or presence of such species.
 - c. Compliance with CEQA Guidelines Section 15065(a), which mandates completion of an EIR if a project would threaten to eliminate a plant community.
 - d. Compliance with local regional plans, regulations, or ordinances that call for consideration of impacts to Natural Communities.
 - e. Vegetation types that are not on the state's sensitive list but that may be considered rare or unique to the region under CEQA Guidelines Section 15125(c).

As shown in Table 1, none of the vegetation communities within the project site have a rank of 1–3 and, therefore, do not meet the definition of a Sensitive Natural Community under CEQA based on 1 and 2 in the above guidance. As discussed in the previously approved IS/MND and below, no wetlands or riparian areas would be impacted by the project; therefore, 3a does not apply. In addition, 3b would not apply as the focused CAGN surveys conducted as part of the previously approved IS/MND in 2018 and as part of this Addendum in 2020 did not confirm presence of listed species. Additionally, the project would not eliminate a plant community as described in 3c. Further, no plans, regulation, or ordinances as described in 3d apply to the project site. Within San Bernardino County, RAFSS has been considered a regionally sensitive community, meeting criteria 3e. Therefore, under CDFW guidance, 3e would be the only applicable criteria for determining sensitive communities in the study area.

Prior to MCV, natural communities were classified according to the Preliminary Descriptions of the Terrestrial Natural Communities of California (Holland 1986). RAFSS was designated by Holland as a sensitive community, although a description was not provided for this community. Sensitive communities were documented in the California Natural Diversity Database (CNDDB) until the mid-1990s and were mapped according to Holland classifications. CDFW (2020) states that these legacy sensitive natural communities still present in the CNDDB will be updated to reflect current mapping standards and rank. Until this reclassification occurs, these communities remain mapped in the CNDDB and CDFW advises their

existence should be addressed in CEQA review. The Biological Resources Constraints Letter references the CNDDDB in its designation of RAFSS as a sensitive community present on site and the CNDDDB includes a polygon of RAFSS mapped in 1985 overlapping the southeastern portion of the project site.

There is not one universally accepted definition of RAFSS. Nonetheless, MCV along with several studies (Barbour and Wirka 1997; Buck-Diaz and Evens 2011) lists RAFSS as part of the scalebroom series and scalebroom (*Lepidospartum squamatum*) has generally been considered an indicator species of RAFSS. Barbour and Wirka (1997) determined that RAFSS falls into four different MCV series, catclaw acacia series, scalebroom series, chamise series, and white sage series. In addition, Buck-Diaz and Evens (2011) conducted a survey of alluvial scrub and found that the majority of the 165 field surveys similarly represented numerous associations within the scalebroom (*Lepidospartum squamatum*) Alliance. According to this study, California scalebroom is justifiably the definitive alluvial scrub type of Southern California, with various permutations at the association level, and this alliance was observed in five out of the six counties sampled. Further, the majority of new data from 2010–2011 represented the scalebroom (*Lepidospartum squamatum*) Alliance in 39 out of 49 survey points. Five additional alliances make up the remaining survey points including, *Encelia actoni*–alluvial scrub, *Eriodictyon crassifolium*, *Lepidospartum squamatum*/mixed ephemeral annuals (*Chaenactis glabriuscula*), and *Salvia apiana*–*Artemisia californica*–*Ericameria* spp. As such, there are varying definitions of RAFSS; however, the following have generally been considered to be associated with RAFSS: scalebroom series, catclaw acacia series, chamise series, white sage series, scalebroom (*Lepidospartum squamatum*) Alliance, *Encelia actoni*–alluvial scrub, *Eriodictyon crassifolium*, *Lepidospartum squamatum*/mixed ephemeral annuals (*Chaenactis glabriuscula*), and *Salvia apiana*–*Artemisia californica*–*Ericameria* spp. The reconnaissance survey conducted as part of this Addendum documented species present consistent with species documented in the Cadre Biological Resources Constraints Letter Report and neither identified any of the abovementioned species composition for the area). Thus, as further discussed below, the project site is not characteristic of RAFSS habitat.

The Biological Resources Constraints Letter describes that RAFSS habitat was classified based on soil types (rock–sandy/loam) and review of aerial photographs that clearly indicate the current and past alluvial soil-vegetative signature. It goes on to state that the southwestern region of Deer Creek wash, where the study area is located, has not been recently subjected to extensive scouring by flood waters due to flood control features that direct the majority of flows in the vicinity east of the study area.

Since the approval of the IS/MND for the project, the conclusions related to the species composition, evidence of the site as a historic floodplain, and absence of scouring in recent years due to the redirection of flows, has not changed. However, based on existing studies referenced above and a desktop review of the study area, the area classified as RAFSS habitat should not be classified as such. The mapping by the CNDDDB of RAFSS in this area was documented in 1985 and includes a large polygon of which a portion has since been developed. Sometime between the mapping in the CNDDDB in 1985 and the next available aerial photograph in 1995, development occurred to the southeast of the project site and flows from Day Creek wash were redirected further east. A review of aerial photographs from 1995 to 2020 show the active floodplain consistently approximately one-third to one-half mile east of the project site (Google 2020; Historical Aerials 2020). Due to the lack of active scouring, which is characteristic of alluvial fans, and the change of hydrology to the site and immediate area, site would not be considered RAFSS habitat.

Further, the species composition for the area—California sagebrush, California buckwheat, pinebush (*Ericameria pinifolia*), white sage (*Salvia apiana*), deerweed (*Acmispon glaber*), and chamise—is consistent with the MCV association *Artemisia californica*–*Eriogonum fasciculatum*, which is not characteristic of

RAFSS habitat as described by MCV or either the Barbour and Wirka (1997) or Buck-Diaz and Evens (2011) studies. This MCV association has a rank of G4S4 and is not considered a sensitive vegetation community by CDFW. Due to this area no longer being within an active fluvial area, this on-site community would also not meet the definition of RAFSS as described by the County as a sensitive community. As this community is not a sensitive community under CEQA, impacts to sensitive communities would not occur and no mitigation measure is required. As such, the project would not result in new significant impacts to biological resources, nor would it result in substantial increases in the severity of impacts or the need for new mitigation measures.

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

New Ability to Substantially Reduce Significant Impact . A Biological Resources Constraints Letter Report prepared by Cadre Environmental and included as Appendix B to the previously approved IS/MND evaluated the potential for on-site resources to be considered jurisdictional during the field survey effort. Since it was determined that some of the drainages on site could qualify as waters of the United States and streambeds, a jurisdictional delineation was prepared by Wood Environment and Infrastructure Solution and included as Appendix B to the previously approved IS/MND. The jurisdictional delineation determined the study area contains 11 jurisdictional areas identified as Drainages 1 through 11. All of the drainages are ephemeral, and the majority flow from north to south with the exception of Drainages 10 and 11 that flow east to west. The proposed project's roadway and culvert extensions were considered permanent impacts. Temporary impacts were assessed for the area from the permanent impacts to the edge of the construction footprint. As such, the IS/MND included MM BIO 3, which requires mitigation at a 1:1 ratio for temporary impacts and 2:1 ratio for permanent impacts to jurisdictional waters. As previously discussed and described in more detail below, with the new Navigable Waters Protection Rule, the drainages on site are no longer regulated as waters of the United States; therefore, impacts to federally protected waters are substantially reduced.

As previously mentioned, the jurisdictional waters shapefiles were overlain on aerial photographs and project topography to confirm accuracy, and design plans. Based on this review, no changes with respect to the existing conditions were identified. However, as discussed previously, based on the Navigable Waters Protection Rule released in April 2020, that went into effect on June 22, 2020, the drainages on site are no longer under the jurisdiction of the ACOE. Therefore, impacts as characterized in the IS/MND and in MM BIO 3 only apply to the jurisdiction of the Regional Water Quality Control Board and CDFW as waters of the state and streambed. The area of impacts, characterization of impacts, and proposed mitigation for waters of the state and streambed are consistent with what is identified in the previously approved IS/MND. As such, the project would not result in new significant impacts to biological resources, nor would it result in substantial increases in the severity of impacts or the need for new mitigation measures; however, impacts to federally protected waters are substantially reduced.

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

No Substantial Change from Previous Analysis. The previously approved IS/MND determined the proposed project would not interfere with the movement of wildlife. The project as described herein (Section 1.4)

would not change from the project described in the previously approved IS/MND. The project consists of improvements to approximately 2.1 miles of roadway and associated drainage improvements in an area that does not contain natural habitats that could support sensitive species or nursery sites. As previously analyzed, the project site does not contain natural habitats that would support sensitive species or nursery sites. Moreover, the project alignment is not shown on the San Bernardino County General Plan Open Space Element Map as being located within wildlife corridor (County of San Bernardino 2007). As such, no changes to the level of impact identified in the previously approved IS/MND related to movement of wildlife would occur and impacts would remain less than significant. Thus, the project would not result in new significant impacts to biological resources, nor would it result in substantial increases in the severity of impacts or the need for new mitigation measures

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

No Substantial Change from Previous Analysis. The previously approved IS/MND determined that implementation of the proposed project would not conflict with any local policies protecting biological resources identified in the San Bernardino County General Plan or ordinances protecting biological resources. Several mature oak trees meeting the minimum classification standard as a regulated tree under Section 88.01.040 of the San Bernardino County Development Code were documented within the project study area. In the event the proposed project would result in direct or indirect impacts to regulated trees, MM BIO 4 requires a certified arborist, horticulturist, or registered landscape architect familiar with the County's Development Code for regulated trees to conduct an assessment of the trees proposed for removal within the entire study area. No changes amendments have been made to Section 88.01.040 of the San Bernardino County Development Code since 2009, and thus, is still applicable to the proposed project. Therefore, no changes to the level of impact identified in the previously approved IS/MND would occur. As such, the project would not result in new significant impacts to biological resources, nor would it result in substantial increases in the severity of impacts or the need for new mitigation measures.

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

No Substantial Change from Previous Analysis. As analyzed in the previously approved IS/MND, the project site is not within an adopted Habitat Conservation Plan; Natural Community Conservation Plan; or other approved local, regional, or state habitat conservation plan. There are no proposed changes to the location of the project and no changes to the existing condition of the project site have occurred since the release of the previously approved IS/MND. As such, the project as analyzed herein would not result in new significant impacts related to conflict with a Habitat Conservation Plan. Therefore, no changes to the level of impact identified in the previously approved IS/MND would occur. As such, the project would not result in new significant impacts to biological resources, nor would it result in substantial increases in the severity of impacts or the need for new mitigation measures.

Changes in Circumstance/New Information

The project site remains located on approximately 1.3 miles of Snow Drop Road and proposes improvements to approximately 2.1 miles of roadway and associated drainage improvements. No new information has been discovered in the study area that would result in any new, potentially significant impacts, or increase the severity of potentially significant impacts previously identified in the IS/MND. However, changes with respect to CAGN impacts,

classification of on-site vegetation communities and waters of the United States have been described under Environmental Analysis, above. CAGN have not been documented as breeding within the project site, and removal of a linear strip totaling 1.02 acres of vegetation potentially suitable for CAGN would not result in substantial adverse effects to this species and does not require mitigation under CEQA. As such, mitigation measures MM BIO 2 would not be required to reduce impacts to less than significant. The on-site vegetation community previously described as RAFSS is more correctly classified under MCV as California sagebrush–California buckwheat scrub, which is not a sensitive community under CEQA and does not require mitigation. Additionally, based on the Navigable Waters Protection Rule released in April 2020, that went into effect on June 22, 2020, ephemeral waters are no longer protected waters of the United States; therefore, waters within the project are no longer regulated by ACOE. As such, permits are no longer required from ACOE, and consultation with USFWS is no longer required as part of the project.

Conclusion

In conclusion, MM BIO 2 would no longer be required to reduce impacts to CAGN, and impacts related to sensitive communities would be less than significant without mitigation. With implementation of MM BIO 1 and MM BIO 4, no new or more severe impacts associated with biological resources would occur. No new mitigation measures are required.

3.5 Cultural Resources

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
VI. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Analysis

No Substantial Change from Previous Analysis. As explained in the previously approved IS/MND, the project would result in potentially significant impacts to cultural resources. Mitigation measures are required to reduce identified impacts to a level below significance for historical resources, archeological resources, paleontological resources, and human remains. As explained in the previously approved IS/MND, the cultural resources records search conducted within 1 mile of the project site determined that no historical resources defined by CEQA, or any historic

properties, as defined by NHPA, were encountered within the project area. The Cultural Resources Inventory (included as Appendix C to the IS/MND) identified 18 cultural resources and two prehistoric resources within the one-mile search area. Because the project is in an area of steep terrain and the results of previous archaeological studies in the vicinity of the project area identified cultural resources, the likelihood of subsurface cultural resources within the project area is low to moderate. Nonetheless, due to the potential for accidental discovery of a cultural and/or historic resource, implementation of MM CR 1 would be required to reduce potential impacts to cultural resources to less than significant. In addition, MM CR 2 is required to ensure that potential impacts to paleontological resources are avoided or reduced during project construction. Further, in the unlikely event that human remains are encountered during project construction, implementation of mitigation measure, MM CR 3, would reduce impacts to a less-than-significant level. Impacts to cultural resources would not change from those of identified in the previously approved IS/MND. As previously analyzed, the project would be located within the same disturbance footprint with the same potential for impacts to cultural resources. Thus, MM CR 1 through MM CR 3 would be required for the project. As such, the project as described herein would not result in new significant impacts to cultural resources, nor would it result in substantial increases in the severity of impacts or the need for new mitigation measures.

Changes in Circumstance/New Information

No changes to the site have occurred that would alter the conclusions or the analysis of the previously approved IS/MND in the categories of historical resources, archeological resources, paleontological resources, and human remains. No new regulations or design standards have been implemented since approval of the IS/MND that would alter the conclusions or the analysis in the category of cultural resources. As such, there are no substantial changes with respect to the circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to cultural resources that would change the impact conclusions in the previously approved IS/MND.

Conclusion

In conclusion, with implementation of MR CR 1 through MM CR 3, no new or more severe impacts associated with cultural resources would occur, and the level of impact would not change from the level identified in the previously approved IS/MND. No new mitigation measures are required.

3.6 Geology and Soils

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
VI. GEOLOGY AND SOILS – Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
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 type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks 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 waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Analysis

As explained in the previously approved IS/MND, the project would result in less-than-significant impacts to geology and soils and no mitigation measures were required. This Addendum does not represent a change in the location of the project, the existing conditions, nor a change in the project description. As such, the same geologic conditions that were analyzed and discussed in the previously approved IS/MND would apply. The proposed project includes only roadway and drainage improvements to a partially paved road that is currently being used. The project does not propose any structures, habitable or otherwise, that could pose a substantial risk to people or other structures in the event of strong seismic ground shaking. Therefore, the potential for impacts that would expose people or structures to substantial adverse effects associated with the rupture of a known earthquake fault, strong seismic ground shaking, ground failure resulting liquefaction, and landslides is less than significant. As the project only involves improvements to an existing road, extensive excavation, grading, and fill are not required. Therefore, a substantial loss of topsoil is not anticipated. In addition, the project would include design features such as reinforced concrete retaining walls, to reduce the potential for impacts that would expose people or structures to

substantial adverse effects associated with landslides. Further, the previously approved IS/MND determined soils within the project area are not considered expansive. As such, the project as analyzed herein would not result in new significant impacts to geology and soils, nor would it result in substantial increases in the severity of impacts or the need for new mitigation measures.

Changes in Circumstance/New Information

No changes to geologic features have occurred since approval of the IS/MND. One of the revisions to Appendix G of the CEQA Guidelines involved moving the discussion of paleontological resources from the cultural resources checklist questions to the geology and soil checklist questions (14 CCR 15000 et seq., as amended December 28, 2018). As the discussion of paleontological resources has been provided under cultural resources, potential impacts to this resource have been addressed and no substantial changes have occurred. As such, there are no substantial changes with respect to circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to geology and soils that would change the impact conclusions in the previously approved IS/MND.

Conclusion

In conclusion, no new or more severe impacts associated with geology and soils would occur, and the level of impact would not change from the level identified in the previously approved IS/MND. No new mitigation measures are required.

3.7 Greenhouse Gas Emissions

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
VII. GREENHOUSE GAS EMISSIONS – 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Analysis

The previously approved IS/MND determined the project would result in less-than-significant impacts in the category of greenhouse gas emissions and no mitigation measures were required. As described in the previously approved IS/MND, the project construction would result in an estimated 399.6 metric tons of carbon dioxide equivalent per year, and infrequent operational emissions would not generate significant amounts of greenhouse gases. The construction equipment type and duration previously analyzed, and the operational characteristics of the project would not change. Given, no changes have occurred with respect to the nature of project construction and operations, the project would not result in an increase in greenhouse gas emission impacts. As such, the project

as analyzed herein would not result in new significant impacts to greenhouse gas emissions, nor would it result in substantial increases in the severity of impacts or the need for new mitigation measures.

Changes in Circumstance/New Information

Since approval of the IS/MND, no substantial changes related to greenhouse gas emissions have occurred in the project area. Additionally, no new regulations or design standards have been implemented since approval of the IS/MND that would alter the conclusions or the analysis in the category of greenhouse gas emissions. There are no substantial changes with respect to the circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to greenhouse gas emissions that has changed the impact conclusions in the previously approved IS/MND.

Conclusion

In conclusion, no new or more severe impacts associated with greenhouse gas emissions would occur, and the level of impact would not change from the level identified in the previously approved IS/MND. No new mitigation measures are required.

3.8 Hazards and Hazardous Materials

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Analysis

As described in the previously approved IS/MND, the project would result in less-than-significant impacts in the category of hazards and hazardous materials and no mitigation measures were required. The project as described herein (Section 1.4) would not result in any changes to the project description as previously described in the IS/MND. The project consists of improvements to approximately 2.1 miles of roadway and associated drainage improvements. As such, the types of materials used during construction, and the nature of construction activities would not change from those previously analyzed. In addition, the operations of the project would not change. As previously analyzed, the transport, use, and disposal of hazardous material during construction would be conducted in accordance with applicable state and federal laws. Once completed, motorists using the project's road may transport small quantities of household hazardous waste; however, these products, transported in accordance with manufacturer's recommendations, would not result in the release of hazardous materials into the environment.

Additionally, no changes to the project location are proposed. As previously analyzed, the project site is not located within one-quarter mile of an existing or proposed school, and thus, no impacts to schools would occur. The project site is not located on a known hazardous materials site, which could create a significant hazard to the public or environment. The project site is not located within two miles of a public airport or public use airport or heliport, which could result in a safety hazard for people residing or working in the project area. As proposed, the project would not interfere with the City's emergency response or evacuation plans since the project involves roadway and drainage improvements. Further, the proposed improvements would not expose people or structures to significant risk of loss, injury, or death involving wildfires (CAL FIRE 2020). For these reasons, the project as discussed herein

would not result in new significant environmental effects with respect to hazards and hazardous materials, nor would it result in substantial increases in the severity of impacts or the need for new mitigation measures.

Changes in Circumstance/New Information

No changes to the general land use and character of the project area have occurred since approval of the IS/MND. Since project approval, updates to the CEQA Guidelines have gone into effect for County CEQA documents (April 27, 2020). One of the revisions to Appendix G of the CEQA Guidelines involves a more extensive wildfire analysis for projects located in or near state responsibility areas for firefighting or lands classified as very high fire hazard severity zones (14 CCR 15000 et seq., as amended December 28, 2018). Although the project site is designated by the San Bernardino County General Plan Hazard Overlay's Map as Fire Safety Area 3, it was determined that due to the nature of the project (roadway and drainage improvements), no risk associated with wildfires would occur. As the discussion of wildfire hazards has been provided under hazards and hazardous materials, potential impacts to this resource have been addressed and no substantial changes have occurred. Aside from the CEQA Guidelines updates, no new regulations or design standards have been implemented that would alter the conclusions or the analysis in the category of hazards and hazardous materials. As such, there are no substantial changes with respect to circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to hazards and hazardous materials in the project area that would change the impact conclusions in the previously approved IS/MND.

Conclusion

In conclusion, no new or more severe impacts associated with hazards and hazardous materials would occur, and the level of impact would not change from the level identified in the previously approved IS/MND. No new mitigation measures are required.

3.9 Hydrology and Water Quality

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
IX. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Analysis

The previously approved IS/MND determined the project would result in less-than-significant impacts in the category of hydrology and water quality and no mitigation measures were required. The project described herein does not involve changes in the location of the project, the construction scenario for the project, or the design of the project such that the existing or proposed hydrologic conditions of the site would be substantially altered from those evaluated in the previously approved IS/MND. As previously analyzed, adherence to the best management practices identified in the stormwater pollution prevention plan (SWPPP) would ensure construction-related impacts with respect to water quality standards and waste discharge requirements would be less than significant. The project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge

such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Construction of the project may temporarily alter existing drainage patterns of the project site; however, the alterations would not be considered substantial and would not alter the course of a stream or river, resulting in substantial erosion, siltation, or flooding on or off site. Additionally, the SWPPP would implement best management practices to minimize the potential for construction-related runoff and ensure the project does not otherwise degrade water quality. Further, the project site would not change; as such, the same hydrologic conditions that were analyzed and discussed in the previously approved IS/MND would not change. The project site is not located within a 100-year floodplain. As with the previously approved IS/MND, the project as discussed herein is proposed to improve drainage culverts and stormwater treatment facilities and would not expose people or structure to risk involving flooding. As such, the project would not result in new significant environmental effects with respect to hydrology and water quality, nor would it result in a substantial increase in the severity of a previously identified significant impact or the need for new mitigation measures.

Changes in Circumstance/New Information

The project site has not changed from the existing conditions previously analyzed. No new regulations or design standards have been implemented that would alter the conclusions or the analysis for the project in the category of hydrology and water quality. As such, there are no substantial changes with respect to circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to hydrology and water quality that would change the impact conclusions in the previously approved IS/MND.

Conclusion

In conclusion, no new or more severe impacts associated with hydrology and water quality would occur, and the level of impact would not change from the level identified in the previously approved IS/MND. No new mitigation measures are required.

3.10 Land Use and Planning

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
X. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Analysis

The previously approved IS/MND determined the project would result in no impacts in the category of land use and planning, and thus, no mitigation measures were required. As discussed herein no changes are proposed regarding the use of the proposed project. Under the existing conditions, and upon completion of the proposed project, the project site would continue to operate as a roadway. As previously analyzed, the proposed project involves modifications to an existing roadway to reach its ultimate design, and thus, is considered to be planned infrastructure consistent with the General Plan Circulation Element. Additionally, the project site is not located within a habitat conservation area. As such, the project would not result in new significant environmental effects with respect to land use and planning, nor would it result in a substantial increase in the severity of a previously identified significant impact or the need for new mitigation measures.

Changes in Circumstance/New Information

No changes in land uses in the project area have occurred that would change the land use analysis and conclusions presented in the previously approved IS/MND. The General Plan text was adopted on March 13, 2007, and became effective on April 12, 2007. As such, there are no substantial changes with respect to circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to land use and planning in the area that would change the impact conclusions in the previously approved IS/MND.

Conclusion

In conclusion, no new or more severe impacts associated with land use and planning would occur, and the level of impact would not change from the level identified in the previously approved IS/MND. No new mitigation measures are required.

3.11 Mineral Resources

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
XI. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<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"/>

Environmental Analysis

As described in the previously approved IS/MND, the project would result in less-than-significant impacts in the category of mineral resources and no mitigation measures were required. The project described herein would result

in no changes to the project location or project description. As previously analyzed, the project would not 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, because there are no known valuable mineral resources in the vicinity of the project site. Additionally, the project would not 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, because no mining operations or other resource recovery sites exist on or near the project site (City of Ranch Cucamonga 2010). As such, the project would not result in new significant environmental effects with respect to mineral resources, nor would it result in a substantial increase in the severity of a previously identified significant impact or the need for new mitigation measures.

Changes in Circumstance/New Information

Since the approval of the IS/MND no substantial changes related to mineral resources have occurred in the project area. Additionally, there are no changes in zoning regulations or regulations related to mineral resources that have occurred. As such, there are no substantial changes with respect to circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to mineral resources that would change the impact conclusions in the previously approved IS/MND.

Conclusion

In conclusion, no new or more severe impacts associated with the mineral resources would occur, and the level of impact would not change from the level identified in the previously approved IS/MND. No new mitigation measures are required.

3.12 Noise

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
XII. NOISE – Would the project result in:				
a) Exposure of persons to or generation of noise levels 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 type="checkbox"/>	<input checked="" type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Analysis

As described in the previously approved IS/MND, the project would result in potentially significant impacts in the category of noise. The noise mitigation measures shown in Section 2.1 of this Addendum are required to reduce identified impacts to a level below significance. The project as described herein (Section 1.4) would not result in any changes to the project description as previously described in the IS/MND. The project consists of improvements to approximately 2.1 miles of roadway and associated drainage improvements. As such, the construction equipment-type and duration previously analyzed, and the operational characteristics of the project would not change. As previously analyzed, construction activities would be temporary in nature and would occur during the hours of 7:00 a.m. and 7:00 p.m., Monday to Saturday, in accordance with the San Bernardino County Noise Ordinance. Existing sensitive receivers along the project are located approximately 50 to 100 feet from where construction activities are likely to take place. Typical building construction provides a minimum 12 A-weighted decibel (dBA) interior noise reduction with windows open and a minimum 20 dBA interior noise reduction with windows closed. The project would increase noise and groundborne vibration in the project vicinity during the construction phase. To reduce potential impacts to sensitive receptors and impacts related to excessive groundborne vibration or groundborne noise levels during the construction phase, MM Noise 1 through MM Noise 4 would be required. Once operational, the project is not anticipated to substantially increase traffic trips, or generate heavy truck traffic associated with industrial uses. Therefore, since the project is not anticipated to generate a significant amount of additional vehicular trips, impacts are considered to be less than significant. As such, the project would not result in new significant environmental effects with respect to noise, nor would it result in a substantial increase in the severity of a previously identified significant impact or the need for new mitigation measures.

Changes in Circumstance/New Information

Since approval of the IS/MND, updates to the CEQA guidelines have gone into effect. The updates related to noise involves combining thresholds (a), (c), and (d), combining airport safety and noise into one threshold question, and deleting the reference to private airstrips. These revisions served to add efficiency and clarity to aspects of the guidelines and does not change the impact conclusions in the previously approved IS/MND. Aside from updates to the CEQA Guidelines, no new regulations have been adopted or updated that would affect the noise analysis or conclusions originally presented in the previously approved IS/MND. As such, there are no substantial changes with

respect to circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to noise that would change the impact conclusions in the previously approved IS/MND.

Conclusion

In conclusion, with implementation of MM Noise 1 through MM Noise 4, no new or more severe impacts associated with the noise would occur, and the level of impact would not change from the level identified in the previously approved IS/MND. No new mitigation measures are required.

3.13 Population and Housing

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
XIII. POPULATION AND HOUSING – Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Analysis

The previously approved IS/MND determined the project would result in less-than-significant impacts in the category population and housing and no mitigation measures were required. The project as described herein (Section 1.4) would not result in any changes to the project description as previously described in the IS/MND. The proposed project does not involve the construction of new homes. The project does involve modifications to an existing roadway; however, the project itself does not require an extension of utilities or services. No housing or people are currently located on the project site, and thus, no housing or people would be displaced as result of the project. Therefore, the project would not displace a substantial number of people or housing. As such, the project would not result in new significant environmental effects with respect to population and housing, nor would it result in a substantial increase in the severity of a previously identified significant impact or the need for new mitigation measures.

Changes in Circumstance/New Information

Since approval of the IS/MND, no change with respect to population and housing have occurred on the project site that would change the analysis and conclusions presented in the previously approved IS/MND. The Southern

California Association of Governments has approved the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy since approval of the IS/MND. This does not change the determinations made in the IS/MND, as the growth projections for the County have continued to increase and the project would not generate population growth. As such, there are no substantial changes with respect to circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to population and housing in the area that would change the impact conclusions in the previously approved IS/MND.

Conclusion

In conclusion, no new or more severe impacts associated with population and housing would occur, and the level of impact would not change from the level identified in the previously approved IS/MND. No new mitigation measures are required.

3.14 Public Services

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
XIV. PUBLIC SERVICES				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Analysis

The previously approved IS/MND determined the project would result in less-than-significant impacts in the category of public services, and thus, no mitigation measures were required. The project as described herein (Section 1.4) would not change from the project described in the previously approved IS/MND. The project does not involve construction of housing or other structure that would result in an increase in population; therefore, operational impacts to public services would be less than significant. Because the proposed land use would not change, impacts to fire protection, police protection, schools, and library services would be generally the same as those identified for the previously approved IS/MND. Since the project is a roadway improvement intended to improve circulation for existing and future traffic and does not propose any structures or other development that would increase demand for fire protection services, police protection services, schools, parks, or other public facilities, impacts would be less than significant. As such, the project would not result in new significant environmental effects with respect to public services, nor would it result in a substantial increase in the severity of a previously identified significant impact or the need for new mitigation measures.

Changes in Circumstance/New Information

No changes have occurred (such as closure of a nearby public facility serving the project site) that would change the public services analysis and conclusions originally presented in the previously approved IS/MND. Furthermore, no new regulations have been adopted or updated that would affect the public services analysis or conclusions originally presented in the previously approved IS/MND. As such, there are no substantial changes with respect to circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to public services that would change the impact conclusions in the previously approved IS/MND.

Conclusion

In conclusion, no new or more severe impacts associated with public services would occur, and the level of impact would not change from the level identified in the previously approved IS/MND. No new mitigation measures are required.

3.15 Recreation

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
XV. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<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"/>

Environmental Analysis

The previously approved IS/MND determined the project would result in no impacts in the category of recreation, and thus, no mitigation measures were required. The project as described herein (Section 1.4) would not result in any changes to the project description as previously described in the IS/MND. The project does not involve construction of housing or other structure that would result in an increase in population; therefore, the project would not increase the use of existing neighborhood and regional parks or other recreational facilities. Additionally, the project proposes the construction of roadway and drainage improvements to a partially paved road that is currently being used. Thus, the project would not include the development of recreational facilities, or create or increase demand for new recreational facilities or parks. As such, the project would not result in new significant impacts to recreation and would not result in substantial increases in the severity of previously identified significant impacts or the need to provide new mitigation measures.

Changes in Circumstance/New Information

No changes have occurred (e.g., closure of a recreational facility serving the project site) that would change the recreation analysis and conclusions originally presented in the previously approved IS/MND. No new regulations have been adopted or updated that would affect the recreation analysis or conclusions originally presented in the previously approved IS/MND. As such, there are no substantial changes with respect to circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to recreation that would change the impact conclusions in the previously approved IS/MND.

Conclusion

In conclusion, no new or more severe impacts associated with recreation would occur, and the level of impact would not change from the level identified in the previously approved IS/MND. No new mitigation measures are required.

3.16 Transportation/Traffic

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
XVI. TRANSPORTATION/TRAFFIC – Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a 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"/>

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Analysis

As described in the previously approved IS/MND, the project would result in potentially significant impacts in the category of emergency access. The mitigation measures shown in Section 2.1 of this Addendum are required to reduce identified impacts to a level below significance. All other categories related to air quality were determined to be significant without mitigation. The project as described herein (Section 1.4) would not result in any changes to the project description as previously described in the IS/MND. The project consists of improvements to approximately 2.1 miles of roadway and associated drainage improvements. As previously analyzed, the project is not anticipated to generate an increase in traffic because Snow Drop Road would not be used for through traffic, as it only provides access to the 10 rural residential lots that are located in the vicinity. Given the small quantities of traffic that would be generated along Snow Drop Road, the project would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system. The closest airport to the project is the Cable Airport, located in the city of Upland, approximately 6.3 miles southwest of the project. Thus, the project would not impact air traffic patterns. The project improvements are proposed to increase the safety of the road conditions and would not pose significant hazards due to design features. Construction of the proposed project would temporarily impact roadway access. Therefore, mitigation measures MM Trans 1 and MM Trans 2 are proposed to reduce potential impacts related to inadequate emergency access to less than significant. As such, the project would not result in new significant impacts to transportation/traffic and would not result in substantial increases in the severity of previously identified significant impacts or the need to provide new mitigation measures.

Changes in Circumstance/New Information

Since approval of the IS/MND, updates to the CEQA Guidelines have gone into effect. One of the revisions incorporates the requirements of SB 743, which created a new process for analyzing transportation impacts under CEQA. Under the new transportation guidelines, level of service, or automobile delay, will no longer be considered an environmental impact under CEQA. Rather, VMT will be used to assess the significance of transportation impacts. The new guidelines were implemented statewide on July 1, 2020. The traffic and transportation analysis in the previously approved IS/MND provided a brief discussion of level of service to characterize impacts. Since use of VMT was not yet mandatory, and the approved CEQA documentation was circulated for review before the updated CEQA Guidelines were approved, a discussion of VMT was not included in the analysis. Additionally, as discussed in the previously approved IS/MND, the Project is not anticipated to generate an increase in traffic because Snow Drop Road would not be used for through traffic, as it only provides access to the 10 rural residential lots that are located in the vicinity. No other new regulations, plans, or policies have been adopted or updated that would affect

the analysis or conclusions related to transportation/traffic facilities that were originally presented in the previously approved IS/MND. For these reasons, there are no substantial changes with respect to circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to transportation/traffic that would change the impact conclusions in the previously approved IS/MND.

Conclusion

In conclusion, with implementation of MM Trans 1 and MM Trans 2, no new or more severe impacts associated with public services would occur, and the level of impact would not change from the level identified in the previously approved IS/MND. No new mitigation measures are required.

3.17 Tribal Cultural Resources

	New Significant Impact	More Severe Impacts	New Ability to Substanti ally Reduce Significan t Impact	No Substant ial Change from Previous Analysis
XVII. TRIBAL CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Analysis

As explained in the previously approved IS/MND, the project would result in potentially significant impacts to tribal cultural resources. Mitigation measures are required to reduce identified impacts to a level below significance. As explained in the previously approved IS/MND, the cultural resources records search conducted within one mile of the project determined that no historical resources defined by CEQA, or any historic properties, as defined by NHPA, were encountered within the project area. The project as described herein (Section 1.4) would not result in any changes to the project description as previously described in the IS/MND. Additionally, no changes are proposed to the project location. Thus, site-specific information analyzed in the previously approved IS/MND would not change.

No tribal cultural resources were identified at the project site as a result of Assembly Bill 52 consultation efforts. However, both the San Manuel Band of Mission Indians and Morongo Band of Mission Indians requested to be contacted in the event of an inadvertent discovery during project construction. Therefore, implementation of MM TCR 1 would be required to reduce potential impacts to tribal cultural resources to less than significant. As such, the project would not result in new significant impacts to tribal cultural resources, nor would it result in substantial increases in the severity of impacts or the need for new mitigation measures.

Changes in Circumstance/New Information

No changes to the site have occurred that would alter the conclusions or the analysis of the previously approved IS/MND in the category of tribal cultural resources. No new regulations or design standards have been implemented since approval of the IS/MND that would alter the conclusions or the analysis in the category of tribal cultural resources. As such, there are no substantial changes with respect to the circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to tribal cultural resources that would change the impact conclusions in the previously approved IS/MND.

Conclusion

In conclusion, with implementation of MM TRC 1 no new or more severe impacts associated with tribal cultural resources would occur, and the level of impact would not change from the level identified in the previously approved IS/MND. No new mitigation measures are required.

3.18 Utilities and Service Systems

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
XVIII. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
e) 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"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Analysis

The previously approved IS/MND determined the project would result in less-than-significant impacts in the category of utility and service systems, and thus, no mitigation measures were required. The project as described herein (Section 1.4) would not result in any changes to the project description as previously described in the IS/MND. The project does not involve construction of housing or other structure that would result in an increase in population; therefore, the project would not generate wastewater or require water supply beyond what was already evaluated for in the General Plan. Additionally, as previously described, the project involves drainage features, the impacts of which have been evaluated and would not result in significant impacts beyond those identified in the previously approved IS/MND. The proposed project is an infrastructure project and would not create a demand for water. Further, the project would generate limited amounts of solid waste during construction, which would not exceed the capacity of an existing landfill. As such, the project would not result in new significant impacts to utility and service systems and would not result in substantial increases in the severity of previously identified significant impacts or the need to provide new mitigation measures.

Changes in Circumstance/New Information

No changes have occurred to the County's utilities and service systems since approval of the IS/MND that would change or otherwise affect the analysis and conclusions originally presented in the previously approved IS/MND. Furthermore, no new regulations, plans, or policies have been adopted or updated that would affect the analysis or conclusions related to utilities and service systems that was originally presented in the previously approved IS/MND. As such, there are no substantial changes with respect to circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to utilities and service systems that would change the impact conclusions in the previously approved IS/MND.

Conclusion

In conclusion, no new or more severe impacts associated with utilities and service systems would occur, and the level of impact would not change from the level identified in the previously approved IS/MND. No new mitigation measures are required.

3.19 Mandatory Findings of Significance

	New Significant Impact	More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
XIX. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Analysis

As described in the previously approved IS/MND, the project would result in potentially significant impacts in the category of biological resources and cultural resources. Therefore, the project has the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or an endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. The mitigation measures related to biological resources and cultural resources shown in Section 2.1 of this Addendum were required to reduce identified impacts to a level below

significance. As previously analyzed, MM BIO 1 through MM BIO 4 were required to reduce the project's potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a Rare or Endangered plant or animal. However, as previously discussed in Section 3.4, Biological Resources, MM BIO 2 would not be applicable to the project. As discussed in Section 3.5, Cultural Resources, the project would not result in new significant impacts to cultural resources, nor would it result in substantial increases in the severity of impacts or the need for new mitigation measures. Thus, MM CR 1 would be required to ensure the project does not eliminate important examples of the major periods of California history or prehistory.

The project as described herein (Section 1.4) would not result in any changes to the project description as previously described in the IS/MND. The project consists of improvements to approximately 2.1 miles of roadway and associated drainage improvements. As discussed in Sections 3.1 through 3.18 of this Addendum, the proposed project does not have any impacts that are individually limited, but cumulatively considerable. The project is in conformance with the Air Quality Management Plan, and the project's short-term and long-term air quality emissions do not exceed the South Coast Air Quality Management District's established thresholds of significance; the Project's net increase in criteria pollutant emissions for which the project region is non-attainment is not cumulatively considerable. Additionally, the proposed project would not exceed either individually or cumulatively, a level of service standard established for designated roads or highways. Therefore, the project would result in new significant cumulative impacts and would not result in substantial increases in the severity of previously identified significant impacts or the need to provide new mitigation measures.

Changes in Circumstance/New Information

No new information has been discovered in the study area that would result in any new, potentially significant impacts, or increase the severity of potentially significant impacts previously identified in the IS/MND. As discussed in Section 3.4, Biological Resources, MM BIO 2 would not be required to reduce impacts to less than significant. No other changes in regulations that would affect the analysis or conclusion related to cumulative resources have occurred. As such, there are no substantial changes with respect to circumstances under which the project will be undertaken, and there is no new information of substantial importance that has become available relative to cumulative impacts that would change the impact conclusions in the previously approved IS/MND.

Conclusion

In conclusion, no new or more severe cumulative impacts would occur, and the level of impact would not change from the level identified in the previously approved IS/MND. No new mitigation measures are required.

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4 References and Preparers

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4.2 List of Preparers

Dudek

Veronika Archer, Senior Biologist

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Sabrina Alonso, Environmental Analyst

Appendix A

2020 Focused California Gnatcatcher Survey 45-Day Report

July 29, 2020

12423.03

U.S. Fish and Wildlife Service
Attn: Recovery Permit Coordinator
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, CA 92008

Subject: 2020 Focused California Gnatcatcher Survey 45-Day Report for the Snow Drop Road Improvements Project, Unincorporated San Bernardino County, California

Dear Recovery Permit Coordinator:

This report documents the method and results of protocol-level presence/absence surveys conducted for the coastal California gnatcatcher (*Poliophtila californica californica*; CAGN). Focused surveys were conducted throughout all areas of suitable habitat for the Snow Drop Road Improvement Project (project). The project site consists of approximately 15.86 acres and is located at coordinates: 34.169741, -117.575640. The proposed project includes enhancement of road conditions to approximately 2.1 miles of roadway and associated drainage improvements. A 500-foot buffer was placed around the project site to account for the biological study area for this report that accounts for approximately 261.6-acres.

As shown in Attachment A: Figure 2, approximately 2.72-acres of suitable CAGN habitat characterized by stands of *Artemisia californica*-*Eriogonum fasciculatum* scrub interspersed with chaparral and riparian habitats occur within the biological study area. The survey focused on this 2.72 acre area in the southeast corner of the biological study area that contains suitable habitat to support nesting and foraging CAGN. Dudek biologist Tommy Molioo (TE02412D-0) conducted CAGN surveys from May 2020 through the end of June 2020. The survey route followed accessible suitable habitat areas as indicated on Figure 2.

The CAGN is federally-listed as threatened and a California Department of Fish and Wildlife (CDFW) Species of Special Concern. It is closely associated with coastal sage scrub habitat and typically occurs below 950 feet elevation and on slopes less than 40% (Atwood 1990), but CAGN have also been observed at elevations greater than 2,000 feet. The species is primarily threatened by loss, degradation, and fragmentation of coastal sage scrub habitat, and is also impacted by brown-headed cowbird (*Molothrus ater*) nest parasitism (Braden et al. 1997).

LOCATION AND EXISTING CONDITIONS

The project is located north of the City of Rancho Cucamonga in an unincorporated area of the County of San Bernardino, California. The surrounding area is primarily unoccupied and undisturbed land with residential properties north of Snowdrop Rd. The survey area consists of a paved road with moderate to high quality coastal sage scrub vegetation adjacent to the southeastern portion of the paved road.

Three soil types, listed below, are mapped within the survey area (USDA NRCS 2019). The majority of the soils mapped within the survey areas are loamy.

- Cieneba sandy loam, 9 to 15 percent slopes
- Cieneba-Rock outcrop complex, 30 to 50 percent slopes, eroded
- Soboba stony loamy sand, 2 to 9 percent slopes

VEGETATION COMMUNITIES

The vegetation communities mapped for the project site includes a total of approximately 15.86 acres. The project site is characterized by native upland and riparian vegetation communities and a developed road. Eight vegetation communities were observed within the project site with one vegetation community identified as potentially suitable CAGN habitat, *Artemisia californica-Eriogonum fasciculatum* (AC-EF) Alliance. This community is described in detail below and acreage summarized in Table 1.

Artemisia californica-Eriogonum fasciculatum Alliance

This community is co-dominated by California sagebrush (*Artemisia californica*) and California buckwheat (*Eriogonum fasciculatum*) as the co-dominant species in the shrub canopy. This alliance has an intermittent to continuous canopy with most shrubs less than 2 meters and some less than 5 meters in height with a seasonally present herbaceous layer. Species generally associated with this alliance include chamise (*Adenostoma fasciculatum*), bush monkey flower (*Diplacus aurantiacus*), California joint fir (*Ephedra californica*), narrowleaf goldenbush (*Ericameria linearifolia*), chaparral yucca (*Hesperoyucca whipplei*), deer weed (*Lotus scoparius*), laurel sumac (*Malosma laurina*), lemonade berry (*Rhus integrifolia*), sugarbush (*Rhus ovata*) and white sage (*Salvia apiana*).

The *Artemisia californica-Eriogonum fasciculatum* alliance was mapped as a contiguous strip adjacent to Haven Avenue along the eastern portion of the study area. Other smaller areas are adjacent to Snowdrop Rd. in the northern portion of the study area, interspersed with chaparral and riparian habitats. The majority of the vegetation within the study area is moderate to high quality and relatively undisturbed.

Table 1. Vegetation Communities and Land Covers within the Project Site

MCV Vegetation Alliance Name	MCV- Association Name	Total Study Area (acres)
CAGN Suitable Shrubland and Alliances		
California sagebrush– California buckwheat scrub	<i>Artemisia californica–Eriogonum fasciculatum</i>	2.72
Non-Suitable CAGN Habitat		
Arroyo willow thickets	<i>Salix lasiolepis</i>	0.03
Mulefat thickets	<i>Baccharis salicifolia</i>	0.03
Coast live oak woodland	<i>Quercus agrifolia</i>	0.21
Black sage scrub	<i>Salvia mellifera–Eriogonum fasciculatum</i>	2.08

Chamise chaparral	<i>Adenostoma fasciculatum</i>	1.07
Eucalyptus grove	NA	0.23
Developed/disturbed	NA	9.49
Total		15.86

METHODS

The presence/absence focused survey for CAGN was conducted for the project between May 26, 2020 and June 30, 2020. The survey was conducted within weather conditions and time frames appropriate for the detection of gnatcatchers. Weather conditions and survey dates are provided below in Table 2. Survey routes are shown in Attachment A - Figure 2. The survey routes focused on moderate to high quality habitat, but also encroached into other habitat areas due to close proximity to suitable habitat and the observation of gnatcatcher foraging within adjacent habitats.

Table 2 Survey Dates and Conditions

Survey Pass	Date	Time	Personnel	Temperature ¹	Presence/Absence
1	05/26/2020	0700–1000	TM	70–72 °F; 0–1 mph; 0% cc	Absent
2	6/02/2020	0730–0930	TM	72–74 °F; 0–1 mph; 0% cc	Absent
3	06/09/2020	0700–1000	TM	74–77 °F; 1–2 mph; 0% cc	Absent
4	06/16/2020	0645–0830	TM	65–67 °F; 0–1 mph; 80% cc	Absent
5	6/24/2020	1000–1100	TM	67–70 °F; 1–2 mph; 0% cc	Absent
6	6/30/2020	0900–1000	TM	68–70 °F; 0–1 mph; 0% cc	Absent

¹ **Survey Conditions:** °F = degrees Fahrenheit; cc = cloud cover; mph = miles per hour

The survey was conducted following the currently accepted protocol of the U.S. Fish and Wildlife Service (USFWS), *Coastal California Gnatcatcher (Polioptila californica californica) Presence/Absence Survey Protocol* (USFWS 1997). The CAGN focused survey included six survey passes at a minimum of 7-day intervals between visits during the breeding season (March 14 through June 30). In accordance with the protocol, no more than 80 acres of suitable habitat were surveyed by a single permitted biologist during each site visit conducted. Survey routes completely covered all areas of suitable CAGN habitat within the survey area and allowed for complete audible and visual coverage of all suitable CAGN habitat on site (Attachment A: Figure 2).

A 200-scale topographic map (1 inch = 200 feet) overlain with vegetation polygons and the survey area was utilized during the survey. Additionally, digital mobile maps were utilized during the surveys to assist in navigating each survey area. Appropriate binoculars (e.g., 8x42 through 10x50 magnification) were used to aid in detecting and identifying bird species. A recording of gnatcatcher vocalizations was played approximately every 50–100 feet to induce responses from potentially present gnatcatchers. Vocalization-playback would have been terminated immediately upon detection of any gnatcatchers to minimize the potential for harassment.

RESULTS

No CAGN (i.e., individuals and/or nests) were detected within the Snow Drop Road Improvement Project survey area in 2020. Therefore, the project site is currently considered absent of CAGN. Other species found within the Project area include: mourning dove (*Zenaida macroura*), Northern mockingbird (*Mimus polyglottos*), song sparrow (*Melospiza melodia*), turkey vulture (*Cathartes aura*), Anna's hummingbird (*Calypte anna*), common raven (*Corvus corax*), and blue-gray gnatcatcher (*Poliophtila caerulea*).

I certify that the information in this survey report and attached exhibits fully and accurately represent our work.

Sincerely,



Tommy Molioo
Permit # TE02412D-0

Att: A, Figure 1, Project Location
Figure 2a, Survey Routes for Site 1 West
Figure 2b, Survey Routes for Site 2 West
B, Site Photographs
C, Compendium of Wildlife Species Observed or Detected

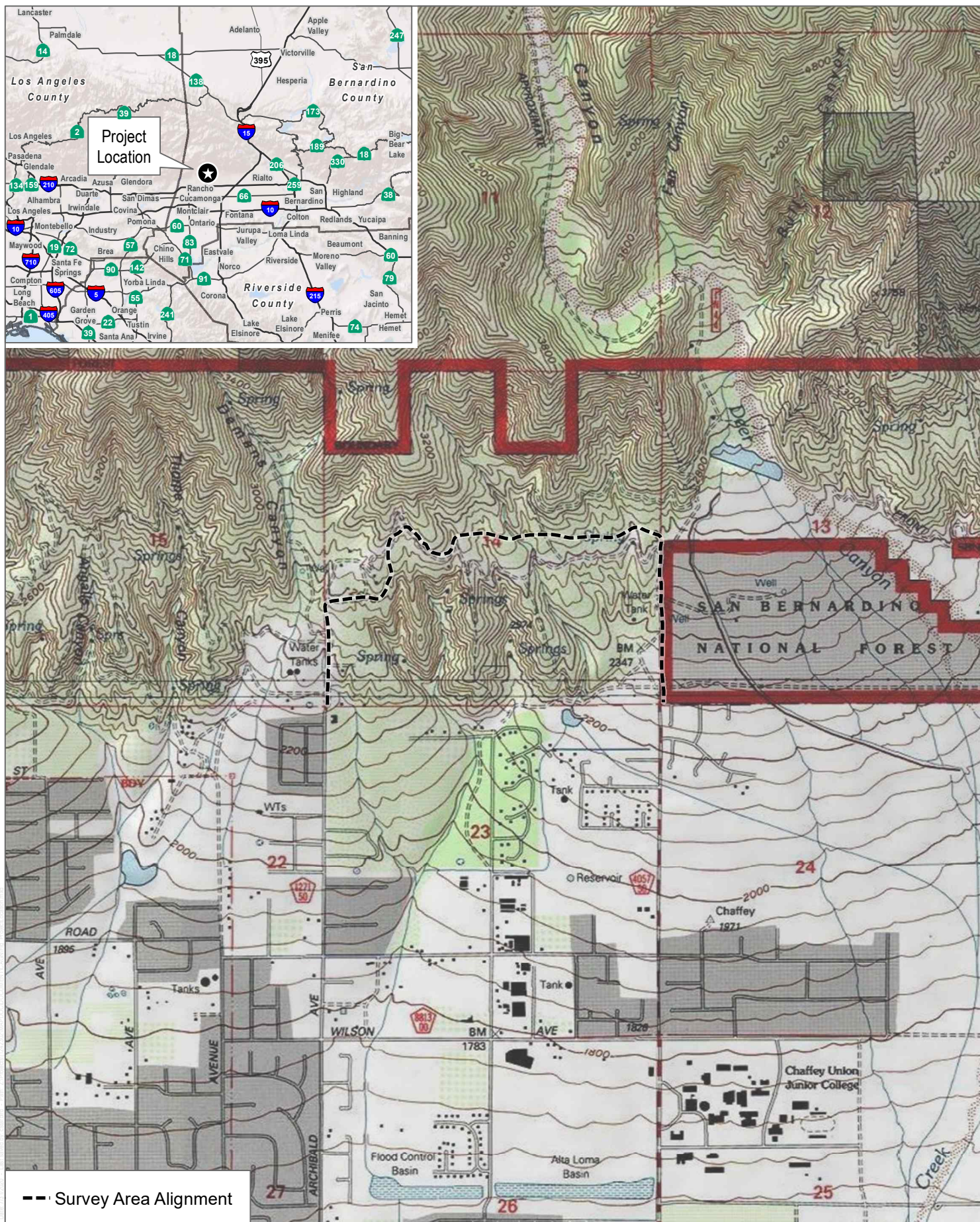
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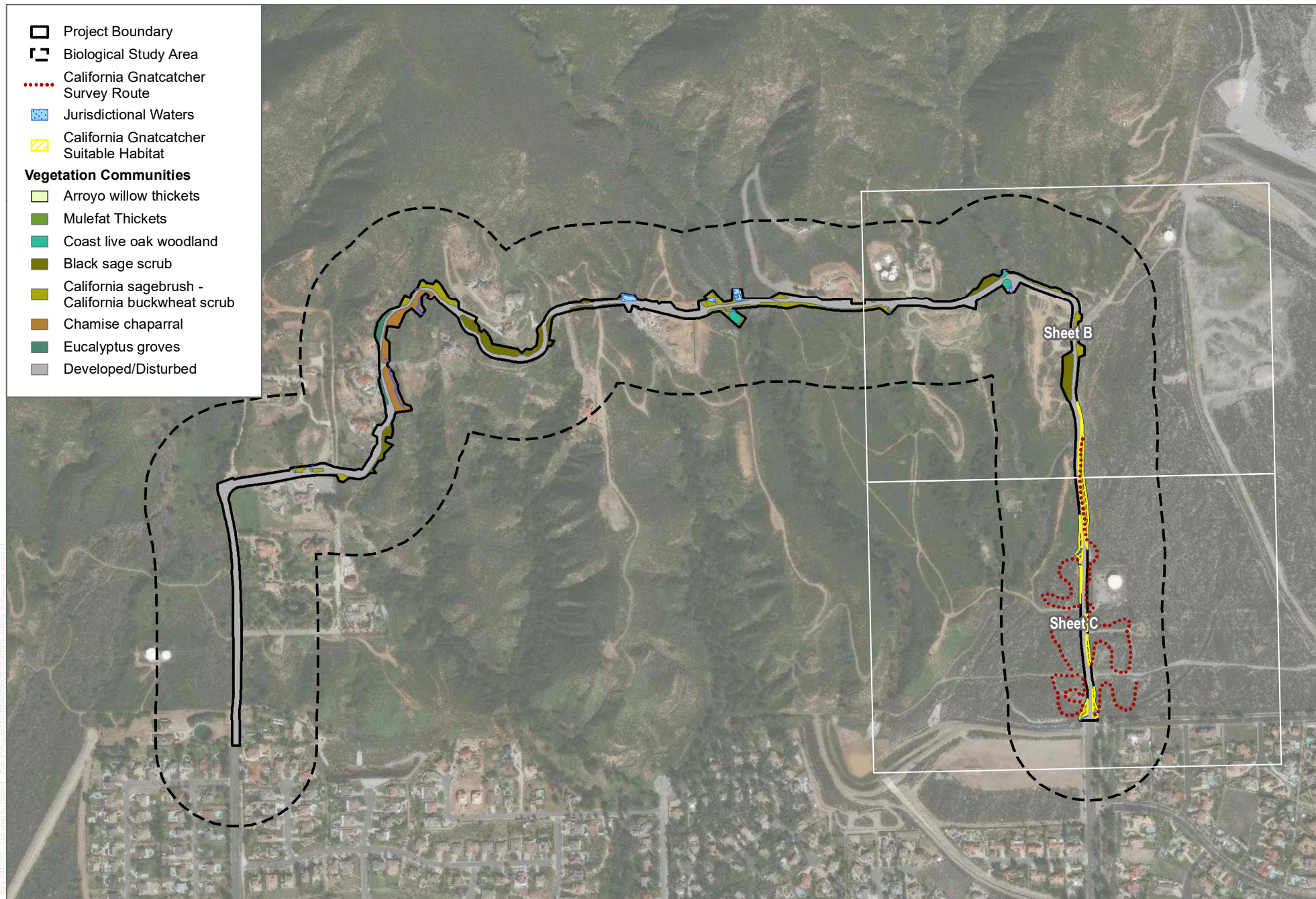


Attachment A

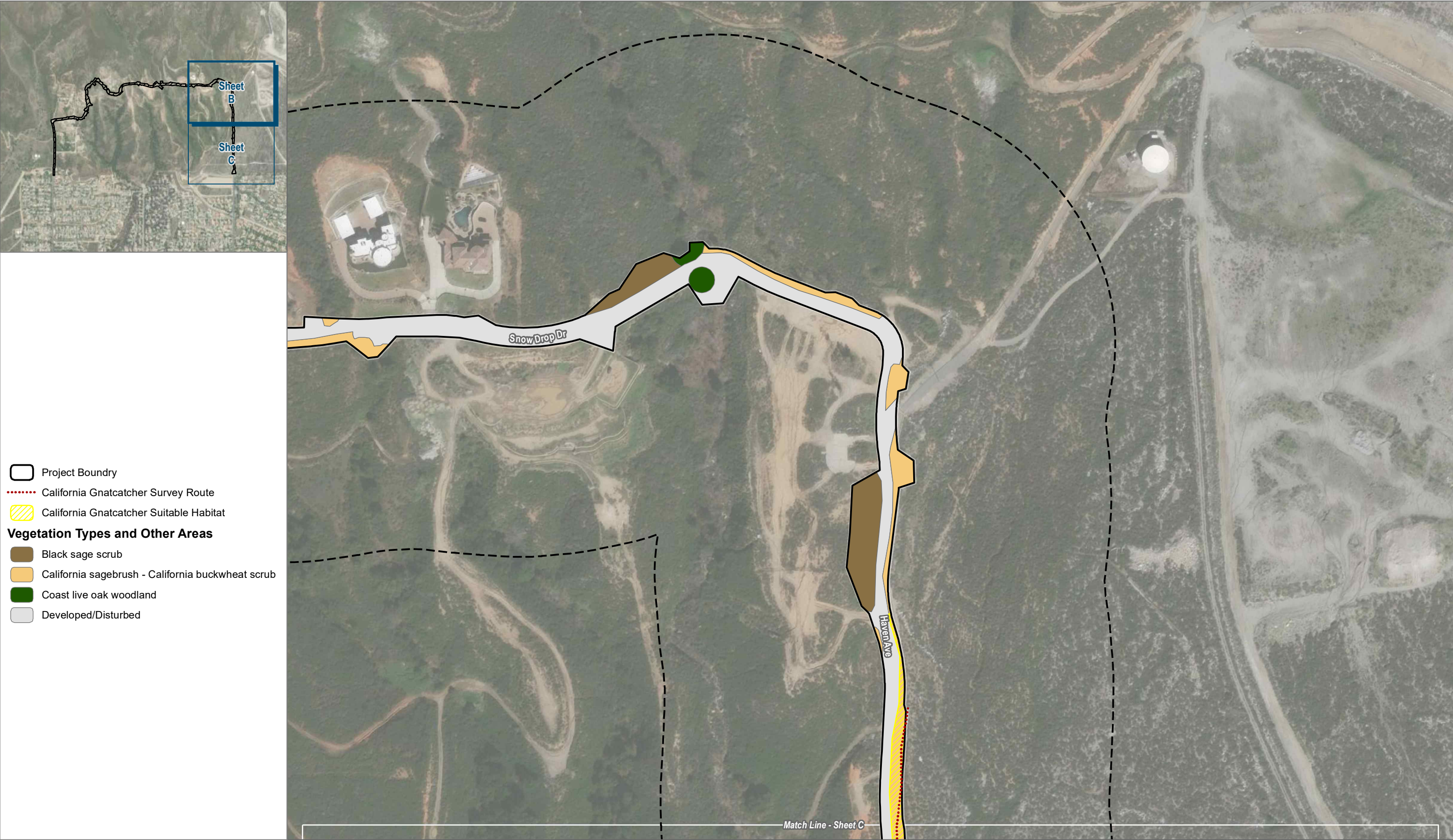
Figures



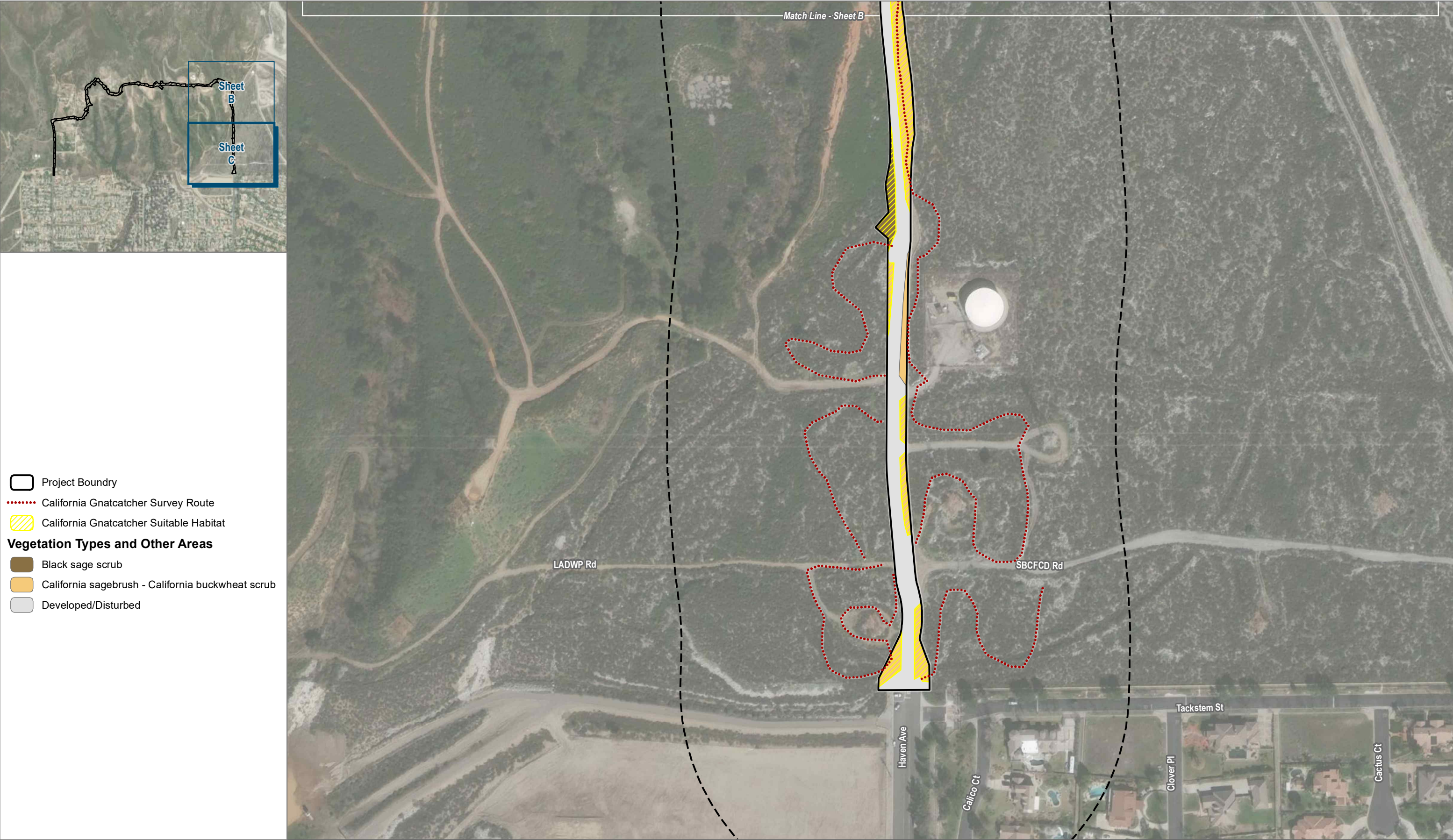
SOURCE: USGS 7.5-Minute Quadrangle, Cucamonga Peak CA
Township 01N, Range 07W, Section 14



SOURCE: Esri and Digital Globe Imagery, OpenStreetMap 2019



SOURCE: Esri and Digital Globe Imagery, OpenStreetMap 2019



SOURCE: Esri and Digital Globe Imagery, OpenStreetMap 2019



Attachment B

Site Photographs

Attachment B

Photo Documentation



Photo 1: Facing south from the southeast portion of the study area. Note CSS vegetation dominating the photo.



Photo 2: Facing east from the southeastern portion of the study area. Note CSS vegetation on adjacent sides of the gravel road.



Photo 3: Facing north along the western edge of Snowdrop Road with suitable CAGN habitat on the left.



Photo 4: Facing south along the northern extent of suitable CAGN habitat on the southeastern portion of Snowdrop Road.