

Addendum to the 2017 Final MND for the
Corporate Yard Facility Project
SCH No. 2017051029

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- 1 Project Location
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1 Introduction

This document is an Addendum to the 2017 Corporate Yard Project Final Mitigated Negative Declaration (MND) (SCH #2017051029) to address changes to the Originally Approved Project. The Final MND was adopted by the City of Pomona (City) in June 2017, which acted as the Lead Agency pursuant to the California Environmental Quality Act (CEQA) (CEQA Guidelines Title 14, California Code of Regulations, Section 15300 et. seq).

1.1 CEQA Requirements

Under CEQA, the Lead Agency is required to prepare an Addendum to a previously-adopted MND if some changes or additions are necessary to a prior adopted MND, but none of the conditions calling for preparation of a Subsequent MND have occurred (CEQA Guidelines Section 15164). Once an MND has been adopted, a Subsequent MND is only required when the Lead Agency determines that one of the following conditions has been met:

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 of 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 alternative 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.

CEQA recommends that a brief explanation of the decision to prepare an Addendum rather than a Subsequent MND be included in the record for a proposed project (CEQA Guidelines Section 15164(e)). This Addendum has been prepared because the Revised Proposed Project is consistent with the Originally Approved Project evaluated in the 2017 Final MND (SCH #2017051029).

The Revised Proposed Project does not require major revisions to the Final MND due to no new significant impacts or substantial increases in the severity of previously identified significant impacts. The anticipated environmental impacts of the Revised Proposed Project, as explained in detail in the following analysis and attached checklist, have been analyzed and mitigated accordingly in the previous Final MND prepared for the Corporate Yard Facility Project adopted in 2017, and there have been no new circumstances since that time that would result in new or more severe significant environmental impacts. Lastly, as evaluated in the supporting analysis of this Addendum, mitigation measures that have been previously identified would adequately reduce impacts to less than significant levels. Those mitigation measures that have been identified in the Final MND and are applicable to the Revised Proposed Project are identified within this analysis.

Per CEQA Guidelines Section 15163(c) or (e), an Addendum need not be circulated for public review, but can be included in or attached to the Final MND. Prior to approval of the Revised Proposed Project, the City will consider this Addendum together with the 2017 Final MND when making a decision regarding the Revised Proposed Project.

1.2 Project Overview

The City of Pomona (City) is proposing to modify the 2017 Originally Approved Corporate Yard Facility Project (Originally Approved Project) to incorporate the reconstruction of the collapsed Pomona Stables Structure, located approximately 700 feet east of the project site, into the Revised Proposed Project. As such, the City is preparing this Addendum to the adopted 2017 Final MND to demonstrate that no new or substantially more severe environmental impacts would occur with implementation of the Revised Proposed Project such that a new environmental analysis, pursuant to CEQA Guidelines Section 15162 would be required.

1.3 Project Background

In June 2017, the City approved the Pomona Corporate Yard Facility Project (Originally Approved Project) and adopted the Final Mitigated Negative Declaration (MND) for the Originally Approved Project. The Originally Approved Project involved the demolition of the existing Corporate Yard, located at 148 North Huntington Avenue, the remediation of this site, and the reconstruction of a new Corporate Yard Facility for the City of Pomona Water Resources Department (Department). Since approval of the Originally Approved Project, some remediation at the project site has been completed and some buildings have been removed. In 2020, the City's Historic Advisory Commission and the City Council asked the Department to redesign the project to relocate, rebuild, and reuse, to the extent feasible, materials from the adjacent and collapsed City Stables Structure.

2 Project Description

2.1 Project Location and Setting

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

2.2 Description of Approved Project

In June 2017, the City approved the Pomona Corporate Yard Facility Project (Originally Approved Project) and adopted the Final Mitigated Negative Declaration (MND) for the Originally Approved Project. The Originally Approved Project involved the demolition of the existing Corporate Yard, located at 148 North Huntington Avenue, the remediation of this site, and the reconstruction of a new Corporate Yard Facility for the City of Pomona Water Resources Department (Department), as shown in Figure 2, Originally Approved Site Plan. Since approval of the Originally Approved Project, some remediation at the project site has been completed and some buildings have been removed. In 2018, the City's Historic Advisory Commission and the City Council asked the Department to redesign the project to relocate, rebuild, and reuse, to the extent feasible, materials from the adjacent and collapsed City Stables Structure. The Originally Approved Project included the following six (6) phases:

Phase 1 – Relocation of Annex Operations

To accommodate the cleanup activities associated with the former manufactured gas plant (MGP) at the project site, the first phase of the Originally Approved Project involved the relocation of operations within the Annex Lot to three different locations: the First Street Lot, the Water Yard Lot, and the Sewer Lot.. These three sites now jointly house Annex Lot operations. No employees report to the First Street Lot or Sewer Lot during interim operations; these sites are used solely for storage of vehicles, materials, and equipment used on an as-needed and sporadic basis. All work activities are performed on the existing Water Yard Lot, which is immediately east of and adjacent to the Annex Lot. Phase 1 has been completed.

Phase 2 – Remediation of Annex Lot

The California Department of Toxic Substances Control (DTSC) conducted remediation activities that included the excavation, removal and hauling of approximately 10,000 cubic yards (CY) of contaminated soils from the project site. The major chemicals of potential concern for this site were carcinogenic polycyclic aromatic hydrocarbons (carcinogenic PAHs), polycyclic aromatic hydrocarbons (PAHs), total petroleum hydrocarbons (TPH), arsenic, lead, and volatile organic compounds (VOCs). Visual indications of lampblack, a by-product of the MGP operations, were previously observed during the investigative phase of work. Chemicals of potential concern found in lampblack are primarily PAHs. Other MGP residues may include metals, spent oxide, feedstock oil, and oil sludge. Spent oxide,

used to purify the gas, may have residues containing cyanides. Feedstock oil and oil sludge from storage tanks or vaults may contain PAHs and aromatic compounds (benzene, toluene, ethylbenzene, and total xylenes (BTEX)). This remediation has been completed, and the Annex Lot is currently undeveloped and covered with gravel.

Phase 3 – Annex Lot Construction

Phase 3 of the Originally Approved Project involved the City constructing a new two-story administration building, an employee support and training building, and new warehouse facilities.

Phase 4 – Relocation of Water Yard Operations

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

Phase 5 – Remediation of Water Yard

Under the Originally Approved Project, the proposed excavation and backfilling operations of the Water Yard would occur after remediation of the Annex Lot and relocation of Water Yard operations to the Annex Lot.

Phase 6 – Water Yard Construction

Under the Originally Approved Project, upon completion of the remediation activities on the Water Yard Lot, the City was to construct new shop buildings, materials storage areas, and both covered and uncovered parking for vehicles and equipment.

Table 1 provides an overview of the approximate timeframe for each phase of the Originally Approved Project.

Table 1. Originally Approved Project - Phased Construction Timeline

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

2.3 Current Conditions at Project Site

As discussed above, Phases 1 and 2 of the Originally Approved Project have been implemented. These include completion of Phase 1, which involved the relocation of the Annex Lot Operations to the First Street Lot, the Water Yard Lot, and the Sewer Lot, and Phase 2, remediation at the Annex Lot. Table 2 summarizes which buildings currently exist on the project site; Buildings 1 and 2 have been demolished.

Table 2. Existing Buildings

Building	Type	Use	Approx. Year Built	Approx. Square Footage
3	Office	Offices, lunchroom, and restroom	1930s	3,950
4	Warehouse	Offices, equipment, and material storage	1890s	7,600
5	Open Bay	Workshop and material storage	1955s	7,106
5-A	Auto	Workshop (dynamometer)	1960s	2,520
6	Restroom	Restroom, locker room	1940s	820
7	Trailer	Offices	2012	1,100
8	Enclosed	Workshop (welding)	1950s	640

2.4 Revised Proposed Project

The Revised Proposed Project would be similar to the Originally Approved Project; however, the primary change is that the collapsed City Stables Structure, located approximately 700 feet east of the project site, would be reconstructed on the Annex Lot of the project site. Figure 3, Revised Proposed Project Site Plan, includes the site plan as currently proposed. As discussed above, Phases 1 and 2 of the Originally Proposed Project have been completed. Therefore, the Revised Proposed Project would specifically involve the following phases:

- Phase 3 – Project Construction
- Phase 4 – Relocation of Department Operations
- Phase 5 – Remediation of Water Yard
- Phase 6 – Paving and Circulation Improvements on Water Yard

Details for each of these phases is provided below.

Phase 3 – Project Construction

Remediation activities have been completed by SoCalGas under DTSC oversight on the Annex Lot. Under the Revised Proposed Project, the City would construct the following:

Reconstructed City Stables: The reconstruction of the collapsed City Stables building would occur in the western portion of the project site. Reconstruction would involve salvaging and reusing materials from the collapsed structure to the extent feasible. The reconstructed City Stables would become an office building and would be 4,300 square feet (sf) in size. Renovation and reconstruction would include removing and salvaging bricks, cupolas, ironworks and signages, to be reused in the reconstructed building at the project site.

The reconstructed City Stables is being designed for ground-up new construction. The completed building would visually represent a reconstruction of the dilapidated and collapsed City Stables located on the eastern edge of the existing Water Resources Department campus.

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

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

Administration Building: Immediately east of the Reconstructed City Stables would be the Administration Building. The Administration Building would be approximately 10,850 sf in size and house cubicles and offices for Department staff, conference and meeting rooms, restrooms, and a kitchen and break room.

Warehouse: The easternmost building would be the Warehouse, which would total approximately 9,780 sf and include restrooms and locker rooms, as well as storage and loading areas for Department supplies.

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

Phase 4 – Relocate Department Operations

As discussed under Phase 2 above, the Annex Lot has successfully undergone remediated. Once Annex Lot construction is complete, uses located on the Water Yard, including warehouse space, administration and parking, would be permanently relocated to the new facilities on the Annex Lot.

Phase 5 – Remediation of Water Yard

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

Phase 6 – Paving and Circulation Improvements on Water Yard

Upon completion of the remediation activities to be undertaken by the SoCalGas with DTSC oversight on the Water Yard Lot, the City would pave the Water Yard site and include surface parking and circulation improvements for Department vehicles on this portion of the project site. No new structures would be constructed on the Water Yard; this portion of the project site would solely be utilized by Department vehicles.

Table 3 summarizes the differences between the Originally Approved Project and the Revised Proposed Project. As briefly summarized herein, the Revised Proposed Project concentrates all new building construction within Phase 3 as opposed to during both Phase 3 and Phase 6 of the Originally Approved Project. All other construction and operational activities for the Revised Proposed Project remain the same as those anticipated and evaluated for the Originally Approved Project. Upon ultimate buildout, the Revised Proposed Project would result in the construction of 21,800 sf, while the Originally Approved Project would have resulted in the construction of 35,650 sf. As such, the Revised Proposed Project ultimately results in less new construction when compared to the Originally Approved Project.

Table 3. Comparison of Originally Approved Project and Revised Proposed Project

Phase	Originally Approved Project	Revised Proposed Project
1	Relocation of Annex Operations <ul style="list-style-type: none"> First Street Lot Sewer Yard Water Yard 	Relocation of Annex Operations <ul style="list-style-type: none"> First Street Lot Sewer Yard Water Yard
2	Remediation of Annex Lot <ul style="list-style-type: none"> Removal and hauling of approximately 10,000 cubic yards (CY) of contaminated soils 	Remediation of Annex Lot <ul style="list-style-type: none"> Removal and hauling of approximately 10,000 cubic yards (CY) of contaminated soils
3	Annex Lot Construction (20,000 sf) <ul style="list-style-type: none"> Surface Parking Administration Building: 8,500 sf Employee Training: 4,000 sf Warehouse: 7,500 sf 	Project Construction (24,930 sf) <ul style="list-style-type: none"> Surface Parking Reconstructed City Stables: 4,300 sf Administration Building: 10,850 sf Warehouse: 9,780 sf
4	Relocate Water Yard Operations <ul style="list-style-type: none"> Partial permanent relocation Partial temporary relocation 	Relocate Department Operations <ul style="list-style-type: none"> Complete permanent relocation
5	Remediation of Water Yard <ul style="list-style-type: none"> Remediation to last 75 working days 	Remediation of Water Yard <ul style="list-style-type: none"> Remediation to last 75 working days
6	Water Yard Construction (15,650 sf) <ul style="list-style-type: none"> Shop buildings: 8,050 sf Materials storage areas: 3,500 sf Bins and recycling: 4,100 sf Parking for vehicles and equipment. 	Paving and Circulation Improvements on Water Yard <ul style="list-style-type: none"> Parking for vehicles and equipment Circulation improvements No new buildings

2.5 Operations

Once constructed, the Revised Proposed Project would be developed with the rebuilt City Stables and associated Plaza, an administration building, a Supervisory Control and Data Acquisition (SCADA) Tower, a warehouse building, a shaded area between the warehouse building and administration building, and an associated surface parking lot (See Figure 3).

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

2.6 Summary of Environmental Effects, Mitigation Measures, and Level of Significance after Mitigation for the Originally Approved Project

Impacts Determined to be Below a Level of Significance

The adopted MND identified that the Originally Approved 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
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Utilities and service systems

Impacts Determined to be Below a Level of Significance with Mitigation Measures

Impacts related to the following issue areas were determined to be potentially significant absent mitigation; however, with incorporation of mitigation measures, these issue areas could be less than significant:

- Biological Resources
- Cultural Resources
- Geology and Soils
- Noise
- Tribal Cultural Resources

The mitigation measures identified below were provided for the Originally Approved Project and were determined to reduce impacts in these categories to below a level of significance. The mitigation measures below were implemented during Phase 1 and Phase 2 and would continue to apply to the Revised Proposed Project, as applicable and as identified in Section 3 of this addendum.

Biological Resources

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

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

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

Cultural Resources

- MM-CUL-1** To prevent effects to cultural resources, tailgate cultural resource training is recommended for all on-site construction crew personnel prior to ground disturbance. In the event any archaeological or historical resources or objects of interest to Native American tribes are uncovered during earthmoving remediation activities, the remediation contractor will cease activity in the area of the find until the discovery can be evaluated by a qualified archaeologist or a Tribe-appointed monitor, and appropriate control measures, if necessary, are implemented. Implementation of this procedure during the course of the proposed project would reduce potentially significant effects on archaeological resources to a less than significant level.

Geology and Soils

- MM-GEO-1** Prior to issuance of grading, construction, or building permits, the City's Building Official and the City Engineer shall review and approve all geotechnical aspects of the project construction and grading plans to ensure compliance with the General Plan, California Building Code, and other local codes.

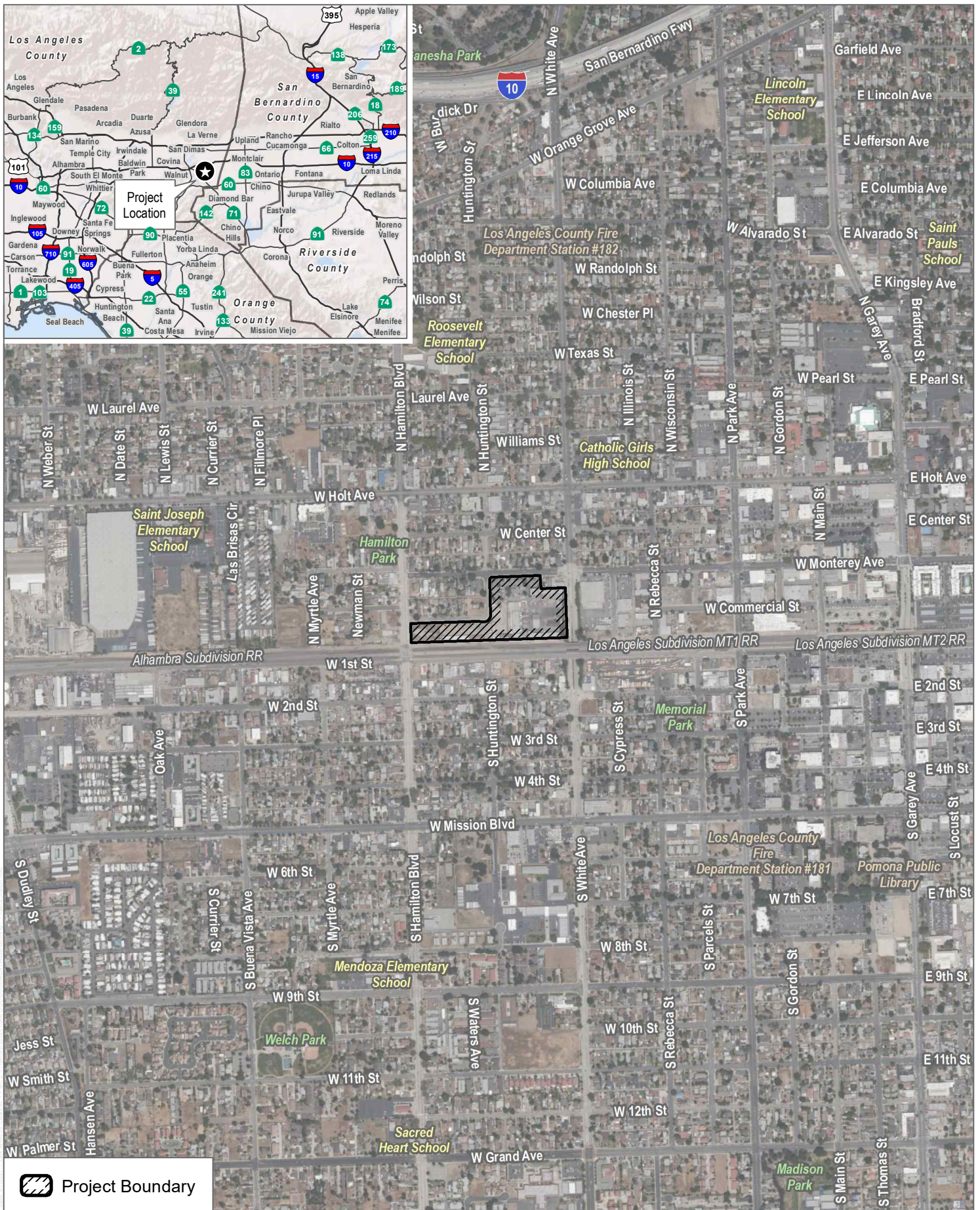
Noise

- MM-NOI-1** Construction activities shall take place between the hours of 7:00 a.m. and 8:00 p.m. and not at all during other hours or on Sundays or federal holidays, in compliance with Section 18.305 of the City of Pomona Noise Ordinance. This condition shall be listed on the project's final design to the satisfaction of the City of Pomona Planning Division.
- MM-NOI-2** The City shall adhere to the following measures as a condition of approving the grading permit:
- The project contractor shall, to the extent feasible, schedule construction activities to avoid the simultaneous operation of construction equipment, so as to minimize noise levels resulting from operating several pieces of equipment emitting high levels of noise.
 - All construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers.
 - Construction noise reduction methods, such as shutting off idling equipment, construction of a temporary noise barrier, maximizing the distance between construction equipment staging areas and adjacent residences, and use of electric air compressors and similar power tools, rather than diesel equipment, shall be used where feasible.
 - During construction, stationary construction equipment shall be placed such that emitted noise is directed away from or shielded from sensitive receptors.

- Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding property owners to contact the job superintendent if necessary. In the event the City receives a complaint, appropriate corrective actions shall be implemented and a report of the action provided to the reporting party.

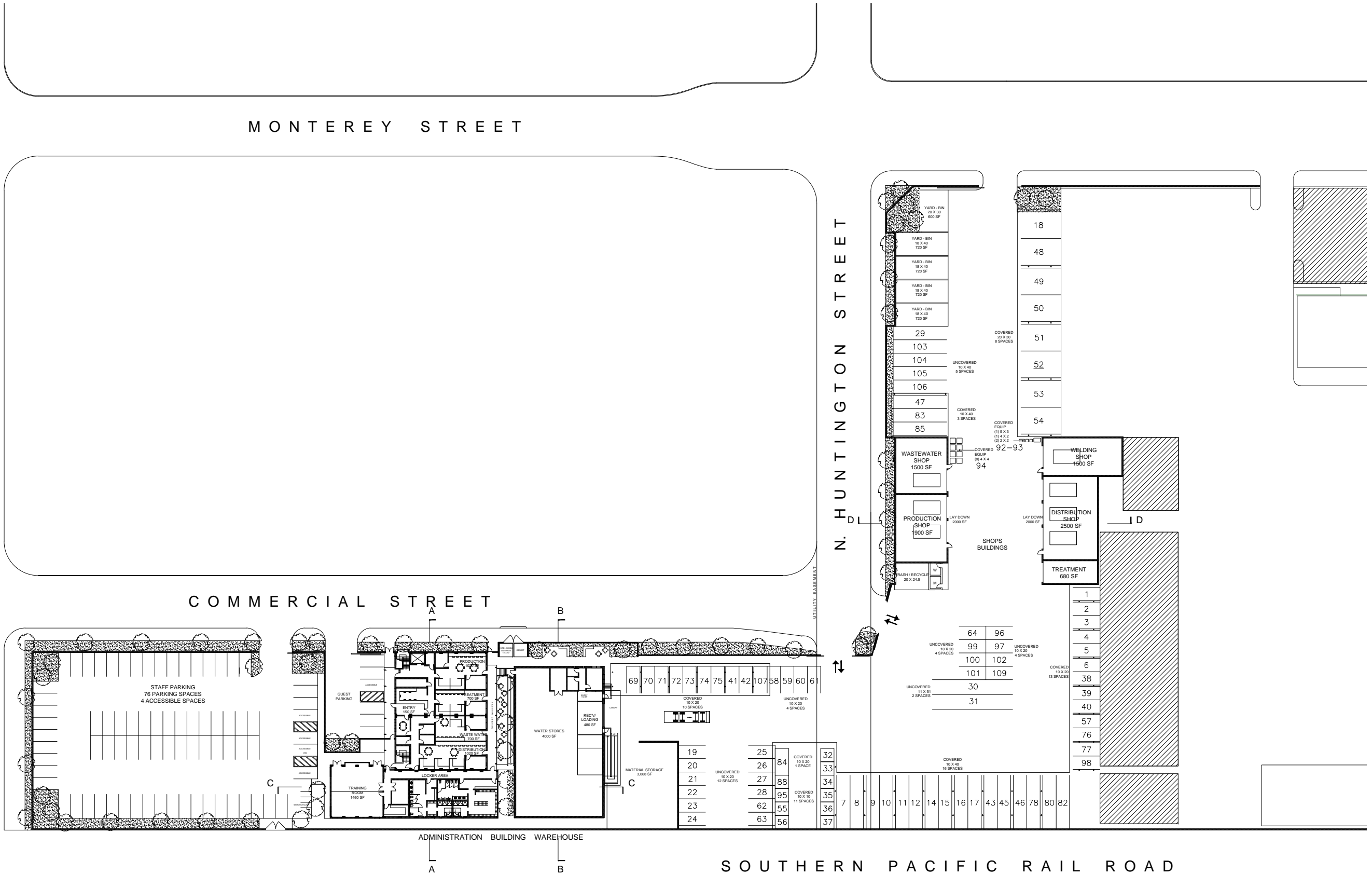
Tribal Cultural Resources

- MM-TCR-1** If any potential pre-historic or historic-era material are discovered during excavation activities, all work in that area will be halted or diverted until a qualified archaeologist can evaluate the nature and significance of the finds. If the materials are found to be Native American in origin, immediately contact any of the Tribal Contacts on the list provided by NAHC to alert them of the discovery. DTSC staff and property owner are also to be immediately notified and informed of this situation. After discussion with any of the Tribal Contacts and/or their respective Cultural Resource Managers and in collaboration with DTSC (including the Office of Environmental Justice and Tribal Affairs) and the property owner, implement any measures deemed necessary to record and/or protect the pre-historic or historic resources.
- MM-TCR-2** The contractors performing the removal activities on the Site are to be alerted to be observant and aware that they may encounter potential Native American cultural or archaeological resources and/or human remains.
- MM-TCR-3** In the event of an accidental discovery or recognition of any human remains during ground disturbing activities, excavation or disturbance of the site shall stop immediately and the County Coroner notified to determine its origin. The coroner will determine disposition within 48 hours. If the remains are Native American, the coroner will be responsible for contacting the NAHC within 24 hours. The NAHC will identify and notify the person(s) who might be the likely descendent (MLD) who will make recommendations for the appropriate and dignified treatment of the remains (Public Resources Code, Section 5097.98). The descendants shall complete their inspection and make recommendation or preferences for treatment within 48 hours of being granted access to the Site (CEQA Guidelines, CCR section 15064.5(e); HSC section 7050.5).
- MM-TCR-4** In the event of an accidental discovery of potential cultural or archaeological resources, immediately suspend excavation activities in the immediate area and surrounding 50 feet until a qualified archaeologist can evaluate the nature and significance of the discovery. Immediately contact any of the Tribal Contacts on the list provided by NAHC to alert them of the discovery. DTSC staff and property owner are also to be immediately notified and informed of this situation. After discussion with any of the Tribal Contacts and/or their respective Cultural Resources Managers and in collaboration with DTSC (including the Office of Environmental Justice and Tribal Affairs) and the property owner, implement any measures deemed necessary to record and/or protect the cultural or archaeological resources.



SOURCE: Bing Aerials (accessed 2020), OpenStreetMap 2019

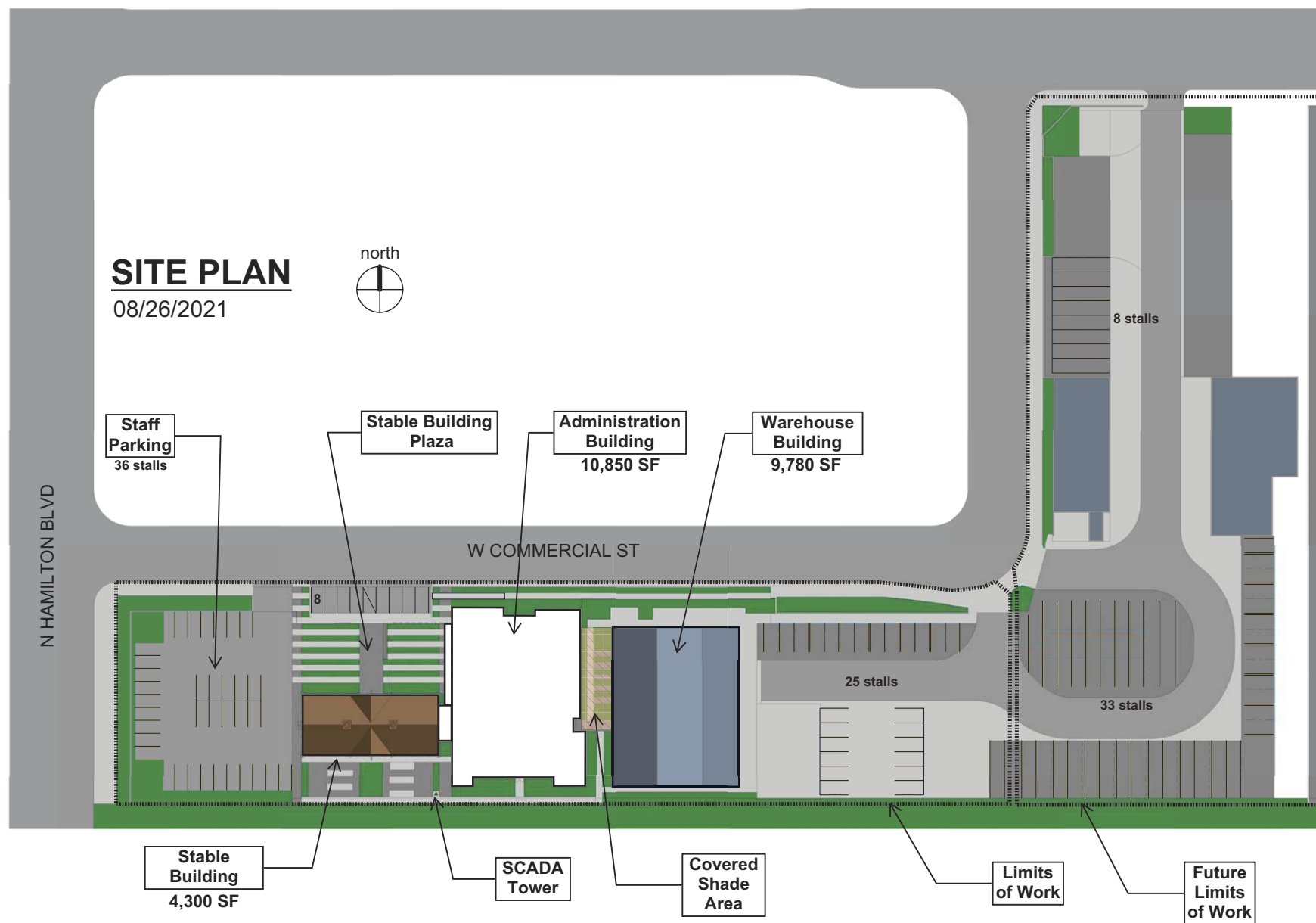
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SOURCE: City Of Pomona 2016, Gonzalez Goodale Architects 2016

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SOURCE: Sillman Wright Architects 2021

FIGURE 3

Revised Proposed Project Site Plan

Addendum to the 2017 Final MND for the Corporate Yard Facility Project

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3 Environmental Checklist

The following discussion of potential environmental effects was completed in accordance with Section 15063(d)(3) of the CEQA Guidelines (2016) to determine if the modified project may have a significant effect on the environment that was not identified in the certified EIR. As noted above in Section 1.1 of this addendum, the threshold questions presented below are from the version of Appendix G of the CEQA Guidelines that was in place at the time of the EIR. However, updates to the analysis are incorporated where necessary, to reflect current (2021) standards and regulations. Any such changes are described in the analysis and/or in the subsections below entitled “Changes in Circumstance/New Information.”

1. Project title:

Addendum to the 2017 Final MND for the Corporate Yard Facility Project

2. Lead agency name and address:

City of Pomona, Water Resources Department
148 North Huntington Street
Pomona, California 91768

3. Contact person and phone number:

Chris Diggs
909.892.7412

4. Project location:

148 North Huntington Street
Pomona, California 91768

5. Project sponsor’s name and address:

City of Pomona, Water Resources Department
Chris Diggs
148 North Huntington Street
Pomona, California 91768
909.892.7412

6. General plan designation:

Urban Neighborhood

7. Zoning:

The Sewer Lot (APN 8348-013-903) is zoned Commercial Industrial; the Annex and Water Yard Lots (APNs 8340-032-909, 8348-013-901, and 8348-013-902) are zoned Publicly Owned Land

8. Description of project:

See Section 2 above

9. Surrounding land uses and setting:

Two of the three portions of the project site are developed with buildings, structures, and infrastructure associated with the existing water operations department. Approximately 75 City employees currently work at the project site. The project site consists of four parcels, three of which are developed with warehouses and maintenance yards used by the City's Water/Wastewater Operations (WWO) Department: the Water Yard (APN 8340-032-909), which is 1.77 acres; and the Annex (APNs 8348-013-901 and 8348-013-902), which is 1.32 acres. The fourth parcel (APN 8348-013-903), the Sewer Lot, comprises 0.69 acres.

10. Other public agencies whose approval is required:

City of Pomona Project Approval

California Department of Toxic Substances Control

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, has consultation begun?

In March 2021, the City issued a Notice of Preparation (NOP) indicating that an Environmental Impact Report (EIR) would be prepared for the Revised Proposed Project; however, since that time, the City has determined that the preparation of an EIR is not required. Upon initiating the EIR process, the City initiated tribal consultation pursuant to Assembly Bill (AB) 52. In response to the tribal consultation letters sent in early 2021, the Gabrieleno Band of Mission Indians - Kizh Nation requested consultation. In June 2021 and July 2021, the City underwent consultations with the Gabrieleno Band of Mission Indians - Kizh Nation, and based on the outcome of those consultations, it was determined that modifications to the mitigation measures focused on tribal cultural resources are appropriate. Details are included within Section 3.18, Tribal Cultural Resources, of this Addendum.

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

Environmental Factors Potentially Affected

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

- | | | |
|---|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> 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 and Traffic | <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Mandatory Findings of Significance |

Determination

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☒ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Vinny Tam, Senior Planner

Signature

9/8/2021

Date

Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significance

3.1 Aesthetics

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
I. AESTHETICS – Except as provided in Public Resources Code Section 21099, would the project:			
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>

Originally Approved Project Impacts

As discussed in the 2017 Final MND for the Originally Approved Project, the Corporate Yard Facility project would result in no impacts to scenic vistas or scenic resources within a state scenic highway. The Originally Approved Project was determined to result in less than significant impacts related to the degradation of the existing visual character of the project site and surrounding areas and the incorporation of light and glare impacts.

Revised Proposed Project Analysis

The Originally Approved Project involved site remediation and the buildout of a new approximately 35,650 square foot Corporate Yard Facility for the Department of Water Resources. Since approval of the project in 2017, changes to the project design have been made. The Revised Proposed Project now includes the same site remediation and the buildout of a new approximately 24,930-square-foot Corporate Yard Facility, including the reconstruction of the collapsed City Stables on the project site.

As with the Originally Approved Project, the Revised Proposed Project would therefore continue to result in no impacts to scenic vistas or scenic resources within a state scenic highway. Because the Revised Proposed Project would be constructed on the same site as the Originally Approved Project and incorporate the same uses, in a more compact development footprint, the Revised Proposed Project would result in similar changes to the existing visual character of the project site and surrounding uses as well as introduce similar levels of nighttime lighting with the same potential to result in less-than-significant light and glare impacts.

As such, impacts would remain less than significant for generally the same reasons as described in the adopted MND. The Revised Proposed Project would not, therefore, result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects in the category aesthetics, and no new or different mitigation measures are required.

3.2 Agriculture and Forestry Resources

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
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 checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<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 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 checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Originally Approved Project Impacts

As discussed in the 2017 Final MND for the Originally Approved Project, the Corporate Yard Facility project would result in no impacts to agriculture and forestry resources. The project site is not located in an agricultural zone, and no agricultural land is adjacent to the site. The site is located in an urban area of the City and is not identified as having prime soils nor is the site zoned for agricultural use.

Revised Proposed Project Analysis

The Originally Approved Project involved site remediation and the buildout of a new approximately 35,650 square foot Corporate Yard Facility for the Department of Water Resources. Since approval of the project in 2017, changes to the project design have been made. The Revised Proposed Project now includes the same site remediation and the buildout of a new approximately 24,930-square-foot Corporate Yard Facility, including the reconstruction of the collapsed City Stables on the project site. Given that no agricultural resources or activities current exist on the site or in the surrounding area and that the same type of project and use would be constructed and operated under the Revised Proposed Project, no impacts would occur for generally the same reasons as described in the adopted MND. The Revised Proposed Project would not, therefore, result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects in the category agriculture and forestry resources, and no new or different mitigation measures are required.

3.3 Air Quality

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:			
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Originally Approved Project Impacts

As discussed in the 2017 Final MND for the Originally Approved Project, the Corporate Yard Facility project would result in less than significant air quality impacts during remediation, construction, and operation. No mitigation measures were required for any of these phases of remediation, construction, and operation in order to reduce criteria air pollutant concentrations to a level below significance.

Revised Proposed Project Analysis

The Originally Approved Project involved site remediation and the buildout of a new approximately 35,650 square foot Corporate Yard Facility for the Department of Water Resources. Since approval of the project in 2017, changes to the project design have been made. The Revised Proposed Project now includes the same site remediation and

the buildout of a new approximately 24,930-square-foot Corporate Yard Facility, including the reconstruction of the collapsed City Stables on the project site. Given that a smaller scale project would be constructed on the same site, air quality impacts for the Revised Proposed Project during construction and operation would be reduced when compared to the Originally Approved Project. The same remediation activities would occur under the Revised Proposed Project, and as such, the same air quality impacts would occur during remediation.

Because the 2017 MND for the Originally Approved Project demonstrated that no criteria air emission thresholds would be exceeded, and because the Revised Proposed Project would be smaller in scale than the Originally Approved Project, no new or more severe air quality impacts would occur under the Revised Proposed Project, and no new or different mitigation measures are required.

3.4 Biological Resources

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
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"/>
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"/>
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"/>
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 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 checked="" type="checkbox"/>

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
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 checked="" type="checkbox"/>

Originally Approved Project Impacts

As discussed in the 2017 Final MND for the Originally Approved Project, the Corporate Yard Facility project would result in less than significant biological resources impacts during remediation, with incorporation of the following mitigation measure MM-BIO-1, specifically addressing the potential presence of the western yellow bat, big free-tailed bat, and western mastiff bat. All other biological resources impacts during remediation, construction, and operation would be less than significant.

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

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

warm (for winter hibernacula) for bats to exit the roost. This action should allow all bats to leave during the course of 1 week. If a roost needs to be removed and a qualified biologist determines that the use of one-way doors is not necessary, the roost shall first be disturbed following the direction of the qualified biologist at dusk to allow bats to escape during the darker hours. Once the bats escape, the roost site shall be removed or the construction disturbance shall occur the next day (i.e., there shall be no less or more than 1 night between initial disturbance and the roost removal).

No mitigation measures were required to address potential impacts to candidate, sensitive, or special status species, riparian habitat or other sensitive natural communities, federally protected wetlands, the movement of any native resident or migratory fish or wildlife species, tree preservation, or conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Revised Proposed Project Analysis

The Originally Approved Project involved site remediation and the buildout of a new approximately 35,650 square foot Corporate Yard Facility for the Department of Water Resources. Since approval of the project in 2017, changes to the project design have been made. The Revised Proposed Project now includes the same site remediation and the buildout of a new approximately 24,930-square-foot Corporate Yard Facility, including the reconstruction of the collapsed City Stables on the project site. Under the Revised Proposed Project, the same remediation would be required, and as such, mitigation measure MM-BIO-1, would still be required prior to demolition of existing structures and prior to the onset of on-site remediation activities.

The remainder of the Revised Proposed Project involves the construction and operation of a smaller scale project on the same site as the Originally Approved Project. As such, the Revised Proposed Project would result in the same less-than-significant biological resources impacts to candidate, sensitive, or special status species, riparian habitat or other sensitive natural communities, federally protected wetlands, the movement of any native resident or migratory fish or wildlife species, tree preservation, or conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. The Revised Proposed Project would not, therefore, result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects in the category biological resources, and no new or different mitigation measures are required.

3.5 Cultural Resources

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
V. CULTURAL RESOURCES – Would the project:			
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Originally Approved Project Impacts

As discussed in the 2017 Final MND for the Originally Approved Project, the Corporate Yard Facility project would result in no impacts to historical resources impacts during remediation, construction, and operation. However, during remediation there is the potential for impacts and thus the need to implement mitigation measure MM-CUL-1, as detailed below. All other cultural resources impacts would be less than significant.

- MM-CUL-1** To prevent effects to cultural resources, tailgate cultural resource training is recommended for all on-site construction crew personnel prior to ground disturbance. In the event any archaeological or historical resources or objects of interest to Native American tribes are uncovered during earthmoving remediation activities, the remediation contractor will cease activity in the area of the find until the discovery can be evaluated by a qualified archaeologist or a Tribe-appointed monitor, and appropriate control measures, if necessary, are implemented. Implementation of this procedure during the course of the proposed project would reduce potentially significant effects on archaeological resources to a less than significant level.

Revised Proposed Project Analysis

The Originally Approved Project involved site remediation and the buildout of a new approximately 35,650 square foot Corporate Yard Facility for the Department of Water Resources. Since approval of the project in 2017, changes to the project design have been made. The Revised Proposed Project now includes the same site remediation and the buildout of a new approximately 24,930-square-foot Corporate Yard Facility, including the reconstruction of the collapsed City Stables on the project site. While the City Stables has previously listed on the National Register of Historic Resources, since its listing, the structure has collapsed and no longer retains the historic integrity that was present at the time of the listing of the structure. As detailed in Attachment 1, Stables Determination Letter, to this document, due to the loss of the east gable end, and half of the building and roof, which contain most of the character defining features of the building, the loss of so many of the character-defining features has impaired the building's architectural integrity and its ability to convey its significance, making it no longer eligible for designation as a local historic landmark or listing on the National Register of Historic Places. Since it is no longer eligible for listing in the National Register of Historic Places or designation as a local historic landmark, it is not historic under the CEQA guidelines. As such, the relocation and reconstruction of portions of the City Stables would not result in a substantial adverse change in the significance of a historical resource pursuant to §15064.5, and historic resource impacts would be less than significant.

With regard to potential impacts to archaeological resources, during remediation and construction, the Revised Proposed Project would still be required to comply with MM-CUL-1, as outlined above, in order to reduce potentially significant impacts to a less than significant level.

The remainder of the Revised Proposed Project involves the construction and operation of a smaller scale project on the same site as the Originally Approved Project. As such, the Revised Proposed Project would result in the same less-than-significant cultural resources impacts. The Revised Proposed Project would not, therefore, result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects in the category cultural resources, and no new or different mitigation measures are required.

3.6 Energy

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
VI. ENERGY – Would the project:			
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Originally Approved Project Impacts

As discussed in the 2017 Final MND for the Originally Approved Project, the Corporate Yard Facility project would result in less than significant energy impacts during remediation, construction, and operation. No mitigation measures were required for any of these phases of remediation, construction, and operation in order to reduce energy impacts to a level below significance.

Revised Proposed Project Analysis

The Originally Approved Project involved site remediation and the buildout of a new approximately 35,650 square foot Corporate Yard Facility for the Department of Water Resources. Since approval of the project in 2017, changes to the project design have been made. The Revised Proposed Project now includes the same site remediation and the buildout of a new approximately 24,930-square-foot Corporate Yard Facility, including the reconstruction of the collapsed City Stables on the project site. Given that a smaller scale project would be constructed on the same site, energy impacts for the Revised Proposed Project during construction and operation would be reduced when compared to the Originally Approved Project. The same remediation activities would occur under the Revised Proposed Project, and as such, the same energy impacts would occur during remediation.

Because the 2017 MND for the Originally Approved Project demonstrated that no significant energy impacts would occur, and because the Revised Proposed Project would be smaller in scale than the Originally Approved Project,

no new or more severe energy impacts would occur under the Revised Proposed Project, and no new or different mitigation measures are required.

3.7 Geology and Soils

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
VII. GEOLOGY AND SOILS – Would the project:			
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:			
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<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 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 checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Originally Approved Project Impacts

As discussed in the 2017 Final MND for the Originally Approved Project, the Corporate Yard Facility project site lies within a seismically active region. As such there is the potential for impacts associated with rupture of a known fault and strong seismic ground shaking. However, with implementation of mitigation measure MM-GEO-1, as detailed below, potentially significant impacts would be reduced to a less than significant level. All other potential geology and soils impacts were determined to be less than significant.

- MM-GEO-1** Prior to issuance of grading, construction, or building permits, the City's Building Official and the City Engineer shall review and approve all geotechnical aspects of the project construction and grading plans to ensure compliance with the General Plan, California Building Code, and other local codes.

Revised Proposed Project Analysis

The Originally Approved Project involved site remediation and the buildout of a new approximately 35,650 square foot Corporate Yard Facility for the Department of Water Resources. Since approval of the project in 2017, changes to the project design have been made. The Revised Proposed Project now includes the same site remediation and the buildout of a new approximately 24,930-square-foot Corporate Yard Facility, including the reconstruction of the collapsed City Stables on the project site. Under the Revised Proposed Project, the new construction would be required, and as such, mitigation measure MM-GEO-1, would still be required prior to the issuance of grading, construction, and building permits.

The remainder of the Revised Proposed Project involves the construction and operation of a smaller scale project on the same site as the Originally Approved Project. As such, the Revised Proposed Project would result in the same less-than-significant geology and soils impacts. The Revised Proposed Project would not, therefore, result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects in the category geology and soils, and no new or different mitigation measures are required.

3.8 Greenhouse Gas Emissions

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
VIII. GREENHOUSE GAS EMISSIONS – Would the project:			
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<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 checked="" type="checkbox"/>

Originally Approved Project Impacts

As discussed in the 2017 Final MND for the Originally Approved Project, the Corporate Yard Facility project would result in less than significant greenhouse gas (GHG) emission impacts during remediation, construction, and operation. No mitigation measures were required for any of these phases of remediation, construction, and operation in order to reduce GHG emissions to a level below significance.

Revised Proposed Project Analysis

The Originally Approved Project involved site remediation and the buildout of a new approximately 35,650 square foot Corporate Yard Facility for the Department of Water Resources. Since approval of the project in 2017, changes to the project design have been made. The Revised Proposed Project now includes the same site remediation and the buildout of a new approximately 24,930-square-foot Corporate Yard Facility, including the reconstruction of the collapsed City Stables on the project site. Given that a smaller scale project would be constructed on the same site, GHG impacts for the Revised Proposed Project during construction and operation would be reduced when compared to the Originally Approved Project. The same remediation activities would occur under the Revised Proposed Project, and as such, the same GHG impacts would occur during remediation.

Because the 2017 MND for the Originally Approved Project demonstrated that no GHG emission thresholds would be exceeded, and because the Revised Proposed Project would be smaller in scale than the Originally Approved Project, no new or more severe GHG impacts would occur under the Revised Proposed Project, and no new or different mitigation measures are required.

3.9 Hazards and Hazardous Materials

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:			
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<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 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 checked="" type="checkbox"/>

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
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 checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<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 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 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 checked="" type="checkbox"/>

Originally Approved Project Impacts

As discussed in the 2017 Final MND for the Originally Approved Project, the Corporate Yard Facility project would result in less than significant hazards and hazardous materials impacts during remediation, construction, and operation. No mitigation measures were required for any of these phases of remediation, construction, and operation in order to reduce potential hazards and hazardous materials impacts to a level of less-than-significant.

Revised Proposed Project Analysis

The Originally Approved Project involved site remediation and the buildout of a new approximately 35,650 square foot Corporate Yard Facility for the Department of Water Resources. Since approval of the project in 2017, changes to the project design have been made. The Revised Proposed Project now includes the same site remediation and the buildout of a new approximately 24,930-square-foot Corporate Yard Facility, including the reconstruction of the collapsed City Stables on the project site. Given that a smaller scale project would be constructed on the same site, hazards and hazardous materials impacts for the Revised Proposed Project during construction and operation would be reduced when compared to the Originally Approved Project. The same remediation activities would occur under the Revised Proposed Project, and as such, the same hazards and hazardous materials impacts would occur during remediation.

Because the 2017 MND for the Originally Approved Project demonstrated that potential hazards and hazardous materials impacts would be less than significant, and because the Revised Proposed Project would be smaller in scale than the Originally Approved Project and constructed on the same site, no new or more severe hazards and hazardous materials impacts would occur under the Revised Proposed Project, and no new or different mitigation measures are required.

3.10 Hydrology and Water Quality

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
X. HYDROLOGY AND WATER QUALITY – Would the project:			
a) Violate any water quality standards or waste discharge requirements?	<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 checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<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 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 checked="" type="checkbox"/>
f) Otherwise substantially degrade water quality?	<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 checked="" type="checkbox"/>

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<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 checked="" type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Originally Approved Project Impacts

As discussed in the 2017 Final MND for the Originally Approved Project, the Corporate Yard Facility project would result in less than significant hydrology and water quality impacts during remediation, construction, and operation with implementation of standard regulatory requirements. No mitigation measures were required for any of these phases of remediation, construction, and operation in order to reduce potential hydrology and water quality impacts to a level of less-than-significant.

Revised Proposed Project Analysis

The Originally Approved Project involved site remediation and the buildout of a new approximately 35,650 square foot Corporate Yard Facility for the Department of Water Resources. Since approval of the project in 2017, changes to the project design have been made. The Revised Proposed Project now includes the same site remediation and the buildout of a new approximately 24,930-square-foot Corporate Yard Facility, including the reconstruction of the collapsed City Stables on the project site. Given that a smaller scale project would be constructed on the same site, hydrology and water quality impacts for the Revised Proposed Project during construction and operation would be reduced when compared to the Originally Approved Project. The same remediation activities would occur under the Revised Proposed Project, and as such, the same hydrology and water quality impacts would occur during remediation.

Because the 2017 MND for the Originally Approved Project demonstrated that potential hydrology and water quality impacts would be less than significant, and because the Revised Proposed Project would be smaller in scale than the Originally Approved Project and constructed on the same site, no new or more severe hydrology and water quality impacts would occur under the Revised Proposed Project, and no new or different mitigation measures are required.

3.11 Land Use and Planning

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
XI. LAND USE AND PLANNING – Would the project:			
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Originally Approved Project Impacts

As discussed in the 2017 Final MND for the Originally Approved Project, the Corporate Yard Facility project would result in no negative land use and planning impacts during remediation, construction, and operation. No mitigation measures were required for any of these phases of remediation, construction, and operation in order to reduce potential land use and planning impacts to a level of less-than-significant.

Revised Proposed Project Analysis

The Originally Approved Project involved site remediation and the buildout of a new approximately 35,650 square foot Corporate Yard Facility for the Department of Water Resources. Since approval of the project in 2017, changes to the project design have been made. The Revised Proposed Project now includes the same site remediation and the buildout of a new approximately 24,930-square-foot Corporate Yard Facility, including the reconstruction of the collapsed City Stables on the project site. Given that a smaller scale project would be constructed on the same site, no land use and planning impacts for the Revised Proposed Project would occur.

Because the 2017 MND for the Originally Approved Project demonstrated that no negative land use and planning impacts would occur, and because the Revised Proposed Project would be smaller in scale than the Originally Approved Project and constructed on the same site, no new or more severe land use and planning impacts would occur under the Revised Proposed Project, and no new or different mitigation measures are required.

3.12 Mineral Resources

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
XII. MINERAL RESOURCES – Would the project:			
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<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 checked="" type="checkbox"/>

Originally Approved Project Impacts

As discussed in the 2017 Final MND for the Originally Approved Project, the Corporate Yard Facility project would result in no mineral resources impacts during remediation, construction, and operation. No mitigation measures were required for any of these phases of remediation, construction, and operation in order to reduce potential mineral resources impacts to a level of less-than-significant.

Revised Proposed Project Analysis

The Originally Approved Project involved site remediation and the buildout of a new approximately 35,650 square foot Corporate Yard Facility for the Department of Water Resources. Since approval of the project in 2017, changes to the project design have been made. The Revised Proposed Project now includes the same site remediation and the buildout of a new approximately 24,930-square-foot Corporate Yard Facility, including the reconstruction of the collapsed City Stables on the project site. Given that a smaller scale project would be constructed on the same site, no mineral resources impacts for the Revised Proposed Project would occur.

Because the 2017 MND for the Originally Approved Project demonstrated that no mineral resources impacts would occur, and because the Revised Proposed Project would be smaller in scale than the Originally Approved Project and constructed on the same site, no new or more severe mineral resources impacts would occur under the Revised Proposed Project, and no new or different mitigation measures are required.

3.13 Noise

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
XIII. NOISE – Would the project result in:			
a) Generation of substantial temporary or permanent increase in ambient noise levels in vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Originally Approved Project Impacts

As discussed in the 2017 Final MND for the Originally Approved Project, the Corporate Yard Facility project would result in less than significant noise and vibration impacts during remediation and operation; however, during construction of the new Corporate Yard Facility, construction activities have the potential to temporarily result in significant noise and vibration impacts. With implementation of mitigation measures MM-NOI-1 and MM-NOI-2, as identified below, potentially significant noise impacts would be reduced to less than significant levels.

MM-NOI-1 Construction activities shall take place between the hours of 7:00 a.m. and 8:00 p.m. and not at all during other hours or on Sundays or federal holidays, in compliance with Section 18.305 of the City of Pomona Noise Ordinance. This condition shall be listed on the project's final design to the satisfaction of the City of Pomona Planning Division.

MM-NOI-2 The City shall adhere to the following measures as a condition of approving the grading permit:

- The project contractor shall, to the extent feasible, schedule construction activities to avoid the simultaneous operation of construction equipment, so as to minimize noise levels resulting from operating several pieces of equipment emitting high levels of noise.
- All construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers.

- Construction noise reduction methods, such as shutting off idling equipment, construction of a temporary noise barrier, maximizing the distance between construction equipment staging areas and adjacent residences, and use of electric air compressors and similar power tools, rather than diesel equipment, shall be used where feasible.
- During construction, stationary construction equipment shall be placed such that emitted noise is directed away from or shielded from sensitive receptors.
- Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding property owners to contact the job superintendent if necessary. In the event the City receives a complaint, appropriate corrective actions shall be implemented and a report of the action provided to the reporting party.

Revised Proposed Project Analysis

The Originally Approved Project involved site remediation and the buildout of a new approximately 35,650 square foot Corporate Yard Facility for the Department of Water Resources. Since approval of the project in 2017, changes to the project design have been made. The Revised Proposed Project now includes the same site remediation and the buildout of a new approximately 24,930-square-foot Corporate Yard Facility, including the reconstruction of the collapsed City Stables on the project site. Under the Revised Proposed Project, the new construction would be required, and as such, mitigation measures MM-NOI-1 and MM-NOI-2 would still be required in order to reduce temporarily significant noise and vibration impacts during construction.

The remainder of the Revised Proposed Project involves the construction and operation of a smaller scale project on the same site as the Originally Approved Project. As such, the Revised Proposed Project would result in the same less-than-significant noise and vibration impacts. The Revised Proposed Project would not, therefore, result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects in the category noise and vibration, and no new or different mitigation measures are required.

3.14 Population and Housing

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
XIV. POPULATION AND HOUSING – Would the project:			
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Originally Approved Project Impacts

As discussed in the 2017 Final MND for the Originally Approved Project, the Corporate Yard Facility project would result in no population and housing impacts during remediation, construction, and operation. No mitigation measures were required for any of these phases of remediation, construction, and operation in order to reduce potential population and housing impacts to a level of less-than-significant.

Revised Proposed Project Analysis

The Originally Approved Project involved site remediation and the buildout of a new approximately 35,650 square foot Corporate Yard Facility for the Department of Water Resources. Since approval of the project in 2017, changes to the project design have been made. The Revised Proposed Project now includes the same site remediation and the buildout of a new approximately 24,930-square-foot Corporate Yard Facility, including the reconstruction of the collapsed City Stables on the project site. Given that a smaller scale project would be constructed on the same site, no population and housing impacts for the Revised Proposed Project would occur.

Because the 2017 MND for the Originally Approved Project demonstrated that no population and housing impacts would occur, and because the Revised Proposed Project would be smaller in scale than the Originally Approved Project and constructed on the same site, no new or more severe population and housing impacts would occur under the Revised Proposed Project, and no new or different mitigation measures are required.

3.15 Public Services

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
XV. PUBLIC SERVICES			
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:			
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Originally Approved Project Impacts

As discussed in the 2017 Final MND for the Originally Approved Project, the Corporate Yard Facility project would result in no significant public services (i.e., impacts to fire and police protection services, schools, parks, libraries, and other public facilities) impacts during remediation, construction, and operation. No mitigation measures were required for any of these phases of remediation, construction, and operation in order to reduce potential public services impacts to a level of less-than-significant.

Revised Proposed Project Analysis

The Originally Approved Project involved site remediation and the buildout of a new approximately 35,650 square foot Corporate Yard Facility for the Department of Water Resources. Since approval of the project in 2017, changes to the project design have been made. The Revised Proposed Project now includes the same site remediation and the buildout of a new approximately 24,930-square-foot Corporate Yard Facility, including the reconstruction of the collapsed City Stables on the project site. Given that a smaller scale project would be constructed on the same site, no significant public services impacts for the Revised Proposed Project would occur.

Because the 2017 MND for the Originally Approved Project demonstrated that no significant public services impacts would occur, and because the Revised Proposed Project would be smaller in scale than the Originally Approved Project and constructed on the same site, no new or more severe public services impacts would occur under the Revised Proposed Project, and no new or different mitigation measures are required.

3.16 Recreation

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
XVI. RECREATION			
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<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 checked="" type="checkbox"/>

Originally Approved Project Impacts

As discussed in the 2017 Final MND for the Originally Approved Project, the Corporate Yard Facility project would result in no recreation impacts during remediation, construction, and operation. No mitigation measures were required for any of these phases of remediation, construction, and operation in order to reduce potential recreation impacts to a level of less-than-significant.

Revised Proposed Project Analysis

The Originally Approved Project involved site remediation and the buildout of a new approximately 35,650 square foot Corporate Yard Facility for the Department of Water Resources. Since approval of the project in 2017, changes to the project design have been made. The Revised Proposed Project now includes the same site remediation and the buildout of a new approximately 24,930-square-foot Corporate Yard Facility, including the reconstruction of the collapsed City Stables on the project site. Given that a smaller scale project would be constructed on the same site, no recreation impacts for the Revised Proposed Project would occur.

Because the 2017 MND for the Originally Approved Project demonstrated that no recreation impacts would occur, and because the Revised Proposed Project would be smaller in scale than the Originally Approved Project and constructed on the same site, no new or more severe recreation impacts would occur under the Revised Proposed Project, and no new or different mitigation measures are required.

3.17 Transportation/Traffic

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
XVII. TRANSPORTATION – Would the project:			
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Originally Approved Project Impacts

As discussed in the 2017 Final MND for the Originally Approved Project, the Corporate Yard Facility project would result in no significant transportation impacts during remediation, construction, and operation. No mitigation measures were required for any of these phases of remediation, construction, and operation in order to reduce potential transportation impacts to a level of less-than-significant.

Revised Proposed Project Analysis

The Originally Approved Project involved site remediation and the buildout of a new approximately 35,650 square foot Corporate Yard Facility for the Department of Water Resources. Since approval of the project in 2017, changes to the project design have been made. The Revised Proposed Project now includes the same site remediation and the buildout of a new approximately 24,930-square-foot Corporate Yard Facility, including the reconstruction of the collapsed City Stables on the project site. Given that a smaller scale project would be constructed on the same site, fewer operational vehicle trips would occur and therefore, as with the Originally Approved Project, no significant transportation impacts for the Revised Proposed Project would occur.

Since adoption of the 2017 MND, the State CEQA Guidelines have been modified to include vehicle miles traveled (VMT) analyses and thresholds. In response to the VMT analysis requirements, the City adopted their own VMT Screening Criteria Analysis in May 2021. Based on the VMT Screening Criteria Analysis, the following types of projects are screened out from requiring a comprehensive VMT analysis:

- 80,000 square-foot general office projects
- 150,000 square-foot light industrial projects
- 150,000 square-foot warehouse projects

Given that the Revised Proposed Project would result in the construction of a new approximately 24,930-square-foot Corporate Yard Facility, which is both light industrial and warehouse in nature, the Revised Proposed Project the preparation of a VMT analysis is not required.

Therefore, because the 2017 MND for the Originally Approved Project demonstrated that no significant transportation impacts would occur, because the Revised Proposed Project would involve the same remediation, less construction, and fewer operational vehicle trips given the reduced size of the project, and because the Revised Proposed Project is screened out from requiring a VMT analysis, no new or more severe transportation impacts would occur under the Revised Proposed Project, and no new or different mitigation measures are required.

3.18 Tribal Cultural Resources

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
XVIII. TRIBAL CULTURAL RESOURCES Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:			
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Originally Approved Project Impacts

As discussed in the 2017 Final MND for the Originally Approved Project, the Corporate Yard Facility project, through consultation with Gabrieleno Band of Mission Indians – Kizh Nation and the Gabrielino/Tongva Nation, the California Department of Substances Control determined that mitigation measures MM-TCR-1 through MM-TCR-4 were necessary

during remediation activities to reduce and avoid potential impacts to tribal cultural resources. Through implementation of these mitigation measures, impacts were determined to be less than significant.

- MM-TCR-1.** If any potential pre-historic or historic-era material are discovered during excavation activities, all work in that area will be halted or diverted until a qualified archaeologist can evaluate the nature and significance of the finds. If the materials are found to be Native American in origin, immediately contact any of the Tribal Contacts on the list provided by NAHC to alert them of the discovery. DTSC staff and property owner are also to be immediately notified and informed of this situation. After discussion with any of the Tribal Contacts and/or their respective Cultural Resource Managers and in collaboration with DTSC (including the Office of Environmental Justice and Tribal Affairs) and the property owner, implement any measures deemed necessary to record and/or protect the pre-historic or historic resources.
- MM-TCR-2.** The contractors performing the removal activities on the Site are to be alerted to be observant and aware that they may encounter potential Native American cultural or archaeological resources and/or human remains.
- MM-TCR-3.** In the event of an accidental discovery or recognition of any human remains during ground disturbing activities, excavation or disturbance of the site shall stop immediately and the County Coroner notified to determine its origin. The coroner will determine disposition within 48 hours. If the remains are Native American, the coroner will be responsible for contacting the NAHC within 24 hours. The NAHC will identify and notify the person(s) who might be the likely descendent (MLD) who will make recommendations for the appropriate and dignified treatment of the remains (Public Resources Code, Section 5097.98). The descendants shall complete their inspection and make recommendation or preferences for treatment within 48 hours of being granted access to the Site (CEQA Guidelines, CCR section 15064.5(e); HSC section 7050.5).
- MM-TCR-4.** In the event of an accidental discovery of potential cultural or archaeological resources, immediately suspend excavation activities in the immediate area and surrounding 50 feet until a qualified archaeologist can evaluate the nature and significance of the discovery. Immediately contact any of the Tribal Contacts on the list provided by NAHC to alert them of the discovery. DTSC staff and property owner are also to be immediately notified and informed of this situation. After discussion with any of the Tribal Contacts and/or their respective Cultural Resources Managers and in collaboration with DTSC (including the Office of Environmental Justice and Tribal Affairs) and the property owner, implement any measures deemed necessary to record and/or protect the cultural or archaeological resources.

Revised Proposed Project Analysis

The Originally Approved Project involved site remediation and the buildout of a new approximately 35,650 square foot Corporate Yard Facility for the Department of Water Resources. Since approval of the project in 2017, changes to the project design have been made. The Revised Proposed Project now includes the same site remediation and the buildout of a new approximately 24,930-square-foot Corporate Yard Facility, including the reconstruction of the collapsed City Stables on the project site.

In March 2021, the City issued a Notice of Preparation (NOP) indicating that an Environmental Impact Report (EIR) would be prepared for the Revised Proposed Project; however, since that time, the City has determined that the preparation of an EIR is not required. Upon initiating the EIR process, the City initiated tribal consultation pursuant to Assembly Bill (AB) 52. In response to the tribal consultation letters sent in early 2021, the Gabrieleno Band of Mission Indians - Kizh Nation requested consultation. In June 2021 and July 2021, the City underwent consultations with the Gabrieleno Band of Mission Indians - Kizh Nation, and based on the outcome of those consultations, it was determined that the following modifications to the mitigation measures focused on tribal cultural resources are appropriate.

MM-TCR-1 The project applicant/developer shall make known to the Gabrieleno Band of Mission Indians-Kizh Nation (Consulting Tribe on this project pursuant to Assembly Bill 52, from here on referred to as Tribe) the date and time of the tailgate cultural resource training (as provided for in MM-CUL-1) and will allow the Tribe to participate in the execution of the training. A senior member of the Tribe will inform and educate the project's construction and managerial crew and staff members (including any project subcontractors and consultants) about the TCR mitigation measures and compliance obligations.

MM-TCR-2 **Native American Monitoring.** Prior to the commencement of any ground disturbing activity at the Project site, the project applicant shall retain a Native American Monitor approved by the Tribe. A copy of the executed contract shall be submitted to the City of Pomona prior to the issuance of any permit necessary to commence a ground-disturbing activity. The project applicant/developer shall provide the Tribe with a minimum of 30 days advance written notice of the commencement of any project ground-disturbing activity so that the Tribe has sufficient time to secure and schedule a monitor for the project. The Tribal monitor will only be present on-site during the construction phases that involve initial ground-disturbing activities within native soils. Initial ground-disturbing activities is defined as movement of sediments from their place of last deposition prior to commencement of any component of the Project including remediation conducted by DTSC. As it pertains to Native American monitoring, this definition excludes movement of sediments after they have been initially disturbed or displaced by Project-related construction.

The Tribal Monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified.

The on-site tribal monitoring shall end when the qualified archaeologist has determined that all initial ground-disturbing activities within the Project areas described above (as defined above) are completed, or when the qualified archaeologist and Tribal Representatives/Monitor have indicated that all upcoming ground-disturbing activities at the Project Site have little to no potential for impacting known or unknown Tribal Cultural Resources (whichever defined threshold is met first).

Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find and a buffer of 50 feet will be established where no ground disturbing work will be allowed to occur until the find can be assessed and if required, treated according to CEQA requirements. All Tribal Cultural Resources unearthed by project activities shall be evaluated by the qualified archaeologist retained on-call and Tribal

monitor approved by the Consulting Tribe. If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes.

If human remains and/or grave goods are discovered or recognized at the Project Site, all ground disturbance shall immediately cease within 100 feet of the find and suspected extent of human remains as determined by the qualified archaeologist retained on-call and Tribal monitor approved by the Consulting Tribe. The county coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code Section 7050.5. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Work may continue on other parts of the Project Site (outside the 100-foot buffer) while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]).

The revised mitigation measures MM-TCR-1 and MM-TCR-2 are refinements to the content of the originally adopted MM-TCR-1 through MM-TCR-4 and do not represent new mitigation measures intended to reduce newly identified environmental impacts. These mitigation measures carry the same intent as those included in the 2017 Final MND and are not considerably different from those analyzed previously. As such, the situations under which a new environmental analysis would be required, as detailed within the State CEQA Guidelines Section 15162, are not triggered with the replacement of MM-TCR-1 through MM-TCR-4; these new mitigation measures are clarifications of and refinements to the original mitigation measures. No new or more severe tribal cultural resources impacts would occur under the Revised Proposed Project, and no new mitigation measures are required.

3.19 Utilities and Service Systems

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:			
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			
e) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Originally Approved Project Impacts

As discussed in the 2017 Final MND for the Originally Approved Project, the Corporate Yard Facility project would result in no significant utility and service system impacts during remediation, construction, and operation. No mitigation measures were required for any of these phases of remediation, construction, and operation in order to reduce potential utility and service system impacts to a level of less-than-significant.

Revised Proposed Project Analysis

The Originally Approved Project involved site remediation and the buildout of a new approximately 35,650 square foot Corporate Yard Facility for the Department of Water Resources. Since approval of the project in 2017, changes to the project design have been made. The Revised Proposed Project now includes the same site remediation and the buildout of a new approximately 24,930-square-foot Corporate Yard Facility, including the reconstruction of the collapsed City Stables on the project site. Given that a smaller scale project would be constructed on the same site, no significant utility and service system impacts for the Revised Proposed Project would occur.

Because the 2017 MND for the Originally Approved Project demonstrated that no significant utility and service system impacts would occur, and because the Revised Proposed Project would be smaller in scale than the Originally Approved Project and constructed on the same site, no new or more severe utility and service system impacts would occur under the Revised Proposed Project, and no new or different mitigation measures are required.

3.20 Wildfire

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
XIX. UTILITIES AND SERVICE SYSTEMS – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:			
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Originally Approved Project Impacts

The 2017 Final MND for the Originally Approved Project did not include a discussion of the potential for the project to result in wildfire impacts. Appendix G of the State CEQA Guidelines was updated in 2019, which was after the adoption of the 2017 Final MND, to add the thresholds above specifically related to Wildfire. The 2017 Final MND, however, did identify, within Section 3.8, Hazards and Hazardous Materials, that the Originally Approved Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires.

Revised Proposed Project Analysis

The Originally Approved Project involved site remediation and the buildout of a new approximately 35,650 square foot Corporate Yard Facility for the Department of Water Resources. Since approval of the project in 2017, changes to the project design have been made. The Revised Proposed Project now includes the same site remediation and the buildout of a new approximately 24,930-square-foot Corporate Yard Facility, including the reconstruction of the collapsed City Stables on the same project site. Given that the project site is not located within a high fire hazard severity zone or very high fire hazard severity zone, no wildfire impacts are anticipated to occur for the Revised Proposed Project.

3.21 Mandatory Findings of Significance

	New Potentially Significant Impact relative to Approved Project	New Mitigation is Required for Modified Project	Impact is Comparable to or Reduced relative to Approved Project
XXI. MANDATORY FINDINGS OF SIGNIFICANCE			
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 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 checked="" type="checkbox"/>

Originally Approved Project Impacts

The 2017 Final MND for the Originally Approved Project determined that with implementation of mitigation measures MM-BIO-1, MM-CUL-1, MM-GEO-1, and MM-TCR-1 through MM-TCR-4, all potentially significant impacts to the environment, habitat, fish, wildlife species, and human beings could be reduced to a less than significant level. For all other environmental topics evaluated (i.e., other than biological resources, cultural resources, geology and soils, and tribal cultural resources), impacts were determined to be either less than significant or no impacts would occur; as such, no further mitigation was required.

Revised Proposed Project Analysis

The Originally Approved Project involved site remediation and the buildout of a new approximately 35,650 square foot Corporate Yard Facility for the Department of Water Resources. Since approval of the project in 2017, changes to the project design have been made. The Revised Proposed Project now includes the same site remediation and the buildout of a new approximately 24,930-square-foot Corporate Yard Facility, including the reconstruction of the collapsed City Stables on the project site. Given that a smaller scale project would be constructed on the same site, no new or more severe impacts related to the Revised Proposed Project would occur. Because the 2017 MND for the Originally Approved Project demonstrated that no significant impacts would occur, and because the Revised

Proposed Project would be smaller in scale than the Originally Approved Project and constructed on the same site, no new or more severe impacts would occur under the Revised Proposed Project, and no new or different mitigation measures are required.

4 Preparers

Lead Agency

City of Pomona
148 North Huntington Street
Pomona, California 91768

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Vinny Tam, AICP, Senior Planner
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Nichole Horton, PE, Senior Water Resources Engineer

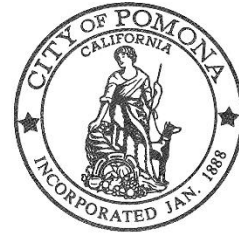
Dudek

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Nicole Cobleigh, Project Manager

THE CITY OF POMONA

Development Services Department



August 18, 2021

Mr. Chris Diggs, Director
Water Resources Department
City of Pomona
148 Huntington Street
Pomona, CA 91768

Subject: Review of City Stables Historical Eligibility

Dear Mr. Diggs,

I have reviewed the relevant information related to the historic status of the City Stables building. In addition I have been to the site and reviewed the HABS documentation for the building. I have determined that the City Stables building **IS NOT HISTORIC** under CEQA, regardless of its listing on the National Register of Historic Places, or it's designation as a local historic landmark.

The City Stables building is a unique building to Pomona, and the State of California, and is significant to the history of Pomona and the State of California. It was properly listed in the National Register of Historic Places and Designated a Local Historic Landmark.

However, since the time of designation, as an unreinforced building and due to a lack of proper maintenance, the building has lost much of its integrity. As noted in the 2003 National Register nomination the exterior walls has "several distinct shift cracks, due to creep, stress, and pressure from earthquakes". In addition the nomination noted that "severe wall damage is evident on the northwest side where many bricks have fallen or been removed".

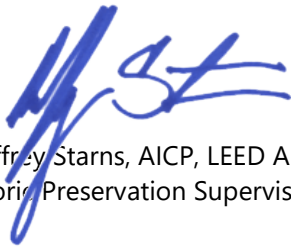
Since this property was evaluated the deterioration of the building has continued. The eastern half of the building has had a major failure, with the upper story of the east wall, and the eastern halves of the north and south walls, collapsing, and causing the east half of the roof to collapse. The collapse includes part of the cross gable roof. 50 percent of the roof and about 45 percent of the building walls have collapsed. The failure and collapse of the east wall has caused major damage to the building's integrity. The entire parapet and the majority of openings have been destroyed. In addition the eastern cupola is damaged and no longer sitting on the roof, but approximately halfway between the roof and second floor. In addition, the northwest corner has continued to deteriorate, causing openings that are beginning to loose brick and potentially impairing its integrity. The remaining walls are currently being supported with exterior posts to prevent any further failure.

Chris Diggs
City Stables Historical Eligibility
August 18, 2021

Due to the loss of the east gable end, and half of the building and roof, which contain most of the character-defining features of the building, the loss of so many of the character-defining features has impaired the building's architectural integrity and its ability to convey its significance, making it no longer eligible for designation as a local historic landmark or listing on the National Register of Historic Places. Since it is no longer eligible for listing in the National Register of Historic Places or designation as a local historic landmark, it is not historic under the CEQA guidelines. In addition, the proposed water project cannot have any adverse impact to an historic resource since there is no longer any historic resource on site.

If you have any questions, please contact me at (909) 620-2445 or email me at geoffrey_starns@ci.pomona.ca.us.

Sincerely,

A handwritten signature in blue ink, appearing to read 'G. Starns', is positioned above the printed name and title.

Geoffrey Starns, AICP, LEED AP BD+C
Historic Preservation Supervisor

cc: Anita D. Gutierrez, AICP, Development Services Director
Vinny Tam, Senior Planner