

## SAN BERNARDINO COUNTY INITIAL STUDY/SUBSEQUENT MITIGATED NEGATIVE DECLARATION ENVIRONMENTAL CHECKLIST FORM

This form and the descriptive information in the application package constitute the contents of Initial Study pursuant to County Guidelines under Ordinance 3040 and Section 15063 of the State CEQA Guidelines.

### PROJECT LABEL:

<b>APNs:</b>	0231-121-05	<b>USGS Quad:</b>	Guasti/Fontana
<b>Applicant:</b>	Applicant Name California Steel Industries, Inc. 1 California Steel Way Fontana, CA	<b>T, R, Section:</b>	T1S, R6W, Section 15 SE1/4
<b>Location</b>	San Bernardino Avenue and Cherry Avenue		
<b>Project No:</b>	PRAA-2023-00021	<b>Community Plan:</b>	Fontana
<b>Rep</b>	2 <sup>nd</sup> Supervisorial District	<b>LUZD:</b>	Regional Industrial
<b>Proposal:</b>	Installation of a new galvanizing line and a new push-pull pickle line at an existing steel manufacturing facility.	<b>Overlays:</b>	FP-2

### PROJECT CONTACT INFORMATION:

**Lead agency:** County of San Bernardino  
 Land Use Services Department  
 385 N. Arrowhead Avenue, 1<sup>st</sup> Floor  
 San Bernardino, CA 92415-0182

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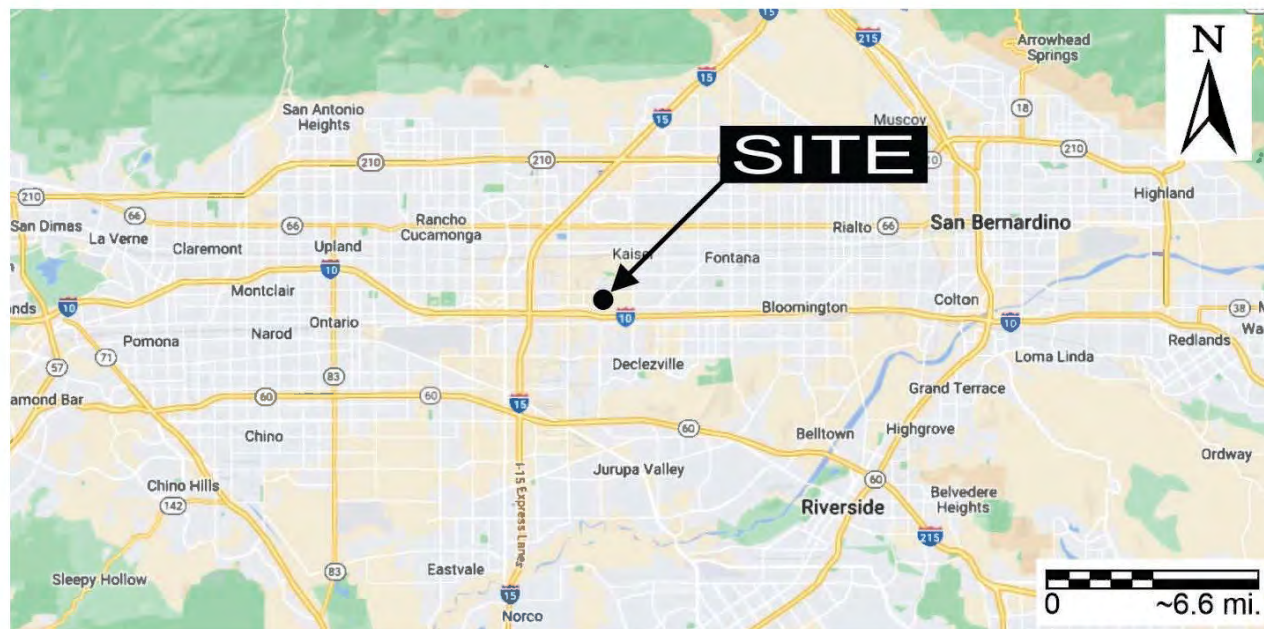
**Project Sponsor** California Steel Industries, Inc.  
 1 California Steel Way  
 Fontana, CA

### PROJECT DESCRIPTION:

#### **Summary**

The Project Site is located at 14000 San Bernardino Avenue, in unincorporated San Bernardino County, CA (see Figure 1, Regional Map). The Project Site is situated within the existing California Steel Industries, Inc. (CSI or Project Applicant) 430-acre facility. The Project Applicant proposes to construct a new galvanizing line (#3 CGL) and a push pull pickle line (PPPL) (collectively referred to as “the Project” or “Project modifications”). It is anticipated that the #3 CGL would be constructed first and the PPPL would be constructed after the #3 CGL is operational.

Figure 1. Regional Map



### **CSI Background**

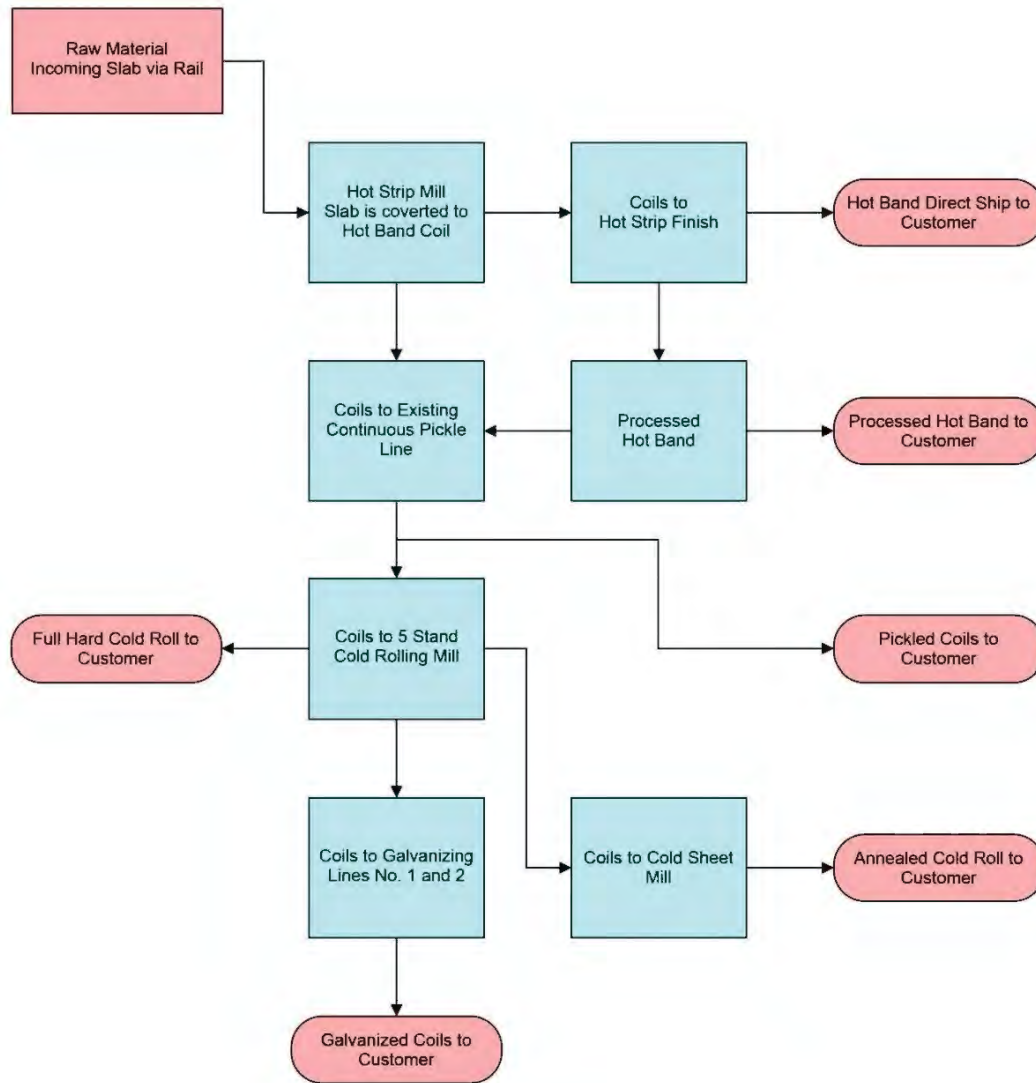
The existing CSI facility is located on a portion of the former Kaiser Steel facility that included a smelting mill and a steel mill between Etiwanda Avenue and Cherry Avenue and was constructed in 1942 to produce steel for World War II. Through the 1950s and 1960s, the plant was the leading producer of steel and steel product in southern California. In the 1970s, production began to wane and the Kaiser Steel plant closed in 1984. At that time, CSI acquired the former Kaiser reheat furnaces and the hot and cold rolling mills and has continued to produce steel pipe and steel coil products since then.

The majority of the facility production serves California customers, the pipe being an end-product and the steel coil, an intermediate product sold to manufacturers of other steel products. The CSI facility production capacity was analyzed under the California Environmental Quality Act (CEQA) in the Final Environmental Impact Report (EIR) for the CSI Reheat Furnace Replacement Project (SCH No. 2000071073) and approved for a maximum of 1.98 million tons per year. Prior to the COVID-19 pandemic, CSI produced approximately 1.4 million tons per year of steel products at this facility.

CSI manufactures hot rolled (pickled and oiled), galvanized and cold rolled sheet, and electric resistance welded pipe. CSI's customers manufacture a broad range of end-use products. CSI's steel is used in construction materials for the home and commercial building industries, such as steel framing studs, roofing, decking and metal lath. Other uses include water, gas and oil pipelines, automotive pans, tubing used in the construction and furniture industries, and heating and cooling parts. Much of CSI's products are also sold to service distribution centers throughout the Western and Midwestern United States, with some product also sold worldwide through the export market.

The flow of the steel from receipt of the steel slabs to the finished products for flat rolled products (i.e., excluding resistance welded pipe products) is shown in Figure 2.

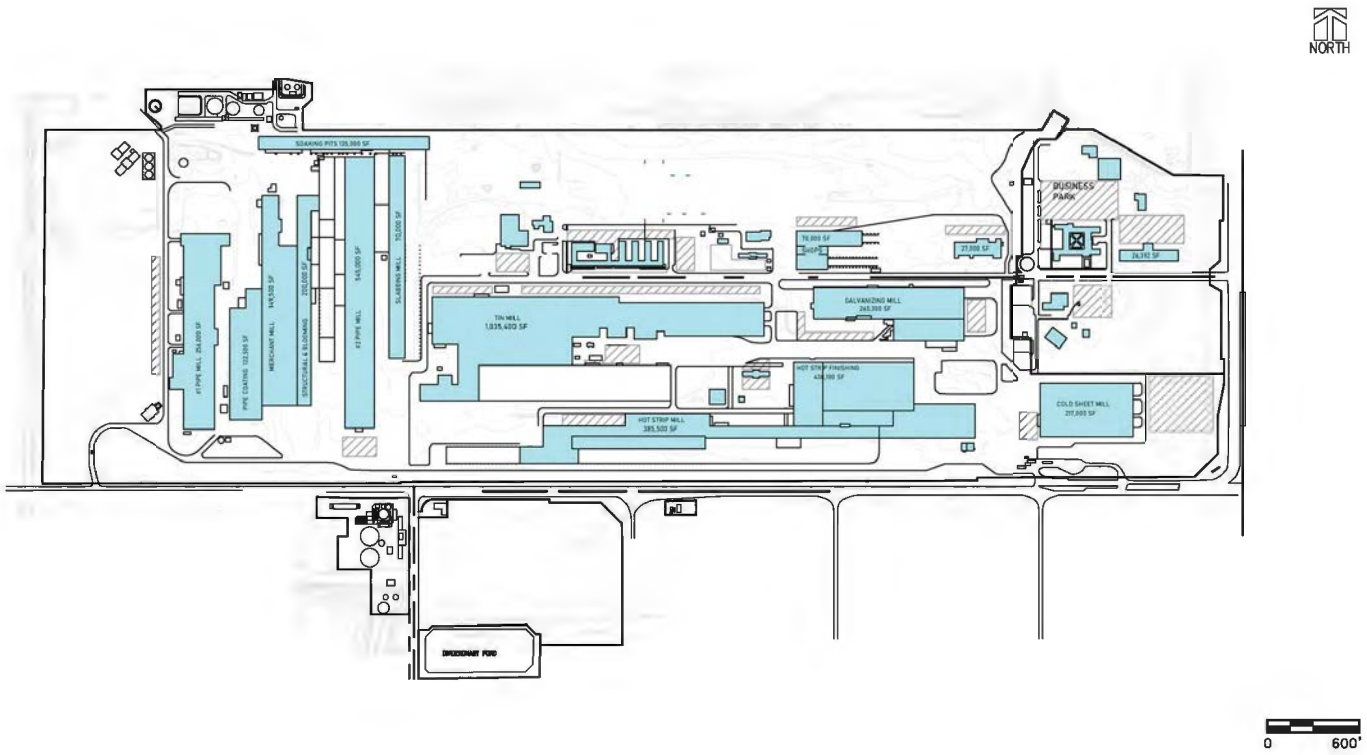
**Figure 2. CSI Product Flow Diagram – Flat Rolled Product**



**Existing Facility Overview**

The existing facility receives, by rail, semi-finished steel slabs, which are then processed sheet steel and further processed into either pipe or steel coil products. Two furnaces, Furnace No. 4 and Furnace No. 5 heat the steel slabs, which are then rolled into strips and rolled into coils. The coils may be sold directly to customers as hot rolled product or processed further on-site. Coils which are processed further are treated in a pickling line to remove surface scale and then cold rolled to final thickness. Cold rolled steel can either be sold directly to customers or further treated in one of two galvanizing lines, which add a galvanized layer to the surface of the steel to protect it from corrosion and extend its useful life. The existing processes are in operation today and will remain the same following completion of the project. Figure 3 shows the existing site layout.

Figure 3. Existing Site Layout



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### **Prior CEQA Review and the Applicability of a Subsequent CEQA Document**

CEQA requires preparation of an EIR for any project that a lead agency determines may have a significant impact on the environment. EIRs are informational documents “which will inform public agency decision-makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project” (Guidelines Sec. 15121).

An EIR prepared for an earlier project may also be used as part of an Initial Study to document a finding that a later project will not have a significant effect. In this situation, a Subsequent Negative Declaration will be prepared (Guidelines Sec. 15153(c)). Once a project has undergone CEQA review, no further environmental review may be required unless substantial changes are proposed in the project that will require major revisions of the prior CEQA document; or substantial changes occur in circumstances under which the project is being undertaken that will require major revisions in prior CEQA document; or new information of substantial importance to the project that was not known and could not have been known when the EIR was certified as complete becomes available. (Pub. Res. Code. Sec. 21166; Guidelines Sec. 15162).

When a project has already undergone CEQA review and changes in the project necessitate development of a subsequent CEQA document, the later CEQA analysis should be limited to effects that were not examined in the prior CEQA analysis (Guidelines Sec. 15152(d)).

“The purpose behind the requirement of a subsequent or supplemental EIR or negative declaration is to explore environmental impacts not considered in the original environmental document. ... The event of a change in a project is not an occasion to revisit environmental concerns laid to rest in the original analysis. Only changed circumstances ... are at issue. (San Mateo Gardens (2016) 1 Cal.5th 937, 949-950.) The term negative declaration refers to the form of the environmental document, which can be either a unmitigated and mitigated Negative Declaration.

In February, 2002, the County Board of Supervisors approved the Final EIR for the CSI Reheat Furnace Replacement (RFR) Project. Prior to approval of the RFR Project, the site had four slab reheat furnaces (Nos. 1, 2, 3, and 4). The Furnaces Nos. 1 and 3 had been decommissioned; Furnace No. 2 and Furnace No. 4 were in service. The RFR Project replaced the Furnace No. 2 with a new Furnace No. 5, so that the CSI Facility operates with only two slab reheat furnaces (No. 4 and No. 5). The project modernized the CSI facility with the installation of the Furnace No. 5, which increased the production at the plant by 19 percent (from 1.664 million tons per year to 1.98 million tons per year). Furnace No. 5 is capable of producing the same quality product as Furnace No. 4, which eliminated product quality issues from using Furnace No. 2. The existing Furnace No. 5 is equipped with selective catalytic reduction (SCR) emissions controls and the existing Furnace No. 4 has a Permit to Construct an SCR, which are the Best Available Control Technology (BACT) for reducing nitrogen oxide (NOx) emissions from the natural gas combustion in the furnace exhaust.

Table 3-9 of the RFR Project 2001 Draft EIR (incorporated into the Final EIR by reference) presented the 1998 and approved production rates for the facility (included here as Table 1).

**Table 1. Production Capacity at CSI: 1998 and with the RFR Project**

Product	Tons per Year		Percent Change
	1998	w/ RFR Project	
Hot Rolled [Pickled and Oiled]	774,000	900,000	16.3
Cold Rolled	298,700	360,000	20.5
Galvanized	480,600	600,000	24.8
Electric Resistance Welded (ERW) Pipe	111,000	120,000	8.1
<b>Total Production</b>	<b>1,664,300</b>	<b>1,980,000</b>	<b>19.0</b>

Source: 2001 CSI Draft EIR, Table 3-1, page 3-9.

The RFR Project Draft EIR presented activity levels for transportation of activities for rail transport in Table 3-2 (included here as Table 2) for the then current activities and the approved increases. Truck transport was described in the text below Table 3-2, which has been incorporated into Table 2.

**Table 2. Transportation Activity Levels at CSI: 1998 and with the RFR Project**

Activity	Average Trains per Month	Average CSI-Related Railcars	
		Per Train	Per Month
Slab Delivery (inbound), current	25	78.6	1,966
Project-Related Slab Delivery	9	41.7	376
<b>Inbound, with Project</b>	<b>34</b>	<b>68.9</b>	<b>2,342</b>
Product Transport (outbound), current	25	16.3	408
Project-Related Product Transport (outbound)	9	10.0	90
<b>Outbound, with Project</b>	<b>34</b>	<b>14.6</b>	<b>498</b>
Activity	Average Daily One-Way Vehicle Trips	Automobiles	Trucks
Total Vehicles, current	3,176	2,636	540
Project-Related	204	165	39
<b>Total Vehicles, with Project</b>	<b>3,380</b>	<b>2,801</b>	<b>579</b>

Source: 2001 CSI Draft EIR, Table 3-2 and text from, page 3-11.

The RFR Project assumed that the facility would require 1,400 employees (the number of employees is half the automobile daily one-way trips presented in Table 2 ( $2,801/2 = 1,400$ ) but this level of employment was not required. Rather, the CSI Facility currently operates with 900-950 employees. The current Project modifications would result in an increase of 50-100 employees.

The Project modifications provide flexibility in the mix of products from the facility without increasing the total production analyzed in the RFR Project EIR. The objectives of the Project modifications are to:

1. Increase the facility's ability to produce galvanized (zinc-coated) and aluminum zinc alloy-coated sheet products from 600,000 tons/year to 1,100,000 tons per year while maintaining overall steel production within previously approved levels.
2. Replace American production capacity that will be lost due to the pending shutdown of the USS-UPI steel facility in Pittsburg, California at the end of 2023.
3. Allow CSI to optimize its product mix to meet shifting market demand for galvanized and aluminum zinc alloy-coated sheet products.

Much like the RFR Project, which adjusted the production capacity of the facility to meet market demands, the Project modifications provide the flexibility to meet the changing market demands for various products. However, the Project modifications do not affect the overall facility production rate. Therefore, the use of Subsequent Mitigated Negative Declaration is the appropriate document for the Project modifications.

### ***Surrounding Land Uses and Setting***

CSI is located on a 430-acre parcel in the unincorporated Fontana area of San Bernardino County, at the northwest corner of San Bernardino and Cherry Avenues, between the cities of Fontana and Rancho Cucamonga (Project Site). The Project Site is located one mile north of Interstate 10 on the site of the former Kaiser Steel Mill. Figure 4 shows an aerial photograph of the general location of the Project Site. Figure 5 shows an aerial photograph of the Project Site.

**Figure 4. General Location of Project Site**





Figure 5. Project Site



The Project Site has a corporate driveway and entrance on the west side of Cherry Avenue and its major commercial truck entrance is on the north side of San Bernardino Avenue. Rail spurs enter the Project Site at the northeast and southwest corners. The area surrounding the Project Site is primarily industrial, with some commercial and a few residences located east of Cherry Avenue and south of San Bernardino Avenue. The land use plan<sup>1</sup> for the area is industrial and the zoning is IR (Regional Industrial)<sup>2</sup>.

The old Kaiser Steel plant originally covered 900 acres, of which the Project Site consists of the southeastern 430 acres. Most of the remaining acreage of the former plant is now the Southern California Speedway, located immediately north of the Project Site. Currently when no races are scheduled, the track is used for automotive testing and the filming of movies and commercials. In 2022, the County approved the Speedway Commerce Center II Specific Plan Project which would modify the 522- acre existing Auto Club Speedway, immediately north of the Project Site, into a smaller race track, with high-cube logistics and e-commerce development and ancillary commercial uses (see Checklist Section 11 for additional details). To the southwest of the Project Site, are the slag piles from the old Kaiser Steel blast furnaces. Some portions of the slag piles are being recycled for use as parking lot surfaces; other portions are contaminated and are undergoing cleanup. To the east of the Project Site is a mix of vehicle dismantling and salvage yards, recycling and small manufacturing businesses and some legal, non-conforming residences. South of the Project Site are light industrial and commercial uses, with some legal

<sup>1</sup> San Bernardino CountyWide Plan, Policy Plan, Draft Policy Map LU-1A Land Use Map – Valley Region, adopted in 2020, <https://countywideplan.com/wp-content/uploads/sites/68/2021/02/LU-2-General-Boundaries-06232023.pdf> accessed August 2023. [Note: The Policy Plan serves as the County's General Plan.

<sup>2</sup> San Bernardino County, Land Use Services, Zoning Maps Interactive Online Zoning Maps County Map Viewer, <https://sbcounty.maps.arcgis.com/apps/MapSeries/index.html?appid=f5a50c44766b4c36a3ae014497aa430d> for address California Steel Street, Fontana, CA, accessed August 2023.

non-conforming residences. Table 3 summarized the surrounding land uses adjacent to the Project Site.

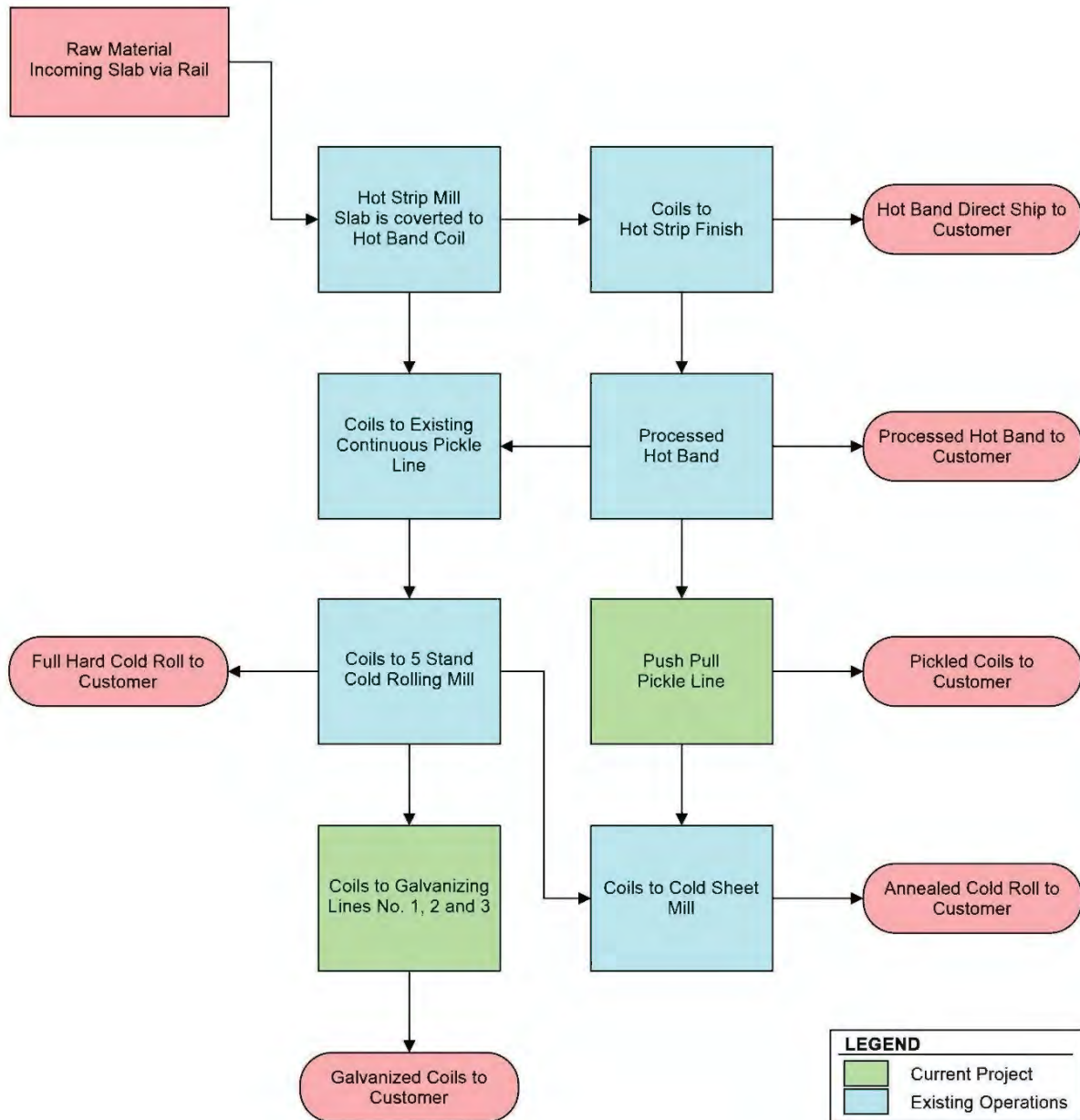
**Table 3. Existing Land Use Surrounding the Project Site**

<b>Existing Land Use and Land Use Zoning Districts</b>			
<b>Location</b>	<b>Existing Land Use</b>	<b>CWP Land Use Category</b>	<b>Zoning District</b>
<b>Project Site</b>	Steel Mill	Regional Industrial	IR – Regional Industrial
North	California Speedway	Special Development	SD-COM - Special Development Commercial
South	Southwest are slag piles from the old Kaiser Steel Blast Furnaces South are Light Industrial and Commercial Uses with some Legal non-conforming Residences	Regional Industrial	IR- Regional Industrial  IR – Regional Industrial
East	Vehicle Dismantling and Salvage Yards, Recycling and Small Manufacturing Businesses with some Legal, Non-conforming Residences	Special Development	SD-COM - Special Development Commercial
West	Industrial and Commercial Uses	Special Development and Regional Industrial	KC/SP-WE-Rail

**Detailed Project Description**

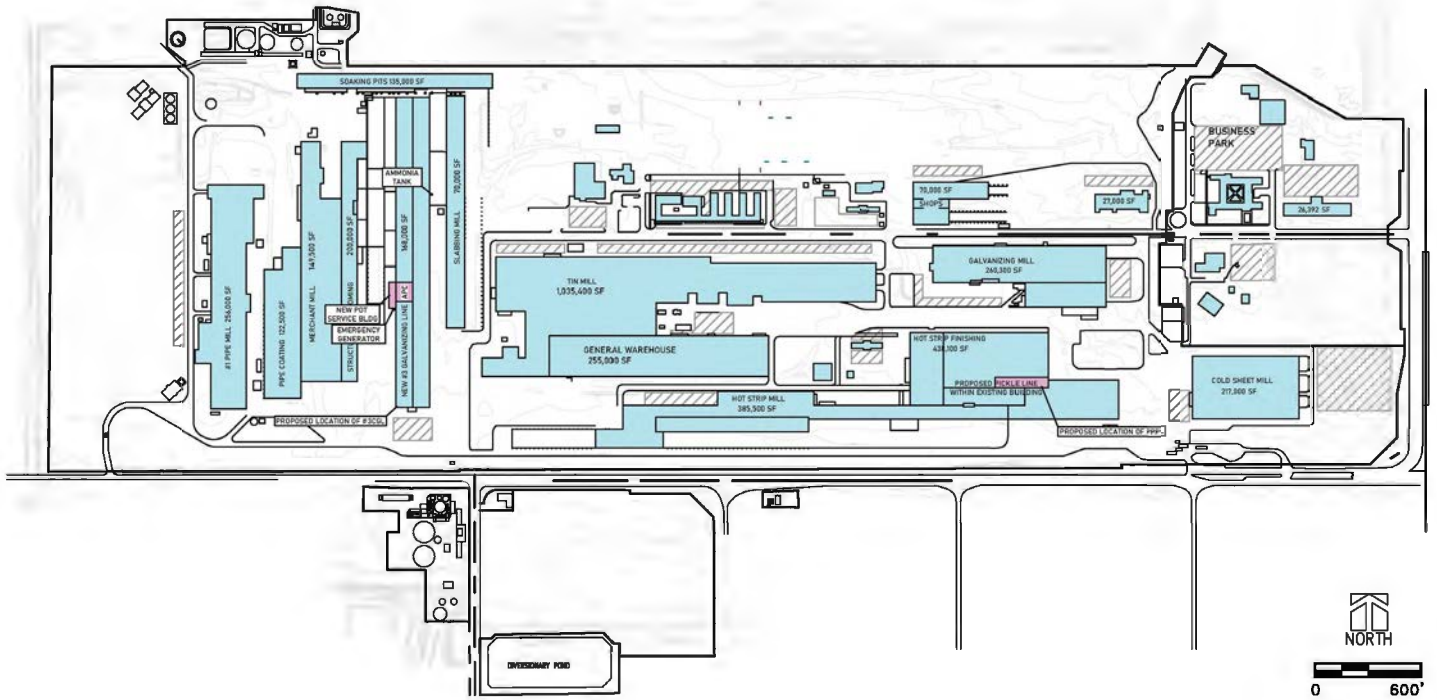
Currently the quantity of each product is based on market demand. The #3 CGL and new PPPL will allow greater flexibility in the quantities of the various types of finished products to shift to meet market demand. Figure 6 shows the modifications to the existing product flow for flat rolled products. The resistance welded pipe products will remain unchanged by the Project and the total product output from the facility will remain the same as previously approved (i.e. 1.98 million tons of product).

**Figure 6. CSI Product Flow Diagram – Flat Rolled Product as Modified by the Project**



The existing site configuration is shown in Figure 7 with the locations of the #3 CGL and PPPL highlighted in purple. The new emergency generator will be located south of the #3 CGL.

Figure 7. Existing Site Layout Showing the New #3 CGL, PPPL, and Emergency Generator



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The #3 CGL component of the Project would install the following equipment:

- an entry section consisting of two coil payoff reels feeding an electric lap seam welder,
- a cleaning section consisting of physical cleaning with brush scrubbers followed by a series of up to six 3,500- to 6,500-gallon tanks and rinse baths that utilize caustic cleaner to remove any impurities from the surface of the steel strip. This section will be connected to a fume exhaust system followed by a wet packed-bed scrubber,
- new combustion units including two heaters with a combined heat input of approximately 83 million British thermal units per hour (mmBtu/hr) and emissions control equipment to reduce carbon monoxide (CO) emissions using a 6 mmBtu/hr thermal afterburner and nitrogen oxide emissions using an SCR with a new 10,500-gallon aqueous ammonia storage tank,
- an induction heated refractory-lined coating pot that will hold approximately 225 metric tons of molten zinc (99% zinc and 1% aluminum) that the steel strip passes through,
- a chemical treating section consisting of two roll transfer coaters for applying different types of oxidation preventative or preparation coatings. One coater for trivalent chrome or hexavalent chrome application, equipped with a negative-pressure hood and vented to a high efficiency particulate air (HEPA) filter, and one water-based acrylic coating applicator to the strip that will be connected to a thermal oxidizer to eliminate Volatile Organic Compounds. This option is used if the coated coil will be painted by the customer on a process line or for some roof decking products, and
- an exit reel to coil the finished product.

The new galvanizing line will be constructed within the existing Plate Mill building that most recently contained the No.2 Pipe Mill. The equipment associated with the Pipe Mill will be removed and the existing building will be used to house the #3 CGL. The roof line of the Plate Mill building will remain the same (approximately 60 feet high) for most of the building, but will be modified to a maximum height of 185 feet at the cooling tower section of the #3 CGL. In addition, at the west side of the Plate Mill building and extension will be built approximately 60 feet wide by 150 feet long in the vicinity of the cooling tower (an addition of approximately 9,000 square feet) to accommodate the new equipment.

A new 900 brake horsepower emergency generator will be installed adjacent to the west side of the #3 CGL building.

The PPL component of the Project would install the following equipment:

- five 25,000-gallon storage tanks for fresh and spent solutions,
- fifteen 750- to 7,000-gallon process tanks,
- a 12,000-gallon rinse tank,
- a packed-bed scrubber to control acid emissions; and
- an exit reel to coil the finished product.

### **Process Description**

The #3 CGL is designed similarly to the #1 and #2 CGLs. The process begins with coils being delivered to the line from the 5 Stand Cold Rolling Mill either by an automated coil handling system or electric fork truck. #3 CGL will be a continuous process where coils are welded head to tail so the line is not required to stop.

Upon entering #3 CGL, the rolled steel strip will move through a cleaning section that consists of physical cleaning with brush scrubbers followed by a series of tanks and rinse baths that utilize caustic cleaner to remove any impurities from the surface of the steel strip. This section will be connected to a fume exhaust system followed by a wet packed-bed scrubber. Alkali wastewater from this section will be piped to the existing Wastewater Treatment Plant on-site.

Next the strip enters the furnace. The furnace exhaust system will utilize a recuperator to preheat the combustion air for fuel efficiency, as well as a heat recovery steam generator to provide the hot water for the cleaning section.

The strip leaves the furnace through a 'snout' into the Coating Pot. The strip leaves the snout below the level of the molten zinc or aluminum-zinc coating and wraps around a turn roll then leaves the Coating Pot vertically through a set of air knives that use high pressure air to control the coating weight. This line will be equipped with two coating pots to allow the change-over from conventional galvanized / galvanized product – where the coating is > 99% zinc, to a or aluminum zinc alloy coating type coating, which is 55% aluminum, 43.4% zinc, and 1.6% silicon. Next the strip may proceed through an electrically heated furnace and into an air cooling tower. Once the coating has air cooled in the tower, the strip runs through a process section to flatten and condition the surface of the strip.

The next process is the chemical treatment section, where one of three types of oxidation preventive or paint preparation coatings are applied. The first two treatments are applied with a flood and squeegee roll coater. These two treatments utilize Hexavalent or Trivalent Chrome for the prevention of surface oxidation. The Hexavalent Chrome applicator is contained in a hood with negative pressure and is vented through a High Efficiency Particulate Air filter to reduce emissions to permitted levels. The third option of coating is a two-roll roll coater that applies a water-based acrylic coating to the strip. Exhaust from the two-roll coat operations will be captured and entrained Volatile Organic Compounds will be controlled. This option is used if the coated coil will be painted by the customer on a process line or for some roof decking products.

After this section, the strip moves through an electrically heated dryer to dry the coating. Finally, the strip is coiled and cut from the line, and then is packaged and is ready to ship.

The PPPL will receive coils from the Hot Strip Mill and will be chemically processed in a hydrochloric acid bath to remove scale. The cleaned steel is preserved by oiling, and the resultant product is called "pickled and oiled" (P&O). P&O is sold as input to others' manufacturing processes, or is further processed at CSI.

### **Construction Schedule**

No new buildings will be constructed as part of the proposed project. The modifications to the existing Plate Mill building would occur over approximately six months. Installation of the new equipment within the Plate Mill building is expected to take place over approximately a 10 to 12 month period.

The PPPL will be housed within the existing Hot Strip Finishing building. As such, no new buildings will be constructed for the new PPPL equipment. Equipment installation is expected to take 9 to 12 months.

**Project Approvals**

Agencies whose approval is required (e.g., permits, financial approval, or participation agreement), and their permits/approvals are listed in Table 4.

**Table 4. Required Permits/Approvals**

Agency	Permit or Approval
County of San Bernardino	Certification of Subsequent Mitigated Negative Declaration Project Approval Revision to a Previously Approved Conditional Use Permit Demolition Permit Grading Permit Update Existing Risk Management Plan Update Hazardous Materials Business Plan
South Coast Air Quality Management District	Permits to Construct/Operate

**ADDITIONAL APPROVAL REQUIRED BY OTHER PUBLIC AGENCIES**

Federal: None.

State of California: California EPA

County of San Bernardino: Land Use Services Department-Building and Safety, Public Health-Environmental Health Services, Special Districts, Fire Department Hazardous Materials, and Public Works.

City of Fontana: Sphere of Influence

Regional: South Coast Air Quality Management District.

Local: None

**CONSULTATION WITH CALIFORNIA NATIVE AMERICAN TRIBES**

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

The County Planning Department sent notices out to all tribes that have requested notification under the requirements of Public Resources Code §21080.3.1 regarding the potential project modifications to the CSI Facility. One tribe, Yuhaaviatam of San Manuel Nation (formerly known as the San Manuel Band of Mission Indians) responded indicating that the project area is within Serrano ancestral territory and is of interest to the Tribe. However, due to the nature and location of the project and current knowledge of the area, the Tribe does not have any concerns with the project’s implementation at this time. No other tribes have commented at this time.



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 21083.3.2.) 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.

## **EVALUATION FORMAT**

This Initial Study is prepared in compliance with the California Environmental Quality Act (CEQA) pursuant to Public Resources Code Section 21000, et seq. and the State CEQA Guidelines (California Code of Regulations Section 15000, et seq.). Specifically, the preparation of an Initial Study is guided by Section 15063 of the State CEQA Guidelines. This format of the study is presented as follows. The project is evaluated based on its effect on 20 major categories of environmental factors. Each factor is reviewed by responding to a series of questions regarding the impact of the project on each element of the overall factor. The Initial Study checklist provides a formatted analysis that provides a determination of the effect of the project on the factor and its elements. The effect of the project is categorized into one of the following four categories of possible determinations:

Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant	No Impact
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Substantiation is then provided to justify each determination. One of the four following conclusions is then provided as a summary of the analysis for each of the major environmental factors.

1. **No Impact:** No impacts are identified or anticipated, and no mitigation measures are required.
2. **Less than Significant Impact:** No significant adverse impacts are identified or anticipated, and no mitigation measures are required.
3. **Less than Significant Impact with Mitigation Incorporated:** Possible significant adverse impacts have been identified or anticipated and the following mitigation measures are required as a condition of project approval to reduce these impacts to a level below significant. The required mitigation measures are: (List of mitigation measures)
4. **Potentially Significant Impact:** Significant adverse impacts have been identified or anticipated. An Environmental Impact Report (EIR) is required to evaluate these impacts, which are (List of the impacts requiring analysis within the EIR).

At the end of the analysis the required mitigation measures are restated and categorized as being either self- monitoring or as requiring a Mitigation Monitoring and Reporting Program.

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

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

**DETERMINATION:** (To be completed by the Lead Agency)

On the basis of this initial evaluation, the following finding is made:

<input checked="" type="checkbox"/>	The proposed project <b>COULD NOT</b> have a significant effect on the environment, and a Subsequent <b>NEGATIVE DECLARATION</b> shall be prepared.
<input type="checkbox"/>	Although the proposed project could have a significant effect on the environment, there shall 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 <b>MITIGATED NEGATIVE DECLARATION</b> shall be prepared.
<input type="checkbox"/>	The proposed project <b>MAY</b> have a significant effect on the environment, and an <b>ENVIRONMENTAL IMPACT REPORT</b> is required.
<input type="checkbox"/>	The proposed project <b>MAY</b> 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 <b>ENVIRONMENTAL IMPACT REPORT</b> is required, but it must analyze only the effects that remain to be addressed.
<input type="checkbox"/>	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 EIR or <b>NEGATIVE DECLARATION</b> pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or <b>NEGATIVE DECLARATION</b> , including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

  
 Signature: (prepared by Elena Barragan, Senior Planner)

01/06/2025  
 Date

  
 Signature: (Paul Toomey, Planning Manager)

01/06/2025  
 Date

Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
<b>I. AESTHETICS</b> – Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a 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 type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare, which will adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**SUBSTANTIATION:** (Check  if project is located within the view-shed of any Scenic Route listed in the General Plan):  
**San Bernardino General Plan, 2020; Submitted Project Materials**

**1.1 Environmental Setting**

The existing CSI facility is located within a heavy industrial portion of unincorporated San Bernardino County, between the cities of Fontana and Rancho Cucamonga, within the City of Fontana sphere of influence. The site is zoned IR or Regional Industrial. The area surrounding the Project Site is primarily industrial, with some commercial and a few residences. The closest residences are approximately 1,600 feet from the CSI property line.

The Project Site consists of industrial buildings that contain the operations of the existing steel mill. Furnaces, stacks, and emission control devices are also visible to the surrounding community. The most visible elements of the Project Site are the stacks associated with the furnaces that are approximately 150 feet in height. Rail facilities associated with the CSI operations are visible from areas south of the facility, primarily located along San Bernardino Avenue.

The old Kaiser Steel plant originally covered 900 acres of which the Project Site consists of the southeastern 450 acres. Most of the remaining acreage of the former Kaiser plant is now the Southern California Speedway, a major auto racing venue, which is proposed to be redeveloped for mixed uses, including high-cube logistics and e-commerce development, commercial development, a smaller motorsports race track and amenities, and a multi-use trail.

To the southwest of the Project Site are the slag piles from the old Kaiser Steel blast furnaces. The land to the east is a mix of vehicle dismantling and salvage yards, recycling and small manufacturing businesses and some legal, non-conforming residences. The land due south is largely light industrial and commercial, with some legal non-conforming residences.

## 1.2 Previous Environmental Review

The Project Site was not identified by the County as being located within the viewshed of any Scenic Route. The RFR Project was located within a highly industrial visual setting and the previous project would not degrade the existing visual character of the area. Therefore, the RFR Project was determined to have no impact on aesthetic resources.<sup>3</sup>

The construction of the RFR Project occurred during daylight hours so there was no short-term increase in lighting. The RFR Project was located within an area that is fenced and lighted to provide security and worker safety. As part of the RFR Project, the new building was lighted in keeping with the safety and security lighting. The lighting was partially visible to short- and mid-range viewers, to the extent existing intervening screening allows. None of the RFR Project-related lighting was found to result in substantial light or glare that would adversely affect views. Therefore, the long-term impact of new lighting was determined to be less than significant.

## 1.3 Impacts Associated with Project Modifications

**1. a). Have a substantial adverse effect on a scenic vista?** No Impact.

**1. b). Substantially damage to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings along a scenic highway?** No Impact. The Project Site is not identified by the County as located within the view shed of any Scenic Route. Further, no scenic highways as designated by Caltrans are located in the area. The closest scenic highways are Highway 38 (approximately 18 miles east of the Project Site) and Highway 330 (approximately 18 miles northeast of the Project Site) (Caltrans, 2023). Because of the distance and intervening topography and development, the Project modifications will not be visible to these highways and have no impact on scenic vistas or resources.

**1. 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 a 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.** No Impact. The #3 CGL will be built within the existing Plate Mill building, and the new PPPL will be located inside an existing building. Therefore, the equipment will not be visible outside of the existing buildings. The exception to this is that height of the Plate Mill

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<sup>3</sup> See SB County, 2001, Draft EIR, Appendix A, pages 16-17.

building for the #3 CGL will be a maximum height of 185 feet at the air cooling tower section of the #3 CGL. This will increase the height of the building which would be visible from San Bernardino Avenue and some of the industrial areas on the south side of the CSI facility. These modifications would not introduce significant aesthetic impacts as no scenic views would be impacted and changes to views would be limited to industrial areas. Further, the project modifications would not conflict with any zoning regulations, as the site is zoned for industrial uses without limitations of height.

The County General Plan includes the following policies for scenic resources that highlight the natural environment and reinforce the identity of local communities and the County.

Policy NR-4.1: Preservation of scenic resources. We consider the location and scale of development to preserve regionally significant scenic vistas and natural features, including prominent hillsides, ridgelines, dominant landforms and reservoirs.

Policy NR-4.2: Coordination with agencies. We coordinate with adjacent federal, state, local, and tribal agencies to protect scenic resources that extend beyond the County's land use authority and are important to countywide residents, businesses, and tourists.

Policy NR-4.3: Off-site signage. We prohibit new signage and encourage the removal of existing off-site signage along or within view of County Scenic Routes and State Scenic Highways.

The Project modifications do not conflict with these scenic resources policies as there are no scenic resources in the vicinity of the CSI Site.

**d). Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?** No Impact. The Project modifications would occur within existing buildings. The CSI site is currently lit both indoors and outdoors for worker safety and to provide security. Outdoor lighting is pointed towards the ground to illuminate work areas. No new outdoor lighting is expected to be required. Therefore, the Project modifications are not expected to increase the amount of outdoor lighting. An aircraft warning light may be required on the cooling tower, however, these lights are not bright and do not generate light off-site. Therefore, no impacts associated with light and glare are expected.

#### **1.4 Conclusion**

Based on the above, the Project modifications would not result in any significant change in the aesthetics or light and glare impacts of the Project Site as all of the major equipment associated with the modification would occur within buildings and not be visible to the surrounding area. Since no potentially significant adverse impacts to aesthetic resources were identified, no mitigation measures or further evaluation is required.

Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
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**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 Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

- |    |   |                          |                          |                          |                                     |
|----|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) | Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) | Conflict with existing zoning for agricultural use, or a Williamson Act contract?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) | Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) | Result in the loss of forest land or conversion of forest land to non-forest use?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) | Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |

**SUBSTANTIATION:** (Check  if project is located in the Important Farmlands Overlay):

**San Bernardino County General Plan, 2020; California Department of Conservation Farmland Mapping and Monitoring Program; Submitted Project Materials**

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## 2.1 Environmental Setting

The Project modifications are located within the existing CSI facility, which is located within a heavy industrial area of unincorporated San Bernardino County. The area surrounding the Project Site is primarily industrial. No agriculture or forestry resources are located within the vicinity of the Project Site.

## 2.2 Previous Environmental Review

The Project Site is not located in a County-identified Important Farmland Overlay, and therefore does not contain soils considered to be farmland that is Prime, Unique, or of Statewide or Local Importance. Project Site native soils have been either previously removed, or are overlain with fill material and asphalt or slag, and in its existing state, the site is not suitable for agricultural purposes. The highly industrialized CSI property is not proximate to properties zoned for agricultural use or subject to a Williamson Act contract.

a) and b). No agricultural lands could be directly converted to non-agricultural use or otherwise affected by the RFR Project, and no impact would occur.

c). The RFR Project was not expected to result in changes to the environment that could result in indirect conversion of agricultural land to other uses, and no impact would occur. Therefore, it was determined that the RFR Project would not result in any agricultural impacts.

## 2.3 Impacts Associated with Project Modifications

**2. 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? No Impact.**

**2. b). Conflict with existing zoning for agricultural use or conflict with a Williamson Act contract? No Impact.** As outlined in the previous environmental documents,<sup>4</sup> the CSI facility is located within a heavy industrial portion of unincorporated San Bernardino County. The Project Site is all industrial and the area surrounding the Project Site is primarily industrial. There is no prime farmland, unique farmland, farmland of statewide importance, or lands zoned for agricultural uses within two miles of the Project Site.<sup>5</sup> All project modifications will occur within the confines of the Project Site. Therefore, the Project modifications would not convert any farmland to non-agricultural uses. Further, the Project modifications would not conflict with zoning for agriculture or a Williamson Act contract as none are located near the Project Site.

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<sup>4</sup>SB County, 2001, Draft EIR, Appendix A, pages 18.

<sup>5</sup> California Department of Conservation, California Farmland Finder. Available at: <https://maps.conservation.ca.gov/DLRP/CIFF/>



**2. 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))?** No Impact.

**2. d). Result in the loss of forest land or conversion of forest land to non-forest use?** No Impact.

**2. 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?** No Impact. For the same reasons, the Project modifications would not conflict with zoning for forest land or the loss of forest land as no such resources are located within or adjacent to the CSI facility. Therefore, the Project modifications would not result in the conversion of farmland to non-agricultural use or conversion of forest land to non-forest uses.

## **2.4 Conclusion**

Based on the above, the Project modifications would not result in any significant change in agricultural or forestry resources as none are located in the vicinity of the Project Site. Since no potentially significant adverse impacts to agriculture or forestry resources were identified, no mitigation measure or further evaluation is required.

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant</i>	<i>No Impact</i>
<b>III. AIR QUALITY</b> - Where available, the significance criteria established by the applicable air quality management district or air pollution control district might be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>SUBSTANTIATION:</b> <i>(Discuss conformity with the Mojave Desert Air Quality Management Plan, if applicable):</i>				
<b>San Bernardino County General Plan, 2020; SCAQMD 2022 AQMP, Submitted Project Materials</b>				

### 3.1 Environmental Setting

The Project Site is located within the South Coast Air Basin (Basin) which consists of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The climate in the Basin generally is characterized by sparse winter rainfall and hot summers tempered by cool ocean breezes. A temperature inversion, a warm layer of air that traps the cool marine air layer underneath it and prevents vertical mixing, is the prime factor that allows contaminants to accumulate in the Basin. The mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, and Santa Ana winds. The climate of the area is not unique, but the high concentration of mobile and stationary sources of air contaminants in the western portion of the Basin, in addition to the mountains, which surround the perimeter of the Basin, contribute to poor air quality in the region.

The sources of air contaminants in the Basin vary by pollutant but generally include on-road mobile sources (e.g., automobiles, trucks and buses), off-road mobile sources (e.g., airplanes, ships, trains, construction equipment, etc.), residential/commercial sources, and industrial/manufacturing sources. Mobile sources are responsible for a large portion of the total Basin emissions of several pollutants, including nitrogen oxides (NOx) and volatile organic compound (VOC) emissions, both of which are precursors to ozone.

Criteria air pollutants are those pollutants for which the federal and state governments have established ambient air quality standards or criteria for outdoor concentrations in order to protect public health with a margin of safety. NAAQS were first authorized by the federal Clean Air Act of 1970 and have been set by the U.S. EPA. California Ambient Air Quality Standards (CAAQS) were authorized by the state legislature in 1967 and have been established by CARB. Air quality of a region is considered to be in attainment of the standards if the measured concentrations of air pollutants are maintained at equal to or less than the standards. Both the NAAQS and the CAAQS are periodically revisited and revised based on the most recent scientific information on health effects.

Health-based air quality standards have been established by the U.S. EPA and CARB for ozone (O<sub>3</sub>), carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), particulate matter less than ten microns in diameter (PM<sub>10</sub>), particulate matter less than two and a half microns in diameter (PM<sub>2.5</sub>), sulfur dioxide (SO<sub>2</sub>), and lead. The California standards are equivalent to or more stringent than the federal air quality standards. California also has established standards for sulfate, visibility, hydrogen sulfide, and vinyl chloride. Hydrogen sulfide and vinyl chloride currently are not monitored in the Basin because they are not a regional air quality problem, but are generally associated with localized emission sources.

The Basin is designated as non-attainment for PM<sub>2.5</sub> and ozone for both state and federal standards. The Basin, including the revised project area, is classified as attainment for both the state and federal standards for NO<sub>2</sub> (except the federal 1-hr standard is unclassifiable/attainment), SO<sub>2</sub>, CO, sulfates, and lead and classified as attainment for the federal PM<sub>10</sub> standards, but non-attainment for the state PM<sub>10</sub> standards and lead in Los Angeles County.

### **Regional Air Quality**

The SCAQMD monitors levels of various criteria pollutants at 39 monitoring stations located throughout the SCAQMD's entire area of jurisdiction, hereafter referred to as the Basin. Based on the most recent monitoring data published for 2023, the Basin exceeded the federal and state standards for ozone at most monitoring locations on one or more days. The state one-hour ozone standard was exceeded in the Basin 76 days in 2023. The San Bernardino Mountains and the East San Bernardino Valley exceeded standards most frequently. Other areas that exceeded the state ozone standards included the San Gabriel Valley, San Fernando Valley, Santa Clarita Valley, North Orange County, and Riverside County including the Coachella Valley. The federal and state eight-hour ozone standards were both exceeded on 115 days in the Basin in 2023 (SCAQMD, 2023).

In 2023, the state and federal maximum concentrations of CO were not exceeded in the Basin. Because of improving CO air quality, in 2005 the SCAQMD adopted and submitted to U.S. EPA a CO attainment re-designation request and CO maintenance plan. U.S. EPA declared the Basin as a maintenance area for CO in 2007 (SCAQMD, 2023).

The federal PM<sub>10</sub> standards were not exceeded in the Basin in 2023. Because of improving PM<sub>10</sub> air quality, the U.S. EPA declared the Basin as a maintenance area for PM<sub>10</sub> on June 26, 2013. The state PM<sub>10</sub> standard was exceeded at many monitoring locations in the Basin in 2023 including central Los Angeles County, coastal Los Angeles County, San Gabriel Valley, Orange County, Riverside County, the Coachella Valley, and San Bernardino County. The state PM<sub>10</sub>

standard was exceeded 158 times in the Basin in 2023. The federal PM2.5 standard was exceeded 4 times in 2023. In 2023, neither federal nor state standards for NOx, SOx, CO, lead, or sulfates were exceeded. Currently, the district is in attainment with the ambient air quality standards for NOx, SOx, CO, and lead (SCAQMD, 2023).

### **Local Air Quality**

The Project Site is located closest to the SCAQMD's Northwest San Bernardino Valley monitoring station (Station #32). Air quality in the San Bernardino Valley monitoring area complies with the state and federal ambient air quality standards for CO, NOx, SOx, lead, and sulfate, and the federal and state PM10 standard. The air quality in San Bernardino Valley is not in compliance with the federal and state ozone standards, (SCAQMD 2023).

### **3.2 Previous Environmental Review**

The project impacts associated with the RFR Project were determined to result in air emissions associated with short-term construction activities, stationary source emissions related to the operation of Furnace No. 5 and its downstream production devices, and increased usage of vehicles (new employees), trucks for shipment and trains for the delivery of steel slabs.<sup>6</sup>

Construction activities were estimated to take place on a 0.75 acre site within the existing CSI Facility over a six-month period. The emissions associated with short-term construction activities were expected to be well below the SCAQMD significance thresholds and therefore, less than significant.<sup>6</sup>

The RFR Project was expected to result in stationary source emissions associated with Furnace No. 5, increases in the production line, as well as emission reductions associated with the installation of SCR equipment. Emission increases were also associated with mobile sources including additional automobile trips, increases in truck trips (up to 60 trucks per day), and increased locomotive emissions associated with the delivery of steel slabs. Emissions from stationary sources were required to be offset per SCAQMD regulations. The overall air emission impacts from the RFR Project were expected to be below significance thresholds as shown in Table 5 below.

The RFR Project was expected to result in an increase in toxic air contaminants (TACs) from the operation of the new equipment, including emissions of acetaldehyde, benzene, formaldehyde, and ammonia. A health risk assessment (HRA) was prepared for the RFR Project and the calculated health risk were below significance thresholds as shown in Table 6.

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<sup>6</sup> See SB County, 2001, Draft EIR, pages 4-15 through 4-30.

**TABLE 5**

**RFR Overall Emissions and Impacts<sup>(1)</sup>**

	CO	NOx	PM10	SOx	VOC
Stationary Sources	494	-114	246	20	13
Mobile Sources	55	176	35	-	20
Offsets <sup>(2)</sup>	-484	-367	-273	-22	-14
Net Total	-26	-305	8	-2	19
CEQA Thresholds	550	55	150	150	55
Significant	No	No	No	No	No

(1) See SB County, 2002, Final EIR, Table 4.2-9 and Draft EIR, Table 4.2-8, page 14-29.

(2) Offsets were required for stationary sources

**TABLE 6**

**RFR Project Residential and Worker Risk Impacts<sup>(1)</sup>**

	Cumulative Risk		
	Cancer Risk	Chronic Hazard Index	Acute Hazard Index
Maximum Residential Risk	5.47 x 10 <sup>-7</sup>	5.01 x 10 <sup>-3</sup>	2.53 x 10 <sup>-3</sup>
Maximum Worker Risks	4.93x10 <sup>-7</sup>	1.16 x 10 <sup>-2</sup>	5.16 x 10 <sup>-3</sup>
SCAQMD Risk Significance Threshold	10 x 10 <sup>-6</sup>	1.0	1.0
Risk Impact Significant	NO	NO	NO

(1) See SB County, 2001, Draft EIR, Table 4.3-1, 4-33 and 4-34.

**3.3 Impacts Associated with Project Modifications**

**3. a). Conflict with or obstruct implementation of the applicable air quality plan?** No Impact. The 2022 Air Quality Management Plan (AQMP) demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law (SCAQMD, 2022). Growth projections from local general plans adopted by cities in the District are provided to the Southern California Association of Governments (SCAG), the agency that develops regional growth forecasts, and they are then used to develop future air quality forecasts for the 2022 AQMP. Development consistent with the growth projections in the County of San Bernardino General Plan is considered to be consistent with the 2022 AQMP. The County General Plan designates the CSI facility as Regional Industrial so the Project modifications are consistent with this land use and consistent with the 2022 AQMP.

Additionally, the Project modifications will be required to comply with applicable SCAQMD requirements for new stationary sources. Compliance with established rules ensures the integrity of the emission inventories in the 2022 AQMP. For example, new and modified emission sources, including the Project modifications, are subject to the SCAQMD Regulation XIII - New Source Review, will be required to be equipped with Best Available Control Technology (BACT), and will require Emission Reduction Credits (ERCs) to offset any emission increases greater than one pound per day. Based the analysis above, the Project modifications are not expected to conflict with or obstruct implementation of the applicable air quality plan or diminish an existing air quality rule or future compliance requirement resulting in a significant increase in any air pollutants.

**3. b). Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a non-attainment area for an applicable federal or state ambient air quality standard?** Less than Significant Impact. The Project modifications are expected to result in an increase in air emissions associated with short-term construction activities and new stationary source equipment. The air quality impacts of these activities and equipment are evaluated below.

**Construction Emissions**

The Project modifications will require construction activities to construct the new #3 CGL line and install the new PPPL Construction equipment for the Project modifications may include cranes, forklifts, loader/backhoes, graders, compactor, excavator, air compressors, and welders. The construction equipment is assumed to operate up to eight hours per day during most of the construction period. Emission factors for construction equipment were taken from the Construction Equipment Emissions tables in CARB's OFFROAD 2021 Inventory Model. Vehicle emissions include construction worker vehicles, pick-up trucks, flatbed trucks, dump trucks, water trucks, semi-tractors, concrete trucks, and delivery trucks. Primary emissions generated would include combustion emissions from mobile sources while operating and idling. Construction emissions include emissions from construction worker vehicles traveling to and from the work site. On-road vehicle emissions were calculated using EMFAC2021 emission factors for the South Coast Air Basin. Estimated air emissions from construction activities are included in Table 7, with more detailed calculations in Appendix A.

**TABLE 7**

**Peak Construction Emissions**

<b>Pollutant</b>	<b>Total Peak Construction Emissions (lbs/day)</b>	<b>Year/Month When Peak Occurs</b>	<b>SCAQMD Significance Threshold</b>	<b>Significant Impact?</b>
VOC (lbs/day)	1.34	Yr 2/Mo 3	75	No
CO (lbs/day)	50.71	Yr 1/Mos 6-7	550	No
NOx (lbs/day)	32.50	Yr 1/Mos 6-7	100	No
SOx (lbs/day)	0.19	Yr 1/Mos 6-7	150	No
PM10 (lbs/day)	8.22	Yr 1/Mos 6-7	150	No
PM2.5 (lbs/day)	2.75	Yr 1/Mos 6-7	55	No

Construction emissions are expected from the following equipment and processes:

- On-site construction equipment (loaders, backhoes, forklifts, etc.);
- On-site and off-site vehicle emissions, including delivery trucks and worker vehicles;
- On-site fugitive dust associated with site construction activities;
- On-site and off-site fugitive dust associated with travel on unpaved and paved roads; and,
- Painting.

Construction emissions were calculated for peak day construction activities in each month construction is expected to occur. Daily construction emissions were calculated for the peak

construction day activities and are presented in Table 7. Peak day emissions are the sum of the highest potential daily emissions from all construction sources, which include employee vehicles, fugitive dust sources, construction equipment, and transport activities for the construction period. Total peak construction emissions for all pollutants other than VOCs occur in Year 1, Months 6-7. Peak VOC emissions occur in Year 2, Month 3. Detailed construction emissions calculations are provided in Appendix A. As shown in Table 7, the construction emissions are expected to be below the SCAQMD significance thresholds, as was the case with the previous environmental review. Construction of the current Project modifications will not overlap with the approved RFR Project construction since the construction of Furnace No. 5 is already complete. Therefore, air quality construction impacts are less than significant.

### **Stationary Source Emissions**

Increases in air emissions from the Project operations are expected from stationary sources including the two new #3 CGL heaters, plus the afterburners, the emergency stand-by generator, the cleaning and chem treat sections of the #3 CGL, the coating line, and the PPPL. The emission estimates are provided in Table 8 and detailed emission calculations are provided in Appendix B. The project emission sources include the use of BACT equipment, where available. Emission control equipment includes the use of SCR on the CGL heaters to reduce NOx emissions, and a thermal oxidizer on the coating line to reduce ROG emissions. The emission estimates in Table 8 includes the use of these emission control devices. Further, under SCAQMD regulations emission increases from stationary source require offsets.

**TABLE 8**

**Project Modifications Stationary Source Emission Estimates (lbs/day)<sup>(1)</sup>**

Sources	Emissions (lbs/day)					
	NOx	SOx	CO	PM10	PM2.5	ROG
SCAQMD Significance Threshold	55	150	550	150	55	55
CGL Heaters	38.45	1.28	79.03	15.46	15.46	11.19
CGL Cleaning Section	--	--	--	4.94	4.94	--
CGL Chem Treat	--	--	--	0.93	0.93	--
Coating Line	8.64	0.14	17.76	1.74	1.74	1.26
Push-Pull Pickle Line	--	--	--	10.91	10.91	--
Emergency Engine	1.98	0.02	10.32	0.09	0.09	0.56
TOTAL Emissions	49.07	1.44	107.11	34.05	34.05	13.00
Offset Emissions <sup>(2)</sup>	-49.07	-1.73	0	-40.87	0	-1.6
Emissions After Offset	0	-0.56	107.11	-6.81	34.05	-2.60
Significant Impact?	No	No	No	No	No	No

(1) See Appendix B for detailed emission calculations.

(2) Emission offsets will be required for the Project modifications by SCAQMD under Regulation XIII – New Source Review, and under Regulation 2005 – RECLAIM New Source Review. Absence emission offsets, the project itself would be less than SCAQMD CEQA significance thresholds.

The Project modifications will also not result in an increase in steel slabs received, change the volume of material produced, or increase the amount of finished product produced by the CSI

facility. The RFR Project replaced the Furnace No. 2 with a new Furnace No. 5 and increased the production at the plant by 19 percent (from 1.664 million tons per year to 1.98 million tons per year). The Project modifications would increase the CSI facility's ability to produce galvanized and aluminum zinc alloy coated sheet products from 600,000 tons/year to 1,100,000 tons per year while maintaining overall steel production within previously approved levels (i.e., no greater than 1.98 million tons per year). The Project modifications allow for CSI to produce more galvanized steel when the market demands more; however, if more galvanized steel is produced then less cold-rolled or hot-rolled steel (or other steel product) would be produced. Therefore, the Project modifications would not result in any increase in mobile sources and the volume of trucks and railcars that visit the CSI facility (see Table 2) is not expected to increase over those volumes evaluated in the 2002 Final EIR for the RFR Project.

Absence emission offsets, the Project modifications themselves would be less than SCAQMD CEQA significance thresholds. Furthermore, as shown in Table 8, because of the SCAQMD offset requirements, no increase in emissions is expected for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, or ROG due to the Project modifications. The emissions of CO and PM<sub>2.5</sub> would be less than the SCAQMD New Source Review (NSR) offset thresholds and below SCAQMD CEQA significance thresholds. Therefore, the air quality impacts associated with the Project modifications are expected to be less than significant. In addition, when combined with the RFR Project, the overall air quality impacts associated with criteria air pollutants remain below the SCAQMD significance threshold and less than significant.

**3. c). Expose sensitive receptors to substantial pollutant concentrations?** Less than Significant Impact. The Project modifications may result in an increase in TACs from the operation of the new equipment, primarily from strontium chromate, diesel particulate matter, and natural gas combustion, which includes emissions of acetaldehyde, acrolein, ammonia, benzene, ethylbenzene, formaldehyde, naphthalene, hexane, polycyclic aromatic compounds (PAHs), propylene, toluene, xylenes, and ammonia. An HRA was prepared by ALG (see Appendix C) for the Project modifications and the results are shown in Table 9 below. As shown in Table 9, the health risk associated with the Project modifications are less than the SCAQMD significance thresholds. Therefore, health risks are expected to be less than significant.

**TABLE 9**

**Project Modifications TAC Risk Impacts<sup>(1)</sup>**

	Project Risk		
	Cancer Risk	Chronic Hazard Index	Acute Hazard Index
SCAQMD Risk Significance Threshold	10 x 10 <sup>-6</sup>	1.0	1.0
Maximum Residential Risk	0.153 x 10 <sup>-6</sup>	0.011	--
Maximum Worker Risk	0.065 x 10 <sup>-6</sup>	0.060	--
Maximum Sensitive Population Risk	0.097 x 10 <sup>-6</sup>	0.007	--
Maximum Acute Risk	--	--	0.028
Risk Impact Significant?	NO	NO	NO

(1) See Appendix B for detailed HRA calculations.



**3. d). Result in other emissions (such as those leading to odors adversely affecting substantial number of people?)** Less than Significant Impact.

The Project modifications include the addition of new #3 CGL and PPPL equipment. The CSI facility currently operates the same type of equipment and the Project modifications will expand their ability to produce galvanized steel, as well as pickled and oil steel. The Project also includes the use of BACT and the installation of an afterburner and selective catalytic reduction system to control emissions from the heaters, the installation of filters to control emissions from the cleaning section, roll coaters, and push pull pickle line, and a thermal oxidizer to control emissions from the coating operation. The Project modifications are not expected to add new chemicals or generate odors. The equipment will be installed within buildings and emissions will be controlled as required by the SCAQMD. Therefore, the Project modifications are not expected to generate significant odor emissions.

**3.4 Conclusions**

Based on the above, the Project modifications would not result in any significant change in air quality impacts as air quality impacts are less than significant. Since no potentially significant adverse impacts to air quality were identified, no mitigation measures or further evaluation is required.

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

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**SUBSTANTIATION:** (Check if project is located in the Biological Resources Overlay or contains habitat for any species listed in the California Natural Diversity Database );

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**San Bernardino County General Plan, 2020; Submitted Project Materials; Add in Studies here**

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#### 4.1 Environmental Setting

No biological resources are known to occur at the Project Site or surrounding area. The Project Site is developed and/or a completely paved, industrial site lacking vegetation, and devoid of potential habitat. The surrounding area is developed as well with mostly industrial uses. The Project Site is not located in within a County-identified Biological Resource Overlay area. As such, no candidate, sensitive, or special status species are known to occur at the Project Site or the surrounding area. The Site and surrounding areas are paved and highly industrialized, and do not provide nor are they proximate to riparian habitat or other sensitive natural communities. No wetlands or other jurisdictional waters of the U.S. are on or near the Project Site. The Project Site is not near a wildlife corridor; or stream used by anadromous fish. No biological resources subject to local protective policies or ordinances are known to occur within or near the Project Site. No adopted conservation plans applicable to the Project Site or immediately surrounding areas are known to exist.

#### 4.2 Previous Environmental Review

Items a) through f). The previous environmental evaluation concluded that no biological resources of value or resources subject to local ordinances or conservation plans are at the Project Site, the project area, or immediately surrounding areas that could be affected by either construction or operation of the RFR Project.<sup>7</sup> No impacts to biological resources were expected.

#### 4.3 Impacts Associated with Project Modifications

**4. 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? No Impact.**

**4.b). Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? No Impact.**

**4. c). Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means? No Impact.**

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<sup>7</sup> See SB County, 2001, Draft EIR, Appendix A, pages 27-28.

**4. 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? No Impact.**

**4. e). Conflicting with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? No Impact.**

**4. 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? No Impact.**

The Project modifications would be located within the confines of the existing Project Site, which is a heavy industrial site that is devoid of native habitat. The #3 CGL will be built within the existing Plate Mill building and the new PPPL will go inside an existing building. Therefore, the Project modifications will be located on sites with existing buildings where no vegetation, natural communities, riparian habitat or wetlands are present. Therefore, no biological resources of value or resources subject to local ordinances or conservation plans are at the Project Site and surrounding areas that could be affected by either construction or operation of the Project modifications. The Project modifications will not impact trees or other vegetation used by migratory bird or corridors. Finally, the Project modifications would not conflict with an adopted habitat conservation plan, natural community conservation plan, or other approved habitat conservation plan as no such plan is applicable to the Project Site. No impacts to biological resources would occur.

#### **4.4 Conclusion**

Based on the above, the Project modifications would not result in any significant change in biological resources as no biological resources of value are located in the vicinity of the Project Site. Since no potentially significant adverse impacts to biological resources were identified, no mitigation measures or further evaluation is required.

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant</i>	<i>No Impact</i>
<b>V. CULTURAL RESOURCES - Would the project:</b>				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Disturb any human remains, including those outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**SUBSTANTIATION:** (Check if the project is located in the Cultural  or Paleontologic  Resources overlays or cite results of cultural resource review): **San**

***Bernardino County General Plan, 2020; Cultural Historical Resources Information System (CHRIS), South Central Coast Information Center, California State University, Fullerton; Duke Cultural Resources Records Search (Duke, 2023); Submitted Project Materials***

### 5.1 Environmental Setting

The Project Site has been used as a steel mill since the 1940's and, historically, associated with the former Kaiser steel mill, which is a County Point of Historical Interest as an example of area industrialization. All major components of the Kaiser still mill have been demolished for the construction of the Auto Club Speedway. The Project Site has been used for heavy industrial purposes for decades.

The Project Site and surrounding areas are not located within a Cultural or Paleontological Resources Overlay. No known or suspected archaeological or historic resources exist in the area, as identified by the County Museum Archaeological Information Center. Nor is the Project Site known to have high potential for paleontological resource sensitivity. The Project Site and surrounding area are located in the Santa Ana River Valley, in an area identified as having low potential for prehistoric archaeological resources. The Project Site and immediately surrounding areas are not known to contain historic or archaeological resources as defined in Section 15064.5 of the CEQA Guidelines.

## 5.2 Previous Environmental Review

Items a) through d). The previous environmental evaluation<sup>8</sup> concluded that neither construction nor operation of the RFR Project was expected to result in significant impacts to cultural resources for the following reasons:

- No known cultural or paleontological resources or human remains have been discovered at the facility;
- The RFR Project is industrial in nature, and the industrial project would not interfere with the historic value of the former Kaiser steel mill site as an industrial County Point of Historic Interest; and
- As a condition of approval, San Bernardino County required CSI to cease construction and consult a professional archaeologist should subsurface archaeological resources be discovered at the site.

Given the nature of the Project Site, the low probability of finding undiscovered cultural resources at the site, the potential impact to cultural resources was considered less than significant.

## 5.3 Impacts Associated with Project Modifications

**5. a). Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?** Less than Significant Impact. The Project modifications would be located within the confines of the existing Project Site, which is a heavy industrial site. The #3 CGL will be built on the existing warehouse footprint, and the new PPPL will go inside an existing building. Therefore, the Project modifications will be located on sites within existing buildings which have been previously developed.

CEQA Guidelines state that “generally, a resource shall be considered ‘historically significant’ if the resource meets the criteria for listing in the California Register of Historical Resources including the following:

- Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- Is associated with the lives of persons important in our past;
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values;

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<sup>8</sup> See SB County, 2001, Draft EIR, Appendix A, pages 29-30.

- Has yielded or may be likely to yield information important in prehistory or history” (CEQA Guidelines Section 15064.5).

Duke CRM conducted a records search at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton. The records search included a review of all recorded cultural resources within a ½ mile radius of the Project, as well as a review of known cultural resource surveys and excavation reports. The SCCIC identified one cultural resource, the former Kaiser Steele Mill. The plant became a California Point of Interest in 1975. However, subsequent reports have determined that the plant has been modified since it was originally recorded and no longer retains the original characteristics that would deem it eligible for listing in the California Register of Historical Resources (CRHR) or National Register of Historical Places (NRHP) (Duke CRM, 2023). Therefore, the project impacts on historic resources are considered less than significant.

**5. b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?** No Impact. Duke CRM conducted a records search at the SCCIC and only identified the Kaiser Steele Mill as a point of interest as discussed above. The SCCIC did not identify any other cultural, prehistoric or archaeological resources within a ½ mile radius of the Project (Duke CRM, 2023). Considering the previous industrial use of the land and taking into account previous and current site activities, no archaeological resources have been identified at the Project Site that would be affected by either construction or operation of the Project modifications. The #3 CGL will be built within the existing Plate Mill building and the new PPPL will go inside an existing building. No impacts to archaeological resources would occur.

**5. c). Disturb any human remains, including those interred outside of formal cemeteries?** No Impact. During previous ground-disturbing activities on the former Kaiser steel mill property, including the project area at the Project Site, no human remains, including those interred outside of formal cemeteries, have been encountered. Because of the heavy industrial use and the Project will be located in areas that have already been developed, Project activities are not expected to disturb human remains.

#### **5.4 Conclusions**

Based on the above, the Project modifications would not result in any significant change in cultural or historic resources as none are known to be located in the vicinity of the Project Site. Since no potentially significant adverse impacts to cultural, archaeological or historic resources have been identified, no mitigation measures or further evaluation is required.

Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
<b>VI. ENERGY – Would the project:</b>				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**SUBSTANTIATION: San Bernardino County General Plan, 2020; Submitted Materials**

**6.1 Environmental Setting**

Energy to the Project Site is provided by Southern California Edison for electricity and Southern California Gas Company for natural gas. Energy demand in San Bernardino County was 16,181 gigawatt hours (GWh) in 2021, with residential electricity use at 5,800 GWh (26%) and non-residential electricity use at 13,280 GWh (82%).<sup>9</sup> CSI currently uses an average of 16.6 GWh per month or 199.2 GWh per year.

The energy use associated with natural gas in San Bernardino County was a total of 561 million therms<sup>10</sup> in 2021, with residential use at 256 million therms (46%), and non-residential natural gas use at 305 million therms (54%).<sup>11</sup> CSI currently uses approximately 2.17 million therms per month or 26 million therms per year.

Renewable energy resources are also provided by SCE through wind, biomass, landfill gas, and hydroelectric energy generation. As part of the County’s Countywide Plan, SCE’s active renewable energy power plants included four wind energy facilities, one biomass energy facility, one landfill gas facility, and 14 hydroelectric energy facilities. Together, these 20 facilities had the capacity to generate up to 1,733 megawatts (MW), or 1,733,000 kilowatts (KW), of energy. Future development of new facilities and expansion of existing facilities beyond what is included in the Countywide Plan is also planned, which would create 13 additional facilities and 394 additional MW of energy capacity (SB County, 2020).

**6.2 Previous Environmental Review**

The RFR Project included the replacement of Furnace 2 (330 million Btu/hr) with a more energy efficient Furnace No. 5 (533 mmBtu/hr). Furnace No. 5 required an irrevocable commitment

<sup>9</sup> California Energy Commission, <https://ecdms.energy.ca.gov/elecbycounty.aspx>

<sup>10</sup> One therm is equivalent to 99.9761 cubic feet of natural gas.

<sup>11</sup> California Energy Commission, <https://ecdms.energy.ca.gov/gasbycounty.aspx>



of non-renewable resources of electricity and natural gas. Non-renewable resources were committed primarily in the form of fossil fuels including gasoline, natural gas and diesel fuels used by construction equipment and vehicles and for production of product.

Additional electricity for the RFR Project was provided through existing connections. The construction of Furnace 5 required a new meter and connections to existing natural gas lines, but no new transmission systems were required. All impacts were determined to be less than significant.

Development of Furnace No. 5 was in accordance with all applicable building and development code requirements for energy savings and reduction of air emissions. Non-renewable energy sources (such as wind and solar energy) were determined to be not readily available for widespread use for the RFR Project.<sup>12</sup>

### 6.3 Impacts Associated with Proposed Modifications

**6. a). Result in potentially significant environmental impact due to wasteful, inefficient or unnecessary consumption of energy resources, during project construction or operations?** Less than Significant Impact. Electricity to the Project Site is provided by Southern California Edison. The Project modifications are expected to require 1.12 GWh per month (13.44 GWh per year), **an approximately 6.7 percent increase** over current use. Electricity for the Project modifications can be provided by Southern California Edison Company. No extensions are required as the Project Site is served by electric power of the appropriate voltage to operate the improvements. The increase is minor (less than 1 percent) when compared to the current use of electricity in the County 16,181 GWh per year.

Natural gas to the Project Site is provided by the Southern California Gas Company. The Project modifications are expected to require an additional 17,486 mmBtu per month or 0.17 million therms per month (2.04 million therms per year), an approximately 8 percent increase over current use. Natural gas for the Project modifications can be provided by Southern California Gas Company with the existing infrastructure at the site and no extensions are required. The increase is minor (less than 1 percent) when compared to the current use of electricity in the County which is estimated 561 million therms per year.

Energy used at the CSI facility will be for the production of steel products that serve valuable uses in many industries including residential and commercial construction, agriculture, HVAC components, oil and gas pipelines, automotive wheels, strapping, tubing, rack systems, and many other manufacturing uses. Further, the Project modifications would replace American production capacity that will be lost due to the pending shutdown of the USS-UPI steel facility in Pittsburg, California at the end of 2023. Manufacturing essential products would not be considered a wasteful use of energy, inefficient or unnecessary consumption of energy resources and energy impacts would be considered less than significant.

**6. b). Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?** Less than Significant Impact. The Project modifications would continue the operation of steel manufacturing in California, providing a local source for the steel materials as opposed to relying on steel produced in other parts of the United States or the world. The

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<sup>12</sup> See SB County, 2001, Draft EIR, pages 7-1 and Appendix A, pages 59-60.

Project modifications would not conflict or obstruct a state of local plan for renewable energy or energy efficiency. California's renewables portfolio standard (RPS) requires retail sellers of electricity to increase their procurement of eligible renewable energy resources by at least one percent per year, so that 20 percent of their retail sales were procured from eligible renewable energy resources by 2017. The RPS was further modified to require retailers to reach 33 percent renewable energy by 2020 and 50 percent by 2030. The Project modifications would not hinder Southern California Edison's ability to meet these requirements as it is a small fraction of their electrical generation. Further, the Project would be required to adhere to all applicable federal, State, and local requirements for energy efficiency, including the latest Title 24 standards, as applicable. Therefore, the Project modifications would not conflict or obstruct a state of local plan for renewable energy or energy efficiency and energy impacts are considered less than significant.

#### **6.4 Conclusion**

Based on the above, the Project modifications would not result in any significant change in the impacts on energy, as evaluated under the utilities and service systems section of the RFR Project, and the Project impacts will remain less than significant. Since no potentially significant adverse impacts to energy were identified, no mitigation measures or further evaluation of energy is required.

	<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant</i>	<i>No Impact</i>
<b>VII.</b>	<b>GEOLOGY AND SOILS - Would the project:</b>				

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

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

ii. Strong seismic ground shaking?

iii. Seismic-related ground failure, including liquefaction?

iv. Landslides?

b) Result in substantial soil erosion or the loss of topsoil?

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

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

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

- f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

**SUBSTANTIATION:** (Check  if project is located in the Geologic Hazards Overlay District): **San Bernardino County General Plan, 2020; Submitted Project Materials**

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**San Bernardino County General Plan, 2020; Submitted Project Materials**

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## 7.1 Environmental Setting

The Project Site is not located in a Geologic Hazards Overlay District; as such the Project and surrounding areas are not known by the California Division of Mines and Geology to be subject to seismic induced ground rupture or liquefaction, nor is it known by the U.S. Geological Survey to be at risk from landslide or mudslide events. The Project Site is not in an Alquist-Priolo Special Studies Zone, and is therefore not identified as at risk from surface rupture during an earthquake event (SB County, 2020b). Some of the conditions for liquefaction exist at the Project Site, while other essential conditions are lacking. It is underlain by coarse-grained alluvial sediments, including gravels and sands, from drainage of the San Gabriel foothills through Lytle Creek Canyon. Near-surface sediments are uncemented and unconsolidated. However, groundwater is at approximately 300 to 400 feet below ground surface of the project area, and the potential for liquefaction is negligible (SB County, 2020c). The Project Site and surrounding areas are virtually flat, sloping from zero to less than five percent. As a result, the potential for landslides is negligible. In addition, the combination of gentle terrain and extensive paving result in negligible potential for erosion by water or wind.

## 7.2 Previous Environmental Review

a, c and d) Conditions necessary for ground rupture to occur do not exist at the Project Site, and the potential fault rupture to occur is negligible. Strong ground shaking could occur during an earthquake, during either construction or operation of the RFR Project. Shaking of the intensity possible in the area could pose a potential substantial threat to property and/or humans. This was considered a potentially significant impact.<sup>13</sup> Further, the potential for expansive soils was considered potentially significant. Compliance with the RFR Project conditions of approval ensured that the impacts would be less than significant so no mitigation measures were required.

b) The flat topography of the Project Site in combination with the stable surface soils were expected to result in negligible water or wind erosion. Approximately 2,500 cubic yards of material was estimated to be excavated for the footings of the furnace and building associated with the previously approved RFR Project. This material was used locally on the CSI property to correct grades, stabilize older structures, and for general maintenance and small construction project purposes. The RFR Project was not anticipated to result in erosion or a loss of topsoil.

e) The Project Site is served by a sanitary sewer system. Septic tanks were not an element of the Project Site, so no impacts to septic or alternative waste disposal systems would occur.

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<sup>13</sup> See SB County, 2001, Draft EIR, pages 4-1 through 4-14.

f) The Project Site is located in an areas identified as having low or moderate potential for paleontological resources. No known unique paleontological resources or unique geologic features are known to occur at the Project Site or the surrounding areas, so impacts on paleontological resources were expected.

### 7.3 Impacts Associated with Project Modifications

**7. a). Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42); ii) Strong seismic ground shaking; iii) seismic-related ground failure, including liquefaction; iv) Landslides? Less than Significant Impact.**

**7. 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 onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse? Less than Significant Impact.**

**7. d). Be located on expansive soil, as defined in Table 18-1-B of the California Building Code, creating substantial direct or indirect risks to life or property? Less than Significant Impact.**

Southern California, including San Bernardino County, is a seismically active region. The most significant potential geologic hazard at the CSI facility is estimated to be seismic shaking from future earthquakes generated by active or potentially active faults in the region, including the San Andreas, Rialto-Colton, San Jacinto, Whittier, Sierra Madre-San Fernando, Elsinore, and Newport-Inglewood. Past experience indicates that there has not been any substantial damage, structural or otherwise as a result of earthquakes at the Project Site.

Based on the historical record, it is highly probable that earthquakes will affect the Southern California region in the future. Research shows that damaging earthquakes will occur on or near recognized faults which show evidence of recent geologic activity. There is the potential for damage in the event of an earthquake. The hazards of a release during an earthquake are addressed in Section IX - Hazards and Hazardous Materials.

The Project modifications, including refurbished buildings and new equipment must be designed to comply with the applicable California Building Code requirements since the proposed modifications are located in a seismically active area. The California Building Code is considered to be a standard safeguard against major structural failures and loss of life. The code requires structures that will: 1) resist minor earthquakes without damage; 2) resist moderate earthquakes without structural damage, but with some non-structural damage; and 3) resist major earthquakes without collapse, but with some structural and non-structural damage. The California Building Code bases seismic design on minimum lateral seismic forces ("ground shaking"). The California Building Code requirements operate on the principle that providing appropriate foundations, among other aspects, helps to protect buildings from failure during earthquakes. The basic formulas used for the California Building Code seismic design require determination of the seismic zone and site coefficient, which represent the foundation conditions at the site.

The new equipment at the CSI facility would require building permits, as applicable, for all new structures associated with the Project modifications from the County of San Bernardino. The facility must receive approval of all building plans and building permits to assure compliance with the latest Building Code adopted by the County prior to commencing construction activities. The issuance of building permits from the local authority will assure compliance with the California Building Code requirements which include requirements for building within seismic hazard zones. No significant adverse impacts from seismic hazards are expected since new equipment would be required to comply with the California Building Code.

The Project modifications would not alter the exposure of people or property to geological hazards such as earthquakes, landslides, mudslides, ground failure, expansive soils, or other natural hazards beyond the current setting. As a result, substantial exposure of people or structures to the risk of loss, injury, or death involving the rupture of an earthquake fault, seismic ground shaking, liquefaction or landslides is not anticipated. Therefore, the Project modifications will not alter the conclusions from the 2002 Final EIR for the CSI Reheat Furnace Replacement Project with respect to impacts associated with earthquakes.

**7. b). Result in substantial soil erosion or the loss of topsoil?** No Impact. The flat topography of the Project Site in combination with the stable surface soils is expected to minimize the potential for water or wind erosion. The #3 CGL will be built within the existing No. 2 Plate Mill building and the new PPPL will go inside an existing building. Therefore, the Project modifications will not require substantial grading or alter the site topography. The Project modifications are not anticipated to result in erosion or a loss of topsoil.

**7. e). Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater?** No Impact. The Site is served by a sanitary sewer system. Septic tanks are not an element of the Project modifications and no septic system is used at the CSI facility. Therefore, no impacts to septic or alternative waste disposal systems would occur.

**7. f). Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?** No Impact. The Project site is located in an area identified as having low or moderate potential for paleontological resources. No known unique paleontological resources or unique geologic features are known to occur at the Project Site or the surrounding areas. The #3 CGL be built within the existing Plate Mill building, and the new PPPL will go inside an existing building. Therefore, the Project modifications will occur in areas of the site that have been previously disturbed and would not require grading. Further, no major excavation activities are required as the Project Site is flat and has already been developed. Therefore, the Project will not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, so no impacts on paleontological resources are expected.

#### **7.4 Conclusion**

Based on the above, the Project modifications would not result in any significant change in the impacts on geology and soils, as evaluated in the 2002 Final EIR for the CSI RFR Project, and the Project impacts will remain less than significant. Since no potentially significant adverse impacts to geology and soils were identified, no mitigation measures or further evaluation of geology and soils impacts are required.

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant</i>	<i>No Impact</i>
<b>VIII. GREENHOUSE GAS EMISSIONS – Would the project:</b>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

***SUBSTANTIATION:***

***San Bernardino County General Plan, 2020; Submitted Project Materials***

**8.1 Environmental Setting**

Greenhouse gases (GHGs) trap heat in the atmosphere, which in turn heats the surface of the Earth. Some GHGs occur naturally and are emitted to the atmosphere through natural processes, while others are created and emitted solely through human activities. The latter, anthropogenic sources of GHGs, is the focus of impacts under CEQA. Traditionally, GHGs and other global warming pollutants are perceived as solely global in their impacts, and that increasing emissions anywhere in the world contributes to climate change anywhere in the world.

GHGs are emitted by natural processes and human activities. The accumulation of greenhouse gases in the atmosphere regulates the earth’s temperature. Global warming is the observed increase in average temperature of the earth’s surface and atmosphere. The primary cause of global warming is an increase of GHGs in the atmosphere. The six major GHGs are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), sulfur hexafluoride (SF<sub>6</sub>), hydrofluorocarbons (HFCs), and perfluorocarbon (PFCs). The GHGs absorb longwave radiant energy emitted by the Earth, which warms the atmosphere. The GHGs also emit longwave radiation both upward to space and back down toward the surface of the Earth. The downward part of this longwave radiation emitted by the atmosphere is known as the “greenhouse effect.” Emissions from human activities such as fossil fuel combustion for electricity production and vehicles have elevated the concentration of these gases in the atmosphere.

- **Carbon dioxide (CO<sub>2</sub>)** is an odorless, colorless greenhouse gas. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (human caused) sources of CO<sub>2</sub> include burning coal, oil, gasoline, natural gas, and wood.
- **Methane (CH<sub>4</sub>)** is a flammable gas and is the main component of natural gas.
- **Nitrous Oxide (N<sub>2</sub>O)**, also known as laughing gas, is a colorless greenhouse gas. Some industrial processes such as fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions also contribute to the atmospheric load of N<sub>2</sub>O.

- **Sulfur hexafluoride (SF<sub>6</sub>)** is an inorganic, odorless, colorless, nontoxic, nonflammable gas. SF<sub>6</sub> is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.
- **Hydrofluorocarbons (HFCs)** are synthetic man-made chemicals composed of hydrogen, fluorine, and carbon that are used as a substitute for chlorofluorocarbons (whose production was stopped as required by the Montreal Protocol) for use in automobile air conditioners and refrigerants.
- **Perfluorocarbons (PFCs)** are synthetic man-made chemicals composed of fluorine and carbon that are used as a substitute for chlorofluorocarbons in producing aluminum and manufacturing semiconductors.

Scientific consensus, as reflected in recent reports issued by the United Nations Intergovernmental Panel on Climate Change, is that the majority of the observed warming over the last 50 years can be attributable to increased concentration of GHGs in the atmosphere due to human activities. Human activities are directly altering the chemical composition of the atmosphere through the buildup of climate change pollutants.<sup>14</sup>

The potential health effects from global climate change may arise from temperature increases, climate-sensitive diseases, extreme events, air quality impacts, and sea level rise. The extent of climate change impacts at specific locations remains unclear.

GHG emissions in the state have been inventoried by CARB. As shown in Table 10, transportation (primarily on-road travel) is the single largest source of GHG emissions in the state. In addition to transportation, electricity production, and industrial sources also are important contributors to GHG emissions.

CSI is required to report its GHG emissions under CARB's GHG Mandatory Reporting Program, which requires facilities and entities with more than 10,000 metric tons of carbon dioxide equivalents (or CO<sub>2</sub>e) to report emissions directly to CARB. For 2022, CSI reported 137,313 metric tons per year (as CO<sub>2</sub>e) emitted from the facility.<sup>15</sup>

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<sup>14</sup> Intergovernmental Panel on Climate Change (IPCC). 2014. *Fifth Assessment Report: Climate Change 2014*. New York: Cambridge University Press, [https://issuu.com/unipcc/docs/syr\\_ar5\\_final\\_full\\_wcover](https://issuu.com/unipcc/docs/syr_ar5_final_full_wcover), accessed on June 10, 2022.

<sup>15</sup> 2021 GHG Facility and Entity Emissions. Available at: <https://ww2.arb.ca.gov/mrr-data>.



**TABLE 10**

**2020 California GHG Inventory (million metric tons CO2e))**

<b>Sector</b>	<b>Percent of California 2020 GHG Inventory (MMT/yr)</b>	<b>Amount of California 2020 GHG Inventory (MMT/yr)</b>
Transportation	38	140.3
Industrial	23	84.9
Electricity	11	40.6
Electricity imports	5	18.5
Agriculture & Forestry	9	33.2
Residential	8	29.5
Commercial	6	22.2
<b>TOTAL</b>	<b>100</b>	<b>369.2</b>

Source: CARB, 2020 GHG Inventory. Available at:  
[https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020\\_ghg\\_inventory\\_trends.pdf](https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf)

**8.2 Previous Environmental Review**

GHG analyses were not completed as part of the 2002 Final EIR for the RFR Project so there is no comparison to the previous environmental review.

**8.3 Impacts Associated with Project Modifications**

**8. a). Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?** Less than Significant Impact. The GHG emissions from the Project modifications would be generated by both construction emissions and by operational emissions. As part of the SCAQMD thresholds for GHG emissions, construction emissions associated with a project are combined with the project’s operational emissions by amortizing the construction emissions over 30 years. The impacts are discussed below.

Construction equipment may include cranes, welders, generators, pumps, forklifts, loader/backhoes, compressors, and manlifts. Emission factors for construction equipment were taken from the Construction Equipment Emissions tables in CARB’s OFFROAD 2021 Inventory Model. Vehicle emissions include construction worker vehicles, pick-up trucks, flatbed trucks, dump trucks, water trucks, semi tractors, concrete trucks, and delivery trucks. Primary emissions generated would include combustion emissions from engines during idling and while operating. Construction emissions include emissions from construction worker vehicles traveling to and from the work site. On-road vehicle emissions were calculated using EMFAC2021 emission factors. The GHG construction emissions are shown in Table 11 and detailed emission calculations are provided in Appendix A.

The Project operations would generate GHG emissions from stationary equipment, such as heaters, the coating line, and emergency engine. The GHG emissions for stationary sources are provided in Table 11 and detailed emission calculations are provided in Appendix B. As discussed in Section 3 – Air Quality, the Project modifications would not result in any increase in mobile sources and the volume of trucks and railcars that visit the CSI facility (see Table 2) is not expected to increase over those volumes evaluated in the 2002 Final EIR for the RFR Project so no additional GHG emissions are expected from mobile sources.

**TABLE 11**

**Project Modifications GHG Emissions**

<b>Emission Source</b>	<b>GHG Emissions (MT/yr CO<sub>2</sub>e)</b>
On-Site GHG Emissions	
CGL Heaters	41,399
Emergency Standby Engine	23.71
Thermal Oxidizer	4,652
Construction Emission Sources <sup>(1)</sup>	52.03
<b>Total On-Site Project GHG Emissions</b>	<b>46,126.19</b>
Off-Site GHG Emissions	
Off-Site Electricity Use	2,138
Water Use	3,067
Total Off-Site Project GHG Emissions	5,205
GHG Emission Offsets required <sup>(2)</sup>	46,074.16
GHG Emissions following Offset	5,257
SCAQMD CEQA GHG Threshold	10,000
Significant?	No

- (1) Per SCAQMD guidance, construction emissions are amortized for 30 years. Construction emissions do not require GHG offsets, nevertheless, the project GHG emissions are well below SCAQMD GHG CEQA thresholds.
- (2) The CSI facility is regulated under AB32 consequently all GHG emissions from on-site project modifications will require offsets per the AB32 Cap-n-Trade regulations.
- (3) See Appendix B for detailed GHG emission calculations and assumptions (ALG, 2024)..

The GHG emissions from the Project modifications are required to comply with CARB's Mandatory Reporting Rule and the AB 32 Cap-and-Trade regulations. Since the CSI facility is included in the AB32 Cap-n-Trade Program, an allowance (offset) in an amount equal to the emissions from non-biogenic sources are required to be provided for stationary sources. In addition, any electrical and natural gas use by the CSI Facility under the Project would be covered by the AB 32 Cap-and-Trade Program because the utility which provides the electricity or natural gas to the CSI facility as needed by the Project also participates in the AB 32 Cap-and-Trade Program. It should be noted that all GHG emissions from the CSI facility are regulated under CARB's Mandatory Reporting Rule and Cap-n-Trade regulations, not just those associated with the previous or Project modifications.

Based on the analysis and data in Table 11, the GHG emissions associated with the Project modifications are below the SCAQMD CEQA significance threshold and, therefore, GHG impacts would be less than significant.

**8. b). Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?** No Impact. California's regulatory setting for GHG emissions ensures that most of the existing and foreseeable GHG emission sources are subject to one or more programs aimed at reducing GHG emission levels. Similarly, electricity in California is subject to the Renewable Portfolio Standard (or RPS, as the RPS is codified pursuant to SB 350 and SB 100). The AB 32 Cap-and-Trade Program incorporates emissions associated

with all transportation fuels and the combustion of natural gas. California's GHG reduction strategies are working to achieve GHG reductions, and CARB has adopted the plan to maintain and continue reductions from all sectors of the economy.

Given the oversight of Project-related sources and progress of California's ongoing efforts to implement policies and a regulatory setting for reducing GHG emissions, the Project use of fuels and the generation of GHG emissions would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions and would comply with the policies by complying with the existing programs such as the AB32 Cap-and-Trade. The Project modifications would be consistent with the regional and SCAQMD thresholds and plans for the reduction of GHG emissions by emitting less than the GHG threshold of 10,000 MTCO<sub>2</sub>e per year. Therefore, the Project modifications will not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions.

#### **8.4 Conclusions**

Based on the above, the Project modifications would not result in any significant change in GHG emissions as GHG impacts are less than significant. Since no potentially significant adverse GHG impacts were identified, no mitigation measures or further evaluation is required.

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

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***SUBSTANTIATION:***  
***San Bernardino County General Plan, 2020; Submitted Project Materials***

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## **9.1 Environmental Setting**

The CSI facility utilizes physical and chemical processes to manufacture steel products. Some chemicals used to produce steel products are hazardous, and some are acutely hazardous. Some steel manufacturing processes result in waste streams that are hazardous. Chemicals are delivered to the facility and hazardous waste is transported by licensed and permitted transportation firms that comply with state and federal regulations for the handling of hazardous materials and hazardous wastes. In addition, all CSI personnel who work with hazardous chemicals receive state-mandated training. Workers receive hazardous materials refresher training every year, and Department of Transportation refresher training every three years.

On-site storage of hazardous chemicals occurs in accordance with state and federal requirements. For example, some chemicals are stored in tanks. In turn, these tanks are located within a berm or dike ("secondary containment") constructed of the appropriate non-reactive material. Secondary containment is sized to contain 110 to 115 percent (depending on regulatory requirements) of the largest tank in an area.

The school nearest the Project Site, Live Oak Elementary School, is located on live Oak Avenue approximately one mile north and east of the Project site. No existing or proposed schools are within one-quarter mile of the site.

The former Kaiser Steel Mill property is included on the State of California's "Cortese List" of hazardous waste and substances sites, compiled pursuant to Government Code §65962.5. Portions of the former Kaiser Steel Mill property, including portions under the control of CSI, have been and continue to be subject to site investigation/characterization and remediation implemented at the direction of the California Environmental Agency (CalEPA), Department of Toxic Substances Control (DTSC) in accordance with a DTSC Remedial Investigation Workplan. Potential impacts of the clean-up are addressed by the DTSC, and are not evaluated in this document. Characterization and remediation of areas within the limits of the Project Site is ongoing.

The Project Site is not located within the planning area of an Airport Land Use Plan. The Ontario International Airport is located approximately 6.5 miles south and west of the Project site. The Rialto Municipal is also located approximately 6 miles to the northeast.

The Project Site is located immediately north of San Bernardino Avenue, a Caltrans-designated "possible emergency route." In addition, Etiwanda Avenue north of San Bernardino Avenue is a Caltrans-designated "possible emergency route."

The Project Site is located in an urbanized and generally industrialized setting. No wildland areas are on or proximate to the Project Site or Project area.

## **9.2 Previous Environmental Review<sup>16</sup>**

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<sup>16</sup> See SB County, 2001, Draft EIR, Appendix A, pages 35-39.

a) Implementation of the previously approved RFR Project allowed increased throughput of steel products at the CSI facility, including the hot rolled, cold rolled, galvanizing, and pipe facilities by an average of 19 percent. Such an increase in production was expected to result in an increase in the use of chemicals and potential waste streams of a similar magnitude (i.e., approximately 19 percent). CSI did not expect new or expanded chemical storage would be required for process inputs, rather, an increased frequency of chemical deliveries was expected.

All chemicals for both construction and operations would be transported, used, and disposed of in accordance with existing state and federal regulations and requirements. These regulations and requirements stipulate appropriate vehicles and containers for transport, appropriate storage containers, necessary transfer procedures, worker training, and requirements for disposal. By complying with existing regulations designed to protect human health and welfare, normal construction and operations activities requiring routine transport, use, or disposal of hazardous materials would not pose a significant hazard to the public, and there would be no impact. As a condition of approval, San Bernardino County required CSI, prior to operation of the RFR Project to update its Business Emergency/Contingency Plan.

b) Hazardous materials used during construction, e.g., diesel fuel or hydraulic fluid, could accidentally leak or spill. These materials are regularly handled and should such substances spill, standard construction housekeeping practices would be expected to adequately avoid or minimize effects. Therefore, the potential impact was considered less than significant.

Chemicals or other materials that would be used in operation of or waste streams from Furnace No. 5 were expected to include: mineral-based hydraulic oil, petroleum-based lubricants; and scale. Under operating conditions, chemicals or airborne materials may be released that could expose workers and/or sensitive populations to hazards. The most likely cause of upset conditions during plant operations would be an equipment malfunction. CSI facilities are designed primarily to avoid, and secondarily, to minimize potential for upset conditions. CSI facility design included the following major features:

- redundancy of critical mechanical parts;
- continuous level indicators with alarm systems on all holding tanks, including chemical storage and treatment vessels;
- vacuum breaks at critical junctures to shut-in operations should there be a loss in pressure;
- automated control (dispensing, mixing feedback loops) of chemicals to minimize operator input and the potential for error; and
- the majority of electrical controls for each facility are in a single location, with all controllers connected over a central data highway to a central control panel that graphically displays relevant process information, including alarms, to the operator.

Should an upset condition occur, none of the process chemicals or waste streams associated with the RFR Project had the potential to create a significant hazard. Given the location of the project components away from streams or other natural areas, substantial harm to the environment is not likely. The impact was considered less than significant.

c) No schools are within one-quarter mile of the Project Site, so no impacts on existing or proposed schools were expected to occur.

d) The former Kaiser steel mill site is on the Cortese list, and subject to remediation of site contamination. The characterization phase of the cleanup is ongoing. Construction of the RFR Project would not disturb areas subject to cleanup. In addition, operation of the RFR Project would not occur in a manner that would result in a significant hazard to the public or environment from hazardous substances or wastes, either in combination with existing project area conditions, or independent of these conditions. Less than significant hazard impacts were expected to occur.

e) The Project Site is not subject to an Airport Land Use Plan (ALUP) nor located in the vicinity of a private airstrip, and neither consistency with policies of an ALUP or safety relative to private airstrip operations are germane issues for the site and no impact would occur.

f) Traffic associated with the RFR Project was not expected to impede emergency traffic operations. Construction of the RFR Project improvements would require movement of large equipment and components (for installation) to the Project Site. Movement of oversized loads would require preapproval and permitting by Caltrans, and must occur in accordance with State requirements. Following Caltrans guidance/direction regarding transport of oversized loads was expected to minimize traffic hazards. In addition, using Caltrans approved routes for the transport of hazardous chemicals was expected to minimize traffic hazards to less than significant.

g) The 2002 Final EIR concluded that the conditions for risk from wildfires did not exist at the Project Site and no impact from wildfires was expected due to implementation of the RFR Project.

### 9.3 Impacts Associated with Project Modifications

**9. a). Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?** Less than Significant Impact. The Project modifications expand the CSI facility's ability to manufacture additional quantities of product, including galvanized steel. Implementation of the Project modifications would require additional quantities of some of the materials used in the manufacturing processes, including caustic cleaners (e.g., sodium hydroxide), coatings (e.g., zinc or an aluminum/zinc combination), rust inhibitors (including hexavalent or trivalent chromium), acid bath (e.g., hydrochloric acid), hydraulic oils, and ammonia (for use in the selective catalytic reduction emission control equipment). CSI does not expect to handle or transport new types of chemicals for process inputs, as it currently handles these types of chemicals. Therefore, there would be an increased frequency of chemical deliveries to the facility.

All chemicals for both construction and operations would be transported, used, and disposed of in accordance with existing state and federal regulations and requirements. These regulations and requirements stipulate appropriate vehicles and containers for transport, appropriate storage containers, necessary transfer procedures, worker training, and requirements for disposal. By complying with existing regulations designed to protect human health and welfare, normal construction and operations activities requiring routine transport,

use, or disposal of hazardous materials would not pose a significant hazard to the public, and there would be no impact. As required by existing regulations, CSI will be required to update its Business Emergency/Contingency Plan.

**9. 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?** Less than Significant Impact. Hazardous materials used during construction and operations could accidentally leak or spill, including petroleum fuels, caustic cleaners, coatings, rust inhibitors, acid bath materials, hydraulic oils, and ammonia. These materials are currently regularly handled and should such substances spill, standard construction housekeeping practices would be expected to avoid or minimize effects of the spill. Therefore, the potential impact is considered less than significant.

The project includes a new tank for the storage of aqueous ammonia. Ammonia is a chronic and acutely hazardous material. Exposure to a toxic gas cloud is the potential hazard associated with a release of anhydrous ammonia, thus potentially exposing individuals. Anhydrous ammonia is heavier than air such that when released into the atmosphere, it would form a cloud at ground level rather than be dispersed. For any new construction of air pollution control equipment that utilizes ammonia, such as SCR technology, current SCAQMD policy does not allow the use of ammonia at concentrations greater than 19% in new storage tanks. Since the ammonia tank is being installed to provide ammonia to SCR air pollution control equipment, this policy will apply to the project and aqueous ammonia will be stored in the new 10,500-gallon storage tank and SCR equipment.

The SCAQMD completed a hazard analysis for the storage of ammonia as part of the review of the impacts associated with implementing SCAQMD Rule 1109.1 – NO<sub>x</sub> emission reductions for various facilities. The analysis determined that an ammonia release would not expose sensitive receptors, if the ammonia storage tank is located more than 0.1 mile (approximately 500 feet) away from the property line (SCAQMD, 2021). The new ammonia storage tank at CSI will be located approximately 1,500 feet from the property line. Therefore, the impacts of an accidental release from the storage tank would be expected to remain on-site. Further, the storage tank will have secondary containment (e.g., berm), which would be capable of containing 110 percent of the contents of the storage tank. Any spilled material would be captured within the containment areas and remain on-site.

Ammonia is currently stored and used at the facility for existing emission control equipment. The use and storage of hazardous materials, including ammonia, requires the preparation and approval of a Risk Management Plan (RMP) under the requirements of Section 25535.2 of Chapter 6.95 of the California Health and Safety Code. The RMP for the CSI Facility will be required to be updated for the additional storage of aqueous ammonia. It is expected that additional deliveries of ammonia would occur routinely throughout the year, but no increase in the daily number of deliveries would occur. Based on the above, operation of the Project modifications is not anticipated to result in a significant increase in hazards due to operation of the new equipment at the CSI Facility.

The processing activities under the Project would be similar to activities that are currently being conducted at the CSI facility. In the course of doing business, CSI would continue to use/handle hazardous materials. A number of existing regulations apply to the use, handling, storage, and disposal of hazardous materials. Health and Safety Code §25506 specifically requires all



businesses handling hazardous materials to submit a business emergency response plan to assist local administering agencies in the response to emergency release or threatened release of a hazardous material. This plan is expected to require updating to reflect the changes in operations associated with the Project modifications.

The use of hazardous materials is regulated by Cal/OSHA regulations and procedures, including providing adequate ventilation, using recommended personal protective equipment and clothing, posting appropriate signs and warnings, and providing adequate worker health and safety training. The exposure of employees is regulated by Cal-OSHA in Title 8 of the CCR. Specifically, 8 CCR 5155 establishes permissible exposure levels (PELs) and short-term exposure levels (STELs) for various chemicals. These requirements apply to all employees. The PELs and STELs establish levels below which no adverse health effects are expected. These requirements protect the health and safety of the workers, as well as the nearby population, including sensitive receptors.

Facilities using a minimum amount of hazardous materials are required to prepare detailed contingency plans to minimize the potential impacts of fires, explosion, or spills. In conjunction with the California Office of Emergency Services, local jurisdictions have enacted ordinances that set standards for area and business emergency response plans. These requirements include immediate notification, mitigation of an actual or threatened release of a hazardous material, and evacuation of the emergency area. The program helps prevent accidental releases of hazardous chemicals; improve accident prevention by soliciting participation from industry and the community; require industry to submit a Safety Plan; and conduct audits of the plans and inspections of the industrial plants.

The above regulations provide comprehensive measures to reduce hazards of explosive or otherwise hazardous materials. Continued compliance with these and other federal, state and local regulations and proper operation and maintenance of equipment minimizing the potential impacts of hazardous materials. By complying with existing regulations designed to protect human health and welfare, normal construction and operations activities requiring routine transport, use, or disposal of hazardous materials would not pose a significant hazard to the public, and no significant impacts would be expected.

**9. c). Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?** No Impact. No schools are within one-quarter mile of the CSI facility, so no impacts on existing or proposed schools are expected to occur.

**9. 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?** Less than Significant Impact. The former Kaiser steel mill site, including portions of the Project Site, are on the Cortese list, and subject to remediation of site contamination. The characterization and remediation phases associated with site clean-up activities are ongoing. Construction of the Project modifications would not change the clean-up requirements associated with the former Kaiser steel mill or Project Site. In addition, operation of the Project modifications would not occur in a manner that would result in a significant hazard to the public or environment from hazardous substances or wastes, either in combination with existing project area conditions, or independent of these

conditions. The Project modifications are not expected to result in significant hazards to the public associated with contamination.

**9. e). For a project located within an airport land use plan or, where such a plan has not been adopted, be within two miles of a public airport or public use airport, and result in a safety hazard for people residing or working in the project area?** No Impact. The Project Site is not subject to an Airport Land Use Plan (ALUP) nor located in the vicinity of a private airstrip, and neither consistency with policies of an ALUP or safety relative to private airstrip operations are germane issues for the project. No impact would occur.

**9 f). Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?** No Impact. Construction of the Project modifications would require movement of large equipment and components (for installation) to the Project Site. Movement of oversized loads would require preapproval and permitting by Caltrans, and must occur in accordance with State requirements. Following Caltrans guidance/direction regarding transport of oversized loads assures that trucks use truck routes, avoiding more sensitive areas such as residential areas, thus minimizing traffic hazards. In addition, using Caltrans approved routes for the transport of hazardous chemicals is expected to minimize traffic hazards so that no significant traffic hazards are expected.

The #3 CGL will be built within the existing Plate Mill building and the new PPPL will be located inside an existing building. Therefore, all Project modifications will occur within the confines of the existing Project Site and would not interfere with an adopted emergency response plan or emergency evacuation plan.

**9. g). Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?** No Impact. The CSI facility is located within an urban area that is largely developed. The site and surrounding area is a heavy industrialized area. The Project site is not located in an area of the state that has been identified as having a significant risk of loss due to a wildfire (CalFire, 2022). Therefore, no impacts related to wildfire are expected.

#### **9.4 Conclusions**

Based on the above, the Project modifications would not result in any significant change in the impacts on hazards and hazardous materials, as evaluated in the 2002 Final EIR for the CSI RFR Project, and the Project impacts will remain less than significant. Since no potentially significant adverse impacts to hazards and hazardous materials were identified, no mitigation measures are required and no further evaluation of hazards and hazardous materials impacts are required.

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

***SUBSTANTIATION:***

***San Bernardino County General Plan, 2020; Submitted Project Materials***

**10.1 Environmental Setting**

The Project site lies within the Santa Ana River Watershed basin within the Santa Ana Region. The Santa Ana Region covers approximately 2,800 square miles of land roughly between Los

Angeles and San Diego. The region covers portions of Los Angeles, San Bernardino, Riverside, and Orange counties. The Project site is located within the East Etiwanda Creek-Santa Ana River Watershed, which covers approximately 138,519 acres (approximately 216.4 square miles). All water inputs into this basin are directed toward the Santa Ana River and flow towards the southwest to the Aliso Creek-Santa Ana River Watershed, ultimately discharging into the Pacific Ocean (City of Fontana, 2022).

The Santa Ana Watershed is managed in part by the Santa Ana Watershed Project Authority (SAWPA). The SAWPA consists of five member agencies including Eastern Municipal Water District (EMWD), Inland Empire Utilities Agency (IEUA), Orange County Water District (OCWD), San Bernardino Valley Municipal Water District (SBMWD), and Western Municipal Water District (WMWD). Wastewater treatment outside of the CSI facility is provided by the Inland Empire Utilities Agency (IEUA).

Groundwater in the project area is located in the Chino Basin, which has a surface area of approximately 250 square miles. The Chino Basin Water Conservation District owns and manages 1,433 acre-feet of land for water capture and infiltration. Groundwater is recharged through direct infiltration or precipitation on the subbasin floor, by infiltration of surface flow, and by underflow of groundwater from adjacent basins. The five recharge facilities in the subbasin are Deer Creek, Day Creek, East Etiwanda, San Sevaine, and Victoria.

The operation of steel mills requires substantial water use. Most of the water used in a steel plant is for cooling, descaling, for chemical treatment (e.g., pickling), and dust suppression. The Chino Basin Water Conservation District (CBWCD) provides process water to the Project Site through their existing system. It is currently estimated that over a 24-month average period, operations at CSI - including steel manufacturing and treatment of all wastewater streams - requires importation of approximately 51 million gallons of water per month. CSI has adjudicated water rights from the CBWCD. Process water can also be purchased from the Fontana Water Company.

Since 1994, CSI has operated an industrial wastewater treatment facility to treat wastewater generated from its production facilities. The CSI wastewater treatment facility treats approximately 622 gallons per minute of industrial effluent from the CSI facility. The CSI wastewater treatment facility operates under an industrial wastewater discharge permit issued by the Inland Empire Utilities Agency and County Sanitation Districts of Los Angeles County.

Wastewater treatment outside of the CSI facility is provided by the IEUA, which owns and operates four treatment facilities that specialize in regional water recycling services. The IEUA provides recycling and wastewater services for the cities of Chino, Chino Hills, Fontana, Montclair, Ontario, Upland, and Rancho Cucamonga. The IEUA plants have the capacity to treat approximately 86 million gallons per day of wastewater. The Fontana Water Company receives recycled water resources from IEUA and operates four regional water recycling plants.

The Project Site, is essentially flat. No streams or natural drainages traverse the area. Surface water is collected and discharged to the storm sewer system at the Mulberry Ditch. The ditch originates on the Kaiser Mill Site, trends south to Interstate 10, where it trends in a westerly direction for approximately 800 feet to its confluence with the San Bernardino County Flood Control Department's San Sevaine Channel.

The project area is not located within a 100-year flood hazard area, and no levees or dams exist on the CSI property that retain substantial amounts of water. The Project Site is not located proximate to bodies of water subject to seiche or tsunamis. The CSI site does not contain or is not located near steep terrain and soils conditions subject to mudflows.

## 10.2 Previous Environmental Review<sup>17</sup>

a) Neither construction nor operation of the previously approved RFR Project would include activities that would directly result in violation of a water quality standard, or waste discharge requirements. The Project Site is currently industrialized, and surface runoff is routed to the storm sewer system. The RFR Project was not expected to result in changed land use or site conditions that could affect the quality of either ground or surface water and the project had no direct impact to water quality.

The RFR Project was expected to allow an average 19 percent increase in production; therefore, it was assumed that implementation of the RFR Project would result in a similar increase in waste streams, including wastewater, would occur. The RFR Project was estimated to result in an increase of approximately five million gallons per month (118 gallons per minute) of wastewater. The existing CSI wastewater treatment facility had capacity to treat this water, and to do so within the limits of its current discharge requirements.

b) The RFR Project required the use of additional water for cooling and process water of approximately five million gallons per month, 118 gallons per minute or 169,000 gallons per day). The project-related increase in water demand was supplied by the CBMWD. It was determined that CBMWD could supply the RFR Project and meet its current and projected obligations to serve its customers as planned and the RFR Project would have no impact on water demand.

e), d), e), g), and h). The RFR Project did not require substantial alteration of the generally flat topography of the Project Site. Because the Project Site drains to the storm sewer system, and is either paved or "hard pack," site paving and minor alteration of drainage patterns would have negligible effects on the amount and direction of runoff. Moreover, the Project Site is not located in an area known to flood. The RFR Project would not result in long-term impacts relative to erosion, siltation, flooding, or storm sewer capacity.

i). In addition to the reasons cited above, the RFR Project was not found to be proximate to or have elements that would result in failure of a dam or levee. Therefore, no impact would occur.

j). The RFR Project did not have conditions that would result in a project-related risk of seiche, tsunami, or mudflow. Therefore, no impact would occur.

## 10.3 Impacts Associated with Project Modifications

**10. a). Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?** Less than Significant Impact. The CSI wastewater treatment plant currently treats approximately 660 gallons per minute of industrial effluent from the CSI facility and has a design capacity of 1,200 gpm. The maximum industrial wastewater discharge associated with the Project modifications is estimated to be 55 gpm. Based

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<sup>17</sup> See SB County, 2001, Draft EIR, Appendix A, pages 40-42.

on the above, following implementation of the Project modifications, the total industrial wastewater treated at CSI would be approximately 710 gpm per minute, which is less than the design capacity of the wastewater treatment plant of 1,200 gpm. Therefore, the increase in wastewater associated with the Project modifications could be treated within the existing CSI wastewater treatment plant. The wastewater treatment plant operates under a wastewater discharge permit. Compliance with the requirements of the wastewater discharge permit is expected to minimize the potential for significant impacts on water quality standards and comply with waste discharge requirements. Therefore, less than significant impacts on water quality would be expected.

**10. b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?** Less than Significant Impact.

**10. e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?** Less than Significant Impacts.

The Project modifications are expected to require additional water to operate the equipment. The #3 CGL is estimated to require approximately 792,000 gallons per month or approximately 26,400 gallons per day. The new PPPL is expected to require approximately 1.58 million gallons per month or approximately 52,685 gallons per day. Therefore, the total increase in water use associated with the Project modifications is estimated to be 79,100 gallons per day (approximately 28.5 million gallons per year).

The majority of water used by the CSI facility is from the Chino Basin Water District. The Chino Basin is an adjudicated water basin and was adjudicated under the Chino Basin Judgment, entered on January 27, 1978 by the Superior Court for San Bernardino County. The provisions of the judgment are administered and managed by the Chino Basin Watermaster. The Chino Basin Watermaster manages the water basin and establishes the Safe Yield levels for the Basin, which is recalculated every 10 years. The Safe Yield levels are defined in the Chino Basin Judgment as “the long-term average annual quantity of ground water (excluding replenishment of stored water but including return flow to the Basin from use of replenishment or stored water) which can be produced from the Chino Basin under conditions of a particular year without causing an undesirable result.”

CSI has adjudicated water rights of over 3,000 acre-feet of water per year from the Chino Basin Water District or approximately 1 billion gallons of water per year. However, the amount of water that the Chino Basin Water District has allocated to CSI as the Safe Yield for the long-term protection of the ground water basin is 1,615.1 acre-feet per year or 526 million gallons per year (Chino Basin Watermaster, 2022). CSI currently uses an estimated 458 million gallons of water per year from the Chino Basin Water District. The increase in water associated with the Project modifications would result in an estimated water use of 28.5 million gallons per year for a total water use at CSI of approximately 486.5 million gallons per year. Therefore, CSI has sufficient adjudicated water rights and sufficient water supplies are available from the Chino Basin Water District to safely accommodate the estimated increase in water use from the Project modifications (Chino Basin Watermaster, 2022). Therefore, the increase in water use associated with the Project modifications would result in less than significant impacts on groundwater recharge and management.

See Section 19 – Utilities and Service Systems for the evaluation of the water demand impacts associated with the Project modifications.

**10. c). Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would: i) result in substantial erosion or siltation onsite or offsite; ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; iv) impede or redirect flood flows?** No Impact. The Project modifications do not require alteration of the generally flat topography of the Project Site. The Project modifications are not expected to result in an increase in paved area as the #3 CGL and the new PPPL will be constructed within existing buildings. There would be some minor work to provide foundations for a new storage tank and generator and the existing Plate Mill building would be enlarged by approximately 9,000 square feet; however, this area already contains hardscape. The Project site is not expected to require additional paving or result in alterations of drainage patterns or the amount and direction of runoff in the area. The Project modifications would not result in substantial erosion or siltation, increase stormwater flow, or exceed the capacity of existing stormwater drainage systems.

**10. d). In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?** Less than Significant Impact. The western portion of the Project Site (including the location of the Project modifications) is located within the 500-year flood hazard zone (FP2) with a 0.2 percent annual chance of flood hazard (SB County, 2020d - Flood Hazards, Countywide Plan Policy Map). However, the Project Site is not listed by the County as being in any mapped dam inundation hazard zone and is not downstream of large water bodies or tanks which could cause flooding and inundate the Site. The Project modifications are not expected to result in a change in existing flood hazards at the Project Site as site grading and changes in topography are not expected. The Project Site does not have conditions that would result in a project-related risk of seiche or tsunami because of the project location, and no impacts would be expected to occur.

#### **10.4 Conclusions**

Based on the above, the Project modifications would not result in any significant change in the impacts on hydrology and water quality, as evaluated in the 2002 Final EIR for the CSI RFR Project, and the Project impacts will remain less than significant. Since no potentially significant adverse impacts to hydrology and water quality were identified, no mitigation measures or further evaluation of hydrology and water quality are required.

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant</i>	<i>No Impact</i>
<b>XI. LAND USE AND PLANNING - Would the project:</b>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

***SUBSTANTIATION:***

***San Bernardino County General Plan, 2020; Submitted Project Materials***

**11.1 Environmental Setting**

The CSI facility is located within a heavy industrial area of the County. It is located on a 430-acre parcel in a heavy industrial, unincorporated Fontana area of San Bernardino County, at the northwest corner of San Bernardino and Cherry Avenues, between the cities of Fontana and Rancho Cucamonga (see Figures 5 and 6).

The lead land use agency for the Project modifications is the San Bernardino County Land Use Services Department, Planning Division. The County adopted the Countywide Plan on October 27, 2020 which acts as their General Plan. The land use designation for the Project Site and immediately surrounding parcels is designated by the County as General Industrial and the existing zoning designation is "IR," or Regional Industrial. The purposes of this designation are to identify or establish areas that meet one or more of the following criteria:

- Major industrial centers - 200,000 or more square feet, or more than 500 employees per shift;
- Sites for industrial uses which have severe potential for negative impacts on adjacent uses; and/or,
- Industrial development, which would support the public need for manufacturing uses and employment opportunities.

The development intensity of the Project Site and immediately surrounding parcels is designated by the County as "Improvement Level (IL) 1." An IL 1 property is identified as appropriate for the most dense and highest intensity level of development, with typical lot sizes of more than 0.5 acre. See Table 3 for a detailed description of the existing land use and zoning surrounding the Project Site.

The nearest residential site is located approximately 2,000 feet to the south and east of the project site, and the site is not near or adjacent to an established residential community.



The Project Site and surrounding areas are fully developed. There is no known habitat or natural community conservation plans in the vicinity of the project area.

## 11.2 Previous Environmental Review<sup>18</sup>

a). The environmental review for the RFR Project concluded that conditions do not exist that could result in the project dividing an established community, and no impact would occur.

b). The environmental review for the RFR Project determined that the project would meet the following County locational criteria for an IR designation:

- Full urban services available;
- Located within area of existing industrial activity;
- Physically suited to industrial activity;
- Industrial traffic not routed through residential or other areas not compatible with industrial traffic;
- Residential or long-term agricultural uses inappropriate; and
- Stable soil with average slope of ten percent or less.

The environmental review for the RFR Project determined that the project, in conjunction with the CUP application, did not fundamentally conflict with applicable plans, and no impact would occur.

c). The environmental review for the RFR Project determined that conditions do not exist at the site that could result in the project conflicting with habitat or natural community conservation plans. There would be no impact.

## 11.3 Impacts Associated with Project Modifications

**11. a). Physically divide an established community?** No Impact. The Project modifications would occur at the existing CSI facility which is located on a 430 acre industrial property and which has been used for steel operations since the 1940s. Because the Project modifications would be located within the confines of an existing industrial site, it would not physically divide an established community and no impact would occur.

**11. 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?** No Impact. As with the previous environmental review, the Project modifications would meet the following County locational criteria for an IR designation:

- Full urban services available;
- Located within area of existing industrial activity;
- Physically suited to industrial activity;
- Industrial traffic not routed through residential or other areas not compatible with industrial traffic;

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<sup>18</sup> See SB County, 2001, Draft EIR, Appendix A, pages 42-44.

- Residential or long-term agricultural uses inappropriate; and
- Stable soil with average slope of ten percent or less.

The County has approved the Speedway Commerce Center II Specific Plan Project which would modify the 522-acre existing Auto Club Speedway, immediately north of the Project Site, into a smaller race track, with high-cube logistics and e-commerce development and ancillary commercial uses. The Final EIR for the Speedway Commerce Center concluded that the project would have no significant adverse land use impacts and was consistent with the County's adopted land use plans and ordinances (SB County, 2022).

Based on the above, the Project modifications, in conjunction with the modifications to the existing CUP, will not fundamentally conflict with applicable plans, and no impact would occur.

#### **11.4 Conclusions**

Based on the above, the Project modifications would not result in any significant change in the impacts on land use and planning, as evaluated in the 2002 Final EIR for the CSI RFR Project, and the Project impacts will remain less than significant. Since no potentially significant adverse impacts to land use and planning were identified, no mitigation measures or further evaluation of land use impacts is required.

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant</i>	<i>No Impact</i>
<b>XII. MINERAL RESOURCES - Would the project:</b>				
a) Result in the loss of availability of a known mineral resource that will be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**SUBSTANTIATION:** (Check  if project is located within the Mineral Resource Zone Overlay):  
**San Bernardino County General Plan, 2020; Submitted Project Materials**

**12.1 Environmental Setting**

The Project Site is not located within a Mineral Resource Zone, and therefore is not known to contain mineral resources classified by the State Mining and Geology Board as "Classified" or "Designated." The Project Site has been owned by CSI since 1986, and by Kaiser since the 1940s; neither party is known to have historically utilized the Project Site for mineral production, and the Project Site is not currently utilized for that purpose.

**12.2 Previous Environmental Review**

a) and b). The previous environmental review for the RFR Project indicated that conditions do not exist that could result in the project resulting in the loss of a known mineral resource of local, regional, or state importance.<sup>19</sup> Therefore, the RFR Project had no impact on mineral resources.

**12.3 Impacts Associated with Project Modifications**

**12. 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?** No Impact.

**12. 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?** No Impact.

The Project modifications will occur at the CSI facility which has been used for industrial purposes since the 1940s. The CSI site is not located within a Mineral Resource Zone, and therefore is not known to contain mineral resources classified by the State Mining and Geology Board as "Classified" or "Designated." For the Project modifications, the # 3 CGL and new PPPL facilities will be built within existing buildings. Therefore, the modifications will occur within the footprint of

<sup>19</sup> See SB County, 2001, Draft EIR, Appendix A, page 45.

the existing operations. The Project site is not known to contain mineral resources; therefore, no impacts to mineral resources are expected.

#### **12.4 Conclusion**

Based on the above, the Project modifications would not result in any significant change in the impacts on mineral resources, as evaluated in the 2002 Final EIR for the CSI RFR Project, and the Project impacts will remain less than significant. Since no potentially significant adverse impacts to mineral resources were identified, no mitigation measures or further evaluation of mineral resources is required.

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant</i>	<i>No Impact</i>
<b>XIII. NOISE</b> - Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**SUBSTANTIATION:** (Check if the project is located in the Noise Hazard Overlay District  or is subject to severe noise levels according to the General Plan Noise Element ):

**San Bernardino County General Plan, 2020; Submitted Project Materials**

### 13.1 Environmental Setting

Project Site is not located within a County-identified Noise Hazard Overlay District, and therefore is not located in an area subject to excess noise exposure from aircraft, rail operations, or traffic. The Project Site is located near the 70 decibels (dBA) noise contour for Interstate 10 and adjacent to the 70 dBA noise contour for San Bernardino Avenue.<sup>20</sup>

Current contributors to ambient noise levels at the Project Site are both stationary and mobile, including equipment operations at the CSI manufacturing facility, as well as rail and truck operations associated with the facility. In addition, CSI-generated vehicular and train traffic contributes to noise along area roadways and rail lines.

<sup>20</sup> County of San Bernardino, 2022. Existing and Future Noise Contours. Available at: <https://www.arcgis.com/apps/webappviewer/index.html?id=a10cd5b4d5cf4874a289cf9f5277d648>.

San Bernardino County standards require that locally regulated noise sources not exceed noise levels at the exterior of noise sensitive receptors (residences, schools, libraries, hospitals, nursing homes, and churches) as follows:

- By more than a maximum of 75 dB(A) or an average of 55 dB(A) between 7 a.m. and 10 p.m.; and
- By more than a maximum of 65 dB(A) or an average of 45 dB(A) between 10 p.m. and 7 a.m.

The nearest identified sensitive noise receptor to the Project Site is a small residential area located approximately 2,000 feet to the southeast. The nearest identified non-residential sensitive receptor is the Live Oak Elementary school, located approximately one mile to the north and east.

The CSI facility is located approximately 6.5 miles northeast of Ontario International Airport. The airport nearest to the Project Site (Rialto Municipal) is located approximately 6 miles to the northeast.

### **13.2 Previous Environmental Review<sup>21</sup>**

a). The previous environmental review determined that the RFR Project would increase noise levels at the Project site during construction and operation activities. However, neither construction nor operation of the RFR Project was expected to result in either long- or short-term levels of noise in excess of established standards and noise impacts were considered to be less than significant.

b). The previous environmental review determined that the RFR Project would result in a slight increase in train trips and could result in a minor increase in ground-borne noise and/or possibly vibration near rail lines. However, the impact was considered less than significant.

c). Under normal operating conditions, the noisiest operating equipment associated with the RFR Project was anticipated to be the furnace blowers, which are housed underground within the basement of a building surrounded by the insulating furnace refractory. Because of the insulation, combined with the distance between the source and the property line of the nearest noise-sensitive receptor, noise increases were not expected to exceed County standards, and were not expected to contribute substantially to cumulative noise levels in the area. As a condition of approval, San Bernardino County required project and cumulative facility noise to be maintained at or below County Standards (see above). Therefore, noise impacts were considered to be less than significant.

Operation of the RFR Project was expected to generate approximately 106 semi-truck roundtrips and 98 employee vehicle roundtrips per day. This traffic would be of the same nature that currently utilizes area roadways, and would not noticeably contribute to long-term traffic-generated noise along them. The RFR Project would generate an additional nine train trips per month. Therefore, project-related train traffic would not noticeably contribute to long-term noise increases.

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<sup>21</sup>See SB County, 2001, Draft EIR, Appendix A, pages 46-48.

d). Construction of the RFR Project required the use of an excavator, the noisiest piece of construction equipment, for five to seven consecutive days. This equipment could generate noise levels of 76 maximum and 65 average dB(A) at the Project Site property line. Sound attenuates at a rate of 6 decibels for every doubling of distance from the source, starting at 50 feet. Therefore, it was estimated that short term construction noise would be audible at the closest sensitive receptor (the nearest home located to the south) at approximately 43 maximum and 32 average dB(A).

Construction-related vehicle traffic was expected to access the property utilizing the following routes:

- Cherry Avenue, from 1-10 to San Bernardino Avenue (average daily traffic (ADT) of 20,700).
- Etiwanda Avenue, from 1-10 to San Bernardino Avenue; (ADT of 16,300).
- Fourth Street/San Bernardino Avenue from 1-15 to the project site; (ADT of 20,500).

Construction of the RFR Project was expected to generate an average of approximately 10 miscellaneous truck roundtrips and 120 employee vehicle roundtrips per day on these routes. This would represent a minor short-term increase in traffic over existing conditions. Construction vehicles would be of the same nature as traffic that currently uses Etiwanda, San Bernardino, and Cherry avenues. Construction impacts would not be substantial, and are considered short-term and less than significant.

e) and f). The Project Site is neither within the planning area of an ALUP, nor in the vicinity of a private airstrip. Conditions do not exist for related impacts to occur, and there would be no impact.

### **13.3 Impacts Associated with Project Modifications**

**13. a). Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?** Less than Significant Impact.

#### **Construction Noise**

Construction activities associated with the Project modifications will require the use of heavy construction equipment. The noise levels from typical construction equipment expected to be used are presented in Table 12.

The construction equipment noise sources identified in Table 12 range from 76 decibels (dBA) to 85 dBA for activities. The construction equipment, hours of operations, number of pieces of equipment operating at the same time, and construction phases, would vary depending on the phase of construction. Construction activities would generate noise from heavy construction equipment and construction-related traffic. Construction activities are estimated to generate noise levels of about 82 dBA at 50 feet from the center of construction activity. Most of the construction noise sources would be located within buildings and at or near ground level, which would help attenuate noise levels. The estimated noise from a representative construction site at increasing distances from the site is provided in Table 13.

**TABLE 12**  
**Example of Noise Levels from Construction Noise Sources**

<b>Equipment</b>	<b>Typical Noise Level in Decibels (dBA)<sup>(a)</sup></b>
Air Compressor	80
Backhoe	80
Compactor	82
Concrete Mixer	85
Concrete Pump	82
Concrete Vibrator	76
Crane, Derrick	88
Crane, Mobile	83
Dozer	85
Generator	82
Grader	85
Loader	80
Paver	85
Roller	85
Truck	84

(a) FTA, 2018. Levels are in dBA at 50 feet from the source.

**TABLE 13**  
**Estimated Noise Level Attenuation from Construction Activities**

<b>Distance from Construction Noise Source (feet)</b>	<b>Estimated Noise Level (dBA)</b>
50	82
100	76
200	70
400	64
800	58
1,600	52
3,200	46
4,800	43
6,400	40

Table 13 assumes construction activities of about 82 dBA at 50 feet from the center of construction activity and uses an estimated six dBA reduction for every doubling of distance (divergence). The noise levels are expected to decrease to about 55 dBA at about 1,200 feet from construction activities, which is the approximate location of the boundary of the CSI facility. The potential noise impact of construction activities at the closest residential area (approximately 2,500 feet south of the site) would be 49 dBA. Existing CNELs in this area along San Bernardino Avenue are 65-70 dBA, largely due to traffic on San Bernardino Avenue. Existing CNELs for the residential area south of the Site is 60 dBA (SB County, 2020). Since construction noise levels would not exceed



County standards and would be below existing noise levels, construction noise impacts are expected to be less than significant.

### **Operational Noise**

The major noise-generating equipment associated with the Project modifications includes the new heaters and SCR equipment, the # 3 CGL, and the packed-bed scrubber associated with the PPPL. Estimated noise levels associated with the proposed new equipment is provided in Table 14.

**TABLE 14  
 Estimated Noise Levels from Operational Noise Sources**

<b>Equipment</b>	<b>Typical Noise Level in Decibels (dBA)<sup>(a)</sup></b>	<b>Noise Level Outside of Building (if applicable)</b>
#3 CGL	80-90 <sup>(b)</sup>	60-70 <sup>(c)</sup>
SCR/Heaters	70 <sup>(b)</sup>	65 <sup>(d)</sup>
Generator	82 <sup>(e)</sup>	N/A
PPPL	80 <sup>(b)</sup>	60 <sup>(c)</sup>

- (a) Levels are in dBA at 50 feet from the source.
- (b) Based on manufacturers information and assuming equipment complies with OSHA Limits.
- (c) Equipment for #3 CGL and PPPL are located within buildings. Buildings are estimated to provide a 20 dBA reduction in noise (FTA, 2018).
- (d) The heater/SCRs are outdoors. Due to the location of the equipment the noise estimate assumes a 5 dBA reduction due to the building which provides a barrier to offsite noise sources.
- (e) FTA, 2018.

Based on Table 14, the loudest noise source (outside) would be from the #3 CGL at about 60-70 dBA outside of the building. Table 15 provides the estimated noise attenuation with distance from the noise sources and uses an estimated six dBA reduction for every doubling of distance (divergence). The noise levels are expected to decrease to about 43 dBA at about 1,200 feet from the new facilities, which is the approximate location of the boundary of the CSI facility. The potential noise impact at the closest residential area (approximately 3,400 feet south of the site) would be 34 dBA. Existing CNELs in this area along San Bernardino Avenue are 65-70 dBA, largely due to traffic on San Bernardino Avenue. Existing CNELs for the residential area south of the Site is 60 dBA. Since construction noise levels would not exceed County standards and would be below existing noise levels, operational noise impacts are expected to be less than significant.

**TABLE 15**

**Estimated Noise Level Attenuation from Operational Activities**

<b>Distance from Noise Source (feet)</b>	<b>Estimated Noise Level (dBA)</b>
50	70
100	64
200	58
400	52
800	46
1,600	40
3,200	34
6,400	28

Operation of the Project modifications is not expected to generate rail, truck or employee trips above those that are currently generated. The Project modifications will increase the amount of galvanized product produced but will not increase the total throughput of the facility. The traffic would be of the same nature that currently utilizes area roadways, and would not be noticeably different than current traffic. Therefore, transportation sources are not expected to contribute to the ambient noise environment.

**13. b). Generation of excessive groundborne vibration or groundborne noise levels?** Less than Significant. With respect to vibration, the Project modifications could result in minor earthmoving equipment to prepare the foundation for a new storage tank and generator and the existing Plate Mill building would be enlarged by approximately 9,000 square feet. The use of earthmoving equipment would be limited to a week or so and would not generate vibration outside of the Project Site boundaries because of the distance (approximately 1,000 feet). During operations, the new equipment is not a significant source of vibration. The Project modifications will add a heater, tanks, cooling tower, physical cleaning equipment, and wet-packed bed scrubbers, and these types of equipment do not generate vibration. The pay-off reels that move the steel strip can vibrate themselves; however, they are located above ground and, as such, do not generate groundborne vibration. Further, all new equipment will be located within buildings that are at least 1,000 feet from any other off-site structures. Therefore, the Project modifications are not expected to generate any significant groundborne vibration impacts.

**13. 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 and expose people residing or working in the project area to excessive noise levels?** No Impact. The Project Site is neither within the planning area of an ALUP, nor in the vicinity of a private airstrip. Conditions do not exist for related impacts to occur, and there would be no impact.

**13.4 Conclusion**

Based on the above, the Project modifications would not result in any significant change in the noise impacts, as evaluated in the 2002 Final EIR for the CSI RFR Project, and the Project

impacts will remain less than significant. Since no potentially significant adverse noise impacts were identified, no mitigation measures or further evaluation of noise impacts is required.

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant</i>	<i>No Impact</i>
<b>XIV. POPULATION AND HOUSING - Would the project:</b>				
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 type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

***SUBSTANTIATION:***  
***San Bernardino County General Plan, 2020; San Bernardino Housing Element 2022; Submitted Project Materials.***

#### 14.1 Environmental Setting

Since the 1950s, southern California has expanded outward from downtown Los Angeles to find additional opportunities to house the region’s growing population. In recent decades, the Inland Empire (which includes San Bernardino County) has been one of the fastest growing regions in the nation. Growth in the total county area, including incorporated areas, peaked in the 1990s with a growth rate of nearly 60%. Growth remained strong in recent decades though the rate declined below double digits for the first time between 2010 and 2020. The number of people living in the unincorporated areas has fluctuated over the years and has only increased from about 298,000 in 1970 to around 300,000 in 2020. The total population in San Bernardino County in 2020 was approximately 2.2 million people (San Bernardino County, 2022b).

Future population growth is estimated by the Southern California Association of Government (SCAG) in their 2020-2045 Regional Transportation Plan/sustainable Communities Strategy (RTP/SCS). The SCAG RTP/SCS provides the goals and policies which guide growth within the region including growth projections for the region’s cities and counties, including San Bernardino, Imperial, Los Angeles, Orange, Riverside, and Ventura counties. Per SCAG projections, San Bernardino County is anticipated to increase through 2045 by approximately 29 percent compared to the estimated population of the County in 2021. The population of the County in 2030 is and 2.5 million residents, with an estimated 2.8 million residents in 2045 (SCAG, 2020).

Based on U.S. Census data, in 2022 San Bernardino County was estimated to contain a labor force of 1,054,590 people, of which 988,653 were employed.<sup>22</sup> The total labor force in Southern California is over 8 million people (SCAG, 2020).

In 2020 approximately 12% of households in the County resided in unincorporated communities. In 2020, the unincorporated portion of the County had approximately 98,800 households, while the incorporated cities in the County had over 666,000 households. Between 2020 and 2030, the Southern California Association of Governments (SCAG) projects approximately 5,800 households to be added in unincorporated areas compared to over 80,000 more households in incorporated cities (San Bernardino County, 2022b).

## 14.2 Previous Environmental Review

a). The impact of the RFR Project on population and housing was considered to be less than significant because:

- 50-60 construction personnel would be required for approximately 6 months and were expected to come from the local area.
- Project operation would generate approximately 30 full-time positions which is small and predicted to have no effect on area housing demand.
- Because construction and operation workers would be from the project area, no effect on the area's distribution, density, or rate of growth of human population would occur.

Based on the above, the impact of the RFR Project on population would be de minimis, and no impact would occur.<sup>23</sup>

## 14.3 Impacts Associated with Project Modifications

**14. a). Induce substantial unplanned population growth in an area either directly (e.g., by proposing new homes and businesses) or indirectly (e.g. through extension of roads or other infrastructure)?** No Impacts. Construction activities are expected to require between about 40 to a maximum of 220 construction workers per day over an approximately 1.5 to 2 year period. Because of the substantial population in the County (over one million people) and southern California area (over eight million people), it is assumed that construction personnel would be drawn from the local area. Therefore, no short-term change in population or housing would occur.

The current Project modifications would result in an increase of 50-100 employees at CSI. When added to the current employees, the total number of employees at CSI would be 900-950, which is less than the 1,400 employees analyzed for the RFR Project. Because of the substantial labor force in the southern California area (i.e., over 8 million people), it is assumed that new operational personnel would be drawn from the local population. Therefore, no long-term change in population or impacts on housing demand would be expected. Further, the Project modifications are not expected to impact population distribution, density, or rate of growth of the population of housing as workers are expected to come from the southern California area.

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<sup>22</sup> United States Census Bureau. 2022. American Community Survey. Available at: <https://data.census.gov/table?t=Employment&g=050XX00US06071&tid=ACSST5Y2019.S2405>

<sup>23</sup> See SB County, 2001, Draft EIR, Appendix A, pages 49-50.

**14. b). Displace a substantial number of existing people or housing units, necessitating the construction of replacement housing elsewhere?** No Impacts. The Project modifications will occur within the confines of the existing CSI Facility which does not contain any housing. Therefore, no housing will be displaced and no impacts on housing will occur.

#### **14.4 Conclusions**

Based on the above, the Project modifications would not result in any significant change in the impacts on population and housing, as evaluated in the 2002 Final EIR for the CSI RFR Project, and the project impacts will remain less than significant. Since no potentially significant adverse population or housing impacts were identified, no mitigation measures or further evaluation of population or housing is required.

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant</i>	<i>No Impact</i>
<b>XV. PUBLIC SERVICES</b>				
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"/>	<input type="checkbox"/>
Police Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other Public Facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

***SUBSTANTIATION:***

***San Bernardino County General Plan, 2020; Submitted Project Materials***

**15.1 Environmental Setting**

The Project Site is currently served by the following public services.

- Fire and Emergency Response: The San Bernardino County Fire Protection District provides fire and emergency response services to the Project Site. The nearest fire station is Fontana Station #72, located at 15380 San Bernardino Avenue, Fontana, approximately 1.5 miles east of the Project Site.
- The San Bernardino County Sheriff Department provides police protection services. The closest sheriff station is located at 17780 Arrow Blvd., Fontana, approximately 4.5 miles northeast of the site.
- Several schools are located within two miles of the Project Site including Live Oak Elementary School, Chaparral Elementary School, Almond Elementary School, Sequoia Middle School, Henry Kaiser High School, and Fontana High.
- Parks/Recreation Facilities – Several parks or recreation facilities are located within five miles of the Project Site including Kaiser Park, Veterans Park, Jack Bulik Park and Multi-Purpose Rink, Sycamore Hills Park, Martin Tudor Jurupa Hills Regional Park, Catawba Park, Village Park, Southridge Park, Shadow Park, Chaparral Park, and Oak Park.

## 15.2 Previous Environmental Review

a). The RFR Project was considered to have no impacts on public services for the following reasons.<sup>24</sup>

- Fire/Emergency Response: During construction, hazards would be limited to spills of fuel or hydraulic fluid, which would be immediately contained and treated/removed. Materials used for construction would be standard, non-explosive, and for the most part non-hazardous and non-combustible, and as such are not anticipated to result in an increased need for fire or emergency response services. Further, the fire department will review all project design drawings and provide input oriented toward avoiding upset events that would require fire/emergency response. Based on the above, operation of the RFR Project was not anticipated to result in any impacts on fire and/or emergency response services.
- Police, Schools, and Parks/Recreation: Because construction or operation would not support a large work force, the RFR Project was not anticipated to result in increased demand for or alteration to police, schools, or parks/recreational services. No impact would occur.

## 15.3 Impacts Associated with Project Modifications

**15. 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 following public services: Fire Protection? Police Protection? Schools? Parks? Other public facilities?** Less than Significant Impact. With respect to fire and emergency services, construction activities are not expected to require fire protection services. Hazards would be limited to spills of fuel or hydraulic fluid, which would be contained on-site and treated/removed. Materials used for construction would be standard, non-explosive, and for the most part non-hazardous and non-combustible, and as such are not anticipated to result in an increased need for fire or emergency response services.

The existing CSI facility currently maintains personnel and equipment on-site for fire suppression efforts and posts fire emergency procedures. There are fire hydrants located throughout the facility that provide additional fire water flow in the event of an emergency. The CSI facility will continue to operate needed fire protection services. It is not expected that the Project modifications will require an increase in the level of fire protection service needed to protect and serve the facility because there will be no new flammable materials stored on-site. Prior to operation of the Project modifications, the fire department will review and approve all project design drawings and assure that the modifications meet applicable fire codes. Compliance with State and local fire codes is expected to minimize the need for additional fire protection services.

Further, the use and storage of hazardous materials requires the preparation and approval of a Risk Management Plan under the requirements of Section 25535.2 of Chapter 6.95 of the

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<sup>24</sup>See SB County, 2001, Draft EIR, Appendix A, page 53.



California Health and Safety Code. A RMP is expected to be required for the additional storage of aqueous ammonia. In addition, on-site fire-fighting equipment is maintained for immediate response in the event of fires. Based on the above, operation of the Project modifications is expected to result in less than significant impacts on fire and/or emergency response services.

Entry and exit at the CSI facility is currently monitored and no additional or altered police protection is expected. The CSI facility has a 24-hour security force for people and property currently in place. The Project modifications will occur within the confines of the existing CSI facility which already has security measures in place. Therefore, no significant impacts to the local police department are expected related to the project modifications.

The Project modifications would result in an increase of 50-100 employees at CSI. When added to the current employees, the total number of employees at CSI would be 900-950, which is less than the 1,400 employees analyzed for the RFR Project. Because of the substantial labor force in the southern California area (i.e., over 8 million people), it is assumed that new operational personnel would be drawn from the local population. An increase of 50-100 employees would not result in the need for new schools or parks/recreational facilities or other public facilities. Therefore, no significant long-term impacts on schools, parks/recreational facilities or other public facilities are expected.

#### **15.4 Conclusions**

Based on the above, the Project modifications would not result in any significant change in the impacts on public services, as evaluated in the 2002 Final EIR for the CSI RFR Project, and the Project impacts will remain less than significant. Since no potentially significant adverse public services impacts were identified, no mitigation measures or further evaluation of public services is required.

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant</i>	<i>No Impact</i>
<b>XVI. RECREATION</b>				
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 will occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

***SUBSTANTIATION:***

***San Bernardino County General Plan, 2020; Submitted Project Materials***

**16.1 Environmental Setting**

As discussed above, several parks or recreation facilities are located within five miles of the Project Site including Kaiser Park, Veterans Park, Jack Bulik Park and Multi-Purpose Rink, Sycamore Hills Park, Martin Tudor Jurupa Hills Regional Park, Catawba Park, Village Park, Southridge Park, Shadow Park, Chaparral Park, and Oak Park.

**16.2 Previous Environmental Review<sup>25</sup>**

Neither construction nor operation of the RFR Project required a large work force that could generate increased demand for recreational facilities. The Project did not include or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. For these reasons, the RFR Project was found to have no impact on recreational resources without mitigation.

**16.3 Impacts Associated with Project Modifications**

**16. a) 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?** No Impact.

**16. b). Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?** No Impact. The Project modifications are expected to result in a construction workforce of up to 220

<sup>25</sup>See SB County, 2001, Draft EIR, Appendix A, pages 52-53.

workers and an increase of 50-100 new operational employees. Because of the substantial labor force in the southern California area (over 8 million people), it is assumed that construction workers and new operational personnel would be drawn from the greater southern California area. Construction workers are temporary and not expected to result in an increase in population in the San Bernardino area. An increase of 50-100 permanent employees would not result in the need for new parks/recreational facilities. Therefore, no long-term impacts on recreational facilities are expected.

#### **16.4 Conclusions**

Based on the above, the Project modifications would not result in any significant change in the impacts on recreational facilities, as evaluated in the 2002 Final EIR for the CSI RFR Project, and the Project impacts will remain less than significant. Since no potentially significant adverse recreation impacts were identified, no mitigation measures or further evaluation of recreation is required.

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant</i>	<i>No Impact</i>
<b>XVII. TRANSPORTATION – Would the project:</b>				
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"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

***SUBSTANTIATION:***

***San Bernardino County General Plan, 2020; Submitted Project Materials***

**17.1 Environmental Setting**

The CSI facility is located on the north side of San Bernardino Avenue, between Cherry and Etiwanda Avenues. The main access to the site is via the main gate on Cherry Avenue and California Steel Way. Rail tracks access the Project Site from the southwest or northeast corner of the former Kaiser steel mill property.

Logical access routes to the Project Site from area freeways include Cherry Avenue from I-10; Etiwanda Avenue to San Bernardino Avenue from I-10; and 4th Street/San Bernardino Avenue from I-15.

The CSI facility is serviced by several interstate highways and state routes, primarily the following:

- Interstate 10 (I-10). I-10 runs east-west starting in the city of Ontario on the western edge of the County, continues east and ends at the eastern edge of the County near the city of Yucaipa. The highway provides direct access to Los Angeles to the west, as well as to Palm Springs and surrounding cities/towns to the east.
- Interstate 15 (I-15). The most extensive stretch of interstate highway in San Bernardino County is I-15. Access is provided starting in the densely populated southwestern edge of the County and ends at the Nevada border near the town of Primm, Nevada. The highway

runs through the San Gabriel Mountains into the high desert region through major population centers of Victorville, Hesperia, Apple Valley, Barstow, etc. It runs north-south from the southwestern to the northeastern edge of the County lines.

- Interstate 215 (I-215). I-215 begins at the southern tip of the city of San Bernardino and runs north-south to connect to I-15 on the north side of the city of San Bernardino at the base of the San Gabriel Mountains. I-215 provides convenient access to downtown San Bernardino as well as California State University, San Bernardino, and Glen Helen Regional Park at the northern end of the highway.

Under SB 743, as of July 1, 2020, auto delay (traffic congestion) can no longer be used as the criteria for transportation analysis under CEQA. Automobile traffic impacts have historically been analyzed with Level of Service (LOS) methodologies based on roadway capacity metrics (volume/capacity). LOS has been replaced with vehicle miles traveled or VMT. The County has developed significance thresholds and methodology to comply with SB 743.

As part of the Program EIR for the Countywide Plan, the County estimated VMT per resident and per employee using the San Bernardino Transportation Analysis Model. Based on this model, the household VMT (home-based-work plus home-based-other trip purposes) were estimated to be 20.5 VMT per person (in 2016) for the unincorporated portions of the county on average. The employment VMT in 2016 (home-based-work trips) were estimated to be 24.3 VMT per employee for the unincorporated portions of the county on average (SB County, 2020). The CSI facility was operational at the time that SB 743 took effect so the County VMT estimates include the operations of the CSI facility as part of its baseline.

## 17.2 Previous Environmental Review<sup>26</sup>

Construction of the RFR Project was expected to generate approximately 130 vehicle round trips per day to the site for about 6 months. The anticipated amount of construction traffic represented a small increase in average daily trips over the expected transportation routes, which was considered to be negligible, and the short-term construction impacts on traffic were considered less than significant.

Operation of the RFR Project would require transport of personnel on a daily basis and materials on an intermittent basis. Assuming overall throughput and operations would increase by approximately 19 percent, operation was expected to generate an average of 204 new vehicle trips per day to the site – 98 personnel transport vehicle trips and 106 transport truck trips. The anticipated amount of traffic represented an average maximum increase over ADTs along Cherry Avenue and 4th Street/San Bernardino Avenue, or Etiwanda Avenue of 1.0 to 1.25 percent, respectively. The amount of construction or operation traffic was considered minor, and its effect on intersection operations were considered less than significant.

The RFR Project did not contain project elements, such as roadways, that could result in design hazards. The RFR Project expanded industrial uses, and did not create hazards due to incompatibility with other area traffic or transportation uses/modes. No impact was expected. Further, the RFR Project was not expected to affect emergency access and no impact was expected.

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<sup>26</sup> See SB County, 2001, Draft EIR, Appendix A, pages 54-57.

### 17.3 Impacts Associated with Project Modifications

**17. a). Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?** Less than Significant Impact.

**17. b). Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3 subdivision (b)?** Less than Significant Impact. The Project modifications are expected to result in a construction workforce of up to 220 workers and an increase of 50-100 new operational employees.

CEQA analysis for determining potential significant transportation impacts from vehicle trips transitioned from an automobile delay or capacity measure to a Vehicle Miles Traveled (VMT) of automobiles and light trucks metric in July 2020, as required by Senate Bill (SB) 743. VMT is an area-wide performance measure which helps compare the overall performance of a project or project alternatives and is also used as a metric to ultimately assess the transportation environmental impacts of a project. VMT analysis shifts the focus towards impacts caused by the distance traveled by vehicles rather than the localized congestion created by vehicles (i.e., intersection-level delay). VMT is generally calculated using a travel demand model that captures the movement of all trips over a highway network. Analysis is limited to automobile travel (automobiles and light-trucks) and excludes heavy trucks.

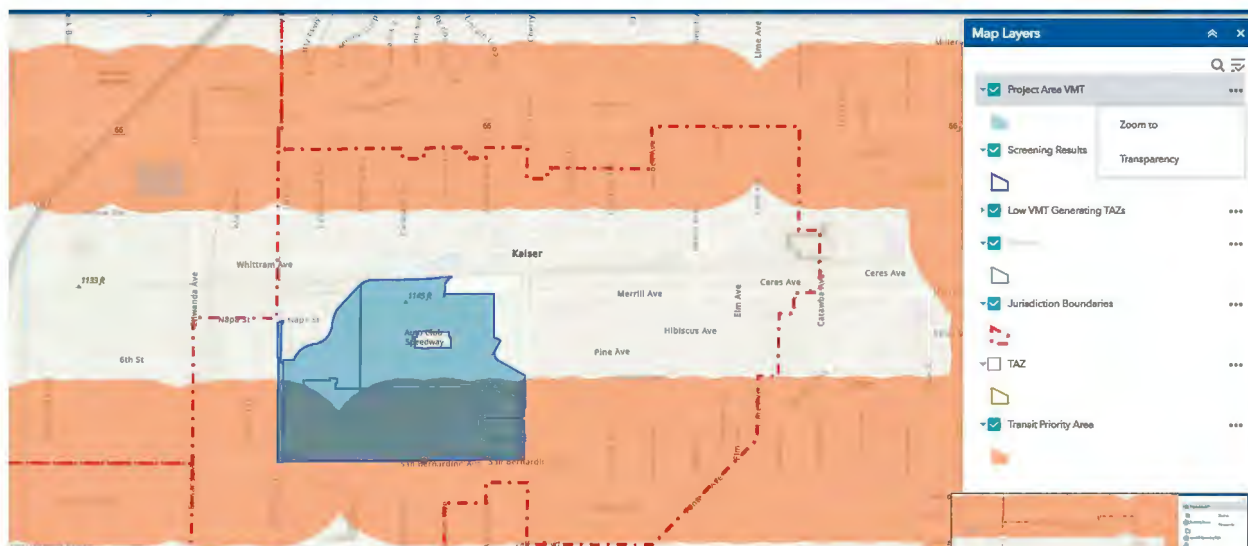
San Bernardino County prepared Recommended Transportation Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (SBCTA, 2020) that provide technical guidance regarding assessment of VMT, thresholds of significance, and mitigation measures for land development and transportation projects in the unincorporated area (SBCTA, 2020).

San Bernardino County also produced a web-based VMT Screening Tool that can be used to determine whether or not prospective projects meet local thresholds requiring thorough VMT analysis (available at: <https://www.gosbcta.com/plan/san-bernardino-transportation-analysis-model/>). The SBCTA Guidelines establish “Projects located within a TPA may be presumed to have a less than significant impact absent substantial evidence to the contrary”, where a “TPA is defined as a half mile area around an existing major transit stop or an existing stop along a high quality transit corridor.”<sup>27</sup> As shown in Figure 8, the Screening Tool shows that the Project Site is located in a Transit Priority Area and therefore, no further VMT analysis is necessary.

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<sup>27</sup> SCBTA, 2020. Page 25.

**Figure 8. SBCTA VMT Screening Tool Results**



Neither the County's Transportation Analysis Guidelines nor the State Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA require that transportation or VMT analyses be calculated for trucks or construction activities associated with a project. Because of the substantial population in the southern California area, it is assumed that construction workers and new operational personnel would be drawn from the greater southern California area. Construction workers are temporary and not expected to result in an increase in population or a permanent increase in VMT in the San Bernardino area.

The current Project modifications would result in an increase of 50-100 employees when added to the current employees, the total employee would be 900-950, which is less than the 1,400 employees analyzed for the RFR Project (the number of employees is half the automobile daily one-way trips presented in Table 2 ( $2,801/2 = 1,400$ )). Therefore, no increase in vehicle trips from employees over what was previously analyzed is expected. Additionally, based on the County's VMT Screening Tool no further VMT analysis is needed as the project is within a Transit Priority Area and, therefore, would be considered less than significant. Further, the current Project modifications are not expected to result in an increase in truck or rail traffic greater than the previously evaluated project. Therefore, the transportation impacts are expected to be less than significant.

**17. c). Substantially increase hazards due to a geometric design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?** No Impact.

**17. d). Result in inadequate emergency access?** No Impact. The Project modifications will occur within the confines of the existing CSI facility and does not contain project elements that would result in increased roadway hazards. Further, the Project modifications are not expected to affect emergency access as they will occur within the existing facility boundaries. Therefore, no impact is expected.

#### **17.4 Conclusions**

Based on the above, the Project modifications would not result in any significant change in the impacts on transportation, as evaluated in the 2002 Final EIR for the CSI RFR Project, and the Project impacts will remain less than significant. Since no potentially significant adverse transportation impacts were identified, no mitigation measures or further evaluation of public services is required.



<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant</i>	<i>No Impact</i>
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**XVIII. TRIBAL CULTURAL RESOURCES**

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

***SUBSTANTIATION:***

***San Bernardino County General Plan, 2020; Cultural Historical Resources Information System (CHRIS), South Central Coast Information Center, California State University, Fullerton; Submitted Project Materials***

The State CEQA Guidelines were amended in July 2015 to include evaluation of impacts on tribal cultural resources. Tribal cultural resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe (Public Resources Code 21074). Assembly Bill (AB) 52 specifies that a project that may cause a substantial adverse change to a Tribal Cultural Resource (TCR) may result in a significant effect on the environment. AB52 requires tribes interested in development projects within a traditionally and culturally affiliated geographic area to notify a lead agency of such interest and to request notification of future projects subject to CEQA prior to determining if a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. The lead agency is then required to notify the tribe within 14 days of deeming a development application subject to CEQA complete to notify the requesting tribe as an invitation to consult on the project.

**18.1 Environmental Setting**

The State CEQA Guidelines were amended in July 2015 to include evaluation of impacts on tribal cultural resources, and the CEQA Checklist has been amended since the RFR Project EIR was prepared to specifically include tribal cultural resources.

A California Historical Resources Information System (CHRIS) records search was conducted at the South Central Coastal Information Center at Cal State Fullerton on three separate occasions as part of the review of the San Bernardino Countywide Plan EIR. The records search showed that the County is home to a robust and varied suite of cultural resources, from prehistoric campsites and rock art to historic infrastructure and buildings. Multiple places considered sacred to local indigenous groups are also present in the County. Tribal cultural resources are more prevalent in the East and North Desert Regions, but the Mountain Region contains both prehistoric and historic resources. Tribal cultural resources are numerous in the Mountain Region, which also has landscape features considered sacred by multiple Native American groups, because this region provided a variety of resources for Native Americans in the summer months.

A number of Sacred Lands have also been identified by the Native American Heritage Commission (NAHC) in the San Bernardino area. Native American groups with NAHC-listed sacred lands in the County include:

- Chemehuevi Indian Reservation
- Gabrieleno Band of Mission Indians–Kizh Nation
- Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Kern Valley Indian Community
- Morongo Band of Mission Indians
- Pechanga Cultural Resource Facility
- San Manuel Band of Mission Indians
- Serrano Nation of Mission Indians

The Project Site has been used as a steel mill since the 1940's and associated with the former Kaiser steel mill, which is a County Point of Historical Interest as an example of area industrialization. Therefore, the Project site has been used for heavy industrial purposes for decades.

## **18.2 Previous Environmental Review**

The CEQA Checklist has changed since the completion of the previous environmental review. Tribal cultural resources were not directly evaluated as part of the RFR CEQA document. Cultural resources were evaluated and are discussed in 5 b.) above. The previous environmental review concluded that the Project Site was located in the Santa Ana River Valley, in an area identified as having low potential for prehistoric archaeological resources, and not known to contain historic or archaeological resources as defined in Section 15064.5 of the CEQA Guidelines.

## **18.3 Impacts Associated with Project Modifications**

**18. a). Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?** No Impact. The State CEQA Guidelines were amended in July 2015 to include evaluation of impacts on tribal cultural resources, and the CEQA Checklist has been amended since the December 2013 Final MND was prepared to specifically include tribal cultural resources. Tribal cultural resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe (Public Resources Code 21074). Assembly Bill (AB) 52 specifies that a project that may cause a substantial adverse change to a Tribal Cultural Resource (TCR) may result in a significant effect on the environment. AB52 requires tribes interested in development projects within a traditionally and culturally affiliated geographic area to notify a lead agency of such interest and to request notification of future projects subject to CEQA prior to determining if a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. The lead agency is then required to notify the tribe within 14 days of deeming a development application subject to CEQA complete to notify the requesting tribe as an invitation to consult on the project. AB52 identifies examples of mitigation measures that will avoid or minimize impacts to a TCR and applies to projects that have a notice of preparation or a notice of intent to adopt a negative declaration/mitigated negative declaration circulated on or after July 1, 2015.

The County Planning Department sent notices out to all tribes that have requested notification under the requirements of Public Resources Code Section 21080.3.1 regarding the potential project modifications to the CSI Facility. Two tribes request consultation, The Morongo Band of Mission Indians and the Gabrieleno Band of Mission Indians – Kizh Nation. One tribe, Yuhaaviatam of San Manuel Nation (formerly known as the San Manuel Band of Mission Indians) responded indicating that the project area is within Serrano ancestral territory and is of interest to the Tribe (see Appendix D) The three tribes, The Morongo Band of Mission Indians, the Gabrieleno Band of Mission Indians, Kizh Nation, and the Yuhaaviatam of San Manuel Nation have provided several permit conditions that should be imposed on the Project, in the unlikely event that historic, cultural or tribal cultural resources are encountered, which are outlined below.

#### Yuhaaviatam of San Manuel Nation

1. In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and an archaeologist meeting the Secretary of Interior's professional qualification standards in archaeology shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, as detailed within Permit Condition No. 5, regarding any pre-contact and/or historic-era finds and be

provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.

2. If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to YSMN for review and comment, as detailed within Permit Condition No. 5. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.
3. If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.
4. The Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, as detailed in Permit Condition No. 1, of any pre-contact and/or historic-era cultural resources discovered during project implementation and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a cultural resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with YSMN, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents YSMN for the remainder of the project, should YSMN elect to place a monitor on-site.
5. Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to YSMN. The Lead Agency and/or applicant shall, in good faith, consult with YSMN throughout the life of the project.

#### Morongo Band of Mission Indians

1. Prior to the issuance of grading permits, the applicant shall enter into a Tribal Monitoring Agreement with the Morongo Band of Mission Indians for the project. The Tribal Monitor(s) shall be on-site during all ground-disturbing activities (including, but not limited to, clearing, grubbing, tree and bush removal, grading, trenching, fence post placement and removal, construction excavation, excavation for all utility and irrigation lines, and landscaping phases of any kind). The Tribal Monitor(s) shall have the authority to temporarily divert, redirect, or halt the ground-disturbing activities to allow identification, evaluation, and potential recovery of cultural resources and/or tribal cultural resources.
2. Prior to any ground-disturbing activities (including, but not limited to, clearing, grubbing, tree and bush removal, grading, trenching, fence post replacement and removal, construction excavation, excavation for all utility and irrigation lines, and landscaping phases of any kind), and prior to the issuance of grading permits, the Applicant shall retain a qualified archaeologist who meets the U.S. Secretary of the Interior Standards (SOI). The archaeologist shall be present during all ground-disturbing activities to identify any known or suspected archaeological and/or cultural resources. The archaeologist will conduct a Cultural Resource Sensitivity Training, in conjunction with the Tribe[s] Tribal Historic Preservation Officer (THPO), and/or

designated Tribal Representative. The training session will focus on the archaeological and tribal cultural resources that may be encountered during ground-disturbing activities as well as the procedures to be followed in such an event.

3. Prior to any ground-disturbing activities the project archaeologist shall develop a Cultural Resource Management Plan (CRMP) and/or Archaeological Monitoring and Treatment Plan (AMTP) to address the details, timing, and responsibilities of all archaeological and cultural resource activities that occur on the project site. This Plan shall be written in consultation with the consulting Tribe[s] and shall include the following: approved Mitigation Measures (MM)/Conditions of Approval (COA), contact information for all pertinent parties, parties' responsibilities, procedures for each MM or COA, and an overview of the project schedule.
4. The retained qualified archeologist and Consulting Tribe[s] representative shall attend the pre-grade meeting with the grading contractors to explain and coordinate the requirements of the monitoring plan.
5. During all ground-disturbing activities the qualified archaeologist and the Tribal Monitor(s) shall be on-site full-time. The frequency of inspections shall depend on the rate of excavation, the materials excavated, and any discoveries of Tribal Cultural Resources as defined in California Public Resources Code Section 21074. Archaeological and Native American monitoring will be discontinued when the depth of grading and the soil conditions no longer retain the potential to contain cultural deposits. The qualified archaeologist, in consultation with the Tribal Monitor(s), shall be responsible for determining the duration and frequency of monitoring.
6. In the event that previously unidentified cultural resources are unearthed during construction, the qualified archaeologist and the Tribal Monitor(s) shall have the authority to temporarily divert and/or temporarily halt ground-disturbance operations in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates any clearly non-significant deposits shall be minimally documented in the field and collected so the monitored grading can proceed.

If a potentially significant cultural resource(s) is discovered work shall stop within a 60-foot perimeter of the discovery and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. All work shall be diverted away from the vicinity of the find, so that the find can be evaluated by the qualified archaeologist and Tribal Monitor(s). The archaeologist shall notify the Lead Agency and consulting Tribe(s) of said discovery. The qualified archaeologist, in consultation with the Lead Agency, the consulting Tribe(s) and the Native American monitor, shall determine the significance of the discovered resource by recommendation for the treatment and disposition of the Tribal Cultural Resource shall be made by the qualified archaeologist in consultation with the Tribe(s) and the Native American monitor(s) and be submitted to the Lead Agency for review and approval. Below are the possible treatments and dispositions of significant cultural resources in order of CEQA preference:

- A. Full avoidance
- B. If avoidance is not feasible, preservation in place.
- C. If preservation in place is not feasible all items shall be reburied in an area away from any future impacts and reside in a permanent conservation easement or deed restriction.
- D. If all other options are proven to be infeasible, data recovery through excavation and then curation in a Curation Facility that meets Federal Curation standards (36

CFR 79)

7. The Morongo Band of Mission Indians requests the following specific conditions to be imposed in order to protect Native American human remains and/or cremations. **No photographs are to be taken except by the coroner, with written approval by the consulting Tribe(s).**
  - A. Should human remains and/or cremations be encountered on the surface or during any and all ground- disturbing activities (i.e., clearing, grubbing, tree and bush removal, grading, trenching, fence post placement and removal, construction excavation, excavation for all water supply, electrical, and irrigation lines, and landscaping phases of any kind), work in the immediate vicinity of the discovery shall immediately stop within a 100-foot perimeter of the discovery. The area shall be protected by the establishment of an ESA with a marked boundary. Project personnel/observers will be restricted from entry into the ESA. The County Coroner is to be contacted within 24 hours of discovery. The County Coroner has 48 hours to make his/her determination pursuant to State and Safety Code §7050.5. and Public Resources Code (PRC) § 5097.98.
  - B. In the event that the human remains and/or cremations are identified as Native American, the Coroner shall notify the Native American Heritage Commission within 24 hours of determination pursuant to subdivision (c) of HSC §7050.5.
  - C. The Native American Heritage Commission shall immediately notify the person or persons it believes to be the Most Likely Descendant (MLD). The MLD has 48 hours, upon being granted access to the Project site, to inspect the site of discovery and make his/her recommendation for final treatment and disposition, with appropriate dignity, of the remains and all associated grave goods pursuant to PRC §5097.98
  - D. If the Morongo Band of Mission Indians has been named the Most Likely Descendant (MLD), the Tribe may wish to rebury the human remains and/or cremation and sacred items in their place of discovery with no further disturbance where they will reside in perpetuity. The place(s) of reburial will not be disclosed by any party and is exempt from the California Public Records Act (California Government Code § 6254[r]). Reburial location of human remains and/or cremations will be determined by the Tribe's Most Likely Descendant (MLD), the landowner, and the City Planning Department.
8. The final report(s) created as a part of the Project (AMTP, isolate records, site records, survey reports, testing reports, etc.) shall be submitted to the Lead Agency and Consulting Tribe(s) for review and comment. After approval of all parties, the final reports are to be submitted to the appropriate Information Center (IC), and the Consulting Tribe(s).

Gabrieleno Band of Mission Indians, Kizh Nation

1. The Project applicant/ lead agency shall retain a Native American monitor from or approved by the Gabrieleno Band of Mission Indians- Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e. both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground- Disturbing Activity" shall include, but is not limited to, demolition pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling and trenching.

- A. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commence of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.
  - B. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc. (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/ lead agency upon written request to the Tribe.
  - C. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future planned construction activity and/or development construction phase at the project site possesses the potential to impact Kizh TCRs.
2. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e. not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assess by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.
  3. Native American human remains are defined in PRC 5097.98(d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.
  4. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.
  5. Human remains and grave/burial goods shall be treated alike per California Public Resources Code Section 5097.98(d)(1) and (2).
  6. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any discovery of human remains/ burial goods shall be kept confidential to prevent further disturbance.

#### SUMMARIZE CONSULTATION WITH MORONGO AND GABRIELENO TRIBES.

The Project Site and surrounding area is not located within a Cultural or Paleontological Resources Overlay. The Project Site is located in the Santa Ana River Valley, in an area identified as having low potential for prehistoric archaeological resources. The Project modifications would occur at a site that has been used for industrial activities since the 1940's. Further, the modifications would occur within the location of existing buildings. Therefore, the Project modifications are not expected to impact any tribal cultural resources.

As discussed in Section 5 - Cultural Resources above, the buildings associated with the Project modifications are basic industrial buildings that do not contain the features that would be considered historically significant and are not listed or eligible for listing in the California Register of Historical Resources. Therefore, no significant impacts to historic resources would

occur. The Project Site and surrounding areas are not known to contain historic or archaeological resources as defined in Section 15064.5 of the CEQA Guidelines.

#### **18.4 Conclusions**

Based on the above, the Project modifications would not result in any significant change in tribal cultural historic resources as none are known to be located in the vicinity of the Project Site. Since no potentially significant adverse impacts to tribal cultural resources have been identified, no mitigation measures or further evaluation is required. Several permit conditions have been



imposed on the Project, in the unlikely event that historic, cultural or tribal cultural resources are encountered.

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant</i>	<i>No Impact</i>
<b>XIX. UTILITIES AND SERVICE SYSTEMS - Would the project:</b>				
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"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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"/>	<input type="checkbox"/>
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

***SUBSTANTIATION:***

***County of San Bernardino General Plan 2020; Submitted Project Materials***

**19.1 Environmental Setting**

Water service for the Project Site is provided by well water from the Chino Basin Municipal Water District as well as Fontana Water Company (FWC). The Chino Basin spans 235 square miles of the upper Santa Ana River watershed and is one of the largest groundwater basins in southern California. The Chino Basin contains approximately 5 million acre-feet of water with approximately 1 million acre-feet of unused storage capacity. The FWC service area includes the majority of the City of Fontana (City), and portions of the cities of Rialto and Rancho Cucamonga.

Since 1994, CSI has operated an industrial wastewater treatment facility to treat wastewater generated from steel mill operations. The CSI wastewater treatment facility treats approximately 660 gallons per minute of industrial effluent from the CSI facility. The total design treatment capacity is 1,200 gpm. The CSI wastewater treatment facility operates under an industrial wastewater discharge permit issued by the Inland Empire Utilities Agency and County Sanitation Districts of Los Angeles County. In order to discharge the treated water into the IEUA Non-Reclaimable Water System, the pH of the rinse water has to be adjusted and the metal content has to be reduced by precipitation and gravity separation.

Wastewater treatment outside of the CSI facility is provided by the IEUA, which owns and operations four treatment facilities that specialize in regional water recycling services. The IEUA provides recycling and wastewater services for the cities of Chino, Chino Hills, Fontana, Montclair, Ontario, Upland, and Rancho Cucamonga. The IEUA plants have the capacity to treat approximately 86 million gallons per day of wastewater. The Fontana Water Company receives recycled water resources from IEUA and operates four regional water recycling plants.

The Project Site is essentially flat and largely paved. No streams or natural drainages traverse the area. Water runoff is generated during storm events, which is collected and discharged to the CSI storm sewer system and then to the San Bernardino County Flood Control Department's Channel.

Solid waste services within the County are managed by the San Bernardino County Solid Waste Management Division (SWMD). The SWMD management region includes five landfills and nine waste transfer stations. Garbage pick-up and disposal services throughout the County are handled through franchise agreements with waste disposal companies. The Project Site is in the Valley Region of the County, which contains two landfills: the Mid-Valley Sanitary Landfill in the City of Rialto and the San Timoteo Sanitary Landfill in the City of Redlands. Mid-Valley Landfill has a maximum permitted daily throughput of 7,500 tons and San Timoteo Landfill has a maximum permitted daily throughput of 2,000 tons. The total remaining capacity of the Mid-Valley and San Timoteo Landfills are 61,219,377 and 12,360,396 cubic yards, respectively.<sup>28</sup>

## 19.2 Previous Environmental Review

Items a) through g). Neither construction nor operation of the RFR Project improvements were anticipated to result in a substantial impact related to the public utilities and service systems as discussed below.<sup>29</sup>

- Sanitary sewer: For operations, the facility would provide treatment at their existing wastewater treatment facility south of San Bernardino Avenue. No new service extensions were required, and the existing wastewater treatment facility had sufficient capacity to serve the RFR Project without modifications. The impact was considered less than significant.
- Industrial wastewater disposal: The RFR Project would not discharge additional industrial effluent to the CBMWD non-reclaimable wastewater system. Due to the estimated average

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<sup>28</sup>Calrecycle: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1880?siteID=2662>;  
<https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1906?siteID=2688>

<sup>29</sup> See SB County, 2001, Draft EIR, Appendix A, pages 58-60.

19 percent increase in throughput capacity, the RFR Project in combination with other CSI facilities was expected to generate approximately five million gallons per month, or an average of 118 gallons per minute (GPM), of industrial effluent. This amount of wastewater could be accommodated at existing wastewater treatment facilities without modification or expansion, so impacts were considered less than significant.

- Storm sewer: Surface runoff would be diverted to the CSI storm sewer system, as was the existing practice at the time. Because no new area of impervious cover would result from the RFR Project, the quantity of runoff was expected to remain the same, and it was anticipated that no modification of the storm water system would be required to accommodate construction or operation of the RFR Project and there would be no impact.
- Water: For construction drinking water and for dust suppression, CSI would obtain water from the Chino Basin Municipal Water District. For operations, CBMWD indicated it had sufficient supplies to serve the Project Site and no new service or other modifications would be required. The impact was considered less than significant.
- Solid waste disposal: The Mid-Valley (Fontana Sanitary) Landfill, a Class III facility, would accept solid waste from the facility. The RFR Project was not expected to generate additional measurable quantities of solid waste for disposal to a municipal landfill. The impact was considered less than significant.
- Electricity: Electricity for the RFR Project was provided by Southern California Edison Company. No extensions were required as the Project Site was served by electric power of the appropriate voltage to operate the improvements.
- Natural Gas: In order to fuel the boiler for operations, the Southern California Gas Company would provide a meter set and an approximately 200-foot, two-inch natural gas service to the site from an existing 8-inch high pressure main located along the northern right-of-way of San Bernardino Avenue. No extension or alteration of transmission systems was required to provide this service extension.
- Communications: Telephone service would be provided by Pacific Bell from an existing service on CSI property.

The RFR Project impacts on utilities and service systems were considered to be less than significant.

### **19.3 Impacts Associated with Project Modifications**

**19. 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 of which could cause significant environmental effects?. Less than Significant Impacts.**

**19. b). Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? Less than Significant Impacts.**

**19. 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?** Less than Significant Impacts.

**19. 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?** Less than Significant Impacts.

**19. e). Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?** Less than Significant Impacts. The impacts of the Project modifications on utilities and service systems are addressed below.

- Water: The Project modifications are expected to require additional water to operate the equipment. The # 3 CGL is estimated to require approximately 792,000 gallons per month or approximately 26,400 gallons per day. The new PPPL is expected to require approximately 1.58 million gallons per month or approximately 52,685 gallons per day. Therefore, the total increase in water use associated with the Project modifications is estimated to be 79,100 gallons per day.

Significant water demand impacts may occur if the existing water supply does not have the capacity to meet the increased demands of the project, or the project would use more than 262,820 gallons per day of potable water.<sup>30</sup> Since the estimated increase in water use associated with the Project modifications would be 79,100 gallons per day, the increase in water use would be less than the CEQA significance criteria of 262,820 gallons per day. The water use when combined with the RFR Project would still be less than the significance threshold. (169,000 + 79,100 = 248,100 gallons per day).

Further, CSI has adjudicated water rights of over 3,000 acre-feet of water per year, with a safe allocation of 1,615.1 acre-feet per year (526 million gallons per year) from the Chino Basin Water District (Chino Basin Watermaster 2022). CSI currently uses an estimated 458 million gallons of water per year from the CBWD. The increase in water associated with the Project modifications is an increase in water use of 28.5 million gallons per year. The increase in water from the Project modifications combined with the existing water use

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<sup>30</sup>CEQA Guidelines §15155(a)(1)(C) defines a water-demand project as: "A commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space." To estimate the water demand per person relative to the square footage (sf) of the floor area of the plant, commercial water usage rates and average employment levels (i.e. the number of employees per square foot) can be applied as follows:"

$$\frac{(123 \text{ GAL WATER})}{(\text{YEAR}) (\text{SF OF BUILDING})} \times \frac{(1,000 \text{ SF OF BUILDING})}{(1.8 \text{ EMPLOYEES})} \times \frac{(1 \text{ YEAR})}{(260 \text{ DAYS})} \times (1,000 \text{ EMPLOYEES}) = 262,820 \text{ GAL/DAY}$$

This water demand estimate can then be applied to industrial sources because CEQA Guidelines §15155 (a)(1)(E) uses the same 1,000 employee level to defines a water-demand project as: "An industrial, manufacturing, or processing plant or industrial park planned to house more than 1,000 persons, occupying more than 40 acre of land, or having more than 650,000 square feet of floor area." Because the potable water demand calculation based on 1,000 employees is more in line with industrial applications, the current potable water demand significance threshold for industrial projects is 262,820 gallons per day or rounded up to 263,000 gallons per day.

from the CSI facility results in a total water use for CSI of approximately 486.5 million gallons per year. Therefore, CSI has sufficient adjudicated water rights and sufficient water supplies are available from the Chino Basin Water District to safely accommodate the estimated increase in water use from the Project modifications (79,100 gallons per day) (Chino Basin Watermaster, 2022). Further, the increase in water from the Project modifications combined with the water from the RFR Project is below the significance threshold of 262,820 gallons per day. Therefore, the increase in water use associated with the Project modifications is less than significant.

- **Wastewater:** The CSI wastewater treatment plant current treats approximately 660 gallons per minute of industrial effluent from the CSI facility and has a design capacity of 1,200 gpm. The maximum industrial wastewater discharge associated with the Project modifications is estimated to be 55 gpm. Based on the above, following implementation of the Project modifications, the total industrial wastewater treated at CSI would be approximately 710 gpm per minute, which is less than the design capacity of the wastewater treatment plant of 1,200 gpm. Therefore, the increase in wastewater would be less than significant.
- **Stormwater Discharge:** Surface runoff would continue to be diverted to the CSI storm sewer system. The #3 CGL and the new PPPL will be built inside existing buildings. Because no new area of impervious surfaces would result from the Project modifications, the quantity of runoff is expected to remain the same, and no modification of the storm water system would be required to accommodate construction or operation of the Project modifications and there would be no impact.
- **Electric Power:** See Section 6 - Energy. The Project modifications are expected to result in less than significant impacts to electric power companies.
- **Natural Gas:** See Section 6 - Energy. The Project modifications are expected to result in less than significant impacts to natural gas demand.
- **Telecommunications:** Telephone and internet service would not be impacted or changed by the Project modifications and no impact is expected.
- **Solid Waste:** The Project modifications are not expected to result in an increase in solid waste generated by the facility. Therefore, the project would not generated solid waste in excess of the capacity of local infrastructure or otherwise impair attainment of solid waste reduction goals. Further, the CSI facility would continue to comply with federal state and local solid waste management and reduction statues and regulations.

#### **19.4 Conclusions**

Based on the above, the Project modifications would not result in any significant change in the impacts on utilities and service systems services, as evaluated in the 2002 Final EIR for the CSI Reheat Furnace Replacement Project, and the project impacts will remain less than significant. Since no potentially significant adverse impacts on utilities and service systems were identified, no mitigation measures or further evaluation of utilities and service impacts is required.

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant</i>	<i>No Impact</i>
<b>XX. WILDFIRE:</b> 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 type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<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 resources, 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 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 type="checkbox"/>	<input checked="" type="checkbox"/>

***SUBSTANTIATION:***

***County of San Bernardino General Plan 2020; Submitted Project Materials***

**20.1 Existing Setting**

Fire hazard severity is grouped into three zones in State Responsibility Area (SRA): Moderate, High, and Very High. As discussed in Section 9 – Hazards and Hazardous Materials, the CSI Facility is located within an urban area that is largely developed. The site and surrounding area is a heavy industrialized area. The Project Site is not located in an area of the state that has been identified as having a significant risk of loss due to a wildfire (CalFire, 2022).

**20.2 Previous Environmental Review**

In the 2002 Final EIR for the RFR Project, the potential impacts of wildfires were addressed in Section 9 – Hazards and Hazardous Materials. The 2002 Final EIR concluded that the conditions for risk from wildfires did not exist at the Project Site and no impact from wildfires was expected due to implementation of the RFR Project.

### 20.3 Impacts Associated with Project Modifications

As discussed above, the Project Site and surrounding areas are located in heavy industrialized and urbanized areas. The Project Site is not located in an area of the state that has been identified as having a moderate, high or very high fire hazard severity. Most of these areas are located near wildlands, e.g., the foothill and mountain areas. As such, the Project Site is not located in an area with a significant risk of loss due to a wildfire (CalFire, 2022).

**20. a) Substantially impair an adopted emergency response plan or emergency evaluation plan?** No Impact. The Project modifications will be located within the confines of the existing CSI facility. As such, it would not impair an adopted emergency response plan or emergency evacuation plan.

**20. 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?** No Impact. As discussed above, the Project Site has a generally flat topography and is not located within or near a moderate or high fire hazard area. The closest wildfire risks areas are located approximately 7 miles north of the CSI facility, in the foothills of the San Bernardino mountains. The Project modifications would not exacerbate wildfire risks or expose project occupants to pollutant concentrations from wildfire or from the uncontrolled spread of wildfire as the Project Site is not near a wildfire hazard area.

**20. 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?** No Impact. The CSI facility is located in a heavy industrial and urbanized area with a flat topography. The existing Project Site is currently serviced by roads, the County Fire Department, emergency water, and so forth. Therefore, the Project modifications would not require the installation or maintenance of fire protection-related infrastructure.

**20. 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?** No Impact. The CSI facility is located in a heavy industrial and urbanized area with a flat topography. The Project Site is not located in a fire hazard area and, as such, would not expose people or structures to significant risk, including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability of changes in drainage.

### 20.4 Conclusions

Based on the above, the Project modifications would not result in any significant change in the wildfire impacts or risk, as evaluated in the 2002 Final EIR for the CSI Reheat Furnace Replacement Project, and the project impacts will remain less than significant. Since no potentially significant adverse wildfire impacts or risk were identified, no mitigation measures or further evaluation of wildfire is required.



<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant</i>	<i>No Impact</i>
<b>XXI. MANDATORY FINDINGS OF SIGNIFICANCE:</b>				
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 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"/>	<input type="checkbox"/>
c) Does the project have environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**21. 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?** No Impact. Based on the responses to the environmental checklist, it can be seen that the Project modifications do not have the potential to adversely affect the environment, reduce or eliminate any plant or animal species or destroy prehistoric records of the past (see Sections 4 and 5). The CSI facility and the Project modifications are located at a site that is part of an existing industrial facility and has been an industrial facility since the 1940's. Further, the site has been previously disturbed, graded and developed, so the Project modifications will not extend into environmentally sensitive areas, but will remain within the confines of an existing, operating steel mill. For additional information, see Section 4.0 – Biological Resources and Section 5.0 – Cultural Resources.

**21. 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).** Less than Significant Impact. All potential impacts have been thoroughly evaluated and have been deemed to be neither individually significant nor cumulatively considerable in terms of any adverse effects upon the region, the local community or its inhabitants. The Project modifications are not expected to generate adverse impacts to any environmental topic areas evaluated herein. The Project modifications include stationary emission sources that are a source of air emissions. However, because of the requirements to use BACT plus provide emission offsets, the Project modifications, in combination with the previous project, will result in less than significant impacts. Therefore, no significant adverse air quality impacts are expected, either individually or cumulatively. As a result, impacts from the CSI Project are not considered to be cumulatively considerable (CEQA Guidelines §15064 (h)). Therefore, the Project modifications in combination with the previously approved CSI project is not expected to result in significant adverse cumulative impacts pursuant to CEQA Guidelines §15130(a)(2).

**21. c). Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?** No Impact. All potential impacts have been thoroughly evaluated and have been deemed to be neither individually significant nor cumulatively considerable in terms of any adverse effects upon the region, the local community or its inhabitants. At a minimum, the project will be required to meet the conditions of approval for the project to be implemented. It is anticipated that all such conditions of approval will further insure that no potential for adverse impacts will be introduced by construction activities, initial or future land uses authorized by the project approval.

## **REFERENCES**

Ashworth Leininger Group (ALG), (2024). CSI, Number 3 Continuous Galvanizing Line and Push Pull Pickle Line, Air Quality and Greenhouse Gas Analysis, March 2024

ALG, 2024a. CSI Air Quality Modeling and Health Risk Assessment Report, Calendar Year 2023, March 2024.

California Department of Transportation (Caltrans), 2023. California Scenic Highway Mapping System. Accessed 8/28/2023.  
<https://www.arcgis.com/apps/mapviewer/index.html?layers=f0259b1ad0fe4093a5604c9b838a486a>

CalFire, 2022. SRA FHSZ Rollout Application for California. Accessed August 30, 2023. Available at: <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=fd937aba2b044c3484a642ae03c35677>

Chino Basin Watermaster, 2022. Approved 2022/2023 Assessment Package (Production Year 2021/2022). November 17, 2022. Available at: <https://www.cbwm.org/docs/financdocs/All%20Assessment%20Packages/2022-23%20Assessment%20Package.pdf>.

Duke CRM, 2023. Cultural Resources Record Search for the California Steele Industries Project Unincorporated San Bernardino County, November 13, 2023

Environmental Audit, Inc. 2024. California Steel Industries, Inc. RFR Modifications Project Construction Emissions Analysis, March 2024.

Federal Transit Administration (FTA), 2018. Transit Noise and vibration Impact Assessment Manual. September 2018.  
[https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf)

SB County, 2001. Draft Environmental Impact Report for the CSI Reheat Furnace Replacement Project. February, 2001. State Clearinghouse No. 2000071073.

SB County, 2002. Final Environmental Impact Report for the CSI Reheat Furnace Replacement Project. February, 2002. State Clearinghouse No. 2000071073.

SB County, 2022. Draft Environmental Impact Report, Speedway Commerce Center II, Specific Plan Project. SCH No. 2021120259. Available at: <https://maps.kimley-horn.com/portal/apps/storymaps/stories/3f77c5d346a941dca99ab276d799d095>

San Bernardino County, 2022. Housing Element. Available at: [http://www.sbcounty.gov/Uploads/LUS/HousingPlans/HousingElement\\_CWP\\_TechReport\\_Draft\\_2022\\_May\\_trackedchanges.pdf](http://www.sbcounty.gov/Uploads/LUS/HousingPlans/HousingElement_CWP_TechReport_Draft_2022_May_trackedchanges.pdf)

SB County, 2020. Final Program EIR for the San Bernardino Countywide Plan, State Clearinghouse No. 2017101033, August 2020. Available at: <https://countywideplan.com/resources/document-download/>

SB County, 2020b. Earthquake Fault Zone Map, Countywide Plan Policy Map (October, 2020). Available at: <https://www.arcgis.com/apps/webappviewer/index.html?id=d88e2db7ee5649478d70e95c56b0d62d>

SB County, 2020c. Liquefaction & Landslides Policy Map (October, 2020). Available at: <https://www.arcgis.com/apps/webappviewer/index.html?id=5864a434814c4e53adc74101b34b1905>

SB County, 2020d. Flood Hazards Map. Available at: <https://countywideplan.com/resources/maps-tables-figures/>

San Bernardino County Transportation Authority (SBCTA), 2020. Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment, February 2020. Available at: <https://www.gosbcta.com/wp-content/uploads/2021/12/Sample-TIA-Guidelines.pdf>.

Southern California Association of Governments, 2020. Current Context Demographics and Growth Forecast, SCAG Technical Report, September 1, 2020. Available at: [https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial\\_demographics-and-growth-forecast.pdf?1606001579](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579).

South Coast Air Quality Management District (SCAQMD, 2023). 2023 Ambient Air Quality in the South Coast Air Quality Management District. Available at: <https://www.aqmd.gov/docs/default-source/air-quality/historical-data-by-year/2023-air-quality-data-tables.pdf?sfvrsn=6>

South Coast Air Quality Management District 2022. 2022 Air Quality Management Plan. Available at: <https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan#>

SCAQMD, 2021. Final Subsequent Environmental Assessment for Proposed Rule 1109.1. October 2021. Available at: https://www.aqmd.gov/docs/default-source/ceqa/documents/aqmd-projects/2021/pr-1109-1-final-sea-(v10272021).pdf?sfvrsn=6