

**ENVIRONMENTAL ASSESSMENT
FOR
MESSAGE BOARDS LEASE AND USE ON THE
SHERMAN INDIAN HIGH SCHOOL GROUNDS
RIVERSIDE, CALIFORNIA**

Prepared for:

United States Bureau of Indian Affairs

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1849 C Street, N.W.
Washington, D.C. 20240

United States Bureau of Indian Education

1849 C Street NW
Mailstop 4657 MIB
Washington D.C., 20240

Sherman Indian High School

9010 Magnolia Ave.
Riverside, CA 92503

Prepared by:

Lilburn Corporation

1905 Business Center Drive
San Bernardino, CA 92408

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1.0 PURPOSE AND NEED FOR THE PROPOSED ACTION

Lamar Central Outdoor, LLC (“Lamar”) is proposing to enter into a Lease Agreement to erect, maintain, operate, repair, and replace outdoor advertising structures (or message boards) at four sites (or Premises) within the property of the Sherman Indian High School (SIHS) located in Riverside, California. The SIHS is an off-reservation high school for Native Americans that serves students in grades 9 – 12. As an off-reservation high school, SIHS is not located on federally-designated Trust lands, but on federal property managed by the U.S. Bureau of Indian Affairs (BIA) within the U.S. Department of the Interior (DOI). The Bureau of Indian Education (BIE) operates the SIHS on behalf of the BIA. As stated in Title 25 CFR Part 32.3, The BIE’s mission is to provide quality educational opportunities from early childhood through life, in accordance with a tribe’s need for cultural and economic well-being. SIHS is one of only two schools operated by the BIE in the State of California. Implementation of the Proposed Action requires the authorization of a 25-year lease agreement by and between the BIE (the lessor) and Lamar (the lessee). Funds derived from the lease will provide additional monies to further educational opportunities at SIHS.

The **Need for the Proposed Action** is to provide additional funding for the SIHS and its students. Congress has declared that the Federal government has the sole responsibility for the operation and financial support of the BIA funded school system that it has established on or near Indian reservations and Indian trust lands throughout the nation for Indian children. It is the policy of the United States to fulfill the federal government’s unique and continuing trust relationship with, and responsibility to, the Indian people for the education of Indian children and for the operation of financial support of the BIA funded school system to ensure education of the highest quality and to provide for the basic elementary and secondary educational needs of Indian children. However, due to ongoing budgetary constraints, federal funds allocated to the SIHS are insufficient to provide funding for a number of essential school programs, as well as facility development and maintenance. The BIE and the SIHS desire to lease the Premises for the construction and operation of the message boards to Lamar to receive the economic benefits for the operation of the SIHS and to provide ongoing and additional education opportunities for the SIHS students. Lamar will pay the BIE a guaranteed minimal annual rent and 20% of the gross message board revenues that exceed the guaranteed minimal annual rent.

The Proposed Action requires compliance with regulations of the *National Environmental Policy Act* of 1969 (NEPA), the Council of Environmental Quality (CEQ, 40 CFR 1500-1508), and the DOI NEPA (43 CFR Part 46). Therefore, an Environmental Assessment (EA) for the Proposed Action is necessary to analyze the direct, indirect, and cumulative impacts of the BIE’s approval of the Proposed Action. The EA preparation followed guidance within the “Indian Affairs NEPA Guidebook (59IAM 3-H) prepared by the DOI, BIA Division of Environmental and Cultural Resources Management, August 2012.

Pursuant to PUB. Law 112-74, and PUB. Law 113-235, the Director of the BIE or the Director’s designee, is authorized to enter into agreements with public and private persons and entities that provide for such persons and entities to lease land or facilities of a Bureau-operated school for such periods of time as the school is Bureau-operated, in exchange for monetary consideration that benefits the school, as determined by the head of the school. On June 21, 2016, the

Department of the Interior BIE published draft regulations in the Federal Register implementing these laws. Proposed new 25 CFR Part 48 establishes standards for the appropriate use of lands and facilities under a lease agreement. The Proposed Action is the lease of property on Federal lands to allow the installation of three message boards along the southeastern property boundary that fronts SR-91 and one near the property's northwest corner.

2.0 PROPOSED ACTION AND ALTERNATIVES

2.1 PROPOSED ACTION

This document analyzes the potential impacts of a specific Proposed Action – the lease of a portion of SIHS for the construction, maintenance, operation and repair of static and light emitting diodes (LED) digital message boards on the SHIS property in Riverside, California (refer to Figure 1: Regional Location and Figure 2: Project Location). A total of four advertising structures are proposed: three double-sided “V” shaped message boards including underground utility service Access will by way of an existing raodlocated along the southeastern boundary of the school property fronting the Riverside Freeway (SR-91). A fourth smaller three-sided board with underground utility service will be placed on the northwest corner of the property at the Jackson Street and Magnolia Avenue intersection (refer to Figure 2).

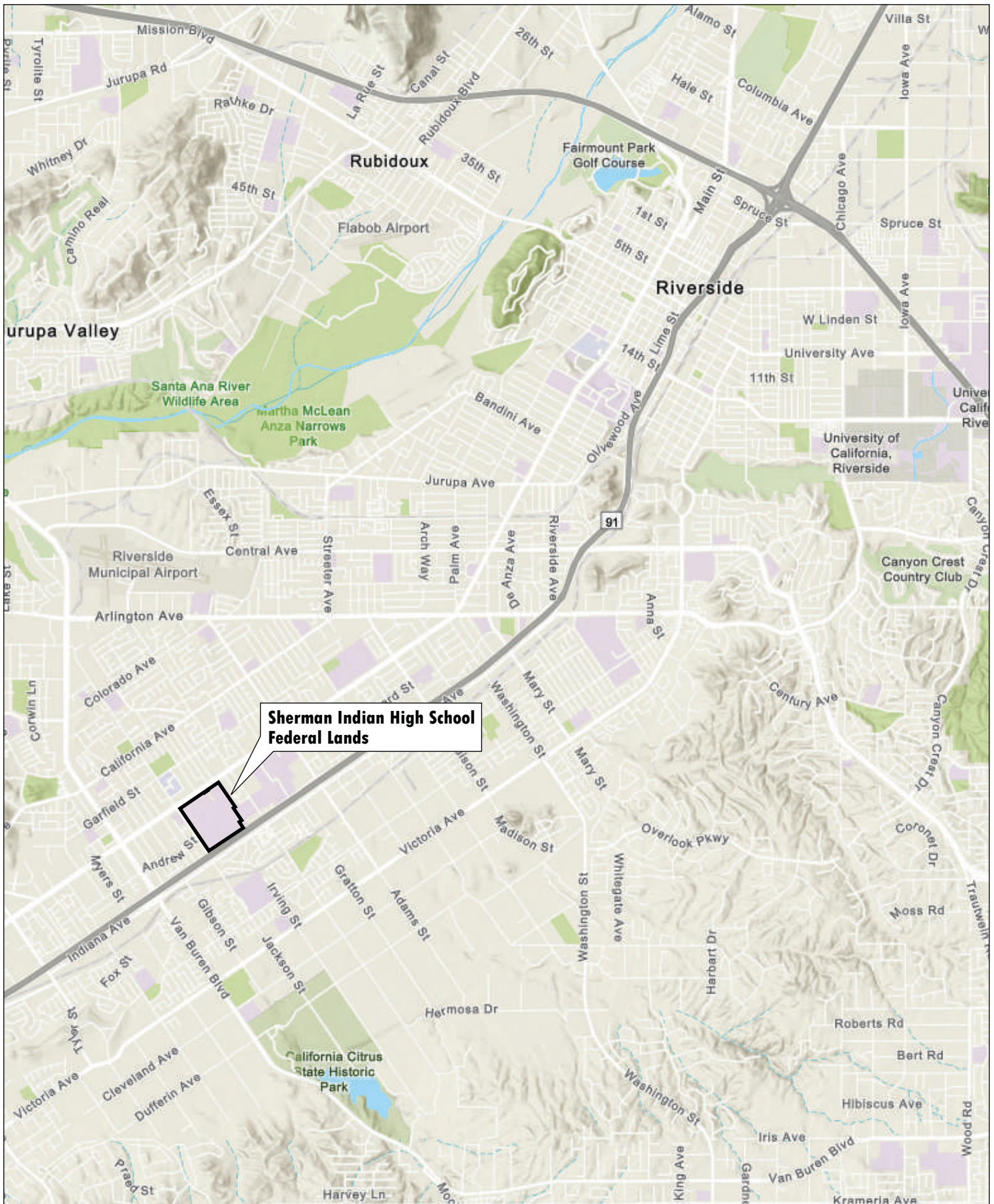
The specific location of the message board sites fronting SR-91 are described as follows:

Site A

Site A is located near the southwest corner of the school property, approximately 282 feet from the western site boundary (see Figure 3). The “V” shaped message board would be placed on the north side of an existing perimeter access road that parallels SR-91. Site A is located south of the track field in a vacant area of the school property. The west facing board will be static and the east facing board will be digital.

Site B

Site B is located approximately 500 feet east of Site A, along the southeastern boundary of the school property (see Figure 3). The proposed “V” shaped message board would be located on the north side of an existing perimeter access road that parallels SR-91 outside of a fenced baseball field. The west facing board will be digital and the east facing board will be static.



REGIONAL LOCATION

*Sherman Indian High School - Lamar Advertising EA
City of Riverside, California*



MILE

Source: Lilburn Corp., July, 2016.

LILBURN
CORPORATION

FIGURE 1



PROJECT VICINITY

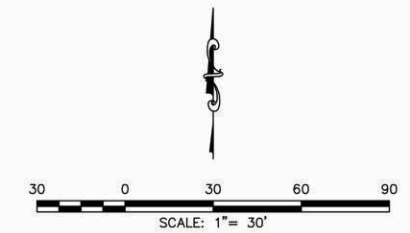
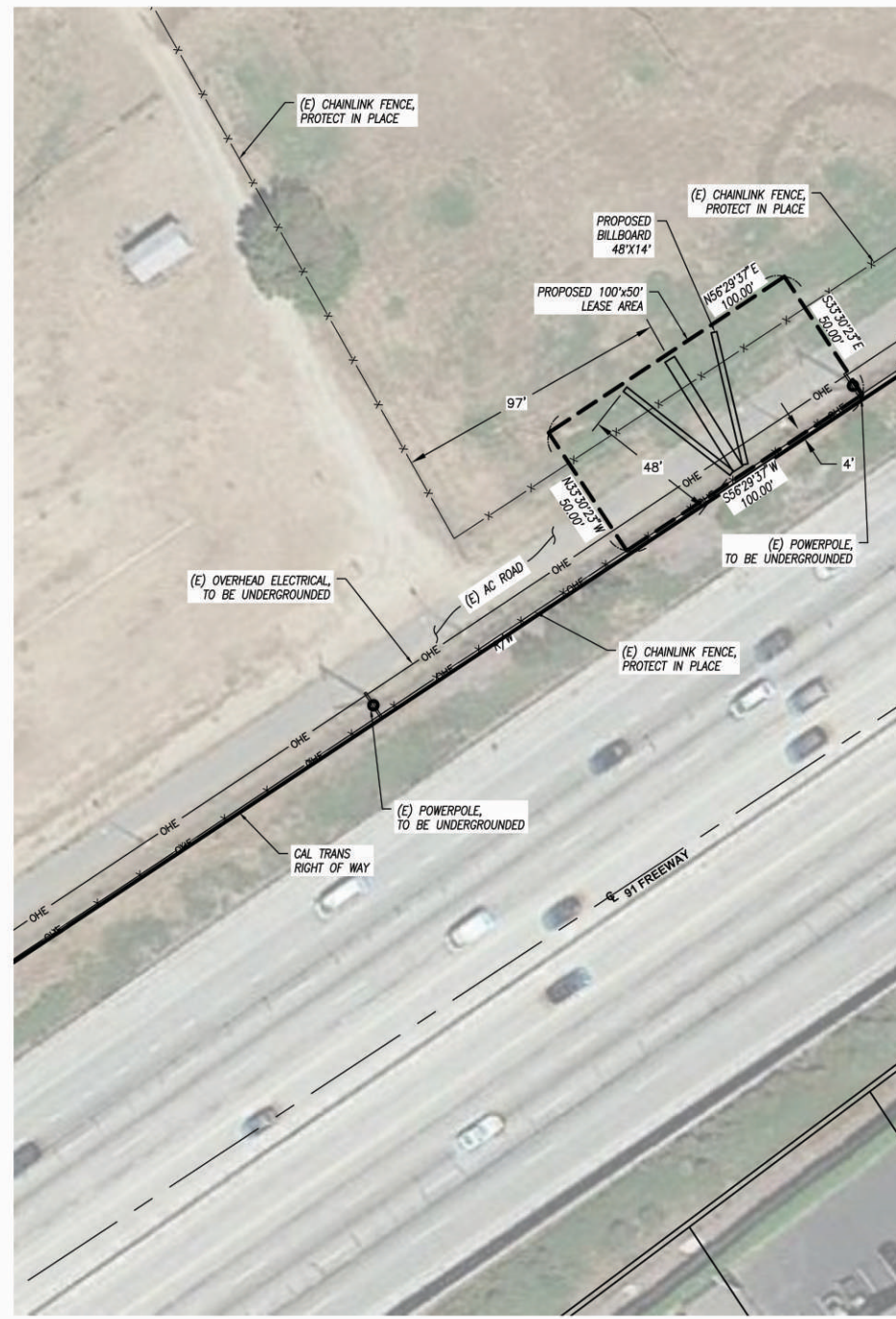
*Sherman Indian High School - Lamar Advertising EA
City of Riverside, California*



Source: Lilburn Corp., July, 2016.

LILBURN
CORPORATION

FIGURE 2



LEGEND

- (E) EXISTING
- AC ASPHALTIC CONCRETE SURFACE
- CL CENTER LINE
- FF FINISH FLOOR
- FL FINISH GRADE
- TC TOP OF CURB
- PP POWER POLE
- GW GUY WIRE
- WM WATER METER
- EXISTING CONCRETE SURFACE
- EXISTING SANDBOX
- RIGHT OF WAY
- PROPERTY LINE
- CENTERLINE
- OVERHEAD ELECTRIC
- EXISTING BLOCK OR STONE WALL
- FLOWLINE

Source: Joseph E. Bonadiman Associates, 11/2015.

SITE A
1" = 30'

SITE B
1" = 30'

PROJECT SITES A and B

Sherman Indian High School - Lamar Advertising EA
City of Riverside, California

Site C

Site C is located approximately 500 feet east of Site B, along the southeastern boundary of the school near the school property southeast corner (see Figure 4). The proposed “V” shaped message board would be located on the north side of an existing perimeter access road that parallels SR-91 outside of a fenced baseball field. The west facing board will be static and the east facing board will be digital.

Site D

One three-sided message board is proposed on the southeast corner of Jackson Street and Magnolia Avenue (see Figure 4). The board would be located approximately 40 feet from the Jackson Street property line and 40 feet from the Magnolia Avenue property line and will replace three existing SIHS wood and metal message boards. The message board at this location would be a three-sided board structure with three 17-foot by x 17-foot board faces mounted on 10-foot high pole in an encasement similar to those proposed to front SR-91. The face pointing north towards the intersection will be digital and the other two sides will be static boards.

Construction Activities

All construction activities shall follow lease stipulations, best management practices with respect to dust control and storm water, standard safety procedures to eliminate access to the construction sites, and any conditions added by the BIE or outlined in this document. It is expected that the construction of each structure will take approximately five working days. Construction activities associated with Sites A-C will include removing the existing power line and poles, trenching to underground the power utilities, drilling for the pole placement, construction of the board itself, and final grading and landscaping. Each of the above activities would take approximately one to two day per site. Equipment would include a trencher, crane, drill rig, and a loader or back hoe. Trucks would deliver equipment and the structures to the site. All construction will be coordinated with SIHS to ensure the safety of SIHS employees and students.

Message Board Descriptions

The proposed message boards on the southeastern boundary of school property will be 48 feet wide by 14 feet high and mounted on a 20-foot tall pole with an overall height of 34 feet. A 5-foot wide by 4-foot deep pole encasement with the SIHS colors and logo per their design will encase each pole (see Figure 5). One static board and one LED digital message board in a “V” shape are proposed at each site along the Riverside Freeway. An existing above-ground power line with poles along the SR-91 frontage road will be removed and undergrounded to power the billboards. Trenching will be needed to bury the power lines between the pole locations. Two potential power sources have been identified; the preferred source is a transformer located on the

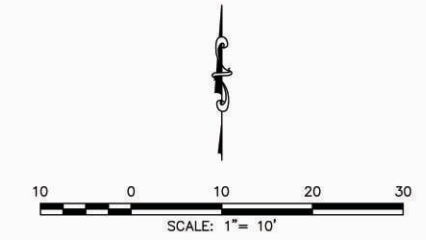


Source: Joseph E. Bonadiman Associates, 11/2015.

SITE C
1" = 30'



SITE D
1" = 30'

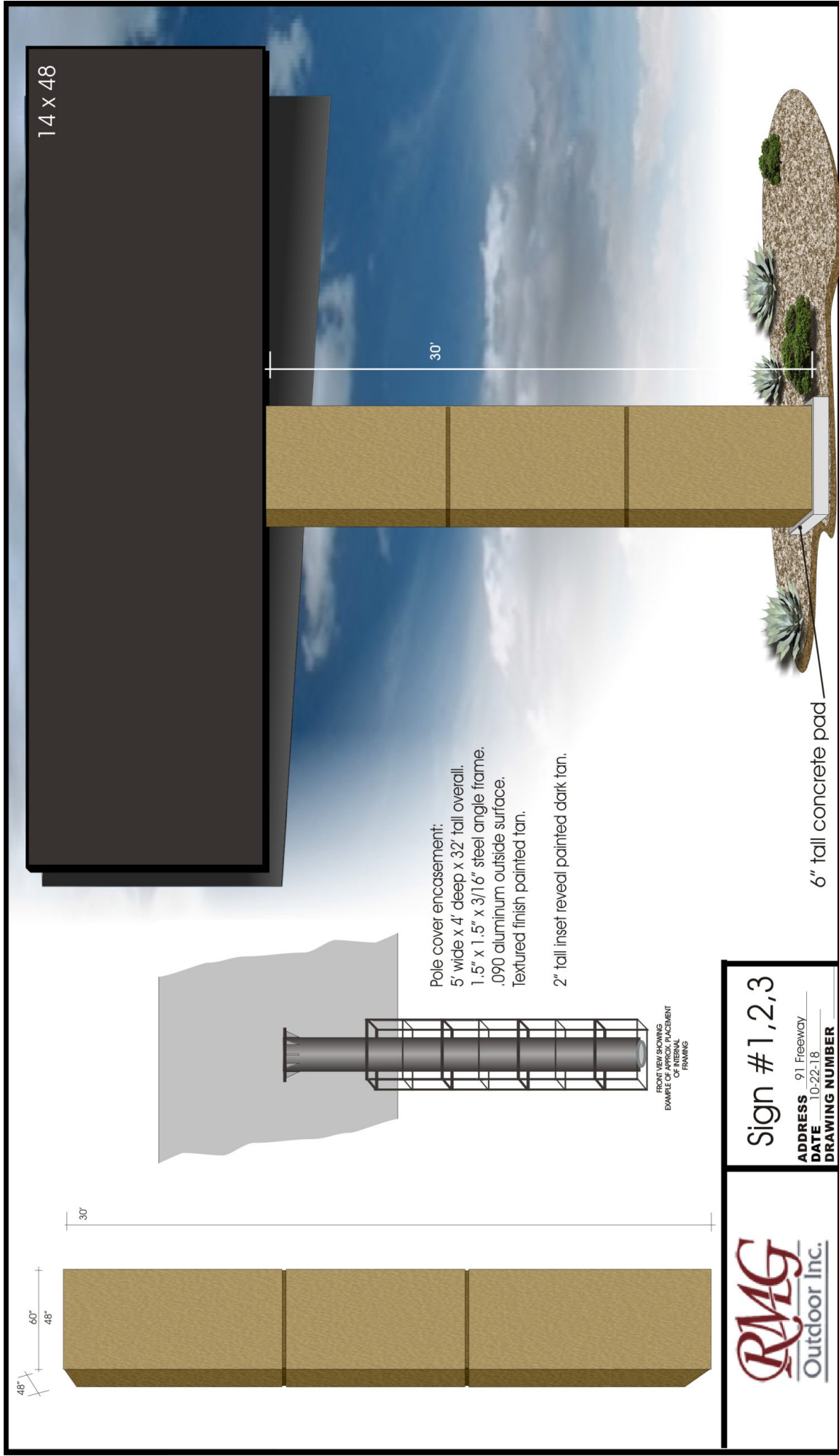


LEGEND

- | | |
|-------------------------------|---------------------------|
| (E) EXISTING | |
| AC ASPHALTIC CONCRETE SURFACE | |
| CL CENTER LINE | |
| FF FINISH FLOOR | |
| FL FINISH GRADE | |
| TC TOP OF CURB | |
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| RIGHT OF WAY | |
| PROPERTY LINE | |
| CENTERLINE | |
| OVERHEAD ELECTRIC | |
| EXISTING BLOCK OR STONE WALL | |
| FLOWLINE | |

PROJECT SITES C and D

Sherman Indian High School - Lamar Advertising EA
City of Riverside, California



TYPICAL SITE DEVELOPMENT

Sherman Indian High School - Lamar Advertising EA
 City of Riverside, California

FIGURE 5

west side of the perimeter access road along the northeast boundary, an alternative source is a transformer located in the track field south of Mississippi Way.

The message board near the intersection of Magnolia Avenue and Jackson Street will be a smaller three-sided structure 17 feet by 17 feet mounted on a 10-foot pole with an overall height of 27 feet. The side facing the north towards the intersection will be an LED digital board and the other two boards will be static boards (see Figure 6).

An LED digital message board consists of a display surface that supports an image generated by rows of light emitting diodes (LED). The image on the billboard is static for a period of time, not less than six to ten seconds with an average of eight seconds, before cycling to the next image.

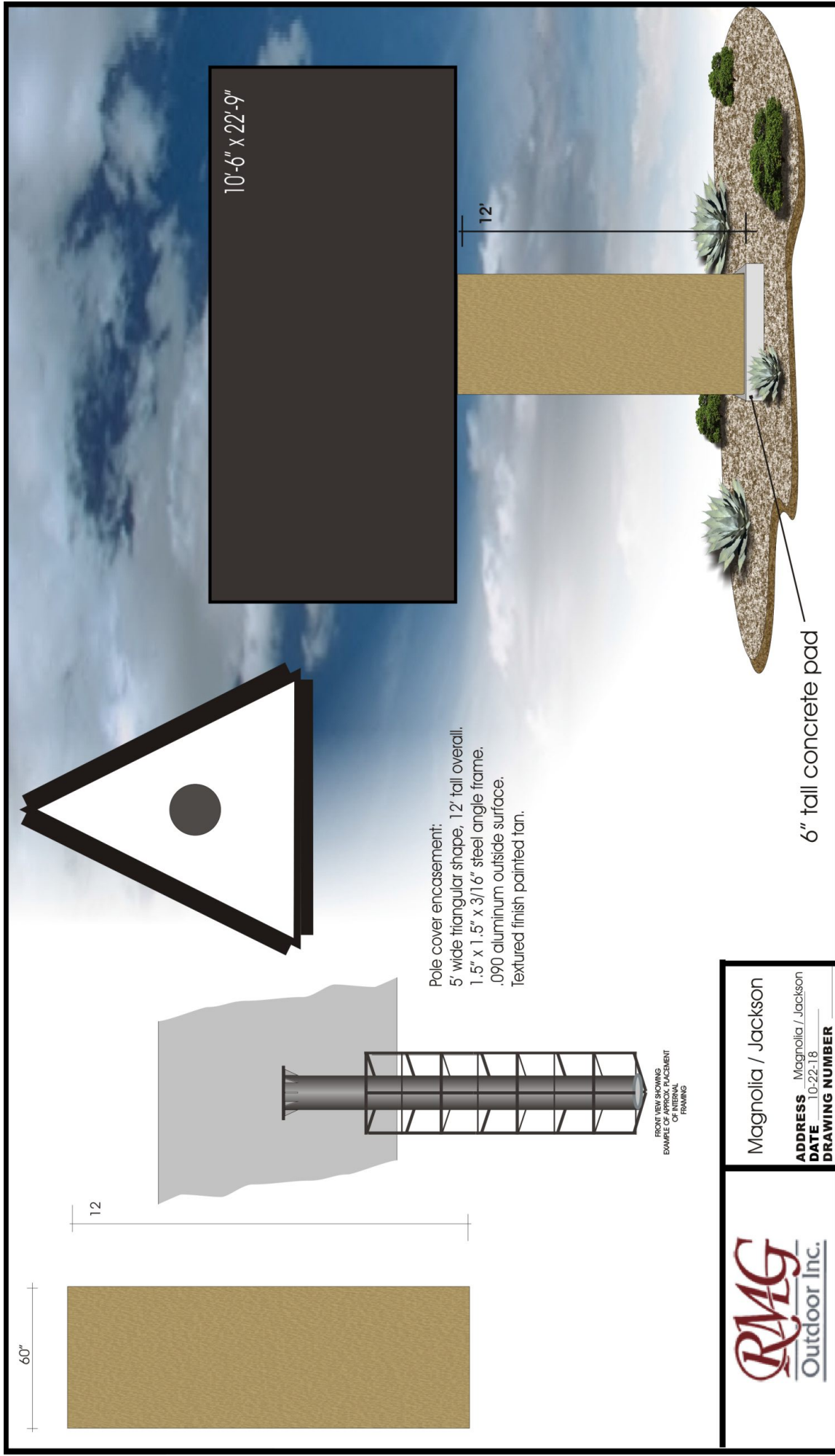
California regulates outdoor advertising in the California Outdoor Advertising Act (Business and Professions Code, Sections 5200 et seq.) and the California Code of Regulations, Title 4, Division 6 (Sections 2240 et seq.), which incorporate the Federal Highway Beautification Act by reference. Additional restrictions on outdoor signage are found in the California Vehicle Code, Section 21466.5, which prohibits the placing of any light source "...of any color of such brilliance as to impair the vision of drivers upon the highway." Specific standards for measuring light sources are provided therein.

A digital billboard is identified as a "message center" in the statute, which is an advertising display where the message is changed more than once every two minutes, but no more than once every four seconds. (Business and Professions Code, Section 5216.4) In brief, off-premises changeable electronic variable message signs (CEVMS) shall incorporate standards pertaining to:

1. Duration of Message
2. Transition Time
3. Brightness
4. Spacing
5. Locations

In order to comply with recommended guidelines and required regulations, design elements and/or operational details to be incorporated in the Proposed Action were provided by Lamar and include the following:

- Brightness of each digital display: Lighting levels on each face of the digital billboard will not exceed 0.3 foot candles over ambient levels, as measured using a foot candle meter at a 250-foot distance, according to the guidelines of the Outdoor Advertising Association of America (OAAA);
- Light sensors would be installed with each face of the digital billboard to measure ambient light levels and to adjust light intensity to respond to such conditions and to comply with lighting level requirements;



SITE DEVELOPMENT
(Corner of Magnolia and Jackson Avenues)

Sherman Indian High School - Lamar Advertising EA
 City of Riverside, California

- Digital signage will not include any illumination or message change that is in motion or appears to be in motion or that change or expose a message for less than four seconds. Typical message changes occur on an average of eight seconds;
- Digital signage would be controlled remotely and would have remote maintenance software, and the sign will immediately shut off, or go to “full black” in the event of a malfunction;
- Signs shall be 14 feet by 48 feet within the parameters of signs being no larger than 25 feet in height and 60 feet in width, excluding border, trim and supports;
- Signs on the same side of the freeway will be separated by at 500 feet;
- Digital signs facing the same direction shall be separated by 1,000 feet along a freeway;
- Signs shall not include flashing, intermittent or moving lights, and shall not emit light that could obstruct or impair the vision of any driver;
- No sign shall display any statements or words of an obscene, indecent or immoral character; and
- No signs shall imitate or resemble any official traffic sign, signal or device, nor shall signs obstruct or interfere with official signs.

These provisions of law and regulation effectively regulate sign location and brightness to ensure that digital billboards will not be located or operated in such a manner as to create hazards due to lighting conditions themselves. Digital billboards are equipped with sensors that modify the brightness of the sign in response to ambient lighting conditions, thus ensuring that the brightness of the display in evening, nighttime or dawn conditions does not present a traffic hazard nor affect surrounding land uses.

As digital board technology has developed, the issue has been raised as to whether digital billboards, despite compliance with recommended and required operating restrictions, present a distraction to drivers and could lead to an increase in accidents. The Federal Highway Administration (FHWA) (Guidance on Off-Premise Changeable Message Signs - http://www.fhwa.dot.gov/real_estate/oac/policy_and_guidance/offprmsgsgnguid.cfm) has monitored the issue closely and has researched existing literature and reports of studies, key factors and measures relating to CEVMS and effects on traffic. They confirmed that there have been no definitive conclusions about the presence or strength of adverse safety impacts from CEVMS [FHWA - *Driver Visual Behavior in the Presence of Commercial Electronic Variable Message Signs* (FHWA-HEP-16-036), September 2012].

Similarly, a study performed under the National Cooperative Highway Research Program (NCHRP), Project 20-7 (256) entitled “Safety Impacts of the Emerging Digital Display Technology for Outdoor Advertising Signs” (NCHRP Report, January 2009) reviewed existing literature. Various reports in the existing literature agreed that digital billboards should be regulated as a means of protecting the public interest and driver safety. These regulations and recommendations are included in California regulations discussed above and incorporated in the project’s design elements.

2.2 NO ACTION ALTERNATIVE

The No Action Alternative must be considered within an Environmental Assessment. If this alternative is selected, the BIE would not approve leases or other proposals for the Proposed Action. Economic benefits to augment school funds will not be realized. Current land uses would continue at the sites. There would be no environmental impacts as no advertising displays would be developed.

2.3 PREFERRED ALTERNATIVE

The preferred alternative is to complete all administrative actions and approvals necessary to authorize the installation of the message boards at the SHIS as described under Section 2.1 Proposed Action.

3.0 THE AFFECTED ENVIRONMENT AND POTENTIAL IMPACTS

The SIHS is an off-reservation boarding high school for Native Americans. The school originally opened in 1892 as the Perris Indian High School, in Perris, California. In 1903 the school was relocated to Riverside, California and renamed The Sherman Institute. In 1971 the school was accredited by the Western Association of Schools and Colleges and renamed as the Sherman Indian High School.

The school is operated by the Bureau of Indian Education, a division of the Bureau of Indian Affairs, under the United States Government Department of the Interior. All students enrolled are members of federally recognized tribes. Students represent over 76 recognized tribes from across the United States. The school serves grades 9 to 12.

The SIHS is located in a urban built up area in the City of Riverside, California. The Chemawa Middle School, operated by the Riverside Unified School District, is located immediately adjacent to the east, the Parkview Community Hospital Medical Center and other healthcare development are located to the north across from Magnolia Avenue. Commercial development exists along the Magnolia Avenue frontage to the west. The area to the west of and along Jackson Avenue consists of two churches, one including a private school at the southwest corner of Magnolia and Jackson avenues, and multi-family and single family residences to the southwest. The California Baptist University Campus is located less than ½-mile east of SIHS on Magnolia Avenue. The SIHS property boundary on the south is defined by SR-91.

The Proposed Action would allow for the development of a total of four (4) outdoor advertising structures. Three structures, each consisting of pylons with pole casings and two displays, one static and one digital, would be constructed along the southern property boundary fronting SR-91. The message boards would be operated by Lamar and would display advertising, as well as public service messages and other non-revenue generating messages promoting school events. One pylon with pole casing would support one digital message board and two static boards within the SIHS property at the southeast corner of Jackson Street and Magnolia Avenue. This message board would be utilized for school and community announcements as well as for revenue-generating commercial advertisements.

3.1 THE NO ACTION ALTERNATIVE

Under the No Action Alternative, the Proposed Action would not receive a lease nor be constructed on SIHS grounds. Existing conditions would not be impacted. There would be no project-related ground disturbance and no impacts to any environmental resources. Under the No Action Alternative, the BIA, BIE, and the SIHS would not realize potential financial benefits for educational purposes resulting from the lease of advertising space to Lamar.

3.2 PROPOSED ACTION

The following sections describe the affected environment and potential impacts related to implementation of the Proposed Action.

3.2.1 Land Resources

Topography (land forms, drainage, gradients)

The project site is to be developed within the school grounds of the SHIS. The topography is relatively flat at an elevation of 800 feet above mean sea level. Implementation of the Proposed Action does not involve changes to landforms, drainage, or gradients.

Soils (types, characteristics)

According to the City of Riverside General Plan and Supporting Documents EIR, the SIHS is underlain by two soil types: (1) Arlington and (2) Hanford; these soils are not identified to have a high shrink swell potential. The soil types and characteristics do not preclude the Proposed Action. Lamar will conduct a detailed soils analysis prior to commencing construction of the structures to ensure sufficient soil stability to support the structures in the manner required by state and federal regulations.

Geology, Mineral and Paleontological Resources

According to the City of Riverside General Plan and Supporting Documents EIR, the school property is identified to have a moderate to very high generalized liquefaction susceptibility. As reported in the *Results of a Class III (NEPA/NHPA) Cultural Resources Investigation for the proposed Sherman Indian High School Campus Billboard Locations* prepared by McKenna et al., no paleontological resources have been identified within the campus property and the potential for such resources is considered to be low.

3.2.2 Water Resources (Surface and ground; quality, quantity, use, rights)

Water service at the SIHS is provided by the Western Municipal Water District. Water demand related implementation of the Proposed Action would be limited to water use during construction. Operation of the message boards will not require water.

The SIHS overlies the Arlington Groundwater Management Zone of the Santa Ana Region Basin Plan. According to the City of Riverside General Plan and Supporting Documents EIR, groundwater is not extracted from the Arlington groundwater basin because of poor water quality resulting from historic agricultural activities. The Proposed Action does not include activities that would further impact groundwater.

The SIHS is located within the Hole Lake hydrologic unit (HUC 180702030803) of the Santa Ana River watershed. The project area has been built-out and there are no natural surface waters such as wetlands, channels, or flood plains. The nature and location of the Proposed Action is expected to have no impact as related to surface and water drainage, groundwater, flooding, water quality and use.

3.2.3 Air

The Federal Clean Air Act (Act) of 1970 (as amended) requires attainment of National Ambient Air Quality Standards (NAAQS) for criteria air pollutants, i.e. pollutants causing human health impacts due to their release from numerous sources. The Act requires each state to develop a State Implementation Plan (SIP) to attain the NAAQS by the applicable attainment deadlines. SIPs must be approved by the Federal Environmental Protection Agency (EPA) as containing sufficient measures to timely attain NAAQS and meet other requirements described below. SIPs must contain air pollution measures in adopted, "regulatory" form within one year after approval by EPA.

The Project Site is located in the South Coast Air Basin (SCAB). The South Coast Air Quality Management District (SCAQMD) has local jurisdiction over Federal and State air quality issues and regulations within the SCAB. Local districts are responsible for preparing the portion of the SIP applicable within their boundaries; adoption of control regulations for stationary sources; implementation of indirect source and transportation control measures (e.g. employee ridesharing rules); and to assist local agencies to determine if a project's emissions could pose a significant threat to air quality. The air and dust emissions from construction of the Proposed Action were evaluated and compared to the SCAQMD standards and evaluated against applicable air quality thresholds.

Air Quality Background

Air quality is determined primarily by the types and amounts of contaminants emitted into the atmosphere, the size and topography of the local air basin and the pollutant-dispersing properties of local weather patterns. When airborne pollutants are produced in such volume that they are not dispersed by local meteorological conditions, air quality problems result. Dispersion of pollutants in the SCAB is influenced by periodic temperature inversions, persistent meteorological conditions and the local topography. As pollutants become more concentrated in the atmosphere, photochemical reactions occur, producing ozone and other oxidants.

Air emissions from the project are subject to federal, State and local rules and regulations implemented through provisions of the Act, California Clean Air Act and the rules and regulations of the California Air Resources Board (CARB) and SCAQMD. Under the provisions

of the federal and California Clean Air Acts, air quality management districts with air basins not in attainment of the air quality standards are required to prepare an Air Quality Management Plan (AQMP). An AQMP establishes an area-specific program to control existing and proposed sources of air emissions so that the air quality standards may be attained by an applicable target date. SCAQMD released the 2016 AQMD draft for review and comment June 2016.

The Act and California Clean Air Act were established in an effort to assure that acceptable levels of air quality are maintained. These levels are based upon health-related exposure limits and are referred to as NAAQS and as applicable the California Ambient Air Quality Standards (CAAQS). The ambient air quality standards establish maximum allowable concentrations of specific pollutants in the atmosphere and characterize the amount of exposure deemed safe for the public. Primary federal standards reflect levels of air quality deemed necessary by the federal EPA to provide an adequate margin of safety to protect public health. Areas that meet the standards are designated attainment and if found to be in violation of primary standards are designated as nonattainment areas. Secondary standards reflect levels of air quality necessary to protect public welfare from known or anticipated adverse effects of a pollutant.

The EPA and the CARB have designated portions of the SCAB as nonattainment for a variety of pollutants, and some of those designations have an associated classification. Table 1 lists these designations and classifications. The SCAQMD has adopted attainment plans for a variety of nonattainment pollutants.

**Table 1
Federal Air Quality
Attainment Status for SCAB**

Ambient Air Quality Standard	Status ¹
One-hour Ozone	Non-attainment (Extreme)
Eight-hour Ozone	Non-attainment (Extreme)
PM ₁₀	Attainment (Maintenance) ²
PM _{2.5}	Non-attainment (Serious)
Carbon Monoxide	Attainment (Maintenance)
Nitrogen Dioxide	Attainment/unclassified
Sulfur Dioxide	Attainment/unclassified
Lead	Non-Attainment (Partial) ³

Source: SCAQMD, February 2016

- 1) U.S. EPA often only declares Nonattainment areas; everywhere else is listed as Unclassifiable/Attainment or Unclassifiable
- 2) Annual PM₁₀ standard was revoked, effective December 18, 2006; 24-hour PM₁₀ NAAQS deadline was 12/31/2006; SCAQMD request for attainment redesignation and PM₁₀ maintenance plan was approved by U.S. EPA on June 26, 2013, effective July 26, 2013.
- 3) Partial Nonattainment designation – Los Angeles County portion of Basin only for near-source monitors. Expect to remain in attainment based on current monitoring data.

SCAQMD regulates emissions from stationary sources through the permitting process and requires permits to Construct/Operate for all stationary equipment with the potential to release air contaminants. The Proposed Action will not include any stationary emission sources. Construction equipment/diesel equipment must meet requirements of the CARB’s off-road diesel vehicles regulations to reduce diesel pollutants. Construction activities will be required to

comply with SCAQMD Rules 401 (visible emissions); 402 (nuisance); and 403 (dust fugitive). Operations will have no impact on air quality besides the indirect use of commercial electricity.

Air Quality Emissions (Criteria Pollutants)

Construction Emissions

The Proposed Action is the installation and operation of four off-site advertising structures containing both static and digital advertising displays on the SHIS property. Installation within the SHIS property would require trenching, minor grading, drilling, and erection of the message boards. Construction of the structures along the southeastern boundary will require trenching for approximately 1,500 feet to underground electrical utility infrastructure and the boring of an approximately 4-foot wide hole to an approximate depth of 20-25 feet for the placement of each pole. All construction activities shall follow lease stipulations, best management practices with respect to dust control, and standard safety procedures. It is expected that the construction of each structure will take approximately five working days. Construction activities will include removing the existing power line and poles, trenching to underground the power utilities, drilling for the pole placement, construction of the board itself, and final grading and landscaping. Each of the above activities would take approximately one to two day per site. Equipment is listed below and trucks would deliver equipment and the structures to the site. All construction will be coordinated with SIHS to ensure the safety of SIHS employees and students.

The project's construction activities were screened for emission generation using SCAQMD guidelines and the SCAQMD Off-Road Mobile Source Emissions Factors (2016). These factors are used to generate emissions estimates for development projects. The criteria pollutants screened for included: reactive organic gases (ROG), nitrous oxides (NO_x), carbon monoxide (CO), and particulates (PM₁₀ and PM_{2.5}). Two of these, ROG and NO_x, are ozone precursors.

Typical daily equipment is listed below and would be operated one to two days for each site; up to 25 days of construction scheduled.

- 1 Trencher
- 1 Crane
- 1 Drill Rig
- 1 Backhoe
- 1 Loader
- 1 Miscellaneous Construction Equipment

Construction earthwork emissions are considered short-term, temporary emissions and include implementation of dust control and equipment emission standards. The resulting emission levels as compared to SCAQMD thresholds which are related to the achievement of the NAAQS are shown in Table 2.

As shown below, construction emissions would not exceed SCAQMD thresholds nor impact NAAQS. Therefore, a less than significant impact to air quality is expected.

Table 2
Construction Emissions
(Pounds per Day)

Source	ROG	NO_x	CO	PM₁₀	PM_{2.5}
Trencher	1.0	4.6	3.6	0.4	0.4
Crane	0.9	7.5	3.4	0.3	0.3
Drill Rig	0.5	4.3	4.0	0.1	0.1
Backhoe	0.5	3.3	3.0	0.2	0.2
Loader	0.8	5.7	3.6	0.3	0.3
Misc. Construction Eq.	0.6	4.5	2.9	0.2	0.2
Totals (lbs/day)	4.2	29.8	20.5	1.5	1.5
SCAQMD Threshold	75	100	550	150	55
Significant	No	No	No	No	No

Source: SCAQMD Off-Road Mobile Source Emissions Factors (2016)

Operational Emissions

No direct operational air pollution emissions will occur and project generated traffic associated with operations and maintenance activities would also be negligible. Maintenance for each billboard is expected to require an average of one field trip per month, or 12 per year. Each field trip is anticipated to require two employees traveling in one street legal vehicle. Therefore, no significant operational emissions are anticipated.

Commercial electrical power will be used for the LED illuminated and lit billboard displays. Electrical consumption has no single uniquely related air pollution emissions source because power is supplied to and drawn from a regional grid. Electrical power is generated regionally by a combination of non-combustion (nuclear, hydroelectric, solar, wind, geothermal, etc.) and fossil fuel combustion sources (mostly natural gas). There is no direct nexus between consumption and the type of power source or the air basin where the source is located. Operational air pollution emissions from electrical generation are therefore not attributable on a project-specific basis and would be less than significant.

Compliance with SCAQMD Rules 402 and 403

Although the Proposed Action does not exceed SCAQMD thresholds, the contractor will be required to comply with all applicable SCAQMD rules and regulations. To limit dust production, the contractor must comply with Rules 402 and 403, which require the implementation of Best Available Control Measures (BACM) for each fugitive dust source. This would include, but not be limited to the following BACMs, as included in the SCAQMD Rules and Regulations:

1. *The Project proponent shall ensure that any portion of the site to be graded shall be pre-watered prior to the onset of grading activities.*
 - I. *The Project proponent shall ensure that watering of the site or other soil stabilization method shall be employed on an on-going basis after the initiation of any grading activity*

on the site. Portions of the site that are actively being mined shall be watered to ensure that a crust is formed on the ground surface, and shall be watered at the end of each workday.

II. The Project proponent shall ensure that all disturbed areas are treated to prevent erosion.

III. The Project proponent shall ensure that all earth handling activities are suspended when winds exceed 25 miles per hour.

Exhaust emissions from vehicles and equipment and fugitive dust generated by on-site activities, would slightly increase NO_x and PM₁₀ levels in the area. Although the Proposed Action would not exceed SCAQMD thresholds during construction or operations, the Applicant would be required to implement the following conditions as required by SCAQMD:

- 2. All heavy equipment must be tuned and maintained to the manufacturer's specification to maximize efficient burning of vehicle fuel.*
- 3. The applicant shall maintain and effectively utilize and schedule on-site equipment in order to minimize exhaust emissions from truck idling.*
- 4. The applicant shall comply with all existing and future CARB and SCAQMD regulations related to diesel-fueled trucks and equipment, which may include among others: (1) meeting more stringent emission standards; (2) retrofitting existing engines with particulate traps; (3) use of low sulfur fuel; and (4) use of alternative fuels or equipment.*

SCAQMD rules for diesel emissions from equipment and trucks are embedded in the compliance for all diesel fueled engines, trucks, and equipment with the statewide CARB Diesel Reduction Plan. These measures will be implemented by CARB in phases with new rules imposed on existing and new diesel-fueled engines and truck and equipment fleets.

Compliance with existing rules and regulations and conditions as listed above would result in the Proposed Action's emissions being less than significant.

3.2.4 Living Resources

The three sites on the southeast side of the school are vacant, disturbed non-native grass areas used for parking during events on campus and are outside a fenced baseball field. Site D along Magnolia Avenue is maintained grass landscaping.

Wildlife (terrestrial, aquatic, threatened/endangered)

The sites consist of a mix of disturbed, non-native grass fields and disturbed habitat types and do not contain any natural habitat for local wildlife.

Vegetation (terrestrial, aquatic, riparian, threatened/endangered)

The disturbed, non-native grass fields on the south are dominated by bermuda grass (*Cynodon dactylon*). Other species present include cheeseweed (*Malva parviflora*), barley (*Hordeum* sp.), brome (*Bromus* sp.), dandelion (*Taraxacum* sp.), and filaree (*Erodium* sp.). The disturbed habitat is characterized by dirt roads and areas devoid of vegetation.

Site D is located in a maintained lawn area dominated by bermuda grass.

No impacts to natural vegetation will occur.

Ecosystems and Biological Communities

The sites are not located within Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) criteria cells. Further, the sites are not within the MSHCP Narrow Endemic Plant Species (NEPS) or Criteria Area Species (CAS) survey areas. In addition, no critical habitat for species listed as threatened or endangered under the U.S. Endangered Species Act occurs within or adjacent to the SIHS site. The California Natural Diversity Data Base (CNDDB) indicated that no sensitive species have been reported in the vicinity of the SIHS site.

Agriculture (livestock, crops, prime and unique farmland)

The project site is located in an urban setting and has been developed with the SIHS. Portions of the property are vacant but do not support any natural vegetation or habitats; all of the property has been impacted by the development of the campus and/or school uses. There are no livestock, crops, prime or unique farmland that would be affected by the Proposed Action.

3.2.5 Cultural Resources

A Class (III) (NEPA/NHPA) Cultural Resources Investigation was completed by McKenna et al. the findings are summarized herein (January 19, 2016). The study was undertaken to fulfill the federal Section 106 process, as defined by 36 CFR 800, of the National Historic Preservation Act, as amended.

Historic and Archeological Resources

In assessing the Area of Potential Effects (APE) for the proposed billboard locations on the grounds of the SIHS campus, McKenna et al. completed an overview survey for the four specific locations and also addressed the campus as a whole – with respect to historic background and remaining components. The APE for the Proposed Action was identified as the current boundaries of the SIHS campus.

Overall, the SIHS campus is within a geographical area of scattered historic structures, most of which have been evaluated as “ineligible” for listing. Those identified as “eligible” include a portion of the California Baptist College; Arlington Library and Fire Hall, and the Administration Building/Sherman Indian Museum at SIHS. Each of these is an institutional

facility (school or public buildings). No private residences, historic streets, or other archaeological sites are represented. Overall, McKenna et al. concluded that the project area is considered highly sensitive for the presence of additional historic components related to the development of the SIHS.

The Sherman Indian Museum was listed in the National Register of Historic Places in 1980. The museum is located northeast of the proposed Site D message board along the Magnolia Avenue frontage. The museum is operated independently of the SIHS campus and is physically separated by fencing that makes it accessible only during operating hours. The proposed Site D billboard will be within visual proximity of the Museum; therefore there is a potential for visual impact.

By designing a relatively low billboard with lighting directed away from the Museum, potential impacts can be avoided or mitigated. The design of the message board at this site is a three-sided structure with three board faces each 17 feet by 17 feet with a maximum height of 27 feet. The pole will be covered in an encasement with the school's colors and logos per SIHS design with a landscaped base area (refer to Figure 5). The digital board will face westward away from the Museum towards the intersection and the other two boards will be static. This message board will replace three old wooden signs now used as school message boards. The smaller size and direction of the digital sign will minimize any potential impact to the Museum. In addition, other buildings partially block the sign from the Museum.

The three message boards proposed for the SR-91 frontage will be along the southeastern boundary of the project and not visible from the core of the campus. These billboards will only be visually accessible from the southeastern extent of modern sports fields. They will be separated from the developed campus by an open expanse of land that is either developed with sports fields or unused and not landscaped nor maintained. The placement of the billboards in this area of the campus is not determined to result in any adverse effects and mitigation is not necessary or recommended.

Cultural, Sacred, and Traditional Cultural Properties

The SIHS campus was assessed/evaluated in accordance with federal and state guidelines and found to be eligible for listing in the National Register of Historic Places under Criteria A (events) and B (persons) for evaluation in association with events, persons in history, and architecture. As an eligible property, adverse impacts to the resource must be avoided or mitigated. In this case, the Proposed Action involves the establishment of four message boards within the campus. These message boards will be placed on the peripheries of the property and not adjacent to any standing structures. The SIHS has been rebuilt at least three times and only one of the original buildings remains (the Sherman Indian Museum). This building is already listed as a National Register of Historic Places property with a "state" level of significance, is considered eligible/listed in the California Register of Historical Resources and is currently listed as the local Riverside Cultural Heritage Board Landmark (No. 16). However, with the exception of the Museum, the SIHS is essentially a modern campus.

Standard Construction Practice

If, at any time, there is evidence of human remains (or potentially human remains), the County Coroner must be called immediately and permitted to examine the find(s). If the remains are determined to be of Native American origin, the Native American Heritage Commission will identify the Most Likely Descendent (MLD) and, in consultation between the property owner, MLD, and consulting archaeologist, the disposition of the remains will be determined. The cost of any remediation or mitigation will be borne by the property owner.

3.2.6 Socioeconomic Conditions

Employment and Income

According to the United States Census Bureau statistics for the City of Riverside, California, the population estimate as of July 1, 2014 was 319,504. According to their 2010-2014 American Community Survey 5-Year Estimates the labor force was estimated at 151,305 with 130,146 employed and 21,043 unemployed. The average median income for the same time period was \$56,089.

Demographic Trends

According to the City of Riverside General Plan, the City's population has continuously grown since the time following World War II and the City's populations is projected to continue to increase. The population is described as diverse in race and ethnicity. As reported in the General Plan, Hispanic comprise 48 percent of the population followed by Whites at 38 percent, and Asians and Black at 6 percent each. The American Indian and Alaska Native population as reported in 2010 Census was 1.1%.

Lifestyle and Cultural Values (rural, urban)

The SIHS is governed by the Bureau of Indian Education (BIE). The school is an off-reservation boarding high school for Native Americans; all students are enrolled members of federally recognized Tribes. The school is located in an urban setting within the City of Riverside, California.

Community Infrastructure (public services, utilities)

Public services and utility services at the SIHS are provided by the City or Riverside and/or its local vendors.

Environmental Justice

Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations*, was signed by President Clinton in 1994. The Order requires agencies to advance environmental justice by pursuing fair treatment and meaningful involvement of minority and low-income populations in federal programs, policies, decisions

and operations. Fair treatment means such groups should not bear a disproportionately high share of negative environmental consequences from such undertakings. Meaningful involvement means federal officials actively promote opportunities for public participation and that federal decisions can be materially affected by participating groups of individuals.

The Proposed Action has not been found to pose significant impacts to critical elements of the environment – land resources, water resources, air resources, living resources, or cultural resources. Avoiding or minimizing impacts to resources with identified impacts, makes it unlikely that disproportionate impacts to low-income or minority populations. The Proposed Action offers positive financial benefits for the SIHS and its goal to provide education to Native American students, while recognizing environmental justice concerns.

3.2.7 Resource Use Patterns

Hunting, Fishing, Gathering

No hunting, fishing, or gathering uses exist at the project site.

Timber Harvesting

No timber harvesting land uses occur at the project site.

Agriculture

No agricultural land uses occur at the project site.

Mineral Extraction

No mineral extraction occurs at the project site.

Recreation

Four of the proposed freeway oriented digital message boards will be located near but outside the fenced limits of the SIHS baseball fields. The proposed bottom elevation of the message board is 20-feet above ground level. Although the message boards will occupy “air space” near the baseball fields a less than significant effect on recreational uses is anticipated because the boards will provide sufficient ground clearance to allow for continued recreational use of the area.

Transportation Networks

No changes to transportation networks, infrastructure, or traffic levels are proposed.

Land Use Plans

The SIHS is located within the Magnolia Heritage District of the City of Riverside Magnolia Avenue Specific Plan. The City of Riverside General Plan land use designation for the SIHS site

is Public Facilities/Institutional (PF). Chapter 19.140 of the City of Riverside Municipal Code does not identify message boards as a permitted land use, permitted accessory use, or permitted temporary use within the PF land use designation. However, local land use regulations are preempted and not applicable for federal projects on federally-owned and managed property, and therefore do not regulate the Proposed Action. The BIA is not subject to the City of Riverside Design Review process pursuant to Chapter 19.710 of the Municipal code and consistency with the development standards for the PF designation is not required.

The Proposed Action proposes message boards on the perimeter of the SIHS property designed in a manner consistent with general practice for changeable electronic variable message signs and consistent with guidelines of the FHA. The project will not compromise or otherwise negatively impact the safety and security of the students and staff or the general public nor damage existing school facilities. Although, the Proposed Action is not consistent with local regulations related to land use, no significant effect is identified.

3.2.8 Other Values

Wilderness

The SIHS is located in an urban built-up area. There are no natural habitat areas or wilderness areas at the site.

Noise and Light

Although the Proposed Action is not required to comply with City of Riverside regulations related to levels of noise as a result of the construction and operation of the Proposed Action, such regulations are instructive as to whether the Proposed Action could result in impacts to the human environment. Compliance with certain City regulations will be required as discussed herein where necessary to reduce impacts. As identified in the City of Riverside General Plan, transportation activity represents the principal ambient noise source in the city; sources include traffic on major arterial roadways, traffic on SR-91, SR-60, and I-215 freeways, train movement on the railroad lines, and flight activity associated with the Riverside Municipal Airport, Flabob Airport, and March Air Reserve Base/March Inland Port.

SIHS has a zoning designation of “Public Facilities,” the immediate vicinity includes general commercial, single-family residential as well as multi-family residential zoning as designated by the City of Riverside. The General Plan reports existing roadway noise in the vicinity of SIHS on Magnolia Avenue up to 70 CNEL and noise on SR-91 up to 65 CNEL similar conditions are projected through 2025 (Figure N-5 of City of Riverside General Plan). Figure N-10 of the General Plan identifies land use noise compatibility criteria. Normally acceptable noise levels up to 60 CNEL is identified for school land uses; normally acceptable noise levels up to 70 CNEL is identified for playground and neighborhood parks. The proposed development of message board is not noise generating. Temporary noise related to construction would occur during project implementation but no increase in ambient noise levels would occur related to operation. The temporary increase in noise during construction does not represent a significant adverse effect to ambient noise levels. Construction will be restricted between the hours of 7:00 p.m. and 7:00

a.m. on week days and between 5:00 p.m. and 8:00 a.m. on Saturdays or at any time on Sunday or federal holidays in compliance with Riverside Municipal Code Section 7.35.010 B.5.

The proposed digital message boards will utilize LED technology. The boards would constitute a new source of light to the area. Riverside County implements Ordinance No. 655 to restrict certain light sources from emitting into the night sky undesirable light rays which have a detrimental effect on astronomical observation and research. The SIHS is located outside of the area subject to Ordinance No. 655.

The Riverside Municipal Code Section 19.590.070 lists several requirements related to Light and Glare. These are addressed below through compliance with the Federal Highway Administration (FHA) guidelines for changeable electronic variable message signs.

- G. All lights shall be directed, oriented, and shielded to prevent light from shining onto adjacent properties, onto public rights-of-way, and into driveway areas in a manner that would obstruct drivers' vision.
- H. Lighting for advertising signs shall not cause light or glare on surrounding properties.
- I. Lighting shall not be directed skyward or in a manner that interferes with the safe operation of aircraft.

A lighting analysis of nighttime lighting resulting from the proposed message boards at SIHS was completed by Daktronics, Inc. (June 2016). Daktronics calculated the illumination levels in foot-candles that the proposed message boards would produce based on night-time running levels at a measurement height of five feet above ground level (approximately eye height). The calculated illumination levels represent a worst-case scenario of an all-white display. Actual levels would be much lower, as typical content runs at 25 to 35 percent of the brightness of an all-white display.

As calculated by Daktronics at a distance of approximately 760 feet, drivers on SR-91 may experience illumination levels of 0.03 foot-candles; the illumination level would increase as drivers approach the billboards with a maximum 0.22 foot-candles reported at approximately 250 feet. At Site D, the proposed message board would have the greatest illumination effect within the intersection of Jackson Street and Magnolia Avenue with a maximum illumination level of 0.31 foot-candles catty-corner from SIHS. The reported illumination levels assume absolute darkness with regard to surrounding ambient light. Ambient light producing elements at night, including but not limited to roadway lighting, residential lighting, commercial lighting, the moon, etc. would further diminish the impact of the light output from the displays.

The Proposed Action also incorporates design elements that comply with the Federal Highway Administration (FHA) guidelines for changeable electronic variable message signs. In accordance with the FHA guidelines:

- Lighting levels on each face of the digital billboard will not exceed 0.3 foot candles over ambient levels, as measured using a foot candle meter at a 250-foot distance, according to

the guidelines of the Outdoor Advertising Association of America (OAAA); (Note that the nearest residence to the west is over 375 feet distance and those residences to the south are across the freeway with sound walls and landscaping along the freeway. Multi-family residences and the two churches along Jackson Avenue would not be impacted by the bill boards lighting due to distance. Class rooms at the private school due west do not face the message board on Magnolia Avenue and in addition there on intervening trees.)

- Light sensors would be installed with each face of the digital billboard to measure ambient light levels and to adjust light intensity to respond to such conditions and to comply with lighting level requirements;
- Digital signage would be controlled remotely and would have remote maintenance software, and the sign will immediately shut off, or go to “full black” in the event of a malfunction; and
- Signs shall not include flashing, intermittent or moving lights, and shall not emit light that could obstruct or impair the vision of any driver.

The Proposed Action incorporates design elements that minimize and mitigate potential impacts related to light and glare. No adverse effects related to the new light sources are identified.

Visual

Per Section 19.620.050 of the Riverside Municipal Code pylon signs and freeway oriented signs are not allowed in locations with a Public Facilities, School, or Non-Commercial zoning designation. Freeway oriented signs are allowed under specific circumstances as outlined in Section 19.620.080(B)(7) subject to a Minor Conditional Use Permit issued by the City Planning Commission; however, under 19.620.080(B)(7)(a)(g) freeway oriented signs may not be used for general advertising for hire as proposed. The Proposed Action conflicts with the City of Riverside Citywide Design Guidelines and Sign Guidelines. Overall, freeway oriented signs throughout the City of Riverside are rare; occurring only where allowed by specific criteria identified in Section 19.620 of the Municipal Code. The Proposed Action would allow for the construction of three pylons with pole coverings and placement of six freeway oriented digital message boards on an approximately 0.20-mile stretch along SR-91. Visually, this would be inconsistent with existing conditions along SR-91 immediately east and west of the project site but not inconsistent with the occurrence of freeway oriented signs in the City as a whole. One large freeway sign for the Riverside Auto Mall is located about 1.25 miles east on SR-91.

The SIHS and the proposed message board sites are on Federal lands. The BIA within the U.S. DOI is the management agency for these potentially affected Federal lands; additionally, the BIE is the management agency for operation of the SIHS on behalf of the BIA. Pursuant to Public Law 112-74 enacted in 2011 and Public Law 113-235, subsequently enacted in 2014, authorizes the Director of the BIE to enter into agreements with private entities for the lease of school facilities in exchange for monetary compensation that benefits the school. The Proposed Action is also consistent with the proposed regulations implementing the Federal law. The Proposed Action is the lease of property on the SIHS Federal lands to allow the installation of three message boards (billboards) along the southeastern property boundary that fronts SR-91 and one near the property’s northwest corner. The proposed advertising structures will comply

with FHA guidance regarding brightness levels of the digital displays and there are no scenic visits or other views of an important nature that will be impacted by the Proposed Action.

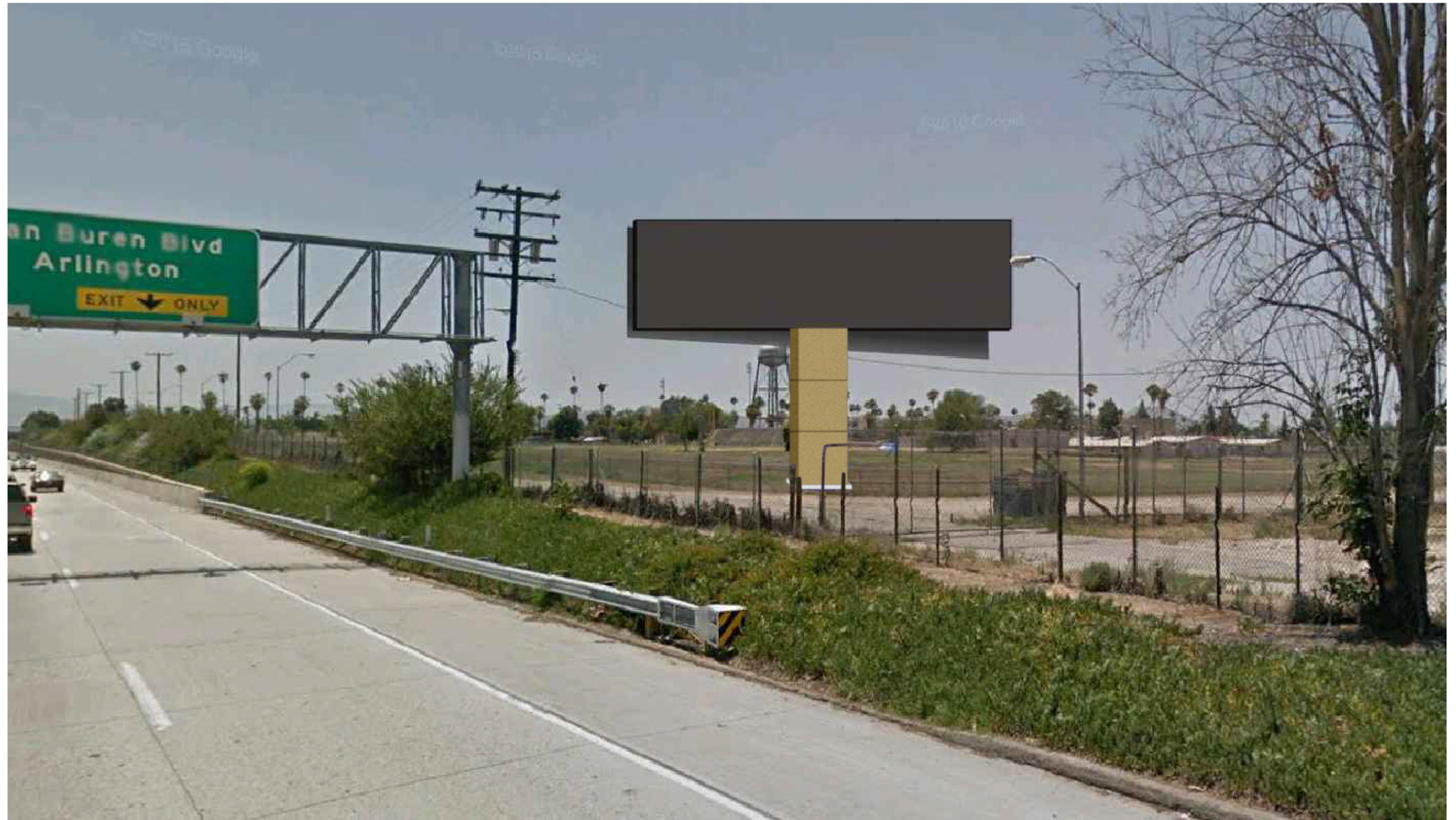
SIHS and Lamar have incorporated design elements recommended by the FHA for changeable variable message signs. Lighting design elements, discussed above under Noise and Lighting, will limit off-site light impact to the surrounding properties through light sensors that will adjust brightness based on the background lighting and restrict any flashing, intermittent or moving lights, SIHS and Lamar have also provided a visual rendering at Site “C” looking northwest from SR-91 was prepared in support of the EA (see Figure 7). Proposed design elements incorporated into the Proposed Action that will limit and minimize impacts to the visual character of the area include:

- Signs shall be 14 feet by 48 feet within the parameters of signs being no larger than 25 feet in height and 60 feet in width, excluding border, trim and supports;
- Signs on the same side of the freeway will be separated by at 500 feet;
- Digital signs facing the same direction must be separated by 1,000 feet along a freeway;
- No sign shall display any statements or words of an obscene, indecent or immoral character; and
- No signs shall imitate or resemble any official traffic sign, signal or device, nor shall signs obstruct or interfere with official signs.

Because of special circumstances related to Federal lands, the BIA may approve the proposed lease even though the proposal conflicts with local ordinances. Because, in general, the City of Riverside Municipal Code allows for the development of freeway oriented signs under special criteria, because freeway oriented signs occur elsewhere in the City, and because the project incorporates design elements to limit and minimize visual impacts, the Proposed Action is not identified to have the potential to result in a significantly adverse effect to visual resources.

Public Health and Safety

The City of Riverside General Plan identifies automobile and structural fires as the most common types of fires in urbanized areas. The Fire Department Operation Division responds to emergency calls in the City and has mutual aid agreements with the Riverside County Fire Department and the California Department of Forestry and Fire Protection for fire protection in unincorporated territory within the City’s sphere of influence. The City’s Fire Department operations average response time is six minutes. Law enforcement/police services are provided by the Riverside Police Department. The Field Operations Division provides first response to all emergencies, performs preliminary investigations and provides basic patrol services. The SIHS is located in the City’s central policing center. The Proposed Action would not result in uses that generate a demand for emergency response services and no impact to the public health and safety is anticipated.



Source: Joseph E. Bonadiman Associates, 11/2015.

TYPICAL RENDERING
N.T.S.

Rendering at Site "C" looking south west from 91 Freeway.

VISUAL SIMULATION

*Sherman Indian High School - Lamar Advertising EA
City of Riverside, California*

Climate Change (Greenhouse Gases)

There is no formally adopted NEPA threshold for GHG emissions for use in making a determination regarding the significance of environmental effects related to GHG emissions in the environmental review process. However, the United States Council on Environmental Quality Guidance (CEQ) recently issued guidance to assist Federal agencies in their consideration of the effects of Climate Change and Greenhouse Gas Emissions when evaluating proposed Federal actions in accordance with NEPA.

At the state level, Assembly Bill 32, The Global Warming Solutions Act of 2006, requires that by the year 2020, the Greenhouse Gas (GHG) emissions generated in California be reduced to the levels of 1990.

Typically, new project GHG emissions are treated as standard emissions, and air quality impacts are evaluated for significance on an air basin or even at a local neighborhood level. Greenhouse gas emissions are treated differently as the perspective is global, not local. Many gases make up the group of pollutants that are believed to contribute to global climate change. However the three gases that are currently evaluated are carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). GHG emissions were evaluated using SCAQMD's Off-Road Mobile Source Emissions Factors (2016), and California Climate Action Registry General Reporting Protocol, 2009I; CalEEMod parameters; and Climate Leaders EPA, Section 3, Table 2.

Construction GHG emissions were estimated based on the construction schedule. The only operational GHG emissions will be from the use of electrical power purchased from a commercial source (Southern California Edison or the City of Riverside) and a once a month maintenance site visit by a vehicle. A static billboard with standard lighting utilizes approximately 7,000 kWh/year and an LED board utilizes approximately 86,500 kWh/year. With 5 static boards and 4 LED boards, it is estimated that annual electrical usage would total approximately 381,000 kWh/year or 381 MWh/year. GHG emissions were estimated utilizing an emission factor of 557 lbs of CO₂ per MWh from the San Bernardino County GHG Plan and the SCE's website, which reported 23.5% of renewable power produced in 2014.

Model results for GHG emissions related to the Proposed Action are shown in Table 3. Locally, a threshold of 3,000 metric tons of carbon dioxide equivalent (MTCO₂e) per year has been adopted by SCAQMD for determining a project's potential for significant impact to global warming for non-industrial projects (SCAQMD website July 2016). This amount is a reasonable threshold to determine significance for the Proposed Action.

As shown in Table 3, GHG emissions related to the Proposed Action are expected to be minimal (less than 100 MTCO₂e per year) and not anticipated to exceed the SCAQMD GHG emissions threshold. Therefore, impacts to climate change and GHG are anticipated to be less than significant.

**Table 3
Greenhouse Gas Emissions
Metric Tons CO₂e**

Source/Phase	CO ₂	CH ₄	N ₂ O
<i>Construction (25 days)</i>			
Trencher	7.1	0.0	0.0
Crane	15.5	0.0	0.0
Drill Rig	19.8	0.0	0.0
Backhoe	8.0	0.0	0.0
Loader	13.1	0.0	0.0
Misc. Construction Equipment	14.8	0.0	0.0
Total Per Year	78.2		
Construction GHG amortized over 30 years	2.6		
<i>Operational Electric Usage</i>	96.5		
Total MTCO₂e Per Year	99.1		
SCAQMD Threshold	3,000		
Significant	No		

Sources: Emission Factors for On-Road Heavy-Heavy Duty Diesel Trucks (2016); CalEEMod; California Climate Action Registry General Reporting Protocol, 2009I;
Note: 30 day construction schedule; construction emissions amortized for 30-year life.

Indian Trust Assets

Implementation of the Proposed Action allows the BIA, BIE, and the SIHS the opportunity to realize potential financial gains resulting from the lease of advertising space to Lamar. The Proposed Action offers positive consequences for SIHS.

Hazardous Materials

Pursuant to California Government Code Section 65962.5 the California Department of Toxic Substances Control (DTSC) compiles the Cortese List and updates it at least annually. The Cortese List identifies hazardous waste facilities subject to corrective actions, land designated as hazardous waste property or border zone property, sites included in the abandoned site assessment program, and qualifying sites pursuant to Section 25356 of the Health and Safety Code. A copy of the most recent Cortese List was retrieved from DTSC EnviroStor online database on January 28, 2016; the SIHS property is not identified on the list. No environmental effects related to hazardous materials are identified.

Note that Condition 26 in the draft lease agreement covers hazardous materials.

26. Hazardous Materials. *BIE represents and warrants to Lamar that the Premises and adjacent property owned or controlled by BIE is not now, nor has it ever been affected by the presence of Hazardous Materials. BIE covenants and agrees to remove and remediate, at BIE's cost, any and all Hazardous Materials (whether currently existing or later discovered or introduced) in conformance with applicable law, unless the release of Hazardous Materials is caused by Lamar. Lamar shall give BIE prompt written notice of any spills,*

releases, discharges, disposals, emissions, migrations, removals or transportation of Hazardous Materials on, under or about the Premises of which Lamar is aware. In no event shall Lamar have any obligation to remove or remediate any Hazardous Materials on the Premises unless brought to the Premises by Lamar. In the event that BIE fails to remove and remediate any Hazardous Materials existing on the Premises within three (3) months after notice thereof, and Lamar elects not to perform such remediation on BIE's behalf, then Lamar shall have the right to assert the Termination Remedy set forth in Section 20 above (but no other remedy). Notwithstanding anything contained herein to the contrary, Lamar indemnifies the United States against all liabilities or costs relating to the use, handling, treatment, removal, storage, transportation, or disposal of Hazardous Materials, or the release or discharge of any Hazardous Materials from the Premises caused by Lamar or its agents during the Lease Term.

4.0 MITIGATION AND MONITORING

Mitigation includes specific means, measures or practices that would reduce or eliminate effects of the Proposed Action or alternatives. Mitigation measures can be applied to reduce or eliminate adverse effects to biological, physical, or socioeconomic resources. Mitigation may be used to reduce or avoid adverse impacts, whether or not they are significant in nature.

Measures or practices will only be termed mitigation measures if they have not been incorporated into the Proposed Action or alternatives. If mitigation measures are incorporated into the Proposed Action or alternatives, they are design elements, not mitigation measures. Design elements are those specific means, measures or practices that make up the Proposed Action and alternatives. Standard operating procedures, stipulations, and best management practices are usually considered design elements (43 CFR 46.130(b)).

The EA did not determine that any potential impacts would be considered significant with the implementation of the Proposed Action's design elements including implementation of standard operating procedures, stipulations, and best management practices.

5.0 CUMULATIVE IMPACT

The CEQ regulations define cumulative effects as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such actions" (40 CFR 1508.7). The purpose of cumulative effects analysis is to ensure Federal Responsible Official considers the full range of consequences of the proposed action and alternatives, including the No Action alternative.

The EA determined that there would be no or less than significant impacts on the environment with implementation of the Proposed Action's design elements including implementation of standard operating procedures, stipulations, and best management practices. No cumulative environmental impacts are expected from the lease, construction, and operation of the message

boards. In a cumulative sense, the long-term economic benefits of fees paid to the SIHS will provide ongoing and additional education opportunities for the SIHS students.

6.0 CONSULTATION AND COORDINATION

McKenna et al. completed a Native American Consultation the Native American Heritage Commission, Sacred Land Office as part of the Cultural Resources Investigation for the subject project. The Results of the consultation are included in a report titled *Results of a Class III (NEPA/NHPA) Cultural Resources Investigation for the Proposed Sherman Indian High School Campus Billboard Locations, Riverside, Riverside Co., California* prepared by McKenna et. al. and provided under separate cover.

6.1 LIST OF PREPARERS

An interdisciplinary team contributed to this document, following guidance in Part 1502.6 of CEQ regulations. Preparers, reviewers, consultants and federal officials include the following:

- John Rydzik Bureau of Indian Affairs; Chief, Division of Environmental, Cultural Resources Management & Safety
- Martin Derus President, Lilburn Corporation
- Lorraine Bueno Environmental Analyst, Lilburn Corporation
- Frank Amendola Project Manager, Lilburn Corporation

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