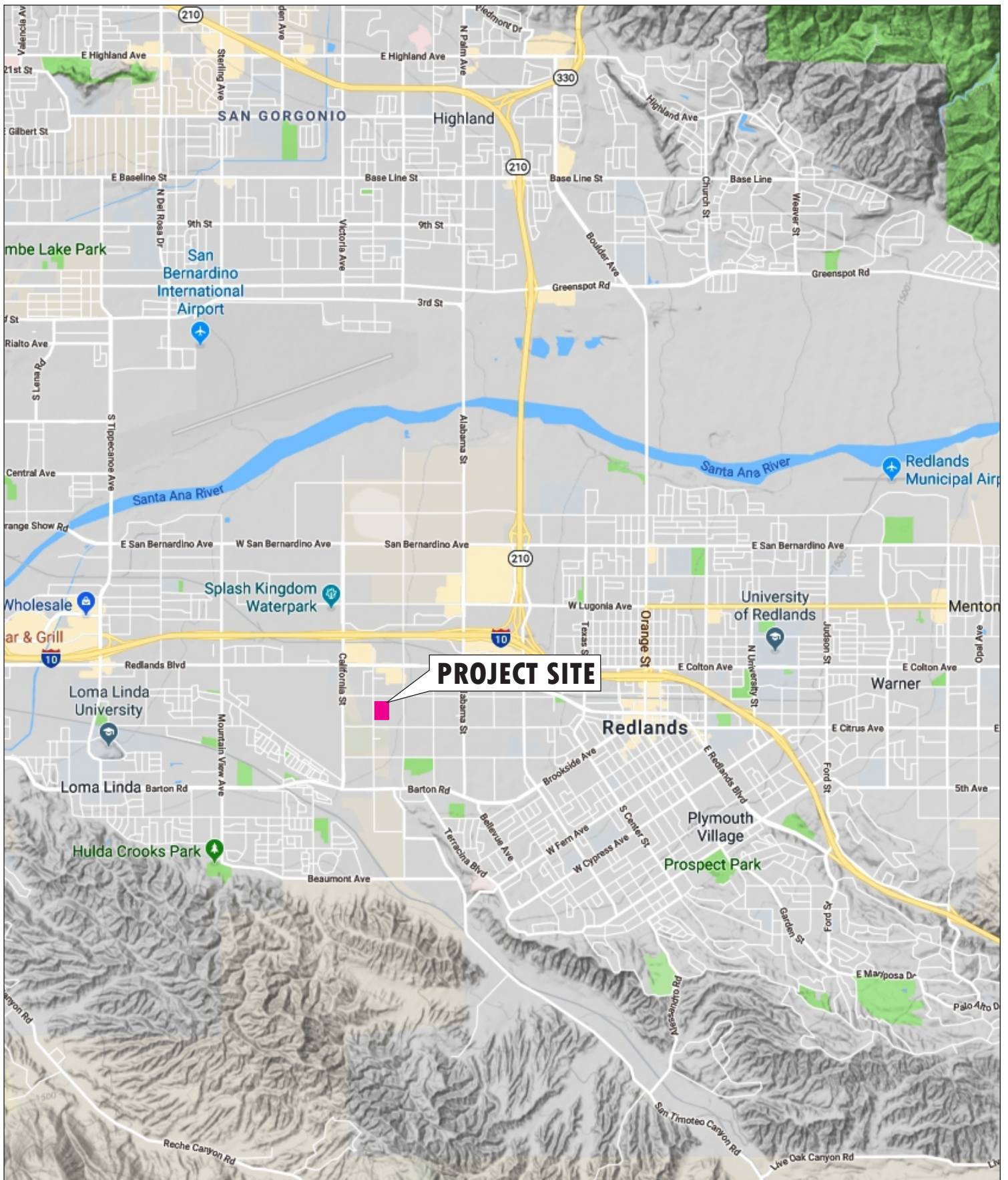


**CITY OF REDLANDS**  
**ENVIRONMENTAL CHECKLIST FORM**  
**AND INITIAL STUDY**

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1. **Project Title:** CRA 912 Proposed Multi-Tenant Industrial Warehouse Project
2. **Lead Agency Name and Address:**  
City of Redlands  
Development Services Department  
35 Cajon Street, Suite 20  
Redlands, CA 92373
3. **Contact Person and Phone Number:**  
Jocelyn Torres  
Assistant Planner  
(909) 798-7555
4. **Project Location:** The 9.01-acre Project Site is located on the east side of New Jersey Street between Park Avenue and Citrus Avenue in the City of Redlands.
5. **Project Sponsor's Name and Address:**  
LDC Industrial Realty, LLC  
555 North El Camino Real, #A456  
San Clemente, CA 92672
6. **General Plan Designation:** Commercial/Industrial
7. **Zoning:** Commercial Industrial District of the East Valley Corridor Specific Plan (EV/IC)
8. **Project Description:** The Applicant (LDC Industrial Realty, LLC) is requesting a Commission Review and Approval (CRA 912) to construct and operate a 179,400 square-foot multi-tenant industrial warehouse, Demolition Permit No. 339 to demolish a single-family residence, and approval of Lot Line Adjustment No. 656 to merge two parcels into one parcel. The Project would occur on a 9.01-acre site located at 10797 New Jersey Street and 10843 New Jersey Street (Assessor's Nos. 0292-154-09, and 21) on the east side on New Jersey Street, south of Park Avenue and north of Citrus Avenue in the City of Redlands (See Figure 1-Regional Location and Figure 2-Project Vicinity). Access to the site would be provided via three driveways along New Jersey Street.

The Proposed Project includes a 179,400 square-foot warehouse building, office space totaling 5,000 square and 19 loading truck docks (See Figure 3 Site Plan). The Project would include approximately 60, 731 square feet of landscaping along the boundaries of the site. The Proposed Project includes a total of 188 parking spaces including 48 compact spaces (8' x 15'), 108 standard spaces (9' x 19'), 10 van Pool/ride share spaces (9' x 19'), seven electric vehicle (EV) spaces (9' x 19'), six clean air/van pool/EV spaces (9' x 19'), two accessible future EV spaces (9' x 19'), one accessible future EV/van space (12' x 19'), four accessible Americans with Disabilities Act (ADA) spaces (9' x 19'), two accessible van (12' x 19'), and 28 trailer spaces (10' x 53').



**REGIONAL LOCATION**  
**New Jersey Street Warehouse Condominiums**  
 City of Redlands, California









The maximum height of the warehouse would not exceed 50 feet. The Proposed Project also includes underground chambers, for the purposes of water quality, to be located within the truck yard area.

9. **Surrounding Land Uses and Setting:** The Project Site is designated Commercial/Industrial as identified in both the City of Redlands' General Plan and the East Valley Corridor Specific Plan. The Commercial/Industrial District allows for auto services, commercial retail and services, and manufacturing. The Proposed Project would be a compatible use in the Commercial/Industrial District of the East Valley Corridor Specific Plan.

The northern parcel (APN No. 0292-154-09) was the former Bracken Bird Farm, which closed in March 2018 and is currently vacant. The southern parcel (0292-154-21) contains a single-family residence.

Surrounding land uses include the Thai Seventh-Day Adventist Church located immediately south of the Project Site, followed by the Orange Blossom Trail; an orange grove and vacant land to the east, commercial/industrial uses to the north, and scattered single-family residences to the west.

10. **Other public agencies whose approval is required:**  
Regional Water Quality Control Board, Santa Ana Region - National Pollution Discharge Elimination System Permit
11. **Related Technical Reports (incorporated by reference):** The technical studies/reports referenced herein and listed in the References section at the end of this Initial Study were used to analyze the Project. All reports are available for review on the City of Redlands website.
12. **Evaluation Format:** This Initial Study was prepared in compliance with the California Environmental Quality Act (CEQA) Guidelines. The format of the study is presented as follows. The project is evaluated based upon 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	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. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
2. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

3. 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 mitigation measures).
4. Significant adverse impacts have been identified or anticipated. An Environmental Impact Report (EIR) is required to evaluate these impacts, which are: (List 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 would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

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

## DETERMINATION

On the basis of this initial evaluation:

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

Signature:   
Community Development Director

Date: 1/13/2020

## **EVALUATION OF ENVIRONMENTAL IMPACTS:**

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



- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
  - a) the significance criteria or threshold, if any, used to evaluate each question; and
  - b) the mitigation measure identified, if any, to reduce the impact to less than significance

## EVALUATION OF ENVIRONMENTAL IMPACTS

Issues:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>I. AESTHETICS.</b> Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial effect on a scenic vista?	( )	( )	( )	(✓)
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway?	( )	( )	( )	(✓)
c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point), If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	( )	( )	(✓)	( )
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	( )	( )	(✓)	( )

### Impact Discussion:

- a/b) **No Impact.** The Project Site is not within a scenic vista/scenic highway corridor as identified by either the State or the City. The Project Site does not contain any notable geological features and does not occur near a designated State Scenic Highway. The nearest designated scenic highway includes a portion of State Route 38, located approximately three miles east of the Project Site. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- c) **Less than Significant Impact.** The Project Site consists of two parcels. The northern parcel, APN: 0292-154-09, is vacant and the southern parcel, APN: 0292-154-21, is developed with a residential structure. Surrounding land uses include the Thai Seventh-Day Adventist Church located immediately south of the Project Site, followed by the Orange Blossom Trail; an orange grove and vacant land to the east, commercial/industrial uses to the north, and scattered single-family residences to the west. Implementation of the Proposed Project would not degrade the visual character of the Project Site or surrounding area as the Project Site and surrounding area occur within the EV/IC zoning district. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.
- d) **Less than Significant Impact.** The Proposed Project would be required to comply with applicable City lighting standards as provided in the East Valley Corridor Specific Plan Section EV4.0215 (Site Lighting). Glare that is anticipated from implementation of the Proposed Project would not be significant due to proposed building materials (i.e., non-reflective concrete tilt-up). The nearest sensitive receptors include four, legal non-

conforming single-family structures located west of New Jersey Street approximately 70 feet from the Project Site. Due to the distance and proposed day time operations, no glare from nighttime lighting would result. Lighting along New Jersey Street would continue to be the major source of lighting for the area at night. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>II. AGRICULTURAL AND FORESTRY RESOURCES.</b> 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?	( )	(✓)	( )	( )
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	( )	( )	( )	(✓)
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))?	( )	( )	( )	(✓)
d) Result in the loss of forest land or conversion of forest land to non-forest use?	( )	( )	( )	(✓)
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?	( )	( )	(✓)	( )



**Impact Discussion:**

- a) **Less Than Significant with Mitigation Incorporated.** The Project Site consists of two parcels. The Project includes a request for a Lot Line Adjustment/Merger to merge the two parcels into one. As shown on Figure 4 Prime Farmland, the northern parcel, APN 0292-154-09, occurs on land designated by the Department of Conservation, Division of Land Resource Protection Farmland Mapping and Monitoring Program as “Urban and Built-Up Land.” The Urban and Built-Up Land designation describes land that is used for residential, industrial, commercial, construction, institutional, public administrative purposes, railroad yards, and other similar uses.

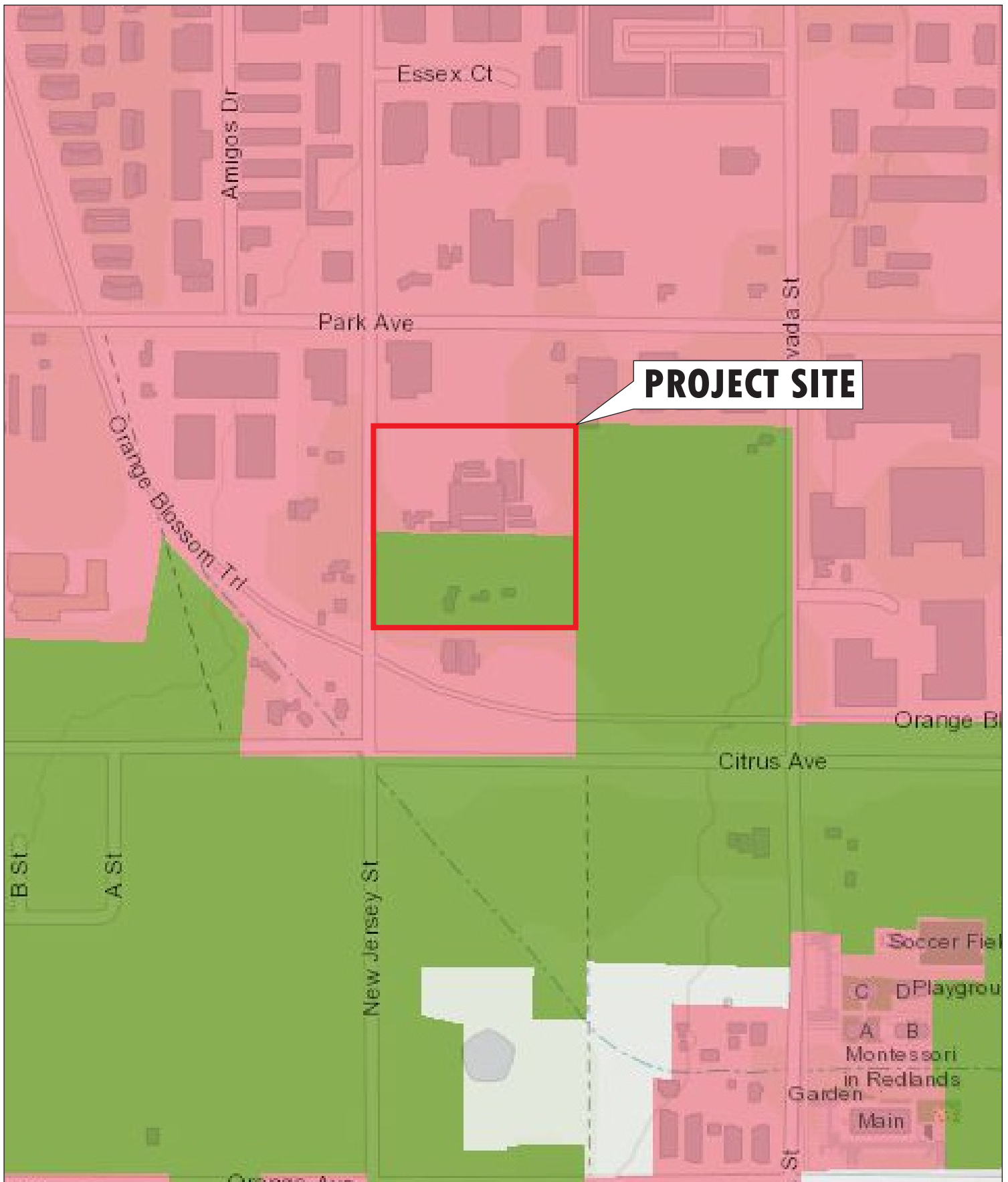
The southern parcel, APN 0292-154-21, occurs on land designated by the Department of Conservation, Division of Land Resource Protection Farmland Mapping and Monitoring Program as “Prime Farmland.” Prime Farmland is land which is known to have the best combination of physical and chemical characteristics for the production of crops. Land with this designation has the soil quality, growing season, and moisture supply needed to produce sustained high yields of crops when treated and managed, including water management, according to current farming methods. The parcel currently contains a single-family residence.

In 1982, under Legislative mandate (Government Code § 65570), the State Department of Conservation (DOC) was required to collect and/or acquire data on lands converted to/from agricultural use. The purpose for collecting such information was to provide decision makers with maps and statistical data on the conversion of farmland and grazing land that would assist in the land use planning process. Important Farmland maps prepared biannually by the DOC Division of Land Resource Protection are heavily based on soil classification data from the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) and water availability determined by the State Department of Water Resources. Utilizing this information, land is classified into one of eight categories (five relating to farming and three associated with nonagricultural purposes) these include: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, Grazing Land, Urban and Built-Up Land, and Other Land.

Most of the 4.17-acre southern parcel, approximately 3.46 acres (or 83 percent of the site), was occupied by citrus groves. According to the United States Department of Agricultural Soil Conservation Service, Soil Survey of San Bernardino County, Southwestern Part, California, on-site soils consist entirely of Hanford Coarse sandy loam (HaC). Soils are placed in grades according to their suitability for general intensive farming as shown by their Storie Index ratings. The soils on the southern parcel is designated as Grade 2 soils indicating that they have a Storie Index rating ranging from 61 to 80. The Storie Index Rating for the soils on the southern parcel of the Project Site is 76. Soils of Grade 2 are good and are well suited to general intensive farming.

**California Land Evaluation and Site Assessment – LESA Model**

One way to assess the level of impact a project may have on agricultural land in the region is to rate the value of the property through use of the California Agricultural Land Evaluation and Site Assessment (LESA) Model. The California Agricultural LESA Model was formulated as a result of Senate Bill 850 (Chapter 812/1993), which charges the State Resources Agency, in consultation with the Governor’s Office of Planning and



Source: <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed 07/07/2020.

#### LEGEND

- Urban and Built-Up Land
- Prime Farmland
- Other Land



## PRIME FARMLAND

### New Jersey Street Warehouse Condominiums

City of Redlands, California

**FIGURE 4**

Research, with developing an amendment to Appendix G of the California Environmental Quality Act (CEQA) Guidelines concerning agricultural lands. Such an amendment is intended “to provide lead agencies with an optional methodology to ensure that significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process” (Public Resources Code Section 21095).

The LESA model rates the relative quality of land resources based on specific, measurable features, following a point-based approach that quantitatively rates the project impacts on a 100-point scale. This method is generally used for rating the relative value of agricultural land resources. The California Agricultural LESA model comprises analysis at two levels:

- *Land Evaluation* – uses two factors, the USDA Land Capability Classification (LCC) and the Storie Index, to analyze soil-based qualities of land as they relate to agricultural suitability.
- *Site Assessment* - evaluates four factors measuring the social, economic, and geographic attributes that contribute to the overall value of agricultural land. These factors assess a project’s size, water resource availability, surrounding agricultural lands, and surrounding protected agricultural lands.

Each of these six factors is separately rated on a 100-point scale. The factors are weighted relative to one another and combined, resulting in a single numeric score for a given project with a maximum attainable score of 100 points. This score becomes the basis for determining the project’s potential significance, based upon a range of established scoring thresholds.

Using the LESA model to assess the value of the southern parcel resulted in a score of 53.95 points (see Table 1). As identified in the California LESA Model Scoring Thresholds, scores between 40 and 59 are considered to be significant only if the Land Evaluation (LE) and Site Assessment (SA) sub-scores are greater than or equal to 20 points. As shown in Table 1 below, the LE sub-score was 41.5 and the SA sub-score was 12.45; therefore, impacts to agricultural lands from implementation of the Proposed Project are considered significant.

A total of approximately 3.46 acres of Prime Farmland would be permanently lost from agricultural production as a result of the Proposed Project. Redlands is known for its historical citrus industry. Citrus farming was Redlands’ original economic base and remains visible today in groves and plantings throughout the Planning Area, packing houses, street and development names, and public art and streetscape elements. In 1996, the Citrus Preservation Commission (CPC) in the City of Redlands was established to make recommendations and advise the City Council regarding the acquisition, improvement, preservation and retention of citrus properties within the City. The amount of land in citrus production has decreased substantially over the years. Today, parcel data shows 1,985 acres of land under citrus cultivation, compared to 4,925 acres in 1991. Of these, 152 acres are owned by the City of Redlands as part of an enterprise operated by the Citrus Preservation Division, in the Facilities and Community Services Department. Policies 2-P.21 to 2-P.23 and 2-A.82 to 2-A.89 in the City’s General Plan address principles and actions for the City to adhere to with regard to citrus grove protection and encouragement of growth throughout the City.



**Table 1**  
**New Jersey Street Warehouse**  
**Final LESA Score Sheet**

<b>Land Evaluation Factors</b>	<b>Factor Score</b>	<b>Factor Weight</b>	<b>Weighted Factor Scores</b>
Land Capability Classification	90	0.25	22.5
Storie Index	76	0.25	19
<b><i>Land Evaluation Subtotal</i></b>		0.50	<b>41.5</b>
<b>Site Assessment Factors</b>			
Project Size	0	0.15	0
Water Resource Availability	83	0.15	12.45
Surrounding Agricultural Land	0	0.15	0
Protected Resource Land	0	0.05	0
<b><i>Site Assessment Subtotal</i></b>		0.50	<b>12.45</b>
<b>Final LESA Score</b>			<b>53.95</b>

Although the Project Site is not located in an area designated for agricultural use as shown on Figure 6-3 of the City's General Plan, implementation of the Proposed Project would convert Prime Farmland to a non-agricultural use.

Where a significant impact has been identified, mitigation measures should attempt to reduce the impact to below a level of significance. CEQA Guidelines define mitigation as: avoidance, minimization of impacts, restoration of the impacted environment, reduction of impacts through preservation and maintenance operations during the project, and compensation through substitute resources or environments. Mitigation measures are required to be undertaken only where such measures are feasible. Mitigation measures are considered "feasible" only if they can be accomplished in a successful manner within a reasonable period of time, taking into account economic, social, and technological factors.

At the direction of the California Department of Conservation Division of Land Resource Protection, agricultural conservation easements on land of at least equal quality and size can mitigate project impacts in accordance with CEQA Guideline § 15370. Additionally, the option of in-lieu of fees as an alternative means of mitigation as long as the fees are used to conserve land of equal size and type, and that the fees charged are adequate to cover the full replacement costs. Possible significant adverse impacts have been identified or anticipated and the following mitigation measure is required as a condition of project approval to reduce the impact to a level below significant. The required mitigation measure is:

**AG 1: Prior to final sign-off of the building permit or issuance of any Certificate of Occupancy, the Developer shall replace, protect or provide a conservation easement for the loss of 4.17 acres of Prime Farmland. At the direction of the City of Redlands, the Project Proponent shall: 1) replace one-acre of Prime Farmland with 0.25 acres of conservation land for any conservation easements located in the City of Redlands, 2) replace one-acre of Prime Farmland with 0.5 acres of conservation land for any conservation easements located outside of Redlands, but within either San Bernardino**

or Riverside counties; or 3) replace one-acre of Prime Farmland with one-acre of conservation land for any conservation easements located elsewhere within the State of California. Based on the current availability of conservation programs, the Project Proponent will contribute monetarily at a 1:1 ratio to the California Farmland Trust, or a similar established conservation program as accepted by the Development Services Director. The trust would be responsible for maintaining conserved farmland in perpetuity. The Developer shall provide satisfactory evidence to the City of Redlands Planning Division that this mitigation has been fore filled.

- b) **No Impact.** The Project Site is not under a Williamson Act Contract as identified in the San Bernardino County Williamson Act FY 2015/2016 Sheet 2 of 2 prepared by the California Department of Conservation, Division of Land Resource Protection. Implementation of the Proposed Project would not conflict with a Williamson Act contract. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- c) **No Impact.** The Project Site is designation Commercial/Industrial and is within a region identified as being "Urban and Built-Up Land." 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)*) would not be impacted by the Proposed Project as no timberland exists in the vicinity and therefore no rezoning from timberland to a non-timberland designation would result. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- d) **Less Than Significant Impact.** The Project Site does not support forest land. Implementation of the Proposed Project would not convert forest land to non-forest use. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- e) **Less Than Significant Impact.** As discussed above, the southern parcel of the Project Site, APN 0292-154-21, occurs on land designated as "Prime Farmland." Most of the 4.17-acre southern parcel, approximately 83 percent of the site, was occupied by citrus groves. Using the LESA model to assess the impacts to Prime Farmland on the Project Site, impacts are considered to be significant. Although the Project Site is not located in an area designated for agricultural use as shown on Figure 6-3 of the City's General Plan, implementation of the Proposed Project would convert Prime Farmland to a non-agricultural use. Implementation of mitigation measure AG-1 would reduce impacts from conversion of farmland to non-agricultural use to a less than significant level. No additional mitigation measures are warranted. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>III. AIR QUALITY.</b> Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	( )	( )	(✓)	( )
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?	( )	( )	(✓)	( )
c) Expose sensitive receptors to substantial pollutant concentrations?	( )	(✓)	( )	( )
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	( )	( )	(✓)	( )

**Impact Discussion:**

- a, b) **Less than Significant Impact.** The Project Site occurs within the South Coast Air Basin (SCAB). The South Coast Air Quality Management District (SCAQMD) has jurisdiction over air quality issues and regulations within the SCAB. The Air Quality Management Plan (AQMP) for the basin establishes a program of rules and regulations administered by SCAQMD to obtain attainment of the State and federal air quality standards. The most recent AQMP (AQMP 2016) was adopted by the SCAQMD on March 3, 2017. The 2016 AQMP incorporates the latest scientific and technological information and planning assumptions, including transportation control measures developed by the Southern California Association of Governments (SCAG) from the 2016 Regional Transportation Plan/Sustainable Communities Strategy, and updated emission inventory methodologies for various source categories.

The Project Site is located within the EV/IC zoning district of the City of Redlands Zoning Map. As demonstrated in Section 18.100.040, Permitted Uses, of the City of Redlands Municipal Code, the Proposed Project is a permitted use within the EV/IC zoning district. The Project Site was developed with residential and related structures, including an orange grove. Therefore, the emissions associated with the Proposed Project have already been accounted for in the AQMP and approval of the Proposed Project would not conflict with the AQMP.

An Air Quality and Greenhouse Gas Impact Analysis was conducted for the Proposed Project by LSA Associates, Inc., dated In April 2020 (all reports are available for review on the City of Redlands website) and is summarized herein. The Proposed Project's demolition, construction and operational emissions were screened using California Emissions Estimator Model (CalEEMod) version 2016.3.2. CalEEMod was utilized to estimate the on-site and off-site construction emissions including the demolition



(approximately 52,000 total square-feet of buildings were analyzed however, approximately 2,200 square feet remains. Therefore, the included analysis reflects a worst case scenario). The emissions incorporate Rule 402 and 403 by default as required during demolition and construction. The criteria pollutants screened for include: volatile organic compounds (VOC), nitrous oxides (NO<sub>x</sub>), carbon monoxide (CO), sulfur oxides (SO<sub>x</sub>), and particulates (PM<sub>10</sub> and PM<sub>2.5</sub>). Two of the analyzed pollutants, VOC and NO<sub>x</sub>, are ozone precursors. The Redlands area is in non-attainment of State and federal standards for Ozone, Carbon Monoxide, Nitrogen Oxides, and Lead.

### Construction Emissions

Demolition and construction emissions are considered short-term, temporary emissions and were modeled with the following construction parameters: demolition, site preparation, site grading (fine and mass grading), building construction, paving, and architectural coating. Construction is anticipated to begin in 2020 and be completed in early 2021. The resulting short-term regional construction emissions generated by the Proposed Project are shown in Table 2.

**Table 2**  
**Construction Emissions Summary**  
**(Pounds per Day)**

Source/Phase	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	Fugitive PM <sub>10</sub>	Exhaust PM <sub>10</sub>	Fugitive PM <sub>2.5</sub>	Exhaust PM <sub>2.5</sub>
Demolition	1.42	35.98	25.92	0.05	1.01	0.93	0.25	0.92
Site Preparation	1.37	33.78	23.62	0.03	4.71	0.94	3.92	0.94
Grading	1.08	26.33	19.54	0.02	1.80	0.77	1.35	0.77
Building Construction	4.26	52.87	42.77	0.08	1.86	1.82	0.50	1.82
Paving	1.76	25.29	22.18	0.03	0.23	0.87	0.07	0.87
Architectural Coating	35.63	2.43	2.82	0.00	0.30	0.10	0.08	0.10
<b>Highest Value (lbs/day)</b>	<b>35.63</b>	<b>52.87</b>	<b>42.77</b>	<b>0.08</b>	<b>4.71</b>		<b>3.92</b>	
SCAQMD Threshold	75.00	100.00	550.00	150.00	150.00		55.00	
<b>Significant</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>		<b>No</b>	

Source: LSA 2020

As shown in Table 2, construction emissions would not exceed SCAQMD thresholds. Impacts would be less than significant.

### Compliance with SCAQMD Rules 402 and 403

Although the Proposed Project does not exceed SCAQMD thresholds for construction emissions, the Project Proponent would be required to comply with all applicable SCAQMD rules and regulations as the SCAB is in non-attainment status for ozone and suspended particulates (PM<sub>10</sub> and PM<sub>2.5</sub>).

The Project Proponent would be required to comply with Rules 402 nuisance, and 403 fugitive dust, which require the implementation of Best Available Control Measures (BACMs) for each fugitive dust source, and the AQMP, which identifies Best Available

Control Technologies (BACTs) for area sources and point sources. The BACMs and BACTs would include, but not be limited to the following:

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.
  - (a) 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 graded shall be watered regularly (two times daily) to ensure that a crust is formed on the ground surface and shall be watered at the end of each workday.
  - (b) The Project Proponent shall ensure that all disturbed areas are treated to prevent erosion until the site is constructed upon.
  - (c) The Project Proponent shall ensure that landscaped areas are installed as soon as possible to reduce the potential for wind erosion.
  - (d) The Project Proponent shall ensure that all grading activities are suspended during first and second stage ozone episodes or when winds exceed 25 miles per hour.

During construction, exhaust emissions from construction vehicles and equipment and fugitive dust generated by equipment traveling over exposed surfaces, would increase NO<sub>x</sub> and PM<sub>10</sub> levels in the area. Although the Proposed Project does not exceed SCAQMD thresholds during construction, the Applicant/Contractor would be required to implement the following conditions as required by SCAQMD:

2. To reduce emissions, all equipment used in grading and construction must be tuned and maintained to the manufacturer's specification to maximize efficient burning of vehicle fuel.
3. The Project Proponent shall ensure that existing power sources are utilized where feasible via temporary power poles to avoid on-site power generation during construction.
4. The Project Proponent shall ensure that construction personnel are informed of ride sharing and transit opportunities.
5. All buildings on the Project Site shall conform to energy use guidelines in Title 24 of the California Administrative Code.
6. The operator shall maintain and effectively utilize and schedule on-site equipment in order to minimize exhaust emissions from truck idling.
7. The operator shall comply with all existing and future California Air Resources Board (CARB) and SCAQMD regulations related to diesel-fueled trucks, 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.

### Operational Emissions

The operational mobile source emissions were calculated using the mobile sources presented in the Traffic Impact Analysis, dated in August 2020, prepared by LSA Associates, Inc. (All reports are available for review on the City of Redlands website). The Traffic Impact Analysis determined that the Proposed Project would generate approximately 1,026 total daily trips. Emissions associated with the operation of the Proposed Project including estimated total daily trips were modeled and are listed in Table 3.

**Table 3**  
**Operational Emissions Summary**  
**(Pounds per Day)**

Source	Pollutant Emissions, lbs/day					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Area	4.07	<0.01	0.05	0.00	<0.01	<0.01
Energy	0.14	1.30	1.09	<0.01	0.10	0.10
Mobile	1.74	40.72	20.30	0.16	8.41	2.40
Offroad	0.52	4.72	4.67	<0.01	0.33	0.31
<b>Totals (lbs/day)</b>	<b>6.47</b>	<b>46.73</b>	<b>26.10</b>	<b>0.17</b>	<b>8.85</b>	<b>2.82</b>
SCAQMD Threshold	55	55	550	150	150	55
<b>Significant</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: LSA 2019

As shown in Table 3, operational emissions would be below SCAQMD thresholds. Impacts are anticipated to be less than significant.

As demonstrated by the CalEEMod model, the Proposed Project would not exceed any applicable SCAQMD regional threshold either during construction or operational activities. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

- c) **Less than Significant with Mitigation Incorporated.** A Health Risk Assessment (HRA), dated in April 2020, was completed by LSA (all reports are available for review on the City of Redlands website), to estimate the increased risk of health effects in people who are exposed to toxic air contaminants (TAC). A HRA combines the results of studies on the health effects of various animal and human exposures to TACs and the level of people's exposure at different distances from the sources of pollutants.

The California Air Resources Board (CARB) developed the *Air Quality and Land Use Handbook: A Community Health Perspective* (CARB Handbook, 2005) and the supplement, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory* (CARB 2017), which are intended to serve as general reference guides for evaluating and reducing air pollution impacts associated with new projects that are part of the land use decision-making process. According to the *CARB Handbook*, recent air pollution studies have shown an association between both respiratory and other noncancer health effects and proximity to high-traffic roadways and facilities with diesel truck use. Other studies have shown that diesel exhaust and other cancer-causing chemicals emitted from cars and trucks are responsible for much of the overall cancer risk from airborne toxics in California. The *CARB Handbook* recommends

planning agencies recognize that the configuration of distribution centers can reduce population exposure and risk.

The Proposed Project consists of the demolition of a single-family residence on the Project Site to allow for the construction and operation of a 179,400 square-foot multi-tenant industrial warehouse. Sensitive receptors are generally categorized as residences, schools, healthcare facilities, and similar uses sensitive to air quality. Surrounding land uses consist of industrial and commercial uses to the north, east, and south, and residential land uses to the west and northwest, with the nearest residential houses located approximately 62 feet to the west. Also, within the vicinity of the Project Site is the Mission Elementary School located approximately 1,740 feet to the northwest, and healthcare facilities located approximately 2,800 feet to the south.

The public's exposure to TACs is a significant environmental health issue in the State of California (State). In 1983, the California Legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health. The California Health and Safety Code defines a TAC as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health." A substance that is listed as a hazardous air pollutant pursuant to subsection (b) of Section 112 of the Federal Act (42 United States Code Section 7412[b]) is a TAC. Under State law, the California Environmental Protection Agency (CalEPA), acting through the CARB, is authorized to identify a substance as a TAC if it determines the substance is an air pollutant that may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health.

California regulates TACs primarily through Assembly Bill (AB) 1807 (Tanner Air Toxics Act) and AB 2588 (Air Toxics "Hot Spot" Information and Assessment Act of 1987). AB 1807 sets forth a formal procedure for the CARB to designate substances as TACs. Once a TAC is identified, the CARB adopts an "airborne toxics control measure" for sources that emit designated TACs. If there is a safe threshold for a substance at which there is no toxic effect, the control measure must reduce exposure to below that threshold. If there is no safe threshold, the measure must incorporate toxics best available control technology (T-BACT) to minimize emissions.

TACs from diesel exhaust contribute to both cancer and non-cancer health risks associated with heavy construction equipment and diesel truck travel activities. Diesel Particulate Matter (DPM) has the greatest cancer risk by far of any TAC emitted from diesel fuel combustion but does not have the greatest non-cancer risk. The only substantial amount of TAC known to be released from the proposed warehouse is contained in the exhaust of project-related vehicles. There are no plans for other toxic substances on site that would result in TAC emissions. Short-term emissions are of concern for analyzing acute health impacts and long-term emissions are of concern for analyzing chronic and carcinogenic health impacts.

Table 4 shows the results of the modeling for carcinogenic and chronic inhalation health risks at the maximum individual sensitive receptor using an air dispersion model from American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD). The model is approved by the Environmental Protection Agency (EPA) for estimating the air quality impacts associated with the volume and line volume sources in elevated terrain. The model was used to calculate the annual average and short duration

pollutant concentrations associated with each emitting source. Emitting sources include the Truck Main Engine and the Transport Refrigeration Unit Engine.

**Table 4**  
**Maximum Long-Term Health Risk Impact from Project Operation**

<b>Risk</b>	<b>Maximum Cancer Risk (risk per million)</b>	<b>Maximum and 8-hour Chronic Risk (Hazard Index<sup>1</sup>)</b>	<b>Maximum Acute Risk (Hazard Index<sup>1</sup>)</b>
<b>SCAQMD Threshold</b>	<b>10.0</b>	<b>1.0</b>	<b>1.0</b>
9-Year Child Exposure	10.6	3.9 x 10 <sup>-3</sup>	2.5 x 10 <sup>-6</sup>
30-Year Residential Exposure	14.6		
<b>Significant?</b>	<b>Yes</b>	<b>No</b>	<b>No</b>

Source: Compiled by LSA (April 2020)

<sup>1</sup> The Hazard Index is the unitless ratio of the estimated long-term level of exposure to a toxic air contaminant for a potential maximum exposed individual to its reference exposure level.

Consistent with the Office of Environmental Health Hazard Assessment (OEHHA) and SCAQMD guidance, the modeling technique used assumes that an adult stays outdoors at his or her residence 24 hours per day for 30 years and a child stays outdoors at his or her residence 24 hours per day for 9 years, which are the State-required periods of time that all HRAs must assess. Results of the analysis indicate that three sensitive receptors would be exposed to an unmitigated inhalation cancer risk of 14.6 in 1 million, which is greater than the threshold of 10 in 1 million. The 9-year child exposure risk levels of 10.6 in a million would be greater than the threshold of 10 in 1 million. Therefore, 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:

- AQ 1: Throughout the life of the Project, all heavy-duty trucks entering the property must meet or exceed 2010 engine emission standards specified in California Code of Regulations Title 13, Article 4.5, Chapter 1, Section 2025. The Facility Operator shall maintain a log of all trucks entering the facility to ensure that on average, the daily truck fleet meets the quantities and emission standards as listed in the code.**
- AQ 2: Throughout the life of the Project, the Facility Operator shall prohibit all vehicles from idling in excess of over five minutes, both on warehouse property and on adjacent streets.**
- AQ 3: Throughout the life of the Project, the facility operator will ensure that on-site staff in charge of keeping the daily log and monitoring for excess idling will be trained/certified in diesel health effects and technologies.**
- AQ 4: The Project Proponent shall ensure that appropriate queuing is provided on-site and that trucks do not stack onto any adjacent roadway.**
- AQ 5: Prior to issuance of occupancy permits, the Project Proponent shall have truck routes clearly marked with trailblazer signs, to ensure that trucks will not enter residential areas. Appropriate signage shall be placed at the project entrance and various visible locations throughout the Project Site.**



With implementation of Mitigation Measures AQ 1 through AQ 5, impacts from TACs through emitting sources would reduce risks below the SCAQMD threshold, as shown in Table 5, below.

**Table 5**  
**Mitigated Maximum Long-Term Health Risk Impact from Project Operation**

Risk	Maximum Cancer Risk (risk per million)	Maximum and 8-hour Chronic Risk (Hazard Index <sup>1</sup> )	Maximum Acute Risk (Hazard Index <sup>1</sup> )
<b>SCAQMD Threshold</b>	<b>10.0</b>	<b>1.0</b>	<b>1.0</b>
9-Year Child Exposure	0.8	3.23 x 10 <sup>-4</sup>	2.46 x 10 <sup>-6</sup>
30-Year Residential Exposure	1.2		
<b>Significant?</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: Compiled by LSA (April 2020)

<sup>1</sup> The Hazard Index is the unitless ratio of the estimated long-term level of exposure to a toxic air contaminant for a potential maximum exposed individual to its reference exposure level.

- d) **Less than Significant Impact.** Potential odor sources associated with the Proposed Project may result from construction activities including equipment exhaust and the application of asphalt and architectural coatings. Operational odor sources would include the temporary storage of domestic solid waste (refuse). Standard construction requirements (i.e., reduced idling, mufflers) would minimize odor impacts resulting from construction activity. It should be noted that any construction odor emissions generated would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction activity. In accordance with the Municipal Code, project-generated refuse would be stored in covered containers and removed at regular intervals. The Proposed Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IV. BIOLOGICAL RESOURCES.</b> Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	( )	(✓)	( )	( )
b) Have a substantial adverse effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	( )	( )	( )	(✓)

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	( )	( )	( )	(✓)
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?	( )	( )	( )	(✓)
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	( )	( )	(✓)	( )
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?	( )	(✓)	( )	( )

**Impact Discussion:**

a, f) **Less than Significant with Mitigation Incorporated.** A Biological Resources Technical Memorandum, dated February 18, 2020, was completed by LSA Associates, Inc. (LSA) (all reports are available for review on the City of Redlands website). A literature review was conducted to assist in determining the existence or potential occurrence of special-status plant and animal species within the Project Site and the Project vicinity. A records search of the California Department of Fish and Wildlife's (CDFW) Natural Diversity Data Base application *Rarefind* 5 online edition (CDFW, 2019) and California Native Plant Society's *Online Inventory of Rare and Endangered Plants* (CNPS, v8-03 0.39) for the Redlands, California, USGS 7.5-minute quadrangle and relevant neighboring quadrangles was conducted on November 7, 2019. Soil information was taken from electronic data provided by Soil Data Mart (Natural Resource Conservation Service [NRCS] 2017). Current and historical aerial photographs were also reviewed in Google Earth (Google Earth 2019) and HistoricAerials.com (NETROnline 2019).

A field survey was conducted on November 13, 2019 to observe the Project Site's general site conditions, the vegetation, potential jurisdictional waters, wildlife species, and the suitability of habitat for various special-status species. During a recent visit, on-site vegetation was observed to be sparse.

Animal species observed included: mourning dove (*Zenaida macroura*), house finch (*Haemorhous mexicanus*), Anna's hummingbird (*Calypte anna*), ruby-crowned kinglet (*Regulus calendula*), California scrub-jay (*Aphelocoma californica*), northern mockingbird (*Mimus polyglottos*), and Botta's pocket gopher (*Thomomys bottae*).

The Project Site does not contain suitable habitat for species protected by the federal Endangered Species Act, the California Endangered Species Act, or the Native Plant

Protection Act. Additionally, the CDFW, USFWS, local agencies, and special-status groups, such as the CNPS, maintain lists of species that they consider to be in need of monitoring. Legal protection for these special-status species varies widely. No other special-status species are expected to occur within the Project Site due to lack of suitable habitat. The Project Site does not lie within any federally designated critical habitat.

The area surrounding the Project Site contains suitable habitat for nesting birds. During the bird breeding season (typically February 1 through September 15), large trees on or adjacent to the project site may be used by hawks, ravens, or other large birds for nesting. Smaller trees, shrubs, and other vegetation may provide nest sites for smaller birds. Nesting bird species, with potential to occur on-site, are protected by California Fish and Game Code Sections 3503, 3503.5, and 3800, and by the Migratory Bird Treaty Act (MBTA) (16 USC 703–711). These laws regulate the take, possession, or destruction of the nest or eggs of any migratory bird or bird of prey. However, the USFWS has recently determined that the MBTA should apply only to “... affirmative actions that have as their purpose the taking or killing of migratory birds, their nests, or their eggs” and will not be applied to incidental take of migratory birds pursuant to otherwise lawful activities. Therefore, possible significant adverse impacts have been identified or anticipated and the following mitigation measure is required as a condition of project approval to reduce these impacts to a level below significant. The required mitigation measure is:

**BIO 1: A nesting bird pre-construction survey shall be conducted by a qualified biologist three days prior to demolition and/or vegetation removal activities. Should nesting birds be found, an exclusionary buffer will be established by the qualified biologist. The buffer may be up to 500 feet in diameter depending on the species of nesting bird found. This buffer will be clearly marked in the field by construction personnel under guidance of the qualified biologist and construction or clearing will not be conducted within this zone until the qualified biologist determines that the young have fled or the nest is no longer active. Nesting bird habitat within the Project Site shall be resurveyed during bird breeding season (February 1 through September 15), and/or if there is a lapse in construction activities longer than seven days.**

- b, c) **No Impact.** The Project Site does not support riparian habitat or a sensitive natural community. The Project Site is not identified in local plans, policies, and regulations of the USFWS or CDFW. Development of the Project Site as proposed would not result in impacts to riparian vegetation or to a sensitive natural community because these resources do not occur on the Project Site.

The Project Site does not support waters or wetland habitat that would come under the jurisdiction of the U.S. Army Corps of Engineers; does not support waters or riparian habitat that would come under the jurisdiction of the Regional Water Quality Control Board (RWQCB), and does not support streams, creeks, washes, or similar waterways, or any riparian habitat what would come under the jurisdiction of CDFW. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

- d) **No Impact.** Wildlife corridors represent areas where wildlife movement is concentrated due to natural or anthropogenic constraints. Local corridors provide access to resources such as food, water, and shelter. Animals use these corridors, which are often hillsides or riparian areas, to move between different habitats. Regional corridors provide these functions and link two or more large habitat areas.

Local wildlife movement would be temporarily disrupted during the vegetation removal and construction processes, but this effect would be localized and short-term. Although the Proposed Project would result in the incremental loss of potential foraging and nesting bird habitat, the Project Site is located in an area that has been regionally isolated by surrounding industrial/commercial development. As concluded in the Biological Resources Technical Memorandum, the Project Site does not provide for regional wildlife movement or serve as a regional wildlife corridor. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

- e) **No Impact.** The Project Site is not located within the boundaries of an adopted natural community conservation plan, habitat conservation plan, or other adopted natural resource protection plan. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact		Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>V. CULTURAL RESOURCES.</b> Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	( )		(✓)	( )	( )
b) Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5?	( )		(✓)	( )	( )
c) Disturb any human remains, including those interred outside of formal cemeteries?	( )		(✓)	( )	( )

**Impact Discussion:**

- a, b) **Less than Significant with Mitigation Incorporated.** Two Cultural Resources Assessments (CRA), both dated in May 2020, were completed by LSA Associates, Inc. (LSA) (all reports are available for review on the City of Redlands website) for each parcel of the Proposed Project. Data from the South Central Coastal Information Center (SCCIC) located at California State University, Fullerton was utilized for the analysis of the Project Site. It included a review of all recorded historic and prehistoric archaeological sites within one mile of the Project Site, as well as a review of known cultural resource surveys and excavation reports. In addition, the California State Historic Property Data File (HPD), which includes the National Register of Historic Places (National Register), California Historical Landmarks (CHL), and California Points of Historical Interest (CPHI), was searched.

LSA completed an intensive pedestrian survey on September 21, 2018 for APN 0292-154-09 (the northern parcel) and on November 5, 2019 for APN 0292-154-21 (the

southern parcel). The purpose of the surveys was to identify and document, prior to the beginning of ground-disturbing activities, any cultural resources and thus also identify any area(s) that might be sensitive for buried cultural resources.

Data from the SCCIC indicated that there have been 93 cultural resource studies previously conducted within one-mile of the northern parcel; none of which included any portion of the parcel. Although no resources have been documented as occurring within the northern parcel, 58 have been recorded within one-mile, including Native American-related sites, historic period foundations and refuse scatters, water conveyance features, landscapes, orchards, and a variety of built environment properties. Several have been evaluated as eligible for the National Register and California Register of Historical Resources (California Register) and are also CHLs or CPHI.

Data from the SCCIC for the southern parcel indicated that there have been 92 cultural resource studies previously conducted within one mile of the southern parcel, none of which included any portion of the parcel. Although no resources have been documented within the southern parcel, 59 have been recorded within one-mile, including Native American-related sites, historic period foundations and refuse scatters, water conveyance features, railroad route and street segments, landscapes, orchards, and a variety of built environment properties.

A historic-period residence was formerly located on the northern parcel, and the parcel were under cultivation for several decades. In addition, six resources related to Native American cultural heritage are recorded within one-mile of the northern parcel.

One historic-period residence was identified and documented in the southern parcel. In addition, several related structures of unknown age were also recorded in addition to a citrus grove. The structure on-site, includes a 1922 one-and-a-half-story residence that features elements of the Victorian, Classical Revival, and Craftsman styles. The residence has sustained several alterations including two additions (north and south ends), replacement of all windows with modern vinyl-framed windows, and installation of nonoriginal doors. In addition to the primary residence, there used to be two garages, a secondary residence, a storage structure, a small metal shed, scattered refuse, remnants of a gravity-flow concrete standpipe irrigation system, and a wind machine tower. All ancillary buildings that were on-site sustained alterations including additions and modern siding and windows.

Based on the research and field survey conducted for the southern parcel, a historical significance evaluation of the residence and related features and the conclusion on whether it qualifies as a "historical resource" as defined by CEQA, was reviewed by LSA. CEQA (PRC Chapter 2.6, Section 21083.2 and CCR Title 145, Chapter 3, Article 5, Section 15064.5) calls for the evaluation and recordation of historical resources. The criteria for determining the significance of impacts to historical resources are based on Section 15064.5 of the *CEQA Guidelines* and *Guidelines for the Nomination of Properties to the California Register*. Properties eligible for listing in the California Register and subject to review under CEQA are those meeting the criteria for listing in the California Register, National Register, or designation under a local ordinance.

The California Register criteria are based on National Register of Historic Places criteria. For a property to be eligible for inclusion in the California Register, one or more of the following criteria must be met:



1. It is associated with the events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
2. It is associated with the lives of persons important to local, California, or national history;
3. It embodies the distinctive characteristics of a type, period, region, or method or construction, or represents the work of a master, or possesses high artistic values; and/or
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the Nation.

In addition to meeting one or more of the above criteria, the California Register requires that sufficient time has passed since a resource's period of significance to "obtain a scholarly perspective on the events or individuals associated with the resource." Fifty years is used as a general estimate of time needed to develop the perspective to understand the resource's significance (CCR 4852 [d][2]).

The California Register also requires that a resource possess integrity, which is defined as "the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance" (California Office of Historic Preservation 1999:2). To retain integrity, a resource should have its original location, design, setting, materials, workmanship, feeling, and association. Determining which of these factors is most important depends on the particular criterion under which the resource is considered eligible for listing (California Office of Historic Preservation 1999).

Based on LSA's evaluation of the residence, the structure does not appear to meet the criteria for listing in the California Register or for designation under the City's ordinance. In addition, the structure does not appear to be part of a potential historic district. The technical memorandums prepared for both parcels, concluded that the parcels have some potential for subsurface resources. Therefore, 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:

**CR-1: Earthmoving activities that occur within the uppermost ten (10) feet of soil shall be monitored by a qualified archaeologist (including initial grubbing and vegetation removal). In the event that archaeological materials are encountered during construction, all construction work shall cease in the immediate area and the qualified archaeologist shall determine the appropriate treatment of the discovery in accordance with California Code of Regulations, Title 14, Chapter 3, Section 15064.5(f)), which determines the significance of impacts to archaeological and historical resources.**

- c) **Less than Significant with Mitigation Incorporated.** Construction activities, particularly grading, could potentially disturb human remains interred outside of a formal cemetery. Therefore, possible significant adverse impacts have been identified or anticipated and the following mitigation measure is required as a condition of project approval to reduce these impacts to a level below significant: The required mitigation measure is:

**CR-2: If human remains or funerary objects are encountered during any activities associated with the project, State Health and Safety Code 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be Native American, the County Coroner will notify the Native American Heritage Commission, which will determine and notify a Most Likely Descendant. With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD will have the opportunity to offer recommendations for the disposition of the remains.**

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VI. ENERGY.</b> Would the project:				
a) Result in potentially significant environment impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	( )	( )	(✓)	( )
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	( )	( )	(✓)	( )

a) **Less than Significant Impact.**

**Electricity:**

Southern California Edison (SCE) provides electricity to the Proposed Project Site. The Project Site is currently occupied with a residential structure. Development of the Proposed Project would continue the demand for electricity when compared to existing conditions. The increased demand is expected to be sufficiently served by the existing SCE electrical facilities. Total electricity demand in SCE's service area is estimated to increase by approximately 12,000 Gigawatt hours (GWh)— between the years 2015 and 2026.

According to the California Energy Commission's Energy Report Generator for the San Bernardino County Planning Area, Non-Residential Sector for the year 2018, the Non-Residential Sector was responsible for 10,189.923519 GWh of electricity consumption in San Bernardino County. The Proposed Project is estimated to consume 3.825312 GWh of electricity annually. The Proposed Project's estimated annual electricity consumption compared to the 2018 annual electricity consumption of the overall Non-Residential Sector in the San Bernardino Planning Area would account for approximately 0.03754 percent of total electricity consumption. Most electrical use at the Proposed Project would be for lighting. The electricity demand from the Proposed Project would therefore represent an insignificant percent of the overall demand in the San Bernardino County

Planning Area. The Proposed Project's electrical demand is not expected to significantly impact SCE's level of service.

The Proposed Project has been designed to comply with the 2019 Building Energy Efficiency Standards. The County of San Bernardino would review and verify that the Proposed Project plans would comply with the most current version of the Building and Energy Efficiency Standards. The Proposed Project would be required to adhere to CALGreen, which establishes planning and design standards for sustainable developments, and energy efficiency. These sustainable features would be incorporated into the Proposed Project which may include high-energy efficiency insulation, wall assemblies and windows to maximize insulation of cool or warm temperature, radiant barrier roof sheathing and energy efficiency heating and cooling systems. The development of the Proposed Project is not anticipated to conflict with achievement of the 60 percent Renewable Portfolio Standard established in the current SB 100. SCE and other electricity retailer's SB 100 goals include that end-user electricity use such as residential and commercial developments use would decrease from current emission estimates. The Proposed Project would not result in a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation would result and no mitigation measures are required.

Natural Gas: The Project Site and surrounding area are serviced by Southern California Gas Company (SoCalGas). The Project Site is currently occupied by residential and related structures. Development of the Proposed Project would continue its demand of natural gas. However, the existing SoCalGas facilities are expected to meet the Project's demand of natural gas. The commercial demand of natural gas is anticipated to decrease from approximately 81 billion cubic feet (bcf) to 65 bcf between the years 2015 to 2035. According to the California Energy Commission's Energy Report Generator for the San Bernardino County Planning Area, Non- Residential Sector from the year 2018, the Non-Residential Sector was responsible for 268.614328 million Therms of natural gas consumption in the San Bernardino County Planning Area. The Proposed Project is estimated to annually consume 0.04824961 million Therms. The Proposed Project's estimated annual natural gas consumption compared to the 2018 annual natural gas consumption of the overall Non-Residential Sector in the San Bernardino County Planning Area would account for approximately 0.017962 percent of total natural gas consumption. Therefore, the natural gas demand from the Proposed Project would represent an insignificant percentage of the overall demand in the San Bernardino County Planning Area. The Proposed Project would not result in a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation and no mitigation measures are recommended.

- b) **Less than Significant Impact.** Project design and operation would comply with the County of San Bernardino Greenhouse Gas Emissions Reduction Plan, and the State Building Energy Efficiency Standards related to appliance efficiency regulations, and green building standards as shown in the response above. Project development would not cause inefficient, wasteful and unnecessary energy consumption, and no adverse impact would occur.

The Proposed Project would not conflict with any applicable plan, policy or regulation of an agency adopted to reduce GHG emissions, including Title 24, AB 32, and SB 32; therefore, the Project is consistent with AB 32, which aims to decrease emissions statewide to 1990 levels by to 2020 as discussed in Sections III and VIII of this

document. The Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VII. GEOLOGY AND SOILS.</b> Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	( )	( )	(✓)	( )
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 waste water 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?	( )	(✓)	( )	( )

**Impact Discussion:**

- a)  
i, ii) **Less than Significant Impact.** A Geotechnical Investigation, dated June 27, 2019, was completed by NorCal Engineering (all reports are available for review on the City of Redlands website) for the southern parcel (APN 0292-154-21) and

another Geotechnical Investigation, dated July 22, 2019, was completed by NorCal Engineering (all reports are available for review on the City of Redlands website) for the northern parcel (APN 0292-154-21) and is summarized herein. As mentioned in the Geotechnical Investigations, the Proposed Project lies outside of any Alquist Priolo Special Studies Zone and the potential for damage due to fault rupture is considered unlikely. Design parameters of the Proposed Project are in accordance with the California Building Code. The San Jacinto (San Bernardino) Fault zone is located approximately 4 kilometers from the Project Site and is capable of producing a Magnitude 6.7 earthquake. Ground shaking originating from earthquakes along other active faults in the region is expected to induce lower horizontal accelerations due to smaller anticipated earthquakes and/or greater distances to other faults. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

- iii) **No Impact.** Liquefaction occurs when vibrations or water pressure within the soil causes the particles to lose contact with one another and behave like a liquid. Younger soils or recent deposits, such as alluvium, are more prone to being unconsolidated than older materials, and therefore are more prone to liquefaction, as are wet soils. As concluded in the Geotechnical Report, the Project Site is not located in an area subject to liquefaction potential. In addition, due to the deep groundwater in the vicinity, liquefaction potential is considered very low. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- iv) **No Impact.** As shown in Figure 7-6 of the City's General Plan, the Project Site does not occur within an area susceptible to landslides. The Project Site is generally flat and no hills occur within the vicinity of the site. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- b) **Less than Significant Impact.** During the development of the Project Site, project-related dust may be generated due to the operation of machinery on-site or due to high winds. Additionally, erosion of soils could occur due to a storm event. Development of the Proposed Project would disturb more than one acre of soil; therefore, the Proposed Project is subject to the requirements of the State Water Resources Control Board General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-2009-DWQ). Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation. The Construction General Permit requires the development and implementation of a Storm Water Pollution and Prevention Plan (SWPPP). The SWPPP must list Best Management Practices (BMPs) to avoid and minimize soil erosion. Adherence to BMPs is anticipated to ensure that the Proposed Project does not result in substantial soil erosion or the loss of topsoil. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.
- c) **Less than Significant Impact.** The Project Site is located on the valley floor and topography at the site and in the vicinity is relatively level, sloping gently to the west. The Project Site elevation ranges between 1,200 and 1,250 feet above mean sea level. As concluded in the Geotechnical Report, based on the review of the County of San Bernardino General Plan Hazard Overlay Maps (2010) (and Figure 7-6 of the City of

Redlands General Plan), the Project Site is not located within an area identified as having a potential for slope instability. The nearest slope to the site occurs approximately 350 feet southwest of the site along an open drainage channel. There are no known areas susceptible to landslides near the site, nor is the site in the path of any known or potential landslides. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

- d) **No Impact.** Expansive soils are composed of fine-grained silts and clays which are subject to swelling and contracting. The amount of swelling and contracting is subject to the amount of fine-grained clay materials present in the soils and the amount of moisture either introduced or extracted from the soils. Expansive soils are divided into five categories ranging from “very low” to “very high.” If the expansion index of the soils on-site is 21 or higher, the soils are considered to be expansive. The classifications of expansive soils are as follows:

Expansion Index	Potential Expansion
0 – 20	Very Low
21 – 50	Low
51 – 90	Medium
91 – 130	High
Above 130	Very High

Table II, Expansion Index Tests, of the Geotechnical Investigation, describes the soils on-site as silty sand with an expansion index of zero. Therefore, the potential expansion of the soil on-site is considered to be very low. No impacts are identified or are anticipated, and no mitigation measures are required.

- e) **No Impact.** The Proposed Project would not require the use of septic tanks or alternative wastewater disposal. City sewer collection lines used for the previous development are available at the Project Site. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- f) **Less Than Significant with Mitigation Implemented.** Soils on-site are defined in the Geotechnical Investigation as silty sand and sandy silt with occasional gravel and roots beneath the upper fill soils. Additionally, discussed in the Cultural Resources Assessments for both project parcels, the soil for both sites are defined as silty alluvium. During field surveys conducted as part of the Geotechnical Investigations, no unique paleontological resource or site, or unique geologic feature was encountered. Although the Project Site does not visibly contain a unique paleontological resource or site or unique geologic feature, grading could expose resources that may exist below the surface. Therefore, 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:

**GEO 1: In the event paleontological resources are discovered on-site, the archeological monitor shall notify a qualified paleontologist to review the**



**findings. All identified and/or recovered paleontological/fossil specimens must be professionally researched, analyzed, reported, and curated in accordance with the San Bernardino County Museum policies and guidelines.**

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VIII. GREENHOUSE GAS EMISSIONS.</b> Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	( )	( )	(✓)	( )
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	( )	( )	(✓)	( )

**Impact Discussion:**

- a) **Less than Significant Impact.** An Air Quality and Greenhouse Gas Impact Analysis, dated April 2020, was prepared by LSA Associates, Inc. (LSA), (all reports are available for review on the City of Redlands website) was prepared for the Project and is summarized herein. Emissions were estimated using the CalEEMod version 2016.3.2. Construction is anticipated to begin in 2020 and be completed in early 2021. Other parameters which are used to estimate construction emissions, such as the worker and vendor trips and trip lengths, utilized the CalEEMod defaults. The operational mobile source emissions were calculated using the Traffic Impact Analysis prepared by LSA Associates, Inc., in August 2020. The Traffic Impact Analysis determined that the Proposed Project would generate approximately 1,026 total daily trips.

Many gases make up the group of pollutants which contribute to global climate change. However, three gases are currently evaluated and represent the highest concentration of GHG: Carbon dioxide (CO<sub>2</sub>), Methane (CH<sub>4</sub>), and Nitrous oxide (N<sub>2</sub>O). SCAQMD provides guidance methods and/or Emission Factors that are used for evaluating a project's emissions in relation to the thresholds. A threshold of 10,000 MTCO<sub>2</sub>E per year has been adopted by SCAQMD for all industrial land uses.

In December 2017, the City of Redlands adopted a Climate Action Plan (CAP) in order to comply with the State's GHG emission reduction standards. As a qualified GHG Reduction Strategy, the CAP provides a streamlined environmental review of future development projects, in accordance with the CEQA. If projects can demonstrate consistency with the CAP, then they are considered less than significant. The modeled emissions anticipated from development and operation of the Proposed Project are shown below in Table 6 and Table 7.

**Table 6**  
**Greenhouse Gas Construction Emissions**  
**(Metric Tons per Year)**

Construction Phase	Peak Annual Emissions (MT/yr)			CO <sub>2</sub> e	Total Emissions per Phase (MT CO <sub>2</sub> e)
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O		
<b>2020</b>	--	--	--	--	<b>484.99</b>
Demolition	44.42	0.01	0	44.68	
Site Preparation	17.60	<0.01	0	17.74	--
Grading	27.54	<0.01	0	27.75	--
Building Construction	363.95	0.06	0	365.52	--
Architectural Coating	1.31	<0.01	0	1.31	--
Paving	27.74	<0.01	0	28.00	--
<b>2021</b>	--	--	--	--	<b>3.85</b>
Site Preparation	0	0	0	0	--
Grading	0	0	0	0	--
Building Construction	0	0	0	0	--
Architectural Coating	3.85	<0.01	0	3.85	--
Paving	0	0	0	0	--
<b>Total Construction Emissions</b>					<b>488.85</b>
<b>Total Construction Emissions Amortized over 30 years</b>					<b>16.29</b>

Source: LSA 2020

**Table 7**  
**Greenhouse Gas Operational Emissions**  
**(Metric Tons per Year)**

Source	Pollutant Emissions (MT/yr)					
	Bio-CO <sub>2</sub>	NBio-CO <sub>2</sub>	Total CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
<b>Construction Emissions Amortized over 30 years</b>	0	16.22	16.22	<0.01	0	16.29
<b>Operational Emissions</b>						
Area	0	0.01	0.01	<0.01	0	0.01
Energy	0	1,129.64	1,129.64	0.06	0.02	1,135.53
Mobile	0	2,438.94	2,438.94	0.12	0	2,441.96
Warehouse Equipment	0	69.83	69.83	0.02	0	70.40
Waste	34.23	0	34.23	2.02	0	84.81
Water	13.16	123.16	136.32	1.36	0.03	180.25
<b>Total Project Emissions</b>	<b>47.39</b>	<b>3,777.80</b>	<b>3,825.19</b>	<b>3.58</b>	<b>0.05</b>	<b>3,929.25</b>

Source: LSA 2020

As shown in Table 7, the Proposed Project would generate 3,929.25 MT CO<sub>2</sub>e per year and would be below the SCAQMD and CAP threshold of 10,000 MTCO<sub>2</sub>E per year. Thus, the Project would comply with the City of Redlands's CAP. The largest contributors to the total GHG Emissions would be from off-site power plants providing electricity to the Proposed Project. The electricity would provide power for building heating, cooling, refrigeration, office equipment, and lighting for the multi-tenant warehouse. Since the Project would be below SCAQMD and CAP thresholds, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

- b) **Less than Significant Impact.** The Redlands CAP's GHG emission targets and goals are based on meeting the goals in Executive Order B-30-15 and SB 32 and following the CAP guidelines established in the CARB 2017 Scoping Plan. The CAP includes emissions targets of 6.0 MT CO<sub>2</sub>e per capita per year for 2030 and 5.0 MT CO<sub>2</sub>e per capita per year 2035.

The SCAQMD's thresholds used Executive Order S-3-05 goals as the basis for deriving the screening level. In June 2005, the California issued Executive Order S-3-05, GHG Emissions, and established the following reduction targets:

- 2010: Reduce greenhouse gas emissions to 2000 levels.
- 2020: Reduce greenhouse gas emissions to 1990 levels.
- 2050: Reduce greenhouse gas emissions to 80 percent below 1990 levels.

In 2006, the California State Legislature adopted AB 32 the California Global Warming Solutions Act of 2006. AB 32 requires CARB to adopt rules and regulations that would achieve GHG emissions equivalent to statewide levels in 1990 by 2020 through and enforceable statewide emission cap, which was phased in starting in 2012. Therefore, as the Project's emissions meet the threshold for compliance with Executive Order S-3-05, the Project's emissions would also comply with the goals of AB 32. Additionally, as the Project meets the current interim emissions targets/thresholds established by SCAQMD, the Project would also be on track to meet the reduction target of 40 percent below 1990 levels by 2030 mandated by EO-B-30-15 and SB 32. Furthermore, all the post-2020 reductions in GHG emissions are addressed via regulatory requirements at the State level and the Project would be required to comply with these regulations as they come into effect.

Industrial Warehouse land uses must comply with the reduction goals of the City of Redlands CAP, AB 32, and SB 32. Furthermore, the Project would comply with applicable Green Building Standards Title 24 codes and City of Redlands CAP measures. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IX. HAZARDS AND WASTE MATERIALS.</b> Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	( )	( )	(✓)	( )
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?	( )	( )	(✓)	( )

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	( )	( )	(✓)	( )
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?	( )	( )	( )	(✓)
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?	( )	( )	( )	(✓)
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	( )	( )	( )	(✓)
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	( )	( )	( )	(✓)

**Impact Discussion:**

- a, b) **Less than Significant Impact.** The specific business or tenant that would occupy the proposed warehouse is not known at this time. Potential hazardous materials used by the future tenants at the Project Site could include chemical reagents, solvents, fuels, paints, and cleansers. Businesses that handle one or more regulated substances in a process in excess of the threshold quantities as listed in California Code of Regulations (CCR) Title 19, Division 2, Chapter 4.5, Section 2770.5, must register activities in accordance with CCR Title 19, Division 2, Chapter 4.5, Sections 2735.1 through 2785.1. Potential on-site uses could also generate hazardous byproducts that must be handled and disposed of as hazardous materials. If businesses that use or store hazardous materials occupy the Project Site, the business owner and operator would be required to comply with all applicable federal, State, and local regulations including cooperation with the Certified Unified Program Agency (CUPA) with Hazardous Materials Division of the San Bernardino County Fire Department. As part of the CUPA process, in accordance with CCR, Title 19, Public Safety, Division 2 California Governor's Office of Emergency Services, Chapter 4.5 California Accidental Release Prevention Program Detailed Analysis, Article 4, Hazard Assessment, Section 2750.5 Defining Offsite Impacts to the Population, the owner or operator would be required to identify the presence of institutions (schools, hospitals, long-term health care facilities, child day care facilities, prisons) parks and recreation areas, and major commercial, office and industrial buildings in the Environmental Protection Agency (EPA) Risk Management Plan (RMP). In addition, the future tenants of the warehouse would be required to submit a California Accidental Release Prevention Program (CALARP) Stationary Source Registration

Form. The San Bernardino County Fire Department – Hazardous Materials Division requires businesses involved in hazardous materials activity to submit business information electronically into the California Environmental Reporting System (CERS).

The Proposed Project includes the demolition of an approximately 2,200 square-foot existing residential structure. Issuance of a demolition permit may require possible asbestos/lead paint inspections. Demolition of the existing structure shall be in accordance with applicable State and local regulations. Hazardous or toxic materials transported in association with construction of the Proposed Project may include items such as oils, paints, and fuels. All materials required during construction would be kept in compliance with State and local regulations. With implementation of Best Management Practices (BMPs) and compliance with all applicable regulations, potential impacts from the use of hazardous materials during construction and operation or release of hazardous materials during demolition would be considered less than significant. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

- c) **Less than Significant Impact.** Schools that are within a one-quarter mile from the Project Site include Citrus Valley Christian Academy, located approximately 0.16 miles northwest, Barbara Phelps Community School at 1812 West Park Ave, approximately 0.19 miles to the northeast, and Benchmark Young Adult School, located approximately 0.23 miles to the north. As described in Section IX (a, b) above, the specific businesses or tenants that would occupy the buildings are not known at this time. However, implementation of BMPs and compliance with applicable regulations would ensure potential impacts associated with the release of hazardous materials would be less than significant. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.
- d) **No Impact.** The Project Site is not on a list of hazardous materials sites per the EnviroStor interactive database map (accessed May 26, 2020). No significant hazard to the public or the environment is anticipated. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- e) **No Impact.** The Project Site is not located within the vicinity of an airport or private airstrip. The nearest airport to the Project Site is the Redlands Municipal Airport, located approximately 4.6 miles northeast of the Project Site. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- f) **No Impact.** The Project Site does not contain any emergency facilities, nor do streets adjacent to the site serve as emergency evacuation routes. During construction and long-term operation, the contractor would be required to maintain adequate emergency access for emergency vehicles as required by the City. The Proposed Project would not interfere with an adopted emergency response or evacuation plan; therefore, no impacts are identified or are anticipated and no mitigation measures are required.
- g) **No Impact.** As shown in Figure 7-4: Fire Hazards, of the City of Redlands' General Plan, the Project Site does not occur in an area associated with the risk of wildland fire. The Project Site occurs in a predominantly developed area and no wildlands are located on or adjacent to the Project Site. The Proposed Project would not expose people or structures to significant risk or loss, injury, or death involving wildland fires. Therefore, no impacts are identified or are anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>X. HYDROLOGY AND WATER QUALITY.</b> Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	( )	( )	(✓)	( )
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	( )	( )	(✓)	( )
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;	( )	( )	(✓)	( )
(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; or	( )	( )	(✓)	( )
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	( )	( )	(✓)	( )
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	( )	( )	(✓)	( )

**Impact Discussion:**

- a, e) **Less than Significant Impact.** Preparation and grading of the Project Site would disturb an area greater than one-acre and therefore is subject to the National Pollution Discharge Elimination System (NPDES) permit requirements. Construction activities covered under the State of California's General Construction permit include removal of vegetation, grading, excavating, or any other activities that causes the disturbance of one acre or more. The General Construction permit requires recipients to reduce or eliminate non-storm water discharges into stormwater systems, and to develop and implement a Storm Water Pollution Prevention Plan (SWPPP). The purpose of the SWPPP is to: 1) identify pollutant sources that may affect the quality of discharges of stormwater associated with construction activities; and 2) identify, construct, and



implement stormwater pollution control measures to reduce pollutants in stormwater discharges from the construction site during and after construction.

The NPDES also requires a Water Quality Management Plan (WQMP). To comply with the requirements of the City of Redlands and the NPDES Areawide Stormwater Program, a WQMP, dated in February 2020, was prepared by Thienes Engineering, Inc. (all reports are available for review on the City of Redlands website) for the Proposed Project and is summarized herein. Mandatory compliance with the Proposed Project's WQMP, in addition to compliance with NPDES Permit requirements, would ensure that all potential pollutants of concern are minimized or otherwise appropriately treated prior to being discharged from the Project Site. Therefore, implementation of the Proposed Project would not violate any water quality standards or waste discharge requirements. No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

- b) **Less than Significant Impact.** The Proposed Project is not anticipated to substantially impact groundwater supplies or to substantially interfere with groundwater recharge. The Proposed Project does not include groundwater wells that would impact the production rate of any nearby pre-existing wells. Therefore, no significant impacts are identified or anticipated and no mitigation measures are required.
- c) **Less than Significant Impact.** The Project Site is developed with a single-family residence located on the southern parcel. In its existing condition, runoff from the site sheet flows westerly and outlets onto New Jersey Street. New Jersey Street conveys the water north to Park Avenue and Park Avenue conveys the water west to the Mill Creek Zanja approximately 350 feet west of the Project Site. The Proposed Project poses no substantial change in the existing flows on- or off-site. The WQMP requires an Erosion Control Plan and necessary actions to avoid excessive run-off in the event of rainfall. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.
  - i) **Less than Significant Impact.** Erosion is the process by which material is removed from the Earth's surface most commonly by wind or water. Erosion is more likely if soils are left unprotected. The Proposed Project would include buildings, hardscaping and landscaping. The Project Site is currently developed with existing structures, landscaping and paved surfaces (i.e., parking lot, drive aisles and walkways). The hazard of soil erosion would be reduced after construction is complete. Furthermore, the Proposed Project is subject to the requirements of the State Water Resources Control Board General Permit for Discharges of Storm Water Associated with Construction Activity. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation. The Construction General Permit requires the development and implementation of a SWPPP. The SWPPP must list BMPs to avoid and minimize soil erosion. Adherence to BMPs is anticipated to ensure that the Proposed Project does not result in substantial erosion or siltation on- or off-site. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.
  - ii-iii) **Less than Significant Impact.** Review of FEMA Map Number 06071C8711H, dated August 28, 2008, shows that the majority of the Project Site is located in

FEMA Flood Zone AO with a flood depth of two feet. The remaining portion of the Project Site occur within Zone X which is an area of minimal flood hazard. FEMA defines Zone AO as “areas subject to inundation by one-percent-annual-chance flooding (usually sheet flow on sloping terrain) where average depths are between one and three feet.” Runoff from the north sheet flows across the Project Site to New Jersey Street. As mentioned above, New Jersey Street conveys the water north to Park Avenue and Park Avenue conveys the water west to the Mill Creek Zanja.

In order to develop the site, potential impacts of a regional flood need to be mitigated. To mitigate the existing Flood Zone AO two-foot depth, the site would be required to meet the FEMA guidelines as well as flood zone guidelines established by the City of Redlands.

FEMA would require that the Lowest Adjacent Grade (LAG) to be at or above the Base Flood Elevation (BFE). The City of Redlands would require that the lowest floor, including basement, be elevated above the highest adjacent grade to a height exceeding the depth number specified in feet on the Flood Insurance Rate Map (FIRM) by at least two feet, or be flood proofed so that the base flood level would be watertight with walls substantially impermeable to the passage of water, have structural components capable of resisting hydrostatic and hydrodynamic loads and effects of buoyancy.

To meet these requirements, the finish floor of the Building would be constructed with the finish floor at four feet above the highest adjacent existing grade. On the westerly side of the building and the north, east, and south sides of the building would be flood proofed to a point on the building that is four feet above the highest adjacent grade on the easterly side of the building.

As developed, runoff from the westerly vehicle parking area, the building roof, and the truck yard would drain to catch basins. The catch basins located in the truck yard would have a low flow pipe that would drain into the underground chambers. The catch basin located near the northwest corner of the Project Site would have a pipe that flows easterly towards the diversion manhole (with flap gate) and the high flows would be directed towards a parkway drain onto New Jersey Street. From the diversion manhole, the low flows would be conveyed to the underground chambers via a low flow pipe. Catch basins along the western boundary of the Project Site would have a low flow pipe flowing southerly towards another diversion manhole with flap gate. High flow pipes from these catch basins would be routed to parkway drains that would drain onto New Jersey Street. Once the design capture volume (DCV) is met and the chambers are full, all higher flows would be routed to a parkway culvert. Once the stormwater ponds a certain elevation, stormwater would discharge the site via the proposed parkway drain onto New Jersey Street. As proposed, the drainage system would ensure that the Proposed Project would not increase the rate or amount of surface runoff from the site, create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or redirect flows. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

- d) **Less than Significant Impact.** The Project Site is not located in a Dam Inundation Area. However, according to Figure 7-3 of the City's General Plan and Flood Insurance Rate Map 06071C8711H prepared by FEMA, the majority of the Project Site occurs within a 100-year flood plain. The remaining portion of the Project Site occurs within Zone X which is an area of minimal flood hazard. With implementation of the proposed drainage system (as discussed in response c) ii-iv above) potential flood hazards would be reduced to a less than significant level. The Project Site does not occur in a known tsunami or seiche zone as shown in the San Bernardino County Hazard Overlay Map FH31 B. No significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XI. LAND USE AND PLANNING.</b> Would the project:				
a) Physically divide an established community?	( )	( )	( )	(✓)
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?	( )	( )	( )	(✓)

**Impact Discussion:**

- a, b) **No Impact.** The Proposed Project includes the construction of a 179,400 square-foot multi-tenant industrial warehouse. The Proposed Project does not propose construction of any new roadways, flood control channels, or other structures that would physically divide an established community. The Project Site is designated Commercial/Industrial by the City's General Plan and is zoned EV/IC. Uses permitted in this designation include auto services, commercial retail and services, manufacturing, and similar uses. The Proposed Project complies with the City's land use goals for the Project Site and does not conflict with any other policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XII. MINERAL RESOURCES.</b> Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	( )	( )	( )	(✓)
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?	( )	( )	( )	(✓)

**Impact Discussion:**

- a, b) **No Impact.** As shown in Figure 6-4 of the City's General Plan, the Project Site occurs in an area identified as Mineral Resource Zone 1 (MRZ-1). Areas identified as MRZ-1 include areas where available geologic information indicates that the likelihood of significant mineral resources to occur is minimal. The Project Site is currently developed and has no known mineral resources. Based on the surrounding land uses and the Project Site's land use designation, the site would not be suitable for mining operations. The Proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<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?	( )	( )	(✓)	( )
b) Generation of excessive groundborne vibration or groundborne noise levels?	( )	( )	(✓)	( )
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?	( )	( )	( )	(✓)

**Impact Discussion:**

- a) **Less than Significant Impact.** A Noise Impact Analysis (NIA), dated November 9, 2020, was completed by Urban Crossroads (all reports are available for review on the City of Redlands website), to determine the potential noise impacts and the necessary noise mitigation measures, if any, for the Proposed Project. Noise is measured in the form of a decibel (dB), which is a unit for describing the amplitude of sound. The predominant rating scales for noise in the State of California are the Equivalent-Continuous Sound Level ( $L_{eq}$ ), and the Community Noise Equivalent Level (CNEL), which are both based on the A-weighted decibel (dBA). The  $L_{eq}$  is defined as the total sound energy of time-varying noise over a sample period. The CNEL is defined as time-varying noise over a 24-hour period with a weighted factor of 5 dBA applied to the hourly  $L_{eq}$  for noise occurring from 7:00 p.m. to 10:00 p.m. (defined as relaxation hours) and 10 dBA applied to events occurring between (10:00 p.m. and 7:00 a.m. defined as sleeping hours). The State of California's Office of Noise Control has established standards and guidelines for acceptable community noise levels based on the CNEL and  $L_{dn}$  rating scales. The

purpose of these standards and guidelines is to provide a framework for setting local standards for human exposure to noise.

According to the City of Redlands General Plan, the most significant noise levels in the City occur near transportation corridors including roadways, the airport, and railways. Acceptable noise ranges are provided in General Plan Table 7-10, Noise/Land Use Compatibility Matrix and Interpretation, and are listed by land use category. Normally acceptable noise ranges for Commercial/Industrial land uses range from 75 dBA CNEL to 85 dBA CNEL. Conditionally acceptable noise levels, for new development and only after detailed analysis of noise reduction requirements are made, may be as high as 90 dBA CNEL.

Noise level increases resulting from the Project were evaluated based on the Appendix G CEQA Guidelines at the nearest sensitive receiver locations. The existing noise-sensitive land uses in the vicinity of the Project Site are described below:

- R1: Location R1 represents the existing legal, non-conforming residence at 1941 West Park Avenue, approximately 188 feet north of the Project Site. R1 is placed at the private outdoor living area (backyard) facing the Project site. A 24-hour noise measurement was taken near this location, L1, to describe the existing ambient noise environment.
- R2: Location R2 represents the Barbara Phelps Community School at 1812 West Park Ave, approximately 1,019 feet northeast of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receiver R2 is placed at the building façade. A 24-hour noise measurement was taken near this location, L2, to describe the existing ambient noise environment.
- R3: Location R3 represents the Breakthrough Chapel International at Nevada Street, approximately 721 feet east of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receiver R3 is placed at the building façade. A 24-hour noise measurement near this location, L3, is used to describe the existing ambient noise environment.
- R4: Location R4 represents the Thai Seventh-Day Adventist Church at 10855 New Jersey Street, approximately 17 feet south of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receiver R4 is placed at the residential building façade. A 24-hour noise measurement near this location, L4, is used to describe the existing ambient noise environment.
- R5: Location R5 represents the existing legal, non-conforming residence at 10820 New Jersey Street, approximately 98 feet west of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receiver R5 is placed at the residential building façade. A 24-hour noise measurement near this location, L5, is used to describe the existing ambient noise environment.

Noise impacts and significant criteria as listed in Table 8, shall be considered significant if any of the following occur as a direct result of the Proposed Project:

**Table 8**  
**Significance Criteria Summary**

Analysis	Affected GP Land Use <sup>2</sup>	Condition(s)	Significance Criteria	
			Daytime	Nighttime
Off-Site Traffic <sup>1</sup>	Residential	If ambient ≥ 60 dBA CNEL	≥ 4 dBA CNEL Project increase	
	Comm./Industrial	If ambient ≥ 75 dBA CNEL		
	All	Any ambient CNEL	≥ 6 dBA CNEL Project increase	
Operational	All	Exterior Noise Level Standards	See Table 3-1	
	Residential	If ambient ≥ 60 dBA L <sub>eq</sub>	≥ 4 dBA L <sub>eq</sub> Project increase	
	Comm./Industrial	If ambient ≥ 75 dBA L <sub>eq</sub>		
	All	Any ambient L <sub>eq</sub>	≥ 6 dBA L <sub>eq</sub> Project increase	
Construction	All	Permitted hours between 7:00 a.m. to 6:00 p.m. except Sundays or federal holidays. <sup>3</sup>		
		Noise Level Threshold <sup>4</sup>	80 dBA L <sub>eq</sub>	n/a
		Vibration Level Threshold <sup>5</sup>	0.01 in/sec RMS	n/a

Source: Noise Impact Analysis 2020

<sup>1</sup> City of Redlands General Plan Noise/Land Use Compatibility Matrix and Interpretation.

<sup>2</sup> City of Redlands General Plan Land Use Map (December 5, 2017)

<sup>3</sup> City of Redlands Municipal Code, Section 8.06.090 (F).

<sup>4</sup> Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual.

<sup>5</sup> City of Redlands Municipal Code, Section 8.06.020.

"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.; "RMS" = Root-mean-square.

### Existing

To assess the existing noise level environment, 24-hour noise level measurements were taken at the five sensitive receiver locations described above in the Project study area. The collected measurements resulted in the highest overall 24-hour exterior noise level measurement recorded at 65.1 dBA CNEL and the lowest recorded at 56.2 dBA CNEL. The background ambient noise levels in the Project study area are dominated by the transportation-related noise associated with surface streets. This includes both auto and heavy truck activities.

### Construction

Noise from construction activities are typically limited to the hours of operation established under a jurisdiction's Municipal Code. Section 8.06.090(F) of the City of Redlands Municipal Code indicates that construction activity is considered exempt from the noise level standards between the hours of 7:00 a.m. to 6:00 p.m. Monday to Saturdays; with no activity allowed on Sundays or holidays. However, neither the City of Redlands General Plan nor Municipal Code has established numeric maximum acceptable construction source noise levels at potentially affected receivers. Therefore, a numerical construction threshold based on Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual* was used for the analysis of daytime construction impacts. The FTA considers a daytime exterior construction noise level of 80 dBA  $L_{eq}$  as a reasonable threshold for noise sensitive receivers.

Noise generated by the Project construction equipment would include a combination of trucks, power tools, concrete mixers, and portable generators operating simultaneously that when combined can reach high levels. To assess the worst-case construction noise levels, the Project construction noise analysis relies on the highest noise level impacts when the equipment with the highest reference noise level is operating at the closest point from the edge of primary construction activity (Project site boundary) to each receiver location. The construction noise levels are expected to range from 51.5 to 76.4 dBA  $L_{eq}$ , and the highest construction levels are expected to range from 61.6 to 76.4 dBA  $L_{eq}$  at the nearby sensitive receiver locations. The construction noise analysis shows that the nearest sensitive receiver locations would satisfy the reasonable daytime 80 dBA  $L_{eq}$  significance threshold during Project construction activities.

### Operational

The City of Redlands Municipal Code, Chapter 8.06 establishes the noise level standards for stationary noise sources. The Project's industrial land use would potentially impact nearby non-conforming noise-sensitive uses in the Project study area. For the non-conforming noise-sensitive residential uses in the Project study area, Section 8.06.070 identifies the base exterior noise level standard of 60 dBA  $L_{eq}$  during the daytime hours (7:00 a.m. to 10:00 p.m.) and 50 dBA  $L_{eq}$  during the nighttime hours (10:00 p.m. to 7:00 a.m.).

Using the reference noise levels to represent the Proposed Project operations that include loading dock activity, entry gate and truck movements, roof-top air conditioning units, and trash enclosure activity, the analysis calculated the operational source noise levels that are expected to be generated at the Project site and the Project-related noise level increases that would be experienced at each of the sensitive receiver locations. The daytime hourly noise levels at the sensitive receiver locations are expected to range from 38.5 to 51.6 dBA  $L_{eq}$ . The nighttime hourly noise levels at the off-site receiver locations are expected to range from 37.6 to 49.7 dBA  $L_{eq}$ . The operational noise levels associated with the Proposed Project are expected to satisfy the City of Redlands 60 dBA  $L_{eq}$  daytime and 50 dBA  $L_{eq}$  nighttime exterior noise level standards at all nearby receiver locations.

Off-site noise levels generated from the development of the Proposed Project were observed by measurements taken at seven off-site roadway parameters including:

- California Street – North of Redlands Boulevard (Segment 1)
- New Jersey Street – South of Redlands Boulevard (Segment 2)
- New Jersey Street – South of Park Avenue (Segment 3)
- New Jersey Street – South of Driveway 3 (Segment 4)
- Redlands Boulevard – East of California Street (Segment 5)
- Redlands Boulevard – West of New Jersey Street (Segment 6)
- Park Avenue – East of New Jersey Street (Segment 7)

To quantify the off-site noise levels, the Project-related truck trips were added to the NIA's heavy truck category in their noise prediction level for worse-case off-site impacts.

The addition of the Project related truck trips increases the percentage of heavy trucks in the vehicle mix. Table 9 shows that the Project off-site traffic noise level increase would range from 0.0 to 4.1 dBA CNEL.

**Table 9**  
**Existing with Project traffic noise Level Increases**

ID	Road	Segment	Receiving Land Use <sup>1</sup>	CNEL at Receiving Land Use (dBA) <sup>2</sup>			General Plan <sup>3</sup>	Incremental Noise Level Increase Threshold	
				No Project	With Project	Project Addition		Limit <sup>4</sup>	Exceeded <sup>5</sup>
1	California St.	n/o Redlands Blvd.	Commercial/Industrial	68.2	69.9	1.7	75	n/a	No
2	New Jersey St.	s/o Redlands Blvd.	Commercial/Industrial	70.6	73.3	2.7	75	n/a	No
3	New Jersey St.	s/o Park Ave.	Commercial/Industrial	67.1	71.8	4.7	75	n/a	No
4	New Jersey St.	s/o Dwy. 3	Commercial/Industrial	70.6	70.6	0.0	75	n/a	No
5	Redlands Blvd.	e/o California St.	Comm./High-Density Residential	70.3	71.6	1.3	60	4.0	No
6	Redlands Blvd.	w/o New Jersey St.	Commercial	69.5	69.5	0.0	75	n/a	No
7	Park Av.	e/o New Jersey St.	Commercial/Industrial	63.5	63.5	0.0	75	n/a	No

Source: Noise Impact Analysis 2020

<sup>1</sup> Based on a review of existing aerial imagery. Noise sensitive uses limited to existing residential land uses.

<sup>2</sup> The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.

<sup>3</sup> Clearly compatible noise exposure level by affected land use (City of Redlands General Plan Noise/Land Use Compatibility Matrix and Interpretation Exhibit 3-A).

<sup>4</sup> Incremental noise level increase threshold limits outlined on Table 4-1 of the Noise Impact Analysis. "n/a" = Not Applicable; ambient (no project) noise levels do not exceed the clearly compatible noise exposure level by affected land use.

<sup>5</sup> Does the Project create an incremental noise level increase exceeding the significance criteria (Table 4-1 of the Noise Impact Analysis)?

Based on the significance criteria for off-site traffic noise presented in Table 9, the affected General Plan land uses adjacent to the study area roadway segments would experience less than significant noise level impacts. No significant adverse impacts are identified or anticipated and no mitigation measures are required.

- b) **Less than Significant Impact.** Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. It is expected that ground-borne vibration from Project construction activities would cause only intermittent, localized intrusion. Ground-borne vibration levels resulting from typical construction activities occurring within the Project Site were estimated by data published by the FTA. The City of Redlands Municipal Code, Section 8.06.020, defines the vibration perception threshold as 0.01 inches per second (in/sec) root-mean-square (RMS). As such, the NIA used the City of Redlands Municipal Code vibration perception threshold of 0.01 in/sec RMS to assess the potential vibration impacts due to Project construction. Ground vibration levels associated with various types of construction equipment are summarized in Table 10.



**Table 10**  
**Vibration Source Levels for Construction Equipment**

Equipment	PPV (in/sec) at 25 feet
Small bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076
Large bulldozer	0.089

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual

Table 11, below, presents the expected unmitigated Project-related vibration levels at each of the sensitive receiver locations.

**Table 11**  
**Unmitigated Project Construction Vibration Levels**

Receiver <sup>1</sup>	Distance to Const. Activity (Feet)	Receiver Levels (in/sec) PPV <sup>2</sup>					Velocity Levels (in/sec) RMS <sup>3</sup>	Threshold (in/sec) RMS <sup>4</sup>	Threshold Exceeded? <sup>5</sup>
		Small Bulldozer	Jack-hammer	Loaded Trucks	Large Bulldozer	Peak Vibration			
R1	188'	0.0001	0.0017	0.0037	0.0043	0.0043	0.0031	0.01	No
R2	1,019'	0.0000	0.0001	0.0003	0.0003	0.0003	0.0002	0.01	No
R3	721'	0.0000	0.0002	0.0005	0.0006	0.0006	0.0004	0.01	No
R4	17'	0.0054	0.0624	0.1355	0.1587	0.1587	0.1127	0.01	Yes
R5	98'	0.0004	0.0045	0.0098	0.0115	0.0115	0.0081	0.01	No

Source: Noise Impact Analysis 2020

<sup>1</sup> Receiver locations are shown on Exhibit 10-A of the Noise Impact Analysis.

<sup>2</sup> Based on the Vibration Source Levels of Construction Equipment included on Table 10-4 of the Noise Impact Analysis.

<sup>3</sup> Vibration levels in PPV are converted to RMS velocity using a 0.71 conversion factor identified in the Caltrans Transportation and Construction Vibration Guidance Manual, September 2013.

<sup>4</sup> Source: City of Redlands Municipal Code, Sections 8.06.020.

<sup>5</sup> Does the vibration level exceed the maximum acceptable vibration threshold?

A 90-foot buffer zone is required which would restrict the use of large-loaded trucks, heavy mobile equipment greater than 80,000 pounds, and the use of jack hammers within 90-feet of occupied sensitive receiver locations represented in Table 11. With the 90-foot buffer zone, Project construction vibration levels would be reduced to 0.009 in/sec RMS, and would satisfy the 0.01 in/sec RMS threshold, as shown in Table 12, below:

**Table 12**  
**Mitigated Construction Equipment Vibration Levels**

Receiver <sup>1</sup>	Distance to Const. Activity (Feet)	Receiver Levels (in/sec) PPV <sup>2</sup>					Velocity Levels (in/sec) RMS <sup>3</sup>	Threshold (in/sec) RMS <sup>4</sup>	Threshold Exceeded? <sup>5</sup>
		Small Bulldozer	Jack-hammer	Loaded Trucks	Large Bulldozer	Peak Vibration			
R4	90'	0.0004	0.0051	0.0111	0.0130	0.0130	0.0093	0.01	No

Source: Noise Impact Analysis 2020

<sup>1</sup> Receiver locations are shown on Exhibit 10-A of the Noise Impact Analysis.

<sup>2</sup> Based on the Vibration Source Levels of Construction Equipment included on Table 10-4 of the Noise Impact Analysis.

<sup>3</sup> Vibration levels in PPV are converted to RMS velocity using a 0.71 conversion factor identified in the Caltrans Transportation and Construction Vibration Guidance Manual, September 2013.

<sup>4</sup> Source: City of Redlands Municipal Code, Sections 8.06.020.

<sup>5</sup> Does the vibration level exceed the maximum acceptable vibration threshold?

The impacts at the site of the closest receivers are unlikely to be sustained during the entire construction period but would occur only during times of heavy construction equipment use adjacent to the Project site perimeter. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

- c) **No Impact.** The Project Site is not located within the vicinity of an airport or private airstrip. The nearest airport is the Redlands Municipal Airport, located approximately 4.6 miles northeast of the Project Site. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIV. POPULATION AND HOUSING.</b> Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	( )	( )	(✓)	( )
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	( )	( )	(✓)	( )

**Impact Discussion:**

- a) **Less than Significant Impact.** Construction activities at the site would be short-term and would likely use employees from the existing pool of construction labor in the region. The employees for the Proposed Project would also likely come from the local community. Implementation of the Proposed Project would not require new homes or infrastructure to be built in order to serve Project needs. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

- b) **Less than Significant Impact.** The Proposed Project includes the removal of a single-family residence. The removal of the structure would not require construction of replacement housing elsewhere. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<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, 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?	( )	( )	(✓)	( )
Police protection?	( )	( )	(✓)	( )
Schools?	( )	( )	(✓)	( )
Parks?	( )	( )	(✓)	( )
Other public facilities?	( )	( )	( )	(✓)

**Impact Discussion:**

**Fire Protection**

**Less than Significant Impact.** The Project Site is served by the Redlands Fire Department. The City of Redlands has four stations, and most of Redlands can be reached by the Fire Department within a four-minute response time. The nearest Fire Station to the Project Site is Station 264 located at 1270 West Park Avenue, approximately one mile east of the Project Site. The Proposed Project is required to provide a minimum of fire safety and support fire suppression activities, including type and building construction, fire sprinklers, and paved fire access. The Fire Department and the Building Division (part of the Development Services Department) enforce fire safety standards during review of building plans and regular inspections. The City maintains a joint response/automatic aid agreement with the fire departments in neighboring cities including Colton, Loma Linda, and San Bernardino. No significant adverse impacts are identified or anticipated and no mitigation are required.

**Police Protection**

**Less than Significant Impact.** Public safety services in the City of Redlands are provided by the Redlands Police Department. The main police station is located at 1270 West Park Avenue, the remaining four divisions are located citywide. In 2015, the Department had a response time of 6.5 minutes for police services and a service ratio of 1.1 officers per 1,000 residents. The Proposed Project would be required to provide and implement a site security plan during

construction to ensure that impacts from construction site theft are kept to a minimum. Additionally, implementation of the Proposed Project would not increase the population of the City and would not result in the need for additional police protection. No significant adverse impacts are identified or anticipated and no mitigation measures are required.

### Schools

**Less than Significant Impact.** School services within the City of Redlands are provided by the Redlands Unified School District. The nearest school to the Project Site is Citrus Valley Christian Academy, located approximately 0.16 miles northwest of the Project Site at 2015 Park Ave #4. The Proposed Project is not anticipated to generate any students and would not generate the need for new facilities. With the collection of development impact fees, impacts to schools would be reduced. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

### Parks

**Less than Significant Impact.** The City of Redlands has a total of 17 developed parks and 10 undeveloped planned parks. Redlands Unified School District has 20 locations within the City that provide open space that can be used by the public for recreational purposes (i.e. tennis courts, playgrounds, recreational amenities). These facilities are included in the park inventory through the joint-use agreement between the City and Redlands Unified School District. The City has a total of 424 acres of existing parks and recreational areas. The City's General Plan adopted the park standard of five acres per 1,000 residents; build-out of the City would result in a need for approximately 55 acres of new parkland.

The Proposed Project would not result in an increase in population. Additional public facilities identified in the City's General Plan include postal offices, landfills, fire station and school locations, the Redlands Municipal Airport, the City yard, water and sewer facilities. These public facilities are anticipated to serve the additional population projected at buildout. Implementation of policies and goals provided in the City's General Plan, and collection of developer impact fees would ensure impacts to parks are reduced to a less than significant level. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<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 would occur or be accelerated?	( )	( )	( )	(✓)
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?	( )	( )	( )	(✓)

**Impact Discussion:**

- a, b) **No Impact.** Implementation of the Proposed Project would not result in any substantial increase in the use of neighborhood or regional parks/facilities as new jobs are expected, employees would likely to be filled by the existing employment pool from within the City and adjacent communities. In addition, the Project Site and its associated land use was reviewed as part of the City's General Plan. Therefore, since the Project does not include a General Plan Amendment or Zone Change, jobs related to the land use of commercial/industrial were anticipated. In addition, employees would likely come from the local area and therefore the Proposed Project would not substantially increase the use of existing neighborhood or regional parks or other recreational facilities resulting in a substantial physical deterioration of such facilities. The developer would be required to pay all applicable development impact fees, which would offset any potential incremental increase in usage or impacts. Therefore, no impacts are identified or anticipated and no mitigation measures would be required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVII. TRANSPORTATION.</b> Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	( )	(✓)	( )	( )
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	( )	( )	(✓)	( )
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	( )	( )	(✓)	( )
d) Result in inadequate emergency access?	( )	( )	(✓)	( )

**Impact Discussion:**

- a) **Less than Significant with Mitigation Incorporated.** A Traffic Impact Analysis (TIA), dated August 2020, was completed by LSA Associates, Inc., (all reports are available for review on the City of Redlands website) for the Proposed Project. The purpose of the TIA was to evaluate the potential impacts to traffic and circulation associated with the development of the Proposed Project, and to recommend improvements to mitigate impacts considered significant in comparison to established regulatory thresholds. The study area for the Proposed Project was finalized based on the criteria stated in the San Bernardino County Transportation Authority's (SBCTA) *Congestion Management Plan (CMP) Traffic Impact Guidelines* (2016) and discussions with City staff.

The Proposed Project was estimated to generate 1,026 daily passenger car equivalent (PCE) trips with 88 PCE trips occurring in the a.m. peak hour and 93 PCE trips occurring

in the p.m. peak hour. The TIA analyzed the three full-access driveways for ingress/egress located on New Jersey Street.

The study area was approved by City staff via the City's scoping agreement process. Based on the TIA Guidelines, intersections where the Project would add 50 or more peak hour project trips or where the City recommended inclusion of the intersection during the scoping agreement process have been included in the analysis. The study area consists of the following four intersections and three driveways, all within the jurisdiction of the City:

### **Study Intersections**

- California Street/I-10 Westbound Ramps
- California Street/I-10 Eastbound Ramps
- California Street/Redlands Boulevard
- New Jersey Street/Redlands Boulevard
- New Jersey Street/ Park Avenue
- New Jersey Street/Project Driveway 1
- New Jersey Street/Project Driveway 2
- New Jersey Street/Project Driveway 3

The City of Redlands' General Plan definition of an intersection deficiency states that peak-hour intersection operations of level of service (LOS) C or better are generally acceptable. Therefore, any intersection operating at LOS D to F would be considered deficient.

In accordance to the City of Redlands Measure U Section 1A.60 Principle Six (a), all new development projects shall assure by appropriate mitigation measures that, at a minimum, traffic Levels of Service are maintained at a minimum of LOS C throughout the City, except where the current LOS is lower than LOS C, or as provided in Section 5.20 of the Redlands General Plan where a more intense LOS is specifically permitted. In any location where the LOS is below C at the time an application for a development project is submitted, mitigation measures shall be imposed on that development project to assure, at a minimum, that the LOS is maintained at LOS that are no worse than those existing at the time an application for development is filed, except as provided in Section 5.20b.

Sections: 5.20a, 5.20b, 5.20c of Measure U Section 5.0 Circulation Element are listed as Guiding Policies: Standards for Traffic Service and state:

- **5.20a.** Maintain Level of Service C or better as the standard at all intersections presently at Level of Service C or better.
- **5.20b.** Within the area identified in the General Plan (Figure 5.3), including that unincorporated County area identified as the "donut hole," maintain Level of Service C or better; however, accept a reduced Level of Service D on a case by case basis upon approval by a four-fifths (4/5ths) vote of the total authorized membership of the City Council.
- **5.20c.** Where the current Level of Service at a location within the City of Redlands is below the Level of Service C standard, no development project shall

be approved that cannot be mitigated so that it does not reduce the existing Level of Service at that location except as provided in Section 5.20b.

Per the City of Redlands' traffic study guidelines, a "significant" direct traffic impact under CEQA occurs when the project reduces the Level of Service for opening year as follows:

- **Pre-project Level of Service C or better:** Project-related Level of Service D or worse for signalized intersections.
- **Pre-project Level of Service C or better:** Project-related Level of Service D or worse for unsignalized intersections which meet peak-hour traffic signal warrant.
- **Pre-project Level of Service D or worse:** If the project reduces the Level of Service to a facility which previously operated at Level of Service D or worse, the project shall provide improvements at a minimum to the pre-project delay.

Traffic conditions were examined for the weekday a.m. and p.m. peak hour conditions under the following scenarios:

- Existing conditions
- Existing with project conditions
- Opening year without project conditions
- Opening year with project conditions
- Cumulative without project conditions
- Cumulative with project conditions
- Year 2040 without project conditions
- Year 2040 with project conditions

An intersection LOS analysis was conducted for opening year without and with project conditions. The results of the analysis show that the intersection at California Street/I-10 is forecast to operate at an unsatisfactory LOS. The intersection LOS analysis for Opening Year (2021) Conditions show that a cumulative project impact occurs at the intersection of California Street/I-10 Westbound Ramps. The Proposed Project would also contribute to the forecast deficiency at the intersection of California Street/Redlands Boulevard. The intersection LOS analysis for Cumulative (2021) Conditions show that a cumulative project impact occurs at the intersection of California Street/I-10 Eastbound Ramps and the Proposed Project would also contribute to the forecast deficiency at the intersections of California Street/I-10 Westbound Ramps and California Street/Redlands Boulevard. Furthermore, the intersection LOS analysis for Year 2040 Conditions show that a cumulative project impact occurs at the intersections of California Street/I-10 Eastbound Ramps and California Street/Redlands Boulevard. The Project would also contribute to the forecast deficiency at the intersection of California Street/I-10 Westbound Ramps. All other study intersections are forecast to operate at a satisfactory LOS.

Based on the analysis of Project operations, off-site improvements would be required to minimize potentially significant traffic impacts associated with development of the Project and projected ambient growth, cumulative conditions, and General Plan build-out conditions. Therefore, 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:

- T 1: Improvements to the intersection at California Street and I-10 Westbound Ramps shall include converting the southbound right-turn lane to a channelized free right-turn lane with yield.**
- T 2: Improvements to the intersection at California Street and Redlands Boulevard shall include adding a westbound right-turn overlap.**
- T 3: Prior to the issuance of a Certificate of Occupancy, the applicant shall pay a prorated share to the City if the Caltrans project has not yet been implemented at time of Certificate of Occupancy.**
- T 4: In the absence of any fee program where the Project contributes to a deficiency or has an impact on the roadway network, the Project Proponent shall pay its fair share of the cost required to mitigate the deficiency or impact. The Project Proponent will pay its respective fair share for the addition of the southbound left turn lane at the intersection of California Street/Redlands Boulevard under year 2040 conditions. The Project's fair share has been calculated based on project traffic as a percentage of total growth from existing to year 2040 conditions.**

- b) **Less than Significant Impact.** Trip generation is a measure or forecast of the number of trips that begin or end at a particular site and is a function of the extent and types of land use proposed as part of a project. Vehicular traffic generation characteristics for projects are estimated based on established rates. These rates identify the probable traffic generation of various land uses based on studies of developments in comparable settings. Vehicle miles traveled (VMT) exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be considered to have a less than significant transportation impact.

The growth rates used in the analysis were developed using the San Bernardino County Transportation Analysis Model (SBTAM). The trip generation for the Proposed Project was developed using rates from the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (9th Edition) for Land Use 150 – “Warehousing.” The SBTAM estimated that the Project would generate a 2.67 percent annual growth rate in VMT. The resulting trips were converted to trucks and passenger vehicles based on the SCAQMD requirements for warehousing projects. As such, 40 percent of Project traffic would be trucks. Based on the San Bernardino County Transportation Authority (SBCTA) Congestion Management Program (CMP) TIA Guidelines, all truck trips were converted to passenger car equivalents (PCEs) using a 1.5 PCE factor for 2-axle trucks, 2.0 for 3-axle trucks, and 3.0 for 4- and more axle trucks. Based on these converses, the Project is anticipated to generate approximately 1,026 PCE trips daily.

There are four (4) Omnitrans bus routes located within half-mile of the Project Site. All four bus stops are between Iowa Street and Nevada Street. There are impacts to the



thresholds of significance that would affect the routes located on Redlands Boulevard. The intersection at California Street and Redlands Boulevard is anticipated to operate at an unsatisfactory LOS. Impacts would be reduced to a less than significant impact by implementation of Mitigation Measure T-2. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

- c, d) **Less than Significant Impact.** Final Project site plans would be subject to City review and approval to ensure that the Proposed Project would not create substantial hazards due to a design feature or incompatible use. The Project's site plan proposes three full-access driveways, all located on New Jersey Street. The site plan design is not expected to cause a substantial increase in hazards or provide inadequate emergency access. Plans will be subject to review and approval by the City Fire and Police Departments. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVIII. TRIBAL CULTURAL RESOURCES.</b>  Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21704 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	( )	(✓)	( )	( )
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	( )	(✓)	( )	( )

**Impact Discussion:**

- a,b) **Less than Significant with Mitigation Incorporated.** As discussed in Section V of this document, two Cultural Resources Assessments (CRAs), dated May 2020, were prepared by LSA Associates, Inc. (LSA) for the individual parcels (APN 0292-154-09 and 0292-154-21) that make up the Project Site and are available for review on the City of

Redlands website. The CRAs were prepared to determine impacts to historical resources that may occur on the Project Site, including Native American cultural resources.

On November 6, 2019, LSA requested a review of the SLF for APN 0292-154-21 from the NAHC. On November 13, 2019, the NAHC responded indicating positive results for the SLF search and a list of Tribes and individuals designated for consultation. At the direction of the City and at the same time individuals were contacted for APN 0292-154-09, LSA also informed the individuals of the proposed development on APN 0292-154-21 on November 6, 2019 and followed up on February 6, 2020. Responses were received from three Tribes. Ms. Jessica Mauck on behalf of the San Manuel Band of Mission Indians responded on November 14, 2019, and indicated that, while the Project is located within an SLF that the NAHC has on file for the area, the San Manuel Band of Mission Indians (SMBMI) is unlikely to have concerns with the Project due to the existing development on-site. Ms. Mauck indicated that she would respond to the Lead Agency, on behalf of SMBMI, upon receipt of the formal CEQA notice from the Lead Agency. Agua Caliente Band of Cahuilla Indians (Arysa Gonzalez Romero) responded on December 17, 2019, indicating the Project is within the Tribe's Traditional use area and requested a copy of the cultural resources inventory of the Project area by a qualified archaeologist prior to any development activities; a copy of the records search with associated survey reports and site records from the information center and copies of any cultural resource documentation (report and site records) generated in connection with this project. Morongo Band of Mission Indians (Travis Armstrong) responded on February 26, 2020 indicating that the Tribe has no comments at this time but may provide other information to the Lead Agency during the AB 52 consultation process. No response was received from any of the other individuals contacted.

On April 4, 2019, LSA requested a Sacred Lands File (SLF) search for APN 0292-154-09 from the Native American Heritage Commission (NAHC). On April 16, 2019, the NAHC responded indicating positive results for the SLF search and a list of Tribes and individuals designated for consultation. At the direction of the City, LSA contacted all individuals on the list on November 6, 2019, and followed up on February 6, 2020. Responses were received from five Tribes. The Soboba Band of Luiseño Indians (Joseph Ontiveros) responded on November 6, 2019 indicating that they are currently preparing a response and requested that, in the future, Cultural Resource Specialist Jessica Valdez be copied on all correspondence. Ms. Jessica Mauck of the SMBMI responded on November 14, 2019 and indicated that, while the Project is located within an SLF that the NAHC has on file, the SMBMI is unlikely to have concerns with the Project due to the existing development on site and that she will respond to the Lead Agency, on behalf of SMBMI, upon receipt of the formal CEQA notice from the Lead Agency. Ms. Donna Yocum of the San Fernando Band of Mission Indians responded the same day, deferring to SMBMI. Agua Caliente Band of Cahuilla Indians (Ms. Lacy Padilla) responded on December 9, 2019, indicating the Project is within the Tribe's Traditional use area and requested a copy of the cultural resources inventory of the project area by a qualified archaeologist prior to any development activities, a copy of the records search with associated survey reports and site records from the information center, and copies of any cultural resources documentation (report and site records) generated by the project. The tribal also provided a list of mitigation measures for the Project. Morongo Band of Mission Indians (Mr. Travis Armstrong) responded on February 26, 2020 indicating that the Tribe has no comments to provide at this time but may provide other information to the Lead Agency during the AB 52 consultation process. No response was received from any of the other individuals contacted.

The City of Redlands distributed AB 52 consultation letters on November 14, 2019 for the Proposed Project via certified mail. The San Manuel Band of Mission Indians, Morongo Band of Mission Indians, and Soboba Band of Luiseno Indians expressed interest in the Project. To ensure potential impacts to Tribal Cultural Resources are reduced to a less than significant level the following mitigation measures shall be made a part of Project Conditions of Approval and include:

**Mitigation Measure TCR-1: Tribal Monitoring.** Native American Tribal Monitor(s) from the consulting tribe(s) shall be permitted to access the construction site and partake in monitoring from a safe location on a simultaneous and/or rotating basis, based on the scope of work including but not limited to: all site preparation activities; all construction and demolition-based activities; and testing and data recovery. Prior to City's issuance of a grading permit, the Project Developer/Applicant shall develop monitoring agreements with the consulting tribe(s). The monitoring plan shall include the following:

a. Project grading and development scheduling.

b. A monitoring schedule for activities on the Project site in accordance with the recommendations of the Cultural Resources Report, including but not limited to: site preparation activities; construction and demolition-based activities; and testing and data recovery. Ground-disturbing activities are defined as any activity that compacts or disturbs the ground within a project area. The project area is defined as all areas where project activities will occur, including: the actual construction activities, staging areas for supplies and equipment, and borrow pits. Ground disturbance can also be caused by the use of hand tools (shovels, pick axe, posthole digger, etc.), heavy equipment (excavators, backhoes, bulldozers, trenching and earthmoving equipment, etc.), and heavy trucks (large four-wheel drive trucks, dump trucks and tractor trailers, etc.), and grubbing, testing and data recovery on the Project site. The monitoring plan shall include scheduling, safety requirements, duties, scope of work, and a discussion of the Tribal Monitors' authority to stop and redirect grading activities.

c. The protocols and stipulations that the Applicant, City of Redlands, and Native American Tribal Monitor(s) shall follow in the event of inadvertent discoveries of tribal cultural resources that shall be subject to evaluation. A Native American monitor from the consulting tribe(s) shall be present during the initial ground disturbing activities in accordance with the recommendations of the Project's Cultural Resources Report.

**Mitigation Measure TCR-2: Treatment and Disposition of Tribal Cultural Resources.** In the event that tribal cultural resources, including historic and pre-contact materials, are discovered during the course of ground-disturbance activities, the following procedures shall be implemented:

1. All work in the immediate vicinity of the find (within a 100-foot buffer) shall cease and the find shall be assessed by a Tribal Monitor from the consulting tribe(s). Work on the other portions of the project outside of the buffer area may continue during this assessment period.

2. **The City of Redlands Planning Division and representative(s) of all consulting tribe(s) shall be immediately notified of any find, including information regarding the nature of the find.**
3. **Temporary Curation and Storage:** During construction, any tribal cultural resources that may be discovered shall be temporarily curated in a locked and secured location on-site, as determined appropriate with consideration of input from consulting tribe(s). The removal of any tribal cultural resources from the Project site shall be thoroughly inventoried and overseen by the Tribal Monitor(s).
4. **Treatment and Final Disposition:** The Applicant shall relinquish ownership of all tribal cultural resources, including sacred items, burial goods, archaeological artifacts, and non-human remains discovered during construction of the proposed Project. The Applicant shall relinquish the tribal cultural resources through one or more of the following methods and provide the City of Redlands with evidence of same:
  - a. **Accommodate the process for onsite reburial of the discovered tribal cultural resources in consultation with the consulting Native American tribe(s) or band(s). The reburial area shall be protected from any future impacts. All reburials are subject to a reburial agreement that shall be developed between the landowner and the consulting tribe(s) outlining the determined reburial process/location, and shall include measures and provisions to protect the reburial area from any future impacts (vis a vis Project plans, conservation/preservation easements, etc.). Reburial shall not occur until all cataloguing and recordation have been completed.**
  - b. **In the event that reburial is infeasible, and/or if more than one Native American tribe or band is involved with the proposed project and cannot come to a consensus as to the disposition of cultural resources within one hundred twenty (120) days from the initial recovery of the items, the cultural resources shall be curated. The landowner shall relinquish all ownership and rights to this material and confer with the consulting tribes to identify an American Association of Museums (AAM)-accredited facility within the County that can accession the materials into their permanent collections and provide for the proper care of these objects in accordance with the 1993 California Curation Guidelines. A curation agreement with an appropriate qualified repository shall be developed between the landowner and museum that legally and physically transfers the collections and associated records to the facility. This agreement shall stipulate the payment of fees necessary for permanent curation of the collections and associated records and the obligation of the Project developer/applicant to pay for those fees.**
  - c. **Within sixty (60) days following the completion of ground-disturbing activities, a Phase IV Monitoring Report shall be submitted to the City of Redlands Planning Division. The Monitoring Report shall document monitoring activities conducted by the Project Archaeologist and Native American Tribal Monitor(s) including: any impact to tribal cultural**

resources discovered on the Project site; how each mitigation measure was fulfilled; the type of tribal cultural resources recovered and the disposition of such resources; evidence of completion of pre-grading cultural sensitivity training required for the construction staff; and daily/weekly monitoring notes from the archaeologist in a confidential appendix. The Phase IV Monitoring Report shall be submitted to the City of Redlands Planning Division, the appropriate California Historical Resource Information System (CHRIS), and the consulting tribe(s).

**Mitigation Measure TCR-4: Documents.** 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 Project developer/applicant and the City of Redlands Planning Division for dissemination to consulting tribe(s).

**Mitigation Measure TCR-5: Discovery of Human Remains.** In the event that human remains are encountered on the Project site, the construction contractors, Project archaeologist, and Native American Tribal Monitor(s) shall immediately stop all work within 100 feet of the discovery. The Applicant shall immediately notify the San Bernardino County Coroner, the City of Redlands Police Department, and the City of Redlands Development Services Department and consulting Tribe(s). NO photographs of the remains and/or cremations are to be permitted. Photographs will be taken ONLY by the County Coroner. The County Coroner shall be permitted to examine the remains consistent with the requirements of California Code of Regulations (CCR) §15064.5(e). State Health and Safety Code §7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) §5097.98. If the remains are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), which shall determine and notify a Most Likely Descendant (MLD). The MLD shall complete the inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The MLD recommendations may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials, preservation of Native American human remains and associated items in place, relinquishment of Native American human remains and associated items to the descendants for treatment, or any other culturally appropriate treatment.

The specific location of Native American burials and reburials will be proprietary and not disclosed to the general public. The locations will be documented by the Project Archaeologist in conjunction with the various stakeholders and a report of findings will be filed with the appropriate California Historical Resource Information System (CHRIS).

According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052). In the event that the Project proponent and the MLD are in disagreement regarding the disposition of the remains, State law will apply and the mediation and decision process will occur with the NAHC (see Public Resources Code Section 5097.98(e) and 5097.94(k)).

Based on completion of consultation under AB 52 with interested tribes, additional recommendations may be incorporated into the Project's Conditions of Approval. Implementation of the above mitigation measures and the addition of recommendations from interested tribes as Conditions of Approval, would ensure that potential impacts to tribal cultural resources are reduced to a less than significant level.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIX. UTILITIES AND SERVICE SYSTEMS.</b> Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	( )	( )	(✓)	( )
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	( )	( )	(✓)	( )
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?	( )	( )	(✓)	( )
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	( )	( )	(✓)	( )
e) Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?	( )	( )	(✓)	( )

**Impact Discussion:**

- a, c) **Less than Significant Impact.** The City of Redlands wastewater is treated at a City-owned wastewater treatment plant located on the south side of the Santa Ana River, at the north end of California Street. It is a secondary plant which disposes solids off-site and includes basins for effluent to percolate into the underlying aquifer after treatment. The Proposed Project would be served by the City of Redlands sewer collection system. The Proposed Project would generate wastewater that can be discharged to a municipal system with sufficient capacity. The existing flow at the Redlands facility is approximately 6 million gallons per day (MGD) and the plant's current design capacity is 9.5 MGD.

The Proposed Project would be consistent with the General Plan designation for the site and would be required to meet the requisites of the City of Redlands and the Santa Ana RWQCB regarding wastewater quality. The Proposed Project would not require the construction of new wastewater facilities, exceed wastewater treatment requirements, or exceed wastewater treatment capacities. The new development is anticipated to use to existing utility hookups and is expected to be adequately served by existing utility infrastructure.

The production and distribution of water in the Project area is provided by the City of Redlands. The City provides water services to Redlands and areas in Mentone, and operates and maintains approximately 400 miles of pipeline, seven (7) pressure zones and has a maximum storage capacity of 54.5 million gallons per day.

Implementation of the Proposed Project would not 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 (refer to Section VI of this report). The Project Proponent would be required to pay new service fees, monthly meter charges, and monthly service fees for domestic water service. The City of Redlands has implemented a Water Conservation Plan, outlined in the Redlands Municipal Code Title 13, Chapter 13.06 to reduce water use. With implementation of these required water saving measures, water demand for the Proposed Project is expected to be within the estimated Citywide water demand estimates. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

- b) **Less than Significant impact.** The Redlands Planning Area domestic water sources consists of both surface water (about 50 percent of total supply) and groundwater (about 50 percent of total supply). The City is entitled to surface water from both Mill Creek and the Santa Ana River. The City of Redlands uses 18 wells that pump directly into the system or into reservoirs. All wells are adequately separated from sewerage facilities and are free from serious flooding hazard. Redlands operates two surface water treatment plants and uses 15 wells, 37 booster pumps, 18 reservoirs, and 400 miles of transmission and distribution lines to provide water to its customers. Of this infrastructure, one booster station is used for non-potable water. The capacity of the City's 18 reservoirs totals 54.45 million gallons.

The City is within the long-range water supply planning area of the San Bernardino Valley Municipal Water District (SBVMWD). Currently, the SBVMWD's available groundwater supply is approximately 49,460 acre-feet per year (AFY) or 16.1 billion gallons per year. SBVMWD is also responsible for long-range water supply management, including importing supplemental water, and is responsible for storage management of most of the groundwater basins within its boundaries and for groundwater extraction. Table 13 provides a comparison of regional water supplies and demands for the entire SBVMWD service area (including the City of Redlands) as provided in the 2015 San Bernardino Valley Regional Urban Water Management Plan, updated in 2017 during a multiple-dry year period. The multiple-dry year period is generally the lowest annual runoff for a three-year or more consecutive period.

As shown in Table 13, adequate regional supplies for the years 2020 to 2040 under multiple-dry year conditions exists. If the conditions are not met by the natural water

supply, including new conservation, the local agencies would be required to implement Contingency Drought Emergency Plans, thereby reducing demands to meet supplies.

**Table 13**  
**Water Supply and Demand During Multiple-Dry Year Period (AFY)**  
**San Bernardino Valley**

Year	Totals	2020	2025	2030	2035	2040
First Year	Supply Totals	327,444	335,034	342,227	349,455	356,283
	Demand Totals	251,247	262,042	272,882	284,495	293,105
	Difference (Supply minus Demand)	76,196	72,992	69,345	64,960	63,178
Second Year	Supply Totals	327,444	335,034	342,227	349,455	356,283
	Demand Totals	247,360	257,774	268,112	279,205	287,450
	Difference (Supply minus Demand)	80,083	77,260	74,115	70,250	68,833
Third Year	Supply Totals	327,444	335,034	342,227	349,455	356,283
	Demand Totals	241,881	251,870	261,662	272,191	280,072
	Difference (Supply minus Demand)	85,562	83,163	80,564	77,264	76,211

The Proposed Project's water supply requirements would be met by the City's municipal water supply system. In the 2015 San Bernardino Valley Regional Urban Water Management Plan shows the City of Redlands projected water demand for 2020 to be 33,138 AFY and 35,715 AFY for the year 2040. In a multiple dry year scenario for 2020 demand would be 30,142 AFY and 32,649 AFY in 2040. Availability of supplies in a Multiple-Dry Year 3<sup>rd</sup> Year scenario is forecasted at 90 percent of average supply. Based on the City's available supplies, the City can continue to meet multiple and single dry year demands. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

- d, e) **Less than Significant Impact.** Solid waste from Redlands is primarily disposed of at the California Street Landfill operated by the City, and the San Timoteo Sanitary Landfill operated by the County of San Bernardino. With continued recycling efforts, there is sufficient capacity at the San Timoteo Sanitary Landfill to accommodate growth for the next 20 years and beyond. (San Timoteo: permitted until January 2039<sup>1</sup> or California Street: permitted until 2042).

According to CalRecycle Estimated Solid Waste Generation Rates for manufacturing/warehouse, the Proposed Project is anticipated to generate approximately 2,548 pounds (1.27 tons) of solid waste per day (179,400 square-foot times 1.42 pounds per 100 square-foot per day). The San Timoteo Sanitary Landfill and the California Street Landfill are permitted to receive 2,000 tons per day and 829 tons per day, respectively. Estimated project-generated waste represents approximately 0.000635 percent and 0.00153 percent of the total permitted waste received at these landfill facilities. The solid waste collection system would not be affected by the development of the Project Site as sufficient capacity exists at the two facilities.

<sup>1</sup> <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1906?siteID=2688> (accessed 10-16-20).



Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<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?	( )	( )	( )	(✓)
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?	( )	( )	(✓)	( )
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?	( )	( )	( )	(✓)
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?	( )	( )	(✓)	( )

**Impact Discussion:**

- a) **No Impact.** According to Figure 7-4 of the City's General Plan, the Project Site is not located within a high fire hazard severity zone. As discussed in the City of Redlands Hazard Mitigation Plan, San Bernardino County Fire Department Office of Emergency Services has a "Critical Route Planning Committee" that is developing countywide routes and alternate routes for use in evacuating residents from a disaster area while simultaneously allowing first responders' access into a disaster area without congestion and gridlock. Implementation of the Proposed Project would not impair any emergency response plans or counter any emergency evacuation routes or plans. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- b, d) **Less than Significant impact.** As shown in Figure 7-4 of the City's General Plan, the Project Site occurs in an area considered to have minimal to no fire threat. In the City, the highest fire risk areas occur in the San Timoteo and Live Oak canyons. Crafton Hills is another high-risk area, situated in the northeast area of the City and in the Redlands' Sphere of Influence. Prolonged droughts coupled with high winds and dry vegetation during summer months creates the highest fire risk in these areas. Redlands is subject to Santa Ana winds, which can reach up to 100 miles per hour. These winds, which typically occur several times per year between September and December, have been

known to topple power lines, trees, and streetlights. These winds can also spread uncontrolled wildfire and hinder firefighters from reaching fires.

The Project Site is generally flat, accessible and is approximately two miles from the nearest high fire hazard zone. Due to the surrounding topography, general level with two percent slopes, the Project Site would not be susceptible to landslides and would not have downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

- c) **No Impact.** The Proposed Project is currently developed and is currently serviced by existing infrastructure including roadways (i.e. New Jersey Street), power lines, natural gas lines, water, sewer and telephone). The Proposed Project does not include the installation or maintenance of infrastructure and therefore the risk of fire from these activities is not anticipated. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<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?	( )	( )	(✓)	( )
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)?	( )	( )	(✓)	( )
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	( )	( )	(✓)	( )

**Impact Discussion:**

- a) **Less than Significant Impact.** The Project Site is not located in an area identified as Critical Habitat. A Biological Resources Technical Memorandum was completed by LSA

Associates, Inc., to determine significant impacts to the quality of the environment of the Project Site including impacts on habitats and threatened or endangered species. The report concluded the Project Site is very unlikely to provide potential for any special status species' habitat given the level of disturbance which has occurred throughout the Project Site. However, there are still trees in the area that may provide nesting habitat for birds. Implementation of Mitigation Measures BIO-1 as provided in this Initial Study would ensure that potential impacts are reduced to a less than significant level.

A Cultural Resources Assessment was completed by LSA Associates, Inc., to determine significant impacts to the major periods of California history and prehistory of the Project Site and surrounding area. The existing structures on-site have no historical significance and no archaeological resources or significant geologic units were encountered or recorded as existing on-site. Implementation of Mitigation Measures CR-1, CR-2, and TCR-1 through TCR-5 as provided in this Initial Study would ensure impacts to cultural resources including tribal cultural resources are less than significant. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

- b) **Less than Significant Impact.** Cumulative impacts are defined as two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the development when added to the impacts of other closely related past, present, and reasonably foreseeable or probable future developments. Cumulative impacts can result from individually minor, but collectively significant, developments taking place over a period. The CEQA Guidelines, Sections 15130 (a) and (b), states:

- (a) Cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable.
- (b) The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided of the effects attributable to the project. The discussion should be guided by the standards of practicality and reasonableness.

The Proposed Project is consistent with the General Plan land use patterns and applicable regional plans and would not result in development that would be substantially greater in intensity than what was planned for in the General Plan. The potential cumulative environmental effects of the Proposed Project would fall within the impacts identified in the City's General Plan Update EIR. This includes cumulative agricultural, air quality/GHG, noise, traffic, and cultural/tribal impacts. No cumulative impact greater than that identified in the General Plan EIR would result from implementation of the Proposed Project.

- c) **Less than Significant Impact.** The incorporation of design measures, City of Redlands policies, standards, and guidelines and proposed mitigation measures as identified within this Initial Study would ensure that the proposed project would have no significant adverse effects on human beings, either directly or indirectly on an individual or cumulative basis. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

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