

301 Tennessee Street Warehouse Project

Mitigation Monitoring and Reporting Program

Lead Agency:

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May 4, 2023

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MITIGATION MONITORING AND REPORTING PROGRAM

The California Environmental Quality Act (CEQA) requires that a public agency adopting a Mitigated Negative Declaration (MND) take affirmative steps to determine that approved mitigation measures are implemented after project approval. The lead or responsible agency must adopt a reporting and monitoring program for the mitigation measures incorporated into a project or included as conditions of approval. The program must be designed to ensure compliance with the MND during project implementation (California Public Resources Code, Section 21081.6(a)(1)). This Mitigation Monitoring and Reporting Program (MMRP) will be used by the City of Redlands to ensure compliance with adopted mitigation measures identified in the Addendum to the MND for the 301 Tennessee Street Warehouse Project (“project”) when construction of the proposed project begins. The City of Redlands, as the lead agency, will be responsible for ensuring that all mitigation measures are carried out. Implementation of the mitigation measures would reduce impacts to below a level of significance for air quality, biological resources, cultural resources (archaeological), geology and soils (paleontological), hazards and hazardous materials, and Tribal cultural resources. The remainder of this MMRP consists of a table that identifies the mitigation measures by resource for each project component. The table identifies the mitigation monitoring and reporting requirements, including the method for verifying implementation of the mitigation measure, timing of verification (before, during, or after construction), and responsible party. Space is provided for sign-off following completion/implementation of the mitigation measure. The source document is the Initial Study/Mitigated Negative Declaration prepared for the proposed Project (dated May 1, 2023).

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IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Responsible Party/ Monitoring Party	Method of Verification	Monitoring Action/ Implementation Stage	Signature	Date
AIR QUALITY						
Expose Sensitive Receptors to Substantial Pollutant Concentrations.	AIR-1: During construction of the proposed project, the project contractor shall ensure all off-road diesel-powered construction equipment of 50 horsepower or more used for the project is equipped with Level 3 diesel particulate filters or equivalent.	Construction Contractor/ Project Proponent City of Redlands Development Services Department	Review of construction plans/ monitoring logs by City staff.	Prior to issuance of grading/ construction permits. Field verification during construction.		
BIOLOGICAL RESOURCES						
Potential Impacts on Nesting Birds.	BIO-1: If vegetation removal is scheduled during the nesting season (typically February 1 to September 1), then a focused survey for active nests shall be conducted by a qualified biologist no more than five (5) days before the beginning of project-related activities (e.g., demolition, excavation, grading and vegetation removal). Surveys must be conducted in proposed work areas, staging and storage areas, and soil, equipment, and material stockpile areas. For passerines and small raptors, surveys must be conducted within a 250-foot radius surrounding the work area (in non-developed areas and where access is feasible). For larger raptors, such as those from the genus <i>Buteo</i> , the	Construction Contractor/Developer City of Redlands Development Services Department	Review of focused survey/ monitoring logs by City staff.	Prior to issuance of grading/ construction permits. Field verification prior to grading and during construction.		

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	<p>survey area must encompass a 500-foot radius. Surveys must be conducted by a qualified biologist during weather conditions suited to maximize the observation of possible nests and concentrate on areas of suitable habitat. If a lapse in project-related work of five days or longer occurs, an additional nest survey is required before work can be reinitiated. If nests are encountered during any preconstruction survey, a qualified biologist must determine if it may be feasible for construction to continue as planned without impacting the success of the nest, depending on conditions specific to each nest and the relative location and rate of construction activities. Any nest(s) within the project site shall be monitored by a qualified biologist during vegetation removal if work is occurring directly adjacent to the pre-determined no-work buffer. If the qualified biologist determines construction activities have potential to adversely affect a nest, the biologist will immediately inform the construction manager to halt construction activities within minimum exclusion buffer of 50 feet for songbird nests, and 200 to 500</p>					

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	feet for raptor nests, depending on species and location. Construction activities within the no-work buffer may proceed after a qualified biologist determines the nest is no longer active due to natural causes (e.g., young have fledged, predation or other non-anthropogenic nest failure).					
CULTURAL RESOURCES						
Adverse Change in the Significance of an Archaeological Resource.	CUL-1: In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, as detailed within TCR-1, regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with	Construction Contractor/ Project Proponent City of Redlands Development Services Department	Review of cultural resources survey/ monitoring logs by City staff.	During grading and during construction.		

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	regards to significance and treatment.					
Adverse Change in the Significance of an Archaeological Resource.	CUL-2: If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to YSMN for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.	Construction Contractor/ Project Proponent City of Redlands Development Services Department	Review of cultural resources survey/ monitoring treatment plan and logs by City staff.	Prior to issuance of grading/ construction permits. Verification prior to grading and during construction.		
Potential Disturbance of Buried Human Remains.	CUL-3: If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.	Construction Contractor City of Redlands Community Development Department County of San Bernardino Sheriff's Department/ Coroner Division	Review of monitoring logs by City staff.	Field verification during grading and construction.		
GEOLOGY AND SOILS						

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Adverse Change in the Significance of a Paleontological Resource.	GEO-1: If paleontological materials are uncovered during grading or other earth moving activities, the contractor shall be required to halt work in the immediate area of the find, and to retain a professional paleontologist to examine the materials to determine whether it is a significant paleontological resource. If this determination is positive, the resource shall be left in place, if determined feasible by the project paleontologist. Otherwise, the scientifically consequential information shall be fully recovered by the paleontologist. Work may continue outside of the area of the find; however, no further work shall occur in the immediate location of the find until all information recovery has been completed and a report concerning it filed with the Community Development Director. The applicant shall bear the cost of implementing this mitigation.	Construction Contractor/ Project Proponent City of Redlands Development Services Department	Review of paleontological resources survey/ monitoring logs by City staff.	Prior to issuance of grading/ construction permits. Field verification prior to grading and during construction.		
HAZARDS AND HAZARDOUS MATERIALS						
Significant Hazard as a Result of Routine Transport, Use, or Disposal of	HAZ-1: Soil Testing. Prior to issuance of a grading permit, representative soil sampling will be conducted onsite at depths of one	Project Proponent and Contractor	Review of sampling and testing report by City staff.	Prior to issuance of grading/ construction permits.		

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<p>Hazardous Materials</p> <p>Significant Hazard as a Result of Reasonable Foreseeable Upset and Accident Conditions</p> <p>Emit Hazardous Emissions or Handle Hazardous Materials Within One-Quarter Mile of a School</p>	<p>and three feet and tested for organochlorine pesticides (OCPs) and heavy metals which may be present from past agricultural activities. The developer shall retain a qualified environmental professional (QEP) to design and supervise the sampling and testing. A final report shall be prepared summarizing the results of this testing and where onsite soils meet current industrial standards for sampled materials.</p> <p>If the QEP determines that all onsite soil meets industrial standards, no further action is required. If onsite soils do not meet industrial standards, the QEP will work with the developer and grading contractor to determine how onsite soils can be mixed with clean offsite or imported soils to achieve the industrial standard for the entire site. The QEP, developer, and grading contractor shall also identify if or how much soil needs to be removed from the site. The collection and disposal of any excavated contaminated soils shall be in accordance with applicable hazardous materials regulations.</p>	<p>City of Redlands Development Services Department</p>		<p>Field verification prior to grading and during construction.</p>		

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<p>Significant Hazard as a Result of Routine Transport, Use, or Disposal of Hazardous Materials</p> <p>Significant Hazard as a Result of Reasonable Foreseeable Upset and Accident Conditions</p> <p>Emit Hazardous Emissions or Handle Hazardous Materials Within One-Quarter Mile of a School</p>	<p>HAZ-2: Soil Vapor Extraction (SVE) System. Onsite SVE remediation activities began in September 2022 and were ongoing during preparation of the CEQA document. Two deep extraction wells (SVE-1 and SVE-2) are located on the northern and western portions of the site outside of the existing warehouse building. However, these wells would be impacted by development of the new warehouse project. Based on ongoing soil vapor monitoring, the existing SVE remediation activities will be completed by June 2023. These activities must be completed, and a final report submitted to the City prior to issuance of a grading permit for the new warehouse. Regulatory oversight and approval of this system will be at the discretion of the San Bernardino County Fire Department as the County's Certified Unified Program Agency (CUPA). If the CUPA declines to be the regulatory authority for this oversight, the applicant shall enter into a Voluntary Cleanup Program (VCP) with the California Department of Toxic Substances Control (DTSC). The applicant must</p>	<p>Project Proponent and Contractor</p> <p>City of Redlands Development Services Department</p>	<p>Review of remediation report by City staff.</p>	<p>Prior to issuance of grading/ construction permits.</p> <p>Field verification prior to grading and during construction.</p>		

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	<p>document the site meets all applicable health standards for groundwater and soil per the appropriate regulatory authority discussed above before a grading permit can be issued. Additional details on the SVE system can be found in Roux's SVE Pilot Test Technical Memorandum dated January 4, 2023 and the DRAFT Construction Completion Report dated March 3, 2023.</p> <p>Once it is documented that applicable health standards have been met by the existing SVE activities, they can be shut down and all wells and subsurface piping shall be removed from the site. Confirmatory soil vapor samples will then be used to conduct a post-remediation human health risk assessment (HHRA). If the post-remediation HHRA shows risk less than 1:1,000,000 ("one in a million new cancer deaths"), no additional work associated with residual VOC concentrations is required (i.e., Mitigation Measure HAZ-3 is not required). If the post-remediation HHRA shows risk greater than 1:1,000,000 then the developer shall</p>					

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	implement Mitigation Measure HAZ-3.					
<p>Significant Hazard as a Result of Routine Transport, Use, or Disposal of Hazardous Materials</p> <p>Significant Hazard as a Result of Reasonable Foreseeable Upset and Accident Conditions</p> <p>Emit Hazardous Emissions or Handle Hazardous Materials Within One-Quarter Mile of a School</p>	<p>HAZ-3: Vapor Intrusion Mitigation System (VIMS). If the post-remediation HHRA outlined in HAZ-2 shows risk greater than 1:1,000,000, a passive sub-slab Vapor Intrusion Mitigation System (VIMS) shall be installed beneath the future warehouse building. The VIMS will generally consist of the following components (from bottom to top): (1) Gravel bed above the certified pad; (2) Horizontal perforated piping within the gravel bed to capture and convey residual vapors; (3) Spray-applied barrier above the gravel bed and below the building slab; and (4) Vertical risers to vent vapors to the atmosphere above the roof line.</p> <p>If the VIMS is determined to be necessary, it shall be designed by a qualified professional engineer (P.E.) licensed in California. The VIMS design will be finalized prior to the start of building construction.</p> <p>The VIMS system shall be designed to allow regular monitoring of vapor concentrations. After occupancy,</p>	<p>Project Proponent and Contractor</p> <p>City of Redlands Development Services Department</p>	<p>Review of remediation report by City staff.</p>	<p>Prior to issuance of grading/ construction permits.</p> <p>Field verification prior to grading and during construction.</p>		

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	<p>monitoring shall be conducted and documented quarterly for the first year, semi-annually the second year, and annually thereafter for five years.</p> <p>The installation and monitoring of the VIMS system shall be under the oversight of the City Engineering Department in consultation with the County Fire Department, Hazardous Materials Division as the Certified Unified program Agency (CUPA) for the County.</p>					
<p>Significant Hazard as a Result of Routine Transport, Use, or Disposal of Hazardous Materials</p> <p>Significant Hazard as a Result of Reasonable Foreseeable Upset and Accident Conditions</p> <p>Emit Hazardous Emissions or Handle Hazardous Materials Within</p>	<p>HAZ-4: Soil Management Plan (SMP). After remediation is complete and prior to grading and earth movement, a Soil Management Plan (SMP) shall be prepared to provide protocols and procedures if unexpected or unknown subsurface conditions are encountered at the project site. The SMP will be shared with all contractors involved with earth movement and import activities, if any. The SMP will identify parties to be contacted if unexpected or unknown conditions are encountered, including an environmental professional and regulatory agencies if necessary</p>	<p>Project Proponent and Contractor</p> <p>City of Redlands Development Services Department</p>	<p>Evidence of submittal of a Soil Management Plan to the project contractors shall be provided to City staff and kept on file.</p>	<p>Prior to issuance of grading/ construction permits.</p> <p>Field verification prior to grading and during construction.</p>		

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One-Quarter Mile of a School	(e.g., if an underground storage tank is encountered).					
TRIBAL CULTURAL RESOURCES						
<p>Substantial Change in the Significance of a Tribal Cultural Resource that is Listed or Eligible for Listing in a Historic Registry.</p> <p>Substantial Change in the Significance of a Tribal Cultural Resource that is a Resource Determined to be Significant Pursuant to Public Resources Code Section 5024.1.</p>	<p>TCR-1: Cultural Resources Monitoring and Treatment. The Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, as detailed in CUL-1, of any pre-contact and/or historic-era cultural resources discovered during project implementation and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a cultural resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with YSMN, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents YSMN for the remainder of the project, should</p>	<p>Construction Contractor</p> <p>City of Redlands Development Services Department</p>	<p>Review of cultural resources survey/ monitoring logs by City staff.</p>	<p>Prior to issuance of grading/ construction permits.</p> <p>Field verification prior to grading and during construction.</p>		

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	YSMN elect to place a monitor on-site.					
<p>Substantial Change in the Significance of a Tribal Cultural Resource that is Listed or Eligible for Listing in a Historic Registry.</p> <p>Substantial Change in the Significance of a Tribal Cultural Resource that is a Resource Determined to be Significant Pursuant to Public Resources Code Section 5024.1.</p>	<p>TCR-2: Archaeological Documentation. Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to YSMN. The Lead Agency and/or applicant shall, in good faith, consult with YSMN throughout the life of the project.</p>	<p>Construction Contractor/ Project Proponent</p> <p>City of Redlands Development Services Department</p>	<p>Review of cultural resources survey/ monitoring logs by City staff.</p>	<p>Prior to issuance of grading/ construction permits.</p> <p>Field verification prior to grading and during construction.</p>		

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