

301 Tennessee Street Warehouse Project Initial Study and Mitigated Negative Declaration

Lead Agency:

City of Redlands
35 Cajon St., Ste. 20/P.O. Box 3005
Redlands, CA 92373
Office 909.798.7555 ext. 7344



Prepared by:

MIG, Inc.
1650 Spruce Street, Suite 106
Riverside, California 92507



Public Review Draft
May 1, 2023

- This document is designed for double-sided printing -

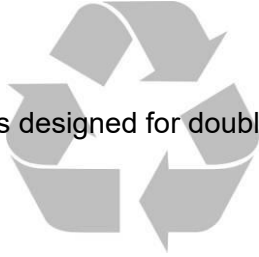


Table of Contents

1 Introduction.....	1
1.1 – Purpose of CEQA	1
1.2 – Public Comments	2
2 Project Description.....	3
2.1 – Project Title	3
2.2 – Lead Agency Name and Address	3
2.3 – Contact Person and Phone Number	3
2.4 – Project Location	3
2.5 – Project Sponsor’s Name and Address	3
2.6 – General Plan Land Use Designation.....	3
2.7 – Zoning District	3
2.8 – Project Description.....	3
2.9 – Surrounding Land Uses	5
2.10 – Environmental Setting	5
2.11 – Required Approvals.....	5
2.12 – Other Public Agency Whose Approval is Required.....	6
3 Determination	15
3.1 – Environmental Factors Potentially Affected	15
3.2 – Determination.....	15
4 Evaluation of Environmental Impacts	17
4.1 – Aesthetics	17
4.2 – Agriculture and Forest Resources.....	19
4.3 – Air Quality	21
4.4 – Biological Resources.....	30
4.4 – Cultural Resources.....	33
4.5 – Energy.....	35
4.6 – Geology and Soils.....	39
4.7 – Greenhouse Gas Emissions	43
4.8 – Hazards and Hazardous Materials.....	52
4.9 – Hydrology and Water Quality	59
4.10 – Land Use and Planning.....	63
4.11 – Mineral Resources	64
4.12 – Noise.....	65
4.13 – Population and Housing.....	72
4.14 – Public Services.....	73
4.15 – Recreation.....	75
4.16 – Transportation.....	76
4.17 – Tribal Cultural Resources.....	82
4.18 – Utilities and Service Systems	85
4.18 – Wildfire	88
4.19 – Mandatory Findings of Significance	90
5 Mitigation Summary	97
6 References	101
6.1 – List of Preparers.....	101
6.2 – Persons and Organizations Consulted.....	101
6.3 – Bibliography	102

List of Tables

Table 1 Surrounding Land Uses5
 Table 2 Tentative Project Construction Schedule23
 Table 3 Diesel Construction Equipment Utilized by Construction Phase24
 Table 4 Project Construction Emissions24
 Table 5 Project Operational Emissions26
 Table 6 Unmitigated Health Risks from Project Construction to Off-Site Receptors27
 Table 7 Mitigated Health Risks from Project Construction to Off-Site Receptors27
 Table 8 Health Risks from Project Operation to Off-Site Receptors28
 Table 9 Proposed Project Energy Consumption Estimates During Construction36
 Table 10 Energy Consumption Estimates During Project Operation37
 Table 11 Construction Greenhouse Gas Emissions45
 Table 12 Greenhouse Gas Emissions46
 Table 13 Project Consistency with City of Redlands GHG Reduction Measures47
 Table 14 Typical Construction Equipment Noise Levels66
 Table 15 Potential Construction Noise Impacts at Nearest Receptor67
 Table 16 Vibration Source Amplitudes for Construction Equipment70
 Table 17 Potential Construction Vibration Annoyance Impacts at Nearest Receptor70
 Table 18 Potential Construction Vibration Damage Impacts at Nearest Receptor71
 Table 19 Proposed Project Trip Generation77

List of Exhibits

Exhibit 1 Regional Context Map7
 Exhibit 2 Regional Context Map9
 Exhibit 3 Project Vicinity Map11
 Exhibit 4 Conceptual Site Plan13

List of Appendices

Appendix A Air Quality, Health Risk, Greenhouse Gas, and Energy Impact Report
 Appendix B Historical/Archaeological Resources Survey Report
 Appendix C Phase I Environmental Site Assessment
 Appendix D Noise and Vibration Impact Analysis
 Appendix E Measure U Focused Traffic Analysis and VMT Screening Analysis

1 Introduction

The City of Redlands (Lead Agency) received an application from Prologis Inc. (applicant) for the redevelopment of an existing industrial warehouse site with a 197,397-square foot Class A light industrial building which includes 8,000-square foot of office space on approximately 10.98 acres of land in the City of Redlands, California. The approval of the application constitutes a *project* that is subject to review under the California Environmental Quality Act (CEQA) 1970 (Public Resources Code §§ 21000, *et seq.*), and the CEQA Guidelines (14 California Code of Regulations §§ 15000, *et. seq.*).

This Initial Study was prepared to assess the short-term, long-term, and cumulative environmental impacts resulting from the proposed project. This report was prepared to comply with CEQA Guidelines § 15063, which sets forth the required contents of an Initial Study. These include:

- A description of the project, including the location of the project (See Section 2);
- Identification of the environmental setting (See Section 2.10);
- Identification of environmental effects by the use of a checklist, matrix, or other methods, provided that entries on the checklist or other form are briefly explained to indicate that there is some evidence to support the entries (See Section 4);
- Discussion of ways to mitigate significant effects identified, if any (See Section 4);
- Examination of whether the project is compatible with existing zoning, plans, and other applicable land use controls (See Section 4.11); and
- The name(s) of the person(s) who prepared or participated in the preparation of the Initial Study (See Section 5).

1.1 – Purpose of CEQA

CEQA § 21000 of the California Public Resources Code provides as follows:

The Legislature finds and declares as follows:

- a) The maintenance of a quality environment for the people of this state now and in the future, is a matter of statewide concern.
- b) It is necessary to provide a high-quality environment that at all times is healthful and pleasing to the senses and intellect of man.
- c) There is a need to understand the relationship between the maintenance of high-quality ecological systems and the general welfare of the people of the state, including their enjoyment of the natural resources of the state.
- d) The capacity of the environment is limited, and it is the intent of the Legislature that the government of the state take immediate steps to identify any critical thresholds for the health and safety of the people of the state and take all coordinated actions necessary to prevent such thresholds being reached.
- e) Every citizen has a responsibility to contribute to the preservation and enhancement of the environment.
- f) The interrelationship of policies and practices in the management of natural resources and waste disposal requires systematic and concerted efforts by public and private interests to enhance environmental quality and to control environmental pollution.
- g) It is the intent of the Legislature that all agencies of the state government which regulate activities of private individuals, corporations, and public agencies which are found to affect the quality of the environment, shall regulate such activities so that major consideration is given to preventing environmental damage while providing a decent home and satisfying living environment for every Californian.

The Legislature further finds and declares that it is the policy of the state to:

- h) Develop and maintain a high-quality environment now and in the future, and take all action necessary to protect, rehabilitate, and enhance the environmental quality of the state.
- i) Take all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive noise.
- j) Prevent the elimination of fish or wildlife species due to man's activities, ensure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities and examples of the major periods of California history.
- k) Ensure that the long-term protection of the environment, consistent with the provision of a decent home and suitable living environment for every Californian, shall be the guiding criterion in public decisions.
- l) Create and maintain conditions under which man and nature can exist in productive harmony to fulfill the social and economic requirements of present and future generations.
- m) Require governmental agencies at all levels to develop standards and procedures necessary to protect environmental quality.
- n) Require governmental agencies at all levels to consider qualitative factors as well as economic and technical factors and long-term benefits and costs, in addition to short-term benefits and costs, and to consider alternatives to proposed actions affecting the environment.

A concise statement of legislative policy, with respect to public agency consideration of projects for some form of approval, is found in CEQA § 21002, quoted below:

The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects. The Legislature further finds and declares that in the event that specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.

1.2 – Public Comments

Comments from all agencies and individuals are invited regarding the information contained in this Initial Study. Such comments should explain any perceived deficiencies in the assessment of impacts in the Initial Study. To request an appointment to review these materials, please contact:

Sean Reilly, Principal Planner
City of Redlands, Planning Department
35 Cajon Street, Suite 15-A
Redlands, California 92373
909-798-7555

All written comments received during the 30-day public review period for the Initial Study/Mitigated Negative Declaration will be considered by the City of Redlands prior to adoption.

2 Project Description

2.1 – Project Title

301 Tennessee Street Warehouse Project

2.2 – Lead Agency Name and Address

City of Redlands
Planning Department
35 Cajon Street, Suite 15-A
Redlands, California 92373
909-798-7555

2.3 – Contact Person and Phone Number

Sean Reilly, Principal Planner
909-798-7555, ext. 7344

2.4 – Project Location

The project site is made up of two parcels located on the northwest corner of State Street and Tennessee Street in the City of Redlands, California. (See Exhibit 1 Project Location Map). The surrounding uses include commercial/industrial uses north of the project site, and light industrial uses to the east, west and south of the site.

- Latitude 34° 03' 27" North, Longitude 117° 12' 02" West
- APNs #0292-192-11-0000 and 0292-192-14-0000

2.5 – Project Sponsor's Name and Address

Prologis Inc.
3546 Concourse St. Suite 100
Ontario, CA 91764

2.6 – General Plan Land Use Designation

Light Industrial

2.7 – Zoning District

Industrial District (I-P)

2.8 – Project Description

The project includes demolition of an existing manufacturing warehouse and a single-family house, and the construction of a 197,397 square foot light industrial building and associated parking and landscaping improvements. The approximately 10.98 acre site encompasses two parcels, located at the northwest corner of State Street and Tennessee Street in the City of Redlands, California. (APNs

#0292-192-11-0000 and 0292-192-14-0000) (see Exhibits 1-4). The proposed light industrial building would be 189,397 square feet with 8,000 square feet of first and second floor office space totaling 197,397 square feet. Based on the preliminary grading plans, the project would require approximately 23,154 cubic yards of soil import.

Architecture & Fencing

Eight-foot-high decorative walls are proposed around the perimeter of the truck yard area to screen operations from the outside of the project site. The truck entrances located on Kansas Street and Tennessee street would be fenced with eight-foot-high wrought iron fencing.

Landscaping

The proposed project includes approximately 84,845 square feet of ornamental landscaping that would cover 18% of the site. Landscaping would be visible from Kansas street along the west side of the site, Tennessee Street along the east, State Street on the south, and the Orange Blossom Trail that runs along the north face of the project site. The proposed landscaping would include 24-inch and 36-inch box trees, various shrubs, and ground covers to screen the proposed building, and parking and loading areas from off-site viewpoints.

Access and On-Site Circulation

Passenger vehicle access to the project site would be provided via a 30-foot-wide driveway on the east side of the site on Tennessee Street. Primary truck access to the project site would be provided via a 40-foot-wide driveway on the west side of the site along Kansas Street and via one 40-foot-wide driveway on the east side of the site on Tennessee Street. Secondary truck access would be provided via one 40-foot-wide driveway on the south side of the site on State Street. Emergency vehicle access would be provided through the parking lot and around the building with a 30-foot fire lane.

Drainage and Wet Utilities

The proposed project would install new onsite water and sewer lines that would connect to the existing infrastructure in the surrounding streets. Drainage from the proposed project would surface flow through the site and use catch basins and landscape drains to collect for treatment. The subsurface storm drain would be used to convey flows into a proposed underground chamber infiltration system. The underground chambers would be located in the northwesterly landscape area and would fully infiltrate the water volume to the surrounding water system.

Building Operations

The project site is within the light industrial (LI) general plan land use designation and industrial district zone (I-P). The light industrial general plan land use designation allows for manufacturing, distribution, research, and development (R&D) industries, and ancillary commercial uses. The Industrial District (I-P) zoning allows for the development of all industrial uses which is conducive to employees and citizens of the community. Typical operations of the project site may include employees and customers travelling to and from the facility, delivery of materials to the site, and truck loading and unloading. Approximately 10% of warehouse operations would involve cold storage. The project is anticipated to operate 24-hours a day, 7 days per week.

Construction Schedule

Construction activities for the project include demolition, site preparation, grading, building construction, paving, and architectural coatings. Demolition of the existing structures would take three (3) months to complete. Construction of the new building will take nine (9) months. Paving and landscaping would take one (1) month. Additionally, all offsite improvements would take one (1) month. The project would require approximately 24,477 cubic yards of soil import.

2.9 – Surrounding Land Uses

Surrounding land uses are summarized in Table 1.

Table 1
Surrounding Land Uses

Direction	Zoning Designation	Zoning District	Existing Land Use
Project Site	Light Industrial	I-P (Industrial District)	Former La-Z-Boy Facility Single Family Home
North	Office	I-P (Industrial District) M-1(Light Industrial District) C-M (Commercial Industrial) FP-1 (Flood Plan District)	Commercial Shopping Center
South	Light Industrial	I-P (Industrial District)	Industrial Warehouse (SCE Service Center)
East	Light Industrial	A-P (Administrative and Professional Office District) M-P (Planned Industrial District)	Undeveloped land/graded land used for parking
West	Office	EV/IC – (Commercial Industrial)	Industrial Warehouse

2.10 – Environmental Setting

The project is located on an irregularly shaped property approximately 10.98 acres in size on two parcels in a developed area of the City of Redlands, California. It is currently developed with an existing 193,469 square foot former La-Z-Boy Facility manufacturing warehouse and a non-conforming single-family house that is not occupied. The facility was occupied by La-Z-Boy until October 2019, and was subsequently purchased by Esri, a geographic information systems supplier in January 2020. The property was listed for purchase and bought again on April 5th, 2022. *The existing tenant is a 3PO (3rd party logistics operator) for clothing distribution to major retailers such as Macy's, Target, Amazon, etc. Their hours of operation are 7am to 5pm Monday through Friday.* The property is well maintained with medium-sized trees distributed throughout the property, hedges, and grass with minimal weeds. The project site is flat, with an approximate elevation of 1,358 feet above mean sea level (AMSL). Regional access to the project site is provided by the Interstate 10 Freeway (I-10) located approximately 0.6 miles north.

2.11 – Required Approvals

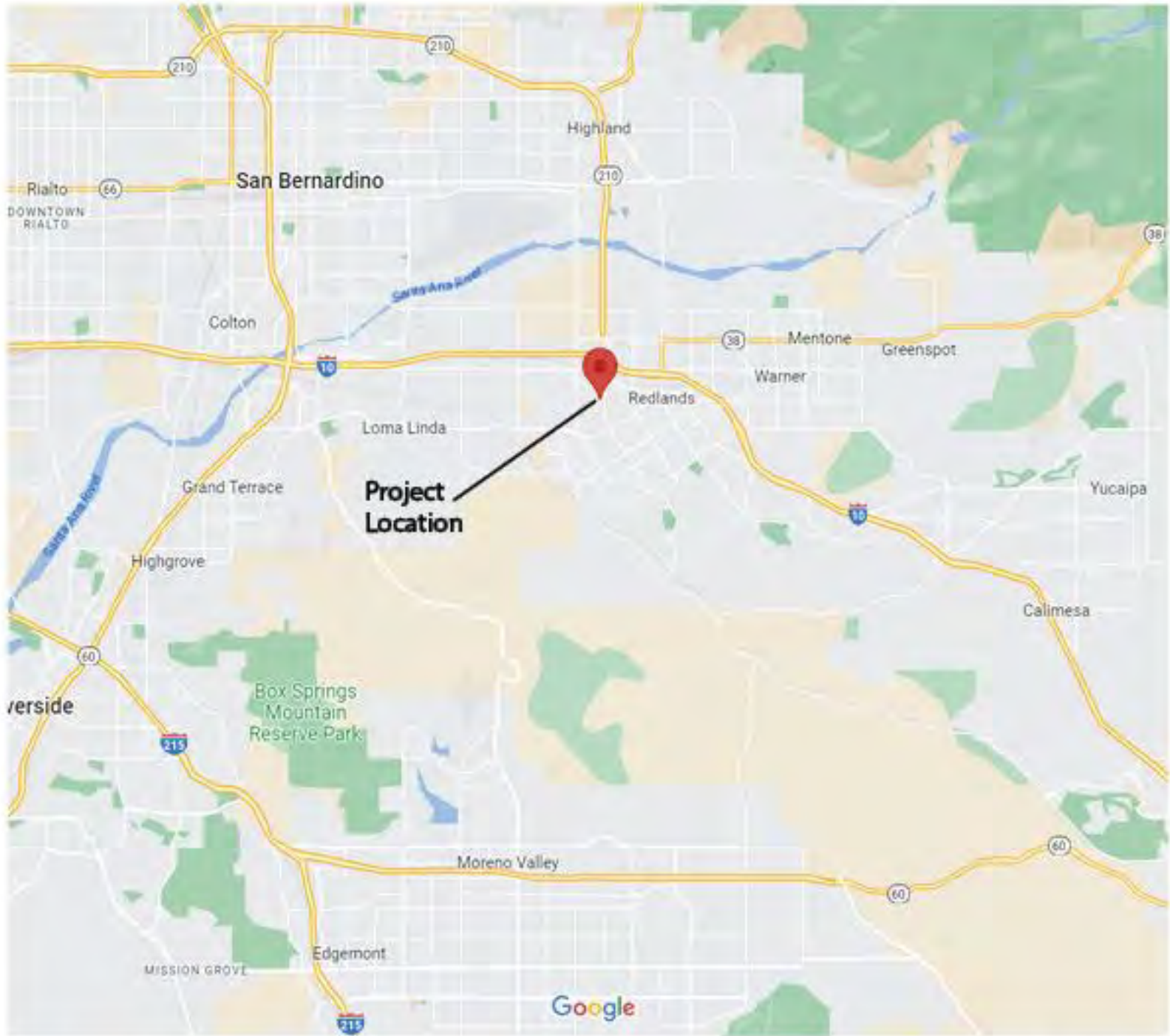
Various permits, approvals, and actions by the City of Redlands and various public agencies may be required to execute and implement the proposed project. The permits from the lead agency that are necessary include:

- Planning Commission Review and Approval No. 948
- Conditional Use Permit No. 1181
- Demolition Permit No. 371
- Demolition Permit No. 373
- Parcel Merger No. 6
- Compliance with the requirements of CEQA

- Building Permit

2.12 – Other Public Agency Whose Approval is Required

- N/A



Source: Google Maps



<http://www.nlg.com> • 951-787-9222

Exhibit 1 Regional Context Map

Tennessee Street Warehouse Project
Redlands, California



This Page Intentionally Left Blank.



301 Tennessee St
Project Location

Legend
Project Boundary 



Exhibit 2 Project Vicinity Map
Tennessee Street Warehouse Project
Redlands, California



This Page Intentionally Left Blank.

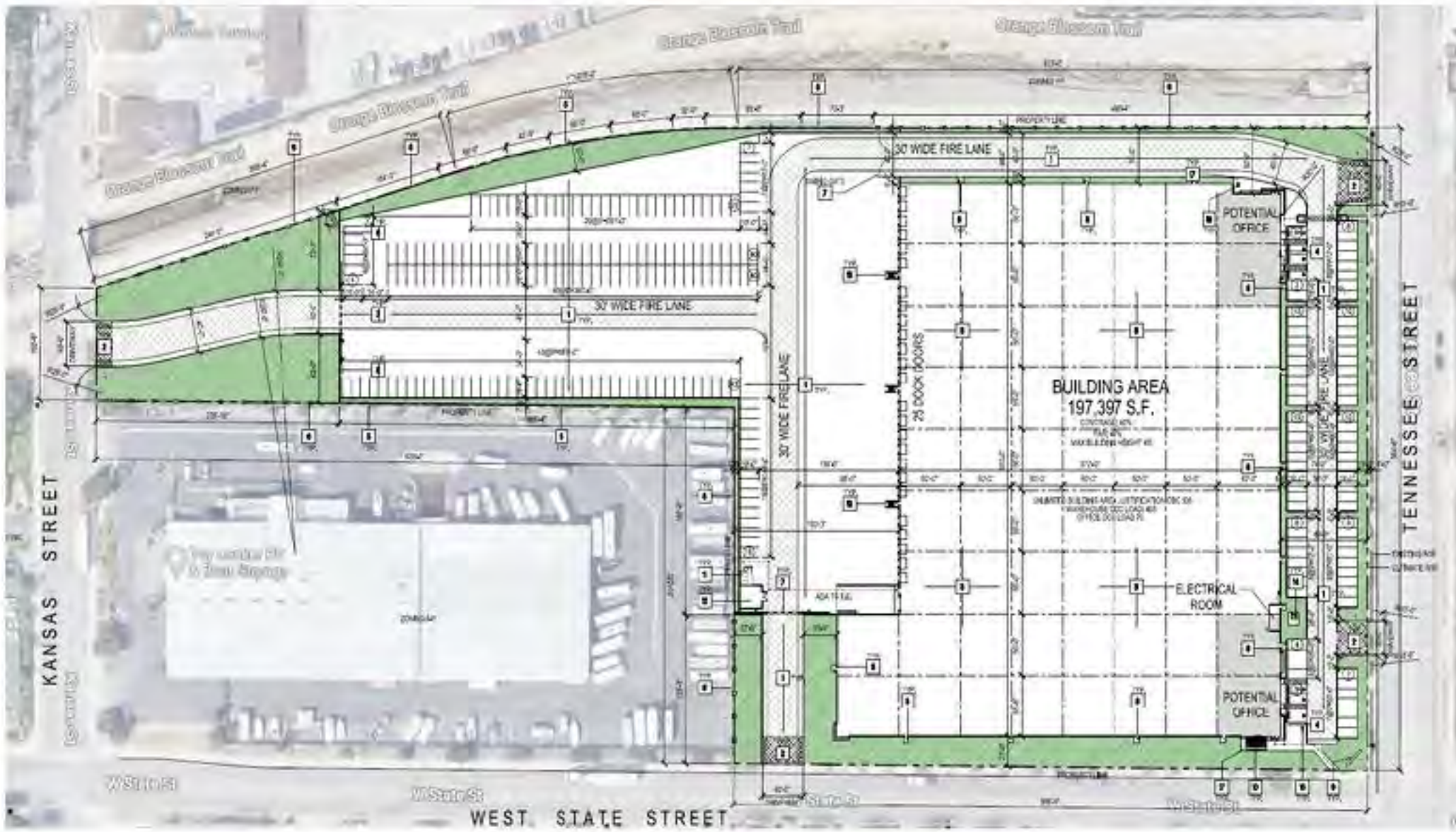
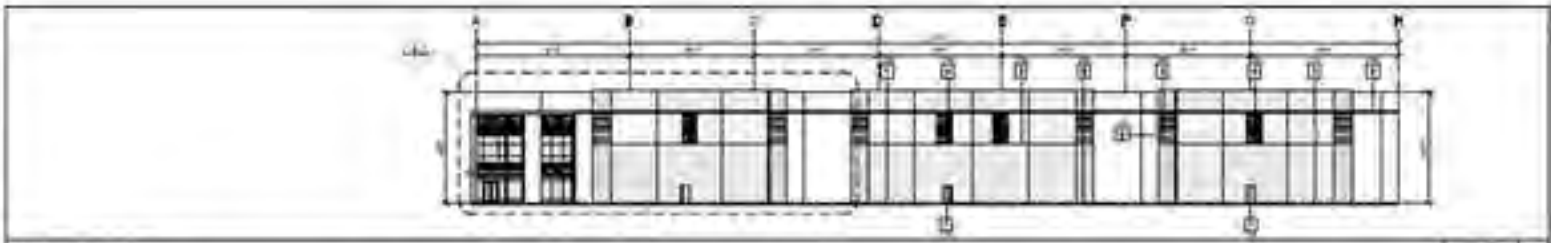


Exhibit 3 Site Plan
 Tennessee Street Warehouse Project
 Redlands, California

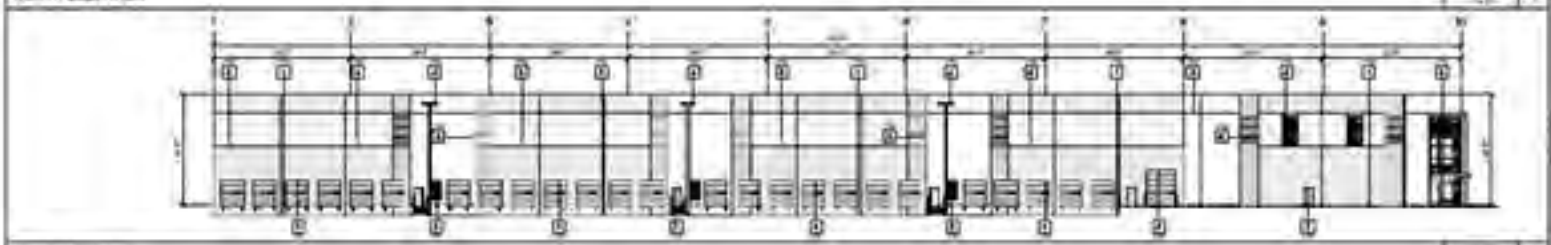


This Page Intentionally Left Blank.



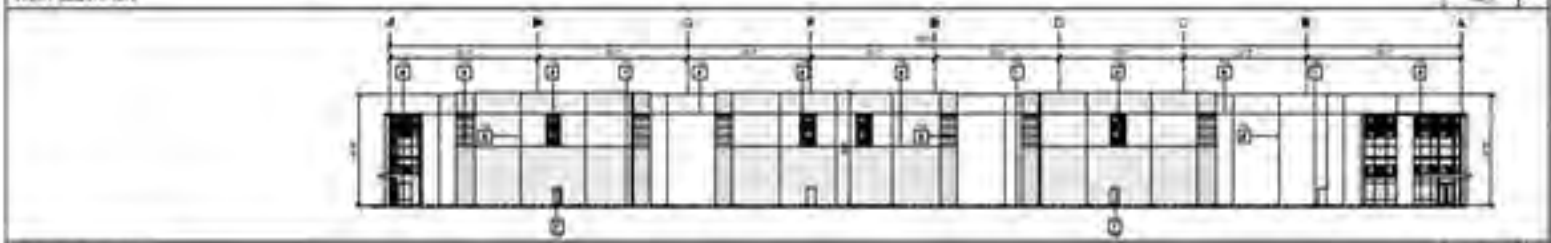
NORTH ELEVATION

1



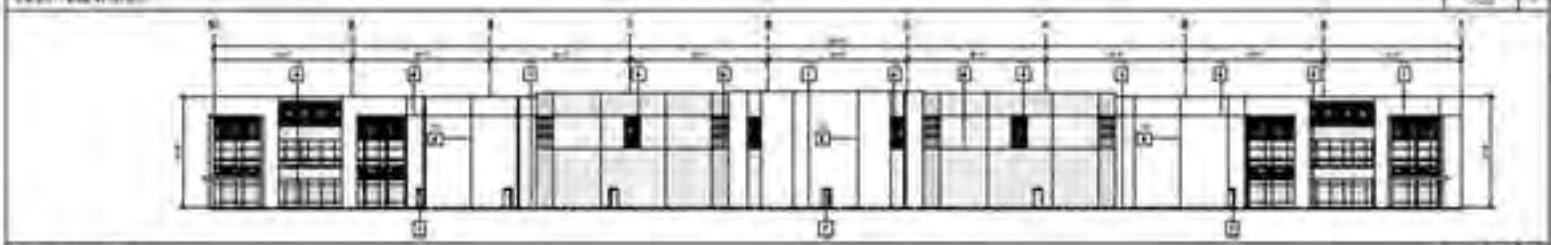
WEST ELEVATION

2



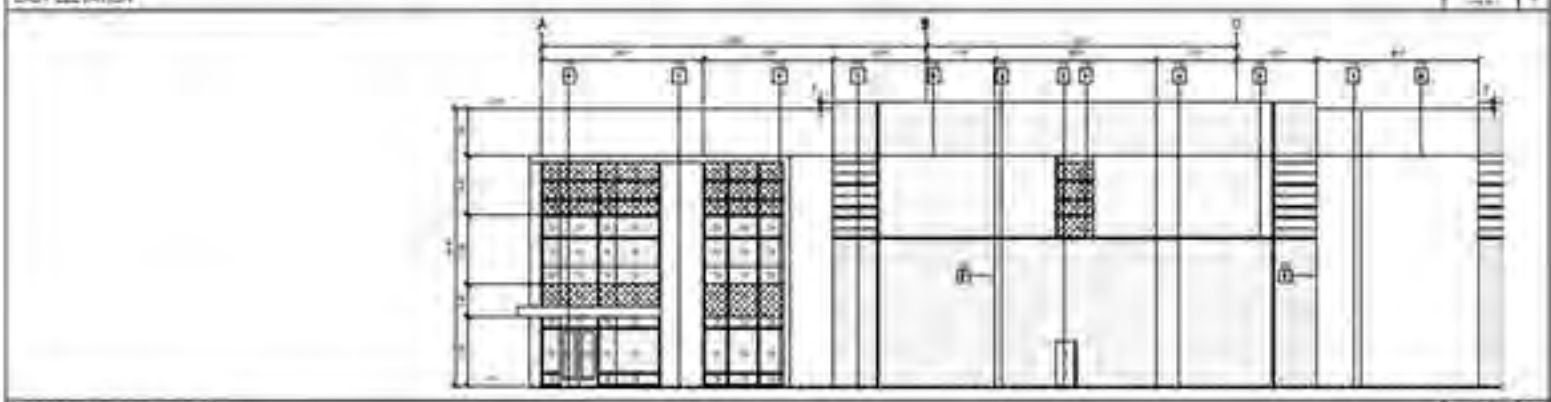
SOUTH ELEVATION

3



EAST ELEVATION

4



ENLARGED NORTH ELEVATION

5

<http://www.mig.com> • 951-787-9222



Exhibit 4 Project Elevations

Tennessee Street Warehouse Project
Redlands, California

This Page Intentionally Left Blank.

3 Determination

3.1 – Environmental Factors Potentially Affected

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

<input type="checkbox"/>	Aesthetics	<input type="checkbox"/>	Agriculture Resources	<input checked="" type="checkbox"/>	Air Quality
<input checked="" type="checkbox"/>	Biological Resources	<input checked="" type="checkbox"/>	Cultural Resources	<input type="checkbox"/>	Energy
<input checked="" type="checkbox"/>	Geology /Soils	<input type="checkbox"/>	Greenhouse Gas Emissions	<input checked="" 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 type="checkbox"/>	Transportation/Traffic	<input checked="" type="checkbox"/>	Tribal Cultural Resources
<input type="checkbox"/>	Utilities / Service Systems	<input type="checkbox"/>	Wildfire	<input type="checkbox"/>	Mandatory Findings of Significance

3.2 – Determination

<input type="checkbox"/>	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
<input checked="" type="checkbox"/>	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.
<input type="checkbox"/>	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
<input type="checkbox"/>	I find that the proposed project MAY have a 'potentially significant impact' or 'potentially significant unless mitigated' impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
<input type="checkbox"/>	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) 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.

Name: Sean Reilly, Principal Planner

Date

This Page Intentionally Left Blank.

4 Evaluation of Environmental Impacts

4.1 – Aesthetics

Except as provided in Public Resources Code Section 21099, would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within view from a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public view are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Less than Significant Impact. Scenic vistas can generally be defined as natural landscapes that form views of unique flora, geologic, or other natural features that are generally free from urban intrusions. Such resources can be impacted when a structure is built that blocks the view of the vista, or if a development is built on the vista itself. Typical scenic vistas include views of mountains and hills, large, uninterrupted open spaces, and bodies of water. Scenic vistas generally play a large role in the way a community defines itself and effects development patterns as projects are designed to take advantage of viewsheds.

Redland’s visual character is tied to its surrounding open space areas, and as such is incorporated into the City’s General Plan. The City has overtime acquired open space land around Redlands and incorporated it into a concept called the “Emerald Necklace”; a series of open space and park areas surrounding the City connected by scenic trails and roads. Areas within the City’s Planning Area include 254 acres of the San Timoteo Canyon south of the City called the “San Timoteo Nature Sanctuary”. Also, to the south, the City owns 338 acres of Live Oak Canyon, 245 acres of which is specifically set aside for conservation. The 4,000 acres of the Santa Ana River Wash makes up the northern boundary of the City, and is owned by multiple stakeholders including Federal, State, and local governments,

utilities, and private groups. The Crafton Hills Open Space makes up part of the eastern portion of the City's Planning Area, and with a general elevation above 2,400 feet, the area is valuable to the City as natural habit and scenic resource. The General Plan ensures the preservation of Redlands' open space corridors and limits development on and around those areas to preserve its visual character and limit encroachment. The General Plan does not designate any scenic vistas within the City. The project site is located in a developed area of the city and is zoned for light industrial uses. Surrounding zoning uses include industrial, commercial, and high-density residential uses. The project is located in an urbanized area, and fits the zoning designated by the City. Furthermore, the project would follow the City's Zoning and Building Codes and will not exceed the City's 50-foot height limit on light industrial zoning, and as such will fit the character of the area as regulated by the City. The proposed project would not constitute any significant loss of visibility to Redlands' scenic vistas as the area's developed industrial setting limits existing scenic vistas. Impacts to the visibility of scenic vistas in Redlands would be less than significant.

b) No Impact. There are no State Scenic Highways on or near the project site, and the site is not visible to a designated state scenic highway as identified on the California Scenic Highway Mapping System. The nearest officially designated scenic highways are California State Route 243 just outside of Banning, and California State Route 38 near Big Bear Lake; the former starting approximately 24 miles southeast of the project site. As of this document being written, State Route 38 in Redlands has not been officially designated but is eligible. The City Council has designated a number of corridors within the city as scenic highways, drives, and historic streets. Designated streets and those under consideration for designation are listed in the "Distinctive City" Element of the City's General Plan.¹ The project site is not located on or near any such corridors and would not impact the quality of those streets during construction or during long-term operations. No impacts would occur.

c) Less than Significant Impact. The proposed industrial facility building has been designed according to City design guidelines, including requirements for architectural quality, landscaping, and screening, and would be consistent in character and quality with the surrounding industrial and commercial developments. The project site would undergo visual changes consistent with an ongoing construction project and would temporarily change the visual character of the site and surrounding area. However, the project would not substantially degrade the existing visual character and qualities of the site and its surroundings and would have a less than significant impact.

d) Less than Significant Impact. Excessive or inappropriately directed lighting can adversely impact night-time views by reducing the ability to see the night sky and stars. Glare can be caused by unshielded or misdirected lighting sources, or reflective surfaces. Impacts associated with glare range from a simple nuisance to potentially dangerous. Sources of daytime glare are typically concentrated in commercial areas and associated parking areas that contain reflective materials such as hi-efficiency window glass, highly polished surfaces, and expanses of pavement.

Development of parking improvements, related lighting, and associated glare prevention would be conducted in accordance with design standards in the City of Redlands Code of Ordinances; Chapter 18.112.260: Dust, Heat, and Glare Restrictions.² Glare is not expected to result from the increase in pavement or from the warehouse building. Adhering to Redlands Code of Ordinances would ensure any impacts related to excessive or inappropriately directed lighting would be less than significant.

4.2 – Agriculture and Forest Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 (g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) No Impact. The California Important Farmland Finder prepared by the California Department of Conservation does not identify the project site as being located on prime farmland, unique farmland, or farmland of Statewide Importance.³ The City of Redlands General Plan does identify portions of the north and eastern city for Agricultural and Open Space uses. The project site is located away from any

land zoned for agricultural uses, and there would be no conversion of farmlands to non-agricultural uses, and as a result the project would have no impact.

b) No Impact. The project site is not located on land that is used for or conflicts with nearby agriculturally zoned land. The project site is currently zoned Industrial District (I-P) which does not allow for agricultural uses.⁴ The parcels comprising the project site are not involved in an active Williamson Act contract. There would be no conflict with existing zoning for agricultural use or a Williamson Act contract and therefore there would be no impact.

c) No Impact. Public Resources Code Section 12220(g) identifies forest land as *land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.* The project site and surrounding properties are not currently being managed or used for forest land as identified in Public Resources Code Section 12220(g). The project site is zoned Light Industrial for various industrial uses that include warehousing, office space, storage, and manufacturing. As such, development of the project would have no impact on any timberland or forestland zoning.

d) No Impact. As indicated in 4.2 c), the area is not designated as forest land; thus, there would be no loss of forest land or conversion of forest land to non-forest use as a result of the project. No impacts would occur.

e) No Impact. The project site is currently occupied by a warehouse facility and (1) one single family home and is zoned for light industrial uses. The surrounding zoning designations include industrial zoning to the south and west, industrial and commercial zoning to the north, administrative zoning to the east, and public/institutional zoning to the southwest. None of the surrounding sites contain existing agricultural or forest uses. The development of this proposed project would not change the existing environment in a manner that would result in the conversion of forest land to non-forest use. No impact would occur.

4.3 – Air Quality

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

An *Air Quality, Health Risk, Greenhouse Gas, and Energy Impact Report* was prepared for the proposed project by LSA, dated January 2023 (See Appendix A). The report estimates the potential air quality emissions for the proposed project and evaluates project emissions against applicable South Coast Air Quality Management District (SCAQMD)-recommended California Environmental Quality Act (CEQA) significance thresholds for construction and operation.

a) Less than Significant Impact. A consistency determination plays an essential role in local agency project review by linking local planning and unique individual projects to the air quality plans. A consistency determination fulfills the CEQA goal of fully informing local agency decision-makers of the environmental costs of the project under consideration at a stage early enough to ensure that air quality concerns are addressed. Only new or amended General Plan elements, Specific Plans, and significantly unique projects need to undergo a consistency review due to the air quality plan strategy being based on projections from local General Plans.

The SCAQMD Air Quality Management Plan (AQMP) is based on regional growth projections developed by Southern California Association of Governments (SCAG). The proposed project would include 197,397 square feet of warehouse use. The proposed project would not house more than 1,000 persons, occupy more than 40 acres of land, or encompass more than 650,000 square feet of floor area. Thus, the proposed project would not be defined as a regionally significant project under CEQA; therefore, it does not meet SCAG’s Intergovernmental Review criteria.

The City's General Plan is consistent with the SCAG Regional Comprehensive Plan Guidelines and the SCAQMD AQMP. Pursuant to the methodology provided in Chapter 12 of the SCAQMD CEQA Air Quality Handbook, consistency with the AQMP is affirmed if the project:

1. would not increase the frequency or severity of an air quality standards violation or cause a new violation
2. is consistent with the growth assumptions in the AQMP.

Consistency review is presented as follows:

Referring to Consistency Criterion 1; the project would result in short-term construction and long-term operational pollutant emissions that are all less than the CEQA significance emissions thresholds established by SCAQMD, as demonstrated below; therefore, the project would not result in an increase in the frequency or severity of an air quality standards violation or cause a new air quality standard violation.

Referring to Consistency Criterion 2; the CEQA Air Quality Handbook indicates that consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and significant projects. Significant projects include airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, water ports, solid waste disposal sites, and offshore drilling facilities; therefore, the proposed project is not defined as significant. In addition, the proposed project would not require a change to the General Plan land use designation or the current zoning and would be consistent with the City's General Plan and Zoning Ordinance. Therefore, the proposed project would be consistent with the growth assumptions set forth by SCAG and the AQMP.

Based on the consistency analysis presented above, the proposed project would be consistent with the regional AQMP, and impacts would be less than significant.

b) Less than Significant Impact. The Basin is designated as non-attainment for Ozone (O₃) and Particulate Matter less than 2.5 microns (PM_{2.5}) for federal standards and non-attainment for O₃, PM₁₀, and PM_{2.5} for State standards. The SCAQMD's nonattainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, the SCAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Therefore, additional analysis to assess cumulative impacts is unnecessary. The following analysis assesses the potential project-level construction- and operation-related air quality impacts.

Construction Emissions

During construction, short-term degradation of air quality may occur due to the release of particulate emissions generated by demolition, grading, paving, building, and other activities. Emissions from construction equipment are also anticipated and would include carbon monoxide (CO), nitrogen oxides (NO_x), sulfur oxides (SO_x), volatile organic compounds (VOCs), directly-emitted particulate matter (PM_{2.5} and PM₁₀), and toxic air contaminants (TACs) such as diesel exhaust particulate matter.

Project construction activities would include demolition, grading, site preparation, building, paving, and architectural coating activities. Construction-related effects on air quality from the proposed project would be greatest during the site preparation phase due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at the construction site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM₁₀ emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM₁₀ emissions would depend on soil moisture, silt content of soil, wind speed, and the amount of operating equipment. Larger dust particles would settle near the source, while fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. The SCAQMD has established Rule 403: Fugitive Dust, which would require the applicant to implement measures that would reduce the amount of particulate matter generated during the construction period.

In addition to dust-related PM₁₀ emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, SO₂, NO_x, VOCs and some soot particulate (PM_{2.5} and PM₁₀) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

Construction emissions were estimated for the project using CalEEMod. Table 2 lists the tentative project construction schedule beginning in June 2023 and ending in May 2024. Table 3 lists the potential construction equipment to be used during project construction under each phase of construction. Other precise details of construction activities are unknown at this time; therefore, default settings (e.g., construction equipment) from CalEEMod were assumed. Table 4 identifies the total annual emissions associated with construction activities. CalEEMod output sheets are included in Appendix A.

**Table 2
Tentative Project Construction Schedule**

Phase Number	Phase Name	Phase Start Date	Phase End Date	Number of Days/Week	Number of Days
1	Demolition	6/5/2023	8/31/2023	5	64
2	Site Preparation	9/1/2023	9/21/2023	5	15
3	Grading	9/22/2023	10/19/2023	5	20
4	Building Construction	10/20/2023	5/3/2024	5	141
5	Architectural Coating	2/26/2024	5/31/2024	5	70
6	Paving	5/6/2024	5/24/2024	5	15

Source: Compiled by LSA (November 2022).
¹ Overlap between building construction and architectural coating phases.

**Table 3
Diesel Construction Equipment Utilized by Construction Phase**

Construction Phase	Off-Road Equipment Type	Off-Road Equipment Unit Amount	Hours Used per Day	Horsepower	Load Factor
Demolition	Concrete/ Industrial Saws	1	8	81	0.73
	Excavators	3	8	158	0.38
	Rubber Tired Dozers	2	8	247	0.40
Site Preparation	Rubber Tired Dozers	3	8	247	0.40
	Tractors/Loaders/Backhoes	4	8	97	0.37
Grading	Excavators	2	8	158	0.38
	Graders	1	8	187	0.41
	Rubber Tired Dozers	1	8	247	0.40
	Scrapers	2	8	367	0.48
	Tractors/Loaders/Backhoes	2	8	97	0.37
Building Construction	Cranes	1	7	231	0.29
	Forklifts	3	8	89	0.20
	Generator Sets	1	8	84	0.74
	Tractors/Loaders/Backhoes	3	7	97	0.37
	Welders	1	8	46	0.45
Paving	Pavers	2	8	130	0.42
	Paving Equipment	2	8	132	0.36
	Rollers	2	8	80	0.38
Architectural Coating	Air Compressors	1	6	78	0.48

Source: Compiled by LSA using CalEEMod defaults (November 2022).
CalEEMod = California Emissions Estimator Model

**Table 4
Project Construction Emissions**

Project Construction	Maximum Pollutant Emissions (lbs./day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Demolition	1.4	34.3	25.7	<0.1	2.7	1.2
Site Preparation	1.3	33.8	23.6	<0.1	10.0	5.5
Grading	2.3	69.0	42.6	0.2	8.6	4.0
Building Construction	1.8	26.3	25.0	0.1	3.2	1.5
Architectural Coating	26.8	2.4	3.0	<0.1	0.5	0.2
Paving	1.4	20.1	17.8	<0.1	0.8	0.7
Maximum (lbs./day)	28.6	69.0	42.6	0.2	10.0	5.5
SCAQMD Thresholds	75.0	100.0	550.0	150.0	150.0	55.0
Exceeds?	No	No	No	No	No	No

Source: Compiled by LSA (January 2023).
Note: Maximum emissions of VOC occurred during the overlapping building construction and architectural coating phases.
CO = carbon monoxide lbs./day = pounds per day
SCAQMD = South Coast Air Quality Management District SO_x = sulfur oxides PM₁₀ = particulate matter less than 10 microns in size NO_x = nitrogen oxides
PM_{2.5} = particulate matter less than 2.5 microns in size VOC = volatile organic compounds

As shown in Table 4, construction emissions associated with the project would not exceed the SCAQMD thresholds for VOC, NO_x, CO, SO_x, PM_{2.5}, or PM₁₀ emissions. In addition to the construction period thresholds of significance, the project is required to comply with regional rules that assist in reducing short-term air pollutant emissions. SCAQMD Rule 403 requires that fugitive dust be controlled with best-available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, SCAQMD Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off site. Even though the project's construction would not exceed any of the emissions thresholds as noted in Table 4, compliance with Rule 403 dust suppression techniques can further reduce the fugitive dust generation (and thus, the PM₁₀ component). With compliance with Rule 403, construction of the proposed project would not result in emissions that would cause a cumulatively considerable net increase of any criteria pollutant for which the project is nonattainment under an applicable federal or State ambient air quality standard. Therefore, the proposed project would not lead to new or substantially more severe significant impacts associated with construction-related air quality, and as such, impacts would be less than significant.

Operational Emissions

Long-term air pollutant emission impacts are those associated with mobile sources (e.g., vehicle and truck trips), energy sources (e.g., natural gas), and area sources (e.g., architectural coatings and the use of landscape maintenance equipment) related to the proposed project. PM₁₀ emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways. Entrainment of PM₁₀ occurs when vehicle tires pulverize small rocks and pavement, and the vehicle wakes generate airborne dust. The contribution of tire and brake wear is small compared to the other PM emission processes. Gasoline-powered engines have small rates of PM emissions compared with diesel-powered vehicles. Energy source emissions result from activities in buildings for which electricity and natural gas are used. The quantity of emissions is the product of usage intensity (i.e., the amount of natural gas) and the emission factor of the fuel source. Major sources of energy demand for the proposed project could include building mechanical systems, such as heating and air conditioning. Typically, area source emissions consist of direct sources of air emissions located at the project site, including architectural coatings, consumer products, and the use of landscape maintenance equipment. Long-term operation emissions associated with the proposed project were calculated using CalEEMod. Model results are shown in Table 5 below. CalEEMod output sheets are included in Appendix A.

**Table 5
Project Operational Emissions**

Emission Type	Pollutant Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Existing Uses Operational Emissions						
Area Sources	4.6	<0.1	0.6	<0.1	0.1	0.1
Energy Sources	<0.1	0.1	0.1	<0.1	<0.1	<0.1
Mobile Sources	3.9	20.6	40.7	0.1	8.9	2.5
Total Project Emissions	8.5	20.7	41.4	0.1	9.0	2.6
Proposed Project Operational Emissions						
Area Sources	4.5	<0.1	<0.1	0.0	<0.1	<0.1
Energy Sources	<0.1	0.4	0.3	<0.1	<0.1	<0.1
Mobile Sources – Vehicles/Light Duty Trucks	1.5	4.8	21.0	0.1	7.3	2.0
Mobile Sources – Heavy Duty Trucks	0.6	34.0	8.1	0.2	6.0	1.9
Total Project Emissions	6.6	39.2	29.4	0.3	13.3	3.9
Net Total Emissions	-1.9	-18.5	-12.0	0.2	4.3	1.3
SCAQMD Thresholds	55.0	55.0	550.0	150.0	150.0	55.0
Significant?	No	No	No	No	No	No
Source: Compiled by LSA (January 2023).						
Note: Maximum emissions of VOC occurred during the overlapping building construction and architectural coating phases.						
CO = carbon monoxide			lbs/day = pounds per day			
SCAQMD = South Coast Air Quality Management District			SO _x = sulfur oxides			
PM ₁₀ = particulate matter less than 10 microns in size			NO _x = nitrogen oxides			
PM _{2.5} = particulate matter less than 2.5 microns in size			VOC = volatile organic compounds			

The results shown in Table 5 indicate the project would not exceed the significance criteria for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5} emissions; thus, the proposed project would not have a significant effect on regional air quality. Therefore, operation of the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project is nonattainment under an applicable federal or State ambient air quality standard. Impacts would be less than significant.

c) Less than Significant Impact with Mitigation Incorporated. Sensitive receptors are defined as people that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include schools, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential dwelling units. The closest sensitive receptor to the project site is Redlands Adventist Academy Kindergarten and Kids Care, located approximately 275 feet southeast of the project site’s southern boundary opposite West State Street. Other sensitive receptors include the Redlands Apartments, located approximately 900 feet southeast from the project site southern boundary.

The following section describes the potential impacts on sensitive receptors from construction and operation of the proposed project. Health risk impacts associated with project construction and operation are evaluated separately to correctly estimate the risk for each type of receptor (i.e., sensitive vs. worker locations, since sensitive receptors start at the 3rd trimester and workers start at age 16.) The risk is calculated starting at the 3rd trimester going to 30.25 years, which is broken down into three bins: 3rd trimester to under 2 years; 2 years to under 16 years; and 16 years to 30 years. This is consistent with OEHHA’s standard method of calculating a 30-year risk (i.e., the sum of all three bins). The Health Risk Assessment (HRA) analysis and results are presented below; data outputs are included in Appendix A.

Construction Health Risk Assessment

A construction HRA, which evaluates construction-period health risk to off-site receptors, was performed for the proposed project. Table 6, below, identifies the results of the analysis assuming the use of Tier 2 construction equipment, as proposed by the project, at the maximally exposed individual (MEI), which is the nearest sensitive receptor. Model snapshots of the sources are shown in Appendix A.

Table 6
Unmitigated Health Risks from Project Construction to Off-Site Receptors

Location	Carcinogenic Inhalation Health Risk in One Million	Chronic Inhalation Hazard Index	Acute Inhalation Hazard Index
Worker Receptor Risk	3.31	0.162	0.000
Sensitive Receptor Risk	13.92	0.011	0.000
Day Care Receptor Risk	14.03	0.015	0.000
SCAQMD Significance Threshold	10.0 in One Million	1.0	1.0
Significant?	Yes	No	No
Source: LSA (January, 2023). SCAQMD = South Coast Air Quality Management District			

As shown in Table 6, the maximum cancer risk for the day care receptor MEI would be 14.03 in one million and the sensitive receptor MEI would be 13.92 in one million, which would both exceed the SCAQMD cancer risk threshold of 10 in one million. The worker receptor risk would be lower at 3.31 in one million, which would not exceed the threshold. The total chronic hazard index would be 0.162 for the worker receptor MEI, 0.015 for the day care receptor, and 0.011 for the sensitive receptor MEI, which would all be below the threshold of 1.0. In addition, the total acute hazard index would be nominal (0.000), which would also not exceed the threshold of 1.0. As indicated above, the cancer risk of 14.03 in one million at the day care receptor and 13.92 in one million at the sensitive receptor would exceed SCAQMD thresholds. Therefore, implementation of **Mitigation Measure AIR- 1** would be required to reduce pollutant concentrations during project construction. Table 7 identifies the results of the analysis with implementation of **Mitigation Measure AIR-1**.

Table 7
Mitigated Health Risks from Project Construction to Off-Site Receptors

Location	Carcinogenic Inhalation Health Risk in One Million	Chronic Inhalation Hazard Index	Acute Inhalation Hazard Index
Worker Receptor Risk	0.59	0.030	0.000
Sensitive Receptor Risk	2.49	0.002	0.000
Day Care Receptor Risk	2.55	0.003	0.000
SCAQMD Significance Threshold	10.0 in One Million	1.0	1.0
Significant?	No	No	No
Source: LSA (January, 2023). SCAQMD = South Coast Air Quality Management District			

As shown in Table 7, the mitigated cancer risk at the day care receptor MEI would be 2.55 in one million and 2.49 in one million at the sensitive receptor MEI, which would not exceed the SCAQMD cancer risk of 10 in one million. Therefore, with implementation of **Mitigation Measure AIR-1**, construction of the

proposed project would not exceed SCAQMD thresholds and would not expose nearby sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant.

Operational Health Risk Assessment

To determine the potential health risk to people living and working near the proposed project associated with the exhaust of diesel-powered trucks and equipment, an operational HRA was conducted for the proposed project. The carcinogenic and chronic health risks from the proposed project are shown in Table 8. The residential risk incorporates both the risk for a child living in a nearby residence for 9 years (the standard period of time for child risk) and an adult living in a nearby residence for 30 years (considered a conservative period of time for an individual to live in any one residence). The HRA model snapshots and outputs are included in Appendix A.

**Table 8
Health Risks from Project Operation to Off-Site Receptors**

Location	Carcinogenic Inhalation Health Risk in One Million	Chronic Inhalation Hazard Index	Acute Inhalation Hazard Index
Worker Receptor Risk	7.69	0.020	0.000
Sensitive Receptor Risk	7.49	0.004	0.000
Day Care Receptor Risk	8.05	0.003	0.000
SCAQMD Significance Threshold	10.0 in one million	1.0	1.0
Significant?	No	No	No
Source: LSA (January, 2023). SCAQMD = South Coast Air Quality Management District			

As shown in Table 8, the maximum cancer risk for the day care receptor MEI would be 8.05 in one million and the cancer risk for the sensitive receptor MEI would be 7.49 in one million, which would both be less than the threshold of 10 in one million. The worker receptor risk would be 7.69 in one million. The total chronic hazard index would be 0.004 for the sensitive receptor MEI, 0.003 for the day care receptor MEI, and 0.020 for the worker receptor MEI, all of which are below the threshold of 1.0. In addition, the total acute hazard index would be nominal (0.000), which would also not exceed the threshold of 1.0. As these results show, all health risk levels to nearby residents, workers, and the day care from operation-related emissions of TACs would be well below the SCAQMD’s HRA thresholds. No significant health risk would occur from project operation emissions.

In December 2018, in the case of *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, (Friant Ranch) the California Supreme Court held that an air quality analysis must meaningfully connect the identified air quality impacts to the human health consequences of those impacts, or meaningfully explain why that analysis cannot be provided. As discussed in the SCAQMD Brief filed in the Friant Ranch case, correlating a project’s criteria air pollutant emissions to specific health impacts is challenging. The SCAQMD, which has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the State, and thus it is uniquely situated to express an opinion on how lead agencies should correlate air quality impacts with specific health outcomes noted that it may be “difficult to quantify health impacts for criteria pollutants.” SCAQMD used O₃ as an example of why it is impracticable to determine specific health outcomes from criteria pollutants for all but very large, regional-scale projects.

First, forming O₃ “takes time and the influence of meteorological conditions for these reactions to occur, so ozone may be formed at a distance downwind from the sources.” Second, “it takes a large amount of additional precursor emissions (NO_x and VOCs) to cause a modeled increase in ambient ozone

levels over an entire region,” with a 2012 study showing that “reducing NOx by 432 tons per day (157,680 tons/year) and reducing VOC by 187 tons per day (68,255 tons/year) would reduce ozone levels at the SCAQMD’s monitor site with the highest levels by only 9 parts per billion”

SCAQMD concluded that it “does not currently know of a way to accurately quantify ozone-related health impacts caused by NOx or VOC emissions from relatively small projects.” The San Joaquin Valley Air Pollution Control District (SJVAPCD) ties the difficulty of correlating the emission of criteria pollutants to health impacts to how ozone and particulate matter are formed, stating that “[b]ecause of the complexity of ozone formation, a specific tonnage amount of NOx or VOCs emitted in a particular area does not equate to a particular concentration of ozone in that area.” Similarly, the tonnage of PM “emitted does not always equate to the local PM concentration because it can be transported long distances by wind,” and “[s]econdary PM, like ozone, is formed via complex chemical reactions in the atmosphere between precursor chemicals such as SOx and NOx,” meaning that “the tonnage of PM-forming precursor emissions in an area does not necessarily result in an equivalent concentration of secondary PM in that area.” The disconnect between the amount of precursor pollutants and the concentration of ozone or PM formed makes it difficult to determine potential health impacts, which are related to the concentration of ozone and PM experienced by the receptor rather than levels of NOx, SOx, and VOCs produced by a source.

Most local agencies lack the data to do their own assessment of potential health impacts from criteria air pollutant emissions, as would be required to establish customized, locally specific thresholds of significance based on potential health impacts from an individual development project. The use of national or “generic” data to fill the gap of missing local data would not yield accurate results because such data does not capture local air patterns, local background conditions, or local population characteristics, all of which play a role in how a population experiences air pollution. Because it is impracticable to accurately isolate the exact cause of a human disease (for example, the role a particular air pollutant plays compared to the role of other allergens and genetics in cause asthma), existing scientific tools cannot accurately estimate health impacts of the project’s air emissions without undue speculation. As previously stated, no significant health risk would occur from project operation emissions, and as such, impacts would be less than significant.

d) Less than Significant Impact. According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints include agricultural operations, wastewater treatment plants, landfills, and certain industrial operations (such as manufacturing uses that produce chemicals, paper, etc.). During project construction, some odors may be present due to diesel exhaust. However, these odors would be temporary and limited to the construction period. The proposed project would not include any activities or operations that would generate objectionable odors and once operational, the project would not be a source of odors. Therefore, the proposed project would not result in other emissions (such as those leading to odors) affecting a substantial number of people. Impacts would be less than significant.

Mitigation Measures

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.

4.4 - Biological Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

a) Less than Significant Impact. The project site is significantly disturbed and is almost completely developed. The site is occupied by a residential property and the old La-Z-Boy facility. The Project site is not identified as critical habitat for any sensitive, threatened, or endangered species. Landscaping currently exists onsite; however, the ornamental vegetation is not native habitat. Onsite vegetation includes landscape ornamental trees, and shrubs. Considering the highly developed and disturbed nature of the project site the proposed project would not result in any significant impacts to sensitive species or their habitats.

Special-Status Plants

No special-status plant species are expected to be present on the project site due to the extent of current development and subsequent lack of suitable habitat; therefore, no impacts to special-status plants are anticipated as a result of project implementation.

Special Status Wildlife Species

Special-status wildlife species include those species listed as endangered or threatened under the Federal Endangered Species Act (FESA) or the California Endangered Species Act (CESA); candidates for listing by the U.S. Fish and Wildlife Services or California Department of Fish and Wildlife (USFWS & CDFW respectively); and species of special concern to the CDFW; and birds protected by the CDFW under California Fish and Game Code (CFGC) Sections 3503 and 3513.

No special-status wildlife species are expected to be impacted by project construction due to a lack of suitable habitat and high degree of site disturbance from existing development within and surrounding the project site.

b) No Impact. The project site is located in a heavily developed area of Redlands, and no riparian vegetation or other sensitive natural habitats are present on the project site as indicated in the City’s General Plan.⁵ Furthermore, no such features were detected by the National Wetlands Inventory at or near the project site.⁶ As such, there will be no impacts.

c) No Impact. No state or federally protected wetlands or similar waterways are present on the project site. No wetlands were identified by the National Wetlands Inventory, or the City’s General Plan at or near the project site.⁷ There is a human-made channel, the Mission Channel, that moves seasonal stream waters immediately north of the project. The proposed project would not impact this waterway as project disturbances would not extend beyond the site boundary. Therefore; there would be no impacts related to wetlands.

d) Less than Significant with Mitigation Incorporated. The City does not maintain any wildlife corridors and the project site is surrounded on all sides by development and surface street features. The Federal Migratory Bird Treaty Act (MBTA; 16 USC sections 703–711) and California Fish and Game Code (CFGC) sections 3503, 3503.5, and 3513 extend protection to many avian species known to occur in the project area. The Eucalyptus trees that would be removed as part of the proposed project are ornamental; however, ornamental trees still have the potential to provide nesting habitat for bird species protected by the CFGC sections 3503 and 3513. In addition, there is potential

for tree-nesting birds to establish nests in the Eucalyptus trees prior to project-related construction. The loss of an active nest of common or special-status bird species and/or their eggs or young as a result of project construction would be considered a violation of the CFGC, section 3503, 3503.5, 3513 and therefore, would be considered a potentially significant impact. Therefore, implementation of **Mitigation Measure BIO-1** would be required to reduce impacts to nesting birds to a less than significant level.

e) Less than Significant Impact. The project would not conflict with local policies or ordinances protecting biological resources. During construction operations, trees and other plant varieties will need to be removed to accommodate current building designs and construction. The removal of trees and plants during construction activities will not interfere with Redlands' Tree Protection Guidelines as outlined in the City's Municipal Code.⁸ The Guidelines are applicable to "Native or Specimen trees, Landmark trees, and Public Trees" as defined by the City. Trees on the project site have not been designated as native or specimen by the City, are not of any historic significance that would warrant a landmark designation, and trees on the project site are not located on public land, and do not qualify as public trees. Impacts will be less than significant.

f) No Impact. The City of Redlands is an active participant in the Upper Santa Ana River Wash Habitat Conservation Plan (the Wash Plan).⁹ The project site is located south of the plan, outside of its boundaries. The project site is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other local, regional, or state habitat conservation plan. No impacts would occur.

Mitigation Measures

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 *Buteo*, the 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 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).

4.4 – Cultural Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to '15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

A *Historical/Archaeological Resource Survey Report* was conducted to assess possible cultural and historical impacts associated with the construction and operation of the project (see Appendix B). The survey was prepared by CRM Tech on February 15th, 2023, and is attached as Appendix B.

a) No Impact. CEQA Guidelines state the term “historical resources” applies to resources that meet any of the criteria for listing on the California Register of Historical Resources.

- (1) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
- (2) Is associated with the lives of persons important in our past.
- (3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- (4) Has yielded, or may be likely to yield, information important in prehistory or history. (PRC §5024.1(c)).

According to the records search and site visits conducted through the survey, the project site does not include any structure that could be considered historic in nature. In addition, according to the Historical Survey, neither the Former La-Z-Boy Plant nor the unoccupied single-family residence at 360 Kansas Street meet any of the criteria for listing in the California Register of Historical Resources or for local designation, and neither structure qualifies as a “historical resource.” Therefore, the project would not result in any adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5 and no impacts would occur.

b) Less than Significant with Mitigation Incorporated. Given that the project site has been substantially disturbed by development over time, any archaeological resources that may exist likely have been previously unearthed, disturbed, or left in place. As such, significant surficial and subsurface archaeological resources are unlikely to occur on the Project site or be encountered during earthwork activities. However, in the unlikely event that archeological materials are uncovered during ground-disturbing activities, and at the request of the Yuhaaviatam of San Manuel Nation (formerly known as the San Manuel Band of Mission Indians), **Mitigation Measures CUL-1 and CUL-2** have been

incorporated to reduce potentially significant impacts. With implementation of Mitigation Measures **CUL-1 and CUL-2**, impacts will be less than significant as a result of construction of the proposed Project.

c) Less than Significant with Mitigation Incorporated. No known human remains are anticipated to be located on or beneath the project site. However, these findings do not preclude the existence of previously unknown human remains located below the ground surface, which may be encountered during construction excavations associated with the project, and it is possible to encounter buried human remains during construction. At the request of the Yuhaaviatam of San Manuel Nation (formerly known as the San Manuel Band of Mission Indians), **Mitigation Measure CUL-3** has been incorporated to reduce potentially significant impacts to previously unknown human remains that may be unexpectedly discovered during project implementation. In the unlikely event that human remains are uncovered the contractor is required to halt work in the immediate area of the find and to notify the County Coroner, in accordance with Health and Safety Code § 7050.5, who must then determine whether the remains are of forensic interest. If the Coroner, with the aid of a supervising archaeologist, determines that the remains are or appear to be of a Native American, they must contact the Yuhaaviatam of San Manuel Nation Cultural Resources Department for further investigations and proper recovery of such remains, if necessary. With implementation of **Mitigation Measure CUL-3**, impacts will be less than significant as a result of construction of the proposed Project.

Mitigation Measures

- 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 regards to significance and treatment.
- 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.
- 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.

4.5 – Energy

Would the project:

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

An *Air Quality, Health Risk, Greenhouse Gas, and Energy Impact Report* was prepared for the proposed project by LSA, dated January 2023 (See Appendix A) to evaluate the potential air quality, energy and greenhouse gas impacts associated with the construction and operation of the proposed project. This report is consistent with the guidance and recommendations contained in the South Coast Air Quality Management District’s (SCAQMD) California Environmental Quality Act (CEQA) Air Quality Handbook. The information presented below is condensed from the report prepared by LSA in December 2022 and is attached as Appendix A.

a) Less than Significant Impact. Implementation of the proposed project would result in the consumption of electricity, natural gas, and petroleum fuels during construction and operation of the business park / warehousing land uses.

Construction Energy Use

Construction of the proposed project is assumed to begin in June 2023 and end in May 2024. The project would require energy for activities such as the manufacture and transportation of building materials, grading activities, and building construction. Construction of the proposed project would require electricity to power construction-related equipment. Construction of the proposed project would not involve the consumption of natural gas. The construction-related equipment would not be powered by natural gas, and no natural gas demand is anticipated during construction. Transportation energy represents the largest energy use during construction and would occur from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction worker vehicles that would use petroleum fuels (e.g., diesel fuel and/or gasoline). Therefore, the analysis of energy use during construction focuses on fuel consumption. Construction trucks and vendor trucks hauling materials to and from the project site would be anticipated to use diesel fuel, whereas construction workers traveling to and from the project site would be anticipated to use gasoline-powered vehicles. Fuel consumption from transportation uses depends on the type and number of trips, vehicle miles travelled (VMT), the fuel efficiency of the vehicles, and the travel mode. Estimates of fuel consumption (diesel fuel and gasoline) from construction equipment, construction trucks, and construction worker vehicles were based on default construction equipment assumptions and trip estimates from CalEEMod and fuel efficiencies from EMFAC2021. Fuel consumption estimates are presented in Table 9, below.

**Table 9
Proposed Project Energy Consumption Estimates During Construction**

Energy Type	Total Fuel Consumption	Percentage of Increase Countywide
Diesel Fuel (total gallons)	68,917.10	0.02
Gasoline (total gallons)	30,348.00	<0.01
Source: LSA, 2023.		

As indicated in Table 9, the project would consume approximately 68,917.1 gallons of diesel fuel and approximately 30,348.0 gallons of gasoline during construction. Based on fuel consumption obtained from CARB’s California Emissions Factor Model, Version 2021 (EMFAC2021), approximately 321.6 million gallons of diesel and approximately 915.5 million gallons of gasoline are estimated to have been consumed from vehicle trips in San Bernardino County in 2022. Therefore, construction of the proposed project would increase the annual construction generated fuel use in San Bernardino County by approximately 0.02 percent for diesel fuel usage and by less than 0.01 percent for gasoline fuel usage. As such, project construction would have a negligible effect on local and regional energy supplies. Furthermore, impacts related to energy use during construction would be temporary and relatively small in comparison to San Bernardino County’s overall use of the State’s available energy resources. No unusual project characteristics would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in the region or the State. In addition, construction activities are not anticipated to result in an inefficient use of energy as gasoline and diesel fuel would be supplied by construction contractors who would conserve the use of their supplies to minimize their costs on the project. The project would not cause or result in the need for additional energy facilities or an additional or expanded delivery system. For these reasons, fuel consumption during construction would not be inefficient, wasteful, or unnecessary, and impacts would be less than significant.

Operational Energy Use

Operational energy use is typically associated with natural gas use, electricity consumption, and fuel used for vehicle trips associated with a project. Energy consumption was estimated for the proposed project using default energy intensities by land use type in CalEEMod. The proposed project would also result in energy usage associated with gasoline and diesel fuel consumed by project-related vehicle and truck trips. Fuel use associated with vehicle and truck trips generated by the proposed project was calculated based on the project’s Traffic Impact Analysis 59, which identifies that the existing conditions typically generate approximately 928 average daily trips and that the proposed project would generate approximately 962 average daily trips, including 681 passenger vehicle trips, 55 two-axle truck trips, 54 three-axle truck trips, and 172 four-axle truck trips. The amount of operational fuel use was estimated using CARB’s EMFAC2021 model, which provided projections for typical daily fuel usage in San Bernardino County. Electricity, natural gas, and fuel usage estimates associated with the proposed project are shown in Table 10, below.

As shown in Table 10, the estimated potential net increase in electricity demand associated with the operation of the proposed project is 612,787 kWh per year. Total electricity consumption in San Bernardino County in 2020 was 15,968.5 GWh (15,968,515,536 kWh). Therefore, operation of the proposed project would increase the annual electricity consumption in San Bernardino County by less than 0.01 percent. As also shown in Table 10, the estimated potential net increase in natural gas demand associated with operation of the proposed project is 8,559.3 therms per year. Natural gas consumption in San Bernardino County in 2020 was 527 million therms (527,236,428 therms). Therefore, operation of the proposed project would negligibly increase the annual natural gas consumption in San Bernardino County by less than 0.01 percent.

Table 10
Energy Consumption Estimates During Project Operation

Energy Type	Annual Energy Consumption
<i>Existing Use Operational Energy Consumption</i>	
Electricity Consumption (kWh/year)	623,199.0
Natural Gas Consumption (therms/year)	5,225.9
<i>Proposed Project Operational Energy Consumption</i>	
Electricity Consumption (kWh/year)	1,235,986.0
Natural Gas Consumption (therms/year)	13,785.2
Net Electricity Consumption	612,787.0
Net Natural Gas Consumption	8,559.3
<i>Existing Uses Automotive Fuel Consumption</i>	
Gasoline (gallons/year)	270,581.1
Diesel Fuel (gallons/year)	150,360.6
<i>Proposed Project Automotive Fuel Consumption</i>	
Gasoline (gallons/year)	207,395.2
Diesel Fuel (gallons/year)	272,935.6
Net Gasoline Consumptions	-63,185.9
Net Diesel Fuel Consumption	122,563.0
Source: LSA, 2023.	

Electrical and natural gas demand associated with project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. Furthermore, the proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. The project would be required to adhere to all federal, State, and local requirements for energy efficiency, including the Title 24 standards. Title 24 building energy efficiency standards establish minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting, which would reduce energy usage.

As shown in Table 10, fuel consumption associated with the vehicle trips generated by the proposed project would result in a net decrease of approximately 63,185.9 gallons of gasoline and a net increase of approximately 122,563.0 gallons of diesel from existing conditions. This analysis conservatively assumes that all vehicle trips generated as a result of project operation would be new to San Bernardino County. Based on fuel consumption obtained from EMFAC2021, approximately 321.6 million gallons of diesel and approximately 915.5 million gallons of gasoline will be consumed from vehicle trips in San Bernardino County in 2022. Therefore, vehicle and truck trips associated with the proposed project would increase the annual fuel use in San Bernardino County by approximately less than 0.01 percent for gasoline fuel usage and approximately 0.04 percent for diesel fuel usage. Fuel consumption associated with vehicle trips generated by project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region, and as such, impacts would be less than significant.

b) Less than Significant Impact. In 2002, the Legislature passed SB 1389, which required the CEC to develop an integrated energy plan every two years for electricity, natural gas, and transportation fuels

for the Integrated Energy Policy Report. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for ZEVs and their infrastructure needs, and encouragement of urban designs that reduce VMT and accommodate pedestrian and bicycle access.

The CEC's 2021 Integrated Energy Policy Report and 2022 Integrated Energy Policy Report Update provide the results of the CEC's assessments of a variety of energy issues facing California. As indicated above, energy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the overall use in the County. In addition, energy usage associated with operation of the proposed project would be relatively small in comparison to the overall use in San Bernardino County, and the State's available energy resources. Therefore, energy impacts at the regional level would be negligible. Because California's energy conservation planning actions are conducted at a regional level, and because the proposed project's total impact on regional energy supplies would be minor, the proposed project would not conflict with or obstruct California's energy conservation plans as described in the CEC's Integrated Energy Policy Report. Additionally, as demonstrated above, the proposed project would not result in the inefficient, wasteful, and unnecessary consumption of energy. Potential impacts related to conflict with or obstruction of a State or local plan for renewable energy or energy efficiency would be less than significant.

4.6 – Geology and Soils

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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 waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a.i) Less than Significant Impact. The City of Redlands is located in a known fault zone according to the Alquist-Priolo Earthquake Fault Zoning Map. Redlands is between the San Andreas fault zone to the northeast, and the San Jacinto fault zone (also referred to as the Loma Linda Fault) to the southwest. The project site is not located within a designated Alquist-Priolo designated fault zone.¹⁰ The Crafton Hills fault zone, also referred to as the Redlands Fault, traverses through the southeastern portion of the city. The project site is located approximately 2 miles northwest of the Crafton Hills fault zone. Redlands is located in a seismically active region with a high potential for seismic hazards and damage to occur. According to the City General Plan, development should be restricted within and near Alquist-Priolo designated fault zones.¹¹ Furthermore, structures should incorporate design standards recommended by the most current California Building Code (CBC). The project is not located on or near a Alquist-Priolo fault zone, and would adhere to design and repair requirements adopted in the current City of Redlands Code of Ordinances from the 2019 CBC.¹² Design requirements adopted by the city would be sufficient in mitigating seismic hazards to the proposed project, and as such, impacts are determined to be less than significant.

a.ii) Less than Significant Impact. The project site is subject to ground shaking given its proximity to fault zones and Southern California location. Per the City’s General Plan, the potential for ground shaking and seismic-related damages are also dependent on the underlying soil composition.¹³ The City is built on alluvium materials that can intensify ground shaking. The project site is of no greater risk to ground shaking than another area of Redlands, and while a structure may be damaged during an earthquake, adherence to design requirements adopted from the CBC would minimize damage to property within the structure, as they are designed to not collapse. The CBC is intended to provide minimum requirements to prevent major structural failure and loss of life. Impacts due to ground shaking would be less than significant.

a.iii) Less than Significant Impact. Liquefaction is a form of ground failure that occurs when soil transforms from a solid state to liquefied condition due to intense seismic ground shaking. Liquefaction typically occurs in loose granular materials, such as alluvium-type soils. Saturated soils or areas located near waterways and areas with a high groundwater level are also susceptible to such ground failure. Parts of the City of Redlands are susceptible to liquefaction and ground failure from seismically induced ground shaking. However, the City’s General Plan indicates that the project site is not located in an area considered susceptible to liquefaction.¹⁴ Impacts related to seismic-related ground failure and liquefaction will be less than significant.

a.iv) No Impact. The City’s General Plan outlines areas in Redlands susceptible to landslides. According to the Healthy Community Element of the Redlands General Plan, the project site is not located in an area with high susceptibility, or even low to medium susceptibility, to landslide or ground subsidence.¹⁵ There are no anticipated impacts related to landslides.

b) Less than Significant Impact. Topsoil is used to cover surface areas for the establishment and maintenance of vegetation due to its high concentrations of organic matter and microorganisms. The project site is located in an already developed area of Redlands, although there is the potential to expose surface soils to wind and water erosion during demolition and construction activities. However, wind erosion would be minimized through soil stabilization measures required by SCAQMD Rule 403 (Fugitive Dust), such as daily watering.¹⁶ Stormwater related erosion would further be prevented through control practices outlined in the Redlands NPDES program.¹⁷ Following project construction, the site itself would consist of mostly impervious surfaces and landscaping. Impacts related to soil erosion would be less than significant with the implementation of existing regulations.

c) Less than Significant Impact. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The downslope movement is due to a combination of gravity and ground shaking. Lateral spreading has been observed to generally take place toward a free face (i.e., retaining wall, slope, or channel) and to lesser extent on ground surfaces with a very gentle slope. As previously discussed, the project site is in an area with a low susceptibility to liquefaction, and thus a low potential for lateral spreading to occur on the project site. The project site is located in a flat developed area, and any soil instability on the project site would not cause landslides. The project is required to be constructed in accordance with the CBC, and keeping in compliance with existing CBC regulations would limit hazard impacts arising from unstable soils to less than significant levels.

d) Less than Significant Impact. Construction of the proposed project is required to comply with the California Building Code (CBC); requiring building permits constructed to comply with current building code standards. These standards include consideration of geological and seismic conditions. Soil conditions at the site would be identified and considered as part of the design process. Compliance with existing CBC regulations would limit hazard impacts arising from liquefaction, landslides, lateral spreading, and unstable soils to less than significant.

e) No Impact. The project proposes to install new onsite water and sewer lines that would connect to the existing municipal sewer infrastructure in the surrounding streets. The underground chambers will be in the northwesterly landscape area and fully infiltrate the water volume. The proposed project would connect to this system and would not require the use of septic tanks. No impact will occur.

f) Less than Significant with Mitigation Incorporated. The proposed project site is currently developed in an urbanized area and therefore has no unique paleontological or geological resources on or near it. Development of the proposed warehouse will require demolition of the existing buildings, as well as site preparation, grading, and construction operations. Given that the proposed project site has been previously disturbed, it is considered unlikely that paleontological resources (fossil evidence of life from past geologic time frames) will be found. However, in the event that paleontological materials are uncovered, **Mitigation Measure GEO-1** is incorporated to ensure that uncovered resources are evaluated and curated as recommended by a qualified paleontologist. Impacts to paleontological resources would be less than significant with mitigation incorporation.

Mitigation Measures

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

4 – Evaluation of Environmental Impacts

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.

4.7 – Greenhouse Gas Emissions

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

An *Air Quality, Health Risk, Greenhouse Gas, and Energy Impact Report* was prepared to evaluate the potential air quality, energy and greenhouse gas impacts associated with the construction and operation of the proposed project (see Appendix A). This report is consistent with the guidance and recommendations contained in the South Coast Air Quality Management District’s (SCAQMD) California Environmental Quality Act (CEQA) Air Quality Handbook. The information presented below is condensed from the report prepared by LSA in December 2022 and is attached as Appendix A.

a) Less than Significant Impact. Gases that trap heat in the atmosphere and affect regulation of the earth’s temperature are known as GHG. Many chemical compounds found in the earth’s atmosphere exhibit the GHG property. GHG’s allow sunlight to enter the atmosphere freely. When sunlight strikes the earth’s surface, it is either absorbed or reflected back toward space. Earth that has absorbed sunlight warms up and emits infrared radiation toward space. GHG absorbs this infrared radiation and “trap” the energy in the earth’s atmosphere.

GHG that contribute to climate change are a different type of pollutant than criteria or hazardous air pollutants because climate change is global in scale, both in terms of causes and effects. Some GHG are emitted to the atmosphere naturally by biological and geological processes such as evaporation (water vapor), aerobic respiration (carbon dioxide), and off-gassing from low oxygen environments such as swamps or exposed permafrost (methane); however, GHG emissions from human activities such as fuel combustion (e.g., carbon dioxide) and refrigerants use (e.g., hydrofluorocarbons) significantly contribute to overall GHG concentrations in the atmosphere, climate regulation, and global climate change. The Earth’s average near-surface atmospheric temperature rose $0.6 \pm 0.2^{\circ}$ Celsius ($^{\circ}$ C) or $1.1 \pm 0.4^{\circ}$ Fahrenheit ($^{\circ}$ F) in the 20th century. The prevailing scientific opinion on climate change is that most of the warming observed over the last 50 years is attributable to human activities. The increased amounts of carbon dioxide (CO₂) and other GHGs are the primary causes of the human-induced component of warming. GHGs are released by the burning of fossil fuels, land clearing, agriculture, and other activities, and lead to an increase in the greenhouse.

The 1997 United Nations’ Kyoto Protocol international treaty set targets for reductions in emissions of four specific GHG – carbon dioxide, methane, nitrous oxide, and sulfur hexafluoride – and two groups of gases – hydrofluorocarbons and perfluorocarbons. These GHG are the primary GHG emitted into the atmosphere by human activities. Water vapor is also a common GHG that regulates the earth’s

temperature; however, the amount of water vapor in the atmosphere can change substantially from day to day, whereas other GHG emissions remain in the atmosphere for longer periods of time. Black carbon consists of particles emitted during combustion; although a particle and not a gas, black carbon also acts to trap heat in the Earth's atmosphere. The six common GHG are described below.

- **Carbon Dioxide (CO₂).** CO₂ is released to the atmosphere when fossil fuels (oil, gasoline, diesel, natural gas, and coal), solid waste, and wood or wood products are burned.
- **Methane (CH₄).** CH₄ is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in municipal solid waste landfills and the raising of livestock.
- **Nitrous Oxide (N₂O).** N₂O is emitted during agricultural and industrial activities, as well as during combustion of solid waste and fossil fuels.
- **Sulfur Hexafluoride (SF₆).** SF₆ is commonly used as an electrical insulator in high voltage electrical transmission and distribution equipment such as circuit breakers, substations, and transmission switchgear. Releases of SF₆ occur during maintenance and servicing as well as from leaks of electrical equipment.
- **Hydrofluorocarbons (HFCs) and Perfluorocarbons (PFCs).** HFCs and PFCs are generated in a variety of industrial processes. Although the amount of these gases emitted into the atmosphere is small in terms of their absolute mass, they are potent agents of climate change due to their high global warming potential.

GHG can remain in the atmosphere long after they are emitted. The potential for a particular greenhouse gas to absorb and trap heat in the atmosphere is considered its global warming potential (GWP). The reference gas for measuring GWP is CO₂, which has a GWP of one. By comparison, CH₄ has a GWP of 28, which means that one molecule of CH₄ has 28 times the effect on global warming as one molecule of CO₂. Multiplying the estimated emissions for non-CO₂ GHG by their GWP determines their CO₂ equivalent (CO₂e), which enables a project's combined GWP to be expressed in terms of mass CO₂ emissions.

Project GHG Emissions

The City of Redlands total emissions were 419,417 MTCO₂e per year in 2015. The emissions inventory covers direct and indirect GHG emissions from sources within the boundaries of Redlands. The emissions inventory tallies emissions from ten sectors. The largest sector is transportation at approximately 41 percent, followed by residential and commercial sectors at approximately 23 and 17 percent, respectively. Off-road equipment is 8 percent of the total emissions. Industrial and solid wastes are 5 percent and 4 percent of the total emissions, respectively. Public lighting, water transport, distribution and treatment, and wastewater are all less than 1 percent of the total emissions.

Short-term Emissions

Construction activities associated with the proposed project would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO₂, CH₄, and N₂O. Furthermore, CH₄ is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

As indicated above, the SCAQMD does not have an adopted threshold of significance for construction-related GHG emissions. However, lead agencies are required to quantify and disclose GHG emissions that would occur during construction. The SCAQMD then requires the construction GHG emissions to

be amortized over the life of the project, defined by the SCAQMD as 30 yearsⁱ, added to the operational emissions, and compared to the applicable interim GHG significance threshold tier.

Using CalEEMod, it is estimated that the project would generate approximately 690.1 MTCO₂e during construction of the project. When annualized over the 30-year life of the project, annual emissions would be 23.0 MTCO₂e. Table 11 lists the construction GHG emissions (details are provided in the CalEEMod output in Appendix A). Construction emissions would be temporary in nature and would only occur for the duration of the construction period.

**Table 11
Construction Greenhouse Gas Emissions**

Construction Year	Annual Emissions (MT/yr.)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
2023	428.0	0.1	<0.1	436.7
2024	249.9	<0.1	<0.1	253.4
Total Construction GHG Emissions				690.1
Amortized Annual Construction GHG Emissions				23.0
Source: Compiled by LSA (January 2023). MT/yr. = metric tons per year N ₂ O = nitrous oxide CH ₄ = methane CO ₂ = carbon dioxide CO ₂ e = carbon dioxide equivalent				

Long-term Emissions

Long-term GHG emissions are typically generated from mobile sources (e.g., vehicle trips), area sources (e.g., maintenance activities and landscaping), indirect emissions from sources associated with energy consumption, waste sources (land filling and waste disposal), and water sources (water supply and conveyance, treatment, and distribution). Mobile-source GHG emissions would include project-generated vehicle and truck trips to and from the project. Area-source emissions would be associated with activities such as landscaping and maintenance on the project site. Energy source emissions would be generated at off-site utility providers because of increased electricity demand generated by the project. Waste source emissions generated by the proposed project include energy generated by land filling and other methods of disposal related to transporting and managing project-generated waste. In addition, water source emissions associated with the proposed project are generated by water supply and conveyance, water treatment, water distribution, and wastewater treatment. Following guidance from the SCAQMD, GHG emissions were estimated for the operational year of 2024 using CalEEMod. Table 12 shows the calculated GHG emissions for the proposed project.

ⁱ The SCAQMD has identified the average operational lifespan of buildings to be 30 years. Website: [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgattachmente.pdf](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf) [accessed November 2022].

**Table 12
Greenhouse Gas Emissions**

Emissions Source	Operational Emissions (MT/yr.)				
	CO ₂	CH ₄	N ₂ O	CO ₂ e	% of Total
Existing Uses					
Area Sources	<0.1	<0.1	<0.1	0.3	<1
Energy Sources	138.4	<0.1	<0.1	139.1	5
Mobile Sources	2,255.6	<0.1	<0.1	2,327.2	86
Waste Sources	37.2	2.2	0.0	92.1	3
Water Sources	117.8	1.5	<0.1	165.1	6
Total Existing Uses Emissions				2,723.8	100
Proposed Project Emissions					
Area Sources	<0.1	<0.1	0.0	<0.1	<1
Energy Sources	292.7	<0.1	<0.1	294.3	6
Mobile Sources – Vehicles/Light Duty Trucks	1,199.1	<0.1	<0.1	1,218.8	24
Mobile Sources – Heavy Duty Trucks	3,099.5	0.1	0.5	3,249.2	65
Waste Sources	37.7	2.2	0.0	93.4	2
Water Sources	124.3	1.5	<0.1	172.5	3
Total Project Operational Emissions				5,028.2	100
Amortized Construction Emissions				23.0	-
Total Annual Emissions				5,051.2	-
Total Net Annual Emissions				2,304.4	-
SCAQMD Threshold				3,000	-
Exceed Threshold?				No	-
Source: Compiled by LSA (January 2023). MT/yr. = metric tons per year N ₂ O = nitrous oxide CH ₄ = methane CO ₂ = carbon dioxide CO ₂ e = carbon dioxide equivalent					

As discussed above, a project would have less than significant GHG emissions if it would result in operational-related GHG emissions of less than 3,000 MT CO₂e/yr. Based on the analysis results, the proposed project would result in an increase of approximately 2,304.4 MT CO₂e/yr. Therefore, operation of the proposed project would not generate significant GHG emissions that would have a significant effect on the environment. As such, impacts would be less than significant.

b) Less than Significant Impact. The proposed project would not conflict with the City of Redlands' Climate Action Plan, the San Bernardino Greenhouse Gas Reduction Plan, the 2022 Scoping Plan, or the 2020-2045 RTP/SCS. The project's consistency with these plans is described in more detail below.

Climate Action Plan

As described above, the City adopted a CAP in December 2017. The consistency of the project with the goals of this CAP fulfills the CEQA goal of fully informing local-agency decision-makers of the environmental impact of the project under consideration at a stage early enough to ensure that GHG emissions are addressed. The proposed project would be consistent with the transportation goals of the CAP by providing additional parking options for electric vehicles and carpool/vanpool vehicles. The proposed project would also be consistent with the CAP goal of increasing energy efficiency in new buildings by complying with the latest California Building Code (Title 24), including the latest CALGreen Code standards. Construction of the project would include a diversion of construction waste from landfills to recycling consistent with current local and State standards and CAP goals to increase

diversion and reduction of waste. As such, the proposed project would be consistent with applicable CAP goals.

San Bernardino County Regional Greenhouse Gas Reduction Plan

As discussed above, the City of Redlands was a participant in the San Bernardino County Regional Greenhouse Gas Reduction Plan, which identifies the County’s vision and goals on reducing GHG emissions in the different cities, local government facilities, and communities. Table 13 below presents the proposed project’s compliance with each reduction measure evaluated for the City of Redlands, as identified in the San Bernardino County Regional Greenhouse Gas Reduction Plan.

**Table 13
Project Consistency with City of Redlands GHG Reduction Measures**

Measure	Description	Project Consistency
<i>Building Energy</i>		
Policies	<ul style="list-style-type: none"> • 8-A.10: Integrate trees and shade into the built environment to mitigate issues such as stormwater runoff and the urban heat island effect. • 8-P.1: Promote energy efficiency and conservation technologies and practices that reduce the use and dependency on nonrenewable resources of energy by both City government and the community. • 8-P.2: Promote energy awareness community-wide by educating the community regarding energy audits and incentive programs (tax credits, rebates, exchanges, etc.) available for energy conservation. • 8-P.3: Proactively review and update City plans, resolutions, and ordinances to promote greater energy efficiency in both existing and new construction in regard to site planning, architecture, and landscape design. • 8-A.14: Seek funding programs to assist low and moderate-income households in energy conservation. • 8-A.12: Explore participating in new high-efficiency technology programs such as LED lighting for City facilities, safety lighting in parks and other public spaces, and LED street lighting conversion for all City-owned streetlights. • 8-P.10: Demonstrate leadership by reducing the use of energy and fossil fuel consumption in municipal operations, including transportation, waste reduction, and recycling, and by promoting efficient building design and use. • 8-P.9: Undertake initiatives to enhance sustainability by reducing the community’s GHG emissions. • 8-A.20: Support energy resiliency through a diversified system of energy sources including zero and near-zero emission technologies. 	<p>Not Applicable. This measure is not applicable as the City would be responsible for implementing this measure. However, the proposed project would comply with the CALGreen Code, regarding building energy efficiency and other green building standards. In addition, the proposed project would include approximately 81,630 sq ft of ornamental landscaping that would cover 17 percent of the site.</p>

	<ul style="list-style-type: none"> • 8-A.21: Support the development of distributed energy resources (DER), such as combined heat and power (CHP) from microturbines, fuel cells, etc., to assist in local energy security. 	
On-Road		
Policies	<ul style="list-style-type: none"> • 8-P.10: Demonstrate leadership by reducing the use of energy and fossil fuel consumption in municipal operations, including transportation, waste reduction, and recycling, and by promoting efficient building design and use. • 8-A.7: Seek alternatives to reduce non-renewable energy consumption attributable to transportation within the Planning Area. Seek funding and other assistance from the South Coast Air Quality Management District (AQMD) for installation of electric vehicle charging stations at appropriate locations throughout the City. • 4-P.44: Provide choices for travel options, including walking, biking, vehicular, and transit. • 4-P.52: Encourage stops of larger trains (Metrolink) in stations that can adequately accommodate their size and have greater availability of and access to parking. • 4-P.41: Foster a connected, accessible, and active community by creating attractively designed pedestrian- and transit-oriented villages with a mix of uses in a compact area. • 4-A.105: Create an active and compact transit-oriented core with a mix of residential and commercial/office uses. Allow for the reuse of commercial sites as office centers. San Bernardino Council of Governments Reduction Profiles—Redlands San Bernardino County Regional Greenhouse Gas Reduction Plan 3-156 March 2021 ICF □ 4-A.101: Implement bicycle route improvements that provide intra-City and regional connections, connecting to Loma Linda, the City of San Bernardino, and north to the Santa Ana River Trail. • 4-A.100: Provide streetscape improvements along the major corridors of California Street and Redlands Boulevard to enhance comfort and safety for all modes of travel. • 4-A.116: Implement bicycle route improvements that provide strong east-west connections to other Transit Villages as well as north-south connections to improve access to existing neighborhoods to the north. Routes would include the Orange Blossom Trail, the Lugonia Trail on New York Street, and a route along Texas Street. 	<p>Not Applicable. The proposed project would include a speculative warehouse building. Future tenants of the building would implement mass transit encouragement measures as applicable.</p>

	8-P.9: Undertake initiatives to enhance sustainability by reducing the community's GHG emissions.	
Off-Road		
Policies	8-P.9: Undertake initiatives to enhance sustainability by reducing the community's GHG emissions.	Consistent. The proposed project would comply with the CALGreen Code, regarding water conservation and green building standards. In addition, the proposed project would include electric vehicle spaces.
Solid Waste Management		
Policies	<ul style="list-style-type: none"> 8-P.10: Demonstrate leadership by reducing the use of energy and fossil fuel consumption in municipal operations, including transportation, waste reduction, and recycling, and by promoting efficient building design and use. 8-A.42: Adopt a construction and demolition waste recycling ordinance that requires, except in unusual circumstances, all construction, demolition and renovation projects that meet a certain size or dollar value to divert from landfills 100 percent of all cement concrete and asphalt concrete, and an average of at least 75 percent of all remaining non-hazardous debris 	Consistent. The proposed project would be consistent with County Solid Waste and State requirements for waste reduction.
Wastewater Treatment		
Policies	<ul style="list-style-type: none"> 8-A.29: Reduce consumption of carbon-based fuels for conveyance and treatment of water and wastewater. 8-A.27: Seek funding sources to implement renewable energy sources determined to be feasible for water and wastewater operations. 	Consistent. The proposed project would comply with the CALGreen Code, regarding water conservation and green building standards.
Water Conveyance		
Policies	<ul style="list-style-type: none"> 8-P.4: Promote residential and commercial water conservation using multiple strategies. 8-P.5: Conserve the highest quality of water reasonably available for domestic use. 8-P.6: Minimize dependence on imported water through efficient use of local surface sources, using wise groundwater management practices, conservation measures, and the use of reclaimed wastewater and non-potable water for irrigation of landscaping and agriculture, where feasible. 8-P.8: Promote sustainability by reducing the community's greenhouse gas (GHG) emissions and fostering green development patterns – including buildings, sites, and landscapes. 	Not Applicable. This measure is not applicable as the City would be responsible for implementing this measure. However, the proposed project would comply with the CALGreen Code, regarding water conservation and green building standards.
<p>Source: Compiled by LSA (November 2022). CALGreen Code = California Green Building Standards Code GHG = greenhouse gas sq ft = square feet</p>		

2022 Scoping Plan

The following discussion evaluates the proposed project according to the goals of the 2022 Scoping Plan, EO B-30-15, SB 32, and AB 197. EO B-30-15 added the immediate target of reducing GHG emissions to 40 percent below 1990 levels by 2030. CARB released a second update to the Scoping Plan, the 2017 Scoping Plan, to reflect the 2030 target set by EO B-30-15 and codified by SB 32. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in EO B-30-15. SB 32 builds on AB 32 and keeps the State on the path toward achieving its 2050 objective of reducing emissions to 80 percent below 1990 levels. The companion bill to SB 32, AB 197, provides additional direction to the CARB related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 intended to provide easier public access to air emissions data that are collected by CARB was posted in December 2016.

In addition, the 2022 Scoping Plan assesses progress toward the statutory 2030 target, while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

The 2022 Scoping Plan focuses on building clean energy production and distribution infrastructure for a carbon-neutral future, including transitioning existing energy production and transmission infrastructure to produce zero-carbon electricity and hydrogen, and utilizing biogas resulting from wildfire management or landfill and dairy operations, among other substitutes. The 2022 Scoping Plan states that in almost all sectors, electrification will play an important role. The 2022 Scoping Plan evaluates clean energy and technology options and the transition away from fossil fuels, including adding four times the solar and wind capacity by 2045 and about 1,700 times the amount of current hydrogen supply. As discussed in the 2022 Scoping Plan, EO N-79-20 requires that all new passenger vehicles sold in California will be zero-emission by 2035, and all other fleets will have transitioned to zero-emission as fully possible by 2045, which will reduce the percentage of fossil fuel combustion vehicles.

Energy efficient measures are intended to maximize energy efficiency building and appliance standards, pursue additional efficiency efforts including new technologies and new policy and implementation mechanisms, and pursue comparable investment in energy efficiency from all retail providers of electricity in California. In addition, these measures are designed to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. The proposed project would be required to comply with the latest Title 24 standards of the CCR, established by the CEC, regarding energy conservation and green building standards.

Water conservation and efficiency measures are intended to continue efficiency programs and use cleaner energy sources to move and treat water. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions. As noted above, the proposed project would be required to comply with the latest Title 24 standards of the CCR, which includes a variety of different measures, including reduction of wastewater and water use. Therefore, the proposed project would not conflict with any of the water conservation and efficiency measures.

The goal of transportation and motor vehicle measures is to develop regional GHG emissions reduction targets for passenger vehicles. The second phase of Pavley standards will reduce GHG emissions from new cars by 34 percent from 2016 levels by 2025, resulting in a 3 percent decrease in average vehicle

emissions for all vehicles by 2020. Vehicles traveling to the project site would comply with the Pavley II (LEV III) Advanced Clean Cars Program. Therefore, the proposed project would not conflict with the identified transportation and motor vehicle measures.

2020-2045 RTP/SCS

SCAG's RTP/SCS identifies that land use strategies that focus on new housing and job growth in areas served by high quality transit and other opportunity areas would be consistent with a land use development pattern that supports and complements the proposed transportation network. The core vision in the 2020–2045 RTP/SCS is to better manage the existing transportation system through design management strategies, integrate land use decisions and technological advancements, create complete streets that are safe to all roadway users, preserve the transportation system, and expand transit and foster development in transit oriented communities. The 2020–2045 RTP/SCS contains transportation projects to help more efficiently distribute population, housing, and employment growth, as well as forecast development that is generally consistent with regional-level general plan data. The forecasted development pattern, when integrated with the financially constrained transportation investments identified in the 2020–2045 RTP/SCS, would reach the regional target of reducing GHG emissions from autos and light-duty trucks by 19 percent by 2035 (compared to 2005 levels). The 2020–2045 RTP/SCS does not require that local general plans, specific plans, or zoning be consistent with the 2020–2045 RTP/SCS, but provides incentives for consistency for governments and developers.

Implementing SCAG's RTP/SCS will greatly reduce the regional GHG emissions from transportation, helping to achieve statewide emissions reduction targets. As stated above, the proposed project would result in a minimal increase in daily trips compared to existing conditions and would in no way conflict with the stated goals of the RTP/SCS; therefore, the proposed project would not interfere with SCAG's ability to achieve the region's GHG reduction target of 19 percent below 2005 per capita emissions levels by 2035. Furthermore, the proposed project is not regionally significant per State CEQA Guidelines Section 15206 and as such, it would not conflict with the SCAG RTP/SCS targets since those targets were established and are applicable on a regional level.

Based on the nature of the proposed project, it is anticipated that implementation of the proposed project would not interfere with SCAG's ability to implement the regional strategies outlined in the RTP/SCS.

4.8 – Hazards and Hazardous Materials

Would the project:

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

A *Phase I Environmental Site Assessment (ESA)*, dated March 31st, 2022, was prepared for the project by Roux Associates, Inc. (see Appendix C). The ESA was performed on both parcels associated with the project; APNs 0292-192-11-0000 at 301 Tennessee Street and 0292-192-14-0000 at 360 Kansas Street. Those parcels will be referred to as Parcel 1 and 2 respectively. The information in this section relates to hazards and hazardous wastes and is based on the information and analysis provided in the Phase I ESA.

a) Less than Significant Impact with Mitigation Incorporated. Implementation of the project could create significant hazards as a result of the routine transport, use, or disposal of hazardous materials during the construction of the proposed project and subsequent operation of the project. The results of the Phase I Environmental Site Assessment found evidence of three Recognized Environmental Conditions (RECs) representing the presence or likely presence of hazardous substance at the property. The identified RECs include: (1) releases at a former fire suppression water trap; (2) leaks from a former 300-gallon gasoline underground storage tank (UST); and (3) a leaking former solvent degreaser.

- (1) **Fire Suppression Trap.** The first REC is a former fire suppression fire trap located on Parcel 1 and involves the release (leak) of volatile organic compounds (VOCs) primarily consisting of trichloroethene (TCE) and tetrachloroethene (PCE) into the soil. A soil investigation conducted in 1994 identified soil impacted by VOCs and total petroleum hydrocarbons (TPH) in the vicinity of a former “fire suppression water overflow collection trap (seepage pit)”. Later soil investigations on Parcel 1 further suggested the origin of contamination was the seepage pit. Impacted soil vapor throughout Parcel 1 is limited to the upper 15 feet, except for the suspected seepage pit, where prior investigations have reported TCE in the soil vapor up to 95 feet below ground surface (bgs). Groundwater samples collected at a permanent monitoring well at the seepage pit (MW-1) have indicated TCE concentrations slightly exceeding drinking standards. Furthermore, indoor air investigations conducted within the former La-Z-Boy building on Parcel 1, identified indoor air impacted by VOCs. The impacts to indoor air are potentially the result of vapor intrusion but are considered more likely to be caused by foam roofing material known to contain (and potentially off-gas) PCE.
- (2) **Underground Storage Tank.** According to records made available by the County of San Bernardino Fire Protection District: Hazardous Materials Division (CSBFD-HMD), the second REC is a 300-gallon gasoline UST formerly located on Parcel 2, approximately 50 feet north of the current residential building. The former UST was removed June 26, 1995, under the supervision of the CSBFD-HMD. A closure letter was issued July 3, 1995, however, in the opinion of the ESA, the closure investigation conducted at the time does not meet current regulatory requirements. Confirmation samples taken at the time did not report VOCs and TPH-gasoline above reporting limits.
- (3) **Former Solvent Degreaser.** Records provided by the South Coast Air Quality Management District (SCAQMD) indicate a former solvent degreaser was installed on site in 1984. No site plans or any records or actions to abandon the degreaser were reviewed by Roux in preparation for the ESA and is considered a data gap. However, given the use of chlorinated solvents used, it is considered an REC as well.

No Controlled Recognized Environmental Conditions (cRECs) or Historical RECs (hRECs) were identified in the Phase I ESA.

Other Environmental Features. The Phase I ESA did acknowledge the existence of Other Environmental Features (OEFs) as “environmental conditions that do not meet the definition of a REC,

but which may warrant mention in a comprehensive Phase I ESA.” OEFs identified in the assessment include former agricultural operations and pesticide usage, a former on-site railroad spur, hazardous chemical storage (degreaser, wax, diesel, and hydraulic fluid), and an unused groundwater well to the east of the residential building on Parcel 2.

A Limited Phase II Site Investigation was prepared by GSI Environmental Inc. for Acc Bld, LLC: Redlands, dated April 1, 2022, and was reviewed by Roux in preparation for this assessment. GSI installed two temporary groundwater monitoring wells at the southern boundary of Parcel 1 for soil vapor monitoring. A total of 46 samples, 23 from each well, were analyzed for VOCs. No VOCs were reported above laboratory reporting limits in the second well (GSI-B2). VOCs detected in the first well (GSI-B1) (chloroform, 1,1-DCE, and TCE) were detected, but were below applicable limits. VOCs were not detected in the grab groundwater samples collected from GSI-B1 and GSI-B2 temporary monitoring wells. TCE, 1,1-DCA and 1,1-DCE were detected above applicable Screening levels in the previously existing MW-1; and GSI concluded that there is a VOC contamination at the northern portion of the project site, near MW-1, and that such VOC concentrations have slightly impacted the groundwater. GSI recommended the implementation of a soil vapor extraction (SVE) to remediate soil at the project site, and recommends groundwater monitoring only, not remediation.

Short-term Activities (Construction): Project construction activities would involve the temporary use and transport of fuels, equipment, earth and building materials, among other potentially hazardous materials. The contractor would be required to develop and adhere to a Health and Safety Plan, which pursuant to California state Health and Safety Code Chapter 6.95, Division 20 (§§ 25500-25532), would minimize potentially hazardous effects of handling potentially hazardous materials during construction.¹⁸ Construction operations would require the removal, clean up, and proper disposal of RECs and OEFs identified at the project site. The project will be in the jurisdiction of, and in compliance with, the Environmental Protection Agency (EPA) and County of San Bernardino, which manage the inspection, regulation, transportation, use, and disposal of hazardous materials in Redlands

Past and ongoing soil and groundwater testing has identified areas of contaminated soil on the project site. Onsite soils must meet state health standards for industrial uses to minimize potential public or worker health conditions during and after grading. Implementation of **Mitigation Measure HAZ-1**, which requires soil testing and removal of contaminated soils (if found), would help assure onsite soils meet applicable health and safety standards during project grading and prior to any new occupancy of the project site.

Construction activities may also involve the placement of remediation equipment or improvements within the proposed project – these improvements are incorporated into **Mitigation Measures HAZ-2 through HAZ-4**. **Mitigation Measure HAZ-2** requires implementation of on-site soil vapor extraction (SVE) system remediation activities, **Mitigation Measure HAZ-3** requires installation of a vapor intrusion mitigation system (VIMS) beneath the proposed warehouse, and **HAZ_4** requires preparation of a soil management plan (SMP). With implementation of these measures, potential impacts to the surrounding area from the disposal or transport of onsite hazardous materials or waste will be reduced to less than significant levels.

Long-term Activities (Operation)

With regard to project operation, the site is zoned as Light Industrial, which allows light manufacturing, warehousing, storage, and office uses. The proposed project is a warehouse, meant for the storage and movement of materials. The specific materials moved through the proposed industrial facility site are unknown prior to its construction, however 10% of storage space is being designated for cold storage usage. In compliance with the San Bernardino County Hazardous Waste Management Plan (HWMP), the City of Redlands requires businesses that use or generate hazardous materials to keep

an inventory of the amounts and types on-site. The transport, use, and/or disposal of hazardous materials is not associated with or expected with this project. The project will generate limited amounts of Household Hazard Waste (HHW), wastes prohibited or discouraged from being disposed of at local landfills. The San Bernardino County Fire Protection District operates a Household Hazardous Waste Program, with 14 permanent HHW collection facilities. These facilities will allow easy disposal of any HHW generated on-site. Through adherence to local regulations, the use of common household hazardous materials, created waste, and their disposal do not present a substantial health risk to the community. Impacts associated with the routine transport, use, or disposal of hazardous materials or wastes would be less than significant.

Remediation and Monitoring

Based on past onsite hazmat contamination conditions, safe operation of the new warehouse will depend on the success of ongoing and planned remediation activities (if needed) during project construction, and monitoring activities (if needed) post construction. **Mitigation Measures HAZ-2 through HAZ-4** address the potential remediation and monitoring activities on the site that may be needed to reduce impacts related to past contamination of the site by hazardous materials.

Based on this analysis, the project will not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. With implementation of the recommended mitigation measures and related regulatory compliance, potential impacts will be reduced to less than significant levels.

b) Less than Significant Impact with Mitigation Incorporated. According to the State Water Resources Control Board there are no open cases of leaking underground storage tanks (LUST) on site (see section 4.8d below). A 300-gallon gasoline UST located on Parcel 2 was removed June 26, 1995, under the supervision of the CSBFD-HMD. A Phase I ESA was conducted on Parcel 2 by Northgate Environmental Management, Inc. (Northgate) on June 10, 2020. Roux reviewed this report, which did not identify any hRECs on the property, and identified one REC related to the former UST previously discussed. The ESA did not suggest any additional recommendations. Per the Phase II Site Investigation prepared by GSI Environmental Inc., it was concluded that there is a VOC contamination at the northern portion of the project site (Parcel 1), and that the VOC concentrations have slightly impacted the groundwater. Recommendations include the implementation of soil vapor extraction (SVE) to remediate soil at the project site, and groundwater monitoring. Although the various hazmat studies indicate the VOC concentrations may not present a significant hazard to the public or environment, potential impacts from the subsurface release of hazardous materials into the environment would be reduced to less than significant levels by implementation of **Mitigation Measures HAZ-1 through HAZ-4** as discussed in Threshold 4.8.a above.

Other environmental features of possible concern identified in the ESA may create a potential hazard to the public or environment. The project site was once used for agricultural purposes from the early 1900s to the mid-1960s; and as such pesticide usage most likely occurred. Furthermore, a rail line from the Southern Pacific Railroad previously ran along what is currently State Street. A railroad spur was identified to be present at the project site from at least 1967 to the late 1980s. A shallow soil investigation conducted in 2019 and tested for organochlorine pesticides (OCPs), heavy metals, TPH, and semi-volatiles organic compounds (SVOCs). According to the investigations, no compounds were detected above applicable screening levels or typical background concentrations. Additionally, hazardous chemicals were stored on site at the former La-Z-Boy facilities. No significant staining was observed during the ESA that could be attributed to hazardous material storage. Stained or shallow contaminated soils should be disposed of if encountered with regard to local requirements.

Based on this analysis, impacts to the public through the accidental release of hazardous materials would be reduced to less than significant levels by implementation of **Mitigation Measures HAZ-1 through HAZ-4** as discussed in Threshold 4.8.a above.

c) Less than Significant Impact with Mitigation Incorporated. The Redlands Adventist Academy (grades K-12) is located at 130 Tennessee Street, approximately 0.1-mile southeast of the project site, while the Arrowhead Christian Academy Upper School (grades 9-12) is located at 105 Tennessee Street approximately 0.1-mile south of the project site. As discussed in Thresholds 9.a and 9.b above, the project has some potential to result in the release of hazardous materials during remediation, grading, or construction related to remediation of the existing contamination. However, implementation of **Mitigation Measures HAZ-1 through HAZ-4** would help ameliorate any significant impacts to local schools during project construction or operation. Therefore, the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. With the recommended mitigation any impacts would be reduced to less than significant levels.

d) No Impact. The proposed project is not located on a site listed on the state *Cortese List*, a compilation of various sites throughout the state that have been compromised due to soil or groundwater contamination from past uses.¹⁹ Based upon review of the *Cortese List*, the project site is not:

- listed as a hazardous waste and substance site by the Department of Toxic Substances Control (DTSC),²⁰
- listed as a leaking underground storage tank (LUST) site by the State Water Resources Control Board (SWRCB),²¹
- listed as a hazardous solid waste disposal site by the SWRCB,²²
- currently subject to a Cease and Desist Order (CDO) or a Cleanup and Abatement Order (CAO) as issued by the SWRCB,²³ or
- developed with a hazardous waste facility subject to corrective action by the DTSC.²⁴

Based on the above review of the Cortese List, the proposed project would not create a significant hazard to the public or the environment. No impact would occur.

e) Less than Significant Impact. The project site is located approximately 4 miles south of the San Bernardino International Airport (SBIA), and 5 miles west of the Redlands Municipal Airport. The project site is outside of the SBIA and Redlands Airport noise contour maps (See Noise Appendix D). The proposed project would adhere to noise and safety policies in Redlands' General Plan.²⁵ The project site is not located within two miles of a local airport and would not create excessive noise to local residents. Impacts would be less than significant.

f) Less than Significant Impact. Construction of the proposed project would not interfere with access for emergency personnel or the evacuation of onsite staff. Access to the project site would be available through four driveways; one on State Street, two on Tennessee Street, and one on Kansas Street. A 30-foot fire lane would connect all four driveways and wraps around the perimeter of the proposed warehouse except for the southern facing side of the building. Construction operations conducted at the project site would not significantly impede the flow of traffic on major evacuation routes in and around the City of Redlands, which include Interstates 10, 15, 210, and 215, and State Highways 30, 60, 66, 71, and 83. The project would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan because no permanent public street or lane closures are proposed. Construction work in the street associated with the project would be limited to a nominal potential traffic diversion. Project impacts would be less than significant.

g) Less than Significant Impact. The project site is not located within or near any State Responsibility Areas or other wildland areas; the nearest such area being in adjacent Loma Linda as part of the San Timoteo Canyon.²⁶ Any potential impacts related to wildland fire would be less than significant.

Mitigation Measures

HAZ-1 Soil Testing. Prior to issuance of a grading permit, representative soil sampling shall be conducted onsite at depths of one 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.

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.

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. SVE remediation activities shall be completed, and a final report submitted to the City prior to issuance of a grading permit for the proposed project. 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 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.

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 a risk greater than 1:1,000,000 then the developer shall implement Mitigation Measure HAZ-3.

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.

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.

The VIMS system shall be designed to allow regular monitoring of vapor concentrations. After occupancy, monitoring shall be conducted and documented quarterly for the first year, semi-annually the second year, and annually thereafter for five years.

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.

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 shall be shared with all contractors involved with earth movement and import activities, if any. The SMP shall identify parties to be contacted if unexpected or unknown conditions are encountered, including an environmental professional and regulatory agencies, if necessary (e.g., if an underground storage tank is encountered).

4.9 – Hydrology and Water Quality

Would the project:

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

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Less than Significant Impact. The project site is zoned as Light Industrial, meant for manufacturing, distribution, research and development (R&D) industries, and ancillary commercial uses. The project site is currently developed with an existing former manufacturing warehouse and unoccupied single-family home. The proposed project includes the demolition of existing onsite structures and the construction of a warehouse and associated parking and landscape improvements. By their nature, these kinds of facilities require a significant amount of parking, truck-staging, and vehicle circulation, in addition to the building facilities themselves. This in turn increases the amount of impermeable surfaces and the amount of flows into storm drains. Landscape coverage around the project site serves to provide relief for this. Construction and operation of the proposed warehouse would be required to comply with federal, state, and local water guidelines and requirements.

According to the City’s General Plan, Redlands belongs to the Upper Santa Ana River Watershed Integrated Regional Water Management Plan (IRWM), a plan with the objective of improving water supply reliability, flood management, stormwater recharge, water quality, and habitats/open space. Development of the proposed warehouse would have to adhere to benchmarks outlined in the San Bernardino Valley Regional Urban Water Management Plan (RUWMP). Additionally, landscaping associated with the development of the proposed project would be in compliance with Chapter 15-54 of the Redlands Municipal Code, Water Efficient Landscape Requirements. Compliance with such requirements include following irrigation schedules, water efficiency audits, and non-potable irrigation systems among other guidelines. Furthermore, the project would be required to adhere to all Santa Ana Regional Water Quality Control Board (SARWQCB) permitting requirements for construction and NPDES standards for stormwater runoff, as well as adhere to City ordinances requiring the use of Best Management Practices (BMPs) to control the release of potential pollutants entering storm drain systems.²⁷ Such BMPs include, but are not limited to, routine street sweeping, routine storm drain and catch basin cleaning, regular pavement repair/maintenance, spill prevention practices, etc. With adherence to SARWQCB permitting requirements and NPDES standards, and adherence to City guidelines, impacts to water quality standards or waste discharge requirements will be less than significant.

b) Less than Significant Impact. Construction of the proposed warehouse and associated parking has the potential to interfere with groundwater recharge and can potentially deplete supplies. The nearest monitoring well to the project site is located approximately 0.4 miles southeast of the project site. The well has a depth of 548 feet, and the most recent readings, taken December 1, 2022, indicate a depth to groundwater of 180.1 feet.²⁸ The low water table recorded indicates the project will have a less than significant impact on groundwater supplies. The proposed project includes the demolition of the current 193,469 square-foot manufacturing building, and the development of a 193,469 square-foot warehouse building, 267 parking spaces, and the paving of driveways for truck and car access. The paving of previously undeveloped land and the increase in building surface area would increase impervious surface coverage on the site, thereby potentially reducing the total amount of infiltration

onsite. However, development of the proposed warehouse will include approximately 84,845 square feet of ornamental landscaping that would cover 18% of the site. Additionally, drainage from the proposed project would surface flow through the site and use catch basins and landscape drains to collect for treatment. The subsurface storm drain would be used to convey flows into a proposed underground chamber infiltration system. The project site is not utilized for groundwater recharge and would include landscaping and drainage improvements that will contribute to infiltration. The development of the project site would have a less than significant impact on the groundwater table level.

c.i) Less than Significant Impact. The City of Redlands is located in and around several regional watersheds. The City's existing water system is reliant on the Mill Creek and Santa Ana Watersheds. No rivers or streams intersect the project site. The project would not result in the alteration of drainages and drainage patterns, as the project would install new onsite water and sewer lines that would connect to the existing infrastructure in the surrounding streets. Drainage facilities on-site would be regularly maintained. Development of the proposed project would include construction activities such as demolition, site preparation, and grading. According to the City, all grading plans within the city require a standalone Erosion Control Plan.²⁹ Adherence to the City's erosion plan guidelines during construction of the proposed warehouse and proper maintenance of drainage facilities would decrease the likelihood of erosion of sensitive stream habitats, and as such any impacts to streams or rivers near the project site will be less than significant.

c.ii) Less than Significant Impact. No rivers or streams traverse the project site; thus, the project would not result in the alteration of any stream course. During construction, the project applicant would be required to comply with drainage and runoff guidelines pursuant to Redlands Municipal Code Chapter 15.54.200.³⁰ Due to the developed condition of the project site, the proposed project would not alter the existing drainage pattern of the site or surrounding area or increase runoff. With regard to project operation, construction of the project would increase the net area of impermeable surfaces on the site; therefore, increased discharges to the City's existing storm drain system may occur. Surface runoff associated with the proposed development would be collected on site through multiple drainage areas and infiltration systems and conveyed to the City's storm drainage system. All drainage plans are subject to City review and approval. The project site is zoned for light industrial uses and as a result could increase pollutants entering drainage systems. Construction of the proposed project will be required to adhere to all SARWQCB permitting requirements and NPDES standards for stormwater runoff, as well as adhere to City ordinances requiring the use of BMPs to control the release of potential pollutants entering storm drain systems as indicated in the City's General Plan. Compliance with local drainage guidelines and implementation of pollutant-related BMPs would make potential impacts less than significant.

c.iii) Less than Significant Impact. Development of the proposed project would increase the net area of impermeable surfaces on the site. Construction of the proposed project would install new onsite water and sewer lines connecting to the existing infrastructure in the surrounding streets. Drainage from the proposed project would surface flow through the site and utilize catch basins and landscape drains to collect for treatment. Subsurface storm drains would convey flows into a proposed underground chamber infiltration system. All drainage plans are subject to City review and approval. The proposed project is zoned for light industrial use and could result in substantial pollutant loading. As discussed in sections 4.9a and 4.9c.ii, BMPs would be required to be incorporated to protect water quality. With proper maintenance of drainage facilities and adherence to BMPs, impacts would be less than significant.

c.iv) Less than Significant Impact. According to flood maps prepared by the Federal Emergency Management Agency (FEMA), the project site is located in an area designated as "Flood Zone AO"; a special flood hazard area subject to inundation by the 1% annual chance flood with average flood depths

between 1 to 3 feet.³¹ This designation is considered for river or stream flood hazard areas; the project site is adjacent to the Mission Channel, an irrigation canal that originally provided water to farms, and now serves to carry stormwater and runoff out of the city. The project site is currently occupied by a former La-Z-Boy manufacturing warehouse and unoccupied single-family home. The demolition of existing structures, grading, and construction of the proposed warehouse, parking, and landscaping would not impede or redirect flood flows, nor will it impact the flow of the Mission Channel. The project site is in a special flood hazard area; however, construction and operation of the project would not impede or redirect flood flows from the current condition because construction of the proposed warehouse would take place entirely within the existing footprint of the site and would not encroach on the flood control channel to the north. In addition, the proposed project would comply with City of Redlands Municipal Code Chapter 15.32 (Flood Damage Protection), which would ensure flood flows would not be impeded. Impacts will be less than significant.

d) Less than Significant Impact. The City is not exposed to tsunami hazards due to its inland location. In addition, according to the California Department of Water Resources, the City of Redlands is not located in a dam inundation area.³² There are no impacts related to tsunami or dam inundation. The project site is located in a special flood hazard area, as indicated previously by FEMA, subject to inundation by the 1% annual chance flood. However, adherence to City ordinances requiring the use of BMPs to control the release of potential pollutants would reduce the potential for the release of pollutants in the event of inundation by a flood. Impacts would be less than significant.

e) Less than Significant Impact. The Santa Ana Regional Water Quality Control Board's (SARWQCB) Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Development of the proposed project will be required to adhere to requirements of the Basin Plan. This includes the incorporation of BMPs to protect water quality during construction and operational periods. Development of the project site would be subject to all existing water quality regulations and programs, including all applicable construction permits. Existing General Plan policies related to groundwater quality are applicable to the project. The Sustainable Community Element includes policies that aim to limit potential water quality impacts and to promote groundwater conservation. Implementation of General Plan policies and the Regional Basin Plan would ensure that water quality impacts related to the proposed project would be less than significant.

4.10 – Land Use and Planning

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) No Impact. The irregularly shaped project site is comprised of 2 parcels with an existing manufacturing warehouse and a single-family house. The project site is surrounded by commercial, industrial, and transportation-related land uses, and will not include the reconfiguration of existing roadways or streets. There are residential uses near the project site, however the project will not divide an established community and, as such, no impacts will occur.

b) No Impact. The project would not conflict with light industrial land uses (manufacturing, distribution, commercial) designated in the Redlands General Plan.³³ The proposed project is located within the Zoning designation of Light Industrial (I-P) which permits warehouses. The site is not located in a specific plan area. The proposed project does not require a general plan amendment or change of zone and will be required to comply with all applicable policies, requirements, and regulations of any agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. No impact will occur.

4.11 – Mineral Resources

Would the project:

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

a) Less Than Significant Impact. The California Surface Mining and Reclamation Act identifies and protects mineral resources within the State of California. It establishes several Mineral Resource Zones, divisions of land containing within them various amounts of known or unknown mineral resources. According to the City’s General Plan, the northeast portion of the project site is adjacent to an MRZ-2 area, the designation suggesting that significant mineral resources may be present.³⁴ The General Plan further indicates that the project site is not located in an area designated by the State Mining and Geology Board as having regionally significant PCC-grade aggregate resources. The project site is located in an urbanized area of Redlands, with developments currently on and surrounding the property that include business, industrial, and residential uses. The demolition and redevelopment of the project site would not constitute a loss of aggregate mineral resources to the City or the State as its urban location is incompatible with mining operations and would negatively impact surrounding businesses and residents. Furthermore, the majority of the project site is located in an area with undetermined mineral resource occurrences. The proposed project is in a developed area of the City, incompatible with mining extraction operations, and would have a less than significant impact on mineral resources available to the City.

b) Less than Significant Impact. Mineral resources found in Redlands have been deemed significant to the region and the State, however such mineral resources identified have not been designated as locally significant to the City of Redlands. The northeast portion of the project site is adjacent to an MRZ-2 area, of which significant mineral deposits are likely to be present. However, the area is zoned as Light Industrial (I-P), meant for light industrial uses related to warehousing, wholesaling, and manufacturing uses. The area is urbanized and is surrounded by areas that would not support the development of mining operations and the subsequent increase in mining related pollution. The development of the project does not constitute a loss of mineral resources as the surrounding land uses do not support the development of mining operations. Potential impacts to locally important mineral resources would be less than significant.

4.12 – Noise

Would the project:

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

A *Noise and Vibration Impact Analysis* was prepared by LSA (January, 2023) to evaluate and document noise levels associated with construction and operation of the proposed warehouse (See Appendix D). The information in this section is taken from the *Noise and Vibration Impact Analysis* for the proposed project. Additional detail regarding how noise is defined and measured can be found in the report in Appendix D.

a) Less than Significant Impact. Physical damage to human hearing begins at prolonged exposure to sound levels higher than 85 dBA. Exposure to high sound levels affects the entire system, with prolonged sound exposure in excess of 75 dBA increasing body tensions, thereby affecting blood pressure and functions of the heart and the nervous system. In comparison, extended periods of sound exposure above 90 dBA would result in permanent cell damage. When the sound level reaches 120 dBA, a tickling sensation occurs in the human ear, even with short-term exposure. This level of sound is called the threshold of feeling. As the sound reaches 140 dBA, the tickling sensation is replaced by a feeling of pain in the ear (i.e., the threshold of pain). A sound level of 160–165 dBA will result in dizziness or a loss of equilibrium. The ambient or background noise problem is widespread and generally more concentrated in urban areas than in outlying, less developed areas.

Construction Noise Impact Analysis

Two types of short-term noise impacts could occur during the construction of the proposed project. First, construction crew commutes and the transport of construction equipment and materials to the site for

the proposed project would incrementally increase noise levels on access roads leading to the site. Although there would be a relatively high single-event noise-exposure potential causing intermittent noise nuisance (passing trucks at 50 ft would generate up to 84 dBA L_{max}), the effect on longer-term ambient noise levels would be small when compared to existing daily traffic volumes on Kansas Street, West State Street, and Tennessee Street. Because construction-related vehicle trips would not approach existing daily traffic volumes, as less trips would be made over a shorter-period of time, traffic noise would not increase by 3 dBA CNEL. A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, short-term, construction-related impacts associated with worker commute and equipment transport to the project site would be less than significant. The second type of short-term noise impact is noise generated during construction at the project site which includes demolition of the existing structures and other site improvements, site preparation, grading, building construction, paving, and architectural coating on the project site. Construction is completed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the site and, therefore, the noise levels surrounding the site as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. Table 14 lists typical construction equipment noise levels recommended for noise impact assessments, based on a distance of 50 feet between the equipment and a noise receptor, taken from the FHWA Roadway Construction Noise Model. In addition to the reference maximum noise level, the usage factor provided in Table 14 is used to calculate the hourly noise level impact for each piece of equipment

**Table 14
Typical Construction Equipment Noise Levels**

Equipment Description	Acoustical Usage Factor (%)¹	Maximum Noise Level (L_{max}) at 50 Feet²
Auger Drill Rig	20	84
Backhoes	40	80
Compactor (ground)	20	80
Compressor	40	80
Cranes	16	85
Dozers	40	85
Dump Trucks	40	84
Excavators	40	85
Flat Bed Trucks	40	84
Forklift	20	85
Front-end Loaders	40	80
Graders	40	85
Impact Pile Drivers	20	95
Jackhammers	20	85
Paver	50	77
Pickup Truck	40	55
Pneumatic Tools	50	85
Pumps	50	77
Rock Drills	20	85
Rollers	20	85
Scrapers	40	85
Tractors	40	84
Trencher	50	80
Welder	40	73

Source: FHWA Roadway Construction Noise Model User's Guide, Table 1 (FHWA 2006).
 Note: Noise levels reported in this table are rounded to the nearest whole number.
¹ Usage factor is the percentage of time during a construction noise operation that a piece of construction equipment is operating at full power.
² Maximum noise levels were developed based on Specification 721.560 from the Central Artery/Tunnel program to be consistent with the City of Boston's Noise Code for the "Big Dig" project.
 FHWA = Federal Highway Administration
 Lmax = maximum instantaneous sound level

The project construction composite noise levels at a distance of 50 feet would range from 74 dBA Leq to 88 dBA Leq with the highest noise levels occurring during the site preparation and grading phases. Table 15 shows the nearest sensitive uses to the project site, their distance from the center of construction activities, and composite noise levels expected during construction. These noise level projections do not consider intervening topography or barriers. Construction equipment calculations are provided in Appendix D.

**Table 15
 Potential Construction Noise Impacts at Nearest Receptor**

Receptor (Location)	Composite Noise Level (dBA Leq) at 50 Feet ¹	Distance (feet)	Composite Noise Level (dBA Leq)
Industrial Uses (West)	88	315	72
Industrial Uses (South)		485	68
Commercial Uses (North)		485	68
School (South)		715	63
Source: Compiled by LSA (2023). ¹ The composite construction noise level represents the site preparation and paving phases which are expected to result in the greatest noise level as compared to other phases. dBA Leq = average A-weighted hourly noise level			

While construction noise would vary, it is expected that composite noise levels during construction at the nearest off-site industrial uses to the east would reach 72 dBA Leq while construction noise levels would approach 63 dBA Leq at the nearest sensitive use (School) to the south during daytime hours. These predicted noise levels would only occur when all construction equipment is operating simultaneously; and therefore, are assumed to be conservative. While construction-related short-term noise levels have the potential to be higher than existing ambient noise levels in the project area under existing conditions, the noise impacts would no longer occur once project construction is completed.

Noise impacts associated with construction activities are regulated by the City's noise ordinance. The proposed project would comply with the construction hours specified in the City's Noise Ordinance, which states that construction activities are allowed between the hours of 7:00 a.m. and 6:00 p.m. on weekdays, including Saturdays, with no activities taking place at any time on Sundays or federal holidays.

As it relates to off-site uses, construction-related noise impacts would remain below the 80 dBA Leq and 90 dBA Leq construction noise level criteria, as established by the FTA for residential and industrial land uses, respectively, for the average daily condition as modeled from the center of the project site and therefore would be considered less than significant. Best construction practices shall be implemented to minimize noise impacts to surrounding receptors. Adhering to the practices outlined

below, would ensure impacts to the surrounding area from construction-related activities would be less than significant.

Construction Noise Control Best Management Practices.

In addition to compliance with the City's Municipal Code, which states that construction activities are allowed between the hours of 7:00 a.m. and 6:00 p.m. on weekdays, including Saturdays, with no activities taking place at any time on Sundays or federal holidays, the following best construction practices would further minimize construction noise impacts:

- The project construction contractor shall equip all construction equipment, fixed or mobile, with properly operating and maintained noise mufflers consistent with manufacturer's standards.
- The project construction contractor shall locate staging areas away from off-site sensitive uses during the later phases of project development.
- The project construction contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the project site whenever feasible.

Operational Noise Impact Analysis

Long-Term Off-Site Traffic Noise Impacts

As a result of the implementation of the proposed project, off-site traffic volumes on surrounding roadways have the potential to increase. The proposed project trips generated were obtained from the *Focused Traffic Analysis for the 301 Tennessee Street Industrial Building*. The proposed project would generate a net increase of 71 passenger car equivalent (PCE) trips. Based on data from the City of Redlands Maps and Geographic Data, the existing average daily traffic (ADT) on Tennessee Street is 12,000.

An increase of approximately 0.02 dBA CNEL is expected along the streets adjacent to the project site. A noise level increase of less than 1 dBA would not be perceptible to the human ear; therefore, the traffic noise increase in the vicinity of the project site resulting from the proposed project would be less than significant.

Long-Term Off-Site Stationary Noise Impacts

Adjacent off-site land uses would be potentially exposed to stationary-source noise impacts from the proposed on-site mechanical equipment, trash bin activities, and truck deliveries and loading and unloading activities. The potential noise impacts to off-site sensitive land uses from the proposed HVAC equipment, cold storage fan units, trash bin emptying, and truck delivery activities are discussed below. To provide a conservative analysis, it is assumed that operations would occur equally during all hours of the day and that half the 25 loading docks would be active at all times. Additionally, it is assumed that within any given hour, three heavy trucks would maneuver to park near or back into one of the proposed loading docks. To determine the future noise impacts from project operations to the noise sensitive uses, a 3-D noise model, SoundPLAN, was used to incorporate the site topography as well as the shielding from the proposed building on-site.

Heating, Ventilation, and Air Conditioning Equipment

The project would have various rooftop mechanical equipment including HVAC units on the proposed building. To be conservative, it is assumed the project could have eight (8) rooftop HVAC units and operate 24 hours per day and would generate sound power levels (SPL) of up to 87.9 dBA SPL, based on manufacturer data (Trane).

Trash Bin Emptying Activities

The project is estimated to have a trash dumpster near the western property line of the proposed project site. The trash emptying activities would occur for a period less than one minute and would generate sound power levels (SPL) of up to 118.6 dBA SPL or 84 dBA Leq at 50 feet, based on reference information within SoundPLAN.

Cold Storage Fan Units

According to the project description, approximately 10% of the project could be utilized for cold storage. Noise levels generated by cold storage fan units would be similar to noise readings from previously gathered reference noise level measurements, which generate a noise level of 57.5 dBA Leq at 60 ft based on measurements taken by LSA (Operational Noise Impact Analysis for Richmond Wholesale Meat Distribution Center [LSA 2016]).

Truck Deliveries and Truck Loading and Unloading Activities

Noise levels generated by delivery trucks would be similar to noise readings from truck loading and unloading activities, which generate a noise level of 75 dBA Leq at 20 ft based on measurements taken by LSA. Shorter term noise levels that occur during the docking process taken by LSA were measured to be 76.3 dBA L8 at 20 ft. Delivery trucks would arrive on site and maneuver their trailers so that trailers would be parked within the loading docks. During this process, noise levels are associated with the truck engine noise, air brakes, and back-up alarms while the truck is backing into the dock. These noise levels would occur for a shorter period of time (less than five minutes). After a truck enters the loading dock, the doors would be closed, and the remainder of the truck loading activities would be enclosed and therefore much less perceptible. To present a conservative assessment, it is assumed that truck arrivals and departure activities could occur twice in a given hour for a period of less than five (5) minutes each and unloading activities could occur at 13 docks simultaneously for a period of more than 30 minutes in a given hour.

Combined Project Operations

As show in the Appendix D, the operational noise levels associated with the proposed project would not exceed 75 dBA Leq at the project boundaries, therefore, noise levels would noise exceed the City's exterior noise level limit of 75 dBA Leq anytime for industrial uses. Tables K and L below show the combined hourly noise levels generated by HVAC equipment, cold storage fans, trash emptying activities, and truck delivery activities at the closest off-site, non-industrial, land uses. The project-related noise level impacts would approach 47.5 dBA at the office uses to the north during daytime and nighttime hours and 38.5 dBA at the school to the south during daytime hours. These levels would be well below the City's exterior daytime noise standard of 65 dBA Leq for office uses and the exterior daytime standard of 60 dBA Leq for institutional uses (school) as well as 60 dBA Leq for office uses during nighttime hours. It is assumed that project operations during the more sensitive nighttime hours would not affect the school use to the south as the school would not be in operation during those hours. The project-related noise level impacts would approach 47.5 dBA at the office uses to the north.

Because project noise levels would not generate a noise level increase of 4 dBA when ambient noise levels exceed the City's exterior noise standards or generate a noise level increase of 6 dBA when ambient noise levels are below the City's exterior noise standards, impacts to the surrounding areas from project operation would be less than significant.

b) Less than Significant Impact.

Construction Vibration Impacts

This construction vibration impact analysis discusses the level of human annoyance using vibration levels in root-mean-square (RMS) (in/sec) and assesses the potential for building damages using vibration levels in peak particle velocity (PPV) (in/sec). This is because vibration levels calculated in RMS are best for characterizing human response to building vibration, while vibration level in PPV is best for characterizing potential for damage. Table 16 shows the PPV and RMS values at 25 ft. from the construction vibration source. As shown in Table 16, bulldozers, and other heavy-tracked construction equipment (expected to be used for this project) generate approximately 0.089 PPV in/sec or 0.063 in/sec RMS of ground-borne vibration when measured at 25 ft. The distance to the nearest buildings for vibration impact analysis is measured between the nearest off-site buildings and the project construction boundary (assuming the construction equipment would be used at or near the project setback line).

Table 16
Vibration Source Amplitudes for Construction Equipment

Equipment	Reference PPV/RMS at 25 Feet	
	PPV (in./sec.)	RMS (in./sec.)
Pile Driver (Impact), Typical	0.644	0.457
Pile Driver (Sonic), Typical	0.170	0.121
Vibratory Roller	0.210	0.149
Hoe Ram	0.089	0.063
Large Bulldozer¹	0.089	0.063
Caisson Drilling	0.089	0.063
Loaded Trucks¹	0.076	0.054
Jackhammer	0.035	0.025
Small Bulldozer	0.003	0.002

Source: *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018).
¹ Equipment shown in **bold** is expected to be used on site.
ft = foot/feet
FTA = Federal Transit Administration
in/sec = inch/inches per second

Table 17
Potential Construction Vibration Annoyance Impacts at Nearest Receptor

Receptor (Location)	Composite Noise Level (dBA L _{eq}) at 50 Feet ¹	Distance (feet)	Composite Noise Level (dBA L _{eq})
Industrial Uses (West)	0.063	315	0.0014
Industrial Uses (South)		485	0.0007
Commercial Uses (North)		485	0.0007
School (South)		715	0.0004

Source: Compiled by LSA (2023).
¹ The reference vibration level is associated with a large bulldozer which is expected to be representative of the heavy equipment used during construction.
² The reference distance is associated with the average condition, identified by the distance from the center of construction activities to surrounding uses
ft = foot/feet
in/sec = inch/inches per second
RMS = root mean square velocity

**Table 18
Potential Construction Vibration Damage Impacts at Nearest Receptor**

Receptor (Location)	Composite Noise Level (dBA L _{eq}) at 50 Feet ¹	Distance (feet)	Composite Noise Level (dBA L _{eq})
Industrial Uses (West)	0.089	100	0.011
Industrial Uses (South)		140	0.007
Commercial Uses (North)		155	0.006
School (South)		380	0.002
Source: Compiled by LSA (2023). ¹ The reference vibration level is associated with a large bulldozer which is expected to be representative of the heavy equipment used during construction. ² The reference distance is associated with the peak condition, identified by the distance from the perimeter of construction activities to surrounding structures ft = foot/feet in/sec = inch/inches per second PPV = peak particle velocity			

As discussed above, the threshold at which vibration levels would result in annoyance would be 0.01 in/sec RMS and the FTA guidelines indicate that for a non-engineered timber and masonry building, the construction vibration damage criterion is 0.2 in/sec in PPV.

Based on the information provided in Table 17, vibration levels are expected to approach 0.0014 in/sec RMS at the closest industrial uses to the west and 0.0004 in/sec RMS at the closest sensitive use (School) to the south and would not exceed the annoyance thresholds.

Based on the information provided in Table 18, vibration levels are expected to approach 0.011 at the surrounding structures and would be below the 0.2 PPV in/sec threshold. Other building structures surrounding the project site are farther away and would experience further reduced vibration. Therefore, no construction vibration impacts would occur, impacts will be less than significant.

Operational Vibration Impacts

The proposed project would not generate vibration levels related to on-site operations. In addition, vibration levels generated from project-related traffic on the adjacent roadways are unusual for on-road vehicles because the rubber tires and suspension systems of on-road vehicles provide vibration isolation. Vibration levels generated from project-related traffic on the adjacent roadways would be less than significant.

c) Less than Significant Impact. Aircraft flyovers may be audible on the project site due to aircraft activity in the vicinity. The nearest airports to the project are San Bernardino International Airport (SBIA) and Redlands Municipal Airport (REI) approximately 3.30 miles to the northwest and northeast of project site, respectively. The project site is located well outside the SBD Airport Influence Area according to the 2017 Existing CNEL Contours and Generalized Land Uses – San Bernardino International Airport (San Bernardino County, 2017) as well as outside the REI 60 dBA CNEL Airport Noise Contour according to Figure 7-7: Airport Hazards in the City’s General Plan.³⁵ Therefore, the project would not be adversely affected by airport/airfield noise, nor would the project contribute to or result in adverse airport/airfield noise impacts, and as such, impacts would be less than significant.

4.13 – Population and Housing

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Less than Significant Impact The project site is designated for light industrial uses and is currently occupied by a warehouse building and one unoccupied single-family home. Because the proposed project would replace an existing use, and potential employees of the proposed warehouse would be drawn from the existing population in the area, it is not anticipated that the proposed project would result in a substantial increase in the number of employees on the project site. In addition, the project does not involve the extension of roads or other major infrastructure improvements that would indirectly induce unplanned population growth. The project complies with the City of Redlands General Plan and Zoning Ordinance.³⁶ The project site is zoned as Light Industrial for industrial, manufacturing, and warehousing purposes. The project is consistent with this criterion and is consistent with the anticipated buildout of the City’s General Plan and would not induce any unplanned population growth. Impacts will be less than significant.

b) No Impact. Currently there is a single-family home located on the project site, however the home is not occupied. No housing would be displaced as a result of project development and as such there will be no impact.

4.14 – Public Services

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Less than Significant Impact. The project is located in the service area of the City of Redlands Fire Department. The Fire Department responds to medical emergencies, hazardous materials incidents, rescue calls, and motor-related accidents, in addition to regular fire suppression services. There are four stations in Redlands³⁷:

- Fire Station 261: 525 E Citrus Ave.
- Fire Station 262: 1690 Garden St.
- Fire Station 263: 10 W Pennsylvania Ave.
- Fire Station 264: 1270 W Park Ave.

The fire station nearest to the project site is Station 264, located approximately one quarter mile to the north. Future tenants of the proposed industrial facility that may store and use hazardous materials would be required to adhere to local and state regulations pertaining to the handling and storage of such materials. The project may create an incremental increase in demand for fire services. Development impact fees that are collected at the time of building permit issuance for approved projects would offset any incremental in demand for fire protection and emergency medical services. Fees go towards fire facilities and charge at a current rate of \$716.94 per 1,000 square feet of office space, and \$223.67 per 1,000 square feet of warehouse space.³⁸ Impacts related to expansion of fire protection services will be less than significant.

b) Less than Significant Impact. The project area is served by the Redlands Police Department. The Police Department and Patrol building is located at 1270 W Park Ave, Building C, Redlands, CA 92373. The station is approximately 0.3 miles north of the project site. Development of the project site may generate an incremental increase in the need for police protection in the project area. However, this incremental increase is consistent with the buildout of the City’s General Plan. The Police Department reviews its needs on a yearly basis and adjusts service levels as needed to maintain an adequate level

of public protection. Additionally, Development Impact Fees collected at the time of building permit issuance will help to offset incremental impacts of development on demand for services. Fees go towards law enforcement facilities and charge a current rate of \$37.40 per 1,000 square feet of office space, and \$11.67 per 1,000 square foot warehouse space.³⁹ Therefore, a less than significant impact to police services would occur.

c) Less than Significant Impact. The project includes construction of a warehouse facility, associated parking, and landscape improvements. The project will not result in any direct population growth, or associated growth in students, within the Redlands Unified School District. As most of the employees that would staff the warehouse could be expected to come from the local population, a substantial increase in the school populations is unlikely. However, payment of development impact fees required under State law would offset the cost of increased demand for school district facilities in the future. The Redlands Unified School District has established a school fee and charge a current rate of \$0.56 per square foot of industrial development built.⁴⁰ Any project impacts on school facilities would be less than significant.

d) Less than Significant Impact. Development of the project could have the potential to impact demand on parks and recreation facilities if it induced substantial population growth in the area. However, as most of the staff of the warehouse could reasonably be expected to come from the local population, the project is not expected to induce significant change to the local population. As such, the proposed warehouse project will not result in any direct population growth that would require expansion or acquisition of recreational facilities. Less than significant impacts would occur.

e) Less than Significant Impact. The project is not expected to create an increase in residents that would generate additional demand for public facilities. However, payment of development impact fees required determined by the City of Redlands would offset the cost of increased demand for such facilities in the future. Fees for public facilities are at a current rate of \$852.83 per 1,000 square feet of office space, and \$266.06 per 1,000 square feet of warehousing.⁴¹ Potential impacts to public facilities in Redlands would be less than significant.

4.15 – Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) No Impact. The project includes the demolition of the former 193,469 square foot La-Z-Boy warehouse, and the construction of a 197,397 square foot light industrial building. Employees of the warehouse would be drawn from existing residents within or near the City of Redlands. As such, the project itself would not create demand for additional parks, or other recreational activities as the workforce would be drawn from the existing population of the area and from additional housing planned by the City to accommodate anticipated buildout of the City’s General Plan. There are no anticipated impacts to recreational facilities.

b) No Impact. The project does not include any recreational facilities or require the construction of new facilities, and there would not be an adverse physical effect to the environment. Therefore, there would be no impact.

4.16 – Transportation

Would the project:

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

A *Focused Traffic Analysis and VMT Screening Analysis* for the proposed project was prepared by EPD Solutions, Inc., dated January 30th, 2023 (See Appendix E). The information presented below is provided from the aforementioned evaluations.

a) Less than Significant Impact. The Focused Traffic Analysis and VMT Screening Analysis was prepared to determine whether the project meets the VMT requirements for the San Bernardino County Transportation Authority (SBCTA) Guidelines and screens out from needing to conduct a detailed analysis. In addition, CEQA Guidelines section 15064.3(A) states that Vehicle Miles Traveled is the most appropriate measure for transportation impacts, and Level of Service shall not be considered an environmental impact and “a project’s effect on automobile delay shall not constitute a significant environmental impact” (for CEQA purposes). Table 19 below shows the estimated trip generation for the proposed project based on trip generation rates collected from the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021). The vehicle mix was also determined using the ITE Manual. The forecast was determined by using ITE Land Use Code 110 General Light Industrial, and 140 Manufacturing to derive net site specific trip generation estimates for the proposed 197,397 square foot warehousing project, which includes the storage and cold storage of materials and the use of office and maintenance areas.

The trip generation takes credit for the existing warehouse and single-family house. As shown in Table 19, the existing manufacturing use is estimated to generate a total of 919 daily trips including 132 AM peak hour trips and 143 PM peak hour trips whereas the single-family house is estimated to generate a total of 9 daily trips including 1 AM peak hour trip and 1 PM peak hour trip. When adjusted for heavy truck trips and applying a passenger car equivalent (PCE) factors the existing manufacturing use would generate 1,307 daily trips including 190 PCE trips during the AM peak hour and 206 PCE trips during

the PM peak hour. In total, the existing land use generates 1,316 daily PCE trips, 191 PCE trips during the AM peak hour and 207 PCE trips during the PM peak hour. The proposed general light industrial use, including 10% cold storage, would generate 1,387 daily PCE trips, 212 PCE trips during the AM peak hour, and 187 PCE trips during the PM peak hour.

The resulting net trip generation on the project site would result in 71 daily PCE trips, 21 PCE trips during the AM peak hour, and -20 PCE trips during the PM peak hour. The project trips were distributed throughout the study area based on logical travel paths and patterns. The project truck and passenger car trip distribution and the project trip assignment are provided in Appendix E.

**Table 19
Proposed Project Trip Generation**

Land Use	Units	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total	
Trip Rates								
General Light Industrial	TSF	0.65	0.09	0.74	0.09	0.56	0.65	4.87
Manufacturing	TSF	0.52	0.16	0.68	0.23	0.51	0.74	4.75
Single-Family Detached Housing	DU	0.182	0.518	0.7	0.5922	0.3478	.94	9.43

Existing Trip Generation	Units	AM Peak Hour			PM Peak Hour			Daily	
		In	Out	Total	In	Out	Total		
Existing Manufacturing Building	193,469	TSF	-100	-32	-132	-44	-99	-143	-919
Vehicle Mix²		Percent^{2,4}							
Passenger Vehicles	72.50%		-73	-23	-96	-32	-72	-104	-666
2-Axle truck	4.60%		-5	-1	-6	-2	-5	-7	-42
3-Axle truck	5.70%		-6	-2	-8	-3	-6	-9	-52
4+ -Axle trucks	17.20%		-17	-6	-23	-8	-17	-25	-158
Total	100%		-101	-31	-132	-45	-100	-145	-919

PCE Trip Generation ³	PCE Factor	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total	
Passenger Vehicles	1.0	-73	-23	-96	-32	-72	-104	-666
2-Axle truck	1.5	-8	-1	-9	-3	-8	-11	-63
3-Axle truck	2.0	-12	-4	-16	-6	-10	-16	-104
4+ -Axle trucks	3.0	-51	-18	-69	-24	-51	-75	-474
Existing Manufacturing Building (PCE)		-144	-46	-190	-65	-141	-206	-1307

Single Family Residential⁶									
Passenger Vehicles	1	DU	-1	-1	-1	-1	-1	-1	-9

Total Existing Trip Generation			-101	-33	-133	-45	-100	-144	-928
Total Existing Trip Generation (PCE)			-145	-47	-191	-68	-142	-207	-1316

Proposed Project Trip Generation	Units	AM Peak Hour			PM Peak Hour			Daily	
		In	Out	Total	In	Out	Total		
Proposed General Light Industrial	197,397	TSF	129	18	146	18	110	128	961
Vehicle Mix (90% Warehousing)²		Percent²							

4 – Evaluation of Environmental Impacts

Passenger Vehicles		72.50%	84	12	96	12	72	84	627
2-Axle truck		4.60%	5	1	6	1	5	6	40
3-Axle truck		5.70%	7	1	8	1	6	7	49
4+ -Axle trucks		17.20%	20	3	23	3	17	20	149
Total		100%	116	17	133	17	100	117	865

Vehicle Mix (10% Cold Storage)⁵		Percent⁵							
Passenger Vehicles		55.30%	7	1	8	0	7	7	53
2-Axle truck		15.50%	2	0	2	0	1	1	15
3-Axle truck		4.90%	1	0	1	0	0	0	5
4+ -Axle trucks		24.30%	3	0	3	0	3	3	23
Total		100%	13	1	14	0	11	11	96

PCE Trip Generation ³	PCE Factor	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total	
Passenger Vehicles	1.0	91	13	104	12	79	91	680
2-Axle truck	1.5	11	2	13	2	9	11	83
3-Axle truck	2.0	16	2	18	2	12	14	108
4+ -Axle trucks	3.0	69	9	78	9	60	69	516
Proposed General Light Industrial Building (PCE)		187	26	213	26	160	185	1387
Total Existing Trip Generation (PCE)		-144	-44	-188	-66	-143	-209	-1317
NET PCE Trip Generation		43	-18	25	-41	17	-24	70

TSF = Thousand Square Feet

PCE = Passenger Car Equivalent

¹ Trip rates from the Institute of Transportation Engineers, Trip Generation, 11th Edition, 2021. Land Use Code 110 General Light Industrial, 140 Manufacturing.

² Vehicle Mix from the Warehouse Truck Trip Study Data Results and Usage, Southern California Air Quality Management District Warehouse Truck Trip Study July 17, 2014. Without Cold Storage.

³ Passenger Car Equivalent (PCE) factors from the San Bernardino County CMP, Appendix B – Guidelines for CMP Traffic Impact Analysis Reports in San Bernardino County, 2016.

⁴ Total trip generation for this line rounded to match non-vehicle mix trip generation estimate.

⁵ Vehicle Mix from the Warehouse Truck Trip Study Data Results and Usage, Southern California Air Quality Management District Warehouse Truck Trip Study July 17, 2014. With Cold Storage.

Measure U Focused Traffic Analysis

Measure U was an initiative approved by the voters of Redlands in 1997 to enact several principles of managed development within the City of Redlands. The principles in Measure U have been incorporated throughout the new 2035 General Plan, as well as several sections of the Redlands Municipal Code. The Focused Traffic Analysis evaluated the project using the applicable Measure U Policies identified in the Connected City Element of the City of Redlands 2035 General Plan as well as the County of San Bernardino Transportation Impact Study Guidelines (TIS Guidelines). The Measure U Policies are largely based on Level of Service (LOS) standards that measure traffic congestion. A detailed LOS evaluation is included in the Focused Traffic Analysis (See Appendix E) in order to demonstrate project compliance with Measure U. Each Measure U policy is provided below followed by a brief explanation of how the project complies with the policy.

Policy 5.20a: Maintain LOS C or better as the standard at all intersections presently at LOS C or better.

As shown in Table 20 of the Focused Traffic Analysis, all study intersections currently operate at LOS C or better except for the intersection of Kansas Street and State Street during the AM Peak hour. The addition of project traffic would not cause any location to deteriorate from LOS C to worse than LOS C.

Policy 5.20b: Within the area identified in GP Figure 5-1, including that unincorporated County area identified on GP Figure 5-1 as the “donut hole”, maintain LOS C or better; however, accept a reduced LOS on a case-by-case basis upon approval by a four-fifths (4/5ths) vote of the total authorized membership of the City Council.

It is to be noted that Measure U Policy 5.20b would not apply since the project is not within the area identified in GP Figure 5-1.

5.20c: Where the current level of service at a location within the City of Redlands is below the Level of Service (LOS) 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.

As shown in Table 20, the intersection of Kansas Street and State Street would operate at LOS F during the AM peak hour. Addition of project traffic would not change the delay or LOS at the intersection. Therefore, no mitigation is necessary as the project does not reduce the existing level of service at the intersection.

5.20f: If monitoring of conditions at intersections within the East Valley Corridor Specific Plan area and intersections affected by EVC development indicates that peak hour LOS will drop below the standards set by Policies 5.20a, 5.20b, 5.20c revise the EVC Specific Plan. Revisions necessary may include additional roadway improvements, mandated higher TDM (Travel Demand Management, See Section 5.40) reductions in single-occupant vehicle trip share, reduction of intensity of development, or changes in use of undeveloped sites.

As discussed above, the project does not result in a drop in LOS at any intersection and therefore would not cause the LOS to drop below the referenced standards. The proposed project’s study area intersections were evaluated with and without project trips to comply with the City’s Measure U policies by determining if the project would cause any LOS deficiencies. As previously noted, CEQA Guidelines section 15064.3(A) states that Vehicle Miles Traveled is the most appropriate measure for transportation impacts, and Level of Service shall not be considered an environmental impact and “a project’s effect on automobile delay shall not constitute a significant environmental impact” (for CEQA purposes). All study area intersections would operate at satisfactory LOS in the Existing and Existing Plus Project Conditions except for the intersection of Kansas Street and State Street which would continue to operate at an LOS F; however, the project does not impact the intersection since it does not increase the time delay. As such, the project would not result in any unsatisfactory LOS; therefore, the project would be in compliance with Measure U, no improvements would be required, and impacts would be less than significant.

b) Less than Significant Impact. In December 2018, the California Natural Resources Agency certified and adopted the updated CEQA Guidelines package. The amended CEQA Guidelines, specifically Section 15064.3, recommend the use of Vehicle Miles Travelled (VMT) as the primary metric for the evaluation of transportation impacts, under CEQA, associated with land use and transportation projects. In general terms, VMT quantifies the amount and distance of automobile travel attributable to a project or region. All agencies and projects State-wide are required to utilize the updated CEQA guidelines recommending the use of VMT for evaluating transportation impacts as of July 1, 2020. CEQA Guidelines allow for lead agency discretion in establishing methodologies and thresholds provided there is substantial evidence to demonstrate that the established procedures promote the

intended goals of the legislation. The City of Redlands CEQA Assessment VMT Analysis Guidelines provides guidelines for analysis of transportation impacts under CEQA. The guidelines also provide three types of screening that can be applied to determine if a project is exempt from project-level VMT analysis. The project was screened using the SBCTA VMT Screening Tool. If a project meets one of the following criteria, then the VMT impact of the project is considered less-than significant and no further analysis of VMT would be required:

1. The project is located within a Transit Priority Area.
2. The project is located in a low VMT generating area.
3. The project is considered a local serving use or would generate less than 3,000 metric tons of CO₂ equivalent (3,000 MT CO₂e) per year.

Below are the results of the screening criteria satisfaction for the project:

Screening Criteria 1 – The project is located within a Transit Priority Area:

The SBCTA tool illustrates that a majority of the project site is located within a Transit Priority Area, however this criterion would not apply as the project has a floor area ratio (FAR) of 0.44. The City of Redlands CEQA Assessment VMT Analysis Guidelines state that this criterion should be applied to projects with an FAR of 0.75 or more.

Screening Criteria 2 – Low VMT Generating Area:

The City's guidelines include a screening threshold for projects located in a low VMT generating area. The project's site was evaluated using the SBCTA VMT Screening Tool as discussed previously. The project is located within TAZ 53827301. The criteria applied to this project was 15% below the County baseline using the Origin-Destination VMT per Service Population. As shown in Appendix E, the Countywide VMT/Service Population is 33.3 and the threshold would be 28.3 VMT/Service Population. The screening tool indicates that these TAZs have an OD VMT/Service Population of 61.7. This is 85.29% above the threshold and would not be considered to generate a low VMT.

Screening Criteria 3 - The project is considered a local serving use or would generate less than 3,000 metric tons of CO₂ equivalent (3,000 MT CO₂e) per year.

Under the Project Type Screening criteria, projects which generate less than 3,000 MT CO₂e per year can be presumed to have a less than significant impact on VMT. The project meets the criteria for classification as a warehousing land use. The City of Redlands guidelines state that warehousing uses of 463,400 square feet or less are presumed to generate less than 3,000 metric tons of CO₂ equivalent (3,000 MT CO₂e) per year and can be presumed to result in a less than significant VMT impact.

The proposed project is determined to have a less than significant impact on VMT since it satisfies one of more of the VMT screening criteria established by the City of Redlands CEQA Assessment VMT Analysis Guidelines. The project's VMT impact is considered less than significant and no additional VMT analysis is required.

c) Less than Significant Impact. A significant impact would occur if the proposed project substantially increased an existing hazardous design feature or introduced incompatible uses to the existing traffic pattern. Access to the site would be provided via four driveways; two driveways on Tennessee Street: a 40-foot truck accessible driveway located at the northeast corner of the site and a 30-foot driveway for passenger cars only located at the southeast corner of the project. Additionally, a 40-foot driveway for truck access will be located on West State Street, and another 40-foot driveway for both truck and passenger car access will be located on Kansas Street. The project does not involve any changes to the alignment or uses of existing roadways, and the proposed project is consistent with City of Redlands driveway spacing and design requirements. Construction operations occurring on site would comply with

the California Building Code adopted in the City of Redlands Municipal Code.⁴² The proposed project would not result in a traffic safety hazard due to any design features, and impacts would be less than significant.

d) Less than Significant Impact. A significant impact would occur if the design of the proposed project would not satisfy emergency access requirements of the City of Redlands Fire Department or in any other way threaten the ability of emergency vehicles to access and serve the project site or adjacent uses. The proposed project would not result in inadequate emergency access. As previously discussed above, access to the site will be provided via four driveways; a 40-foot truck accessible driveway and a 30-foot driveway passenger car driveway on Tennessee Street, a 40-foot truck accessible driveway on West State Street, and another 40-foot truck and passenger car accessible driveway on Kansas Street. The driveway width is sufficient to provide access to fire and emergency vehicles and is consistent with California Fire Code requirements. All access features are subject to and must satisfy the City of Redlands design requirements, including the Fire Department's requirements. This project would therefore not result in adverse impacts with regard to emergency access. Impacts would be less than significant.

4.17 – Tribal Cultural Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a Cultural Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a.i) Less than Significant with Mitigation Incorporated. A significant impact would occur if the proposed project would cause a substantial adverse change in the significance of a tribal cultural resource listed or eligible for listing in the California Resources of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). The project site is currently developed, and there are no historic resources on, adjacent to, or in proximity to the project site listed in the California Register of Historical Resources pursuant to Section 15064.5. The City does not have any landmarks listed under its historic preservation program as defined in Public Resources Code Section 5020.1(k). However, in compliance with Assembly Bill 52, Native American tribes traditionally and culturally affiliated with the geographic area of the Project site were notified of the proposed Project on September 22, 2022 (See Appendix D). The tribes notified included:

- Gabrieleno Band of Mission Indians – Kizh Nation
- Morongo Band of Mission Indians
- Soboba Band of Luiseno Indians
- Torres Martinez Desert Cahuilla Indian
- The Yuhaaviatam of San Manuel Nation (formerly known as the San Manuel Band of Mission Indians)

On September 26, 2022, the City received a response from Ryan Nordness, Cultural Resources Analyst for the Yuhaaviatam of San Manuel Nation (YSMN). In the email, Mr. Nordness noted the project site is located in the Serrano ancestral territory and is of interest to the Tribe. However, given the “nature and location of the project” and the current state of knowledge regarding the area, YSMN has no concerns with the implementation of the project as planned. Furthermore, in the response, the YSMN requested that mitigation measures be included to reduce potential impacts to less than significant. Therefore, with incorporation of **Mitigation Measures TCR-1 and TCR-2**, impacts to listed or eligible tribal cultural resources would be less than significant.

a.ii) Less than Significant with Mitigation Incorporated. Government Code §§ 65352.3 and 65562.5 (SB 18); and Public Resources Code §§ 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3 (AB 52) provide that a project that may cause a substantial adverse change to a defined Tribal Cultural Resource (TCR) can result in a significant effect on the environment. AB 52 requires tribes interested in development projects within a traditionally and culturally affiliated geographic area to notify a lead agency of such interest and to request notification of future projects subject to CEQA prior to determining if a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. The Lead Agency is required to notify tribes within 14 days of deeming a development application complete subject to CEQA to notify the requesting tribe as an invitation to consult on the project. AB 52 identifies examples of mitigation measures that will avoid or minimize impacts to TCR. The bill makes the above provisions applicable to projects that have a notice of preparation or a notice of intent to adopt a negative declaration/mitigated negative declaration circulated on or after July 1, 2015. Although there is no indication of TCRs at the project site, AB 52 is clear in stating that it is the responsibility of the Public Agency (i.e., Lead Agency) to consult with Native American tribes early in the CEQA process to allow tribal governments, lead agencies, and project proponents to discuss the appropriate level of environment review, identify and address potential adverse impacts to TCRs, and reduce the potential for delay and conflict in the environmental review process (see Public Resources Code Section 2108.3.2). Specifically, government-to-government consultation may provide “tribal knowledge” of the project area that can be used in identifying TCRs that cannot be obtained through other investigative means. Pursuant to AB 52, as the CEQA Lead Agency, the City of Redlands sent AB 52 consultation notification letters via email on September 22, 2022. On September 26, 2022, the City received a response from Ryan Nordness, Cultural Resources Analyst for the Yuhaaviatam of San Manuel Nation (YSMN). In the email, YSMN requested that mitigation measures be included to reduce potential impacts to less than significant. Therefore, with incorporation of **Mitigation Measures TCR-1 and TCR-2**, impacts to listed or eligible tribal cultural resources would be less than significant.

Mitigation Measures

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 YSMN elect to place a monitor on-site.

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.

4.18 - Utilities and Service Systems

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of State and local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Less than Significant Impact. The Redlands Municipal Utilities & Engineering Department delivers water to over 23,000 service connections throughout its service area, including those in Redlands, Mentone, parts of Crafton Hills, San Timoteo Canyon, and San Bernardino. The Department receives its water from a mix of sources including local groundwater wells, the Mill Creek Watershed, Santa Ana Watershed, and imported water provided through the State Water Project. The City utilizes 23 groundwater wells, 44 booster pumps, 18 reservoirs, and 450 miles of transmission lines to deliver water.⁴³ Additionally, the City operates two surface water treatment plants, Tate and Hinkley, which provide treated water from the Mill Creek and Santa Ana watersheds respectively, and State Water Project (SWP).⁴⁴ The City maintains ownership in multiple local private and mutual water companies to

bolster and secure reliable water supplies for their treatment plants. Wastewater is collected and treated at the Redlands Wastewater Treatment Facility and has a treatment capacity of 9.5 million gallons.

As discussed in the Hydrology and Water Quality section and Project Description, the project would install new water and sewer lines onsite connecting to the existing infrastructure in Redlands. The project would not generate substantially increased runoff from new impermeable surfaces on site. As part of the proposed project, catch basins and landscape drains will collect surface runoff onsite for treatment. The subsurface storm drain would move surface flows to an underground infiltration system located in the northwestern area of the project site. No additional improvements are anticipated to either sewer lines or treatment facilities to serve the project. Standard connection fees would address any incremental impacts of the project. Therefore, the project would result in less than significant impact as a result of new or expanded water supply and wastewater treatment facilities.

Impacts related to electric power, natural gas, and telecommunications facilities would also be less than significant. The project will connect to existing facilities and will not require any extension of services. Therefore, the proposed warehouse would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause a significant environmental effect. Less than significant impacts would occur.

b) Less than Significant Impact. According to the *2020 Integrated Regional Urban Water Management Plan (UWMP)* for the Upper Santa Ana River Watershed Region, the City of Redlands is projected to have a total demand of 25,818 acre-feet (AF) in 2025.⁴⁵ The same estimates calculated a supply total of 31,039 AF in 2020, a difference of 5,221 AF. The project would generate a marginal increase in additional demand for water from the City of Redlands' water supply, relative to overall existing citywide demand. As the Urban Water Management Plan anticipates an overall increase in demand associated with development in the area over 2015 conditions, and the proposed project is within the expected buildout and zoning of the City, water demand for this project is within that demand assumption, and as such, impacts would be less than significant. The project would not substantially deplete water supplies, and the project would have a less than significant impact on entitled water supplies.

c) Less than Significant Impact. Potentially significant impacts could occur as a result of this project if it results in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. As detailed in Sections 4.19.a and 4.19.b, the project would be adequately served by existing wastewater treatment facilities. Therefore, a less than significant impact would occur.

d) Less than Significant Impact. Significant impacts could occur if the proposed project would exceed the existing permitted landfill capacity or violates federal, state, and local statutes and regulations. Solid waste disposal services are overseen by the City of Redlands Trash Collection. Solid waste collected in Redlands is primarily transferred to the San Timoteo Landfill in Redlands, located approximately 6 miles south of the project site. According to CalRecycle, the San Timoteo Landfill has a maximum capacity of 23,685,785 tons, with a remaining capacity of 12,360,396 tons measured April 30th, 2019.⁴⁶ Construction of the facility is anticipated to generate some solid waste, with an estimated total waste generation of approximately 5044.3 lbs., per employee, per year.⁴⁷ Because there would be adequate landfill capacity in the region to accommodate project-generated waste, and the proposed project is not expected to generate a substantial quantity of solid waste, impacts to solid waste disposal capacity would be less than significant.

e) No Impact. The proposed project is required to comply with all applicable federal, state, County, and City statutes and regulations related to solid waste as a standard project condition of approval. Therefore, no impact would occur.

4.18 – Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) No Impact. The project site is not located within or near any State Responsibility Areas, the nearest being in adjacent Loma Linda as part of the San Timoteo Canyon.⁴⁸ There are no wildland conditions in the urbanized area where the project site is located. The City’s General Plan identifies several evacuation routes; these routes were previously designated as potential evacuation routes in the 2007 San Bernardino General Plan.⁴⁹ These include: Interstates 10, 15, 210, and 215, and State Highways 30, 60, 66, 71, and 83. In the event of an earthquake, the following roads would provide safe access out of the San Bernardino Valley, as indicated by Caltrans and cited in the Redlands General Plan:

- Hospitality Lane from Tippecanoe Avenue to Waterman Avenue
- Coulston Street from Mountain View Avenue to Tippecanoe Avenue
- Lugonia Avenue from Orange Street to Mountain View Avenue
- Redlands Boulevard from Orange Street to Waterman Avenue

The proposed project would not interfere with the availability of these highways and roadways as evacuation routes. The project would not substantially impair any adopted or informal emergency response plan or evacuation plan, as such no impact would occur.

b) No Impact. The project site is not located within a fire hazard zone, as identified on the Very High Fire Hazard Severity Zone (VHFHSZ) maps prepared by the California Department of Forestry and Fire Protection (CALFIRE).⁵⁰ The nearest VHFHSZ is located approximately 3 miles southwest of the project site just south of Beaumont Avenue in Loma Linda. The project site is located in a heavily urbanized area and would not exacerbate wildfire risks, thereby exposing occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No impact would occur.

c) No Impact. The project site is not located within or near any State Responsibility Areas as indicated in Section 4.18a. None of the project improvements would exacerbate fire risk or would result in a temporary or ongoing impact from wildfires requiring the installation or maintenance of associated infrastructure that may exacerbate fire risk, or that may result in temporary or ongoing impacts to the environment. No impact would occur.

d) No Impact. The project site is not located within or near any State Responsibility Areas. According to the Federal Emergency Management Agency (FEMA) Flood Maps, the project site is in an area of 1% annual chance flood.⁵¹ The project site is not located in a dam inundation area. The project site is located in a flat area, with little to no potential for landslides or downstream flooding or runoff. If such an event were to occur, the City of Redlands General Plan outlines policies and principles to mitigate potential impacts from flooding. Development of the proposed project would not exacerbate risks to people from flooding or landslides. No impacts would occur.

4.19 – Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Less than Significant with Impact. The proposed project would not substantially impact any scenic vistas, scenic resources, or the visual character of the area, as discussed in Section 4.1, and would not result in excessive light or glare. The project site is located within a developed area with no natural habitat. The proposed project would not significantly impact any sensitive plants, plant communities, fish, wildlife, or habitat for any sensitive species. Impacts to burrowing owl and migratory birds will be less than significant with mitigation and adherence to existing regulations. There are no jurisdictional waters on the project site. There will be no impacts to possible historical or archaeological resources.

The environmental analysis provided in Section 4.3 concludes that impacts related to emissions of criteria pollutants and other air quality impacts would be less than significant with mitigation. Section 4.8 concludes that impacts related to climate change would be less than significant. Impacts related to hydrology and water quality would be less than significant. Based on the preceding analysis of potential impacts in the responses to items 4.1 through 4.20, no evidence is presented that this proposed project would degrade the quality of the environment. Impacts related to degradation of the environment, biological resources, hydrology and water quality would be less than significant.

b) Less than Significant Impact. Cumulative impacts can result from the interactions of environmental changes resulting from one proposed project with changes resulting from other past, present, and future projects that affect the same resources, utilities and infrastructure systems, public services, transportation network elements, air basin, watershed, or other physical conditions. Such

impacts could be short-term and temporary, usually consisting of overlapping construction impacts, as well as long-term, due to the permanent land-use changes and operational characteristics involved with the proposed project. Cumulative impacts would be less than significant, as further discussed herein.

Aesthetics

Impacts related to aesthetics at the project-level have no potential for cumulative impacts because impacts are limited to on-site conditions and include no component that could result in similar impacts over time or space. Therefore, no cumulative impacts related to this topic would occur.

Agricultural Resources

The analysis provided in Sections 4.2 found that no individual impacts would occur; therefore, the Project could not contribute considerably to local agriculture or forestry.

Air Quality

The analysis provided in Section 4.3 and the Air Quality Health Risk Assessment found that impacts would be less than significant with adherence to the recommended mitigation below:

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.

Biological Resources

The analysis provided in Section 4.4 found that no individual impacts to sensitive species or migratory birds would occur with implementation of mitigation; therefore, the project would not contribute considerably to regional impacts on such species, and impacts would be less than significant. project would have no other impacts on biological resources and would not result in localized or regional cumulative impacts, and as such, impacts would be less than significant. Mitigations for nesting birds include the following:

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 *Buteo*, the 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 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

The analysis provided in Section 4.5 and the Historical/Archaeological Resources Survey found that impacts to historic or archaeological resources would be less than significant with adherence to the recommended Mitigation measures below. Mitigations for Cultural Resources include the following:

- CUL-1: Buried Cultural Resources.** 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 regards to significance and treatment.
- CUL-2: Monitoring and Treatment.** 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.
- CUL-3: Funerary Discovery.** 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.

Energy

The analysis provided in Section 4.6 found that no individual impacts related to energy use would occur as a result of the proposed project. Therefore, the project would not contribute to cumulative energy impacts.

Geology and Soils

Impacts related to geology at the project-level have no potential for cumulative impacts. Therefore, the proposed project would have no contribution to potential geological or soil degradation or other such impacts. If during construction operations, paleontological resources are discovered, **Mitigation Measure GEO-1** is given to establish proper care and attention to such discoveries. Impacts related to this topic would be less than significant. Mitigation for Geology and Soils are as follows:

- 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, 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.

Greenhouse Gas Emissions

As discussed in Section 4.8, climate change is the result of numerous, cumulative sources of greenhouse gas emissions all over the world. The project would not contribute considerably to global climate change.

Hazardous Materials

The analysis provided in Section 4.9 related to hazards and hazardous materials, and the associated Phase I Environmental Site Assessment found that impacts would be less than significant with adherence to the following mitigation measures listed below. Additionally, compliance with all regulations related to the disposal and storage of household hazardous waste would ensure that impacts would be less than significant.

HAZ-1 Soil Testing. Prior to issuance of a grading permit, representative soil sampling will be conducted onsite at depths of one 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.

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.

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 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.

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 implement Mitigation Measure HAZ-3.

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.

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.

The VIMS system shall be designed to allow regular monitoring of vapor concentrations. After occupancy, monitoring shall be conducted and documented quarterly for the first year, semi-annually the second year, and annually thereafter for five years.

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.

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 (e.g., if an underground storage tank is encountered).

Land Use and Planning

The analysis provided in Section 4.11 related to Land Use and Planning found that impacts would be less than significant; therefore, while the proposed project would contribute to individual, localized, or regional cumulative impacts, its contribution would not be considerable.

Mineral Resources

The analysis provided in Section 4.12 related to mineral resources found that there would be no impact; therefore, while the project would contribute to localized or regional cumulative impacts, the project contribution would not be considerable.

Noise

As discussed in Section 4.13, on-site operational noise is not anticipated to result in perceptible increases in ambient noise with the implementation of Best Management Practices. Therefore, the proposed project would not contribute considerably to noise levels in the immediate vicinity of the project. The project would contribute to temporary increases in noise levels in the immediate project vicinity during construction activities; however, Best Management Practices would be incorporated to ensure that impacts to nearby sensitive receptors remain less than significant. Therefore, the project would have no considerable contribution to cumulative noise impacts.

Population and Housing

The analysis provided in Section 4.14 related to Population and Housing found that no impacts would result; therefore, no cumulative impacts related to this topic would occur.

Public Services

The analysis provided in Section 4.15 related to Public Services found that impacts would be less than significant; therefore, while the proposed project would contribute to localized cumulative impacts, the contribution would not be cumulatively considerable.

Recreation

The analysis provided in Section 4.16 related to Recreation found that impacts would be less than significant; therefore, no cumulative impacts related to this topic would occur.

Traffic and Transportation

Traffic conditions were analyzed in Section 4.17 and found to be less than significant. The proposed project's contribution to cumulative impacts to local and regional transportation facilities would not be considerable.

Tribal Cultural Resources

The analysis provided in Section 4.18, the Historical/Archaeological Resources Survey, and consultation with the Yuhaaviatam of San Manuel Nation (YSMN), found that impacts to tribal cultural resources will be less than significant with adherence to the recommended Mitigation measures below. Mitigations for Cultural Resources include the following:

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 YSMN elect to place a monitor on-site.

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.

Utilities and Service Systems

4 – Evaluation of Environmental Impacts

The analysis provided in Section 4.19 related to Utilities and Service Systems found that impacts would be less than significant; therefore, while the project would contribute to localized or regional cumulative impacts, the project contribution would not be considerable.

Wildfire

The analysis provided in Section 4.20 related to Wildfire found that no impacts would result; therefore, no cumulative impacts related to this topic would occur.

c) Less than Significant Impact. The proposed project would not have environmental effects which would cause substantial adverse effects on humans, either directly or indirectly, as noted in the previous sections above.

5 Mitigation Summary

- 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.
- 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 *Buteo*, the 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 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).
- 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 regards to significance and treatment.
- 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.
- 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.

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.

HAZ-1 **Soil Testing.** Prior to issuance of a grading permit, representative soil sampling will be conducted onsite at depths of one 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.

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.

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 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.

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 implement Mitigation Measure HAZ-3.

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.

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.

The VIMS system shall be designed to allow regular monitoring of vapor concentrations. After occupancy, monitoring shall be conducted and documented quarterly for the first year, semi-annually the second year, and annually thereafter for five years.

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.

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 (e.g., if an underground storage tank is encountered).

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 YSMN elect to place a monitor on-site.

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.

This Page Intentionally Left Blank.

6.1 – List of Preparers

City of Redlands

Planning Department
35 Cajon Street, Suite 15-A
Redlands, California 92373
909-798-7555

MIG, Inc.

1650 Spruce Street, Suite 106
Riverside, California 92507
(951) 787-9222

- Bob Prasse, Director of Environmental Services
- Chris Dugan, Director of Air Quality, GHG, and Noise Services
- Kasey Kitowski, Air Quality Noise Analyst
- Duncan Edwards, Assistant Planner
- Kent Norton, Senior Projects Manager

CRM TECH (Cultural Resources)

1016 E Cooley Dr # B,
Colton, CA 92324
(909) 824-6400

- Bai “Tom” Tang, Principal Investigator | Cultural Resources Report
- Michael Hogan, Principal Investigator | Cultural Resources Report

Gandini Group Inc. (Transportation)

555 Parkcenter Drive, Suite 225
Santa Ana, CA 92705
714) 795-3100.

- Bryan Crawford, Principal Engineer | Review of VMT Assessment
- Giancarlo Gandini, Principal | Review of VMT Assessment

LSA (Air Quality, Energy, GHG, & Noise)

20 Executive Park, Suite 200
Irvine, California 92614
(949) 553-0666

6.2 – Persons and Organizations Consulted

- N/A

6.3 – Bibliography

- 1 City of Redlands. *General Plan: Distinctive City Element*. <https://www.cityofredlands.org/post/planning-division-general-plan>. [Accessed November 2022].
- 2 City of Redlands City Code. *Chapter 18.112.260 Dust, Heat, and Glare Restrictions*. https://codelibrary.amlegal.com/codes/redlandsca/latest/redlands_ca/0-0-0-18535. [Accessed November 2022].
- 3 California Department of Conservation. *California Important Farmland Finder*. <https://maps.conservation.ca.gov/DLRP/CIFF/>. [Accessed November 2022].
- 4 City of Redlands. *Zoning Map (PDF)*. <https://www.cityofredlands.org/zoning>. [Accessed November 2022].
- 5 City of Redlands. *General Plan: Vital Environment Element*. <https://www.cityofredlands.org/post/planning-division-general-plan>. [Accessed November, 2022].
- 6 U.S. Fish and Wildlife Service. *National Wetlands Inventory*. <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>. [Accessed January 2023].
- 7 U.S. Fish and Wildlife Service. *National Wetlands Inventory*. <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>. [Accessed January 2023].
- 8 City of Redlands City Code. *Chapter 12.52: Trees and Tree Protection*. https://codelibrary.amlegal.com/codes/redlandsca/latest/redlands_ca/0-0-0-9277. [Accessed January 2023].
- 9 San Bernardino Valley Water Conservation District. *The Upper Santa Ana River Wash Habitat Conservation Plan*. <https://www.sbvxcd.org/santa-ana-wash-plan#:~:text=The%20Wash%20Plan%20provides%20several,will%20be%20funded%20in%20perpetuity>. [Accessed January 2023].
- 10 City of Redlands. *General Plan: Healthy Community Element*. <https://www.cityofredlands.org/post/planning-division-general-plan>. [Accessed November, 2022].
- 11 City of Redlands. *General Plan: Healthy Community Element*. <https://www.cityofredlands.org/post/planning-division-general-plan>. [Accessed November, 2022].
- 12 City of Redlands City Code. *Chapter 15.04 California Building Code*. https://codelibrary.amlegal.com/codes/redlandsca/latest/redlands_ca/0-0-0-11655. [Accessed November 2022].
- 13 City of Redlands. *General Plan: Healthy Community Element*. <https://www.cityofredlands.org/post/planning-division-general-plan>. [Accessed November, 2022].
- 14 City of Redlands. *General Plan: Healthy Community Element*. <https://www.cityofredlands.org/post/planning-division-general-plan>. [Accessed November, 2022].
- 15 City of Redlands. *General Plan: Healthy Community Element*. <https://www.cityofredlands.org/post/planning-division-general-plan>. [Accessed November, 2022].
- 16 South Coast AQMD. *Rule 403 Dust Control Information*. <https://www.aqmd.gov/home/rules-compliance/compliance/rule-403-dust-control-information>. [Accessed November 2022].
- 17 City of Redlands City Code. *Chapter 13.54.300: NPDES Program Regulatory Fees*. https://codelibrary.amlegal.com/codes/redlandsca/latest/redlands_ca/0-0-0-10951. [Accessed November 2022].
- 18 California Laws - Health and Safety Code. *Chapter 6.95. Hazardous Materials Release Response Plans and Inventory*. https://www.easylawlookup.com/California-Law/Health-and-Safety-Code/par-36866/easylookup.blp?GO=Prepare&site=easy&print=&data=health&p_start=1620&p_end=1640&p_para=36866&p_epara=37309&par=36866&displayer=YES#:~:text=The%20Legislature%20de

- [clares%20that%2C%20in,threatened%20release%20of%20hazardous%20materials](#). [Accessed December 2022].
- 19 California Environmental Protection Agency. Cortese List Data Resources. <http://www.calepa.ca.gov/sitecleanup/corteselist/> [Accessed December, 2022].
- 20 California Department of Toxic Substances Control. DTSC's Hazardous Waste and Substances Site List – Site Cleanup (Cortese List). https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,FUDS&status=ACT,BKLG.COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCE+S+SITE+LIST+%28CORTESE%29 [Accessed December, 2022].
- 21 California State Water Resources Control Board. GeoTracker. <https://calepa.ca.gov/sitecleanup/corteselist/> [Accessed December, 2022].
- 22 California State Water Resources Control Board. Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit. <https://calepa.ca.gov/sitecleanup/corteselist/>. [Accessed December, 2022].
- 23 California State Water Resources Control Board. List of Active CDO and CAO. <https://calepa.ca.gov/sitecleanup/corteselist/>. [Accessed December 2022].
- 24 California Department of Toxic Substances Control. Cortese List: Section 65962.5(a). <https://calepa.ca.gov/sitecleanup/corteselist/>. [Accessed December 2022].
- 25 City of Redlands. General Plan: *Healthy Community Element*. <https://www.cityofredlands.org/post/planning-division-general-plan>. [Accessed December, 2022].
- 26 Board of Forestry and Fire Protection. *State Responsibility Area Viewer*. <https://bof.fire.ca.gov/projects-and-programs/state-responsibility-area-viewer/>. [Accessed December 2022].
- 27 City of Redlands. General Plan: *Vital Environment Element*. <https://www.cityofredlands.org/post/planning-division-general-plan>. [Accessed January, 2023].
- 28 California Department of Water Resources. *Groundwater Live*. <https://storymaps.arcgis.com/stories/b3886b33b49c4fa8adf2ae8bdd8f16c3>. [Accessed February 2023].
- 29 City of Redlands. *Erosion Control Plan*. <https://www.cityofredlands.org/post/erosion-control-plans>. [accessed February 2023].
- 30 City of Redlands City Code. *Chapter 15.54.200: Stormwater Management and Rainwater Retention*. https://codelibrary.amlegal.com/codes/redlandscalatest/redlands_ca/0-0-0-27953. [Accessed January 2023].
- 31 Federal Emergency Management Agency. *National Flood Hazard Layer Viewer*. <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd&extent=-117.21073441077104,34.051808539287975,-117.19161562491239,34.060697252900596>. [Accessed February 2023].
- 32 California Department of Water Resources. *Dam Breach Inundation Map*. https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2. [Accessed February 2023].
- 33 City of Redlands. General Plan: *Livable Community Element*. <https://www.cityofredlands.org/post/planning-division-general-plan>. [Accessed November, 2022].
- 34 City of Redlands. General Plan: *Vital Environment Element*. <https://www.cityofredlands.org/post/planning-division-general-plan>. [Accessed November, 2022].
- 35 City of Redlands. General Plan: *Healthy Community Element*. <https://www.cityofredlands.org/post/planning-division-general-plan>. [Accessed November, 2022].
- 36 City of Redlands. General Plan: *Livable Community Element*. <https://www.cityofredlands.org/post/planning-division-general-plan>. [Accessed November, 2022].

- 37 City of Redlands. *Fire Station Locations*. <https://www.cityofredlands.org/pod/fire-station-locations-0>. [Accessed December 2022].
- 38 City of Redlands. *Development Impact Fees*. <https://www.cityofredlands.org/post/development-impact-fees>. [Accessed December 2022].
- 39 City of Redlands. *Development Impact Fees*. <https://www.cityofredlands.org/post/development-impact-fees>. [Accessed December 2022].
- 40 City of Redlands. *Development Impact Fees*. <https://www.cityofredlands.org/post/development-impact-fees>. [Accessed December 2022].
- 41 City of Redlands. *Development Impact Fees*. <https://www.cityofredlands.org/post/development-impact-fees>. [Accessed December 2022].
- 42 City of Redlands City Code. *Chapter 15.04 California Building Code*. https://codelibrary.amlegal.com/codes/redlandscal/latest/redlands_ca/0-0-0-11655. [Accessed December 2022].
- 43 City of Redlands. *Water System*. <https://www.cityofredlands.org/post/water-system>. [Accessed January 2023].
- 44 City of Redlands. *Water System*. <https://www.cityofredlands.org/post/water-system>. [Accessed January 2023].
- 45 Upper Santa Ana River Watershed. *Integrated Regional Urban Water Management Plan*. https://www.cityofredlands.org/sites/main/files/file-attachments/part_2_chapter_4_redlands_2020_uwmp.pdf?1622145365 [Accessed January 2023].
- 46 CalRecycle. *SWIS Facility / Site Activity Details*. <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1906?siteID=2688>. [Accessed February 2023].
- 47 CalRecycle. *Estimated Solid Waste Generation Rates*. <https://www2.calrecycle.ca.gov/wastecharacterization/general/rates>. [Accessed February 2023].
- 48 CAL Fire. *State Responsibility Area Viewer*. <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=468717e399fa4238ad86861638765ce1>. [Accessed November 2022].
- 49 City of Redlands. General Plan: *Healthy Community Element*. <https://www.cityofredlands.org/post/planning-division-general-plan>. [Accessed November, 2022].
- 50 CAL Fire. *Fire Hazard Severity Zone Maps*. <https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/>. [Accessed November 2022].
- 51 Federal Emergency Management Agency. *Flood Map Service Center*. <https://msc.fema.gov/portal/search?AddressQuery=Redlands#searchresultsanchor>. [Accessed November 2022].