

Mountain View Industrial Project

Initial Study – Mitigated Negative Declaration

prepared by

City of Redlands

Development Services Department, Planning Division
35 Cajon Street, Suite 20
Redlands, California 92373
Contact: Ivan Flores, Assistant Planner

prepared with the assistance of

Rincon Consultants, Inc.

1980 Orange Tree Lane, Suite 105
Redlands, California 92374

February 2021



RINCON CONSULTANTS, INC.

Environmental Scientists | Planners | Engineers

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Initial Study

1. Project Title

Mountain View Industrial Project

2. Lead Agency Name and Address

City of Redlands
Development Services Department
Planning Division
P.O. Box 3005
35 Cajon Street, Suite 20
Redlands, California 92373

3. Contact Person and Phone Number

Ivan Flores, Assistant Planner
909-798-7558

4. Project Location

The project site is a triangular-shaped parcel on the western boundary of the city of Redlands (City or Redlands), San Bernardino County, California. The 22.5-acre proposed project site (APNs 0292-032-31, 0292-032-36, 0292-032-48) is located at the northeastern corner of Mountain View Avenue and the west-bound off-ramp of Interstate 10 (I-10). The San Bernardino County Flood Control District (SBCFCD) Mission Zanja flood control channel and San Bernardino County Transportation Authority (SBCTA) railroad right-of-way (ROW) form the diagonal (northeast to southwest) border of the project site.¹

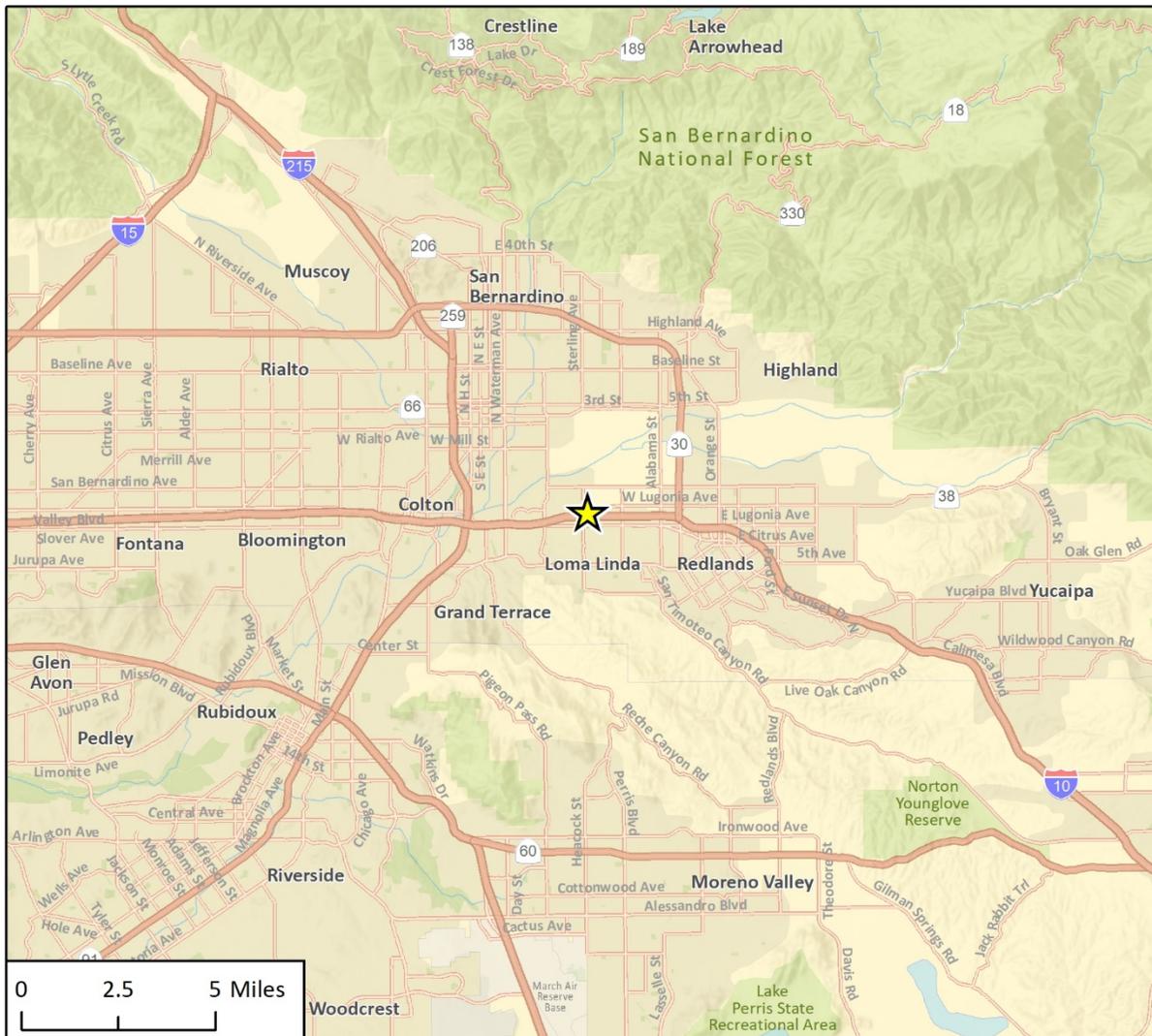
The city of Loma Linda borders the project site to the south across I-10 and the city of San Bernardino borders the project site to the west across Mountain View Avenue. Figure 1 shows the location of the site in the region, and Figure 2 shows the project site in its neighborhood context.

The project site is approximately 0.3 miles north of the Veterans Association Loma Linda Clinic, 0.9 miles south of the Santa Ana River, 1.05 miles south of the San Bernardino International Airport, 1.3 miles northeast of Loma Linda University, and 2.8 miles northwest of downtown Redlands.

Access to the project site is provided from Mountain View Avenue. Regional access to the project site would be provided via the Mountain View Avenue exit from I-10, or south from the city of San Bernardino via Mountain View Avenue.

¹ The railroad ROW is on the eastern side of the flood control channel, and will be utilized by the future Redlands Passenger Rail (Arrow) line with an estimated start in 2022.

Figure 1 Regional Location



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★ Project Location

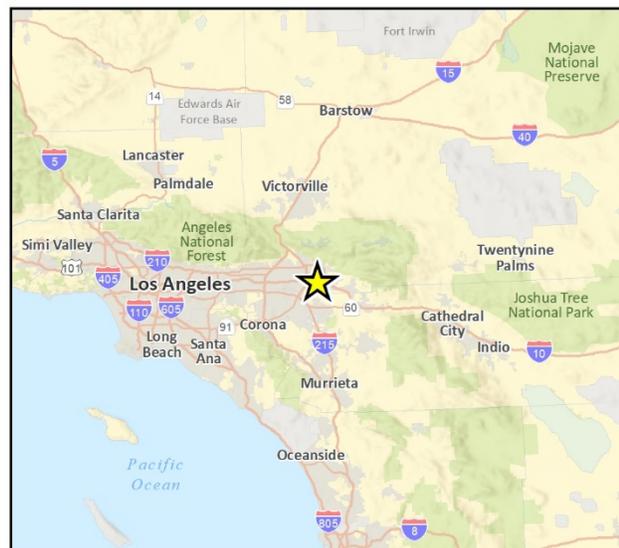


Fig 1 Regional Location

Figure 2 Project Location



5. Project Sponsor's Name and Address

Duke Realty Limited Partnership
200 Spectrum Center Drive, Suite 1600
Irvine, California 91780

6. General Plan Designation

The project site is designated Commercial/Industrial (CI) in the Redlands General Plan, entitled *General Plan 2035* (Redlands 2017a).

7. Zoning

The project site is zoned East Valley Corridor Specific Plan/Special Development District, EV/SD (Redlands 2020). The East Valley Corridor Specific Plan (Specific Plan) covers portions of the unincorporated area of San Bernardino County, and the cities of Redlands and Loma Linda. The EV/SD zoning designation is intended to provide an alternative, more flexible site planning process which encourages creative and imaginative planning of administrative professional, commercial or industrial developments, or a mixture of such uses, within the framework of a single cohesive concept plan. The Special Development District provides greater regulatory, land use, and design flexibility than conventional land use district regulations, to achieve a more economical, and efficient, use of the land (Redlands 2017b).

8. Description of Project

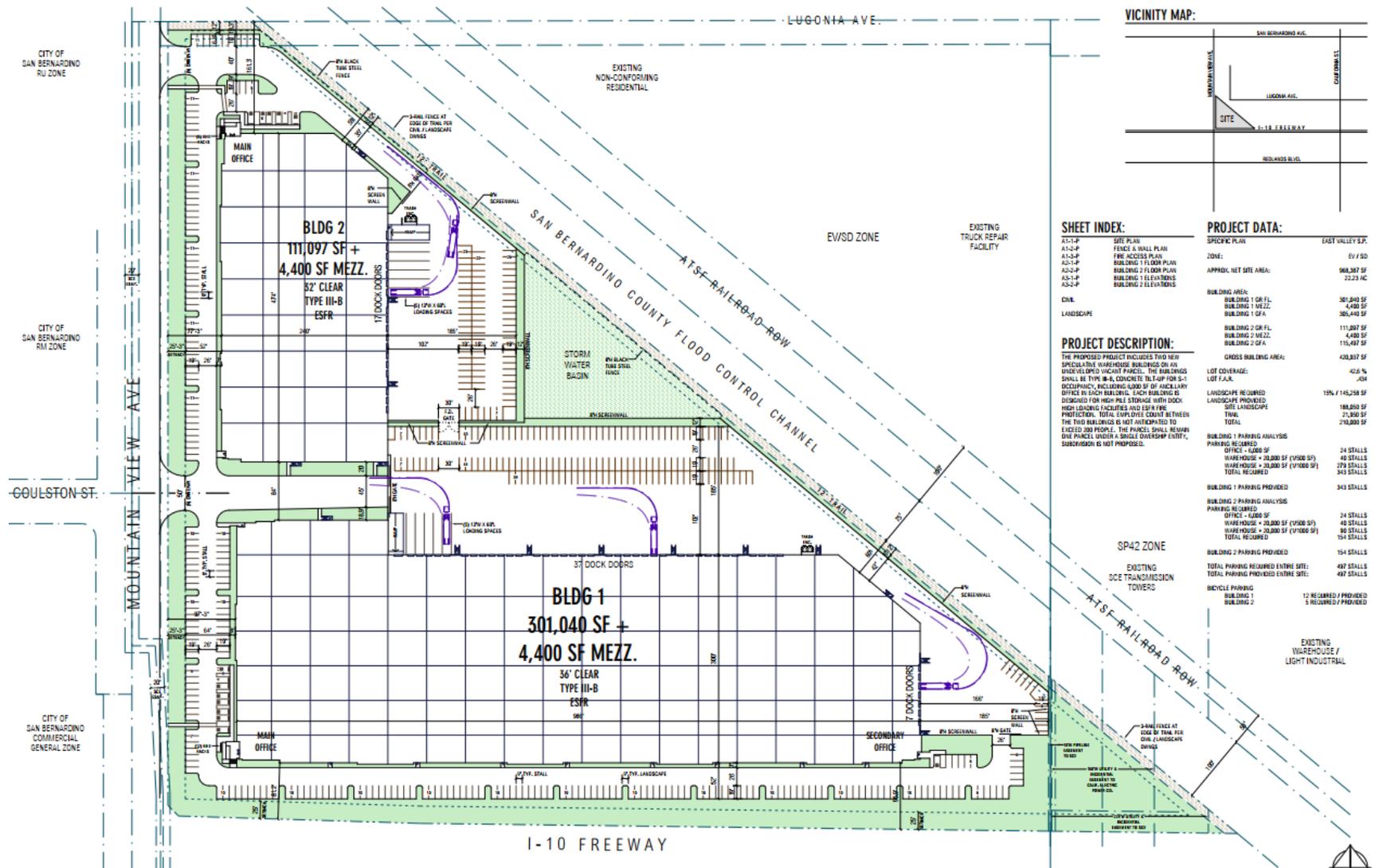
The project would construct two speculative² industrial (warehouse) buildings with office space, parking, a public trail, and associated site improvements, on a currently undeveloped 22.5-acre site. Building 1 would comprise 305,440 square feet and Building 2 would comprise 115,497 square feet of gross building area. The total gross building area would be 420,937 square feet, with a ground floor building area of 412,137 square feet. The parcel would remain under a single ownership entity; subdivision is not proposed. Lot coverage would be 42.6 percent. Figure 3 shows the site plan for the proposed project. Table 1 summarizes key project features.

The two buildings would face Mountain View Avenue and would be separated by a 50-foot-wide driveway located directly across Coulston Street, which would connect the entrance along Mountain View Avenue to a rear parking area. Building 1 would include 301,040 square feet of warehouse space and 4,400 square feet of mezzanine office space. The building would be approximately 986 feet long on its southern side parallel to the I-10 off-ramp, and approximately 352 feet long on its western side adjacent to Mountain View Avenue. The maximum roof height of Building 1 would be 41.6 feet, with a total building height of 42 feet. Building 1 would have a parapet 44 feet tall at its southern end, and another 46 feet tall at its northern end. The clear height of Building 1 would be 32 feet.³

² The buildings would not be constructed for a specific tenant.

³ Clear height is defined as the usable height to which a tenant can store its product on racking, measured below any obstructions such as joists, lights, or sprinklers.

Figure 3 Site Plan



Building 1 would provide 37 dock doors and five loading spaces on its northern side and seven dock doors on its eastern side. Building 1 would include 12 bicycle racks near the main office entrance on its southwestern corner.

Building 2 would include 111,097 square feet of warehouse space and 4,400 square feet of mezzanine office space. Building 2 would be approximately 240 feet wide on its southern side and 474 feet long on its western side adjacent to Mountain View Avenue. The maximum roof height of Building 2 would be 38 feet, with a building height of 42 feet at its western front and 40 feet at its eastern end. Building 2 would have two 44-foot-tall parapets at its northern and southern sides. The clear height of Building 2 would be 36 feet. Building 2 would provide 17 dock doors and five loading spaces on its eastern side. Building 1 would include five bicycle racks near the main office entrance on its northwestern corner.

Automatic fire sprinkler protection would be provided utilizing early suppression fast response sprinkler technology, which allows for a ceiling-only design solution (i.e., no in-rack fire sprinklers required).

Table 1 Project Summary

Building Area	
Warehouse Buildings	2
Parking	
Vehicle Stalls	495
Bicycle Racks	17
Site areas (square feet)	
Building area (ground level)	412,137
Landscape area	188,050
Trail	21,950
Parking area	48,953
Other hardscape area	297,297
Source: Duke Realty 2020 (Appendix A)	

A 12-foot-wide public access bike trail would be developed adjacent to the project site west of the Mission Zanja flood control channel, separated from the developed area by proposed fencing and a screen wall. The northern end of the trail would extend the existing Orange Blossom Trail and connect to the existing southern endpoint of the East Valley Corridor Trail and would be maintained by the Redlands Conservancy (Redlands Conservancy 2020). See below for trail information.

The project would also develop approximately 188,000 square feet of landscaped area around the two buildings, in the parking areas, and in and around a stormwater basin that would be developed on the eastern area of the project site.

Lot coverage would be 42.4 percent of the project site. The exterior parking areas on the western and southern side of the project site would be set back at least 25 feet from Mountain View Avenue and the I-10 off-ramp.

A triangular-shaped area at the southeastern corner of the project site would provide a pipeline easement, utility and incidental easements for Southern California Edison (SCE), and California Electric Power Company. No trees would be planted in these easement areas.

Covered trash enclosures would be provided at the northeastern side of both buildings.

Access, Circulation, and Parking

Vehicle access to the project would be provided by a 50-foot-wide ingress/egress main driveway on Mountain View Avenue opposite E. Coulston Street and a 40-foot-wide second driveway from Mountain View Avenue on the northern end of the project site.

The project proposes four, eight-foot-tall, vehicle access gates in the following locations:

- At the main Mountain View Avenue entrance between the two buildings, separating the driveway from the interior parking lot
- At the northern entrance to the interior parking lot for Building 2
- At the southern entrance to the interior parking lot for Building 2
- At the southeastern side of the interior parking lot for Building 1

Three rolling steel gates would be made of black tube-steel framed with vertical pickets between 8-foot-high concrete screen walls. The security gate at the southern entrance to the interior parking lot for Building 2 would be a double-swinging gate that would open from the center to the south.

Delivery areas and ramps would be located at the northern side of the Building 1 and the eastern side of Building 2. The delivery area would not be visible from Mountain View Avenue or I-10. Secondary gate access would be provided for the delivery area-dock doors and interior parking lot on the eastern side of Building 2.

The project would provide space for 497 parking stalls: 343 stalls for Building 1 and 154 stalls for Building 2. Americans with Disability Act (ADA)-accessible parking would be provided near the proposed office space on the southwestern side of Building 1 and northern side of Building 2.

Pedestrian access would be provided by two pedestrian pathways at the northern and southern end of the project site that would extend from Mountain View Avenue to the entrance of Building 1 and Building 2 main offices.

Emergency Access

Emergency access would be provided via the two driveways on Mountain View Avenue and a fire lane that would encircle both buildings with a 20-foot-wide minimum width, as shown in the site plan located in Appendix A. Three of the gates would have a Knox key box, in accordance with Redlands Fire Department *Fire Protection Guidelines*. As all gates would be installed across a fire apparatus access road, their final design and means of emergency operation would require approval by the Redlands Fire Chief, in accordance with the 2016 California Fire Code.

Proposed Architectural Design

The architectural design of the rectangular warehouse buildings would incorporate a variety of modern façades, offsets, and materials to provide both vertical and horizontal differentiation and visual interest. The paint scheme would consist of white as the primary color, light and medium gray accent colors for larger wall expanses, and a deep blue gray accent color, with a mix of horizontal

and vertical design elements. Building materials would consist primarily of poured concrete walls, with metal roll up doors and solarized window panels set in anodized aluminum frames. Each building would include 6,000 square feet of ancillary space and would be designed for high-pile storage with dock loading facilities. Figure 4 shows the color elevation scheme for Building 1.

Utilities

Utilities to be installed include sewer, potable and fire service water lines, a storm drain system, and gas, electrical, and telephone/internet service. Connections for electricity, gas, and telephone service would be made at existing supply lines, junction boxes, and/or control panels adjacent to the project site along Mountain View Avenue. The buildings would be equipped with solar-ready conduits for future photovoltaic panels. A proposed water line and sewer line would extend from the main lines from Mountain View Avenue down the length of Building 1. Another proposed water line and sewer line would extend into Building 2 from Mountain View Avenue (see Appendix A for utilities plan).

Drainage Design

New drainage features would be constructed on-site to minimize potential flooding and treat all stormwater prior to discharge. Compliance with the Redlands Municipal Code and the Redlands MS4 permit requires capture and treatment of the 85th percentile, 24-hour storm event.

Inlets and sub-surface storm drainpipes would be constructed to collect and convey runoff generated by the project site to an infiltration basin for water quality treatment. Stormflows would be managed throughout the project site, with roof drain downspouts, and four underground storm drain lines, that would convey runoff to the water quality basin on the northeastern portion of the project site. After the stormwater has been treated in the water quality basin, excess runoff would outlet into the Mission Zanja flood control channel.

As part of the project's final design review, the project applicant would be required to submit a Standard Urban Stormwater Mitigation Plan (SUSMP) demonstrating adequate stormwater retention.

Mountain View Avenue Improvements

The project would develop Mountain View Avenue along the project frontage including half-width improvements consistent with the East Valley Corridor Specific Plan, and would include a northbound through lane, and a north to westbound turning lane at Coulston Street. Furthermore, a traffic signal is required at the intersection of Coulston Street and Mountain View Avenue⁴. The project frontage would also feature curb and sidewalk adjacent to the road. A landscaped area including a vegetated berm featuring groundcover, trees and a continuous screen shrub would be provided between the sidewalk and parking areas. The existing utility poles along Mountain View Avenue would remain.

Proposed Walls and Fencing

As shown in Figure 3, an eight-foot-high concrete screen wall would surround the interior parking lot and delivery area. The wall would be painted with accent reveals to match the building color scheme. Eight-foot-high black tube steel fencing would separate the public trail and warehouse

⁴ Identified in the Traffic Impact Analysis (Albert A. Webb Associates 2020c) consistent with City of Redlands Measure U requirements.

Figure 4 Building 1 Schematic Elevations



Source: Duke Realty 2020

development area not already separated by the screen wall (along the northern section of the trail and the eastern side of the storm water basin).

White polyvinyl chloride (PVC) fencing is proposed on the eastern side of the public trail.

An existing California Department of Transportation (Caltrans) fence runs along the southern boundary of the project site which would remain in place.

Proposed Landscaping and Irrigation

Landscaping would be provided around the building areas that can be seen from public view (mainly the western, northern, and southern sides), between parking areas, along Mountain View Avenue, and adjacent to the I-10 off-ramp. In addition, the project would develop a 18,360 square-foot triangular-shaped storm water detention basin by the rear parking lot on the eastern side of the project site, which would be surrounded by a screen wall. Figure 5 shows the conceptual landscape plan for the project.

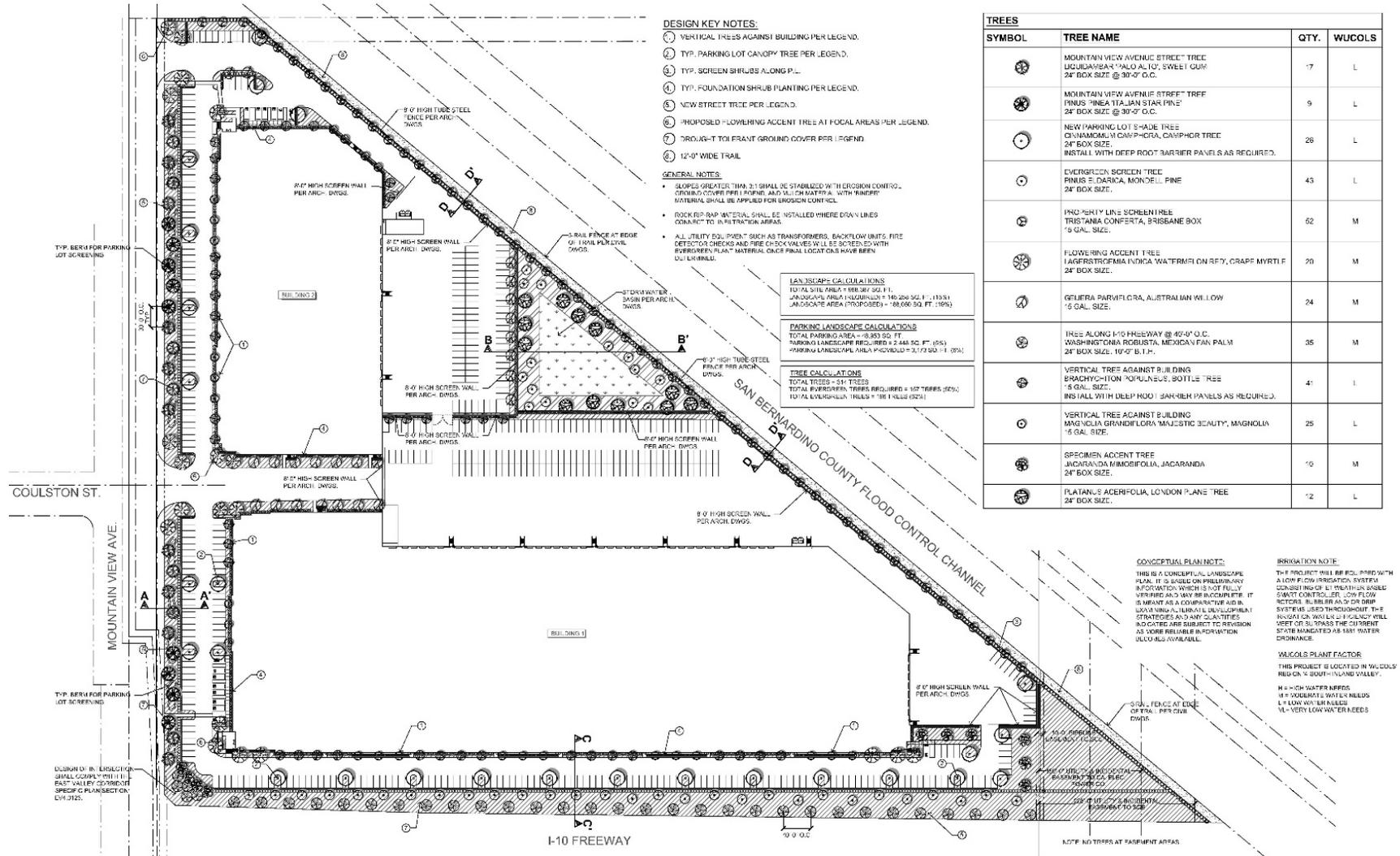
The project would plant an estimated 314 trees, including 196 evergreen trees, dispersed in the landscaped areas in the project site. The landscape plan includes 12 varieties of trees in landscaped areas along Mountain View Avenue, along the main driveway, north of the I-10 off-ramp, and in parking areas. Accent trees would be planted at the intersection of Mountain View Avenue and the I-10 off-ramp. The design of the Mountain View Avenue/I-10 off-ramp intersection would comply with the East Valley Corridor Specific Plan guidelines.

The project proposes 6,267 square feet of landscape in parking areas. Camphor trees are proposed for the parking areas between stalls in the parking areas on the western side of the buildings and the southern side of Building 1. The project would also plant a continuous line of shrubs along parking edges adjacent to Mountain View Avenue with a layered drought-tolerant ground cover and shrub masses in planting areas. Landscaping along Mountain View Avenue would include trees, two varieties of shrubs, and groundcover.

Brisbane box trees are proposed along the fence that separates the warehouse development and the trail. The stormwater basin would contain hydroseed mix and trees on the slopes inside the screen wall, and on the other side of the screen wall by the parking area for Building 2. The slopes of the depressed stormwater basin would contain varieties of drought tolerant groundcover.

The proposed landscape and irrigation would employ strategies to maximize water storage and conservation and minimize runoff, promote infiltration, and protect slopes from erosion. Such strategies include extensive mulching, low water use shrubs, and grouping of plants with similar water requirements. The landscaped areas would be equipped with a low-flow irrigation system with an evapotranspiration weather-based smart controller, low-flow rotors, bubbler and/or drip systems that would meet or surpass the State's Assembly Bill (AB) 1881 water ordinance. Slopes greater than 2:1 horizontal: vertical would be stabilized with erosion control ground cover and mulch material with "binder" material. Rock rip-rap materials would be installed where drain lines connect to infiltration areas. All utility equipment such as transformers, backflow units, fire detector checks and fire check valves, would be screened with evergreen plant material once final locations have been determined.

Figure 5 Conceptual Landscape Plan



Proposed Trail

The Orange Blossom Trail Master Plan was completed in 2008. Sections of the trail have been completed between Bryn Mawr Avenue and Texas Street and between Grove Street and Wabash Avenue. When complete, it will be a 7.5-mile trail that runs east to west across Redlands (Redlands 2017a). The Orange Blossom Trail Master Plan states that an existing maintenance road on the south bank of the channel provides adequate width and a graded surface for development of a multi-use trail (Redlands 2008).

The project would construct a segment of the Orange Blossom Trail adjacent to the project, as identified in the Redlands General Plan. A 12-foot-wide, asphalt concrete, public use bike trail would be developed adjacent to the flood control channel on the diagonal northeastern boundary of the project site, and be consistent with the approved Orange Blossom Trail plans. The trail segment would extend from Mountain View Avenue southeast, along the western bank of the Mission Zanja flood channel and terminating at the southeast corner of the project site. The warehouse buildings would be set back 35 and 42 feet respectively, from the trail's western edge.

These plans include a two percent graded slope with a compacted subgrade, white PVC three-rail fence installation, and landscaping on both sides of the trail. According to the project landscape plan (Appendix A), the western edge of the trail would be lined with Brisbane box trees, continuous shrub hedge, and a mow curb. The eastern side of the trail would have a mow curb and the three-rail fence. The existing dirt path and flood channel would be east of the three-rail fence.

Project Construction

Project construction would occur over approximately 10 months, with construction anticipated to begin in summer or fall of 2021, and be completed by summer 2022. Construction would involve grading and excavation for the building foundations, building construction, architectural coating, and paving activities. Based on preliminary earthwork estimates, project grading would require approximately 112,800 cubic yards (cy) of cut, and 132,700 cy of fill, the difference of which (19,900 cy) would be lost to shrinkage. No excess soil would need to be disposed of off-site.

Required Approvals

The project would require the approval of a Planned Development.

9. Surrounding Land Uses and Setting

The project site is located in the western portion of the city of Redlands, in the East Valley Corridor Specific Plan Area. Surrounding uses include the adjacent Mission Zanja flood channel and SBCTA Railroad ROW to the north and east along the northeast project boundary; light industrial and warehouse facilities to the north; Mountain View Avenue, a gas station, commercial businesses, Victoria Seventh Day Adventist Church, and Totally Kids Rehabilitation Hospital to the west; single-family residences and vacant land to the east; and the adjacent I-10 off-ramp to the south.

The project site is generally flat and vacant with ruderal areas, scattered trees—mainly at the southern end near the I-10 off-ramp, and concrete foundation remnants along its western edge. There is no sidewalk on the eastern side of Mountain View Avenue, which features SCE transmission poles. One utility pole is located approximately 200 feet into the pathway from Mountain View Avenue, connecting the power lines from Mountain View Avenue over the channel to West Lugonia Avenue.

The open flood channel has an approximately 25-foot-wide earthen bottom and sides made of decomposing gunite with boulders or riprap. Within its banks, the channel varies from approximately 75 to 100 feet wide. An earthen pathway approximately 35 feet wide is adjacent to the channel's southern side.

Both the channel and pathway are accessible from their intersection with Mountain View Avenue on the northern side of the project site. The channel continues under Mountain View Avenue. There is a low metal pipe fence bordering Mountain View Avenue where it crosses over the channel. The pathway continues on the western side of Mountain View Avenue; there is no crosswalk to connect the pathway segments. The SBCTA railroad ROW varies from 50 to 100 feet wide, with a railroad crossing signal on the northbound and southbound lanes on Mountain View Avenue.

Coulston Avenue eastward terminates at Mountain View Avenue across from the project site. Mountain View Avenue has one northbound lane adjacent to the project site, a median turning lane, and one southbound lane that divides into two lanes approximately 240 feet south of the Mission Zanja flood channel. There is a traffic signal at the intersection of Mountain View Avenue and the I-10 westbound on- and off-ramps.

Figure 2 shows the project site and surrounding land uses.

10. Other Public Agencies Whose Approval is Required

The Federal Aviation Administration issued a No Hazard to Air Navigation letter on July 20, 2020 indicating there were no restrictions or conditions pertaining to the project (FAA 2020).

11. Have California Native American Tribes Traditionally and Culturally Affiliated with the Project Area Requested Consultation Pursuant to Public Resources Code Section 21080.3.1?

Pursuant to Assembly Bill 52 (AB 52), the City of Redlands mailed consultation letters to the five Native American Tribes on its AB 52 contact list notifying them regarding the project and the provisions of AB 52. Redlands received a request for consultation from the San Manuel Band of Mission Indians and Soboba Band of Mission Indians. Redlands staff met with Tribal representatives in April and October 2020, and developed Tribal Cultural Resources (TCR) mitigation in conjunction with consultation. See Section 18, *Tribal Cultural Resources* for additional discussion.

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Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is “Potentially Significant” or “Less than Significant with Mitigation Incorporated” as indicated by the checklist on the following pages.

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

Determination

Based on this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.



Signature

Brian Foote, AICP

Printed Name

February 10, 2021

Date

City Planner/Planning Manager

Title

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Environmental Checklist

1 Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--	--------------------------------	--	------------------------------	-----------

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

a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Information in this section is based on the *Aesthetics Evaluation Report* prepared by Rincon Consultants (2020a), and provided in Appendix B.

a. Would the project have a substantial adverse effect on a scenic vista?

Scenic vistas can be impacted by development through the construction of a structure that blocks the view of a vista, or through development that alters a scenic resource. Looking north and north east, across the site, the San Bernardino Mountains are visible in the background and form a prominent, distinctive feature that visually orients residents and visitors to the regional setting. From Mountain View Avenue looking east, light industrial development is visible along the near horizon, and the mountain ridgelines can be seen beyond. With elevations up to 11,000 feet, this rugged mountain range frames much of San Bernardino County, including Redlands along the northern and eastern horizons. Existing development intervenes in the middle ground and background, but the height and majesty of the ridgelines rise high above and remain visible. Industrial features, such as above-ground wooden and 220 kilovolt (kV) transmission lines, clutter the line of sight across the project site, interfering with the unity and vividness of the visual

Mountain View Industrial Project

experience of the mountains from Mountain View Avenue. Even with the visual clutter, however, the mountainous backdrop retains a strong presence to which all viewers would have a high to moderately high degree of sensitivity. Figure 6 shows the existing project site.

I-10 has an elevated alignment where it parallels the project site's southern boundary, rising from an above-ground alignment with a berm to an overpass where it crosses Mountain View Avenue. From this alignment, Building 1 would intervene with the view from the highway toward the northern and northwestern mountains. As evident in the diagram in Figure 7, the top of the building would be higher than the line of sight from the highway.

While the view from I-10 across the project site includes the nearby mountains and could be considered moderately high in visual quality, the foreground view across the project site from the highway is not particularly notable and includes unmaintained, ruderal vegetation with ununified views of other industrial development, including the highly visible 200 kV lines east of the project site. The project would introduce an industrial campus with buildings designed to the expected standards for concrete, tilt-up construction but with features that break up the unilinear horizontality of the wall surface (see Project Characteristics, above). Furthermore, all rooftop mechanical equipment would be screened using materials that match the color palette and surface finishes of the rest of the building. While the project would be close to the highway, and thus be highly visible to west-bound travelers, these travelers would not be expected to have a high degree of sensitivity as they would consist largely of commuters who travel the corridor for work or to reach a vacation destination, including the downtown area of Redlands.

With the tallest buildings at 44 feet tall, the project buildings would not entirely obscure views of the mountains in the near distance. Even though the building would become another component in the landscape intervening between viewers passing on I-10 and the north and northeast mountains, it would not be tall enough to entirely obscure views of the mountains. Furthermore, the views are notable but not to the degree to merit regulatory protection. Thus, the impact would be less than significant for scenic views and vistas.

LESS THAN SIGNIFICANT IMPACT

- b. Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

The project site is not located in or adjacent to a designated state scenic highway, as identified by Caltrans (2020). Therefore, no impact associated with a state scenic highway would occur.

NO IMPACT

Figure 6 Project Site Photographs



A. I-10, visible above-grade from the project site, looking south.
Source: Rincon Consultants, Inc. 2020



B. San Bernardino Mountains, visible across the project site, to the north and east.
Source: Rincon Consultants, Inc. 2020



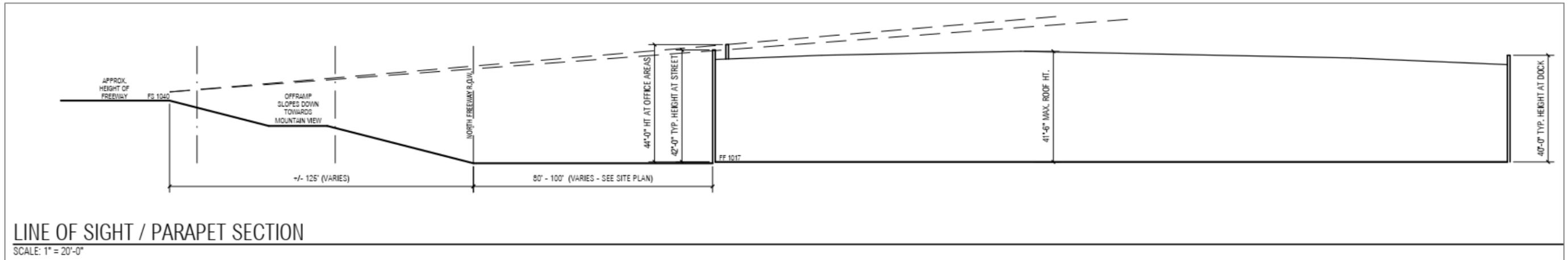
C. San Bernardino Mountains, looking east across the project site.
Source: Google Earth 2020



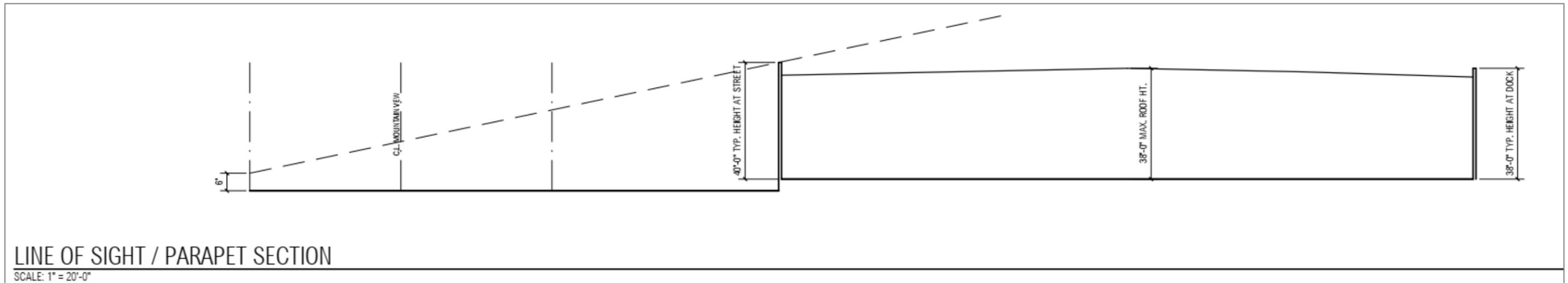
D. San Bernardino Mountains, looking east across the project site.
Source: Rincon Consultants, Inc. 2020

Figure 7 Line of Sight Diagrams

From Interstate 10



From west Mountain View Avenue



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- c. *Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

Along Mountain View Avenue, existing development on the west side of the roadway varies in visual quality and design and looking east, the views of the mountains are degraded by the unmaintained, ruderal vegetation, industrial transmission lines, and other industrial and residential development.

The project components would largely obscure view of the mountains but would add to the build-out envisioned by the East Corridor Specific Plan and introduce regularly maintained, multi-storied, dense urban forestation in the form of landscaping on all sides of the site. While the views would change, the quality of those views would be consistent with the spirit of the Specific Plan and would remain moderately high.

Generally, visual quality in the project vicinity is moderately low to moderate as development is unremarkable and vacant lots are unmaintained and feature no notable landscaping. The freeway, transmission lines, and other development create a strong contrast with the background mountainsides. Travelers on Mountain View Avenue would have low to moderately low viewer sensitivity as the development north of the project site is orderly but not notable. Travelers on I-10 would have the same sensitivity, as described above, because they would largely be commuters with a low expectation for high quality views. Nonetheless, the City's General Plan and the areawide specific plan intend that visual quality be enhanced by new development.

The project would introduce new development in the form of two-story, rectangular, industrial buildings, parking lot, and fences, surrounded with generous landscaping. The development would intervene between the nearby foothills and mountainsides and would become a prominent feature in a currently undeveloped area. The project includes design provisions that break up horizontal massing with varied roof heights, fenestration, and the introduction of color block elements in otherwise undifferentiated expanses of wall. The color palette would be in keeping with nearby, similar uses. Finally, the landscape plan would introduce a dense, multi-storied on-site urban forest that would both break up the uniformity of the buildings by adding texture and color and improve the visual quality of the area immediately around the site as it currently exists.

As the project design would be within the requirements of the Specific Plan for industrial development and would include varied massing and landscaping that continues to enhance the unified streetscape with palm, liquid amber, magnolia, and other species that occur throughout the area, the impacts to visual quality and community character would be beneficial and less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?*

The proposed project would introduce new sources of light and glare on the currently undeveloped project site. This would include light from building safety fixtures, parking lot lights, and pedestrian walkway lighting. New sources of glare would be generated by cars parked in the perimeter stalls around the front and sides of the building and those in the back area, behind the gated fences. Trucks and cars entering and exiting the project site during the day could generate temporary glare

Mountain View Industrial Project

as they wait to enter traffic lanes on Mountain View Avenue. Vehicles could also generate glare at night when headlights are shining as they travel on perimeter roads and onto Mountain View Avenue from the parking areas and loading dock areas. Finally, east-facing windows could generate significant glare on a sunny day, particularly in mid-summer. This includes from windows along the east sides of both buildings.

A lighting plan will be submitted as part of the planning review process, and will include review for compliance with the Redlands Municipal Code ordinances that govern safety and parking lights. The height of parking lot light poles would also fall under this design review process. Therefore, upon submittal of a lighting plan that complies with these regulations, impacts from lighting would be less than significant and in keeping with the level of light anticipated by the East Corridor Specific Plan.

The density of the landscape plan would reduce much of the parking and circulation glare. As the landscape plan includes numerous varieties of trees that have large, spreading canopies, upon maturity these trees would mitigate glare impacts. Glare generated by vehicles entering and exiting the project site would be temporary and would cease when the vehicle moves into traffic. All fenestration is screened by trees planted close to the buildings and the large bank of windows on the southern elevation would not be subject to direct sun. These design features would reduce glare impacts to less than significant.

LESS THAN SIGNIFICANT IMPACT

2 Agriculture and Forestry Resources

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

a. *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

The project site is in an area of Redlands that is zoned East Valley Corridor Specific Plan/Special Development District, which does permit agricultural use. However, the project site does not currently have any agricultural use or activity. The project site and immediate surrounding areas are not designated Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance, according to the 2016 San Bernardino County Important Farmland Map provided by the Farmland Mapping and Monitoring Program (California Department of Conservation [DOC] 2016). The nearest agricultural land, designated Prime Farmland, is approximately one mile west of the project site, on West Lugonia Avenue, between California Street

Mountain View Industrial Project

and Nevada Street; this land is not currently used for agricultural purposes. The majority of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance is located in the southeastern area of Redlands, with smaller areas located in the northeastern, northern-central, and southern areas of Redlands, and within San Timoteo Canyon (Redlands 2017a). The project site is at the western boundary of Redlands, where there are few areas of agricultural land. No impact would occur.

NO IMPACT

- b. *Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?*

The project site is in an area of Redlands that is zoned East Valley Corridor Specific Plan/Special Development District, which does permit agricultural use. However, the project site does not currently have any agricultural use or activity, and is not designated Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance. The project would not be located in an area with a Williamson Act contract (DOC 2016). No impact would occur.

NO IMPACT

- c. *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?*

- d. *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

The project site is in an urbanized area of Redlands (Redlands 2019a). Neither the project site nor surrounding parcels are zoned for forest land, timberland, or timberland production. It would not result in the loss of forest land or conversion of forest land to non-forest land. No impact would occur.

NO IMPACT

- e. *Would the project 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?*

The project site is in an urbanized area of Redlands that is not currently used for agriculture or forest land (Redlands 2019a). It would not result in the loss of forest land or farmland, or conversion of forest land or farmland, to non-forest land or non-farmland. No impact would occur.

NO IMPACT

3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

This analysis is based on data and information in the following project-specific reports: *Air Quality/Greenhouse Gas Analysis for the Duke Warehouse at Mountain View Avenue, Planned Development No. 4* (Albert A. Webb Associates 2020a; Appendix C), *Health Risk Assessment for the Duke Warehouse at Mountain View Avenue, Planned Development No. 4* (Albert A. Webb Associates 2020b; Appendix C), and *The Mountain View Warehouse Project Traffic Impact Analysis* (Albert A. Webb Associates 2020c; Appendix C).

Air Quality Standards and Attainment

The project site is located in the South Coast Air Basin (SCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAB includes Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Geronio Pass area in Riverside County. The regional climate in the SCAB is semi-arid, and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity.

Air pollutant emissions in the SCAB are generated by both stationary, and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and include such sources as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products. Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, and self-propelled construction

equipment. Air pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles.

The Clean Air Act (CAA) is the comprehensive federal law that regulates air emissions from stationary and mobile sources. Among other things, this law authorizes the U.S. Environmental Protection Agency (USEPA) to establish National Ambient Air Quality Standards (NAAQS) to protect public health and public welfare and to regulate emissions of hazardous air pollutants (USPA 2020). Under the federal CAA, the USEPA establishes health-based air quality standards that all states must achieve. The California CAA also establishes requirements for cities and counties to meet. SCAQMD was created by the state legislature to facilitate compliance with the federal CAA and to implement the state air quality program (SCAQMD 2019).

As the local air quality management agency, the SCAQMD is required to monitor air pollutant levels to meet state and federal air quality standards and, if they are not met, to develop strategies to meet the standards. If the SCAQMD standards for pollutant levels are met or exceeded, the SCAB is classified as being in “attainment” of those levels. If the standards for pollutant levels are not met, the SCAB is classified as being in “nonattainment.” At the time of designation, if the available data does not support a designation of attainment or nonattainment, the area is designated as “unclassifiable.”

The SCAB is in attainment of the 1-hour and 8-hour ozone NAAQS as well as the latest 24-hour and annual $PM_{2.5}$ standards. The 1-hour ozone standard is measured by the average number of days per year with maximum hourly concentrations of pollutants during the most recent three-year period. The 8-hour ozone standard is measured by the 3-year average of the fourth highest daily concentrations (SCAQMD 2019).

Ambient air monitoring stations throughout the country measure air concentrations of particulate matter (PM), with most monitoring for two size ranges: “fine particles” with aerodynamic diameters less than or equal to 2.5 microns (μm) ($PM_{2.5}$) and suspended PM_{10} microns or less (PM_{10}). PM_{10} includes both fine particles ($PM_{2.5}$) and “coarse particles,” with aerodynamic diameters greater than 2.5 μm and less than or equal to 10 μm . The chemical makeup of particles varies across the U.S. For example, fine particles in the eastern half of the U.S. contain more sulfates than those in the West, while fine particles in southern California contain more nitrates than those in other areas of the U.S. (USEPA 2009).

The SCAB is a non-attainment area for the federal standards for ozone and suspended particulate matter $PM_{2.5}$ as well as the state standards for ozone, PM_{10} , and $PM_{2.5}$. Areas of the SCAB located in Los Angeles County are also in nonattainment for lead. The SCAB is designated “unclassifiable” or in attainment for all other federal and state standards. Characteristics of ozone and PM are described in Table 2. Suspended PM is particularly associated with risks to the health of infants and children (USEPA 2004).

Table 2 Health Effects Associated with Non-Attainment Criteria Pollutants

Pollutant	Adverse Effects
Ozone	(1) Short-term exposures: (a) pulmonary function decrements and localized lung edema in humans and animals and (b) risk to public health implied by alterations in pulmonary morphology and host defense in animals; (2) long-term exposures: risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (3) vegetation damage; and (4) property damage.
Suspended particulate matter (PM ₁₀)	(1) Excess deaths from short-term and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease (including asthma). ^a
Suspended particulate matter (PM _{2.5})	(1) Excess deaths from short- and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes, including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children, such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease, including asthma.

Source: USEPA 2018a and USEPA 2004

Air Quality Management

Under state law, air districts are required to prepare a plan for air quality improvement to address pollutants for which the district is in nonattainment status. The Final 2016 Air Quality Management Plan (AQMP) was adopted on March 3, 2017 and includes the integrated strategies and measures needed to meet the NAAQS. It incorporates new scientific data and notable regulatory actions that have occurred since adoption of the previous AQMP in 2012, including the approval of a new federal 8-hour ozone standard of 0.070 ppm that was finalized in 2015. The Final 2016 AQMP addresses state and federal planning requirements and incorporates new scientific information, primarily in the form of updated emissions inventories, ambient measurements, and meteorological air quality models. In addition, the 2016 AQMP incorporates the Southern California Association of Government’s (SCAG) projections for socio-economic data (e.g., population, housing, employment by industry) and transportation activities from the 2016 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). The Final 2016 AQMP builds upon the approaches taken in the 2012 AQMP for the attainment of federal PM and ozone standards and addresses the reductions that must be achieved for attainment status. In addition, the AQMP provides strategies and measures to reach attainment with the thresholds for 8-hour and 1-hour ozone and PM_{2.5} (AQMP 2017).

Air Emission Thresholds

Emissions for construction and operation of the project were estimated using the California Emissions Estimator Model Version 2016.3.2 (CalEEMod). The analysis reflects the construction and operation of the project as described in the Project Description. CalEEMod defaults for construction duration were adjusted to match the project’s estimated construction schedule of 11 months. CalEEMod defaults for construction equipment were used. Specific model inputs and methodology are provided in Appendix C.

It was assumed the proposed project would comply with applicable regulatory standards, including SCAQMD Rule 403 (Fugitive Dust), which requires twice daily watering, a 12 percent unpaved road moisture content, and a speed limit of 15 miles per hour (mph) on unpaved roads.

Criteria Pollutant Emission Thresholds

The SCAQMD recommends quantitative regional significance thresholds for temporary construction activities and long-term project operation in the SCAB, shown in Table 3.

Table 3 SCAQMD Regional Significance Thresholds

Construction Thresholds	Operational Thresholds
75 pounds per day of VOC	55 pounds per day of VOC
100 pounds per day of NO _x	55 pounds per day of NO _x
550 pounds per day of CO	550 pounds per day of CO
150 pounds per day of SO _x	150 pounds per day of SO _x
150 pounds per day of PM ₁₀	150 pounds per day of PM ₁₀
55 pounds per day of PM _{2.5}	55 pounds per day of PM _{2.5}

VOC=volatile organic compounds, NO_x= nitrogen oxide, CO= carbon monoxide, Sox=sulphur oxides, PM10=particulate matter 10 microns or less, PM2.5 =particulate matter 2.5 microns or less
 Source: SCAQMD 2015

Localized Significance Thresholds

In addition to the above regional thresholds, the SCAQMD has developed Localized Significance Thresholds (LSTs) in response to the Governing Board’s Environmental Justice Enhancement Initiative (1-4), which was prepared to update the *CEQA Air Quality Handbook* (1993). LSTs were devised in response to concern regarding exposure of individuals to criteria pollutants in local communities and have been developed for NO_x, CO, PM₁₀, and PM_{2.5}. LSTs represent the maximum emissions from a project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each source receptor area (SRA), distance to the sensitive receptor, and project size. LSTs have been developed for emissions from construction areas up to five acres in size. However, LSTs only apply to emissions from fixed stationary locations and are not applicable to mobile sources, such as cars on a roadway (SCAQMD 2008). As such, LSTs are typically applied only to construction emissions because the majority of operational emissions are associated with project-generated vehicle trips.

LSTs have been developed for emissions from construction areas up to five acres in size. The SCAQMD provides lookup tables for project sites that measure one, two, or five acres. The project site encompasses approximately 22.5 acres; therefore, this analysis uses a regression calculator to determine an applicable LST based on the project site area and the LST lookup values for two- and five-acre construction sites.

The LST thresholds are estimated using the maximum daily disturbed area (in acres) and the distance of the project to the nearest sensitive receptors (in feet). The closest sensitive receptors to the project site are the existing Seventh-day Adventist church and Totally Kids Rehabilitation Hospital on the west side of Mountain View Avenue, approximately 100 feet west of the project site. According to the SCAQMD’s publication, *Final LST Methodology* (SCAQMD 2008), projects with boundaries closer than 85 feet to the nearest receptor should use the LSTs for receptors located at

85 feet. Therefore, a receptor distance of 25 meters (85 feet) was used to provide a conservative analysis.

The project is also located in SRA 34 (Central San Bernardino Valley). LSTs for construction in SRA-34 on a four-acre site with a receptor 85 feet away are shown in Table 4.

Table 4 SCAQMD LSTs for Construction (SRA 10)

Pollutant	Allowable Emissions for a 5-acre Site in SRA 34 for a Receptor 85 Feet Away (lbs/day)
Gradual conversion of NO _x to NO ₂	237
CO	1,488
PM ₁₀	12
PM _{2.5}	7

Source: Albert A. Webb Associates 2020a (Appendix C)

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

A project may be inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding the forecasts used in the development of the AQMP. The 2016 AQMP relies on local general plans and the SCAG 2016 RTP/SCS forecasts of regional population, housing, and employment growth in its own projections for managing air quality in the Basin.

The growth projections used by the SCAQMD to develop the AQMP emissions budgets are based on the population, vehicle trends, and land use plans developed in general plans and used by SCAG in the development of the 2016 RTP/SCS. As such, projects that are consistent with the growth anticipated by SCAG’s growth projections and a jurisdiction’s General Plan would not conflict with the AQMP. If a project is less dense than anticipated by the growth projections, the project would likewise be consistent with the AQMP.

The growth forecasts in SCAG’s 2016 RTP/SCS projects that the population of Redlands would increase from 69,600 in 2012, to 85,500 in 2040 (SCAG 2016). As discussed in Section 14, *Population and Housing*, the project would generate temporary construction and long-term operational employment through the construction of two warehouse buildings. The project would not construct any new housing, extension of roads, or major infrastructure. As the proposed warehouse buildings are not developed for a specific client, the exact number of employees for this project is unknown at this time. Light Industrial (LI) uses are estimated to employ up to one worker for every 1,030 square feet of building area (Riverside County 2015). Based on this employment generation rate, the project is expected to create approximately 409 new recurring jobs in the region. Employees are expected to predominantly be drawn from the existing workforce in the surrounding region. Conservatively assuming that all 409 employees would be new Redlands residents, the project would not cause Redlands to exceed populations projections used in the 2016 AQMP.

As shown in Table 5 and Table 6 under Checklist Item b, the project would not generate criteria pollutant emissions in excess of SCAQMD thresholds for ozone precursors (ROG and NO_x) or PM_{2.5}. The project would be consistent with the AQMP and would not conflict with or obstruct the applicable air quality plan. The proposed project’s construction and operation would not exceed

criteria pollutant thresholds established by SCAQMD on a localized level; therefore, the impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. *Would the project 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?*

Construction

Table 5 summarizes the estimated maximum daily emissions (lbs) of pollutants associated with construction of the project. As shown below, NO_x, CO, SO₂, PM₁₀, and PM_{2.5} emissions would not exceed SCAQMD regional thresholds or LSTs. However, ROG emissions would exceed SCAQMD regional thresholds by 118 lbs per day. Mitigation measure AQ-1 is recommended to reduce significant ROG emissions.

Table 5 Project Construction Emissions – Maximum Emissions (lbs/day)

Description	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Construction Year 2020	7.38	60.42	58.62	0.15	8.36	3.93
Construction Year 2021	6.68	54.95	56.09	0.15	7.96	3.56
Maximum Emissions	193.37	66.00	72.48	0.18	9.70	4.43
SCAQMD Regional Thresholds	75	100	550	150	150	55
Threshold Exceeded?	Yes	No	No	No	No	No
Maximum On-site Emissions	N/A	50.20	47.51	N/A	5.56	3.40
SCAQMD Localized Significance Thresholds (LSTs)	N/A	237	1,488	N/A	12	7
Threshold Exceeded?	N/A	No	No	N/A	No	No

Notes: Emissions modeling was completed using CalEEMod. Some numbers may not add up precisely due to rounding.
 Maximum on-site emissions are the highest emissions that would occur on the project site from on-site sources such as heavy construction equipment and architectural coatings and excludes off-site emissions from sources such as construction worker vehicle trips and haul truck trips.
 Source: Albert A. Webb Associates 2020a

Operational

Table 6 summarizes the project’s operational emissions by emission source (area, energy, and mobile).

Table 6 Project Operational Emissions - Maximum Daily Emissions (lbs/day)

Emission Source	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Area	9.67	0.00	0.10	0.00	0.00	0.00
Energy	0.02	0.16	0.14	0.00	0.01	0.01
Mobile	3.05	50.27	42.45	0.29	16.21	4.56
Project Emissions	12.74	50.43	42.69	0.29	16.22	4.58
SCAQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Notes: Some project emissions may not add up precisely to the numbers indicated due to rounding.

Source: Albert A. Webb Associates 2020a

As shown in Table 6, the emissions generated by operation of the proposed project would not exceed SCAQMD regional thresholds for criteria pollutants. Therefore, the project would not contribute substantially to an existing or projected air quality violation. In addition, because criteria pollutant emissions and regional thresholds are cumulative in nature, the project would not result in a cumulatively considerable net increase of criteria pollutants.

Mitigation Measures

AQ-1 Architectural Coating

To reduce volatile organic compound (VOC) or reactive organic gas emissions associated with architectural coating, the Project designer and contractor shall reduce the use of paints and solvents by utilizing pre-coated materials (e.g. bathroom stall dividers, metal awnings), materials that do not require painting, and require coatings and solvents with a VOC content lower than required under South Coast Air Quality Management District (SCAQMD) Rule 1113 to be utilized. The construction contractor shall be required to utilize "Super-Compliant" VOC paints, which are defined in Rule 1113. Construction specifications shall be included in building specifications that assure these requirements are implemented. The specifications shall be reviewed by the City of Redland's Building and Safety Division for compliance with this mitigation measure prior to issuance of the project's building permit.

With implementation of the above mitigation measure, daily construction ROG emissions would be reduced to 33.74 pounds per day, and be below the SCAQMD threshold of 75 lbs per day. Therefore, with mitigation, the project would not exceed SCAQMD's regional construction thresholds or LSTs, and project construction would not result in a cumulatively considerable net increase of a criteria pollutant on a regional level, and project construction activities would have a less than significant impact after implementation of mitigation measures.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c. *Would the project expose sensitive receptors to substantial pollutant concentrations?*

"Sensitive receptors" refer to those people most susceptible to respiratory distress such as asthmatics, the elderly, very young children, people already weakened by other diseases or illness and persons engaged in strenuous work or exercise. SCAQMD defines a "sensitive receptor" as a

land use or facility such as residences, schools, childcare centers, athletic facilities, playgrounds, retirement homes, and convalescent homes (SCAQMD 1993).

Impacts to sensitive receptors are typically analyzed for exposure to toxic air contaminants (TACs) or operational period CO hot spots. These topics are further discussed below.

Construction

Project construction would result in temporary emissions of diesel particulate matter (DPM) in the form of exhaust emissions from off-road, heavy-duty, diesel equipment used for activities such as site preparation, grading, and building construction. DPM was identified as a TAC by CARB in 1998.

Generation of DPM from construction projects typically occurs in a single area for a short period. Construction of the proposed project would occur over approximately 11 months. The dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual (MEI). SCAQMD considers impacts from TAC emissions to be significant if they would result in a maximum incremental excess cancer risk greater than 10 in one million or a chronic or acute hazard index greater than 1.0 at the MEI.

The risks estimated for a MEI are higher if a fixed exposure occurs over a longer period of time. According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project. Thus, the duration of proposed construction activities (i.e., 11 months) is approximately 1.5 percent of the total exposure period used for health risk calculation. Current models and methodologies for conducting health-risk assessments are associated with longer-term exposure periods of 9, 30, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities.

The maximum PM₁₀ and PM_{2.5} emissions would occur during site preparation and grading activities. These activities would last for approximately five months. PM emissions would decrease for the remaining construction period because construction activities such as building construction and architectural coating would require less construction equipment. While the maximum DPM emissions associated with site preparation and grading activities would only occur for a portion of the overall construction period, these activities represent the worst-case condition for the total construction period. This would represent less than one percent of the total exposure period for health risk calculation. As a result, DPM generated by project construction would not create conditions where the probability is greater than 10 in one million of contracting cancer for the MEI or to generate ground-level concentrations of non-carcinogenic TACs that exceed a Hazard Index greater than one for the MEI. This impact would be less than significant.

Operation

Sensitive Receptor and Off-Site Worker Exposure Risk

Operation of the project would involve heavy-duty vehicles accessing and leaving the site, which would emit DPM and potentially create carcinogenic and non-carcinogenic health risks to surrounding sensitive receptors and on-site workers. The estimation of health risks (both cancer and

non-cancer) from DPM was performed was performed following the SCAQMD guidelines for health risk assessments from known DPM.

The closest sensitive receptors that would have the greatest potential exposure risk to DPM generated by the project are the existing Seventh-day Adventist church and Totally Kids Rehabilitation Hospital on the west side of Mountain View Avenue directly west of the project site. At this location, the maximum incremental cancer risk attributed to project emissions of DPM is estimated at 5.1 in one million, which is below the threshold of 10 in one million. At the same location, non-cancer risks were estimated to be 0.016, which would not exceed the applicable threshold of 1.0. All other modeled residential or other sensitive receptor locations would be exposed to less emissions and thus have reduced comparative risk. Therefore, the proposed project would not expose nearby sensitive receptors to significant health risks from DPM emissions.

CO Hot Spots

CO is an odorless, colorless gas and causes health problems including fatigue, headache, confusion, and dizziness. The incomplete combustion of petroleum fuels in on-road vehicles and at power plants is a major cause of CO. A CO hot spot is a localized concentration of CO that is above a CO ambient air quality standard. Localized CO hotspots can occur at intersections with heavy peak hour traffic. Specifically, hot spots can be created at intersections where traffic levels are sufficiently high such that the local CO concentration exceeds the federal one-hour standard of 35.0 parts per million (ppm) or the federal and state eight-hour standard of 9.0 ppm (CARB 2016).

In the 1992 SCAQMD CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included: Long Beach Boulevard and Imperial Highway (Lynwood); Wilshire Boulevard and Veteran Avenue (Westwood); Sunset Boulevard and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The busiest intersection evaluated in the 1992 CO Plan and subsequent 2003 AQMP was that at Wilshire Boulevard and Veteran Avenue which has a daily traffic volume of approximately 100,000 vehicles per day. The Los Angeles County Metropolitan Transportation Authority evaluated the LOS in the vicinity of the Wilshire Boulevard/Veteran Avenue intersection and found it to be level E at peak morning traffic and Level F at peak afternoon traffic. This hot spot analysis was conducted at intersections subject to extremes in vehicle volumes and vehicle congestion and did not predict any violation of CO standards.

Considering project-related traffic plus future buildout conditions in 2040, the highest average daily trips would be approximately 45,080 passenger car equivalents at the intersection of Mountain View Avenue and Redlands Boulevard, which is lower than the values studied by SCAQMD. Therefore, it can reasonably be concluded that project-related traffic would not have daily traffic volumes exceeding those at the intersections modeled in the 2003 AQMP, nor would there be any reason unique to the meteorology to conclude that intersections affected by the project would yield higher CO concentrations if modeled in detail. Thus, the project would not result in CO hot spots (Albert A. Webb Associates 2020a; Appendix C).

Construction and operation of the project would not result in exposure of sensitive receptors to substantial pollutant concentrations including DPM and CO. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

For construction activities, odors would be temporary in nature and are subject to SCAQMD Rule 402, *Nuisance*, which states that “A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property” (SCAQMD 2019). Construction activities would be temporary and transitory and associated odors would cease upon construction completion. Accordingly, the proposed project would not create objectionable odors affecting a substantial number of people during construction, and short-term impacts would be less than significant.

Common sources of operational odor complaints include sewage treatment plants, landfills, recycling facilities, and agricultural uses. The proposed project, which consists of two speculative non-refrigerated warehouse buildings, would not include any of these uses. Solid waste generated by the proposed on-site uses would be collected by a contracted waste hauler, thereby managing and collecting on-site waste in a manner to prevent the proliferation of odors. Operational odor impacts would be less than significant.

Neither construction nor operation of the project would result in other emissions that would adversely affect a substantial number of people.

LESS THAN SIGNIFICANT IMPACT

4 Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Biological Setting

Redlands is located in a largely urbanized portion of San Bernardino County, with areas of natural vegetation and critical habitat limited to the north along the Santa Ana River, east near the Crafton Hills, and south in San Timoteo Canyon. Natural communities include oak woodland, Riversidean alluvial fan sage scrub, and riparian forest, woodland, and scrub communities (Redlands 2017c).

Approximately 1,007 acres of the Santa Ana River and its tributaries in the northern area of Redlands have been designated critical habitat for the federally endangered Santa Ana sucker and approximately 4,476 acres along the Santa Ana River and its tributaries, consisting primarily of Riversidean alluvial fan sage scrub and annual grassland, has been designated as critical habitat for the federally endangered San Bernardino kangaroo rat. Approximately 104 acres of riparian habitat along San Timoteo Creek in the southern area of Redlands have been designated as critical habitat for the federally endangered southwestern willow flycatcher (Redlands 2017c). The project site is not located in or near critical these habitat areas.

Information in this section is provided by the Biological Resources Assessment (Rincon 2020b) provided in Appendix D. Prior to conducting the biological field survey, Rincon reviewed the project plans (provided by the client), aerial photographs and previous historical land use of the project site. Queries of the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB) (2020) and the California Native Plant Society (CNPS) Online Inventory of Rare and Endangered Plants (2020) were conducted to obtain comprehensive information regarding state and federally listed species as well as other special-status species considered to have potential to occur within a five-mile radius of the project site. For CNPS query purposes, a nine-quadrangle search area centered on the project site was used, species with elevation ranges exceeding that of the project site were excluded, and CRPR 4 species were excluded.

In addition, regionally occurring special-status biological resources and geological information related to the site were researched from the following sources:

- U.S. Fish and Wildlife Service (USFWS) Critical Habitat Portal
- USFWS Information, Planning, and Conservation System
- USFWS National Wetland Inventory (NWI) Mapper
- Natural Resources Conservation Service (NRCS) Web Soil Survey

A field reconnaissance survey was conducted by a Rincon biologist on July 10, 2020 to document the existing site conditions and to evaluate the potential for presence of special-status biological resources including special-status plant and animal species, sensitive plant communities, potentially jurisdictional waters of the U.S. and wetlands, and habitat for federally and state protected species.

The entire survey area is a disturbed and fallow agricultural field covered primarily in non-native grasses. Disturbed habitats have been physically disturbed (by previous legal human activity) and are no longer recognizable as a native or naturalized vegetation association but continue to retain a soil substrate. Typically, vegetation of disturbed/agricultural areas is nearly exclusively composed of non-native ruderal plant species that take advantage of disturbance and which removes any capability of providing viable natural habitat (Oberbauer et al. 2008). Plant species observed include wild oat (*Avena fatua*), ripgut brome (*Bromus diandrus*), red brome (*Bromus madritensis ssp. rubens*), horseweed (*Erigeron canadensis*), prickly lettuce (*Lactuca serriola*), Russian thistle (*Salsola tragus*), Johnson grass (*Sorghum halepense*), and cocklebur (*Xanthium strumarium*). Additionally, two non-native tree species were observed on the project site: ash (*Fraxinus sp.*) and eastern black

walnut (*Juglans nigra*). While it is in the same genus as southern California black walnut (*Juglans californica*), which is native to California, eastern black walnut is a cultivar originating from the eastern United States and is not native to California. Eucalyptus (*Eucalyptus* sp.) trees are also present south of the project site, between it and I-10. These tree species are common ornamental trees grown in agricultural environments throughout San Bernardino County (Rincon 2020b).

The project site provides little habitat for wildlife species due to its developed and disturbed nature, lack of native vegetation and high levels of surrounding human activity. The ash and walnut trees in the survey area could provide habitat for common nesting birds protected under the California Fish and Game Code (CFG) Section 3503 and the Migratory Bird Treaty Act (MBTA). Species observed on site during the survey included white-throated swift (*Aeronautes saxatalis*), red-tailed hawk (*Buteo jamaicensis*), rock pigeon (*Columba livia*), American crow (*Corvus brachyrhynchos*), American kestrel (*Falco sparverius*), house finch (*Haemorhous mexicanus*), house sparrow (*Passer domesticus*), black phoebe (*Sayornis nigricans*), Say's phoebe (*Sayornis saya*), lesser goldfinch (*Spinus psaltria*), European starling (*Sturnus vulgaris*), western kingbird (*Tyrannus verticalis*), and mourning dove (*Zenaida macroura*). Two reptile species were observed: gopher snake (*Pituophis melanoleucus*) and western fence lizard (*Sceloporus occidentalis*). Mammal species observed consisted of pocket gopher (*Thomomys* sp.) and California ground squirrel (*Otospermophilus beecheyi*) (Rincon 2020b).

- a. *Would the project 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 Wildlife or U.S. Fish and Wildlife Service?*

The CNDDDB/CNPS query results include 47 special-status plant species within five miles (9-quad for CNPS) of the project site. Special-status plant species typically have specialized habitat requirements, including plant community types, soils and elevational ranges. Of the 47 species, 25 are not expected to occur based on the project site's location and clear lack of suitable habitat (e.g., mountains, desert, elevational ranges). For the 22 remaining species, based on prior and ongoing disturbance at the site from disking, prevalence of non-native species, and isolation from larger stands of natural habitat, the project site does not contain suitable habitat for special-status plant species, and all are classified as having no potential to occur on site. No special-status plant species were observed during the site reconnaissance survey. As a result, special-status plant species are not expected to occur on the site; therefore, impacts to special-status plant species would not occur.

The CNDDDB query results include 34 special-status wildlife species within five miles of the project site. The potential for special-status wildlife species to occur on the site was assessed based on known distribution, habitat requirements, and existing site conditions. No special-status wildlife species were determined to have a moderate or higher potential to occur on site and similarly none were detected within or immediately surrounding the survey area during the site reconnaissance survey. The lack of potential for special-status wildlife species occurrence is based on low habitat quality of the disturbed agricultural areas of the site, lack of native vegetation, isolation from other suitable habitat due to developed land uses surrounding the site, and the presence of significant highway noise from adjacent I-10.

Two wildlife species were determined to have a low potential to occur on the site: California horned lark (*Eremophila alpestris actia*), CDFW Watch List, and burrowing owl (*Athene cunicularia*; BUOW), CDFW Species of Special Concern (SSC). Low quality or marginal foraging and/or nesting habitat for both species is present on the project site. Fallow grain fields are among the preferred habitats for

California horned lark; this species is typically a ground nester and is capable of nesting on bare ground, which is present within the site. BUOW could potentially occur in fallow agriculture fields where burrows and California ground squirrels are present, such as the project site. However, the low habitat quality and the low potential for these species to occur are due to the site's isolation from other suitable habitat, the developed land uses surrounding the site, the high level of existing disturbance, and the presence of significant highway noise from adjacent I-10, which would likely deter individuals from long-term use of the site. No horned larks, BUOW, or sign of either species (e.g., pellets or white wash) were observed during the reconnaissance survey (Rincon 2020b).

The project proposes the removal of vegetation that may provide low quality habitat for California horned lark and BUOW. As such, the project may result in loss of such habitat, as well as potential injury or death to individuals. It should be noted that California horned lark and BUOW are not geographically restricted to the vicinity of the project site and the loss of low-quality habitat would not significantly affect the species. Direct impacts (e.g., injury or mortality) or indirect impacts (e.g., noise, dust) to BUOW or California horned lark would be significant. Even though BUOW has a low potential to occur on the project site, implementation of a pre-construction BUOW clearance survey is recommended to avoidance impacts to BUOW. Similarly, a pre-construction nesting bird survey is recommended to avoid impacts to California horned lark (discussed below). Given that other, regionally-occurring special-status species are not expected to occur on the project site, and with the implementation of recommended pre-construction surveys, the proposed project would have a less-than-significant effect on any candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS (Rincon 2020b).

As noted above, trees and vegetation on the project site could provide suitable nesting habitat for common avian species that were observed during the reconnaissance survey, as well as California horned lark. Bird nests and eggs are protected under the CFGC Section 3503 and the MBTA. Common species such as mourning dove and house finch have the potential to nest in shrubs, even in highly disturbed settings. California horned lark is capable of nesting on bare ground. Direct impacts (e.g., injury or mortality) to nesting birds or indirect impacts (e.g., noise, dust) that disrupt nesting behavior and reproductive success would be significant.

Implementation of Mitigation Measures BIO-1 and BIO-2 would require pre-construction nesting bird surveys to reduce impacts to nesting birds to less than significant.

Mitigation Measures

BIO-1 Burrowing Owl Pre-construction Clearance Survey

A qualified wildlife biologist shall conduct a pre-construction survey of proposed impact areas to confirm presence/absence of burrowing owl (BUOW) individuals no more than 30 days prior to construction. The survey methodology will be consistent with the methods outlined in the California Department of Fish and Wildlife (CDFW) *Staff Report on Burrowing Owl Mitigation* (2012). If no active breeding or wintering owls are identified, no further mitigation is required.

If BUOW is detected onsite, the following mitigation measures are recommended to be implemented in accordance with the *CDFW Staff Report on Burrowing Owl Mitigation* (2012):

- A qualified wildlife biologist shall be onsite during initial ground-disturbing activities in potential BUOW habitat.
- No ground-disturbing activities shall be permitted within a buffer no less than 200 meters (656 feet) from an active burrow, depending on the level of disturbance, unless otherwise authorized

by CDFW. Occupied burrows should not be disturbed during the nesting season (February 1 to August 31), unless a qualified biologist verifies through noninvasive methods that either: (1) the birds have not begun egg-laying and incubation; or (2) juveniles from the occupied burrows are foraging independently and are capable of independent survival.

- During the nonbreeding (winter) season (September 1 to January 31), ground-disturbing work can proceed near active burrows as long as the work occurs no closer than 50 meters (165 feet) from the burrow, depending on the level of disturbance, and the if site is not directly affected by the project activity. A smaller buffer may be established in consultation with CDFW. If active winter burrows are found that would be directly affected by ground-disturbing activities, owls can be excluded from winter burrows according to recommendations made in the *Staff Report on Burrowing Owl Mitigation* (2012).
- BUOWs should not be excluded from burrows unless or until a Burrowing Owl Exclusion Plan is developed based on the recommendations made in the CDFW *Staff Report on Burrowing Owl Mitigation* (2012).
- Compensatory mitigation for lost breeding and/or wintering habitat should be implemented on- or off-site through implementation of a Mitigation Land Management Plan based on the CDFW *Staff Report on Burrowing Owl Mitigation* (CDFW 2012) guidance.

Mitigation lands should be on, adjacent, or proximate to the impact site where possible and where habitat is sufficient to support BUOW present.

BIO-2 Pre-construction Nesting Bird Surveys

Migratory or other common nesting birds, while not designated as special-status species, are protected by the California Fish and Game Code (CFGC) and Migratory Bird Treaty Act (MBTA) and may nest in ornamental trees and shrubs on site. Construction of the project thus has the potential to directly (by destroying a nest) or indirectly (construction noise, dust, and other human disturbances that may cause a nest to fail) impact nesting birds protected under the CFGC and MBTA. The following measure is recommended to maintain compliance with the CFGC Section 3503 and the MBTA with respect to nesting birds:

- If vegetation trimming or removal activities take place during the bird nesting season (generally February 1 through August 31, but variable based on seasonal and annual climatic conditions), nesting bird surveys are recommended to be performed by a qualified biologist within seven days prior to such activities to determine the presence/absence, location, and status of any active nests on site or within 100 feet of the site.
- If nesting birds are found on site, a construction buffer of appropriate size (as determined by the qualified biologist) should be implemented around the active nests and demarcated with fencing or flagging. Nests should be monitored at a minimum of once per week by the qualified biologist until it has been determined that the nest is no longer being used by either the young or adults. No ground disturbance should occur within this buffer until the qualified biologist confirms that the breeding/nesting is complete, and all the young have fledged. If project activities must occur within the buffer, they should be conducted at the discretion of the qualified biologist.
- If no nesting birds are observed during pre-construction surveys, no further actions would be necessary.

With implementation of the above mitigation measures, impacts to biological resources would be less than significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- b. *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

The entire project site is a disturbed agricultural field that is frequently subject to human disturbance, including disking. No natural habitat areas are present on the project site (Rincon 2020b). Therefore, the project would not have a substantial adverse effect on any riparian habitat, or other sensitive natural community. No impact would occur.

NO IMPACT

- c. *Would the project 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?*

The entire project site is a disturbed agricultural field that has frequently been subject to human activity including disking. An earthen bottom flood control channel is located adjacent to the project site and separated from it by a chain-link fence. While a formal jurisdictional delineation was not performed, the channel is classified as riverine by the NWI (USFWS 2020) and may potentially be under the jurisdiction of various regulatory agencies, including the CDFW, U.S. Army Corps of Engineers, and the Regional Water Quality Control Board (RWQCB), as a federal and state water. The project does not propose any construction or operational activities that would directly impact the channel. Indirect impacts from potential storm water runoff, dust, or spills of hazardous materials during or after construction, would be less than significant as a result of the project's required compliance with a National Pollutant Discharge Elimination System (NPDES) Construction General Permit, and preparation and implementation of a Storm Water Pollution Prevent Plan (SWPPP) and best management practices. As a result, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project 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?*

The project site is located in a developed urban area and surrounded by urbanized uses on all sides, including commercial and residential development and heavily travelled paved roadways including I-10. The entire project site is a disturbed agricultural field that is frequently subject to human activity including disking. The project site contains no natural habitat areas, nor does it provide connection to any natural habitat areas (Rincon 2020b). Potential wildlife movement along the flood control channel located to the north and east of the site could occur; however, project construction and operation activities are not anticipated to affect the flood control channel. Therefore, the project would not interfere with the movement of any native wildlife species. No impact would occur.

NO IMPACT

- e. *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

Redlands Municipal Code Section 12.52 protects native trees that exceed eight inches diameter measured at 4.5 feet above natural grade. The ash and eastern black walnut trees on the project site, and the eucalyptus trees adjacent to the site, are not native to California. Rather, as noted above, these species are commonly planted in agricultural areas throughout San Bernardino County. As a result, they do not meet Redlands Municipal Code criteria to be considered protected trees. Therefore, should project activities remove or otherwise impact the trees, such actions would not conflict with local policies or ordinances protecting biological resources. No impact would occur.

NO IMPACT

- f. *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

No adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or State habitat conservation plans apply to the project site. No impact would occur.

NO IMPACT

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5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 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 Section 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 formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The analysis herein is based on a site-specific *Cultural Resources Assessment Report for Planned Development No. 4 Project* (Rincon 2020c; Appendix E).

CEQA requires a lead agency to determine whether a project may have a significant impact on historical resources (Public Resources Code, Section 21084.1). The significance of cultural resources and impacts to those resources is determined by whether or not those resources can increase our collective knowledge of the past. The primary determining factors are site content and degree of preservation. CEQA Guidelines Section 15064.5 states the term “historical resources” shall include the following:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in, the California Register of Historical Resources Public Resources Code Section 5024.1, Title 14 California Code of Regulations [CCR], Section 4850 et. seq.).
2. A resource included in a local register of historical resources, as defined in Public Resources Code Section 5020.1(k) or identified as significant in an historical resource survey meeting the requirements of Public Resources Code Section 5024.1(g), shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing in the California Register of Historical Resources [CRHR] (Public Resources Code Section 5024.1, Title 14 CCR, Section 4852) as follows:
 - Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage

Mountain View Industrial Project

- Is associated with the lives of persons important in our past
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values
- Has yielded, or may be likely to yield, information important in prehistory or history (CEQA Guidelines Section 15064.5)

Properties listed on the National Register of Historic Properties are automatically listed on the CRHR, along with State Landmarks and Points of Interest. The CRHR can also include properties designated under local ordinances or identified through local historical resource surveys.

Pursuant to Public Resources Code Section 21084.1, a project that may cause a substantial adverse change in the significance of a historical resource may have a significant impact on the environment. A “substantial adverse change” in the significance of a historical resource is defined as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” CEQA Guidelines Section 15064.5(b) states the significance of an historical resource is “materially impaired” when a project does any of the following:

- Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in the CRHR
- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources or its identification in an historical resources survey, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant
- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by a lead agency for purposes of CEQA

In addition, if it can be demonstrated that a project would cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (Public Resources Code Section 21083.2[a], [b]).

Public Resources Code Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type
3. Is directly associated with a scientifically-recognized important prehistoric or historic event or person

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Rincon conducted a records search of the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC) located at California State University, Fullerton. The SCCIC records search identified 51 previously conducted cultural resources studies within a one-mile radius of the project site. These studies identified 81 previously recorded resources within a one-mile radius of the project site, including two (P-36-026051 and P-36-026224) located within the current project site boundaries. These resources are the Devers-San Bernardino 220kV Transmission Line and the San Bernardino-Redlands-Timoteo and San Bernardino-Redlands-Tennessee Subtransmission Lines. Both of these previously recorded cultural resources have previously been recommended ineligible for listing on the NRHP and CRHR and are not considered historical resources for the purposes of CEQA (Rincon 2020c; Appendix E).

Aerial imagery depicts the project site use as an orchard from 1938 to 1994, then a graded space to present. The SBCTA railroad and Mission Zanja flood control channel adjacent to the project boundaries are considered historic resources, but would not be impacted by the project (Rincon 2020c; Appendix E). The project site does not contain any historic resources listed by Redlands. Redlands has eight historic districts, none of which include the project site (Redlands 2019b).

The project site is not located in a historic district and does not contain any listed or eligible structures. The project site is heavily disturbed and undeveloped except for utility infrastructure. As such, the project would not result in a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. No impact would occur.

NO IMPACT

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

As previously discussed in criterion a., the cultural resource records search identified 81 previously recorded cultural resources within one mile of the current project site. However, the pedestrian cultural resources survey conducted July 2020 did not identify cultural resources within the project boundaries (Rincon 2020c; Appendix E).

The project site is a disturbed vacant lot with ruderal grasses. Although no archaeological resources were identified in the cultural resources records search, the project would involve grading and site disturbance with the potential to damage unknown resources. Although the project site does not lie in a highly sensitive area for archaeological resources, there remains the potential to encounter unanticipated archaeological resources during ground-disturbing activities associated with project construction. Construction activities may result in the destruction, damage, or loss of undiscovered, scientifically-important archaeological resources. Consequently, impacts to archaeological resources would be potentially significant. Implementation of Mitigation Measures CUL-1 and CUL-2 would reduce potential impacts to archaeological resources to a less than significant by providing monitoring and direction on how to properly address an unanticipated discovery of archaeological resources should any occur during construction.

Mitigation Measure

CUL-1 Worker's Environmental Awareness Program

The applicant shall retain a qualified archaeologist who meets or exceeds the Secretary of Interior's Professional Qualification Standards for archaeology to conduct a Worker's Environmental Awareness Program (WEAP) training for all construction personnel prior to the commencement of any ground-disturbing activities. The sensitivity training should include, but is not limited to the following topics: types of cultural material that may be encountered, cultural sensitivity issues, the regulatory environment, and the proper protocol for treatment of the materials in the event of a discovery.

CUL-2 Inadvertent Discoveries

The Applicant shall retain a Secretary of Interior Standards qualified archaeological monitor. The monitor shall be present during all ground-disturbing activities to identify any known or suspected archaeological and/or cultural resource. The qualified archaeologist shall develop an Archaeological Monitoring and Treatment Plan to address the details, timing and responsibility of all archaeological and cultural resource activities that occur on the project site. The plan shall be developed in coordination with the City of Redlands. The Monitoring and Treatment Plan shall incorporate the components described in Mitigation Measure TCR-1 but not be limited to:

- a. Project grading and development scheduling.
- b. A rotating monitoring schedule during all ground related activities, including but not limited to, all site preparation/construction/demolition-based activities, testing and data recovery on the project site. The monitoring plan shall include scheduling, safety requirements, duties, scope of work, and a discussion of the Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with the Project Archaeologists.
- c. The protocols and stipulations that the Applicant, City of Redlands, Native American Tribal Monitor(s) and Project Archaeologist shall follow in the event of previously unknown cultural resources discoveries that could be subject to a cultural resources evaluation.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- c. *Would the project disturb any human remains, including those interred outside of formal cemeteries?*

No known human remains have been documented on the project site or the immediate vicinity. While the project site is unlikely to contain human remains, the potential for the recovery of human remains during ground-disturbing activities is always a possibility. If human remains are found, existing regulations outlined in the State of California Health and Safety Code Section 7050.5 state that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be prehistoric or Native American in origin, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of being granted access and provide recommendations as to the treatment of the remains to the landowner. Additionally, Mitigation Measure TCR-4 as discussed in Section 18, *Tribal Cultural Resources*, would apply and would reduce potential impacts by requiring protocols in the event that human remains

or funerary objects are found during ground-disturbing activities. Therefore, impacts to human remains would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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6 Energy

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

Electricity and Natural Gas

Southern California Edison (SCE) would provide electricity to the project area. Table 7 shows the electricity consumption by sector and total for SCE for 2018, the most recent available data.

Table 7 Electricity Consumption in the SCE Service Area in 2018

Agriculture and Water Pump	Commercial Building	Commercial Other	Industry	Mining and Construction	Residential	Streetlight	Total Usage
3,192	31,574	4,367	13,392	2,390	29,865	496	85,276

Notes: All usage expressed in GWh

Source: California Energy Commission (CEC) 2020a

SCE’s energy sources include renewable power sources, large hydroelectric, natural gas, nuclear, and unspecified sources of power (electricity from transfers that are not traceable to specific generation sources). SCE’s “Green Rate” program provides an option for residential and business customers to offset half or all of their energy usage by paying into a fund for solar energy sources (SCE 2020). San Bernardino County consumed 15,634 GWh of electricity in 2018 (CEC 2020b).

Southern California Gas (SCG) would provide electricity to the project area. Table 8 shows the natural gas consumption by sector and total for SCG for 2018, the most recent available data.

Table 8 Natural Gas Consumption in SCG Service Area in 2018

Agriculture and Water Pump	Commercial Building	Commercial Other	Industry	Mining and Construction	Residential	Total Usage
78	913	75	1,714	229	2,147	5,156

Notes: All usage expressed in million therms (MMThm)

Source: CEC 2020c

Petroleum

In 2018, approximately 40 percent of the state’s energy consumption (3,170 trillion British Thermal Units [Btu]) was used for transportation activities (U.S. Energy Information Administration [EIA] 2020). Though California’s population and economy are expected to grow, gasoline demand is projected to decline from roughly 15.8 billion gallons in 2017 to between 12.3 billion and 12.7 billion gallons in 2030, a 20 percent to 22 percent reduction. This decline comes in response to both increasing vehicle electrification and higher fuel economy for new gasoline vehicles (CEC 2018a).

- a. *Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

Construction Energy Demand

During project construction, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, and vehicles used to deliver materials to the site. The project would require demolition, site preparation, and grading, including hauling material off-site; pavement and asphalt installation; building construction; architectural coating; and landscaping and hardscaping.

The total consumption of gasoline and diesel fuel during project construction was estimated using the assumptions and factors from CalEEMod and fleet-average fuel consumption in gallons per mile from EMFAC2017 web-based data for San Bernardino County (Albert A. Webb Associates 2020a; Appendix C). Table 9 shows the fuel consumption from worker and vendor trips associated with project construction. No hauling trips were associated with project construction.

Table 9 On-Road Construction Trip Estimates

Trip Type	Trips	Trip Length (miles)	Vehicle Miles Traveled (VMT)	Fuel Efficiency (mpg)	Annual Fuel Usage ¹ (gallons)
Worker ^{2,3}	95,538	16.6	1,585,931	27.5 Gasoline	57,018
Vendor ⁴	36,327	8.4	305,147	8.5 Diesel	37,606
Total					94,624

¹ On-road mobile source fuel use based on vehicle miles traveled (VMT) from CalEEMod output (Appendix C) for construction and fleet-average fuel consumption in gallons per mile from EMFAC2017 web-based data for 2020 in San Bernardino County.

² Worker trips were assumed to be 100 percent gasoline-powered vehicles.

³ CalEEMod, worker trips were assumed to be 50 percent light-duty auto, 25 percent light-duty truck type 1, and 25 percent light-duty truck type 2.

⁴ Vendor trips were assumed to be 50 percent medium-duty trucks and 50 percent heavy-duty trucks, split evenly between the construction categories.

⁵ CalEEMod, hauling trips were assumed to be 100 percent heavy heavy-duty diesel trucks.

Source: Appendix C

Table 10 presents the total estimated construction phase energy consumption, indicating that construction equipment, vendor trips, and worker trips would consume over 156,000 gallons of fuel over the project construction period. Construction energy calculations are included in Appendix C of this document.

Table 10 Total Construction-Related Fuel Consumption

Fuel Type	Gallons of Fuel
Diesel	
On-Road Construction Trips ¹	37,606
Off-Road Construction Equipment ²	62,134
Total	99,740
Gasoline	
On-Road Construction Trips ¹	57,018
Off-Road Construction Equipment ³	–
Total	57,018

¹ On-road mobile source fuel use based on vehicle miles traveled (VMT) from CalEEMod for construction in 2020, and fleet-average fuel consumption in gallons per mile from EMFAC2017 web-based data for San Bernardino County. See Table 2 for calculation details.

² Off-road mobile source fuel usage based on a fuel usage rate of 0.05 gallons of diesel per horsepower (HP)-hour, based on SCAQMD CEQA Air Quality Handbook, Table A9-3E.

³ All emissions from off-road construction equipment were assumed to be diesel.

Source: Albert A. Webb and Associates 2020a; Appendix C

The construction energy estimates represent a conservative estimate because the construction equipment used in each phase of construction was assumed to be operating every day of construction. According to the *California Annual Retail Fuel Outlet Report Results*, retail diesel sales in San Bernardino County totaled approximately 195 million gallons while retail gasoline sales totaled over 217 million gallons in 2018 (CEC 2020). Therefore, fuel consumption associated with project construction would account for less than 0.05 percent of annual retail diesel sales and less than 0.03 percent of annual retail gasoline sales in the County.

Construction equipment would be maintained to applicable standards, and construction activity and associated fuel consumption and energy use would be temporary and typical for construction sites. It is also reasonable to assume that contractors would avoid wasteful, inefficient, and unnecessary fuel consumption during construction to reduce construction costs. Therefore, the project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and the construction-phase impact related to energy consumption would be less than significant.

Operational Energy Demand

Operation of the project (two, speculative non-refrigerated warehouse buildings) would increase area energy demand from greater electricity, natural gas, and gasoline consumption at a site with no previous development or uses. Natural gas and electricity would be used for heating and cooling systems, lighting, appliances, water use, and the overall operation of the project buildings. Gasoline consumption would be attributed to the trips generated from project residences. The estimated number of average daily trips associated with the project from CalEEMod is used to determine the

energy consumption associated with fuel use from the operation of the project. The majority of the fuel consumption would be from motor vehicles traveling to and from the project site. According to the CalEEMod calculations, the project would result in approximately 19,919 annual VMT. Table 11 shows the estimated total annual energy consumption of the project. One gallon of gasoline is equivalent to approximately 109,772 Btu), while one gallon of diesel is equivalent to approximately 127,460 Btu (CARB 2018, Schremp 2017).

Table 11 Annual Energy Consumption from Operation

Fuel Type	Annual Consumption	Consumption Units	Annual Energy Consumption
Building Electricity ¹	1,150,825	kWh	1,150,825 kWh
Water Electricity ²	1,015,105	kWh	1,015,105 kWh
Total Electricity	2,165,930	kWh	2,165,930 kWh
Natural Gas	601,940	kBTU	601,940 kBTU
Gasoline Fuel	168,254	gallons	18,470 mBTU
Diesel Fuel	280,629	gallons	35,767 mBTU
Total Mobile Sources	448,883	gallons	54,239 mBTU

kWh = kilowatt hour, kBTU = thousand British Thermal Units, mBTU = million British Thermal Units

¹ From CalEEMod output.

² Calculated based on the project's annual water consumption and SCAQMD energy intensity of 0.0111 kWh per gallon for supply, distribution, and treatment of water and 0.013021 kWh per gallon for supply, distribution, and treatment of water and wastewater treatment.

³ Mobile source fuel use based on annual vehicle miles traveled (VMT) from CalEEMod output for operational year 2021 and fleet-average fuel consumption in gallons per mile from EMFAC2017 web-based data in San Bernardino County. Using rates of 109,772 Btu/gallon gasoline fuel and 127,460 Btu/gallon diesel fuel.

Source: Albert A. Webb Associates 2020a (Appendix C)

As shown in Table 11, operation of the proposed project would consume approximately 2,165,930 kWh of electricity per year. As previously mentioned, the project would be served by SCE, which provided more than 84,000 GWh of electricity in 2018. The project would consume less than 0.0001 percent of SCE’s annual electricity demand. Additionally, SCE has not provided any indication that it cannot serve the project. Therefore, SCE would have sufficient supplies for the project and would not place a significant demand on the electrical supply. Estimated natural gas consumption for the project would be approximately 601,940 kBTU per year, or 6,021 therms (Appendix C). The project’s natural gas demand would be served by SCG, which provided 5,156 MMthm per year in 2018. The project would consume less than 0.0001 percent of SCG’s natural gas demand. SCG has not provided any indication that it cannot serve the project. Therefore, SCG would have sufficient supplies for the project.

The project would also comply with all standards set in California Building Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. California’s Green Building Standards Code (CALGreen; California Code of Regulations, Title 24, Part 11) requires implementation of energy efficient light fixtures and building materials into the design of new construction projects. The proposed buildings would be equipped with solar-ready conduits for future photovoltaic panels.

Furthermore, the 2019 Building Energy Efficiency Standards (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the California Energy

Commission (CEC). As the name implies, these standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. The standards are updated every three years and each iteration is more energy efficient than the previous standards. For example, according to the CEC, residential buildings meeting 2019 standards will use about seven percent less energy due to energy efficiency measures versus those built under the 2016 standards (CEC 2018a). Non-residential buildings would use about 30 percent less energy compared to 2016 standards (CEC 2018a). Furthermore, the project would further reduce its use of nonrenewable energy resources as the electricity generated by renewable resources provided by SCE continues to increase to comply with state requirements through Senate Bill 100, which requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

In conclusion, construction of the project would be temporary and typical of similar projects and would not result in wasteful use energy. Operation of the project would increase the use of electricity on-site. However, the increase would be in conformance with the latest version of California's Green Building Standards Code and Building Energy Efficiency Standards. In addition, SCE and SCG have sufficient supplies to serve the project. Therefore, project operation would not result in wasteful or unnecessary energy consumption. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The Redlands General Plan and Climate Action Plan provide various GHG emission reduction measures to help achieve the Redlands GHG reduction goals that would also reduce energy consumption. The project would be consistent with the applicable measures. Measures and actions that would involve energy efficiency measures include:

Redlands General Plan

- **8-A.1** Work with Southern California Edison Company (SCE) and Southern California Gas Company (SCG) to educate the public about the need to conserve energy resources and the higher energy efficiency of new appliances and building materials.
- **8-A.2** Support San Bernardino County and San Bernardino Associated Governments (SANBAG) in implementation of their energy-related policies.
- **8-A.3** Leverage and help drive community participation in utility company programs and financial incentives within the City (e.g., one stop information clearinghouse, incentives, on bill financing, etc.).
- **8-A.4** Continue pursuit of sustainable energy sources—such as hydroelectricity; geothermal, solar, and wind power; and biomethane—to meet the community's needs.
- **8-A.5** Accelerate the adoption of solar power and/or other alternative energy usage in Redlands through actions such as: Establishing incremental growth goals for solar power/alternative energy systems in Redlands; Developing guidelines, recommendations, and examples for cost-effective solar and/or other alternative energy-based installation; and Installing solar/alternative energy technology on available City spaces.

Mountain View Industrial Project

- **8-A.6** Complete a cost-benefit analysis for new City energy conservation or renewable energy projects that reviews the costs and benefits of a project over its life cycle to ensure the highest and best use of available funds.
- **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.
- **8-A.8** Implement and enforce California Code of Regulations Title 24 building standards (parts 6 and 11) to improve energy efficiency in new or substantially remodeled construction. Consider implementing incentives for builders that exceed the standards included in Title 24 and recognize their achievements over the minimum standards.

Climate Action Plan

- Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;
- Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;
- Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;
- Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;
- Establish a mechanism to monitor the plan’s progress toward achieving the level and to require amendment if the plan is not achieving specified levels; and
- Be adopted in a public process following environmental review.

The project would incorporate the following sustainable features: water efficient irrigation system, low-flow plumbing fixtures, energy efficient HVAC system and optimize energy performance, implement construction and demolition waste management plan, use of environmentally friendly construction materials such as low emitting materials and renewable materials, where possible.

In accordance with General Plan Policy 8-A.8, the project would be constructed in accordance with, California Code of Regulations Title 24 building standards, which would improve energy efficiency in new or substantially remodeled construction (Redlands 2017a).

The project would be developed approximately 0.3 mile north from the OmniTrans Routes 8 and 19 bus stops at Redlands Boulevard and Mountain View Avenue. This allows for access to public transportation for project employees to reduce VMT, thus aligning with the Redlands General Plan to reduce energy use.

Based on the above, the project would not conflict with applicable goals of the Redlands General Plan and Climate Action Plan, and the project would not conflict with or obstruct a plan for renewable or energy efficiency, and there would be no impact.

NO IMPACT

7 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. 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 1-B of the Uniform Building Code (1994), 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 wastewater disposal systems where sewers are not available for the disposal of wastewater?	<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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The analysis in this section is based, in part, on the *Geotechnical Investigation for the Two Proposed Warehouses* prepared by Southern California Geotechnical (SoCalGeo 2019a). The study is included as Appendix F.

Geologic Setting

The project area is in a relatively flat portion of southern San Bernardino County in the Peninsular Range Geomorphic Province. The Peninsular Ranges province consists of a series of ridges extending approximately 900 miles from the Los Angeles basin southeastward to the tip of Baja California, Mexico. The province is approximately 80 to 100 miles wide and bordered by the Transverse Ranges to the north, the Salton Trough to the east, and the Pacific Ocean to the west. The Transverse Ranges Province is characterized by east-west trending mountain ranges and valleys that truncate the prevailing north-northwest trend of California's coastal ranges. The Transverse Ranges Province is bordered by the Mojave Desert to the north and east, Peninsular Ranges to the south, Coast Ranges to the northwest, and the Pacific Ocean to the west (California Geological Survey 2002).

The dominant features of the Peninsular Ranges consist of northwest-trending fault zones. Faulting has manifested itself as a series of right-lateral northwest-trending transform faults, including the Palos Verdes, Newport-Inglewood, Norwalk-Anaheim Hills, Whittier-Elsinore, and San Jacinto Faults. Within the Transverse Ranges there are abundant compressional reverse and thrust faults as well as strike-slip faults trending in an east-west direction, including the San Andreas Fault located approximately 20 miles northwest of Redlands (Redlands 2017c). While active or potentially active faults are not known to transect the project site, the project site may be expected to experience moderate to potentially severe ground shaking from earthquakes generated on the aforementioned faults or other faults in the seismically active southern California region. Seismic events can result in ground shaking, liquefaction, landslides, subsidence, tsunami, and seiche.

a.1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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?

The project area is located within a seismically active area where several faults and fault zones are considered active by the California Department of Conservation, Division of Mines and Geology. Alquist-Priolo Earthquake Fault Zones have been established for most of these faults and fault zones. The purpose of the Alquist-Priolo Earthquake Fault Zones is to prohibit the location of structures on the traces of active faults, thereby mitigating potential damage due to fault surface rupture (Redlands 2017c).

Research of applicable maps indicates that the subject site is not located within an Alquist-Priolo Earthquake Fault Zone. The technical report provided by SoCalGeo did not identify any evidence of faulting during the geotechnical investigation. Therefore, the possibility of significant fault rupture on the site is low. The local faults map included in the Redlands General Plan EIR indicates the closest fault to the project site is the San Andreas Fault, located approximately five miles north of the project site (Redlands 2017c). Furthermore, potential adverse effects on people or structures from the rupture of a known earthquake fault would be minimized by CBC requirements that protect buildings from fault rupture, and the policies proposed in the Redlands General Plan Update. These policies require geotechnical reports and continued restrictions near active/potentially active faulting. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.2. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

While not located on a known active or potentially active fault, the project site is located within seismically active southern California and may be subject to moderate to severe seismic ground shaking.

As stated above, the geotechnical analysis prepared by SoCalGeo (Appendix F) found that the project is in an area that is subject to strong ground motions due to seismic activity. Therefore, it is recommended to build structures that are not susceptible to earthquake damage and accommodate strong seismic shaking.

Redlands regulates development (and reduces geologic and seismic impacts) through the requirements of the CBC, as adopted in Chapter 15 of the Redlands Code of Ordinances (Redlands 2016). The CBC requires various measures of all construction in California to minimize risks associated with seismic shaking. These measures include standards for structural design, necessary tests and inspections, provisions addressing building foundations, and standards for the use of certain materials. With adherence to the requirements of the CBC, as required by the Redlands Code of Ordinances, the project would result in less than significant impacts related to seismically induced ground shaking from nearby faults.

LESS THAN SIGNIFICANT IMPACT

a.3. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Liquefaction is a phenomenon where loose, saturated, non-cohesive soils such as silts, sands, and gravels undergo a sudden loss of strength during earthquake shaking. These soils may acquire a high degree of mobility and lead to structurally damaging deformations. Liquefaction begins below the water table, but after liquefaction has developed, the groundwater table will rise and cause the overlying soil to mobilize. Liquefaction typically occurs in areas where groundwater is less than 30 feet from the surface and where the soils are composed of poorly consolidated fine- to medium-grained sand. In addition to the necessary soil conditions, the ground acceleration and duration of the earthquake must also be of a sufficient level to initiate liquefaction.

According to Figure 3.6-4 of the Redlands General Plan and the California Earthquake Hazards Zone Application, the project site is not located in a liquefaction zone. The only locations with liquefaction susceptibility are along the Santa Ana River Wash and in Mentone. Downtown Redlands, however, is situated upon alluvial fan deposits, which may have potential for impacts related to liquefaction as the result of severe seismic shaking (Redlands 2017c).

Furthermore, the California Geological Survey (CGS) has not yet conducted detailed seismic hazards mapping in the subject site. The general liquefaction susceptibility of the site was determined by research of the San Bernardino County Official Land Use Plan, General Plan, Geologic Hazard Overlay. Map FH31 for the Redlands Quadrangle indicates that the subject site is not located within an area of liquefaction susceptibility (SoCalGeo 2019a). Based on the mapping performed by the county of San Bernardino and the subsurface conditions encountered at the boring locations including the lack of a static ground water table, liquefaction is not considered to be a design concern for this project.

The condition of liquefaction has two principal effects. One is the consolidation of loose sediments with resultant settlement of the ground surface. The other is lateral sliding. Significant permanent

lateral movement generally occurs only when there is significant differential loading, such as fill or natural ground slopes, in susceptible materials. No such loading conditions exist on the site. The potential for liquefaction or seismically induced dynamic settlement is very low in the areas proposed for development at the project site (SoCalGeo 2019a). Therefore, potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.4. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

The project site is generally flat, with elevations ranging from 1,101 feet on the northwestern portion of the site to approximately 1,114 feet on the southeastern portion of the site. According to the California Department of Conservation's Earthquake Zones of Required Investigation Map, no portion of the project site is located in a landslide hazard area; the nearest landslide hazard zones are located in the southern portion of Redlands. Many of the hazard zones are located immediately south of San Timoteo Canyon and along the 60 freeway throughout the Badlands, approximately 11 miles southeast of the project site (DOC 2018). Given that the project site is not located in a landslide hazard zone, no impact would occur.

NO IMPACT

b. Would the project result in substantial soil erosion or the loss of topsoil?

Construction activities would disturb soil on the project site, resulting in potential for soil erosion and loss of topsoil.

The site-specific geotechnical analysis found that the soils encountered within the upper 2.5 to 6.5 feet at all of the boring locations possess a highly disturbed appearance, presumably due to the previous agricultural use of the site as well as the removal of citrus trees. Based on their disturbed appearance, these soils are classified as artificial fill. The fill soils are not considered suitable to support the foundations and floor slabs of the proposed buildings due to their variable strengths and densities. Additionally, some of the underlying undisturbed native alluvium within the upper 6 to 12 feet possess loose relative densities, and the results of laboratory testing indicate that some of the soils present within the upper six to eight feet are compressible when loaded, and may collapse when inundated with water.

Based on these considerations, remedial grading is warranted within the proposed building areas in order to remove all of the soils classified as artificial fill and a portion of the underlying native alluvium in order to replace these materials as compacted structural fill. The geotechnical report concluded that it would be beneficial to perform some additional subsurface exploration at the subject site prior to the start of rough grading in order to determine if any significant root masses are remaining at the subject site.

As noted in Section 3, *Air Quality*, the project would be required to comply with SCAQMD Rule 403 regarding incorporation of measures to reduce fugitive dust, which would reduce the potential for construction-related wind erosion (SCAQMD Rule 403(d)(2)). SCAQMD Rule 403 includes requirements for the application of water or stabilizing agents to prevent generation of dust plumes, pre-watering materials prior to the use of tarps to enclose haul trucks, stabilizing sloping surfaces using soil binders until vegetation or ground cover efficiently stabilize slopes, hydroseeding prior to rain, and washing mud and soils from equipment at the conclusion of trenching activities.

Implementation of these measures pursuant to SCAQMD Rule 403 would reduce the potential for project construction to result in substantial wind erosion or loss of topsoil.

Because the project would disturb more than one acre of land, it would be subject to the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) (Construction General Permit) adopted by the SWRCB. Compliance with the permit requires the project applicant to file a Notice of Intent with the SWRCB. Permit conditions require preparation of a project-specific SWPPP, which must describe the site, the facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, construction sediment and erosion control measures, maintenance responsibilities, and non-stormwater management controls. Inspection of construction sites before and after storms is also required to identify stormwater discharge from the construction activity and to identify and implement erosion controls, where necessary.

In addition to the construction-related erosion control measures described above, the geotechnical report includes recommendations such as the existing soils within the areas of any proposed retaining walls and non-retaining site walls should be over excavated to a depth of three feet below foundation bearing grade and replaced as compacted structural fill, as discussed above for the proposed building pad. Any undocumented fill soils within any of these foundation areas should be removed in their entirety. The over excavation areas should extend at least five feet beyond the foundation perimeters, and to an extent equal to the depth of fill below the new foundations. Furthermore, based on the preceding grading recommendations, it is assumed that the new building pads will be underlain by structural fill soils used to replace existing fill and low-density alluvial soils. These new structural fill soils are expected to extend to depths of at least four feet below proposed foundation bearing grade. Based on this subsurface profile, the proposed structures may be supported on conventional shallow foundations. Adherence to the recommendations provided by the technical geological report provided by SoCalGeo (2019a) would result in less than significant impacts related to erosion and loss of topsoil.

LESS THAN SIGNIFICANT IMPACT

- c. *Would the project 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?*

Lateral spreading is the horizontal movement or spreading of soil toward an open face. Lateral spreading may occur when soils liquefy during an earthquake event, and the liquefied soils with overlying soils move laterally to unconfined spaces. Subsidence is the sudden sinking or gradual downward settling of the earth's surface with little or no horizontal movement. Subsidence is caused by a variety of activities, which include, but are not limited to, withdrawal of groundwater, pumping of oil and gas from underground, the collapse of underground mines, liquefaction, and hydro-compaction. According to the technical report prepared by SoCalGeo, CGS has not yet conducted detailed seismic hazards mapping in the area of the subject site. The general liquefaction susceptibility of the site was determined by research of the San Bernardino County Official Land Use Plan, General Plan, Geologic Hazard Overlay. Map FH31 for the Redlands Quadrangle indicates that the subject site is not located within an area of liquefaction susceptibility. Based on the mapping performed by the county of San Bernardino and the subsurface conditions encountered at the boring locations including the lack of a static ground water table, liquefaction is not considered to be a design concern for this project.

Mountain View Industrial Project

As discussed under Checklist Items a.3 and a.4 above, potential impacts associated with landslides and liquefaction would be less than significant due to the adherence to applicable policies and recommendations outlined in the General Plan and the geotechnical report. In addition, pursuant to Chapter 14, of the Redlands Code of Ordinances, the project would comply with CBC requirements, including foundation and structural design standards, thus further limiting impacts related to unstable soils. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

Expansive soils are soils that shrink or swell as water content changes. Highly expansive soils, specifically those with high clay content, can cause damage to structures and roadways. As previously stated in checklist item b. above, some of the underlying undisturbed native alluvium within the upper six to 12 feet possess loose relative densities, and the results of laboratory testing indicate that some of the soils present within the upper six to eight feet are compressible when loaded, and may collapse when inundated with water. Based on these considerations, remedial grading is warranted in the proposed building areas in order to remove all of the soils classified as artificial fill and a portion of the underlying native alluvium in order to replace these materials as compacted structural fill (SoCalGeo 2019a).

The geotechnical analysis found that, although only trace root fibers were encountered at the boring locations, it is unknown whether the root masses were removed with the former citrus trees. If any significant tree root masses are encountered during grading, they should be removed in their entirety, prior to the replacement of any soils as compacted structural fill. It should be noted that the volume loss from any tree root removals would be in addition to any volume loss due to shrinkage from soil compaction. The CBC has been amended, and adopted, as Title 15 of the Redlands Municipal Code, which regulates all building and construction projects within Redlands, to reduce potential hazards related to expansive soils, and other hazardous building condition (Redlands 2019c). The project would need to adequately demonstrate compliance with the CBC and applicable geologic hazards regulations, that reduce or avoid impacts related to erosion, drainage, and expansive soils during grading and landscaping. Given that the soils on the site are not prone to high expansion, and the project would implement foundation and structural design measures required by the CBC and site-specific geotechnical report, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- e. *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*

The project would be connected to the existing Redlands sewer system for wastewater disposal and would not require a septic system. Therefore, the project would not result in impacts associated with soils that are incapable of supporting septic tanks and alternative wastewater disposal systems.

NO IMPACT

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Paleontological resources are the fossil remains or traces of past life forms, including both vertebrate and invertebrate species, as well as plants. These resources are found in geologic strata conducive to their preservation, typically sedimentary formations. According to the Redlands General Plan, some locations in the Redlands, especially San Timoteo Canyon, have been known to contain paleontological resources (Redlands 2017c). The County of San Bernardino General Plan identifies that major areas of concern for unique geologic features are near the San Andreas fault (County of San Bernardino 2019a). The project site is not located in or near these areas.

Subsurface explorations to depths of 2.5 to 6.5 feet found fill soils that possess a highly disturbed appearance, resulting in their classification as artificial fill. There is low potential for locating significant paleontological resources during grading and trenching within the project area near the soil surface; however, there may be potential increases at greater depth below the surface. Native alluvial soils were encountered beneath the fill soils at all of the boring locations, extending to at least the maximum depth explored of 25 feet (SoCalGeo 2019a). Younger Quaternary Alluvium found in Redlands typically does not contain significant vertebrate fossils in the uppermost layers (ECORP Consulting, Inc. 2018).

The project would require approximately 112,800 cy of cut associated with excavation of the proposed building foundation and tiered landscaping. The proposed development is not expected to include any significant amounts of below-grade construction such as basements or crawl spaces (SoCalGeo 2019a).

The project site has a low likelihood of encountering unique geologic features due to the estimated depth of excavation and the fact that the project site is not situated on any highly sensitive units or areas known to contain paleontological resources. Therefore, impacts to paleontological resources are unlikely and would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
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 type="checkbox"/>	<input checked="" type="checkbox"/>

The analysis in this section is based on the *Air Quality/Greenhouse Gas Analysis for the Duke Warehouse at Mountain View Avenue (Planned Development No. 4)* prepared by Albert A. Webb Associates (2020a; Appendix C).

Climate Change Background

Climate change is the observed increase in the average temperature of the Earth’s atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. Climate change is the result of numerous, cumulative sources of greenhouse gases (GHGs). GHGs contribute to the “greenhouse effect,” which is a natural occurrence that helps regulate the temperature of the planet. Most of the radiation from the Sun hits the Earth’s surface and warms it. The surface in turn radiates heat back towards the atmosphere, known as infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping back into space and re-radiate it in all directions. This process is essential to supporting life on Earth because it warms the planet by approximately 60° Fahrenheit. Emissions from human activities since the beginning of the industrial revolution (approximately 250 years ago) are adding to the natural greenhouse effect by increasing the gases in the atmosphere that trap heat, thereby contributing to an average increase in the Earth’s temperature.

GHGs occur naturally and from human activities. Human activities that produce GHGs are the burning of fossil fuels (coal, oil and natural gas for heating and electricity, gasoline and diesel for transportation); methane from landfill wastes and raising livestock; deforestation activities; and some agricultural practices. GHGs produced by human activities include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Emissions of GHGs affect the atmosphere directly by changing its chemical composition while changes to the land surface indirectly affect the atmosphere by changing the way in which the Earth absorbs gases from the atmosphere. Potential impacts of global climate change in California may include loss of snowpack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years.

Regulatory Framework

California Assembly Bill 32 and California Senate Bill 32

The principal state plan and policy is Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, and the follow up, Senate Bill (SB) 32. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020 and the goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030.

California Senate Bill 375

California SB 375, signed in August 2008, directs each of the State's 18 major Metropolitan Planning Organizations (MPOs) to prepare a Sustainable Communities Strategy (SCS) that contains a growth strategy to meet GHG emission reduction targets. The SCS is included in the Regional Transportation Strategy (RTP). The SCAG RTP/SCS includes a commitment to reduce emissions from transportation sources by promoting compact and infill development to comply with SB 375.

City of Redlands General Plan Update

The General Plan FEIR states that implementation of the General Plan would generate new greenhouse gas emissions, directly and indirectly (Redlands 2017c). However, General Plan policies would help Redlands achieve the goals of SCAG's RTP/SCS, which would contribute to the achievement of SCAG's goal for per capita GHG emissions reductions required by California State Senate Bill (SB) 375. Therefore, the General Plan FEIR concluded that there would be no impacts related to GHGs, and no mitigation measures were required or identified.

While no significant GHG-related impacts have been identified in relation to adoption and implementation of the General Plan, the General Plan includes policies that will further reduce the GHG emissions from individual development projects that take place through 2035. General Plan policies that focus on GHG emissions reductions include:

- **Redlands General Plan Policy 8-P.9**, undertake initiatives to enhance sustainability by reducing the community's GHG emissions.
- **Redlands General Plan Policy 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.

City of Redlands Climate Action Plan

Adopted in December 2017, the Redlands Climate Action Plan (2017) aims to reduce greenhouse gas emissions throughout the year of 2035. The Redlands Climate Action Plan contains GHG-reduction policies for transportation, land use, energy use, water management, and waste reduction and recycling (Redlands 2017c).

Methodology

GHG emissions associated with the project were estimated using CalEEMod, version 2016.3.2, as described under Section 3, *Air Quality*, except for N₂O emissions. Because CalEEMod does not calculate N₂O emissions from mobile sources, N₂O emissions were quantified using guidance from CARB (CARB 2013; see Appendix C for calculations), which states the following:

- For gasoline vehicles, use 4.16 percent of NO_x emissions (from CalEEMod) to calculate N₂O for all gasoline vehicles; and
- For diesel vehicles, use 0.3316 grams of NO_x per gallon fuel used.

CalEEMod does not list the percentage breakdown of gasoline and diesel vehicles used in the model's fleet mixes. To determine this percentage, EMFAC2014 Emissions Inventory were obtained in a spreadsheet output for the Los Angeles County region for the project's operational year (2022), using EMFAC2011 categories. The vehicle population totals for gasoline and for diesel vehicles were separately summed, and the total for each was divided by the overall total vehicles to determine their percentage (Albert A. Webb Associates 2020a).

The percentage of gasoline vehicles was then multiplied by the NO_x emissions output from CalEEMod. This result was then multiplied by the aforementioned 4.16 percent and converted to metric tons to result in MT N₂O per year from gasoline vehicles. For diesel vehicles, the miles per gallon for diesel vehicles was obtained from the EMFAC2014 spreadsheet by dividing the VMT by fuel consumption for each diesel vehicle type, then averaging the miles per gallon for all diesel vehicle types. The miles per gallon was then converted to MT N₂O per year for diesel vehicles through the aforementioned grams of N₂O per gallon and the yearly VMT (multiplied by the percentage of diesel vehicles compared to total vehicles).

Finally, the MT N₂O per year for gasoline and diesel vehicles were added together and converted into CO₂e by using the GWP of N₂O of 265 and then added to the mobile source emissions for CO₂ and CH₄ output in CalEEMod in accordance with direction from the Intergovernmental Panel on Climate Change. Complete CalEEMod results and assumptions can be viewed in Appendix C. Pursuant to SCAQMD Guidance, total construction GHG emissions resulting from the project are amortized over 30 years and added to operational GHG emissions (Albert A. Webb Associates 2020a).

Significance Thresholds

Many individual projects do not generate sufficient GHG emissions to directly influence climate change. However, physical changes caused by a project can contribute incrementally to cumulative effects that are significant, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project's contribution towards an impact would be cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines, Section 15064[h][1]).

GHG are not presented in lbs/day like criteria pollutants; they are typically evaluated on an annual basis using the metric system. Additionally, unlike criteria pollutants, GHG do not have adopted significance thresholds associated with them at this time. Several agencies, at various levels, have proposed draft GHG significance thresholds for use in CEQA documents. SCAQMD has been working on GHG thresholds for development projects. The most recent draft proposal was in September 2010 and included significance thresholds for residential, commercial, and mixed-use projects at 3,500, 1,400, and 3,000 metric tonnes of carbon dioxide equivalents (MTCO₂E) per year (MTCO₂E/yr), respectively. Alternatively, a lead agency has the option to use 3,000 MTCO₂E/yr as a threshold for all non-industrial projects. Although both options are recommended by SCAQMD, a lead agency is advised to use only one option and to use it consistently. In December 2008, the SCAQMD adopted a threshold of 10,000 MTCO₂E/yr for stationary source projects where SCAQMD is

the lead agency. This approach is also widely used by Redlands and various other cities in the South Coast Air Basin. As such, this threshold is utilized herein. The SCAQMD significance thresholds also evaluate construction emissions by amortizing them over an expected project life of 30 years.

Redlands adopted the Redlands CAP and General Plan 2035 in 2017. The CAP’s GHG emission targets and goals are based on meeting the goals in Executive Order B-30 15 and SB 32 and following the CAP guidelines established in CARB’s 2017 Scoping Plan. The CAP includes emissions targets of 6.0 MTCO₂E per capita per year for 2030 and 5.0 MTCO₂E per capita per year for 2035. Redlands’ emissions targets are met in both years 2030 and 2035, with forecast emissions of 4.8 MTCO₂E in 2030 and 4.5 MTCO₂E in 2035. Therefore, implementation of the Redlands General Plan 2035 would enable Redlands to meet the standards outlined in the 2017 Scoping Plan, and implementation of projects consistent with the General Plan would be consistent with the Redlands CAP and therefore would not require additional GHG analysis in accordance with CEQA (Albert A. Webb Associates 2020a).

- a. *Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*

GHG emissions associated with construction emissions and operation emissions from the project are discussed below.

Construction

The CalEEMod model calculates GHG emissions from fuel usage by construction equipment and construction-related activities, like construction worker trips, for the project. The CalEEMod estimate does not analyze emissions from construction-related electricity or natural gas. Construction-related electricity and natural gas emissions vary based on the amount of electric power used during construction and other unknown factors which make them too speculative to quantify. The CalEEMod output results for construction-related GHG emissions present the GHG emissions estimates for the project for CO₂, methane (CH₄), nitrous oxide (N₂O), and CO₂e. Table 12 shows the GHG emissions estimated during the construction phase of the project. When amortized over a 30-year period, construction of the project would generate 50 MTCO₂e per year.

Table 12 Estimated Construction GHG Emissions

Construction Year	Annual Emissions (MTCO₂e)
2020	354.06
2021	1,162.30
Total	1,516.36
Amortized over 30 years	50.71

MTCO₂e = metric tonnes of carbon dioxide equivalents

Source: Albert A. Webb Associates 2020a; Appendix C

Operation

Table 13 combines the construction and operational GHG emissions associated with construction and operation of the project. As shown, annual emissions from the proposed project would be approximately 5,538 MTCO₂e. These emissions would not exceed the 10,000 MTCO₂e per year threshold. Therefore, the project’s GHG emissions would have a less than significant impact.

Table 13 Combined Annual Emissions of Greenhouse Gases

Emission Source	Annual Emissions (MT CO₂e)
Construction	50.71
Operational	
Vegetation	-6.80
Area	0.03
Energy	311.04
Mobile	4,758.05
Solid Waste	75.62
Water	350.11
Net Total	5,538.76
SCAQMD Threshold	10,000
Exceeds Threshold?	No

Notes: Emissions modeling was completed using CalEEMod, except for N₂O mobile emissions. N₂O mobile emissions completed consistent with the description in Methodology.

Source: Albert A. Webb Associates 2020a

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

There are numerous state plans, policies, and regulations adopted for the purpose of reducing GHG emissions. Statewide plans and regulations such as GHG emissions standards for vehicles (AB 1493), the Low Carbon Fuel Standard, and regulations requiring an increasing fraction of electricity to be generated from renewable sources are being implemented at the statewide level; as such, these do not apply to individual development projects. Mandated by SB 32, CARB adopted the 2017 Update to its 2008 Scoping Plan, which is the State’s plan to achieve the 40 percent reduction in GHG emissions from 1990 levels by 2030. Guided by legislative direction, the Scoping Plan identifies actions identified in the reduce overall GHG emissions in California. It notes that transportation, primarily on-road travel, is the single largest source of CO₂ emissions in the State (CARB 2017).

As previously discussed, the SCAG RTP/SCS is the growth strategy and transportation plan for the region, with the purpose to reduce GHG emissions below a certain regional threshold and comply with the provisions of SB 375. The proposed project would not conflict with any of the SCAG’s RTP/SCS goals, as outlined in Table 14. Therefore, the project does not conflict with statewide plans and regulations.

Table 14 Project Consistency with Applicable SCAG 2020-2045 RTP/SCS Strategies

Reduction Strategy	Project Consistency
<p>Focus Growth Near Destinations & Mobility Options</p> <ul style="list-style-type: none"> ▪ Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations ▪ Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets ▪ Plan for growth near transit investments and support implementation of first/last mile strategies. ▪ Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses ▪ Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods ▪ Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations) ▪ Identify ways to “right size” parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking) 	<p>Consistent. The project would be infill development of a new employment center on underutilized land. The project is approximately 0.3 miles from transit, and within walking and biking distance of existing residential, and commercial uses. The project would also develop a segment of a pedestrian and bicycle trail in an urban area to provide new active transportation connections and recreation opportunities.</p>
<p>Promote Diverse Housing Choices</p> <ul style="list-style-type: none"> ▪ Preserve and rehabilitate affordable housing and prevent displacement ▪ Identify funding opportunities for new workforce and affordable housing development ▪ Create incentives and reduce regulatory barriers for building context-sensitive accessory dwelling units to increase housing supply ▪ Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions 	<p>Consistent. The project would provide new employment opportunities for Redlands’ residents and would not impede the development of affordable housing.</p>
<p>Leverage Technology Innovations</p> <ul style="list-style-type: none"> ▪ Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space ▪ Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a “mobility wallet,” an app-based system for storing transit and other multi-modal payments ▪ Identify ways to incorporate “micro-power grids” in communities, for example solar energy, hydrogen fuel cell power storage and power generation 	<p>Consistent. The proposed buildings would be equipped with solar-ready conduits for future photovoltaic panels.</p>

Reduction Strategy	Project Consistency
<p>Support Implementation of Sustainability Policies</p> <ul style="list-style-type: none"> ▪ Pursue funding opportunities to support local sustainable development implementation projects that reduce GHG emissions ▪ Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations ▪ Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space ▪ Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies ▪ Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region ▪ Continue to support long range planning efforts by local jurisdictions ▪ Provide educational opportunities to local decision makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy 	<p>Consistent. The measures to support implementation of sustainability policies are primarily to be undertaken by county and city jurisdictions. However, the project would not prohibit the implementation of citywide sustainability strategies or policies. The project would be consistent with Title 24 and the latest CALGreen requirements. The project’s water consumption would be minimized through the use of low-flow plumbing fixtures, installation of with water-conserving appliances. Furthermore, related to energy production and usage, the project would be equipped would be equipped with low-flow plumbing fixtures, energy efficient HVAC systems, and other features consistent with the 2019 Title 24 standards. The proposed buildings would be equipped with solar-ready conduits for future photovoltaic panels. Therefore, the project would support implementation of sustainability policies.</p>
<p>Promote a Green Region</p> <ul style="list-style-type: none"> ▪ Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards ▪ Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration ▪ Integrate local food production into the regional landscape ▪ Promote more resource efficient development focused on conservation, recycling and reclamation ▪ Preserve, enhance and restore regional wildlife connectivity ▪ Reduce consumption of resource areas, including agricultural land ▪ Identify ways to improve access to public park space 	<p>Consistent. The project includes the development of two industrial (warehouse) buildings with office space, parking, a public trail, and associated site improvements within an existing neighborhood, and would therefore not interfere with regional wildlife connectivity or convert agricultural land. The project would comply with Title 24 and CALGreen building standards. In addition, the project would include a public trail available to project employees and the public. The proposed buildings would be equipped with solar-ready conduits for future photovoltaic panels. Therefore, the project would support development of a green region.</p>

Source: SCAG 2020

The Redlands General Plan and CAP also contain policies that would reduce area-wide levels of GHG emissions under 2035 buildout. Table 15 illustrates the project’s consistency with relevant goals and policies of the Redlands General Plan and CAP.

Table 15 Project Consistency with Applicable General Plan and Climate Action Plan

Goals, Policies, and Actions	Project Consistency
City of Redlands General Plan	
<p>8-A.1 Work with Southern California Edison Company (SCE) and Southern California Gas Company (SCG) to educate the public about the need to conserve energy resources and the higher energy efficiency of new appliances and building materials.</p>	<p>Consistent. The project would not impede this action.</p>
<p>8-A.2 Support San Bernardino County and San Bernardino Associated Governments (SANBAG) in implementation of their energy-related policies.</p>	<p>Consistent. The project would not impede this action.</p>
<p>8-A.3 Leverage and help drive community participation in utility company programs and financial incentives within the City (e.g., one stop information clearinghouse, incentives, on bill financing, etc.).</p>	<p>Consistent. The project would not impede this action.</p>
<p>8-A.5 Accelerate the adoption of solar power and/or other alternative energy usage in Redlands through actions such as: Establishing incremental growth goals for solar power/alternative energy systems in Redlands; Developing guidelines, recommendations, and examples for cost-effective solar and/or other alternative energy-based installation; and Installing solar/alternative energy technology on available City spaces.</p>	<p>Consistent. California Code of Regulations Title 24 building standards, which would improve energy efficiency in new construction, and the proposed buildings would be equipped with solar-ready conduits for future photovoltaic panels.</p>
<p>8-A.6 Complete a cost-benefit analysis for new City energy conservation or renewable energy projects that reviews the costs and benefits of a project over its life cycle to ensure the highest and best use of available funds.</p>	<p>Consistent. The project would not impede this action.</p>
<p>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.</p>	<p>Consistent. The project would be developed approximately 0.3 mile (walking distance) from the OmniTrans Bus Stop, which would allow for easy access to public transportation for project employees to reduce VMT.</p>
<p>8-A.8 Implement and enforce California Code of Regulations Title 24 building standards (parts 6 and 11) to improve energy efficiency in new or substantially remodeled.</p>	<p>Consistent. The project would be constructed in accordance with, California Code of Regulations Title 24 building standards, which would improve energy efficiency in new or substantially remodeled construction.</p>
<p>Policy 8-P.9 Undertake initiatives to enhance sustainability by reducing the community’s GHG emissions.</p>	<p>Consistent. The project would be developed approximately 0.3 mile (walking distance) from the OmniTrans Bus Stop, which would allow for easy access to public transportation for project employees to reduce VMT. The proposed buildings would be equipped with solar-ready conduits for future photovoltaic panels.</p>

Goals, Policies, and Actions	Project Consistency
<p>Policy 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.</p>	<p>Consistent. The project would comply with all requirements of the 2019 Title 24 standards. Sustainable design measures proposed by the project applicant include water efficient irrigation system, low-flow plumbing fixtures, energy efficient HVAC systems, and implementation of a construction and demolition waste management plan. The proposed buildings would be equipped with solar-ready conduits for future photovoltaic panels.</p>
City of Redlands Climate Action Plan	
<p>Policy 8-A.45 Prepare a Climate Action Plan to ensure that the Planning Area complies with State-mandated GHG emissions.</p>	<p>Consistent. The project’s potential GHG emissions would be under the threshold of the Redlands CAP.</p>
<p>Policy 8-A.46 Continue to monitor the City’s compliance with State-mandated GHG emissions, as provided for in the Climate Action Plan. Make timely adjustments to City policies as required to continue meeting State GHG targets, and as changes in technology, federal and State programs, or other circumstances warrant.</p>	<p>Consistent. The project’s potential GHG emissions would be under the threshold of the Redlands CAP.</p>
<p>Policy 8-A.47 Demonstrate City leadership by giving preference to or providing incentives for climate-friendly purchasing.</p>	<p>Consistent. The project would not impede this action.</p>
<p>Policy 8-A.48 Support a regional approach to study the feasibility of establishing Community Choice Aggregation (CCA) or another program that increases the renewable energy supply and maintains the reliability and sustainability of the electrical grid.</p>	<p>Consistent. The project would not impede this action.</p>
<p>Source: Redlands 2017c</p>	

As shown above, the project is consistent with state and local policies for reducing GHG emissions, including the Redlands General Plan, Climate Action Plan, and the SCAG 2020 RTP/SCS. Therefore, the project would not conflict with an applicable plan, policy, or regulation and no impact would occur.

NO IMPACT

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9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
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 0.25 mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located in 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 type="checkbox"/>	<input checked="" type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Regulatory Framework

The transport, use, and storage of hazardous materials is regulated by federal, state, local laws and regulatory agencies.

Federal Regulations

The 1975 Hazardous Materials Transportation Act (HMTA) is the principal federal law in the United States regulating the transportation of hazardous materials. It is in the Secretary of Transportation's authority to designate material or a group or class of material as hazardous when they meet the definition of hazardous material under the HMTA. A hazardous material is any particular quantity or form of a material that may pose an unreasonable risk to health and safety or property during transportation in commerce, which includes materials that are explosive, radioactive, infectious, flammable, toxic, oxidizing, or corrosive. The law establishes minimum standards of regulation for the transport of hazardous materials by air, ship, rail, and motor vehicle. The HMTA is implemented through various agencies based on the mode of transportation and the type of hazardous material being transported (U.S. Government Publishing Office 2011).

The 1976 Resource Conservation and Recovery Act (RCRA) gives USEPA the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. USEPA-administered permits are required for generators and transportation, storage and disposal facilities. Compliance monitoring involves reviewing a facility's compliance with the requirements of its permit and with the regulations applicable to the facility type. Management of used motor oil and oil filters, which may be generated from use of construction vehicles, is regulated by storage standards established by the RCRA. USEPA and its regulatory partners conduct inspections of recycled used oil facilities to assure compliance with applicable regulations (USEPA 2018b).

State Regulations

The California Fire Code, (CCR, Title 24] requirements prescribe safe accommodations for materials associated with the construction of new buildings that present a moderate explosion hazard, high fire or physical hazard, or health hazards. Hazardous materials are required to be stored in designated areas designed to prevent accidental release to the environment [California Building Standards Commission (CBSC) 2016].

Under CCR, Title 22, hazardous wastes must be disposed of only at State-permitted treatment, storage, or disposal facilities and cannot be disposed of in the regular trash, onto the surface of the ground, or into the storm drain. In addition, they may not be dumped into the sewer system without an industrial waste discharge pretreatment permit from the local sewer agency for that specific waste, and properly treated first before discharge. Hazardous wastes must be transported only by California Registered Hazardous Waste Transporters. These transporters must be registered by the California Department of Toxic Substances Control (DTSC) and California Highway Patrol (DTSC 2019).

Pursuant to the Emergency Services Act, California developed an Emergency Response Plan to coordinate emergency services provided by federal, State, and local governmental agencies and private persons. Response to hazardous materials incidents is one part of this plan. The plan is administered by the State Office of Emergency Services (Cal OES). Cal OES coordinates the responses of other agencies, including the USEPA, CHP, CDFG, RWQCBs, the local air pollution control districts, and local agencies (Cal OES 2019).

The State of California Division of Occupational Safety and Health (Cal/OSHA) has regulations concerning the use of hazardous materials, including requirements for safety training, availability of safety equipment, hazardous materials exposure warnings, and emergency action and fire prevention plan preparation. Cal/OSHA enforces the hazard communication program regulations, which include provisions for identifying and labeling hazardous materials, describing the hazards of chemicals, and documenting employee-training programs (California Department of Industrial Relations 2019).

Local Regulations

The Certified Unified Program Agency (CUPA) is an agency certified by the DTSC to regulate hazardous waste generators and onsite treatment programs; aboveground and underground storage tank programs; Hazardous Materials Management, Business Plans, and Inventory Statements; and the Risk Management and Prevention Program. The San Bernardino County Fire Department (SBCFD), Hazardous Materials Division (HHMD) is the CUPA responsible for administering hazardous materials programs in San Bernardino County. The SBCFD HHMD personnel respond to hazardous materials incidents in Redlands (SBCFD 2020).

General Plan Actions 7-A.83 through 7-A.106 monitor and guide fire prevention and safety to minimize risk. Action 7-A.117 requires use of the Local Hazard Mitigation Plan and Emergency Operations Plan to address issues related to seismic hazards, including hazardous materials incidents, hazardous buildings, critical facilities (i.e., schools, hospitals), and emergency response preparedness and recovery. Actions 7-A.119 through 7A.124 address emergency preparedness and minimizing risk due to fuel lines, utility lines and substations, hazardous contamination of soil and groundwater, and prohibits hazardous air emissions within 0.25 mile of schools (Redlands 2017a).

Section 13.54 of the Redlands Code of Ordinances contains Redlands' policies intended to reduce pollutants in stormwater, including materials that may be harmful to people and the environment. The section requires any construction contractors performing work in Redlands to provide filter materials at the catch basin of the storm sewer system to retain debris and dirt. The section further requires projects subject to the NPDES Construction General Permit to demonstrate possession of the permit prior to issuance of a grading or building permit and prohibits unpermitted discharge of any storm water or other matter directly or indirectly into the storm drain system.

Section 8.04.040 of the Redlands Code of Ordinances prohibits materials and conditions that constitute a fire hazard, result in refuse, waste matter, polluted water and sewage on the ground, dangerous or infested trees, dangerous buildings or infrastructure, and smoke and soot (Redlands 2019c).

The following are applicable goals and policies pertaining to hazards as identified in the Specific Plan:

- EV4.0225(b)(5) Every use shall be so operated that there is no emission of toxic, noxious or corrosive fumes of gases.
- EV4.0225(b)(7) Every use shall be operated so that there is no dangerous amount of radioactive emissions.
- EV4.0225(b)(7) Every use shall be consistent with the provisions of the San Bernardino County Hazardous Waste Management Plan.

- a. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*
- b. *Would the project 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?*

Construction-Related Impacts

During project construction, accidental conditions could occur as a result of any of the following: direct dermal contact with hazardous materials; incidental ingestion of hazardous materials, or inhalation of airborne dust released from dried hazardous materials. The transportation of hazardous materials could result in accidental spills, leaks, toxic releases, fire, or explosion. Limited quantities of hazardous substances, such as gasoline, diesel fuel, hydraulic fluid, solvents, and oils would be used to fuel and maintain vehicles and motorized equipment. Appropriate documentation for all hazardous waste that is transported, stored, or used in connection with specific project-site activities would be provided as required for compliance with existing hazardous materials regulations codified in the CCR. Adherence to existing hazardous materials regulations would provide compliance with existing safety standards related to the handling, use and storage of hazardous materials, and compliance with the safety procedures mandated by applicable federal, State, and local laws and regulations.

The Phase I Environmental Site Assessment (ESA) (Apex 2019) identified potential for the site to contain hazardous materials, given its prior agricultural use. The ESA also identified potential contamination associated with a former petroleum release and cleanup. Given the potential for contaminated soils on the project site, there is a possible hazard for construction workers to be exposed to contaminants via dust on the project site. There is also a concern for potential off-site disposal of soils that may occur during project construction.

Given the potential presence of residual pesticides and other contaminants on site, a Phase II ESA investigation was conducted to further characterize the concentration and distribution of these potential components on the project site (Apex 2020). All detections of the contaminants analyzed in the Phase II ESA were screened against the San Francisco Regional Water Quality Control Board environmental screening levels (ESLs). These ESL's are risk-based screening levels for direct exposure of a construction worker under various depth and land use scenarios.

- Total Petroleum Hydrocarbons (TPHs) were detected in all six samples analyzed with a maximum concentration of 555.5 milligrams per kilogram (mg/kg) in the diesel range (C₉-C₂₅) and 5,280 mg/kg in the oil range (C₂₄-C₄₄). All TPH detections were below their respective ESL's of 1,100 mg/kg for TPH-diesel and 54,000 mg/kg for TPH-motor oil. TPH in the gasoline range was not detected in the samples analyzed.
- Volatile organic compound (VOC) and fuel oxygenates analyses detected two compounds in the samples analyzed. Benzene was detected in four samples at a maximum concentration of 0.0040 mg/kg, and acetone was detected in three samples at a maximum concentration of 0.39 mg/kg. No other VOCs or oxygenates were detected in the samples analyzed. The benzene and acetone detections were below their respective ESL's or 33 mg/kg and 270,000 mg/kg.
- Metals analyses detections were below their applicable screening levels, with the exception of arsenic. Arsenic was detected in two of the 18 agricultural use area samples at a maximum concentration of 1.1 mg/kg, which is above the ESL of 0.98 mg/kg, yet below regional background concentrations of 11 mg/kg.

- Trace concentrations of two organochlorine pesticides (OCPs) were detected in 10 of the samples analyzed. Dichlorodiphenyldichloroethylene (4,4'-DDE) was detected in 10 samples at a maximum concentration of 0.14 mg/kg. Dichlorodiphenyltrichloroethane (4,4'-DDT) was detected in six of the samples at a maximum concentration of 0.032 mg/kg, and dieldrin was detected in two of the samples analyzed at a maximum concentration of 0.010 mg/kg. All detected concentrations of OCPs are below their respective ESL's of 57 mg/kg for DDE and DDT, and 1.1 mg/kg for dieldrin). No other OCPs were detected in the samples.

Based on the results of the Phase II ESA, there is a potential for low concentrations of TPH (diesel and motor oil), benzene, acetone, arsenic, DDE, DDT, and dieldrin to be encountered during grading and construction related work onsite. Although onsite TPH concentrations were below ESLs at the two boring locations analyzed for TPH, the full extent and source of TPH impacted soil onsite is unknown. Given the potential for TPH contaminated soils to be present along the northern portion of the project site, there is a possible hazard for construction workers to be exposed to contaminants via dust on the project site. In addition, if off-site disposal of soils will occur during project construction, the soil may require special handling or disposal as a waste.

Consequently, potentially significant impacts involving the routine transport, use, or disposal of hazardous materials and/or reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment could occur. Implementation of Mitigation Measure HAZ-1 during project construction would reduce potential petroleum hydrocarbon exposure impacts to a less than significant by providing direction on how to properly address petroleum hydrocarbon investigation or remedial measures, transportation of impacted materials, and/or soil management practices to ensure construction worker safety and the health of future workers and visitors.

Operation-Related Impacts

Future tenants for the proposed project facilities are unknown. Generally, maintenance and upkeep of facilities on-site, including cleaning of workspaces, parking areas, restroom facilities and maintenance of landscaping occasionally require the use of various solvents, cleaners, paints, oils/fuels, and pesticides/herbicides. Transport, use, and storage of hazardous materials during the construction and operation of the site would be conducted pursuant to all applicable local, State, and federal laws, including but not limited to Title 49 of the Code of Federal Regulations implemented by CCR Title 13, which describes strict regulations for the safe transportation of hazardous materials, and in cooperation with the County's Department of Environmental Health. As required by California Health and Safety Code Section 25507, a business shall establish and implement a Hazardous Materials Business Emergency Plan for emergency response to a release or threatened release of a hazardous material. As required, the hazardous materials would be stored in locations according to compatibility and in storage enclosures (i.e., flammable material storage cabinets and biological safety cabinets) or in areas or rooms specially designed, protected, and contained for such storage, in accordance with applicable regulations.

Under the California Hazard Communication Regulation, chemical manufacturers, distributors, or importers must provide Safety Data Sheets (formerly Material Safety Data Sheets) for each hazardous chemical to downstream users to communicate information on these hazards. All businesses of more than ten employees must comply when employees may be exposed to hazardous substances found in the workplace under normal conditions of use as well as in reasonably foreseeable emergency conditions (i.e., a spill or release of a flammable chemical).

Businesses are also required to train employees on protocols in the event of a chemical spill or a leak from a sealed container (California Department of Industrial Relations 2012).

Adherence to Redlands and San Bernardino County Department of Public Health plans and regulations would reduce the potential for contamination from hazardous materials through proper cleanup, disposal, and remediation. The Hazardous Materials Division of the San Bernardino County Fire Department (CSBFD) regulates and enforces the provisions of the Uniform Fire Code relating to hazardous materials, including the use and storage of hazardous materials that are ignitable, reactive, corrosive, or toxic. Businesses using such materials are subject to permitting and inspection (CSBFD 2020). Therefore, impacts due to reasonably foreseeable upset and accident conditions during operation of the project would be less than significant.

Potential hazardous materials, such as fuel, paint products, lubricants, solvents, and cleaning products, may be used and/or stored on-site during the construction of the proposed project. However, due to the limited quantities of these materials to be used by the project, they are not considered hazardous to the public at large. Impacts associated with project operation would be less than significant.

Mitigation Measure

HAZ-1 Soil Management Plan for Impacted Soils

A Soil Management Plan (SMP), or equivalent document shall be prepared by a qualified environmental consultant to address onsite and handling and management of soils and reduce hazards to construction workers and off-site receptors.

The plan must establish remedial measures and/or soil management practices to ensure construction worker safety, the health of future workers and visitors, and the off-site migration of contaminants from the site. The Plan should provide guidance regarding the onsite handling and management of impacted soils.

If odorous or visually stained soils, other indications of hydrocarbon piping or equipment, or debris are encountered during ground-disturbing activities, work in the immediate area shall be halted and a qualified environmental consultant shall be contacted immediately to evaluate the situation. Work may continue on other parts of the project site while impacted soil investigation and/or remediation takes place.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- c. *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?*

The project site is 0.23 mile north of Redlands KinderCare at 10451 Commerce Street. Potential uses of hazardous materials would be site-specific and limited to the physical boundaries of the project site. Redlands General Plan Policy 7-A.124 prohibits the development of projects that would reasonably be anticipated to emit hazardous air emissions or handle extremely hazardous substances within a quarter mile of a school (Redlands 2017a). The project does not include elements or aspects that would create or otherwise result in hazardous emissions that would affect this or other schools.

Furthermore, individual users of hazardous materials would continue to be regulated by local disclosure, permitting, and notification requirements of the "Disclosure of Hazardous Materials"

program consistent with all federal, State, and local laws. Public schools are also required to evaluate and potentially amend their school safety plan on an annual basis. In the case that new schools or alterations to existing schools would be required in the future, the siting of schools, including existing facilities and upgrading construction projects, would be regulated by the California Department of Education; and new facilities would not be constructed within a quarter mile of facilities emitting or handling materials consistent with California Department of Education requirements. There would be no impact.

NO IMPACT

- d. *Would the project be located on a site that is included on a list of hazardous material 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?*

As part of the Phase I ESA report (Apex 2019) conducted for the project site, a search of federal, state, and tribal environmental record sources within the established minimum search distances was conducted pursuant to Section 65962.5, in addition to local regulatory agency records; see *Standard and Additional Environmental Record Sources* of the ESA (Apex 2019; Appendix G). The project site is not listed in any of the environmental databases. There are several listings for off-site facilities within the applicable search radii. Several of these listings (i.e., small quantity hazardous waste generators, registered and historical underground storage tanks [USTs], land disposal sites) are not indicative of a contamination concern.

One listing on databases indicating potential contamination concerns is located within 0.5-mile of the project site: Loma Linda Oil Corporation at 1880 Mountain View Ave in Loma Linda, located at the northwest corner of Mountain View Avenue and I-10. Five rounds of high-vacuum vapor extraction were conducted, and a total of 1,286 pounds of hydrocarbons were removed. Groundwater was not found to be impacted. Site closure was granted on August 19, 2005. Given the location of this listing, groundwater flow direction and the closed case status, this property is not considered a Recognized Environmental Condition (REC) and would not impact the project site. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- 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?*

The compatibility of existing and planned land uses in the vicinity of an airport is usually associated with the extent of the airport's noise impacts. Typically, significant impacts will occur over noise-sensitive areas in the 65 Community Noise Equivalent Level (CNEL) noise contour, based upon the Federal Aviation Administration's (FAA) Integrated Noise Model, which describes aircraft noise in either the Yearly Day-Night Average Sound Level (DNL) or the CNEL. DNL accounts for the increased sensitivity to noise at night (10:00 p.m. to 7:00 a.m.) and is the metric preferred by the FAA. The DNL represents the total accumulation of all sound energy but spread out uniformly over a 24-hour period.

The nearest airport to the project site is San Bernardino International Airport, located approximately 1.9 mile to the north. According to the Airport Layout Plan Narrative Report for the San Bernardino International Airport, the project site is located outside the ultimate 65 CNEL noise exposure contour noise contours for the airport upon its planned build-out based on 2030 forecast conditions

(San Bernardino International Airport Authority 2010). Therefore, the project site is not located in an area of with noise over 65 CNEL and would not expose employees or visitors to excessive noise.

The project site is in the AR3 Zone – Airport Safety Review Area as identified by the San Bernardino County General Plan EIR (County of San Bernardino 2019b). For a public use airport with adopted noise contours, the AR3 Zone is the area within one mile outside the 65 DNL noise contour, which encompasses the boundaries prescribed in Federal Aviation Regulation (FAR) Part 77 that depict imaginary surfaces for "objects affecting navigable airspace," as applicable to the specific FAA-approved Airport Layout and Approach Plan. Imagery surfaces are the Approach Surface, Horizontal Surface, and the Conical Surface that extend a specific distance from the airport (San Bernardino County 2007a).

The project would comply with Redlands Municipal Code Section 18.132, and provide for buildings height, compatible with airport flight zones. The project would also be required to comply with Redlands General Plan Policy 7-A.123, which requires Redlands to limit hazards to and from flight operations due to land uses within the San Bernardino International Airport influence area, and Policy 7-A.126, which requires review all projects within the Compatibility Zones established by the San Bernardino International airport for conformity to the criteria set forth in the California Airport Land Use Planning Handbook and coordination with the airport on any future revisions to its compatibility standards (Redlands 2017a).

The FAA conducted an aeronautical study for the project under the provisions of 49 U.S.C., Section 44718, which revealed that the proposed structures would not exceed obstruction standards and would not be a hazard to air navigation and that marking and lighting would not be necessary for aviation safety (No. 2020-AWP-7409-OE, FAA 2020). This determination included temporary construction equipment such as cranes, derricks, etc., as long as the equipment would not exceed the heights, frequencies, and power specified by the FAA (FAA 2020).

Therefore, the project would be compatible with the Airport Layout Plan Narrative Report for the San Bernardino International Airport and would not result in a safety hazard or excessive noise for people working in the project area.

LESS THAN SIGNIFICANT IMPACT

- f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The project would be required to comply with applicable Redlands codes and regulations pertaining to emergency response and evacuation plans maintained by the Redlands police and fire departments.

Redlands implements the Redlands Emergency Operations, Continuity of Operations, and Hazard Mitigation plans. The Redlands Hazard Mitigation Plan (HMP) was prepared in accordance with 44 Code of Federal Regulations (44 CFR Parts 201 and 206), and is the plan for preventing, reducing, and eliminating risk in Redlands. The HMP process encourages communities to engage community stakeholders to develop goals and projects that will reduce risk and build a more disaster resilient community by analyzing potential hazards (Redlands 2015). Additionally, Redlands' Emergency Operations Manager is a member of the planning team engaged in updating the County of San Bernardino Multi-Jurisdictional HMP, which identifies hazards, mitigation efforts, and emergency preparedness planning in the County (County of San Bernardino 2017).

Emergency Management in Redlands is coordinated within the Redlands Fire Department (RFD). Emergency services in Redlands are provided by the following groups:

- The Community Emergency Response Team Program educates people about disaster preparedness for hazards that may impact their area and trains them in basic disaster response skills, such as fire safety, light search and rescue, team organization, and disaster medical operations.
- Redlands Emergency Communications Groups are responsible for redundant emergency communications and provides supplemental communication assistance to Redlands agencies in the event of a disaster, emergency, or other designated event.
- The Redlands Disaster Council develops and recommends emergency and mutual aid plans and agreements for adoption by the city council. The council consists of existing groups from various sectors of the community, including elected officials, emergency management, first responders, volunteer services, major industry, commercial, healthcare, and education.
- San Bernardino County Voluntary Organizations Active in Disaster and the local San Bernardino County East End Community Organizations Active in Disaster coordinate the deployment of resources to improve outcomes for people affected before, during, and after a disaster (Redlands 2017a).

The Redlands General Plan (2017a) contains policies to guide implementation of emergency response plans and coordination:

- **Principle 7-P.37** directs the City to use the Redlands Local Hazard Mitigation Plan and Emergency Operations Plan as the guides for disaster planning in the Redlands Planning Area.
- **Action 7-A.127** identifies the Redlands Local Hazard Mitigation Plan as the guide for identifying hazard risks and vulnerabilities, identifying and prioritizing mitigation actions, encouraging the development of local mitigation, and providing technical support for these efforts.
- **Action 7-A.128** directs the City to update and revise the Local Hazard Mitigation Plan and Emergency Operations Plan as needed to reflect changes in the Planning Area and in emergency management techniques, including specific local hazards that may not be included in the plan.
- **Action 7-A.129** directs the City to maintain and update the City's Emergency Plan, as required by State law.
- **Action 7-A.130** requires the City to maintain ongoing emergency response coordination with surrounding jurisdictions.
- **Action 7-A.131** requires all City staff to be adequately trained to respond to emergency situations and conduct regular emergency preparedness drills with local organizations including the City's Fire, Police, Quality of Life, Emergency Management, and Municipal & Utilities Engineering departments.

No roads would be permanently closed as a result of the construction or operation of the project, and no structures would be developed that could potentially impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The two warehouse buildings would be accessed from Mountain View Avenue, which would provide sufficient capacity for passenger vehicles and light- and heavy-duty trucks that would frequent the project site during construction and operation. No structures would be developed that could potentially impair implementation of or physically interfere with an adopted emergency response

plan or emergency evacuation plan. The project would be developed in accordance with applicable geotechnical, hazardous materials, transportation, and fire safety standards.

The project would comply with Section 12.20.140 of the Redlands Municipal Code, which states that no lane closures in excess of six hundred feet will be allowed, and that a minimum of one lane of travel in each direction shall be maintained on all arterial streets crossing the excavation. One lane of travel may be allowed for local and minor streets, provided appropriate flagging procedures are used. Additionally, access to local businesses must be maintained at all times. It is unlikely that residential streets near the project would be impacted.

If there are temporary lane closures during project construction (potentially on Mountain View Avenue), construction activities would avoid interference with an emergency plan through the use of traffic control measures to maintain traffic flow and access and/or road detours. Due to the temporary nature of project construction and the use of traffic control measures to avoid interference with an emergency plan, potential impacts from project construction would be less than significant.

In addition, as discussed in Section 17, *Transportation*, the project would not have a significant impact on any area intersections that would be used for emergency access or evacuation. As such, implementation operation of the project would not interfere with existing emergency evacuation plans or emergency response plans in the area. Therefore, the operation of the project would not result in any impacts to emergency response or evacuation plans.

NO IMPACT

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

The project would not be located in or near a California Department of Forestry and Fire Protection (CAL FIRE) recommended Very High Fire Hazard Severity Zone (VHFHSZ) or (State Responsibility Area) SRA. Site access for the project would be provided via Mountain View Avenue. As discussed in Section 17, *Transportation*, the project would not impede access to emergency services. The project would be designed, constructed, and operated pursuant to applicable standards outlined in the 2016 California Fire Code, as amended by Redlands and adopted in Chapter 15.20 of the Redlands Code of Ordinances. Such requirements include building and emergency access, adequate emergency notification, and means of egress for emergency vehicles. Additionally, the project would not be situated near slopes or create slopes, and would adhere to applicable standards outlined in the 2016 California Fire Code, as amended by Redlands to increase prevention and protection efforts due to impacts from the "Santa Ana" winds and other conditions that may increase the propensity and intensity of wildfires.

While project construction may require temporary construction near Mountain View Avenue and truck and equipment access and parking on the project site, construction would not permanently or temporarily impair emergency response or evacuation.

The project would not create a significant risk of loss, injury, or death involving wildfires, and this impact would be less than significant. For more discussion of potential impacts related to wildfire, please refer to Section 20, *Wildfire*.

LESS THAN SIGNIFICANT IMPACT

10 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site is located in the South Coast Hydrologic Region, which covers approximately 10,600 square miles of southern California watersheds draining to the Pacific Ocean. The South Coast Hydrological Region includes all of Orange County, most of San Diego and Los Angeles Counties, and parts of Riverside, San Bernardino, and Ventura Counties. The region is bound by the Transverse Ranges (including the San Gabriel and San Bernardino Mountains) to the north, the San Jacinto Mountains and low-lying Peninsular Range to the east, and the international boundary with Mexico to the south (California Department of Water Resources [DWR] 2003). The Redlands area has a Mediterranean climate, with moderate to warm summers and mild winters. The area receives an average of 13 to 14 inches of rainfall annually (Redlands 2017c).

Surface Water Resources and Drainage

The project site is located in the Upper Santa Ana River Watershed of the 2,650-square mile Santa Ana Watershed. The Upper Santa Ana River Watershed Integrated Regional Water Management Region covers 852 square miles of the entire Santa Ana River watershed (approximately 32 percent of the watershed) and is primarily located in San Bernardino and Riverside Counties. The Santa Ana River watershed covers widely varying forested, rural, and urban terrain and the more populated urban areas of San Bernardino, Riverside, and Orange Counties, as well as a lesser portion of Los Angeles County (County of Riverside 2017). The Upper Santa Ana River watershed consists of many tributaries flowing to the Santa Ana River, which discharges into the Prado Basin. These tributaries exhibit a range of development from natural streams to concrete-lined channels. Many of the streams flow through heavily developed areas. The SBCFCD operates and maintains many of the tributary systems that are deemed regional (San Bernardino Valley Municipal Water District [SBVMWD] 2015). The Mission Zanja flood control channel is adjacent to the eastern boundary of the project, and discharges into Reach 5 of the Santa Ana River west of Tippecanoe Avenue in San Bernardino. Figure 8 shows the Mission Zanja flood control channel as the only surface water feature in the vicinity of the project site.

The project site is under the jurisdiction of the Santa Ana RWQCB (Region 8). The Santa Ana RWQCB sets water quality objectives and monitors surface water quality through the implementation of the Water Quality Control Plan for the Santa Ana Region (Basin Plan), which was last updated in 2019 (Santa Ana RWQCB 2020).

Groundwater Resources

Groundwater consists of water within underground aquifers that is recharged from the land surface. The rate of groundwater recharge is affected by the permeability of the ground surface. The project site is in the Upper Santa Ana Valley – San Bernardino groundwater basin (Bunker Hill subbasin), which is characterized by flow paths that originate along the mountain front and converge to a focused discharge area. The Bunker Hill subbasin is bounded by the San Bernardino Mountains and the San Jacinto Fault Zone in the northeastern part of the Inland Basin. It has a large mountain drainage area that contributes water to the subbasin. The sediments in the Bunker Hill subbasin generally consist of coarse-grained unconsolidated alluvial fan and stream deposits near the mountain fronts that become layered with finer grained material further away from the mountains. Sources of recharge to the basin-fill aquifer in the Bunker Hill subbasin under modern conditions are primarily infiltration of streamflow along the mountain front and infiltration of excess water used for irrigation and public supply. The Seven Oaks Dam on the Santa Ana River, completed in 1999, allows for additional recharge of streamflow in the Bunker Hill subbasin.

Figure 8 Surface Water Features



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Additional data provided by U.S. Fish & Wildlife Service, NWI, 2020.

Fig 7 Surface Water

Pumped groundwater in the Bunker Hill subbasin is used for agricultural, municipal, and industrial purposes (U.S. Geological Survey [USGS] 2010). Redlands domestic water wells constitute about 50 percent of the water supply for Redlands (Redlands 2017c). Groundwater quality is regularly monitored and reported to the Santa Ana RWQCB.

- a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

Construction activities associated with the project would have the potential to generate soil erosion and to increase sediment and other pollutant loads in stormwater runoff. Further, operation of the proposed project would increase impervious surface area on the project site, which can result in increased runoff and degraded water quality. Construction-related and operational impacts associated with the project are discussed below.

Construction

Grading, excavation, and other construction activities associated with the project could adversely affect water quality due to erosion resulting from exposed soils and the generation of water pollutants, including trash, construction materials, and equipment fluids. Soil disturbance associated with site preparation and grading activities would result in looser, exposed soils, which are more susceptible to erosion. The geotechnical analysis by SoCalGeo found that the top layer of soils on the project site are previously disturbed alluvium soils, and it is recommended that these soils be removed during project site grading (SoCalGeo 2019a).

Additionally, spills, leakage, or improper handling and storage of substances such as oils, fuels, chemicals, metals, and other substances from vehicles, equipment, and materials used during project construction could contribute to stormwater pollutants or leach to the subsurface.

Because the project would result in disturbance of more than one-acre, on-site construction activities would be subject to the NPDES Construction General Permit, as described in Section 7, *Geology and Soils*. The Redlands Storm Water Program implements the NPDES program consists of business and construction inspections, program compliance reporting, record keeping, educational outreach, studies and reports, and storm water monitoring activities. For all covered projects, the NPDES construction permit requires visual monitoring of stormwater and non-stormwater discharges, sampling, analysis, and monitoring of non-visible pollutants, and compliance with all applicable water quality standards established for receiving waters potentially affected by construction discharges. Additionally, construction site operators would be responsible for preparing and implementing a SWPPP that outlines project-specific best management practices (BMPs) to control erosion, sediment release, and otherwise reduce the potential for discharge of pollutants in stormwater. Typical BMPs include use of temporary de-silting basins, construction vehicle maintenance in staging areas to avoid leaks or spills of fuels, motor oil, coolant, and other hazardous materials, and installation of silt fences and erosion control blankets.

Furthermore, Section 13.54.180 of the Redlands Municipal Code contains Redlands' policies intended to reduce construction-based pollutants in stormwater. The section requires construction activity shall use BMPs to prevent the discharge of pollutants to the maximum extent practicable. The section further requires projects subject to the NPDES Construction General Permit to demonstrate possession of the permit prior to issuance of a grading or building permit. Implementation of construction BMPs would minimize surficial erosion and transport of pollutants and would occur in compliance with applicable NPDES and City requirements, thereby protecting

water quality both on- and off-site. Therefore, water quality impacts from construction would be less than significant.

Operation

The project would increase impervious surface cover on the project site due to the construction of the two warehouse buildings, parking area, and driveways. The project would construct 758,387 square feet of new impervious area on the existing site. Increased impervious area on the project site could result in increased runoff flow and volume, which can carry pollutants to downstream water bodies and adversely affect water quality. Common pollutants associated with commercial and industrial development that could be discharged during operation of the project include automotive chemicals and metals that accumulate on the driveways and parking areas; fertilizers, pesticides, and herbicides applied to ornamental landscaping; trash; debris; and sediments.

Redlands is a permittee to the Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges to the portion of the Santa Ana River watershed of San Bernardino County (Order No. R8-2010-0036, NPDES Permit Number CAS 618036) issued by the Santa Ana RWQCB. Under the MS4 permit, permittees, including Redlands, must require the use of control measures, such as BMPs, to reduce the discharge of pollutants from their MS4 facilities to receiving water bodies. Section 13.54.180 of the Redlands Municipal Code requires any new industrial or commercial or other development activity, or development, to use BMPs or other steps to prevent discharge of pollutants to the MS4. All BMPs included as part of the project water quality management plan (WQMP) are required to be maintained through regular scheduled inspection and maintenance. Non-structural and structural source control BMPs are required to be incorporated into all new development and significant redevelopment projects. This ordinance requires all commercial, industrial, and construction sites that employ pollution prevention BMPs to submit a yearly report to Redlands Municipal Utilities and Engineering Department detailing inspection dates, any maintenance performed, and any repairs that were made to the BMPs. Project-specific BMPs are described in full in the Preliminary WQMP (Albert A. Webb Associates 2020d; included in Appendix H).

Section 15.54.160 of the Redlands Municipal Code requires development projects to adhere to applicable City or regional water quality control board ordinances and stormwater management plans. Because the project would result in the creation, addition, or replacement of 10,000 square feet or more of impervious surface area on the site, it would constitute a new development project subject to design and implementation of post-construction stormwater controls. As part of the project's final design review, the project would be required to submit a Standard Urban Stormwater Mitigation Plan (SUSMP) demonstrating that the project would retain all runoff from the 85th percentile, 24-hour rain event. Based on the preliminary WQMP provided by the applicant, the project would be required to retain a runoff volume of approximately 73,919 cubic feet associated with a 0.95 inch, 24-hour rainfall event. The project would maximize the landscaped areas, consistent with Redlands' requirements. Redlands requires 15 percent of the overall development area to be landscaped, but the project would allocate approximately 22 percent to landscaping (Albert A. Webb Associates 2020).

According to the drainage study for the project, the project site is not impacted by off-site flows as there are existing streets around the perimeter of the project that convey any offsite flow away from the site. On-site flows generated by the proposed project would surface flow through the site utilizing ribbon gutters, curb and gutters, and grate inlets. The project proposes three subsurface

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storm drain lines that would be used to collect and convey runoff generated by the project site to the proposed on-site infiltration basin near the middle of the site along the easterly property line. Once water quality treatment is detained, excess runoff will outlet into the existing Mission Zanja flood control channel. The proposed basin would serve to treat water quality requirements and to mitigate for a two-year 24-hour storm event. The infiltration basin would propose an outlet structure to allow any excess runoff above the required water quality volume to exit the site. In the event of failure or improper maintenance of the infiltration basin, the outlet structure would also serve as an emergency spillway using grates at the top of the structure. The proposed basin would provide adequate water quality treatment and drawdown within 48 hours and will not impact flooding condition to upstream or downstream properties (Albert A. Webb Associates 2020e).

Stormwater plans would be subject to review and approval by the City Engineer. The requirements of the applicable City ordinances and MS4 permit is intended to protect water quality and support attainment of water quality standards in downstream receiving water bodies. Therefore, operation of the project would not violate any water quality standards or waste discharge requirements, nor would it otherwise substantially degrade water quality. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

As discussed above, the project site overlies the Upper Santa Ana Valley – San Bernardino groundwater basin and Bunker Hill subbasin. The project would increase in impervious surface cover could reduce on-site infiltration and, consequently, could result in a localized reduction in groundwater elevations.

Despite being largely devoid of impervious surfaces, the existing site condition provides low groundwater recharge potential. Groundwater was not encountered at any of the borings during subsurface investigation at the project site. Based on the lack of any water within the borings, and the moisture contents of the recovered soil samples, the static groundwater table is considered to have existed at a depth in excess of 30± feet below existing site grades, and water level readings within the nearest monitoring well indicated a groundwater level of 149± feet below the ground surface (SoCalGeo 2019a).

As described in Section 19, *Utilities and Service Systems*, the project would be served by Redlands' existing and projected supplies. The Redlands Municipal Utilities Department provides water service to residences and businesses in its service district through a blend of local groundwater, local surface water (Mill Creek Watershed and Santa Ana River Watershed), and imported water from the California State Water Project. Local groundwater is pumped from wells in the adjudicated Bunker Hill subbasin and nearby subbasins (Redlands n.d.). Bunker Hill subbasin has history of being in overdraft. Although the subbasin is not adjudicated, a groundwater management plan is currently underway to proscribe collective management of the basin. Due to recent drought conditions and increased utilization of groundwater, Bunker Hill's water table has dropped, resulting in the lowering of one well pump in Redlands' service area. In order to prevent critical reductions in groundwater levels, Redlands participates in the Integrated Regional Water Management Plan (IRWMP) for the region to manage groundwater (SBVMWD 2015). The San Bernardino Valley Water Conservation District operates two areas that overlie the Bunker Hill subbasin in the San Bernardino Valley. These areas are at the upper end of the Santa Ana River wash area below Seven Oaks Dam and adjacent to Mill Creek just upstream of the confluence with the Santa Ana River (collectively,

the wash area). Recharge to the Bunker Hill subbasin historically has resulted from infiltration of runoff from the San Gabriel and San Bernardino Mountains. The subbasin is also replenished by deep percolation of water from precipitation and resulting runoff, percolation from delivered water, and water spread in streambeds and spreading grounds (San Bernardino Valley Water Conservation District [SBVWCD] 2015).

The project proposes to flow runoff at the project site through three subsurface storm drain lines to the proposed on-site infiltration basin. Stormwater that discharges from the proposed on-site stormwater drainage system would flow off-site to the Mission Zanja flood control channel and eventually to the Santa Ana River, where infiltration opportunity exists for recharge of the underlying Upper Santa Ana Valley – San Bernardino groundwater basin. Given that post-development drainage would preserve flow to downstream surface water bodies where groundwater recharge could continue to occur, impacts with respect to depletion of groundwater supplies and interference with recharge would be less than significant.

The project would not require groundwater pumping in excess of Redlands' extraction rights or substantially increase pumping in the Upper Santa Ana Valley – San Bernardino groundwater basin and Bunker Hill subbasin. Therefore, project water demand would not substantially deplete groundwater supplies. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c.(i) Would the project 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 result in substantial erosion or siltation on- or off-site?*
- c.(ii) Would the project 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 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*
- c.(iii) Would the project 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 that would 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?*
- c.(iv) Would the project 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 impede or redirect flood flows?*

The project would not alter the course of a stream or river on-site because the project site contains no water bodies. However, the project would alter site drainage through the addition of impervious surfaces, which can increase stormwater runoff volume and flow. The project would increase impervious surface cover on the site by 758,387 square feet. New drainage features would be constructed on-site to minimize potential flooding. The requirements of the applicable City ordinances and MS4 permit is intended to protect water quality and support attainment of water quality standards in downstream receiving water bodies. Compliance with the Redlands MS4 permit requires capture and treatment of the 85th percentile, 24-hour storm event. Furthermore, preparation of a WQMP under the Redlands MS4 permit requires projects to assess whether drainage alterations would create a Hydrologic Condition of Concern (HCOC) due to

hydromodification, such as changes in watershed hydrologic processes and runoff that result in increased streamflow and sediment transport.

As part of the project's final design review, the project would be required to submit a SUSMP demonstrating adequate stormwater retention using infiltration basins, bioretention areas, capture and controlled release tanks, or another BMP. Such BMPs would slow the velocity of water and allow sediment and debris to settle out of the water column, thereby minimizing the potential for downstream flooding, erosion/siltation, or exceedances of stormwater drainage system capacity.

The project proposes three subsurface storm drain lines that would be used to collect and convey runoff generated by the project site to the proposed on-site infiltration basin near the middle of the site along the easterly property line. Once water quality treatment is detained, excess runoff would outlet into the existing Mission Zanja flood control channel. The proposed basin would serve to treat water quality requirements and to mitigate for a two-year 24-hour storm event. The infiltration basin would propose an outlet structure to allow any excess runoff above the required water quality volume to exit the site. In the event of failure or improper maintenance of the infiltration basin, the outlet structure would also serve as an emergency spillway using grates at the top of the structure. The proposed basin would provide adequate water quality treatment and drawdown within 48 hours and would not impact flooding condition to upstream or downstream properties (Albert A. Webb Associates 2020e; Appendix I).

Based on the preliminary WQMP provided by the applicant, the project would be required to retain a runoff volume of approximately 73,919 cubic feet associated with a 0.95 inch, 24-hour rainfall event. The existing drainage pattern to the north would be maintained, and changes to time of concentration would be preserved using the infiltration basin. The project was determined not to result in a HCOC according to the Preliminary WQMP (Albert A. Webb Associates 2020d).

The project would implement BMPs to capture and retain stormwater on-site, as described above for compliance with the Redlands MS4 permit requirements. Given that the project would not result in a HCOC and would capture and treat all on-site stormwater runoff, alteration of drainage patterns on the project site would not result in substantial erosion or siltation off-site or provide substantial additional sources of polluted runoff. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

According to the Federal Emergency Management Agency (FEMA), the adjacent Mission Zanja flood control channel is located in Zone A, which are areas subject to inundation by the one-percent annual chance flood event (100-year flood). However, the project site is not located in any flood hazard areas (FEMA 2016).

Redlands is located sufficiently inland to be outside of what would be considered a potential hazard area for seiches, tsunamis, and sea level rise (Redlands 2017c). The project site is approximately 13 miles from the Perris Reservoir and 20 miles from both Lake Arrowhead and Big Bear Lake, the nearest inland surface water bodies. Therefore, the project is not located in a flood hazard, tsunami, or seiche zone where project inundation could result in the release of pollutants. No impact would occur.

NO IMPACT

- e. *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

The SARWQCB's Basin Plan designates beneficial uses for surface waters in the Santa Ana region and associated water quality objectives to fulfill such uses. According to the preliminary WQMP prepared for the project, the water bodies that would potentially receive stormwater runoff from the project site include the Mission Zanja flood control channel, Reaches 3, 4, 5 of the Santa Ana River, and Prado Park Lake. These water bodies are listed as having the following uses:

- Reach 3 of the Santa Ana River: agricultural supply; groundwater recharge; recreational uses; warm freshwater habitat for aquatic ecosystems; wildlife habitat for vegetation and prey species; waters support the habitats necessary for the survival and successful maintenance of plant or animal species designated under state or federal law as rare, threatened, or endangered; and habitats necessary for reproduction and early development of fish and wildlife.
- Reach 4 of the Santa Ana River: groundwater recharge; recreational activities; warm freshwater habitat for aquatic ecosystems; wildlife habitat for vegetation and prey species; habitats necessary for the survival and successful maintenance of plant or animal species designated under state or federal law as rare, threatened, or endangered; and habitats necessary for reproduction and early development of fish and wildlife.
- Reach 5 of the Santa Ana River: municipal and domestic water supply; agricultural supply; groundwater recharge; recreational uses; warm freshwater habitat for aquatic ecosystems; wildlife habitat for vegetation and prey species; and habitats necessary for the survival and successful maintenance of plant or animal species designated under state or federal law as rare, threatened, or endangered.
- Prado Park Lake: recreation, commercial and sportfishing uses; warm freshwater habitat for aquatic ecosystems; and wildlife habitat for vegetation and prey species (Santa Ana RWQCB 2019).

The Santa Ana River is listed as impaired for indicator Bacteria, Lead, and Copper and covered under a Total Maximum Daily Load (TMDL) for pathogens, lead, copper, and nutrients by the State's Clean Water Act 303(d) list. The Prado Park Lake is listed as impaired for pH and is covered under a TMDL for pathogens and nutrients. The Mission Zanja flood control channel is not listed as an impaired water body (Albert A. Webb Associates 2020d; Appendix H).

The requirements of the Redlands MS4 permit are intended to protect water quality and support attainment of water quality standards in downstream receiving water bodies. As described in Section 10 thresholds a, b, and c above, the project would implement on-site BMPs, including the retention, filtration, and detention of stormwater runoff which would reduce concentrations of water quality contaminants, including the nutrients and metals for which Santa Ana River and Prado Park Lake are impaired. Inlets and sub-surface storm drainpipes would be used to collect and convey runoff generated by the project site to a proposed infiltration basin for water quality treatment. Once water quality treatment is detained, excess runoff would outlet into the existing Mission Zanja flood control channel. The on-site infiltration system would allow debris, sediment, and sediment-bound pollutants to settle out of the water column prior to discharge downstream (Albert A. Webb Associates 2020d; Appendix H).

The project does not involve use of septic systems, pet parks, agricultural land or other land uses commonly associated with high concentrations of nutrients, indicator bacteria, or chemical toxicity

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and, therefore, would not exacerbate the existing impairments to Santa Ana River and Prado Park Lake. The project would not impair existing or potential beneficial uses of nearby water bodies.

The project site overlies the Upper Santa Ana Valley – San Bernardino groundwater basin. Basins identified as high- or medium-priority in the Sustainable Groundwater Management Act (SGMA) Basin Prioritization are required to submit a groundwater sustainability plan; the Upper Santa Ana Valley – San Bernardino groundwater basin does not have a groundwater sustainability management plan as it is listed as a “very low” prioritization for the SGMA (DWR 2020).

Neither construction nor operation of the proposed project would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. No impact would occur.

NO IMPACT

11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
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. Would the project physically divide an established community?

The project would be an infill development within an existing industrial and commercial area and would construct two industrial warehouse buildings on an undeveloped site. The project does not involve construction of freeways, walls, or other features that would divide an established community. In addition, the project would develop a segment of the Orange Blossom Trail, adjacent to the project, and providing a community facility that would foster community connectivity. No impact would occur.

NO IMPACT

b. Would the project 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?

The project site is zoned EV/SD, East Valley Corridor Specific Plan/Special Development District (Redlands 2020). The Specific Plan covers portions of the unincorporated area of San Bernardino County, and the cities of Redlands, and Loma Linda. The EV/SD zoning designation is intended to provide an alternative, more flexible site planning process which encourages creative and imaginative planning of administrative professional, commercial or industrial developments, or a mixture of such uses, within the framework of a single cohesive concept plan. The Special Development District provides greater regulatory, land use, and design flexibility than conventional land use district regulations, in order to achieve a more economical and efficient use of the land (Redlands 2017b). The project would effectuate the general purpose and intent of the Specific Plan by constructing an industrial development in a vacant lot in an area with existing industrial and commercial uses.

The project would be consistent with General Plan Policy 4-P.27: Promote high-quality development in the East Valley Corridor by using the East Valley Corridor Specific Plan (EVCSP) to provide opportunities for a range of office, commercial, industrial, and residential uses, and associated services and amenities.

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The development of the two industrial buildings would not conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the project would not 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, and no impact would occur.

NO IMPACT

12 Mineral Resources

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

- a. *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*
- b. *Would the project 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?*

According to the DOC, the project site and vicinity is located in Mineral Resource Zone 3 (MRZ-3), which indicates that known or inferred mineral occurrences of undetermined mineral resource significance may be present (DOC 2008). According to the Redlands General Plan EIR, the Santa Ana River Wash adjoining the northern edge of Redlands and the southern edge of Highland contains high quality construction aggregates (sand, gravel, and crushed stone) that have been mined since the 1920s. The deposits of alluvium underlying the Santa Ana River are topped by an upper layer of younger deposits suitable for use as Portland cement concrete (PCC) aggregate. This layer, made up of deposits of boulders, gravel, sand, and occasionally clay, overlies an older weathered alluvium which is probably unsuitable for use as PCC aggregate. The project site is located approximately 0.86 mile south from the nearest area designated by the State Mining and Geology Board (1987) as containing regionally significant PCC-grade aggregate resources (Redlands 2017c).

The project site currently consists of undeveloped and disturbed land. No portion of the project site is being used for extraction of mineral resources. Neither the Redlands General Plan nor the East Valley Corridor Specific Plan identify any mineral resources in their respective plan areas. Therefore, the project would have no impact with respect to mineral resources.

NO IMPACT

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13 Noise

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

Noise is sound that is simply carried through the air, whereas vibration is energy carried through buildings, structures, and the ground; noise and vibration are described further below. Information in this section is based on the *Mountain View Industrial Project Noise and Vibration Study* by Rincon (2020d), located in Appendix J.

Noise

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (Caltrans 2013a).

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response. Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by three dB; dividing the energy in half would result in a three dB decrease (Crocker 2007).

Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not “sound twice as loud” as

one source. It is widely accepted that the average healthy ear can barely perceive changes of three dBA, increase or decrease (i.e., twice the sound energy); that a change of five dBA is readily perceptible (eight times the sound energy); and that an increase (or decrease) of 10 dBA sounds twice (half) as loud (10.5x the sound energy) (Crocker 2007).

Sound changes in both level and frequency spectrum as it travels from the source to the receiver. The most obvious change is the decrease in level as the distance from the source increases. The manner by which noise reduces with distance depends on factors such as the type of sources (e.g., point or line, the path the sound will travel, site conditions, and obstructions). Noise levels from a point source typically attenuate, or drop off, at a rate of 6 dBA per doubling of distance (e.g., construction, industrial machinery, ventilation units). Noise from a line source (e.g., roadway, pipeline, railroad) typically attenuates at about 3 dBA per doubling of distance (Caltrans 2013a). Noise levels may also be reduced by intervening structures; the amount of attenuation provided by this “shielding” depends on the size of the object and the frequencies of the noise levels. Natural terrain features such as hills and dense woods, and man-made features such as buildings and walls, can significantly alter noise levels. Generally, any large structure blocking the line of sight will provide at least a 5-dBA reduction in source noise levels at the receiver (Federal Highway Administration [FHWA] 2017). Structures can substantially reduce exposure to noise as well. The FHWA’s guidelines indicate that modern building construction generally provides an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows.

The impact of noise is not a function of loudness alone. The time of day when noise occurs, and the duration of the noise, are also important factors of project noise impact. Most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors have been developed. One of the most frequently used noise metrics is the equivalent noise level (L_{eq}); it considers both duration and sound power level. L_{eq} is defined as the single steady A-weighted level equivalent to the same amount of energy as that contained in the actual fluctuating levels over time. Typically, L_{eq} is summed over a one-hour period. L_{max} is the highest root mean squared (RMS) sound pressure level in the sampling period, and L_{min} is the lowest RMS sound pressure level in the measuring period (Crocker 2007).

Noise that occurs at night tends to be more disturbing than that occurring during the day. Community noise is usually measured using Day-Night Average Level (L_{DN}), which is the 24-hour average noise level with a ten dBA penalty for noise occurring during nighttime hours (10:00 p.m. to 7:00 a.m.); it is also measured using CNEL which is the 24-hour average noise level with a five dBA penalty for noise occurring from 7:00 p.m. to 10:00 p.m. and a +10 dBA penalty for noise occurring from 10:00 p.m. to 7:00 a.m. (Caltrans 2013a). Noise levels described by L_{DN} and CNEL usually differ by about one dBA. The relationship between the peak-hour L_{eq} value and the L_{DN} /CNEL depends on the distribution of traffic during the day, evening, and night. Quiet suburban areas typically have CNEL noise levels in the range of 40 to 50 dBA, while areas near arterial streets are in the 50- to 60-plus CNEL range. Normal conversational levels are in the 60 to 65 dBA L_{eq} range; ambient noise levels greater than 65 dBA L_{eq} can interrupt conversations (Federal Transit Administration [FTA] 2018).

Vibration

Vibration is a unique form of noise because its energy is carried through buildings, structures, and the ground, whereas sound is simply carried through the air. Thus, vibration is generally felt rather than heard. Some vibration effects can be caused by noise (e.g., the rattling of windows from passing trucks). This phenomenon is caused by the coupling of the acoustic energy at frequencies

that are close to the resonant frequency of the material being vibrated. Typically, groundborne vibration generated by manmade activities attenuates rapidly as distance from the source of the vibration increases.

Propagation

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. High-frequency vibrations diminish much more rapidly than low frequencies, so low frequencies tend to dominate the spectrum at large distances from the source. Variability in the soil strata can also cause diffractions or channeling effects that affect the propagation of vibration over long distances (Caltrans 2020). When a building is exposed to vibration, a ground-to-foundation coupling loss (the loss that occurs when energy is transferred from one medium to another) will usually reduce the overall vibration level. However, under rare circumstances, the ground-to-foundation coupling may amplify the vibration level due to structural resonances of the floors and walls.

Peak particle velocity (ppv) is a measurement of maximum ground particle movement speed, specified in the U.S. in inches per second (in/sec). Table 16 provides the typical ppv for construction equipment measured at 25 feet.

Table 16 Vibration Levels during Construction Activities

Equipment	ppv at 25 ft. (in/sec)
Vibratory Roller	0.210
Large Bulldozer	0.089
Loaded Trucks	0.076
Small Bulldozer	0.003

ppv = peak particle velocity, in/sec = inches per second

Source: FTA 2018

See Appendix J for RCNM worksheets.

Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors; therefore, the vibration level threshold is assessed at occupied structures (FTA 2018). Therefore, all vibration impacts are assessed at the structure of an affected property.

Existing Noise Environment

The dominant source of noise in the project site vicinity is vehicular traffic from I-10 and local roadways, including Mountain View Avenue. The project site is bordered on the west by Mountain View Avenue, on the south by I-10, and on the northeast by a flood control channel and the future Redlands Passenger Rail. A commercial center, church and rehabilitation hospital are located west of Mountain View Avenue. A grass field of the church is located approximately 100 feet to the west of the project site’s property boundary, and a grass field of a potential long-term lodging residence at the Totally Kids Rehabilitation Hospital is also located about 100 feet to the west of the project site. In addition, residential and commercial land uses are located northeast of the flood channel approximately 210 feet from the project site.

Some land uses are more sensitive to ambient noise than other uses due to the amount of noise exposure and the types of activities involved. For example, residences, hotels, schools, libraries,

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churches, nursing homes, auditoriums, museums, parks, and outdoor recreation areas are more sensitive to noise than commercial and industrial land uses. The noise sensitive receivers nearest to the project site include the church and the rehabilitation hospital located to the west across the Mountain View Avenue. All other surrounding properties are undeveloped or developed with industrial and commercial land uses.

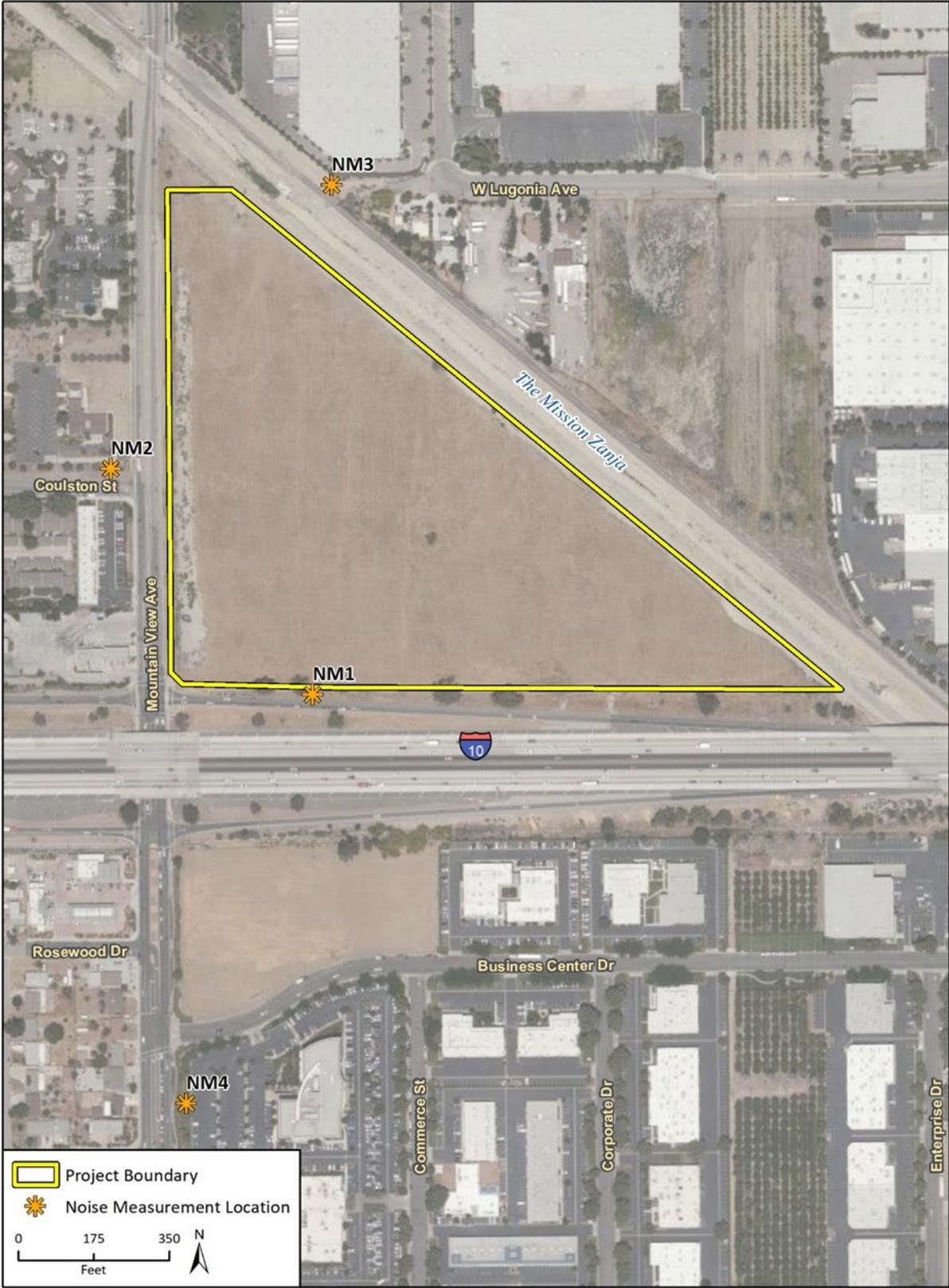
To characterize ambient sound levels at and near the project site, four 15-minute sound level measurement were conducted on August 27, 2020. Noise Measurement (NM) 1 was taken along the southern side of the project site to characterize the existing on-site noise levels from I-10 and determine noise propagation. NM 2 was taken along west of the project site and Mountain View Avenue, to characterize the existing noise level along Mountain View Avenue, and at the nearest sensitive receivers. NM 2 is also used to assess traffic noise level increases and to validate the noise model through calibration to counted traffic volumes. NM 3 was taken north of the project site to characterize the existing noise condition along the flood control channel at the non-conforming land uses located here. NM 4 was taken along Mountain View Avenue South of I-10 to characterize the existing noise environment in this area for assessing traffic noise level increases and to validate the noise model. Figure 9 shows the measurement locations, and Table 17 summarizes the results of the noise measurements.

Table 17 Project Vicinity Sound Level Monitoring Results

No.	Location	Times	Distance to Primary Noise Source	Leq (dBA)	Lmin (dBA)	Lmax (dBA)
1	Southern Property Boundary	10:10 – 10:25 a.m.	Centered on southern property line of project 50 feet from the centerline of the i-10 westbound off-ramp	70.9	78.7	68.1
2	Northeast corner of Mountain View Avenue and Coulston Street	09:38 – 09:53 a.m.	Approximately 50 feet to centerline of Coulston Street and 50 feet east of Mountain View Avenue	65.5	80.4	60.0
3	250 feet west of the terminus of Lugonia Avenue	10:47– 11:03 a.m.	Approximately 50 feet northeast of the centerline of the railroad right-of-way	53.4	65.1	51.3
4	San Bernardino County Child Support Services	11:23 – 11:38 a.m.	Approximately 50 feet east of Mountain View Avenue	68.1	80.2	61.5

Source: Rincon 2020d; Appendix J.

Figure 9 Noise Measurement Locations



Regulatory Framework

California Green Building Code

California Green Building Standards Code 2016 (CalGreen) Section 5.507.4, Acoustical Control, requires that construction within the 65 dB(A) day-night noise level (L_{dn}) contour of an airport, freeway, expressway, railroad, industrial noise source, or other fixed source. According to Section 5.507.4.1.1, where noise contours are not readily available “buildings exposed to a noise level of 65 dB L_{eq} -1-hr during any hour of operation shall employ sound-resistant assemblies as determined by a prescriptive method (CalGreen Section 5.507.4.1) or performance method (CalGreen Section 5.507.4.2).

- Projects may demonstrate compliance through the prescriptive method if wall and roof-ceiling assemblies exposed to the noise source shall meet a composite Sound Transmission Class (STC) rating of at least 50 or a composite Outdoor/Indoor Transmission Class (OITC) rating of no less than 40, with exterior windows of a minimum STC of 40 or OITC of 30.
- Projects may demonstrate compliance through the performance method if wall and roof-ceiling assemblies exposed to the noise source shall be constructed to provide an interior noise environment that does not exceed 50 dB L_{eq} -1-hour in occupied areas during hours of operations.

Redlands General Plan

The Redlands General Plan Noise Element and Municipal Code establishes the following applicable policies and implementations related to noise and vibration.

- **Policy 9.0a** Protect public health and welfare by eliminating existing noise problems where feasible and by preventing significant degradation of the future acoustic environment.
- **Policy 9.0b** Incorporate noise considerations into land use planning decisions.
- **Policy 9.0c** Support measures to reduce noise emissions by motor vehicles, aircrafts and trains.
- **Policy 9.0f** Require a noise impact evaluation based on noise measurements at the site for all projects in Noise Referral Zones (B,C, or D) as shown on General Plan Table 9.1[Table D] and on General Plan 9.1 or as determined from tables in the Appendix, as part of the project review process. Should measurements indicate that unacceptable noise levels will be created or experienced, require mitigation measures based on a detailed technical study prepared by a qualified acoustical engineer (i.e., a Registered Professional Engineer in the State of California with a minimum of three years’ experience in acoustics).
- **Policy 9.0h** Minimize potential transportation noise through proper design of street circulation, coordination of routing, and other traffic control measures.
- **Policy 9.0i** Require construction of barriers to mitigate sound emissions where necessary or where feasible, and encourage use of walls and berms to protect residential or other noise sensitive land uses that are adjacent to major roads, commercial, or industrial areas.
- **Policy 9.0l** Adopted and enforce a new Community Noise Ordinance to mitigate noise conflicts between adjacent land uses, to ensure that City residents are not exposed to excessive noise levels from existing and new stationary noise sources, and to educate the public regarding noise issues.
- **Policy 9.0q** Provide for continued evaluation of truck movements in the City to provide effective separation from residential or other noise sensitive land uses.

- **Policy 9.0s** Require mitigation to ensure that indoor noise levels for residential living spaces not exceed 45dB CNEL due to the combined effect of all exterior noise sources.
- **Policy 9.0t** Require proposed commercial projects near existing residential land use to demonstrate compliance with the Community Noise Ordinance prior to approval of the project.
- **Policy 9.0v** Consider the following impacts as possibly “significant”:
 - o An increase in exposure of four or more dB if the resulting noise level would exceed that described as clearly compatible for the affected land use, as established in General Plan Table 9.1 and General Plan Table 9.2 [Table C];
 - o Any increase of six or more, due to the potential for adverse community response.
- **Policy 9.0w** Limit hours for all construction or demolition work where site-related noise is audible beyond the site boundary.
- **Policy 9.0y** Minimize impacts of loud trucks by requiring that maximum noise levels due to single events be controlled to 50 dB bedrooms and 55dB in other habitable spaces.

The General Plan includes the Community Noise Exposure table (Table 18), which establishes acceptable exterior noise standards for various uses. Noise exposure in the range of below 60 dB CNEL to more than 85 dB CNEL is clearly and normally acceptable for warehouse developments.

Table 18 City of Redlands Noise and Land Use Compatibility Matrix in Community Noise Equivalent Level (CNEL)

Categories	Uses	<60	65	70	75	80	85>
Residential	Single Family, Duplex, Multiple Family	A-C	C	C	C-D	D	D
Residential	Mobile Home	A-C	C	C	C-D	D	D
Commercial Regional, District	Hotel, Motel, Transient Lodging	A	A-B	B	B-C	C	C-D
Commercial Regional, Village District, Special	Commercial Retail, Bank, Restaurant, Movie Theater	A	A	A	A-B	B	B-C
Commercial, Industrial, Institutional	Office Building, Research and Development, Professional Offices, City Office Building	A	A	A-B	B	B-C	C-D
Commercial Recreation Institutional Civic Center	Amphitheater, Concert Hall, Auditorium, Meeting Hall	B	B-C	C	C-D	D	D
Commercial Recreation	Children’s Amusement Park, Miniature Golf, Course, Go-cart Track, Equestrian Center, Sports Club	A	A	A	A-B	B	B
Commercial General, Special Industrial, Institutional	Automobile Service Station, Auto Dealership, Manufacturing, Warehousing, Wholesale, Utilities	A	A	A	A-B	B	B
Institutional General	Schools’ Classroom, Day Care	A	A-B	B-C	C	C-D	D
Open Space	Parks	A	A	A-B	B-C	C-D	D
Open Space	Golf Course, Cemeteries, Nature Centers, Wildlife Reserves, Wildlife Habitat	A	A	A	A-B	B-C	C
Agriculture	Agriculture	A	A	A	A	A	A

Source: Redlands General Plan 2017c.

Zone A Clearly Compatible: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any noise insulation requirements.

Zone B Normally Compatible: New construction or development should be undertaken only after detailed noise analysis of the noise reduction requirements are made and needed noise insulation features in the design are determined. Conventional construction, with closed windows and fresh air supply systems or air conditioning, will normally suffice.

Zone C Normally Incompatible: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of noise reduction requirements must be made and needed noise insulation features included in the design.

Zone D Clearly Incompatible: New construction or development should generally not be undertaken.

Redlands Municipal Code

The Redlands Municipal Code has the following interior and exterior noise standards based on Sections 8.06.070 and 0.06.080 (Redlands 2019c).

SECTION 8.06.070 EXTERIOR NOISE LIMITS

- A. The noise standards for the categories of land uses identified in Table 19 of shall, unless otherwise specifically indicated, apply to all such property within a designated zone.

Table 19 Maximum Permissible Exterior Sound Levels by Receiving Land Uses

Receiving Land Use	Time Period	Noise Level (dBA)
Single-family residential districts; multi-family residential districts; public space; institutional	10:00 p.m. – 7:00 a.m.	50
Single-family residential districts; multi-family residential districts; public space; institutional	7:00 a.m. – 10:00 p.m.	60
Commercial	10:00 p.m. – 7:00 a.m.	60
Commercial	7:00 a.m. – 10:00 p.m.	65
Industrial	Anytime	75

dBA = decibel

Source: Section 8.06.070 of the Redlands Municipal Code

- B. No person shall operate, or cause to be operated, any source of sound at any location within Redlands or allow the creation of any noise on property owned, leased, occupied or otherwise controlled by such person which causes the noise level when measured on any other property to exceed:
- 1) The noise standard for that land use specified in Table 19 for a cumulative period of more than thirty (30) minutes in any hour; or
 - 2) The noise standard specified in Table 19 plus five (5) dB for a cumulative period of more than fifteen (15) minutes in any hour; or
 - 3) The noise standard specified in Table 19 plus ten (10) dB for a cumulative period of more than five (5) minutes in any hour; or
 - 4) The noise standard specified in Table 19 plus fifteen (15) dB for a cumulative period of more than one minute in any hour; or
 - 5) The noise standard specified in Table 19 plus twenty (20) dB or the maximum measured ambient level, for any period of time.

- C. If the measured ambient level exceeds the allowable noise exposure standard within any of the first four (4) noise limit categories above, the allowable noise exposure standard shall be adjusted in five (5) dB increments in each category as appropriate to encompass or reflect said ambient noise level. In the event the ambient noise level exceeds the fifth noise limit category, the maximum allowable noise level under this category shall be increased to reflect the maximum ambient noise level.
- D. The ambient noise shall be measured at the same location along the property line utilized in subsection 8.06.060B of this chapter, with the alleged offending noise source inoperative. If the alleged offending noise source cannot be shut down, the ambient noise shall be estimated by performing a measurement in the same general area of the source but at a sufficient distance that the noise from the source is at least ten (10) dB below the ambient in order that only the ambient level be measured. If the difference between the ambient and the noise source is five (5) to ten (10) dB, then the level of the ambient itself can be reasonably determined by subtracting a one decibel correction to account for the contribution of the source.
- E. In the event the alleged offensive noise contains a steady, audible tone such as a whine, screech, hum, or is a repetitive noise such as hammering or riveting, or contains music or speech conveying informational content, the standard limits set forth in table 1 [Table D] of this section shall be reduced by five (5) dB. (Ord. 2579 § 1, 2004) Section 8.06.080

INTERIOR NOISE STANDARDS

- (A) No person shall operate or cause to be operated any source of sound, or allow the creation of any noise, which causes the noise level when measured inside a neighboring receiving occupied building to exceed the following standards:
 - (1) The noise standard for that land use specified in Table 20 for a cumulative period of more than five (5) minutes in any hour.
 - (2) The noise standard for that land use specified in Table 20 plus five (5) dB for a cumulative period of more than one minute in any hour.
 - (3) The noise standard for that land use specified in Table 20 plus ten (10) dB for the maximum measured ambient noise level for any period of time.

Table 20 Interior Noise Limits

Land Use	Time Period	Noise Level dBA
Single-family residential districts	Anytime	45
Multi-family residential districts; public space; institutional	Anytime	45
Commercial	Anytime	50
Industrial	Anytime	60

dBA = decibel

Source: Section 8.06.070 of the Redlands Municipal Code (Redlands 2019c)

- (B) If the measured ambient level exceeds the allowable exterior noise exposure standard in Table 19 of this chapter, the allowable interior noise exposure level shall be adjusted in five (5) dB increments as appropriate to reflect the ambient noise level.

SECTION 8.06.090 NOISE DISTURBANCES PROHIBITED

The following acts, and the causing or permitting therefore, are declared to be in violation of this chapter:

- (B) Loudspeaker or Stereo Systems: Using or operating for any purpose any loudspeaker, loudspeaker system, stereo system or similar device between the hours of ten o'clock (10:00) P.M. and seven o'clock (7:00) A.M., such that the sound therefrom creates a noise disturbance across a residential property line, or at any time violates the provisions of section 8.06.030 or 8.06.070 of this chapter, except for noncommercial public speaking, public assembly or activity for which an exemption has been provided for in either this section or section 8.06.120 of this chapter.
- (E) Loading and Unloading: Loading, unloading, opening, closing or other handling of boxes, crates, containers, building materials, refuse containers or similar objects between the hours of ten o'clock (10:00) P.M. and six o'clock (6:00) A.M. in such a manner as to cause a noise disturbance across a residential real property line or at any time to violate section 8.06.030 of this chapter.
- (F) Construction and/or Demolition: Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of six o'clock (6:00) P.M. and seven o'clock (7:00) A.M., including Saturdays, or at any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real property line, except for emergency work by public service utilities, Redlands or another governmental entity. All mobile or stationary internal combustion engine powered equipment or machinery shall be equipped with exhaust and air intake silencers in proper working order, or suitable to meet the standards set forth herein.
- (G) Vibration: Operating or permitting the operation of any device that creates a vibration which is above the vibration perception threshold of an individual at or beyond the property boundary of the source if on private property or at one hundred fifty feet (150') from the source if on a public space or public right of way.
- (K) Noise Sensitive Zones: Creating or causing the creation of any sound within any noise sensitive zone, so as to exceed the specified land use noise standards set forth in Table 19 and subsection 8.06.070B, or so as to interfere with the functions of such activity or annoy the occupants in the activity, provided that conspicuous signs are displayed indicating the presence of the zone.
- (M) Places of Public Entertainment: Operating or permitting the operation or playing of any loudspeaker, musical instrument or other source of sound in any place of public entertainment that exceeds ninety five (95) dBA as read on the slow response of a sound level meter at any point normally occupied by a customer, without a conspicuous and legible sign with minimum one inch (1") letter height stating: WARNING! SOUND LEVELS WITHIN MAY CAUSE HEARING IMPAIRMENT.

SECTION 8.06.120 EXEMPTIONS

- A. Emergency Exemption: This chapter shall not apply to:
1. The emission of sound for the purpose of alerting persons to the existence of an emergency such as, but not limited to, loudspeakers, horns, sirens, whistles or other similar devices which emit sound, only for the time required to make notification of the emergency condition; or
 2. The emission of sound in the performance of emergency work or the temporary provision of essential services such as, but not limited to, utility system repairs or upgrades, infrastructure repairs, structural repairs and other unscheduled, infrequent and nonrecurring activities, required to protect persons and property from physical harm or loss of essential services.
- B. Warning Devices: This chapter shall not apply to warning devices necessary for the protection of public safety. Police, fire and ambulance sirens and train horns are exempt from this chapter.
- C. Outdoor Activities: This chapter shall not apply to occasional outdoor public gatherings, public dances, shows, and sporting and entertainment events conducted within city parks and city owned facilities, including events conducted at the Redlands Bowl, provided such events are conducted pursuant to a permit or license issued by the city.
- D. School Activities: This chapter shall not apply to activities and operations conducted on the grounds of any public or private elementary, intermediate or secondary school or colleges and universities.
- E. Hospital: This chapter shall not apply to activities and operations conducted within the grounds of the Redlands Community Hospital provided that said activities and operations are in compliance with the acoustical provisions of the hospital's conditional use permit.
- F. Minor Maintenance Of Residential Property: This chapter shall not apply to noise sources associated with the minor maintenance of residential property, provided such activities take place between the hours of seven o'clock (7:00) A.M. to eight o'clock (8:00) P.M. on weekdays, and seven o'clock (7:00) A.M. to eight o'clock (8:00) P.M. on weekends and legal holidays, and provided that such activities generate no more than ninety (90) dBA at or within the real property line of the residential property. Activities covered under this provision include, but are not limited to, maintenance of landscaping and minor repair of residential dwellings or ancillary structures.
- G. Construction Activity: This chapter shall not apply to noise sources associated with new construction, remodeling, rehabilitation or grading of any property provided such activities take place between the hours of seven o'clock (7:00) A.M. and six o'clock (6:00) P.M. on weekdays, including Saturdays, with no activities taking place at any time on Sundays or federal holidays. All motorized equipment used in such activity shall be equipped with functioning mufflers.

- a. *Would the project result in 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?*

Construction

Construction Equipment

Construction activity would result in temporary noise in the project area, exposing surrounding sensitive receptors, such as the Totally Kids Rehabilitation Hospital and the Victoria Seventh-Day Adventist Church, to increased noise levels. Construction noise would typically be higher during the heavier periods of initial construction (i.e., site preparation and grading work) and would be lower during the later construction phases (i.e., building construction, architectural coating). Typical heavy construction equipment during project grading and site preparation would include backhoes, graders, and dozers. It is assumed that diesel engines would power the construction equipment. Construction equipment would not all operate at the same time or location. In addition, construction equipment would not be in constant use during the eight-hour operating day.

The grading equipment would be constantly moving soil from one portion of the site to other portions of the site to balance and level the site. The grading activities would generate the greatest noise levels of the identified activities with a noise level of 82 dBA L_{max} at a distance of 50 feet. Given the fluctuations in power, this results in a maximum hourly noise level of approximately 82 dBA L_{eq} (RCNM calculations are included in Appendix A of the Noise Study located in Appendix J).

Similar size cranes and backhoes/loaders used in the grading process would trench the foundations and utilities, followed by concrete trucks to pour the foundations. However, these would be at a slightly greater distance due to the lower elevation. Following the setting of the foundations it is anticipated only deliveries and minor equipment (e.g., forklifts, man-lifts, and flatbeds with mounted cranes) would be used during building construction. A concrete truck would also likely be used during the final driveway and curb pour. To be conservative, these other activities are assumed to generate noise levels on the same order as grading and excavation, i.e. 82 dBA L_{eq} at 50 feet.

The project site is approximately 500 feet across; grading and excavation equipment would move across the site as it works. At the nearest point, the center of this construction activity would be approximately 100 feet from potential outdoor areas of the church and the potential outdoor area of the long-term residence on the hospital site. Therefore, 250 feet is considered a conservative case for the majority of construction. At a distance of 250 feet, assuming an acoustically hard site, the estimated typical construction noise levels of 82 dBA L_{eq} at 50 feet would attenuate to 68 dBA L_{eq} at 250 feet.

Pursuant to Section 8.06.120 of the Noise Ordinance, construction noise is exempt from City standards if it occurs between 7:00 a.m. to 6:00 p.m., Monday through Saturday, and not on federal holidays. Construction would only occur between these hours and would therefore be consistent with the Noise Ordinance. Impacts would be less than significant.

Construction Traffic

Project construction would result in a temporary increase or less in vehicle traffic along Mountain View Avenue and other nearby roadways from worker and vendor trips. However, these trips would result in a small increase of roadway traffic compared to overall traffic volumes and not result in a

doubling of traffic nor result in a noticeable increase in sound. Therefore, impacts from construction traffic would be less than significant.

Operational

ON-SITE NOISE COMPATIBILITY

Noise levels at the project site were estimated based on the future traffic volumes. Pursuant to the Redlands General Plan’s land use compatibility criteria, a clearly compatible noise level for industrial land uses is 75 CNEL. However, CalGreen Section 5.507.4 requires interior noise level structural noise attenuation if the building is exposed to noise levels in excess of 65 CNEL. This is similar to, but more restrictive than, Redlands’ requirement that the project would be need to incorporate measures to reduce interior noise levels if noise levels exceed 75 CNEL; therefore, the 65 CNEL standard is applied to the project.

The edge of the project site is approximately 90 feet from the centerline of Mountain View Avenue and 210 feet from the edge of I-10. At the project’s building façade, noise levels would reach 66 and 79 CNEL from Mountain View Avenue and I-10, respectively. Therefore, portions of the site would fall within the normally incompatible noise range. The project is required to conform to CalGreen requirements, including noise compatibility standards. Prior to issuance of building construction permits, the applicant would demonstrate, during the plan check process, that the proposed project would comply with CalGreen Section 5.507.4.⁵ Impacts related to on-site noise compatibility would be less than significant.

OPERATIONAL TRAFFIC

The project would generate new vehicle trips that would increase noise levels on nearby roadways, which would occur primarily on Mountain View Avenue and I-10. Traffic noise was modeled with the FHWA Traffic Noise Model. Traffic volumes on Mountain View Avenue were taken from the TIA prepared for the project. Traffic volumes on I-10 and associated off-ramp traffic volumes were taken from Caltrans 2019 traffic volume survey and the Caltrans Performance Measurement Systems. A two percent per year growth factor was applied to estimate future freeway traffic volume. The noise levels from an increase in traffic volumes for existing and existing plus project scenarios are shown in Table 21.

Table 21 Off-site Traffic Noise Level Increases - Noise Level in CNEL

Roadway	Segment	Existing (dBA)	Existing Plus Project (dBA)	Increase	Opening Year (dBA)	Opening Year Plus Project (dBA)	Increase
Mountain View Avenue	Victoria Ave to Coulston Street	64	65	1	64	65	1
Mountain View Avenue	Coulston Street to I-10 WB	65	66	1	65	66	1
I-10	I-10 WB to I-10 EB	68	68	0	68	69	1
I-10	I-10 EB to Redlands Boulevard	67	68	1	67	68	1

dBA = decibel; Hz = Hertz; KHz = kilohertz

Source: Rincon 2020d; Appendix J

⁵ This can be demonstrated through either the prescriptive method or performance method.

Due to the relatively small increase in overall ADT volumes from project-generated traffic, the maximum noise level increase would be one CNEL, which is well below the most restrictive three CNEL increase threshold. Therefore, project operational traffic would not result in a substantial permanent increase in noise levels and impacts would be less than significant.

OPERATIONAL NOISE LEVELS AT OFF-SITE RECEIVERS

On site-noise sources were modeled with SoundPLAN. Propagation of modeled stationary noise sources was based on ISO Standard 9613-2, "Attenuation of Sound during Propagation Outdoors, Part 2: General Method of Calculation." The assessment methodology assumes that all receivers would be downwind of stationary sources. This is a worst-case assumption for total noise impacts, since, in reality, only some receivers would be downwind at any one time.

On-site noise sources would include general conversations, landscape maintenance, waste hauling, parking activities, loading activities, and the heating, ventilation, and air conditioning (HVAC) equipment. See Figure 10 for an illustration of on-site noise sources. There are no large gathering areas on the project site and these sources would be transient in nature as people transit from vehicles to businesses. Thus, general conversations would not represent a substantial noise source. Landscape maintenance and waste hauling are regulated by the noise ordinance with allowable hours and other limitations when in proximity to residential areas. Thus, the primary noise sources of concern would be associated with the parking activities, loading activities, and HVAC units for the project buildings since there is no specific regulation beyond the limitation of noise levels. Noise levels for these activities are shown in Table 22.

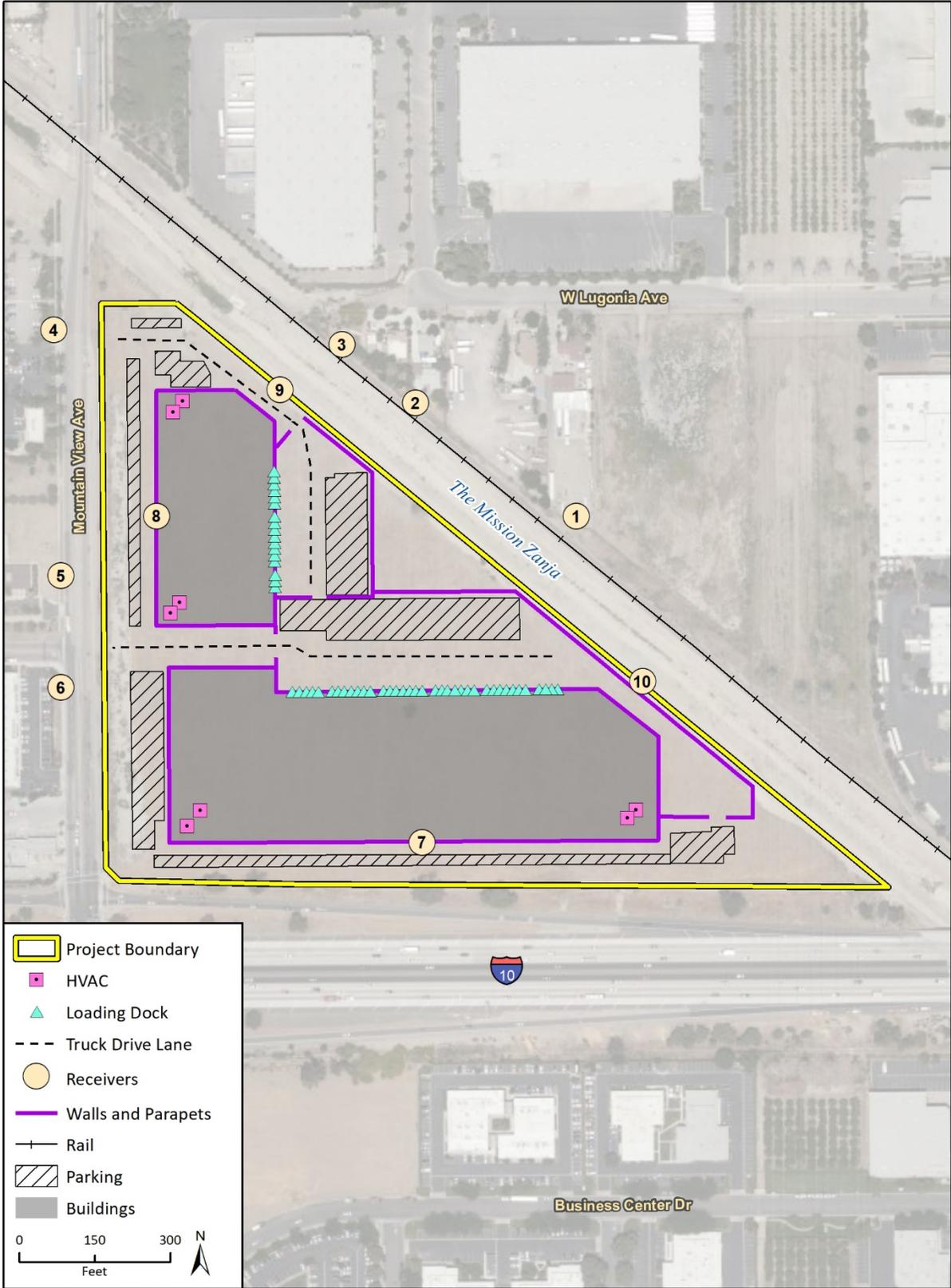
Table 22 Modeled Noise Levels in A-weighted Scale (dBA)

Source	Overall Noise Level
Loading General Cargo	82.1
Truck Back Up Alert	103.0
Truck Idle	90.8
Truck Accelerating	100.7
HVAC	77.0

dB = decibel; dBA = "A" weighted decibel
Source: Rincon 2020d; Appendix J

Typically, a building requires one ton of HVAC per 600 square feet of building space. Based on an office size of 4,400 square feet within each building, 15 tons of HVAC would be required for the office space. For conservative modeling, two 5-ton units (Carrier 48HC-A06) were located over each office location as the potential HVAC unit locations. The overall noise level for a Carrier 48HC-A06 is in Table 22. All HVAC units would be located on the roof of the structures. This analysis conservatively assumes that all eight HVAC units would operate at full power for a full hour (100 percent for 60 minutes) during the daytime and nighttime.

Figure 10 On-site Project Noise Sources



Parking activities are based on the number of parking spaces and the type of land use, for modeling purposes, the parking lot has been divided into three areas. The parking areas are along the project boundary and between Buildings 1 and 2. Total parking is approximately 345 spaces. Parking areas were modeled as visitor and employee parking for activity levels and each area was modeled based on the number of spaces within each lot.

For a conservative worst-case assessment, it was assumed the HVAC would be operating at full power. All parking lots would be fully active, trucks driving on-site were modeled as an on-site roadway, a truck was modeled backing in for five minutes, idling for five minutes in front of each bay, accelerating away for one minute, and unloading activities would occur at every bay door for the entire hour. This is a conservative estimate since it is unlikely that all these activities would occur on-site at the same time for the entire day.

Based on the proximity to I-10, traffic noise modeling of the existing conditions was conducted to determine the typical noise levels at adjacent properties throughout the day. Based on Caltrans traffic counts the existing average daily traffic (ADT) volumes on I-10 in the project area is 202,000. Based on Caltrans Performance Management System (PeMS), the peak hour traffic volume is approximately 7 percent of the total traffic volume. Using the traffic volumes for the existing condition from the project traffic report on Mountain View Avenue and the existing traffic for I-10, the existing ambient noise levels are estimated as shown in Table 23. As shown in Table 23, the existing ambient noise levels in the project area during the nighttime would exceed the City noise level limits stated in the RMC.

As shown in Table 23, combined operational activities on the project site would generate noise levels up to 53 dBA L_{eq} at nearby properties. Resulting noise contours are illustrated in Figure 11. The loudest sources for each receiver are dependent on location. Receivers 1 through 3 are exposed primarily to loading and HVAC noise, ranging from 51 to 53 dBA L_{eq} . Receivers 4 through 6 are primarily exposed to parking lot noise, which averages 48 to 51 dBA L_{eq} . The combined operational noise from the parking lots, loading activities, and HVAC units would not exceed the City’s daytime or nighttime exterior noise standards at any of the surrounding properties when adjusted for existing ambient noise levels. Therefore, operational noise impacts would be less than significant.

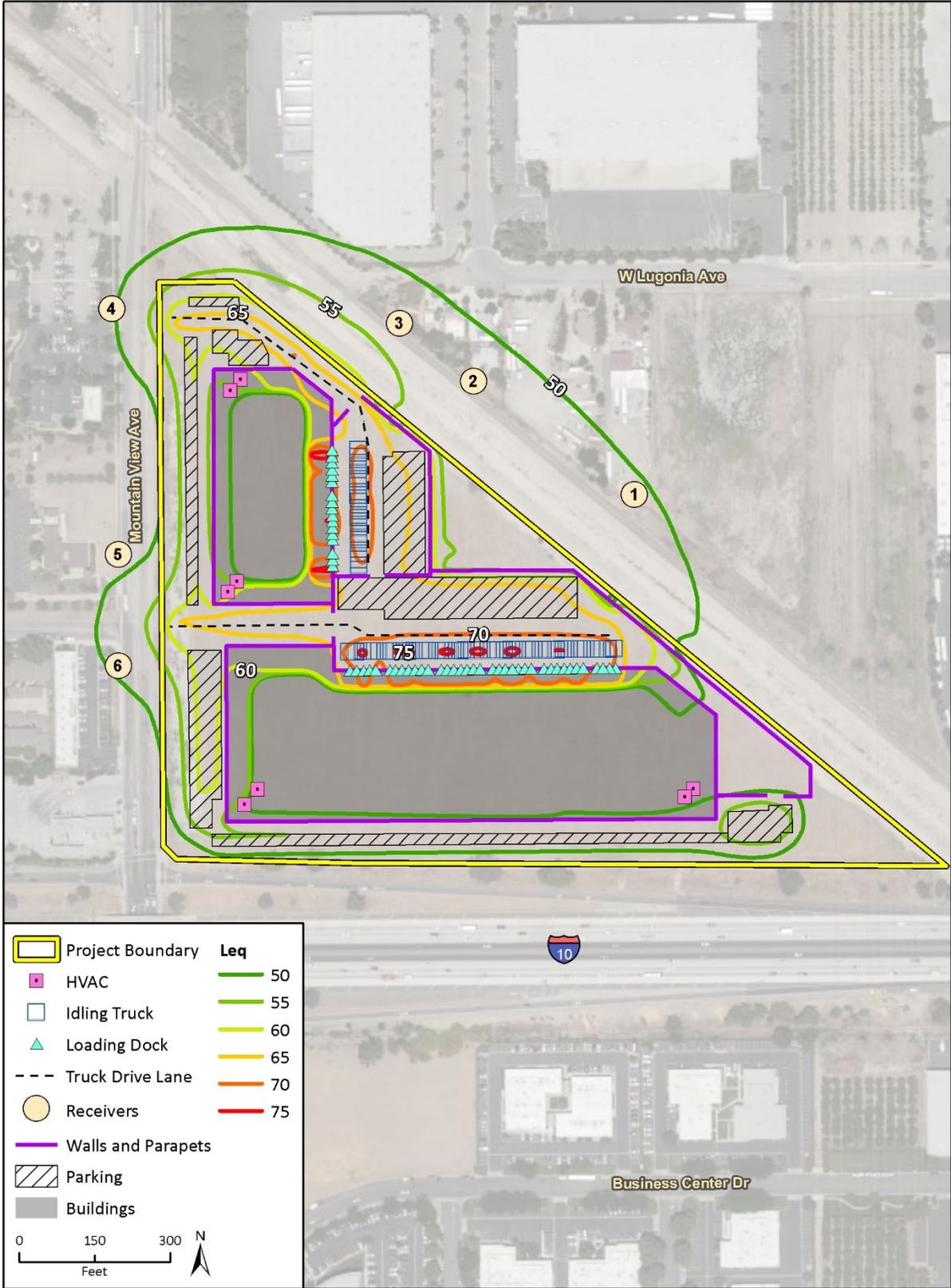
Table 23 Operational Noise Levels at Off-site Land Uses (dBA L_{eq})

Receiver	Land Use Zoning	Land Use	Existing Nighttime Noise Level	Limit	Project Noise Level	Exceed Thresholds
1	EVSD	Residential	57	60	51	No
2	EVSD	Residential	55	55	52	No
3	EVSD	Automotive Repair	54	55	53	No
4	Residential Urban	Rehabilitation Hospital	60	60	49	No
5	Residential Urban	Church	62	65	48	No
6	Residential Medium	Commercial Center	64	65	51	No

Source: Rincon 2020d; Appendix J

LESS THAN SIGNIFICANT IMPACT

Figure 11 Operational Noise Contours



Imagery provided by Microsoft Bing and its licensors © 2020.

Fig 8: On-Site Noise Contours

- b. *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

Construction activities known to generate excessive groundborne vibration, such as pile driving, would not be conducted by the project. The greatest anticipated source of vibration during general project construction activities would be from a dozer, which would be used during grading activities and may be used within 140 feet of the nearest off-site structure (the church to the east). During grading a dozer would create approximately 0.089 in./sec. ppv at a distance of 25 feet (Caltrans 2020), which would equal 0.013 at 140 feet. This vibration level is lower than the threshold of 0.24 in./sec. ppv as defined in section 8.06.090.F of the Redlands Municipal Code.

Other general construction activities, such as paving and building construction activities are anticipated to be at greater distances and would generate lower vibration levels at these distances. As vibration levels from intermittent activities at the boundary would be less than 0.24 in./sec. ppv and other longer-term construction activities would be less than 0.035 in./sec. ppv. Therefore, temporary impacts associated with the roller (and other potential equipment) would be less than significant.

Operation of the project would not include any substantial vibration sources and would therefore be lower than the applicable thresholds as defined by section 8.06.090.F of the Redlands Municipal Code. Therefore, operational vibration impacts would be less than significant.

LESS THAN SIGNIFICANT

- 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?*

As described in Section 9, *Hazards and Hazardous Materials*, significant impacts would occur over noise-sensitive areas in the 65 CNEL noise contour, based upon the FAA Integrated Noise Model, DNL or the CNEL. According to the Airport Layout Plan Narrative Report for the San Bernardino International Airport, the project site is located outside the ultimate 65 CNEL noise exposure contour noise contours for the airport upon its planned build-out based on 2030 forecast conditions (San Bernardino International Airport Authority 2010). Therefore, the project site is not located in an area with noise over 65 CNEL and would not expose employees or visitors to excessive noise. Based on the noise level contours, the project site is located outside the airport's 60 CNEL noise contour. Therefore, the project would not result in substantial noise exposure from airport noise to construction workers, users, or employees of the project, and no impact would occur.

NO IMPACT

14 Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<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. *Would the project 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)?*

The project would generate temporary construction and long-term operational employment through the construction of two warehouse buildings. The project would not construct any new housing, extension of roads, or major infrastructure. As the proposed warehouse buildings are speculative and not developed for a specific client, the exact number of employees for this project is unknown at this time. Light Industrial (LI) uses would employ one worker for every 1,030 square feet of building area (Riverside County 2015). Based on this employment generation rate, the project is expected to create approximately 409 new recurring jobs in the region. Employees are expected to predominantly be drawn from the existing workforce in Redlands and the surrounding region. The development of the project is not likely to add to population growth as the existing regional workforce is anticipated to adequately supply the needed employees. Therefore, the project would not directly induce population growth in the area through the introduction of new residents.

Projected employment densities for various land uses vary widely, depending on the location and actual business activities. The California Department of Finance (DOF) reports that the total population for Redlands in January 2020 was 70,952, or 3.3 percent of San Bernardino County’s total population of 2,180,537 (DOF 2020). Additionally, SCAG reports that between 2007 and 2017, total jobs in Redlands decreased by 2.5 percent (SCAG 2019). The unemployment rate in the Riverside-San Bernardino-Ontario area as of February 2020⁶ was estimated at 4.0 percent (U.S. Bureau of Labor Statistics 2020). Thus, it is expected that the project would largely absorb workers from Redlands and the regional labor force and would not generally attract new workers into the region. Therefore, the project would not directly or indirectly induce substantial unplanned population growth and impacts would be less than significant.

LESS THAN SIGNIFICANT

⁶ The most recent available data prior to shelter-in-place mandates due to COVID-19.

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- b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

The project site is currently undeveloped, with no existing residences. As noted under Checklist Item a. of this section, the project would construct two speculative warehouse buildings. Therefore, the project would not necessitate the construction of replacement housing elsewhere. There would be no impact.

NO IMPACT

15 Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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:				
1 Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2 Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3 Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4 Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5 Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a.1. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

RFD provides fire protection services to Redlands from four stations. The nearest fire station to the project site is Station 264 at 1270 West Park Avenue, approximately 2.2 miles southeast of the project site. RFD responds to nearly 8,000 calls for service annually with 57 Emergency Operations Division staff, in a service area of 37 square miles (Redlands 2020a). Station 264 would be able to provide fire protection services for the proposed project without the need to expand its facilities to provide services.

By virtue of generating new employment, the proposed project may incrementally increase the service population of the RFD, as it would be anticipated that employees would mainly reside in the RFD service area. However, it is unknown how many employees associated with the proposed project would relocate to the RFD service area from outside its boundaries.

The Redlands General Plan states that Redlands has been considering developing new police and fire administrative services facilities for several years, to replace the existing facilities housing Police and Fire administrative services (Redlands 2017a).

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Redlands Municipal Code Chapter 3.60 established the Public Facilities Development Fees with the purpose of implementing the Redlands General Plan, so that that public facilities and related improvements satisfy City standards and are available concurrent with the needs caused by new development within Redlands. Fees are collected from applicants for development projects for the purpose of constructing, improving, providing and maintaining public facilities as identified in the Redlands public facilities program. The project developer would be required to contribute development impact fees to Redlands to support future fire facilities and services as described by the Fire Protection Facilities Fee, which is included in the Public Facilities Development Fee (Redlands 2019d).

The project would not impede the ability of RFD to provide fire protection services to its service area because existing roadways would not be altered in a way that would impede access. The improvements made to Mountain View Avenue and new interior vehicle and fire lanes as part of the proposed project would expand emergency access to the project site. The project would be required to comply with the local amendment to California Fire Code Section 914.12, reflected in Redlands Fire Code Section 15.20.500. Additionally, pursuant to Action 4-A.17 of the Redlands General Plan, Redlands would work with RFD through the review of proposed development projects to consider fire safety issues in planning and design (Redlands 2017a). A Fire Master Plan would be required for submittal to the RFD, which is a site plan reflecting all the following fire department related items, including the location of all fire hydrants, sprinkler locations, Knox box locations, gates, fire lane specifications, fire command room, emergency personnel access points, and water supply connections (Redlands 2019c).

Therefore, impacts with respect to fire protection facilities would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.2. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

The Redlands Police Department (RPD) is located approximately 2.2 miles southeast of the project site at 1270 West Park Avenue. There are four other divisions located citywide. According to the Redlands General Plan, in 2015, the RPD had an average response time of 6.5 minutes for police services and a service ratio of 1.1 officers per 1,000 residents. According to the RPD, although there are no industry standards for response time to emergency calls, a response time of 4.5 minutes is desirable in a city of this size (Redlands 2017a). The PPD has a total of 88 sworn officers, 40 full-time professional staff members, and 50 volunteers (Redlands 2020b). Based on the 2020 population of Redlands (70,952 persons), the PPD currently maintains a staffing ratio of 1.2 officers per 1,000 residents. California Highway Patrol patrols I-10.

The proposed project may result in new residents to Redlands, although the exact number is unknown. As described above with fire protection, the proposed project may incrementally increase the service population of the RPD, as it would be anticipated that employees would mainly reside in the RPD service area. However, it is unknown how many employees associated with the proposed project would relocate to the RPD service area from outside its boundaries. This increase would not substantially decrease the ratio of sworn officers to residents. The project would not increase the service area of RPD, and RPD has confirmed that it can provide police protection services with current resources (Martinez 2020).

The project’s incremental contribution to demand for new police protection facilities would be offset by payment of the required Police Protection Facilities Fee. New or expanded police facilities may be implemented irrespective of the proposed project and would be required to undergo the appropriate level of environmental review. Additionally, pursuant to Action 4-A.17 of the Redlands General Plan, Redlands Planning Division would work with RPD through the review of proposed development projects to considered safety issues in design (Redlands 2017a). Therefore, impacts with respect to police protection facilities would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.3. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

The project site is located within the Redlands Unified School District (RUSD), which had a 2018-19 enrollment of 22,341 students (Education Data Partnership 2020). RUSD has 16 elementary schools, four middle schools, four high schools, one adult school, and an online learning academy (RUSD 2020a). Last year, 19 RUSD schools had at least one impacted grade due to enrollment capacity. Students may transfer to other schools in the district if their local school is impacted (RUSD 2018).

In the most conservative scenario, all future 409 estimated employees of the project would be new residents to the district, and all would occupy single-family residences. In this scenario, the project would generate approximately 102 elementary students, 50 middle school students, and 80 high school students, or 232 total students, using student generation rates from the nearby San Bernardino City Unified School District (SBCUSD 2016). The student generation rates and approximate number of students are shown in Table 24.

Table 24 Student Generation

School Level	Generation Rate	Number of Students
Elementary School (K-5)	0.2489	102
Middle School (6-8)	0.1222	50
High School (9-12)	0.1946	80
Total		232

Source: SBCUSD 2016

The estimated 232 students would live in various neighborhoods in the Redlands Unified School District and likely attend local schools. The Redlands General Plan states RUSD will continually assess whether additional school facilities are needed, and in the event a new school facility is needed, Redlands and RUSD will undertake environmental review, and respond to current student needs and future demographic trends (Redlands 2017a). Development of schools would require project-level environmental review and site-specific mitigation measures as appropriate, ensuring that adverse environmental effects are avoided or mitigated (Redlands 2017c).

Pursuant to Section 65995 (3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees “...is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization.” State law assumes the developer’s payment of school impact fees to the local

school district, in an amount established by the school district, would address school capacity impacts. RUSD's School Facility Fees would apply to the project and the district would collect \$0.61 per square foot for covered and enclosed commercial and industrial construction (RUSD 2020b).

The project would not substantially increase enrollment at RUSD schools, and applicable development impact fees would be paid to the local school district. As such, the project would not result in substantial adverse impacts associated with schools. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.4. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

The project is not anticipated to substantially increase the population of Redlands, as the majority of future employees would likely be existing residents of Redlands and surrounding area. The General Plan establishes a parkland/recreational space standard of five acres per 1,000 residents, consistent with State law (Quimby Act). Redlands currently maintains approximately 424.2 acres of parkland in Redlands, which amounts to approximately 6.0 acres of parkland per 1,000 residents (424.2/[70,952/1,000]) (Redlands 2017a). Redlands currently exceeds its parkland goal. The closest parks to the project site are Texonia Park at the northwestern corner of Texas Street and East Lugonia Avenue (approximately 2.67 miles east of the project site), and Heritage Park at the southwest corner of Orange Avenue and Nevada Street (approximately 1.63 miles southeast of the project site).

The Redlands General Plan states that approximately 197 new acres of parkland is proposed over the next 15 years (Redlands 2017a). The project would not preclude future acquisition of these additions to increase parkland in Redlands. On the contrary, the project proposes the development of a segment of the Orange Blossom Trail adjacent to the project site. For more discussion relating to the proposed trail, please refer to Section 16, *Recreation*.

As the project would consist of industrial development, the project applicant would not be required to pay Redlands' Open Space and Parks Fee, pursuant to Redlands City Council Resolution No. 7951, which would be used to acquire parkland identified in the Redlands General Plan (Redlands 2019d). The project is expected to create approximately 409 new recurring jobs in the region. Employees are expected to predominantly be drawn from the existing workforce in the surrounding region. If the project did attract future residents to Redlands by means of employment generation, new housing development would be required to contribute to the Open Space and Parks Fee. Future parkland expansion projects would be required to undergo the appropriate level of project-specific environmental review and mitigate potentially significant environmental impacts, as necessary. Therefore, the project would not impact Redlands' ability to meet its parkland ratio goal, and this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.5. Would the project result in substantial adverse physical impacts associated with the provision of other new or physically altered public facilities, or the need for other new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

The AK Smiley Public Library is located approximately 3.3 miles southeast of the project site. The project is not anticipated to substantially increase the population of Redlands, as the majority of future employees would likely be existing residents of Redlands and surrounding area. As the project would consist of industrial development, the project applicant would not be required to pay Redlands' Open Space and Parks Fee. For other public facilities, the project applicant would be required to contribute to Redlands' Public Facilities Fee, pursuant to Redlands City Council Resolution No. 7951 (Redlands 2019d). Therefore, the proposed project would have a less than significant impact to the provision of other new or physically altered public facilities.

LESS THAN SIGNIFICANT IMPACT

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16 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>

- a. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*
- b. *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

The project would include the construction of a segment of the Orange Blossom Trail adjacent to the project, consistent with the Redlands General Plan. The Project would construct the 12-foot-wide trail section along the north and northeastern project boundary, beginning Mountain View Avenue, and continuing southeast along the western bank of the Mission Zanja flood channel, and terminating at the southeast corner of the project site. The project proposes landscaping with trees and shrubs and fencing on both sides of the trail. For details, see Section 2, *Project Description*.

The Orange Blossom Trail Master Plan was completed in 2008. Sections of the trail have been completed between Bryn Mawr Avenue and Texas Street and between Grove Street and Wabash Avenue. When complete, it will be a 7.5-mile trail that runs east to west across Redlands (Redlands 2017a). The Orange Blossom Trail Master Plan states that an existing maintenance road on the south bank of the channel provides adequate width and a graded surface for development of a multi-use trail (Redlands 2008). The trail portion of the project would not result in substantial environmental impacts since it would involve relatively minor landscaping and fencing and no removal of trees or substantial grading or filling of soil.

As discussed in Section 15, *Public Services*, Redlands currently maintains approximately 424.2 acres of parkland (Redlands 2017a). Because the project would not appreciably decrease parkland-to-resident ratios and would not interfere with Redlands' planned acquisition of additional parkland, the project would not create substantial demand on or cause substantial deterioration of area parks such that new park facilities would be required. Accordingly, the project would have a less than significant impact on recreational facilities.

LESS THAN SIGNIFICANT IMPACT

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17 Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
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 type="checkbox"/>	<input checked="" type="checkbox"/>
b. 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 use (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The analysis in this section is based on *Mountain View Industrial Development—VMT Screening Analysis*, prepared by Translutions (2020), and *Mountain View Warehouse Project Traffic Impact Analysis*, prepared by Albert A. Webb Associates (2020c), both included in Appendix K. Roadway capacity and operation, including level of service, is no longer a consideration for determination of significance and mitigation under CEQA. Thus, the capacity analysis is not addressed herein, but is provided in Appendix K for informational purposes.

a. *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

OmniTrans operates buses throughout the San Bernardino Valley. The nearest bus service is Route 8, traveling along Redlands Boulevard between San Bernardino and Yucaipa, approximately 0.3 mile south from the project site. Existing pedestrian facilities are limited to the west side of Mountain View Avenue. There are no bikeways in the project vicinity. A Metrolink rail line is currently being constructed north and west of the project site, along the far side of the drainage channel.

The project would implement half-width improvements to Mountain View Avenue along the project frontage including curbs, sidewalks, and parkways, thereby providing pedestrian connectivity from the project site to transit access to the south.

The project would also develop a segment of the Blossom Trail between the project site and the adjacent flood control channel including pedestrian and bicycle trail, and fencing, thereby contributing to the development of active transportation facilities. The trail will ultimately connect areas in San Bernardino, Loma Linda and San Bernardino, providing transportation and recreation opportunities.

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The project may result in temporary traffic impacts to Mountain View Avenue during construction, and particularly during the development of improvements to Mountain View Avenue. A traffic control plan will be prepared and submitted for City review and address temporary closures, detours, and notification of key agencies (emergency providers, etc.).

The project would not involve off-site changes to the roadway system with the potential to affect existing or planned bicycle facilities, or the operation of the future Metrolink rail line. The project would not conflict with any program, plan, ordinance, or policy addressing the circulation system. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

CEQA Guidelines Section 15064.3(b) identifies criteria for evaluating transportation impacts. Generally, VMT is the most appropriate measure of transportation impacts under this criteria. VMT refers to the amount and distance of automobile travel attributable to a project.

VMT Screening Guidelines and Analysis

The City of Redlands VMT guidelines include three types of screening that can apply to screen projects from project-level assessment. The three types of screening are described below and evaluated for proposed project.

Transit Priority Area Screening

Projects located within a Transit Priority Area may be presumed to have a less than significant impact absent substantial evidence to the contrary. This presumption may not be appropriate if the project:

- Has a Floor Area Ratio (FAR) of less than 0.75;
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
- Replaces affordable residential units with a smaller number of moderate or high-income residential units.

The project is not located within a Transit Priority Area; therefore, this screening is not applicable.

Low VMT Area Screening

Employment-related and mixed-use projects may qualify for the use of screening if the project can reasonably be expected to generate VMT per resident, per worker, or per service population that is similar to the existing land uses in the low VMT area.

For this screening, the San Bernardino Transportation Analysis Model (SBTAM), a region-specific travel forecasting model, was used to measure VMT performance for individual jurisdictions and for individual traffic analysis zones (TAZs). TAZs are geographic polygons similar to Census block groups used to represent areas of homogenous travel behavior. Total daily VMT per service population (population plus employment) was estimated for each TAZ. This presumption may not be

appropriate if the project land uses would alter the existing built environment in such a way as to increase the rate or length of vehicle trips.

To identify if the project is in a low VMT-generating area, the San Bernardino County Transit Authority (SBCTA) screening tool is reviewed, and the appropriate threshold applied within the tool. The project must be consistent with the existing land use within the TAZ, and not have any unique characteristics that would make application inappropriate.

To identify if the project is in a low VMT-generating area, the SBCTA screening tool was applied using the City's threshold of 15 percent below the baseline conditions. The results indicate that project is located within a low VMT generating area and is therefore presumed to have a less than significant impact on VMT. In addition, the project does not have any unique characteristics that would make application inappropriate.

Project Type Screening

Projects which generate less than 3,000 MT CO₂e per year can be presumed to have a less than significant impact on VMT, and include Warehousing uses that are 463,600 square feet or less.

Based on this criteria, the project size of 420,937 square feet is less than the guidelines maximum square footage of 463,600 for warehouses. Therefore, the project is presumed to have a less than significant impact on VMT.

Summary

The project is located within a low VMT generating area and is therefore presumed to have a less than significant impact on VMT. In addition, projects which generate less than 3,000 MT CO₂e per year include warehouses that are 463,600 square feet or less, are presumed to have a less than significant impact on VMT. Since the project is less than the minimum square footage for warehouses, the project is presumed to have a less than significant impact on VMT. Project impacts related to VMT would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?*

There are no unusual geometric design features, sharp curves, or dangerous intersections associated with the project. The project would involve improvements to Mountain View Avenue, a straight, north-south street that would generally improve function via new striping and improved pavement surface.

During project operation, the project would not involve any incompatible use of area roadways, nor would it substantially increase hazards for area roadways. Views of surrounding roadways would not be impacted with the development of the proposed project. Therefore, the impacts associated with hazards from a geometric design feature or incompatible would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project result in inadequate emergency access?*

The project would be designed, constructed, and operated in accordance with applicable standards outlined in the 2016 California Fire Code, as amended by the County of San Bernardino and adopted

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in Chapter 15.20 of the Redlands Code of Ordinances. Such requirements include building and emergency access, adequate emergency notification, and means of egress for emergency vehicles.

Site access for the project would be provided via the two driveways on Mountain View Avenue and a fire lane that would encircle both buildings with a 20-foot-wide minimum width. As discussed under Checklist Item "a" of this section, the peak hour project trip generation falls below the threshold for intersection analysis and therefore would not degrade the LOS at any intersections in the vicinity of the project site that could impair emergency vehicle access. Project construction may require temporary changes to the on-site circulation network; however, construction would not require roadway closures that would impair emergency response or evacuation. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

18 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- | | | | | |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|
| <p>a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or</p> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

On July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted, expanding CEQA by defining a new resource category, “tribal cultural resources.” AB 52 states, “A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment” (Public Resources Code Section 21084.2). It further states the lead agency shall establish measures to avoid impacts altering the significant characteristics of a tribal cultural resource, when feasible (Public Resources Code Section 21084.3).

Public Resources Code Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” and is:

1. Listed or eligible for listing in the CRHR or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or
2. 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 these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

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AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified or adopted. Under AB 52, lead agencies are required to “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.” Native American tribes to be included in the process are those having requested notice of projects proposed in the jurisdiction of the lead agency.

In March 2020, Redlands distributed AB 52 consultation letters for the proposed project, including project information, map, and contact information, to the five Native American contacts on the City’s AB 52 consultation list including:

- Gabrieleno Band of Mission Indians
- San Manuel Band of Mission Indians
- Morongo Band of Mission Indians
- Soboba Band of Luiseno Indians
- Torres-Martinez Desert Cahuilla Indians

In response, Redlands received request for consultation from Soboba Band of Luiseno Indians and San Manuel Band of Mission Indians.

- a. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is 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)?*
- b. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is 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?*

The City consulted with two tribes: Soboba Band of Luiseno Indians and San Manuel Band of Mission Indians. Neither of the consulting tribes provided information or evidence documenting any potentially significant impacts due to known or unknown burial sites, village sites, camp sites, trading routes or sites, significant landscapes or other features. However, the City has agreed to provide mitigation measures that the tribes have requested, to ensure that potential impacts related to inadvertent discoveries remain less than significant.

Mitigation Measure

With implementation of the following, or a similar mitigation measure, potential impacts related to tribal cultural resources would be reduced to less than significant.

TCR-1 Monitoring and Treatment Plan

Any and all cultural documents created as a part of the project (Monitoring and Treatment Plans, isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency and disseminated to consulting tribes for review. The Monitoring and Treatment Plan shall incorporate:

1. Project grading and development scheduling.

2. A rotating monitoring schedule during all ground disturbing activities, including but limited to, all site preparation/construction/demolition-based activities, testing and data recovery on the project site. The monitoring plan shall include scheduling, safety requirements, duties, scope of work, and the Native American Tribal Monitor's authority to stop and redirect grading activities in coordination with the project Archaeologist.
3. The protocols and stipulations that the Applicant, City of Redlands, Native American Tribal Monitor(s) and project archaeologist shall follow in the event of previously unknown cultural resources discoveries that could be subject to a cultural resources evaluation.

TCR-2 Tribal Monitoring

Native American Monitor(s) from the consulting tribe(s), who wish to partake in monitoring, shall be present during all ground disturbing activities, on a simultaneous or rotating basis, based on the scope of work; including but not limited to, all site preparation/construction/demolition-based activities, testing and data recovery. Monitoring agreements with the consulting tribe(s) shall be provided to the City prior to issuance of a grading permit.

TCR-3 Treatment and Disposition of Tribal Cultural Resources

In the event that tribal cultural resources, including historic and pre-contact materials, are discovered during the course of ground disturbance, the following procedures shall be implemented:

1. All work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and the find shall be assessed by a qualified archaeologist meeting the Secretary of the Interior's standards. Work on the other portions of the project, outside of the buffered area, may continue during this assessment period.
2. Notification and information regarding the nature of the find shall be made to all consulting tribe(s).
3. Temporary Curation and Storage: During construction, any cultural resources discovered shall be temporarily curated in a secure onsite location, as determined appropriate with consideration of input from consulting tribe(s). The removal of any cultural resources from the project site shall be subject to approval by the City in consultation with the consulting tribe(s), thoroughly inventoried and overseen by their designated Native American Tribal Monitor(s).
4. Treatment and Final Disposition: The Applicant shall relinquish ownership of all cultural resources, including sacred items, burial goods, archaeological artifacts, and non-human remains discovered during construction of the proposed project. The Applicant shall relinquish the cultural resources through one or more of the following methods and provide the City of Redlands with evidence of same:
 - a. Accommodate the onsite reburial of the discovered cultural resources in consultation with the consulting Native American tribe(s) or band(s). The reburial area shall be protected from any future impacts. All reburials are subject to a reburial agreement that shall be developed between the landowner and the consulting tribes outlining the determined reburial process/location, and shall include measures and provisions to protect the reburial area from any future impacts (vis a vis project plans, conservation/preservation easements, etc.). Reburial shall not occur until all cataloguing and recordation have been completed.

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- b. In the event that reburial is infeasible, and/or if more than one Native American tribe or band is involved with the proposed project and cannot come to a consensus as to the disposition of cultural resources within one hundred and twenty (120) days from the initial recovery of the items, the cultural resources shall be curated. The landowner shall relinquish all ownership and rights to this material and confer with the consulting tribes to identify an American Association of Museums (AAM)-accredited facility within the County that can accession the materials into their permanent collections and provide for the proper care of these objects in accordance with the 1993 CA Curation Guidelines. A curation agreement with an appropriate qualified repository shall be developed between the landowner and museum that legally and physically transfers the collections and associated records to the facility. This agreement shall stipulate the payment of fees necessary for permanent curation of the collections and associated records and the obligation of the Project developer/applicant to pay for those fees.
- c. Within 60 days following the completion of ground disturbing activities, a Phase IV Monitoring Report shall be submitted to the City of Redlands. The Monitoring Report shall document monitoring activities conducted by the Project Archaeologist and Native Tribal Monitor(s) including: any impact to cultural resources discovered on the project site; how each mitigation measure was fulfilled; the type of cultural resources recovered and the disposition of such resources; evidence of completion of pre-grading cultural sensitivity training required for the construction staff; and daily/weekly monitoring notes from the archaeologist in a confidential appendix. The Phase IV Monitoring Report shall be submitted to the City of Redlands, the South Central Coastal Information Center, and the consulting tribe(s).

TCR-4 Discovery of Human Remains

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

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

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

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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19 Utilities and Service Systems

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

a. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

Water Facilities

The project would require temporary water supply for construction activities, such as dust suppression and concrete manufacturing, as well as long-term operational supply for indoor potable uses, outdoor landscaping, and fire suppression. According to the proposed landscaping plan, new plants would be drought-tolerant, and the project would be equipped with a low-flow irrigation

system consisting of a weather-based smart controller, low-flow rotors, bubbler, and/or drip system to meet or surpass State requirements; see landscape plan in Appendix A.

The project site would be served by existing Redlands' 20-inch diameter potable water distribution pipeline along Mountain View Avenue. New potable lateral extensions, valves, and other appurtenances would be necessary to serve the proposed warehouse structures and landscaping. The project proposes a new potable water line lateral under the parking area adjacent to the southern end of Building 1, that would extend east from the existing water line under Mountain View Avenue to the eastern limit of the building. Additional water laterals would extend from the existing pipeline to the western ends of the warehouse buildings (see preliminary grading plan in Appendix A). In addition, new fire hydrants would be installed pursuant to California Fire Code Section 914.12, reflected in Redlands Fire Code Section 15.20.500.

The proposed water main, laterals, fire water lines, and hydrants would be installed prior or during project construction and within the disturbance area of the project; therefore, the construction of these infrastructure improvements would not substantially increase the project's disturbance area, associated emissions, or otherwise cause significant environmental effects beyond those identified throughout this document. It is not anticipated that new or improved Redlands' water treatment facilities or distribution main line improvements would be required to serve the project site. Therefore, impacts with respect to new or expanded water facilities would be less than significant.

Wastewater Treatment

The project site is served by existing Redlands' sewer lines, including a 15-inch vitrified-clay-pipe trunk sewer line along Mountain View Avenue (Redlands 2020c). A new potable water line lateral would extend east from the existing water line under Mountain View Avenue, under the parking area, to the southern end of Building 1. Additional water laterals would extend from the existing pipeline to the western ends of the warehouse buildings; see preliminary grading plan in Appendix A. As with water facilities, sewer line extensions necessary to serve the proposed future buildings would be installed in conjunction with the road improvements within the Mountain View Avenue right-of-way. As such, construction of these wastewater treatment facilities would not result in potentially significant environment impacts beyond those identified throughout this document.

The project would result in an increase in wastewater generation relative to existing site conditions. Wastewater generated in Redlands is treated at the Redlands Wastewater Treatment Facility at 1950 Nevada Street, approximately 2.0 miles northeast of the project site. Wastewater generation for light industrial uses is approximately 1,500 gallons/day (County of San Bernardino 2019b). Using this rate, the estimated wastewater generation of the project would be approximately 33,750 gallons/day,⁷ or 0.034 million gallons per day (MGD).

Table 25 summarizes the available capacity at the Redlands Wastewater Treatment Facility and the percentage used by anticipated project wastewater generation.

⁷ 1,500 gallons/acre/day x 22.2 disturbed acres.

Table 25 Wastewater Treatment Plant Capacity

Description	Amount
Average Daily Treatment ¹	6.0 MGD
Permitted Capacity	9.5 MGD
Available Capacity	3.5 MGD
Project Wastewater Generation ²	0.034 MGD
Percent of Available Capacity Used by Project	0.09 percent

MGD = million gallons per day
 Sources: Redlands n.d.

As shown in Table 25, wastewater treatment facilities operated by Redlands possess sufficient capacity to process additional wastewater generated by the project. The project proponent would construct on-site wastewater treatment pipe connections and pay standard sewer connection fees to Redlands. Consequently, impacts with respect to wastewater treatment facilities would be less than significant.

Stormwater Drainage

As discussed in Section 10, *Hydrology and Water Quality*, the project would increase impervious surfaces over the project site due to construction of the proposed warehouse structures, hardscaped parking spaces, and driveways. Consequently, the project would reduce infiltration potential and increase surface runoff on the project site. Based on the preliminary WQMP provided by the applicant, the project would be required to retain a runoff volume of approximately 73,919 cubic feet associated with a 0.95 inch, 24-hour rainfall event (Albert A. Webb Associates 2020d).

On-site flows generated by the proposed project would surface flow through the site utilizing ribbon gutters, curb and gutters, and grate inlets. The project proposes three subsurface storm drain lines that would be used to collect and convey runoff generated by the project site to the proposed on-site infiltration basin near the middle of the site along the easterly property line. Once water quality treatment is detained, excess runoff will outlet into the existing Mission Zanja flood control channel. The proposed basin would serve to treat water quality requirements and to mitigate for a two-year, 24-hour, storm event. The infiltration basin would propose an outlet structure to allow any excess runoff above the required water quality volume to exit the site. In the event of failure or improper maintenance of the infiltration basin, the outlet structure would also serve as an emergency spillway using grates at the top of the structure (Albert A. Webb Associates 2020e). As a result, upgrades to off-site, downstream drainage facilities are not anticipated. As with water and wastewater facilities, proposed storm drain infrastructure would be constructed within the disturbance area of the project and would not result in substantial additional environmental impacts. Given that the project would capture and retain on-site runoff from the 100-year storm event, off-site improvements to the storm drain network would not be necessary. As such, impacts related to new or expanded stormwater facilities would be less than significant.

Electric Power, Natural Gas, and Telecommunications

Connections for electricity, gas, and telephone service would be made at existing supply lines, junction boxes, and/or control panels adjacent to the project site along Mountain View Avenue. The buildings would be equipped with solar-ready conduits for future photovoltaic panels. SCE transmission lines and eight transmission poles are located along the western border of the project site along Mountain View Avenue, which would remain in place. Substantial additional ground disturbance, grading, or use of heavy equipment beyond that necessary for the project construction would not be anticipated. Additionally, the existing high-pressure natural gas distribution line extending through Mountain View Avenue would remain protected in place.

As discussed in Section 6, *Energy*, the project would increase electricity and natural gas demand on the project site. However, such increased demand would account for a minimal fraction of SCE's and SCG's total demand in the region. The nominal increase in energy demand is not anticipated to require additional electricity substations or natural gas storage/transmission facilities beyond those currently serving the Redlands area. Impacts with respect to new or expanded electric power or natural gas facilities would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

Redlands is a member of the SBVMWD, which produces a regional Urban Water Management Plan (UWMP) inclusive of its member agencies. Redlands currently serves approximately 24,000 customers with a five-year average potable water demand of 26,165-acre feet per year (AFY). Currently, the majority of water is obtained from the Santa Ana River, Mill Creek, and groundwater. Redlands operates two surface water treatment plants, 20 wells, 37 booster pumps, 18 reservoirs, and 400 miles of transmission and distribution lines to provide water to its customers. The majority of the water demand in Redlands (68 percent) is from residential use (SBVMWD 2015). Redlands also operates facilities to distribute non-potable raw and recycled water; the project site is not currently served by non-potable water distribution infrastructure.

Imported water from the State Water Project (SWP) is available through Redlands' wholesale water supplier, SBVMWD, a state water contractor with annual entitlement to SWP water of 102,600 AFY. Redlands has purchased supplemental SWP water only in years when surface flows have not been able to meet demands and on occasion when surface water supplies are turbid and require blending. Redlands will continue to request SWP water in these situations, but fully understands its obligation to have backup capacity and conservation measures in place during SWP outages or extended dry periods. Further, in extremely dry periods, the State has had allocations of zero. If this condition occurs in a future year when Redlands desires SWP water, groundwater resources will be utilized in addition to aggressive conservation measures, if needed, to satisfy and reduce demands. Additionally, because of steps set forth in the IRWMP, it is expected the groundwater basin will be subsequently recharged with SWP water or native water in wet years when excess water is available. Based on a 10-year average, purchased imported water, used by Redlands at its treatment plants, totals three percent of Redlands' annual water production (SBVMWD 2015).

Redlands can produce water from the Bunker Hill subbasin and Yucaipa subbasin. The Upper Santa Ana Valley Groundwater Basin is an alluvial groundwater basin fed by multiple tributaries, including the Santa Ana River and Mill Creek, both located within Redlands' service area. The Bunker Hill subbasin has a surface area of approximately 89,600 acres and a groundwater storage capacity of

5,976,000 acre-feet. Groundwater from Bunker Hill currently represents just over half of Redlands' annual water production. The Yucaipa subbasin has a surface area of 25,300 acres and a groundwater storage capacity of 808,000 acre-feet. Due to recent drought conditions and increased utilization of groundwater, Bunker Hill's water table has dropped, resulting in the lowering of one well pump in Redlands' service area. In order to prevent critical reductions in groundwater levels, Redlands participates in the IRWMP for the region to manage groundwater (SBVMWD 2015). Redlands has two wells located within the Yucaipa subbasin. Due to high levels of nitrate and perchlorate in the area, water pumped from these wells is primarily used for irrigation and only in recent dry years. This subbasin has history of being in overdraft. Although the subbasin is not adjudicated, a groundwater management plan is currently underway to proscribe collective management of the basin (SBVMWD 2015).

According to the UWMP, groundwater from the Bunker Hill subbasin is expected to account for over 60 percent of Redlands' supply in 2040, while surface water would account for approximately 22 percent. The remainder would be from purchased/imported water and recycled water (SBVMWD 2015).

Water would be required for temporary construction activities on the project site, including dust suppression, grading and grubbing, compaction, construction equipment wheel washing, and concrete mixing and casting. Water consumption by construction workers and cleaning of portable toilets on the project site may also account for a small portion of overall construction water demand.

Project water use would consist of indoor and outdoor water use. Indoor water use would include that associated with building plumbing and industrial processes occurring in proposed facilities. The project would comply with all requirements of CalGreen, as adopted by Redlands in Section 15.04 of the Municipal Code, pertaining to maximum flow rates for plumbing fixtures, such as toilets, showerheads, and faucets in non-residential buildings. Outdoor water use would consist of landscape irrigation. As discussed above, the project's landscape plan features drought-tolerant plants, including low water use trees, shrubs, and ground cover. Landscaping would be maintained via a low-flow irrigation system.

According to CalEEMod outputs (Appendix C), the project would require an estimated 78.2 million gallons of water per year, or approximately 240 AFY. The SBVMWD UWMP describes Redlands' existing water system and projects future water supplies and demands over a 25-year planning horizon. The UWMP water supply estimates are based on existing supplies and planned supply augmentation projects. Demand projections are based on multi-jurisdictional land use data and land use-based demand assumptions. Table 26 summarizes Redlands' normal year supply and demand, as well as the project's share of anticipated excess supply.

Table 26 City of Redlands Projected Normal Year Supply and Demand in AFY

Description	2020	2025	2030	2035	2040
Purchased/Imported supply	1,500	2,000	2,500	3,000	3,000
Groundwater supply	41,496	41,564	41,632	41,696	41,696
Surface Water supply	14,000	14,000	14,000	14,000	14,000
Recycled Water supply	5,152	5,402	5,402	5,402	5,402
Total Supply	62,148	62,966	63,534	64,098	64,098
Redlands Projected Demand ¹	33,138	34,164	34,940	35,715	35,715
Project Demand ²	78.2	78.2	78.2	78.2	78.2
Project Percentage of Excess Supply ³	0.2	0.2	0.2	0.2	0.2

AFY = acre-feet/year (one AF = 325,850 gallons)

¹ Includes demand for potable, raw, and recycled water.

² Project demand obtained from CalEEMod (Appendix C)

³ Project demand's share of excess supply based on difference between Total Supply and Redlands Projected Demand.

Source: SBVMWD 2015

The 2015 UWMP also estimates Redlands supplies and demand for single and multiple dry-year scenarios based on historic dry years experienced by Redlands. Table 27 compares anticipated single and multiple dry-year supply and demand and the project's anticipated share of excess dry-year supply.

Table 27 City of Redlands Single and Multiple Dry-Year Supply and Demand

Description	2020	2025	2030	2035	2040
Single Dry Year Supply (AFY)	53,831	54,645	55,208	55,767	55,767
Single Dry Year Demand (AFY)	30,142	30,978	31,813	32,649	32,649
Difference (AFY)	23,689	23,667	23,395	23,118	23,118
Project Percentage of Excess Supply ¹	0.3	0.3	0.3	0.3	0.3
Multiple – First Dry Year Supply (AFY)	58,936	59,754	60,322	60,886	60,886
Multiple – First Dry Year Demand (AFY)	26,155	26,880	27,605	28,330	28,330
Difference (AFY)	32,781	32,874	32,717	32,556	32,556
Project Percentage of Excess Supply ¹	0.2	0.2	0.2	0.2	0.2
Multiple – Second Dry Year Supply (AFY)	56,861	57,676	58,240	58,801	58,801
Multiple – Second Dry Year Demand (AFY)	28,944	29,747	30,549	31,351	31,351
Difference (AFY)	27,917	27,929	27,691	27,450	27,450
Project Percentage of Excess Supply ¹	0.3	0.3	0.3	0.3	0.3
Multiple – Third Dry Year Supply (AFY)	53,831	54,645	55,208	55,767	55,767
Multiple – Third Dry Year Demand (AFY)	30,142	30,978	31,813	32,649	32,649
Difference (AFY)	23,689	23,667	23,394	23,118	23,118
Project Percentage of Excess Supply ¹	0.3	0.3	0.3	0.3	0.3

AFY = acre-feet/year (one AF = 325,850 gallons)

¹ Assumes total project demand of 78.2 AFY.

Source: SBVMWD 2015

The project would increase water demand on the site. As demonstrated in Table 26 and Table 27, anticipated increased demand would account for 0.2 to 0.3 percent of Redlands' excess normal, single, and multiple dry-year supplies through 2040. As a result, adequate supplies are available to serve the project, and remaining excess supply would be available to serve reasonably foreseeable future development. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *Would the project 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?*

As discussed under Checklist Item a. of this section, project-generated wastewater would be adequately served by available capacity at the Redlands Wastewater Treatment Facility. As such, the project would not result in a determination by the wastewater treatment provider that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*
- e. *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

Construction and operation of the project would generate solid waste. Redlands provides solid waste and recycling collection services for the project site. Solid waste generated in Redlands is disposed of at California Street Landfill operated by the Quality of Life Department and the San Timoteo Sanitary Landfill operated by San Bernardino County. The California Street Landfill has a maximum permitted throughput of 829 tons per day. Its maximum permitted capacity is 10 million cubic yards, of which 4,800,000 cubic yards remain. The San Timoteo Sanitary Landfill has a permitted capacity of 20,400,000 cubic yards and a maximum daily throughput of 2,000 tons. Its remaining capacity is 13,605,388 cubic yards (Redlands 2017c).

The handling of all debris and waste generated during construction of the project would be subject to 2016 CALGreen requirements and the California Integrated Waste Management Act of 1989 (AB 939) requirements for salvaging, recycling, and reuse of materials from construction activity on the project site. In accordance with 2016 CALGreen requirements, the project would be required to achieve a minimum of 65 percent diversion rate for construction waste.

For operational waste, AB 939 requires all cities and counties to divert a minimum of 50 percent of all solid waste from landfills. According to the CalEEMod outputs for the project (Appendix C), the project would generate approximately 150.4 tons per year of solid waste, or approximately 0.41 tons per day. The project's anticipated daily solid waste generation would account for approximately 0.05 percent of the California Street Landfill's permitted throughput and 0.02 percent amount of the San Timoteo Sanitary Landfill's permitted throughput. Given this small proportion of permitted throughput and the existing surplus capacity at area landfills, the solid waste generated by operation of the project would be adequately accommodated by existing landfills.

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The project would comply with Redlands' Solid Waste Ordinance, codified in Chapter 3.66 of the Redlands Municipal Code, which regulates waste collection, fees, transfer, and disposal in Redlands. The project would be required to comply with federal, State, and local statutes and regulations related to solid waste. Because the project would be served by landfills with sufficient capacity and would comply with applicable regulations related to solid waste, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

20 Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from 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 downslopes 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"/>

Fire Severity and Risk

San Bernardino County features a combination of climate types, ranging from hot summer Mediterranean and hot semi-arid in the valley region to hot desert in many other locations. The entire County is susceptible to extremely hot and dry summers. While wildfire can start from both natural and human ignitions, climate change is expected to exacerbate wildfire risk by creating hotter and drier landscapes more susceptible to burning. Droughts are expected to become more frequent and intense in San Bernardino County. The largest increases in wildfire risk may occur in communities near the San Bernardino and San Gabriel Mountains in and adjacent to the Mountain region and in the eastern area of the County (San Bernardino County 2019). Redlands is also subject to extremely strong winds, commonly referred to as “Santa Ana Winds,” which can reach speeds of more than 40 miles per hour (Redlands 2016).

While a natural ecological process in coastal chaparral and forest systems, wildfire return intervals have decreased throughout southern California, resulting in more frequent ecological disturbance, loss of biodiversity, and colonization by non-native grass species (United States Forest Service 2018).

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Furthermore, post-fire conditions leave exposed mountain slopes and hillsides vulnerable to surface erosion and runoff. Debris flows during post-fire rainy seasons can pose a risk to life and property and occur with little warning. In southern California, as little as 0.3 inch of rain in 30 minutes can produce debris flows on post-fire landscapes (United States Geological Survey 2018).

Redlands is in a highly urbanized area of San Bernardino County, which limits the spread of large, uncontrolled wildfires. However, Redlands is prone to regular brush fires, particularly during summer heat waves, which can pose a safety risk. Recent major wildfires in the project site vicinity include:

- Bruder Fire, October 2020, involving 170 acres, originating in San Timoteo Canyon and encroaching into south Redlands.
- El Dorado Fire, September to November 2020, involving 22,744 acres, originating on Yucaipa Ridge, and affecting Oak Glenn, Yucaipa, Banning, and mountain communities. The fire was approximately 1.3 miles east of the City of Redlands northeastern boundary near Mentone.
- Other fires near San Timoteo Canyon have included an 11-acre fire in 2019, a 21-acre fire in 2015, and a 150-acre brush fire in 2013. (Inciweb 2020, CAL FIRE 2020.)

The project site is undeveloped in an area with residential, commercial, and industrial uses. The project site is not located in a designated Very High Fire Hazard Severity Zone (VHFHSZ) or a State Responsibility Area (SRA). The areas of Redlands most prone to wildfire are in southern and eastern areas of Redlands, not located near the project site (CAL FIRE 2008).

Fire and Emergency Services and Programs

The project site is located in an area serviced by the San Bernardino County Fire Department (SBCFD) Division 2. The closest station to the project site is Station 231 at 450 East Vanderbilt Way (approximately 1.84 miles west of the project site). Access to the project site would be provided by local roadways and I-10. The Wildland Section of the SBCFD Special Operations Division consists of hand crew firefighters and Heavy Fire Equipment Operators that are skilled at Fire Hazard Fuels reduction and wildfire suppression tactics. These specialized firefighters assist the fire suppression forces that are assigned to traditional fire stations. The Heavy Fire Equipment Operations program uses bulldozers and other specialized equipment to aid in fire suppression, emergency flood mitigation and hazardous fire fuel reduction when needed. The SBCFD also provides training programs, emergency medical education, and a helicopter program (SBCFD 2020).

Emergency Management in the Redlands is coordinated within the Fire Department. The Fire Suppression & Operations Division of the RFD is responsible for putting out fires, emergency rescues and medical emergency response. The four fire stations in Redlands are staffed 24-hours per day, seven days per week to ensure quick response times to keep fire damage to a minimum. Community Risk Reduction personnel conduct weed abatement inspections in the high fire hazard areas in Redlands twice a year (Redlands 2020a). Redlands' Municipal Utilities and Engineering Department is a member of the Emergency Response Network of the Inland Empire (ERNIE), which facilitates public agency preparedness for, response to, and recovery from local and regional disasters to ensure the delivery of critical public services through mutual aid, communications, and compliance with state and federal emergency standards (East Valley Water District 2020).

Fire Code Regulations

The California Building Standards Commission developed the California Fire Code as part of Title 24, Part 9 of the California Code of Regulations. The California Fire Code establishes building and equipment design features for all buildings and occupancies, installation or maintenance of associated infrastructure, and access to emergency services to limit risks associated with fires (California Building Standards Commission 2016).

Redlands adopted the California Fire Code with amendments due to climatic, geological and topographical conditions including low precipitation and high temperatures, extremely strong “Santa Ana winds,” location of earthquake faults, and traffic congestion. Amendments to the California Fire Code regard the following issue areas: high fire hazard areas; water supplies; fire extinguishing systems and sprinkler systems, and the storage, handling and use of flammable and combustible liquids and hazardous materials.

The California Fire Code, as amended by Redlands, establishes regulations affecting or relating to structures, processes, premises, and safeguards regarding:

- Conditions affecting the safety of the firefighters and emergency responders during emergency operations
 - Fire hydrant systems, water supply, fire equipment access, posting of fire equipment access, parking, lot identification, weed abatement, and combustible brush and vegetation that represents an imminent fire hazard, debris abatement, combustible storage abatement including flammable liquid storage, and hazardous material storage and use (Redlands 2016).
- a. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

The project would not be located in or near a CAL FIRE recommended VHFHSZ or SRA. Site access for the project would be provided via Mountain View Avenue. As discussed in Section 17, *Transportation*, the project would not impede access to emergency services. The project would be designed, constructed, and operated pursuant to applicable standards outlined in the 2016 California Fire Code, as amended by Redlands, and adopted in Chapter 15.20 of the Redlands Code of Ordinances. Such requirements include building and emergency access, adequate emergency notification, and means of egress for emergency vehicles.

While project construction may require temporary truck and equipment access and parking on the project site, construction would not require lane or roadway closures that would temporarily impair emergency response or evacuation. Therefore, there would be no impact.

NO IMPACT

- b. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, 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?*

As discussed above, the project is not located in or near a designated VHFHSZ and would not be situated near slopes or create slopes. The project would adhere to applicable standards outlined in the 2016 California Fire Code, as amended by Redlands to increase prevention and protection efforts due to impacts from the “Santa Ana” winds and other conditions that may increase the

propensity and intensity of wildfires. Therefore, the project would not exacerbate wildfire risks, and would not expose occupants to pollutant concentrations or the uncontrolled spread of wildfire. No impact would occur.

NO IMPACT

- c. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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?*

As discussed above, the project is not located in or near a designated VHFHSZ. As discussed in Section 19, *Utilities and Service Systems*, the project would not result in significant environmental effects associated with the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities. The project would require installation of additional water and sewer laterals or appurtenances to serve the proposed buildings and landscaping. New or relocated utilities and systems associated with the project would comply with state and local fire codes to reduce the risk of fires, and none of these potential infrastructure improvements would exacerbate fire risk on-site. No impact would occur.

NO IMPACT

- d. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

As discussed above, the project is not located in or near a designated VHFHSZ. As discussed in Section 7, *Geology and Soils*, no portion of the project site is located in a landslide hazard area, and the project does not propose any hills. The project would be required to implement all recommendations of the geotechnical report through the Redlands' design review process. Implementation of the recommendations from the site-specific geotechnical analysis in the design and construction of the project would reduce potential hazards from post-fire landslides or slope instability. The project is not located in a flood hazard, tsunami, or seiche zone where project inundation could result in the release of pollutants. There would be no impact.

NO IMPACT

21 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Does the project:				
a. 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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?*

The project site provides little habitat for wildlife species due to its developed and disturbed nature, lack of native vegetation and high levels of surrounding human activity, and would not support special status plant species. However, the site has low quality or marginal foraging and/or nesting habitat for California horned lark (CDFW Watch List), and burrowing owl (CDFW Species of Special Concern). Mitigation Measures BIO-1 and BIO-2, as identified in Section 4, *Biological Resources.*, require nesting bird clearance surveys and protection measures to reduce potential impacts to nesting birds to less than significant.

Records search and physical survey of the project did not identify any historic or archaeological resources associated with the project site. Although the project site does not lie in a highly sensitive area for archaeological resources, there remains the potential to encounter unanticipated archaeological resources during ground-disturbing activities associated with project construction. Implementation of Mitigation Measure CUL-1 and CUL-2, as identified in Section 5, *Cultural Resources*, would reduce potential impacts to archaeological resources to less than significant by providing direction on how to properly address an unanticipated discovery of archaeological resources should one occur during construction.

As discussed in Section 18, *Tribal Cultural Resources*, the project site may contain tribal cultural resources. Mitigation Measures TCR-1 through TCR-4 would reduce impacts to tribal cultural resources to a less than significant level. This impact would be less than significant with mitigation incorporated.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- b. *Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*

As described in the discussion of environmental checklist Sections 1 through 20, the project would have no impact, a less than significant impact, or a less than significant impact with mitigation incorporated with respect to all environmental topics evaluated. Cumulative impacts may occur under several environmental issue areas, including: Air Quality, Greenhouse Gases, and Transportation. As noted in Section 3, Air Quality, with the implementation of Mitigation Measure AQ-1, the project would not result in a cumulatively considerable net increase of criteria pollutants, as project construction and operation would remain below SCAQMD daily thresholds. Impacts related to GHG emissions are cumulative in nature and, as discussed in Section 8, Greenhouse Gas Emissions, the project would result in a less than significant impact. As discussed in Section 17, Transportation, the project site is within a low VMT-generating areas; in addition, because the project is less than the maximum screening square footage for warehouses, it is presumed to have a less than significant impact on VMT on both a project and cumulative basis.

Resource topics that were determined to have no impact would not have potential to be cumulatively considerable, and the project would not contribute to cumulative impacts related to these issues.

Resource topics that are project-specific by nature, such as mineral resources, agriculture, and wildfire, would not have substantial contributions to the cumulative scenario, as impacts at one location do not add to impacts at other locations or create additive impacts. Furthermore, future projects in the vicinity of the project site would be required to undergo the appropriate level of environmental review and mitigate potential impacts, as necessary. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

In general, impacts to human beings are associated with air quality, hazards and hazardous materials, and noise impacts. As discussed in Section 3, *Air Quality*, with the implementation of Mitigation Measure AQ-1, the project would result in less than significant impacts related to emissions of criteria pollutants, toxic air contaminants, or odors. As detailed in Section 9, *Hazards and Hazardous Materials*, the project site contains impacts soils. Mitigation Measure HAZ-1 will require the implementation of a soil management plan to address construction worker safety, and inadvertent discovery of further impacted soils, and reduce impacts to hazardous materials to less than significant. Impacts related to other hazards, including wildfire or proximity to San Bernardino International Airport, would be less than significant. As discussed in Section 13, *Noise*, temporary noise impacts associated with construction equipment and operation would be less than significant. In addition, compliance with applicable rules and regulations and mitigation measures contained in this document would reduce potential impacts on human beings. Therefore, impacts would be less than significant with mitigation incorporated.

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