1. **Project Title:** 1101 California Street Warehouse

2. **Lead Agency Name and Address:**
City of Redlands
Development Services Department
35 Cajon Street, Suite 20
Redlands, CA 92373

3. **Contact Person and Phone Number:**
Kevin Beery, Senior Planner
Email: kbeery@cityofredlands.org
Phone: (909) 798-7555 ext. 2

4. **Project Location:** The Project Site is located at the southwest corner of Lugonia Avenue and California Street and has an address of 1101 California Street, Redlands, CA (refer to Figure 1: Regional Location Map; and Figure 2: Vicinity Map). The Project Site includes two Assessor's Parcel Numbers (APN) 0292-033-11 and 0292-033-13.

5. **Project Sponsor's Name and Address:**
CRP/NPP Redlands Industrial Owner, LLC
1330 Factory Place, Suite 105
Los Angeles, CA 90013

Pete Williams
Email: pete.williams@northpalisade.com
Phone: (818) 468-0566

6. **General Plan Designation:** Commercial/Industrial

7. **Zoning:** East Valley Corridor Specific Plan – Special Development (EV/SD)

8. **Project Description:**

The Proposed Project consists of a new warehouse development located directly north of Interstate 10 (I-10) and the California Street westbound on-ramp.

Project improvements include the construction of a new 357,610 square-foot (SF) warehouse that includes 6,000 SF of Administration/Office Space (refer to Figure 3: Site Plan). Access to the Project Site would be available via two proposed driveways to the north on Lugonia Avenue and two driveways to the east on California Street. The proposed

driveways on Lugonia Avenue include a 40-foot driveway to the west and a 30-foot driveway to the east. California Street has two existing driveways including a 28' 2" driveway to the north and a 56' 4" driveway to the south. The Proposed Project would include 47 dock doors on the western side of the warehouse which would be 9 feet x 10 feet, with sectional overhead doors, and classified as standard grade. Demolition activities would include removal of remaining concrete paving and k-rails, the remains of former amusement park attractions, and landscaping left from prior development.

The building would be a concrete tilt-up building, consisting of a concrete slab-on grade floor and a shallow foundation system. The maximum building height would be 49 feet from grade. It is anticipated that future items to be stored for distribution would include non-hazardous, non-flammable products on high-pile storage pallet racking and shelving.

Additional site improvements would include a trash enclosure, updated driveway improvements on California Street and additional driveways on Lugonia Avenue, new site access gates with an eight (8) foot high concrete screen wall encompassing the western parking lot and docking area, eight (8) foot high security and maintenance fencing along the western boundary, and approximately 82,104 square feet of improved landscape areas. Paved areas would include employee parking, storage racks, bike racks, bike lockers, loading docks, and internal roadways, totaling approximately 623,779 square feet or 14.32 acres. The Proposed Project will also include minor utility connections necessary to serve the new development.

The Proposed Project would include a total of 396 parking spaces. Specifically, 308 would be standard parking spaces, 6 standard accessible, 2 van accessible, 40 Electric Vehicle (EV) Capable spaces, 33 Electric Vehicle Charging Stations (EVCS) provided with Electric Vehicle Supply Equipment (EVSE), 3 EVCS standard accessible with EVSE, 1 EVCS van accessible with EVSE, and 3 spaces would be EVCS ambulatory with EVSE.

9. Surrounding Land Uses and Setting:

The Project Site includes two parcels, APNs 0292-033-11 and -13, encompassing approximately 16 acres. The site was formerly developed as the Splash Kingdom amusement park, which was demolished in 2021, and currently features the remains of the former water park's abandoned attractions and structures.

The Project Site is located in an area primarily associated with commercial, industrial, and agricultural uses. It is surrounded by commercial development and industrial distribution centers to the north and west. Offices, commercial, medical, and institutional uses are located to the east. The I-10 and Metrolink route is directly south of the Project Site, with an orange grove and gas station occurring beyond I-10.

The Project Site and surrounding parcels are located in the East Valley Corridor Specific Plan area. The Project Site has a land use designation of Commercial/Industrial and a specific plan designation of East Valley – Special Development (EV/SD) (refer to table below for additional information).

	Land Use	General Plan	Zoning
Project Site	**Vacated water park structures**	**Commercial/Industrial**	**Special Development (EV/SD)**
North	Commercial and Industrial	Commercial/Industrial	Concept Plan (CP-1)
South (across I-10)	Agriculture and Commercial	Agriculture	General Commercial (EV/CG)
East	Commercial and Vacant	Commercial and Agriculture	General Commercial (EV/CG); Specific Plan 29 (SP29); and Open Space (EV/OS)
West	Industrial	Commercial/Industrial	Planned Development (PD3)

Vegetation on-site consists mainly of non-native weedy species with ornamental landscaping (introduced trees, shrubs, etc.) remaining from the abandoned water park, along the property boundaries and scattered throughout the Project Site.

10. Other public agencies whose approval is required:
Regional Water Quality Control Board, Santa Ana Region

11. Required Permits and Approvals:

- Planned Development
- Lot Line Adjustment / Merger
- Socio-Economic Cost/Benefit Study

12. Related Technical Reports (incorporated by reference): The technical studies/reports referenced and summarized herein is also available for review on the City's website (https://www.cityofredlands.org/post/environmental-documents), and are listed in the References section at the end of this Initial Study.

N

0 1 Mile

LILBURN CORPORATION

REGIONAL VICINITY

1101 CALIFORNIA STREET WAREHOUSE

City of Redlands, California

FIGURE 1

N

0 2.5
Mile

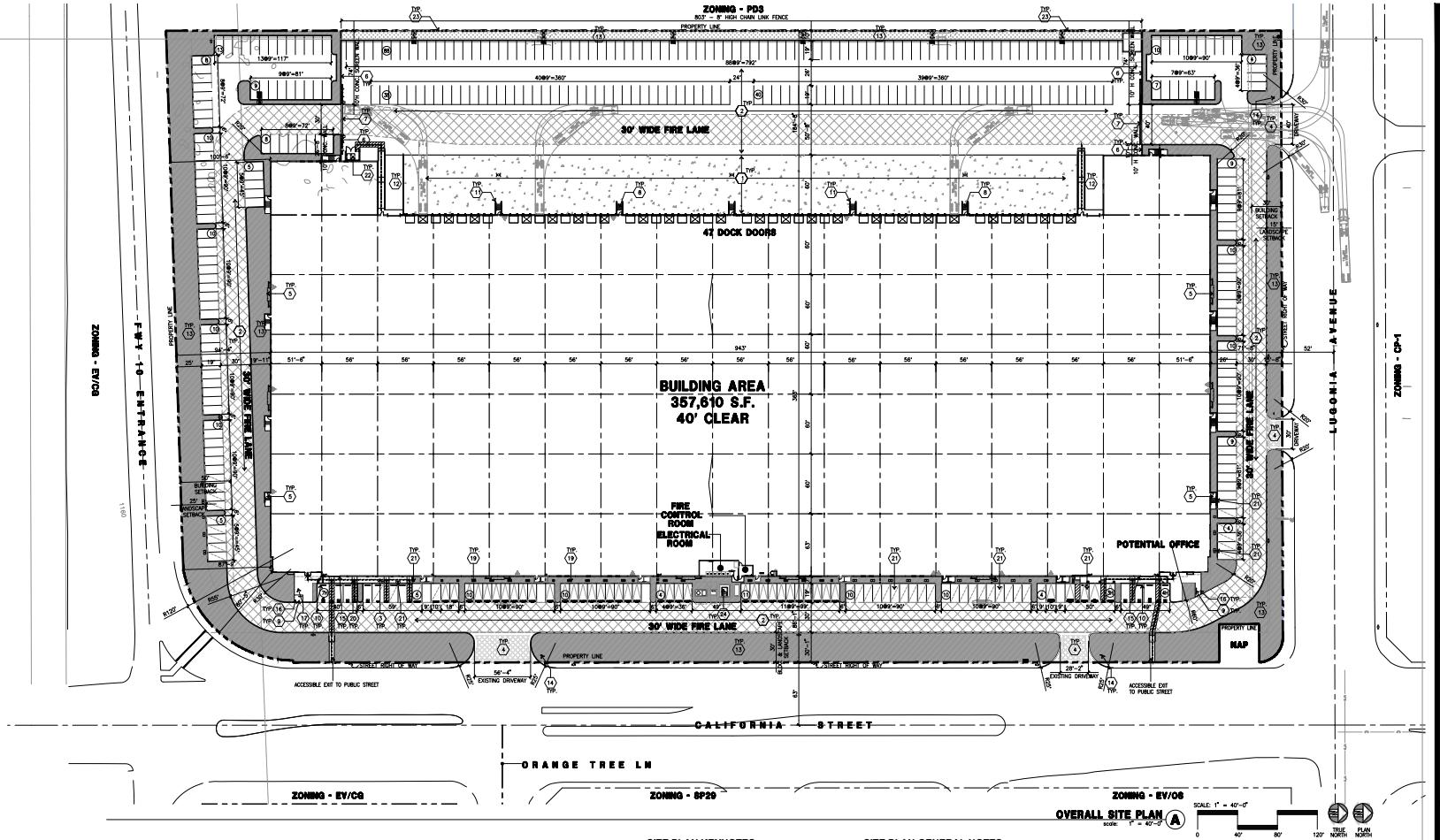
LILBURN CORPORATION

VICINITY MAP

1101CALIFORNIA STREET WAREHOUSE

City of Redlands, California

FIGURE 2



SITE PLAN KEYNOTES

1. HEAVY BROOM FINISH CONC. PAVEMENT.
2. PAVING PER CIVIL.
3. CONCRETE WALKWAY. SEE CIVIL PLAN.
4. DRIVEWAY APRONS.
5. 5'-6"X5'-6"X4" MIN. THICK CONCRETE EXTERIOR LANDING PAD TYP. AT ALL EXTERIOR MAN DOORS TO LANDSCAPED AREAS. FINISH TO BE MEDIUM BROOM FINISH. SLOPE TO BE 1/4" : 12" MAX. PROVIDE WALK TO PUBLIC WAY OR DRIVE WAY W/ 1:20 MAX. AS REQ. BY CITY INSPECTOR.
6. 10'H CONCRETE SCREEN WALL.
7. MANUAL OPERATED GATES W/ KNOX.
8. PAD LOCK PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY.
9. EXTERIOR CONC. STAIR.
10. BIKE RACK TYPICAL.
11. PRE-CAST CONC. WHEEL STOP.
12. CONC. FILLED GUARD POST "6 DIA. U.N.O. 42" H.
13. CONCRETE RAMP.
14. LANDSCAPE. LANDSCAPE AREAS INDICATED BY SHADED PATTERN.
15. ACCESSIBLE ENTRY SIGN.
16. ACCESSIBLE PARKING STALL SIGN.
17. DESIGNATED SMOKING AREA.
18. PATIO AREA
19. HOLLOW METAL DOOR MAN DOOR.
20. ELECTRONIC VEHICLE CHARGER SPACE WITH ELECTRIC VEHICLE SUPPLY EQUIPMENT (EVSE).
21. TRUNCATED DOME.
22. EV CAPABLE SPACE WITH CONDUIT ONLY.
23. TRASH ENCLOSURE.
24. 8'H CHAIN LINK FENCE.
25. APPROXIMATE LOCATION OF TRANSFORMER PAD.

SITE PLAN GENERAL NOTES

1. THE SOILS REPORT PREPARED BY NORCAL ENGINEERING DATED 05/02/2023 PROJECT NUMBER TBD SHOULD BE A PART OF THESE CONTRACT DOCUMENTS.
2. IF SOILS ARE EXPANSIVE IN NATURE, USE STEEL REINFORCING FOR ALL SITE CONCRETE.
3. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE WALL, FACE OF CONCRETE CURB OR GRID LINE U.N.O.
4. SEE "C" PLANS FOR ALL CONCRETE CURBS, GUTTERS AND SWALES.
5. THE ENTIRE PROJECT SHALL BE PERMANENTLY MAINTAINED WITH AN AUTOMATIC IRRIGATION SYSTEM, PRIOR TO INSTALLATION & AT LEAST 60 DAYS BEFORE BLDG. COMPLETION.
6. SEE "C" DRAWINGS FOR POINT OF CONNECTIONS TO OFF-SITE UTILITIES. CONTRACTOR SHALL VERIFY ACTUAL UTILITY CONTRACTOR SHALL VERIFY ACTUAL UTILITY LOCATIONS.
7. PROVIDE POSITIVE DRAINAGE AWAY FROM BLDG. SEE "C" DRAWINGS.
8. CONTRACTOR TO REFER TO "C" DRAWINGS FOR ALL HORIZONTAL CONTROL DIMENSIONS. SITE PLANS ARE FOR GUIDANCE AND STARTING LAYOUT POINTS.
9. SEE "C"DRAWINGS FOR FINISH GRADE ELEVATIONS.
10. CONCRETE SIDEWALKS TO BE A MINIMUM OF 4" THICK W/ TOOLED JOINTS AT 6' O.C. EXPANSION/CONSTRUCTION JOINTS SHALL BE A MAXIMUM 12' EA. WAY W/ 1:20 MAX. SLOPE. EXPANSION JOINTS TO HAVE COMPRESSIVE EXPANSION FILLER MATERIAL OF 1/4". SEE "L" DRAWINGS FOR FINISH.
11. ALL PARKING AREA SHALL PROVIDE A LANDSCAPED PLANTER OF A MINIMUM WIDTH OF SEVEN FEET WIDE AT THE ENDS OF ALL PARKING AISLES. ALL PLANTING AREAS SHALL HAVE ROUND CORNERS INSTEAD OF 90 DEGREE CORNERS AND BE SHAPED TO PERMIT VEHICLE TURN MOVEMENTS. TWO FEET OF CURB IS REQUIRED. SEE DETAIL "D"
12. PAINT CURBS AND PROVIDE SIGNS TO INFORM OF FIRE LANES AS REQUIRED BY FIRE DEPARTMENT.
13. CONSTRUCTION DOCUMENTS PERTAINING TO THE LANDSCAPE AND IRRIGATION OF THE ENTIRE PROJECT SITE SHALL BE SUBMITTED TO THE BUILDING DEPARTMENT AND APPROVED BY PUBLIC FACILITIES DEVELOPMENT PRIOR TO ISSUANCE OF BUILDING PERMITS.
14. PRIOR TO FINAL CITY INSPECTION, THE LANDSCAPE ARCHITECT SHALL SUBMIT A CERTIFICATE OF COMPLETION TO PUBLIC FACILITIES DEVELOPMENT.
15. NOT USED
16. ALL LANDSCAPE AND IRRIGATION DESIGNS SHALL MEET CURRENT CITY STANDARDS AS LISTED IN GUIDELINES OR AS OBTAINED FROM PUBLIC FACILITIES DEVELOPMENT.
17. NOT USED.
18. LANDSCAPED AREAS SHALL BE DELINEATED WITH A MINIMUM SIX INCHES (6") HIGH CURB
19. APPROVED CONCEPTUAL LANDSCAPE PLAN PRIOR TO GRADING PERMIT

SITE LEGEND

- STANDARD PARKING STALL, 9'X19'
- ACCESSIBLE PARKING STALL, 9'X19'+5' W/ ACCESSIBLE AISLE
- VAN ACCESSIBLE PARKING STALL, 12'X19'+5' W/ ACCESSIBLE AISLE
- STANDARD EVCS WITH EVCS SIGN ON POST, 9'X19'
- STANDARD ACCESSIBLE EVCS WITH EVCS SIGN ON POST AND MARKING "EV CHARGING ONLY", 9'X19'+5' W/ ACCESSIBLE AISLE
- VAN ACCESSIBLE EVCS WITH EVCS SIGN ON POST AND MARKING "EV CHARGING ONLY", 12'X19'+5' W/ ACCESSIBLE AISLE
- AMBULATORY EVCS WITH EVCS SIGN ON POST AND MARKING "EV CHARGING ONLY", 10'X19'
- EV CAPABLE SPACE WITHOUT EVSE SIZE 9'X19'
- LANDSCAPED AREA
- AC. PAVING – SEE "C" DRAWINGS. FOR THICKNESS
- LANDSCAPED AREA (WITHOUT TREES)
- CONCRETE PAVING SEE "C" DRWGS. FOR THICKNESS
- LANDSCAPE FINGER PER LOCAL JURISDICTION STANDARD
- PROPERTY LINE
- ACCESSIBILITY PATH OF TRAVEL 48" MIN WIDE, 5% MAX SLOPE, 2% MAX CROSS SLOPE
- 30' FIRE LANE, CLEAR TO SKY
- LIGHT STANDARD
- FIRE HYDRANT – APPROXIMATE LOCATION

CAUTION: IF THIS SHEET IS NOT 30"X42" IT IS A REDUCED PRINT

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Owner:

NORTH PALISADE PARTNERS

1330 FACTORY PLACE, STE 105
LOS ANGELES, CA 90013

Project:

1101 CALIFORNIA ST.

1101 CALIFORNIA ST.
CITY OF REDLANDS, CA

Consultants:

Civil:	hall+dallas
Structural:	-
Mechanical:	-
Plumbing:	-
Electrical:	-
Landscape:	emerald
Fire Protection:	-
Soils Engineer:	-

Title: OVERALL SITE PLAN

Project Number:	22446
Drawn by:	SLM
Date:	03/05/24

Revision:

Sheet: DAB-A1.1

SITE PLAN

1101CALIFORNIA STREET WAREHOUSE

City of Redlands, California

LILBURN CORPORATION

FIGURE 3

12. Evaluation Format:

This Initial Study is prepared in compliance with the California Environmental Quality Act (CEQA) Guidelines. This format of the study is presented as follows. The project is evaluated based upon its effect on eighteen (18) major categories of environmental factors. Each factor is reviewed by responding to a series of questions regarding the impact of the project on each element of the overall factor. The Initial Study Checklist provides a formatted analysis that provides a determination of the effect of the project on the factor and its elements. The effect of the project is categorized into one of the following four categories of possible determinations:

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

Substantiation is then provided to justify each determination. One of the four following conclusions is then provided as a summary of the analysis for each of the major environmental factors.

1. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
2. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.
3. Possible significant adverse impacts have been identified or anticipated and the following mitigation measures are required as a condition of project approval to reduce these impacts to a level below significant. The required mitigation measures are: (List mitigation measures).
4. Significant adverse impacts have been identified or anticipated. An Environmental Impact Report (EIR) is required to evaluate these impacts, which are: (List the impacts requiring analysis within the EIR).

At the end of the analysis the required mitigation measures are restated and categorized as being either self- monitoring or as requiring a Mitigation Monitoring and Reporting Program.

1.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

☐ Aesthetics	☐ Agriculture & Forestry Resources	☐ Air Quality
☒ Biological Resources	☒ Cultural Resources	☐ Energy
☒ Geology/Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology/Water Quality	☐ Land Use / Planning	☐ Mineral Resources
☐ Noise	☐ Population / Housing	☐ Public Services
☐ Recreation	☐ Transportation	☒ Tribal Cultural Resources
☐ Utilities / Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

1.3 ENVIRONMENTAL DETERMINATION

On the basis of this Initial Study, the City of Redlands Environmental Review Committee finds:

☐ 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 would have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the Proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect: 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the Proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Proposed Project, nothing further is required.

Kevin Beery — March 26, 2024
Signature — Date

Kevin Beery — _____
Printed Name — For

ENVIRONMENTAL CHECKLIST FORM

I. AESTHETICS – Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) 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 publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a) **Less Than Significant.** Scenic vistas in the General Plan Planning Area consist of the scenic corridors and views to and from the open spaces, canyonlands, hillsides, groves, and the San Bernardino Mountains.[1] The East Valley Corridor Specific Plan (EVCSP) concludes that the mountain background will be maintained and should be enhanced by landscaping and well-designed development. The Proposed Project would provide 82,104 SF of landscape. The Project Site was previously developed as a recreational water park until 2018; the tallest structures that existed on-site are estimated to have exceeded the maximum building height of the Proposed Project which would be 49 feet from grade. The Proposed Project would be redeveloped as a warehouse facility in compliance with development standards including building height restrictions, established in the General Plan and the EV/SD zoning district. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

b) **No Impact**. As previously stated, the Project Site is currently an abandoned developed lot which was utilized as an amusement park until 2018. The nearest State Scenic highway is I-210,[2] located approximately 1.5 miles east of the Project Site. The land between the Project Site and I-210 is completely developed. No rock outcroppings or historic buildings are located within the Project Site; resources are limited to the remaining ornamental trees which are not being cared for. Therefore, implementation of the Proposed Project would

[1] Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.
[2] San Bernardino County. Policy Plan web maps. NR-3 "Scenic Routes & Highways." Accessed December 8, 2023.

not substantially degrade scenic resources within a state scenic highway. No impacts are identified or anticipated, and no mitigation measures are required.

c) **No Impact.** The Proposed Project is redevelopment of the Project Site as a warehouse facility. The Proposed Project proposes 82,104 SF of landscaping. Therefore, the general aesthetics of the site would change from an abandoned and neglected prior use to a new industrial building with site landscaping. These changes would be considered beneficial. Moreover, the Project Site is located in a developed area that includes existing industrial and commercial uses. The Project Site is currently zoned EV/SD. The Proposed Project would be an allowable use within this zoning district. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

d) **Less than Significant**. The Proposed Project would not generate a significant amount of light and glare when compared to the surrounding area, which includes streetlights and security and other lighting associated with existing land uses. Currently, the Project Site consists of a developed lot which was utilized as a recreational water park until vacated in 2018. The Proposed Project would redevelop the Project Site as a warehouse facility. The design and placement of light fixtures within the future development would be reviewed for consistency with City standards and subject to City approval. City Standards require shielding, diffusing, or indirect lighting to avoid glare. Lighting would be selected and located to confine the area of illumination to be within the Project Site. Since lighting would be designed to prohibit spill-over onto adjacent residential development to the south, east and west, no significant impacts would result. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

II. AGRICULTURE AND FORESTRY RESOURCES

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

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the	☐	☐	☒	☐

California Resources Agency, to non-agricultural use?				
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 (g))?	☐	☐	☐	☒
d) Result in loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

a) **Less than Significant**. The Project Site is identified as "Urban and Built-Up Land."[3] Urban and Built-up Land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, and other developed purposes.[4] As no Prime or Unique Farmlands or Farmland of Statewide Importance are located within or adjacent to the Project Site, no conversion of such farmlands will occur. Impacts related to this issue would be less than significant and no mitigation is required.

b) **No Impact.** Williamson Act contracts restrict land development of contract lands.[4] These contracts typically limit land use to agriculture, recreation, and open space, unless otherwise stated in the contract. The Project Site is currently zoned Special Development (EV/SD). It is not zoned for agricultural use is not enrolled in a Williamson Act contract.[5] Implementation of the Proposed Project would not interfere with such a contract. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

c) **No Impact.** The Project Site has a land use designation of Commercial/Industrial and is currently zoned Special Development (EV/SD). The Proposed Project would not Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources

[3] California Department of Conservation. California Important Farmland Finder. Accessed December 8, 2023.
[4] California Department of Conservation. Important Farmland Categories. Accessed December 8, 2023.
[5] Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.2-1: Farmland Classifications.

Code section 12220(g), timberland. The Project Site does not contain forestland. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

d) **No impact.** The Project Site does not support, nor is it near any forest land. Therefore, implementation of the Proposed Project would not convert forest land to non-forest use. No impacts are identified or anticipated, and no mitigation measures are required.

e) **No Impact.** The Project Site does not support agricultural or forest land uses that would be lost as a result of the Proposed Project implementation. There are no such land uses in the vicinity. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

III. AIR QUALITY

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

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

a) **Less than Significant.** Urban Crossroads prepared an Air Quality Impact Analysis for the Proposed Project in October 2023 which is available for review on the City's website (https://www.cityofredlands.org/post/environmental-documents), and at the Development Services Department, 35 Cajon St Suite 20, Redlands, and is summarized herein. The Project Site is located in the South Coast Air Basin (SCAB). The South Coast Air Quality Management District (SCAQMD) has jurisdiction over air quality issues and regulations within the SCAB. The Air Quality Management Plan (AQMP) for the SCAB establishes a program of rules and regulations administered by the SCAQMD to obtain attainment of the state and federal ambient air quality standards. The most recent AQMP (AQMP 2016)

was adopted by the SCAQMD on March 3, 2017.[6] The 2016 AQMP identifies strategies and control measures needed to achieve attainment of the 8-hour ozone standard and federal annual and 24-hour standard for PM2.5 in the SCAB. Consistency with the AQMP is determined through evaluation of whether a project would exceed the estimated emissions used as the basis of the AQMP, which are based, in part, on population projections developed by the Southern California Association of Governments (SCAG). The SCAG forecasts are based on local general plans and other related documents, such as housing elements, that are used to develop population projections and traffic projections. Consistency with the AQMP for general development projects is determined by demonstrating compliance with local land use plans and/or employment projections. A project is non-conforming if it conflicts with or delays implementation of any applicable attainment or maintenance plan. A project is conforming if it complies with all applicable SCAQMD rules and regulations, complies with all proposed control measures that are not yet adopted from the applicable plan(s), and is consistent with the growth forecasts in the applicable plan(s) (or is directly included in the applicable plan).

The Proposed Project does not involve amendments to land use or zoning designations and therefore is accounted for in the AQMP. Additionally, because the site was previously developed with an amusement park, the Air Quality Impact Analysis utilized the past emissions values as the existing condition baseline for the Proposed Project's new development emissions.[7]

Construction of the Proposed Project would involve the use of off-road equipment, haul trucks, and worker commute trips. Assumptions for off-road equipment emissions in air quality plans are developed based on hours of activity and equipment population reported to CARB for rule compliance. The use of construction equipment in the AQMP is estimated for the region on an annual basis, and construction-related emissions are estimated as an aggregate in the AQMP. Since construction is limited to short-term activities and construction activities would not involve unusual characteristics that would necessitate the use of extensive off-road equipment usage, the Proposed Project would not increase the assumptions for off-road equipment use in the AQMP. Construction activities would also comply with the applicable SCAQMD rules and regulations, including Rule 401 (Visible Emissions), Rule 402 (Nuisance), Rule 403 (Fugitive Dust), and Rule 1113 (Architectural Coating), which are developed to implement AQMP control measures. In addition, the Proposed Project would result in emissions that would be below the SCAQMD regional and localized thresholds during construction, as concluded in responses III) b and III) c below. The thresholds were developed to assist the region in attaining applicable state and federal ambient air quality standards; therefore, the Proposed Project would not result in an increase in the frequency or severity of existing air quality violations and would not have the potential to cause or affect a violation of the ambient air quality standards. Therefore, construction activities would not conflict with the applicable air quality plan.

[6] City of Redlands. General Plan Update and Climate Action Plan. *Environmental Impact Report*. July 21, 2017. Accessed December 18, 2023.
[7] Urban Crossroads. Air Quality Impact Analysis and Greenhouse Gas Analysis. October 12, 2023.

The Proposed Project would not involve any uses that would increase population beyond that considered in the General Plan. The Proposed Project is consistent with the General Plan land use designation of Commercial/Industrial. As such, the Proposed Project's operational activities would not involve any uses that would increase population or vehicle trips beyond that considered in the General Plan, which was used to develop the assumptions in the 2016 AQMP. Therefore, the Proposed Project's operational emissions have been accounted for in the AQMP and would not exceed the current assumptions used to develop the AQMP. As shown below, the Proposed Project would generate operational emissions below the SCAQMD regional and localized thresholds. Therefore, the Proposed Project's operational emissions would not result in an increase in the frequency or severity of existing air quality violations and would not have the potential to cause or affect a violation of the ambient air quality standards.

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

b) **Less than Significant.** By its very nature, air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development within the SCAB, and this regional impact is cumulative rather than being attributable to any one source. A project's emissions may be individually limited, but cumulatively considerable when taken in combination with past, present, and future development projects. Projects that would not exceed the thresholds of significance would not contribute a cumulatively considerable amount of criteria air pollutant emissions to the region's emissions profile and would not impede attainment and maintenance of ambient air quality standards.

Construction

Emissions were estimated using the California Emissions Estimator Model (CalEEMod), version 2022. Construction emissions are considered short-term, temporary emissions but have the potential to result in a significant impact on air quality. Construction activities for the Proposed Project would generate temporary emissions of precursors to ozone (VOC and NOX), CO, SO_X, PM_{10}, and $PM_{2.5}$. Mobile equipment, such as off-road construction equipment and on-road motor vehicles, generate exhaust emissions of VOC and NOX, CO, SO_X, PM_{10}, and $PM_{2.5}$. Fugitive particulate matter dust emissions (PM_{10}, and $PM_{2.5}$) are also associated with site preparation/ grading activities as well as travel on unpaved and paved roads and vary as a function of parameters such as soil silt content, soil moisture, wind speed, acreage of disturbance area, and miles traveled by construction vehicles.

Construction is anticipated to occur between July 2024 through May 2025. The Air Quality Impact analysis also estimated the total number of construction-related vehicle trips to and from the Project Site (as described in Table 1). Using these assumptions, daily worker trips would range between 15 to 224 trips.

Table 1
Construction Trip Assumptions

Phase Name	Worker Trips Per Day	Vendor Trips Per Day	Total Hauling Trips
Demolition	15	5	35
Site Preparation	18	3	0
Grading	20	8	196
Building Construction	150	43	0
Paving	15	0	0
Architectural Coating	30	0	0

Source: Air Quality Impact Analysis

Additionally, as shown in Table 2, construction-related emissions would not exceed the SCAQMD maximum daily thresholds of significance for any criteria pollutants. Consistent with SCAQMD Rule 403, the analysis assumed the Proposed Project would implement typical best management practices (BMPs) during construction, such as appropriate dust-abatement measures (watering exposed areas at least twice per day and limiting vehicle speeds to 15 miles per hour on unpaved roads) to comply with SCAQMD Rule 401 (Visible Emissions), Rule 402 (Nuisance), and Rule 403 (Fugitive Dust).

Table 2
Construction-Related Maximum Daily Emissions

Year/Description	Emissions (lbs/day)					
	VOC	NO_x	CO	SO_x	PM_{10}[a]	$PM_{2.5}$[a]
Summer						
2024	3.92	51.63	41.50	0.15	8.37	4.22
2025	63.51	22.28	41.65	0.05	3.79	1.50
Winter						
2024	2.07	14.64	24.67	0.04	2.89	1.08
2025	63.45	22.43	37.91	0.05	3.79	1.50
Maximum Daily Emissions	**63.51**	**51.63**	**41.65**	**0.15**	**8.37**	**4.22**
SCAQMD Threshold (lbs/day)	75	100	550	150	150	55
Exceeds Threshold	**No**	**No**	**No**	**No**	**No**	**No**

Source CalEEMod 2022

Notes: [a]Emission estimates assume implementation of fugitive dust control requirements per SCAQMD Rule 403. VOC = volatile organic compounds; NO_x = nitrogen oxides; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = suspended particulate matter less than 10 micrometers in diameter; $PM_{2.5}$ = fine particulate matter less than 2.5 micrometers in diameter; lbs/day = pounds per day.

As shown in Table 2, both summer and winter season construction emissions are below SCAQMD thresholds. The Proposed Project does not exceed applicable SCAQMD regional thresholds during construction activities. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Operation

Mobile source emissions would be associated with vehicle trips to and from the site by future employees and contractors. Trip generation for the Proposed Project was based on information provided in the Traffic Analysis, dated December 14, 2023, provided by Urban Crossroads which is available for review on the City's website (https://www.cityofredlands.org/post/environmental-documents), and at the Development Services Department, 35 Cajon St Suite 20, Redlands, and is summarized herein. The Proposed Project would be anticipated to generate approximately 842 total daily trips, with 648 consisting of passenger vehicles and 194 of truck trips. Since mobile source emissions between passenger vehicles and trucks vary, and the trip distances between the two vehicle types will also differ, the Air Quality study analyzed these two sources of emissions to estimate the total impact of mobile source emissions. As shown in Table 3 and 4, project operational emissions would not exceed the SCAQMD regional thresholds of significance.

Table 3
Summer Operational Emissions Summary
(Pounds Max Per Day)

Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Mobile Source	3.05	19.40	43.55	0.22	12.33	3.39
Area Source	10.73	0.13	15.55	0.00	0.03	0.02
Total Maximum Daily Emissions	**13.78**	**19.54**	**59.10**	**0.22**	**12.36**	**3.41**
Existing Emissions	6.21	7.49	71.59	0.16	13.52	3.51
Net Emissions (Proposed – Existing)	**7.57**	**12.04**	**-12.48**	**0.06**	**-1.16**	**-0.10**
SCAQMD Regional Threshold (lbs/day)	55	55	550	150	150	55
Exceed Threshold	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod 2022

As shown in Table 3, the summer operational emissions are below SCAQMD thresholds. The Proposed Project would not exceed applicable SCAQMD regional thresholds during construction activities. The Proposed Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

Table 4
Winter Operational Emissions Summary
(Pounds Max Per Day)

Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Mobile Source	2.51	15.79	32.57	0.17	10.06	2.75
Area Source	9.93	0.09	10.65	0.00	0.02	0.01
Total Maximum Daily Emissions	**12.43**	**15.88**	**43.23**	**0.17**	**10.08**	**2.77**

Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Existing Emissions	5.76	8.08	58.27	0.15	13.52	3.51
Net Emissions (Proposed – Existing)	**6.68**	**7.79**	**-15.04**	**0.02**	**-3.45**	**-0.75**
SCAQMD Regional Threshold (lbs/day)	55	55	550	150	150	55
Exceed Threshold	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod 2022

As shown in Table 4, the winter operational emissions are below SCAQMD thresholds. The Proposed Project would not exceed applicable SCAQMD regional thresholds during operational activities. The Proposed Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

c) **Less than Significant.** Air pollution does not affect every individual in the population in the same way, and some groups are more sensitive to adverse health effects than others. Land uses such as residences, schools, day care centers, hospitals, and nursing and convalescent homes are considered to be the most sensitive to poor air quality because the population groups associated with these uses have increased susceptibility to respiratory distress or, as in the case of residential receptors, their exposure time is greater than that for other land uses. Therefore, these groups are referred to as sensitive receptors. SCAQMD defines sensitive receptors as children, adults, and seniors occupying or residing in residential dwellings, schools, day care centers, hospitals, and senior-care facilities. The Project Site is approximately 0.17 miles north of an existing residential development. Other sensitive receptors located near the Project Site would be Mission Elementary School approximately 0.3 miles south of the project.

Health Risk Assessment (HRA)

A Mobile Source Health Risk Assessment dated October 12, 2023, was prepared by Urban Crossroads for the Proposed Project which is available for review on the City's website (https://www.cityofredlands.org/post/environmental-documents), and at the Development Services Department, 35 Cajon St Suite 20, Redlands, and is summarized herein. This report evaluates the potential health risk impacts associated with the development of the Project to sensitive receptors in the area, including residents and adjacent workers. Health risks are those that may occur as a result of exposure to Toxic Air Contaminants (TACs) including diesel particulate matter (DPM) from heavy-duty diesel trucks accessing the site.

Construction

The existing nearby land use with the greatest potential exposure to Project construction-source DPM emissions is an existing residential development which is located approximately 0.17 miles south of the Project Site. At the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 0.30 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-

cancer risks were estimated to be <0.01, which would not exceed the applicable threshold of 1.0. The Proposed Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction activity. All other receptors during construction activity would experience less risk than what is identified for this location.

Operations

Residential Exposure Scenario:

As Previously mentioned, the land use with the greatest potential exposure to Project construction-source DPM emissions is an existing residential development which is located approximately 0.17 miles south of the Project Site. At the maximum exposed individual resident (MEIR), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 0.15 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. The Proposed Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project operational activity.

Worker Exposure Scenario:

The worker receptor land use with the greatest potential exposure to Proposed Project operational source DPM emissions is an adjacent industrial development, located approximately 105 feet west of the Project Site. At the MEIW, the maximum incremental cancer risk impact is 0.12 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. The adjacent industrial development is the worker receptor that would experience the highest concentrations of DPM during Proposed Project's operation due to meteorological conditions at the site. All other worker receptors in the vicinity of the project would be exposed to less emissions and therefore less risk than the MEIW identified herein. Therefore, the Project would not be anticipated to cause a significant human health or cancer risk to nearby workers.

School Child Exposure Scenario:

The nearest school is Mission Elementary School, located approximately 1,631 feet south of the Project Site. The maximally exposed individual school child (MEISC) is the school receptor that would experience the highest modeled concentrations of DPM, and thus the highest risk. At the MEISC, the maximum incremental cancer risk impact attributable to the Project is calculated to be 0.01 in one million, which is less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to the Project were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled school receptors would be exposed to lower concentrations of DPM, all other school receptors in the vicinity of the of the Project would be exposed to less emissions and therefore less risk than the MEISC identified herein. Therefore, the Proposed Project would not be anticipated to cause a significant human health or cancer risk to nearby school children.

Operation of the Proposed Project would not exceed the thresholds of significance. Therefore, the Proposed Project would not expose sensitive receptors to substantial pollutant concentrations and this impact would be less than significant.

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

d) **Less than Significant.** The occurrence and severity of other emissions, such as those leading to odor impacts, depend on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the presence of sensitive receptors. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress and often generating citizen complaints to local governments and regulatory agencies. Typical facilities that generate odors include wastewater treatment facilities, sanitary landfills, composting facilities, petroleum refineries, chemical manufacturing plants, agriculture, and food processing facilities (SCAQMD 2005). Construction activities associated with the Proposed Project could result in short-term odor emissions from exhaust associated with construction equipment. The Proposed Project would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. Project operations would not include any land uses identified by the SCAQMD as being associated with the generation of objectionable odors. The Project Site has been fully disturbed and developed, and has been vacant since 2018. The site is intended to be utilized as a warehouse, which is not a use that is prone to emit odors that would adversely affect a substantial number of people.

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

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a) Have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☒

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan?	☐	☐	☐	☒

a) **Less than Significant.** The Project Site has been subjected to a high level of disturbance as it is the former Splash Kingdom amusement park site (currently non-operational).

There are 19 species that are State or federally listed as rare, threatened, or endangered species that have been or were identified as potentially present within the General Plan Planning Area.[8] Only the following eight species are known to either be present or have a moderate to high probability of occurring: Nevin's barberry; Slender-horned spineflower; Santa Ana River woolly star; Southwestern willow flycatcher; California gnatcatcher; Least Bell's vireo; San Bernardino kangaroo rat; and Stephens' kangaroo rat.[9] These species are present or have a moderate to high probability of occurring within the General Plan Planning area due to the presence of suitable habitat, mainly along the Santa Ana River, Mill Creek, or San Timoteo Creek. The Project Site does not occur within or near these identified suitable habitats. The Project Site is not located in an area containing critical habitats for the Santa Ana Sucker, the Southern Willow Flycatcher, and the San Bernardino Kangaroo Rat.[10] The Arroyo toad may also be present in Redlands but has a low probability of occurring along San Timoteo Creek or other drainages in the area. The other 10 species that are listed as rare, threatened, or endangered, and that are reported from the general vicinity of Redlands are not expected to occur within the Planning Area. According to the San Bernardino County Valley/Mountain Region Biotic Resources

[8] Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017
[9] Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.
[10] Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.4-2: Critical Habitat and Principal Waters.

Overlay, the Project Site is within an area that can support suitable habitat for burrowing owl.[11]

Additionally, the ornamental vegetation that occurs on the Project Site and immediate surrounding area contains habitat suitable for nesting birds. As such, pre-construction surveys are warranted and recommended to reduce the potential impacts to nesting birds, should project construction occur during the bird nesting season. Therefore, possible significant adverse impacts have been identified or are anticipated and the following mitigation measure is required as a condition of project approval to reduce these impacts to a level below significant.

Mitigation Measure BIO-1:

Preconstruction Nesting Bird Survey - If construction or other Project activities are scheduled to occur during the nesting bird season (February 1 through August 31), a preconstruction nesting bird survey shall be conducted by a qualified avian biologist to ensure that active bird nests will not be disturbed or destroyed. The survey shall be completed no more than three days prior to initial ground disturbance. The nesting bird survey shall include the Project Site and adjacent areas where Project activities have the potential to affect active nests, either directly or indirectly, due to construction activity, noise, human activity, or ground disturbance. If an active nest is identified, a qualified avian biologist shall establish an appropriately sized non-disturbance buffer around the nest using flagging or staking. Construction activities shall not occur within any non-disturbance buffer zones until the nest is deemed inactive by the qualified avian biologist. If initial ground-disturbing activities are scheduled to occur during the nesting bird season, then a biological monitor shall be present during all vegetation removal activities to ensure no impacts to nesting birds occur.

The Project Site is surrounded by commercial development and industrial distribution centers to the north and west. Offices, commercial, medical, and institutional uses are located to the east. The I-10 and Metrolink route is directly south of the Project Site, with an agricultural orange grove and commercial gas station occurring beyond I-10.

The site currently contains remnants of the former amusement park's abandoned attractions and structures. The implementation of Mitigation Measure BIO-1 would ensure that potential impacts to candidate, sensitive or special status species are avoided by the project. Therefore, the Proposed Project would not involve habitat modifications or activities that would have adverse effects on biological resources.

b) **No Impact.** Riparian/Riverine areas are lands which contain habitat dominated by trees, shrubs, persistent emergent vegetation, or emergent mosses and lichens, which occur close to or which depend upon soil moisture from nearby freshwater sources, or areas with freshwater flow during all or a portion of the year. Most riparian areas are designated Open Space under the General Plan, and would thus be protected from direct impacts from

[11] http://www.sbcounty.gov/Uploads/lus/BioMaps/vly_mtn_all_biotic_resources_map_final.pdf

development.[12] The Project Site is currently designated Commercial/Industrial in the East Valley Corridor Specific Plan. As stated previously, the Project Site is highly disturbed. There is no riparian habitat or other sensitive natural community on-site. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

c) **No Impact.** The Project Site is completely disturbed from the prior use which was vacated in 2018 with various structures remaining. Additionally, the Project Site as well as the surrounding uses are within a Commercial/Industrial land use category, which would not include any wetland resources. Therefore, the Proposed Project would not have a substantial adverse effect on state or federally protected wetlands. No impacts are identified or anticipated, and no mitigation measures are required.

d) **Less than Significant.** Wildlife movement and the fragmentation of wildlife habitat are recognized as critical issues that must be considered in assessing impacts to wildlife. Habitat fragmentation is the division or breaking up of larger habitat areas into smaller areas that may or may not be capable of independently sustaining wildlife and plant populations. Habitat linkages provide connections between larger habitat areas that are separated by development. Wildlife corridors are similar to linkages but provide specific opportunities for animals to disperse or migrate between areas.

The San Bernardino County Land Use Plan Open Space Element depicts wildlife corridors within the Valley and Mountain Areas. According to the Land Use Plan, the Project Site has not been identified as occurring within a Wildlife Corridor.[13] The Project Site is located in a developed area mixed with industrial and commercial uses. It is surrounded by industrial and commercial uses to the north, east, and west, and the I-10 freeway, residential and commercial uses exist to the south of the Project Site. The Project Site and its immediate vicinity are not suitable for facilitating the movement of fish or wildlife. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

e) **Less than Significant.** The Project Site currently has remnant ornamental trees remaining from the prior water park. The Proposed Project has a landscape plan that would include approximately 82,104 sf of new irrigated landscaping along the northern, eastern, and southern property lines. Additionally, the Proposed Project would be required to abide by the City of Redlands Municipal Code Chapter 12.52, describing trees and tree protection along streets and in public places. Therefore, with the adherence to Municipal Code Chapter 12.52, no significant impacts would be identified or anticipated, and no mitigation measures are required.

f) **No Impact.** The City of Redlands General Plan and the California Department of Fish and Wildlife's California Natural Community Conservation Plans do not identify the Project Site, nor the vicinity to be within a Habitat Conservation Plan.[14] Additionally, the Proposed

[12] Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.
[13] San Bernardino County Land Use Plan. General Plan Open Space Element. Accessed December 20, 2023.
[14] California Department of Fish and Wildlife. California Natural Community Conservation Plans. August 2023. Accessed December 20, 2023.

Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan because at present, there are no adopted regional HCPs or natural community conservation plans within Redlands.[15] Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

a, b) **Less than Significant with Mitigation.** A Phase I Cultural Resources Survey and Paleontological Assessment dated October 18, 2023, was conducted by BFSA Environmental Services for the Proposed Project, and is available for review on the City's website (https://www.cityofredlands.org/post/environmental-documents), and at the Development Services Department, 35 Cajon St Suite 20, Redlands, and is summarized herein . The Project Site is situated within the broad, fault-bounded alluvial valley of the Santa Ana Wash between the San Bernardino Mountains to the north and the San Timoteo Badlands to the south. The project overlies middle Holocene young axial-valley deposits. These sedimentary deposits are characterized as fine – to coarse – grained sands and pebbly sands. An archaeological records search was conducted by BFSA at the SCCIC at CSU Fullerton.

The records search did not identify any recorded resources within the project. However, 62 resources (one prehistoric, one multicomponent, and 60 historic) were recorded within one mile of the project. The single prehistoric resource is an isolate, while the multicomponent resource is the Guachama Rancheria Site. The remaining 60 historic resources are primarily associated with the historic development of the region and are mostly comprised of built resources. The records search also indicated that a total of 43 cultural resources studies have been conducted within a one-mile radius of the project. However, none of the studies on file with the SCCIC were within the subject property.

[15] Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.

The Project Site currently consists of a developed lot, which has been vacated and cleared of buildings. The Proposed Project would result in redevelopment of the Project Site with a warehouse. Although the Project Site has previously been fully graded, the Proposed Project would involve new grading and other earthwork that could potentially unearth unknown historic and archeological resources. To ensure potential impacts to these resources are reduced to a less than significant level, the following mitigation measure shall be implemented:

Mitigation Measure CR-1:

In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.

c) **Less than Significant with Mitigation.** Construction activities, particularly grading, soil excavation and compaction, could adversely affect unknown buried human remains. The discovery of human remains is always a possibility during ground-disturbing activities. Therefore, possible significant adverse impacts have been identified or anticipated and Mitigation Measure CR-2 is required to reduce these impacts to a less than significant level.

Mitigation Measure CR-2:

If human remains are discovered, work shall halt in that area until a determination can be made regarding the provenance of the human remains, and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98), and the State Health and Safety Code (Sec. 7050.5) shall be undertaken. All work shall be directed away from the location of the discovery and any nearby area reasonably suspected of overlaying adjacent human remains until a determination can be made by the medical examiner. The medical examiner will determine if the remains are or are most likely to be of Native American origin. If human remains are determined to be Native American, the medical examiner will notify the NAHC within 24 hours. If human remains are not Native American, the medical examiner will determine the appropriate course of action with the city staff (Public Resources Code 5097.98).

Implementation of Mitigation Measures CR-1 and CR-2 would ensure that no significant impacts to historical and archaeological resources occur.

VI. ENERGY

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

a) **Less than Significant.**

Electricity

Southern California Edison (SCE) provides electricity to the area of the Project Site. Under the prior use as a water park, the Project Site received service from SCE; although demand for energy during peak operations has not been determined. The analysis for the Proposed Project therefore utilized CalEEMod defaults which incorporates the application of the 2005, 2008, 2013, 2016, and 2019 Title 24 standards to the building's design. The Air Quality Study prepared by Urban Crossroads identified that the estimated electricity consumption would be approximately 2,707,264 kilowatt hours (kWh) per year for the Proposed Project. The industry sector of the Southern California Edison planning area consumed approximately 17,353 GWh of electricity in 2022.[16] The increase in electricity demand from the project would result in approximately 2.71 GWh per year, which would represent a 0.02 percent of the overall 2022 SCE industry consumption. Therefore, projected electrical demand would not significantly impact SCE's level of service.

Based on information provided by the Project applicant, the site is not expected to utilize natural gas for any energy consumption. It should be noted that the Project would include solar photovoltaic with the capability to off-set 100 percent of building electricity demand. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

b) **Less than Significant.** The Proposed Project would be required to comply with the California Building Code (CBC) and California Green Building Standards Code (CALGreen Code) pertaining to energy and water conservation standards in effect at the time of construction. The Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and therefore no significant impacts are anticipated, and no mitigation measures are recommended Impacts would be less than significant and no mitigation is required.

[16]California Energy Commission. https://ecdms.energy.ca.gov/Default.aspx. Accessed December 21, 2023.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☒	☐	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 181-B of the California Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

a)

i. **Less Than Significant.** A Geotechnical Engineering Investigation, dated May 2, 2023, and reviewed February 1, 2024, was prepared for the Proposed Project by NorCal Engineering which is available for review on the City's website (https://www.cityofredlands.org/post/environmental-documents), and at the Development Services Department, 35 Cajon St Suite 20, Redlands, and is summarized herein. As stated in the geotechnical report, the proposed development lies outside of any Alquist Priolo Special Studies Zones and the potential for damage due to direct fault rupture is considered unlikely. The nearest active fault would be the San Jacinto (San Bernardino Valley Segment) Fault zone is located approximately 3.7 miles west of the Project Site.

No evidence of surface faulting was observed on the property during site reconnaissance. Furthermore, there are no active fault traces in the immediate vicinity of the Project Site. Accordingly, the Project Site is not within an Earthquake Fault Zone (Special Studies Zone) and will not require a special site investigation by an Engineering Geologist. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

ii. **Less Than Significant with Mitigation.** The site is located in a seismically active area of Southern California. As stated previously, the nearest active fault line is the San Jacinto fault zone located approximately 3.7 miles west of the Project Site. Ground shaking originating from earthquakes along other active faults in the region is expected to induce lower horizontal accelerations due to smaller anticipated earthquakes and/or greater distances to other faults. The Proposed Project would be required to adhere to existing building codes and state and local regulations to minimize any potential significant seismic impact to the Project Site. Additionally, the Proposed Project shall implement Mitigation Measure GEO-1 below to ensure that the hazards due to seismic ground shaking are addressed.

Mitigation MeasuresGEO-1:

The recommendations regarding site preparation and construction, as described in a Final Geotechnical Investigation as approved by the City Engineer, shall be incorporated into project design.

Therefore, with the implementation of GEO-1 the Proposed Project would be anticipated to pose a less than significant impact on future seismic related events.

iii. **Less Than Significant Impact.** Liquefaction is a phenomenon in which cohesion-less, saturated, fine-grained sand and silt soils lose shear strength and exhibit fluid-like flow

behaviors due to seismic-related ground failure. The main factors contributing to liquefaction potential are:

1. Cohesionless, granular soils having relatively low density (usually of Holocene age);
2. Shallow groundwater (generally less than 50 feet); and
3. Moderate to high seismic activity

Based on the geotechnical analysis, the site is expected to experience ground shaking and seismic activity, which is a factor that contributes to the potential of liquefaction. However, since the depth to groundwater is estimated to be greater than 100 feet in the vicinity of the site, the risk of liquefaction (sudden loss of shear strength in a saturated cohesionless soil) is considered negligible. Based on review of the City of Redlands 2035 General Plan, the Project Site does not lie within an area designated as a high, medium, or low liquefaction susceptibility.[17] Additionally, the San Bernardino County Land Use Plan identifies that the Project Site is not within zones of "Suspected Liquefaction Susceptibility."[18]

Furthermore, the design of the proposed construction would be required to adhere to the latest Building Code provisions for earthquake design which would provide mitigation for ground shaking hazards that are typical to Southern California. Therefore, the Proposed Project would be anticipated to have a less than significant impact on geologic hazards related to ground failure.

iv. **Less Than Significant Impact.** The Project Site exists on primarily flat land due to the prior development of a waterpark. Currently, the Project Site contains the remains of pool establishments which range from 2 to 7 feet below the existing ground surface. However, the Proposed Project would include cut and fill procedures to achieve finished grade elevations. Additionally, based on the San Bernardino Countywide Plan, the Project Site does not exist within an area at risk of liquefaction or landslides.[19] Lastly, the geotechnical analysis recommends that site inspections be performed by a qualified geologist during all grading and construction of the development to verify the findings and recommendations within the geotechnical report. Therefore, a less than significant impact would be anticipated, and no mitigation measures are required.

b) **Less than Significant.** Erosion is a process that causes geologic surfaces to be worn away overtime due to chemical or physical abrasive factors such as rain or wind. During the development of the Project Site, which would include disturbance of approximately 14.1 acres (of the approximately 16-acre site), project-related dust may be generated due to the operation of construction equipment on-site or due to high winds. Additionally, erosion of soils could occur due to a storm event. Development of the Proposed Project would disturb more than one acre of soil; therefore, the Proposed Project is subject to the requirements of the State Water Resources Control Board General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order

[17] City of Redlands 2035 General Plan. Chapter 7. Healthy Community, Figure 7-28.
[18] County of San Bernardino Land Use Plan. General Plan. Geologic Hazard Overlays. (FH31 C).
[19] San Bernardino Countywide Plan. HZ-2 Liquefaction and Landslides. October 2020. Accessed January 9, 2024.

2009-2009-DWQ). Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation. The Construction General Permit requires the development and implementation of a Storm Water Pollution and Prevention Plan (SWPPP). The SWPPP must list Best Management Practices (BMPs) to avoid and minimize soil erosion. Adherence to BMPs is anticipated to ensure that the Proposed Project does not result in substantial soil erosion or the loss of topsoil. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

c) **Less than Significant Impact.** As previously stated, the Project Site exists on primarily flat land due to the prior development and is surrounded by urbanized development. Based on the San Bernardino Countywide Plan, the Project Site does not exist within an area at risk of liquefaction or landslides.[20] Lateral Spreading is known as a pervasive type of seismic-induced ground failure that may occur on gentle slopes or near free-faces, such as river channels.[21] Because the Project Site is primarily flat, and is encompassed by urbanized uses, seismic induced lateral spreading is not likely to exist within the Project Site.

The geotechnical report identified that the soil shrinkage will be on the order of five to ten percent due to excavation and recompaction, based upon the assumption that the fill is compacted to 92 percent of the maximum dry density per ASTM standards. Subsidence within the Project Site is expected to be approximately 0.2 feet due to earthwork operations. Additionally, construction of all structures would be required to comply with the 2022 California Building Code. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

d) **No Impact.** Expansive soils are fine grained clay soils generally found in historical floodplains and lakes. Expansive soils are subject to swelling and shrinkage in relation to the amount of moisture present in the soil. As concluded in the geotechnical report, the upper onsite soils are very low in expansion potential. Additionally, the onsite soils may be considered non-expansive for design purposes and may be used as a source of Engineered Fill with respect to constructing the planned improvements. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

e) **No Impact.** The Proposed Project would connect to the City's existing sewer collection system which includes a sewer main along California Street. No septic tanks or alternative wastewater disposal are proposed. No impacts are identified or are anticipated, and no mitigation measures are required.

f) **Less Than Significant with Mitigation.** Paleontological resources, including fossils, have been found in the Redlands area, and there is potential for paleontological finds to occur in remaining, unexcavated open space areas within and adjacent to the City of Redlands.[22] These resources are found in geologic strata conducive to their preservation, typically

[20] San Bernardino Countywide Plan. HZ-2 Liquefaction and Landslides. October 2020. Accessed January 9, 2024.
[21] USGS. Assessing Lateral Spread Hazards in Areas Prone to Great and Long-Duration Earthquakes. 2015. Accessed January 9, 2024.
[22] Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.

sedimentary formations. Paleontological resources have been identified in San Timoteo Canyon area in the past.

The Project Site is located in a developed area mixed with industrial and commercial uses. It is surrounded by commercial development and industrial distribution centers to the north and west. Offices, commercial, medical, and institutional uses are located to the east. The I-10 and Metrolink route is directly south of the Project Site, with an orange grove and gas station occurring beyond I-10. The property has been previously developed, however, has been vacant since 2018. The Proposed Project would redevelop the Project Site as a warehouse facility.

Given the property's current condition and surrounding development, there is low potential for paleontological finds during project construction. However, in the event that paleontological resources are discovered, the following mitigation measure shall be implemented:

Mitigation Measure GEO-2:

Establish a procedure for the management of paleontological materials found on-site during project development, including the following provisions:

- If materials are found on-site during grading, it is required that work be halted until a qualified paleontologist evaluates the find to determine if it represents a significant paleontological resource.
- If the resource is determined to be significant, the paleontologist shall supervise removal of the material and determine the most appropriate archival storage of the material.
- Appropriate materials shall be prepared, catalogued, and archived at the applicant's expense and shall be retained within San Bernardino County if feasible.

Therefore, with the implementation of **Mitigation Measure GEO-2**, the Proposed Project would pose a less than significant impact on potentially significant geologic or paleontological resources.

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
b) Conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing the emissions of greenhouse gases.	☐	☐	☒	☐

a) **Less than Significant.** A Greenhouse Gas Analysis dated October 12, 2023, was prepared for the Proposed Project by Urban Crossroads which is available for review on the City's website (https://www.cityofredlands.org/post/environmental-documents), and at the Development Services Department, 35 Cajon St Suite 20, Redlands, and is summarized herein. Gases that absorb and re-emit infrared radiation in the atmosphere are called greenhouse gases (GHGs). GHGs are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of GHGs because it is short lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

The City of Redlands has adopted a Climate Action Plan (CAP). The CAP serves as a qualified GHG Reduction Strategy, which enables streamlined environmental review of future development projects, in accordance with CEQA pursuant to CEQA Guidelines Section 15183.5. The CAP's GHG emission targets and goals are based on meeting the goals in Executive Order B-30 15 and Senate Bill 32 and following the CAP guidelines established in CARB's 2017 Scoping Plan. The CAP includes emissions targets of 6.0 MT CO2e per capita per year for 2030 and 5.0 MT CO2e per capita per year for 2035. Redlands' emissions targets are met in both years 2030 and 2035, with forecast emissions of 4.8 MT CO2e in 2030 and 4.5 MT CO2e 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.

In addition, as described in the City of Redlands CEQA Assessment VMT Analysis Guidelines, the SCAQMD in its Interim CEQA GHG Significance Thresholds for Stationary Sources, Rules and Plans (SCAQMD 2008b) recommends a screening threshold of 3,000 MT CO2e per for residential and commercial projects, and 10,000 MT CO2e per year for industrial projects. The SCAQMD significance thresholds also recommend evaluating construction emissions by amortizing them over an expected project life of 30 years. These quantitative thresholds are also used by the City of Redlands to determine the significance of GHG emissions.

Heavy-duty off-road equipment, materials transport, and worker commutes during construction of the Project would result in exhaust related GHG emissions. As described previously, operation of the Project would also generate GHG emissions associated with site operations, including area, energy, mobile, stationary, water, waste, and fugitive

(potential SF6 leakage) sources. Table 5 shows the Project's amortized annual construction GHG emissions.

Table 5
Amortized Annual Construction Emissions

Year	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	Refrigerants	Total CO_2e[5]
2024	560.66	0.04	0.05	0.38	575.63
2025	263.30	0.01	0.01	0.21	267.45
Total GHG Emissions	823.96	0.05	0.06	0.59	843.08
Amortized Construction Emissions	**27.47**	**0.00**	**0.00**	**0.02**	**28.10**

Source: CalEEMod 2022

Based on Urban Crossroads CalEEMod (version 2022) results, construction activity for the project would generate an estimated 843.08 metric tons of CO_2e[5] per year. Therefore, the Proposed Project's construction emissions would not exceed the 10,000 MT CO2e annual screening threshold defined by SCAQMD.

The annual GHG emissions associated with the Project are summarized below in Table 6. It should be noted that the existing development emissions were subtracted from the Project operational emissions to determine the new emissions from the Proposed Project. As shown in Table 6, construction and operation of the Project would generate a net total of approximately 1,708 MTCO2e/yr.

Table 6
Project GHG Emissions

Emission Source	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	Refrigerants	Total CO_2e
Annual construction-related emissions amortized over 30 years	27.47	0.0	0.0	0.02	28.10
Mobile Source	3,072.72	0.20	0.34	4.31	3,183.19
Area Source	7.25	0.00	0.00	0.00	7.28
Water Usage	116.44	2.70	0.06	0.00	203.26
Waste	31.91	3.19	0.00	0.00	111.64
Refrigerants	0.00	0.00	0.00	1.11	1.11
Total CO2e (All Sources)	**3,534.58**				
Existing Emissions	2,228.88				
Net Emissions (Proposed – Existing)	**1,305.70**				

As such, the Project would not exceed the SCAQMD's recommended numeric threshold of 10,000 MTCO2e/yr. Therefore, project related emissions would not have a potential significant direct or indirect impact on GHG and climate change.

b) **Less than Significant.** The State of California and SCAQMD have adopted plans or policies to reduce GHG emissions. In September 2006, California passed the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32; California Health and

Safety Code Division 25.5, Sections 38500, et seq.). AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on statewide GHG emissions. It required that statewide GHG emissions be reduced to 1990 levels by 2020, which it met in 2016. In 2016, the state legislature also passed SB 32, which established a 2030 GHG emissions reduction target of 40 percent below 1990 levels. In 2008 and 2014, CARB approved the Scoping Plan and the first update to the Scoping Plan, respectively. In response to SB 32 and the companion legislation of AB 197, CARB approved the Final Proposed 2017 Scoping Plan Update: The Strategy for Achieving California's 2030 GHG Target in November 2017.

While the Scoping Plan updates do include measures that would indirectly address GHG emissions associated with construction and operational activities, including the phasing in of cleaner technology for diesel engine fleets (including construction equipment) and Low Carbon Fuel Standard, successful implementation of these measures predominantly depends on the development of laws and policies at the state level. As such, none of these statewide plans or policies constitutes a regulation to adopt or implement a regional or local plan for reduction or mitigation of GHG emissions. Thus, it is assumed that any requirements or policies formulated under the mandate of AB 32 and SB 32 that would be applicable to the project, either directly or indirectly, would be implemented consistent with statewide policies and laws.

The California Green Building Standards Code (CALGreen) encourages sustainable construction practices and building design as an effort to meet the goals of AB 32 to reduce statewide GHG emissions. The Proposed Project would comply with the latest CALGreen requirements. The CALGreen requirements include mandatory measures for all new building construction, which would result in energy conservation and make a major contribution in meeting the state's goals established by AB 32 and SB 32 for reduction in GHG emissions.

As stated previously, the City of Redlands adopted the City's CAP in December 2017, concurrent with the updated Redlands General Plan. The General Plan includes strategies such as transit-oriented and mixed-use development, integrated transportation and land use planning, promotion of bicycle and pedestrian movements, and parking and transportation demand management. It also includes goals and policies to promote energy efficiency, waste reduction, and resource conservation and recycling. These strategies, goals, and policies would result in GHG reduction compared to baseline trends. Specifically, the Proposed Project parking facilities would include Level 2 EV chargers for fleet and employees and Level 3 50kW fast chargers to support SCE's electric fleet, which would be consistent with CAP Measure Option G, Promote an Increase in the Amount of Zero-Emissions Vehicle Travel. The Proposed Project's paved areas would also include a bike rack and bike lockers, which would be consistent with CAP measures for bikeway system improvements and increased connectivity. In addition, since the Proposed Project would comply with the latest California Code of Regulations Title 24 building standards, which require that buildings are equipped with solar ready conduits for future photovoltaic panels as well as efficient building design, the Proposed Project would also be consistent with the following General Plan policies and actions:

- Policy 8-P.1: Promote energy efficiency and conservation technologies and practices that reduce the use and dependency of nonrenewable resources of energy;
- Action 8-A.9: Encourage the use of construction, roofing materials, and paving surfaces with solar reflectance and thermal emittance values per the California Green Building Code (Title 24, Part 11 of the California Code of Regulations) to minimize heat island effects;
- Action 8-A.25: Encourage water conservation through the following strategies:
    - Establish water and wastewater rates that encourage conservation and provide for system maintenance.
    - Update the landscape irrigation ordinance to continue reducing the use of potable water for landscape irrigation to CALGreen requirements. All aspects of landscaping from the selection of plants to soil preparation and the installation of irrigation systems should be designed to reduce water demand, retain runoff, decrease flooding, and recharge groundwater.
    - Establish incentives for use of water efficient fixtures and fittings.
- Action 8-A.39: Continue implementation and enforcement of the California Building and Energy codes to promote energy efficient building design and construction.

As stated in the City of Redlands CAP, the City's emissions targets are met in both years 2030 and 2035. Since the Proposed Project would be consistent with the General Plan land use designation and policies, and implementation of the General Plan would enable Redlands to meet the standards outlined in the 2017 Scoping Plan, the Proposed Project would neither conflict with the Scoping Plan, Scoping Plan updates, nor the City's CAP. Therefore, the Proposed Project would not conflict with plans, policies, or regulations for the purpose of reducing GHG emissions. No significant impacts are identified or anticipated, and no mitigation measures are required.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	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?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

a, b) **Less Than Significant.** The Applicant is proposing the development of a 357,610 SF warehouse facility. The storage of hazardous materials shall be kept in compliance with State and local regulations. Additionally, all materials required during construction would be kept in compliance with State and local regulations and would comply with Best Management Practices.

The California Health and Safety Code Chapter 6.95 includes provisions for Hazardous Materials Release Response Plans and Inventory. The intent of the code is to protect the public health and safety and the environment; it is necessary to establish business and area plans relating to the handling and release or threatened release of hazardous materials. In San Bernardino County, this program is referred to as the Hazardous Materials Release Response Plans and Inventory (Business Plan) program and is operated by the SBFD CUPA. The Business Plan program is intended to provide information regarding hazardous materials at facilities to emergency responders and the general public, along with coordinating the reporting of releases and spill response among businesses to local, State, and federal government authorities.

Facilities are required to disclose all hazardous materials and wastes above certain designated quantities which are used, stored, or handled at their facility, and to update their plans regularly. Facilities are also required to provide initial and annual training for employees to safely handle chemicals and to take appropriate emergency response actions. In San Bernardino County, the Business Emergency/Contingency Plan is also used to satisfy the contingency plan requirement for hazardous waste generators. Any business subject to any of the CUPA permits is required in San Bernardino County to file a Business Emergency/Contingency Plan using the California Environmental Reporting System (CERS). A new business going through the process of obtaining County or City planning or building approval is required to comply with the Business Emergency/Contingency Plan requirement prior to obtaining final certificate of occupancy and prior to bringing hazardous materials onto the property.

The warehouse facility would not create a significant hazard to the public or the environment due to the use of hazardous materials. The Project Site is currently zoned EV/SD. Uses allowed within this zone include manufacturing, research, warehousing/ distributing, assembly of non-hazardous products and materials, and retail related to manufacturing. Operational activities would also include standard maintenance (i.e., landscape upkeep, exterior painting and similar activities) involving the use of commercially available products (e.g., pesticides, herbicides, gas, oil, paint, etc.) the use of which would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accidental release of hazardous materials into the environment. The Proposed Project would require implementation of Best Management Practices (BMPs) and compliance with all applicable regulations. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

c) **No Impact.** The nearest school is to the Mission Elementary School, approximately 0.3-mile south of the Project Site. No schools exist within a quarter mile of the Project Site. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

d) **Less Than Significant.** The Project Site is not included on a list of hazardous material sites as compiled pursuant to Government Code Section 65962.5 and reported in the EnviroStor database.[23] Additionally, a Phase I ESA was completed May 9, 2023, and a Phase II ESA was completed for the Proposed Project on May 13, 2023, by Hazard Management Consulting, Inc. The Phase I ESA found that there was a potential for releases of chlorinated solvents and other VOC containing chemicals within the Project Site. Therefore, a Phase II ESA was conducted to analyze the sites soil and soil vapor composition to assess whether concentrations of chemicals of potential concern warrant further action. The study concluded that the soil investigation activities did not identify any residual sources of site-related chemical constituents. Therefore, no significant adverse impacts are identified or anticipated.

e) **Less Than Significant.** The nearest airport to the Project Site is the San Bernardino International Airport, which is located approximately 1.8 miles north of the Project Site.

[23] California Department of Conservation. EnviroStor Map Database. 2023. Accessed December 11, 2023.

However, the Proposed Project would not change air traffic patterns or create a safety hazard to people or aircraft. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

f) **Less than Significant.** The Project Site does not contain any emergency facilities.[24] It is adjacent to Lugonia Avenue, California Street, and the I-10 Freeway, the latter of which is classified as an evacuation route.[25] Additionally, during construction, the contractor would be required to maintain adequate emergency access for emergency vehicles as required by the City. The Proposed Project would provide more parking spaces than required, thereby keeping project vehicles off the public right of way.

The California Emergency Services Act requires the City to manage and coordinate the overall emergency and recovery activities within its jurisdictional boundaries. The City's Emergency Operations Plan includes policies and procedures to be administered by the City in the event of a disaster. During disasters, the City of Redlands is required to coordinate emergency operations with the County of San Bernardino. Policies within the City's General Plan and updates to the City's Emergency Plan, as required by State law, would ensure the Proposed Project would not interfere with adopted policies and procedures. Therefore, no significant impacts have been identified or anticipated, and no mitigation measures are required.

g) **Less than Significant.** The Project Site is located in an area with moderate threat to fire hazards.[26] It is located in an urban area and surrounded primarily by developed land. The Project Site is not located adjacent to or near wildlands. Therefore, the Proposed Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

[24] San Bernardino County. Countywide Policy Plan web maps: PP-1 "Critical Facilities." Accessed January 14, 2022.
[25] San Bernardino County. Countywide Policy Plan web maps: PP-2 "Evacuation Routes." Accessed January 14, 2022
[26] Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.7-3: Fire Hazards and Fire Safety Services.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede substantial groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
i) result in substantial erosion or siltation on- or off-site;				
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;				
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				
iv) impede or redirect flood flows?				
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or substantial groundwater management plan?	☐	☐	☒	☐

a) **Less than Significant Impact.** A Hydrology Study dated July 21, 2023, and a Preliminary Water Quality Management Plan dated July 20, 2023 and revised December 19, 2023, were prepared by Huitt-Zollars, Inc. Both reports are available for review on the City's website (https://www.cityofredlands.org/post/environmental-documents), and at the Development Services Department, 35 Cajon St Suite 20, Redlands, and is summarized herein. The Proposed Project would develop approximately 14.32 acres with impervious surfaces and would therefore be subject to National Pollutant Discharge Elimination System (NPDES) requirements. The State of California is authorized to administer various aspects of the NPDES. Construction activities covered under the State's General

Construction permit include the removal of vegetation, grading, excavating, or any other activity that causes the disturbance of one acre or more.

The General Construction permit requires recipients to reduce or eliminate non-storm water discharges into stormwater systems, and to develop and implement a SWPPP. The SWPPP is based on the principles of Best Management Practices (BMPs) to control and abate pollutants. Examples of BMPs include sandbag barriers, geotextiles, storm drain inlet protection, sediment traps, rip rap soil stabilizers, sweep roadway from track out, and rumble strips. BMPs applicable to the Proposed Project will be subject to City approval and provided in contract bid documents. The SWPPP must include BMPs to prevent project-related pollutants from impacting surface waters. The purpose of a SWPPP is to: 1) identify pollutant sources that may affect the quality of discharges of storm water associated with construction activities; and 2) identify, construct and implement storm water pollution control measures to reduce pollutants in storm water discharges from the construction site during and after construction.

The NPDES also requires a Water Quality Management Plan (WQMP), which is subject to review and approval by the City. A preliminary WQMP was prepared for the Proposed Project. The includes mandatory compliance of BMPs as well as compliance with NPDES Permit requirements. Review and approval of the WQMP by the City would ensure that all potential pollutants of concern are minimized or otherwise appropriately treated prior to being discharged from the Project Site. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

b) **Less Than Significant Impact.** The Project Site is located within the City of Redlands water service area. Redlands' water supply primarily comprises surface water from the Santa Ana River (SAR) and Mill Creek watershed and supplemented by groundwater extracted from the Bunker Hill Basin (part of the San Bernardino Basin) and Yucaipa Basin and a small amount of imported water when needed.[27] The Urban Water Management Plan (UWMP) for City of Redlands is based on projected growth included in General Plans for areas within their service area. The Proposed Project is consistent with the land use and population projections included in the General Plan. Therefore, the Proposed Project water demand is already anticipated from buildout of the General Plan Planning Area.

The new development is expected to have 14.32 acres of impervious land or approximately 89 percent of the total site acreage, and 1.72 acres of pervious land (approximately 11 percent). Implementation of the project Best Management Practices (BMPs) would ensure that stormwater discharge does not substantially alter the existing drainage pattern and water quality, thereby allowing runoff from the Project Site to be utilized as a resource that can eventually be used for groundwater recharge. Therefore, the Proposed Project is not anticipated to have a substantial impact on groundwater supplies or interfere substantially with groundwater recharge. No significant impacts are identified or anticipated, and no mitigation measures are required.

[27] Water Systems Consulting, Inc. and Woodard & Curran. 2020 Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan.

c)

i) **Less than Significant Impact**. Erosion is a phenomenon characterized by the wearing a way of a geologic surface as a result of forces such as wind or water. Siltation is another geologic term that describes how fine mineral particles such as silt or clay may be suspended in a body of water in various amounts depending on water velocity.

Soil erosion has the possibility to occur during a storm event. Construction activities covered under the State of California's General Construction permit include removal of vegetation, grading, excavating, or any other activities that causes the disturbance of one acre or more. The General Construction permit requires recipients to reduce or eliminate non-storm water discharges into stormwater systems, and to develop and implement a Storm Water Pollution Prevention Plan (SWPPP). The purpose of the SWPPP is to: 1) identify pollutant sources that may affect the quality of discharges of stormwater associated with construction activities; and 2) identify, construct, and implement stormwater pollution control measures to reduce pollutants in stormwater discharges from the construction site during and after construction. The SWPPP must list BMPs to avoid and minimize soil erosion. Adherence to BMPs would prevent substantial soil erosion or the loss of topsoil. Examples of BMPs include i.e., sandbag barriers, geotextiles, storm drain inlet protection, sediment traps, rip rap soil stabilizers, sweep roadway from track-out, and rumble strips. BMPs applicable to the Proposed Project will be subject to City approval and provided in contract bid documents. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

ii, iii) **Less than Significant Impact.** As described in the Hydrology Report, the site is currently developed and generally slopes ±1.0 percent from the southeast corner to the northwest corner of the property. The maximum site elevation, located at the southeast property corner, is approximately 1163± feet mean sea level (msl). The minimum site elevation located at the southwest property corner is 1151± feet msl. There are existing low points throughout the site due to the previously operational pools, but this is being disregarded for general site drainage purposes. Runoff from the existing site discharges into an existing storm drain lateral located at the northwest corner to the 66-inch storm drain in Lugonia Avenue. The Proposed Projects area runoff would be directed to the on-site underground infiltration system located on the west side of the site. The proposed 60" underground infiltration system would have a volume of 57,367 cubic feet (cf). Any potential overflow from the underground infiltration system would be discharged through storm drain Line C to the existing storm drain in Lugonia Avenue.

Site runoff from the east half of the warehouse building roof, east drive aisle, and east parking lot will be collected by catch basins 1-3. The collected runoff will then be conveyed through the proposed on-site storm drain Line A located along the Proposed Project's eastern parking lot and discharged to the underground infiltration system on the west side of the Project Site.

Site runoff from the west half of the building roof, west landscaping area, south landscaping and parking area, and the west truck docks will be collected by catch basins 4-6. The collected runoff will then be conveyed through the proposed on-site storm drain Line B located along the Proposed Project's western parking lot and discharged to the underground infiltration system on the west side of the Project Site.

iv) **Less than Significant Impact.** As previously stated, the underground infiltration system provides 57,367 cf of storage for water quality purposes. The proposed 100-year flood analysis generated from the Project Site is estimated to be 48.68 cubic feet per second (cfs). All proposed on-site drainage and storm drain facilities will be sized adequately for the 100-year storm event. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

d) **Less Than Significant Impact**. The National Flood Insurance Program (NFIP) identifies Special Flood Hazard Areas (SFHAs), or areas within the floodplain of a community subject to a 1-percent or greater chance of flooding in any given year, known as the 100-year flood. The Project Site is neither located within a 100-year floodplain nor a 500-year floodplain.[28] Due to the inland distance from the Pacific Ocean and any other significant body of water, tsunamis and seiches are not potential hazards at the site. Therefore, the risk of release of pollutants due to project inundation is low. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

e) **Less than Significant Impact.** Requirements of a NPDES permit to be issued for the Proposed Project would include development and implementation of a SWPPP and is subject to RWQCB review and approval. The Proposed Project would not otherwise substantially degrade water quality as appropriate measures relating to water quality protection would be implemented. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a) Physically divide an established community?	☐	☐	☒	☐
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

[28] San Bernardino Countywide Plan. HZ-4: Flood Hazards. October 2020. Accessed on January 10, 2024.

a) **Less Than Significant.** The physical division of an established community is typically associated with construction of a linear feature, such as a major highway or railroad tracks, or removal of a means of access, such as a local road or bridge, which would impair mobility in an existing community or between a community and an outlying area. The Proposed Project does not include the construction of a linear feature. Moreover, the Project Site currently consists of a previously developed and vacated lot. It is located in a Special Development zone (EV/SD) and is surrounded by commercial and industrial uses. Therefore, the Proposed Project would neither physically divide an established community nor cause a significant environmental impact due to conflict with any land use plans or policies. No impacts would occur, and no mitigation measures are required.

b) **Less Than Significant.** The Project Site is currently a developed lot and is located in the East Valley Corridor Specific Plan (EVCSP) – Special Development (EV/SD) District. The EV/SD District is intended to provide an alternative, more flexible site planning process of administrative professional, commercial, or industrial developments, or a mixture of such uses.[29] The Proposed Project would introduce a supply warehouse. The Project improvements would include a trash enclosure, updated driveway improvements on California Avenue and additional driveways on Lugonia Avenue, new site access gates with an eight (8) foot high concrete screen wall encompassing the western parking lot and docking area, eight (8) foot high security and maintenance fencing along the western boundary, approximately 82,104 SF of improved landscape areas. Paved areas would include employee parking, storage racks, bike racks, bike lockers, loading docks, and internal roadways, totaling approximately 280,174 SF. The Proposed Project would be an allowable use within the EV/SD zoning district. It would be subject to the development standards established by the EVCSP. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

[29] City of Redlands. Community Land Use: Chapter 11. Special Development District. Accessed December 11, 2023.

a, b) **No Impact.** The Project Site is not located within a Mineral Resource zone.[30] The previously developed Project Site is surrounded by industrial and commercial uses. The size of the Project Site and surrounding uses make the site unsuitable for mineral resources extraction. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

XIII. NOISE

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	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?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) 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 expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

a) **Less than Significant.**

The potential noise impacts of the Proposed Project were evaluated in light of applicable federal, state and local policies, including those of the City of Redlands.

The unit of measurement used to describe a noise level is the decibel (dB). The human ear is not equally sensitive to all frequencies within the sound spectrum. Therefore, the "A-weighted" noise scale, which weights the frequencies to which humans are sensitive, is used for measurements. Noise levels using A-weighted measurements are written dB(A) or dBA.

The noise descriptors utilized in the noise study for the Proposed Project include but are not limited to the following:

[30] Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.11-1: Mineral Resources.

- Ambient Noise Level: The composite of noise from all sources, near and far. In this context, the ambient noise level constitutes the normal or existing level of environmental noise at a given location.

- Community Noise Equivalent Level (CNEL): The average equivalent A-weighted sound level during a 24- hour day, obtained after addition of five (5) decibels to sound levels in the evening from 7:00 to 10:00 PM and after addition of ten (10) decibels to sound levels in the night before 7:00 AM and after 10:00 PM.

- Community Noise Equivalent Level (CNEL): The average equivalent A-weighted sound level during a 24- hour day, obtained after addition of five (5) decibels to sound levels in the evening from 7:00 to 10:00 PM and after addition of ten (10) decibels to sound levels in the night before 7:00 AM and after 10:00 PM

According to the City of Redlands General Plan, noise levels of up to 60 dBA CNEL are considered "clearly compatible"; and noise levels between 60 and 75 dBA CNEL are considered "normally incompatible" for single-family, multi-family, and mobile home residential uses.

Construction

Construction activities will occur in phases including grading, building construction, paving, and architectural coating. Assumptions for the phasing, duration, and required equipment for the construction of the Proposed Project were obtained from the project applicant.

The City's Municipal Code Sections 8.06.120 (G) and 8.06.090 limit the hours of construction to between the hours of 7:00 AM and 6:00 PM, including Saturdays, with no activities taking place at any time on Sundays or federal holidays. According to the EIR prepared for the City of Redlands General Plan (2017), a temporary increase in ambient noise levels from construction noise would be considered less than significant if construction activities comply with the City's Noise Control Ordinance in the Municipal Code, Section 8.06.090. Project construction will not occur outside of the hours outlined as "exempt" in City's Municipal Code Sections 8.06.120 (G) and 8.06.090; and therefore, would not result in 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.

In addition to adherence to the City of Redlands Municipal Code which limits the construction hours of operation, the following best management practices will be implemented to further reduce construction noise emanating from the Proposed Project:

Construction Noise - Best Management Practices

1. All construction equipment whether fixed or mobile, will be equipped with properly operating and maintained mufflers, consistent with manufacturer standards.

2. All stationary construction equipment will be placed so that emitted noise is directed away from the noise sensitive receptors nearest the project site.
3. As applicable, all equipment shall be shut off when not in use.
4. Equipment staging in areas shall be located to create the greatest distance between construction-related noise/vibration sources and existing sensitive receptors.
5. Jackhammers, pneumatic equipment, and all other portable stationary noise sources will be directed away and shielded from existing residences in the vicinity of the project site. Either one-inch plywood or sound blankets can be utilized for this purpose. They should reach up from the ground and block the line of sight between equipment and existing residences. The shielding should be without holes and cracks.
6. No amplified music and/or voice will be allowed on the project site.
7. Haul truck deliveries will not occur outside of the hours presented as exempt for construction per City's Municipal Code Sections 8.06.120 (G) and 8.06090.

Off-Site Construction Noise

In addition to on-site construction noise sources, delivery, concrete mixer, and haul trucks, as well as construction worker vehicles, would generate off-site noise. The primary noise sources associated with off-site construction traffic would be delivery trucks. Trucks traveling to and from the Project Site would be required to travel along a haul route approved by the City. There would be no noise-sensitive receptors along these routes. Therefore, off-site construction traffic generated by the Project along haul routes would not be considered significant. Further, any change in noise level would not be readily noticeable and would be less than significant. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

Operation

The Project Site is located on California Street adjacent to the I-10/California Street on-ramp. Local circulation would be provided by California Street to the east and Lugonia Avenue to the north. According to the General Plan EIR, California Street and Lugonia Avenue are classified as Major Arterial Roadways; these two roadways are currently used by 4-axle trucks with trailers accessing and leaving warehouses in the immediate vicinity of the Project Site. A Focused Traffic Study, dated December 14, 2023, was prepared for the Proposed Project by Urban Crossroads . As concluded in the study, all of the study area intersections are anticipated to operate at acceptable levels of service (per the City's thresholds) and, as such, there are no off-site improvements recommended because Project traffic is not anticipated to result in any deficiencies based on the City's thresholds and is therefore compliant with Measure U of the General Plan. As such, the Project applicant shall pay requisite fees towards future regional roadway improvements consistent with City requirements.

The Proposed Project design includes two 8-foot-tall concrete walls on either side of the western parking lot and loading dock area. The proposed walls would serve to mitigate any

potential significant project noise impacts during operations. Therefore, no significant impacts are anticipated during project operations.

The Proposed Project would not generate a substantial permanent increase in ambient noise levels in the vicinity of the Project Site.

b) **Less than Significant.** Construction activities can produce vibration that may be felt by adjacent uses. Although the primary sources of vibration during construction would be from bulldozers and vibratory rollers, other vibratory equipment could be used during installation of pavement. Construction of the Proposed Project would be temporary and would not present any long-term impacts. Construction activities would be short-term and would occur within the daytime hours permitted by the City per Sections 8.06.120 (G) and 8.06.090 of the Municipal Code.

Additionally, the City of Redlands has prohibited 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 150 feet from the source if on a public space or public right-of-way. The City of Redlands Municipal Code, Section 8.06.020, defines the vibration perception threshold as 0.01 inches per second over the range of one to one hundred (100) Hz.

The Project Site is adjacent to industrial and commercial uses to the north, east, and west, and the I-10 is directly south of the Project Site. Ground-borne vibration levels resulting from Proposed Project construction activities occurring at the Project Site would be temporary and construction activities, including grading, are anticipated to generate low levels of ground-borne vibration within the Project Site. Bulldozers, and other heavy-tracked construction equipment (expected to be used for this project) generate approximately 0.089 peak particle velocity (PPV) inches per second of ground-borne vibration when measured at 25 ft.

The closest existing off-site structure is an industrial warehouse development directly adjacent to the western property boundary of the Project Site. The nearest residential development is approximately 0.17 miles south of the Proposed Project, and beyond the I-10 freeway.

Construction equipment may result in temporary vibration levels that are noticeable if the equipment is within 100 feet of a receptor. However, since the nearest sensitive receptor is a residential development located approximately 800 feet south of the Project Site, no significant impacts are anticipated to occur. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

c) **Less Than Significant.** The Project Site is not within an airport safety review area or Airport Runaway Protection Zone. The Project Site is not located within the vicinity of a private or public airstrip. The Project Site is located approximately 1.8 miles south of the San Bernardino International Airport. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a) **Less Than Significant.** Construction of the Proposed Project would not be expected to attract a substantial number of new employees to the area since there is an existing pool of construction labor in Redlands and surrounding cities. In 2023, San Bernardino County was estimated to have 126,200 construction laborers.[31] Construction activities would be temporary and would not attract new employees to the area.

The Proposed Project would require approximately 312 employees, based on 1 employee per 1,195 SF of warehouse area and 1 employee per 697 SF of office area.[32] Employment in the City is anticipated to increase by approximately 15,521 jobs between 2016 and 2035.[33] The Proposed Project's employee requirement would represent approximately 2% of the City's projected employment growth between 2016 and 2035. In addition, the Proposed Project would be an allowable use within the EV/SD zoning district. Therefore, it would not induce substantial unplanned population growth within the City. Therefore, this would be considered a less than significant impact and therefore, no mitigation measures are required.

b) **No Impact.** The Project Site is currently a vacated water park with no structures, and does not contain any residential housing. Implementation of the Proposed Project would not require displacement of any existing housing units or the construction of replacement housing elsewhere. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

[31] California Department of Conservation. State of California: Employment Development Department. San Bernardino County Profile. Accessed December 13, 2023.
[32] SCAG Employment Density Study https://www.mwcog.org/file.aspx? 1 A=QTTlTR24POOOUIw5mPNzK8F4d8djdJe4LF9Exj6lXOU%3D
[33] Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.

XV. PUBLIC SERVICES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire Protection?	☐	☐	☒	☐
Police Protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other Public Facilities?	☐	☐	☒	☐

a)

Fire Protection

Less than Significant. Fire protection at the Project Site would be provided by the City of Redlands Fire Department (emergency operations, fire prevention services, and emergency medical services). The City of Redlands is served by four Redlands Fire Stations and responds as an all-risk fire and EMS agency. The Redlands Fire Department responded to 11,386 calls for service in 2021 and experiences a 6.65 percent increase on average annually. The Redlands Fire Department is staffed with 52 sworn personnel, of which 41 personnel are Paramedics and 16 are Emergency Medical Technicians. The Redlands Fire Department strives to meet the National Fire Protection Association (NFPA) standards, which recommend that the first arriving unit arrive within four minutes 90 percent of the time. A more lenient goal of arriving eight minutes and 30 seconds 90 percent of the time, per the June 25, 2020, Fire Department Assessment and Deployment Study for the Redlands Fire Department, is a more realistic objective given the analysis within the study.

Redlands Fire Department responds to multiple calls at one time (2 or more) 13.83 percent of the time. This is a significant percentage of calls that continues to rise based on the current fire and EMS defense system in the City. Currently, only 34 percent of the city is within an Effective Response Force (ERF) during congested periods. The Fire Department will be able to improve service levels with the planned addition of two new fire stations

and the relocation of a third. This will increase the four-minute service response time by 60 percent, providing an improvement in the ability of first responders to reach areas within the community that are currently outside of a four-minute response time window. The closest station to the Project Site is Redlands Fire Station 264, located at 1270 Park Avenue, approximately 1.5 miles southeast of the Project Site. Average travel time between Station 264 and the Project Site is approximately six minutes.

The Proposed Project would be designed, constructed, and operated according to applicable fire prevention/protection standards established by the City of Redlands. The Redlands Fire Department provides fire protection and prevention services to the City of Redlands.[34] The Proposed Project is required to provide a minimum of fire safety and support fire suppression activities, fire sprinklers, and paved fire access. The Redlands Fire Department and the Building Division enforce fire safety standards during review of building plans and inspections. Development impact fees (DIF) are collected at the time of building permit issuance and would increase funding to assist in the provision of planned facilities, equipment, and staffing. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Police Protection

Less than Significant. The City of Redlands Police Department (RPD) provides police protection for the Project Site and vicinity. The service ratio for the City is 1.1 officers per 1,000 residents. Though the City does not have a service ratio standard, the City recognizes that its ratio falls below the national average of 2.1, and that hiring additional officers would be optimal.[35] In 2015, the Department had an average response time of 6.5 minutes for police services.[36] Although there are no industry standards for response time to emergency calls, according to the City of Redlands, a response time of 4.5 minutes is desirable in a city of Redlands' size. Development of the Proposed Project may incrementally increase the demand for police protection services due to the increased population on the site. In its review of new development plans, the RPD evaluates project plans on its ability to provide proper police protection to the development. Additionally, the proponent of the Proposed Project would be required to pay service fees and DIF to the RPD. The DIF would be used to fund capital costs associated with acquiring land for new police stations, constructing new police stations, purchasing crime-fighting equipment for new police stations, and providing for additional staff as needed and as identified by the City. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Schools

Less than Significant. The Redlands Unified School District (RUSD) provides public schools in the Planning Area, which includes the Project Site. Construction and operation

[34] Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.
[35] Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.
[36] Dyett and Bhatia. City of Redlands 2035 General Plan Update DEIR. Police Safety Services. Accessed December 13, 2023.

of new school facilities would be funded through school impact fees assessed on new developments that occur within the school district. The Proposed Project is not anticipated to substantially increase population growth within the area, as the future employees would likely come from the local area (see XIV a) above), and therefore would not generate new students. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Parks

Less than Significant. The Redlands Parks Division currently operates 18 parks.[37] In 2035, with the development of 140.9 acres of proposed parkland as designated in the General Plan, and the addition of 10,355 residents, the ratio will be 6.9 acres per 1,000 residents, which would exceed the City's park standard of 5 acres per 1,000 people.[38] The Redlands Municipal Code provides for open space and park fees (i.e. DIF) to be imposed as a condition of approval of new residential, commercial, and office and industrial development (Chapter 3.32). The DIF are intended to ensure that open space lands and active and passive parks are made available to the public concurrent with the need for such lands and parks caused by new development. They may be used to pay for costs incurred by the City for acquiring, developing, improving, and expanding open space areas, scenic drives, parks, playgrounds, and recreational facilities to meet the increased needs for those facilities resulting from the effects of new development. Collection of the DIF would ensure no significant impacts to parks would occur. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Other Public Facilities

Less than Significant. DIF are charged by local governments to defray all or a portion of the cost of public facilities related to development projects. The requirements for enactment of a development impact fee program are set forth in Government Code Sections 66000-66025 (the "Mitigation Fee Act"). In Redlands, development impact fees are collected at the time a building permit is issued for the purpose of mitigating the impacts caused by new development on the City's infrastructure. Fees are used to finance the acquisition, construction, and improvement of public facilities needed as a result of a new development. A separate funding structure has been established to account for the impact of new development on each of the following types of public facilities: Open Space, Parks, Public Facilities (including public safety, library and general government facilities), Transportation, Water, Solid Waste, and Sewer. Collection of developer impact fees would ensure no significant impacts to other public utilities would occur. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

[37] City of Redlands. City-Owned and Operated Parks. https://www.cityofredlands.org/parks
[38] Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.

XVI. RECREATION

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	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?	☐	☐	☒	☐
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?	☐	☐	☐	☒

a) **Less than Significant.** The Redlands Parks Division currently operates 18 parks. Implementation of the Proposed Project would not induce residential development and would not significantly increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of any facilities would result. The Redlands Municipal Code provides for open space and park fees to be imposed as a condition of approval of new residential, commercial, and office and industrial development (Chapter 3.32). The fees are intended to ensure that open space lands and active and passive parks are made available to the public concurrent with the need for such lands and parks caused by new development. They may be used to pay for costs incurred by the City for acquiring, developing, improving, and expanding open space areas, scenic drives, parks, playgrounds, and recreational facilities to meet the increased needs for those facilities resulting from the effects of new development. Collection of fees would ensure no significant impacts to parks would occur. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

b) **No impact.** The Proposed Project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian facilities?	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

a) **Less Than Significant.** A Traffic Analysis dated December 14, 2023, was prepared by Urban Crossroads for the Proposed Project. Regional access to the Project Site is provided by the I-10 freeway at the California Street interchange which is adjacent to the project site. Local circulation would be provided by California Street to the east and Lugonia Avenue to the north. California Street and Lugonia Avenue are classified as Major Arterial Roadways.[39] Major arterial roadways typically provide four to six travel lanes and may also be used as truck routes. They usually provide service for the highest volumes and the longest trips and are reasonably higher-speed routes. They may provide service to abutting land, but access is secondary to through-travel needs. Minor arterial roadways enhance the major arterial network and are typically two to four travel lanes. They provide service to trips of moderate lengths.

Transit System:
The City is currently served by Omnitrans, a public transit agency serving the County of San Bernardino and the City of Redlands. However, there is currently no bus service along the Project Site roadways. The closest existing transit line is Route 8, which operates along Redlands Boulevard south of the I-10 Freeway and currently has stops near the corner of California Street and Redlands Boulevard. Transit service is reviewed and updated by Omnitrans periodically to address ridership, budget, and community demand needs. Changes in land use can affect these periodic adjustments which may lead to either enhanced or reduced service where appropriate.

Bicycle, Equestrian, and Pedestrian Facilities:
The Proposed Project will maintain the existing sidewalks along its frontage on both Lugonia Avenue and California Street. There are no existing bike routes along the study area roadways however, there are proposed bike routes along both Lugonia Avenue and California Street. The closest existing multi- use trail is located to the south of the I-10 Freeway, along Orange Blossom Trail.

The Connected City theme of the City General Plan promotes an efficient and integrated circulation system by enhancing the vehicular, biking, walking, and transit networks. The

[39] Dyett and Bhatia. City of Redlands General Plan 2035 EIR. Accessed December 22, 2023.

following analysis details project consistency with the applicable Connected City proposed actions:

5-A.14: Close the gaps in the sidewalk network where streets are built out but sidewalks are not complete.
Consistency: The Proposed Project would have continuous sidewalk pavement along the northern and eastern boundaries.

5-A.15: Maintain access for emergency vehicles and services by providing two means of ingress/egress into new communities, limitations on the length of cul-de-sacs, proper roadway widths and road grades, adequate turning radius, and other requirements per the California Fire Code.
Consistency: Access to the Project will be provided via two (2) existing driveways and two (2) new project driveways. The existing driveways along California Street on the eastern boundary of the site include one (1) 28' – 2" driveway to the north and one (1) 56" – 4" driveway to the south. The proposed driveways to the north of the Project along Lugonia Avenue would include one (1) 30' driveway to the east and one (1) 40' driveway to the west.

5-A.24: Use the City's Bicycle Master Plan as the primary resource for planning and implementing bikeway improvements.
5-A.26: Implement bicycle and trail improvements that provide strong north-south connections, especially with major east west trails, including routes on Mountain View Avenue, California Street, Nevada Street, Alabama Street, Texas Street, New York Street, Orange Street, Church Street, Dearborn Street, and Wabash Avenue.
Consistency: The portions of California Street and Lugonia Avenue adjacent to the Project Site are proposed future bike routes.[40] The Proposed Project would be required to provide right-of-way easements, which would allow for future bicycle and trail improvements along these streets.
5-A.28: Seek assistance from major employers in providing support facilities to encourage use of bikes for commuter purposes.
5-A.29: Incorporate end-of-trip facilities into Transportation Demand Management (TDM) plans at employment sites and public facilities, depending upon distance from bikeways. Provide well-located, secure bike storage facilities at employment sites, shopping and recreational areas, and schools in order to facilitate bike use. Encourage major employers to provide shower and changing facilities or assist in funding bicycle transit centers in nearby locations.
Consistency: The Proposed Project would provide 9 short-term bicycle racks and 9 long-term bicycle storage units.

5.A.47: Maximize the carrying capacity of arterials and boulevards by controlling the number of driveways and intersections, limiting residential access where applicable, and requiring sufficient on-site parking to meet the needs of proposed projects.

[40] Dyett and Bhatia. City of Redlands General Plan 2035. Adopted December 5, 2017. Figure 5-3: "Bicycle Facilities."

Consistent: Access to the Proposed Project would be provided by four gated driveways along California Street and Lugonia Avenue. California Street and Lugonia Avenue are major arterials. The City Code requires that the Proposed Project provide a total of 396 parking stalls, including 24 parking spaces for the office component of the Project and 372 parking spaces for the warehouse component of the Project. The Project Applicant would provide 396 stalls.

5-A.85: Discourage truck traffic from parking, idling, or traveling through local streets in residential neighborhoods.
Consistent: Project trucks would be utilizing a driveway along Lugonia Avenue. California Street and Lugonia Avenue are designated truck routes.[41] As shown in the City of Redlands General Plan Figure 5-7: Truck Routes, project trucks would not be traveling through residential neighborhoods and would use designated truck routes.

As summarized above, the Proposed Project would not conflict with the Connected City theme of the City General Plan. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

b) **Less than Significant**. Senate Bill (SB) 743 was adopted in 2013 requiring the Governor's Office of Planning and Research (OPR) to identify new metrics for identifying and mitigating transportation impacts within the California Environmental Quality Act (CEQA). For land use projects, OPR has identified VMT as the new metric for transportation analysis under CEQA. The regulatory changes to the CEQA guidelines that implement SB 743 were approved on December 28th, 2018, with an implementation date of July 1st, 2020, as the new metric. The City of Redlands City Counsel adopted their VMT Guidelines in July 21, 2020.

A Vehicle Miles Traveled (VMT) Screening Evaluation dated July 28, 2023, was conducted by Urban Crossroads for the Proposed Project. Based on the VMT Analysis, the Project Site is not located within a half mile of an existing major transit stop or along a high-quality transit corridor. In addition, the Project does not meet the secondary criteria of having a floor area ratio (FAR) at or above 0.75.
City Guidelines identifies VMT per service population as the appropriate VMT metric for industrial projects and an impact threshold of "15 percent less than the baseline level for the County." The San Bernardino Transportation Analysis Model (SBTAM) has been utilized to determine the existing VMT per service population generated by the TAZ in which the Project is located (TAZ 53824601). TAZ 53824601 was found to generate 16.1 VMT per service population, as compared to 15 percent less than the baseline level for the County or 28.4. Therefore, the Project was identified to be located in a low VMT generating TAZ.

City Guidelines states projects that are consistent with the current Sustainable Communities Strategy (SCS) or general plan, and that generate less than 3,000 metric tons of CO2e per year can be presumed to have a less than significant impact on VMT. Based on substantial evidence provided in the City Guidelines, Warehousing of less than 463,000 square feet is presumed to have a less than significant impact on VMT. The

[41] Dyett and Bhatia. City of Redlands General Plan 2035. Adopted December 5, 2017. Figure 5-7: "Truck Routes."

proposed Project consists of a 357,610 square foot warehouse building and therefore is below the threshold identified in the City Guidelines. In addition, the Project is located in an area designated for Commercial/Industrial uses and thus is consistent with the City of Redlands General Plan underlying land use assumptions.

The Project was evaluated and is consistent with City Guidelines and was found to meet the Low VMT Area Screening and the Project Type Screening. Therefore, the Proposed Project would have a less than significant impact and no further VMT analysis is required.

c) **Less than Significant Impact.** Access to the Project Site will be provided via 4 new and existing project driveways:

- Lugonia Avenue & Project Driveway #1 – This driveway will be a new intersection along the south side of Lugonia Avenue approximately 620 feet west of California Street. The driveway would serve passenger cars and trucks and would accommodate full access (e.g., no turn restrictions).
- Lugonia Avenue & Project Driveway #2 – This driveway will be a new intersection along the south side of Lugonia Avenue approximately 270 feet west of California Street. The driveway would serve passenger cars only and would be restricted to right-in/right-out access only.
- California Street & Project Driveway #3 – This existing driveway is not anticipated to be modified from the current location on California Street and would serve passenger cars only. The driveway would be restricted to right-in/right-out access only.
- California Street & Project Driveway #4 – This existing driveway is not anticipated to be modified from the current location on California Street and would serve passenger cars only. The driveway aligns with the existing Orange Tree Lane on the east and would accommodate full access with the existing traffic signal.

The Proposed Project is the development of a warehouse building which would be consistent with surrounding land uses and also adhere to the City's guidelines and Development Code. Furthermore, the Proposed Project would not include geometric designs or incompatible uses that would substantially increase hazards to the surrounding area. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

d) **Less than Significant Impact.** The nearest evacuation route to the Project Site would be the I-10 Freeway located directly south of the project boundary. As previously stated, the Project Site would have a total of four driveways, two located on Lugonia Avenue and two along California Street. During construction, the contractor would be required to maintain adequate emergency access for emergency vehicles. Project operations would not interfere with an adopted emergency response or evacuation plan. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

XVIII. TRIBAL CULTURAL RESOURCES

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

a)

i) **Less Than Significant with Mitigation.** A Phase I Cultural Resources Survey and Paleontological Assessment dated October 18, 2023, was conducted by BFSA Environmental Services for the Proposed Project. The records search did not identify any recorded resources within the project. However, 62 resources (one prehistoric, one multicomponent, and 60 historic) were recorded within one mile of the project. The records search also indicated that a total of 43 cultural resources studies have been conducted within a one-mile radius of the project. However, none of the studies on file with the SCCIC were within the subject property.

Although the Project Site has been fully graded, the Proposed Project would involve grading and other earthwork that could potentially unearth unknown historic and archeological resources. To ensure potential impacts to these resources is reduced to a less than significant level, the Mitigation Measures CR-1 and CR-2 shall be implemented.

Therefore, with the implementation of CR-1 and CR-2, the Proposed Project would not have a significant impact on potential historical resources.

ii) **Less Than Significant with Mitigation.** California Assembly Bill 52 (AB52) was approved by Governor Brown on September 25, 2014. AB52 specifies that CEQA projects

with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource may have a significant effect on the environment. As such, the bill requires lead agency consultation with California Native American tribes traditionally and culturally affiliated with the geographic area of a proposed project, if the tribe requested to the lead agency, in writing, to be informed of proposed projects in that geographic area. The legislation further requires that the tribe-requested consultation be completed prior to determining whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. On December 13, 2023, the San Manuel Band of Mission Indians responded that due to the project being located on existing Serrano territory it is therefore of interest to the Tribe. Additionally, on December 26, 2023, the Morongo Band of Mission Indians responded and requested further tribal participation (a.k.a. Tribal Monitors) is requested by MBMI THPO during all ground disturbing activities and additional mitigation measures stated below.

The Morongo Band of Mission Indians and the San Manuel Band of Mission Indians recommended the following Mitigation Measures which will be implemented for the Proposed Project to reduce any potentially significant impacts:

Mitigation Measure TR-1:

Tribal Monitoring Services Agreement Prior to the issuance of grading permits, the applicant shall enter into a Tribal Monitoring Services Agreement with the Morongo Band of Mission Indians (MBMI) for the Project. The Tribal Monitor shall be on-site during all ground-disturbing activities (including, but not limited to, clearing, grubbing, tree and bush removal, grading, trenching, fence post placement and removal, construction excavation, excavation for all utility and irrigation lines, and landscaping phases of any kind). The Tribal Monitor shall have the authority to temporarily divert, redirect, or halt the ground-disturbing activities to allow identification, evaluation, and potential recovery of cultural resources.

Mitigation Measure TR-2:

Retention of Archaeologist Prior to any ground-disturbing activities (including, but not limited to, clearing, grubbing, tree and bush removal, grading, trenching, fence post replacement and removal, construction excavation, excavation for all utility and irrigation lines, and landscaping phases of any kind), and prior to the issuance of grading permits, the Applicant shall retain a Qualified Archaeologist who meets the U.S. Secretary of the Interior Standards (SOI). The Archaeologist shall be present during all ground- disturbing activities to identify any known or suspected archaeological and/or cultural resources. The Archaeologist will conduct Cultural Resource Sensitivity Training, in conjunction with the Tribe[s] Tribal Historic Preservation Officer (THPO), and/or designated Tribal Representative. The training session will focus on the archaeological and tribal cultural resources that may be encountered during ground-disturbing activities as well as the procedures to be followed in such an event.

Mitigation Measure TR-3:

Cultural Resource Management Plan Prior to any ground-disturbing activities the project Archaeologist shall develop a Cultural Resource Management Plan (CRMP) and/or Archaeological Monitoring and Treatment Plan (AMTP) to address the details, timing, and responsibilities of all archaeological and cultural resource activities that occur on the project site. This Plan shall be written in consultation with the consulting Tribe[s] and shall include the following: approved Mitigation Measures (MM)/Conditions of Approval (COA), contact information for all pertinent parties, parties' responsibilities, procedures for each MM or COA, and an overview of the project schedule.

Mitigation Measure TR-4:

Pre-Grade Meeting The retained Qualified archeologist and Consulting Tribe[s] representative shall attend the pre-grade meeting with the grading contractors to explain and coordinate the requirements of the monitoring plan.

Mitigation Measure TR-5:

On-site Monitoring During all ground-disturbing activities the Qualified Archaeologist and the Tribal Monitor shall be on-site full-time. The frequency of inspections shall depend on the rate of excavation, the materials excavated, and any discoveries of Tribal Cultural Resources as defined in California Public Resources Code Section 21074. Archaeological and Tribal Monitoring will be discontinued when the depth of grading and the soil conditions no longer retain the potential to contain cultural deposits. The Qualified Archaeologist, in consultation with the Tribal Monitor, shall be responsible for determining the duration and frequency of monitoring.

Mitigation Measure TR-6:

Significant Resources The Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted of any pre-contact and/or historic-era cultural resources discovered during project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a Cultural Resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with YSMN, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents YSMN for the remainder of the project, should YSMN elect to place a monitor on-site.

Mitigation Measure TR-7:

Project Documents Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to YSMN. The Lead

Agency and/or applicant shall, in good faith, consult with YSMN throughout the life of the project.

Mitigation Measure TR-8:

Final Report: The final report[s] created as a part of the project (AMTP, isolate records, site records, survey reports, testing reports, etc.) shall be submitted to the Lead Agency and Consulting Tribe[s] for review and comment. After approval of all parties, the final reports are to be submitted to the Eastern Information Center, and the Consulting Tribe[s].

In the event of an accidental discovery of cultural and/or historical resources at the site; implementation of mitigation measures CR-1 and CR-2, and TR-1 – TR-6 will ensure impacts would remain less than significant. Therefore, impacts to tribal cultural resources would be less than significant.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	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, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

a) **Less Than Significant.** The Project Site is located within the City of Redlands water service area. There are existing water lines with sufficient capacity to serve the Proposed Project's water demands along Califiornia Street and Lugonia Avenue that the Proposed Project would connect to.

The Project Site is located within the City of Redlands sewer collection and wastewater treatment service area. There are existing water lines with sufficient capacity to serve the Proposed Project's sewer demands along Califiornia Street and Lugonia Avenue that the Proposed Project would connect to.

The new development is expected to have 14.32 acres of impervious land (approximately 89 percent) and 1.72 acres of pervious land (approximately 11 percent), totaling to approximately 16 acres. Post-development surface runoff will be collected by catch basins and conveyed to the onsite underground infiltration system, which is sized to capture the WQMP's (designed capture volume) DCV, on the west side of the Project Site. Catch basin filters will be added to each of the site's storm drain catch basins as a pre-treatment unit in addition to the CDS unit (Continuous Deflective System) that is sized based on treatment flow from the site. Once the infiltration system reaches the WQMP's DCV capacity it will overflow and discharge into an existing lateral at the northwest property corner along Lugonia Avenue. Ultimately, runoff will be conveyed to the Mission Channel, Santa Ana River, and Prado Flood Control Basin.

SCE would provide electrical service for the Proposed Project. The Proposed Project would receive electrical power by connecting to SCE's existing service lines in California Street and Lugonia Avenue adjacent to the Project Site. SCE provided electrical service to the previous and currently vacated water park.

The Southern California Gas Company (SoCalGas) provides natural gas service to the area of the Project Site and previously provided service to the currently vacated water park. Therefore, the Proposed Project would receive natural gas from SoCalGas by connecting to the existing line located in California Street adjacent to the Project Site.

There is existing telephone service available to the Proposed Project as previously provided by the prior use.

The Proposed Project is not anticipated to require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

b) **Less than Significant.** The Project Site is located within the City of Redlands water service area. Redlands' water supply primarily comprises surface water from the Santa Ana River (SAR) and Mill Creek and supplemented by groundwater extracted from the Bunker Hill Basin (part of the San Bernardino Basin) and Yucaipa Basin and a small amount of imported water when needed.[42] The Urban Water Management Plan (UWMP) for City of Redlands is based on projected growth included in General Plans for areas within their service area.

Per UWMP requirements, Redlands has evaluated reliability for an average year, single dry year, and a 5 consecutive dry year period. Redlands' demands in single dry years are assumed to increase by 10 percent above normal year demands. According to the UWMP, he local groundwater basins that Redlands produces water from have storage for use in dry years Redlands' supplies are 100 percent reliable during normal and single dry years.[43] Moreover, Redlands can produce the volume of water needed to meet 100 percent of demands in multiple dry years.[44]

The Proposed Project is consistent with the land use and population projections included in the General Plan. Therefore, the Proposed Project water demand is already anticipated from buildout of the General Plan Planning Area. Since the City has sufficient water supplies to meet current and future development consistent with its General Plan through the year 2035, additional water storage and treatment facilities are not anticipated to be required through build out of the General Plan in 2035.

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

c) **Less Than Significant.** Sewer service in the General Plan Planning Area is provided by the City of Redlands. The Redlands Wastewater Treatment Plant (WWTP) has a secondary treatment capacity of 9.5 million gallons per day (mgd).[45] Approximately 6 million gallons of that capacity is in a membrane bioreactor system, the remaining 3.5 million gallons is in a conventional activated sludge process. The WWTP meets all current regional, State, and federal requirements for secondary treatment. The City regularly samples the WWTP's influent and effluent to ensure compliance with State regulations. Current regulations require compliance with water quality standards and these measures would preclude development lacking adequate utility capacity, including wastewater treatment capacity. The Proposed Project would be reviewed by the City and the applicable wastewater providers to determine that sufficient sewer capacity exists to serve the additional population that would be generated by project. The City would continue to coordinate with the wastewater service providers to ensure that new development would not exceed the capacity of wastewater conveyance and treatment facilities. The Proposed Project would

[42] Water Systems Consulting, Inc. and Woodard & Curran. 2020 Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan.
[43] Water Systems Consulting, Inc. and Woodard & Curran. 2020 Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan.
[44] Water Systems Consulting, Inc. and Woodard & Curran. 2020 Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan.
[45] Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.

be required to pay development impact fees based on the volume of wastewater generated. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

d) **Less than Significant.** Solid waste from Redlands is primarily disposed of at the California Street Landfill operated by the Quality of Life Department and the San Timoteo Sanitary Landfill operated by the County, both within the city limits. The California Street Landfill is located at 2151 Nevada Street and encompasses 115 acres. The landfill has a maximum permitted capacity of 11.4 million cubic yards. It has a maximum permitted throughput of 829 tons per day. As of July 25, 2018, it has a remaining capacity of 5,168,182 cubic yards.[46] The San Timoteo Sanitary Landfill is located on San Timoteo Canyon Road and is 366 acres in size. It has a maximum permitted capacity of 23,685,785 cubic yards and a maximum permitted daily throughput of 2,000 tons. As of April 30, 2019, the remaining capacity was 12,360,396 cubic yards.[47] The Proposed Project consists of a new warehouse supply facility and storage yard. According to CalRecycle's estimated solid waste generation rates for industrial uses, the Proposed Project would generate at most, approximately 2,786 pounds of solid waste per day or approximately 1.4 tons per day, based on 8.93 pounds per employee per day.[48] Therefore, the Proposed Project solid waste generation contribution to these landfills would be nominal and would not exceed the daily permitted capacities of these facilities. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

e) **Less than Significant.** The Proposed Project would be required to comply with City of Redlands Municipal Chapter 13.66 (Recycling Requirements for Specified Developmental Activity). Chapter 13.66 establishes requirements for recycling by specified development activities to facilitate the City's compliance with state recycling mandates, remove architectural barriers to recycling and ensure the recycling of construction and demolition. The Project Applicant is required to coordinate with a waste hauler to collect solid waste on a common schedule as established in applicable local, regional, and State programs. The Proposed Project shall adhere the California Integrated Waste Management Act of 1989 (AB 939), AB 1327, Chapter 18 (California Solid Waste Reuse and Recycling Access Act of 1991), and any other applicable local, State, and federal solid waste management regulations. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

[46] CalRecycle. Solid Waste Information System database. Accessed February 5, 2024.
[47] CalRecycle. Solid Waste Information System database. Accessed February 5, 2024.
[48] CalRecycle. Estimated Solid Waste Generation Rates. Accessed February 5, 2024.

XX. WILDFIRE

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

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

a) **Less than Significant.** As stated previously, the Proposed Project would provide more than the required number of parking spaces. Therefore, project vehicles are not anticipated to park off-site and interfere with external traffic. The Project Site does not contain any emergency facilities.[49] It is adjacent to Lugonia Avenue, California Street, and the I-10 of which the I-10 is classified as an evacuation route.[50] During construction, the contractor would be required to maintain adequate emergency access for emergency vehicles as required by the City. The Proposed Project would provide more parking spaces than required, thereby keeping project vehicles off the public right of way.

Additionally, the California Emergency Services Act requires the City to manage and coordinate the overall emergency and recovery activities within its jurisdictional boundaries. The City's Emergency Operations Plan includes policies and procedures to be administered by the City in the event of a disaster. During disasters, the City of Redlands is required to coordinate emergency operations with the County of San Bernardino. Policies within the City's General Plan and updates to the City's Emergency Plan, as required by

[49] San Bernardino County. Countywide Policy Plan web maps: PP-1 "Critical Facilities." Accessed December 14, 2023.
[50] San Bernardino County. Countywide Policy Plan web maps: PP-2 "Evacuation Routes." Accessed December 14, 2023.

State law, would ensure the Proposed Project would not interfere with adopted policies and procedures. Therefore, no significant impacts have been identified or are anticipated, and no mitigation measures are required.

b) **Less than Significant.** The Project Site is located in an area with moderate threat to fire hazards.[51] It is not located in a very high fire hazard zone.[52] The property is located in an urban area and surrounded primarily by developed land. The Project Site is not located adjacent to or near wildlands. Therefore, the Proposed Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. No significant impacts are identified or anticipated, and no mitigation measures are required.

c) **Less than Significant.** The Proposed Project would not require the installation or maintenance of associated infrastructure; existing infrastructure is of sufficient capacity to serve the use, The Project Site is not located within a Very High Fire Hazard Severity Zone.[53] The proposed warehouse facility would replace the vacated developed lot with on site a warehouse building with fire safety and fire suppression design elements, and proper landscaping, thereby reducing the risk of wildfire. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

d) **Less than Significant.** Similar to adjacent properties, the Project Site is relatively flat. No hillside areas or natural areas prone to wildfire fire are located in the immediate vicinity. Therefore, the Proposed Project would not expose persons or structures to post-fire slope instability or post-fire drainage. No significant impacts are identified or are anticipated, and no mitigation measures are required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE:

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
a) Does the project have the potential to 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, 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?	☐	☒	☐	☐

[51] Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.7-3: Fire Hazards and Fire Safety Services.
[52] San Bernardino Countywide Plan. HZ-5 Fire Hazard Severity Zones. Accessed on December 21, 2023.
[53] San Bernardino Countywide Policy Plan Draft EIR. Hazards and Hazardous Materials. Figure 5.8-6" Fire Severity and Growth Areas in the East Desert Regions."

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

a) **Less than Significant with Mitigation**. The Project Site is located in a developed area mixed with industrial and commercial uses. The property has been graded and paved from a previous amusement park in 2018 that has been vacated. The Proposed Project would redevelop the Project Site as a warehouse facility in compliance with development standards set for the City of Redlands EV/SD zoning district. Therefore, because the site has been previously developed, the Proposed Project would not involve habitat modifications or activities that would have adverse effects on biological resources. Although the Project Site has been fully graded, the Proposed Project would involve grading and other earthwork that could potentially unearth unknown historic and archeological resources. To ensure potential impacts to these resources is reduced to a less than significant level, Mitigation Measure CR-1, CR-2, and GEO-2 shall be implemented.

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

(a) Cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable.

(b) The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided of the effects attributable to the project. The discussion should be guided by the standards of practicality and reasonableness.

<u>Air Quality</u>

By its very nature, air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development within the SCAB, and this regional impact is cumulative rather than being attributable to any one source. A

project's emissions may be individually limited, but cumulatively considerable when taken in combination with past, present, and future development projects. Projects that would not exceed the thresholds of significance would not contribute a cumulatively considerable amount of criteria air pollutant emissions to the region's emissions profile and would not impede attainment and maintenance of ambient air quality standards. As summarized previously, construction activities and project operations would not exceed the SCAQMD regional and localized thresholds of significance.

Greenhouse Gas

The quantity of GHGs that it takes to ultimately result in climate change is not precisely known; however, no single project alone is expected to measurably contribute to a noticeable incremental change in the global average temperature, or to a global, local, or micro-climate. Therefore, the geographic scope of consideration for GHG emissions is on a global scale and as such, emissions contribute, on a cumulative basis, to global climate change. The Project would generate approximately 1,708 MT CO2e per year and would not exceed the SCAQMD's adopted significance threshold of 10,000 MT CO2e per year. Furthermore, the Proposed Project would not conflict with plans, policies, or regulations for the purpose of reducing GHG emissions. As such, implementation of the Proposed Project and its incremental contribution to global climate change would not be considered significant.

c) **Less the Significant with Mitigation**. The development of the Proposed Project would not cause adverse impacts on humans, either directly or indirectly. The Proposed Project is not within a geologic fault zone, and therefore would not be subject to significant seismic hazards. As concluded in Section III. Air Quality, the Proposed Project non-cancer chronic hazard index is below the SCAQMD threshold of 1.0 for both residential and worker sensitive receptors. Therefore, with the implementation of Mitigation Measures CUL 1-2, GEO 1-2, and TR 1-8, the Proposed Project would not expose sensitive receptors to substantial pollutant concentrations.

SECTION 4
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