

## EXHIBIT C

### Initial Study

77 0100

## SAN BERNARDINO COUNTY INITIAL STUDY ENVIRONMENTAL CHECKLIST FORM

This form and the descriptive information in the application package constitute the contents of Initial Study pursuant to County Guidelines under Ordinance 3040 and Section 15063 of the State CEQA Guidelines.

### PROJECT LABEL:

<p><b>APN:</b> 0292-052-26 <b>APPLICANT:</b> NEWCASTLE PARTNERS, Inc. <b>COMMUNITY:</b> REDLANDS/2ND SUPERVISORIAL DISTRICT <b>LOCATION:</b> SAN BERNARDINO &amp; NEVADA ST. SOUTHWEST CORNER <b>PROJECT No:</b> P201300214/CUP</p> <p><b>STAFF:</b> KEVIN WHITE <b>REP(S):</b> VISTA (Jakki Tonkovich) <b>PROPOSAL:</b> CONDITIONAL USE PERMIT FOR THE CONSTRUCTION OF A MAXIMUM 318,000 SQUARE FOOT INDUSTRIAL BUILDING WITH 10,000 SQUARE FEET OF OFFICE AREA TO BE USED AS A HIGH CUBE WAREHOUSE DISTRIBUTION FACILITY ON 12.98 ACRES (565,408.8 SQUARE FEET).</p>	<p><b>USGS Quad:</b> REDLANDS, CALIF. <b>T, R, Section:</b> T1S, R3W, Section: 16 <b>Thomas Bros.:</b> Page: 607, Grid: H5</p> <p><b>Planning Area:</b> EAST VALLEY SPECIFIC PLAN / SPECIAL DEVELOPMENT</p> <p><b>OLUD:</b> No change. <b>Overlays</b> N/A</p>
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### PROJECT CONTACT INFORMATION:

**Lead agency:** County of San Bernardino  
Land Use Services Department - Current Planning  
385 North Arrowhead Avenue  
San Bernardino, CA 92415-0182

**Contact person:** Kevin White, Senior Planner  
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**Project Sponsor:** Newcastle Partners, Inc.  
4740 Green River Road, #118  
Corona, CA 9800  
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**Fax No:** (951) 278-4740

### PROJECT DESCRIPTION:

The proposed project (Project) is a Conditional Use Permit to establish a maximum 318,000 square-foot industrial building to be used as a "High Cube" warehouse distribution facility on 14.84 gross and 12.98 net acres. The building will include a maximum 10,000 square feet of office area, and a 15,845 square foot mezzanine.

High Cube Warehouse is defined as "Warehouse/Distribution Centers used primarily for the storage and/or consolidation of manufactured goods prior to their distribution to retail locations or other warehouse centers. These facilities are typically constructed utilizing concrete tilt-up technique, with a typical ceiling height of at least 24 feet. Warehouse/Distribution Centers are generally greater than 100,000 square feet in size with a land coverage ratio of approximately 50% and a dock-high loading ratio of approximately 1:5,000-10,000 square feet. They are characterized by a small employment count due to a high level of automation."

The percentage of building coverage is 56% ( $569,408.8 / 317,400 = 56\%$ ) of the net site area. Landscaping covers 15% ( $569,408.8 / 87,503 = 15\%$ ) of the net site area, which meets the requirement under the East

Valley Area Plan and the County Development Code. The project will be a balanced grading operation with 22,608 cubic yards of cut and fill.

#### **ENVIRONMENTAL/EXISTING SITE CONDITIONS:**

The proposed Project is located at the southwest corner of the Nevada Street and San Bernardino Avenue intersection in the County of San Bernardino (County). The Project site is in the unincorporated portion of San Bernardino County, in the East Valley Area Plan. The current land use zoning designation of the site is East Valley/Special Development (EV/SD) Land Use Zoning District. This property is subject to the Airport Safety Review Area III (AR-3). The Project is in the Third Supervisorial District and is not in the City of Redlands Sphere of Influence. The natural topography of the Project site is relatively flat. The site was previously a citrus grove and is currently undeveloped land covered with a sparse growth of natural grasses and weeds. Numerous rows of tree stumps remain below ground from the recent demolition.

AREA	EXISTING LAND USE	OFFICIAL LAND USE DISTRICT
Site	Vacant	EV/SD
North	Warehouse/Distribution	EV/SD
South	Industrial	EV/SD
East	Warehouse/Distribution Centers	EV/SD
West	Agricultural & Vacant	EV/SD

Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):

Federal: Federal Aviation Administration

State of California: Regional Water Quality Control Board (RWQCB), South Coast Air Quality Management District (AQMD).

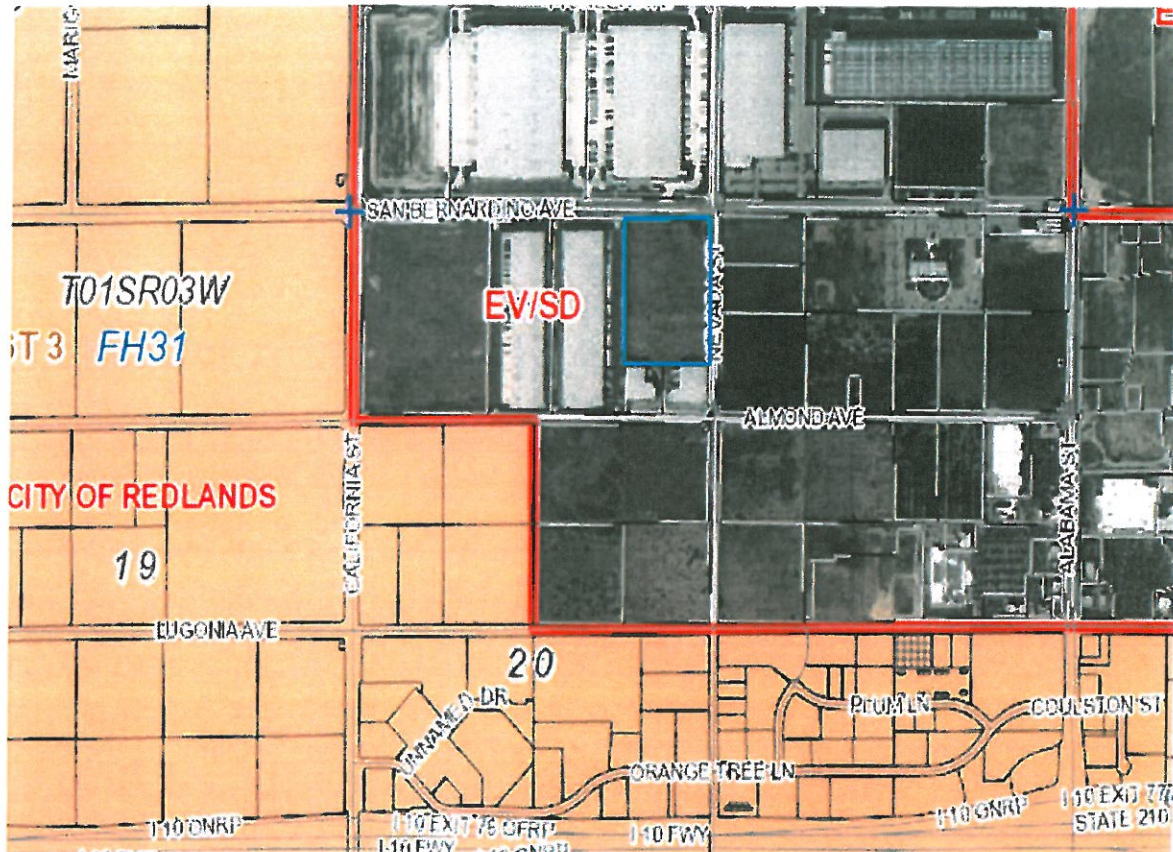
County of San Bernardino: Land Use Services – Planning, Code Enforcement, Building and Safety, Public Health-Environmental Health Services, Special Districts, Public Works. County Fire, and

Local: Local Agency Formation Commission (LAFCO), San Bernardino International Airport Authority (Aviation Easement), Special District CSA 70, City of Redlands by special agreement provides water, sewer, sanitation, police and fire services to this area.

## REGIONAL VICINITY MAP



### LOCAL VICINITY MAP



## **EVALUATION FORMAT**

This initial study is prepared in compliance with the California Environmental Quality Act (CEQA) pursuant to Public Resources Code Section 21000, et seq. and the State CEQA Guidelines (California Code of Regulations Section 15000, et seq.). Specifically, the preparation of an Initial Study is guided by Section 15063 of the State CEQA Guidelines. This format of the study is presented as follows. The project is evaluated based upon its effect on seventeen (17) 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 Incorporated	Less than Significant	No Impact
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Substantiation is then provided to justify each determination. One of the four following conclusions is then provided as a summary of the analysis for each of the major environmental factors.

1. **No Impact:** No impacts are identified or anticipated and no mitigation measures are required.
2. **Less than Significant Impact:** No significant adverse impacts are identified or anticipated and no mitigation measures are required.
3. **Less than Significant Impact with Mitigation Incorporated:** 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 of mitigation measures)
4. **Potentially Significant Impact:** Significant adverse impacts have been identified or anticipated. An Environmental Impact Report (EIR) is required to evaluate these impacts, which are (List of the impacts requiring analysis within the EIR).

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

## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

## DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation, the following finding is made:

<input type="checkbox"/>	The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION shall be prepared.
<input checked="" type="checkbox"/>	Although the proposed project could have a significant effect on the environment, there shall 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 shall be prepared.
<input type="checkbox"/>	The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
<input type="checkbox"/>	The proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
<input type="checkbox"/>	Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature: prepared by Kevin White, Planner III

January 29, 2014  
Date

Signature: Dave Prusch, Supervising Planner  
Planning Division

January 29, 2014  
Date

Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
<b>I. AESTHETICS - Would the project</b>				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**SUBSTANTIATION:** (Check ☐ if project is located within the view-shed of any Scenic Route listed in the General Plan):

- a) **No Impact.** The proposed project is not located within a designated Scenic Corridor and will not have a substantial adverse effect on a scenic vista, as there are none identified within the vicinity of the project site that would be affected by the proposed development. The proposed project is consistent with other surrounding development in the area and is architecturally compatible with the visual character of the surrounding area. Therefore, no impacts would occur and no mitigation measures are required.
- b) **No Impact.** The proposed project is not located on or within close proximity of a state scenic highway and therefore will not substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. There are no existing rock outcroppings or historic buildings present on the site. Therefore, no impacts would occur and no mitigation measures are required.
- c) **Less than Significant Impact.** The proposed project will not substantially degrade the existing visual character or quality of the site and its surroundings, because the project is consistent with the planned visual character of the area and will incorporate the approved design guidelines found in the East Valley Planning Area, including landscaping and the provision of walls/fences, landscaping and screening of exterior mechanical equipment, loading and storage areas. Therefore, no significant adverse impacts are anticipated and no mitigation measures are required.
- d) **Less than Significant Impact.** The proposed project will not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area because all lighting proposed onsite will be designed in accordance with the East Valley Area Plan Design Standards and the County Development Code. These standards and code requirements will ensure that the project will not create a new source of substantial light or glare by requiring lighting to be shielded or hooded. A lighting plan will be required as a condition of approval for this project. Therefore, no significant adverse impacts are anticipated and no mitigation measures are required.

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

Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
<b>II. AGRICULTURE AND FORESTRY RESOURCES</b> - In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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**SUBSTANTIATION:** (Check ☐ if project is located in the Important Farmlands Overlay):

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- a) **Less than Significant Impact.** This site is identified as Farmland of Statewide Importance by the Department of Conservation. The County of San Bernardino General Plan contemplated the loss of designated farmland in its 2007 EIR. In it, the County found that the loss of designated farmland would occur, especially in the project area. However the project site is located in an area that does not contain prime agricultural soils, and was re-zoned for urban development with the adoption of the East Valley Area Plan in the 1990s. The area surrounding the project site has been rapidly changing from agricultural uses and grazing land to urban uses, in accordance with the East Valley Area Plan.
- b) **No Impact.** The subject property is not designated or zoned for agricultural use and the proposed project does not conflict with any agricultural land use or Williamson Act land conservation contract. Therefore, no impacts would occur and no mitigation measures are required.
- c) **No Impact.** The proposed project would not 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)). The proposed project area is currently vacant land, which has never been designated as forest land or timberland. No rezoning of the project site would be required as the proposed project is compatible with the current zoning designation. The proposed project would not cause the rezoning of forest land, timberland, or timberland zoned Timberland Production. Therefore, no impacts would occur and no mitigation measures are required.
- d) **No Impact.** The proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. The proposed project area is currently vacant land, which has never been designated as forest land or timberland. The proposed project does not include forest land. The proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impacts would occur and no mitigation measures are required.
- e) **Less than Significant Impact.** The proposed project will not involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to a non-agricultural use because, although the project involves the development of a warehouse facility, the site is currently not used for agricultural purposes. Therefore, no significant adverse impacts are anticipated and no mitigation measures are required.

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

Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
<b>III. AIR QUALITY</b> - Where available, the significance criteria established by the applicable air quality management or air pollution control district might be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**SUBSTANTIATION:** (Discuss conformity with the South Coast Air Quality Management Plan, if applicable):

The proposed project analysis included the preparation of *San Bernardino Avenue & Nevada Street Project - Air Quality, Global Climate Change, and Health Risk Assessment* prepared by Kunzman Associates, Inc., June 17, 2013.

- a) **Less than Significant Impact.** The Air Quality Management Plan (AQMP) for the South Coast Air Basin (SCAB) sets forth a comprehensive program that will lead the SCAB into compliance with all Federal and State air quality standards. The AQMP control measures and related emission reduction estimates are based upon emissions projections for a future development scenario derived from land use, population, and employment characteristics defined in consultation with local governments. Accordingly, conformance with the AQMP for development projects is determined by demonstrating compliance with local land use plan and/or population projections.

An air quality analysis for the project was prepared by Kunzman Associates, Inc., June 17, 2013. The air quality analysis was prepared to evaluate whether the expected criteria air pollutant emissions generated from the project would cause significant impacts to air resources in the project area. Construction-related and operational emissions of criteria pollutants and toxic air contaminants were modeled and analyzed for the proposed project. Cumulative impacts were analyzed using the SCAQMD Air Quality Handbook. The results of the air quality study found that none of the analyzed criteria pollutants would exceed the regional emissions thresholds. Therefore, a less than significant regional air quality impact would occur from construction of the proposed project and no mitigation measures are required.

- b) **Less than Significant.** The proposed project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. The proposed project's construction-

related air emissions from fugitive dust and on-site diesel emissions may have the potential to exceed the State and Federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the South Coast Air Basin.

The local air quality emissions from construction were analyzed using the SCAQMD's Mass Rate Localized Significant Threshold Look-up Tables and the methodology described in *Localized Significance Threshold Methodology*, prepared by SCAQMD, revised July 2008. The Look-up Tables were developed by the SCAQMD in order to readily determine if the daily emissions of CO, NOx, PM10, and PM2.5 from the proposed project could result in a significant impact to the local air quality. The emission thresholds were calculated based on the Central San Bernardino Valley source receptor area and a disturbance of five acres per day. For PM10 and PM2.5, which are based on a 24-hour standard, the nearest sensitive receptors are the proposed 306 unit multi-family residential project, which is as near as 1,300 feet (396 meter) southeast of the project site. Since the Look-up Tables only provide emissions thresholds for 25, 50, 100, 200 and 500 meters, the PM10 and PM2.5 emissions thresholds were calculated through interpolation.

For NOx, which is based on a 1-hour threshold and CO, which is based on an 8-hour threshold, the nearest sensitive receptors are the off-site workers located in the industrial uses immediately adjacent to the west and south of the project site. According to LST Methodology, any receptor located closer than 25 meters (82 feet) shall be based on the 25 meter thresholds and is what was utilized for CO and NOx. The data provided in the Kunzman Associates, Inc., June 17, 2013 study shows the on-site emissions from the CalEEMod model for the different construction phases and the calculated emissions thresholds.

The data provided in the Kunzman Associates, Inc., June 17, 2013 study shows that none of the analyzed criteria pollutants would exceed the calculated local emissions thresholds at the nearest sensitive receptors. A less than significant local air quality impact would occur from construction of the proposed project.

Both short-term and long-term emissions from the project do not exceed the SCAQMD established significance thresholds. Therefore, no significant adverse impacts are anticipated and no mitigation measures are required.

Additionally, the project will not violate any air quality standard or contribute substantially to an existing or projected air quality violation, because the proposed use(s) do not exceed established thresholds of concern as established by the District. Therefore, no significant adverse impacts are anticipated and no mitigation measures are required.

- c) **Less than Significant Impact.** The portion of the South Coast Air Basin within which the project is located, is designated as a non-attainment area for ozone and PM-10 under state standards, and as a non-attainment area for ozone, carbon monoxide, PM-10, and PM-2.5 under federal standards. In evaluating the cumulative effects of the project, Section 21100(e) of CEQA states that "*previously approved land use documents including, but not limited to, general plans, specific plans, and local coastal plans, may be used in cumulative impact analysis.*" In addressing cumulative effects for air quality, the AQMP utilizes approved general plans and, therefore, is the most appropriate document to use to evaluate cumulative impacts of the subject project. This is because the AQMP evaluated air quality emissions for the entire south coast air basin using a future development scenario based on population projections and set forth a comprehensive program that would lead the region, including the project area, into compliance with all federal and state air quality standards. Since the proposed project is in conformance with the AQMP and project emissions have been found to be less than significant on both a regional and local level, the project will not result in a cumulatively considerable net increase of any criteria pollutant. Therefore, no significant adverse impacts are anticipated and no mitigation measures are required.

- d) **Less than Significant Impact.** Project-related air emissions from on-site sources such as architectural coatings, landscaping equipment, on-site usage of natural gas appliances as well as the operation of vehicles on-site may have the potential to exceed the State and Federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the South Coast Air Basin. The nearest sensitive receptor that may be impacted by the proposed project is an existing single-family home located approximately 79 meters (260 feet) northeast of the project site.

The local air quality emissions from on-site operations were analyzed according to the methodology described in *Localized Significance Threshold Methodology*, prepared by SCAQMD, revised July 2008. The Look-up Tables were developed by the SCAQMD in order to readily determine if the daily emissions of CO, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> from the proposed project could result in a significant impact to the local air quality. The proposed project was analyzed based on the Central San Bernardino Valley source receptor area and a five acre project site.

For PM<sub>10</sub> and PM<sub>2.5</sub>, which are based on a 24-hour standard, the nearest sensitive receptors are the proposed 306 unit multi-family residential project, which is as near as 1,300 feet (396 meter) southeast of the project site. Since the Look-up Tables only provide emissions thresholds for 25, 50, 100, 200 and 500 meters, the PM<sub>10</sub> and PM<sub>2.5</sub> emissions thresholds were calculated through interpolation. For NO<sub>x</sub>, which is based on a 1-hour threshold and CO, which is based on an 8-hour threshold, the nearest sensitive receptors are the off-site workers located in the industrial uses immediately adjacent to the west and south of the project site. According to LST Methodology, any receptor located closer than 25 meters (82 feet) shall be based on the 25 meter thresholds and is what was utilized for CO and NO<sub>x</sub>.

The data provided in the Kunzman Associates, Inc., June 17, 2013 study shows that the on-site emissions from the CalEEMod model that includes natural gas usage, landscape maintenance equipment, and vehicles operating on-site and the calculated emissions thresholds. Since the data provided in the Kunzman Associates, Inc., June 17, 2013 study shows that the on-going operations of the proposed project would not exceed the local NO<sub>x</sub>, CO, PM<sub>10</sub> and PM<sub>2.5</sub> thresholds of significance discussed above in Section V. The on-going operations of the proposed project would create a less than significant operations-related impact to local air quality due to on-site emissions and no mitigation would be required.

- e) **Less than Significant Impact.** The project may create odors during the construction and operation phases. Potential sources that may emit odors during construction activities include the application of materials such as asphalt pavement. The objectionable odors that may be produced during the construction process are of short-term in nature and the odor emissions are expected cease upon the drying or hardening of the odor producing materials. Due to the short-term nature and limited amounts of odor producing materials being utilized, no significant impact related to odors would occur during construction of the proposed project. Potential sources that may emit odors during the on-going operations of the proposed project would include odor emissions from diesel truck emissions and trash storage areas. Due to the distance of the nearest receptors from the project site and through compliance with SCAQMD's Rule 402 no significant impact related to odors would occur during the on-going operations of the proposed project. Therefore, no significant adverse impacts related to potential odors during construction and operation is anticipated and no mitigation measures are required.

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

Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
<b>IV. BIOLOGICAL RESOURCES - Would the project:</b>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc...) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**SUBSTANTIATION:** The proposed project analysis included the preparation of *Results of a Habitat Suitability Evaluation, ±13-acre Site, Redlands Area of San Bernardino County, California* prepared by Ecological Sciences, Inc., May 11, 2013.

- a) **Less than Significant Impact.** The site is historically characterized as a citrus orchard with a few small remnant trees present. Currently the site has been entirely disced. What little vegetation remains consists of invasive, non-native plant species. Remnants of an old residential structure that has long since been demolished is present in the northeastern portion of the site. Various ornamental trees remain around the structure. Debris dumping is present along the southern property boundary. A row of ornamental Mexican fan palm (*Washingtonia robusta*) lines the eastern border along Nevada Street. Surrounding land uses include commercial development, agriculture, and vacant areas similar in composition as the subject site. Elevation is approximately 1,180 above

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mean sea level (msl).

The existing degraded condition of the project site is the direct consequence of long-standing disturbances that has resulted in low biological diversity (e.g., dominance of non-native species), absence of special-status plant communities, and overall low potential for special-status species to utilize or reside within areas proposed for direct impacts. Construction activities would not be expected to directly impact federal- or state-listed threatened or endangered species, jeopardize the continued existence of listed species (or special-status species), nor directly impact designated critical habitat. Project site development would also not be expected to substantially alter the diversity of plants or wildlife in the area because of current degraded site conditions.

Although no native habitat types are present, and no listed species are expected to occur due to absence of suitable habitat, the potential presence of some resources (e.g., native nesting birds) may impose some degree of constraint to development depending upon the nature of both direct and indirect impacts on these resources (if present), as well as on the particular species and seasonal timing of construction activities. Survey results currently suggest that no CEQA-significant impacts to special-status species are initially expected as a result of site development provided those measures discussed above are implemented to avoid or reduce possible project-related impacts to potentially occurring sensitive biological resources.

Thus, this project will not have an effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. Therefore, no significant adverse impacts are anticipated and no mitigation measures are required.

- b) **No Impact.** This project will not have an 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 because the project site does not contain riparian habitat or other sensitive natural community. The ruderal plant community on site is not considered to be a sensitive plant community. Therefore, no impacts would occur and no mitigation measures are required.
- c) **No Impact.** This project will not have an effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means, because the project is not within an identified protected wetland. Therefore, no impacts would occur and no mitigation measures are required.
- d) **No Impact.** This project will not interfere 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 because there are no such corridors or nursery sites within or near the project site. The project site is currently undeveloped but is located in an area which continues to develop over time. The project site is not a wildlife corridor nor is it used as a wildlife corridor. Therefore, no impacts would occur and no mitigation measures are required.
- e) **Less than Significant with Mitigation Incorporated.** The project site has linear rows of palms along Nevada Street that are protected by County Ordinance. The proposed project requires dedication and road improvements along this right-of-way. A Mitigation measure will be required to ensure the protected palm trees are relocated adjacent to the rights of way, within the building setback.

- f) **No Impact.** The project area is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. There would be no take of critical habitat and, therefore, no land use conflict with existing management plans would occur. Therefore, no impacts would occur and no mitigation measures are required.

**Possible significant adverse impacts have been identified or anticipated and the following mitigation measures are required as conditions of project approval to reduce these impacts to a level below significant.**

**MM# Mitigation Measures**

- IV-1 Tree Removal.** A pre-construction inspection shall be required to verify the location and number of any locally-protected trees, including linear rows of palms along the street frontage. All healthy Mexican fan palm trees shall be relocated to an acceptable location, consistent with an approved landscape plan with the assistance of a certified arborist who shall submit a letter report documenting the transportation of all trees.

Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
<b>V. CULTURAL RESOURCES - Would the project</b>				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**SUBSTANTIATION:** (Check if the project is located in the Cultural ☐ or Paleontologic ☐ Resources overlays or cite results of cultural resource review):

- a) **Less than Significant Impact.** The project will not cause a substantial adverse change in the significance of a historical resource, because no resources have been identified on the site. Therefore, no impacts would occur and no mitigation measures are required.
- b) **Less than Significant.** This project will not cause a substantial adverse change in the significance of an archeological resource, because no resources have been identified on the site. To further reduce the potential for impacts, a standard condition of approval will be applied to the project, which requires the developer to contact the County Museum for a determination of appropriate measures if any finds are made during project construction. Therefore, no significant adverse impacts are anticipated and no mitigation measures are required.
- c) **Less than Significant.** This project is not expected to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, because no resources have been identified in the cultural resources survey of the site. Furthermore, the alluvial soils in the area provide a low potential for discovery of paleontological resources. The standard condition mentioned above in V b will further reduce the potential for impacts. If anything should be found during project construction. Therefore, no significant adverse impacts are anticipated and no mitigation measures are required.
- d) **Less than Significant.** It is not anticipated that this project would disturb any human remains, including those interred outside of formal cemeteries, because no such burials grounds are known to exist on this project site. If any human remains are discovered during construction of this project, standard requirements in the Conditions of approval will require the developer to contact the County Coroner and the County Museum for a determination of appropriate measures to be taken. A Native American representative shall also be consulted if the remains are determined to be of potential Native American origin pursuant to Section 15064.5(e) of the CEQA Guidelines. Therefore, no significant adverse impacts are anticipated and no mitigation measures are required.

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**A standard condition of approval will be applied to the project to require the developer to contact the County Museum in the event of discovery of any artifact during construction, for instructions regarding evaluation for significance as a cultural or paleontological resource. No significant adverse impacts are identified or anticipated and therefore no mitigation measures are required.**