LAND USE SERVICES DEPARTMENT
PLANNING COMMISSION STAFF REPORT

HEARING DATE: March 23, 2023 **AGENDA ITEM #2**

Project Description

APN:	0292-055-03, 0292-055-04
Applicant:	XEBEC REALTY PARTNERS
Community/ Supervisorial District:	REDLANDS 3RD SUPERVISORIAL DISTRICT
Location:	77 Almond Avenue Redlands, CA
Project No:	PROJ-2022-00117
Staff:	Anthony DeLuca/Senior Planner
Rep:	Veronica Kim/Daniel Ricks
Proposal:	A Conditional Use Permit for the construction and operation of a 208,000-sf concrete tilt-up warehouse with 24 dock doors and including 6,000 sq. ft. of office area on approximately 9.55 acres on the south side of Almond Avenue in the Community of Redlands in unincorporated San Bernardino County.

Vicinity Map

7 Hearing Notices Sent On: March 8, 2023 **Report Prepared By: Anthony DeLuca**

SITE INFORMATION

Parcel Size: **9.55-acres**
Terrain: **Slightly sloping**
Vegetation: **SFR/Orange Grove**

SURROUNDING LAND DESCRIPTION:

Area	Existing Land Use	Land Use Category	Zoning District
Site	SFR/Orange Grove	Limited Industrial (LI)	East Valley/Special Development (EV/SD)
North	Warehouse	Limited Industrial (LI)	East Valley/Special Development (EV/SD)
South	Multiple Residential/Retail	Medium Density Residential (MDR)/Commercial (C)	East Valley/Special Development (EV/SD)
East	Warehouse	Commercial (C)	East Valley/Special Development (EV/SD)
West	Warehouse	Limited Industrial (LI)	East Valley/Special Development (EV/SD)

	AGENCY	COMMENT
City Sphere of Influence:	NA	NA
Water Service:	City of Redlands	Will Serve Letter Submitted
Sewer Service:	City of Redlands	Will Serve Letter Submitted

STAFF RECOMMENDATION: That the Planning Commission **ADOPT** the Mitigated Negative Declaration and MMRP; **ADOPT** the findings as contained in the staff report; **APPROVE** the Conditional Use Permit, subject to the Conditions of Approval; and **DIRECT** staff to file a Notice of Determination[1].

1. In accordance with Section 86.08.010 of the Development Code, the Planning Commission action may be appealed to the Board of Supervisors.

OFFICIAL LAND USE CATEGORY MAP

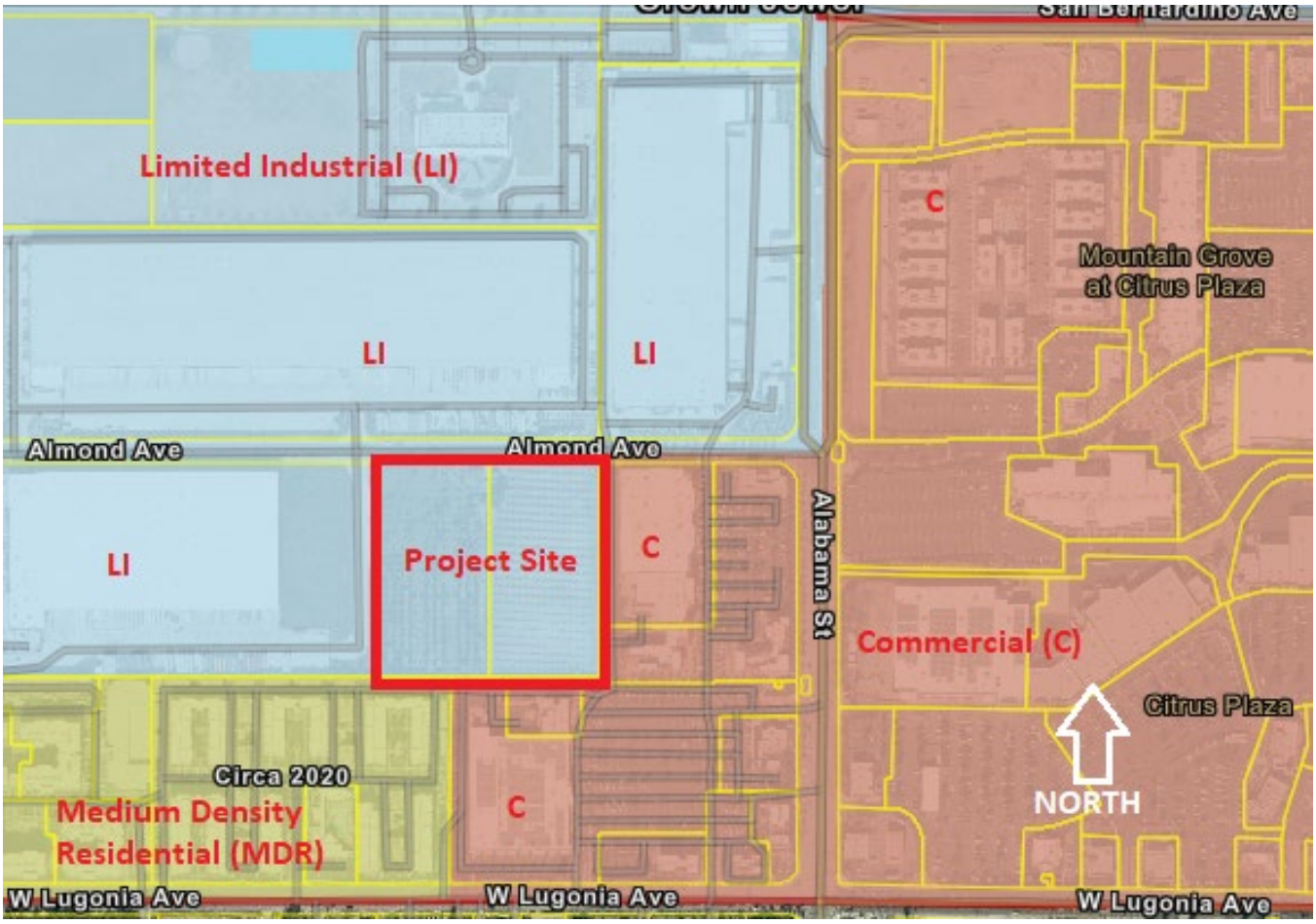

Figure 1 Current Countywide Plan/Policy Plan Land Use Designations

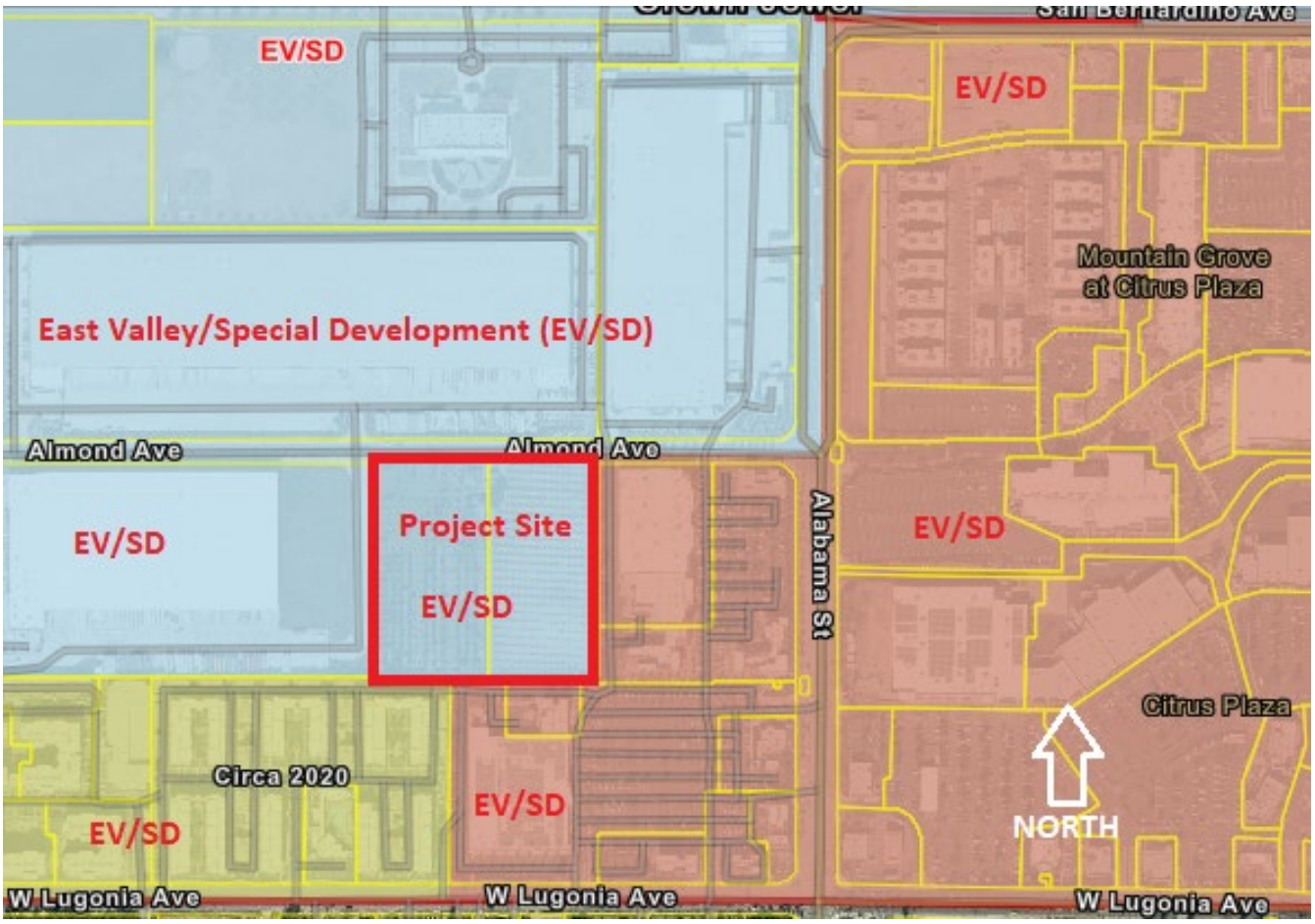

Figure 2 Current Zoning Designations

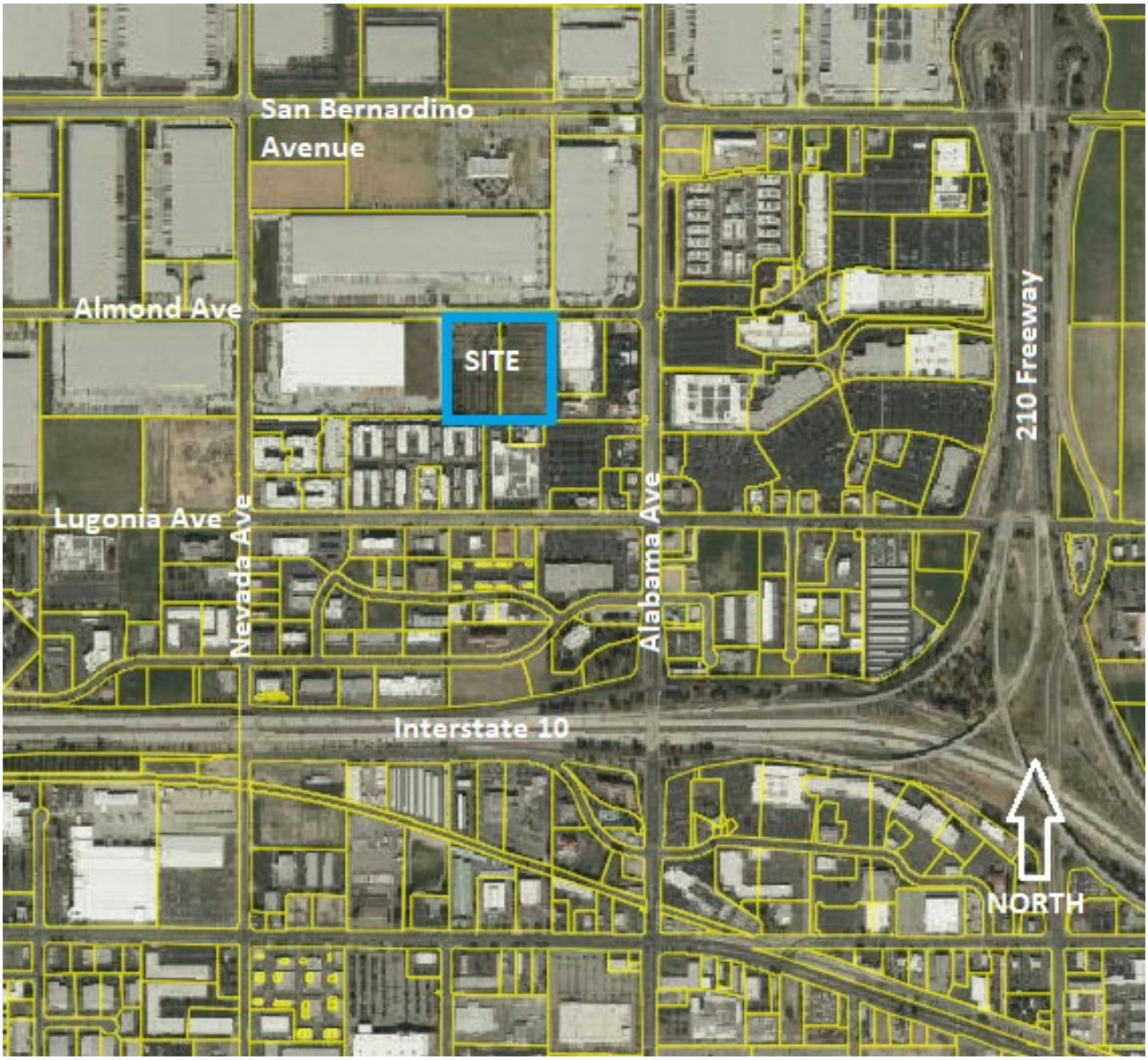

Figure 3 Aerial Vicinity Map

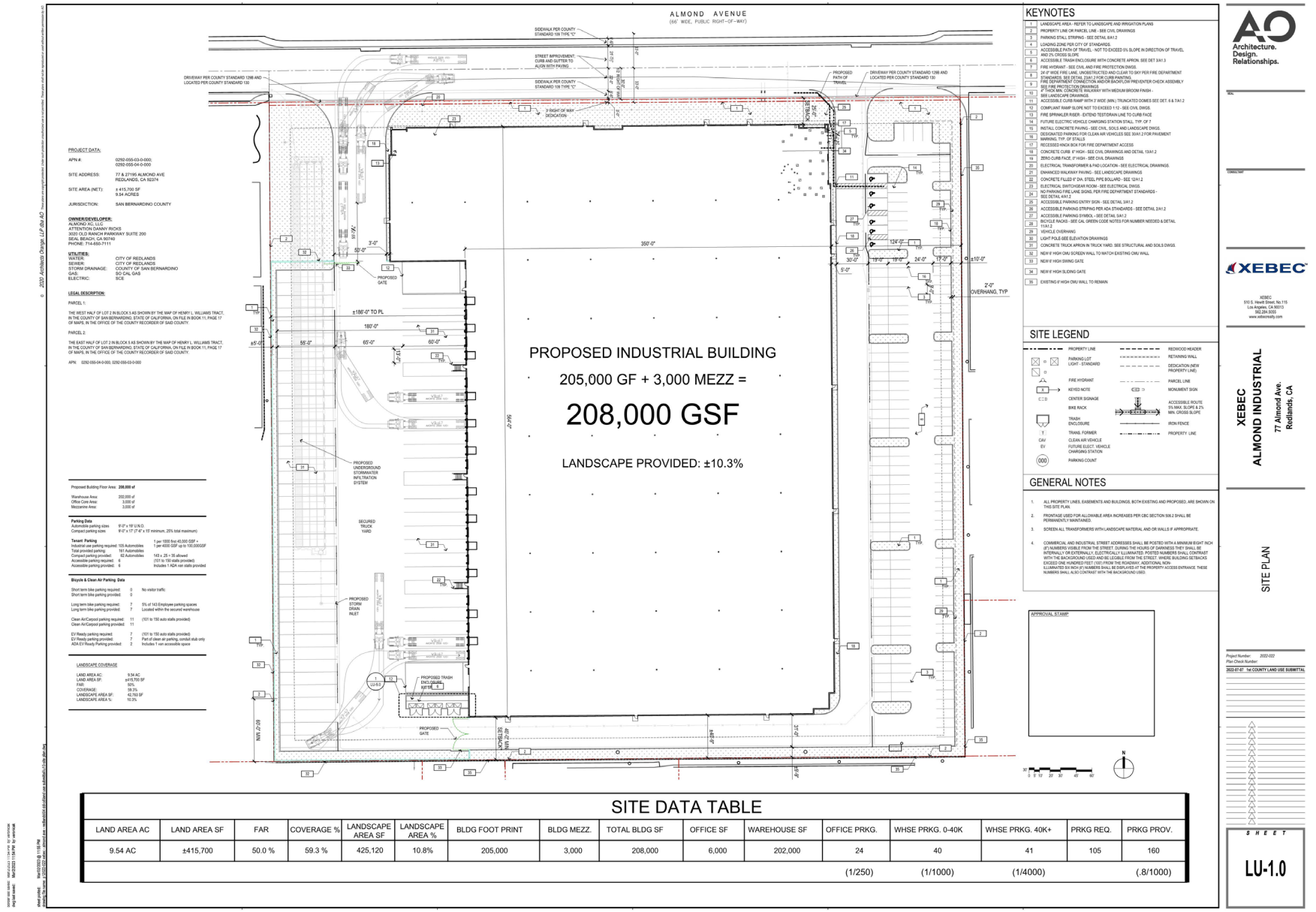

Figure 4 Proposed Site Plan

Site Photos

Photo Direction by Figure Number

Figure 5 View of Site looking southeast onto Parcel 0292-055-04

Figure 6 View of Site looking southeast from Parcel 0292-055-03

Figure 7 View of Site looking southwest with Existing Home

Figure 8 View of Site looking southwest onto Parcel 0252-055-04

PROJECT DESCRIPTION AND BACKGROUND:

The applicant is requesting approval of a Conditional Use Permit for the construction and operation of a 208,000-sf concrete tilt-up warehouse, including 6,000 square feet of office space and 24 dock doors on 9.55 acres (Project). The Project site is located on the south side of Almond Avenue between Nevada Street and Alabama Street in the East Valley Area Plan in the Third Supervisorial District (also known locally as the "Donut Hole" as it is totally surrounded by Redlands but is not within the Redlands sphere of influence). The two parcel addresses are 77 and 27195 Almond Avenue, Redlands. The parcels are required to be merged into a single parcel as a condition of approval prior to the issuance of building permits.

The Policy Plan Land Use Category (LUC) of the site is Limited Industrial (LI). The Zoning designation of the site is East Valley/Special Development (EV/SD) and is within the Airport Safety Review overlay (AR-3). Warehousing is allowed in the SD zone and LI land use categories. There is currently a residential structure and orange grove on the parcels which will be removed to construct the facility.

The IVDA is a Successor Agency, with joint powers authority comprised of the County and the Cities of San Bernardino, Colton and Loma Linda. Formed in 1990, the IVDA is responsible for the development of the non-aviation portion of the San Bernardino International Airport (SBIA), formerly Norton Air Force Base.

PROJECT SITE ANALYSIS:

Site Planning: The site is designated East Valley Area Plan/Special Development (EV/SD) which provides sites for retail sales of items having long-term utility, to individuals and businesses, services, recreation, transportation, communication, utility facilities, public services, and educational facilities, cultural, entertainment, recreational facilities (EV.0240 (2)(A-N)).

The site is currently developed with an orange grove with a non-conforming residential use. It is adjacent to the ODW Logistics storage warehouse and the Redlands Town Center Retail shopping plaza. For adjacent uses, land use categories and zoning see **Table 1** below.

Table 1: *Existing Land Use and Land Use Categories and Zoning*

Location	Existing Land Use	Land Use Category	Zoning
Project Site	Non-Conforming Single-Family Use & Orange Grove	Limited Industrial (LI)	East Valley / Special Development (EV/SD)
North	Storage Warehouse	Limited Industrial (LI)	East Valley / Special Development (EV/SD)
South	Apartment Complex and Commercial Shopping Center	Medium Density Residential (MDR) and Commercial (C)	East Valley / Special Development (EV/SD)
East	Commercial Shopping Center	Commercial (C)	East Valley / Special Development (EV/SD)
West	Storage Warehouse	Limited Industrial (LI)	East Valley / Special Development (EV/SD)

Development Code Compliance Summary: As noted above, the project satisfies all applicable standards of the East Valley Area Plan / Special Development (EV/SD) zoning district, as illustrated in the following table. *See* **Table 2 *Project Code Compliance, EV.0240***

Table 2 *Project Code Compliance East Valley/Special Development (EV/SD)*			
Project Component	**East Valley Area Plan**		**Project Plans**
Almond Avenue Warehouse	CUP		CUP
Building Setbacks	Front: Street Side Side Interior: Rear	25’ 25’ 20’ 20’	25’ N/A 185’ / 124’ 40’
Parking	1/1000 sf up to 40,000 sf = 40 1/4000 sf additional sf = 41 1/250 sf office = 24 105 total spaces		160 spaces provided including 6 ADA spaces and 24 truck bays
Lot Coverage	85%		85%
Maximum Floor Area Ratio (FAR)	.80:1		.50:1
Maximum Height	No maximum building height is established. Height limits shall be determined in accordance with Part 77 of the FAA regulations.		51’
Landscape Area	The larger of 15% or 1,000 sf.		10% with 5% credit for public art provision per East Valley Area Plan.

Walls/Fencing: There is an existing 6’ concrete screen wall on the east boundary and southeast boundary of the site. A 6’ concrete screen wall is proposed on the remainder of the south boundary and the west boundary of the parcel.

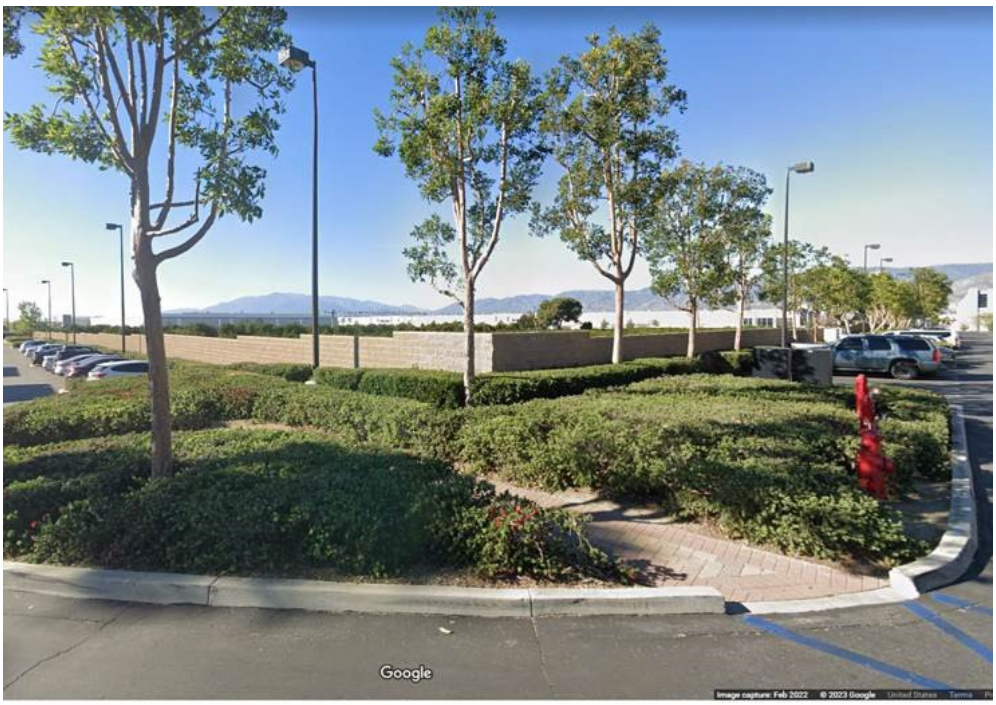

Figure 9 Existing Concrete Screen Wall on east and southeast Boundaries

Hazardous Waste: Any business or facility that handles a hazardous material in quantities at or exceeding 55 gallons, 500 pounds, or 200 cubic feet (compressed gas) at any one time or generates any amount of hazardous waste must obtain hazardous material permits, from the San Bernardino County Fire Protection District, Office of the Fire Marshal, Hazardous Materials Division, as required in the Conditions of Approval (Exhibit A).

Water and Sewer Service: Water and sewer service will be provided by the City of Redlands pursuant to the will serve letter provided, dated July 6, 2022.

Signs: Any proposed signage shall comply with Development Code Chapter 83.13 *Sign Regulations.*

Landscaping: A landscaping plan will be provided and will be required to comply with the Landscaping Standards provided in the Development Code, Section 83.10.060, and Table 83-12 "Minimum Landscaped Area", which is 15% or 1,000 square feet whichever is larger. The applicant proposes to provide 10.8% landscaping by utilizing the provision in the East Valley Area Plan - Site Design and Guidelines section EV.0330(l)(5), which states "The landscaped area requirement may be reduced by a maximum of five (5) percentage points where public art is to be displayed in a setting which enhances pedestrian spaces and building architecture. Minimum cost of public art shall be one (1%) percent of the overall cost of the project as stated on the building permit." At the discretion of the Director, in lieu of a public art display, the developer may also make the 1% donation to an agreed upon party when it is not feasible or practical to display art for public view. The applicant has proposed a donation to the San Bernardino County Museum to satisfy this arrangement, which is included in the Conditions of Approval.

Airport Safety: The site is located within the Airport Safety Overlay District 3 (AR3). Accordingly, the Project will be developed in compliance with Section 82.09.060 of the Development Code. As required by Section 82.09.060(f), the Applicant will be required to grant an Avigation Easement to the San Bernardino International Airport. A copy must be submitted to the County before the issuance of building permits, as required in the Conditions of Approval. A draft copy of the Avigation Easement is attached to this staff report as Exhibit B. With the adoption of the Avigation Easement, staff has determined that the Project is consistent with all applicable standards of the AR3 overlay and is consistent with the applicable Airport Comprehensive Land Use Plan.

ENVIRONMENTAL REVIEW:

Planning staff determined that the project proposal would be subject to the California Environmental Quality Act (CEQA) due its size and proposed square footage of new construction. An Initial Study/Mitigated Negative Declaration (MND) and Mitigation Monitoring and Reporting Program (MMRP) was prepared by Lilburn Corporation, dated November 2022 and made available for public comment during a 30-day review period which began on December 9, 2022 and closed on January 10, 2023. It was determined that any resulting impacts to the environment or the public can be mitigated to a level of less than significant as outlined in the MND. The MND and MMRP are included in this report as Exhibits C and D.

A comment letter was received on January 10, 2023 from Blum Collins & Ho, LLP on behalf of the Golden State Environmental Justice Alliance (GSEJA), claiming that several resources had been inadequately analyzed in the MND. Subsequently on February 7, 2023, staff received a letter from the GSEJA withdrawing its letter and opposition to the Project (Exhibit E).

AB 52 Consultation

Project notification and consultation request pursuant to AB 52 was sent on September 1, 2022 to the following Tribes with ancestral interest in the subject property or who have specifically requested they be notified of new project proposals in the County; Twenty-Nine Palms Band of Mission Indians, Gabrieleno Band of Mission Indians-Kizh Nation, Morongo Band of Mission Indians, San Gabriel Band of Mission Indians, and the San Manuel Band of Mission Indians. The Gabrieleno-Kizh Nation requested consultation which took place on November 3, 2022. The San Manuel Band of Mission Indians responded to the consultation request but did not request formal consultation. Both tribes provided mitigation measures specific to their individual tribes that was incorporated into the Initial Study

prepared for this project and are included as conditions in the final Conditions of Approval. No other tribes responded to the consultation notification.

PUBLIC NOTICE:

Project Notices were circulated to surrounding property owners within 300 feet of the project boundaries on 8/30/2022. In response, an email comment was received from Mitchell Tsai Law asking for information on the Project and the planning process. There was a request to add several members of the firm to the email list for future updates and notices. Status update request emails were received throughout the application process and responses were returned promptly.

One other individual sent an email comment asking to be notified of the status of the Project, environmental process and request for all noticing associated with the Project, CEQA review and public hearing. This email also contained a list of additional individuals that wished to be included in all correspondence and noticing. All requests were responded to promptly and all notices were sent as requested.

The County Planning Division sent out the Notice of Hearing (NOH) on March 8, 2023, advertising the Planning Commission Hearing to be held on March 23, 2023. The NOH was circulated to surrounding property owners within 300 feet of the project boundaries.

The NOH was published in the Sun Newspaper on March 12, 2023, meeting the 10-day prior to hearing requirement.

RECOMMENDATION: That the Planning Commission:

1. **ADOPT** the Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program (EXHIBIT B and C);
2. **ADOPT** the Findings as contained in the staff report (EXHIBIT F);
3. **APPROVE** the Conditional Use Permit for the construction and operation of a 208,000 square-foot concrete tilt-up warehouse with 24 dock doors and including 6,000 sf of office area on 9.55 acres subject to the recommended Conditions of Approval (Exhibit A); and
4. **DIRECT** staff to file the Notice of Determination (Exhibit G).

ATTACHMENTS:

EXHIBIT A: Conditions of Approval
EXHIBIT B: Avigation Easement
EXHIBIT C: Initial Study/Mitigated Negative Declaration
www.sbcounty.gov/Uploads/LUS/Valley/AlmondAveWarehouse/Almond%20Ave%20Warehouse%20Draft%20Initial%20Study.pdf
EXHIBIT D: Mitigation Monitoring and Reporting Program
EXHIBIT E: Public Comments
EXHIBIT F: Findings
EXHIBIT G: Notice of Determination
EXHIBIT H: Site Plan

EXHIBIT A

Conditions of Approval

CONDITIONS OF APPROVAL

Almond Avenue Warehouse
Conditional Use Permit

GENERAL REQUIREMENTS

Ongoing and Operational Conditions

LAND USE SERVICES DEPARTMENT– Planning Division (909) 387-8311

1. Project Approval Description. A Conditional Use Permit for the construction and operation of a 208,000-sf concrete tilt-up warehouse with 24 dock doors and including 6,000 sq. ft. of office area on approximately 9.55 acres on the south side of Almond Avenue in the Community of Redlands in unincorporated San Bernardino County.

   This CUP is approved in compliance with the San Bernardino County Code (SBCC), California Building Codes (CBC), the San Bernardino County Fire Code (SBCFC), the following Conditions of Approval, the approved site plan, and all other required and approved reports and displays (e.g., elevations).

   The developer shall provide a copy of the approved conditions and the approved site plan to every current and future project tenant, lessee, and property owner to facilitate compliance with these Conditions of Approval and continuous use requirements for the Project Site with APN: 0292-055-03, 0292-055-04, Project No. PROJ-2022-00117.

2. Project Location. The project is located at 77 Almond Avenue between Alabama Street, and Nevada Street in the community of Redlands.

3. Revisions. Any proposed change to the approved use/activity on the site or any increase in the developed area of the site or any expansion or modification to the approved facilities, including changes to the height, location, bulk or size of structure or equipment shall require an additional land use review and application subject to approval by the County. The developer shall prepare, submit with fees and obtain approval of the application prior to implementing any such revision or modification. (SBCC §86.06.070)

4. Indemnification. In compliance with SBCC §81.01.070, the developer shall agree, to defend, indemnify, and hold harmless the County or its "indemnitees" (herein collectively the County's elected officials, appointed officials (including Planning Commissioners), Zoning Administrator, agents, officers, employees, volunteers, advisory agencies or committees, appeal boards or legislative body) from any claim, action, or proceeding against the County or its indemnitees to attack, set aside, void, or annul an approval of the County by an indemnitee concerning a map or permit or any other action relating to or arising out of County approval, including the acts, errors or omissions of any person and for any costs or expenses incurred by the indemnitees on account of any claim, except where such indemnification is prohibited by law. In the alternative, the developer may agree to relinquish such approval.

   Any condition of approval imposed in compliance with the County Development Code or County General Plan shall include a requirement that the County acts reasonably to promptly notify the developer of any claim, action, or proceeding and that the County cooperates fully in the defense. The developer shall reimburse the County and its indemnitees for all expenses resulting from such actions, including any court costs and attorney fees, which the County or its indemnitees may be required by a court to pay as a result of such action.

   The County may, at its sole discretion, participate at its own expense in the defense of any such action, but such participation shall not relieve the developer of their obligations under this condition to reimburse the County or its indemnitees for all such expenses. This indemnification provision shall apply regardless of the existence or degree of fault of indemnitees.

   The developer's indemnification obligation applies to the indemnitees' "passive" negligence but does not apply to the indemnitees' "sole" or "active" negligence or "willful misconduct" within the meaning of Civil Code Section 2782.

5. Expiration. This project permit approval shall expire and become void if it is not "exercised" within three (3) years of the effective date of this approval, unless an extension of time is approved. The permit is deemed "exercised" when either:

a. The permittee has commenced actual construction or alteration under a validly issued building permit, or
b. The permittee has substantially commenced the approved land use or activity on the project site, for those portions of the project not requiring a building permit. (SBCC §86.06.060)
c. Occupancy of approved land use occupancy of completed structures and operation of the approved and exercised land use remains valid continuously for the life of the project and the approval runs with the land, unless one of the following occurs:
   - Construction permits for all or part of the project are not issued, or the construction permits expire before the structure is completed and the final inspection is approved.
   - The land use is determined by the County to be abandoned or non-conforming.
   - The land use is determined by the County to be not operating in compliance with these conditions of approval, the County Code, or other applicable laws, ordinances or regulations. In these cases, the land use may be subject to a revocation hearing and possible termination.

PLEASE NOTE: This will be the ONLY notice given of this approval's expiration date. The developer is responsible to initiate any Extension of Time application.

6. Continuous Effect/Revocation. All of the conditions of this project approval are continuously in effect throughout the operative life of the project for all approved structures and approved land uses/activities. Failure of the property owner or developer to comply with any or all of the conditions at any time may result in a public hearing and possible revocation of the approved land use, provided adequate notice, time and opportunity is provided to the property owner, developer or other interested party to correct the non-complying situation.

7. Extension of Time. Extensions of time to the expiration date (listed above or as otherwise extended) may be granted in increments each not to exceed an additional three years beyond the current expiration date. An application to request consideration of an extension of time may be filed with the appropriate fees no less than thirty days before the expiration date. Extensions of time may be granted based on a review of the application, which includes a justification of the delay in construction and a plan of action for completion. The granting of such an extension request is a discretionary action that may be subject to additional or revised conditions of approval or site plan modifications. (SBCC §86.06.060)

8. Project Account. The Project account number is PROJ-2022-00117. This is an actual cost project with a deposit account to which hourly charges are assessed by various county agency staff (e.g., Land Use Services, Public Works, and County Counsel). Upon notice, the developer shall deposit additional funds to maintain or return the account to a positive balance. The developer is responsible for all expense charged to this account. Processing of the project shall cease, if it is determined that the account has a negative balance and that an additional deposit has not been made in a timely manner. A minimum balance of $1,000.00 must be in the project account at the time the Condition Compliance Review is initiated. Sufficient funds must remain in the account to cover the charges during each compliance review. All fees required for processing shall be paid in full prior to final inspection, occupancy and operation of the approved use.

9. Condition Compliance: In order to obtain construction permits for grading, building, final inspection and/or tenant occupancy for each approved building, the developer shall process a Condition Compliance Release Form (CCRF) for each respective building and/or phase of the development through the Planning Division in accordance with the directions stated in the Approval letter. The Planning Division shall release their holds on each phase of development by providing to County Building and Safety the following:

   - Grading Permits: a copy of the signed CCRF for grading/land disturbance.
   - Building Permits: a copy of the signed CCRF for building permits.
   - Final Occupancy: a copy of the signed CCRF for final inspection of each respective building or use of the land, after an on-site compliance inspection by the Planning Division.

10. Development Impact Fees. Additional fees may be required prior to issuance of development permits. Fees shall be paid as specified in adopted fee ordinances.

11. Additional Permits. The developer shall ascertain compliance with all laws, ordinances, regulations and any other requirements of Federal, State, County and Local agencies that may apply for the development and operation of the approved land use. These may include but not limited to:

a) FEDERAL: N/A;
b) STATE: Santa Ana RWQCB, South Coast AQMD, California Department of Fish and Wildlife
c) COUNTY: Land Use Services – Building and Safety/Code Enforcement/Land Development, County Fire/HazMat; Public Health – Environmental Health Services, Public Works –Traffic/ County Surveyor, and
d) LOCAL: N/A

12. Continuous Maintenance. The Project property owner shall continually maintain the property so that it is visually attractive and not dangerous to the health, safety and general welfare of both on-site users (e.g. employees) and surrounding properties. The property owner shall ensure that all facets of the development are regularly inspected, maintained and that any defects are timely repaired. Among the elements to be maintained, include but are not limited to:

    a) Annual maintenance and repair: The developer shall conduct inspections for any structures, fencing/walls, driveways, and signs to assure proper structural, electrical, and mechanical safety.
    b) Graffiti and debris: The developer shall remove graffiti and debris immediately through weekly maintenance.
    c) Landscaping: The developer shall maintain landscaping in a continual healthy thriving manner at proper height for required screening. Drought-resistant, fire-retardant vegetation shall be used where practicable. Where landscaped areas are irrigated it shall be done in a manner designed to conserve water, minimizing aerial spraying.
    d) Dust control: The developer shall maintain dust control measures on any undeveloped areas where landscaping has not been provided.
    e) Erosion control: The developer shall maintain erosion control measures to reduce water runoff, siltation, and promote slope stability.
    f) External Storage: The developer shall maintain external storage, loading, recycling and trash storage areas in a neat and orderly manner, and fully screened from public view. Outside storage shall not exceed the height of the screening walls.
    g) Metal Storage Containers: The developer shall NOT place metal storage containers in loading areas or other areas unless specifically approved by this or subsequent land use approvals.
    h) Screening: The developer shall maintain screening that is visually attractive. All trash areas, loading areas, mechanical equipment (including roof top) shall be screened from public view.
    i) Signage: The developer shall maintain all on-site signs, including posted area signs (e.g. “No Trespassing”) in a clean readable condition at all times. The developer shall remove all graffiti and repair vandalism on a regular basis. Signs on the site shall be of the size and general location as shown on the approved site plan or subsequently a County-approved sign plan.
    j) Lighting: The developer shall maintain any lighting so that they operate properly for safety purposes and do not project onto adjoining properties or roadways. Lighting shall adhere to applicable glare and night light rules.
    k) Parking and on-site circulation: The developer shall maintain all parking and on-site circulation requirements, including surfaces, all markings and traffic/directional signs in an un-faded condition as identified on the approved site plan. Any modification to parking and access layout requires the Planning Division review and approval. The markings and signs shall be clearly defined, un-faded and legible; these include parking spaces, disabled space and access path of travel, directional designations, and signs, stop signs, pedestrian crossing, speed humps and “No Parking”, “Carpool”, and “Fire Lane” designations.
    l) Fire Lanes: The developer shall clearly define and maintain in good condition at all times all markings required by the Fire Department, including “No Parking" designations and “Fire Lane” designations.

13. Performance Standards. The approved land uses shall operate in compliance with the general performance standards listed in the County Development Code Chapter 83.01, regarding air quality, electrical disturbance, fire hazards (storage of flammable or other hazardous materials), heat, noise, vibration, and the disposal of liquid waste.

14. Lighting. All lighting shall be limited to that necessary for maintenance activities and security purposes. This is to allow minimum obstruction of night sky remote area views. No light shall project onto adjacent roadways in a manner that interferes with on-coming traffic. All signs proposed by this project shall only be lit by steady, stationary, shielded light directed at the sign, by light inside the sign, by direct stationary neon lighting or in the

case of an approved electronic message center sign, an alternating message no more than once every five seconds.

15. Clear Sight Triangle. Adequate visibility for vehicular and pedestrian traffic shall be provided at clear sight triangles at all 90-degree angle intersections of public rights-of-way and private driveways. All signs, structures and landscaping located within any clear sight triangle shall comply with the height and location requirements specified by County Development Code (SBCC§ 83.02.030) or as otherwise required by County Traffic.

16. Underground Utilities. No new above-ground power or communication lines shall be extended to the site. All required utilities shall be placed underground in a manner that complies with the California Public Utilities Commission General Order 128 and avoids disturbing any existing/natural vegetation or the site appearance. Existing utilities around the site perimeter shall also be placed underground, in coordination with the utility provider.

17. Construction Hours. Construction will be limited to the hours of 7:00 a.m. to 7:00 p.m., Monday through Saturday in accordance with the County of San Bernardino Development Code standards. No construction activities are permitted outside of these hours or on Sundays and Federal holidays.

18. Construction Noise. The following measures shall be adhered to during the construction phase of the project:

    - All construction equipment shall be muffled in accordance with manufacturer's specifications.
    - All construction staging shall be performed as far as possible from occupied dwellings. The location of staging areas shall be subject to review and approval by the County prior to the issuance of grading and/or building permits.
    - All stationary construction equipment shall be placed in a manner so that emitted noise is directed away from sensitive receptors (e.g., residences and schools) nearest the project site.

19. Diesel Regulations. The operator shall comply with all existing and future California Air Resources Board and South Coast Air Quality Management District regulations related to diesel-fueled trucks, which among others may include: (1) meeting more stringent emission standards; (2) retrofitting existing engines with particulate traps; (3) use of low sulfur fuel; and (4) use of alternative fuels or equipment. Air Quality Management District rules for diesel emissions from equipment and trucks are embedded in the compliance for all diesel fueled engines, trucks, and equipment with the statewide California Air Resources Board Diesel Reduction Plan. These measures will be implemented by the California Air Resources Board in phases with new rules imposed on existing and new diesel-fueled engines.

LAND USE SERVICES DEPARTMENT– Code Enforcement Division (909) 387-8311

20. Enforcement. If any County enforcement activities are required to enforce compliance with the conditions of approval, the property owner and "developer" shall be charged for such enforcement activities in accordance with the County Code Schedule of Fees. Failure to comply with these conditions of approval or the approved site plan design required for this project approval shall be enforceable against the property owner and "developer" (by both criminal and civil procedures) as provided by the San Bernardino County Code, Title 8 – Development Code; Division 6 – Administration, Chapter 86.09 – Enforcement.

21. Weed Abatement. The applicant shall comply with San Bernardino County weed abatement regulations and periodically clear the site of all non-complying vegetation. This includes removal of all Russian thistle (tumbleweeds).

LAND USE SERVICES DEPARTMENT – Land Development Division – Drainage Section (909) 387-8311

22. Tributary Drainage. Adequate provisions should be made to intercept and conduct the tributary off-site and on-site 100-year drainage flows around and through the site in a manner that will not adversely affect adjacent or downstream properties at the time the site is developed.

23. Additional Drainage Requirements. In addition to drainage requirements stated herein, other "on-site" and/or "off-site" improvements may be required which cannot be determined from tentative plans at this time and would have to be reviewed after more complete improvement plans and profiles have been submitted to this office.

24. Erosion Control Installation. Erosion control devices must be installed and maintained at all perimeter openings and slopes throughout the construction of the project. No sediment is to leave the job site.

25. BMP Enforcement. In the event the property owner/"developer" (including any successors or assigns) fails to accomplish the necessary BMP maintenance within five (5) days of being given written notice by the County Department of Public Works, then the County shall cause any required maintenance to be done. The entire cost and expense of the required maintenance shall be charged to the property owner and/or "developer", including administrative costs, attorney's fees, and interest thereon at the rate authorized by the County Code from the date of the original notice to the date the expense is paid in full.

26. Continuous BMP Maintenance. The property owner/"developer" is required to provide periodic and continuous maintenance of all Best Management Practices (BMP) devices/facilities listed in the County approved final Water Quality Management Plan (WQMP) for the project. Refer to approved WQMP maintenance section.

PUBLIC HEALTH - Environmental Health Services (800) 442-2283

27. Noise Levels. Noise level shall be maintained at or below County Standards, Development Code Section 83.01.080. For information, please call DEHS at 1-800-442-2283.

28. Refuse Storage and Disposal. All refuse generated at the premises shall at all times be stored in approved containers and shall be placed in a manner so that environmental public health nuisances are minimized. All refuse not containing garbage shall be removed from the premises at least one (1) time per week, or as often as necessary to minimize public health nuisances. Refuse containing garbage shall be removed from the premises at least two (2) times per week, or as often if necessary, to minimize public health nuisances, by a permitted hauler to an approved solid waste facility in conformance with San Bernardino County Code Chapter 8, Section 33.0830 et. seq. For information, please call DEHS/LEA at: 1-800-442-2283.

29. OWTS Maintenance. The onsite wastewater treatment system shall be maintained so as not to create a public nuisance and shall be serviced by an EHS approved permitted pumper.

COUNTY FIRE DEPARTMENT–Community Safety Division (760)995-8190

30. Additional Requirements: In addition to the Fire requirements stated herein, other onsite and offsite improvements may be required which cannot be determined from tentative plans at this time and would have to be reviewed after more complete improvement plans and profiles have been submitted to this office. 1. A looped Fire Under Ground water system will be required 2. A deferred submittal will be required for Spinklers, Alarms and Underground Fire Water, High Pile Storage, pump house. 3. A Fire Control Room will be required 4. See Redlands Fire Department Fire protection Guideline Buildings over 50,000 sq. ft # FG-103

31. Access – 150+ feet: Roadways exceeding one hundred fifty (150) feet in length shall be approved by the Fire Department. These shall be extended to within one hundred fifty (150) feet of and shall give reasonable access to all portions of the exterior walls of the first story of any building.

32. Jurisdiction: The above referenced project is under the jurisdiction of the San Bernardino County Fire Department herein "Fire Department". Prior to any construction occurring on any parcel, the applicant shall contact the Fire Department for verification of current fire protection requirements. All new construction shall comply with the current California Fire Code requirements and all applicable status, codes, ordinances and standards of the Fire Department.

33. Sprinkler Installation Letter: The applicant shall submit a letter to the Fire Department agreeing and committing to installation of a fire protection system prior to the building inspection for drywall and insulation.

34. Standard F-5 DESIGN, INSTALLATION AND MAINTENANCE OF FIRE ALARM SYSTEMS: This standard applies to all new installations and modifications of existing fire alarm systems, within new construction as well as building additions and tenant improvements within existing buildings. This standard and its interpretation is not intended to be applied or enforced where there is any conflict with NFPA 72 or the California Fire Code.

35. Standard B-1 PREMISE AND BUILDING IDENTIFICATION AND ADDRESSING: This standard applies to the marking of all buildings with address numbers for identification.

36. Standard B-2 CONSTRUCTION SITE FIRE SAFETY: This standard establishes minimum requirements for fire safety during construction and demolition. This document shall not be construed to be in lieu of any other applicable State or Federal law or regulation related to construction site safety. The general contractor or other designee of the building owner shall be responsible for compliance with these standards.

37. Standard A-3 GATES AND OTHER OBSTRUCTIONS TO FIRE DEPARTMENT ACCESS: This standard shall apply to all obstructions, access control devices, traffic calming devices, or other similar systems within any roadways that serve as fire access in all new or existing residential, commercial, and industrial development. This standard does not apply to obstructions within parking aisles that do not serve as fire apparatus access roads.

38. Standard S-1 HIGH PILE STORAGE/WAREHOUSE BUILDINGS: This standard shall apply to all storage occupancies designated as High Pile Storage as defined by the current California Fire Code (CFC), Chapter 32, the San Bernardino County Fire Code and Standards, and any other nationally applicable standards.

39. Standard F-4 POST INDICATOR VALVES AND FIRE DEPARTMENT CONNECTIONS: This standard, in conjunction with the latest edition of NFPA 13, NFPA 13R and NFPA 24, shall apply to the design and installation of, and the modification to, all new and existing fire sprinkler systems in commercial and industrial buildings and multi-family dwellings. This standard and its interpretation shall take NOT precedent where there is any conflict with NFPA standards.

40. Standard F-1 FIRE SPRINKLER SYSTEMS IN COMMERCIAL AND INDUSTRIAL BUILDINGS: This standard, in conjunction with the latest edition of NFPA 13, shall apply to the design and installation of, and the modification to, all fire sprinkler systems in commercial and industrial occupancies. This standard and its interpretation is not intended to be applied or enforced where there is any conflict with NFPA 13 or the California Fire Code.

DEPARTMENT OF PUBLIC WORKS – Solid Waste Management – (909) 386-8701

41. Franchise Hauler Service Area. This project falls within a County Franchise Area. If subscribing for the collection and removal of construction and demolition waste from the project site, all developers, contractors, and subcontractors shall be required to receive services through the grantee holding a franchise agreement in the corresponding County Franchise Area (Burrtec Waste Industries).

42. Recycling Storage Capacity. The developer shall provide adequate space and storage bins for both refuse and recycling materials. This requirement is to assist the County in compliance with the recycling requirements of Assembly Bill (AB) 2176.

43. Mandatory Commercial Recycling. Beginning July 1, 2012 all businesses defined to include a commercial or public entity that generates 4 or more cubic yards of commercial waste a week or is a multi-family residential dwelling of 5 units or more to arrange for recycling services. The County is required to monitor commercial recycling and will require businesses to provide recycling information. This requirement is to assist the County in compliance with AB 341.

44. Mandatory Commercial Organics Recycling. As of January 1, 2017, AB 1826 (Enacted October 2014) requires businesses that generate four (4) cubic yards of organic waste per week to recycle. A business generating organic waste shall arrange for the recycling services in a manner that is consistent with state and local laws and requirements, including a local ordinance or local jurisdiction's franchise agreement, applicable to the collection, handling, or recycling of solid and organic waste or arrange for separate organic waste collection and recycling services, until the local ordinance or local jurisdiction's franchise agreement includes organic waste recycling services. A business that is a property owner may require a lessee or tenant of that property to source separate their organic waste to aid in compliance. **Additionally, all businesses that contract for gardening or landscaping services must stipulate that the contractor recycle the resulting gardening or landscaping waste.** Residential multifamily dwellings of five (5) or more units are required to recycle organics; however, they are not required to arrange for recycling services specifically for food waste. Applicant will be required to report to the County on efforts to recycle organics materials once operational.

45. Recycling and Organic Waste Collection Container Information – As of July 1, 2020, AB 827 (Enacted October 2, 2019) requires those MCR and MORe-covered businesses that sell products meant for immediate

consumption and currently provide trash collection containers for their customers to provide recycling and/or organics collection containers adjacent to trash containers at front-of-house, except in restrooms. Full-service restaurants are exempt from these requirements as long as they provide containers for employees to separate post-consumer recyclables and organic waste purchased on the premise for customers.

DEPARTMENT OF PUBLIC WORKS – Traffic Division – (909) 387-8186

46. Project vehicles shall not back out into the public roadway.
47. Single Tenant Occupancy. The site shall operate based on a single tenant to remain consistent with established traffic impacts. If, at any time, multiple tenants occupy and/or operate on the proposed site, the project shall no longer be considered to meet the definition of "High Cube" and a revised traffic study shall be conducted using the current Highway Capacity Manual methodology and the current ITE trip generation for "Warehouse". The project will be subject to any increased mitigation measures including but not limited to direct impacts, fair share contributions, and Regional Transportation Fees.
48. Access. The access point to the facility shall remain unobstructed at all times, except a driveway access gate which may be closed after normal working hours.

PRIOR TO ISSUANCE OF GRADING PERMITS
OR LAND DISTURBING ACTIVITIES
The Following Shall Be Completed

LAND USE SERVICES DEPARTMENT– Planning Division (909) 387-8311

49. Mitigation Measures: Please see Mitigation Monitoring and Reporting Program (MMRP attached) for mitigation measures to be completed prior to grading permit issuance.
50. GHG-1 GHG Emissions Screening Tables: Prior to the approval of grading permits, the project applicant shall demonstrate that it would implement a minimum of 100 points of GHG reduction measures listed in the County's GHG Emissions Screening Tables. Per County standards, projects that exceed 3,000 MT CO2e and implement a minimum of 100 points would be consistent with the County's GHG Plan and would therefore result in a less than significant impact.

LAND USE SERVICES DEPARTMENT – Building and Safety Division (909) 387-8311

51. Wall Plans: Submit plans and obtain separate building permits for any required walls or retaining walls.
52. Geotechnical (Soil) Report: A geotechnical (soil) report shall be submitted to the Building and Safety Division for review and approval prior to issuance of grading permits.
53. Demolition Permit: Obtain a demolition permit for any building/s or structures to be demolished. Underground structures must be broken in, backfilled and inspected before covering.

LAND USE SERVICES DEPARTMENT – Land Development Division – Drainage Section (909) 387-8311

54. Drainage Improvements. A Registered Civil Engineer (RCE) shall investigate and design adequate drainage improvements to intercept and conduct the off-site and on-site 100-year drainage flows around and through the site in a safe manner that will not adversely affect adjacent or downstream properties. Submit drainage study for review and obtain approval. A $750 deposit for drainage study review will be collected upon submittal to the Land Development Division. Deposit amounts are subject to change in accordance with the latest approved fee schedule.
55. FEMA Flood Zone. The project is located within Flood Zone X-Unshaded according to FEMA Panel Number 06071C8704H dated 08/28/2008. No elevation requirements. The requirements may change based on the recommendations of a drainage study accepted by the Land Development Division and the most current Flood Map prior to issuance of grading permit.

56. Grading Plans. Grading and erosion control plans shall be prepared in accordance with the County's guidance documents (which can be found here: https://lus.sbcounty.gov/land-development-home/grading-and-erosion-control/) and submitted for review with approval obtained prior to construction. All drainage and WQMP improvements shall be shown on the grading plans according to the approved final drainage study and WQMP reports. Fees for grading plans will be collected upon submittal to the Land Development Division and are determined based on the amounts of cubic yards of cut and fill. Fee amounts are subject to change in accordance with the latest approved fee schedule.

57. NPDES Permit. An NPDES permit - Notice of Intent (NOI) - is required on all grading of one (1) acre or more prior to issuance of a grading/construction permit. Contact your Regional Water Quality Control Board for specifics. www.swrcb.ca.gov

58. Regional Board Permit. Construction projects involving one or more acres must be accompanied by Regional Board permit WDID #. Construction activity includes clearing, grading, or excavation that results in the disturbance of at least one (1) acre of land total.

59. On-site Flows. On-site flows need to be directed to the nearest drainage facility unless a drainage acceptance letter is secured from the adjacent property owners and provided to Land Development.

60. WQMP. A completed Water Quality Management Plan (WQMP) shall be submitted for review and approval obtained prior to construction. A $2,650 deposit for WQMP review will be collected upon submittal to the Land Development Division. Deposit amounts are subject to change in accordance with the latest approved fee schedule. Review processed on an actual cost basis. Copies of the WQMP guidance and template can be found at: (https://dpw.sbcounty.gov/wqmp-templates-and-forms/)

61. WQMP Inspection Fee. The developer shall provide a $3,600 deposit to the Department of Public Works for inspection of the approved WQMP. Deposit amounts are subject to change in accordance with the latest approved fee schedule.

DEPARTMENT OF PUBLIC WORKS – Surveyor – (909) 387-8149

62. Survey Monumentation. If any activity on this project will disturb any land survey monumentation, including but not limited to vertical control points (benchmarks), said monumentation shall be located and referenced by or under the direction of a licensed land surveyor or registered civil engineer authorized to practice land surveying prior to commencement of any activity with the potential to disturb said monumentation, and a corner record or record of survey of the references shall be filed with the County Surveyor (Section 8771(b) Business and Professions Code).

    Pursuant to Sections 8762(b) and/or 8773 of the Business and Professions Code, a Record of Survey or Corner Record shall be filed under any of the following circumstances:

    a) Monuments set to mark property lines or corners;

    b) Performance of a field survey to establish property boundary lines for the purposes of construction staking, establishing setback lines, writing legal descriptions, or for boundary establishment/mapping of the subject parcel;

    c) Any other applicable circumstances pursuant to the Business and Professions Code that would necessitate filing of a Record of Survey.

PUBLIC HEALTH – Environmental Health Services (800) 442-2283

63. The project area has a high probability of containing vectors. DEHS Vector Control Section will determine the need for vector survey and any required control programs. A vector clearance letter shall be submitted to DEHS/Land Use. For information, contact Vector Control at 1-800-442-2283.

PRIOR TO ISSUANCE OF BUILDING PERMITS

The Following Shall Be Completed:

LAND USE SERVICES DEPARTMENT – Planning (909) 387-8311

64. Mitigation Measures. Please see Mitigation Monitoring and Reporting Program (MMRP attached) for mitigation measures to be completed prior to building permit issuance.

65. Lot Merger. Merger of parcels 0292-055-03, and 0292-055-04 to create one (1) 9.55 acre parcel shall be filed under separate application.

66. East Valley Area Plan Mitigation AQ/EVAP-SART Mitigation Fee. Prior to issuance of building permits the developer shall contribute a fair share fee of $1435 per net acre to the satisfaction of County Regional Parks for construction of the East Valley Area Plan segment of the Santa Ana River Trail (SART) from California Street to the SH30 bridge. This fee may be waived or adjusted by County Regional Parks based upon inflation and credit may be granted for any developer completed trail improvements. The construction of the trail shall provide an incentive to use alternative transportation modes that access the area. This action assists with air quality mitigation and is also an offset to the aesthetic resource loss caused by removal of the orange groves in the area.

67. Lighting Plans. The developer shall submit for review and approval to County Planning a photometric study demonstrating that the project light does not spill onto the adjacent properties, or public streets. Lighting fixtures shall be oriented and focused to the onsite location intended for illumination (e.g. walkways). Lighting shall be shielded away from adjacent sensitive uses, including the adjacent residential development, to minimize light spillover. The glare from any luminous source, including on-site lighting, shall not exceed 0.5 foot-candle at the property line. This shall be done to the satisfaction of County Planning, in coordination with County Building and Safety.

68. Landscape and Irrigation Plan. Landscape and Irrigation Plans shall be prepared in conformance with Chapter 83.10, Landscaping Standards, of the County Development Code. The developer shall submit four copies of a landscape and irrigation plan to County Planning.

69. Signs. All proposed on-site signs shall be shown on a separate plan, including location, scaled and dimensioned elevations of all signs with lettering type, size, and copy. Scaled and dimensioned elevations of buildings that propose signage shall also be shown. The applicant shall submit sign plans to County Planning for all existing and proposed signs on this site. The applicant shall submit for approval any additions or modifications to the previously approved signs. Pursuant to SBCC Chapter 83.13, *Sign Regulations*, and SBCC §83.07.030, *Glare and Outdoor Lighting Valley Region*, all signs shall comply with the following minimum standards:

    a) Light Trespass Prohibited. Outdoor lighting of commercial or industrial land uses shall be fully shielded to preclude light pollution or light trespass on any of the following:

        1. An abutting residential land use zoning district;
        2. A residential parcel; or
        3. Public right-of-way.

    b) Determination of Light Trespass. A determination of light trespass shall be made through a quantitative measurement utilizing a standard yardstick (3 ft x 1½ in.). The yardstick shall be placed at the building setback line in the complainant's yard. The yardstick shall be in contact with the ground or may be raised to window level of the dwelling and in a vertical position. The person taking the measurement shall then determine if a shadow is cast by the light source, that is, the light source, yardstick, and shadow shall be in alignment. Measurements shall not be taken when there is a moon in the night sky.

    c) Maximum Allowed Foot-Candles. Direct or indirect light from any light fixture shall not cause glare above five-tenths (0.5) foot-candles when measured at the property line of a residential land use zoning district, residential parcel, or public right-of-way. Light levels shall be measured with a photoelectric photometer, following the standard spectral luminous efficiency curve adopted by the International Commission on Illumination.

See MMRP for Mitigation Measures

LAND USE SERVICES DEPARTMENT – Building and Safety (909) 387-8311

70. Construction Plans. Any building, sign, or structure to be constructed or located on site, will require professionally prepared plans based on the most current County and California Building Codes, submitted for review and approval by the Building and Safety Division.

71. Temporary Use Permits: A Temporary Use Permit (T.U.P.) for the office trailer will be required or it must be placed on a permanent foundation per State H.C.D. guidelines. A T.U.P. is only valid for a maximum of five (5) years.

72. Avigation Easement: An Avigation Easement shall be granted to the appropriate airport and recorded prior to the issuance of building permits for all construction in the AR overlay areas. Plans submitted in the AR overlays shall conform to the interior noise levels as per San Bernardino County standards.

LAND USE SERVICES DEPARTMENT – Land Development Division – Road Section (909) 387-8311

73. Road Improvements. The developer shall submit for review and obtain approval from the Land Use Services Department the following plans for the listed required improvements, designed by a Registered Civil Engineer (RCE), licensed in the State of California:

    Almond Avenue (Collector – 66')

    - Road Dedication. An additional 3-foot grant of easement is required to provide a half-width right-of-way of 33 feet.
    - Street Improvements. Design curb and gutter with match up paving __22__ feet from centerline.
    - Sidewalks. Design sidewalks per County Standard 109 Type "C".
    - Driveway Approach. Design driveway approach per San Bernardino County Standard 129B and located per San Bernardino County Standard 130.

74. Road Standards and Design. All required street improvements shall comply with latest San Bernardino County Road Planning and Design Standards and the San Bernardino County Standard Plans. Road sections shall be designed to Valley Road Standards of San Bernardino County, and to the policies and requirements of the County Department of Public Works and in accordance with the General Plan, Circulation Element.

75. Construction Permits. Prior to installation of road and drainage improvements, a construction permit is required from the County Department of Public Works, Permits/Operations Support Division, Transportation Permits Section (909) 387-1863 as well as other agencies prior to work within their jurisdiction. Submittal shall include a materials report and pavement section design in support of the section shown on the plans. Applicant shall conduct classification counts and compute a Traffic Index (TI) Value in support of the pavement section design.

76. Encroachment Permits. Prior to installation of driveways, sidewalks, etc., an encroachment permit is required from the County Department of Public Works, Permits/Operations Support Division, Transportation Permits Section (909) 387-1863 as well as other agencies prior to work within their jurisdiction.

77. Soils Testing. Any grading within the road right-of-way prior to the signing of the improvement plans shall be accomplished under the direction of a soils testing engineer. Compaction tests of embankment construction, trench back fill, and all sub-grades shall be performed at no cost to San Bernardino County and a written report shall be submitted to the Transportation Operations Division, Permits Section of County Public Works, prior to any placement of base materials and/or paving.

78. Slope Easements. Slope rights shall be dedicated where necessary.

79. Street Type Entrance. Street type entrance(s) with curb returns shall be constructed at the entrance(s) to the development.

80. Transitional Improvements. Right-of-way and improvements (including off-site) to transition traffic and drainage flows from proposed to existing, shall be required as necessary.

See MMRP for Mitigation Measures

81. Street Gradients. Road profile grades shall not be less than 0.5% unless the engineer at the time of submittal of the improvement plans provides justification to the satisfaction of County Public Works confirming the adequacy of the grade.

82. Slope Tests. Slope stability tests are required for road cuts or road fills per recommendations of the Geotechnical Engineer to the satisfaction of County Public Works.

83. Regional Transportation Fees. This project falls within the Regional Transportation Development Mitigation Fee Plan Area for the Redlands Donut Hole Subarea. The Regional Transportation Development Mitigation Plan Fee (Plan Fee) shall be paid to the Land Use Services Department. The Plan Fee shall be computed in accordance with the Plan Fee Schedule in effect as of the date that the building plans are submitted, and the building permit is applied for. The Plan Fee is subject to change periodically. Currently, the fee is $2.41 per square foot for Industrial Use, which includes the 208,000 square foot industrial warehouse per the site plan dated July 7, 2022.

    Therefore, the estimated Regional Transportation Fees for the Project is $501,280.00. The current Regional Transportation Development Mitigation Plan can be found at the following website: https://www.sbcounty.gov/uploads/DPW/docs/Fee-Schedule-Regional-Plan.pdf

84. Utilities. Final plans and profiles shall indicate the location of any existing utility facility or utility pole which would affect construction, and any such utility shall be relocated as necessary without cost to the County.

COUNTY FIRE DEPARTMENT – Community Safety Division (760) 995-8190

85. Primary Access Paved: Prior to building permits being issued to any new structure, the primary access road shall be paved or an all-weather surface and shall be installed as specified in the General Requirement conditions, including width, vertical clearance and turnouts.

86. Secondary Access Paved: Prior to building permits being issued to any new structure, the secondary access road shall be paved or an all-weather surface and shall be installed as specified in the General Requirement conditions including width, vertical clearance and turnouts.

87. Access. The development shall have a minimum of two (2) points of vehicular access. These are for fire/emergency equipment access and for evacuation routes. Standard 902.2.1

    Single Story Road Access Width:

    All buildings shall have access provided by approved roads, alleys and private drives with a minimum twenty-six (26) foot unobstructed width and vertically to fourteen (14) feet six (6) inches in height. Other recognized standards may be more restrictive by requiring wider access provisions.

    Multi-Story Road Access Width:

    Buildings three (3) stories in height or more shall have a minimum access of thirty (30) feet unobstructed width and vertically to fourteen (14) feet six (6) inches in height. [F41]

88. Solar: Solar / Photovoltaic System Plans. Plans shall be submitted online through EZOP to the Fire Department for review and approval. Plans must be submitted and approved prior to Conditional Compliance Release of Building.

89. Surface: Fire apparatus access roads shall be designed and maintained to support the imposed loads of fire apparatus and shall be surfaced so as to provide all-weather driving capabilities. Road surface shall meet the approval of the Fire Chief prior to installation. All roads shall be designed to 85% compaction and/or paving and hold the weight of Fire Apparatus at a minimum of 80K pounds.

90. Water System: Prior to any land disturbance, the water systems shall be designed to meet the required fire flow for this development and shall be approved by the Fire Department. The required fire flow shall be determined by using California Fire Code. The Fire Flow for this project shall be: __4000_____ GPM for a ___4___hour duration at 20 psi residual operating pressure. Fire Flow is based on a ____208,000____ sq.ft. structure.

91. Water System Certification: The applicant shall provide the Fire Department with a letter from the serving water company, certifying that the required water improvements have been made or that the existing fire hydrants and

water system will meet distance and fire flow requirements. Fire flow water supply shall be in place prior to placing combustible materials on the job site.

92. Building Plans: Building plans shall be submitted to the Fire Department for review and approval.

93. Combustible Protection: Prior to combustibles being placed on the project site an approved all-weather fire apparatus access surface and operable fire hydrants with acceptable fire flow shall be installed. The topcoat of asphalt does not have to be installed until final inspection and occupancy.

94. Haz-Mat Approval: The applicant shall contact the San Bernardino County Fire Department/Hazardous Materials Division (909) 386-8401 for review and approval of building plans, where the planned use of such buildings will or may use hazardous materials or generate hazardous waste materials.

DEPARTMENT OF PUBLIC WORKS – Solid Waste Management – (909) 386-8701

95. Construction and Demolition Waste Management Plan (CWMP) Part 1 – The developer shall prepare, submit, and obtain approval from SWMD of a CDWMP Part 1 for each phase of the project. The CWMP shall list the types and weights of solid waste materials expected to be generated from construction. The CWMP shall include options to divert waste materials from landfill disposal, materials for reuse or recycling by a minimum of 65% of total weight or volume. More information can be found on the San Bernardino County Solid Waste Management Division (SWMD) website at https://dpw.sbcounty.gov/solid-waste-management/construction-waste-management/. An approved CDWMP Part 1 is required before a permit can be issued. There is a one-time fee of $150.00 for residential projects/$530.00 for commercial/non-residential projects.

PUBLIC HEALTH – Environmental Health Services (800) 442-2283

96. Water Purveyor. Water purveyor shall be **City of Redlands** or EHS approved.

97. Water Service Verification Letter. Applicant shall procure a verification letter from the water service provider. This letter shall state whether or not water connection and service shall be made available to the project by the water provider. This letter shall reference the File Index Number and Assessor's Parcel Number(s). For projects with current active water connections, a copy of water bill with project address may suffice.

98. Water and Sewer - LAFCO: Water and/or Sewer Service Provider Verification. Please provide verification that the parcel(s) associated with the project is/are within the jurisdiction of the water and/or sewer service provider. If the parcel(s) associated with the project is/are not within the boundaries of the water and/or sewer service provider, submit to EHS verification of Local Agency Formation Commission (LAFCO) approval of either: 1. Annexation of parcels into the jurisdiction of the water and/or sewer service provider; or, 2. Out-of-agency service agreement for service outside a water and/or sewer service provider's boundaries. Such agreement/contract is required to be reviewed and authorized by LAFCO pursuant to the provisions of Government Code Section 56133.

99. Existing OWTS: Existing onsite wastewater treatment system can be used if applicant provides an EHS approved certification that indicates the system functions properly, meets code, has the capacity required for the proposed project, and meets LAMP requirements.

100. New OWTS: If sewer connection and/or service are unavailable, onsite wastewater treatment system(s) may then be allowed under the following conditions: a. A soil percolation report shall be submitted to EHS for review and approval. For information, please contact the Wastewater Section at (800) 442-2283. b. An Alternative Treatment System, if applicable, shall be required.

101. Sewer Service Verification Letter: Applicant shall procure a verification letter from the sewer service provider identified. This letter shall state whether or not sewer connection and service shall be made available to the project by the sewer provider. The letter shall reference the Assessor's Parcel Number(s).

102. Sewage Disposal: Method of sewage disposal shall be sewer service provided by City of Redlands or an EHS approved onsite wastewater treatment system (OWTS) that conforms to the Local Agency Management Program (LAMP).

See MMRP for Mitigation Measures

103. Existing Wells. If wells are found on-site, evidence shall be provided that all wells are: (1) properly destroyed, by an approved C57 contractor and under permit from the County OR (2) constructed to EHS standards, properly sealed and certified as inactive OR (3) constructed to EHS standards and meet the quality standards for the proposed use of the water (industrial and/or domestic). Evidence, such as a well certification, shall be submitted to EHS for approval.

104. Individual Wells: If an approved water company cannot serve the project, individual wells are authorized for each daughter parcel providing that County Development Code infrastructure requirements can be met. Conceptual plans, showing that wells and septic system locations meet setback requirements, may be required (§ 83.09.060). If wells are approved, the following notes shall be placed on the Composite Development Plan (CDP), "An individual well shall be utilized as the domestic water source for each lot. The well shall be installed and approved by EHS prior to the issuance of building permits for each lot."

105. Preliminary Acoustical Information. Submit preliminary acoustical information demonstrating that the proposed project maintains noise levels at or below San Bernardino County Noise Standard(s), San Bernardino Development Code Section 83.01.080. The purpose is to evaluate potential future on-site and/or adjacent off-site noise sources. If the preliminary information cannot demonstrate compliance to noise standards, a project specific acoustical analysis shall be required. Submit information/analysis to the EHS for review and approval. For information and acoustical checklist, contact EHS at (800) 442-2283.

106. California Regional Water Quality Control Board Clearance: Written clearance shall be obtained from the designated California Regional Water Quality Control Board (listed below) and a copy forwarded to the Division of Environmental Health Services for projects with design flows greater than 10,000 gallons per day. Santa Ana Region, 3737 Main St., Suite 500, Riverside, CA 92501-3339, 951-782-4130.

PRIOR TO FINAL INSPECTION OR OCCUPANCY

The Following Shall Be Completed

LAND USE SERVICES DEPARTMENT – Planning Division (909) 387-8311

107. Mitigation Measures: Please see Mitigation Monitoring and Reporting Program (MMRP attached) for mitigation measures to be completed prior to occupancy permit issuance.

108. Fees Paid. Prior to final inspection by Building and Safety Division and/or issuance of a Certificate of Conditional Use by the Planning Division, the applicant shall pay in full all fees required under actual cost job number PROJ-2022-00117

109. Shield Lights. Any lights used to illuminate the site shall include appropriate fixture lamp types as listed in SBCC

110. Screen Rooftop. All roof top mechanical equipment is to be screened from ground vistas.

111. Landscaping/Irrigation. All landscaping, dust control measures, all fences, etc. as delineated on the approved Landscape Plan shall be installed. The developer shall submit the Landscape Certificate of Completion verification as required in SBCC Section 83.10.100. Supplemental verification should include photographs of the site and installed landscaping.

112. In Lieu Fee: Please provide verification of payment of fee equal to 1% of total valuation of project as indicated on the building permit to the San Bernardino County Museum in lieu of 5% of required landscaping.

113. Installation of Improvements. All required on-site improvements shall be installed per approved plans.

114. GHG – Installation/Implementation Standards. The developer shall submit for review and obtain approval from County Planning of evidence that all applicable GHG performance standards have been installed, implemented properly and that specified performance objectives are being met.

LAND USE SERVICES DEPARTMENT – Land Development Division – Drainage Section (909) 387-8311

115. Drainage Improvements. All required drainage improvements shall be completed by the applicant. The private Registered Civil Engineer (RCE) shall inspect improvements outside the County right-of-way and certify that these improvements have been completed according to the approved plans.

116. WQMP Improvements. All required WQMP improvements shall be completed by the applicant, inspected and approved by County Public Works. An electronic file of the final and approved WQMP shall be submitted to Land Development Division, Drainage Section.

LAND USE SERVICES DEPARTMENT – Land Development Division – Road Section (909) 387-8311

117. LDD Requirements. All LDD requirements shall be completed by the applicant prior to occupancy.

118. Parkway Planting. Trees, irrigation systems, and landscaping required to be installed on public right-of-way shall be approved by County Public Works and Current Planning and shall be maintained by the adjacent property owner or other County-approved entity.

119. Structural Section Testing. A thorough evaluation of the structural road section, to include parkway improvements, from a qualified materials engineer, shall be submitted to County Public Works.

120. Road Improvements. All required on-site and off-site improvements shall be completed by the applicant, inspected and approved by County Public Works.

COUNTY FIRE DEPARTMENT – Community Safety Division (760) 995-8190

121. Inspection by the Fire Department: Permission to occupy or use the building (certificate of Occupancy or shell release) will not be granted until the Fire Department inspects, approves and signs off on the Building and Safety job card for “fire final”

122. Combustible Vegetation: Combustible vegetation shall be removed as follows: a. Where the average slope of the site is less than 15% - Combustible vegetation shall be removed a minimum distance of thirty (30) feet from all structures or to the property line, whichever is less. b. Where the average slope of the site is 15% or greater -Combustible vegetation shall be removed a minimum one hundred (100) feet from all structures or to the property line, whichever is less.

123. Commercial Addressing: Commercial and industrial developments of 100,000 sq. ft or less shall have the street address installed on the building with numbers that are a minimum six (6) inches in height and with a three quarter (3/4) inch stroke. The street address shall be visible from the street. During the hours of darkness, the numbers shall be electrically illuminated (internal or external). Where the building is two hundred (200) feet or more from the roadway, additional non-illuminated contrasting six (6) inch numbers shall be displayed at the property access entrances.

124. Fire Alarm - Automatic: An automatic fire sprinkler monitoring fire alarm system complying with the California Fire Code, NFPA and all applicable codes is required. The applicant shall hire a Fire Department approved fire alarm contractor. The fire alarm contractor shall submit detailed plans to the Fire Department for review and approval. The required fees shall be paid at the time of plan submittal.

125. Fire Lanes: The applicant shall submit a fire lane plan to the Fire Department for review and approval. Fire lane curbs shall be painted red. The "No Parking, Fire Lane" signs shall be installed on public/private roads in accordance with the approved plan.

126. Fire Sprinkler-NFPA #13: An automatic fire sprinkler system complying with NFPA Pamphlet #13 and the Fire Department standards is required. The applicant shall hire a Fire Department approved fire sprinkler contractor. The fire sprinkler contractor shall submit plans to the with hydraulic calculation and manufacturers specification sheets to the Fire Department for approval and approval. The contractor shall submit plans showing type of storage and use with the applicable protection system. The required fees shall be paid at the time of plan submittal.

127. High-Piled Storage: The applicant shall submit an application for high-piled storage (internal storage over 12’ in height), detailed plans and a commodity analysis report to the Fire Department for review and approval. The

applicant shall submit the approved plan to Building and Safety for review with building plans. If the occupancy classification is designated as S-2, commodities to be stored will be limited to products of light hazard classification only. The required fees shall be paid at the time of plan submittal.

128. Hydrant Marking: Blue reflective pavement markers indicating fire hydrant locations shall be installed as specified by the Fire Department. In areas where snow removal occurs or non-paved roads exist, the blue reflective hydrant marker shall be posted on an approved post along the side of the road, no more than three (3) feet from the hydrant and at least six (6) feet high above the adjacent road.

129. Key Box: An approved Fire Department key box is required. In commercial, industrial and multi-family complexes, all swing gates shall have an approved fire department Knox Lock.

130. Material Identification Placards: The applicant shall install Fire Department approved material identification placards on the outside of all buildings and/or storage tanks that store or plan to store hazardous or flammable materials in all locations deemed appropriate by the Fire Department. Additional placards shall be required inside the buildings when chemicals are segregated into separate areas. Any business with an N.F.P.A. 704 rating of 2-3-3 or above shall be required to install an approved key box vault on the premises, which shall contain business access keys and a business plan.

131. Override Switch: Where an automatic electric security gate is used, an approved Fire Department override switch (Knox ®) is required.

132. Roof Certification: A letter from a licensed structural (or truss) engineer shall be submitted with an original wet stamp at time of fire sprinkler plan review, verifying the roof is capable of accepting the point loads imposed on the building by the fire sprinkler system design.

133. Smoke and Heat Removal: Mechanical smoke removal systems shall be provided for building protected by EFSR sprinkler systems as required by the Chief. The mechanical smoke removal systems shall meet the requirements of CFC and SBCOFD Standards.

DEPARTMENT OF PUBLIC WORKS – Solid Waste Management – (909) 386-8701

134. Construction and Demolition Waste Management Plan (CDWMP) Part 2 – The developer shall complete SWMD's CDWMP Part 2 for construction and demolition. The CDWMP Part 2 shall provide evidence to the satisfaction of SWMD that demonstrates that the project has diverted from landfill disposal, material for reuse or recycling by a minimum of 65% of total weight or volume of all construction waste. The developer MUST provide ALL receipts and/or backup documentation for actual disposal/diversion of project waste. More information can be found on the San Bernardino County Solid Waste Management Division (SWMD) website at https://dpw.sbcounty.gov/solid-waste-management/construction-waste-management/.

END OF CONDITIONS

EXHIBIT B

Avigation Easement

WHEN RECORDED MAIL TO:

San Bernardino International Airport Authority
1601 East Third Street
San Bernardino, California 92408

This is to certify that the interest in real property conveyed by this agreement to the San Bernardino International Airport Authority, a joint powers authority, is hereby accepted by order of its governing Commission.

Dated: _____

Secretary/Assistant Secretary of the Commission for the San Bernardino International Airport Authority

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(Space Above For Use By Recorder)

GRANT EASEMENT
(AVIGATION)

FEE EXEMPT UNDER
GOVERNMENT CODE
SECTION 6103

KNOW ALL MEN BY THESE PRESENTS:

That _____, in the County of San Bernardino, State of California, for its heirs, executors, administrators, successors and assigns (hereinafter referred to as "Grantor"), for reasonable consideration, receipt and sufficiency are hereby confessed and acknowledged, hereby grants and conveys unto the San Bernardino International Airport Authority (hereinafter referred to as "Grantee"), a joint powers authority organized and existing under the laws of the State of California, its successors and assigns forever, a perpetual public-use avigation and flight easement and right-of-way for the free and unobstructed passage and flight of aircraft, of the class, size and category operationally compatible with a certified public airport pursuant to 14 CFR Part-139 as set forth by the Federal Aviation Administration ("FAA") with respect to the San Bernardino International Airport (the "Airport") over and above the federally approved Transitional, Horizontal and Approach Surfaces lying within the Airport Influence Area of the San Bernardino International Airport (the "Airspace") of the following described parcel of real property (the "Parcel"), lying, being and situated in the County of San Bernardino, State of California, to wit:

(LEGAL DISCRIPTION)- Assessor Parcel Map No. ____, M. B. __/__-__ Book ____, Page __ Parcel #'s: ____-___-__-____.

The aforesaid easement and right-of-way described in the preceding paragraph includes but is not limited to:

1. For the use and benefit of the public, the easement and continuing right to fly, or cause or permit the flight by any and all persons or aircraft, of the class, size and category as is now or hereinafter may be operationally compatible and commensurate with the requirements for the San Bernardino International Airport, a certified public airport pursuant to 14 CFR Part-139, in, through, across or about any portion of the Airspace hereinabove described; and

2. The easement and right to cause or create, or permit or allow to be caused or created within the Airspace, such noise, dust, turbulence, vibration, illumination, air currents, fumes, fuel consumption, exhaust, smoke and all other effects as may be inherent in the proper operation of aircraft, now known or hereafter used for navigation of or flight in air; and

3. The continuing and perpetual right to clear and keep clear the Airspace of any portions of buildings, structures, or improvements of any and all kinds, and of trees, vegetation, or other objects, including the right to remove or demolish those portions of such buildings, structures, improvements, trees or any other objects which extend into said Airspace and the right to cut to the ground level and remove any trees which extend into said Airspace as of the Effective Date of this Grant Easement and continuing thereafter; and

4. The right to mark and light, or cause or require to be marked or lighted, as obstructions to air navigation, any and all buildings, structures, or other improvements, and trees or other objects now upon which extend into the Airspace; and

5. The right of ingress to, passage within, and egress from said Parcel, solely for the above stated purposes; reserving, however, to the Grantor, during the term of said easement, such use, rights and privileges in said land or real property as may be exercised and enjoyed without interference with or abridgment of the rights hereby granted.

6. In the event that the Grantor proposes a building modification and/or remodel, construction of any new building or buildings, improvements, appurtenances, infrastructure, telecommunications equipment and/or facilities on property within the Airport Influence Area of the San Bernardino International Airport which exceed elevations as previously reviewed and approved pursuant to a FAA Obstruction Evaluation, the Grantor shall be responsible for the preparation and submittal of such architectural plans, specifications and scaled engineering drawings and associated submittals (the "Proposed Plans") as required by the San Bernardino International Airport Authority, the State of California and the FAA. Such Proposed Plans shall be submitted to the Grantee together with an executed copy of this Grant Easement. In the event that additional design reviews and/or technical studies are required in order to obtain reviews and/or approvals as applicable from the State of California and/or the FAA, such costs shall be borne by the Grantor. The Grantee shall, upon receipt of sufficient documentation, submit to the

President, Vice-President and/or Executive Director or their designee of the San Bernardino International Airport Authority Commission all pertinent and/or required supporting plans, specifications, documents, certifications, permit applications, as may be required by applicable local, State and Federal regulatory agencies. Upon receipt, the Grantee shall submit such information to all applicable regulatory agencies for review and/or approval or disapproval. In the event that such approvals by the applicable regulatory agencies are granted, the Grantee shall submit this Grant Easement document, executed by the Grantor and together with all applicable supporting documentation, plans and applicable regulatory approvals to the Grantee for acceptance, execution and recordation.

The Grantor, together with its successors in interest and assigns, hereby waives its right to legal action against the Grantee, its successors, or assigns for monetary damages or other redress due to impacts, as described in the above Paragraphs 1-6, inclusive, of the granted rights of easement, associated with aircraft operations in the air or on the ground at the Airport, including future increases in the volume or changes in location of said operations. Furthermore, the Grantor, its successors, and assigns shall have no duty to avoid or mitigate such damages through physical modification of Airport facilities or establishment or modification of aircraft operational procedures or restrictions. This grant of avigation or flight easement (hereafter, "Avigation Easement") shall not operate to deprive the Grantor, his successor or assigns, of any rights which it may from time to time have against any individual or private operator for negligent or unlawful operation of aircraft.

For and on behalf of itself, its successors and assigns, the Grantor hereby covenants with the San Bernardino International Airport Authority as the Grantee, for the direct benefit of the real property constituting the San Bernardino International Airport, that neither the Grantor nor its successors in interest or assigns will construct, install or erect any permanent structure, (e.g., buildings, infrastructure, radio, telecommunications equipment or TV antennae tower) which extends into the Airspace within the Airport Influence Area of the San Bernardino International Airport, subject to the conditions of Paragraph 6 above, or which constitutes an obstruction to air navigation, or which obstructs or interferes with the use of the flight easements and rights-of-way herein granted. Furthermore, the Grantor, its successors and assigns, will not hereafter use or permit the use of said Parcel in such a manner as to create electrical or electronic interference with radio communication or radar operation between any installation upon the San Bernardino International Airport and any aircraft.

The easements and rights-of-way herein granted shall be deemed both appurtenant to and for the direct benefit of the real property described as San Bernardino International Airport, and shall further be deemed in gross, being conveyed to the Grantee for the benefit of the Grantee and any and all members of the general public who may use said easements or rights-of-way in landing at taking off from or operating such aircraft in or about the said San Bernardino International Airport.

These covenants and agreements run with the land and are binding upon the heirs, administrators, executors, successors and assigns of the Grantor, and for the purpose of this instrument, the real property first herein above described as the Parcel is the servient tenement and said San Bernardino International Airport is the dominant tenement.

GENERAL PROVISIONS

1. **Attorneys' Fees**. Should Grantor or Grantee or any of their respective successors or assigns retain counsel to enforce any of the provisions herein or protect their interests in any matter arising under this Avigation Easement, or to recover damages by reason of any alleged breach of any provision of this Avigation Easement, the losing party in any action pursued in a court of competent jurisdiction shall pay to the prevailing party all costs, damages, and expenses incurred by the prevailing party, including, but not limited to, attorneys' fees and costs incurred in connection therewith.

2. **Waiver**. No violation or breach of any provision of this Avigation Easement may be waived unless in writing. Waiver of any one violation or breach of any provision of this Avigation Easement shall not be deemed to be a waiver of any other violation or breach of the same or any other provision of this Avigation Easement.

3. **Severability**. In the event that any one or more covenant, condition, right or other provision contained in this Avigation Easement is held to be invalid, void or illegal by any court of competent jurisdiction, the same shall be deemed severable from the remainder of this Avigation Easement and shall in no way affect, impair or invalidate any other covenant, condition, right or other provision contained in this Avigation Easement.

4. **Additional Documents**. In addition to the documents and instruments to be delivered as provided in this Avigation Easement, Grantor or its successors and assigns, as the case may be, shall, from time to time at the request of Grantee, execute and deliver to Grantee such other documents and shall take such other action as may be reasonably required to carry out more effectively the terms of this Avigation Easement.

5. **Governing Law**. This Avigation Easement has been negotiated and entered into in the State of California, and shall be governed by, construed and enforced in accordance with the statutory, administrative and judicial laws of the State of California.

6. **Integration**. This Avigation Easement, including any exhibits, constitutes the final, complete and exclusive statement of the parties relative to the subject matter hereof and there are no oral or parol agreements existing between Grantor and Grantee relative to the subject matter hereof which are not expressly set forth herein and covered hereby. This is an integrated agreement.

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[SIGNATURES ON FOLLOWING PAGE]

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IN WITNESS WHEREOF, Grantor has hereunto set its hand and seal this _____ day of _____, 20_____.

GRANTOR

Business Entity

By:_____
Name:
Its: Partner

Accepted by San Bernardino International Airport Authority

GRANTEE

Date:_____

By:_____
Name: Michael Burrows
Its: Executive Director

(Seal)

Approved As To Form:

By:_____
General Counsel

[Notary Public attachment must accompany this instrument]

ACCEPTANCE FORM

This is to certify that the interest in real property conveyed by the deed or grant dated _____ __, 2020 from _____ to the San Bernardino International Airport Authority, a political corporation and/or governmental agency is hereby accepted by the undersigned officer or agent on behalf of the Board of Directors of the San Bernardino International Airport Authority pursuant to authority conferred by resolution of the San Bernardino International Airport adopted on _____ __, 2020, and the grantee consents to recordation thereof by its duly authorized officer.

Date: _____ __, 2020

_____

Michael Burrows, Executive Director
San Bernardino International Airport Authority

EXHIBIT C

Initial Study/Mitigated Negative Declaration:

www.sbcounty.gov/Uploads/LUS/Valley/AlmondAveWarehouse/Almond%20Ave%20Warehouse%20Draft%20Initial%20Study.pdf

EXHIBIT D

Mitigation Monitoring and Reporting Program

Mitigation Monitoring and Reporting Program
Initial Study/Mitigated Negative Declaration
77 Almond Avenue Warehouse

Prepared by:

County of San Bernardino, Land Use Services Department

385 N. Arrowhead Avenue, 1st Floor
San Bernardino, California 92415-0182
Contact: Anthony DeLuca / Senior Planner

DECEMBER 2022

Introduction

The California Environmental Quality Act (CEQA) requires that a public agency adopting a Mitigated Negative Declaration (MND) take affirmative steps to determine that approved mitigation measures are implemented after project approval. The lead or responsible agency must adopt a reporting and monitoring program for the mitigation measures incorporated into a project or included as conditions of approval. The program must be designed to ensure compliance with the MND during project implementation (California Public Resources Code, Section 21081.6(a)(1)).

This Mitigation Monitoring and Reporting Program (MMRP) will be used by the County of San Bernardino (County) to ensure compliance with adopted mitigation measures identified in the MND for the proposed Almond Avenue Warehouse Project located at 77 Almond Avenue Redlands, CA. when construction begins. The County, as the lead agency, will be responsible for ensuring that all mitigation measures are carried out. Implementation of the mitigation measures would reduce impacts to below a level of significance for biological resources, cultural resources, geology and soils, transportation, and tribal cultural resources.

The remainder of this MMRP consists of a table that identifies the mitigation measures by resource for each project component. Table 1 identifies the mitigation monitoring and reporting requirements, list of mitigation measures, the party responsible for implementing mitigation measures, timing for implementation of mitigation measures, agency responsible for monitoring of implementation, and date of completion. With the MND and related documents, this MMRP will be kept on file at the following location:

County of San Bernardino
385 N. Arrowhead Avenue, First Floor
San Bernardino, California 92415

Table 1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
Biological Resources				
BIO-1 Nesting Bird Survey: To reduce potential short- Nesting bird nesting season generally extends from February 1 through September 15 in southern California and specifically, March 15 through August 31 for migratory passerine birds. To avoid impacts to nesting birds (common and special status) during the nesting season, a qualified Avian Biologist will conduct pre-construction Nesting Bird Surveys (NBS) prior to project-related disturbance to nestable vegetation to identify any active nests. If no active nests are found, no further action will be required. If an active nest is found, the biologist will set appropriate no-work buffers around the nest which will be based upon the nesting species, its sensitivity to disturbance, nesting stage, and expected types, intensity, and duration of the disturbance. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved no-work buffer zone shall be clearly marked in the field, within which no disturbance activity shall commence until the qualified biologist has determined the young birds have successfully fledged and the nest is inactive.	Prior to Land Disturbance or Grading Permit	Project applicant	County of San Bernardino	
Cultural Resources				
CR-1 Grading Monitor. For adequate coverage and the protection of possibly significant buried resources and tribal cultural resources, a qualified archaeologist shall be retained by the applicant to monitor all ground-disturbing construction activities,	Prior to issuance of Land Disturbance or Grading Permit	Project applicant and their construction contractor	County of San Bernardino	

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
included but not limited to site preparation, grading and excavation. The applicant and archaeologist will agree on a monitoring schedule based on the necessary days of ground-disturbance. In the event that Native American cultural resources are discovered during project development/construction, all work in the immediate vicinity of the find shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the overall project may continue during this assessment period. If significant Native American cultural resources are discovered, for which a Treatment Plan must be prepared, the developer or his archaeologist shall contact any tribes claiming cultural affiliation to the area. If requested by the Tribe(s), the developer or the project archaeologist shall, in good faith, consult on the discovery and its disposition (e.g., avoidance, preservation, return of artifacts to tribe, etc.). If avoidance is not possible, an avoidance plan will be prepared and implemented based on consultation between the archaeologist and tribes. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, as detailed within TCR-1, regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.				
CR-2 Inadvertent Historical Discoveries. If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to YSMN for review and comment, as detailed within	During construction	Project applicant and their construction contractor	County of San Bernardino	

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.				
CR-3 Discovery of Human Remains. If evidence of human remains is identified, the County Coroner will be contacted immediately and permitted to inspect the remains. San Bernardino County and the Project Applicant shall also be informed of the discovery. The coroner will determine if the bones are historic/archaeological or a modern legal case. The coroner will immediately contact the Native American Heritage Commission (NAHC) in the event that remains are determined to be human and of Native American origin, in accordance with California Public Resources Code Section § 5097.98. If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project. All discovered human remains shall be treated with respect and dignity. California state law (California Health & Safety Code § 7050.5) and federal law and regulations ([Archaeological Resources Protection Act (ARPA) 16 USC 470 & 43 CFR 7], [Native American Graves Protection & Repatriation Act (NAGPRA) 25 USC 3001 & 43 CFR 10] and [Public Lands, Interior 43 CFR 8365.1-7]) require a defined protocol if human remains are discovered in the State of California regardless if the remains are modern or archaeological.	During construction	Project applicant and their construction contractor	County of San Bernardino	
Geology and Soils				
GEO-1 Inadvertent Paleontological Discoveries: If paleontological resources are discovered during earth disturbance activities, the discovery shall be	Prior to issuance of Land	Project applicant and their construction contractor	County of San Bernardino	

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
cordoned off with a 100-foot radius buffer so as to protect the discovery from further potential damage, and a county-qualified paleontologist shall be consulted to assess the discovery.	Disturbance or Grading Permit			
Transportation				
TRAN-1 Trip Reduction Program. The project shall implement a commute trip reduction program consisting of the following: <u>Commute Trip Reduction Marketing:</u> The project shall implement a marketing strategy to promote the project site employer's commute trip reduction program. The following features (or similar alternatives) of the marketing strategy are essential for effectiveness. • Onsite or online commuter information services. • Employee transportation coordinators. • Onsite or online transit pass sales. • Guaranteed ride home service. <u>Ridesharing Program:</u> The project shall implement a ridesharing program and establish a permanent transportation management association with funding requirements for employers. Ridesharing must be promoted through a multifaceted approach, such as the following examples: • Designating a certain percentage of desirable parking spaces for ridesharing vehicles. • Designating adequate passenger loading and unloading and waiting areas for ridesharing vehicles. • Providing an app or website for coordinating rides.	Ongoing	Project applicant	County of San Bernardino	

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
Tribal Cultural Resources				
TCR-1 Tribal Monitoring. The Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, as detailed in CR-1, of any pre-contact and/or historic-era cultural resources discovered during project implementation and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a cultural resource 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.	During land disturbance and construction activities	Project applicant and their construction contractor	County of San Bernardino	
TCR-2 Cultural Documents/Records. Any and all archaeological/cultural documents created as 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.	Ongoing	Project applicant and their construction contractor	County of San Bernardino	
TCR-3 Retain a Native American Monitor a. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public	Prior to commencement of ground-disturbing activities	Project applicant and their construction contractor	County of San Bernardino	

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. b. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. c. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe. d. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or				

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
(2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs. e. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.				
TCR-4 Unanticipated Discovery of Human Remains and Associated Funerary Objects: a. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. b. If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of	During land disturbance and construction activities	Project applicant and their construction contractor	County of San Bernardino	

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed. c. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). d. Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).) e. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any historic archaeological material that is not Native American in origin (non-TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.				

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
f. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.				
TCR-5 Procedures for Burials and Funerary Remains: a. As the Most Likely Descendant ("MLD"), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. b. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created. c. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials. d. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be	Ongoing	Project applicant and their construction contractor	County of San Bernardino	

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. e. In the event preservation in place is not possible despite good faith efforts by the project applicant/developer and/or landowner, before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects. f. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered. g. The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared				

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.				

EXHIBIT E

Public Comments

Comment Letter 1

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January 10, 2023

Anthony De Luca, Senior Planner
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Land Use Services Department - Planning Division
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San Bernardino, CA 92415-0187

VIA EMAIL TO:
anthony.deluca@lus.sbcounty.gov

Subject: Comments on Almond Avenue Warehouse MND (SCH NO. 2022120196)

Dear Mr. De Luca,

Thank you for the opportunity to comment on the Mitigated Negative Declaration (MND) for the proposed Almond Avenue Warehouse Project. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance (GSEJA). Also, Golden State Environmental Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877. **1-1**

1.0 Summary

The project proposes the construction and operation of one 208,000 square foot (sf), industrial warehouse building including 202,000 sf of warehousing and 6,000 sf of office space on an approximately 9.45 net acre site. The site proposes 24 truck/trailer loading dock doors, 160 passenger car parking spaces, and 31 truck/trailer parking spaces. The Proposed Project is planned to operate 24 hours a day, seven days a week. **1-2**

2.0 Project Description

The MND does not include a floor plan, detailed site plan, building elevations, or a conceptual grading plan. The basic components of a Planning Application include a detailed site plan, floor plan, conceptual grading plan, written narrative, and detailed elevations. Additionally, the site plan provided in Figure 3 has been edited to remove pertinent information from public view. For example, it does not provide any detailed information such as earthwork quantity notes or maximum building height. Providing the grading plan and earthwork quantity notes is vital as the MND does not give any information regarding any necessary truck hauling trips due to soil **1-3**

import/export during the grading phase of construction. An EIR must be prepared to include wholly accurate and adequate detailed project site plan, floor plan, grading plan, elevations, and project narrative for public review. **1-3 Cont.**

3.0 Environmental Factors Potentially Affected

II. Agriculture and Forestry Resources

The project site is designated as Prime Farmland and is an orchard. The MND states that "No land within 0.25 miles of the project site occurs within a protected land resource (i.e., under Williamson Act Contract)." The threshold of significance asks whether the project will "Conflict with existing zoning for agricultural use, or a Williamson Act contract?" The MND does not state if the proposed project site has an existing zoning designation that permits agricultural uses or a Williamson Act contract. Only information regarding the surrounding 0.25 mile area is provided. An EIR must be prepared to provide specific information regarding the proposed project site in order to adequately analyze the project in accordance with the significance thresholds. **1-4**

III. Air Quality, VI. Energy, and VIII. Greenhouse Gas Emissions

Please refer to attachments from SWAPE for a complete technical commentary and analysis. **1-5**

The MND does not include for analysis relevant environmental justice issues in reviewing potential impacts, including cumulative impacts from the proposed project. This is especially significant as the surrounding community is highly burdened by pollution. According to CalEnviroScreen 4.0[1], CalEPA's screening tool that ranks each census tract in the state for pollution and socioeconomic vulnerability, the proposed project's census tract (6071007800) ranks worse than 94% of the rest of the state overall in overall pollution burden. The surrounding community, including residences immediately adjacent (shares southern property line with the project site) to the south and additional residences to the east, bears the impact of multiple sources of pollution and is more polluted than other census tracts in many pollution indicators measured by CalEnviroScreen. For example, the project census tract ranks in the 100th percentile for ozone burden, 57th percentile for particulate matter (PM) 2.5 burden, 83rd percentile for diesel particulate matter burden, and 81st percentile for traffic burdens. All of these environmental factors are typically attributed to heavy truck activity in the area. Ozone can cause lung irritation, inflammation, and worsening of existing chronic health conditions, even at low levels of exposure[2]. The very small particles of diesel PM can reach deep into the lung, where they can contribute to a range of health problems. These include irritation to the eyes, throat and nose, heart and lung disease, and lung cancer[3]. **1-6**

[1] CalEnviroScreen 4.0 https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40
[2] OEHHA Ozone https://oehha.ca.gov/calenviroscreen/indicator/air-quality-ozone
[3] OEHHA Diesel Particulate Matter https://oehha.ca.gov/calenviroscreen/indicator/diesel-particulate-matter

The census tract ranks in the 97th percentile for hazardous waste[4] impacts. Hazardous waste generators and facilities contribute to the contamination of air, water and soil near waste generators and facilities can harm the environment as well as people. The census tract also bears more impacts from cleanup sites than 82% of the state. Chemicals in the buildings, soil, or water at cleanup sites can move into nearby communities through the air or movement of water[5].

1-6 Cont.

The census tract also ranks in the 96th percentile for drinking water, which indicates that it ranks with the worst quality drinking water in the state. Poor communities and people in rural areas are exposed to contaminants in their drinking water more often than people in other parts of the state[6].

Further, the census tract is a diverse community including 25% Hispanic, 14% African-American, and 11% Asian-American residents, whom are especially vulnerable to the impacts of pollution. The community also has a high rate of poverty, meaning 56% of the households in the census tract have a total income before taxes that is less than the poverty level. Income can affect health when people cannot afford healthy living and working conditions, nutritious food and necessary medical care[7]. Poor communities are often located in areas with high levels of pollution[8]. Poverty can cause stress that weakens the immune system and causes people to become ill from pollution[9]. Living in poverty is also an indication that residents may lack health insurance or access to medical care. Medical care is vital for this census tract as it ranks in the 45th percentile for incidence of cardiovascular disease and 76th percentile for incidence of asthma.

Additionally, the census tracts adjacent to the project site (6071980100 (north), 6071008001 (east), 6071008002 (east), and 6071007200 (west)) are identified as SB 535 Disadvantaged Communities[10]. This indicates that cumulative impacts of development and environmental impacts in the County are disproportionately impacting these communities. The negative environmental, health, and quality of life impacts resulting form a saturation of the warehousing and logistics industry in San Bernardino County have become distinctly inequitable. The severity of significant and unavoidable impacts particularly on these Disadvantaged Communities must be included for analysis as part of an EIR. Each section of the EIR must include the specific analysis of each environmental impact on the Disadvantaged Communities, including cumulative analysis and irreversible environmental effects.

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[4] OEHHA Hazardous Waste Generators and Facilities https://oehha.ca.gov/calenviroscreen/indicator/hazardous-waste-generators-and-facilities
[5] OEHHA Cleanup Sites https://oehha.ca.gov/calenviroscreen/indicator/cleanup-sites
[6] OEHHA Drinking Water https://oehha.ca.gov/calenviroscreen/drinking-water
[7] OEHHA Poverty https://oehha.ca.gov/calenviroscreen/indicator/poverty
[8] Ibid.
[9] Ibid.
[10] OEHHA SB 535 Census Tracts https://oehha.ca.gov/calenviroscreen/sb535

California s Building Energy Code Compliance Software (CBECC) is the State's only approved energy compliance modeling software for non-residential buildings in compliance with Title 24[11]. CalEEMod is not listed as an approved software. The CalEEMod-based modeling in the MND and appendices does not comply with the 2022 Building Energy Efficiency Standards and under-reports the project s significant Energy impacts and fuel consumption to the public and decision makers. Since the MND did not accurately or adequately model the energy impacts in compliance with Title 24, a finding of significance must be made. An EIR with modeling using the approved software (CBECC) must be circulated for public review in order to adequately analyze the project s significant environmental impacts. This is vital as the MND utilizes CalEEMod as a source in its methodology and analysis, which is clearly not the approved software. **1-8**

IX. Hazards and Hazardous Materials

Figure 3: Site Plan states that the maximum building height is "as determined in accordance with Part 77 of FAA Regulations." There are no building elevations provided in the MND that state the building height. An EIR must be prepared to include detailed building elevations in order to provide the public and decision makers with the proposed building height and an adequate and accurate environmental analysis. Additionally, FAA review is required and this is information not discussed or utilized for analysis in the MND. An EIR must be prepared with the specific requirements, FAA review, and utilize this information for discussion and analysis in order to adequately analyze the proposed project's potentially significant impacts. Delaying FAA review until after the CEQA process is completed is improper mitigation/deferred mitigation in violation of CEQA. **1-9**

The proposed Project site is within San Bernardino International Airport (SBDIA)/Redlands Municipal Airport Zone AR3 - Airport Safety Review Area. The MND does not provide any information regarding required review by the local Airport Land Use Commission (ALUC). An EIR must be prepared to include this information for analysis and discussion in order to provide an adequate environmental analysis. **1-10**

XI. Land Use and Planning

The project site is designated Limited Industrial by the Countywide Plan with a zoning designation of East Valley/Special Development (EV/SD). However, the EIR has not provided a consistency analysis of the proposed project in accordance with the applicable development standards of these **1-11**

[11] California Energy Commission 2022 Energy Code Compliance Software https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency-1

designations. The County General Plan was adopted with these development standards to create the maximum amount of new development (buildout projections) and determine its potentially significant impacts. Figure 3: Site Plan states that the project site is 9.54 acres, which is 415,562 square feet. The floor area ratio (FAR) of the proposed 208,000 square foot building and the project site is 50.05%. This exceeds the County General Plan maximum FAR of 50% and therefore exceeds the buildout scenario of the General Plan and its EIR. A project EIR must be prepared to analyze this potentially significant impact due to inconsistency with the General Plan development standards. **1-11 Cont.**

Further, the MND states that the project has a zoning designation of East Valley/Special Development (EV/SD). However, the County's General Plan states that the IC and IR Zones are the implementing zoning designation of the IL General Plan land use designation. An EIR must be prepared to clarify the applicable Zoning designation of the project site and its development standards. It appears that the SD designation in the Zoning Code is the most applicable to the site, which has a 50 foot height limit. Figure 3: Site Plan states that the maximum building height is "as determined in accordance with Part 77 of FAA Regulations." There are no building elevations provided in the MND. An EIR must be prepared to include detailed building elevations in order to provide the public and decision makers with the proposed building height and an adequate and accurate environmental analysis. **1-12**

The MND does not include a consistency analysis with any land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect, such as the Countywide General Plan. The MND is inadequate as an informational document and an EIR must be prepared with a consistency analysis with all General Plan policies, including the following:

1. Policy LU-2.3 Compatibility with natural environment. We require that new development is located, scaled, buffered, and designed for compatibility with the surrounding natural environment and biodiversity.
2. Policy LU-2.6 Coordination with adjacent entities. We require that new and amended development projects notify and coordinate with adjacent local, state, and federal entities to maximize land use compatibility, inform future planning and implementation, and realize mutually beneficial outcomes.
3. Policy LU-4.5 Community identity. We require that new development be consistent with and reinforce the physical and historical character and identity of our unincorporated communities, as described in Table LU-3 and in the values section of Community Action Guides. In addition, we consider the aspirations section of Community Action Guides in our review of new development.
4. Goal TM-1 Roadway Capacity Unincorporated areas served by roads with capacity that is adequate for residents, businesses, tourists, and emergency services.

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5. Policy TM-1.1 Roadway level of service (LOS). We require our roadways to be built to achieve the following minimum level of service standards during peak commute periods (typically 7:00-9:00 AM and 4:00-6:00 PM on a weekday): LOS D in the Valley Region
6. Goal TM-3 Vehicle Miles Traveled A pattern of development and transportation system that minimizes vehicle miles traveled.
7. Policy TM-3.1 VMT Reduction. We promote new development that will reduce household and employment VMT relative to existing conditions.
8. Goal NR-1 Air Quality Air quality that promotes health and wellness of residents in San Bernardino County through improvements in locally-generated emissions.
9. Policy NR-1.7 Greenhouse gas reduction targets. We strive to meet the 2040 and 2050 greenhouse gas emission reduction targets in accordance with state law.
10. Policy NR-1.9 Building design and upgrades. We use the CALGreen Code to meet energy efficiency standards for new buildings and encourage the upgrading of existing buildings to incorporate design elements, building materials, and fixtures that improve environmental sustainability and reduce emissions.
11. Policy HZ-3.1 Health risk assessment. We require projects processed by the County to provide a health risk assessment when a project could potentially increase the incremental cancer risk by 10 in 1 million or more in unincorporated environmental justice focus areas, and we require such assessments to evaluate impacts of truck traffic from the project to freeways. We establish appropriate mitigation prior to the approval of new construction, rehabilitation, or expansion permits.
12. Policy HZ-3.18 Application requirements. In order for a Planning Project Application (excluding Minor Use Permits) to be deemed complete, we require applicants to indicate whether the project is within or adjacent to an unincorporated environmental justice focus area and, if so, to: document to the County s satisfaction how an applicant will address environmental justice concerns potentially created by the project; and present a plan to conduct at least one public meeting for nearby residents, businesses, and property owners to obtain public input for applications involving a change in zoning or the Policy Plan. The County will require additional public outreach if the proposed project changes substantively in use, scale, or intensity

1-13 Cont.

Additionally, the MND does not provide any consistency analysis with SCAG's 2020-2045 Connect SoCal RTP/SCS. Due to errors in modeling and modeling without supporting evidence, as noted throughout this comment letter and attachments, the proposed project has significant potential for inconsistency with Goal 5 to reduce greenhouse gas emissions and improve air quality, Goal 6 to support healthy and equitable communities, and Goal 7 to adapt to a changing climate. An EIR must be prepared to include revised, accurate modeling and a consistency analysis with all goals of the RTP/SCS.

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XIV. Population and Housing

The MND utilizes uncertain language and does not provide any meaningful analysis or supporting evidence to substantiate the conclusion that there will be no significant impacts to population and housing. For example, the EIR states that construction jobs generated by the proposed project are

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"*temporary* and would not attract new employees to the area as available labor exists in the *region*." There is no quantification of the construction employees needed to construct the project. Stating that these workers would already reside in the "region" is misleading to the public and decision makers. Relying on the entire labor force within an undefined distance, potentially the greater SCAG region, to fill the project's construction and operational jobs will increase VMT and emissions during all phases of construction and operations and an EIR must be prepared to account for longer worker trip distances. The VMT analysis only assumed a 22.00 mile trip for employees. An EIR must be prepared to reflect longer trip distances that employees will realistically travel to work at the proposed project, including but not limited to 141 miles from Baker to the site, 78 miles from Barstow, 81 miles to Twentynine Palms, and 40 miles to Chino Hills. An EIR must also include a construction worker employment trip analysis must also be included to adequately and accurately analyze all potentially significant environmental impacts.

1-15 Cont.

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The MND concludes that the proposed project "would require an estimated maximum of ten warehouse staff and office employees, who would come from the local labor pool." However, the MND does not provide a source methodology that resulted in the calculation of ten employees during project operations. SCAG s Employment Density Study[12] provides the following applicable employment generation rates for San Bernardino County:

Warehouse: 1 employee per 1,195 square feet
Office: 1 employee per 697 square feet

Applying these ratios results in the following calculation:

Warehouse: 202,000 sf / 1,195 sf = 170 employees

Office : 6,000 sf / 697 sf = 9 employees

Total: 179 employees

Utilizing SCAG s Employment Density Study ratios, the proposed project will generate 179 employees. The MND utilizes uncertain and misleading language which does not provide any meaningful analysis of the project s population and employment generation. In order to comply with CEQA s requirements for meaningful disclosure, an EIR must be prepared to provide an accurate estimate of employees generated by all uses of the proposed project. It must also provide demographic and geographic information on the location of qualified workers to fill these positions.

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[12] SCAG Employment Density Study
http://www.mwcog.org/file.aspx?A=QTTlTR24POOOUIw5mPNzK8F4d8djdJe4LF9Exj6lXOU%3D

The planned growth for San Bernardino County is developed by the Southern California Association of Governments (SCAG). SCAG's Connect SoCal Demographics and Growth Forecast[13] states that the unincorporated areas of San Bernardino County will add 14,100 jobs between 2016 - 2045. Utilizing SCAG s Employment Density Study calculation of 179 employees, the project represents 1.2% of unincorporated San Bernardino County s employment growth from 2016 - 2045. A single project accounting for this amount of growth within unincorporated San Bernardino County over 29 years represents a significant amount of growth. An EIR must be prepared to include this analysis, and also provide a cumulative analysis discussion of projects approved since 2016 and projects "in the pipeline" to determine if the project will exceed SCAG's employment and/or population growth forecast. For example, other recent industrial projects such as Bloomington Business Park SP (2,708 employees), Speedway Commerce Center II SP (3,732 employees), Arrow Route Warehouse (180 employees), Duke Slover and Alder (217 employees) combined with the proposed project will cumulatively generate 7,196 employees, which is 51% of the County's employment growth forecast over 29 years. This number increases exponentially when the County's commercial development activity is added to the calculation. An EIR must be prepared to include a cumulative analysis on this topic. **1-17 Cont.**

Further, the MND is internally inconsistent and therefore an inadequate informational document. Here, the MND states that the "the Proposed Project require the removal of the residential structure, however, one residential structure is not a substantial number" of existing houses and no people occupy the residence." The MND utilizes this information to determine the project will have less than significant impacts. The Traffic Analysis credits the project with existing trips generated by the residence. This reduces the amount of trips generated by the proposed project and utilizes a "net trip generation" for analysis. The MND has chosen to state if the existing onsite residence is vacant or occupied based upon the threshold of significance at hand. It has provided conflicting information and skewed its analysis, rendering it an inadequate informational document and an EIR must be prepared to provide an adequate environmental analysis. **1-18**

XVII. Transportation

The MND has not adequately analyzed the project's potential to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses; or the project's potential to result in inadequate emergency access. Figure 3: Site Plan depicts that the western project site driveway (truck access point) is not wide enough to accommodate heavy trucks. The driveway area does not provide sufficient space to execute turning maneuvers. As shown on Figure 3, the lines that depict each of the 2 trucks (1 truck exiting the site and 1 truck **1-19**

[13] SCAG Connect SoCal Demographics and Growth Forecast adopted September 3, 2020 https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579

entering the site) overlap on both Almond Avenue itself and the project driveway. The overlapping lines mean that if two trucks were to enter and exit the site using the western driveway at the same time, they would collide because there is not adequate maneuvering space. A finding of significance must be made as part of an EIR due to this. **1-19 Cont.**

Additionally, an EIR must be prepared to consider the available space on Almond Avenue for trucks utilizing the western driveway and the driveway of the adjacent site to the west, which is less than 25 feet from the project's western driveway. Due to the truck maneuvering issues discussed above, there is significant potential for the adjacent site's driveway and the proposed project driveway to not provide sufficient space to execute truck/trailer turning maneuvers.

The project's VMT is estimated to be 22.00 VMT per employee. This exceeds the County's 2016 baseline VMT per employee of 20.6 VMT and is a significant impact. The MND includes MM TRAN-1 to implement a commute trip reduction program consisting of marketing to employees and a rideshare program. The MND concludes that MM-TRAN 1 will reduce project VMT by 8% and result in less than significant impacts. However, this is unenforceable mitigation in violation of CEQA § 21081.6 (b). It is not possible for the City to ensure that MM TRAN-1 will be implemented continuously, at all times, throughout the life of the project and maintain a trip reduction of at least 8% at all times. An EIR must be prepared to include a finding of significance because there is no possible assurance of the percentage of project employees that would utilize the commute trip reduction programs and mitigation of the project's VMT impact to less than significant is not feasible. **1-20**

Further, the MND has underreported the quantity VMT generated by the proposed project operations. The operational nature of industrial/warehouse uses involves high rates of truck/trailer/delivery van VMT due to traveling from large import hubs to regional distribution centers to smaller industrial parks and then to their final delivery destinations. Once employees arrive at work at the proposed project, they will conduct their jobs by driving delivery vans across the region as part of the daily operations as a warehouse, which will drastically increase project-generated VMT. The project's truck/trailer and delivery van activity is unable to utilize public transit or active transportation and it is misleading to the public and decision makers to exclude this activity from VMT analysis. Table 5.9 Operational Mobile Sources Trip Summary of the CalEEMod output sheets Appendix indicates that the project will generate approximately 1,256,937 annual VMT (1,256,937 / 365 days = 3,444 daily total VMT). This quantity of VMT vastly exceeds the VMT analysis report of 22.00 VMT per employee. The project's actual VMT generated is not consistent with the significance threshold and legislative intent of SB 743 to reduce greenhouse gas emissions by reducing VMT. An EIR must be prepared to reflect a quantified VMT analysis that includes all truck/trailer and delivery van activity. **1-21**

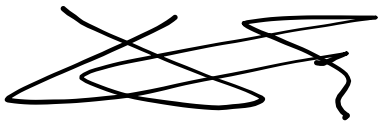
XXI. Mandatory Findings of Significance

An EIR must be prepared to include a cumulative analysis discussion here to demonstrate the impact of the proposed project in a cumulative setting. For example, other recent industrial projects such as Bloomington Business Park SP (2,708 employees), Speedway Commerce Center II SP (3,732 employees), Arrow Route Warehouse (180 employees), Duke Slover and Alder (217 employees) combined with the proposed project will cumulatively generate 7,196 employees, which is 51% of the County's employment growth forecast over 29 years. This total increases exponentially when commercial development activity is added to the industrial activity. An EIR must be prepared to include this information for analysis and also include a cumulative development analysis of projects approved since 2016 and projects "in the pipeline" to determine if the proposed project exceeds the General Plan growth estimates and/or SCAG's growth forecasts for cumulative analysis. **1-22**

Conclusion

For the foregoing reasons, GSEJA believes the MND is flawed and an EIR must be prepared for the proposed project and circulated for public review. Golden State Environmental Justice Alliance requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877. **1-23**

Sincerely,



Gary Ho
Blum Collins & Ho, LLP

Attachments:
1. SWAPE Analysis

Letter 1A

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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December 23, 2022

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Subject: Comments on the Almond Avenue Warehouse Project (SCH No. 2022120196)

Dear Mr. Ho,

We have reviewed the December 2022 Initial Study and Mitigated Negative Declaration ("IS/MND") for the Almond Avenue Warehouse ("Project") located in the City of San Berardino ("City"). The Project proposes to construct a 208,000-square-foot ("SF") warehouse and 160 parking spaces on the 9.54-acre site.

Our review concludes that the IS/MND fails to adequately evaluate the Project's hazards, hazardous materials, air quality, health risk, and greenhouse gas impacts. As a result, emissions and health risk impacts associated with construction and operation of the proposed Project are underestimated and inadequately addressed. An Environmental Impact Report ("EIR") should be prepared to adequately assess and mitigate the potential hazards, hazardous materials, air quality, health risk, and greenhouse gas impacts that the project may have on the environment. **1A-1**

Hazards and Hazardous Materials

Inadequate Disclosure and Analysis of Impacts

Regarding past uses of the Project site, the IS/MND states:

> "As the Site was used for agricultural purposes, there is a potential for pesticides to have been applied to the trees but given the nature of the Site as an Orchard and fact that the Site will be developed for commercial/industrial purposes, the likelihood of elevated concentrations of pesticides to remain on-site is low" (p. 40). **1A-2**

The potential for residual concentrations of pesticides to remain in Project site soils can only be evaluated though a program of soil sampling. As the Project site was used for agricultural practices continuously since 1930, various pesticides may be present in the soil, including DDT, DDE, and chlordane. The U.S. EPA identifies DDT and DDE as probable human carcinogens, and exposure to DDT can result in headaches, nausea, and convulsions.[1] Chlordane has also been classified as a probable human carcinogen by the U.S. EPA.[2]

According to the Phase I Environmental Site Assessment ("ESA"), provided as Appendix B to the IS/MND, the Project site has been used for agriculture for more than 90 years (p. 5). As such, a sampling investigation for residual concentrations of pesticides in soil is justified and the results should be disclosed in an EIR. The sampling should follow guidance published by the DTSC, entitled "Interim Guidance for Sampling Agricultural Properties." [3] The results of the sampling should be evaluated for health risks and any mitigation necessary to protect the health of construction workers and adjacent residents. Any contamination that is identified above regulatory screening levels, including California Office of Environmental Health Hazard Assessment's Screening Levels[4], should be further evaluated and cleaned up, if necessary, in coordination with the Regional Water Quality Control Board and the California Department of Toxics Substances Control.

1A-2 Cont.

Air Quality

Failure to Provide Complete CalEEMod Output Files and Unsubstantiated Inputs

Land use development projects under the California Environmental Quality Act ("CEQA") typically evaluate air quality impacts and calculate potential criteria air pollutant emissions using the California Emissions Estimator Model ("CalEEMod"). [5] CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but CEQA requires that such changes be justified by substantial evidence. Once all of the values are inputted into the model, the Project's construction and operational emissions are calculated, and "output files" are generated. These output files disclose to the reader what parameters are utilized in calculating the Project's air pollutant emissions and make known which default values are changed as well as provide justification for the values selected.

1A-3

[1] "ToxFAQs for DDT, DDE, and DDD." Agency for Toxic Substances and Disease Registry (ATSDR), April 2022, *available at:* https://wwwn.cdc.gov/TSP/ToxFAQs/ToxFAQsDetails.aspx?faqid=80&toxid=20.
[2] "ToxFAQs for Chlordane." Agency for Toxic Substances and Disease Registry (ATSDR), February 2018, available at: https://wwwn.cdc.gov/TSP/ToxFAQs/ToxFAQsDetails.aspx?faqid=354&toxid=62.
[3] "Interim Guidance for Sampling Agricultural Properties." California Department Of Toxic Substances Control (DTSC), August 2008, *available at:* https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/Ag-Guidance-Rev-3-August-7-2008-2.pdf.
[4] "HERO HHRA Note Number: 3, DTSC-modified Screening Levels (DTSC-SLs)." California Department Of Toxic Substances Control (DTSC) & Human And Ecological Risk Office (HERO), June 2020, *available at:* https://dtsc.ca.gov/wp-content/uploads/sites/31/2022/02/HHRA-Note-3-June2020-Revised-May2022A.pdf.
[5] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide.

Regarding the evaluation of the criteria air pollutant emissions associated with Project construction and operation, the IS/MND states:

1A-3 Cont.

> "The Proposed Project's construction and operational emissions were estimated using CalEEMod version 2022.1 (see Appendix A)" (p. 17).

As discussed above, the IS/MND relies on CalEEMod Version 2022.1 to estimate the Project's emissions. However, this poses a problem as the currently available version is a soft-release which fails to provide complete output files. [6] Specifically, the "User Changes to Default Data" table no longer provides the quantitative counterparts to the changes to the default values (see excerpt below) (Appendix A, pp. 49):

8. User Changes to Default Data

Screen	Justification
Characteristics: Project Details	Per anticipated construction schedule
Construction: Construction Phases	Per anticipated construction schedule. 6 weeks painting period.
Operations: Vehicle Data	Per TIA
Operations: Fleet Mix	Per TIA
Operations: Water and Waste Water	Parking lot has no water needs

However, previous CalEEMod Versions, such as 2020.4.0, include the specific numeric changes to the model's default values (see example excerpt below):

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	230.00	167.00
tblConstructionPhase	PhaseEndDate	11/22/2023	8/25/2023
tblConstructionPhase	PhaseEndDate	9/27/2023	6/30/2023
tblConstructionPhase	PhaseEndDate	10/25/2023	7/28/2023
tblConstructionPhase	PhaseStartDate	10/26/2023	7/29/2023
tblConstructionPhase	PhaseStartDate	9/28/2023	7/1/2023
tblLandUse	LandUseSquareFeet	160,000.00	160,371.00
tblLandUse	LandUseSquareFeet	119,000.00	41,155.00
tblLandUse	LotAcreage	3.67	3.68
tblLandUse	LotAcreage	2.73	2.74

Thus, the output files associated with CalEEMod Version 2022.1 fail to divulge the exact parameters utilized to calculate Project emissions. To remedy this issue, the IS/MND should have provided access to the model's ".JSON" output files, which allow third parties to review the model's revised input parameters.[7] Without access to the complete output files, including the specific numeric changes to the default values, we cannot verify that the IS/MND's air modeling and subsequent analysis is an accurate reflection of the proposed Project. As a result, an EIR should be prepared to include an updated air

[6] "CalEEMod California Emissions Estimator Model Soft Release." California Air Pollution Control Officers Association (CAPCOA), 2022, *available at:* https://caleemod.com/.
[7] "Video Tutorials for CalEEMod Version 2022.1." California Air Pollution Control Officers Association (CAPCOA), May 2022, *available at:* https://www.caleemod.com/tutorials.

quality analysis that correctly provides the complete output files for CalEEMod Version 2022.1, or includes an updated model using an older release of CalEEMod.[8]

1A-3 Cont.

Unsubstantiated Input Parameters Used to Estimate Project Emissions

As previously discussed, the IS/MND relies on CalEEMod Version 2022.1 to estimate the Project's air quality emissions and fails to provide the complete output files required to adequately evaluate model's analysis (p. 17).[9] Regardless, when reviewing the "Almond Industrial Detailed Report," provided as Appendix A to the IS/MND, we were able to identify several model inputs that are inconsistent with information disclosed in the IS/MND. Thus, the Project's construction and operation emissions are underestimated. As a result, an EIR should be prepared to include an updated air quality analysis that adequately evaluates the impacts that construction and operation of the Project will have on local and regional air quality.

Failure to Model Potential Cold Storage Requirements

Review of the CalEEMod output files demonstrates that the "Almond Industrial" model includes the entirety of the warehouse space as unrefrigerated (see excerpt below) (Appendix A, pp. 7).

1A-4

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)
Unrefrigerated Warehouse-No Rail	208	1000sqft	4.78	208,000	42,817
Parking Lot	165	1000sqft	3.79	0.00	—

As demonstrated above, the model includes the 208,000-SF warehouse as unrefrigerated warehouse space. However, this is potentially incorrect, as the IS/MND fails to identify the Project's future tenants or discuss if the proposed warehouse would include cold storage uses or not.

This presents an issue, as refrigerated warehouses release more air pollutants and greenhouse gas ("GHG") emissions when compared to unrefrigerated warehouses for three reasons. First, warehouses equipped with cold storage (refrigerators and freezers, for example) are known to consume more energy when compared to warehouses without cold storage.[10] Second, warehouses equipped with cold storage typically require refrigerated trucks, which are known consume more fuel and idle longer than unrefrigerated hauling trucks in order to keep their contents cold.[11] Third, according to an October 2016 Institute of Transportation Engineers ("ITE") report entitled *High-Cube Warehouse Vehicle Trip Generation Analysis*, cold storage warehouses result in greater trip rates when compared to transload &

[8] "CalEEMod Version 2020.4.0." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* http://www.aqmd.gov/caleemod/download-model.
[9] "CalEEMod Version 2022.1.0." California Air Pollution Control Officers Association (CAPCOA), May 2022, *available at:* https://www.caleemod.com/.
[10] Managing Energy Costs in Warehouses, Business Energy Advisor, *available at*: http://bizenergyadvisor.com/warehouses.
[11] "Estimation of Fuel Use by Idling Commercial Trucks." Argonne National Laboratory, *available at:* http://www.transportation.anl.gov/pdfs/TA/373.pdf, p. 8.

short-term storage warehouses.[12] Furthermore, as stated by the California Supreme Court, CEQA was "intended to be interpreted in such manner as to afford the fullest possible protection to the environment."[13] As refrigerated warehouse space is the most energy-intensive, the Project should have included some, or all, of the proposed warehouse space as cold storage in order to conduct the most conservative analysis.

1A-4 Cont.

Unsubstantiated Changes to Architectural Coating Construction Phase Length

Review of the CalEEMod output files demonstrate that the "Almond Industrial" model includes a manual change to the default architectural construction phase length (see excerpt below) (Appendix A, pp. 49).

Screen	Justification
Characteristics: Project Details	Per anticipated construction schedule
Construction: Construction Phases	Per anticipated construction schedule. 6 weeks painting period.
Operations: Vehicle Data	Per TIA
Operations: Fleet Mix	Per TIA
Operations: Water and Waste Water	Parking lot has no water needs

As a result of this change, the model includes the following construction schedule (see excerpt below) (Appendix A, pp. 35, 36).

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase
Demolition	Demolition	1/3/2023	1/31/2023	5.00	20.0
Site Preparation	Site Preparation	2/1/2023	2/15/2023	5.00	10.0
Grading	Grading	2/16/2023	3/16/2023	5.00	20.0
Building Construction	Building Construction	3/17/2023	2/2/2024	5.00	230
Paving	Paving	2/3/2024	3/2/2024	5.00	20.0
Architectural Coating	Architectural Coating	3/3/2024	4/14/2024	5.00	30.0

1A-5

As previously mentioned, the CalEEMod User's Guide requires any changes to model defaults be justified.[14] According to the "User Changes to Default Data" table, the justification provided for these changes is:

> "Per anticipated construction schedule. 6 weeks painting period." (Appendix A, pp. 49).

Furthermore, regarding the Project's anticipated induvial construction phase lengths, the IS/MND states:

> "Construction emissions are considered short-term, temporary emissions and were modeled with the following construction parameters: demolition (20-days), site preparation (10-days), site grading (fine and mass grading, 20-days), building construction (230-days), paving (20-days) and architectural coating (30-days)" (p. 17).

[12] "HIGH-CUBE WAREHOUSE VEHICLE TRIP GENERATION ANALYSIS." ITE, October 2016, *available at:* https://www.ite.org/pub/?id=a3e6679a%2De3a8%2Dbf38%2D7f29%2D2961becdd498, p. 13.
[13] Friends of Mammoth v. Board of Supervisors, Supreme Court of California, *available at:* https://scocal.stanford.edu/opinion/friends-mammoth-v-board-supervisors-32943.
[14] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 1, 14.

However, this change remains unsupported, as the IS/MND fails to provide a justification or a source to support the revised architectural coating construction phase length. This is incorrect, as according to the CalEEMod User's Guide:

> "CalEEMod was also designed to allow the user to change the defaults to reflect site- or project-specific information, when available, provided that the information is supported by substantial evidence as required by CEQA." [15]

Absent additional information regarding the architectural coating construction phase, we cannot verify that the revised duration, as included in the model, is accurate, and the change remains unsubstantiated.

These unsubstantiated changes present an issue, as the construction emissions from architectural coating are improperly spread out over a longer period of time. As a result, there will be less construction activities required per day and, consequently, less pollutants emitted per day. Therefore, the model may underestimate the peak daily emissions associated with of construction and should not be relied upon to determine Project significance. Until a proper source is provided for the revised architecual coating construction phase length, the model should have left the phase as default.

1A-5 Cont.

Updated Analysis Indicates a Potentially Significant Air Quality Impact

In an effort to more accurately estimate Project's construction-related emissions, we prepared an updated air model using CalEEMod Version 2022.1.1.2. In our updated model, we omitted the revision to the length of the architectural coating construction phase. All other values were set to match the IS/MND's CalEEMod model or left as default.[16]

1A-6

Our updated analysis estimates that the Project's combined construction-related VOC emissions exceed the applicable South Coast Air Quality Management District ("SCAQMD") threshold of 75 pounds per day ("lbs/day"), as referenced by the IS/MND (p. 18, Table 3) (see table below).

[15] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 13, 14.
[16] See Attachment A for updated CalEEMod output files.

SWAPE Criteria Air Pollutant Emissions	
Construction	**ROG** (lbs/day)
IS/MND	66.0
SWAPE	97.6
% Increase	48%
SCAQMD Threshold	**75**
Exceeds?	***Yes***

1A-6 Cont.

As demonstrated above, the Project's construction-related VOC emissions, as estimated by SWAPE, increase by approximately 48% and exceed the applicable SCAQMD significance threshold. Thus, our model demonstrates that the Project would result in a potentially significant air quality impact that was not previously identified or addressed in the IS/MND. An EIR should be prepared to adequately assess and mitigate the potential air quality impacts that the Project may have on the environment.

Disproportionate Health Risk Impacts of Warehouses on Surrounding Communities

Upon review of the IS/MND, we have determined that the development of the proposed Project would result in disproportionate health risk impacts on community members living, working, and going to school within the immediate area of the Project site. According to the SCAQMD:

> "Those living within a half mile of warehouses are more likely to include communities of color, have health impacts such as higher rates of asthma and heart attacks, and a greater environmental burden."[17]

1A-7

In particular, the SCAQMD found that more than 2.4 million people live within a half mile radius of at least one warehouse, and that those areas not only experience increased rates of asthma and heart attacks, but are also disproportionately Black and Latino communities below the poverty line.[18] Another study similarly indicates that "neighborhoods with lower household income levels and higher percentages of minorities are expected to have higher probabilities of containing warehousing facilities."[19] Additionally, a report authored by the Inland Empire-based People's Collective for Environmental Justice and University of Redlands states:

> "As the warehouse and logistics industry continues to grow and net exponential profits at record rates, more warehouse projects are being approved and constructed in low-income

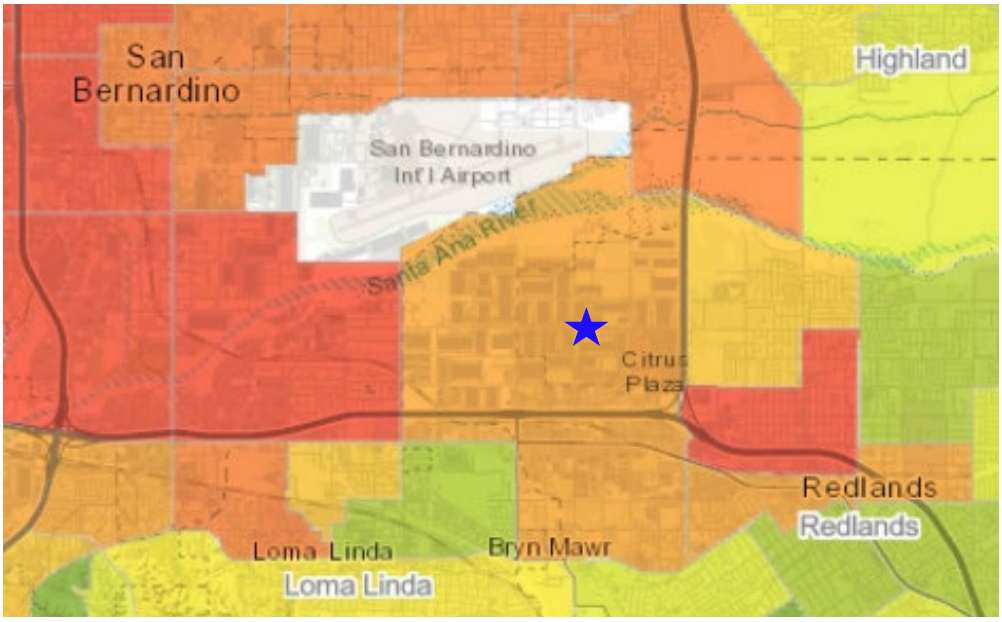
[17] "South Coast AQMD Governing Board Adopts Warehouse Indirect Source Rule." SCAQMD, May 2021, *available at:* http://www.aqmd.gov/docs/default-source/news-archive/2021/board-adopts-waisr-may7-2021.pdf?sfvrsn=9.
[18] "Southern California warehouse boom a huge source of pollution. Regulators are fighting back." Los Angeles Times, May 2021, *available at:* https://www.latimes.com/california/story/2021-05-05/air-quality-officials-target-warehouses-bid-to-curb-health-damaging-truck-pollution.
[19] "Location of warehouses and environmental justice: Evidence from four metros in California." Metro Freight Center of Excellence, January 2018, *available at:* https://www.metrans.org/assets/research/MF%201.1g_Location%20of%20warehouses%20and%20environmental%20justice_Final%20Report_021618.pdf, p. 21.

communities of color and serving as a massive source of pollution by attracting thousands of polluting truck trips daily. Diesel trucks emit dangerous levels of nitrogen oxide and particulate matter that cause devastating health impacts including asthma, chronic obstructive pulmonary disease (COPD), cancer, and premature death. As a result, physicians consider these pollution-burdened areas 'diesel death zones."[20]

1A-7 Cont.

It is evident that the continued development of industrial warehouses within these communities poses a significant environmental justice challenge. However, the acceleration of warehouse development is only increasing despite the consequences on public health. The Inland Empire alone is adding 10 to 25 million SF of new industrial space each year.[21]

San Bernardino, the setting of the proposed Project, has long borne a disproportionately high pollution burden compared to the rest of California. When using CalEnviroScreen 4.0, CalEPA's screening tool that ranks each census tract in the State for pollution and socioeconomic vulnerability, we found that the Project's census tract is in the 72nd percentile of most polluted census tracts in the State (see excerpt below).[22]



Furthermore, the Data Visualization Tool for Mates V, a monitoring and evaluation study conducted by SCAQMD, demonstrates that the proposed setting of the Project already exhibits a heightened

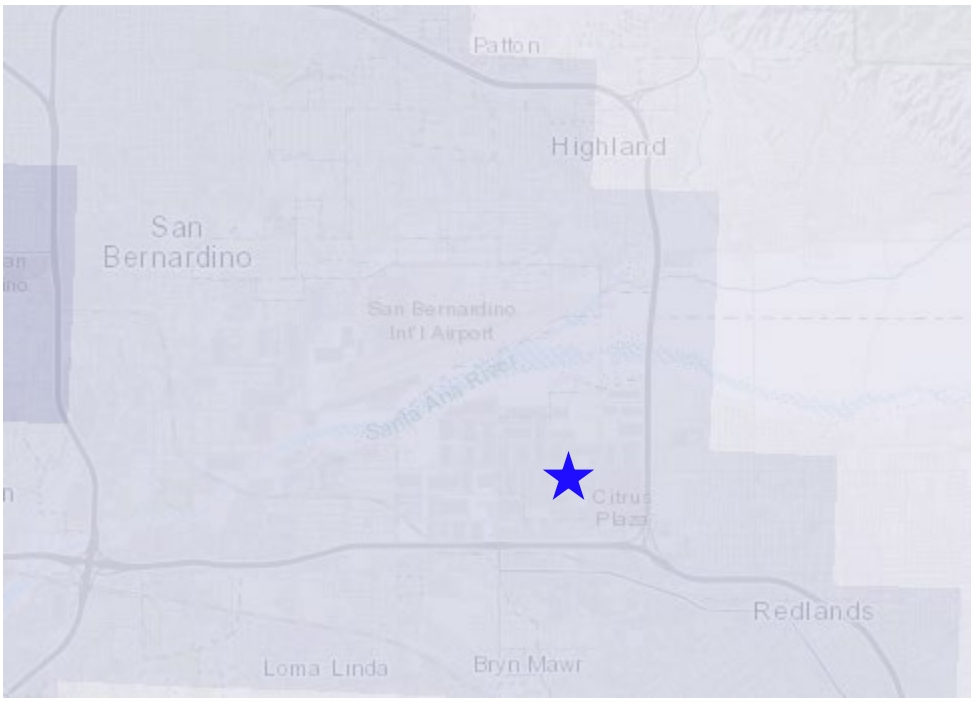
[20] "Warehouses, Pollution, and Social Disparities: An analytical view of the logistics industry's impacts on environmental justice communities across Southern California." People's Collective for Environmental Justice, April 2021, *available at:* https://earthjustice.org/sites/default/files/files/warehouse_research_report_4.15.2021.pdf, p. 4.

[21] "2020 North America Industrial Big Box Review & Outlook." CBRE, 2020, *available at:* https://www.cbre.com/-/media/project/cbre/shared-site/insights/local-responses/industrial-big-box-report-inland-empire/local-response-2020-ibb-inland-empire-overview.pdf, p. 2.

[22] "CalEnviroScreen 4.0." California Office of Environmental Health Hazard Assessment (OEHHA), October 2021, *available at:* https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40.

residential carcinogenic risk from exposure to air toxics. Specifically, the location of the Project site is in the 81st percentile of highest cancer risks in the South Coast Air Basin, with a cancer risk of 479 in one million (see excerpt below).[23]

1A-7 Cont.



Therefore, development of the proposed warehouse would disproportionately contribute to and exacerbate the health conditions of the residents in San Bernardino.

In April 2022, the American Lung Association ranked San Bernadino County as the worst for ozone pollution in the nation.[24] The Los Angeles Times also reported that San Bernardino County had 130 bad air days for ozone pollution in 2020, violating federal health standards on nearly every summer day.[25] Downtown Los Angeles, by comparison, had 22 ozone violation days in 2020. This year, the County continues to face the worst ozone pollution, as it has seen the highest recorded Air Quality Index ("AQI") values for ground-level ozone in California.[26] The U.S. Environmental Protection Agency ("EPA")

1A-8

[23] "Residential Air Toxics Cancer Risk Calculated from Model Data in Grid Cells." MATES V, 2018, *available at:* https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/Main-Page/?views=Click-tabs-for-other-data%2CGridded-Cancer-Risk; see also: "MATES V Multiple Air Toxics Exposure Study." SCAQMD, *available at:* http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v.
[24] "State of the Air 2022." American Lung Association, April 2022, *available at:* https://www.lung.org/research/sota/key-findings/most-polluted-places.
[25] "Southern California warehouse boom a huge source of pollution. Regulators are fighting back." Los Angeles Times, May 2021, *available at:* https://www.latimes.com/california/story/2021-05-05/air-quality-officials-target-warehouses-bid-to-curb-health-damaging-truck-pollution.
[26] "High Ozone Days." American Lung Association, 2022, *available at:* https://www.lung.org/research/sota/city-rankings/states/california.

indicates that ozone, the main ingredient in "smog," can cause several health problems, which includes aggravating lung diseases and increasing the frequency of asthma attacks. The U.S. EPA states:

1A-8 Cont.

> "Children are at greatest risk from exposure to ozone because their lungs are still developing and they are more likely to be active outdoors when ozone levels are high, which increases their exposure. Children are also more likely than adults to have asthma."[27]

Furthermore, regarding the increased sensitivity of early-life exposures to inhaled pollutants, the California Air Resources Board ("CARB") states:

> "Children are often at greater risk from inhaled pollutants, due to the following reasons:
>
> - Children have unique activity patterns and behavior. For example, they crawl and play on the ground, amidst dirt and dust that may carry a wide variety of toxicants. They often put their hands, toys, and other items into their mouths, ingesting harmful substances. Compared to adults, children typically spend more time outdoors and are more physically active. Time outdoors coupled with faster breathing during exercise increases children's relative exposure to air pollution.
>
> - Children are physiologically unique. Relative to body size, children eat, breathe, and drink more than adults, and their natural biological defenses are less developed. The protective barrier surrounding the brain is not fully developed, and children's nasal passages aren't as effective at filtering out pollutants. Developing lungs, immune, and metabolic systems are also at risk.
>
> - Children are particularly susceptible during development. Environmental exposures during fetal development, the first few years of life, and puberty have the greatest potential to influence later growth and development."[28]

A Stanford-led study also reveals that children exposed to high levels of air pollution are more susceptible to respiratory and cardiovascular diseases in adulthood.[29] Thus, given children's higher propensity to succumb to the negative health impacts of air pollutants, and as warehouses release more smog-forming pollution than any other sector, it is necessary to evaluate the specific health risk that warehouses pose to children in the nearby community.

According to the above-mentioned study by the People's Collective for Environmental Justice and University of Redlands, there are 640 schools in the South Coast Air Basin that are located within half a

[27] "Health Effects of Ozone Pollution." U.S. EPA, May 2021, *available at:* https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution.
[28] "Children and Air Pollution." California Air Resources Board (CARB), *available at:* https://ww2.arb.ca.gov/resources/documents/children-and-air-pollution.
[29] "Air pollution puts children at higher risk of disease in adulthood, according to Stanford researchers and others." Stanford, February 2021, *available at:* https://news.stanford.edu/2021/02/22/air-pollution-impacts-childrens-health/.

mile of a large warehouse, most of them in socio-economically disadvantaged areas.[30] Regarding the proposed Project itself, the IS/MND states:

> "The Packing House Christian Academy is the nearest school to the Project Site. It occurs approximately 0.26 miles northeast of the Project Site at 9700 Alabama Street" (p. 40).

As discussed above, Packing House Christian Academy is located within half of a mile from the Project site. This poses a significant threat, as children are a vulnerable population that are more susceptible to the damaging side effects of air pollution. As such, the Project would have detrimental short-term and long-term health impacts on local children if approved.

1A-8 Cont.

An EIR should be prepared to evaluate the disproportionate impacts of the proposed warehouse on the community adjacent to the Project, including an analysis of the impact on children and people of color who live and attend school in the surrounding area. In order to evaluate the cumulative air quality impact from the several warehouse projects proposed or built in a one-mile radius of the Project site, the EIR should prepare a cumulative health risk assessment ("HRA") to quantify the adverse health outcome from the effects of exposure to multiple warehouses in the immediate area in conjunction with the poor ambient air quality in the Project's census tract.

1A-9

Greenhouse Gas

Failure to Adequately Evaluate Greenhouse Gas Impacts

The IS/MND estimates that the Project would generate net annual GHG emissions of 2,038.8 metric tons of carbon dioxide equivalents per year ("MT CO_2e/year"), which would not exceed the SCAQMD threshold of 3,000 MT CO_2e/year (p. 37, Table 7) (see excerpt below).

Table 7
Greenhouse Gas Operational Emissions
(Metric Tons per Year)

Source/Phase	CO_2	CH_4	N_20	R[1]
Mobile	519	0.0	0.0	0.9
Area	4.2	0.0	0.0	---
Energy	385	0.0	0.0	---
Water	67.6	1.6	0.0	---
Waste	17.4	1.7	0.0	---
Refrigeration	---	---	---	918
Construction Amortized 30 Years	17.8			
Total ($MTCO_2e$)	**2,038.8**			
San Bernardino County Screening Threshold	**3,000**			
Significant	**No**			

1A-10

[30] "Warehouses, Pollution, and Social Disparities: An analytical view of the logistics industry's impacts on environmental justice communities across Southern California." People's Collective for Environmental Justice, April 2021, *available at:* https://earthjustice.org/sites/default/files/files/warehouse_research_report_4.15.2021.pdf, p. 4.

However, the IS/MND's analysis, as well as the subsequent less-than-significant impact conclusion, is incorrect for three reasons. 1A-10 Cont.

(1) The IS/MND's quantitative GHG analysis relies upon a flawed air model;
(2) The IS/MND's quantitative GHG analysis relies upon an outdated threshold; and
(3) The IS/MND's unsubstantiated air model indicates a potentially significant impact.

1) Incorrect and Unsubstantiated Quantitative Analysis of Emissions

As previously stated, the IS/MND estimates that the Project would generate net annual GHG emissions of 2,038.8 MT CO_2e/year (p. 37, Table 7). However, the IS/MND's quantitative GHG analysis is unsubstantiated. As previously discussed, when we reviewed the Project's CalEEMod output files, provided in Appendix A to the IS/MND, we found that several of the values inputted into the models are not consistent with information disclosed in the IS/MND. As a result, the models underestimate the Project's emissions, and the IS/MND's quantitative GHG analysis should not be relied upon to determine Project significance. An EIR should be prepared that adequately assesses the potential GHG impacts that construction and operation of the proposed Project may have on the environment. 1A-11

2) Incorrect Reliance on an Outdated Quantitative GHG Threshold

As previously stated, the IS/MND estimates that the Project would generate net annual GHG emissions of 2,038.8 MT CO_2e/year, which would not exceed the SCAQMD threshold of 3,000 MT CO_2e/year (p. 37, Table 7). However, the guidance that provided the 3,000 MT CO_2e/year threshold, the SCAQMD's 2008 *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules, and Plans* report, was developed when the Global Warming Solutions Act of 2006, commonly known as "AB 32", was the governing statute for GHG reductions in California. AB 32 requires California to reduce GHG emissions to 1990 levels by 2020.[31] Furthermore, AEP guidance states: 1A-12

> "[F]or evaluating projects with a post 2020 horizon, the threshold will need to be revised based on a new gap analysis that would examine 17 development and reduction potentials out to the next GHG reduction milestone."[32]

As it is currently December 2022, thresholds for 2020 are not applicable to the proposed Project and should be revised to reflect the current GHG reduction target. As such, the SCAQMD bright-line threshold of 3,000 MT CO_2e/year is outdated and inapplicable to the proposed Project, and the IS/MND's less-than-significant GHG impact conclusion should not be relied upon. Instead, we recommend that the Project apply the SCAQMD 2035 service population efficiency target of 3.0 metric

[31] "Health & Safety Code 38550." California State Legislature, January 2007, *available at:* https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=HSC&sectionNum=38550.
[32] "Beyond Newhall and 2020: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California." Association of Environmental Professionals (AEP), October 2016, *available at:* https://califaep.org/docs/AEP-2016_Final_White_Paper.pdf, p. 39.

tons of carbon dioxide equivalents per service population per year ("MT CO_2e/SP/year"), which was calculated by applying a 40% reduction to the 2020 targets.[33]

1A-12 Cont.

3) Failure to Identify a Potentially Significant GHG Impact

In an effort to quantitatively evaluate the Project's GHG emissions, we compared the Project's GHG emissions, as estimated by the IS/MND, to the SCAQMD 2035 service population efficiency target of 3.0 MT CO_2e/SP/year. When applying this threshold, the Project's air model indicates a potentially significant GHG impact. As previously stated, the IS/MND estimates that the Project would generate net annual GHG emissions of 2,038.8 MT CO_2e/year (p. 37, Table 7). According to CAPCOA's *CEQA & Climate Change* report, a service population ("SP") is defined as "the sum of the number of residents and the number of jobs supported by the project."[34] As the Project does not propose any residential land uses, we estimate that the Project would support 0 residents. Furthermore, according to the *Employment Density Study Summary Report* completed by the Southern California Association of Governments ("SCAG"), the Project would support approximately 174 employees.[35, 36] Based on this estimate, we estimate a SP of 174 people.[37] When dividing the Project's net annual GHG emissions, as estimated by the IS/MND, by an SP of 122 people, we find that the Project would emit approximately 11.7 MT CO_2e/SP/year (see table below).[38]

1A-13

IS/MND Greenhouse Gas Emissions	
Annual Emissions (MT CO_2e/year)	2,038.8
Service Population	174
Service Population Efficiency (MT CO_2e/SP/year)	11.7
SCAQMD 2035 Threshold	**3.0**
Exceeds?	***Yes***

As demonstrated above, the Project's service population efficiency value, as estimated by the IS/MND's provided net annual GHG emission estimates and SP, exceeds the SCAQMD 2035 efficiency target of 3.0 MT CO_2e/SP/year, indicating a potentially significant impact not previously identified or addressed by the IS/MND. As a result, the IS/MND's less-than-significant GHG impact conclusion should not be relied

[33] "Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #15." SCAQMD, September 2010, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf, p. 2.
[34] CAPCOA (Jan. 2008) CEQA & Climate Change, p. 71-72, http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA-White-Paper.pdf.
[35] Calculated: (208,000-SF warehouse) / (1,195-SF per one employee warehouse in San Bernardino County) = 174.06 employees.
[36] "Employment Density Study Summary Report." Southern California Association of Governments (SCAG), October 2001, *available at:* https://docplayer.net/30300085-Employment-density-study-summary-report-october-31-prepared-for-southern-california-association-of-governments.html, p. 4.
[37] Calculated: 0 residents + 174 employees = 174 service population.
[38] Calculated: (2,038.8 MT CO_2e/year) / (174 service population) = (11.71 MT CO_2e/SP/year).

upon. An EIR should be prepared, including an updated GHG analysis and incorporating additional mitigation measures to reduce the Project's GHG emissions to less-than-significant levels. 1A-13 Cont.

Mitigation

Feasible Mitigation Measures Available to Reduce Emissions

Our analysis demonstrates that the Project would result in potentially significant air quality, health risk, and GHG impacts that should be mitigated further. As such, in an effort to reduce the Project's emissions, we identified several mitigation measures that are applicable to the proposed Project. Feasible mitigation measures can be found in the California Department of Justice Warehouse Project Best Practices document.[39] Therefore, to reduce the Project's emissions, consideration of the following measures should be made:

- Requiring off-road construction equipment to be hybrid electric-diesel or zero emission, where available, and all diesel-fueled off-road construction equipment to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.
- Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.
- Using electric-powered hand tools, forklifts, and pressure washers, and providing electrical hook ups to the power grid rather than use of diesel-fueled generators to supply their power. 1A-14
- Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.
- Limiting the amount of daily grading disturbance area.
- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.
- Forbidding idling of heavy equipment for more than three minutes.
- Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.
- Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.
- Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.
- Providing information on transit and ridesharing programs and services to construction employees.

[39] "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." State of California Department of Justice, September 2022, *available at*: https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf, p. 8 – 10.

- Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.
- Requiring all heavy-duty vehicles engaged in drayage to or from the project site to be zero-emission beginning in 2030.
- Requiring all on-site motorized operational equipment, such as forklifts and yard trucks, to be zero-emission with the necessary charging or fueling stations provided.
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
- Forbidding trucks from idling for more than three minutes and requiring operators to turn off engines when not in use.
- Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the local air district, and the building manager.
- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building's projected energy needs, including all electrical chargers.
- Designing all project building roofs to accommodate the maximum future coverage of solar panels and installing the maximum solar power generation capacity feasible.
- Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.
- Running conduit to designated locations for future electric truck charging stations.
- Unless the owner of the facility records a covenant on the title of the underlying property ensuring that the property cannot be used to provide refrigerated warehouse space, constructing electric plugs for electric transport refrigeration units at every dock door and requiring truck operators with transport refrigeration units to use the electric plugs when at loading docks.
- Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability.
- Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces (for example, requiring at least 10% of all employee parking spaces to be equipped with electric vehicle charging stations of at least Level 2 charging performance)
- Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the

1A-14 Cont.

affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.

- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.
- Designing to LEED green building certification standards.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations.
- Posting signs at every truck exit driveway providing directional information to the truck route.
- Improving and maintaining vegetation and tree canopy for residents in and around the project area.
- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants who own, operate, or hire trucking carriers with more than 100 trucks to use carriers that are SmartWay carriers.
- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

1A-14 Cont.

These measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently, reduce emissions released during Project construction and operation.

Furthermore, as it is policy of the State that eligible renewable energy resources and zero-carbon resources supply 100% of retail sales of electricity to California end-use customers by December 31, 2045, we emphasize the applicability of incorporating solar power system into the Project design. Until the feasibility of incorporating on-site renewable energy production is considered, the Project should not be approved.

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A revised EIR should be prepared to include all feasible mitigation measures, as well as include updated air quality, health risk, and GHG analyses to ensure that the necessary mitigation measures are implemented to reduce emissions to below thresholds. The revised EIR should also demonstrate a commitment to the implementation of these measures prior to Project approval, to ensure that the Project's significant emissions are reduced to the maximum extent possible.

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Disclaimer

SWAPE has received limited discovery regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

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Sincerely,

Matt Hagemann, P.G., C.Hg.

Paul E. Rosenfeld, Ph.D.

Attachment A: Updated CalEEMod Output Files
Attachment B: Matt Hagemann CV
Attachment C: Paul Rosenfeld CV

Attachment A

Almond Industrial Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Almond Industrial
Lead Agency	San Bernardino County
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.50
Precipitation (days)	24.0
Location	27195 Almond Ave, Redlands, CA 92374, USA
County	San Bernardino-South Coast
City	Unincorporated
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	5393
EDFZ	10
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Unrefrigerated Warehouse-No Rail	208	1000sqft	4.78	208,000	42,817	—	—	—
Parking Lot	165	Space	1.48	0.00	—	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.15	1.77	13.6	22.0	0.03	0.57	1.43	2.00	0.52	0.35	0.87	—	4,761	4,761	0.24	0.22	8.48	4,842
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.80	97.6	39.9	36.7	0.05	1.81	19.9	21.7	1.66	10.2	11.8	—	5,531	5,531	0.24	0.22	0.22	5,552
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.66	5.51	11.5	15.0	0.02	0.49	1.76	2.24	0.45	0.67	1.12	—	3,174	3,174	0.16	0.13	2.15	3,220
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.30	1.01	2.09	2.74	< 0.005	0.09	0.32	0.41	0.08	0.12	0.20	—	526	526	0.03	0.02	0.36	533

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2023	2.15	1.77	13.6	22.0	0.03	0.57	1.43	2.00	0.52	0.35	0.87	—	4,761	4,761	0.24	0.22	8.48	4,842
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	4.80	4.04	39.9	36.7	0.05	1.81	19.9	21.7	1.66	10.2	11.8	—	5,531	5,531	0.24	0.22	0.22	5,552
2024	2.02	97.6	13.0	19.4	0.03	0.51	1.43	1.95	0.47	0.35	0.82	—	4,620	4,620	0.23	0.22	0.21	4,692
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	1.66	1.37	11.5	15.0	0.02	0.49	1.76	2.24	0.45	0.67	1.12	—	3,174	3,174	0.16	0.13	2.15	3,220
2024	0.20	5.51	1.33	2.00	< 0.005	0.06	0.11	0.17	0.05	0.03	0.08	—	413	413	0.02	0.02	0.27	419
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.30	0.25	2.09	2.74	< 0.005	0.09	0.32	0.41	0.08	0.12	0.20	—	526	526	0.03	0.02	0.36	533
2024	0.04	1.01	0.24	0.37	< 0.005	0.01	0.02	0.03	0.01	0.01	0.01	—	68.4	68.4	< 0.005	< 0.005	0.04	69.3

3. Construction Emissions Details

3.1. Demolition (2023) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.39	2.84	27.3	23.5	0.03	1.20	—	1.20	1.10	—	1.10	—	3,425	3,425	0.14	0.03	—	3,437
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.19	0.16	1.50	1.29	< 0.005	0.07	—	0.07	0.06	—	0.06	—	188	188	0.01	< 0.005	—	188
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.03	0.27	0.23	< 0.005	0.01	—	0.01	0.01	—	0.01	—	31.1	31.1	< 0.005	< 0.005	—	31.2
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.09	1.04	0.00	0.00	0.01	0.01	0.00	0.00	0.00	—	202	202	0.01	0.01	0.02	204
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.06	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	11.2	11.2	< 0.005	< 0.005	0.02	11.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	1.86	1.86	< 0.005	< 0.005	< 0.005	1.88
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Site Preparation (2023) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.70	3.95	39.7	35.5	0.05	1.81	—	1.81	1.66	—	1.66	—	5,295	5,295	0.21	0.04	—	5,314
Dust From Material Movement	—	—	—	—	—	—	19.7	19.7	—	10.1	10.1	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	0.11	1.09	0.97	< 0.005	0.05	—	0.05	0.05	—	0.05	—	145	145	0.01	< 0.005	—	146
Dust From Material Movement	—	—	—	—	—	—	0.54	0.54	—	0.28	0.28	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.20	0.18	< 0.005	0.01	—	0.01	0.01	—	0.01	—	24.0	24.0	< 0.005	< 0.005	—	24.1
Dust From Material Movement	—	—	—	—	—	—	0.10	0.10	—	0.05	0.05	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.11	1.22	0.00	0.00	0.01	0.01	0.00	0.00	0.00	—	236	236	0.01	0.01	0.03	238
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	6.55	6.55	< 0.005	< 0.005	0.01	6.64
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	1.08	1.08	< 0.005	< 0.005	< 0.005	1.10
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Grading (2023) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.43	2.04	20.0	19.7	0.03	0.94	—	0.94	0.87	—	0.87	—	2,958	2,958	0.12	0.02	—	2,968
Dust From Material Movement	—	—	—	—	—	—	7.08	7.08	—	3.42	3.42	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	0.11	1.09	1.08	< 0.005	0.05	—	0.05	0.05	—	0.05	—	162	162	0.01	< 0.005	—	163
Dust From Material Movement	—	—	—	—	—	—	0.39	0.39	—	0.19	0.19	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.20	0.20	< 0.005	0.01	—	0.01	0.01	—	0.01	—	26.8	26.8	< 0.005	< 0.005	—	26.9
Dust From Material Movement	—	—	—	—	—	—	0.07	0.07	—	0.03	0.03	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.09	1.04	0.00	0.00	0.01	0.01	0.00	0.00	0.00	—	202	202	0.01	0.01	0.02	204
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.06	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	11.2	11.2	< 0.005	< 0.005	0.02	11.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	1.86	1.86	< 0.005	< 0.005	< 0.005	1.88
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2023) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.50	1.26	11.8	13.2	0.02	0.55	—	0.55	0.51	—	0.51	—	2,397	2,397	0.10	0.02	—	2,406

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.50	1.26	11.8	13.2	0.02	0.55	—	0.55	0.51	—	0.51	—	2,397	2,397	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.85	0.71	6.70	7.47	0.01	0.31	—	0.31	0.29	—	0.29	—	1,361	1,361	0.06	0.01	—	1,365
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	0.13	1.22	1.36	< 0.005	0.06	—	0.06	0.05	—	0.05	—	225	225	0.01	< 0.005	—	226
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.53	0.48	0.46	8.09	0.00	0.00	0.07	0.07	0.00	0.00	0.00	—	1,283	1,283	0.05	0.04	5.50	1,303
Vendor	0.12	0.03	1.28	0.69	0.01	0.02	0.06	0.08	0.02	0.02	0.04	—	1,080	1,080	0.09	0.16	2.98	1,133
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.50	0.45	0.54	6.08	0.00	0.00	0.07	0.07	0.00	0.00	0.00	—	1,176	1,176	0.06	0.04	0.14	1,190
Vendor	0.12	0.03	1.33	0.70	0.01	0.02	0.06	0.08	0.02	0.02	0.04	—	1,081	1,081	0.09	0.16	0.08	1,131
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.28	0.25	0.31	3.65	0.00	0.00	0.04	0.04	0.00	0.00	0.00	—	677	677	0.03	0.02	1.35	686
Vendor	0.07	0.02	0.76	0.40	< 0.005	0.01	0.03	0.04	0.01	0.01	0.02	—	613	613	0.05	0.09	0.73	642
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.06	0.67	0.00	0.00	0.01	0.01	0.00	0.00	0.00	—	112	112	0.01	< 0.005	0.22	114
Vendor	0.01	< 0.005	0.14	0.07	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	102	102	0.01	0.01	0.12	106
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Building Construction (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.44	1.20	11.2	13.1	0.02	0.50	—	0.50	0.46	—	0.46	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.08	0.72	0.85	< 0.005	0.03	—	0.03	0.03	—	0.03	—	155	155	0.01	< 0.005	—	155
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.02	0.01	0.13	0.15	< 0.005	0.01	—	0.01	0.01	—	0.01	—	25.6	25.6	< 0.005	< 0.005	—	25.7
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.48	0.43	0.50	5.58	0.00	0.00	0.07	0.07	0.00	0.00	0.00	—	1,153	1,153	0.05	0.04	0.13	1,167
Vendor	0.11	0.03	1.28	0.67	0.01	0.02	0.06	0.08	0.02	0.02	0.04	—	1,069	1,069	0.08	0.16	0.08	1,119
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.03	0.38	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	75.5	75.5	< 0.005	< 0.005	0.14	76.6
Vendor	0.01	< 0.005	0.08	0.04	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	69.0	69.0	0.01	0.01	0.08	72.3
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.07	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	12.5	12.5	< 0.005	< 0.005	0.02	12.7
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	11.4	11.4	< 0.005	< 0.005	0.01	12.0
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Paving (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.01	0.85	7.81	10.0	0.01	0.39	—	0.39	0.36	—	0.36	—	1,512	1,512	0.06	0.01	—	1,517
Paving	—	0.19	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.05	0.43	0.55	< 0.005	0.02	—	0.02	0.02	—	0.02	—	82.8	82.8	< 0.005	< 0.005	—	83.1
Paving	—	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.08	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.7	13.7	< 0.005	< 0.005	—	13.8
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.09	0.96	0.00	0.00	0.01	0.01	0.00	0.00	0.00	—	198	198	0.01	0.01	0.02	200
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.06	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	11.0	11.0	< 0.005	< 0.005	0.02	11.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	1.82	1.82	< 0.005	< 0.005	< 0.005	1.85
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Architectural Coating (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.17	0.14	0.91	1.15	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	—	97.3	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.01	0.01	0.05	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.32	7.32	< 0.005	< 0.005	—	7.34
Architectural Coatings	—	5.33	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.21	1.21	< 0.005	< 0.005	—	1.22
Architectural Coatings	—	0.97	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.10	1.12	0.00	0.00	0.01	0.01	0.00	0.00	0.00	—	231	231	0.01	0.01	0.03	233
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	< 0.005	0.01	0.06	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	12.8	12.8	< 0.005	< 0.005	0.02	13.0
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	2.12	2.12	< 0.005	< 0.005	< 0.005	2.15

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	1/3/2023	1/31/2023	5.00	20.0	—
Site Preparation	Site Preparation	2/1/2023	2/15/2023	5.00	10.0	—
Grading	Grading	2/16/2023	3/16/2023	5.00	20.0	—
Building Construction	Building Construction	3/17/2023	2/2/2024	5.00	230	—
Paving	Paving	2/3/2024	3/2/2024	5.00	20.0	—
Architectural Coating	Architectural Coating	3/3/2024	3/31/2024	5.00	20.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Rubber Tired Dozers	Diesel	Average	2.00	8.00	367	0.40
Demolition	Excavators	Diesel	Average	3.00	8.00	36.0	0.38
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Grading	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	84.0	0.37
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	15.0	18.5	LDA,LDT1,LDT2
Demolition	Vendor	—	10.2	HHDT,MHDT
Demolition	Hauling	0.00	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	15.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	87.4	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	34.1	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	18.5	LDA,LDT1,LDT2
Paving	Vendor	—	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—

Architectural Coating	Worker	17.5	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	312,000	104,000	3,881

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	—	—
Site Preparation	—	—	15.0	0.00	—
Grading	—	—	20.0	0.00	—
Paving	0.00	0.00	0.00	0.00	1.48

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Unrefrigerated Warehouse-No Rail	0.00	0%
Parking Lot	1.48	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2023	0.00	532	0.03	< 0.005
2024	0.00	532	0.03	< 0.005

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	26.6	annual days of extreme heat
Extreme Precipitation	4.20	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	6.46	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider different increments of sea level rise coupled with extreme storm events. Users may select from four model simulations to view the range in potential inundation depth for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 50 meters (m) by 50 m, or about 164 feet (ft) by 164 ft.
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	3	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A

Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	3	1	1	3
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract

Exposure Indicators	—
AQ-Ozone	100
AQ-PM	57.4
AQ-DPM	82.8
Drinking Water	96.3
Lead Risk Housing	29.2
Pesticides	74.7
Toxic Releases	44.2
Traffic	81.0
Effect Indicators	—
CleanUp Sites	81.9
Groundwater	47.6
Haz Waste Facilities/Generators	96.8
Impaired Water Bodies	12.5
Solid Waste	0.00
Sensitive Population	—
Asthma	34.7
Cardio-vascular	45.1
Low Birth Weights	75.6
Socioeconomic Factor Indicators	—
Education	39.2
Housing	89.1
Linguistic	17.3
Poverty	55.9
Unemployment	14.4

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	37.76466059
Employed	27.51186963
Median HI	26.53663544
Education	—
Bachelor's or higher	60.5800077
High school enrollment	100
Preschool enrollment	11.52316181
Transportation	—
Auto Access	62.47914795
Active commuting	28.56409598
Social	—
2-parent households	37.02040293
Voting	39.83061722
Neighborhood	—
Alcohol availability	30.07827538
Park access	50.53252919
Retail density	65.94379571
Supermarket access	72.28281791
Tree canopy	43.62889773
Housing	—
Homeownership	9.303220839
Housing habitability	37.12305916
Low-inc homeowner severe housing cost burden	73.38637239
Low-inc renter severe housing cost burden	66.31592455
Uncrowded housing	31.19466188

Health Outcomes	—
Insured adults	48.58206082
Arthritis	92.2
Asthma ER Admissions	65.8
High Blood Pressure	95.2
Cancer (excluding skin)	82.6
Asthma	30.0
Coronary Heart Disease	94.7
Chronic Obstructive Pulmonary Disease	71.2
Diagnosed Diabetes	92.6
Life Expectancy at Birth	79.7
Cognitively Disabled	52.2
Physically Disabled	60.6
Heart Attack ER Admissions	32.7
Mental Health Not Good	41.5
Chronic Kidney Disease	95.6
Obesity	56.2
Pedestrian Injuries	53.3
Physical Health Not Good	67.2
Stroke	91.3
Health Risk Behaviors	—
Binge Drinking	13.6
Current Smoker	36.3
No Leisure Time for Physical Activity	67.1
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0

Children	7.3
Elderly	81.9
English Speaking	84.0
Foreign-born	37.0
Outdoor Workers	85.1
Climate Change Adaptive Capacity	—
Impervious Surface Cover	69.4
Traffic Density	74.6
Traffic Access	23.0
Other Indices	—
Hardship	54.2
Other Decision Support	—
2016 Voting	58.0

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	72.0
Healthy Places Index Score for Project Location (b)	32.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

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Investigation and Remediation Strategies
Litigation Support and Testifying Expert
Industrial Stormwater Compliance
CEQA Review

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certifications:

California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

Professional Experience:

Matt has 30 years of experience in environmental policy, contaminant assessment and remediation, stormwater compliance, and CEQA review. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) and directed efforts to improve hydrogeologic characterization and water quality monitoring. For the past 15 years, as a founding partner with SWAPE, Matt has developed extensive client relationships and has managed complex projects that include consultation as an expert witness and a regulatory specialist, and a manager of projects ranging from industrial stormwater compliance to CEQA review of impacts from hazardous waste, air quality and greenhouse gas emissions.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2104, 2017;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt's responsibilities have included:

- Lead analyst and testifying expert in the review of over 300 environmental impact reports and negative declarations since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at more than 100 industrial facilities.
- Expert witness on numerous cases including, for example, perfluorooctanoic acid (PFOA) contamination of groundwater, MTBE litigation, air toxins at hazards at a school, CERCLA compliance in assessment and remediation, and industrial stormwater contamination.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.

With Komex H2O Science Inc., Matt's duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.
- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted

public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9.

Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific

principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt is currently a part time geology instructor at Golden West College in Huntington Beach, California where he taught from 2010 to 2014 and in 2017.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Coloradao.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal repesentatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F**. 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examinations, 2009-2011.

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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Paul Rosenfeld, Ph.D.

Chemical Fate and Transport & Air Dispersion Modeling

Principal Environmental Chemist

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Focus on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years of experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, industrial, military and agricultural sources, unconventional oil drilling operations, and locomotive and construction engines. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities. Dr. Rosenfeld has also successfully modeled exposure to contaminants distributed by water systems and via vapor intrusion.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, creosote, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at sites and has testified as an expert witness on numerous cases involving exposure to soil, water and air contaminants from industrial, railroad, agricultural, and military sources.

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H_2O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

Rosenfeld P. E., Spaeth K., Hallman R., Bressler R., Smith, G., (2022) Cancer Risk and Diesel Exhaust Exposure Among Railroad Workers. *Water Air Soil Pollution.* **233,** 171.

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health.* 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P**., (2015) Modeling the Effect of Refinery Emission On Residential Property Value. Journal of Real Estate Research. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.,** Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermod and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

Rosenfeld, P.E. & Feng, L. (2011). *The Risks of Hazardous Waste.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences*. 113–125.

Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry*. Amsterdam: Elsevier Publishing.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution,* 123 (17), 319-327.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, 70, 000527-000530.

Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

Rosenfeld, P.E., J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

Rosenfeld, P. E., M. Suffet. (2007). The Anatomy Of Odour Wheels For Odours Of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities.* Boston Massachusetts: Elsevier Publishing

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

Rosenfeld P. E., J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme For The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004.* New Orleans, October 2-6, 2004.

Rosenfeld, P.E., and Suffet, I.H. (2004). Understanding Odorants Associated With Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49(9), 171-178.

Rosenfeld, P. E., Grey, M. A., Sellew, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

Rosenfeld, P.E., Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office*, Publications Clearinghouse (MS–6), Sacramento, CA Publication #442-02-008.

Rosenfeld, P.E., and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

Rosenfeld, P.E., and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality.* 29, 1662-1668.

Rosenfeld, P.E., C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

Rosenfeld, P.E., and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

Rosenfeld, P.E., and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld. (**1998). Compost Amendment Handbook For Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

Rosenfeld, P. E. (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

Rosenfeld, P. E. (1993). High School Biogas Project to Prevent Deforestation On St. Kitts. *Biomass Users Network*, 7(1).

Rosenfeld, P. E. (1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

Rosenfeld, P. E. (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

Rosenfeld, P. E. (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

Presentations:

Rosenfeld, P.E., "The science for Perfluorinated Chemicals (PFAS): What makes remediation so hard?" Law Seminars International, (May 9-10, 2018) 800 Fifth Avenue, Suite 101 Seattle, WA.

Rosenfeld, P.E., Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society.* Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution.* Lecture conducted from Boston, MA.

Rosenfeld, P.E. (April 19-23, 2009). Perfluoroctanoic Acid (PFOA) and Perfluoroactane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

Rosenfeld, P.E. (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

Rosenfeld, P. E. (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water.* Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. The *23rd Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld P. E. (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

Rosenfeld P. E. (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting.* Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition.* Lecture conducted from Boston Massachusetts.

Paul Rosenfeld Ph.D. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference.* Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

Paul Rosenfeld Ph.D. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

Paul Rosenfeld Ph.D. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference.* Lecture conducted from Hilton Hotel in Irvine, California.

Paul Rosenfeld Ph.D. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference.* Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

Paul Rosenfeld Ph.D. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference.* Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

Paul Rosenfeld, Ph.D. (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants*.. Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

Paul Rosenfeld, Ph.D. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conferenc*e. Lecture conducted from Indianapolis, Maryland.

Rosenfeld. P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation.* Lecture conducted from Anaheim California.

Rosenfeld. P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest.* Lecture conducted from Ocean Shores, California.

Rosenfeld, P.E. (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell.* Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest.* Lecture conducted from Lake Chelan, Washington.

Rosenfeld, P.E, C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

Academic Grants Awarded:

California Integrated Waste Management Board. $41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: $10,000 grant awarded to San Diego State University.
Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. $100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. $20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: $10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: $15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. $500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

Deposition and/or Trial Testimony:

In the Superior Court of the State of California, County of San Bernardino
Billy Wildrick, Plaintiff vs. BNSF Railway Company
Case No. CIVDS1711810
Rosenfeld Deposition 10-17-2022

In the State Court of Bibb County, State of Georgia
Richard Hutcherson, Plaintiff vs Norfolk Southern Railway Company
Case No. 10-SCCV-092007
Rosenfeld Deposition 10-6-2022

In the Civil District Court of the Parish of Orleans, State of Louisiana
Millard Clark, Plaintiff vs. Dixie Carriers, Inc. et al.
Case No. 2020-03891
Rosenfeld Deposition 9-15-2022

In The Circuit Court of Livingston County, State of Missouri, Circuit Civil Division
Shirley Ralls, Plaintiff vs. Canadian Pacific Railway and Soo Line Railroad
Case No. 18-LV-CC0020
Rosenfeld Deposition 9-7-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jonny C. Daniels, Plaintiff vs. CSX Transportation Inc.
Case No. 20-CA-5502
Rosenfeld Deposition 9-1-2022

In The Circuit Court of St. Louis County, State of Missouri
Kieth Luke et. al. Plaintiff vs. Monsanto Company et. al.
Case No. 19SL-CC03191
Rosenfeld Deposition 8-25-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jeffery S. Lamotte, Plaintiff vs. CSX Transportation Inc.
Case No. NO. 20-CA-0049
Rosenfeld Deposition 8-22-2022

In State of Minnesota District Court, County of St. Louis Sixth Judicial District
Greg Bean, Plaintiff vs. Soo Line Railroad Company
Case No. 69-DU-CV-21-760
Rosenfeld Deposition 8-17-2022

In United States District Court Western District of Washington at Tacoma, Washington
John D. Fitzgerald Plaintiff vs. BNSF
Case No. 3:21-cv-05288-RJB
Rosenfeld Deposition 8-11-2022

In Circuit Court of the Sixth Judicial Circuit, Macon Illinois
Rocky Bennyhoff Plaintiff vs. Norfolk Southern
Case No. 20-L-56
Rosenfeld Deposition 8-3-2022

In Court of Common Pleas, Hamilton County Ohio
Joe Briggins Plaintiff vs. CSX
Case No. A2004464
Rosenfeld Deposition 6-17-2022

In the Superior Court of the State of California, County of Kern
George LaFazia vs. BNSF Railway Company.
Case No. BCV-19-103087
Rosenfeld Deposition 5-17-2022

In the Circuit Court of Cook County Illinois
Bobby Earles vs. Penn Central et. al.
Case No. 2020-L-000550
Rosenfeld Deposition 4-16-2022

In United States District Court Easter District of Florida
Albert Hartman Plaintiff vs. Illinois Central
Case No. 2:20-cv-1633
Rosenfeld Deposition 4-4-2022

In the Circuit Court of the 4th Judicial Circuit, in and For Duval County, Florida
Barbara Steele vs. CSX Transportation
Case No.16-219-Ca-008796
Rosenfeld Deposition 3-15-2022

In United States District Court Easter District of New York
Romano et al. vs. Northrup Grumman Corporation
Case No. 16-cv-5760
Rosenfeld Deposition 3-10-2022

In the Circuit Court of Cook County Illinois
Linda Benjamin vs. Illinois Central
Case No. No. 2019 L 007599
Rosenfeld Deposition 1-26-2022

In the Circuit Court of Cook County Illinois
Donald Smith vs. Illinois Central
Case No. No. 2019 L 003426
Rosenfeld Deposition 1-24-2022

In the Circuit Court of Cook County Illinois
Jan Holeman vs. BNSF
Case No. 2019 L 000675
Rosenfeld Deposition 1-18-2022

In the State Court of Bibb County State of Georgia
Dwayne B. Garrett vs. Norfolk Southern
Case No. 20-SCCV-091232
Rosenfeld Deposition 11-10-2021

In the Circuit Court of Cook County Illinois
Joseph Ruepke vs. BNSF
Case No. 2019 L 007730
Rosenfeld Deposition 11-5-2021

In the United States District Court For the District of Nebraska
Steven Gillett vs. BNSF
Case No. 4:20-cv-03120
Rosenfeld Deposition 10-28-2021

In the Montana Thirteenth District Court of Yellowstone County
James Eadus vs. Soo Line Railroad and BNSF
Case No. DV 19-1056
Rosenfeld Deposition 10-21-2021

In the Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al.cvs. Cerro Flow Products, Inc.
Case No. 0i9-L-2295
Rosenfeld Deposition 5-14-2021
Trial October 8-4-2021

In the Circuit Court of Cook County Illinois
Joseph Rafferty vs. Consolidated Rail Corporation and National Railroad Passenger Corporation d/b/a AMTRAK,
Case No. 18-L-6845
Rosenfeld Deposition 6-28-2021

In the United States District Court For the Northern District of Illinois
Theresa Romcoe vs. Northeast Illinois Regional Commuter Railroad Corporation d/b/a METRA Rail
Case No. 17-cv-8517
Rosenfeld Deposition 5-25-2021

In the Superior Court of the State of Arizona In and For the Cunty of Maricopa
Mary Tryon et al. vs. The City of Pheonix v. Cox Cactus Farm, L.L.C., Utah Shelter Systems, Inc.
Case No. CV20127-094749
Rosenfeld Deposition 5-7-2021

In the United States District Court for the Eastern District of Texas Beaumont Division
Robinson, Jeremy et al vs. CNA Insurance Company et al.
Case No. 1:17-cv-000508
Rosenfeld Deposition 3-25-2021

In the Superior Court of the State of California, County of San Bernardino
Gary Garner, Personal Representative for the Estate of Melvin Garner vs. BNSF Railway Company.
Case No. 1720288
Rosenfeld Deposition 2-23-2021

In the Superior Court of the State of California, County of Los Angeles, Spring Street Courthouse
Benny M Rodriguez vs. Union Pacific Railroad, A Corporation, et al.
Case No. 18STCV01162
Rosenfeld Deposition 12-23-2020

In the Circuit Court of Jackson County, Missouri
Karen Cornwell, Plaintiff, vs. Marathon Petroleum, LP, Defendant.
Case No. 1716-CV10006
Rosenfeld Deposition 8-30-2019

In the United States District Court For The District of New Jersey
Duarte et al, Plaintiffs, vs. United States Metals Refining Company et. al. Defendant.
Case No. 2:17-cv-01624-ES-SCM
Rosenfeld Deposition 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS "Conti Perdido" Defendant.
Case No. 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No. BC615636
Rosenfeld Deposition 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No. BC646857
Rosenfeld Deposition 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiffs vs. The 3M Company et al., Defendants
Case No. 1:16-cv-02531-RBJ
Rosenfeld Deposition 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants
Cause No. 1923
Rosenfeld Deposition 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintifs vs. Chevron Corporation, et al., Defendants
Cause No. C12-01481
Rosenfeld Deposition 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition 8-23-2017

In United States District Court For The Southern District of Mississippi
Guy Manuel vs. The BP Exploration et al., Defendants
Case No. 1:19-cv-00315-RHW
Rosenfeld Deposition 4-22-2020

In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No. LC102019 (c/w BC582154)
Rosenfeld Deposition 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., Plaintiffs, vs. Meritor Inc., et al., Defendants
Case No. 4:16-cv-52-DMB-JVM
Rosenfeld Deposition July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No. RG14711115
Rosenfeld Deposition September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No. LALA002187
Rosenfeld Deposition August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action No. 14-C-30000
Rosenfeld Deposition June 2015

In The Iowa District Court for Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No. 4980
Rosenfeld Deposition May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case No. CACE07030358 (26)
Rosenfeld Deposition December 2014

In the County Court of Dallas County Texas
Lisa Parr et al, Plaintiff, vs. Aruba et al, Defendant.
Case No. cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial April 2014

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., Plaintiffs, vs. Republic Services, Inc., et al., Defendants
Case No. 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition October 2012

In the United States District Court for the Middle District of Alabama, Northern Division
James K. Benefield, et al., Plaintiffs, vs. International Paper Company, Defendant.
Civil Action No. 2:09-cv-232-WHA-TFM
Rosenfeld Deposition July 2010, June 2011

In the Circuit Court of Jefferson County Alabama
Jaeanette Moss Anthony, et al., Plaintiffs, vs. Drummond Company Inc., et al., Defendants
Civil Action No. CV 2008-2076
Rosenfeld Deposition September 2010

In the United States District Court, Western District Lafayette Division
Ackle et al., Plaintiffs, vs. Citgo Petroleum Corporation, et al., Defendants.
Case No. 2:07CV1052
Rosenfeld Deposition July 2009

RESPONSES TO COMMENT LETTER 1
BLUM COLLINS & HO, LLP
On Behalf of GOLDEN STATE ENVIRONMENTAL JUSTICE ALLIANCE
DATED JANUARY 10, 2023
Almond Avenue Warehouse MND
(SCH# 2022120196)

Response to Comment 1-1

Introductory comment stating that Blum Collins & Ho, LLP is submitting comments on behalf of Golden State Environmental Justice Alliance (GSEJA). Because no comment to the Initial Study/Mitigated Negative Declaration (IS/MND) is made, no response is required.

Response to Comment 1-2

This is a summary comment reiterating the Project Description as provided in the Initial Study (IS). No response is required.

Response to Comment 1-3

Comment claims the MND does not contain a detailed site plan, floor plan, building elevations, or conceptual grading plan and that the Site Plan figure included in the IS has been edited. As noted in the comment, these plans comprise basic components of a Planning Application and therefore they have been provided to the County throughout the application process and are available upon request as part of the public record. The applicable information from these plans has been referred to where pertinent to provide accurate analyses in the CEQA document. For example, the building heights which are shown on the elevation exhibits, are discussed where analysis is required in the aesthetics and hazards sections. Additionally, the plan included as Figure 3 in the IS was not edited to delete pertinent information from the public view. The County therefore disagrees that an EIR is required to include the detailed plans which are part of the Project Application and subject to the IS/MND review in compliance with CEQA.

Response to Comment 1-4

Comment is that the MND does not state if existing zoning permits agricultural use or if the site is under a Williamson Act contract. On page 15 it is stated that no land within 0.25 miles of the project site occurs within a protected land resource (i.e., under Williamson Act Contract); the Project Site is within 0.25 miles of itself and therefore the Project Site is not under a Williamson Act contract.

Page 15 of the IS also states that the Project Site is currently zoned East Valley/Special Development EV/SD and is currently an orange grove. The Proposed Project does not conflict with the existing zoning; no general plan amendment or zone change is required for approval of the project. The IS/MND's conclusions are supported by substantial evidence and no additional analysis is required.

Response to Comment 1-5

Comment refers to an attachment to Letter 1 from SWAPE for technical commentary on Air Quality, Energy, and Greenhouse Gas Emissions. Those comments are addressed as Responses to Letter 1A.

Response to Comment 1-6

Commenter states that the MND does not include analysis of relevant environmental justice issues. Although the Countywide Plan/Policy Plan 2020 has identified Environmental Justice Focus Areas (EJFAs), EJFAs have not been singled out as a resource requiring separate analysis per 2022 CEQA Guidelines. The County agrees that there is no mention of environmental justice policies as the Project Site is not within one of the County-designated (EJFAs).[1] There is however adequate analysis of potential environmental

[1] HZ-10 Envir. Justice & Legacy Communities (arcgis.com)

impacts to the general public as well as any nearby sensitive receptors where appropriate per current CEQA guidelines.

Response to Comment 1-7

Commenter points out that disadvantaged community census tracts as defined by the California Office of Environmental Health Hazard Assessment (OEHHA) are located adjacent to the north, east and west of the project site. Upon accessing the cited website, we find those referenced census tracts are not adjacent to the Project Site. The easternmost is approximately 0.6 miles from the nearest Project Site boundary and on the other side of SR-210; the northernmost is approximately 1.9 miles away and across the Santa Ana River; and the westerly is 1.75 miles away. Residents of these census tracts have been determined to be negatively impacted by the saturation of the warehousing and logistics industry in the County.

Therefore, a Health Risk Assessment Analysis (HRA) dated October 5, 2022 was prepared for the Proposed Project by Ganddini Group Inc. The HRA was performed to address the possibility of cancer and non-cancer risk for nearby sensitive receptors from project-related diesel emissions (see pages 19 – 20 of Initial Study). According to the HRA, the highest cancer risk corresponds to Receptor 1, with a maximum risk of 0.151 in one million for infants (0-2 years). The maximum 3rd trimester (0.25-year) cancer risk is at Receptor 1; with a maximum cancer risk of 0.011 in a million. The highest child (2-16 years) cancer risk is at Receptor 1; with a maximum risk of 0.141 in one million and the highest adult (16-30 years) cancer risk is at Receptor 1; with a maximum risk of 0.014 in one million. Therefore, no children or infants are exposed to cancer risks in excess of the OEHHA threshold of 10 in one million.

The referenced OEHHA website indicates that in May 2022, CalEPA released its updated designation of disadvantages communities for the purpose of SB 535. This designation went into effect on July 1, 2022, at which point programs funded through California Climate Investments will use the designation in making funding decisions. California Climate Investments are funds (Greenhouse Gas Reduction Fund and appropriated by the Legislature) from the proceeds of the State's Cap-and-Trade Program specifically targeted for investment in disadvantaged communities in California to further reduce emissions of greenhouse gases.

The IS/MND's conclusions are supported by substantial evidence and no additional analysis is required.

Response to Comment 1-8

Commenter states that the use of CalEEMod for modeling "energy impacts in compliance with Title 24" is inaccurate or inadequate. The comment refers to California's Building Energy Code Compliance Software (CBECC) as being the State's only approved energy compliance software for non-residential buildings in compliance with Title 24. The County disagrees. Use of the CBECC is not a requirement of CEQA nor the County. The use of CalEEMod to estimate a project's energy consumption and use in comparing it to the appropriate energy provider's availability of supply is appropriate for answering the CEQA checklist questions related to inefficient or wasteful use of energy.

Response to Comment 1-9

Commenter states that no building elevations are provided that state the building height. Further, a review by the Federal Aviation Administration (FAA) is required and an EIR must be prepared. However, Page 11 of the Initial Study incorrectly states that under the EV/SD Zone, structures of the Proposed Project cannot exceed 35 feet. The building height shall be determined in accordance with Part 77 of the FAA regulations as shown below from the East Valley Area Plan. The Building Plans submitted to the County include elevations showing the maximum building height as 51'.

EV/SD	PLANNED DEVELOPMENT (EV/SD) DISTRICT DEVELOPMENT STANDARDS For Interim Uses listed in Subsection EV.0240 (b)(1)	
Maximum Structure Height (ft.)		See (1) below
Minimum Lot Size (acres)	map suffix will modify	20
Maximum Lot Coverage (building coverage)		N/A
Maximum Lot Dimensions (width to depth ratio)	> 10 acres < 10 acres	N/A
Minimum Lot Dimensions (width/depth in ft.)		N/A
Front Yard Setback (ft.) See (2) below		25
Side Yard Setbacks (ft.)		20
Rear Yard Setbacks (ft.)		20
Street Side Yard Setbacks (ft.) See (2) below		25
Maximum Floor Area Ratio (FAR - fl. area/lot area)		See Section EV.0330(h)(1)
Minimum District Size (acres)		N/A

(1) No maximum building height is established. Height limits shall be determined in accordance with Part 77 of the FAA regulations.

(2) Where front or side street is designated as a Special Landscaped Street in Section EV.0320(g), see Section EV.0320(g) for setback and landscaping requirements.

Page 40 of the IS states that the Project Site is located within the airport safety review area for the San Bernardino International Airport and Redlands Municipal Airport. However, the Project Site is outside the ultimate noise contours for both airports. Additionally, the Project is consistent with existing land uses on adjacent parcels and will be built to a proposed height of 51 feet, which is compatible with heights of adjacent buildings. Because the project is within an AR3 Airport Safety Overlay, the Project Notice was provided to the appropriate officials of San Bernardino County International Airport as well as Redlands Municipal Airport on December 6, 2022. No comments were received. An augmented Planning Commission to include two Airport Commissioners will be required to assist in the decision-making process at the public hearing.

Response to Comment 1-10

Commenter states that a review by the San Bernardino International Airport/Redland Municipal Airport Zone AR3 – Airport Safety Review Area is required and an EIR must be prepared to include this information. The Project Site is located 1.9 miles south of the San Bernardino International Airport and 3.9 miles west of the Redlands Municipal Airport. The Project does not present a safety hazard to either the public or the environment and is consistent with surrounding land use. However as mentioned above Project Notices were sent to the appropriate individuals from San Bernardino International Airport and Redlands Municipal Airport. No comments were received. An augmented Planning Commission to include two Airport Commissioners will be required to assist in the decision-making process at the public hearing.

The Noise Study prepared for the project states that the San Bernardino International Airport noise contours provided in the Technical Memorandum prepared for the San Bernardino International Airport – Eastgate Air Cargo Facility – Aircraft Noise Contour Development (July 2019) shows that the proposed project is within the 60 dBA CNEL noise contour for the San Bernardino International Airport.[2] Furthermore, as shown on the Redlands Municipal Airport Land Use Compatibility Plan (ALUCP) Figure 3B, the project site is well outside of the 60 dBA CNEL noise contour for the Redlands Municipal Airport.[3]

The County has determined that a review by the FAA or the San Bernardino International Airport/Redland Municipal Airport Zone AR3 – Airport Safety Review Area is required. However, it is expected that no impacts would occur related to public or environmental safety. Project Notices were sent to the appropriate individuals from San Bernardino International Airport and Redlands Municipal Airport. No comments were received. The IS/MND's conclusions are supported by substantial evidence and no additional analysis is required. However, an augmented Planning Commission to include two Airport Commissioners will be required to assist in the decision-making process at the public hearing.

Response to Comment 1-11

This comment relates to the IS lacking a consistency analysis of the proposed project with applicable development standards, and that the floor area ratio (FAR) of the proposed building exceeds the County General Plan maximum FAR of 50% as 50.05% is proposed. The proposed building is designed at a FAR of 80% as shown on the site plans.

From the San Bernardino County East Valley Area Plan, EV.0330 – Site Design Standards and Guidelines

> (h) Architectural Guidelines (1) Floor Area Ratio is determined by dividing total gross leasable area in square feet by total lot area in square feet. For example, a 20,000 square foot building on a 40,000 square foot lot yields a Floor Area Ratio of .5).
>
> (D) Industrial buildings: 0.8 or 80% of the total lot area.

Therefore, the Proposed Project, with a lot size of 415,562 square feet is allowed a FAR of 0.8 or 332,560 square feet, as shown on the Site Plans submitted. The Applicant has applied for Approval of a Conditional Use Permit to allow for development a 208,000 SF warehouse building on approximately 9.54 acres.

Response to Comment 1-12

Commenter states that the project has a zoning designation of East Valley/Special Development (EV/SD). However, the County's General Plan states that the IC and IR Zones are the implementing zoning designation of the IL General Plan land use designation. An EIR must be prepared to clarify the applicable Zoning designation of the project site and its development standards. It appears that the SD designation in the Zoning Code is the most applicable to the site, which has a 50-foot height limit. Figure 3: Site Plan states that the maximum building height is "as determined in accordance with Part 77 of FAA Regulations." Commenter further states that there are no building elevations provided in the MND. An EIR must be prepared to include detailed building elevations.

The General Plan Land use is Limited Industrial (LI) but the underlying zoning comes from the East Valley Area Plan which is Special Development (SD). There is also SD zoning in the Development Code The table presented in Response to Comment 1-9 is from the EV Area Plan and what would supersede the Development Code. The IS/MND's conclusions are supported by substantial evidence and no additional analysis is required.

Response to Comment 1-13

[2] http://www.sbiaa.org/wp-content/uploads/2019/07/7_Appendix-F_Noise-Technical-Memo.pdf

[3] Redlands Municipal Airport Land Use Compatibility Plan, revised May 6, 2003.

The County respectfully disagrees with there being a requirement that a consistency review of land use plans, policies, or regulations such as the Countywide General Plan and Countywide Plan Policies to document that the project is consistent. The County had determined that the Project is consistent with those policies stated in the letter as well as all others noted throughout the IS.

Based on the description of the Proposed Project and the analyses provided in the IS and its supporting technical studies, no conflicts would occur because:

1. Policy LU-2.3 The Project has been located, scaled, buffered, and designed for compatibility with the surrounding natural environment and biodiversity. The project is in an area that has been transitioning from agricultural to industrial uses as provided for in the East Valley Area Plan.
2. Policy LU-2.6 Coordination with adjacent entities. The County has communicated with the City of Redlands to maximize land use compatibility, inform future planning and implementation, and realize mutually beneficial outcomes. The project is located within the City of Redlands sphere of influence; therefore, the project was screened for both level of service (LOS) analysis and vehicle miles traveled (VMT) analysis using the established criteria as specified in both County and City Guidelines.
3. Policy LU-4.5 The project has been determined to be consistent with and reinforce the physical and historical character of the unincorporated community in which it lies.
4. Goal TM-1 The project area is served by roads with capacity that is adequate for residents, businesses, tourists, and emergency services as documented in the Project's Transportation Study Screening Assessment.
5. Policy TM-1.1 Roadway level of service (LOS) will not be reduced by the Project. Roadways servicing the site will maintain a minimum of LOS D as required in the Valley Region.
6. Goal TM-3 The project is consistent with the County's goal to maintain a pattern of development and transportation system that minimizes vehicle miles traveled by being located near two major freeways and within an area with a local labor pool.
7. Policy TM-3.1 VMT Reduction. The project's employment demand is anticipated to come from the local labor pool as there would be no highly specialized positions for which available labor is minimal. Thus, the project is anticipated to minimize the need for new housing as well as commuting distances.
8. Goal NR-1 A Health Risk Assessment was prepared for the project and concluded that the health and wellness of residents in San Bernardino County would not be significantly impacted by the project.
9. Policy NR-1.7 The project would not preclude the County from meeting greenhouse gas reduction targets. Although not required for a CEQA projects with less than significant GHG emissions, the applicant has found ways to further reduce the Project's GHG impact with design features. All design features will be included as conditions of approval.
10. Policy NR-1.9 Final Design Plans will comply with the County Policy to use CALGreen Code to meet energy efficiency that improve environmental sustainability and reduce emissions.
11. Policy HZ-3.1 A Health Risk Assessment was prepared and documents cancer risks to the surrounding population would not exceed EPA thresholds.
12. Policy HZ-3.18 The project is not within or adjacent to an unincorporated environmental justice focus area as designated by San Bernardino County.

The County respectfully disagrees with there being a requirement that a consistency review of all goals and policies must be included in the CEQA document. The Project is consistent with those stated in the letter as well as others noted throughout the Initial Study. The IS/MND's conclusions are supported by substantial evidence and no additional analysis is required.

Response to Comment 1-14

Commenter believes that the IS must demonstrate consistency with SCAG's Connect SoCal 2020-2045 RTO.SCS. The County is not obligated to provide a consistency review with the SCAG plan.

As a metropolitan planning organization – the largest in the nation – SCAG is responsible for developing long-range transportation plans and a Sustainable Communities Strategy for a vast and varied region, which includes the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. The centerpiece of that planning work is Connect SoCal, our 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Connect SoCal is an important planning document for the region, allowing public agencies who implement transportation projects to do so in a coordinated manner, while qualifying for federal and state funding. SCAG is required by federal law to prepare and update a long-range regional transportation plan, keep up with Clean Air Act requirements, monitor system performance, and develop a sustainable communities strategy to achieve greenhouse gas reduction targets set by the California Air Resources Board (ARB). (*SoCal Connect a Plan Summary, Proposed Final, April 2020.*

The referenced document is simply a planning tool and is not a regulation and does not require that the County perform consistency reviews.

Response to Comment 1-15

Comment states that Population and Housing analysis within the Initial Study is inadequate because Project employment projections and impacts on population and housing is not analyzed prior to reaching the conclusion of less than significant. The comment further states that the labor force was described as the "region" and more specific data on employees should be provided to determine VMT impacts.

The current unemployment rate in the City of Redlands is 3.26% with 1,200 individuals being unemployed. Countywide there are 42,400 unemployed individuals[4]. The County believes that the Proposed Project's demand for short-term construction (18 months) employees can and would be filled by the local labor pool based on current data, and that no further analysis is required.

Response to Comment 1-16

Based on the available employees as presented above in Response to Comment 1-15, the ten office personnel are highly likely to come from the Redlands vicinity thereby reducing VMTs. No further analysis is required.

Response to Comment 1-17

This comment states that Population and Housing analysis within the Initial Study is inadequate because the use of local labor pool to fill employment positions is not supported. This comment does not seem to correspond with this project's evaluation as the cumulative projects proposed in the comment are located far from the proposed project. The comment further provides a SCAG calculation of projected employment being 179 employees. The number of employees stated in the Initial Study for the project is based on actual data from similar facilities operating throughout southern California. Note that the Project employment projections do not include truck drivers which may be accounted for in other jurisdictions (e.g. place of residence which may not be Redlands vicinity). The IS/MND's conclusions are supported by substantial evidence and no additional analysis is required.

Response to Comment 1-18

Commenter believes that the MND "has chosen to state if the existing onsite residence is vacant or occupied based on the threshold of significant at hand".

[4] State of California EDD, Monthly Labor Force Data November 2022 - Preliminary

At the time the Traffic Scoping Agreement was sent to the County Traffic Engineer for review and approval, the on-site residence was occupied and therefore a reduction of 9 daily trips was taken. The TIA screens out based on peak hour trips and adding one trip per hour does not raise it above the threshold. Additionally, the VMT analysis is based on the TAZ data, so a 9-trip reduction does not affect the analysis. Whether these trips were included in the total daily trips to be generated, the traffic study conclusions would remain the same. At the time the IS was being completed for circulation to the public, the residence was vacated. There was no inconsistency that would change the findings of the IS. The County disagrees that an EIR is required.

Response to Comment 1-19

Comment relates to hazardous conditions resulting from trucks entering/existing the site due to driveways widths and queuing distances. A truck turning template, prepared to meet County standards has been submitted as part of the Application package, and approved by DPW Traffic Division. The County standard of a 34' drive has been exceeded; the proposed driveway width on the west side of the project is 50'. Final Site will be subject to County review and approval prior to the issuance of grading permits. The County disagrees that an EIR is required for a Plan Check item.

Response to Comment 1-20

The commenter questions the enforceability of the mitigation provided to reduce VMT below County thresholds and states such unenforceability is in violation of CEQA. As stated on Pages 64 – 65 of the IS, The County TIS Guidelines identify specific Transportation Demand Management (TDM) measures applicable to the region that may be implemented to reduce VMT impacts. These measures were originally developed based on guidance from the California Air Pollution Control Officers Association (CAPCOA) Quantifying Greenhouse Gas Mitigation Measures (August 2010), which has been superseded by the CAPCOA Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities and Advancing Health and Equity Designed for Local Governments, Communities and Project Developers (December 2021) ["CAPCOA GHG Reduction Handbook"]. As noted in the County TIS Guidelines, the following choices are available to mitigate VMT impacts:

- Revisit project design features and or land use to reduce project trips or reduce trips length.
- Consider development in a more efficient area
- Look for other measures to reduce trip lengths or the number of trips generated through the use of transportation demand management (TDM) measures.

Based on review of transportation emissions reduction measures that are applicable at the project/site level and target employee commute VMT, Mitigation Measure TRANS-1 was recommended and approved by the County to reduce impacts to less than significant. Mitigation Measures are enforced by implementation of a Mitigation Monitoring and Reporting Program (MMRP).

Response to Comment 1-21

Commenter disagrees with the VMT methodology. The County concurs that the CalEEMod does estimate an annual VMT of 1,256,937. For a daily trip rate of 377 vehicles, this results in less than 10 miles per day per vehicle. Impacts are determined to be less than significant with mitigation. The IS/MND's conclusions are supported by substantial evidence and no additional analysis is required.

Response to Comment 1-22

Comment relates to the need to prepare an EIR to provide a cumulative impacts analysis. As stated on page 79 of the IS, although cumulative impacts are always possible, by incorporating all mitigation measures outlined herein, as part of approving the Proposed Project, would reduce the Project's contribution to any such cumulative impacts to levels that are not cumulatively considerable. Additionally, mitigation measures have been adopted by the County of San Bernardino for buildout of the Countywide

Plan, Therefore, with the incorporation of mitigation identified in this document, the Project would result in individually limited, but not cumulatively considerable, impacts and an EIR is not required.

Response to Comment 1-23

Conclusionary statement that GSEJA believes an EIR must be prepared and requests to be added to the public interest list for this project.

County has made the determination that the IS/MND's conclusions are supported by substantial evidence and an EIR is not required. GSEJA will be included on all future notices regarding the project.

RESPONSES TO COMMENT LETTER 1A
BLUM COLLINS & HO, LLP ATTACHMENT
PREPARED BY SWAPE
DATED DECEMBER 23, 2023
Almond Avenue Warehouse MND
(SCH# 2022120196)

Response to Comment 1A-1

Introductory comment stating that the Initial Study and Mitigated Negative Declaration (IS/MND) has been reviewed for the project located in the City of San Bernardino. This letter was submitted as an attachment to Letter 1 received from Blum Collins & Ho, LLP (see Response to Comment 1-5).

For clarification, the project is located in San Bernardino County

Response to Comment 1A-2

This comment states that soil sampling should be conducted as the site was used for agricultural purposes for more than 90 years and residual pesticides may remain causing potential hazards to construction workers and adjacent residents. Results should be disclosed in an EIR.

A soils investigation, including sampling has been complete and filed with the County and therefore no mitigation measure is required in the CEQA document. Hazard Management Consulting Inc., (HMC) conducted a Phase I ESA for the site in accordance with the ASTM E1527-13 guidelines for the property located at 77 & 27195 Almond Ave in Redlands, California. Based on the results of our assessment there were no RECs, CRECs or HRECs found to be present at the site. While not an REC per ASTM definition, there is moderate likelihood that ACMs are present in the building materials. Given the findings of this ESA, we recommend that an asbestos survey should be conducted at the Site prior to any demolition activities.

The County disagrees that an EIR is required.

Response to Comment 1A-3

Commenter suggests that additional output files associated with the 2022.1 version of CalEEMod be provided in the IS/MND so that the reader can review the model's input parameters. Alternatively, an older version of CalEEMod should be used.

All CalEEMod output files were provided as an attachment to the Initial Study. No outputs were omitted. With the most recent CalEEMod version available using an outdated version as suggested, would have been illogical. The County disagrees that an EIR is required.

Response to Comment 1A-4

Commenter suggests that the model includes the 208,000-SF warehouse as unrefrigerated warehouse space. However, this is potentially incorrect, as the IS/MND fails to identify the Project's future tenants or discuss if the proposed warehouse would include cold storage uses or not.

The proposed project was modeled as an unrefrigerated warehouse as this is what the applicant is proposing. If the end use were to propose cold storage as part of their operation model County may require a revision to an approved action application be filed potentially resulting in further environmental review.

Response to Comment 1A-5

Commenter suggests that the default changes to the short-term construction schedule "architectural coating-painting schedule" need justification. Justification was provided, based on the Applicant's anticipated construction schedule of a minimum of 6 weeks (30-days as disclosed in the Initial Study).

Therefore, if it takes longer to complete the task, short-term architectural coating emissions would be less, as the construction phase would be lengthened.

Response to Comment 1A-6

SWAPE indicates they ran CalEEMod 2022.1.1.2 and adjusted the architectural coating construction phase, resulting in higher VOC emissions output.

Please Refer to Response 1A-5.

CEQA Guidelines Section 15151. STANDARDS OF ADEQUACY OF AN EIR states that an EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes into account environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.

As the appropriate CEQA document, the IS/MND's conclusions are supported by substantial evidence and no additional analysis is required.

Response to Comment 1A-7

A Health Risk Assessment Analysis (HRA) dated October 5, 2022 was prepared for the Proposed Project by Ganddini Group Inc. The HRA was performed to address the possibility of cancer and non-cancer risk for nearby sensitive receptors from project-related diesel emissions (see pages 19 – 20 of Initial Study). According to the HRA, the highest cancer risk corresponds to Receptor 1, with a maximum risk of 0.151 in one million for infants (0-2 years). The maximum 3rd trimester (0.25-year) cancer risk is at Receptor 1; with a maximum cancer risk of 0.011 in a million. The highest child (2-16 years) cancer risk is at Receptor 1; with a maximum risk of 0.141 in one million and the highest adult (16-30 years) cancer risk is at Receptor 1; with a maximum risk of 0.014 in one million. Therefore, no children or infants are exposed to cancer risks in excess of the OEHHA threshold of 10 in one million. Also refer to Responses to Comments 1-6 and 1-7.

Much of the comment summarizes climate change research findings broadly and states climate changes is a catastrophic and pressing threat to California. This comment does not require a detailed response. The County disagrees that the Proposed Project would disproportionately contribute to and exacerbate health conditions of the residents of San Bernardino or any disadvantages communities. The IS/MND's conclusions are supported by substantial evidence and no additional analysis is required.

Response to Comment 1A-8

The Health Risk Assessment evaluated potential impacts to the nearest sensitive receptors to the project site as well as the Packinghouse Christian Academy. The sensitive receptors being the existing multi-family residential uses located adjacent to the south and approximately 865 feet to the northeast of the project site. A sports field behind the Packinghouse Christian Academy is located approximately 700 feet northwest of the project site; no children or infants were determined to be exposed to cancer risks associated with the Proposed Project in excess of the OEHHA threshold of 10 in one million. Also refer to Response to Comment 1A-7. The IS/MND's conclusions are supported by substantial evidence and no additional analysis is required.

Response to Comment 1A-9

Refer to Responses to Comments 1A-7 and 1A-8.

Response to Comment 1A-10

Refer to Responses to Comments 1A-3 through 1A-6.

Response to Comment 1A-11

Commenter suggests that several of the values inputted into the models are not consistent with information disclosed in the IS/MND.

The information in the IS/MND is consistent with the outputs from the CalEEMod 2022 model outputs which are consistent with the proposed project being reviewed – a 208,000 square-foot warehouse building generating approximately 377 total daily trips. The IS/MND's conclusions are supported by substantial evidence and no additional analysis is required.

Response to Comment 1-12

Commenter states that the SCAQMD threshold for Greenhouse Gas Emissions is outdated and inapplicable to the proposed project.

The IS/MND does not rely on the SCAQMD threshold but rather relies upon compliance with the County's climate action plan for reducing GHG emission to below a level of significance through 2020. Post-2020 and in accordance with judicial guidance on analyzing a project's compliance with SB 32 GHG reduction goals, the Final EIR uses a qualitative threshold based whether or not the project conflicts with those measures identified in the state's scoping plan for mitigating GHG impacts that are applicable locally and to these warehouse types of development. For time periods after the SB 32 GHG reduction target, the County finds it too speculative to analyze the significance of Project's GHG impacts.
Although not required for projects having less than significant GHG emissions, the applicant has found ways to further reduce the Project's GHG impact with design features. All design features will be included as Conditions of Approval.

Response to Comment 1A-13

Commenter states that the analysis failed to Identify a Potentially Significant GHG Impacts.

GHG emissions were modeled using CalEEMod 2022. Furthermore, project emissions were compared to San Bernadino County Greenhouse Gas Screening Thresholds. Project impacts were less than significant. As the appropriate CEQA document, the IS/MND's conclusions are supported by substantial evidence and no additional analysis is required.

Response to Comment 1A-14

This comment identifies mitigation measures the commenter considers applicable to the Project.

No new significant information or new significant impacts have been identified in the Responses to Comments that were not previously discussed in the IS/MND. Substantial evidence in the Initial Study supports the adoption of a MND. Although the IS/MND mentions Mitigation Measure GHG-1, upon further scrutiny, it has been realized that this is a typographical error; there is no mitigation necessary, as GHG emissions do not exceed thresholds outlined in the San Bernardino County Greenhouse Gas Reduction Plan (updated 2021), and therefore are less than significant. The County disagrees that any additional mitigation is required for less than significant impacts.

Response to Comment 1A-15

Commenter states, it is policy of the State that eligible renewable energy resources and zero-carbon resources supply 100% of retail sales of electricity to California end-use customers by December 31, 2045, we emphasize the applicability of incorporating solar power system into the Project design. Until the feasibility of incorporating on-site renewable energy production is considered, the Project should not be approved.

GHG emissions were modeled using CalEEMod 2022. Project Emissions were compared to San Bernadino County Greenhouse Gas Screening thresholds. Project impacts were less than significant. However,

compliance with the UBC would further reduce emissions thereby aid the States goal of zero-carbon emissions. Pursuant to the San Bernardino County Development Code section 85.06.040 *Findings Required,* all Conditional Use Permits (CUP) must be able to make the following finding:

(7). The design of the site has considered the potential for the use of solar energy systems and passive or natural heating and cooling opportunities.

Through the orientation and design of the building, the Project will be able to take advantage of passive solar heating capabilities when the time comes for the proponent to do so.

Response to Comment 1A-16

The County disagrees that any of the referenced analyses listed requires updating or additional mitigation measures as discussed in Responses to Comments 1-7, 1-8, and 1A-2 through 1A-15.

Response to Comment 1A-17

This comment states that commenter retains the right to revise or amend its report when additional information becomes available. Comment is noted and no further response is necessary.

Golden State Environmental Justice Alliance
Green Jobs & Clean Communities
P.O. Box 79222
Corona, CA 92877

February 7, 2023

Anthony De Luca
Senior Planner
County of San Bernardino
anthony.deluca@lus.sbcounty.gov

Re: Almond Avenue Warehouse MND Project, SCH Number 2022120196

Dear Mr. De Luca:

On behalf of the Golden State Environmental Justice Alliance ("GSEJA"), I am writing to you regarding the Almond Avenue Warehouse MND Project, SCH Number 2022120196 ("Project").

GSEJA is withdrawing its comment letter and opposition to the Project. The Project's developer has addressed GSEJA's concerns about environmental mitigation.

Sincerely,

Joe Bourgeois
Executive Director

EXHIBIT F

Findings

FINDINGS: Conditional Use Permit

The following are the required findings, per the San Bernardino County Development Code (Development Code) Section 85.06.040 and supporting facts for the Conditional Use Permit (PROJ-2022-00117) for the construction and operation of a 208,000-sf concrete tilt-up warehouse with 24 dock doors and including 6,000 sf of office area (Project) on approximately 9.55 acres on the south side of Almond Avenue in the East Valley Area Plan, unincorporated San Bernardino County.

1. **The site for the proposed use is adequate in terms of shape and size to accommodate the proposed use and all landscaping, open space, setbacks, walls and fences, yards, and other required features pertaining to the application.**

   The Project's site plan establishes that the Project complies with Development Code standards in terms of setbacks, parking, landscaping, walls, and fences. There is an existing 9' concrete screen wall on the west boundary and the residential adjacent portion of the south boundary. An 8' tubular steel fence is proposed on the remainder of the south boundary and the east boundary of the parcel. A landscaping plan will be provided and will be required to comply with the Landscaping Standards provided in the Development Code, Section 83.10.060, and Table 83-12 "Minimum Landscaped Area", which is 15% or 1,000 square feet whichever is larger. The applicant proposes to provide 10.8% landscaping by utilizing the provision in the East Valley Area Plan - Site Design and Guidelines section EV.0330(I)(5), which states "The landscaped area requirement may be reduced by a maximum of five (5) percentage points where public art is to be displayed in a setting which enhances pedestrian spaces and building architecture. Minimum cost of public art shall be one (1%) percent of the overall cost of the project as stated on the building permit." At the discretion of the Director, in lieu of a public art display, the developer may also make the 1% donation to an agreed upon party when it is not feasible or practical to display art for public view. The applicant has proposed a donation to the San Bernardino County Museum to satisfy this arrangement.

2. **The site for the proposed use has adequate legal and physical access, which means that the site design incorporates appropriate street and highway characteristics to serve the proposed use.**

   The site for the proposed use has two (2) points of vehicle access. A 50' wide full access gated driveway on Almond Avenue on the west side of the proposed warehouse which is where trucks would enter to access loading bays. One 30' full access driveway on the east side of the proposed warehouse to access the office areas of the building. The 30' driveway continues along the rear of the property to provide continuous access surrounding the proposed warehouse for purposes of fire access.

3. **The proposed use will not have a substantial adverse effect on abutting property or the allowed use of the abutting property, which means the use will not generate excessive noise, traffic, vibration, lighting, glare, or other disturbance.**

   The proposed use will not generate excessive noise, traffic, vibration, lighting, glare, or other disturbance. The Project is required to comply with all requirements of the Development Code with respect to noise, vibration, lighting, and glare. In addition, the use will not interfere with the present or future ability to use solar energy systems.

4. The proposed use and manner of development are consistent with the goals, maps, policies, and standards of the County General Plan and any applicable Community or Specific Plan.

The Project specifically implements the following goals and policies of the Policy Plan:

Goal LU-1: *Growth and development that builds thriving communities, contributes to our Complete County, and is fiscally sustainable.*

Policy LU-*1.1 Growth: We support growth and development that is fiscally sustainable for the County. We accommodate growth in the unincorporated county when it benefits existing communities, provides a regional housing option for rural lifestyles, or supports the regional economy.*

Policy LU-*1.2 Infill Development: We prefer new development to take place on existing vacant and underutilized lots where public services and infrastructure are available.*

- Goal/Policy Implementation: The proposed Project is located on two lots in a populated area developed with similar warehousing uses between Alabama Street and Nevada Street, south of San Bernardino Avenue and Lugonia Avenue approximately 0.37 miles north of Interstate 10, and 0.54 miles west of the Foothill Freeway (210). The Project is appropriately sited and compatible with the surrounding area.

Goal ED-1 Unincorporated Land and Facilities: *Increased business investment in land and facilities and job growth in key unincorporated areas.*

Policy ED-1.1 Marketing Focus: *In unincorporated areas, we actively market sites for business park and industrial development in employment focus areas, and we actively market sites for retail and commercial businesses in commercial focus areas.*

- Goal/Policy Implementation: The Project is located in an area surrounded by similar industrial uses as well as compatible commercial/retail uses located in the Redlands "Donut Hole", an area largely developed intentionally for such uses. Considering features of the site design, the arrangement of land uses within the vicinity, and data included in the supporting studies, the Project is appropriately sited and compatible with the surrounding area.

The review authority further find that the Project has been designed to ensure compliance with all applicable standards of the Airport Safety Overlay District 3 and will be developed in a manner that is consistent with the San Bernardino International Airport's Airport Comprehensive Land Use Plan.

5. There is supporting infrastructure, existing or available, consistent with the intensity of the development, to accommodate the proposed project without significantly lowering service levels.

There is supporting infrastructure including water and sewer service provided by the City of Redlands, evidenced by a will serve letter for such services dated July 6, 2022.

6. The lawful conditions stated in the approval are deemed reasonable and necessary to protect the overall public health, safety, and general welfare.

The conditions of approval include measures that require the developer to comply with countywide performance measures outlined in the Development Code.

7. **The design of the site has considered the potential for the use of solar energy systems and passive or natural heating and cooling opportunities.**

   Through the orientation and design of the buildings, the Project will be able to take advantage of passive solar heating capabilities.

ENVIRONMENTAL FINDINGS:

The environmental findings, in accordance with Section 85.03.040 of the San Bernardino County Development Code, are as follows:

Pursuant to provisions of the California Environmental Quality Act (CEQA) and the San Bernardino County Environmental Review guidelines, the above referenced Project has been determined to not have a significant adverse impact on the environment with the implementation of all the required mitigation measures which have been incorporated into the Project's conditions of approval. A Mitigated Negative Declaration (MND) and Mitigation Monitoring and Reporting program (MMRP) has been adopted, and a Notice of Determination (NOD) will be filed with the San Bernardino County Clerk of the Board of Supervisors office. The MND represents the independent judgment and analysis of the County acting as lead agency for the Project.

EXHIBIT G

Notice of Determination

Notice of Determination

To:

☐ Office of Planning and Research

U.S. Mail: P.O. Box 3044, Sacramento, CA 95812-3044

Street Address: 1400 Tenth St., Rm 113, Sacramento, CA 95814

☒ Clerk of the Board
County of: San Bernardino
Address: 385 North Arrowhead Avenue, Second Floor
San Bernardino, CA 92415-0130

From:
Public Agency: San Bernardino County, LUSD
Address: 385 North Arrowhead Ave, First Floor San Bernardino, CA 92415-0187
Contact: Anthony DeLuca
Phone: 909-387-4738

Lead Agency (if different from above):

Address:

Contact:
Phone:

SUBJECT: Filing of Notice of Determination in compliance with Section 21108 or 21152 of the Public Resources Code.

State Clearinghouse Number (if submitted to State Clearinghouse): SCH 2022120196

Project Title: Almond Avenue Warehouse Facility

Project Applicant: Xebec Realty Partners

Project Location (include county): 77 Almond Ave Redlands, CA, San Bernardino County

Project Description: A Conditional Use Permit for the construction and operation of a 208,000-sf concrete tilt-up warehouse with 24 dock doors and including 6,000 sq. ft. of office area on approximately 9.55 acres on the south side of Almond Avenue in the Community of Redlands in unincorporated San Bernardino County.

This is to advise that the San Bernardino County Planning Commission has approved the
(☒ Lead Agency or ☐ Responsible Agency)

above-described project on March 23, 2023 and has made the following determinations.

1. The project [☐ will ☒ will not] have a significant effect on the environment.
2. ☐ An Environmental Impact Report was prepared for this project pursuant to the provisions of CEQA.
   ☒ A Mitigated Negative Declaration was prepared for this project pursuant to the provisions of CEQA.
3. Mitigation measures [☒ were ☐ were not] made a condition of the approval of the project.
4. A mitigation reporting or monitoring plan [☒ was ☐ was not] adopted for this project.
5. A statement of Overriding Considerations [☐ was ☒ was not] adopted for this project.
6. Findings [☒ were ☐ were not] made pursuant to the provisions of CEQA.

This is to certify that the final record of project approval and the Mitigated Negative Declaration are available to the General Public at:

385 N. Arrowhead Ave., San Bernardino, CA 92415

Signature (Public Agency): ADeLucaJr Title: Senior Planner
Anthony DeLuca

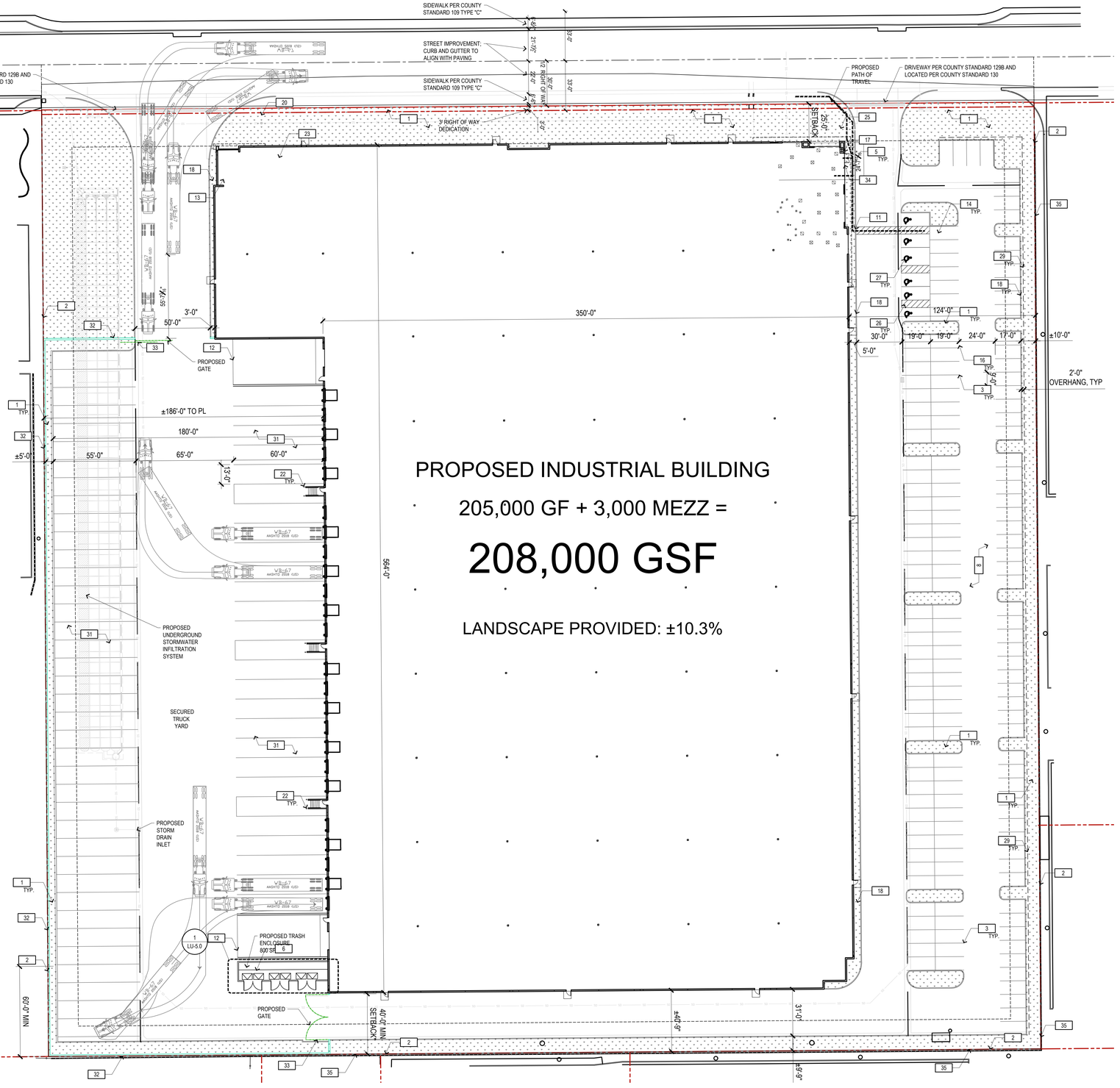
Date: 3/23/2023 Date Received for filing at OPR:

Authority cited: Sections 21083, Public Resources Code.
Reference Section 21000-21174, Public Resources Code. Revised 2011

EXHIBIT H

Site Plan

ALMOND AVENUE
(66' WIDE, PUBLIC RIGHT-OF-WAY)



PROPOSED INDUSTRIAL BUILDING

205,000 GF + 3,000 MEZZ =

208,000 GSF

LANDSCAPE PROVIDED: ±10.3%

PROJECT DATA:

APN #: 0292-055-03-0-000; 0292-055-04-0-000

SITE ADDRESS: 77 & 27195 ALMOND AVE REDLANDS, CA 92374

SITE AREA (NET): ± 415,700 SF 9.54 ACRES

JURISDICTION: SAN BERNARDINO COUNTY

OWNER/DEVELOPER:
ALMOND XC, LLC
ATTENTION DANNY RICKS
3020 OLD RANCH PARKWAY SUITE 200
SEAL BEACH, CA 90740
PHONE: 714-650-7111

UTILITIES:
WATER: CITY OF REDLANDS
SEWER: CITY OF REDLANDS
STORM DRAINAGE: COUNTY OF SAN BERNARDINO
GAS: SO CAL GAS
ELECTRIC: SCE

LEGAL DESCRIPTION:

PARCEL 1:

THE WEST HALF OF LOT 2 IN BLOCK 5 AS SHOWN BY THE MAP OF HENRY L. WILLIAMS TRACT, IN THE COUNTY OF SAN BERNARDINO, STATE OF CALIFORNIA, ON FILE IN BOOK 11, PAGE 17 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

PARCEL 2:

THE EAST HALF OF LOT 2 IN BLOCK 5 AS SHOWN BY THE MAP OF HENRY L. WILLIAMS TRACT, IN THE COUNTY OF SAN BERNARDINO, STATE OF CALIFORNIA, ON FILE IN BOOK 11, PAGE 17 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 0292-055-04-0-000, 0292-055-03-0-000

Proposed Building Floor Area: **208,000 sf**

Warehouse Area: 202,000 sf
Office Core Area: 3,000 sf
Mezzanine Area: 3,000 sf

Parking Data
Automobile parking sizes 9'-0" x 19' U.N.O.
Compact parking sizes 9'-0" x 17' (7'-6" x 15' minimum, 25% total maximum)

Tenant Parking 1 per 1000 first 40,000 GSF +
Industrial use parking required: 105 Automobiles 1 per 4000 GSF up to 100,000GSF
Total provided parking: 161 Automobiles
Compact parking provided: 62 Automobiles 143 x .25 = 35 allowed
Accessible parking required: 6 (101 to 150 stalls provided)
Accessible parking provided: 6 Includes 1 ADA van stalls provided

Bicycle & Clean Air Parking Data

Short term bike parking required: 0 No visitor traffic
Short term bike parking provided: 0

Long term bike parking required: 7 5% of 143 Employee parking spaces
Long term bike parking provided: 7 Located within the secured warehouse

Clean Air/Carpool parking required: 11 (101 to 150 auto stalls provided)
Clean Air/Carpool parking provided: 11

EV Ready parking required: 7 (101 to 150 auto stalls provided)
EV Ready parking provided: 7 Part of clean air parking, conduit stub only
ADA EV Ready Parking provided: 2 Includes 1 van accessible space

LANDSCAPE COVERAGE

LAND AREA AC: 9.54 AC
LAND AREA SF: ±415,700 SF
FAR: 50%
COVERAGE: 59.3%
LANDSCAPE AREA SF: 42,763 SF
LANDSCAPE AREA %: 10.3%

KEYNOTES

1 LANDSCAPE AREA - REFER TO LANDSCAPE AND IRRIGATION PLANS
2 PROPERTY LINE OR PARCEL LINE - SEE CIVIL DRAWINGS
3 PARKING STALL STRIPING - SEE DETAIL 8/A1.2
4 LOADING ZONE PER CITY OF STANDARDS.
5 ACCESSIBLE PATH OF TRAVEL - NOT TO EXCEED 5% SLOPE IN DIRECTION OF TRAVEL AND 2% CROSS SLOPE
6 ACCESSIBLE TRASH ENCLOSURE WITH CONCRETE APRON. SEE DET 3/A1.3
7 FIRE HYDRANT - SEE CIVIL AND FIRE PROTECTION DWGS.
8 24'-0" WIDE FIRE LANE. UNOBSTRUCTED AND CLEAR TO SKY PER FIRE DEPARTMENT STANDARDS. SEE DETAIL 23/A1.2 FOR CURB PAINTING.
9 FIRE DEPARTMENT CONNECTION AND/OR BACKFLOW PREVENTER CHECK ASSEMBLY SEE FIRE PROTECTION DRAWINGS.
10 4" THICK MIN. CONCRETE WALKWAY WITH MEDIUM BROOM FINISH - SEE LANDSCAPE DRAWINGS.
11 ACCESSIBLE CURB RAMP WITH 3' WIDE (MIN.) TRUNCATED DOMES SEE DET. 6 & 7/A1.2
12 COMPLIANT RAMP SLOPE NOT TO EXCEED 1:12 - SEE CIVIL DWGS.
13 FIRE SPRINKLER RISER - EXTEND TEST/DRAIN LINE TO CURB FACE
14 FUTURE ELECTRIC VEHICLE CHARGING STATION STALL. TYP. OF 7
15 INSTALL CONCRETE PAVING - SEE CIVIL, SOILS AND LANDSCAPE DWGS.
16 DESIGNATED PARKING FOR CLEAN AIR VEHICLES SEE 30/A1.2 FOR PAVEMENT MARKING, TYP. OF STALLS
17 RECESSED KNOX BOX FOR FIRE DEPARTMENT ACCESS
18 CONCRETE CURB 6" HIGH - SEE CIVIL DRAWINGS AND DETAIL 13/A1.2
19 ZERO CURB FACE, 0" HIGH - SEE CIVIL DRAWINGS
20 ELECTRICAL TRANSFORMER & PAD LOCATION - SEE ELECTRICAL DRAWINGS.
21 ENHANCED WALKWAY PAVING - SEE LANDSCAPE DRAWINGS
22 CONCRETE FILLED 6" DIA. STEEL PIPE BOLLARD - SEE 12/A1.2
23 ELECTRICAL SWITCHGEAR ROOM - SEE ELECTRICAL DWGS.
24 NO PARKING FIRE LANE SIGNS, PER FIRE DEPARTMENT STANDARDS - SEE DETAIL 4/A1.2
25 ACCESSIBLE PARKING ENTRY SIGN - SEE DETAIL 3/A1.2
26 ACCESSIBLE PARKING STRIPING PER ADA STANDARDS - SEE DETAIL 2/A1.2
27 ACCESSIBLE PARKING SYMBOL - SEE DETAIL 5/A1.2
28 BICYCLE RACKS - SEE CAL GREEN CODE NOTES FOR NUMBER NEEDED & DETAIL 11/A1.2
29 VEHICLE OVERHANG
30 LIGHT POLE-SEE ELEVATION DRAWINGS
31 CONCRETE TRUCK APRON IN TRUCK YARD. SEE STRUCTURAL AND SOILS DWGS.
32 NEW 6' HIGH CMU SCREEN WALL TO MATCH EXISTING CMU WALL
33 NEW 6' HIGH SWING GATE
34 NEW 6' HIGH SLIDING GATE
35 EXISTING 6' HIGH CMU WALL TO REMAIN

SITE LEGEND

PROPERTY LINE
PARKING LOT LIGHT - STANDARD
FIRE HYDRANT
KEYED NOTE
CENTER SIGNAGE
BIKE RACK
TRASH ENCLOSURE
TRANS. FORMER
CAV CLEAN AIR VEHICLE
EV FUTURE ELECT. VEHICLE CHARGING STATION
000 PARKING COUNT
REDWOOD HEADER
RETAINING WALL
DEDICATION (NEW PROPERTY LINE)
PARCEL LINE
MONUMENT SIGN
ACCESSIBLE ROUTE 5% MAX. SLOPE & 2% MIN. CROSS SLOPE
IRON FENCE
PROPERTY LINE

GENERAL NOTES

1. ALL PROPERTY LINES, EASEMENTS AND BUILDINGS, BOTH EXISTING AND PROPOSED, ARE SHOWN ON THIS SITE PLAN.
2. FRONTAGE USED FOR ALLOWABLE AREA INCREASES PER CBC SECTION 506.2 SHALL BE PERMANENTLY MAINTAINED.
3. SCREEN ALL TRANSFORMERS WITH LANDSCAPE MATERIAL AND OR WALLS IF APPROPRIATE.
4. COMMERCIAL AND INDUSTRIAL STREET ADDRESSES SHALL BE POSTED WITH A MINIMUM EIGHT INCH (8") NUMBERS VISIBLE FROM THE STREET. DURING THE HOURS OF DARKNESS THEY SHALL BE INTERNALLY OR EXTERNALLY, ELECTRICALLY ILLUMINATED. POSTED NUMBERS SHALL CONTRAST WITH THE BACKGROUND USED AND BE LEGIBLE FROM THE STREET. WHERE BUILDING SETBACKS EXCEED ONE HUNDRED FEET (100') FROM THE ROADWAY, ADDITIONAL NON-ILLUMINATED SIX INCH (6") NUMBERS SHALL BE DISPLAYED AT THE PROPERTY ACCESS ENTRANCE. THESE NUMBERS SHALL ALSO CONTRAST WITH THE BACKGROUND USED.

APPROVAL STAMP

30' 0 5' 10' 20' 30' 45' 60'

N

SITE DATA TABLE

LAND AREA AC	LAND AREA SF	FAR	COVERAGE %	LANDSCAPE AREA SF	LANDSCAPE AREA %	BLDG FOOT PRINT	BLDG MEZZ.	TOTAL BLDG SF	OFFICE SF	WAREHOUSE SF	OFFICE PRKG.	WHSE PRKG. 0-40K	WHSE PRKG. 40K+	PRKG REQ.	PRKG PROV.
9.54 AC	±415,700	50.0 %	59.3 %	425,120	10.8%	205,000	3,000	208,000	6,000	202,000	24	40	41	105	160
											(1/250)	(1/1000)	(1/4000)		(.8/1000)

Architecture. Design. Relationships.

SEAL

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SITE PLAN

Project Number: 2022-022
Plan Check Number:

2022-07-07 1st COUNTY LAND USE SUBMITTAL

SHEET
LU-1.0