



# LAND USE SERVICES DEPARTMENT PLANNING COMMISSION STAFF REPORT

**HEARING DATE:** August 9, 2018

**AGENDA ITEM 2**

## Project Description

**Vicinity Map -**



**APN:** 0292-051-21

**Applicant:** Jackson Smith / Newcastle Partners  
**Community:** Redlands/3rd Supervisorial District

**Location:** North side of San Bernardino Avenue,  
590 feet west of Alabama Street

**Project No:** P201700142/CUP

**Staff:** Aron Liang

**Rep:** Karina Fidler

**Proposal:** Conditional Use Permit to construct a  
190,086-square foot industrial  
warehouse building with 10,000 square  
feet of office space for a warehouse  
distribution center, on 8.5 acres.



**8 Hearing Notices Sent on : July 27, 2018**

Report Prepared By: Aron Liang, Senior Planner

## **SITE INFORMATION:**

Parcel Size: 8.5 acres

Terrain: Relatively flat vacant site

Vegetation: Former citrus grove and non-native grasses

## **TABLE 1 – SITE AND SURROUNDING LAND USES AND ZONING:**

AREA	EXISTING LAND USE	LAND USE ZONING DISTRICT
SITE	Vacant Land/Former Citrus Grove	East Valley/Special Development (EV/SD)
North	1.2 Million sq. ft. Warehouse Facility	East Valley/Special Development (EV/SD)
South	Church and Private School	East Valley/Special Development (EV/SD)
East	157,000 sq. ft. Warehouse Facility	East Valley/Special Development (EV/SD)
West	160,000 sq. ft. Warehouse Facility	East Valley/Special Development (EV/SD)

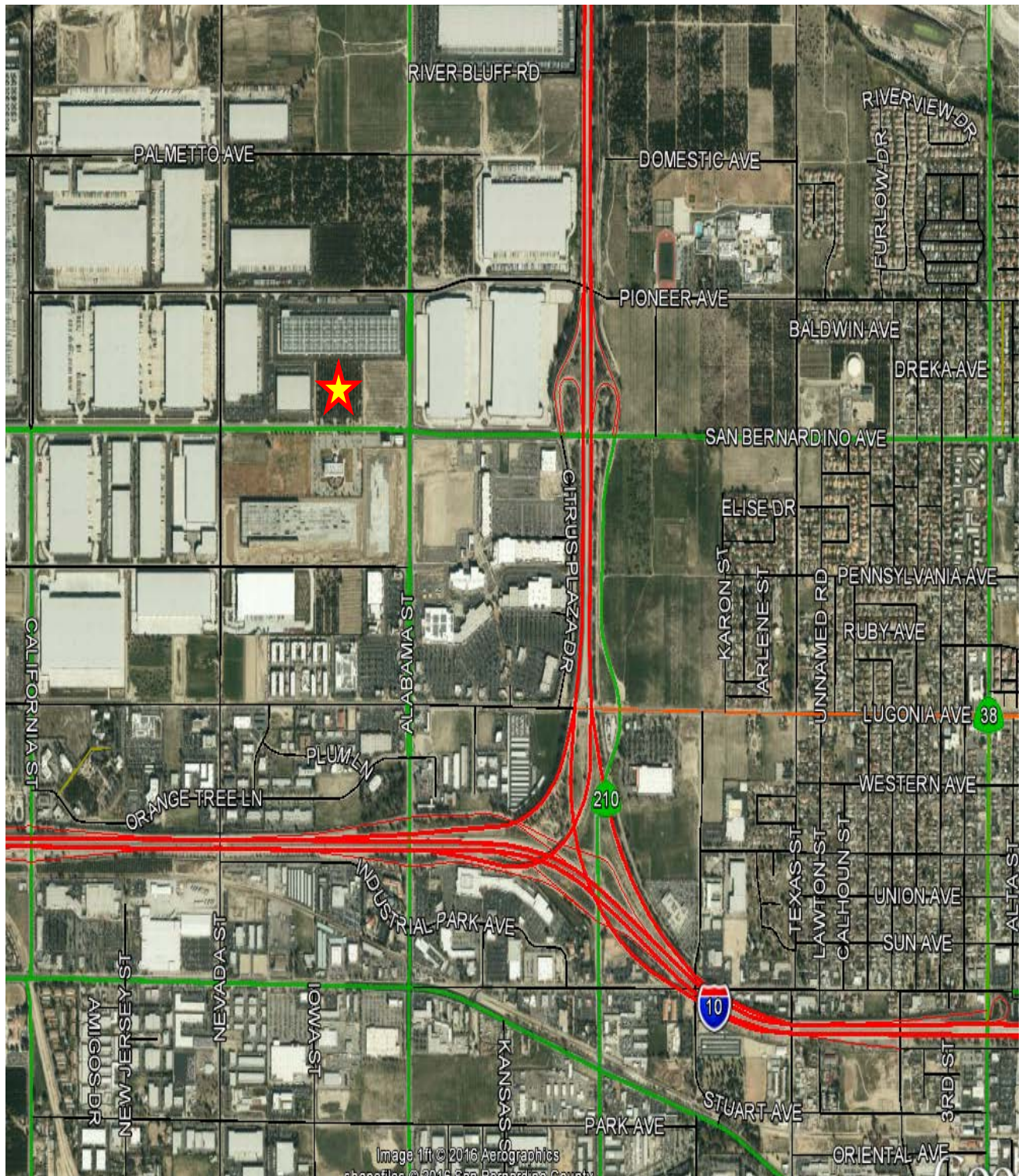
	<u>Agency</u>	<u>Comment</u>
City Sphere of Influence:	N/A	East Valley Area Plan
Water Service:	City of Redlands	Per Service Agreement Resolution
Sewer Service:	City of Redlands	Per Service Agreement Resolution

**STAFF RECOMMENDATION:** That the Planning Commission **ADOPT** the proposed Mitigated Negative Declaration, **ADOPT** the recommended Findings, **APPROVE** the Conditional Use Permit based on the recommended Findings and subject to the Conditions of Approval, and **FILE** a Notice of Determination.<sup>1</sup>

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

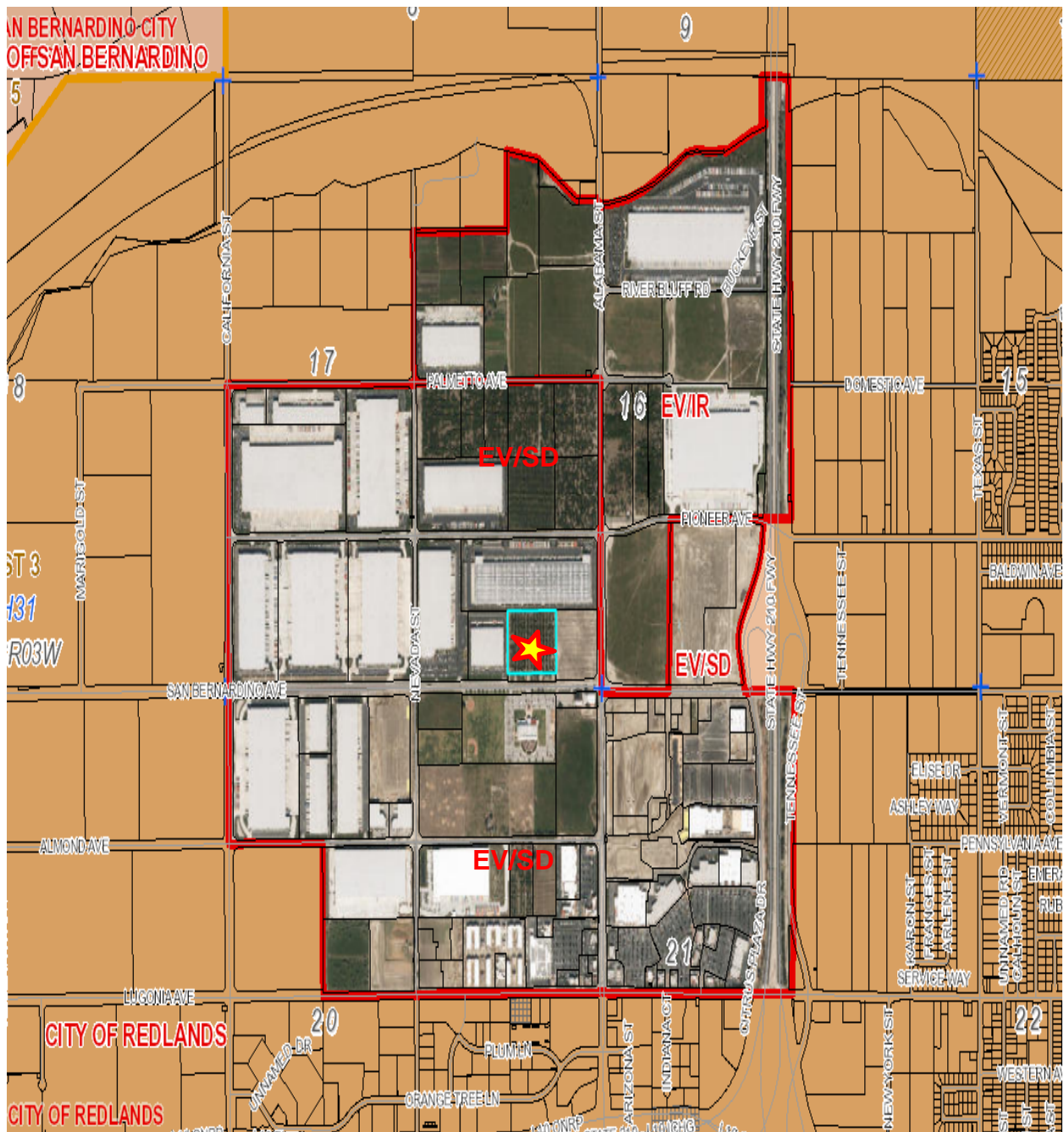


**VICINITY MAP:**  
Aerial view of the Project Site





LAND USE DISTRICT MAP:

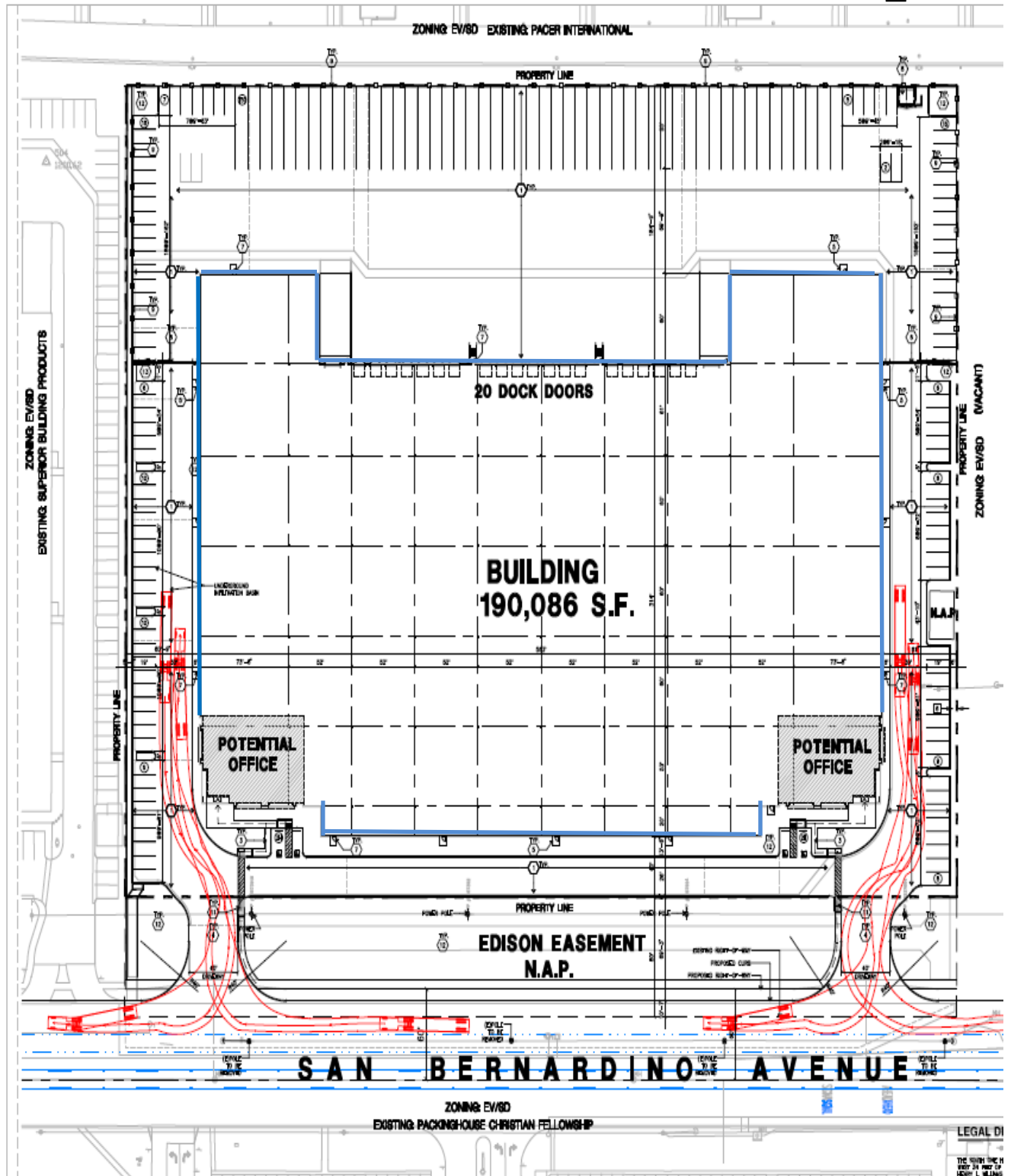


AERIAL MAP:





**SITE PLAN:**



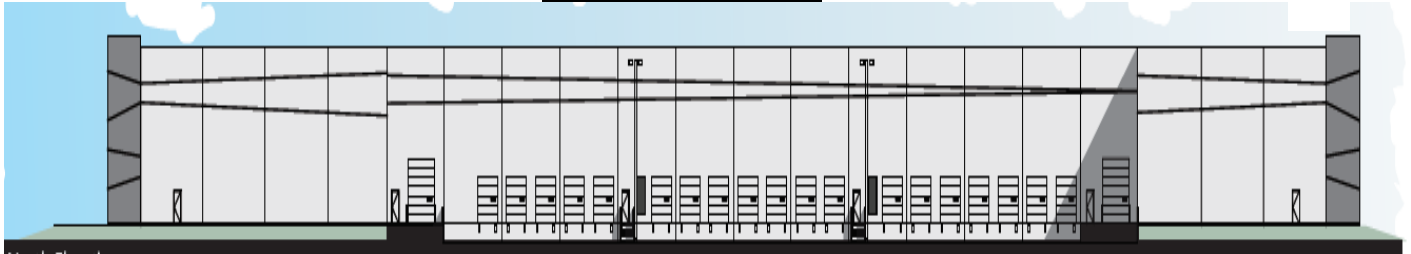
CONCEPTUAL LANDSCAPE PLAN:



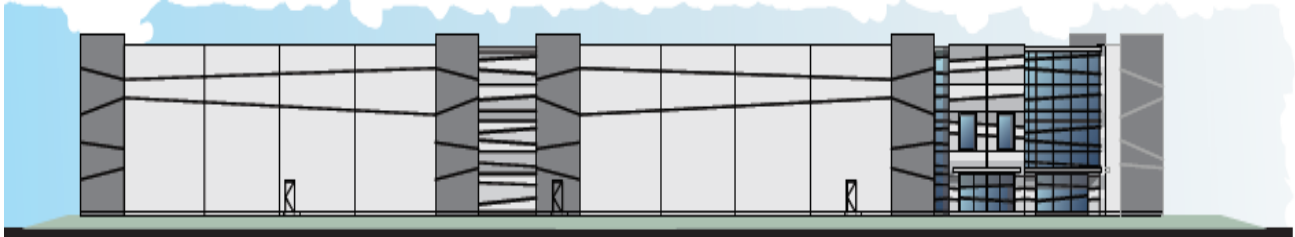


**BUILDING ELEVATIONS:**

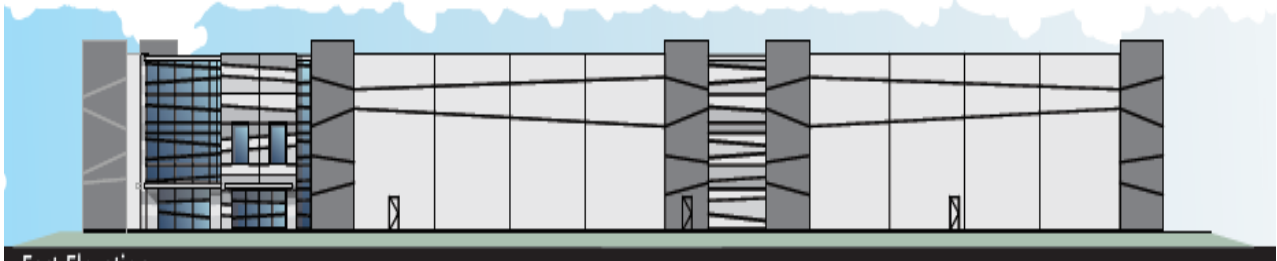
**NORTH ELEVATION**



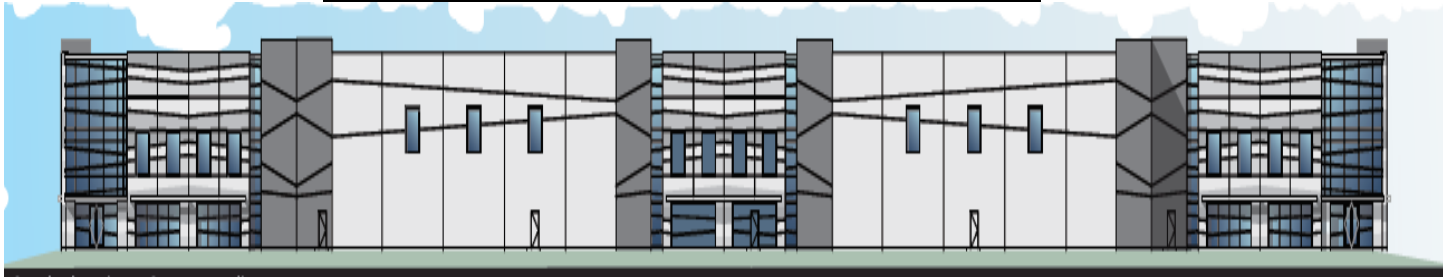
**WEST ELEVATION**



**EAST ELEVATION**



**SOUTH ELEVATION – SAN BERNARDINO AVENUE**



## SITE PHOTOS

East view from San Bernardino Avenue



North view from San Bernardino Avenue





## SITE PHOTOS

West view from San Bernardino Avenue



North view from San Bernardino Avenue



## PROJECT DESCRIPTION:

The applicant requests approval of a Conditional Use Permit (CUP) to construct a 190,086-square foot industrial building with 10,000 square feet of office space for a warehouse distribution center (Project). The Project site is approximately 8.5 acres, located on the north side of San Bernardino Avenue, approximately 590 feet west of Alabama Street, in the East Valley/Special Development (EV/SD) zoning district. The applicant, Newcastle Partners has presented a detailed project description in a letter of intent (Exhibit D).

The Project site was previously used as a citrus grove and is relatively flat, with slopes of less than two percent. The surrounding area is urbanized; developed with industrial uses to the north, east, west, and institutional uses to the south, within the EV/SD zoning district. The scope of the proposed development will consist of site clearing, site preparation, appurtenant improvements, and construction of the proposed warehouse building, with on-site parking and loading areas, circulation, landscaping and water quality management improvements. Off-site street and drainage improvements will also be constructed. The warehouse building will have loading docks on the north side of the building and the truck yard will be surrounded by the warehouse building and block walls for screening and noise attenuation. The Project perimeter will be landscaped. Access to the site for passenger cars, trucks, and other vehicles will be provided by two commercial driveways on San Bernardino Avenue.

## PROJECT ANALYSIS:

Site Planning: The Project is proposed on a speculative basis, with no tenant(s) pre-identified. The building is designed as a concrete tilt-up cross-dock facility with vertical lift dock-high roll up doors. There would be a total of 20 dock doors on the north side. The truck loading and staging areas on the north side of the warehouse would be screened from public view from San Bernardino Avenue with the combination of the warehouse building and 6-foot block walls along the north, west, and east property boundaries. The Project site plan provides adequate area to accommodate all parking, loading areas, access and circulation requirements needed to comply with County requirements (See Table 2 below).

Code Compliance Summary: As noted above, the Project satisfies all applicable standards of the Development Code for development in the EV/SD Land Use District, as illustrated in Table 2:

**Table 2: PROJECT CODE COMPLIANCE**

Project Component	Development Code Standard/East Valley Area Plan		Project Plans
Warehouse Distribution Facility	CUP		CUP
Parking	116		120
Landscaping	Trees Minimum Landscaping	12 in parking lot 15%	71 15% (55,243 sq. ft.)
Building Setbacks	Front Street Side Rear	25' 25' 20'	26' N/A 69'
Building Height	50 feet maximum		40 feet
Floor Area Ratio	.8:1		.51:1
Drive Aisles	26'		30'



**Landscaping:** The conceptual landscape plan provides 15% site coverage in drought-tolerant landscaping, with a variety of trees, groundcover and shrubs, in compliance with Development Code Section 83.10.060, Landscape Area Requirements. The Development Code only specifies a minimum number of trees in the parking area (one tree per 10 spaces). The Project exceeds that requirement and has ample tree planting in the perimeter landscaping, with a total of 120 trees. Additionally, 29 tall Mexican palm trees front the entire Project parcel, along San Bernardino Avenue, within the easement right-of-way. Fifteen of them will be salvaged and relocated as part of on-site landscaping.

**Hours of Operation:** The operator(s)/tenant(s) of the Project have not been pre-identified, so the precise nature of the facility operation cannot be specified at this time. Technical studies performed for the environmental analysis assume a relatively intensive operation of seven days per week in two eight-hour shifts, with an estimate of 50 to 75 employees.

### **California Environmental Quality Act (CEQA) Compliance**

An Initial Study (IS) has been completed in compliance with the California Environmental Quality Act (CEQA) (Exhibit E). The IS concludes that the Project will not have a significant adverse impact on the environment with the implementation of recommended Conditions of Approval and mitigation measures contained in the IS, which have been incorporated in the Conditions of Approval (Exhibit C). A Notice of Availability/Notice of Intent (NOA/NOI) to adopt a Mitigated Negative Declaration (MND) was advertised and distributed to initiate a 20-day public comment period, which concluded on April 19, 2018. Four comment letters to the NOA/NOI (Exhibit F) were received from: (1) the South Coast Air Quality Management District (SCAQMD), (2) the California Department of Transportation (Caltrans), (3) San Bernardino County Department of Public Works, and (4) the Packinghouse Christian Fellowship. Responses and updates were provided (Exhibit G).

Following are summaries of topics addressed in the IS/MND:

**Aesthetics:** The proposed Project will include a concrete, tilt-up structure, painted in shades of white and gray, with blue glazing on the windows facing San Bernardino Avenue, all of which are complementary to the existing warehouse facilities in the vicinity. The single-story building will be 40 feet tall, with two office tower design features at the corners of the building to provide vertical articulation. The Project design includes a landscape buffer and building features that will hide truck staging and loading activities and dock doors.

**Air Quality:** The Project air quality analysis shows that the Project will not violate any air quality standard or contribute substantially to an existing or projected air quality violation, because the proposed use would not exceed thresholds of concern as established by the SCAQMD. A dust control plan will be required as a standard condition to regulate short-term construction activities that could create windblown dust. Painting activities will be restricted as needed to comply with SCAQMD standards.

**Water Quality:** A Preliminary Water Quality Management Plan (WQMP) has been approved by the Land Development Division of Land Use Services to comply with the requirements of the San Bernardino County National Pollutant Discharge Elimination System (NPDES) Area-wide Stormwater Program. The Project drainage system will collect storm water runoff in two on-site underground corrugated metal pipe infiltration system designed and sized to accept storm water flows for on-site percolation within the prescribed period of time to avoid the nuisance of standing water. Requirements for approval of the final WQMP have been incorporated in the conditions of approval.

**Traffic:** A Traffic Impact Study has been prepared to evaluate potential Project-related traffic impacts. The Project is estimated to generate 891 Passenger Car Equivalent (PCE) trips on a daily basis, with 75 PCE trips (60 inbound and 15 outbound) in the AM peak hour and 80 PCE trips (20 inbound and 60 outbound) in the PM peak hour. The effect of these trips on the surrounding roadway network was

analyzed for both near-term Opening Year 2018 conditions, and long-term Horizon Year 2040 conditions. The forecast year 2018 and forecast year 2040 analysis included traffic associated with ambient growth and traffic generated by the proposed Project, in addition to a range of cumulative projects anticipated in the study area. A fee program is in place to fund improvements to the regional transportation system. The Project's obligation under this fee program, based on floor area, is estimated to be \$458,107.26.

**Public Comments:**

Project notices were sent to surrounding property owners within 300 feet of the Project site, as required by Development Code Section 85.03.080. A notice of availability of the Draft IS/MND was sent to surrounding property owners and responsible agencies, as part of the CEQA process. As noted, in response to the Project notices, four comment letters (Exhibit F) were received from the SCAQMD, Caltrans, San Bernardino County Department of Public Works, and Packinghouse Christian Fellowship. Responses provided are attached as Exhibit G.

**RECOMMENDATION:**

That the Planning Commission:

1. **ADOPT** the Mitigated Negative Declaration;
2. **ADOPT** the recommended Findings for approval of the Project,
3. **APPROVE** the Conditional Use Permit for the construction of a 190,086 sq. ft. warehouse building with 10,000 square feet of office space, subject to the recommended Conditions of Approval; and
4. **FILE** the Notice of Determination.

**ATTACHMENTS:**

EXHIBIT A: Site Plan  
EXHIBIT B: Findings  
EXHIBIT C: Conditions of Approval  
EXHIBIT D: Letter of Intent  
EXHIBIT E: Initial Study/Mitigated Negative Declaration  
EXHIBIT F: Comment Letters from SCAQMD, San Bernardino County Public Works, Caltrans, and Packinghouse Christian Fellowship  
EXHIBIT G: Responses to Comments

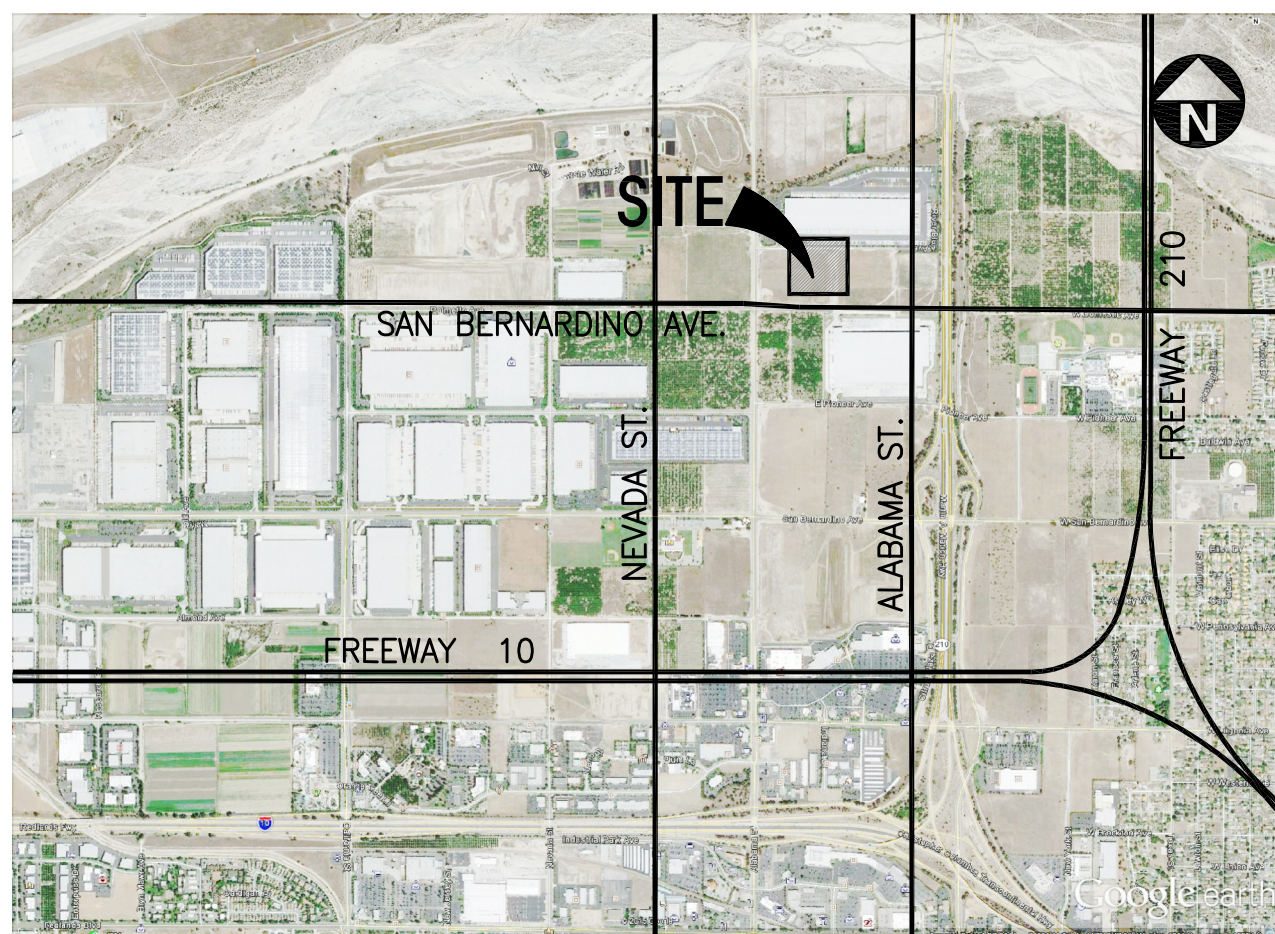


## EXHIBIT A

### Site Plan



## AERIAL MAP



hpa, inc.  
18831 bardeen avenue - ste. #100  
irvine, ca  
92612  
tel: 949-863-1770  
fax: 949-863-0851  
email: hpa@hparchs.com

Owner:



4740 GREEN RIVER ROAD STE. 118  
CORONA, CA 92880

tel: (951) 582-9800  
fax: (951) 278-4740

Project:

REDLANDS COMMERCE  
CENTER

County of San Bernardino  
CA

Consultants:

CIVIL SB&O INC.  
STRUCTURAL  
MECHANICAL  
PLUMBING  
ELECTRICAL HUNTER LANDSCAPE  
LANDSCAPE  
FIRE PROTECTION  
SOILS ENGINEER

Title: OVERALL SITE PLAN

Project Number: 15486

Drawn by: JW

Date: 3/3/2017

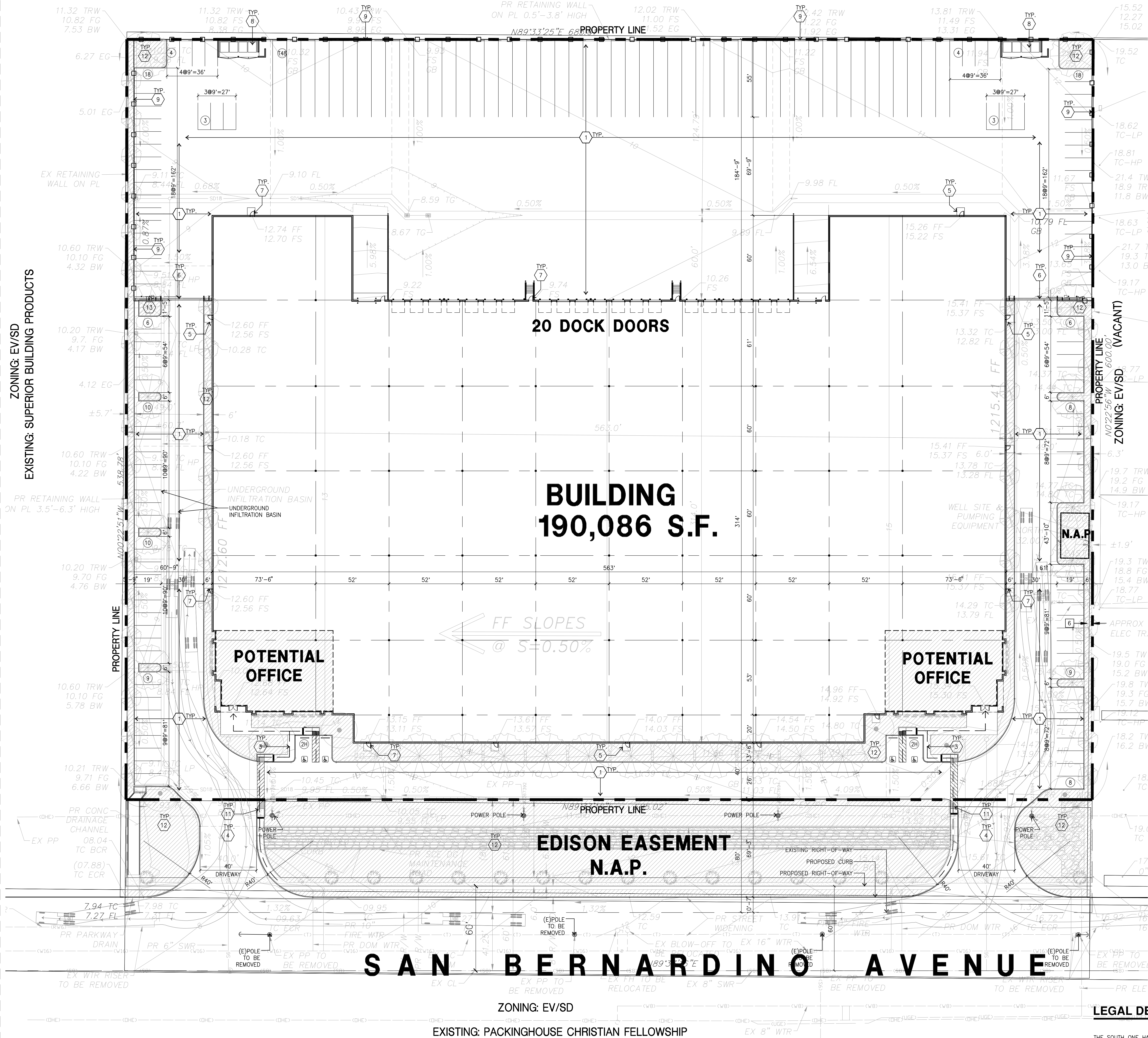
Revision: 5/1/2017

Revision 3/2/2018

Sheet:

A1.1

ZONING: EV/SD EXISTING: PACER INTERNATIONAL



## SITE PLAN GENERAL NOTES

1. THE SOILS REPORT PREPARED BY XXXX
2. IF SOILS ARE EXPANSIVE IN NATURE, USE STEEL REINFORCING FOR ALL SITE CONCRETE.
3. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE WALL, FACE OF CONCRETE CURB OR GRID LINE U.N.O.
4. SEE "C" PLANS FOR ALL CONCRETE CURBS, GUTTERS AND SWALES. DETAILS ON SHEET AD.1 ARE MINIMUM STANDARDS.
5. THE ENTIRE PROJECT SHALL BE PERMANENTLY MAINTAINED WITH AN AUTOMATIC IRRIGATION SYSTEM, PRIOR TO INSTALLATION & AT LEAST 60 DAYS BEFORE BLDG. COMPLETION.
6. SEE "C" DRAWINGS FOR POINT OF CONNECTIONS TO OFF-SITE UTILITIES. CONTRACTOR SHALL VERIFY ACTUAL UTILITY CONTRACTOR SHALL VERIFY ACTUAL UTILITY LOCATIONS.
7. PROVIDE POSITIVE DRAINAGE AWAY FROM BLDG. SEE "C" DRAWINGS
8. CONTRACTOR TO REFER TO "C" DRAWINGS FOR ALL HORIZONTAL CONTROL DIMENSIONS. SITE PLANS ARE FOR GUIDANCE AND STARTING LAYOUT POINTS.
9. SEE "C" DRAWINGS FOR FINISH GRADE ELEVATIONS.
10. CONCRETE SIDEWALKS TO BE A MINIMUM OF 4" THICK W/ TOOLED JOINTS AT 8' O.C. EXPANSION/CONSTRUCTION JOINTS SHALL BE A MAXIMUM 12" EA. WAY W/ 1/20 MAX. SLOPE. EXPANSION JOINTS TO HAVE COMPRESSIVE EXPANSION FILLER MATERIAL OF 1/4". SEE "L" DRAWINGS FOR FINISH.
11. PAINT CURBS AND PROVIDE SIGNS TO INFORM OF FIRE LANES AS REQUIRED BY FIRE DEPARTMENT.
12. CONSTRUCTION DOCUMENTS PERTAINING TO THE LANDSCAPE AND IRRIGATION OF THE ENTIRE PROJECT SITE SHALL BE SUBMITTED TO THE BUILDING DEPARTMENT AND APPROVED BY PUBLIC FACILITIES DEVELOPMENT PRIOR TO ISSUANCE OF BUILDING PERMITS.
13. PRIOR TO FINAL CITY INSPECTION, THE LANDSCAPE ARCHITECT SHALL SUBMIT A CERTIFICATE OF COMPLETION TO PUBLIC FACILITIES DEVELOPMENT.
14. ALL LANDSCAPE AND IRRIGATION DESIGNS SHALL MEET CURRENT CITY STANDARDS AS LISTED IN GUIDELINES OR AS OBTAINED FROM PUBLIC FACILITIES DEVELOPMENT.
15. LANDSCAPED AREAS SHALL BE DELINEATED WITH A MINIMUM SIX INCHES (6") HIGH CURB
16. APPROVED CONCEPTUAL LANDSCAPE PLAN PRIOR TO GRADING PERMIT

## SITE PLAN KEYNOTES

1. HEAVY BROOM FINISH CONC. PAVEMENT.
2. REFUSE/RECYCLING LOCATION.
3. CONCRETE WALKWAY.
4. DRIVEWAY APRONS TO BE CONSTRUCTED PER "L" DRAWINGS.
5. 5'-6"X5'-6"X4" MIN. THICK CONCRETE EXTERIOR LANDING PAD TYP. AT ALL EXTERIOR MAN DOORS TO LANDSCAPED AREAS. FINISH TO BE MEDIUM BROOM FINISH. SLOPE TO BE 1/4" TO 1/2" MAX. PROVIDE WALK TO PUBLIC WAY OR DRIVE WAY W/ 1:20 MAX. AS REQ. BY CITY INSPECTOR.
6. PROVIDE METAL, MANUAL OPERATED GATES W/ KNOX-PAD LOCK PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY.
7. 3'X7' HOLLOW METAL DOOR.
8. TRASH ENCLOSURE/REFUSE/RECYCLING LOCATION.
9. 8" WROUGHT IRON FENCE.
10. APPROXIMATE LOCATION OF TRANSFORMER.
11. TRUNCATED DOME.
12. LANDSCAPE AREA. SEE "L" DWGS.

## SITE LEGEND

- CONCRETE PAVING
- STANDARD PARKING STALL (9' X 19')
- HANDICAP PARKING STALL (9' X 19') + 5' W/ ACCESSIBLE AISLE
- HANDICAP PARKING (VAN) STALL (12' X 19') + 5' W/ ACCESSIBLE AISLE
- LANDSCAPED AREA
- PATH OF TRAVEL

## UTILITY PROVIDERS/ AGENCIES:

MUNICIPAL UTILITIES & ENGINEERING DEPARTMENT:  
CITY OF REDLANDS  
35 CAJON STREET SUITE 15A  
REDLANDS, CA 92373  
(909) 798-7584  
SEWER:  
CITY OF REDLANDS  
35 CAJON STREET SUITE 15A  
REDLANDS, CA 92373  
(909) 798-7584  
ELECTRIC:  
SEE  
ATTN: MAP REQUEST BLDG. D  
SANTA ANA, CA 92711-198  
(714) 796-9999

GAS:  
SEE  
ATTN: MAP REQUEST BLDG. D  
SANTA ANA, CA 92711-198  
(714) 796-9999  
TELEPHONE:  
FRONTIER COMMUNICATIONS  
914 4TH STREET  
REDLANDS, CA 92373  
(909) 748-6640

THE SOUTH ONE HALF OF LOT 15 OF THE SOUTH ONE-HALF OF THE WEST 34 FEET OF LOT 16, BLOCK 2, ACCORDING TO MAP NO.1 OF HENRY L. WILLIAMS TRACT, IN THE COUNTY OF SAN BERNARDINO, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 2, PAGE 19 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDED OF SAID COUNTY.

EXCEPTING THEREFROM THAT PORTION OF SAID LOT 16, DESCRIBED AS FOLLOWS:

COMMENCING AT A POINT WHICH IS 251 FEET NORTH OF THE NORTH LINE OF SAN BERNARDINO AVENUE AND 619 FEET WEST OF THE WEST LINE OF ALABAMA STREET, AS SHOWN ON THE MAP OF SAID TRACT, THENCE NORTH 32 FEET; THENCE WEST 20 FEET; THENCE SOUTH 32 FEET; THENCE EAST 20 FEET TO THE POINT OF BEGINNING.

ALSO EXCEPTING THEREFROM THE SOUTH 80.00 FEET OF LOT 15 AND THE SOUTH 80.00 FEET OF THE WEST 34.00 FEET OF LOT 16, BOTH OF SAID LOTS BEING IN BLOCK 2, ACCORDING TO MAP NO. 1 OF HENRY L. WILLIAMS TRACT, IN THE COUNTY OF SAN BERNARDINO, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 2, PAGE 19 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDED OF SAID COUNTY.

## EXISTING EASEMENTS:

[6] EASEMENT(S) FOR THE PURPOSE(S) SHOWN BELOW AND RIGHTS INCIDENTAL THERETO, AS GRANTED IN A DOCUMENT:

GRANTED TO: FAIRVIEW WATER COMPANY, A CORPORATION  
PURPOSE: PIPE LINE AND ELECTRICAL TRANSMISSION LINE  
RECORDING DATE: JANUARY 19, 1948  
RECORDING NO.: BOOK 2108, PAGE 433 OF OFFICIAL RECORDS  
AFFECTS: AS DESCRIBED IN SAID DOCUMENT  
[10 INCH PIPELINE AS REFERENCED IN DOCUMENT CANNOT BE LOCATED FROM RECORD. 3 FOOT ELECTRICAL EASEMENT AS REFERENCED IN DOCUMENT IS APPROXIMATELY LOCATED HEREON, HOWEVER, THE PRECISE LOCATION CANNOT BE DETERMINED FROM RECORD]

## PROJECT

CONCRETE TILT-UP BUILDING  
BUILDING OCCUPANCY: OFFICE & WAREHOUSE  
CONSTRUCTION TYPE: AUTOMATIC FIRE SPRINKLER  
S-1/B  
III-B  
YES  
ACTUAL AREA  
ACTUAL AREA (BASIC)  
ACTUAL AREA INCREASED  
W/ 60" MIN. YARD ON 4 SIDES  
BLDG: 190,086 S.F.  
S 1" = 17,500 S.F. / B = 19,000 S.F.  
UNLIMITED, PER SECTION 507.3

## PROJECT INFORMATION

Owner  
NEWCASTLE PARTNERS  
4740 GREEN RIVER ROAD, STE 118  
CORONA, CA 92880  
TEL: 951-582-9800  
FAX: 951-278-4740  
ATTN: JACKSON B. SMITH

Applicant  
NEWCASTLE PARTNERS  
4740 GREEN RIVER ROAD, STE 118  
CORONA, CA 92880  
TEL: 951-582-9800  
FAX: 951-278-4740  
ATTN: JACKSON B. SMITH

## Architect

HPA  
18831 BARDEEN AVE, STE #100  
IRVINE, CA 92612  
TEL: (949) 862-2116  
CONTACT: HOON KEUN PARK

## Assessors Parcel Number

0292-051-21

## Zoning Information

ZONING DESIGNATION:  
EAST VALLEY/SPECIAL DEVELOPMENT (EV/SD)

CONDITIONAL USE PERMIT FOR 190,086 S.F.  
WAREHOUSE/DISTRIBUTION CENTER

OVERALL SITE PLAN  
scale: 1"=30'-0"

SCALE: 1"=30'-0"

0' 30' 60' 90'



## LEGAL DESCRIPTION



## EXHIBIT B

### Findings

**PROJECT FINDINGS:** Conditional Use Permit to construct a 190,086-square foot industrial warehouse distribution center with 10,000 square feet of office/administrative uses (Project), located on the north side of San Bernardino Avenue, approximately 590 feet west of Alabama Avenue, on 8.5 acres, in the East Valley/Special Development (EV/SD) zoning district, in the East Valley Area Plan.

1. The site for the proposed use is adequate in terms of shape and size to accommodate the proposed use and all landscaping, open spaces, setbacks, walls and fences, yards, and other required features pertaining to the application. All setbacks meet the requirements of the Development Code for the proposed land use and the existing zoning. The submitted Project plans shows adequate design, parking, landscaping, circulation, access, and setbacks and is compatible with the existing development in the area.
2. The site for the proposed use has adequate access, which means that the site design incorporates appropriate street and highway characteristics to serve the proposed use. Access to the Project site is provided with two standard commercial/industrial driveways located on San Bernardino Avenue, which will provide legal and physical access to the site and appropriate regional circulation mitigation has been required. On-site circulation drive aisles meet County Fire Department Standards.
3. The proposed use will not have a substantial adverse effect on abutting properties or the allowed use of the abutting properties, which means that the use will not generate excessive noise, traffic, vibration, lighting, glare, or other disturbance. The Project has been designed to use building materials, colors and landscaping including shades of white, and gray, with blue glazing on the windows facing San Bernardino Avenue that are complementary to the existing warehouse facilities to the north, east and west. The Project design includes a 60-foot landscape buffer and building features for screening truck, staging, and loading activities that further enhance the overall aesthetic quality of the development.
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 proposed Conditional Use Permit site plan, together with the provisions for its design and improvement are consistent with the County General Plan. The Project specifically implements the following goals and policies:

General Plan Goal LU 4: The unincorporated communities within the County will be sufficiently served by industrial land uses.

- Goal Implementation: The proposed Project provides additional industrial development opportunities in the East Valley Plan Area.

General Plan Goal LU 9: Development will be in a contiguous manner as much as possible to minimize environmental impacts, minimize public infrastructure and service costs, and further countywide economic development goals.

General Plan Policy LU 9.1: Encourage infill development in unincorporated areas and sphere of influence (SOI) areas.

Goal ED 1: The County will have a vibrant and thriving local economy that spans a variety of industries, services, and other sectors.

Goal ED 4: The County will assist development of small businesses and encourage new businesses of all sizes.

ED 19.1: Retain and expand trucking, warehousing, and distribution opportunities.

GOAL V/ED 1. Promote economic development that is compatible with the land use patterns and environment of the Valley Region.

POLICY V/ED 1.1. Support commercial and industrial development that is compatible with surrounding development and does not disrupt the land use patterns and environment of the Valley Region.

The Project is located within the boundary of the East Valley Area Plan. Additionally, Circulation/Site Design and Site Design Standards and Guidelines of the East Valley Area Plan support approval of the Project.

- All development proposals shall be designed so as to provide for a free flow of vehicles in and out of the site as well as for easy access to the various activity areas within each site. (EV.0320 (E)).
- Adequate provisions shall be made for emergency vehicle access, with a minimum of two (2) points of ingress and egress provided to each site. (EV.0320 (H)).
- No Loading facilities shall be located at the front of the structure; loading facilities shall be permitted only in the rear and interior side yard areas. (EV.0330 – Site Design Standards and Guidelines).
- Loading facilities shall be adequately screened from the public view by use of walling, landscaping or building design. (EV.0330 – Site Design Standards and Guidelines).
- Floor Area Ratios (FAR) provide unique design flexibility in determining whether a low building covering most of a lot is beneficial or whether a taller building covering a small portion of the lot is appropriate. Maximum FAR for any use within the Planning Area area shall be established as follows: Industrial buildings: .8 of the total lot area.

The Project will not conflict with any applicable adopted land use plan, policy, or regulation or an agency with jurisdiction over the Project.

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. The developer will be required to construct road improvements, as well as contribute to the Regional Transportation Mitigation Facilities Fee Plan to provide other needed improvements in the area. The use will not substantially interfere with the present or future ability to use solar energy systems.
6. The lawful conditions stated in the approval are deemed reasonable and necessary to protect the overall public health, safety and general welfare because the conditions of approval include measures to reduce air quality and traffic impacts and enforce performance standards of the County Development Code.
7. The design of the Project 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 with adequate building setbacks and the future ability to construct rooftop solar facilities.



8. There is no substantial evidence that the Project will have a significant effect on the environment because an Initial Study has been completed for the proposed Project and it is determined, on the basis of staff's independent evaluation, that the Project will not have a significant adverse impact on the environment with the implementation of all the conditions of approval and environmental mitigation measures. The Mitigated Negative Declaration for this Project reflects the County's independent judgment in making this decision. Therefore, adoption of a Mitigated Negative Declaration is recommended.

## **EXHIBIT C**

### Conditions of Approval

**EXHIBIT C**  
**CONDITIONS OF APPROVAL**  
Redlands Commerce Center P201700142

**GENERAL REQUIREMENTS**  
Ongoing and Operational Conditions

**LAND USE SERVICES – Planning Division 909.387.8311**

1. **Project Description.** This Conditional Use Permit approval is for the construction of an 190,086-square foot industrial warehouse building with 10,000 square feet of office area to be used as a warehouse distribution facility on 8.45 acres, in the Special Development (EV/SD) zoning district, in compliance with the San Bernardino County Code (SBCC), California Building Codes, San Bernardino County Fire Code, California Fire Code, the Conditions of Approval, the approved site plan, and all other required and approved reports and displays (e.g. elevations and landscape plans).
2. **Project Location.** The Project site is located on the north side of San Bernardino, approximately 600 feet west of Alabama Street, in the East Valley Specific Plan.
3. **Conditions of Approval:** The developer shall provide a copy of the approved conditions and the site plan to every current and future commercial tenant, lessee, and any future property owner to facilitate compliance with these conditions of approval and continuous use requirements for the Project Site with APN: 0292-051-21 and Project Number: P201700142.
4. **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 structures, building locations, elevations, signs, parking allocation, landscaping, lighting, allowable number of occupants (clients and/or employees); or a proposed change in the conditions of approval, including operational restrictions from those shown either on the approved site plan and/or in the conditions of approval shall require that an additional land use application (e.g. Revision to an Approved Action) be approved 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)
5. **Continuous Effect/Revocation.** All Conditions of Approval applied to this project shall be effective continuously throughout the operative life of the project for the approved use. Failure of the property owner, tenant, applicant, developer or any operator to comply with any or all of the conditions at any time may result in a public hearing and revocation of the approved land use, provided adequate notice, time and opportunity is provided to the property owner or other party to correct the non-complying situation.
6. **Indemnification.** In compliance with SBCC §81.01.070, the developer shall agree to defend, indemnify and hold harmless the County or its "indemnities" (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 the 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's 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 indemnitee's "passive" negligence but does not apply to the indemnitee's "sole" or "active" negligence" or "willful misconduct" within the meaning of Civil Code Section 2782.

7. Expiration. This project permit approval shall expire and become void if it is not "exercised" within three years of the effective date of this approval, unless an extension of time is granted. 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]

Occupancy of completed structures and operation of the approved 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:

- Building and Safety does not issue construction permits for all or part of the project or the construction permits expire before the completion of the structure and the final inspection approval.
- The County determines the land use to be abandoned or non-conforming.
- The County determines that the land use is 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 the expiration date. The developer is responsible for initiation of any Extension of Time application.

8. Extension of Time. County staff may grant extensions of time to the expiration date (listed above or as otherwise extended) in increments each not to exceed an additional three years beyond the current expiration date. The developer may file an application to request consideration of an extension of time with appropriate fees no less than 30 days before the expiration date. County staff may grant extensions of time based on a review of the Time application, which must include 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)
9. Development Impact Fees. Additional fees may be required prior to issuance of development permits. Fees shall be paid as specified in adopted fee ordinances.
10. Project Account. The Job Costing System (JCS) account number is P201700142. This is an actual cost project with a deposit account to which hourly charges are assessed. The developer shall maintain a positive account balance at all times. A minimum balance of \$1000 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. There shall be sufficient funds remaining in the account to properly fund file closure and any other required post-occupancy review and inspection (e.g. landscape performance).
11. 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:
- a) Grading Permits: a copy of the signed CCRF for grading/land disturbance and two "red" stamped and signed approved copies of the grading plans.
  - b) Building Permits: a copy of the signed CCRF for building permits and three "red" stamped and signed approved copies of the final approved site plan.
  - c) 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 County Planning.

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12. Additional Permits. The property owner, developer, and land use operator are all responsible to ascertain and comply with all laws, ordinances, regulations and any other requirements of Federal, State, County and Local agencies as are applicable to the development and operation of the approved land use and project site. These may include:
- a) FEDERAL: None
  - b) STATE: Regional Water Quality Control Board (RWQCB) - Santa Ana Region
  - c) COUNTY: Land Use Services – Planning/Building and Safety/Code Enforcement/Land Development, County Fire, Environmental Health Services, and Public Works, South Coast Air Quality Management District, San Bernardino International Airport Authority (Avigation Easement), City of Redlands by special agreement provides water, sewer, sanitation, police and fire services to this area.
13. 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 Planning Division review and approval. Markings and signs shall be clearly defined, un-faded and legible; these include parking spaces, disabled parking and path of travel, directional 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.
14. Performance Standards. The approved land uses shall operate in compliance with the general performance standards listed in SBCC 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. In addition to these, none of the following shall be perceptible without instruments at any point outside the project boundaries at adjoining property lines:
- a) Odors: No offensive or objectionable odor.
  - b) Emissions: No emission of dirt, dust, fly ash and other forms of particulate matter.
  - c) Smoke: No smoke of a greater density than that described in No. 2 on the Ringelmann Smoke Chart, as published currently by the United States Bureau of Mines, shall be emitted from any project source.
  - d) Radiation: No dangerous amount of radioactive emissions.
  - e) Toxic Gases: No emission of toxic, noxious or corrosive fumes of gases.
  - f) Glare: No intense glare that is not effectively screened from view at any point outside the project boundary.

15. Lighting. The glare from any luminous source, including on-site lighting shall not exceed one-half (0.5) foot-candle at property line. 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 alternating no more than once every five seconds.
16. 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.
17. Water Conservation. Structures shall incorporate interior and exterior water conservation measures (low-flow plumbing, water efficient landscaping, drip irrigation, minimization of turf areas, etc.) as required by the SBCC.
18. Construction Hours. Construction will be limited to the hours between 7:00 AM and 7:00 PM, Monday through Saturday in accordance with the SBCC standards. No construction activities are permitted outside of these hours or on Sundays and Federal holidays.
19. 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. All signs shall comply with SBCC Chapter 83.13, Sign Regulations, SBCC §83.07.040, Glare and Outdoor Lighting Mountain and Desert Regions, and SBCC Chapter 82.19, Open Space Overlay as it relates to Scenic Highways (§82.19.040), in addition to the following minimum standards:
  - a. All signs shall be lit only by steady, stationary shielded light; exposed neon is acceptable.
  - b. All sign lighting shall not exceed 0.5 foot-candle.
  - c. No sign or stationary light source shall interfere with a driver's or pedestrian's view of public right-of-way or in any other manner impair public safety.
  - d. Monument signs shall not exceed four feet above ground elevation and shall be limited to one sign per street frontage.
20. 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.
21. 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.
22. AQ/Operational Standards. The developer shall implement the following air quality measures, during operation of the approved land use: All on-site equipment and vehicles (off-road/ on-road), shall comply with the following:
  - a) County Diesel Exhaust Control Measures [SBCC § 83.01.040 (c)]
  - b) Signs shall be posted requiring all vehicle drivers and equipment operators to turn off engines when not in use.
  - c) All engines shall not idle more than five minutes in any one-hour period on the project site. This includes all equipment and vehicles.
  - d) On-site electrical power connections shall be provided.
  - e) All transportation refrigeration units (TRU's) shall be provided electric connections, when parked on-site.
  - f) The loading docks shall be posted with signs providing the telephone numbers of the building facilities manager and the California Air Resources Board to report violations.



23. Truck Queues. All commercial vehicles are restricted from queuing in excess of 5 minutes on San Bernardino Avenue ingress/egress points to minimize diesel particulate emissions to sensitive receptor sites.
24. Local Labor. The Developer and future operators of the Project shall make a good faith effort to employ residents of San Bernardino County for the construction and operation of the Project. Good faith efforts shall include but not be limited to utilizing local advertising and outreach for employee recruitment.

**LAND USE SERVICES DEPARTMENT – Code Enforcement Division 909.387.8311**

25. Enforcement. If any County agency is 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.
26. Weed Abatement. The Applicant shall comply with San Bernardino County weed abatement regulations [SBCC §23.031-23.043] 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**

27. Tributary Drainage. Adequate provisions should be made to intercept and conduct the tributary off-site/on-site 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.
28. Natural Drainage. The natural drainage courses traversing the site shall not be occupied or obstructed.
29. Additional Drainage Requirements. In addition to drainage requirements stated herein, other on-site and/or off-site improvements may be required that 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.
30. 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 Water Quality Management Plan (WQMP) for the project. This includes but is not limited to, filter material replacement and sediment removal, as required to assure peak performance of all BMPs. Furthermore, such maintenance activity will require compliance with all Local, State, or Federal laws and regulations, including those pertaining to confined space and waste disposal methods in effect at the time such maintenance occurs.
31. 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 County 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.

**PUBLIC HEALTH – Environmental Health Services 800.442.2283**

32. Noise. 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.
33. Refuse Storage/Removal. All refuse generated at the premises shall at all times be stored in approved containers and shall be placed in a manner so that visual or other impacts and environmental public health nuisances are minimized. All refuse not containing garbage shall be removed from the premises at least one 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 times per week, or as often as necessary to minimize public health nuisances, by a permitted hauler to an approved solid waste

facility in conformance with SBCC Chapter 8, §33.0830 et. seq. For information, please call DEHS/LEA at: 1-800-442-2283.

**DEPARTMENT OF PUBLIC WORKS – Traffic Division 909.387.8186**

- 34. The westerly project driveway shall be restricted to right-in/right-out movements only.
- 35. Project vehicles shall not back out into the public roadway.

**DEPARTMENT OF PUBLIC WORKS – Solid Waste Management 909.386.8961**

- 36. 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).
- 37. 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 AB 2176.
- 38. Mandatory Commercial Recycling. Beginning July 1, 2012, all businesses defined to include a commercial or public entity that generates four or more cubic yards of commercial solid waste a week or is a multi-family residential dwelling of five or more must arrange for recycling services. The County is required to monitor business recycling and will require the business to provide recycling information. This requirement is to assist the County in compliance with the recycling requirements of AB 341.
- 39. Mandatory Organics Recycling – As of April 2016, the State of California through AB 1826 (Enacted October 2014), requires businesses that generate eight (8) cubic yards of organics 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 though 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.

**COUNTY FIRE DEPARTMENT – Community Safety Division (760) 995-8190 / (909) 386-8465/LOCAL FIRE JURISDICTION**

- 40. Fire 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 Uniform Fire Code requirements and all applicable statutes, codes, ordinances and standards of the Fire Department.
- 41. High Piled. This review did not include analysis of any rack or high piled combustible storage to be present. If there is to be any high piled or rack storage present (including plastics storage greater than 6 feet), the applicant must provide storage plans and a letter to identify the commodities to be present.
- 42. Fire Fee. The required fire fees (currently \$1,598) shall be paid to the San Bernardino County Fire Department/Community Safety Division. (909) 386-8400. This fee is in addition to fire fees that are paid to the City of Redlands.
- 43. Construction Permits. Construction permits, including Fire Condition Letters, shall automatically expire and become invalid unless the work authorized by such permit is commenced within 180 days after its issuance, or if the work authorized by

such permit is suspended or abandoned for a period of 180 days after the time the work is commenced. Suspension or abandonment shall mean that no inspection by the Department has occurred with 180 days of any previous inspection. After a construction permit or Fire Condition Letter, becomes invalid and before such previously approved work recommences, a new permit shall be first obtained and the fee to recommence work shall be one-half the fee for the new permit for such work, provided no changes have been made or will be made in the original construction documents for such work, and provided further that such suspension or abandonment has not exceeded one year. A request to extend the Fire Condition Letter or Permit may be made in writing PRIOR TO the expiration date justifying the reason that the Fire Condition Letter should be extended.

44. Additional Requirements. In addition to the Fire requirements stated herein, other on-site and 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.

**PUBLIC HEALTH – Environmental Health Services 800.442.2283**

45. Noise. 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.
46. 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 **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 **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.

**PRIOR TO ISSUANCE OF GRADING PERMITS OR LAND DISTURBING ACTIVITY**

The Following Shall Be Completed

**LAND USE SERVICES DEPARTMENT – Planning Division 909.387.8311**

47. AQ – Operational Standards. The developer shall implement the following air quality measures, during operation of the approved land use: All on-site equipment and vehicles (off-road/ on-road), shall comply with the following:
- a) County Diesel Exhaust Control Measures [SBCC § 83.01.040 (c)]. Signs shall be posted requiring all vehicle drivers and equipment operators to turn off engines when not in use. All engines shall not idle more than five minutes in any one-hour period on the project site. This includes all equipment and vehicles.
  - b) On-site electrical power connections shall be provided.
  - c) All transportation refrigeration units (TRU's) shall be provided electric connections, when parked on-site.
  - d) The loading docks shall be posted with signs providing the telephone numbers of the building facilities manager and the California Air Resources Board to report violations.
48. AQ – Dust Control Plan. The developer shall prepare, submit for review and obtain approval from County Planning of both a Dust Control Plan (DCP) consistent with SCAQMD guidelines and a signed letter agreeing to include in any construction contracts/subcontracts a requirement that project contractors adhere to the requirements of the DCP. The DCP shall include the following requirements:
- a) Exposed soil shall be kept continually moist to reduce fugitive dust during all grading and construction activities, through application of water sprayed a minimum of two times each day.
  - b) During high wind conditions (i.e., wind speeds exceeding 25 mph), areas with disturbed soil shall be watered hourly and activities on unpaved surfaces shall cease until wind speeds no longer exceed 25 mph.
  - c) Storage piles that are to be left in place for more than three working days shall be sprayed with a non-toxic soil binder, covered with plastic or revegetated.
  - d) Storm water control systems shall be installed to prevent off-site mud deposition.
  - e) All trucks hauling dirt away from the site shall be covered.
  - f) Construction vehicle tires shall be washed, prior to leaving the project site.

- g) Rumble plates shall be installed at construction exits from dirt driveways.
  - h) Paved access driveways and streets shall be washed and swept daily when there are visible signs of dirt track-out.
  - i) Street sweeping shall be conducted daily when visible soil accumulations occur along site access roadways to remove dirt dropped or tracked-out by construction vehicles. Site access driveways and adjacent streets shall be washed daily, if there are visible signs of any dirt track-out at the conclusion of any workday and after street sweeping.
49. AQ – Construction Standards. The developer shall submit for review and obtain approval from County Planning of a signed letter agreeing to include as a condition of all construction contracts/subcontracts requirements to reduce vehicle and equipment emissions and other impacts to air quality by implementing the following measures and submitting documentation of compliance: The developer/construction contractors shall do the following:
- a) Provide documentation prior to beginning construction demonstrating that the project will comply with all SCAQMD regulations including 402, 403, 431.1, 431.2, 1113 and 1403.
  - b) Each contractor shall certify to the developer prior to construction-use that all equipment engines are properly maintained and have been tuned-up within last 6 months.
  - c) Each contractor shall minimize the use of diesel-powered vehicles and equipment through the use of electric, gasoline or CNG-powered equipment. All diesel engines shall have aqueous diesel filters and diesel particulate filters.
  - d) All gasoline-powered equipment shall have catalytic converters.
  - e) Provide onsite electrical power to encourage use of electric tools.
  - f) Minimize concurrent use of equipment through equipment phasing.
  - g) Provide traffic control during construction to reduce wait times.
  - h) Provide on-site food service for construction workers to reduce offsite trips.
  - i) Implement the County approved Dust Control Plan (DCP)
  - j) Suspend use of all construction equipment operations during second stage smog alerts. NOTE: For daily forecast, call (800) 367-4710 (San Bernardino and Riverside Counties).
50. AQ – Coating Restriction Plan. The developer shall submit for review and obtain approval from County Planning of a Coating Restriction Plan (CRP), consistent with SCAQMD guidelines and a signed letter agreeing to include in any construction contracts/subcontracts a condition that the contractors adhere to the requirements of the CRP. The CRP measures shall be following implemented to the satisfaction of County Building and Safety:
- a) Architectural coatings with Reactive Organic Compounds (ROC) shall not have content greater than 100 g/l.
  - b) Architectural coating volume shall not exceed the significance threshold for ROG, which is 75 lbs. /day and the combined daily ROC volume of architectural coatings and asphalt paving shall not exceed the significance threshold for ROC of 75 lbs. per day.
  - c) High-Volume, Low Pressure (HVLP) spray guns shall be used to apply coatings.
  - d) Precoated/natural colored building materials, water-based or low volatile organic compound (VOC) coatings shall be used, if practical.
  - e) Comply with SCAQMD Rule 1113 on the use or architectural coatings.
51. BIO 1. Burrowing Owl Pre-construction Survey: *A qualified biologist shall conduct a pre-construction presence/absence survey for burrowing owls within 30 days prior to site disturbance. If burrowing owls are detected on site, then a plan for exclusion or avoidance shall be made in coordination with CDFW. If the survey is negative, the project may proceed without further restrictions related to burrowing owls. [Mitigation Measure IV-1] Prior to Grading Permits/Planning*
- The results of the survey shall be submitted to the County of San Bernardino and the California Department of Fish & Wildlife (CDFW) within 14 days following completion. If active burrows are detected, protective measures shall be required to ensure compliance with the Migratory Bird Treaty Act (MBTA) and other applicable California Department of Fish and Game (CDFG) Code requirements:*
- a. *In the event that the pre-construction survey identifies no burrowing owls in the impact area, a grading permit may be issued without restriction.*
  - b. *In the event that the pre-construction survey identifies the presence of at least one Individual but less than three (3) mating pairs of burrowing owl, then prior to the issuance of a grading permit and prior to the commencement of ground-disturbing activities on the property, the qualified biologist shall passively or*



actively relocate any burrowing owls. Passive relocation, including the required use of one-way doors to exclude owls from the site and the collapsing of burrows, will occur if the biologist determines that the proximity and availability of alternate habitat is suitable for successful passive relocation. Passive relocation shall follow California Department of Fish and Wildlife relocation protocol. If proximate alternate habitat is not present as determined by the biologist, active relocation shall follow California Department of Fish and Wildlife relocation protocol. The biologist shall confirm in writing to the County of San Bernardino Planning Department that the species has fledged or been relocated prior to the issuance of a grading permit.

52. BIO 2. Nesting Bird Survey: As a condition of approval for all grading permits, vegetation clearing, or ground disturbance, within 30 days prior to such activities occurring during the nesting/breeding season (January 15 through August 31), a migratory bird nesting survey must be completed in accordance with the following requirements:

- a. A migratory nesting bird survey of the Project's impact footprint shall be conducted by a qualified biologist within three business (3) days prior to initiating vegetation clearing or ground disturbance.
- b. A copy of the migratory nesting bird survey results report shall be provided to the County of San Bernardino Planning Department. If the survey identifies the presence of active nests, then the qualified biologist shall provide the Planning Department with a copy of maps showing the location of all nests and an appropriate buffer zone around each nest sufficient to protect the nest from direct and indirect impact. The size and location of all buffer zones, if required, shall be subject to review and approval by the Planning Department and shall be no less than a 300-foot radius around the nest for non-raptors and a 500-foot radius around the nest for raptors. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved buffer zone shall be marked in the field with construction fencing, within which no vegetation clearing or ground disturbance shall commence until the qualified biologist and Planning Department verify that the nests are no longer occupied and the juvenile birds can survive independently from the nests.

*[Mitigation Measure IV BIO1 – IV BIO2] - Prior to Grading Permit/Planning*

53. Cultural Resources Monitoring:

CR-1. 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. *[Mitigation Measure V-1] During Grading*

CR-2. In the event that Native American cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, San Manuel Band of Mission Indians will be contacted if any such find occurs and be provided information and permitted/invited to perform a site visit when the archaeologist makes his/her assessment, so as to provide Tribal input. *[Mitigation Measure V-2] During Grading*

CR-3 If significant Native American historical resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, an SOI-qualified archaeologist shall be retained to develop a cultural resources Treatment Plan, as well as a Discovery and Monitoring Plan, the drafts of which shall be provided to San Manuel Band of Mission Indians for review and comment.

- a. All in-field investigations, assessments, and/or data recovery enacted pursuant to the finalized Treatment Plan shall be monitored by a San Manuel Band of Mission Indians Tribal Participant(s).
- b. The Lead Agency and/or applicant shall, in good faith, consult with San Manuel Band of Mission Indians on the disposition and treatment of any artifacts or other cultural materials encountered during the project.

*[Mitigation Measure V-3] During Grading*

54. All recommendations/Conditions of Approval (Numbers 1 – 11) contained within the Geotechnical Report Review Sheet prepared by Steven Kupferman, dated August 8, 2017 shall be incorporated prior to initiating ground disturbing activities.

55. The "developer" shall submit and obtain approval from County Planning of a signed letter agreeing to include as a condition of all construction contracts/subcontracts requirements to reduce noise impacts during construction, which shall include the following vehicle and equipment emissions and other impacts to air quality by implementing the following measures and submitting documentation of compliance: The developer/construction contractors shall do the following:
- a) During the project site excavation and grading, the construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with the manufactures standards.
  - b) The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the project site.
  - c) The construction contractor shall limit all construction-related activities that would result in high noise levels between the hours of 7:00 a.m. and 6:00 p.m., Monday through Saturday excluding holidays.
  - d) The construction contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise sensitive receptors nearest the project site during all project construction.
  - e) The construction contractor shall limit haul truck deliveries to the same hours specified for construction equipment. To the extent feasible, haul routes shall not pass sensitive land uses or residential dwellings.

**LAND USE SERVICES DEPARTMENT – Building and Safety Division 909.387.8311**

56. 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.
57. Grading Plans: Grading plans shall be submitted to Building and Safety for review and approval prior to grading/land disturbance of more than 50 Cu Yards.
58. Erosion & Sediment Control Plan. An erosion and sediment control plan shall be submitted to and approved by the Building Official.
59. Erosion Control Installation. An erosion control permit shall be obtained and devices installed prior to any land disturbance. No sediment is to leave the job site.
60. 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](http://www.swrcb.ca.gov)
61. Regional Board Permit Letter: 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.

**LAND USE SERVICES DEPARTMENT – Land Development Division – Drainage Section 909.387.8311**

62. Drainage Improvements. A Registered Civil Engineer (RCE) shall investigate and design adequate drainage improvements to intercept and conduct the off-site and on-site drainage flows around and through the site in a manner, which will not adversely affect adjacent or downstream properties. Submit drainage study for review and obtain approval. A \$550 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.
63. Topo Map. A topographic map shall be provided to facilitate the design and review of necessary drainage facilities.
64. Grading Plans. Grading plans shall be submitted for review and approval obtained, prior to construction. All Drainage improvements shall be shown on the Grading plans according to the approved Drainage study. 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.
65. On-site Flows. On-site flows need to be directed to the drainage facilities unless a drainage acceptance letter is secured from the adjacent property owners and provided to Land Development.

66. WQMP. A completed Water Quality Management Plan (WQMP) shall be submitted for review and approval obtained. A \$2,650 deposit for WQMP review will be collected upon submittal to the Land Development Division. The report shall adhere to the current requirements established by the Santa Ana Watershed Region. Copies of the WQMP guidance and template can be found at: (<http://www.sbcounty.gov/dpw/land/npdes.asp>) .
67. WQMP Inspection Fee. The developer shall provide a \$3,600 deposit to Land Development Division for inspection of the approved WQMP. Deposit amounts are subject to change in accordance with the latest approved fee schedule.

**COUNTY FIRE DEPARTMENT – Community Safety Division (760) 995-8190 / (909) 386-8465/LOCAL FIRE JURISDICTION**

68. Access. The development shall have a minimum of 2 points of vehicular access. These are for fire/emergency equipment access and for evacuation routes.
69. Water System Large Commercial. A water system approved and inspected by the Fire Department is required. The system shall be operational, prior to any combustibles being stored on the site. The applicant is required to provide a minimum of one new six (6) inch fire hydrant assembly with one (1) two and one half (2 1/2) inch and two (2) four (4) inch outlet. All fire hydrants shall be spaced no more than three hundred (300) feet apart (as measured along vehicular travel-ways) and no more than one hundred fifty (150) feet from any portion of a structure.
70. Fire Flow Test. Your submittal did not include a flow test report to establish whether the public water supply is capable of meeting your project fire flow demand. You will be required to either produce a current flow test report from your water purveyor demonstrating that the fire flow demand is satisfied or you must install an approved fire sprinkler system. This requirement shall be completed prior to combination inspection by Building and Safety.
71. Combustible Protection. Prior to combustibles, being placed on the project site an approved paved road with curb and gutter and fire hydrants with an acceptable fire flow shall be installed. The topcoat of asphalt does not have to be installed until final inspection and occupancy.

**DEPARTMENT OF PUBLIC WORKS – Surveyor 909.387.8149**

72. Monumentation. If any activity on this project will disturb any land survey monumentation, including be 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 to Section 8771(b) Business and Professions Code.
73. A Record of Survey per Section 8762 of the Business and Professions Code is required due to the Site Plan showing bearings and distances which are not of record.

**PRIOR TO ISSUANCE OF BUILDING PERMITS**  
The Following Shall Be Completed

**LAND USE SERVICES DEPARTMENT – Planning Division 909.387.8311**

74. 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.

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75. Trash/Recyclables Receptacles. All trash and recyclables receptacles shall be in compliance with Public Works, Solid Waste Management standards. They shall be enclosed by six-foot high masonry walls with steel gates. A concrete apron equal to the width of the gate and outward from the enclosure a minimum of six feet shall be provided.
76. 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.
77. Landscape and Irrigation Plan. Landscape and Irrigation Plans shall be prepared in conformance with Chapter 83.10, Landscaping Standards, of the County Development Code, as well as the Blooming Community Plan requirements. The developer shall submit four copies of a landscape and irrigation plan to County Planning.
78. 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 provides an incentive to use alternative transportation modes that access the area.
79. San Bernardino Avenue Landscape and Development Standards. San Bernardino Avenue is designated as a major east-west thoroughfare connecting the cities of Redlands and San Bernardino. The intent of the landscape guidelines for San Bernardino Avenue is to extend the palm row landscape element, enhance the identity of the East Valley Corridor on a major roadway, and create an aesthetic buffer between the street and planned commercial and industrial uses. The proposed project shall include the following landscape and design standards with respect to San Bernardino Avenue:
- Setbacks. Front building setback line (from property line) is 30 feet (average). The front parking setback line is 15 feet. Berms or other screening is required where parking is visible from the public right-of-way.
  - Sidewalks. Six (6') foot straight sidewalk, and eight (8') feet from back of curb shall be provided.
  - Street Trees. New Planting of single row of Washingtonia robusta on each side of roadway between curb and sidewalk, planted forty (40') feet on center. Camphor trees (Cinnamomum camphora) planted in landscaped setback area on regular spacing, in triangular pattern with palm rows. Salvage and relocate existing mature palms as roadway is widened.
80. Energy Efficiency for Commercial/Industrial Development (GHG Reduction Measure R2E7). The developer shall document that the design of the proposed structure exceeds the current Title 24 energy efficiency requirements as indicated below:
- Building Envelope:
- Insulation – Modestly enhanced insulation (walls R-13, Roof/attic R-38) (15 points).
  - Windows – Modestly Enhanced Window Insulation (0.4 U-factor, 0.32 SHGC) (8 points).
  - Cool Roof – Modest Cool Roof (CRRC Rated 0.15 aged solar reflectance, 0.75 thermal emittance) (12 points).
- Indoor Space Efficiencies:
- Heating/Cooling Distribution System – Distribution loss reduction with inspection (HERS Verified duct Leakage or equivalent) (14 points).
  - Daylighting – All rooms daylighted (7 points).
  - Artificial Lighting – Efficient lights (25% of in-unit fixtures considered high efficacy. High efficacy is defined as 40 lumens/watt for 15 watt or less fixtures; 50 lumens/watt for 15-40 fixtures, 60 lumens/watt for fixtures > 40 watts) (9 points).
  - Appliances – Star commercial refrigerator (new) (8 points).
- Miscellaneous Commercial/Industrial Building Efficiencies:
- Build Placement - North/south alignment of building or other building placement such that the orientation of the buildings optimizes conditions for natural heating, cooling, and lighting (6 points).

81. New Commercial/Industrial Renewable Energy (GHG Reduction Measure R2E9). The project shall be designed to have solar ready roof (sturdy roof and electric hookups) (2 points).
82. Per Capita Water Use Reduction Commercial/Industrial (GHG Reduction Measure R2WC1) The developer shall document that the design of the proposed structure provide efficiency requirements as indicated below:
- Irrigation and Landscaping:
- Water Efficient Landscaping – Only low water using plants (4 points).
  - Water Efficient irrigation Systems – Low precipitation spray heads <75" / Hr. or drip irrigation (1 point).
  - Recycled Water – Recycled water connection (purple pipe) to irrigation system on site (5 points).
- Potable Water:
- Commercial Dishwashers - Water Efficient dishwashers (20% water savings) (4 points).
83. Renewable Fuel/Low Emission Vehicles (EV Charging Stations) (GHG Reduction Measure R2T5). The project shall provide public charging station for use by an electric vehicle (10 points).

**LAND USE SERVICES DEPARTMENT – Building and Safety Division 909.387.8311**

84. Temporary Use Permit: 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.
85. Avigation Agreement. 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.
86. 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.

**LAND USE SERVICES DEPARTMENT – Land Development Division – Road Section 909.387.8311**

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

**San Bernardino Avenue (Major Arterial – 120')**

- Road Dedication. A 20 foot grant of easement is required to provide a half-width right-of-way of 60 feet.
  - Street Improvements. Design curb and gutter with match up paving 52 feet from centerline.
  - Sidewalks. Design sidewalks per County Standard 109 Type "B" modified. Per East Valley Area Plan, the sidewalk shall be 6' wide with an 8' parkway between curb and sidewalk with adequate easement to accommodate.
88. 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.
89. Street Improvement Plans. The developer shall submit for review and obtain approval of street improvement plans prior to construction. 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. Street improvement plans shall not be approved until all necessary right-of-way is acquired.



90. Construction Permits. Prior to installation of road and drainage improvements, a construction permit is required from County Public Works, Transportation Operations Division, Permit Section, (909) 387-8046, 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.
91. 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.
92. 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.
93. Regional Transportation Fee. 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 by a cashier's check 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 190,086 sq. ft. building per the site plan dated December 18, 2017.

Therefore, the estimated Regional Transportation Fees for the Project is \$458,107.26. The current Regional Transportation Development Mitigation Plan can be found at the following website: <http://cms.sbcounty.gov/dpw/Transportation/TransportationPlanning.aspx>

#### **SPECIAL DISTRICTS – (909) 387-5940**

94. This project lies within the boundaries of County Service Area 70, Zone EV-1. Street lighting plans, plan check fees, and (1) one-year advanced energy charges must be submitted to and approved by Special Districts Department, 157 W. 5<sup>th</sup> St., 2<sup>nd</sup> Floor, San Bernardino, CA 92415-0450.

#### **DEPARTMENT OF PUBLIC WORKS – Traffic Division 909.387.8186**

95. Improvements: The applicant shall design their street improvement plans to include the following:
  2. Driveway. The westerly driveway located on San Bernardino Ave shall be right in/right out only with sufficient delineation and signage to ensure this functional restriction.
  3. Eastbound Left Turns. Appropriate striping shall be provided to ensure eastbound left turn movements at the easterly driveway may be completed outside the through travel lanes. This may be accomplished by a two-way left turn lane, left turn pocket, or a combination thereof. Final design criteria shall be reviewed and approved by the Traffic Division for consistency with adjacent road improvements as well as to safely and adequately convey traffic.
96. Fair Share. The total fair share contribution for this project is required based on the traffic letter dated 05/29/2018 from Urban Crossroads. The fair share breakdown for these improvements is shown below:

INTERSECTION	ESTIMATED COST	FAIR SHARE PERCENTAGE	ESTIMATED CONTRIBUTION
<b>Alabama at San Bernardino</b>	\$ 290,000.00		\$7,651.00
	\$ 25,000.00		\$ 660.00
	\$ 50,000.00		\$1,319.00
<b>Intersection Total</b>	\$ 365,000.00	2.638 %	\$ 9,630.00
<b>Total Fair Share</b>			<b>\$ 9,630.00</b>

The total fair share contribution will be based on the fair share percentages listed above and the estimated construction costs at the time of application for a building permit and shall be paid to the Department of Public Works - Traffic Division. At the present time, the estimated cost is \$9,630.00. This amount will be adjusted to reflect actual construction costs incurred, if available, or will be adjusted to account for future construction costs using the Caltrans Construction Cost Index.

**PUBLIC HEALTH – Environmental Health Services 800.442.2283**

97. Water. Water purveyor shall be City of Redlands or EHS approved.
98. Water Letter. The Applicant shall procure a verification letter from the water agency with jurisdiction. This letter shall state whether or not water connection and service shall be made available to the project by the water agency. The letter shall reference Assessor's Parcel Number (APN): 0253-211-56. For projects with current active water connections, a copy of water bill with the project address may suffice. For information, contact the Water Section at 800.442.2283.
99. Sewer. Method of sewage disposal shall be City of Redlands, or, if not available, EHS approved onsite wastewater treatment system (OWTS).
100. Sewer Letter. The Applicant shall procure a verification letter from the sewer agency with jurisdiction. This letter shall state whether or not sewer connection and service shall be made available to the project by the water agency. The letter shall reference APN: 0253-211-56.
101. If sewer connection and/or service are unavailable, onsite wastewater treatment system(s) may then be allowed under the following conditions: A soil percolation report shall be submitted to DEHS for review and approval. If the percolation report cannot be approved, the project may require and alternative OWTS. For information, please contact the Wastewater Section at 1-800-442-2283.
102. Water/Sewer Agreement The provision of water and sewer service to the project from City of Redlands will require an Out-of-Agency service agreement for service outside its boundaries. Such a contract is required to be reviewed and authorized by LAFCO pursuant to the provisions of Government Code Section 56133. Submit verification of LAFCO authorization of said Out-of-Agency service agreement for water and sewer service to DEHS.
103. Acoustical Information. Submit preliminary acoustical information demonstrating that the proposed project maintains noise levels at or below San Bernardino County Noise Standards, SBCC §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 with noise standards, a project specific acoustical analysis shall be required. Submit information/analysis to the DEHS for review and approval. For information and acoustical checklist, contact DEHS at 800.442.2283.
104. Demolition. All demolition of structures shall have a vector inspection prior to the issuance of any permits pertaining to demolition or destruction of any such premises. For information, contact DEHS Vector Section at 1-800-442-2283. In addition, prior to grading, obtain clearance from Vector Control.

**COUNTY FIRE DEPARTMENT – Community Safety Division (760) 995-8190/ (909) 386-8465/LOCAL FIRE JURISDICTION**

105. Building Plans. No less than three (3) complete sets of Building Plans shall be submitted to the Fire Department for review and approval.
106. 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.
107. 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.
108. 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.
109. Street Sign. This Project is required to have an approved street sign (temporary or permanent). The street sign shall be installed on the nearest street corner to the project. Installation of the temporary sign shall be prior to any combustible material being placed on the construction site. Prior to final inspection and occupancy of the first structure, the permanent street sign shall be installed.

**DEPARTMENT OF PUBLIC WORKS – Solid Waste Management 909.386.8961**

110. Construction and Demolition Waste Management Plan (CDWMP) 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 or volumes of solid waste materials expected to be generated from construction. The CDWMP shall include options to divert from landfill disposal, materials for reuse or recycling by a minimum of 50% of total weight or volume. Forms can be found on our website at <http://cms.sbcounty.gov/dpw/solidwastemanagement.aspx>. An approved CDWMP Part 1 is required before a demolition permit can be issued.

**PRIOR TO FINAL INSPECTION OR OCCUPANCY**

The Following Shall Be Completed

**LAND USE SERVICES DEPARTMENT – Planning Division 909.387.8311**

111. Installation of Improvements. All required on-site improvements shall be installed per approved plans.
112. Shield Lights. Any lights used to illuminate the site shall include appropriate fixture lamp types as listed in SBCC Table 83-7 and be hooded and designed so as to reflect away from adjoining properties and public thoroughfares and in compliance with SBCC Chapter 83.07, "Glare and Outdoor Lighting" (i.e. "Dark Sky Ordinance).
113. CCRF/Occupancy. Prior to occupancy/use, all Condition Compliance Release Forms (CCRF) shall be completed to the satisfaction of County Planning with appropriate authorizing signatures from each affected agency.
114. Screen Rooftop. All roof top mechanical equipment is to be screened from ground vistas.
115. 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.
116. Wheel Stops. All back-in truck trailer parking spaces shall have a wheel stop or other physical barrier twelve feet from any wall, fence or building to prevent damage. All other vehicle spaces shall have wheel stops or curbs installed when adjacent to fences, walls or buildings; these shall be three feet (3') away from such facilities.

117. Signs. Prior to occupancy, the developer shall provide verification that the one freestanding sign is installed. All signs must comply with and be permitted in accordance with SBCC §83.13, Sign Regulations.
118. Disabled Access. Disabled access parking spaces shall be clearly marked as disabled spaces and said markings shall be maintained in good condition at all times.
119. Fees Paid. Prior to final inspection by the Building and Safety Division and/or issuance of a Certificate of Conditional Use by the Planning Division, all fees required under actual cost job number P201500091 shall be paid in full.
120. GHG – Installation/Implementation. The developer shall submit for review and obtain approval from County Planning evidence that all applicable GHG reduction measures have been installed, implemented and that specified performance objectives are being met.

**LAND USE SERVICES DEPARTMENT – Building and Safety Division 909.387.8311**

121. Condition Compliance Release Form Sign-off: Prior to occupancy all Department/Division requirements and sign-off's shall be completed.

**LAND USE SERVICES DEPARTMENT – Land Development Division – Drainage Section 909.387.8311**

122. Drainage Improvements. All required drainage improvements shall be completed by the applicant. The private registered engineer shall inspect improvements outside the County right-of-way and certify that these improvements have been completed according to the approved plans. Certification letter shall be submitted to Land Development.
123. 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**

124. LDD Requirements. All LDD requirements shall be completed by the applicant prior to occupancy.
125. Road Improvements. All required on-site and off-site improvements shall be completed by the applicant, inspected and approved by County Public Works. Completion of road and drainage improvements does not imply acceptance for maintenance by the County.
126. Open Roads/Cash Deposit. Existing County roads, which will require reconstruction, shall remain open for traffic at all times, with adequate detours, during actual construction. A cash deposit shall be made to cover the cost of grading and paving prior to issuance of road encroachment permit. Upon completion of the road and drainage improvement to the satisfaction of the Department of Public Works, the cash deposit may be refunded.
127. 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.
128. Parkway Planting. Trees, irrigation systems, and landscaping required to be installed on public right-of-way shall be approved by County Public Works and Planning. It shall be maintained by the adjacent property owner or other County-approved entity.

**DEPARTMENT OF PUBLIC WORKS – Traffic Division 909.387.8186**

129. The applicant shall construct, at 100% cost to the applicant all roadway improvements as shown on their approved street improvement plans.

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**COUNTY FIRE DEPARTMENT – Community Safety Division (760) 995-8190 / (909) 386-8465/LOCAL FIRE JURISDICTION**

130. 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 three (3) sets of detailed plans to the Fire Department for review and approval. The plans (minimum 1/8" scale) shall include hydraulic calculations and manufacture's specification sheets. 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. Standard 101.1.
131. Fire Alarm. An automatic monitoring fire alarm system complying with the California Fire Code, NFPA and all applicable codes is required for 100 heads or more. The applicant shall hire a Fire Department approved fire alarm contractor. The fire alarm contractor shall submit three (3) sets of detailed plans to the Fire Department for review and approval. The required fees shall be paid at the time of plan submittal.
132. Commercial – Large Facility Addressing. Commercial and industrial developments in excess of 100,000 sq. ft. shall have the street address installed on the building with numbers that are a minimum twelve (12) inches in height and with a one and one half (1 %) 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.
133. Key Box. An approved Fire Department key box is required. The key box shall be provided with a tamper switch and shall be monitored by a Fire Department approved central monitoring service. In commercial, industrial and multi-family complexes, all swing gates shall have an approved fire department Knox Lock.
134. Override Switch. Where an automatic electric security gate is used, an approved Fire Department override switch (Knowlton) is required.
135. Fire Extinguishers. Hand portable fire extinguishers are required. The location, type, and cabinet design shall be approved by the Fire Department.
136. Fire Lanes. The developer 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 and/or private roads in accordance with the approved plan.
137. High-Piled Storage. The applicant shall submit an application for high-piled storage (internal storage over 12' in height), three (3) sets of 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.

**COUNTY FIRE DEPARTMENT - Hazardous Materials Division 909.386.8401**

138. Handlers Permit. Prior to occupancy, the business operator shall be required to apply for one or more of the following permits, or apply for exemption from hazardous materials laws and regulations: a Hazardous Material Permit, a Hazardous Waste Permit, Aboveground Storage Tank Permit or an Underground Storage Tank Permit. Application for one or more of these permits shall occur by submitting a hazardous materials business plan using the California Environmental Reporting System (CERS) <http://cers.calepa.ca.gov>.

**DEPARTMENT OF PUBLIC WORKS – Solid Waste Management 909.386.8961**

139. Construction and Demolition Waste Management Plan (CDWMP) Part 2 – The developer shall complete SWMD's CDWMP Part 2 for construction and demolition. This summary shall provide documentation of actual diversion of materials including but not limited to receipts, invoices or letters from diversion facilities or certification of reuse of materials on site. 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 50% of total weight or volume of all construction waste.

**SPECIAL DISTRICTS – (909) 387-5940**

140. This project lies within the boundaries of County Service Area 70, Zone EV-1. Annexation to Community Facilities District 2010-1 (East Valley) for the purpose of financing ongoing street light costs is required for this project. Annexation fee deposit of \$5,000 is required. Please allow a minimum of three months to complete this process. To complete the annexation to CFD 2010-1 please contact Special Districts Department, Lien Administration Section at (909) 387-5829.

**END OF CONDITIONS**

## **EXHIBIT D**

### Letter of Intent

# Newcastle | PARTNERS

March 7, 2017

County of San Bernardino  
Land Use Services Department  
385 N. Arrowhead Avenue  
San Bernardino, CA 92415

**RE: *Letter of Intent, Redlands Commerce Center***

A conditional use permit is requested for the construction and operation of a 190,086-square-foot (sf) warehouse distribution center inclusive of 10,000 sf of office/administrative uses. The approximately 8.45-net-acre site (Assessor Parcel Number [APN] 0292-151-21) is located approximately 620 feet west of the intersection of San Bernardino Avenue and Alabama Street in unincorporated San Bernardino County. The project site is within the East Valley Specific Plan area which is surrounded by the City of Redlands. The project site is approximately 0.75-mile north of Interstate 10 (I-10), and approximately 0.6-mile west of State Route (SR) 210. The site is generally bound to the north by a commercial warehouse; to the south by a Southern California Edison Company (SCE) transmission line utility easement and San Bernardino Avenue; to the east by a vacant parcel that was formerly a citrus grove; and to the west by a commercial warehouse building. Driveways providing access to the site would traverse the SCE transmission line easement.

The warehouse distribution center is currently planned as a "spec building." Therefore, the future tenant of the building is not currently known. Without knowing the future tenant, an exact number of future employees or hours of operation cannot be determined. As the tenant(s) of the warehouse distribution center have not been identified, the precise nature of the facility operation cannot be determined at this time. With respect to operations, the analysis in the Initial Study prepared for the Redlands Commerce Center assumes that the warehouse distribution center could operate seven days per week, 24 hours per day.

The warehouse distribution center would be approximately 563 feet long (east-to-west) and 314 feet wide (north-to-south). The proposed project would include 20 dock doors with vertical-lift dock-high roll up doors on the north side of the building. Truck maneuvering and staging would be located along the north side of the warehouse distribution center to allow access for the loading and unloading of products from trucks/trailers. The warehouse doors and staging areas would be accessible to trucks through the ingress/egress drive aisles with access to the rear docks past two along both the east and west sides of the building. The facility would be a concrete tilt-up structure.

Vehicular access would be provided at the following two locations. All points of ingress/egress would be un-signalized. Both driveways would traverse a SCE utility easement. The west driveway would be located near the southwest corner of the site and the east driveway would be located near the southeast corner of the site.

- **West Driveway: Right-in/right-out access only.** The intersection of the West Driveway at San Bernardino Avenue would be improved to provide a curb radius of 60 feet (proposed at 25 feet) on the northeast corner to accommodate the turning radius of a 53-foot trailer truck.
- **East Driveway: Full access.** The East Driveway would provide a 60-foot curb radius on the northeast corner (proposed at 25 feet) to accommodate the turning radius of a 53-foot trailer truck.

All passenger vehicle and truck trailer parking would be provided on site. The proposed project would provide 117 parking stalls for employees and visitors, inclusive of handicap parking stalls, which exceeds County parking requirements by 18 stalls. Passenger vehicle parking would be located primarily on the east and west sides of the warehouse distribution center with additional parking on the southeast corner of the project site and limited parking on the north side of the warehouse. The project would provide 50 trailer parking stalls on the north side of the warehouse.

Of the approximately 8.45-acre site, approximately 1.4 acres (or approximately 15.2 percent) of the site would be landscaped with drought-tolerant plant materials. The County of San Bernardino requires a minimum 15 percent landscape coverage. Trees, shrubs, and ground cover would be provided along the eastern, western and southern building frontages and additional landscaping would be provided along the passenger vehicle parking areas on the eastern and western site perimeter. All truck and staging areas would be screened with 8-foot-high wrought iron fencing.

Site lighting would be used to provide adequate lighting for circulation, safety, and security. Outdoor lighting for the parking areas would be provided consistent with the requirements of the County.

The proposed project would connect to existing water mains in San Bernardino Avenue. The project would use a drainage collection system that would collect the storm water runoff in an underground infiltration basin. The infiltration basin has been designed and sized to accept storm water flows generated by improvements on the project site. Water from the site would be conveyed to the existing off-site municipal storm drain. The proposed project would connect to existing City of Redlands Municipal Utilities Department sewer facilities in San Bernardino Avenue.

Construction is assumed to commence in June 2017 with a construction duration of approximately 13 months. Total grading for the project is estimated to require 5,000 cubic yards (cy) of cut and 32,000 cy of fill, with a net difference of 27,000 cy of fill.

Project trip generation analysis concluded that the project is estimated to generate 891 Passenger Car Equivalent (PCE) trips daily, with 575 PCE trips in the AM peak hour and 80 PCE trips in the PM peak hour. Of the total PCE trips, it is estimated that 350 would be generated by 2-, 3- and 4-axle trucks.

Should you have further questions or require additional information, please contact me at 951-582-9800.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Smith". The signature is fluid and cursive, with the first letter of the first name being a large, stylized capital "J".

Partner



## **EXHIBIT E**

### **Initial Study/Mitigated Negative Declaration**

## SAN BERNARDINO COUNTY INITIAL STUDY ENVIRONMENTAL CHECKLIST FORM

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

### PROJECT LABEL:

**APN:** 0292-051-21  
**APPLICANT:** Newcastle Partners  
**COMMUNITY:** Redlands/3<sup>rd</sup> Supervisorial District  
**LOCATION:** North side of W. San Bernardino Avenue  
between Alabama St. and Nevada St.  
**STAFF:** Aron Liang  
**REP(S):** Karina Fidler, Kimley-Horn  
**PROPOSAL:** Conditional Use Permit for the construction  
of a 190,086-square foot building with  
10,000 square feet of office area to be used  
as a warehouse distribution center on 8.45  
net acres.

**USGS Quad:** Redlands  
**T, R, Section:** T1S R3W — SW

**OLUD:** EV/SD (Special Development)  
**Planning Area:** East Valley Area Plan  
**Overlays:** Burrowing Owl Overlay Zone

### PROJECT CONTACT INFORMATION:

**Lead Agency:** San Bernardino County  
Land Use Services Department – Current Planning Division  
385 North Arrowhead Avenue, First Floor  
San Bernardino, CA 92415-0182

**Contact Person:** Aron Liang, Senior Planner  
**Phone No:** (909) 387-0235  
**E-mail:** Aron.Liang@lus.sbcounty.gov

**Fax No:** (909) 387-3249

**Project Sponsor:** Newcastle Partners  
4740 Green River Road  
Suite 118  
Corona, CA 92880

**Consultant:** Kimley-Horn and Associates, Inc.  
401 B Street, Suite 600  
San Diego, CA 92101

### PROJECT DESCRIPTION

The proposed project would allow for the construction and operation of a 190,086-square-foot (sf) warehouse distribution center inclusive of 10,000 sf of office/administrative uses. Table 1 provides a statistical summary for the proposed project. The approximately 8.45-net-acre site (Assessor Parcel Number [APN] 0292-151-21) is located approximately 620 feet west of the intersection of San Bernardino Avenue and Alabama Street in unincorporated San Bernardino County. The project site is within the East Valley Area Plan, which is surrounded by the City of Redlands. The project site is approximately 0.75-mile north of Interstate 10 (I-10), and approximately 0.6-mile west of State Route (SR) 210. The site is generally bound to the north by a commercial warehouse; to the south by a Southern California Edison Company (SCE) transmission line utility easement and San Bernardino Avenue; to the east by a

commercial warehouse that was formerly a citrus grove; and to the west by a commercial warehouse building. Driveways providing access to the site would traverse the SCE transmission line easement.

The warehouse distribution center is currently planned as a "spec building." Therefore, the future tenant of the building is not currently known. Without knowing the future tenant, an exact number of future employees or hours of operation cannot be determined. Therefore, this Initial Study and associated technical reports use approximate potential on-site employees, hours of operation, and vehicular traffic generation based on the project's proposed square footage and use as a warehouse distribution center. In an abundance of caution, this Initial Study and the associated technical reports have assumed uses and intensities which are greater than what might be expected at buildout and operation, resulting in a possible overestimation of impacts.

**Table 1: Project Summary**

Project Element	Quantity
Site area	8.45 ac
Building Area	
Warehouse	180,086 sf
Office	10,000 sf
Total Building Area	190,086 sf
Building Coverage	51.6%
Building Height: Maximum Permitted	50 ft.
Building Height: Proposed	40.5 ft. maximum
Passenger Vehicle Parking: Required (stalls)	
Warehouse: 1 <sup>st</sup> 40,000 sf @ 1:1,000 sf	40 stalls
Warehouse: above 40,000 sf @ 1:4,000 sf	36 stalls
Office: 1:250 sf	40 stalls
Total Required Parking	116 stalls
Passenger Vehicle Parking: Provided (stalls)	
Standard	117 stalls
Trailer Parking: Provided (stalls)	
Trailer	48 stalls
Landscape (sf)	62,434sf (15.2%)
ac: acre; sf: square feet; ft: feet Source: HPA Architecture, 2016.	

As shown on **Figure 3: Site Plan**, the warehouse distribution center would be approximately 563 feet long (east-to-west) and 314 feet wide (north-to-south). The proposed project would include 20 dock doors with vertical-lift dock-high roll up doors on the north side of the building. Truck maneuvering and staging would be located along the north side of the warehouse distribution center to allow access for the loading and unloading of products from trucks/trailers. The warehouse doors and staging areas would be accessible to trucks through the ingress/egress drive aisles with access to the rear docks past two along both the east and west sides of the building. The facility would be a concrete tilt-up structure.

#### **Site Access**

Vehicular access would be provided at two locations; the west driveway would be located near the southwest corner of the site and the east driveway would be located near the southeast corner of the site. All points of ingress/egress would be unsignalized. Both driveways would traverse a SCE utility easement.

- **West Driveway:** Right-in/right-out access only. The intersection of the West Driveway at San Bernardino Avenue would be improved to provide a curb radius of 60 feet (proposed at 25 feet) on the northeast corner to accommodate the turning radius of a 53-foot trailer truck.
- **East Driveway:** Full access. The East Driveway would provide a 60-foot curb radius on the northeast corner (proposed at 25 feet) to accommodate the turning radius of a 53-foot trailer truck.

### **Parking**

All passenger vehicle and truck/trailer parking would be provided on site. The proposed project would provide 117 passenger vehicle parking stalls for employees and visitors, inclusive of handicapped parking stalls, which exceeds County parking requirements by 1 stall. Passenger vehicle parking would be located primarily on the east and west sides of the warehouse distribution center with additional parking on the southeast corner of the project site and limited parking on the north side of the warehouse. The project would provide 50 truck/trailer parking stalls on the north side of the warehouse.

### **Landscaping, Fencing, and Lighting**

Of the approximately 8.45-acre site, approximately 1.4 acres (or 62,434 sf, approximately 15.2 percent) of the site would be landscaped with drought-tolerant plant materials. The County of San Bernardino requires a minimum 15 percent landscape coverage. Trees, shrubs, and ground cover would be provided along the eastern, western and southern building frontages and additional landscaping would be provided along the passenger vehicle parking areas on the eastern and western site perimeter. All truck and staging areas would be screened with 8-foot-high wrought iron fencing.

Site lighting would be used to provide adequate lighting for circulation, safety, and security. Outdoor lighting for the parking areas would be provided consistent with the requirements of the County.

### **Hours of Operations**

The tenant(s) of the warehouse distribution center have not been identified, so the precise nature of the facility operation cannot be determined at this time. With respect to operations, the analysis presented in this Initial Study assumes that warehouse distribution center could operate seven days per week, 24 hours per day.

### **Infrastructure and Off-site Improvements**

The proposed project would connect to existing water mains in San Bernardino Avenue. The project would use a drainage collection system that would collect the storm water runoff in an underground infiltration basin. The infiltration basin has been designed and sized to accept storm water flows generated by improvements on the project site. Any additional flows from the site would be conveyed to the existing off-site municipal storm drain. The proposed project would connect to existing City of Redlands Municipal Utilities Department sewer facilities in San Bernardino Avenue.

### **Construction Schedule**

For purposes of this environmental analysis, construction is assumed to commence in June 2018 with a construction duration of approximately 13 months. Total grading for the project is estimated to require 5,000 cubic yards (cy) of cut and 32,000 cy of fill, with a net difference of 27,000 cy of fill.

### **Project Approvals**

The County of San Bernardino is the Lead Agency under CEQA and is responsible for reviewing and approving this Initial Study/Mitigated Negative Declaration. As part of the proposed project's implementation, the County would also consider the following discretionary approval:

- Conditional Use Permit

In addition to the approval identified above, the project is subject to other ministerial actions by the County as part of project implementation. Subsequent activities would be examined in light of the Initial Study/Mitigated Negative Declaration to determine whether additional CEQA review would be required pursuant to the requirements of Section 21166 of the CEQA Statutes (i.e., *Public Resources Code [PRC]* § 21166) and Sections 15162 and 15168 of the State CEQA Guidelines (i.e., 14 CCR) for subsequent approvals, including but not limited to the following:

- Grading Permits
- Building Permits
- Utility Connections

**ENVIRONMENTAL/EXISTING SITE CONDITIONS:**

The project site is an approximately 8.45-net-acre parcel located approximately 620 feet west of the intersection of San Bernardino Avenue and Alabama Street in unincorporated San Bernardino County. The project site is located approximately 0.75-mile north I-10 and approximately 0.6-mile west of the SR-210. **Figure 1: Regional Location** and **Figure 2: Project Vicinity**, depict the project site in a regional and local context, respectively.

The project site is nearly flat and is located at an elevation of approximately 1,224 feet above mean sea level (msl). The surrounding area exhibits a downward slope to the west. Historically, the site was a citrus grove, as depicted in aerial photography dating from 1938 and site photography through November 15, 2016. Site photos from January 2, 2017, within the *Biotics Resources Report* which is included as Appendix C, show the site to be recently disturbed and the citrus grove no longer present. Topographic maps and aerial photographs dating to 1938 show only agricultural uses on the site. In addition, the SCE utility easement area directly south of the site is composed of disturbed land and ornamental vegetation including a row of Mexican fan palms. Disturbed areas throughout the site are either unvegetated or dominated by non-native, ruderal (weedy) species.

The project site (APN 0292-051-21) is generally bound to the north by a commercial warehouse; to the south by the SCE utility easement and San Bernardino Avenue; to the east by a vacant parcel that was formerly a citrus grove; and to the west by a commercial warehouse building. Land uses adjacent to the site include a vacant lot to the east of the site and vacant lots, a church, school and sports fields to the south of San Bernardino Avenue. The adjacent properties to the north and west contain industrial facilities.

Area	Existing Land Use	Land Use District
Project Site	Recently disturbed former citrus grove	EV/SD (East Valley/Special Development)
North	Commercial warehouse	EV/SD (East Valley/Special Development)
South	Southern California Edison easement; Santa Barbara Avenue; church and school with adjoining sports fields; partially vacant	EV/SD (East Valley/Special Development)
East	Disturbed vacant land	EV/SD (East Valley/Special Development)
West	Commercial warehouse	EV/SD (East Valley/Special Development)

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

**Federal:** N/A

**State:** Regional Water Quality Control Board (RWQCB) - Santa Ana Region

**County of San Bernardino:** Land Use Services – Code Enforcement; Building and Safety; Land Development; Public Health – Environmental Health Services; Environmental Management Division, NPDES Section; Public Works; City of Redlands Fire Department; City of Redlands Police Department.

**Special Districts, Other:** San Bernardino International Airport Authority (Avigation Easement) City of Redlands (water connection); City of Redlands (sanitation, sewer connection); South Coast Air Quality Management District (SCAQMD) (permit to construct).



### Figure 1: Regional Map

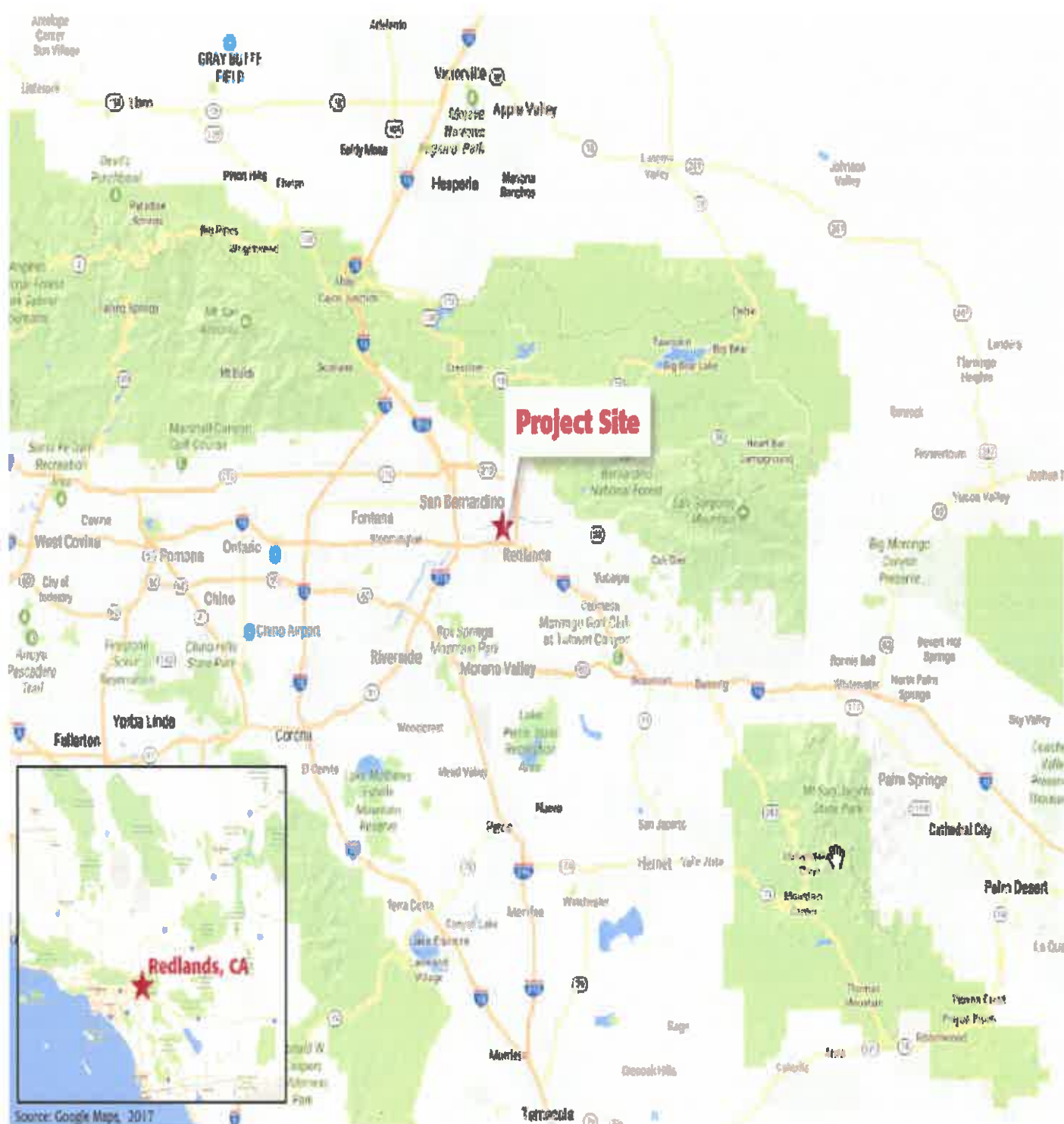
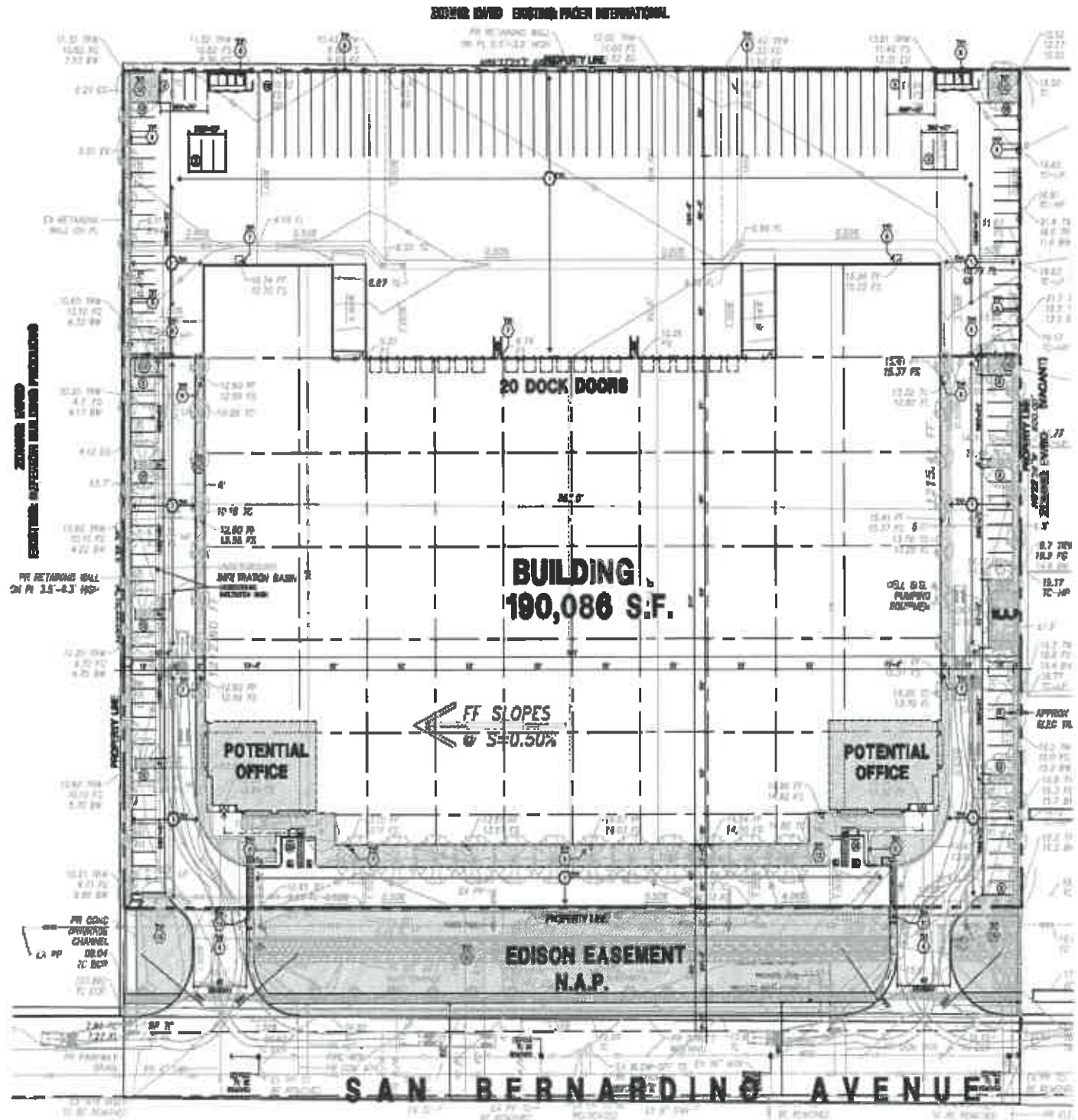


Figure 2: Project Vicinity





Figure 3: Site Plan



## EVALUATION FORMAT

This Initial Study is prepared in compliance with the California Environmental Quality Act (CEQA) pursuant to PRC Section 21000, et seq. and the State CEQA Guidelines (California Code of Regulations Section 15000, et seq.). Specifically, the preparation of an Initial Study is guided by Section 15063 of the State CEQA Guidelines. The project is evaluated based upon its effect on 17 major categories of environmental factors. Each factor in the Initial Study Checklist is reviewed by responding to a series of questions regarding the impact of the project on each element of the overall factor. The effect of the project is categorized into one of the following four categories of possible determinations:

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

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

1. **No Impact:** No impacts are identified or anticipated and no mitigation measures are required.
2. **Less than Significant Impact:** No significant adverse impacts are identified or anticipated and no mitigation measures are required.
3. **Less than Significant Impact with Mitigation Incorporated:** Possible significant adverse impacts have been identified or anticipated and the following mitigation measures are required as a condition of project approval to reduce these impacts to a level below significant.
4. **Potentially Significant Impact:** Significant adverse impacts have been identified or anticipated. An Environmental Impact Report (EIR) is required to evaluate these impacts.

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

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

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

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

**DETERMINATION:**

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

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

Signature (prepared by): Aron Liang, Senior Planner

Signature: Dave Prusch, Supervising Planner

3/24/2018  
Date

3/29/2018  
Date

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

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

- I-a) **No Impact.** The proposed project would not have a substantial adverse effect on a scenic vista. The proposed project would not result in scenic view obstructions because of the predominately developed nature of the surrounding area. According to the County of San Bernardino 2007 General Plan (General Plan), the project site is not located within or adjacent to a County-designated Scenic Corridor. Because there are no scenic vistas in the vicinity of the project site, the proposed project would have no impacts in this regard.
- I-b) **No Impact.** There are no officially-designated County or State scenic highways proximate to the project site. Per the General Plan, a portion of San Bernardino Avenue located within the City of Redlands Sphere of Influence (SOI) is designated a County scenic route. However, this portion of San Bernardino Avenue is approximately 4 miles east of the proposed project. A portion of SR-210, located approximately 0.5 mile east of the project site, is eligible for designation as a State scenic highway<sup>1</sup>. If this portion of SR-210 were to be designated in the future as a State scenic highway, the project would not result in a future adverse impact as it does not traverse SR-210 and it is not directly adjacent to SR-210, therefore it would not damage scenic resources within the highway. Although the project site is proximate to an eligible State scenic highway, it is not officially designated. Thus, the proposed project would not substantially damage any related scenic resources and would not substantially alter any related trees, outcroppings, or historic buildings in a State scenic highway. No impact would occur.
- I-c) **Less Than Significant Impact.** The proposed project would change the character of the project site from a vacant property (former citrus orchard) to a developed site with a warehouse distribution center. Construction of the proposed project may create temporary aesthetic nuisances associated with construction activities. Exposed surfaces, construction debris, equipment, and trucks may be visible. This visual impact associated with the construction of the project would be characteristic development activities found at a typical small construction site. These activities would cease upon project completion and would not result in a substantial degradation to the site or surrounding area. Therefore, short-term visual changes associated with construction activities are considered less than significant.

<sup>1</sup> California Scenic Highway Mapping System, [http://www.dot.ca.gov/hq/LandArch/16\\_livability/scenic\\_highways/scenic\\_hwy.htm](http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/scenic_hwy.htm), accessed February 15, 2017.



The surrounding area is mostly urbanized and contains commercial and institutional land uses. Vacant parcels with land use designations that would permit commercial and industrial development are intermixed with these existing land uses. The proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings because the project would be similar in scale and character to the existing development pattern; the development would be compatible with existing and planned land uses in the area because it would construct a distribution warehouse center in an area with existing and planned industrial and commercial uses. The project would incorporate landscaping and all truck and staging areas would be screened with 8-foot-high wrought iron fencing. Drought-tolerant landscape materials would provide additional screening, as well as enhance the appearance of the site.

- I-d) **Less Than Significant Impact.** The primary source of light associated with the proposed project would be from exterior sources (e.g., parking lot lighting, building accent lighting, security lighting, and landscape accent lighting). Depending upon the location of the light sources and proximity to adjacent light sensitive uses, lighting can be a nuisance, affecting adjacent areas and diminishing the view of the clear night sky. Light spillage is typically defined as unwanted illumination from light fixtures on adjacent properties. Perceived glare is the unwanted and potentially objectionable results from looking directly into a light source of a luminary.

The area surrounding the project site is predominately urbanized. The project would introduce nighttime lighting onto the property. However, there are various sources of nighttime lighting in the area associated with existing warehouse/manufacturing, and institutional uses, as well as street lighting and lighting associated with San Bernardino Avenue. The lighting for the warehouse distribution center would be designed in accordance with the County's Development Code which requires that outdoor lighting for commercial or industrial land uses be fully shielded to preclude light pollution or light trespass on adjacent uses. Perimeter lighting for the proposed project would generally be directed inward towards the site and away from neighboring uses. The project would not use building materials (i.e., reflective glass) or lighting that would cause glare. Therefore, the introduction of new light sources to the project site and glare impacts would be less than significant.

**No significant adverse impacts are identified or anticipated and no mitigation measures are required. The project would be conditioned to comply with all applicable County of San Bernardino regulations and conditions of approval.**

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

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

- II-a) A *Land Evaluation and Site Assessment Analysis for the Redlands Commerce Center Development* was prepared for the proposed project by Kimley-Horn and Associates, Inc. (Kimley-Horn) (February 2017) and is included as Appendix A.

**Less Than Significant Impact.** According to the Department of Conservation California Important Farmland Finder (CIFF), the project site is designated as "Prime Farmland" <sup>2</sup>. Prime Farmland is defined as "land which has the best combination of physical and chemical characteristics for the production of crops. It has the soil quality, growing season, and moisture supply needed to produce sustained high yields of crops when treated and managed, including water management, according

<sup>2</sup> California Department of Conservation, California Important Farmland Finder, <http://maps.conservation.ca.gov/ciff/ciff.html>, accessed February 25, 2017.

to current farming methods. Prime Farmland must have been used for the production of irrigated crops at some time during the two update cycles prior to the mapping date. It does not include publicly owned lands for which there is an adopted policy preventing agricultural use."

Given this Prime Farmland is being converted to a non-agricultural use, a Land Evaluation and Site Assessment (LESA) was performed to determine the project's significance with respect to agricultural resources under the CEQA. LESA is a term used to define an approach for rating the relative quality of land resources based upon specific measurable features. The formulation of a California Agricultural LESA Model is the result of Senate Bill 850 (Chapter 812 /1993), which directed the State of California Resources Agency, in consultation with the Governor's Office of Planning and Research, with developing an amendment to Appendix G of the CEQA Guidelines concerning agricultural lands. Such an amendment is intended "to provide lead agencies with an optional methodology to ensure that significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process" (PRC § 21095).

The California Agricultural LESA Model includes six factors. Two Land Evaluation (LE) factors are based upon measures of soil resource quality. Four Site Assessment (SA) factors are dependent on the project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. Each of these factors is separately rated on a 100-point scale. The factors are then weighted relative to one another and combined, resulting in a single numeric score for a given project, with a maximum attainable score of 100 points. This score becomes the basis for a determination of a project's potential significance. This score is compared to established scoring thresholds. The LESA Manual provides detailed instructions on how to utilize the California LESA Model, and includes worksheets for applying the Model to specific projects.

The LESA prepared for the proposed project identifies a total score of 59.50 out of 100 for the project site. A project is only considered to have a significant impact if each of the LESA subscores (LE and SA) are greater than or equal to a value of 20. The proposed project's subscores are 45.25 (LE) and 14.25 (SA), respectively, meaning that the proposed project is not considered to have a significant impact related to the conversion of agricultural lands. The proposed project would therefore have a less than significant impact to designated farmland.

- II-b) **No Impact.** A Williamson Act contract between local governments and private land owners restricts specified parcels of land to agricultural or related open space use in return for a lower property tax assessment. The project site is zoned EV/SD (East Valley Special District) and is not under a Williamson Act land conservation contract. Development of the proposed project would not conflict with either existing zoning for agricultural uses or with lands under a Williamson Act Contract. Therefore, no impacts would occur.
- II-c) **No Impact.** The project site was a former citrus grove that was recently removed; thus, the entire project site is composed of disturbed habitat. The surrounding area is predominately urbanized. The surrounding area is predominately urbanized. The site is generally bound to the north by a commercial warehouse; to the south by a transmission line easement and San Bernardino Avenue; to the east by a vacant lot that was formerly a citrus grove; and to the west by a commercial warehouse building. There are no forest or timberland areas proximate to the project. The project site is zoned EV/SD (East Valley Special District). The surrounding parcels are also zoned EV/SD or fall within another commercial and industrial district. None of the surrounding County land is zoned to allow agriculture. The project contains one small area of ornamental vegetation in the southern portion. This area contains the non-native Mexican fan palm (*Washingtonia robusta*). These trees are not characterized as a timberland or forestry resource. Project implementation would not result in the rezoning of forest land, timberland, or timberland zoned Timberland Production. No impacts would occur.

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- II-d) **No Impact.** No forest land occurs within or adjacent to the project site. The proposed project site is zoned for industrial uses. No loss or conversion of forest land to non-forest use would occur. Therefore, no impact would occur.
- II-e) **Less Than Significant Impact.** As previously noted, the project site does not contain any forest land or land currently used for agricultural production. However, the project site is designated as "Prime Farmland" (the Department of Conservation CIFF). A LESA was performed in February 2017 to determine the project's significance with respect to conversion of agricultural land to a non-agricultural use. The LESA determined that there would be no significant impact to agricultural lands with implementation of the project.

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

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

**SUBSTANTIATION:**

An *Air Quality Impact Analysis* and a *Mobile Source Diesel Health Risk Assessment* were prepared for the proposed project by Urban Crossroads, Inc., (February 2017) and are included as Appendix B.

- III-a) **Less Than Significant Impact.** The project site is located in the South Coast Air Basin (Air Basin) which includes parts of San Bernardino, Los Angeles, and Riverside counties and all of Orange County. The South Coast Air Quality Management District (SCAQMD) is principally responsible for air pollution control within the Air Basin. On December 7, 2012, the SCAQMD Governing Board approved the *2012 Air Quality Management Plan (2012 AQMP)*, which outlines its strategies for meeting the National Ambient Air Quality Standards (NAAQS) for particular matter less than 2.5 microns in diameter (PM<sub>2.5</sub>) and ozone (O<sub>3</sub>). The *2012 AQMP* was forwarded to the California Air Resources Board (CARB) for inclusion into the California State Implementation Plan. The 1-hour ozone attainment demonstration and vehicle miles traveled emissions offset demonstration was submitted through CARB to the United States Environmental Protection Agency (USEPA).

According to the *2012 AQMP*, two main criteria must be addressed to determine consistency with the AQMP:

**Criterion 1:** Whether a project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

The proposed project would result in emissions that would be below the SCAQMD thresholds during both construction and operational phases. Therefore, the proposed project would not result in an increase in the frequency or severity of existing air quality violations. As such, the proposed project would not have the potential to cause or affect a violation of the ambient air quality standards nor would it delay the timely attainment of air quality standards or 2012 AQMP emissions reductions.

**Criterion 2:** Whether a project will exceed the assumptions in the AQMP based on the year of project buildout and phase.

As discussed in the Land Use section of this Initial Study, the project is consistent with the General Plan and zoning designations for the project site. The population, housing, and employment forecasts, which are adopted by the Southern California Association of Governments' (SCAG's) Regional Council, are incorporated into the 2012 AQMP. Therefore, it can be concluded that the proposed project would be consistent with the projections. The *Air Quality Impact Analysis* concludes that the proposed project would result in less than significant air quality impacts.

The proposed project would not conflict with or obstruct implementation of the 2012 AQMP. The project's long-term influence would also be consistent with the SCAQMD and SCAG's goals and policies, and is therefore considered consistent with the 2012 AQMP. Therefore, the project's potential impact to the air quality plan is less than significant.

- III-b) **Less Than Significant Impact.** Construction and operational emissions were estimated using the California Emissions Estimator Model (CalEEMod) version 2016.3.1 and compared to thresholds set by SCAQMD to evaluate potential significance for each pollutant.

#### Construction Emissions

Construction is expected to last approximately 13 months and was assumed in the *Air Quality Analysis* to commence in June 2018. The proposed project analysis includes construction activities associated with site preparation, grading, building construction, paving, architectural coating, and construction workers commuting. The construction equipment needed for each phase of construction was estimated based on CalEEMod defaults. The duration of construction activity and associated equipment both represent a reasonable approximation of the expected construction activities and durations.

Dust is typically a major concern during rough grading activities. Grading at the site is expected to require approximately 5,000 cy of cut and 32,000 cy of fill, with 27,000 cubic yards (cy) of soil import. The CalEEMod model was utilized to calculate fugitive dust emissions resulting from this phase of construction.

The SCAQMD Rules that are currently applicable during construction activity for this project include but are not limited to: Rule 1113 (Architectural Coatings); Rule 431.2 (Low Sulfur Fuel); Rule 403 (Fugitive Dust); and Rule 1186 / 1186.1 (Street Sweepers). As such credits for Rule 1113 and Rule 403 have been taken.

**Table 2** summarizes the maximum daily peak construction emissions associated with the project without mitigation. The maximum daily emissions for the proposed project would be below the SCAQMD maximum daily threshold significance criteria for each pollutant.

**Table 2: Estimated Maximum Daily Peak Construction Emissions**

Year	Total Construction Emissions (pounds per day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
2017	5.09	52.37	31.89	0.07	10.13	6.58
2018	57.34	33.81	29.68	0.07	3.92	2.118
<b>Maximum Daily Emissions</b>	<b>5.09</b>	<b>52.37</b>	<b>31.89</b>	<b>0.07</b>	<b>10.13</b>	<b>6.58</b>
SCAQMD Significance Criteria	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

VOC: Volatile Organic Compounds; NO<sub>x</sub>: nitrogen oxides; CO: carbon monoxide; SO<sub>x</sub>: sulfur oxides; PM<sub>10</sub>: particulate matter 10 microns or less in diameter; PM<sub>2.5</sub>: particulate matter 2.5 microns or less in diameter.  
Source: Urban Crossroads, 2017.

Construction emissions associated with off-site utility and infrastructure improvements may occur; however, a specific schedule of these improvements is unknown. Air quality impacts associated with these activities are not expected to exceed the emissions identified for project-related construction activities because the work would be done on existing paved areas, limiting dust, and the amount of equipment needed would be less than what is anticipated for on-site project-related construction. As such, the findings of the analysis for project-related construction activities is assumed to also cover off-site utility and infrastructure improvements.

#### Long-Term Operational Emissions

Long-term air quality impacts would be associated with mobile source emissions generated from project traffic and stationary source emissions. The primary operational impacts associated with the project would be from vehicles. Minor impacts would be associated with area sources such as energy use, including combustion of natural gas, which is included in the calculations, and landscaping. Project-generated vehicle emissions have been estimated using CalEEMod. Trip generation rates associated with the proposed project were based on traffic data within the *Traffic Impact Study* (Urban Crossroads, 2017). Table 3 presents a summary of the maximum daily operational emissions estimated for the project. As shown in the table, the emissions of all pollutants would be below the SCAQMD's significant thresholds and impacts would be less than significant.

**Table 3: Summary of Maximum Daily Operational Emissions**

Emission Source	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Operational Emissions (pounds per day) - Summer Scenario</b>						
Area Source	4.17	6.70E-04	0.07	0.00	2.60E-04	2.60E-04
Energy Source	1.00E-02	0.10	0.08	6.00E-04	7.60E-03	7.60E-03
Mobile (Trucks)	1.69	50.70	11.89	0.16	5.41	1.82
Mobile (Passenger Cars)	1.09	1.54	21.51	0.06	6.86	1.84
<b>Total Maximum Daily Emissions</b>	<b>6.96</b>	<b>52.34</b>	<b>33.55</b>	<b>0.16</b>	<b>12.28</b>	<b>1.84</b>
SCAQMD Regional Threshold	55	55	550	150	150	55
Significant?	No	Yes	No	No	No	No
Emission Source	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Operational Emissions (pounds per day) - Winter Scenario</b>						
Area Source	4.17	6.70E-04	0.07	0.00	2.60E-04	2.60E-04
Energy Source	1.00E-02	0.10	0.08	6.00E-04	7.60E-03	7.60E-03
Mobile (Trucks)	1.72	52.11	12.32	0.16	5.41	1.82
Mobile (Passenger Cars)	0.90	1.61	17.38	0.06	6.86	1.84
<b>Total Maximum Daily Emissions</b>	<b>6.80</b>	<b>53.82</b>	<b>29.85</b>	<b>0.22</b>	<b>12.28</b>	<b>3.67</b>
SCAQMD Regional Threshold	55	55	550	150	150	55



Significant?	No	No	No	No	No	No
VOC: Volatile Organic Compounds; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM <sub>10</sub> : particulate matter 10 microns or less in diameter; PM <sub>2.5</sub> : particulate matter 2.5 microns or less in diameter. Source: Urban Crossroads, Inc., 2017.						

- III-c) **Less Than Significant Impact.** Adherence to the SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Pursuant to Federal Clean Air Act mandates, the SCAQMD developed strategies to reduce criteria pollutant emissions as outlined in the 2012 AQMP. As such, the proposed project would comply with applicable SCAQMD Rules and the adopted 2012 AQMP emissions control measures. Per SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements would be imposed on projects throughout the Air Basin. Compliance with SCAQMD rules and regulations would reduce the proposed project's construction-related impacts to a less than significant level. Cumulative construction impacts associated with implementation of the proposed project would be less than significant.

As previously discussed, the proposed project would not result in long-term air quality impacts because emissions would not exceed the SCAQMD-adopted operational thresholds.

The Mobile Source Diesel Health Risk Assessment found that project-source Toxic Air Contaminant (TAC)s would incrementally increase the background cancer risk by a maximum of 0.24 incidents per million population. The applicable SCAQMD significance threshold for Project-level TAC-source cancer risk impacts is 10 incidents per million population. Similarly, SCAQMD significance thresholds state that project contributions to cumulative TAC-source cancer risks would be cumulatively considerable if greater than 10 incidents per million population would occur. The 0.24 incidents per million population increment resulting from the project is therefore not significant, nor cumulatively considerable. Although there will be ambient growth in the project vicinity, any increase in emissions and consequently cancer risk from ambient growth would be offset by the expected decrease in future risk estimates due to the natural turnover of older fleets and equipment being replaced by more efficient, less polluting engines and regulatory actions being phased in.

The proposed project would not contribute to a cumulatively considerable net increase of any nonattainment criteria pollutant. Therefore, cumulative operational impacts associated with implementation of the proposed project would be less than significant.

- III-d) **Less Than Significant Impact.** Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of sensitive receptors are residences, schools, hospitals, and daycare centers. The nearest sensitive receptor is the Packinghouse Christian Fellowship Park, located approximately 67 meters (223 feet) southwest of the project site. In order to identify impacts to sensitive receptors, the SCAQMD recommends addressing localized significance thresholds for construction and operations impacts (area sources only). The CO hotspot analysis following the localized significance thresholds analysis addresses localized mobile source impacts.

#### Localized Significance Thresholds

The *Air Quality Analysis* used the SCAQMD's *Final Localized Significance Threshold Methodology* (SCAQMD 2008) to further evaluate the potential for significant impacts associated with the construction phase of the proposed project. The Localized Significance Threshold (LST) Methodology provides a look-up table for construction, operational emissions based on the emission rate, location, and distance from receptors, and provides a methodology for air dispersion modeling to evaluate whether construction or operation could cause an exceedance of an ambient air quality standard. Because the LST look-up tables are applicable to sources that are five acres or less in size, a screening air dispersion modeling approach was used to assess the significance of localized

construction impacts on receptors in the project vicinity. The LST Methodology only applies to impacts from NO<sub>2</sub>, CO and PM<sub>10</sub> concentrations.

The proposed project could actively disturb approximately 1.5 acres per day during the site preparation and approximately 1.0 acre per day during the grading phases of construction. If the total acreage disturbed is less than or equal to five acres per day, then the SCAQMD's screening look-up tables are used to determine if a project has the potential to result in a significant impact. The look-up tables establish a maximum daily emissions threshold in pounds per day that can be compared to CalEEMod outputs. Table 4 summarizes the construction-source localized significance for the site preparation and grading phases of construction. As shown, localized construction emissions would not exceed the applicable SCAQMD LTSs for any criteria pollutant. Therefore, the project would have a less than significant impact.

**Table 4: Construction-Source Localized Significance Summary**

	Emissions (pounds per day)			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>On-Site Site Preparation Emissions</b>				
Maximum Daily Emissions	52.28	23.46	9.92	6.52
SCAQMD Significance Criteria	195	1,662	24	7
Threshold Exceeded?	No	No	No	No
<b>On-Site Grading Emissions</b>				
Maximum Daily Emissions	33.89	17.10	4.39	2.96
SCAQMD Significance Criteria	169	1,427	20	6
Threshold Exceeded?	No	No	No	No
VOC: Volatile Organic Compounds; NO <sub>x</sub> : nitrogen oxides; CO: carbon monoxide; SO <sub>x</sub> : sulfur oxides; PM <sub>10</sub> : particulate matter 10 microns or less in diameter; PM <sub>2.5</sub> : particulate matter 2.5 microns or less in diameter. Source: Urban Crossroads, 2017.				

Long-term air quality impacts would be associated with on-site stationary sources and mobile source emissions generated from project traffic. The *Air Quality Analysis* assumed five percent (5%) of the project-related mobile sources would be applied to the localized significant analysis. Considering that the weighted trip length used in CalEEMod for the project is approximately 35.23 miles for trucks and passenger cars, 5 percent of this total would represent an on-site travel distance of approximately 1.76 miles for each vehicle. Thus, the 5 percent assumption is conservative and would tend to overstate the actual impact.

Table 5 presents a summary of the operational emissions estimated for the project. As shown in the table, the emissions of all pollutants would be below the SCAQMD's significant thresholds and impacts would be less than significant.

**Table 5: Operations-Source Localized Significance Summary**

Operational Activity	Emissions (pounds per day)			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Maximum Daily Emissions	26.96	15.00	6.14	1.84
SCAQMD Significance Criteria	328	2,990	13	4
Threshold Exceeded?	No	No	No	No

VOC: Volatile Organic Compounds; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM<sub>10</sub>: particulate matter 10 microns or less in diameter; PM<sub>2.5</sub>: particulate matter 2.5 microns or less in diameter.  
Source: Urban Crossroads, 2017.

### Carbon Monoxide Hotspots

Projects that involve increases in traffic have the potential to cause CO "hot spots" due to project-related traffic. A CO "hot spot" is an area of localized carbon monoxide pollution that is caused by severe vehicle congestion on major roadways, typically near intersections. The purpose of the analysis is to verify that a project would not cause or contribute to a violation of the CO standard at intersections for which a significant impact would occur.

The SCAQMD studied the four most congested intersections within the Air Basin in order to support their CO "attainment" demonstration to the USEPA. The modeled intersections experienced more than 100,000 average daily trips, and the SCAQMD found that even these highly congested intersections would not cause a CO hot spot to result.

The *Mobile Source Diesel Health Risk Assessment* evaluated the potential mobile source health risk impacts to sensitive receptors (residents and schools) and adjacent workers associated with the development of the proposed project, more specifically, health risk impacts as a result of exposure to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks accessing the site.

The residential land use with the greatest potential exposure to project DPM source emissions is an existing residential home located approximately 1 mile southeast of the project site. At the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to project DPM source emissions is estimated at 0.01 in one million, which is less than the SCAQMD threshold of 10 in one million. At this same location, non-cancer risks were estimated to be 4.0E-06, which would not exceed the applicable threshold of 1.0. As such, the project will not cause a significant human health or cancer risk to adjacent residences.

The worker receptor land use with the greatest potential exposure to project DPM source emissions is located immediately adjacent to the north of the project site. At the maximally exposed worker (MEIW), the maximum incremental cancer risk impact at this location is 0.24 in one million which is less than the threshold of 10 in one million. At this same location, non-cancer risks were estimated to be 0.001, which would not exceed the applicable threshold of 1.0. As such, the project will not cause a significant human health or cancer risk to adjacent workers.

The school site land use with the greatest potential exposure to project DPM source emissions is located at the Packinghouse Christian Academy, which is located approximately 67 meters (223 feet) southwest of the project site. It should be noted that the Packinghouse Christian Academy is estimated to have the greatest potential exposure to DPM emissions from the proposed project due to truck travel patterns and meteorological conditions. As such, there may be other schools located further from the project site, however, any impacts at other schools would be less than what has been disclosed for the Packinghouse Christian Academy. At the maximally exposed individual school child (MEISC), the maximum incremental cancer risk impact at this location is 0.09 in one million which is less than the threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be 4.6E-04 which would not exceed the applicable threshold of 1.0. Based on the *Traffic Impact Study*, traffic impacts in the study area would be mitigated to levels considered less than significant. Accordingly, the proposed project would not have the potential to cause CO "hot spots," and no significant impact would occur. Further, the proposed project considered herein would not produce the volume of traffic required to generate a CO hot spot. Therefore, the project would not

have the potential to cause CO hot spots and they are not an environmental impact of concern for the proposed project. No significant impact would result.

III-e) **Less Than Significant Impact.** The SCAQMD *CEQA Air Quality Handbook* (SCAQMD 1993) identifies certain land uses as sources of odors. These land uses include the following: agriculture, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed project is a warehousing/distribution center and does not propose to include any odor-inducing uses on the site. Therefore, the project would not be a source of objectionable odors.

**No significant impacts are identified or anticipated. The project would be conditioned to comply with all applicable SCAQMD requirements and County of San Bernardino regulations and conditions of approval.**

#### **Conditions of Approval**

**AQ – Operational Standards.** The developer shall implement the following air quality measures, during operation of the approved land use: All on-site equipment and vehicles (off-road/ on-road), shall comply with the following:

- a) County Diesel Exhaust Control Measures [SBCC § 83.01.040 (c)]
- b) Signs shall be posted requiring all vehicle drivers and equipment operators to turn off engines when not in use.
- c) All engines shall not idle more than five minutes in any one-hour period on the project site. This includes all equipment and vehicles.
- d) On-site electrical power connections shall be provided.
- e) All transportation refrigeration units (TRU's) shall be provided electric connections, when parked on-site.

The loading docks shall be posted with signs providing the telephone numbers of the building facilities manager and the California Air Resources Board to report violations.

**AQ – Dust Control Plan.** The developer shall prepare, submit for review and obtain approval from County Planning of both a Dust Control Plan (DCP) consistent with SCAQMD guidelines and a signed letter agreeing to include in any construction contracts/subcontracts a requirement that project contractors adhere to the requirements of the DCP. The DCP shall include the following requirements:

- a) Exposed soil shall be kept continually moist to reduce fugitive dust during all grading and construction activities, through application of water sprayed a minimum of two times each day.
- b) During high wind conditions (i.e., wind speeds exceeding 25 mph), areas with disturbed soil shall be watered hourly and activities on unpaved surfaces shall cease until wind speeds no longer exceed 25 mph.
- c) Storage piles that are to be left in place for more than three working days shall be sprayed with a non-toxic soil binder, covered with plastic or revegetated.
- d) Storm water control systems shall be installed to prevent off-site mud deposition.
- e) All trucks hauling dirt away from the site shall be covered.
- f) Construction vehicle tires shall be washed, prior to leaving the project site.

- g) Rumble plates shall be installed at construction exits from dirt driveways.
- h) Paved access driveways and streets shall be washed and swept daily when there are visible signs of dirt track-out.

Street sweeping shall be conducted daily when visible soil accumulations occur along site access roadways to remove dirt dropped or tracked-out by construction vehicles. Site access driveways and adjacent streets shall be washed daily, if there are visible signs of any dirt track-out at the conclusion of any workday and after street sweeping.

**AQ – Construction Standards.** The developer shall submit for review and obtain approval from County Planning of a signed letter agreeing to include as a condition of all construction contracts/subcontracts requirements to reduce vehicle and equipment emissions and other impacts to air quality by implementing the following measures and submitting documentation of compliance: The developer/construction contractors shall do the following:

- a) Provide documentation prior to beginning construction demonstrating that the project will comply with all SCAQMD regulations including 402, 403, 431.1, 431.2, 1113 and 1403.
- b) Each contractor shall certify to the developer prior to construction-use that all equipment engines are properly maintained and have been tuned-up within last 6 months.
- c) Each contractor shall minimize the use of diesel-powered vehicles and equipment through the use of electric, gasoline or CNG-powered equipment. All diesel engines shall have aqueous diesel filters and diesel particulate filters.
- d) All gasoline-powered equipment shall have catalytic converters.
- e) Provide onsite electrical power to encourage use of electric tools.
- f) Minimize concurrent use of equipment through equipment phasing.
- g) Provide traffic control during construction to reduce wait times.
- h) Provide on-site food service for construction workers to reduce offsite trips.
- i) Implement the County approved Dust Control Plan (DCP)

Suspend use of all construction equipment operations during second stage smog alerts. NOTE: For daily forecast, call (800) 367-4710 (San Bernardino and Riverside Counties).

**AQ – Coating Restriction Plan.** The developer shall submit for review and obtain approval from County Planning of a Coating Restriction Plan (CRP), consistent with SCAQMD guidelines and a signed letter agreeing to include in any construction contracts/subcontracts a condition that the contractors adhere to the requirements of the CRP. The CRP measures shall be following implemented to the satisfaction of County Building and Safety:

- a) Architectural coatings with Reactive Organic Compounds (ROC) shall not have content greater than 100 g/l.
- b) Architectural coating volume shall not exceed the significance threshold for ROG, which is 75 lbs. /day and the combined daily ROC volume of architectural coatings and asphalt paving shall not exceed the significance threshold for ROC of 75 lbs. per day.
- c) High-Volume, Low Pressure (HVLP) spray guns shall be used to apply coatings.

- d) Precoated/natural colored building materials, water-based or low volatile organic compound (VOC) coatings shall be used, if practical.

Comply with SCAQMD Rule 1113 on the use of architectural coatings.

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

**SUBSTANTIATION:** (Check if project is located in the Biological Resources Overlay or contains habitat for any species listed in the California Natural Diversity Database ☒):  
Category (Burrowing Owl Overlay Zone)

A *Biotic Resources Report* was prepared by Rocks Biological Consulting (January 2017). The Biotic Resources Report is included as Appendix C and the results are summarized herein.

IV-a) **Less Than Significant Impact with Mitigation Incorporated.** The California Department of Fish and Wildlife (CDFW) and the U.S. Fish and Wildlife Service (USFWS) may list species as threatened or endangered under the California Endangered Species Act (CESA) or Federal Endangered



Species Act (FESA), respectively. The USFWS can designate critical habitat that identifies specific areas that are essential to the conservation of a listed species.

As a part of the Biotic Resources report prepared for the project, a query of the CDFW's California Natural Diversity Database (CNDDDB) found historical occurrences of three plant species and five wildlife species within one mile of the project site. The CNDDDB results also show one sensitive habitat within one mile of the project site, Riversidian alluvial fan sage scrub. Riversidian alluvial fan sage scrub was not observed on the project site or within the boundaries of the survey, including the project buffer, an area of approximately 35 feet to 75 feet surrounding the project site and inclusive of the SCE utility easement. The USFWS results did not reveal any additional USFWS threatened/endangered species within one mile of the project site. USFWS-designated critical habitat for San Bernardino kangaroo rat (*Dipodomys merriami parvus*) and Santa Ana sucker (*Catostomus santaanae*) is present within one mile of the project site; however, suitable habitat for these species is not present on the project site or project buffer.

The County's Biotic Resources Overlay Map identifies that the project site is located within the Burrowing Owl Overlay Zone. The burrowing owl is listed as a species of special concern by the CDFW. The Burrowing Owl Assessment conducted as a part of this analysis found that no burrowing owls and no burrowing owl sign was observed on site. A few degraded small fossorial mammal burrows were observed along the south side of the project survey buffer area along San Bernardino Avenue; however, no active fossorial mammal burrows or California ground squirrels (*Otospermophilus beecheyi*) were present on site. The disturbed nature of the soil and previous agricultural activity likely make burrowing by small mammals difficult. The project site has a low potential to support burrowing owl. However, as identified in Mitigation Measure IV-1, a pre-construction burrowing owl survey is required prior to site disturbance to ensure impacts on burrowing owls are reduced to a less than significant level.

The site is currently a vacant parcel that was formerly a citrus grove. The entire site and the southern and eastern project buffers are disturbed habitat with vegetated areas dominated by non-native, ruderal species. Impacts on native vegetation communities or habitats would be less than significant.

The project site has the potential to support avian nests, particularly those of ground-nesting species if ground disturbing activities occur during the nesting season (January 15 to August 31). Impacts on nesting birds are prohibited by the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (CFGF). Implementation of Mitigation Measure IV-2, which addresses pre-construction nesting bird surveys, is required to avoid impacts to nesting birds. Impacts would be mitigated to a less than significant level.

- IV-b) **No Impact.** Based on the Biotic Resources Report, there are no jurisdictional features on the site.
- IV-c) **No Impact.** As noted above, the project does not contain wetlands or jurisdictional features. Therefore, the project would not have a substantial adverse effect on federally protected wetlands.
- IV-d) **Less Than Significant Impact.** The project site is surrounded by urban development including roads and commercial development and is not suitable as a wildlife movement corridor. Therefore, impacts would be less than significant.
- IV-e) **No Impact.** The proposed project would not conflict with any local policies or ordinances protecting biological resources, as the site has been recently disturbed and there are no identified biological resources that are subject to such regulation.

- IV-f) **No Impact.** The project site is not subject to a conservation plan; no plans have been adopted in the area of the project site.

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

**MM# Mitigation Measures**

- IV-1 *Burrowing Owl Pre-Construction Survey:*** *A qualified biologist shall conduct a pre-construction presence/absence survey for burrowing owls within 30 days prior to site disturbance. If burrowing owls are detected on site, then a plan with protective measures for exclusion or avoidance shall be made in coordination with CDFW. If the survey is negative, the project may proceed without further restrictions related to burrowing owls. Mitigation Measure IV-1] Prior to Grading Permits/Planning*
- IV-2 *Nesting Bird Survey:*** *Vegetation clearing and ground disturbing activities should be conducted outside of the nesting season (January 15 to August 31). If avoidance of the nesting season is not feasible, then a qualified biologist shall conduct a nesting bird survey within three days prior to any disturbance of the site, including disking, demolition activities, and grading. If active nests are identified, the biologist shall establish suitable buffers around the nests depending on the level of activity within the buffer and species detected, and the buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. Raptor species shall have an avoidance buffer of 500 feet and other bird species shall have an avoidance buffer of 300 feet. These buffers may be reduced in consultation with the CDFW. [Mitigation Measure IV-2] Prior to Grading Permits/Planning*

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

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

A *Cultural Resource Study Findings Memo* was prepared by ASM Affiliates, Inc. (ASM) (June 2017). The study included a records search at the South Central Coastal Information Center (SCCIC) and a search of the Sacred Lands File (SLF) of the California Native American Heritage Commission (NAHC), and a pedestrian survey on February 1, 2017. The findings are summarized below and the study is included as Appendix D. As discussed in Section XVII, the County of San Bernardino has contacted local tribes. San Manuel Band of Mission Indians have reviewed and approved the Cultural Resource Study Findings Memo for the proposed Project.

**V-a) Less than Significant with Mitigation Incorporated.** The records search conducted as a part of the Cultural Resource Survey provides information about the presence or absence of historic and archaeological resources and previous studies for the project area. The records search conducted by the SCCIC identified 46 previous cultural resource studies that had been conducted within a 1-mile-radius. None of the studies have been conducted directly within the proposed project area. A total of 25 cultural resources have been previously recorded within the 1-mile records search radius; 24 are historic and one was labeled protohistoric.

Of these, one has been previously documented directly adjacent to the southern boundary of the project site within the SCE utility easement. This resource is a series of historic windbreaks made up of Mexican fan palm trees planted before 1927 along many of the streets throughout the area. This resource was recorded by Bruznell (2013) and Tang, CRM Tech (2000) and was found non-significant. The *Cultural Resources Study Findings Memo* concurred with the prior finding of ineligibility for the Mexican fan palms and recommended that they are not eligible either for the California Register of Historic Resources nor any local register (no local register was identified), nor are they identified in a local survey. As such, the *Cultural Resources Study Findings Memo* found the Mexican fan palms to not be a historical resource in accordance with CEQA. Eleven of the previously documented resources are within 0.5 mile of the project site; two of these are within 0.25 mile. All the resources in the area are related to the citrus industry, either former or current orange groves, farm complexes or residences, and associated irrigation or water conveyance systems.

Based on the historic maps and imagery, the project site appears to have been planted with orange trees since at least 1938. At the time of the pedestrian survey on February 1, 2017, the project site was vacant. Aerial imagery from October 2016 identifies the prior on-site citrus grove; oranges were

still present on the surface of the parcel at the time of the survey. The pedestrian survey identified broken pipe fragments that were part of the citrus grove's irrigation system; some large pieces of pipe and concrete were found mostly at the edges of the parcel. In furrows caused by water runoff, broken subsurface pipes were visible. The irrigation system on this parcel as a whole appears to have been destroyed by the recent removal of the citrus grove and only fragmentary and displaced pipe fragments remain. Centrally located along the eastern edge of the parcel is a small fenced area, approximately 7 meters by 10 meters, that contains electrical panels, a smudge pot, a large stand pipe, and various irrigation-related equipment. These items appear to be of various ages, some of which are modern; this area is directly adjacent to the project site, but is a separate utility parcel and is not a part of the project. A portion of site CA-SBR-9991H, a row of palm trees, was recorded along the southern edge of this parcel. The palm trees are still extant; 29 trees were documented. Although the resource is located within the SCE utility easement, the access to the project may require relocation of the trees. Furthermore, this resource warrants special consideration in local planning as a distinctive and well-known landmark which could result in their classification as a historical resource as defined by CEQA §15064.5. As such, further evaluation of this resource is ongoing and the results, upon completion, will be incorporated into this Initial Study.

No information was available to associate the project site with any historical events or persons. There was no indication that the prior on-site citrus grove had any special significance, and it has now been entirely eradicated. Further, the wind break of Mexican fan palm trees were found to be non-significant. As such, no historic resources were identified within the project site that would require any further consideration under CEQA. No further archaeological work is recommended. However, there is a possibility of currently undetectable historic subsurface deposits being present within the project site. Implementation of Mitigation Measures V-1 through V-2 would reduce potential impacts to a less than significant level.

Mitigation Measures V-1 through V-3 are recommended to reduce this potential impact to a level considered less than significant.

- V-b) **Less than Significant with Mitigation Incorporated.** The project site has been previously disturbed and the proposed project area is predominately urbanized with industrial and commercial uses located in the vicinity of the proposed project site. The project site is not located within the County's Cultural Resource Overlay area. No archaeological resources have been recorded on the site, and due to the level of past disturbance, it is not anticipated that archeological sites would be found. Because the project involves development of a prior citrus grove, it is not anticipated that intact subsurface archaeological resources would be encountered during excavation and grading activities. Although the potential for disturbance of undiscovered resources during grading and excavation activities is considered low, Mitigation Measures V-1 through V-3 are required to reduce this potential impact to a level considered less than significant.
- V-c) **Less Than Significant Impact.** No paleontological resources are known to be on or adjacent to the project site. It is assumed that if these resources were located in these areas, they would have been discovered during original or subsequent ground disturbing activities. Should evidence of paleontological resources be encountered during grading and construction, operations would be required to cease, and the County of San Bernardino and County Museum are required to be contacted for determination of appropriate procedures. Compliance with the County's standard conditions would preclude significant impacts to paleontological resources.
- V-d) **Less Than Significant Impact.** The project site is not located within a known or suspected cemetery and there are no known human remains within the site. No known human remains are located within the project site. In the event that unknown human remains are unearthed during construction

activities on the project site, all activities would cease immediately and the County Museum and Native American monitor would be immediately contacted as set forth in the conditions of approval for this project. The Coroner would be contacted pursuant to Section 7050.5 of the *California Health and Safety Code* relative to Native American remains. Should the Coroner determine the human remains to be Native American; the Native American Heritage Commission would be contracted pursuant to PRC Section 5097.98. The likelihood of finding human remains is low and the resulting impact is considered less than significant.

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

**MM# Mitigation Measures**

- V-1 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. [Mitigation Measure V-1] During Grading
- V-2 In the event that Native American cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, San Manuel Band of Mission Indians will be contacted if any such find occurs and be provided information and permitted/invited to perform a site visit when the archaeologist makes his/her assessment, so as to provide Tribal input. [Mitigation Measure V-2] During Grading
- V-3 If significant Native American historical resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, an SOI-qualified archaeologist shall be retained to develop a cultural resources Treatment Plan, as well as a Discovery and Monitoring Plan, the drafts of which shall be provided to San Manuel Band of Mission Indians for review and comment.
- a. All in-field investigations, assessments, and/or data recovery enacted pursuant to the finalized Treatment Plan shall be monitored by a San Manuel Band of Mission Indians Tribal Participant(s).
  - b. The Lead Agency and/or applicant shall, in good faith, consult with San Manuel Band of Mission Indians on the disposition and treatment of any artifacts or other cultural materials encountered during the project.
- [Mitigation Measure V-3] During Grading

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
<b>VI. GEOLOGY AND SOILS – Would the project:</b>					
a)	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i.	Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map Issued by the State Geologist for the area or based on other substantial evidence of a known fault?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii.	Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii.	Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv.	Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b)	Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Be located on expansive soil, as defined in Table 18 1-B of the California Building Code (2001) creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**SUBSTANTIATION:** (Check ☐ if project is located in the Geologic Hazards Overlay District):

A geotechnical investigation, *Geotechnical Engineering Investigation Proposed Kunihiro Industrial Warehouse Development: NWC Alabama Street and San Bernardino Avenue*, was prepared by NorCal Engineering (May 2016). Updates to the Geotechnical Investigation were prepared on July 7, 2017 and July 10, 2017. The Geotechnical Investigation assesses on-site geotechnical conditions and provides preliminary recommendations for design, future grading, and construction. The report is provided in Appendix E and is summarized herein.

- VI-a) i) **Less Than Significant Impact.** The Alquist Priolo Earthquake Fault Zoning Act (Act) was passed in 1972 to address the hazard of surface faulting to structures for human occupancy. The Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace

of active faults. The Act requires the State Geologist to establish regulatory zones, known as "Alquist Priolo Earthquake Fault Zones" around the surface traces of active faults and to issue appropriate maps. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (typically 50 feet). According to the Geotechnical Engineering Investigation, the project site is not located within an Alquist Priolo Earthquake Fault Zone. According to the report, there are no known active or potentially active faults trending towards or through the site and the potential for damage due to direct fault rupture is considered to be low. The possibility of significant fault rupture on the project site is considered to be less than significant and no mitigation is required.

ii) **Less Than Significant Impact.** The site is located in an area of high regional seismicity and the San Jacinto (San Bernardino) fault is located less than two miles from the site. Ground shaking originating from earthquakes along other active faults in the region is expected to induce seismic ground shaking due to smaller anticipated earthquakes and/or greater distances to other faults. The proposed project would be required to be in conformance with the California Building Code (CBC), City regulations, and other applicable standards. Conformance with standard engineering practices and design criteria would reduce the effects of seismic ground shaking to a less than significant level. No mitigation is required.

iii) **Less Than Significant Impact.** Liquefaction generally occurs as a "quicksand" type of ground failure caused by strong ground shaking. The primary factors influencing liquefaction potential include groundwater, soil type, relative density of the sandy soils, confining pressure, and the intensity and duration of ground shaking. The project site is not located within an area of liquefaction susceptibility. These conditions generally consist of medium dense to very dense, well graded, granular soils, and no evidence of a static water table within the upper 30 feet. Based upon information in the San Bernardino County Land Use Plan, the site is not situated in an area of high generalized liquefaction susceptibility. Review of ground water maps of the Upper Santa Ana River Basin show historical groundwater depths to be about 100 feet. Therefore, the potential impact from ground-related failure, including liquefaction, is considered to be less than significant. No mitigation is required.

iv) **No Impact.** The project site is approximately 1,224 feet above msl with a gradual descent of a few feet from north to south. The topography of the surrounding area generally exhibits a downward slope to the west. The site is relatively level and is not located within an area susceptible to landslides. Therefore, there would be no impact from landslides on the proposed project and no mitigation is required.

- VI-b) **Less Than Significant Impact.** Erosion and loss of topsoil is most likely to occur during the construction phase of the proposed project. Project construction activities such as grading and earthwork would expose soils to potential short-term erosion by wind and water. The proposed project would be subject to compliance with the requirements set forth in the National Pollutant Discharge Elimination System (NPDES) Stormwater General Construction Permit for construction activities. The NPDES Permit requires preparation of a Stormwater Pollution Prevention Plan, which would identify specific erosion and sediment control Best Management Practices (BMPs) that would be implemented to protect storm water runoff during construction activities. Compliance with the California Building Code and NPDES permit conditions would minimize effects from erosion and ensure consistency with the Regional Water Quality Control Board Water (RWQCB) Quality Control Plan. Following compliance with NPDES requirements, project implementation would result in less than significant impacts regarding soil erosion.

Substantial soil erosion or loss of topsoil is not expected to occur during long-term operation. The majority of the project site would be covered with structures or paved, and the remaining pervious



areas would be landscaped, which would minimize impacts to a less than significant level and no mitigation is required.

- VI-c) **Less Than Significant Impact.** The project site is not identified as being located on a geologic unit or soil that has been identified as being unstable or having the potential to result on-site or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. As discussed above, the *Geotechnical Investigation* found that impacts due to liquefaction to be less than significant and there would be no impacts from landslides because the site is flat. According to the *Geotechnical Engineering Investigation*, the site consists of fill and natural soil. The report includes recommendations to ensure that soils are appropriate for development. Therefore, the proposed project would not likely result in landslides, lateral spreading, subsidence, liquefaction or collapse and no mitigation is required.
- VI-d) **Less Than Significant Impact.** The proposed project would be required to be in conformance with the California Building Code, City regulations, and other applicable standards. Conformance with standard engineering practices, design criteria, and adherence to the recommendations in the *Geotechnical Investigation* would reduce impacts related to expansive soil potential to a less than significant level.
- VI-e) **Less Than Significant Impact.** The project would be served by the City of Redlands sewer system. The proposed project would not include the implementation of septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur and no mitigation is required.

**No significant impacts are identified or anticipated. The project would be conditioned to comply with all applicable County of San Bernardino regulations and conditions of approval.**

**Conditions of Approval:**

- 1) All vegetation and demolition debris shall be removed and hauled away from the proposed grading areas prior to the start of grading operations.
- 2) All fill soils (1-2 feet thick), unsuitable native soils, and organic material associated with the onsite citrus grove shall be entirely overexcavated to depths approved by the project geotechnical engineer.
- 3) The area of overexcavation shall extend at least 5 feet outside the edges of foundations or equidistant to the depth of fill placed, whichever is greater.
- 4) The overexcavated bottoms shall be scarified to a depth of 12 inches, moisture conditioned and compacted to 90% of the laboratory maximum density (ASTM D1557 test method). All fills shall be free of organic materials and shall be compacted to 90% of the laboratory maximum density (ASTM D1557 test method).
- 5) All foundations and the floor slab areas shall be underlain by a compacted fill blanket of at least 2 feet in thickness.
- 6) Adequate drainage shall be provided away from structures, pavement, and slopes so as to avoid ponding or seepage of water.

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- 7) The project geotechnical consultant shall inspect and approve all areas and depths of overexcavation prior to any fill placement. The project geotechnical consultant shall inspect and approve all foundation excavations prior to placement of any forms, steel, or concrete.
  - 8) The project geotechnical consultant shall review and approve foundation, grading and/or erosion control plans so as to confirm that the recommendations made in the above referenced report are adhered to in the design and construction of the project. The geotechnical consultant shall sign and stamp the foundation, grading and erosion control plans indicating that the plans conform to the geotechnical report recommendations.
  - 9) The above mentioned geotechnical conditions of approval shall be incorporated into the notes on the project foundation and/or grading plans.
  - 10) The foundation plans shall include the following note: "A geotechnical report and response were prepared for this project by NorCal Engineering dated May 31, 2016 and July 25, 2017. The report and response as amended by the conditions of approval are hereby incorporated by reference and are a part of the foundation construction documents. The recommendations outlined in this report and response shall be strictly adhered to during the construction of this project."
  - 11) The grading plans shall include the following note: "A geotechnical report and response were prepared for this project by NorCal Engineering dated May 31, 2016 and July 25, 2017. The report and response as amended by the conditions of approval are hereby incorporated by reference and are a part of the grading construction documents. The recommendations outlined in the report and response shall be strictly adhered to during the construction of this project."

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
<b>VII. GREENHOUSE GAS EMISSIONS – Would the project:</b>					
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing the emissions of greenhouse gases.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### SUBSTANTIATION:

A *Greenhouse Gas Analysis* was prepared for the proposed project by Urban Crossroads, Inc., (February 2017). The report includes the assessment of greenhouse gas (GHG) emissions and evaluation of the project's potential impacts to the environment and is included in Appendix F.

- VII-a) **Less than Significant Impact.** The County of San Bernardino adopted the Greenhouse Gas Emissions Reduction Plan (GHG Plan) in September 2011. The GHG Plan provides guidance on how to analyze GHG emissions and determine significance during the CEQA review of proposed development projects. Further, the GHG Plan establishes a GHG emissions reduction target for the year 2020 that is 15 percent below 2007 emissions.

A screening threshold of 3,000 MT (metric tons) carbon dioxide equivalents (CO<sub>2</sub>e) per year is used to determine if additional analysis is required. Projects that exceed the 3,000 MTCO<sub>2</sub>e per year are required to either achieve a minimum 100 points per the Screening Tables or a 31 percent reduction over 2007 emission levels to have a less than significant individual and cumulative impact for GHG emissions. The point system was devised to ensure project compliance with the reduction measures in the GHG Plan such that the GHG emissions from new development, when considered together with those from existing development, would allow the County to meet its 2020 target and support longer term reductions.

The project would generate approximately 4,279.84 MTCO<sub>2</sub>e per year and would exceed the 3,000 MTCO<sub>2</sub>e threshold. The County's Screening Table point system was used to evaluate the project's compliance with the GHG Plan. The proposed project's design features incorporate 103 points on the Screening Tables for Implementation of GHG Reduction Measures for Commercial Development through the application of Energy Efficient Reduction measures (35 points), Indoor Space Efficiencies (38 points), Building Placement (6 points), Per Capita Water Use Reductions (14 points), and Renewable Fuel/Low Emissions Vehicles (10 points). Because the project design features exceed 100 points, the project is considered consistent with the GHG Plan and is therefore determined to have a less than significant individual and cumulative impact for GHG emissions. The GHG reduction measures proposed by the Applicant through the Screening Tables Review Process have been included in the project design or would be included as Conditions of Approval for the project.

VII-b) **Less than Significant Impact.** Assembly Bill 32 (AB 32) requires California to reduce its GHG emission by approximately 28.5 percent when compared to GHG emissions produced under a Business as Usual scenario. CARB identified reduction measures to achieve this goal as set forth in the CARB Scoping Plan. Projects that are consistent with the CARB Scoping Plan are also considered to be consistent with the goals of AB 32. The project would be consistent with the applicable measures established in the Scoping Plan.

Senate Bill 32 (SB 32) requires California to reduce statewide GHG emission to 40 percent below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The proposed project does not interfere with the State's implementation of GHG reduction plans to meet these goals. The project is consistent with the CARB's Scoping Plan and the County of San Bernardino's GHG Plan.

The proposed project is not anticipated to conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases. Therefore, the project impact would be less than significant.

**No significant adverse impacts are identified and no mitigation measures are required. The project would be conditioned to comply with all applicable County of San Bernardino regulations and conditions of approval.**

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

**SUBSTANTIATION:**

*A Phase I Environmental Assessment Report, 7.99-Acre Lot, W. San Bernardino Avenue near Alabama Street Redlands, California 92374 (Phase I ESA) was prepared by ARCADIS (November*

2016) for the project site. The findings of the Phase I ESA are summarized in the Initial Study; the report is included as Appendix H.

- VIII-a) **Less Than Significant Impact.** Prior uses on the site are not known to have involved hazardous materials. The project is proposed as a warehouse distribution center and is not expected to transport, use, or dispose of significant amounts of hazardous materials. If such uses are proposed on the site in the future, they would be subject to permit and inspection by the Hazardous Materials Division of the County Fire Department; subsequent land use review by the County may be required. Therefore, impacts would be less than significant.
- VIII-b) **Less Than Significant Impact.** As noted in the response to VIII-a), the use or disposal of hazardous materials is not planned as a part of the project. The project site was used for agriculture, including cultivation of citrus orchards from as early as 1939. There were citrus trees present onsite as of November 2016, however, there were largely untended. The Phase I ESA identified three instances where petroleum hydrocarbons may have impacted the site:
- A windmill was previously located near the northern boundary of the Site. An aboveground storage tank associated with the windmill was located on the windmill tower. Arcadis did not observe any stained soils in associated with the tank.
  - During interviews conducted as a part of the Phase I ESA, the site owners stated that smudge pots were not used onsite. Smudge pots are oil-burning devices used to prevent frost on trees. Arcadis conducted further investigation to rule out any historical use. The investigation consisted of overturning the upper 6-12 inches of soil to look for evidence of impacted soils, including staining. One area, approximately three-feet x three-feet, of stained soils were observed. Laboratory analysis found a negligible concentration of petroleum hydrocarbons that does not require further investigation.
  - Stained soils and oily residue were observed in the area surrounding an irrigation well in the eastern portion of the Site. Impacted soils were collected and stored in drums for disposal offsite.

None of the discoveries listed above were identified as Recognized Environmental Concerns (REC), therefore, no further investigation is recommended. The Phase I ESA by Arcadis did not identify any significant impacts from hazardous materials. Additionally, any proposed use or construction activity that might use hazardous materials is subject to permit and inspection by the Hazardous Materials Division of the County Fire Department.

Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by local, State, and federal law.

- VIII-c) **No Impact.** No schools are presently located within 0.25-mile of the project site. The project site is located approximately 0.80-mile southwest of Citrus Valley High School at 800 West Pioneer Avenue in Redlands. Warehouse distribution operations would not be expected to emit or handle hazardous or acutely hazardous materials.
- VIII-d) **No Impact.** The project site is not included in any list of hazardous materials sites compiled pursuant to *Government Code* Section 65962.5<sup>3</sup>. According to the Phase I ESA, there were no RECs (as defined by ASTM Practice E 1527-13) identified in association with the site. No significant adverse

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<sup>3</sup> Department of Toxic Substances Control, <http://www.calepa.ca.gov/SiteCleanup/CorteseList/default.htm>, accessed February 15, 2017.



impacts relative to hazardous materials sites would result with project implementation. No impact would occur.

- VIII-e) **No Impact.** The project site is not located within an airport land use plan; however, the site is within two miles of an airport. The nearest public use airport is the San Bernardino International Airport, approximately 1.4 miles northwest of the project site. The proposed project would be consistent with the surrounding area, which consists of industrial, warehouse, and distribution centers of similar size and stature as the project which suggests the proposed use of the project would not interfere with airport operations and would not create a safety hazard for people residing or working in the project area. The project site is within Airport Safety Review Area 3 (AR3), per County of San Bernardino Hazard Overlay Map. Therefore, the County would review the project for compliance with the requirements and limitations of the overlay zone. Additionally, the project would be reviewed by the San Bernardino International Airport Authority prior to the issuance of permits. No impacts would occur.
- VIII-f) **No Impact.** The project site is not proximate to a private airstrip or related facilities. Therefore, no impacts would occur.
- VIII-g) **No Impact.** The proposed project would have no impacts on emergency response plans or emergency evacuation plans. The County of San Bernardino has adopted an Emergency Management Plan to identify evacuation routes, emergency facilities, and County personnel and equipment available to effectively deal with emergency situations. The Emergency Management Plan also outlines mutual aid agreements between emergency service agencies. No revisions to the adopted Emergency Management Plan would be required as a result of the proposed project. Primary access to all major roads would be maintained during construction of the proposed project. Therefore, impacts would be less than significant.
- VIII-h) **No Impact.** The project area is predominately built out and no wildlands occur within or adjacent to the project site. Project implementation would introduce additional ornamental landscaping, which is not anticipated to create hazardous fire conditions. No impacts would occur.

**No significant adverse impacts are identified and no mitigation measures are required. The project would be conditioned to comply with all applicable County of San Bernardino regulations and conditions of approval.**

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
<b>IX.</b>	<b>HYDROLOGY AND WATER QUALITY – Would the project:</b>				
a)	Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level, which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e)	Create or contribute runoff water, which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f)	Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g)	Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h)	Place within a 100-year flood hazard area structure that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i)	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j)	Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**SUBSTANTIATION:**

- IX-a) **Less Than Significant Impact.** The service purveyor for potable water and sewer is the City of Redlands Municipal Utilities Department. The project is subject to independent regulations by local and State water agencies that ensure compliance with both water quality and waste discharge requirements.

Short-term impacts related to water quality would occur during the earthwork and construction phase, when the potential for erosion, siltation, and sedimentation would be the greatest. The proposed project would disturb approximately 8.5 acres. The proposed project would be required to comply with all Regional Water Quality Control Board (RWQCB) water quality standards and waste discharge requirements. A project-specific Water Quality Management Plan (WQMP) would identify NPDES Construction General Permit requirements and addresses the quality and quantity of storm water runoff generated on site with the incorporation of temporary construction Best Management Practice (BMPs) and permanent treatment BMPs. To obtain coverage under the NPDES Permit, the Applicant is required to submit a Notice of Intent prior to construction activities and prepare a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP lists the BMPs the discharger would use to protect storm water runoff and the placement of those BMPs. Compliance with the requirements outlined in the WQMP would avoid or minimize any violations of water quality standards or waste discharge requirements. Implementation of the proposed project would have a less than significant impact to water quality.

After construction, storm water from the project site would drain into underground infiltration basin located between the proposed warehouse distribution center and the western property line. The majority of runoff would surface flow into a private on-site storm drain via catch basins with storm drain filters prior to entering the underground infiltration system.

- IX-b) **Less Than Significant Impact.** The project would change the majority of the site from pervious to impervious surfaces due to paving and building construction. The project would have one infiltration basin to capture the excess runoff created by the additional on-site impervious surfaces. The water quality volume and increase in stormwater volume caused by impervious surface would be infiltrated. The proposed infiltration with the basin would minimize any potential impacts the project could have on local groundwater recharge. Impacts would be less than significant.

As previously noted, the project site is located within the service area of the City of Redlands Municipal Utilities Department. Redlands supplies a blend of local groundwater, local surface water, and imported water. Groundwater is from the Bunker Hill Subbasin (also known as San Bernardino Basin Area or SBBA) and Yucaipa Subbasin. The Upper Santa Ana Valley Groundwater Basin is an alluvial groundwater basin fed by multiple tributaries, including the Santa Ana River and Mill Creek, both located within the City's service area. The Bunker Hill Subbasin ("Bunker Hill") has a surface area of approximately 89,600 acres and a groundwater storage capacity of 5,976,000 acre-feet. Based on a 10-year average, groundwater from Bunker Hill totals 51.1 percent of the City's annual water production. The Yucaipa Subbasin has a surface area of 25,300 acres and a groundwater storage capacity of 808,000 acre-feet.

The Bunker Hill Subbasin is governed by a court action from 1969 called the Western Judgment, to which the City is stipulated. Provisions of the physical solution set forth in the Judgment Case No. 78426, Western Municipal Water District of Riverside County et al., v. East San Bernardino County Water District et al., entered April 17, 1969, in the Superior Court of the State of California in and for the County of Riverside, established the entitlements and obligations of Valley District and Western Municipal Water District (WMWD) with regard to the Bunker Hill Basin area to be 232,000 acre-feet per year (AFY). The adjusted right for use within Valley District is 167,238 AFY. The adjusted right for

use within the WMWD is 64,862 AFY. Should the extraction, or the withdrawal, of groundwater from the SBBA exceed the safe yield, Valley District is obligated to recharge an amount equal to the amount the safe yield has been exceeded from an outside source of water. The outside source of water is typically State Water Project (SWP) water. This judgment is administered by a Watermaster who prepares an annual report that is submitted to the court.

Due to recent drought conditions and increased utilization of groundwater, Bunker Hill's water table has dropped, resulting in the lowering of the groundwater elevation of one well pump in the City's service area. In order to prevent critical reductions in groundwater levels, the City participates in the Integrated Regional Water Management Plan (IRWMP) for the region to manage groundwater.

The Yucaipa Subbasin has a history of groundwater overdraft, a groundwater management plan is currently underway. The Yucaipa Subbasin is not adjudicated; however, a groundwater management plan (AB 3030 Plan) is underway to establish collective management of the subbasin. Dominant recharge to the sub basin is from percolation of precipitation and infiltration within the channels of overlying streams, particularly Yucaipa and Oak Glen Creeks; underflow from the fractures within the surrounding bedrock beneath the sub basin; and artificial recharge at spreading grounds. Per a recent study, the Yucaipa SubBasin has a sustainable yield of approximately 9,600 AFY and a storage capacity totaling more than 356,000 AF (*2015 San Bernardino Valley Regional Urban Water Management Plan*).

The City of Redlands Municipal Utilities Department supplies a blend of local groundwater, local surface water, and imported water. The provided groundwater is extracted from groundwater production wells from two Bunker Hill and Yucaipa subbasins which have been adjudicated and are managed. The City of Redlands Municipal Utilities Department anticipates that there is sufficient capacity in the existing water system to serve the anticipated growth within its service area without substantially depleting groundwater supplies. Increased water demand at the project site would not contribute to over pumping of groundwater basins, and therefore impacts would be less than significant.

- IX-c) **Less Than Significant Impact.** The proposed project would not substantially alter the existing drainage patterns of the site or vicinity. The existing drainage pattern is from east to west and slightly southerly. Existing on-site surface water runoff flows from the site to the developed property immediately to the west and is discharged ultimately into existing storm drain facilities located in Pioneer Avenue to the north. These flows are then conveyed via the County's Nevada Street Storm Drain into the Santa Ana River north of the project site.

The project proposes to build a 190,000-sf warehouse distribution center with a truck court, access drives, two driveways, associated parking, and a storm drain system including an underground storm water infiltration facility. Proposed drainage patterns on the site would remain similar to existing conditions, except no flows would discharge to the west. Runoff from the project site would instead be conveyed per County of San Bernardino planning department as surface flow into San Bernardino Avenue. The north gutter of San Bernardino Avenue conveys all north right-of-way-adjointing post-developed on-site flows between Alabama and Nevada Streets westerly along San Bernardino Avenue and then southerly in Nevada Street. There are two County of San Bernardino catch basins in Nevada Street which conveys runoff to the Santa Ana River north of the project site.

The project's infiltration system would be located between the proposed building and the western property line and consist of approximately 335 linear feet of 8-foot-diameter perforated corrugated aluminized steel pipe surrounded by a high-void ¾-inch stone which would allow infiltration into native on-site soils. The required and quantified water quality design capture volume of approximately 27,000

cubic feet (0.6 acre-feet) will infiltrate in 16 hours. All site runoff would be pre-treated with storm drain inlet filters prior to entering the underground infiltration system.

All existing facilities are capable of receiving post-development flows from this site up to and including flows associated with a 100-year event frequency. No hydrologic conditions of concern are triggered by or applicable to the proposed development of the project. Therefore, impacts would be less than significant with mitigation incorporated.

- IX-d) **Less Than Significant Impact.** There are no natural drainages (i.e., streams or rivers) on site; existing drainage patterns have been determined by past development on site and in the surrounding area. The proposed project would use a drainage collection system that would collect the storm water runoff into an underground infiltration basins. The drainage basins have been designed and sized to accept storm water flows generated by improvements on the project site. Runoff would be treated and retained underground. By collecting the incremental increase in storm water runoff caused by the increase in impervious surface as well as disconnected pervious surfaces, the project would minimize the amount of off-site flows and allow downstream facilities to accept the remaining discharge.

Flows into the underground basin would be retained and storm water would percolate into the groundwater basin. The existing runoff flow rate would be discharged from the site. Therefore, the drainage design of the project would ensure that no significant on-site and off-site impacts would occur. Therefore, impacts would be less than significant.

- IX-e) **Less Than Significant Impact.** The project would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. All necessary drainage improvements both on-site and off-site would be required as conditions of the construction of the project. There would be adequate capacity in the local and regional drainage systems so that downstream properties are not negatively impacted by any increases or changes in volume, velocity or direction of storm water flows originating from or altered by the project.

- IX-f) **Less Than Significant Impact.** The proposed project would not otherwise substantially degrade water quality because measures for water quality protection, including erosion control measures are required. The *WQMP* would describe the project's compliance with the requirements of the San Bernardino County's NPDES Stormwater Program. Impacts would be less than significant.

- IX-g) **No Impact.** The project would not place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map. No housing is proposed and the project site is not within identified FEMA designated flood hazard areas as shown on the *San Bernardino County Land Use Plan General Plan Hazard Overlays Map* (Map FH29B).

- IX-h) **No Impact.** The project would not place structures within a 100-year flood hazard area. The project site is not within an identified FEMA designated flood hazard area, as shown on the *San Bernardino County Land Use Plan General Plan Hazard Overlays Map* (Map FH29B).

- IX-i) **No Impact.** According to the *San Bernardino County Land Use Plan General Plan Hazard Overlays Map* (Map FH31B), the project site and surrounding area is not within a designated dam inundation area. The project would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam, and no levee or dam are located in the vicinity of the project.

IX-j) **No Impact.** The project site is not located proximate to any enclosed or semi-enclosed bodies of water. Further, the site is not located near the Pacific Ocean, and therefore would not be subject to tsunami impacts. The project site and surrounding area are relatively flat and the site is not positioned downslope from an area of potential mudflow. No impacts would occur.

**No significant adverse impacts are identified and no mitigation measures are required. The project would be conditioned to comply with all applicable City of Redlands regulations and conditions of approval.**



	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
<b>X. LAND USE AND PLANNING – Would the project:</b>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**SUBSTANTIATION:**

- X-a) **No Impact.** The project site is a former citrus grove and the surrounding area is predominately developed with warehouse, industrial, and institutional uses. A vacant lot is directly east and another vacant parcel is southwest of the site along San Bernardino Avenue. The project site has a General Plan land use zoning designation of "East Valley Special Development" (EV/SD). The East Valley Special Development designation allows for residential, commercial, industrial, agricultural, open space, and recreation uses. The site is compatible with its surroundings, which includes industrial uses along San Bernardino Avenue and in the vicinity of the project site. The project would not encroach upon other neighboring uses and would not divide an established community.
- X-b) **No Impact.** The project is consistent with applicable land use policies and regulations of the County Code and General Plan. The proposed project requires a Conditional Use Permit. Per the County of San Bernardino Development Code, Section 85.06.050, projects greater than 80,000 sf in Community Industrial (IC) land use zoning districts must be processed through a Conditional Use Permit. The project complies with all hazard protection, resource preservation and land use modifying Overlay District regulations.
- X-c) **No Impact** The proposed project would not conflict with any habitat conservation plan, as there are no identified biological resources that are subject to such regulation.

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

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

**SUBSTANTIATION:**

XI-a) **No Impact.** No known mineral resources occur in the area and no known mineral recovery activities have occurred on the project site. The proposed project is warehouse distribution center and would not involve mineral recovery. No impacts would occur.

XI-b) **No Impact.** The project site is zoned East Valley Special Development (EVSD) and is not located within a Mineral Resource Overlay (MR) area. No impacts would occur.

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

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
<b>XII.</b>	<b>NOISE – Would the project result in:</b>				
a)	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f)	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### SUBSTANTIATION:

Urban Crossroads, Inc., prepared a *San Bernardino Warehouse Noise Impact Analysis (Noise Assessment)* (February 2017). The *Noise Assessment* can be found in Appendix I and is summarized herein.

An ambient noise level survey was conducted over a 24-hour period on January 25th, 2017, to estimate the existing noise environment near noise-sensitive areas in the area. Four sound measurement locations were selected near park, church, school, and housing uses, and/or project boundaries.

- XII-a) **Less Than Significant.** Section 83.01.080 of the San Bernardino County Development Code (Development Code) governs noise within unincorporated areas of San Bernardino County.

Neither the County of San Bernardino General Plan or County Code establish numeric maximum acceptable construction source noise levels at potentially affected receivers. Therefore, the noise level threshold used in the *Noise Assessment* for construction-related noise is adopted from the *Criteria for Recommended Standard: Occupational Noise Exposure* prepared by the National Institute for Occupational Safety and Health. The construction-related noise level threshold starts at 85 dBA (A-

weighted decibel) for more than eight hours per day, and for every 3 dBA increase, the exposure time is cut in half.

The County of San Bernardino County Code establishes noise level standards for stationary noise sources. For residential properties, the exterior noise level must not exceed dBA Leq (equivalent continuous [average] sound level) during daytime hours and 45 dBA Leq during nighttime hours for both the whole hour, and for not more than 30 minutes in any hour. The residential exterior noise level standards are more conservative noise limits than those identified for Professional Services, Other Commercial, and Industrial uses by the County Code, and, therefore, the Noise Assessment used the residential noise level thresholds described above for analyzing project-related operational noise at nearby sensitive receiver locations. Representative sensitive receivers near the Project site include the following:

- Packinghouse Christian Fellowship park is located approximately 220 feet southwest of the Project site;
- Packinghouse Christian Fellowship church building is located approximately 400 feet south of the Project site;
- Two school buildings of the Packinghouse Christian Fellowship are located approximately 350 feet from the Project site;
- Two additional school buildings of the Packinghouse Christian Fellowship are located approximately 410 feet from the Project site;
- Single-family homes are located approximately 1,500 feet south of the Project site; and
- Multi-family homes are located approximately 2,150 feet south of the Project site.

The closest sensitive receiver is the Packinghouse Christian Fellowship park.

#### Short-Term Noise Impacts

Construction of the proposed project would require the following phases: site preparation, grading, building construction, architectural coatings application, and paving. The site preparation and grading phases are expected to produce the highest construction noise and vibration levels specifically due to work performed using dozers. The unmitigated peak construction noise levels at potentially impacted receiver locations approach 62.9 dBA Leq, which is less than the noise level threshold of 85 dBA Leq used to evaluate potential project-related construction noise level impacts. Project construction would occur only during the hours and days allowed in compliance with County Development Code Section 83.01.080. Therefore, the unmitigated noise impact due to project construction is considered less than significant.

#### Long-Term Noise Impacts

The future tenants of the proposed project are unknown. To present potential worst-case conditions, the Noise Assessment assumes the project would be operational 24 hours per day, 7 days per week. The business operations would primarily be conducted within the enclosed building, except for traffic movement, parking, and loading and unloading of trucks at designated loading bays. On-site project-related noise sources are expected to include idling trucks, delivery truck activities, parking, backup alarms, loading and unloading of goods, and roof-top air conditioning units. The Noise Assessment calculated the operational source noise levels that are expected to be generated at the project site and the project-related noise level increases that would be experienced at each of the sensitive receiver locations. The project's operational noise levels would range from 27.4 to 41.5 dBA Leq. Since the project-related operational noise level contributions would not exceed the significance criteria, the increases at the sensitive receiver locations would be less than significant.

- XII-b) **Less Than Significant Impact.** Vibration is defined as periodic oscillation of a medium or object. Sources of groundborne vibrations include natural phenomena (earthquakes, sea waves, landslides, etc.) or manmade (explosions, machinery, traffic, construction equipment, etc.). The County of San Bernardino Development Code, Section 83.01.090(A) states that vibration shall be no greater than or equal to two-tenths inches per second measured at or beyond the lot line. Therefore, to determine if the vibration levels due to the construction and operation of the project, the peak particle velocity (PPV) vibration level standard of 0.2 inch per second (in/sec) was used.

Short-Term Construction

It is expected that groundborne vibration from project construction activities would cause only intermittent, localized intrusion. The construction vibration analysis showed the highest construction vibration levels in PPV are expected to approach 0.002 in/sec at the nearby receiver locations. This vibration level would be well below the threshold of 0.2 in/sec PPV. Further, the project-related construction vibration levels do not represent levels capable of causing building damage to nearby residential homes. Therefore, the project-related vibration impacts would be less than significant during the construction activities at the project site. Because construction is a temporary activity and would occur during the hours and days allowed by San Bernardino County, vibration generated by construction is exempt from regulation per County Development Code 83.01.090(C)(2).

Long-Term Operations

Vibration associated with project operations would be generated primarily by truck haul trips. Typical vibration levels for the project truck activity at normal traffic speeds would approach 0.001 in/sec PPV, based on the Federal Transit Authority's *Transit Noise Impact and Vibration Assessment*. Therefore, the project-related vibration impacts would be less than significant during the operational activities.

- XII-c) **Less Than Significant Impact.** The increase in noise levels occurs at sensitive receivers that have existing ambient noise levels less than 60 dBA Leq. Per County of San Bernardino Development Code, Section 83.01.080(c), a significant impact would occur if the Project creates a readily perceptible 5 dBA Leq or greater project-related noise level increase. The project does not create a readily perceptible 5 dBA Leq or greater noise level increase. The project would not generate a daytime operational noise level increase over the existing ambient conditions. During the nighttime hours, the highest project-related noise level increase would approach 0.2 dBA L50. On this basis, operational stationary-source noise would not result in a substantial temporary or permanent increase in ambient noise levels in the project vicinity and impacts in these regards would be less than significant.

**Table 6** summarizes the ambient and project-source noise that would be experienced at receiver locations during daytime hours. **Table 7** summarizes the ambient and project-source noise that would be experienced at receiver locations during nighttime hours.

**Table 6: Project Daytime Noise Level Contributions**

Location		Type of Noise	Noise Levels (dBA)						Threshold Exceeded?
Rec.	Meas.		L <sub>eq</sub> (E. Avg.)	L <sub>50</sub> (30 mins)	L <sub>25</sub> (15 mins)	L <sub>5</sub> (5 mins)	L <sub>1</sub> (1 min)	L <sub>max</sub> (Anytime)	
R1	L1	Project Noise Level	40.7	37.9	24.0	27.8	31.5	42.6	No
		Ambient Noise Level	65.5	59.5	64.8	68.8	71.8	93.8	
		Combined	65.5	59.5	64.8	68.8	71.8	93.8	
		Project Contribution	0.0	0.0	0.0	0.0	0.0	0.0	
R2	L2	Project Noise Level	37.2	34.4	22.3	26.4	30.1	39.7	No
		Ambient Noise Level	60.7	56.1	58.8	62.1	66.1	96.0	
		Combined	60.7	56.1	58.8	62.1	66.1	96.0	
		Project Contribution	0.0	0.0	0.0	0.0	0.0	0.0	
R3	L3	Project Noise Level	41.5	38.6	39.3	43.9	47.7	52.3	No
		Ambient Noise Level	65.7	59.1	64.8	68.9	72.3	96.2	
		Combined	65.7	59.1	64.8	68.9	72.3	96.2	
		Project Contribution	0.0	0.0	0.0	0.0	0.0	0.0	
R4	L3	Project Noise Level	41.1	38.2	39.3	43.9	47.7	52.2	No
		Ambient Noise Level	65.7	59.1	64.8	68.9	72.3	96.2	
		Combined	65.7	59.1	64.8	68.9	72.3	96.2	
		Project Contribution	0.0	0.0	0.0	0.0	0.0	0.0	
R5	L4	Project Noise Level	27.4	24.6	14.1	18.4	22.1	30.4	No
		Ambient Noise Level	64.3	60.7	63.7	66.7	69.9	93.9	
		Combined	64.3	60.7	63.7	66.7	69.9	93.9	
		Project Contribution	0.0	0.0	0.0	0.0	0.0	0.0	
R6	L4	Project Noise Level	29.8	26.8	29.8	34.4	38.2	42.6	No
		Ambient Noise Level	64.3	60.7	63.7	66.7	69.9	93.9	
		Combined	64.3	60.7	63.7	66.7	69.9	93.9	
		Project Contribution	0.0	0.0	0.0	0.0	0.0	0.0	

Rec. = Receiver Location; Meas. = Measurement Location  
Source: Urban Crossroads, 2017.



**Table 7: Project Nighttime Noise Level Contributions**

Location		Type of Noise	Noise Levels (dBA)						Threshold Exceeded?
Rec.	Meas.		Leq (E. Avg.)	L <sub>50</sub> (30 mins)	L <sub>25</sub> (15 mins)	L <sub>5</sub> (5 mins)	L <sub>2</sub> (1 min)	L <sub>max</sub> (Anytime)	
R1	L1	Project Noise Level	40.7	37.9	24.0	27.8	31.5	42.6	No
		Ambient Noise Level	61.9	54.6	57.4	63.7	69.8	88.0	
		Combined	61.9	54.7	57.4	63.7	69.8	88.0	
		Project Contribution	0.0	0.1	0.0	0.0	0.0	0.0	
R2	L2	Project Noise Level	37.2	34.4	22.3	26.4	30.1	39.7	No
		Ambient Noise Level	57.4	53.7	56.0	58.9	62.3	81.2	
		Combined	57.4	53.8	56.0	58.9	62.3	81.2	
		Project Contribution	0.0	0.1	0.0	0.0	0.0	0.0	
R3	L3	Project Noise Level	41.5	38.6	39.3	43.9	47.7	52.3	No
		Ambient Noise Level	62.3	51.9	57.9	66.2	71.3	83.0	
		Combined	62.3	52.1	58.0	66.2	71.3	83.0	
		Project Contribution	0.0	0.2	0.1	0.0	0.0	0.0	
R4	L3	Project Noise Level	41.1	38.2	39.3	43.9	47.7	52.2	No
		Ambient Noise Level	62.3	51.9	57.9	66.2	71.3	83.0	
		Combined	62.3	52.1	58.0	66.2	71.3	83.0	
		Project Contribution	0.0	0.2	0.1	0.0	0.0	0.0	
R5	L4	Project Noise Level	27.4	24.6	14.1	18.4	22.1	30.4	No
		Ambient Noise Level	61.5	57.4	59.2	61.9	65.7	93.7	
		Combined	61.5	57.4	59.2	61.9	65.7	93.7	
		Project Contribution	0.0	0.0	0.0	0.0	0.0	0.0	
R6	L4	Project Noise Level	29.8	26.8	29.8	34.4	38.2	42.6	No
		Ambient Noise Level	61.5	57.4	59.2	61.9	65.7	93.7	
		Combined	61.5	57.4	59.2	61.9	65.7	93.7	
		Project Contribution	0.0	0.0	0.0	0.0	0.0	0.0	

Rec. = Receiver Location; Meas. = Measurement Location

Source: Urban Crossroads, 2017.

The Community Noise Equivalent Level (CNEL) is an adjusted average A-weighted sound level for a 24-hour day. It is calculated by adding a 5-dB adjustment to sound levels during evening hours (7:00 PM to 10:00 PM) and a 10-dB adjustment to sound levels during nighttime hours (10:00 PM to 7:00 AM). These adjustments compensate for the increased sensitivity to noise during the typically quieter evening and nighttime hours. The CNEL is used by the State of California and San Bernardino County (County) to evaluate land use compatibility with regard to noise.

To quantify the project's operational traffic noise impacts on the surrounding areas, the changes in traffic noise levels on roadway segments surrounding the project were calculated based on the changes in the average daily traffic volumes. Table 8 summarizes the traffic noise levels without the project and the additional project-related noise level increase. Existing and future noise levels at noise-sensitive land uses already exceed the standard 65 dBA CNEL. Per County of San Bernardino Development Code, Section 83.01.080(d), a significant impact would occur if the Project creates a readily perceptible 1.5 dBA CNEL or greater project-related noise level increase. Project-generated traffic would increase noise levels along these roads by less than 0.5 dBA. As such, project-generated traffic noise increases would be lower than the applicable thresholds of significance. Therefore, the project-related noise impacts would be less than significant.

**Table 8: Summary of Off-Site Project-Related Traffic Noise Levels**

ID	Road Segment	CNEL at Adjacent Land Use						Impact?
		Existing		Opening Year 2018		Horizon Year 2040		
		No Project	Project Addition	No Project	Project Addition	No Project	Project Addition	
1	Alabama St, s/o San Bernardino Av	72.8	0.1	74.8	0.1	75.3	0.1	No
2	San Bernardino Av, w/o Dwy 1	73.2	0.2	75.9	0.2	76.6	0.1	No
3	San Bernardino Av, w/o Packinghouse Dwy	73.2	0.2	76.0	0.1	76.6	0.1	No
4	San Bernardino Av, w/o Dwy 2	72.8	0.2	75.7	0.1	76.3	0.1	No
5	San Bernardino Av, w/o Alabama St	72.8	0.4	75.7	0.2	76.3	0.1	No
6	San Bernardino Av, e/o Alabama St	74.2	0.1	77.4	0.0	77.8	0.1	No
Source: Urban Crossroads, 2017.								

**Less Than Significant Impact.** The peak construction noise levels at receiver locations are provided in Table 9. The site preparation and grading phases of construction are expected to produce the highest construction noise and vibration levels specifically due to work performed using dozers. The unmitigated peak construction noise levels at potentially impacted receiver locations approach 62.9 dBA Leq, which is less than the noise level threshold of 85 dBA Leq used to evaluate potential project-related construction noise level impacts. Therefore, the unmitigated noise impact due to project construction is considered *less than significant*.

**Table 9: Construction Noise Level Compliance**

Receiver Location	Construction Noise Levels (dBA Leq)		
	Peak Activity	Threshold	Threshold Exceeded?
R1	62.9	85	No
R2	60.9	85	No
R3	60.0	85	No
R4	59.2	85	No
R5	44.8	85	No
R6	41.7	85	No

XII-e) **Less Than Significant Impact.** The San Bernardino International Airport is located approximately 1.5 miles northwest of the project site. The County of San Bernardino General Plan Noise Element noise contours for the airport were used to determine potential aircraft-related noise impacts on the project site. The project site is located outside the 65 to 70 dBA CNEL noise contour of the airport. The County of San Bernardino Development Code indicates that the exterior noise level standard for "commercial" land use is 65 dBA CNEL. Because the project would not experience airport-related noise levels greater than the 65 dBA CNEL standard, no airport-related noise sources affect the project site or surrounding properties and no exterior or interiors noise mitigation is required.

XII-f) **No Impact.** The project is not within the vicinity of a private airstrip.

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

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

**SUBSTANTIATION:**

XIII-a) **Less Than Significant Impact.** The warehouse distribution center is currently planned as a "spec building." Therefore, the future tenants(s) of the building is not known and the future tenant, exact number of future employees, or hours of operation cannot be determined. Therefore, this Initial Study and associated technical reports use anticipated on-site employees, hours of operation, and vehicular traffic generation based on the project's proposed square footage and use as a warehouse distribution center. This Initial Study and the associated technical reports have assumed uses and intensities which may be greater than expected at buildout and operation, resulting in a possible overestimation of impacts. Unemployment is currently 5.0 percent in the San Bernardino County; within the City of Redlands, the unemployment rate is 2.9 percent<sup>4</sup>. Given the need for jobs to meet existing population, and the relatively small number of jobs created on a regional basis, this project is not likely to induce substantial population growth. Therefore, implementation of the proposed project would not directly or indirectly induce substantial population growth. Impacts would be less than significant.

XIII-b) **No Impact.** There are no residences on the project site. Therefore, no impacts would occur.

XIII-c) **No Impact.** The proposed project would not displace any land uses or persons from the property. Therefore, no impacts would occur.

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

<sup>4</sup> California Employment Development Department, *Monthly Labor Force Data for Cities and Census Designated Places*, <http://www.labormarketinfo.edd.ca.gov/geography/lmi-by-geography.html>, accessed February 22, 2017.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
<b>XIV. PUBLIC SERVICES</b>				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other Public Facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### SUBSTANTIATION:

##### XIV-a) Less Than Significant Impact.

###### Fire Protection

The City of Redlands Fire Department provides fire protection and emergency services to the project area, through a contractual agreement with the County of San Bernardino. Development of the proposed project would place an additional demand on existing fire services. Consistent with standard County requirements, to offset the increased demand for fire protection services, the proposed project would be conditioned to provide fire safety and fire suppression, including compliance with State and local fire codes, fire sprinklers, fire hydrant system, paved access, and secondary access routes.

###### Police Protection

The City of Redlands Police Department provides police and emergency services to the project area, through a contractual agreement with the County of San Bernardino. The proposed project's demand on police protection services is not expected to be significant because of the nature of the land use and limited number of employees. The project would not create the need to construct a new police station or physically alter an existing station.

###### Schools

The project is located within the Redlands Unified School District. The School District requires the payment of school fees for various land uses including commercial/industrial development. The applicable rate is \$0.56 per square foot of commercial/industrial development. Pursuant to the Leroy F. Greene School Facilities Act of 1998 (Senate Bill 50), the payment of school impact fees constitutes complete mitigation of any project-related impacts to schools services. Therefore, the

payment of school impact fees would reduce the project's impacts to school facilities to a less than significant level.

#### Parks

The proposed project is a warehouse distribution center and does not include a residential component. Therefore, the project would not generate population growth beyond what has been anticipated resulting in an increased demand for or need for the construction of park facilities. Additionally, impacts to existing neighborhood and regional parks or other recreational facilities generated by employees of the project would be minimal. Therefore, impacts would be less than significant.

#### Other Public Facilities

Implementation of the project would not result in a direct increase in the population in the project area and would not substantially increase the demand for public services, including public health services and library services because of the nature of the proposed land use.

**No significant adverse impacts are identified and no mitigation measures are required. The project would be conditioned to comply with all applicable County of San Bernardino regulations and conditions of approval.**



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

**SUBSTANTIATION:**

- XV-a) **Less Than Significant Impact.** As previously addressed, the proposed project does not include a residential component and would not generate population growth beyond what has been anticipated for the County of San Bernardino and would therefore not create an increased demand for recreational facilities. Additionally, impacts to existing neighborhood and regional parks or other recreational facilities generated by employees of the project would be minimal. Therefore, impacts would be less than significant.
- XV-b) **Less Than Significant Impact.** The proposed project does not include, nor does it require the construction of expansion of recreational facilities because the warehouse distribution center uses of the project would not result in a direct increased demand for recreational facilities. Therefore, impacts would be less than significant.

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

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
<b>XVI. TRANSPORTATION/TRAFFIC – Would the project:</b>				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**SUBSTANTIATION:**

The *San Bernardino Avenue Warehouse Traffic Impact Analysis* (Traffic Impact Study) was prepared by Urban Crossroads (August 29, 2017) to evaluate potential traffic impacts. The Traffic Impact Study is summarized below and is included in Appendix J to this Initial Study. The analysis evaluated traffic conditions for the following scenarios:

- Existing Conditions (2017)
- Existing plus Project Conditions
- Opening Year Cumulative (2018) Without Project
- Opening Year Cumulative (2018) With Project
- Horizon Year (2040) Without Project
- Horizon Year (2040) With Project

#### Traffic Study Area

The following traffic study area intersections are evaluated:

1. Driveway 1 at San Bernardino Avenue
2. Packinghouse Driveway at San Bernardino Avenue
3. Driveway 2 at San Bernardino Avenue (Future Intersection)
4. Alabama Street at San Bernardino Avenue

The intersection of Alabama Street at San Bernardino Avenue is signalized. The intersections of San Bernardino Avenue at Driveway 1, Packinghouse Driveway, and Driveway 2 are stop controlled.

The following traffic study area roadway segments are evaluated:

1. San Bernardino Avenue west of Driveway 1
2. San Bernardino Avenue between Driveway 2 and Alabama Street

#### Levels of Service

##### *Intersections*

The San Bernardino County Traffic Impact Study (TIS) Guidelines require that an intersection analysis be performed to identify the level of service (LOS) and delay. For signalized intersections, using the Traffic Impact Study Guidelines, **Table 10** provides the HCM 2010 level of service (LOS) thresholds for signalized intersections. For signalized intersections, LOS is directly related to the average control delay per vehicles and is correlated to a LOS designation.

**Table 10: Level of Service Criteria  
for Signalized Intersections**

LOS	Control Delay per Vehicle (s/veh)
A	≤ 10
B	> 10 and ≤ 20
C	> 20 and ≤ 35
D	> 35 and ≤ 55
E	> 55 and ≤ 80
F	> 80
Source: HCM, 2010.	

For unsignalized intersections, the LOS rating is based on the weighted average control delay expressed in seconds per vehicle. At two-way or side-street stop-controlled intersections, LOS is calculated for each controlled movement, the most critical LOS is the one that describes the effectiveness of that intersection. For all-way stop-controlled intersections, LOS is computed for the intersection as a whole. **Table 11** provides the HCM 2010 levels of service criteria.

**Table 11: Level of Service Criteria  
for Unsignalized Intersections**

LOS	Control Delay per Vehicle (s/veh)
A	$\leq 10$
B	$> 10$ and $\leq 15$
C	$> 15$ and $\leq 25$
D	$> 25$ and $\leq 35$
E	$> 35$ and $\leq 50$
F	$> 50$

Source: HCM, 2010.

### ***Roadway Segments***

Roadway segment operations were evaluated using the applicable average daily traffic (ADT) roadway capacity values provided in the County of San Bernardino General Plan Circulation Element. The LOS rating is based on the volume to capacity ratio. The roadway capacities utilized in the Traffic Impact Study are considered estimates for planning purposes and are affected by such factors as intersections, degree of access control, roadway grades, design geometrics, sight distance, vehicle mix, and pedestrian and bicycle traffic.

### **Thresholds of Significance**

The current significant impact threshold guidelines are based on the County of San Bernardino General Plan Circulation Element. The County of San Bernardino General Plan states that target LOS D be maintained at County intersections and roadway segments wherever possible.

The CMP definition of deficiency is based on maintaining a LOS standard of LOS E or better, except where an existing LOS F condition is identified in the CMP document.

### **Funding Sources**

In addition to any project-specific mitigation requirements that may be imposed on a project, there are Development Impact Fees (DIF) and fair share contribution programs that apply within the proposed project's traffic study area.

The County of San Bernardino has created its own local Development Impact Fee (DIF) program to impose and collect fees from new residential, commercial and industrial development for the purpose of funding roadways and intersections necessary to accommodate County growth as identified in the County's General Plan Circulation Element. The County's DIF includes a Regional Circulation System Fee to comply with Measure "I" and a Local Circulation System Fee to address transportation improvements which are locally significant. The fee schedule was updated in June 2014 and is adjusted annually based upon changes in the construction cost index (CCI).

Improvements constructed by development may be eligible for a fee credit or reimbursement through the program where appropriate (to be determined at the County of San Bernardino's discretion).

When off-site improvements are identified with a minor share of responsibility assigned to proposed development, the approving jurisdiction may elect to collect a fair share contribution or require the development to construct improvements.

### Existing Conditions

Intersection capacity analysis were conducted for the traffic study area intersections to determine the existing intersection LOS based on existing intersection geometrics and the AM and PM peak hour traffic volumes. **Table 12** identifies existing traffic conditions at the traffic study area intersections.

**Table 12: Existing Conditions – Intersection Capacity Analysis**

Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
		Delay <sup>a</sup>	LOS <sup>b</sup>	Delay <sup>a</sup>	LOS <sup>b</sup>
1 Dwy 1 at San Bernardino Ave	CSS	14.1	B	14.1	B
2 Packinghouse Dwy at San Bernardino Ave	CSS	18.4	C	18.7	C
3 Dwy 2 at San Bernardino Ave <sup>c</sup>		n/a	n/a	n/a	n/a
4 Alabama St at San Bernardino Ave	TS	26.0	C	24.1	C

Notes:  
**Bold and values indicate LOS does not meet the applicable jurisdictional requirements**  
CSS = Cross-Street Stop, TS = Traffic Signal  
a. Delay – In seconds. Per the 2010 HCM, overall average intersection delay and LOS are shown for intersections with a traffic signal or AWSC. For intersections with CSSC, the delay and LOS for the worst individual movement is shown.  
b. LOS – HCM 2010 Level of Service  
c. Future Intersection  
Source: Urban Crossroads, 2017.

All the traffic study area intersections are currently operating at acceptable LOS (LOS D or better) for AM and PM peak hours.

Roadway segment analysis were conducted for the traffic study area roadway segments to determine the existing LOS based on existing geometrics and the average daily traffic volumes. **Table 13** identifies existing traffic conditions at the traffic study area roadway segments.

**Table 13: Existing Conditions – Roadway Segment Analysis**

Roadway	Roadway Section	LOS Capacity <sup>a</sup>	ADT <sup>b</sup>	V/C <sup>c</sup>	LOS <sup>d</sup>
1 San Bernardino Ave – west of Dwy 1	2U	18,000	12,177	0.68	B
2 San Bernardino Ave – Dwy 2 to Alabama St	2U	18,000	11,158	0.62	B

Notes:  
**Bold and values indicate LOS does not meet the applicable jurisdictional requirements**  
a. Capacities obtained from the County of San Bernardino's General Plan  
b. ADT – Average Daily Traffic  
c. V/C – Volume to Capacity Ratio  
d. LOS – Level of Service  
Source: Urban Crossroads, 2017.

All the traffic study area roadway segments are currently operating at acceptable LOS (LOS D or better).

### Less Than Significant Impact with Mitigation Incorporated.

#### Opening Year Cumulative (2018) Conditions

#### Opening Year Cumulative (2018) Without Project

(VI-a/b)

The Opening Year 2018 (without and with the project) scenarios assumes a two percent ambient growth factor. Traffic volumes generated by cumulative development projects were also included. As identified in **Table 14**, all study intersections under Opening Year Cumulative (2018) Conditions are

expected to operate at acceptable conditions without the proposed project in both the AM and PM peak hours except for the intersections of Driveway 1 at San Bernardino Avenue and Alabama Street at San Bernardino Avenue.

**Table 14: Opening Year Cumulative (2018) Without Project  
– Intersection Capacity Analysis**

	Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
			Delay <sup>a</sup>	LOS <sup>b</sup>	Delay <sup>a</sup>	LOS <sup>b</sup>
1	Dwy 1 at San Bernardino Ave	CSS	19.2	C	<b>38.2</b>	<b>E</b>
2	Packhouse Dwy at San Bernardino Ave	CSS	29.3	D	32.4	D
3	Dwy 2 at San Bernardino Ave <sup>c</sup>		n/a	n/a	n/a	n/a
4	Alabama St at San Bernardino Ave	TS	<b>64.2</b>	<b>E</b>	<b>90.5</b>	<b>F</b>

Notes:  
**Bold and values indicate LOS does not meet the applicable jurisdictional requirements**  
CSS = Cross-Street Stop, TS = Traffic Signal  
a. Delay – In seconds. Per the 2010 HCM, overall average intersection delay and LOS are shown for intersections with a traffic signal or AWS. For intersections with CSS, the delay and LOS for the worst individual movement is shown.  
b. LOS – HCM 2010 Level of Service  
c. Future Intersection  
Source: Urban Crossroads, 2017.

As identified in **Table 15**, all roadway segments are anticipated to operate at unacceptable conditions without the proposed project for the AM and PM peak hours under Opening Year Cumulative (2018) Conditions.

**Table 15: Opening Year Cumulative (2018) Without Project  
– Roadway Segment Analysis**

	Roadway	Roadway Section	LOS Capacity <sup>a</sup>	ADT <sup>b</sup>	V/C <sup>c</sup>	LOS <sup>d</sup>
1	San Bernardino Ave – west of Dwy 1	2U	18,000	22,765	1.26	<b>F</b>
2	San Bernardino Ave – Dwy 2 to Alabama St	2U	18,000	21,725	1.21	<b>F</b>

Notes:  
**Bold and values indicate LOS does not meet the applicable jurisdictional requirements**  
a. Capacities obtained from the County of San Bernardino's General Plan  
b. ADT – Average Daily Traffic  
c. V/C – Volume to Capacity Ratio  
d. LOS – Level of Service  
Source: Urban Crossroads, 2017.

### **Project Trip Generation**

Daily and peak hour trips were estimated for the proposed project. The trip generation factors for Warehousing were obtained from the 9<sup>th</sup> Edition of the Institute of Transportation Engineers (ITE) trip generation report. The percentage of trucks, by axle type, were obtained from the City of Fontana's Truck Trip Generation Study. The Passenger Car Equivalent (PCE) factors are consistent with the recommended PCE factors in Appendix B of the San Bernardino County CMP 2016 Update. The project trip generation estimates are shown in **Table 16**. The project is estimated to generate 891 PCE trips daily, with 75 PCE trips in the AM peak hour and 80 PCE trips in the PM peak hour.



**Table 16: Project Trip Generation**

Use	Daily	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
<b>Warehouse (191.036 TSF<sup>a</sup>)</b>							
Passenger Cars:	541	36	9	46	12	36	49
Truck Trips:							
2-axle:	35	2	1	3	1	2	3
3-axle:	63	4	1	5	1	4	6
4+-axle:	252	17	4	21	6	17	23
Net Truck Trips (PCE) <sup>b</sup>	350	24	6	29	8	24	31
<b>Total Net Trips (PCE)</b>	<b>891</b>	<b>60</b>	<b>15</b>	<b>75</b>	<b>20</b>	<b>60</b>	<b>80</b>
Notes:							
a. TSF = Thousand Square Feet							
b. Warehouse Vehicle Mix Source: City of Fontana Truck Trip Generation Study for LU 150, August 2003. PCE rates per SANBAG.							
c. Total Net Trips (PCE) = Passenger Cars + Net Truck Trips (PCE)							
Source: Urban Crossroads, 2017.							

### Opening Year Cumulative (2018) With Project

Project trips were added to the Opening Year Cumulative (2018) traffic volumes to develop the Opening Year Cumulative (2018) with project traffic volumes. The capacity of the intersections within the project study area are identified in **Table 17**.

**Table 17: Opening Year Cumulative (2018) with Project – Intersection Capacity Analysis**

Intersection		Traffic Control	AM Peak Hour		PM Peak Hour	
			Delay <sup>a</sup>	LOS <sup>b</sup>	Delay <sup>a</sup>	LOS <sup>b</sup>
1	Dwy 1 at San Bernardino Ave	CSS	16.6	C	34.0	D
2	Packhouse Dwy at San Bernardino Ave	CSS	19.2	C	32.8	D
3	Dwy 2 at San Bernardino Ave <sup>c</sup>	CSS	20.4	C	33.4	D
4	Alabama St at San Bernardino Ave	TS	67.8	E	96.4	F
Notes: <b>Bold and values indicate LOS does not meet the applicable jurisdictional requirements</b> a. Delay – In seconds. Per the 2010 HCM, overall average intersection delay and LOS are shown for intersections with a traffic signal or AWSC. For intersections with CSSC, the delay and LOS for the worst individual movement is shown. b. LOS – HCM 2010 Level of Service c. Future Intersection Source: Urban Crossroads, 2017.						

The intersection analysis results indicate that the addition of Project traffic is not anticipated to result in any additional LOS deficiencies from those previously identified under Opening Year Cumulative (2018) Without Project traffic conditions. The deficiency at Driveway 1 and San Bernardino Avenue is anticipated to improve with the implementation of the Project's site adjacent improvements.

The intersection of Alabama Street and San Bernardino Avenue is forecasted to operate at LOS E in the AM peak hour and LOS F in the PM peak hour with (Table 17) and without (Table 14) the proposed project.

- #4, Alabama Street at San Bernardino Avenue. AM peak hour: LOS E. PM peak hour: LOS F

The addition of project traffic results in additional delay incurring at the intersection. Based on the County's significance criteria, this is considered a significant impact. Mitigation measures are identified in this Initial Study to mitigate the project's contribution to cumulative impacts to a less than significant level.

The results of the roadway segment analysis within the project study area are identified in **Table 18**.

**Table 18: Opening Year Cumulative (2018) with Project  
 – Roadway Segment Analysis**

	Roadway	Roadway Section	LOS Capacity <sup>a</sup>	ADT <sup>b</sup>	V/C <sup>c</sup>	LOS <sup>d</sup>
1	San Bernardino Ave – west of Dwy 1	2U	18,000	23,175	1.29	F
2	San Bernardino Ave – Dwy 2 to Alabama St	2U	18,000	22,207	1.23	F

Notes:  
**Bold and values indicate LOS does not meet the applicable jurisdictional requirements**  
 a. Capacities obtained from the County of San Bernardino's General Plan  
 b. ADT – Average Daily Traffic  
 c. V/C – Volume to Capacity Ratio  
 d. LOS – Level of Service  
 Source: Urban Crossroads, 2017.

San Bernardino Avenue between Driveway 1 and Alabama Street is forecasted to operate at LOS F with (Table 18) and without (Table 15) the proposed project.

- #1, San Bernardino Avenue, west of Driveway 1. LOS F
- #2, San Bernardino Avenue, Driveway 2 to Alabama Street. LOS F

The addition of project traffic is considered a significant impact. Mitigation measures are identified in this Initial Study to mitigate the project's contribution to cumulative impacts to a less than significant level.

#### **Horizon Year (2040) Conditions**

##### **Horizon Year (2040) Without Project**

The Horizon Year (2040) Condition includes traffic projections derived from the San Bernardino Transportation Analysis Model. As identified in **Table 19**, intersections 1 and 4 are anticipated to operate at an unacceptable LOS during one or both of the peak hours under Horizon Year (2040) without the project.

**Table 19: Horizon Year (2040) Without Project – Intersection Capacity Analysis**

Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
		Delay <sup>a</sup>	LOS <sup>b</sup>	Delay <sup>a</sup>	LOS <sup>b</sup>
1 Dwy 1 at San Bernardino Ave <sup>d</sup>	CSS	15.5	C	44.4	E
2 Packinghouse Dwy at San Bernardino Ave <sup>d</sup>	CSS	20.3	C	27.0	D
3 Dwy 2 at San Bernardino Ave <sup>c, d</sup>	CSS	n/a	n/a	n/a	n/a
4 Alabama St at San Bernardino Ave	TS	60.4	E	100.4	F

Notes:  
**Bold and values indicate LOS does not meet the applicable jurisdictional requirements**  
 a. Delay – In seconds. Per the 2010 HCM, overall average intersection delay and LOS are shown for intersections with a traffic signal or AWSC. For intersections with CSSC, the delay and LOS for the worst individual movement is shown.  
 b. LOS – HCM 2010 Level of Service  
 c. Future Intersection

d. Assumes ultimate lanes along San Bernardino Avenue.  
Source: Urban Crossroads, 2017.

As identified in **Table 20**, all roadway segments are anticipated to operate at unacceptable conditions without the proposed project during the AM and PM peak hours.

**Table 20: Horizon Year (2040) Without Project – Roadway Segment Analysis**

	Roadway	Roadway Section	LOS Capacity <sup>a</sup>	ADT <sup>b</sup>	V/C <sup>c</sup>	LOS <sup>d</sup>
1	San Bernardino Ave – west of Dwy 1	2U	18,000	26,746	1.49	F
2	San Bernardino Ave – Dwy 2 to Alabama St	2U	18,000	25,481	1.42	F

Notes:  
**Bold** and values indicate LOS does not meet the applicable jurisdictional requirements  
a. Capacities obtained from the County of San Bernardino's General Plan  
b. ADT – Average Daily Traffic  
c. V/C – Volume to Capacity Ratio  
d. LOS – Level of Service  
Source: Urban Crossroads, 2017.

#### Horizon Year (2040) With Project

To determine potential project impacts, project trips were added to Horizon Year (2040) traffic volumes. As identified in **Table 21**, the intersections listed below are forecasted to operate at LOS E or LOS F with and without the proposed project. The addition of project traffic results in additional delay incurring at the intersections which are considered significant impacts. Mitigation measures are identified in this Initial Study to mitigate the project's contribution to cumulative impacts to a less than significant level.

- #1, Driveway 1 at San Bernardino Avenue. PM peak hour: LOS F
- #4, Alabama Street at San Bernardino Avenue. AM peak hour: LOS E. PM peak hour: LOS F

**Table 21: Horizon Year (2040) with Project – Intersection Capacity Analysis**

	Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
			Delay <sup>a</sup>	LOS <sup>b</sup>	Delay <sup>a</sup>	LOS <sup>b</sup>
1	Dwy 1 at San Bernardino Ave	CSS	17.7	C	58.4	F
2	Packhouse Dwy at San Bernardino Ave	CSS	21.0	C	30.4	D
3	Dwy 2 at San Bernardino Ave <sup>c</sup>	CSS	23.6	C	22.9	C
4	Alabama St at San Bernardino Ave	TS	81.0	E	103.6	F

Notes:  
**Bold** and values indicate LOS does not meet the applicable jurisdictional requirements  
a. Delay – In seconds. Per the 2010 HCM, overall average intersection delay and LOS are shown for intersections with a traffic signal or AWSC. For intersections with CSSC, the delay and LOS for the worst individual movement is shown.  
b. LOS – HCM 2010 Level of Service  
c. Future Intersection  
Source: Urban Crossroads, 2017.

As identified in **Table 22**, San Bernardino Avenue between Driveway 1 and Alabama Street is forecasted to operate at LOS F with and without the proposed project. The addition of project traffic is considered a significant impact. Mitigation measures are identified in this Initial Study to mitigate the project's contribution to cumulative impacts to a less than significant level.

- #1, San Bernardino Avenue, west of Driveway 1. LOS F
- #2, San Bernardino Avenue, Driveway 2 to Alabama Street. LOS F

**Table 22: Horizon Year (2040) with Project – Roadway Segment Analysis**

	Roadway	Roadway Section	LOS Capacity <sup>a</sup>	ADT <sup>b</sup>	V/C <sup>c</sup>	LOS <sup>d</sup>
1	San Bernardino Ave – west of Dwy 1	2U	18,000	26,746	1.49	F
2	San Bernardino Ave – Dwy 2 to Alabama St	2U	18,000	25,481	1.42	F

Notes:  
**Bold and values indicate LOS does not meet the applicable jurisdictional requirements**  
a. Capacities obtained from the County of San Bernardino's General Plan  
b. ADT – Average Daily Traffic  
c. V/C – Volume to Capacity Ratio  
d. LOS – Level of Service  
Source: Urban Crossroads, 2017.

- XVI-c) **No Impact.** San Bernardino International Airport is approximately 1.4 miles northwest of the project site. However, the proposed project would be consistent with the surrounding area because neighboring uses are currently developed as and zoned for commercial and industrial uses. The construction and operation of the project would not require an increase in the frequency of air traffic or alter air traffic patterns. The County would review the project for compliance with the requirements and limitations of the overlay zone. Additionally, the project would be reviewed by the San Bernardino International Airport Authority prior to the issuance of permits. No impacts would occur.
- XVI-d) **Less Than Significant Impact.** The proposed project includes two driveways on San Bernardino Avenue. The locations of the proposed driveways are based on consultation with Southern California Edison (SCE) due to existing power poles and other utility constraints that limit the relocation of the proposed driveways. All driveway and road improvements would be implemented consistent with County design standards. The proposed project would not substantially increase hazards due to a design feature or incompatible use because the project site is adjacent to an established road that is accessed at points with good site distance and properly controlled intersections.
- XVI-e) **Less Than Significant Impact.** Ingress/egress and access through the project site would provide for emergency access in compliance with County requirements. No significant impacts are anticipated.
- XVI-f) **Less Than Significant Impact.**

#### Transit

Omnitrans provides transit services with study area. The study area is served by Bus Route 15, which travels along San Bernardino Avenue east of Alabama Street and along Alabama Street south of San Bernardino Avenue. These transit routes do not currently serve the project area. Improvements, including the installation of a third eastbound, northbound, and southbound through lane and the restriping of the westbound approach, are proposed at the intersection of San Bernardino Avenue and Alabama Street. Construction impacts as a result of these improvements would be temporary in nature and would not result in a significant impact to ongoing transit operations. The project could potentially result in an increased use of the public transportation system. However, this increase would not be substantial and could be accommodated by the existing Omnitrans system. Therefore, the project is not anticipated to impact the effectiveness or performance of existing transit systems. Impacts would be less than significant.

#### Pedestrian and Bicycle Facilities

The project would not significantly impact the effectiveness or performance of existing pedestrian or bicycle facilities.

Possible significant adverse impacts have been identified or anticipated and the following mitigation measures are required as conditions of project approval to reduce these impacts to a level below significant. Additionally, the project would be conditioned to comply with all applicable County of San Bernardino regulations and conditions of approval.

**MM# Mitigation Measures**

**Project Mitigation**

- XVI-1 ***Regional Transportation Fee.*** 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 by a cashier's check 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 190,086 sq. ft. building per the site plan dated June 29, 2017.

Therefore, the estimated Regional Transportation Fees for the Project is \$ 458,107.26 . The current Regional Transportation Development Mitigation Plan can be found at the following website: <http://cms.sbcounty.gov/dpw/Transportation/TransportationPlanning.aspx>

The Applicant shall be responsible for the construction of all site-adjacent roadway improvements:

- XVI-2 ***San Bernardino Avenue:*** Prior to the issuance of an occupancy permit from the County of San Bernardino, San Bernardino, between the Project's western and eastern boundaries shall be constructed to its ultimate half-section width as a Major Arterial Highway (104-foot right-of-way), consistent with the circulation recommendations found in the County of San Bernardino General Plan. The roadway cross-section is proposed to include three travel lanes in each direction and a sidewalk in each direction.

- XVI-3 The Applicant shall be responsible for the construction of all site access point improvements:

***San Bernardino Avenue at Driveway 1:*** Construct project driveway. Restripe the intersection to provide northbound right-in-right-out access only. Construct a second eastbound through lane. Restripe the eastbound right-turn lane as an eastbound shared through-right-turn lane. Construct the second and third westbound through lanes (per San Bernardino Avenue improvement).

***San Bernardino Avenue at Packinghouse Driveway:*** Construct a westbound left-turn lane and the second and third westbound through lanes (per San Bernardino Avenue improvement).

- XVI-4 ***San Bernardino Avenue at Alabama Street:*** Construct a third eastbound through lane and restripe to provide two westbound through lanes and a westbound shared through-right-turn lane. The improvements are to be installed as other area projects develop as determined by the County.

**Cumulative Improvements: 2040 Mitigation Requirements**

- XVI-5 ***San Bernardino Avenue at Packinghouse Driveway:*** Construct a second eastbound through lane and restripe the right-turn lane as an eastbound shared through-right-turn lane. The improvements are to be installed as other area projects develop as determined by the County. The Applicant shall pay a fair share contribution for the intersection improvements.

- XVI-6**     ***San Bernardino Avenue at Alabama Street: Construct a third northbound through lane and a third southbound through lane. Restripe to provide two westbound through lanes and a westbound shared through-right turn lane and a second southbound left turn lane. The improvements are to be installed as other area projects develop as determined by the County.***



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

**SUBSTANTIATION:**

XVII-a) **Less Than Significant Impact.** A Cultural Resource Study Findings Memo was prepared by ASM Affiliates in February 2017 for the proposed project and is provided as Appendix D. The Findings Memo concluded that the project area does not contain any tribal cultural resources as defined in Public Resources Code section 5020.1(k). The site specific pedestrian survey of the proposed project area did not identify any extant historic tribal cultural resources and the proposed project site lacked the potential for inclusion on the California Register of Historical Resources or a local register. As such, potential impacts on historic tribal cultural resources are considered less than significant.

The NAHC search of the SLF determined that Native American cultural resources are not known to be present within the project site. However, the absence of specific site information in the SLF does not indicate the absence of Native American cultural resources within the proposed project site.

In accordance with Assembly Bill 52 (AB 52), which added various provisions to the California Public Resources Code (PRC) that concern Tribal Cultural Resources, including Section 21080.3.1(d), the County has contacted the following tribes requesting to be notified of proposed projects.

- Gabrieleño Band of Mission Indians
- Morongo Band of Mission Indians
- San Manuel Band of Mission Indians
- Soboba Band of Luiseno Indians

The County received one response letter, from the San Manuel Band of Mission Indians dated December 11, 2017. The response letter requested that the proposed Project provide additional assurances regarding the potential for tribal cultural resource discoveries due to Project activities. Mitigation Measures V-1 through V-3 have been included in the Initial Study and would reduce

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potential impacts resulting from a discovery of Tribal cultural resources to a level considered less than significant.

- XVII-b) **Less Than Significant Impact.** The Cultural Resource Study Findings Memo prepared for the proposed project found that the proposed project site does not contain any known historic tribal cultural resources. Impacts are less than significant and no mitigation is required.

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

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
<b>XVIII. UTILITIES AND SERVICE SYSTEMS - Would the project:</b>				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill(s) with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**SUBSTANTIATION:**

XVIII-a) **Less Than Significant Impact.** The proposed project does not exceed wastewater treatment requirements of the Regional Water Quality Control Board, Santa Ana Region, as determined by County Public Health – Environmental Health Services. The project would connect to an existing sewer main in San Bernardino Avenue.

City of Redlands Municipal Utilities Department owns and operates a sewer collection system and the Redlands Wastewater Treatment Facility, which can treat 7.2 million gallons per day (MGD) of wastewater for industrial and irrigation purposes, including supplying water to the Southern California Edison Mountainview Power Plant.

XVIII-b) **Less Than Significant Impact.** The proposed project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities as there is sufficient capacity in the existing system for the proposed use. The project will include installation of an 8" ductile iron pipe non-potable water main across property frontage and connect to existing water mains in San Bernardino Avenue. It is not anticipated that the addition of 8.5-acre commercial site would adversely

impact pipelines or water supply demand or require additional water or wastewater facilities within the City of Redlands Municipal Utilities Department.

- XVIII-c) **Less Than Significant Impact.** The proposed project would not require or result in the construction of new storm water drainage facilities or expansion of existing facilities that cause significant environmental effects. The proposed project would use a drainage collection system that would collect the storm water runoff in an underground infiltration basin. The infiltration basin has been designed and sized to accept storm water flows generated by improvements on the project site.

Flows into the infiltration basin would be retained and storm water would percolate into the groundwater basin. Any additional flows from the site would be conveyed to the existing off-site municipal storm drain. Therefore, the drainage design of the project would ensure that on-site and off-site impacts are reduced. All necessary drainage improvements on-site and off-site are required as conditions of construction of the project. Therefore, impacts would be less than significant.

- XVIII-d) **Less Than Significant Impact.** The proposed project would have sufficient water supplies available to serve the project from existing entitlements and resources. City of Redlands Municipal Utilities Department has identified that it has adequate water service capacity to serve the projected demand for the project, in addition to the Water District's existing commitments. The Water District has issued a will serve letter for the provision of potable water.

- XVIII-e) **Less Than Significant Impact.** As previously addressed, the proposed project would connect to the City of Redlands Municipal Utilities Department for sewer.

- XVIII-f) **Less Than Significant Impact.** The proposed project is served by the Mid-Valley Landfill which has sufficient permitted capacity to accommodate the project's solid waste disposal needs.

- XVIII-g) **Less Than Significant Impact.** The proposed project is required to comply with federal, State, and local statutes and regulations related to solid waste. The project would consist of short-term construction activities (with short-term waste generation limited to minor quantities of construction debris) and therefore would not result in long-term solid waste generation. Solid waste produced during the construction phase of this project or during future operational activity would be disposed of in accordance with all applicable statutes and regulations. Accordingly, no significant impacts related to landfill capacity are anticipated from the proposed project.

**No significant adverse impacts are identified or anticipated and no mitigation measures are required. The project would be conditioned to comply with all applicable City of Redlands regulations and conditions of approval.**

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
<b>XIX. MANDATORY FINDINGS OF SIGNIFICANCE:</b>				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects, which will cause Substantial adverse effects on human beings, either directly Or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**SUBSTANTIATION:**

- XIX-a) Less Than Significant Impact.** The project does not have the potential to significantly degrade the overall quality of the region's environment, or substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population or drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. There are no rare or endangered species or other species of plants or animals or habitat identified by the Biological Resources Report (Rocks Biological Consulting, 2017) as being significantly and negatively impacted by this project. There are no known historic or prehistoric resources on this site. If any archaeological or paleontological resources are identified during construction the project, the project is conditioned to stop and identify appropriate authorities, who properly record and/or remove for classification any such finds.
- XIX-b) Less Than Significant Impact.** The project does not have impacts that are individually limited, but cumulatively considerable. The sites of projects in the area to which this project would add cumulative impacts have either existing or planned infrastructure that is sufficient for all planned uses. These sites either are occupied or are capable of absorbing such uses without generating any cumulatively significant impacts.
- XIX-c) Less Than Significant Impact.** The project would not have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly, as there are no such impacts identified by the studies conducted for this project or identified by review of other sources or by other agencies. Only minor increases in traffic, emissions and noise would be created by implementation of the proposed project. These potential impacts have been evaluated and have

been deemed to be neither individually significant nor cumulatively considerable in terms of any adverse impact upon the region, the local community or its inhabitants. At a minimum, the project would be required to meet the conditions of approval for the project to be implemented. It is anticipated that all such conditions of approval would further insure that no potential for adverse impacts would be introduced by construction activities, initial or future land uses authorized by the project approval.



## XX. MITIGATION MEASURES

(Any mitigation measures, which are not self-monitoring shall have a Mitigation Monitoring and Reporting Program prepared and adopted at time of project approval)

### **SELF MONITORING MITIGATION MEASURES:** (Condition compliance will be verified by existing procedure)

#### **Mitigation Measures**

- IV-1 *Burrowing Owl Pre-Construction Survey:*** *A qualified biologist shall conduct a pre-construction presence/absence survey for burrowing owls within 30 days prior to site disturbance. If burrowing owls are detected on site, then a plan for exclusion or avoidance shall be made in coordination with CDFW. If the survey is negative, the project may proceed without further restrictions related to burrowing owls. [Mitigation Measure IV-1] Prior to Grading Permits/Planning*
- IV-2 *Nesting Bird Survey:*** *Vegetation clearing and ground disturbing activities should be conducted outside of the nesting season (January 15 to August 31). If avoidance of the nesting season is not feasible, then a qualified biologist shall conduct a nesting bird survey within three days prior to any disturbance of the site, including diking, demolition activities, and grading. If active nests are identified, the biologist shall establish suitable buffers around the nests depending on the level of activity within the buffer and species detected, and the buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. Raptor species shall have an avoidance buffer of 500 feet and other bird species shall have an avoidance buffer of 300 feet. These buffers may be reduced in consultation with the CDFW. [Mitigation Measure IV-2] Prior to Grading Permits/Planning*
- V-1 *Cultural Resources Monitoring:*** *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. [Mitigation Measure V-1] During Grading*
- V-2** In the event that Native American cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, San Manuel Band of Mission Indians will be contacted if any such find occurs and be provided information and permitted/invited to perform a site visit when the archaeologist makes his/her assessment, so as to provide Tribal input. [Mitigation Measure V-2] During Grading
- V-3** If significant Native American historical resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, an SOI-qualified archaeologist shall be retained to develop a cultural resources Treatment Plan, as well as a Discovery and Monitoring Plan, the drafts of which shall be provided to San Manuel Band of Mission Indians for review and comment.
- a. All in-field investigations, assessments, and/or data recovery enacted pursuant to the finalized Treatment Plan shall be monitored by a San Manuel Band of Mission Indians Tribal Participant(s).
  - b. The Lead Agency and/or applicant shall, in good faith, consult with San Manuel Band of Mission Indians on the disposition and treatment of any artifacts or other cultural materials encountered during the project.

[Mitigation Measure V-3] During Grading

**Project Mitigation**

- XVI-1 **Regional Transportation Fee.** 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 by a cashier's check 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 190,086 sq. ft. building per the site plan dated June 29, 2017.

Therefore, the estimated Regional Transportation Fees for the Project is \$ 458,107.26. The current Regional Transportation Development Mitigation Plan can be found at the following website: <http://cms.sbcounty.gov/dpw/Transportation/TransportationPlanning.aspx>

- XVI-2 The Applicant shall be responsible for the construction of all site-adjacent roadway improvements:

**San Bernardino Avenue:** Prior to the issuance of an occupancy permit from the County of San Bernardino, San Bernardino, between the project's western and eastern boundaries shall be constructed to its ultimate half-section width as a Major Arterial Highway (104-foot right-of-way), consistent with the circulation recommendations found in the County of San Bernardino General Plan. The roadway cross-section is proposed to include three travel lanes in each direction and a sidewalk in each direction.

- XVI-3 The Applicant shall be responsible for the construction of all site access point improvements:

**San Bernardino Avenue at Driveway 1:** Construct project driveway. Restripe the intersection to provide northbound right-in-right-out access only. Construct a second eastbound through lane. Restripe the eastbound right-turn lane as an eastbound shared through-right-turn lane. Construct the second and third westbound through lanes (per San Bernardino Avenue improvement).

**San Bernardino Avenue at Packinghouse Driveway:** Construct a westbound left-turn lane and the second and third westbound through lanes (per San Bernardino Avenue improvement).

- XVI-4 **San Bernardino Avenue at Alabama Street:** Construct a third eastbound through lane and restripe to provide two westbound through lanes and a westbound shared through-right-turn lane. The improvements are to be installed as other area projects develop as determined by the County.

**Cumulative Improvements: 2040 Mitigation Requirements**

- XVI-5 **San Bernardino Avenue at Packinghouse Driveway:** Construct a second eastbound through lane and restripe the right-turn lane as an eastbound shared through-right-turn lane. The improvements are to be installed as other area projects develop as determined by the County. The Applicant shall pay a fair share contribution for the intersection improvements.

- XVI-6 **San Bernardino Avenue at Alabama Street:** Construct a third northbound through lane and a third southbound through lane. Restripe to provide two westbound through lanes and a westbound shared through-right turn lane and a second southbound left turn lane. The improvements are to be installed as other area projects develop as determined by the County.

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## **EXHIBIT F**

Comment Letters from SCAQMD, San Bernardino County  
Public Works, Caltrans, and Packinghouse Christian  
Fellowship



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
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SENT VIA E-MAIL AND USPS:

April 17, 2018

[aron.liang@lus.sbcounty.gov](mailto:aron.liang@lus.sbcounty.gov)

Aron Liang, Senior Planner

County of San Bernardino

Land Use Services Department – Planning Division

385 North Arrowhead Avenue, First Floor

San Bernardino, CA 92415-0187

## **Mitigated Negative Declaration (MND) for the Proposed Redlands Commerce Center**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final MND.

### SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to build a 190,086-square-foot warehouse building on 8.45 acres (Proposed Project). At the time of the MND, tenants are unknown. Based on a review of Figure 2, *Project Vicinity*, in the MND and aerial photographs, SCAQMD staff found that the Proposed Project is surrounded by industrial and/or commercial uses. Construction of the Proposed Project is expected to take 13 months to complete<sup>1</sup>.

### SCAQMD Staff's Comments

The Notice of Availability (NOA)/Notice of Intent (NOI) for the MND was updated on April 6, 2018<sup>2</sup>. Upon a review of the NOA/NOI, SCAQMD staff found that the public review and comment period on the MND closes on April 19, 2018<sup>3</sup>. However, the NOA/NOI did not specify the beginning date of the public review and comment period to support that the MND will be publicly circulated for a minimum 20 days pursuant to the CEQA requirements (CEQA Guidelines Section 15072(d)). Additionally, SCAQMD staff received a hardcopy of the MND for review on April 10, 2018, and no appendices or technical documents related to the Proposed Project's air quality analysis (e.g., modeling input and output files and emissions calculation sheets) were included in the MND for review. While the Proposed Project's long-term operational emissions were calculated based on the traffic data from the traffic impact study, this study was not included in the MND for review. Given the limited review time and absence of all files and supporting documentation in both PDF and electronic files, SCAQMD staff is submitting the following comments to the Lead Agency for consideration.

### *Daily Truck Trip Rate*

According to the Air Quality Section, the Proposed Project's long-term operational emissions were calculated based on the traffic data, and the daily truck trips were based on the City of Fontana Truck Trip Generation Study (Fontana Study). In other words, the Fontana Study was used to estimate the Proposed Project's air quality operational impacts in the CalEEMod modeling. Absent from a specific traffic study

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<sup>1</sup> MND. Page 3 of 78.

<sup>2</sup> San Bernardino County Land Use Services. Accessed by SCAQMD staff on April 11, 2018. Available at: <http://cms.sbcounty.gov/lus/Planning/Environmental/Valley.aspx>.

<sup>3</sup> San Bernardino County Land Use Services. Accessed by SCAQMD staff on April 11, 2018. Available at: <http://www.sbcounty.gov/Uploads/lus/Environmental/Notice%20of%20Availability%20P201700142.pdf>.



of known tenants, SCAQMD staff recommends that the Final MND use the ITE's daily truck trip rate of 0.64 to estimate daily truck trips to avoid underestimating the Proposed Project's truck trips and associated long-term operational emissions and health impacts.

#### *Additional Recommended Mitigation Measures*

While the Lead Agency found that the Proposed Project's long-term operational impacts would be less than significant, SCAQMD staff recommends that the Lead Agency incorporate the following mitigation measures in the Final MND to further reduce the Proposed Project's long-term NOx emissions. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website<sup>4</sup>.

1. Require the use of 2010 and newer haul trucks (e.g., material delivery trucks and soil import/export). In the event that that 2010 model year or newer diesel haul trucks cannot be obtained, provide documentation as information becomes available and use trucks that meet EPA 2007 model year NOx emissions requirements<sup>5</sup>, at a minimum. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
2. Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
3. Develop, adopt, and enforce truck routes in and out of facilities.
4. Limit the daily number of trucks allowed at the facility to levels analyzed in the Final MND. If higher daily truck trips are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Project's impacts through CEQA prior to allowing this land use or higher activity level.
5. Provide electric vehicle (EV) Charging Stations (see the discussion below regarding EV charging stations).
6. Should the Proposed Project generate significant regional emissions, the Lead Agency should require mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in health risks, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the Final MND, the Lead Agency should require a phase-in schedule for these cleaner operating trucks to reduce project impacts. SCAQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency and Project applicant.
7. Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts from this project. Further, trucks that run at least partially on electricity are projected to become available during the life of the project as discussed in the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy<sup>6</sup>. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, SCAQMD staff recommends the Lead Agency require the proposed warehouse and other plan areas that allow truck parking to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. Similar to the City of Los Angeles requirements for all new projects, SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle

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<sup>4</sup> South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

<sup>5</sup> Based on a review of the California Air Resources Board's diesel truck regulations, 2010 model year diesel haul trucks should have already been available and can be obtained in a successful manner for the project construction California Air Resources Board. March 2016. Available at: <http://www.truckload.org/tca/files/ccLibraryFiles/Filename/000000003422/California-Clean-Truck-and-Trailer-Update.pdf> (See slide #23).

<sup>6</sup> Southern California Association of Governments. Adopted April 7, 2016. Available at: <http://scagtrpdocs.net/Pages/default.aspx>.

parking spaces (including for trucks) include EV charging stations.<sup>7</sup> Further, electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should appropriately sized to allow for future expanded use.

8. Create a buffer zone of at least 300 meters (roughly 1,000 feet), which can be office space, employee parking, greenbelt, etc. between the warehouse/distribution center and sensitive receptors, if applicable to the Proposed Project.
9. Design the warehouse/distribution center such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors, if applicable to the Proposed project.
10. Design the warehouse/distribution center such that any check-in point for trucks is well inside the Proposed Project to ensure that there are no trucks queuing outside of the facility boundaries.
11. Design the warehouse/distribution center to ensure that truck traffic within the Proposed Project is located away from the property line(s) closest to residences or sensitive receptors, if applicable to the Proposed Project.
12. Restrict overnight parking in residential areas, if applicable to the Proposed Project.
13. Establish overnight parking within the warehouse/distribution center where trucks can rest overnight.
14. Establish designated area(s) within the Proposed Project for repair needs away from residences or sensitive receptors, if applicable to the Proposed Project.

### Closing

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) if you have any questions regarding the enclosed comments.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

SBC180410-10

Control Number

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<sup>7</sup> City of Los Angeles. March 30, 2017. Accessed at:  
[http://ladbs.org/LADBSWeb/LADBS\\_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf](http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf).

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 8

PLANNING (MS 725)

464 WEST 4th STREET, 6<sup>th</sup>FLOOR  
SAN BERNARDINO, CA 92401-1400

PHONE (909) 388-7017

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FISCAL ADMIN

2018 APR 12 AM 8:47

Making Conservation  
a California Way of Life.

April 10, 2018

File: 08-SBd-210-PM R32.283

Aron Liang  
Senior Planner, Land Use Services Department  
County of San Bernardino  
385 North Arrowhead Avenue  
San Bernardino, CA 92415

**Subject: Redlands Commerce Center – Mitigated Negative Declaration**

Dear Mr. Liang:

The California Department of Transportation (Caltrans) has reviewed the Mitigated Negative Declaration for the Redlands Commerce Center (Project), located on the north side of San Bernardino Avenue and approximately 620 feet west of Alabama Street in unincorporated San Bernardino County. The project proposes to construct and operate a 190,086 square feet warehouse distribution center.

As the owner and operator of the State Highway System (SHS), it is our responsibility to coordinate and consult with local jurisdictions when a proposed development may impact our facilities. As the responsible agency under the California Environmental Quality Act, it is also our responsibility to make recommendations to offset associated impacts with the proposed project. Although the project is under the jurisdiction of the County of San Bernardino, due to the project's potential impact to the State facilities, it is also subject to the policies and regulations that govern the SHS. We offer the following comments:

- 1) **Submit three hard copies and one electronic file of all Traffic Impact Analysis (TIA) documents for review.** All State facilities within 5-mile radius of the Project should be analyzed in the TIA. The data used in the TIA should not be more than 2 years old, and shall be based on the Southern California Association of Governments 2016 Regional Transportation Plan Model. Use the Highway Capacity Manual 6 methodology for all traffic analyses. (See *Caltrans Guide for the Preparation of Traffic Impact Studies* at [http://www.dot.ca.gov/hq/tpp/offices/ocp/igr\\_ceqa\\_files/tisguide.pdf](http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf))

Caltrans is committed to providing a safe transportation system for all users. We encourage the County to embark a safe, sustainable, integrated and efficient transportation system and complete street to enhance California's economy and livability. A pedestrian/bike-friendly environment

Mr. Rincon  
November 16, 2017  
Page 2

served by multimodal transportation would reduce traffic congestion prevalent in the surrounding areas. (See *Complete Street Implementation Action Plan 2.0* at [http://www.dot.ca.gov/hq/tpp/offices/ocp/docs/CSIAP2\\_rpt.pdf](http://www.dot.ca.gov/hq/tpp/offices/ocp/docs/CSIAP2_rpt.pdf)).

These recommendations are preliminary and summarize our review of materials provided for our evaluation. Please continue to keep us informed of this project and other future updates, which could potentially impact the SHS and interfacing transportation facilities. If you have any questions regarding this letter, please contact Jacob Mathew at (909) 806-3928 or myself at (909) 383-4557.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Roberts". The signature is fluid and cursive, with the first name "Mark" being more prominent than the last name "Roberts".

MARK ROBERTS  
Office Chief, AICP  
Intergovernmental Review, Community and Regional Planning





## Department of Public Works

- Flood Control
- Operations
- Solid Waste Management
- Surveyor
- Transportation

Kevin Blakeslee, P.E.  
Director

### Transmitted Via Email

April 19, 2018

County of San Bernardino  
Aron Liang, Senior Planner  
Land Use Services Department  
385 N. Arrowhead Ave., First Floor  
San Bernardino, CA. 92415-0187

File: 10(ENV)-4.01

**RE: CEQA – NOTICE OF AVAILABILITY OF A MITIGATED NEGATIVE DECLARATION  
FOR THE REDLANDS COMMERCE CENTER PROJECT FOR LUSD**

Dear Mr. Liang:

Thank you for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. **We received this request on April 9, 2018** and pursuant to our review, the following comments are provided:

**Permits/Operations Support Division (Melissa Walker, Chief, 909-387-7995):**

Any proposed work within County road right-of-way will require a Transportation permit from San Bernardino County Department of Public Works – Permits/Operations Support Division – Transportation Section. If these permits are required, their necessity and any impacts associated with the construction should be addressed in the IS/MND prior to adoption and certification.

We respectfully request to be included on the circulation list for all project notices, public reviews, or public hearings. In closing, I would like to thank you again for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. Should you have any questions or need additional clarification, please contact the individuals who provided the specific comment, as listed above.

Sincerely,

**Michael R. Perry**  
Supervising Planner  
Environmental Management

MRP:PE:sr  
Email: [Aron.liang@lus.sbcounty.gov](mailto:Aron.liang@lus.sbcounty.gov)

### BOARD OF SUPERVISORS

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128 of 148

JOSIE GONZALES  
Fifth District

Gary McBride  
Chief Executive Officer

**From:** Jay Ward [<mailto:jay@wardattorneys.com>]  
**Sent:** Friday, April 06, 2018 9:56 AM  
**To:** Liang, Aron <[Aron.Liang@lus.sbcounty.gov](mailto:Aron.Liang@lus.sbcounty.gov)>  
**Cc:** Ed Rea ([ccredlands@aol.com](mailto:ccredlands@aol.com)) <[ccredlands@aol.com](mailto:ccredlands@aol.com)>; Ken Kienow ([kkienow@charter.net](mailto:kkienow@charter.net)) <[kkienow@charter.net](mailto:kkienow@charter.net)>  
**Subject:** RE: Newcastle Partners Project No. P201700142/CUP

Hi Aron. As I noted in my July 12, 2017, email to you (at the end of this string), I have a concern that street improvement work not unduly interfere with normal church and school operations. Of a particular concern, of course, is Sunday services. What are the construction-related conditions of approval which would adequately address these concerns regarding construction items XVI-2 – XVI-6 on pages 67-68 of the initial study? Please advise. Thank you. Jay

*William J. Ward, SBN 106817*

**WARD & WARD**

Attorneys at Law

202 E. Airport Dr., Suite 120

San Bernardino California 92408

Telephone: (909) 381-8350

Facsimile: (909) 381-8356

**From:** Liang, Aron [<mailto:Aron.Liang@lus.sbcounty.gov>]  
**Sent:** Friday, April 6, 2018 9:29 AM  
**To:** Jay Ward <[jay@wardattorneys.com](mailto:jay@wardattorneys.com)>  
**Cc:** Ed Rea ([ccredlands@aol.com](mailto:ccredlands@aol.com)) <[ccredlands@aol.com](mailto:ccredlands@aol.com)>; Ken Kienow ([kkienow@charter.net](mailto:kkienow@charter.net)) <[kkienow@charter.net](mailto:kkienow@charter.net)>  
**Subject:** RE: Newcastle Partners Project No. P201700142/CUP

Hi Jay, sorry, missed your call yesterday. I left a v-message for you this morning. Per my v-message this morning, the link to the Initial Study for the above project:

<http://www.sbcounty.gov/Uploads/lus/Environmental/Initial%20Study.pdf>

Thank you.



## **EXHIBIT G**

### Responses to Comments



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

SENT VIA E-MAIL AND USPS:

April 17, 2018

[aron.liang@lus.sbcounty.gov](mailto:aron.liang@lus.sbcounty.gov)

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#### *Additional Recommended Mitigation Measures*

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1. Require the use of 2010 and newer haul trucks (e.g., material delivery trucks and soil import/export). In the event that that 2010 model year or newer diesel haul trucks cannot be obtained, provide documentation as information becomes available and use trucks that meet EPA 2007 model year NOx emissions requirements<sup>5</sup>, at a minimum. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
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<sup>6</sup> Southern California Association of Governments. Adopted April 7, 2016. Available at: <http://scagtrpdocs.net/Pages/default.aspx>.

parking spaces (including for trucks) include EV charging stations.<sup>7</sup> Further, electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should appropriately sized to allow for future expanded use.

8. Create a buffer zone of at least 300 meters (roughly 1,000 feet), which can be office space, employee parking, greenbelt, etc. between the warehouse/distribution center and sensitive receptors, if applicable to the Proposed Project.
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10. Design the warehouse/distribution center such that any check-in point for trucks is well inside the Proposed Project to ensure that there are no trucks queuing outside of the facility boundaries.
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13. Establish overnight parking within the warehouse/distribution center where trucks can rest overnight.
14. Establish designated area(s) within the Proposed Project for repair needs away from residences or sensitive receptors, if applicable to the Proposed Project.

### Closing

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SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) if you have any questions regarding the enclosed comments.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

SBC180410-10

Control Number

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<sup>7</sup> City of Los Angeles. March 30, 2017. Accessed at:  
[http://ladbs.org/LADBSWeb/LADBS\\_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf](http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf).

May 4, 2018

Ms. Karina Fidler  
Kimley-Horn  
401 B Street, Suite 600  
San Diego, CA 92101

**SUBJECT: REDLANDS COMMERCE CENTER RESPONSE TO SCAQMD COMMENTS**

Dear Ms. Karina Fidler:

Urban Crossroads, Inc. is pleased to submit this Response to SCAQMD Comments Memorandum (Memo) to Kimley-Horn for the Redlands Commerce Center ("Project"), which is located in the County of San Bernardino.

**RESPONSE TO COMMENT 1**

The Notice of Availability (NOA) which is available on the County's website clearly states that all materials related to the MND and technical studies are available for review at the Land Use Services Department – Planning Division. Notwithstanding, separate technical modeling files have been made available for download at the following location:

<https://securisync.intermedia.net/us2/s/XxZWFPXUNnmcCry41vMILy00119c3c>

**RESPONSE TO COMMENT 2**

The Fontana Truck Trip Generation Study was only utilized to identify the vehicle splits for the trip generation associated with the warehouse (ITE 150). The use of the City of Fontana Truck Trip Generation Study (Fontana Truck Study) truck rates is reasonable and appropriate as that study, and the truck rate percentages, was based upon data collected from similar operations within the Inland Empire.

More specifically, when using the ITE Land Use Code 150, ITE also recommends a truck percentage of 20% (*Appendix J: Truck Trip Generation Research and Data – Trip Generation Handbook 3<sup>rd</sup> Edition*, ITE 2014), which is consistent with the methodology used in the MND and underlying technical reports. As such, the MND correctly applies an approximate 20% truck mix to the overall trip rate for warehouse uses.

Moreover, this is a small project consisting of approximately 190,086 square feet of warehouse use. The uses that are anticipated to occupy a smaller building such as this are expected to be less truck intensive as one may expect to see in a large million square foot high cube warehouse and distribution center. This is so, because 750,000 and million square foot buildings lend themselves to more extensive trucking operations, whereas smaller buildings such as this do not. This is supported by data in ITE's *Trip Generation Handbook, 9<sup>th</sup> Edition*. Based on the surveyed data included in ITE's *Trip Generation*

*Handbook*, use of the High-Cube Warehouse (ITE 152) rates would not be appropriate for the Project since the average building size in the survey data for High-Cube Warehouse is approximately 834,000 square feet with more than fifty percent of the data set being greater than 500,000 square feet. Further, the SCAQMD's comment related to 0.64 trucks per thousand square feet applies to high-cube warehouse distribution centers and not to smaller warehouse projects such as the one proposed.

As such, the MND correctly applies an approximate 20% truck mix to the overall trip rate. The County's expert disagrees with the unsubstantiated comments made by the commenter. As stated herein, the MND and underlying technical reports are based on a conservative estimate of trucks. No changes to the MND or underlying technical studies are warranted.

### **RESPONSE TO COMMENT 3**

We appreciate the SCAQMD's recommendations for incorporating additional mitigation measures to further reduce impacts, however, we would like to remind the SCAQMD that no additional mitigation is necessary since the MND identifies no significant impacts would occur. As such, there is no CEQA nexus to require implementation of additional mitigation measures. Notwithstanding, some of the SCAQMD's recommendations are already part of the Project's design and will be incorporated by the Project. More specific responses to each of the recommended measures is as follows:

1. The Project, as noted in the MND does not result in a significant impact, as such, there is no nexus to require additional mitigation requiring the phase-in of newer engines beyond what is required by law.
2. The Project is not near residents and would not enter residential areas.
3. The Project would be required to comply with adopted truck routes by local agencies.
4. This is not a requirement under CEQA, which requires a project to evaluate reasonable and foreseeable impacts. The number of daily truck trips has been reasonably estimated based on data from the Institute of Transportation Engineers (ITE) as discussed in the MND. It should be noted that imposing a cap on daily trucks at the facility will not "avoid or substantially" lessen the estimated emissions. Therefore, this would not mitigate estimated emissions. Moreover, limiting daily truck visits could result in the unintended adverse effect of trucks idling and queuing outside of the facility until midnight of the following day if the facility's limit is reached on a given day. This would result in increased emissions, and potentially added traffic congestion around the facility.
5. As part of the conditions of approval, as outlined in the initial study for the Project, on-site electrical power connections will be provided.
6. As previously noted, the Project would not result in any significant impacts therefore this measure is not required.



7. As part of the conditions of approval, as outlined in the initial study for the Project, on-site electrical power connections will be provided. At a minimum, electrical panels will be appropriately sized to allow for future expanded use for trucks to plug-in.
8. There are no residential land uses within 1,000 feet of the Project. In fact, the nearest residential home is located approximately 1 mile southeast of the Project site as identified in the MND.
9. This measure is not applicable as there are no nearby sensitive receptors that would be impacted.
10. The Project site is designed such that there would be no off-site queuing.
11. This measure is not applicable as there are no nearby sensitive receptors that would be impacted.
12. This measure is not applicable as there are no nearby sensitive receptors that would be impacted.
13. The Project site could potentially operate 24 hours per day and as such, appropriate parking is provided on-site.
14. There are no residences in close proximity to the site and although there are sensitive receptors in the vicinity of the site, there are no designated repair areas currently identified on the site plan.

If you have any questions, please contact me directly at (949) 336-5987.

Respectfully submitted,

URBAN CROSSROADS, INC.

Haseeb Qureshi,  
Senior Associate

**DEPARTMENT OF TRANSPORTATION****DISTRICT 8****PLANNING (MS 725)****464 WEST 4th STREET, 6th FLOOR****SAN BERNARDINO, CA 92401-1400****PHONE (909) 388-7017****FAX (909) 383-5936****TTY 711****www.dot.ca.gov/dlst8**

FISCAL ADMIN

2018 APR 12 AM 8:47

*Making Conservation  
a California Way of Life.***April 10, 2018****File: 08-SBd-210-PM R32.283****Aron Liang****Senior Planner, Land Use Services Department****County of San Bernardino****385 North Arrowhead Avenue****San Bernardino, CA 92415****Subject: Redlands Commerce Center – Mitigated Negative Declaration****Dear Mr. Liang:**

The California Department of Transportation (Caltrans) has reviewed the Mitigated Negative Declaration for the Redlands Commerce Center (Project), located on the north side of San Bernardino Avenue and approximately 620 feet west of Alabama Street in unincorporated San Bernardino County. The project proposes to construct and operate a 190,086 square foot warehouse distribution center.

As the owner and operator of the State Highway System (SHS), it is our responsibility to coordinate and consult with local jurisdictions when a proposed development may impact our facilities. As the responsible agency under the California Environmental Quality Act, it is also our responsibility to make recommendations to offset associated impacts with the proposed project. Although the project is under the jurisdiction of the County of San Bernardino, due to the project's potential impact to the State facilities, it is also subject to the policies and regulations that govern the SHS. We offer the following comments:

- 1) **Submit three hard copies and one electronic file of all Traffic Impact Analysis (TIA) documents for review.** All State facilities within 5-mile radius of the Project should be analyzed in the TIA. The data used in the TIA should not be more than 2 years old, and shall be based on the Southern California Association of Governments 2016 Regional Transportation Plan Model. Use the Highway Capacity Manual 6 methodology for all traffic analyses. (See *Caltrans Guide for the Preparation of Traffic Impact Studies* at [http://www.dot.ca.gov/hq/tpp/offices/ocp/igr\\_cega\\_files/tiaguide.pdf](http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_cega_files/tiaguide.pdf))

Caltrans is committed to providing a safe transportation system for all users. We encourage the County to embark a safe, sustainable, integrated and efficient transportation system and complete street to enhance California's economy and livability. A pedestrian/bike-friendly environment

*"Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability"*

Mr. Rincon  
November 16, 2017  
Page 2

served by multimodal transportation would reduce traffic congestion prevalent in the surrounding areas. (See *Complete Street Implementation Action Plan 2.0* at [http://www.dot.ca.gov/hq/tpp/offices/csp/docs/CSIAP2\\_rpt.pdf](http://www.dot.ca.gov/hq/tpp/offices/csp/docs/CSIAP2_rpt.pdf)).

These recommendations are preliminary and summarize our review of materials provided for our evaluation. Please continue to keep us informed of this project and other future updates, which could potentially impact the SHS and interfacing transportation facilities. If you have any questions regarding this letter, please contact Jacob Mathew at (909) 806-3928 or myself at (909) 383-4557.

Sincerely,



MARK ROBERTS  
Office Chief, AICP  
Intergovernmental Review, Community and Regional Planning

## MEMORANDUM

**To:** Aron Liang  
Senior Planner, San Bernardino County  
Land Use Services Department

**From:** Karina Fidler  
Kimley-Horn and Associates, Inc.

**Date:** May 2, 2018

**Subject:** Redlands Commerce Center – Mitigated Negative Declaration

---

## RESPONSE TO COMMENTS:

1. **Comment:** Submit three hard copies and one electronic file of all Traffic Impact Analysis (TIA) documents for review. All State facilities within 5-mile radius of the Project should be analyzed in the TIA. The data used in the TIA should not be more than 2 years old, and shall be based on the Southern California Association of Governments 2016 Regional Transportation Plan Model. Use the Highway Capacity Manual 6 methodology for all traffic analyses. (See Caltrans Guide for the Preparation of Traffic Impact Studies at [http://www.dot.ca.gov/hq/tpp/officcs/ocp/lgr\\_cega\\_files/tisguide.pdf](http://www.dot.ca.gov/hq/tpp/officcs/ocp/lgr_cega_files/tisguide.pdf))

**Response:** The Traffic Impact Analysis (TIA) including all Appendices were submitted to Caltrans for review on April 26, 2018.

There are fewer than 25 two-way peak hour trips anticipated to head southbound on Alabama Avenue towards the I-10 freeway and fewer than 20 two-way peak hour trips anticipated to head eastbound on San Bernardino Avenue towards the I-210 Freeway. As such, the Caltrans ramps and freeway facilities along Alabama Avenue and San Bernardino Avenue were not included for the purposes of this analysis. Traffic counts collected for this traffic study were conducted in January 2017.

Per the approved scoping agreement with the lead agency, the Horizon Year forecasts were developed from the SBTAM traffic model. Socioeconomic data utilized in the SBTAM reflects the data included in the 2016 Regional Transportation Plan (RTP) within the County of San Bernardino, and is a more focused sub-area model based on the SCAG regional traffic model.

The recently published HCM 6th Edition builds on the multimodal analysis introduced in HCM 2010 and integrates pedestrians and bicyclists within several chapters of the HCM. It is our understanding that the overall vehicular methodologies in HCM 6th Edition remain similar to those in HCM 2010. While there are a few changes and additions, no major changes in the

results are expected from those reported in the TIA. Further, Caltrans and other agencies are yet to transition to HCM 6 analysis. For example, Synchro version 8 used by Caltrans would support HCM 2010 only.

Please feel free to contact me at (619) 234-9411 with any questions regarding this submittal.

Sincerely,

KIMLEY-HORN AND ASSOCIATES, INC.



**Karina Fidler**



## Department of Public Works

- Flood Control
- Operations
- Solid Waste Management
- Surveyor
- Transportation

Kevin Blakeslee, P.E.  
Director

### Transmitted Via Email

April 19, 2018

County of San Bernardino  
Aron Liang, Senior Planner  
Land Use Services Department  
385 N. Arrowhead Ave., First Floor  
San Bernardino, CA. 92415-0187

File: 10(ENV)-4.01

**RE: CEQA – NOTICE OF AVAILABILITY OF A MITIGATED NEGATIVE DECLARATION  
FOR THE REDLANDS COMMERCE CENTER PROJECT FOR LUSD**

Dear Mr. Liang:


Thank you for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. We received this request on April 9, 2018 and pursuant to our review, the following comments are provided:

**Permits/Operations Support Division (Melissa Walker, Chief, 909-387-7995):**

Any proposed work within County road right-of-way will require a Transportation permit from San Bernardino County Department of Public Works – Permits/Operations Support Division – Transportation Section. If these permits are required, their necessity and any impacts associated with the construction should be addressed in the IS/MND prior to adoption and certification.

We respectfully request to be included on the circulation list for all project notices, public reviews, or public hearings. In closing, I would like to thank you again for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. Should you have any questions or need additional clarification, please contact the individuals who provided the specific comment, as listed above.

Sincerely,

  
**Michael R. Perry**  
Supervising Planner  
Environmental Management

MRP:PE:er  
Email: [Aron.Liang@lus.sbcounty.gov](mailto:Aron.Liang@lus.sbcounty.gov)

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## MEMORANDUM

To: Aron Liang  
Senior Planner, San Bernardino County  
Land Use Services Department

From: Karina Fidler  
Kimley-Horn and Associates, Inc.

Date: May 2, 2018

Subject: Redlands Commerce Center – Mitigated Negative Declaration

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## RESPONSE TO COMMENTS:

1. Comment: Any proposed work within County road right-of-way will require a Transportation permit from San Bernardino County Department of Public Works- Permits/Operations Support Division- Transportation Section. If these permits are required, their necessity and any impacts associated with the construction should be addressed in the IS/ MND prior to adoption and certification.

**Response:** Comment noted. Improvements within the County right-of-way have been addressed within the IS/MND.

Please feel free to contact me at (619) 234-9411 with any questions regarding this submittal.

Sincerely,

KIMLEY-HORN AND ASSOCIATES, INC.

A handwritten signature in black ink, appearing to read "Karina Fidler".

Karina Fidler

**From:** Jay Ward [<mailto:jay@wardattorneys.com>]  
**Sent:** Friday, April 06, 2018 9:56 AM  
**To:** Liang, Aron <[Aron.Liang@lus.sbcounty.gov](mailto:Aron.Liang@lus.sbcounty.gov)>  
**Cc:** Ed Rea ([ccredlands@aol.com](mailto:ccredlands@aol.com)) <[ccredlands@aol.com](mailto:ccredlands@aol.com)>; Ken Kienow ([kkienow@charter.net](mailto:kkienow@charter.net)) <[kkienow@charter.net](mailto:kkienow@charter.net)>  
**Subject:** RE: Newcastle Partners Project No. P201700142/CUP

Hi Aron. As I noted in my July 12, 2017, email to you (at the end of this string), I have a concern that street improvement work not unduly interfere with normal church and school operations. Of a particular concern, of course, is Sunday services. What are the construction-related conditions of approval which would adequately address these concerns regarding construction items XVI-2 – XVI-6 on pages 67-68 of the initial study? Please advise. Thank you. Jay

*William J. Ward, SBN 106817*

**WARD & WARD**

Attorneys at Law

202 E. Airport Dr., Suite 120

San Bernardino California 92408

Telephone: (909) 381-8350

Facsimile: (909) 381-8356

**From:** Liang, Aron [<mailto:Aron.Liang@lus.sbcounty.gov>]  
**Sent:** Friday, April 6, 2018 9:29 AM  
**To:** Jay Ward <[jay@wardattorneys.com](mailto:jay@wardattorneys.com)>  
**Cc:** Ed Rea ([ccredlands@aol.com](mailto:ccredlands@aol.com)) <[ccredlands@aol.com](mailto:ccredlands@aol.com)>; Ken Kienow ([kkienow@charter.net](mailto:kkienow@charter.net)) <[kkienow@charter.net](mailto:kkienow@charter.net)>  
**Subject:** RE: Newcastle Partners Project No. P201700142/CUP

Hi Jay, sorry, missed your call yesterday. I left a v-message for you this morning. Per my v-message this morning, the link to the Initial Study for the above project:

<http://www.sbcounty.gov/Uploads/lus/Environmental/Initial%20Study.pdf>

Thank you.

## MEMORANDUM

To: Aron Liang  
Senior Planner, San Bernardino County  
Land Use Services Department

From: Karina Fidler  
Kimley-Horn and Associates, Inc.

Date: May 23, 2018

Subject: Redlands Commerce Center – Mitigated Negative Declaration

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### RESPONSE TO COMMENTS:

The following discussion is in response to comments received April 6, 2018 from William J. Ward with Ward & Ward to Aron Liang at the County of San Bernardino.

1. Comment: I have a concern that street improvement work not unduly interfere with normal church and school operations. Of a particular concern, of course, is Sunday services.  
**Response:** Access to the school and church will be maintained during construction of the proposed Project. Construction would not occur on Sundays.
2. Comment: What are the construction-related conditions of approval which would adequately address these concerns regarding construction items XVI-2 – XVI-6 on pages 67-68 of the initial study?  
**Response:** A traffic control plan would be prepared and approved by the County prior to construction of the improvements noted in Mitigation Measures XVI-2 through XVI-6 in the Initial Study. However, access to the school and church will be maintained during construction of the proposed Project.

Please feel free to contact me at (619) 234-9411 with any questions regarding this submittal.

Sincerely,

KIMLEY-HORN AND ASSOCIATES, INC.



Karina Fidler, AICP

## Liang, Aron

---

**From:** Liang, Aron  
**Sent:** Friday, June 29, 2018 11:37 AM  
**To:** 'Jay Ward'  
**Cc:** Ed Rea (ccredlands@aol.com); 'kkienow@charter.net'  
**Subject:** Newcastle Partners Project No. P201700142/CUP  
**Attachments:** Response to Comments Memo\_ward.pdf

Hi Jay, this is a follow-up on the above, in twofold:

1. Attached, the applicant representative's response to your comments/concerns on the above. I would note, the traffic study roadway segments are currently operating at acceptable level. As proposed, with project design, project mitigations, and project conditions of approval, including traffic control plans requirement, the traffic conditions are expected to operate at acceptable conditions.
2. Traffic Control Plans Requirement – the traffic control plans are part of the road construction permit issuance. The traffic control plans would be submitted to the Traffic Division for review and approval prior to actual construction takes place and/or prior to grading permit issuance, if grading activities were to be conducted within the road right-of-way. In summary, the traffic control plans are required of the construction and/or encroachment permit issuance, to ensure traffic impacts, if any, associated with the proposed project would be minimal to surrounding land uses.

Please let me know if you have questions.

### Aron Liang

Senior Planner  
Land Use Services Department  
Phone: 909-387-0235  
Fax: 909-387-3223  
385 N. Arrowhead Ave  
San Bernardino, CA, 92415-0187



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**From:** Jay Ward [<mailto:jay@wardattorneys.com>]  
**Sent:** Friday, April 06, 2018 9:56 AM  
**To:** Liang, Aron <[Aron.Liang@lus.sbcounty.gov](mailto:Aron.Liang@lus.sbcounty.gov)>  
**Cc:** Ed Rea (<[ccredlands@aol.com](mailto:ccredlands@aol.com)> <[ccredlands@aol.com](mailto:ccredlands@aol.com)>); Ken Kienow (<[kkienow@charter.net](mailto:kkienow@charter.net)> <[kkienow@charter.net](mailto:kkienow@charter.net)>)  
**Subject:** RE: Newcastle Partners Project No. P201700142/CUP

Hi Aron. As I noted in my July 12, 2017, email to you (at the end of this string), I have a concern that street improvement work not unduly interfere with normal church and school operations. Of a particular concern, of course, is Sunday

services. What are the construction-related conditions of approval which would adequately address these concerns regarding construction items XVI-2 – XVI-6 on pages 67-68 of the Initial study? Please advise. Thank you. Jay

*William J. Ward, SBN 106817*

**WARD & WARD**

**Attorneys at Law**

[202 E. Airport Dr., Suite 120](#)

[San Bernardino California 92408](#)

**Telephone: (909) 381-8350**

**Facsimile: (909) 381-8356**

**From:** Liang, Aron [<mailto:Aron.Liang@lus.sbcounty.gov>]

**Sent:** Friday, April 6, 2018 9:29 AM

**To:** Jay Ward <[jay@wardattorneys.com](mailto:jay@wardattorneys.com)>

**Cc:** Ed Rea ([ccredlands@aol.com](mailto:ccredlands@aol.com)) <[ccredlands@aol.com](mailto:ccredlands@aol.com)>; Ken Kienow ([kkienow@charter.net](mailto:kkienow@charter.net)) <[kkienow@charter.net](mailto:kkienow@charter.net)>

**Subject:** RE: Newcastle Partners Project No. P201700142/CUP

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<http://www.sbcounty.gov/Uploads/lus/Environmental/Initial%20Study.pdf>

Thank you.

**Aron Liang**

Senior Planner  
**Land Use Services Department**  
Phone: 909-387-0235  
Fax: 909-387-3223  
[385 N. Arrowhead Ave](#)  
San Bernardino, CA, 92415-0187



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**From:** Jay Ward [<mailto:jay@wardattorneys.com>]  
**Sent:** Thursday, April 05, 2018 3:42 PM  
**To:** Liang, Aron <[Aron.Liang@lus.sbcounty.gov](mailto:Aron.Liang@lus.sbcounty.gov)>  
**Cc:** Ed Rea ([ccredlands@aol.com](mailto:ccredlands@aol.com)) <[ccredlands@aol.com](mailto:ccredlands@aol.com)>; Ken Klenow ([kkienow@charter.net](mailto:kkienow@charter.net)) <[kkienow@charter.net](mailto:kkienow@charter.net)>  
**Subject:** RE: Newcastle Partners Project No. P201700142/CUP

Hi Aron. I just left a voice message for you following the voice message you left for Ed Rea. Please call me at your earliest opportunity. Thank you. Jay

*William J. Ward, SBN 106817*

**WARD & WARD**

**Attorneys at Law**

**[202 E. Airport Dr., Suite 120](#)**

**[San Bernardino California 92408](#)**

**Telephone: (909) 381-8350**

**Facsimile: (909) 381-8356**



<SBC180410-10 MND Redlands Commerce Center.pdf>