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:	**0298-063-07 and 03**
APPLICANT:	800 Opal, LLC (Charles Walden)
COMMUNITY:	Mentone
LOCATION:	East side of Opal Ave., between Nice and Colton Avenues.
PROJECT NO:	P201700273
STAFF:	Chris Warrick
REP('S):	Thatcher Engineering & Assoc., Inc.
PROPOSAL:	General Plan Amendment to change the official land use zoning district from Single Residential (RS) to Community Industrial (IC) and a Conditional Use Permit to reestablish a manufacturing and warehouse operation, consisting of an existing 205,953 square foot manufacturing/warehouse building, with an 11,762 square foot office and a 35,600 square foot warehouse/storage building on 35.12 acres.

USGS Quad:	Redlands
T, R, Section:	**T: 1S R: 2W Sec. 19**
Planning Area:	Mentone
Land Use Zoning:	Single Residential (RS)
Overlays:	FP

PROJECT CONTACT INFORMATION:

Lead agency: County of San Bernardino
Land Use Services Department
385 N. Arrowhead Avenue, 1st Floor
San Bernardino, CA 92415-0182

Contact person: Chris Warrick, Planner
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PROJECT DESCRIPTION:

Summary

The proposed project consists of a is a General Plan Amendment (GPA) to change the Official Land Use Zoning District from Single Residential (RS) to Community Industrial (IC) and a Conditional Use Permit to reestablish a manufacturing and warehouse operation, consisting of an existing 205,953 square foot manufacturing/warehouse building, containing an 11,762 square foot office and a separate 35,600 square foot warehouse/storage building on 35.12 acres.

This site contains two existing warehouse buildings that were built in the 1970's. The buildings were operated by a furniture manufacturer for many years, until about five years

ago when the owner discontinued the manufacturing operations. The buildings have remained vacant and unused ever since. Soon after the business was discontinued the owner filed an application for a General Plan Amendment to change the land use designation from Community Industrial (IC) to Single Residential (RS) and a Tentative Tract Map to subdivide the property into 131 single family lots. The General Plan Amendment and Tentative Tract Map were approved by the Board of Supervisors in 2015. The owner has decided not to proceed with the residential project and now wants to reestablish the previous manufacturing use. This requires a new application for a General Plan Amendment to change the land use designation back to IC and Conditional Use Permit to reestablish the manufacturing use.

The subject property surrounds a small lot with an existing residential structure that is not a part of the project and is under separate ownership. Like the 800 Opal, LLC property, the land use designation of the residential lot was previously IC and was changed to RS when the previous General Plan Amendment and Tentative Map were approved. Although the land use designation was previously IC, the residential lot was considered to be a legal non-conforming use. The land use designation of this residential lot was changed to RS in order to be consistent with the previously approved Tentative Tract Map. Since the project proponent is now proposing to maintain the industrial buildings and revert back to the previous land use designation of IC, the County Planning Division is recommending that the designation of the residential lot also be reverted back to IC in order to be consistent with surrounding land use designations and uses. The residential lot will maintain its legal non-conforming status.

Local Setting
The area immediately surrounding the project site consists of industrial uses to the west, a residential housing and water reservoir to the north, a residential tract to the east, and Redlands East Valley High School to the South. The site is approximately 400 feet east of the City of Redlands jurisdictional boundary. Roadways in the project vicinity are paved. The site is bound on the west by Opal Avenue, the north by Nice Avenue and the south by Colton Avenue.

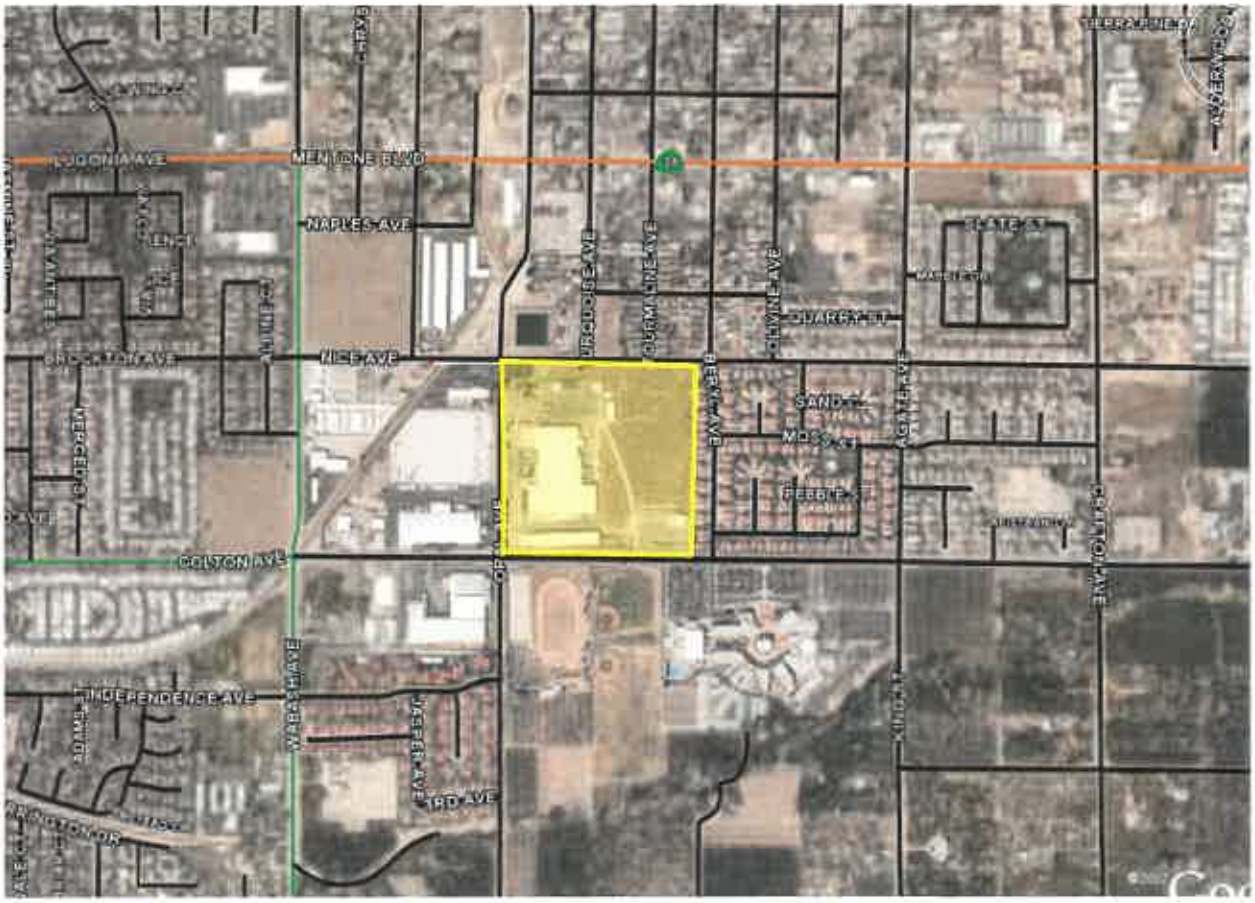
Project Site Location, Existing Site Land Uses and Conditions
The project site has previously been disturbed. There are two existing buildings on the site, which include a 205,953 square foot manufacturing/warehouse building, with 11,762 square feet office and a smaller 35,600 square foot storage building. Additionally, the site includes truck and passenger vehicle parking, fences, gates, hardscape areas, as well as some ornamental trees and vegetation. The site and surrounding vicinity is predominantly flat terrain. The project site has an elevation between 1650 and 1685 msl with a slight decrease in elevation to the east.

Existing General Plan Land Use Zoning Designations
Land uses on the project site and surrounding parcels are governed by the County's Zoning Code. The site's land use zoning designation is currently Single Residential (RS).

The project site is in the City of Redlands's Sphere of Influence Area. The City of Redlands's General Plan Land Use Designation and zoning for the site Industrial.

Existing Land Use and Land Use Zoning Districts		
Location	**Existing Land Use**	**Land Use Zoning District**
Project Site	Warehouse, Office, Truck Parking, Outside Storage, Open Space	Single Residential (RS)
North	Residential and Vacant Land	Single Residential (RS) and Community Industrial (IC)
South	Redlands East Valley High School	Institutional (IN)
East	Residential	Single Residential (RS)
West	Industrial	Community Industrial (IC)

Exhibit 1: Vicinity Map



EVALUATION FORMAT

This initial study is prepared in compliance with the California Environmental Quality Act (CEQA) pursuant to Public Resources Code Section 21000, et seq. and the State CEQA Guidelines (California Code of Regulations Section 15000, et seq.). Specifically, the preparation of an Initial Study is guided by Section 15063 of the State CEQA Guidelines. This format of the study is presented as follows. The project is evaluated based on its effect on 17 major categories of environmental factors. Each factor is reviewed by responding to a series of questions regarding the impact of the project on each element of the overall factor. The Initial Study checklist provides a formatted analysis that provides a determination of the effect of the project on the factor and its elements. The effect of the project is categorized into one of the following four categories of possible determinations:

Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant	No Impact

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

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

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

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below will 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.

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

DETERMINATION: (To be completed by the Lead Agency)

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 shall be prepared.
☒	Although the proposed project could have a significant effect on the environment, there shall not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION shall be prepared.
☐	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 Chris Warrick, Planner) — Date: 11-15-17

Signature: (David Prusch, Supervising Planner) — Date: 11-15-17
Land Use Services Department/Planning Division

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

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

a) **No Impact.** The proposed project is not located within a Scenic Corridor. The site is also not located in the proximity of a scenic vista. There is little topography in the area or other features from which there would be views of the region. The proposed project is located within an area where surrounding lands are already substantially developed with residential neighborhoods, industrial, and institutional uses.

b) **No Impact.** The site is not adjacent to a state scenic highway. There are no protected trees, rock outcroppings, or historic buildings on the project site; therefore, the proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings.

c) **No Impact.** The proposed project would not substantially degrade the existing visual character of the site and its surroundings. The site is within an urbanized area with improved roadways, electrical poles and lines, streetlights, sidewalks, and ornamental landscaping (e.g., groundcover, shrubs and trees). The project site contains two existing industrial buildings that were built in 1977, which will remain. The site will not include the construction of additional buildings, although the site will be improved with the construction of new perimeter walls, landscaping and minor architectural improvements to the existing buildings. Therefore, the project would have a less than significant impact on the existing visual character and quality of the site and its surroundings.

d) **Less than Significant Impact.** The proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Street lights are located immediately north of the site along Opal Avenue and in adjacent residential areas. Street and exterior lighting proposed on site would be similar to the surrounding uses and would be hooded and down-shielded to direct lighting onsite and

protect surrounding properties from any light glare. Therefore, the project would result in less than significant impacts relative to light and glare.

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

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

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

a) **No Impact.** The Farmland Mapping and Monitoring Program of the California Department of Conservation is responsible with mapping Prime Farmland, Unique Farmland, Farmland of

Statewide Importance, and Farmland of Local Importance (Farmland) across the state. This site is designated as Urban/Built up land. The project would not convert Farmland, as shown on the FMMP maps, to non-agricultural use, since the project site is not designated as such.

b) **No Impact**. The proposed project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. The current General Plan land use designation for the project area is Single Residential. The proposed project area is not under a Williamson Act contract. There is no impact and no further analysis is warranted.

c) **No Impact**. The proposed project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. The proposed project area has never been designated as forest land or timberland because the site is within the valley region which does not contain forested lands.

d) **No Impact.** The proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. The proposed project site is within the valley region of the county, and is predominantly disturbed with existing industrial uses. There is no impact and no further analysis is warranted.

e) **No Impact.** The proposed project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use. The current General Plan land use designation for the project area is Single Residential. There is no impact and no further analysis is warranted.

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

	Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
III.	**AIR QUALITY** - Where available, the significance criteria established by the applicable air quality management or air pollution control district might be relied upon to make the following determinations. Will the project:				
a)	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b)	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☒	☐	☐
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)?	☐	☒	☐	☐
d)	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e)	Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

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

The following analysis is based on the project Air Quality Impact Analysis (AQIA) dated May 31, 2017 prepared by Urban Crossroads. The AQIA evaluates emissions from construction and operations, focusing on criteria air pollutants, hazardous emissions, and greenhouse gases (GHG).

a) **No Impact.** The 2016 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the district are provided to the Southern California Association of Governments (SCAG), which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in County of San Bernardino General Plan (County General Plan) is considered to be consistent with the AQMP.

- **Construction Impacts.** Peak day emissions generated by construction activities are largely independent of land use assignments, but rather are a function of development scope and maximum area of disturbance. Irrespective of the site's land use designation, development of the site to its maximum potential would likely occur, with disturbance of the entire site occurring during construction activities.
- **Operational Impacts.** The County currently designates the Project site as "Single Residential (RS)." The RS land use zoning district provides areas for single-family homes on individual lots, areas for accessory and non-residential uses that complement single residential neighborhoods. The Project is proposed to consist of 126,224 s.f. of

manufacturing and 115,329 s.f. of warehousing use within two currently vacant existing buildings, which is more intense than the existing RS land use designation. Though the Project proposes a more intense land use, it should be noted the Project would not exceed the applicable SCAQMD regional and localized significance thresholds. As such, the Project would not have the potential to conflict with the AQMP.

- **AQMP Consistency Conclusion.** The Project would not have the potential to cause NAAQS or CAAQS violations. Though the Project proposes land uses that are more intense than the existing land use designation, the Project would not exceed the applicable SCAQMD regional and localized significance thresholds. As such, the Project would not have the potential to conflict with the AQMP.

b) **Less than Significant with Mitigation Incorporated.** The proposed project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Air quality impacts would include construction exhaust emissions generated from diesel- and gasoline-powered equipment construction equipment, vegetation clearing, grading, construction worker commuting, construction material deliveries, and operational activities upon project completion. Fugitive dust emissions include particulate matter and are a potential concern because the project is in a non-attainment area for PM-10 and PM-2.5, as well as ozone.

Construction Phase

The SCAQMD Rules that are currently applicable during construction activity for this Project include but are not limited to: Rule 1113 (Architectural Coatings) (32); Rule 431.2 (Low Sulfur Fuel) (33); Rule 403 (Fugitive Dust) (34); and Rule 1186 / 1186.1 (Street Sweepers) (35). As such, credit for Rule 1113 and Rule 403 have been taken.

The estimated maximum daily construction emissions without mitigation are summarized on Table 3-4. Detailed construction model outputs are presented in Appendix 3.2. Under the assumed scenarios, emissions resulting from the Project construction would not exceed numerical thresholds established by the SCAQMD for any criteria pollutant. Therefore, a less than significant impact would occur and no mitigation is required.

Table 3-4: Construction Activity Emissions
Maximum Daily Emissions (pounds/day)

Maximal Construction Emissions	VOC	NOx	CO	SO_2	PM-10	PM-2.5
Peak Daily	72.93	76.30	69.27	0.19	2.78	4.76
SCAQMD Thresholds	75	100	550	150	150	55

Peak daily construction activity emissions are estimated to be below SCAQMD CEQA thresholds without the need for added mitigation. The only model-based mitigation measure applied for this project was watering exposed dirt surfaces at least three times per day as required per SCAQMD Rule 403 (Fugitive Dust), to minimize the generation of fugitive dust.

Based on the above analysis, project construction and operations would neither violate any air quality standard nor contribute substantially to an existing or projected air quality violation. Impacts are less than significant; nonetheless mitigation measures AQ-1 through AQ-3 are incorporated to facilitate monitoring and compliance with SCAQMD's Rule 403.

Operational Impacts

The estimated operation-source emissions are summarized on Table 3-5. Detailed operation model outputs are presented in Appendix 3.2. Under the assumed scenarios, emissions resulting from the Project operations would not exceed the numerical thresholds established by the SCAQMD for any criteria pollutant. Therefore, a less than significant impact would occur and no mitigation is required.

TABLE 3-5: SUMMARY OF OPERATIONAL EMISSIONS (1 OF 2)

Operational Activities – Summer Scenario	Emissions (pounds per day)					
	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Area Source	5.68	4.80E-04	0.05	0.00	1.80E-04	1.80E-04
Energy Source	0.13	1.18	0.99	7.09E-03	0.09	0.09
Mobile (Trucks)	1.62	47.30	11.82	0.14	4.78	1.60
Mobile (Passenger Cars)	1.42	2.01	28.02	0.08	8.94	2.40
Total Maximum Daily Emissions	8.85	50.49	40.88	0.23	13.81	4.09
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

TABLE 3-5: SUMMARY OF OPERATIONAL EMISSIONS (2 OF 2)

Operational Activities – Winter Scenario	Emissions (pounds per day)					
	VOC	NOx	CO	SO_x	PM_{10}	$PM_{2.5}$
Area Source	5.68	4.80E-04	0.05	0.00	1.80E-04	1.80E-04
Energy Source	0.13	1.18	0.99	7.09E-03	9.00E-02	9.00E-02
Mobile (Trucks)	1.66	48.40	12.34	0.14	4.78	1.60
Mobile (Passenger Cars)	1.17	2.10	22.64	0.08	8.94	2.40
Total Maximum Daily Emissions	8.64	51.68	36.02	0.23	13.81	4.09
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

The project would not cause any operational emissions to exceed their respective SCAQMD CEQA significance thresholds. Based on the modeling analysis, operational emission impacts are judged to be less than significant.

c) **Less than Significant with Mitigation Incorporated**. Although the County is in "severe non-attainment" for ozone and PM10, development of the project will not significantly contribute to this violation. As demonstrated in the Air Quality tables above, the subject development will not result in a cumulatively considerable net increase of any criteria pollutants. Nonetheless, in order to further reduce potential impacts to air quality, mitigation measures are set forth below.

d) **Less than Significant.** The potential impact of Project-generated air pollutant emissions at sensitive receptors has also been considered. Sensitive receptors can include uses such as long term health care facilities, rehabilitation centers, and retirement homes. Residences, schools, playgrounds, child care centers, and athletic facilities can also be considered as sensitive receptors.

Results of the LST analysis indicate that the Project will not exceed the SCAQMD localized significance thresholds during construction. Therefore sensitive receptors would not be exposed to substantial pollutant concentrations during Project construction.

Results of the LST analysis indicate that the Project will not exceed the SCAQMD localized significance thresholds during operational activity. Further Project traffic would not create or result in a CO "hotspot." Therefore sensitive receptors would not be exposed to substantial pollutant concentrations as the result of Project operations.

Potential Project-Related DPM Source Cancer and Non-Cancer Risks
Project-related DPM-source cancer and non-cancer risks for residential, worker, and school child exposure scenarios for the Project are considered herein and are summarized as follows.

- *Residential Exposure Scenario:* The residential land use with the greatest potential exposure to Project DPM source emissions is an existing residential home located adjacent to the east 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 1.12 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 0.0007, 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.
- *Worker Exposure Scenario:* 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 0.25 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.
- *School Child Exposure Scenario:* The school site land use with the greatest potential exposure to Project DPM source emissions is located at the Redlands East Valley High School which is located immediately south of the Project site. It should be noted that there may be other schools in the general vicinity of the Project, however, any impacts at other

schools would be less than what has been disclosed for the Redlands East Valley High School. At the maximally exposed individual school child (MEISC), the maximum incremental cancer risk impact at this location is 0.25 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 0.001 which would not exceed the applicable threshold of 1.0.

e) **Less than Significant.** Substantial odor-generating sources include land uses such as agricultural activities, feedlots, wastewater treatment facilities, landfills or various heavy industrial uses. The Project does not propose any such uses or activities that would result in potentially significant operational-source odor impacts. Potential sources of operational odors generated by the Project would include disposal of miscellaneous refuse. Moreover, SCAQMD Rule 402 acts to prevent occurrences of odor nuisances (1). Consistent with County requirements, all Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with solid waste regulations. Potential operational-source odor impacts are therefore considered less-than significant.

SIGNIFICANCE: Possible significant adverse impacts have been identified or are anticipated and the following mitigation measures are required as conditions of project approval to reduce these impacts to a level considered less than significant:

AIR QUALITY MITIGATION MEASURES:

AQ-1 *AQ/Operational Mitigation. The "developer" shall implement the following air quality mitigation 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) Engines shall be maintained in good working order to reduce emissions. Ultra low-sulfur diesel fuel shall be utilized.
e) Electric, CNG and gasoline-powered equipment shall be substituted for diesel-powered equipment, where feasible.
f) On-site electrical power connections shall be made available, where feasible.
g) All transportation refrigeration units (TRU's) shall be provided electric connections, when parked on-site.
h) 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.

[Mitigation Measure AQ-1] General Requirements/Planning

AQ-2 *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.

[Mitigation Measure AQ-2] Prior to Grading Permit/Planning

AQ-3 *AQ - Construction Mitigation. 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).

[Mitigation Measure AQ-3] Prior to Grading Permit/Planning

AQ-4 *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.

[Mitigation Measure AQ-4] Prior to Building Permit/Planning

AQ-5 *AQ – Installation. The developer will submit for review and obtain approval from County Planning evidence that all air quality mitigation measures have been installed properly and that specified performance objectives are being met to the satisfaction of County Planning and County Building and Safety.*
[Mitigation Measure AQ-5] Prior to Occupancy/Planning

	Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
IV.	**BIOLOGICAL RESOURCES** - Will the project:				
a)	Have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☒
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?	☐	☐	☐	☒
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan?	☐	☐	☐	☒

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

The following analysis is based on the project Biological Resources Study dated June, 2017, and the focused Burrowing Owl Survey Report dated September 6, 2017, prepared by Hernandez Environmental Services (HES).

a) **Less than Significant with Mitigation Incorporated.** The site currently developed with a 205,953 square foot industrial building with offices, and a 35,600 square foot warehouse building. The site also includes truck and passenger vehicle parking, fences, gates, hardscape areas, as well as some ornamental trees and vegetation. The uses surrounding the project site primarily consist of industrial uses to the west, a residential housing and water reservoir to the north, a residential tract to the east, and Redlands East Valley High School to the South. The photos below show the existing site conditions.

Implementation of the proposed project will involve the use of 25.3 acres of developed industrial buildings, associated pavements, and landscaping, and 13 acres of ruderal fields dominated by non-native plants.

Impacts to Sensitive Species

The Biological Resources Study indicates that the Coast Horned Lizard, the Burrowing Owl and the San Diego Black-Tailed Jackrabbit have the potential to be impacted by the proposed project.

Coast Horned lizard

Coast Horned Lizard (*Phrynosoma blainvillii)* is a CDFW Species of Special Concern. It is found in open areas for sunning, bushes for cover and patches of loose soil for burial. The non-native vegetation dominant fields on the north and east part of the project site may have habitat. Project activities have potential to impact this species. A biological monitor will be present during ground disturbing activities to avoid direct impacts to the coast horned lizard.

Burrowing Owl

Burrowing owl (*Athene cunicularia*) is a CDFW Species of Special Concern. The species lives in dry open areas with no trees and short grass. Project activities have potential to disturb this species. The "General Biological Assessment prepared for the project, determined that focused surveys for Burrowing Owl (BUOA) would be required due to recorded historic observations in the surrounding area and the presence of suitable habitat documented during the July 12, 2017 habitat assessment. In accordance with the survey, non-breeding surveys were conducted in accordance with the Staff Report on Burrowing Owl Mitigation by the State of California Natural Resources Agency, Department of Fish and Game. Surveys were conducted on four separate days: July 12, July 25, August 4, and August 30, 2017.

The HES report concluded that the project site provides suitable burrows/nesting opportunities for BUOW. A total of 30 burrows were checked and recorded. The majority of suitable burrows identified occur on concrete rock piles within the boundaries of the project site. Although the project site supports fossorial mammal burrows and concrete rock piles capable of supporting BUOW, no BUOW or BUOW sign was observed within or adjacent to the study area. The HES report is recommended that a preconstruction survey be conducted within 30 days prior to the start of any ground disturbing activities to avoid potential impacts to BUOW or other nesting birds, and to ensure that no BUOW have moved onto the project site since the completion of this survey.

San Diego Black-Tailed Jackrabbit

San Diego black-tailed jackrabbit is a CDFW Species of Special Concern. It is found in coastal sage scrub habitats in Southern California. The non-native vegetation dominant fields on the north and east part of the project site may have habitat. Project activities have potential to impact this species. A biological monitor will be present during ground disturbing activities to avoid direct impacts to the black-tailed jack rabbit.

Impacts to Nesting Birds

The project site contains landscaped areas and open ruderal fields that can be used by nesting song birds during the nesting bird season of February 1 to September 15. If project activities will remove vegetation or buildings during the nesting season, nesting birds have a potential to be impacted.

Removal of vegetation shall be conducted outside of the nesting season for migratory birds to avoid direct impacts. The migratory bird nesting season is between February 1 and September 15.

If vegetation removal will occur during the migratory bird nesting season, between February 1 and September 15, it is recommended that pre-construction nesting bird surveys be performed within three days prior to vegetation removal. If active nests are found during nesting bird surveys, they shall be flagged and a 200-foot buffer shall be fenced around the nests.

Front of small warehouse building from Opal Ave.

Front of main warehouse building from Opal Ave.

Parking and storage area from Opal Ave.

Undeveloped northerly area of site adjacent to Nice Ave.

Looking west across undeveloped portion of site.

b) **No Impact.** The site does not contain any riparian habitat. Vegetation on the site consists of predominantly ornamental vegetation. Neither desert plant species nor riparian plant species exist or have the potential to exist on the project site. There is no impact to riparian habitat.

c) **No Impact.** No waters and/or wetlands under the jurisdiction of the federal government, through the U.S. Army Corps of Engineers (USACE) were identified on the site. The project would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act, and no mitigation measures are required. There is no impact to federally protected wetlands.

d) **Less than Significant.** The site does not have native wildlife species and the likelihood for such species to breed on the site is extremely low. No native wildlife nurseries or breeding colonies exist on the site. No naturally occurring native fish populations are present within the project site because the project site has no standing water or significant hydrological drainages where water would be present for an extended period of time.

e) **Less than Significant.** The project does not conflict with local policies or ordinances protecting biological resources that are applicable to the proposed project site. The project site is currently developed as an industrial use, and was long ago cleared of native vegetation. The project site contains approximately 13 acres of areas described as ruderal. These are mostly composed of disturbed vacant fields dominated by non-native herbaceous plant species. Common plant species observed in the habitat type include: slim oat (*Avena barbata*), black mustard (*Brassica nigra*), ripgut brome (*Bromus diandrus*), foxtail brome (*Bromus madritensis* ssp. *Rubens*), goosefoot (*Chenopodium murale*), Jimson weed (*Datura stramonium*), mustard (*Hirschfeldia incana*), Russian thistle (*Salsola tragus*) and schismus (Schismus barbatus).

f) **No Impact.** The project site is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. The project would have no significant impact relating to Habitat Conservation Plans, Natural Community Conservation Plans, and Recovery Plans. There would be no take of critical habitat and, therefore, no land use conflict with existing management plans would occur.

Significance: Possible significant adverse impacts have been identified or are anticipated and the following mitigation measures are required as conditions of project approval to reduce these impacts to a level considered less than significant:

BIOLOGICAL RESOURCES MITIGATION MEASURES:

BIO-1 *Nesting Bird Mitigation – Pre-Construction Surveys. Removal of vegetation shall be conducted outside of the nesting season for migratory birds to avoid direct impacts. The migratory bird nesting season is between February 1 and September 15. Within 3 days prior to vegetation clearing or ground disturbance associated with construction or grading that would occur during the nesting/breeding season (February 1 through September 15), the Applicant shall retain a qualified biologist to determine if active nests of species protected by*

the Migratory Bird Treaty Act or the California Fish and Game Code are present within or adjacent to the disturbance zone or within 100 feet (300 feet for raptors) of the disturbance zone. The surveys will be conducted no more than three days prior to initiation of disturbance work within active project areas. If ground disturbance activities are delayed, then additional pre-disturbance surveys will be conducted such that no more than three days will have elapsed between the survey and ground disturbance activities. If ground disturbance will be phased across the project site, pre-disturbance surveys may also be phased to conform to the development schedule.

If active nests are found, clearing and construction within 200 feet of the nest (or a lesser distance if approved by the U.S. Fish & Wildlife Service) will be postponed or halted, until the nest is vacated and juveniles have fledged, as determined by the biologist. Avoidance buffers will be established in the field with highly visible construction fencing or flagging, and construction personnel will be instructed on the sensitivity of nest areas. A qualified biologist will serve as a construction monitor during those periods when construction activities will occur near active nests to ensure that no inadvertent impacts on these nests occur.

The results of pre-construction nesting bird surveys, including graphics showing the locations of any nests detected, and documentation of any avoidance measures taken, will be submitted to the County of San Bernardino and the California Department of Fish & Wildlife within 14 days of completion of the pre-construction surveys or construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds. [Mitigation Measure BIO-1] Prior to Land Disturbance or Grading Permit/Planning

BIO-2 *Burrowing Owl Mitigation – Pre-Construction Surveys. Within 30 days prior to ground disturbance, the Applicant shall retain a qualified biologist to conduct burrowing owl surveys within the area to be disturbed. The survey will be performed by walking parallel transects spaced no more than 20 meters apart, and will be focused on detecting burrows that are occupied, or are suitable for occupation, by the burrowing owl. The results of the surveys, including graphics showing the locations of any active burrows detected and any avoidance measures required, will be submitted to the County of San Bernardino and the California Department of Fish & Wildlife (CDFW) within 14 days following completion of the surveys. If active burrows are detected, the following take avoidance measures will be implemented:*

a) If burrowing owls are observed using burrows on-site during the non-breeding season (September through January, unless determined otherwise by a qualified biologist based on field observations in the region), occupied burrows will be left undisturbed, and no construction activity will take place within 300 feet of the burrow where feasible (see below).

b) If avoiding disturbance of owls and owl burrows on-site is infeasible, owls will be excluded from all active burrows through the use of exclusion devices placed in occupied burrows in accordance with protocols established in CDFW's Staff Report on Burrowing Owl Mitigation (2012). Specifically, exclusion devices, utilizing one-way doors, will be installed in the entrance of all active burrows. The devices will be left in the burrows for at least 48 hours to ensure that all owls have been excluded from the burrows. Each of the burrows will then be excavated by hand and/or mechanically and

refilled to prevent reoccupation. Exclusion will continue until the owls have been successfully excluded from the disturbance area, as determined by a qualified biologist.

c) Any active burrowing owl burrows detected on-site during the breeding season (February through August, unless determined otherwise by a qualified biologist based on field observations in the region), will not be disturbed. Construction activities will not be conducted within 300 feet of an active on-site burrow at this season.

[Mitigation Measure BIO-2] Prior to Land Disturbance or Grading Permit/Planning

BIO-3 *Burrowing Owl Mitigation – Management Plan. If burrowing owl are determined to occupy the project site, prior to issuance of a grading permit, a habitat management plan for the burrowing owl will be developed. The plan will include provisions for protecting foraging habitat and replacing any active burrows from which owls may be passively evicted as allowed by Mitigation Measure BIO-2. The Burrowing Owl Management Plan will be submitted to the County of San Bernardino and the California Department of Fish and Wildlife for review and approval prior to issuance of a grading permit for the Project. At a minimum, the plan will include the following elements:*

a) If occupied burrows are to be removed, the plan will contain schematic diagrams of artificial burrow designs and a map of potential artificial burrow locations that would compensate for the burrows removed.

b) All active on-site burrows excavated as described in Mitigation Measure BIO-2 will be replaced with suitable natural or artificial burrows within the preservation areas approved by the County of San Bernardino.

c) Measures prohibiting the use of rodenticides during the construction process if any active on-site burrows are identified.

d) The plan will ensure that adequate suitable burrowing owl foraging habitat is provided in proximity to natural or artificial burrows within off-site mitigation areas.

[Mitigation Measure BIO-3] – Prior to Land Disturbance or Grading Permit/Planning

BIO-4 *Coast Horned Lizard and Black-tailed Jack Rabbit Mitigation – Management Plan. A biological monitor shall be present during ground disturbing activities to avoid direct impacts to coast horned lizard and black-tailed jack rabbit.*

[Mitigation Measure BIO-4] – Prior to Land Disturbance or Grading Permit/Planning

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

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

The proposed project is not located in a Cultural or Paleontological Resources Overlay area. The analysis in this section is based on the Cultural Resources Assessment, dated July 2014 and prepared by LSA & Associates.

a) **Less than Significant.** There are no known historic resources on the project site. The Cultural field survey conducted on the project site identified no historic-period resources. Therefore, development of the subject property is not expected to result in any adverse impacts to historical or archaeological resources.

b) **Less than Significant**. There were no archaeological resources discovered on the project site. A standard condition of approval would be applied to the project that requires the applicant or assignee to contact the County Museum for a determination of appropriate measures if any archeological resources are discovered during project construction. This condition would reduce the project's impacts to a level considered less than significant.

c) **Less than Significant**. This project is not expected to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, because no resources of significance have been identified in the cultural resources survey of the site. The standard condition of approval mentioned above in V.b) would further reduce the potential for impacts, if anything should be found during project construction.

d) **Less than Significant.** It is not anticipated that this project would disturb any human remains, including those interred outside of formal cemeteries, because no such burials grounds are known to exist on the project site. If any human remains are discovered during construction of this project, standard requirements in the Conditions of Approval would require the developer to contact the County Coroner and the County Museum for a determination of appropriate measures to be taken. A Native American representative shall also be consulted

if the remains are determined to be of potential Native American origin pursuant to Section 15064.5(e) of the CEQA Guidelines.

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

Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
VI. GEOLOGY AND SOILS - Will the project:				
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? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 181-B of the California Building Code (2001) creating substantial risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

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

The following analysis is based on the project Report of Limited Geotechnical Study dated June 6, 2017 prepared by Hilltop Geotechnical, Inc.

a) i) **Less than Significant.** The proposed project site is not located within an Alquist-Priolo Earthquake Fault Zone. While the potential for onsite ground rupture cannot be totally discounted (e.g., unmapped faults could conceivably underlie the project site), the likelihood of such an occurrence is considered low due to the absence of known faults within the site. There is no impact related to the exposure of persons or structures to rupture of a known earthquake fault.

ii) **Less than Significant.** The project site is within a seismically active region and is potentially subject to strong ground acceleration from earthquake events along major regional faults in southern California. The nearest identified fault line to the project site is the Redlands Fault which is capable of generating seismic activity. The known regional active and potentially active faults that could produce the most significant ground shaking at the site include the Redlands-Elsinore fault zone, San Jose, Cucamonga, Sierra Madre, Puente Hills, San Jacinto, and San Andreas faults.

The design of any structures on-site would incorporate measures to accommodate projected seismic loading, pursuant to existing California Building Code (CBC) and local building regulations. Specific measures that may be used for the proposed project include proper fill composition and compaction; anchoring (or other means of for securing applicable structures); and the use of appropriate Opal materials, dimensions, and flexible joints. Based on the incorporation of applicable measures into project design and construction to comply with CBC, potential project impacts associated with strong seismic ground shaking would be less than significant.

iii) **Less than Significant.** Liquefaction is the phenomenon whereby soils lose shear strength and exhibit fluid-like flow behavior. The project site is not located in a Geologic Hazard Overlay, nor is it located on soils known to expose people or structures to liquefaction.

iv) **No Impact.** The proposed project would not have any risks associated with landslides. Landslides are the downslope movement of geologic materials. The stability of slopes is related to a variety of factors, including the slope's steepness, the strength of geologic materials, and the characteristics of bedding planes, joints, faults, vegetation, surface water, and groundwater conditions. The project area is relatively flat terrain where landslides have not historically been an issue; therefore, no significant impacts are anticipated with respect to seismic-related (or other) landslide hazards, and no further analysis is warranted.

b) **Less than Significant.** Construction activities could result in substantial soil erosion if the sites are not properly designed. The potential impacts of soil erosion would be minimized through implementation of Development Code requirements. Specifically, the applicant would prepare a Stormwater Pollution Prevention Plan (SWPPP) in compliance with the requirements of the National Pollutant Discharge Elimination System (NPDES) General Construction Permit. The SWPPP would prescribe temporary Best Management Practices (BMPs) to control wind and water erosion during and shortly after construction of the project. A preliminary Water Quality Management Plan has been prepared, which specifies permanent BMPs to control erosion and sedimentation once construction is complete. A final WQMP is required prior to building permits, which will affirm the proposed BMPs on the construction plans. The impact on soil erosion is less than significant and no further analysis is warranted.

c) **Less than Significant.** The site is not expected to be prone to adverse effects of slope instability or adverse differential settlement from cut/fill transition.

During construction, the geotechnical engineer would provide on-site observation of site preparation and grading, fill placement and foundation installation, thus ensuring that geotechnical conditions are as anticipated and that the contractor's work meets with the criteria in the approved plans and specifications. Any underground obstructions should be removed, as should large trees and their root systems. Resulting cavities should be properly backfilled and compacted. Efforts should be made to locate existing utility lines. Those lines should be removed or rerouted if they interfere with the proposed construction, and the resulting cavities should be properly backfilled and compacted.

d) **Less than Significant**. Expansive (or shrink-swell) behavior is attributable to the water-holding capacity of clay minerals and can adversely affect the structural integrity of facilities. In general, compliance with Building Code requirements would minimize potential impacts to project facilities. Site soils are determined by the Geotechnical Investigation to be typically stiff or medium dense, are deemed to be low expansive potential. Prior to placing any fills or constructing any overlying improvements, loose surface soils would be scarified and compacted according to Geotechnical Investigation specifications. Impacts would be less than significant and no further analysis is warranted.

e) **No Impact.** The project does not propose to use septic tanks or alternative wastewater disposal systems; therefore, no impacts would occur. No further analysis is warranted.

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

	Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
VII	**GREENHOUSE GAS EMISSIONS** - Will the project:				
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b)	Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

SUBSTANTIATION:

a) **Less than Significant.** The County's Greenhouse Gas Emissions Reduction Plan (GHG Plan) was adopted on December 6, 2011 and became effective on January 6, 2012. The GHG Plan establishes a GHG emissions reduction target for the year 2020 that is 15 percent below 2007 emissions. The plan is consistent with AB 32 and sets the County on a path to achieve more substantial long-term reductions in the post-2020 period. Achieving this level of emissions will ensure that the contribution to greenhouse gas emissions from activities covered by the GHG Plan will not be cumulatively considerable.

In 2007, the California State Legislature adopted Senate Bill 97 (SB97) requiring that the CEQA Guidelines be amended to include provisions addressing the effects and mitigation of GHG emissions. New CEQA Guidelines have been adopted that require: inclusion of a GHG analyses in CEQA documents; quantification of GHG emissions; a determination of significance for GHG emissions; and, adoption of feasible mitigation to address significant impacts. The CEQA Guidelines [Cal. Code of Regulations Section 15083.5 (b)] also provide that the environmental analysis of specific projects may be tiered from a programmatic GHG plan that substantially lessens the cumulative effect of GHG emissions. If a public agency adopts such a programmatic GHG Plan, the environmental review of subsequent projects may be streamlined. A project's incremental contribution of GHG emissions will not be considered cumulatively significant if the project is consistent with the adopted GHG plan.

Implementation of the County's GHG Plan is achieved through the Development Review Process by applying appropriate reduction requirements to projects, which reduce GHG emissions. All new development is required to quantify the project's GHG emissions and adopt feasible mitigation to reduce project emissions below a level of significance. A review standard of 3,000 metric tons of carbon dioxide equivalent (MTCO2e) per year is used to identify and mitigate project emissions. Based on a CalEEMod statistical analysis, warehouse projects that exceed 53,000 square feet typically generate more than 3,000 MTCO2e. For projects exceeding 3,000 MTCO2e per year of GHG emissions, the developer may use the GHG Plan Screening Tables as a tool to assist with calculating GHG reduction measures and the determination of a significance finding. Projects that garner 100 or more points in the Screening Tables do not require quantification of project-specific 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, will allow the County to meet its 2020 target and support longer-term reductions in GHG emissions beyond 2020. Consistent with the CEQA Guidelines, such projects are consistent with the Plan and therefore will be determined to have a less than significant individual and cumulative impact for GHG emissions.

The proposed project garnered 103 points on the Screening Tables through the application of Energy Efficient Reduction measures, Renewable Fuel/Low Emissions Vehicles Measures, and Per Capita Water use Reductions, and as a result, the project is considered to be 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 developer through the Screening Tables Review Process have been included in the project design or will be included as Conditions of Approval for the project.

b) **Less than Significant.** 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. In January of 2012, the County of San Bernardino adopted a Greenhouse Gas Emissions Reduction Plan (GHG Plan). The proposed project is consistent with the GHG Plan because more than 100 points were garnered through the Screening Table Analysis as described in Section a) above.

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

	Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
VIII	**HAZARDS AND HAZARDOUS MATERIALS** - Will the project:				
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, will it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, will the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f)	For a project within the vicinity of a private airstrip, will the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
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?	☐	☐	☐	☒

SUBSTANTIATION:

a) **Less than Significant.** The project will not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, because no use approved on the site is anticipated to be involved in such activities.

The intended use of the proposed project is general manufacturing warehousing of non-hazardous materials. Prior to occupancy of the site, the applicant is required to submit a Business Emergency/Contingency Plan for emergency release or threatened release of

hazardous materials and waste or a letter of exemption to the Hazardous Materials Division of County Fire. If such uses are proposed on-site in the future, they will be subject to permit and inspection by the Hazardous Materials Division of the County Fire Department and in some instances additional land use review.

b) **Less than Significant.** The project will not 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, because 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.

c) **Less than Significant.** Prior to occupancy of the site, the applicant is required to submit a Business Emergency/Contingency Plan for emergency release or threatened release of hazardous materials and waste or a letter of exemption to the Hazardous Materials Division of County Fire. If such uses are proposed on-site in the future, the applicant will be subject to permit and inspection by the Hazardous Materials Division of the County Fire Department and in some instances additional land use review.

d) **Less than Significant.** The project site is not located on a known site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The proposed project shall not create a significant hazard to the public or the environment. No impacts to this topic shall occur as a result of implementing the proposed project and, therefore, no mitigation measures are required.

e) **No Impact.** The proposed project area is located in the vicinity of the Redlands Municipal Airport. The site is not within the boundaries of the airport land use plan and would not impose safety hazards for people working in the project area as a result of proximity to an airport.

f) **No Impact.** The proposed project area is not located within the vicinity of a private airstrip; therefore, it would not result in a safety hazard for people residing or working in the project area.

g) **No Impact.** Activities associated with the proposed project would not impede existing emergency response plans for the project site and/or other land uses in the project vicinity. The project would not result in any closures of existing roadways that might have an effect on emergency response or evacuation plans in the vicinity of the project site. In addition, all vehicles and stationary equipment would be staged off public roads and would not block emergency access routes. Accordingly, implementation of the proposed project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. There is no impact and no further analysis is warranted.

h) **No Impact.** The project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires, because there are no wildlands adjacent to this site. The project site is in an urban area and is not located in or adjacent to wildlands or near the wildlands/urban interface. Therefore, people and infrastructure will not be exposed to wildland fires.

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

	Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
IX	**HYDROLOGY AND WATER QUALITY** - Will the project:				
a)	Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b)	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there will 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 will not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐
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 will result in substantial erosion or siltation on- or offsite?	☐	☐	☒	☐
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 which will result in flooding on- or offsite?	☐	☐	☒	☐
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?	☐	☐	☒	☐
f)	Otherwise substantially degrade water quality?	☐	☐	☒	☐
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?	☐	☐	☐	☒
h)	Place within a 100-year flood hazard area structure which would impede or redirect flood flows?	☐	☐	☐	☒
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?	☐	☐	☐	☒
j)	Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

SUBSTANTIATION:

a) **Less than Significant.** The project would not violate any water quality standards or waste discharge requirements, because a final WQMP would be required to be prepared and approved by the Land Development Division as part of the building permit(s) process.

b) **Less than Significant.** The project would not 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. Groundwater infiltration will still occur as discussed in section IX. a) above. Potable water would be provided by the City of Redlands not from groundwater wells at the site. The City of Redlands currently serves the existing structures located on the project site.

c) **Less than Significant.** The project would not substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site. The project does not propose any substantial alteration to a drainage pattern. Drainage will continue to leave the site on Opal Avenue. The proposed development will decrease all flow events from their pre-development conditions for flow and volume. 100 year flows will be reduced by 30 percent and 100 year volume will be reduced by 16.68 percent There is no stream or river on the site or in the vicinity that would be affected by construction of the project. The project is required to submit and implement an erosion control plan, and construction would be subject to a Storm Water Pollution Protection Plan (SWPPP) to prevent erosion or sedimentation during project construction.

d) **Less than Significant.** As described in c.), above, the project would not impact any drainages, and the project would not otherwise result in any noteworthy change in the drainage pattern of the site or area. As shown on the hydrology plan, the project would not result in a substantial alteration to the drainage pattern of the site or area, nor would it result in any substantial increase in runoff that could cause flooding on-or off-site. The site is currently relatively flat and would remain flat after construction is completed.

e) **Less than Significant.** Refer to response IX. a) above. 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, because County has reviewed the proposed project Post-Developed Hydrology Map and has determined that the proposed on-site storm water retention systems are adequate to handle the anticipated flows. All necessary drainage improvements both on and off site would be required as conditions of the construction of the project, and would be subject to the same dust control measures, Best Management Practices for water quality and other standards and requirements that apply to on-site construction. 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. Less than significant impacts would result and no further analysis is warranted.

f) **Less than Significant.** Refer responses to IX. a) – e). The proposed project would not otherwise substantially degrade water quality because appropriate measures relating to water quality protection, including erosion control measures have been required. No further analysis is warranted.

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, because the subject property is not mapped as occurring within that flood hazard zone. No further analysis is warranted.

h) **No Impact.** The project would not place structures within a 100-year flood hazard area which would impede or redirect flood flows, because the site is not located within a 100-year flood hazard area and any area identified as being potentially affected by a 100-year storm. The structures would be subject to a flood hazard review and would be required to be elevated a minimum of one foot above the base flood elevation.

i) **No Impact.** 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, because the project site is not within any identified path of a potential inundation flow that might result in the event of a dam or levee failure or that might occur from a river, stream, lake or sheet flow situation. There is no impact and no further analysis is warranted.

j) **No Impact.** The project site would not be subject to inundation by seiche, tsunami, or mudflow. A tsunami is a series of ocean waves generated in the ocean by an impulsive disturbance. Due to the inland location of the proposed project, tsunamis are not considered a threat. A seiche is an oscillating surface wave in a restricted or enclosed body of water generated by ground motion, usually during an earthquake. Inundation from a seiche can occur if the wave overflows a containment wall or the banks of a water body. No impacts are expected to occur because the project is not adjacent to any marine or inland water bodies. The soils in the project area are well-drained, the terrain is relatively flat, and mudflows have not historically been an issue in the proposed project area. No further analysis is warranted.

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

	Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
X.	**LAND USE AND PLANNING** - Will the project:				
a)	Physically divide an established community?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c)	Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

SUBSTANTIATION:

a) **Less Than Significant.** The proposed project would not physically divide an established community, because the property is already developed with two existing industrial buildings. Until recently, the project site has been operated by a manufacturing use since the late 1970's. Also, much of the adjacent surrounding property to the west and north is already developed with industrial warehouse buildings and other commercial uses, so the proposed land use district amendment to Community Industrial (IC) is consistent with the established land uses in the surrounding area.

b) **Less Than Significant.** The project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect, because project approval includes a General Plan Amendment to change the site's Land Use District to Community Industrial. The project would be consistent with all applicable land use policies and regulations of the County Development Code and General Plan.

c) **No Impact.** The proposed project does not conflict with any applicable habitat conservation plans or natural community conservation plans. No such plan exists in the area.

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

Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
XI. MINERAL RESOURCES - Will the project:				
a) Result in the loss of availability of a known mineral resource that will be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

SUBSTANTIATION: *(Check ☐ if project is located within the Mineral Resource Zone Overlay):*

a) **No Impact.** The project would not result in the loss of availability of a known mineral resource that will be of value to the region and the residents of the state, because there are no identified important mineral resources on the project site and the site is not within a Mineral Resource Zone Overlay. No further analysis is warranted.

b) **No Impact.** The proposed project would not 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 (see discussion in Item XI.a). There is no impact and no further analysis is warranted.

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

Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
XII. NOISE - Will the project result in:				
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?	☐	☒	☐	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
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, will the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, will the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

SUBSTANTIATION: *(Check if the project is located in the Noise Hazard Overlay District ☐ or is subject to severe noise levels according to the General Plan Noise Element ☐):*

A Noise Impact Analysis was prepared for this project by Urban Crossroads dated May 31, 2017, which serves as the bases for the analysis below

a) **Less than Significant with Mitigation Incorporated.** The project Noise Impact Analysis presents a summary of the combined total Project-only operational noise level projections at the nearby sensitive receiver locations for a comparison local jurisdiction exterior noise level standards. The Project operational noise levels at the nearby sensitive receiver locations are shown to range from 42.1 to 60.3 dBA Leq, 37.9 to 53.0 dBA L_{50}, 42.3 to 61.8 dBA L_{25}, 46.3 to 65.4 dBA L8, 49.6 to 68.1 dBA L2, and 53.8 to 70.6 dBA Lmax. Based on the results of this analysis, the operational noise levels associated with the Project will exceed the County of San Bernardino Development Code daytime exterior noise level standards at the existing residential house located near the corner of Opal Ave. and Nice Avenue. The Project operational noise levels at all other receiver locations are shown to satisfy the County of San Bernardino Development Code daytime exterior noise level standards. The operational noise level calculations are included in Noise Impact Analysis (Appendix 9.2.) demonstrates compliance with the County of San Bernardino's criteria for residential development. In

addition, this analysis provides specific noise mitigation measures to ensure that the noise levels comply with the required County standards.

b) **Less than Significant with Mitigation Incorporated**. Groundborne vibration and groundborne noise could originate from earth movement during the construction phase of the proposed project. Construction activities may result in short term impacts to the noise environment including groundbourne vibration and noise. The impacts at the site of the closest sensitive receivers are unlikely to be sustained during the entire construction period, but will occur rather only during the times that heavy construction equipment is operating adjacent to the Project site perimeter. Construction at the Project site will be restricted to daytime hours consistent with County requirements thereby eliminating potential vibration impact during the sensitive nighttime hours. At buildout the project is not expected to generate groundbourne vibration or noise that is excessive. Short-term impacts associated with construction would be limited to the greatest extent practicable with the implementation of the mitigation measures outlined below.

c) **Less than Significant with Mitigation Incorporated.** The noise impact analysis demonstrates that the Project will not contribute a long-term operational noise level impact to the existing ambient noise environment at any of the sensitive receiver locations. Therefore, the operational noise level impacts associated with the proposed 24-hour seven days per week Project activities, such as the idling trucks, delivery truck activities, backup alarms, as well as loading and unloading of dry goods, parking lot vehicle movements, roof-top air conditioning units, and outdoor storage activities for finished products, are considered less than significant with mitigation incorporated.

d) **Less than Significant**. Construction noise represents a short-term increase on the ambient noise levels. Construction-related noise impacts are expected to create temporary and intermittent high-level noise conditions at receivers surrounding the Project site. Using sample reference noise levels to represent the planned construction activities of the Project site, this analysis estimates the Project-related construction noise levels at nearby sensitive receiver locations. The Project related short-term construction noise levels are expected to approach 80.7 dBA Leq and will satisfy the 85 dBA Leq threshold identified by the National Institute for Occupational Safety and Health (NIOSH) at all receiver locations. Therefore, based on the results of this analysis, all nearby sensitive receiver locations will experience *less than significant* impacts due to Project construction noise levels.

e) **No Impact.** The proposed project area is located within the boundaries of an airport land use plan, and is in the vicinity of the Redlands Municipal, located approximately 1.5 miles to the north. The project is outside of the adopted noise contours as the airport runway runs in an east –west direction.

f) **No Impact.** The proposed project area is not located within the vicinity of a private airstrip.

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

NOISE MITIGATION MEASURES:

N-1 *Noise Study. If at the time a tenant is identified for the Project site, a tenant-specific noise study shall be required for any special noise generators or equipment which are not already included in this analysis: idling trucks, delivery truck activities, backup alarms, as well as loading and unloading of dry goods, parking lot vehicle movements, roof-top air conditioning units, and outdoor storage activities for finished products. [Mitigation Measure N-1] Prior to Final Occupancy/Planning*

N-2 *Noise Buffer Zone. A 75-foot buffer zone shall be enforced at the Project site, as shown on the site plan, in which the following activities shall not be allowed within 75 feet of the eastern property line of the residential home in the northwestern portion of the Project site:*

- *Truck activity of any kind, including the pick-up or drop-off of finished products or storage materials, the use of back-up alarms, idling, and parking*
- *Back-up alarms for any alternative transport methods used to store finished products or materials within the buffer zone.*

[Mitigation Measure N-2] – General Requirement/Planning

N-3 *Equipment Maintenance. All on-site operating equipment under the control of the building user that is used in outdoor areas (including but not limited to trucks, tractors, forklifts, and hostlers), shall be operated with properly functioning and well-maintained mufflers.*
[Mitigation Measure N-3] – General Requirement/Planning

N-4 *Operational Signage. The truck access gates and loading docks within the truck court on the Project site shall be posted with signs which state:*

- *Truck drivers shall turn off engines when not in use;*
- *Diesel trucks servicing the Project shall not idle for more than five (5) minutes; and*
- *Telephone numbers of the building facilities manager and the California Air Resources*
- *Board (CARB) to report violations.*
- *[Mitigation Measure N-4] – General Requirement/Planning*

N-5 *Temporary Noise Control Barrier. Install minimum 10-foot high temporary construction noise barriers at the Project's western site boundaries adjacent to sensitive receivers on Opal Avenue for the duration of Project construction. Prior to issuance of Grading or Building permits, the applicant shall submit a Temporary Noise Control Plan that is subject to review and approval by County Planning and Building and Safety. The noise control barriers must have a solid face from top to bottom. The noise control barriers must meet the minimum height and shall be constructed as follows:*

- *The temporary noise barriers shall provide a minimum transmission loss of 20 dBA (Federal Highway Administration, Noise Barrier Design Handbook). The noise barrier shall be*

constructed using an acoustical blanket (e.g. vinyl acoustic curtains or quilted blankets) attached to the construction site perimeter fence or equivalent temporary fence posts;

- *The noise barrier must be maintained and any damage promptly repaired. Gaps, holes, or weaknesses in the barrier or openings between the barrier and the ground shall be promptly repaired;*
- *The noise control barrier and associated elements shall be completely removed and the site appropriately restored upon the conclusion of the construction activity.*

[Mitigation Measure N-5] – Prior to Grading and/or building Permit/Planning

N-6 *Construction Noise Measures. The developer shall comply with the following noise mitigation measures for the duration of Project construction. Prior to approval of grading and/or building permits, the applicant shall include the following noise reduction mitigation measures on all construction documents:*

- *The use of dozers shall be prohibited within 150 feet of the two nearby occupied sensitive residential homes on Opal Avenue.*
- *Prior to approval of grading plans and/or issuance of building permits, plans shall include a note indicating that noise-generating Project construction activities shall only occur between the hours of 7:00 a.m. to 7:00 p.m.; with no activity on Sundays and Federal holidays (Section 83.01.080(g)(3) of the County of San Bernardino Development Code).*
- *During all Project site construction, the construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards. 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.*
- *The construction contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receivers nearest the Project site (i.e., to the center) during all Project construction.*
- *The construction contractor shall limit haul truck deliveries to the same hours specified for construction equipment (between the hours of 7:00 a.m. to 7:00 p.m.; with no activity on Sundays and Federal holidays). The contractor shall design delivery routes to minimize the exposure of sensitive land uses or residential dwellings to delivery truck-related noise, consistent with County of San Bernardino General Plan Noise Element, Policy N 1.5.*

[Mitigation Measure N-6] – Prior to Grading and/or Building Permit/Planning

	Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
XIII.	**POPULATION AND HOUSING** - Will the project:				
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)?	☐	☐	☒	☐
b)	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c)	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

SUBSTANTIATION:

a) **Less than Significant.** The proposed project is not expected to induce substantial population growth in the area, either directly or indirectly, because the project only proposes 131 lots.

Growth induced by a project could be considered a significant impact if it directly or indirectly affects the ability of public agencies to provide services. Public services for this project would be provided by a number of public agencies, including the County of San Bernardino and the City of Redlands. No service provider has indicated inability to serve the project. Therefore, the population growth associated with the proposed project is less than significant. The project would not result in a substantial adverse effect related to substantial population growth in the area, and no mitigation measures are required.

b) **No Impact.** The proposed project would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere because the project site contains no existing housing that will be removed.

c) **No Impact.** The proposed project would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere because the project site is currently not developed with any homes that will be demolished. No significant adverse impacts are anticipated and, therefore, no mitigation measures are required.

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

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

SUBSTANTIATION:

Due to the project site being located within an urbanized/developed area, a full range of urban public services is available to serve the project site.

a) **Less than Significant.** The proposed project would not 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, including fire and police protection, schools, parks or other public facilities. Construction of the project would increase property tax revenues to provide a source of funding that is sufficient to offset any increases in the anticipated demands for public services generated by this project.

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

Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
XV. RECREATION				
a) Will the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility will occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

SUBSTANTIATION:

a) **Less than Significant.** This project will not 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, because the project will not generate any new residential units and the impacts to parks generated by the employees of this project will be minimal.

b) **Less than Significant.** This project does not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment, because the type of project proposed will not result in an increased demand for recreational facilities.

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

	Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
XVI.	**TRANSPORTATION/TRAFFIC** – Will the project:				
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 greenways, pedestrian and bicycle paths, and mass transit.	☐	☐	☒	☐
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.	☐	☒	☐	☐
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?	☐	☐	☐	☒
d)	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e)	Result in inadequate emergency access?	☐	☐	☒	☐
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?	☐	☐	☒	☐

SUBSTANTIATION:

The following analysis is based on the project Traffic Impact Analysis, dated May 26, 2017 prepared by Urban Crossroads.

a) **Less than Significant.** The three roadways adjacent to the project site are fully improved to County standards. Two new driveways, providing direct access to Nice Avenue, will be constructed. No additional street improvements are proposed or required and no impacts to circulation or emergency vehicles is anticipated.

This project falls within the Regional Transportation Development Mitigation Fee Plan for the Redlands Subarea. The Plan fees shall be computed in accordance with the Plan fees in effect as of the date that the building plans are submitted and the building permit is applied for.

b) **Less than Significant with mitigation incorporated.** For the purposes of this traffic study, potential impacts to traffic and circulation have been assessed for each of the following conditions:

- Existing traffic conditions (2017);
- Existing plus Project (E+P);
- Opening year Cumulative (2018) without Project;
- Opening year Cumulative (2018) with Project;
- Horizon Year (2040) without Project;
- Horizon Year (2040) with Project.

The proposed Project is anticipated to generate a net total of 1,150 passenger car equivalent (PCE) trips-ends per day with 162 PCE AM peak hour trips and 165 PCE PM peak hour trips. In comparison, the proposed Project is anticipated to generate a net total of 893 actual vehicle trip-ends per day with 127 AM peak hour trips and 129 PM peak hour trips.

The study area intersections are currently operating at an acceptable LOS during the peak hours under Existing (2017) traffic conditions, with the exception of Judson Street at Colton Avenue. The intersection analysis results indicate that the study area intersections are anticipated to continue to operate at acceptable LOS during the peak hours, with the exception of the intersection of Judson Street and Colton Avenue, consistent with Existing traffic conditions. The addition of Project traffic at the intersection of Judson Street at Colton Avenue is anticipated to result in a significant cumulative impact as it contributes to the existing deficiency.

The intersection of Dearborn Street at Colton Avenue is anticipated to operate at an unacceptable LOS during the peak hours under Opening Year Cumulative (2018) Without Project traffic conditions, in addition to those previously identified under Existing traffic conditions. 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. However, the addition of Project traffic at the intersections of Judson Street at Colton Avenue and Dearborn Street at Colton Avenue is anticipated to result in a significant cumulative impact at both locations.

The following additional study area intersections are anticipated to operate at an unacceptable LOS during the peak hours under Horizon Year (2040) Without Project conditions, in addition to those previously identified under Opening Year Cumulative (2018) Without Project traffic conditions:

- Wabash Avenue / Colton Avenue – LOS F AM and PM peak hours
- Opal Avenue / Mentone Boulevard (SR-38) – LOS F AM and PM peak hours

- Opal Avenue / Colton Avenue – LOS F AM peak hour only

The intersection analysis results indicate that the addition of Project traffic is not anticipated to result in any additional LOS deficiencies under Horizon Year (2040) With Project traffic conditions, in addition to those previously identified under Horizon Year (2040) Without Project traffic conditions. However, the addition of Project traffic at the intersections listed above is anticipated to result in a significant cumulative impact.

The total fair share contribution for this project is required based on the traffic report dated May 26, 2017 from Urban Crossroads. The fair share breakdown for these improvements is shown below. 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 $261,651.00. 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:

INTERSECTION	ESTIMATED COST	FAIR SHARE PERCENTAGE	ESTIMATED CONTRIBUTION
Judson at Colton (Redlands)			
Install traffic signal	$ 600,000.00	7.743	$ 46,460.00
Restripe EB lanes	$ 50,000.00		$ 3,872.00
Restripe WB lanes	$ 50,000.00		$ 3,872.00
Intersection Total	**$ 700,000.00**		**$ 4,204.00**
Dearborn at Colton (Redlands)			
Install traffic signal	$ 600,000.00	12.777	$ 76,662.00
Restripe EB lanes	$ 50,000.00		$ 6,388.00
Restripe WB lanes	$ 50,000.00		$ 6,388.00
Intersection Total	**$ 700,000.00**		**$ 89,438.00**
Opal at Mentone Blvd (County/Caltrans)			
Install traffic signal	$ 600,000.00	4.733	$ 28,399.00
Intersection Total	**$ 600,000.00**		**$ 28,399.00**
Opal at Colton (County)			
Install traffic signal	$ 600,000.00	14.935	$ 89,610.00
Intersection Total	**$ 600,000.00**		**$ 89,610.00**
TOTAL FAIR SHARE			**$261,651.00**

c) **No Impact.** The proposed project would not affect air traffic patterns. The project is not expected to 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, because there is no

anticipated notable impact on air traffic volumes by passengers or freight generated by the proposed uses and no new air traffic facilities are proposed.

d) **Less than Significant.** The project would not substantially increase hazards due to a design feature or incompatible uses because there are no incompatible uses proposed by the project that would impact surrounding land uses. Therefore, less than significant impacts related to roadway design features or incompatible uses would result from implementation of the project and no further analysis is warranted.

e) **Less than Significant.** The proposed project would not result in inadequate emergency access to the project area. During project construction, public roads would remain open and available for use by emergency vehicles and other traffic. The proposed project would not result in any roadway closures in the vicinity of the project site. The project site includes three access paths and an additional emergency access path as approved by the County Fire Department. Less than significant impacts would result from implementation of the project and no further analysis is warranted.

f) **Less than Significant.** The project would not conflict with adopted policies, plans, or programs regarding public transit and alternative or non-motorized transportation (e.g., transit amenities) because all alternative transportation improvements have been included in the project design or would be addressed through standard conditions of approval regarding pedestrian access improvements. Less than significant impacts would result from implementation of the project and no further analysis is warranted.

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

TRANSPORTATION/TRAFFIC MITIGATION MEASURES:

T-1 *Fair Share Contribution. A fair share contribution for this project is required and will be based on the fair share percentages calculated in the Urban Crossroads traffic study dated May 26, 2017. The total fair share contribution shall be paid to the Department of Public Works - Traffic Division. At the present time, the total estimated fair share contribution is $261,651. When an application for a building permit is filed, 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.*
[Mitigation Measure T-1] Prior to Building Permit or Occupancy/County Traffic

T-2 *Regional Transportation Fee. This project falls within the Regional Transportation Development Mitigation Fee Plan Area for the Redlands 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 $5.38 per square foot for Industrial Use, which includes the 241,553 sq. ft. building per the site plan dated 08/17/2017.*

Therefore, the estimated Regional Transportation Fees for the Project is $1,299,555.14. This fee includes existing structures onsite in accordance with the Regional Transportation Development Mitigation Plan, Section 9(A)(4), for abandoned or vacant buildings/structures. The current Regional Transportation Development Mitigation Plan can be found at the following website: http://cms.sbcounty.gov/dpw/Transportation/TransportationPlanning.aspx.
[Mitigation Measure T-2] Prior to Building Permit or Occupancy/Land Development

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

SUBSTANTIATION:

The proposed project is not located in a Cultural or Paleontological Resources Overlay area. The analysis in this section is based on the Cultural Resources Assessment, dated July 2014 and prepared by LSA & Associates.

a) **Less than Significant with Mitigation Incorporation.** Assembly Bill (AB) 52 took effect on July 1, 2015. AB 52 requires a lead agency to make best efforts to avoid, preserve, and protect tribal cultural resources. The bill states that tribal cultural resources are:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either (i) included or determined to be eligible for inclusion in the California Register of Historical Resources; or included in a local register of historical resources;
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC Section 5024.1(c);
3. A cultural landscape that meets one of the criteria of 1), above, and is geographically defined in terms of the size and scope of the landscape; and/or
4. A historical resource described in PRC 21084.1, a unique archaeological resource described in PRC 21083.2(g), or a non-unique archaeological resource as defined in PRC 21083(h) if it conforms with the criteria of 1), above.

Prior to the release of the CEQA document for a project, AB 52 requires the lead agency to initiate consultation with a California Native American tribe that is traditionally and culturally

affiliated with the geographic area of the proposed project if: (1) the California Native American tribe requested the lead agency, in writing, to be informed by the lead agency through formal notification of proposed project in the geographic area that is traditionally and through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe, and (2) the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification, and requests the consultation.

As the lead agency under CEQA, the County is responsible for and will be performing formal government-to-government consultation with Native American Tribes under California Assembly Bill 52. The County will conduct formal consultation, and any information obtained through those processes may be included in the EIR.

The project does have the potential to impact resources defined Public Resources Code section 21074. While there are no known resources identified in the area of disturbance, earth-moving activities such as grading, site clearing and perimeter wall construction do possess the potential to impact resources described above through inadvertent discovery. The proposed project area exists within Serrano ancestral territory and, therefore, is of interest to the San Manuel Band of Mission Indians (SMBMI). The project site lies directly within a portion of the Zanja, a listed site on the National Register of Historic Places, which was built by Serrano's and is of extremely high cultural sensitivity. The Zanja has been state-listed since 1932 and federally-listed since 1977.

With the participation of affected California Native Tribes, it has been determined that a significant impact can be avoided with onsite tribal monitoring during such earth-moving activities. The County of San Bernardino ("Lead Agency") will continue to conduct Government-to-Government consultation in accordance with, CEQA, AB52, and/or SB18 for the life of the Project, including the timely and comprehensive dissemination of all project-related information and documentation to the SMBMI. The following mitigation measures have been incorporated to reduce impacts to less than significant:

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

TRIBAL CULTURAL RESOURCES MITIGATION MEASURES:

TCR-1 *Archaeological and Tribal Monitoring. Due to the heightened cultural sensitivity of the proposed project area, both an archaeological monitor that meets Secretary of Interior (SOI) qualifications for archaeology and Tribal monitors representing SMBMI shall be present for all ground-disturbing activities that occur within the proposed project APE (which includes, but is not limited to, tree/shrub removal and planting, clearing/grubbing, grading, excavation, trenching, compaction, fence/gate removal and installation, drainage and irrigation removal and installation, hardscape installation (benches, signage, boulders, walls, seat walls, fountains, etc.), and archaeological surveys, testing, and data recovery. A sufficient number of archaeological and Tribal monitors shall be present each*

work day to ensure that simultaneously occurring ground disturbing activities receive thorough levels of monitoring coverage.

The Lead Agency shall inform the Project developer/applicant of its responsibility to provide compensation (hourly wages, per diem, mileage, lodging, etc.) for all archaeological and Tribal monitors and the services these individuals provide as part of the monitoring effort for the Project and the need for a Monitoring Plan to be developed prior to the issuance of permits.

Prior to the issuance of any ground disturbance-related permits (such as grading permits), the Lead Agency shall contact and coordinate with SMBMI to facilitate communications with the Project developer/applicant so that all Parties can develop a mutually-acceptable Archaeological and Tribal Monitoring Plan. This Plan shall be approved and adopted by the Lead Agency prior to the issuance of any ground disturbance-related permits. The Plan's implementation in the field shall be enforced by the Lead Agency for the life of the Project
[Mitigation Measure TCR-1] Prior to Grading or Land Disturbance/Planning

TCR-2 *Discovery Protocol and Treatment. If an archaeological deposit or tribal cultural resource is discovered within the Project area, ground disturbing activities shall be suspended 100 feet around the resource(s) and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. Representatives from SMBMI, the Archaeological Monitor, the Project applicant/developer, and the Lead Agency shall confer regarding treatment of the discovered resource(s). A treatment plan shall be prepared, reviewed and adopted by all Parties, and then implemented to protect the identified resources from damage and destruction. The treatment plan shall contain a research design to evaluate the resource for significance under both NHPA and CEQA criteria. This research design shall (1) acknowledge the necessity for additional, internal Tribal deliberations and culturally-appropriate treatments for all tribal cultural resources and (2) for archaeological resources, include fieldwork and sampling procedures appropriate to ascertain the boundaries, nature, and content of the resource in accordance with current, professional archaeological best practices, as agreed upon by SMBMI.*

Should the resource be determined to be significant under either federal- or state-level criteria, avoidance and preservation in place shall be the preferred treatment. Should the resource not be a candidate for avoidance or preservation in place, a resource-specific mitigation plan shall be developed, reviewed by all Parties, and implemented. Should the mitigation plan include archaeological data recovery, a research design shall be developed that exhausts the research potential of the resource in accordance with current professional archaeology standards. Any mitigation plan that results in the removal of cultural resources (artifacts, ecofacts, features, etc.) from their original provenience shall also include a comprehensive discussion of resource processing, analysis, curation, and reporting protocols and obligations.

a) All mitigation, treatment, and data recovery plans shall be developed in consultation with SMBMI.

b) All fieldwork related to treatment, mitigation, and data recovery plans shall require monitoring by an SMBMI Tribal Monitor.

c) All draft reports containing the significance and treatment findings and data recovery results shall be prepared by an SOI-qualified archaeologist hired by the applicant/developer and submitted to the Lead Agency and SMBMI for their review and comment.

d) All final reports are to be submitted to the local CHRIS Information Center, the Lead Agency, and SMBMI.

[Mitigation Measure TCR-2] General Requirement/Planning

TCR-3 *Treatment and Disposition of Artifacts, Ecofacts, Cultural Deposits. SMBMI requests that culturally-appropriate and professionally proper procedures shall be followed with respect to all artifacts and remains affiliated with Native peoples—whether prehistoric, protohistoric, or historic.*

a) Any sacred/ceremonial objects or objects of cultural patrimony discovered within the project area are to be offered to the MLD of record for appropriate treatment and all claims of ownership to such materials waived by the applicant/developer/landowner.

b) SMBMI requests that all other artifacts be permitted to be either (1) left in situ should avoidance or protection in place be guaranteed or (2) reburied, on site, in a location that will be protected from future disturbance. A fully executed reburial agreement shall be developed with SMBMI. This agreement shall include measures and provisions to protect the future reburial area from any future impacts (vis a vis project plans, conservation/preservation easements, deed riders, etc.). Reburial shall not occur until all ground-disturbing activities associated with the Project have been completed, all monitoring has ceased, all cataloguing and basic recordation of cultural resources have been completed, and a final monitoring report has been issued to Lead Agency, CHRIS, and SMBMI.

c) Should it occur that avoidance, preservation in place, or on-site reburial are not an option for some artifacts, SMBMI requests that the landowner relinquish all ownership and rights to this material and consult with the Tribes to identify an American Association of Museums (AAM)-accredited facility within San Bernardino County that can accession the materials into their permanent collections and provide for the proper care of these objects in accordance with the 1993 CA Curation Guidelines. A curation agreement with an appropriate qualified repository shall be developed between the landowner and museum that legally and physically transfers the collections and associated records to the facility. This agreement shall stipulate the payment of fees necessary for permanent curation of the collections and associated records and the obligation of the Project developer/applicant to pay for those fees.

d) Where appropriate and agreed upon in advance by SMBMI, the SOI-qualified archaeologist hired by the applicant/developer may conduct analyses of certain artifact classes (including, but not limited to, shell, non-human bone, ceramic, stone) if required by CEQA, the Project's mitigation measures, and/or conditions of approval for the Project. Upon completion of authorized and mandatory analyses, the applicant/developer shall provide said artifacts to SMBMI for reburial on site or to the aforementioned, identified curation facility within sixty (60) days from the completion of

analyses and not to exceed one hundred and twenty (120) days after the initial recovery of the items from the field.

[Mitigation Measure TCR-3] General Requirement/Planning

Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
XVIII. UTILITIES AND SERVICE SYSTEMS - Will the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded, entitlements needed?	☐	☐	☒	☐
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?	☐	☐	☒	☐
f) Be served by a landfill(s) with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

SUBSTANTIATION:

a) **Less than Significant.** Wastewater sewer service for the project would be provided by the City of Redlands. Sewage would be conveyed in public sewer lines in the public street rights-of-way on the project site to the existing sewer lines. As such, 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 comply with all regulation and requirements established by the Regional Water Quality Control Board.

b) **Less than Significant.** The proposed project would not require or result in a need for new water or wastewater treatment facilities or expansion of existing facilities. There is sufficient capacity in the existing system for the proposed use. The proposed project would be served by existing sewer and water lines in proximity to the project, provided by the City of Redlands.

c) **Less than Significant.** A Final WQMP is required prior to issuance of a grading permit, which would ensure that the project design complies with regulations and requirements associated with hydrology and water quality. The project is not expected to significantly alter drainage patterns off-site and no expansion or new storm drain facilities beyond what is already planned for area-wide drainage would be required. No further analysis is warranted.

d) **Less than Significant.** Sufficient water supplies are available to serve the project from existing entitlements and resources. Due to the relatively small scale project in comparison to the City of Redlands's current service area, the City has adequate capacity to accommodate the project and the impact of the project on water supplies would be less than significant.

e) **Less than Significant.** The proposed project would not require or result in the construction of new wastewater treatment facilities or the expansion of existing wastewater treatment facilities. The City of Redlands has adequate capacity to serve the projected wastewater treatment demand for the project, in addition to the provider's existing commitments. Accordingly, no impacts are anticipated from implementation of the proposed project.

f) **Less than Significant.** The County of San Bernardino Solid Waste Management Division (SWMD) is responsible for the operation and management of the County of San Bernardino's solid waste disposal system which consists of five regional landfills and nine transfer stations. According to the 2007 San Bernardino Countywide Integrated Waste Management Plan, the County of San Bernardino continues to have disposal capacity available for solid waste generated, but not diverted, in excess of 15 years as required under Public Resources Code Section 41701. The systemwide characteristics indicate that the County has an estimated site-life capacity of 38 years; however, the projected site life is calculated at 26 years of refuse capacity. Existing landfills serving the project area are the Mid-Valley Landfill in Rialto and San Timoteo Landfill in Redlands. The Mid-Valley Landfill has a maximum permitted capacity of 20,400,000 cubic yards and 7,500.00 tons per day of throughput with approximately 13,605,488 cubic yards of remaining capacity. The San Timoteo Landfill has a maximum permitted capacity of 101,300,000 cubic yards and 2,000.00 tons per day of throughput with approximately 67,520,000 cubic yards of remaining capacity. Due to the relatively small amount of waste generated by the project compared with the capacity in the system the project would result in less than significant impacts

g) **Less than Significant.** The proposed project would comply with all federal, state, and local statutes and regulation 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). Solid waste produced during the construction phase of this project would be disposed of in accordance with all applicable regulations, including the County construction and demolition debris reduction ordinance.

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

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

SUBSTANTIATION:

a) **Less than Significant.** The project would not 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. No potential impact on rare or endangered species or other species of plants or animals or habitat identified by the California Natural Diversity Database (CNDDB) has been identified in the analysis of the proposed project, based on the disturbed condition of the project site. There are no identified historic or prehistoric resources identified on this site.

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

The project would not have impacts that are individually limited, but cumulatively considerable. Special studies prepared to analyze impacts of the proposed project consider and evaluate existing and planned conditions of the surrounding area and the region. Existing and planned

infrastructure in the surrounding area has been planned to accommodate planned build out of the area, including the project site with the planned uses.

c) **Less than Significant.** The design of the project, with application of County policies, standards, and design guidelines ensure that there would be no substantial adverse effects on human beings, either directly or indirectly. Impacts of the proposed project would be less than significant.

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:

XVIII. MITIGATION MEASURES:

(Any mitigation measures which are not "self-monitoring" will have a Mitigation Monitoring and Reporting Program prepared and adopted at time of project approval. Condition compliance will be verified by existing procedure [CCRF].)

AIR QUALITY MITIGATION MEASURES:

AQ-1 *AQ/Operational Mitigation. The "developer" shall implement the following air quality mitigation 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) Engines shall be maintained in good working order to reduce emissions. Ultra low-sulfur diesel fuel shall be utilized.
e) Electric, CNG and gasoline-powered equipment shall be substituted for diesel-powered equipment, where feasible.
f) On-site electrical power connections shall be made available, where feasible.
g) All transportation refrigeration units (TRU's) shall be provided electric connections, when parked on-site.
h) 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.

[Mitigation Measure AQ-1] General Requirements/Planning

AQ-2 *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.

[Mitigation Measure AQ-2] Prior to Grading Permit/Planning

AQ-3 *AQ - Construction Mitigation. 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).

[Mitigation Measure AQ-3] Prior to Grading Permit/Planning

AQ-4 *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.

[Mitigation Measure AQ-4] Prior to Building Permit/Planning

AQ-5 *AQ – Installation. The developer will submit for review and obtain approval from County Planning evidence that all air quality mitigation measures have been installed properly and that specified performance objectives are being met to the satisfaction of County Planning and County Building and Safety.*
[Mitigation Measure AQ-5] Prior to Occupancy/Planning

BIOLOGICAL RESOURCES MITIGATION MEASURES:

BIO-1 *Nesting Bird Mitigation – Pre-Construction Surveys. Removal of vegetation shall be conducted outside of the nesting season for migratory birds to avoid direct impacts. The migratory bird nesting season is between February 1 and September 15. Within 3 days prior to vegetation clearing or ground disturbance associated with construction or grading that would occur during the nesting/breeding season (February 1 through September 15), the Applicant shall retain a qualified biologist to determine if active nests of species protected by the Migratory Bird Treaty Act or the California Fish and Game Code are present within or adjacent to the disturbance zone or within 100 feet (300 feet for raptors) of the disturbance zone. The surveys will be conducted no more than three days prior to initiation of disturbance work within active project areas. If ground disturbance activities are delayed, then additional pre-disturbance surveys will be conducted such that no more than three days will have elapsed between the survey and ground disturbance activities. If ground disturbance will be phased across the project site, pre-disturbance surveys may also be phased to conform to the development schedule.*

If active nests are found, clearing and construction within 200 feet of the nest (or a lesser distance if approved by the U.S. Fish & Wildlife Service) will be postponed or halted, until the nest is vacated and juveniles have fledged, as determined by the biologist. Avoidance buffers will be established in the field with highly visible construction fencing or flagging, and construction personnel will be instructed on the sensitivity of nest areas. A qualified biologist will serve as a construction monitor during those periods when construction activities will occur near active nests to ensure that no inadvertent impacts on these nests occur.

The results of pre-construction nesting bird surveys, including graphics showing the locations of any nests detected, and documentation of any avoidance measures taken, will be submitted

to the County of San Bernardino and the California Department of Fish & Wildlife within 14 days of completion of the pre-construction surveys or construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds. [Mitigation Measure BIO-1] Prior to Land Disturbance or Grading Permit/Planning

BIO-2 *Burrowing Owl Mitigation – Pre-Construction Surveys. Within 30 days prior to ground disturbance, the Applicant shall retain a qualified biologist to conduct burrowing owl surveys within the area to be disturbed. The survey will be performed by walking parallel transects spaced no more than 20 meters apart, and will be focused on detecting burrows that are occupied, or are suitable for occupation, by the burrowing owl. The results of the surveys, including graphics showing the locations of any active burrows detected and any avoidance measures required, will be submitted to the County of San Bernardino and the California Department of Fish & Wildlife (CDFW) within 14 days following completion of the surveys. If active burrows are detected, the following take avoidance measures will be implemented:*

a) If burrowing owls are observed using burrows on-site during the non-breeding season (September through January, unless determined otherwise by a qualified biologist based on field observations in the region), occupied burrows will be left undisturbed, and no construction activity will take place within 300 feet of the burrow where feasible (see below).

b) If avoiding disturbance of owls and owl burrows on-site is infeasible, owls will be excluded from all active burrows through the use of exclusion devices placed in occupied burrows in accordance with protocols established in CDFW's Staff Report on Burrowing Owl Mitigation (2012). Specifically, exclusion devices, utilizing one-way doors, will be installed in the entrance of all active burrows. The devices will be left in the burrows for at least 48 hours to ensure that all owls have been excluded from the burrows. Each of the burrows will then be excavated by hand and/or mechanically and refilled to prevent reoccupation. Exclusion will continue until the owls have been successfully excluded from the disturbance area, as determined by a qualified biologist.

c) Any active burrowing owl burrows detected on-site during the breeding season (February through August, unless determined otherwise by a qualified biologist based on field observations in the region), will not be disturbed. Construction activities will not be conducted within 300 feet of an active on-site burrow at this season.

[Mitigation Measure BIO-2] Prior to Land Disturbance or Grading Permit/Planning

BIO-3 *Burrowing Owl Mitigation – Management Plan. If burrowing owl are determined to occupy the project site, prior to issuance of a grading permit, a habitat management plan for the burrowing owl will be developed. The plan will include provisions for protecting foraging habitat and replacing any active burrows from which owls may be passively evicted as allowed by Mitigation Measure BIO-1. The Burrowing Owl Management Plan will be submitted to the County of San Bernardino and the California Department of Fish and Wildlife for review and approval prior to issuance of a grading permit for the Project. At a minimum, the plan will include the following elements:*

a) If occupied burrows are to be removed, the plan will contain schematic diagrams of artificial burrow designs and a map of potential artificial burrow locations that would compensate for the burrows removed.

b) All active on-site burrows excavated as described in Mitigation Measure BIO-1 will be replaced with suitable natural or artificial burrows within the preservation areas approved by the County of San Bernardino.

c) Measures prohibiting the use of rodenticides during the construction process if any active on-site burrows are identified.

d) The plan will ensure that adequate suitable burrowing owl foraging habitat is provided in proximity to natural or artificial burrows within off-site mitigation areas.

[Mitigation Measure BIO-3] – Prior to Land Disturbance or Grading Permit/Planning

BIO-4 *Coast Horned Lizard and Black-tailed Jack Rabbit Mitigation – Management Plan. A biological monitor shall be present during ground disturbing activities to avoid direct impacts to coast horned lizard and black-tailed jack rabbit.*
[Mitigation Measure BIO-4] – Prior to Land Disturbance or Grading Permit/Planning

NOISE MITIGATION MEASURES:

N-1 *Noise Study. If at the time a tenant is identified for the Project site, a tenant-specific noise study shall be required for any special noise generators or equipment which are not already included in this analysis: idling trucks, delivery truck activities, backup alarms, as well as loading and unloading of dry goods, parking lot vehicle movements, roof-top air conditioning units, and outdoor storage activities for finished products. [Mitigation Measure N-1] Prior to Final Occupancy/Planning*

N-2 *Noise Buffer Zone. A 75-foot buffer zone shall be enforced at the Project site, as shown on the site plan, in which the following activities shall not be allowed within 75 feet of the eastern property line of the residential home in the northwestern portion of the Project site:*

- *Truck activity of any kind, including the pick-up or drop-off of finished products or storage materials, the use of back-up alarms, idling, and parking*
- *Back-up alarms for any alternative transport methods used to store finished products or materials within the buffer zone.*

[Mitigation Measure N-2] – General Requirement/Planning

N-3 *Equipment Maintenance. All on-site operating equipment under the control of the building user that is used in outdoor areas (including but not limited to trucks, tractors, forklifts, and hostlers), shall be operated with properly functioning and well-maintained mufflers.*
[Mitigation Measure N-3] – General Requirement/Planning

N-4 *Operational Signage. The truck access gates and loading docks within the truck court on the Project site shall be posted with signs which state:*

- *Truck drivers shall turn off engines when not in use;*
- *Diesel trucks servicing the Project shall not idle for more than five (5) minutes; and*
- *Telephone numbers of the building facilities manager and the California Air Resources*
- *Board (CARB) to report violations.*

[Mitigation Measure N-4] – General Requirement/Planning

N-5 *Temporary Noise Control Barrier. Install minimum 10-foot high temporary construction noise barriers at the Project's western site boundaries adjacent to sensitive receivers on Opal Avenue for the duration of Project construction. Prior to issuance of Grading or Building permits, the applicant shall submit a Temporary Noise Control Plan that is subject to review and approval by County Planning and Building and Safety. The noise control barriers must have a solid face from top to bottom. The noise control barriers must meet the minimum height and shall be constructed as follows:*

- *The temporary noise barriers shall provide a minimum transmission loss of 20 dBA (Federal Highway Administration, Noise Barrier Design Handbook). The noise barrier shall be constructed using an acoustical blanket (e.g. vinyl acoustic curtains or quilted blankets) attached to the construction site perimeter fence or equivalent temporary fence posts;*
- *The noise barrier must be maintained and any damage promptly repaired. Gaps, holes, or weaknesses in the barrier or openings between the barrier and the ground shall be promptly repaired;*
- *The noise control barrier and associated elements shall be completely removed and the site appropriately restored upon the conclusion of the construction activity.*

[Mitigation Measure N-5] – Prior to Grading and/or building Permit/Planning

N-6 *Construction Noise Measures. The developer shall comply with the following noise mitigation measures for the duration of Project construction. Prior to approval of grading and/or building permits, the applicant shall include the following noise reduction mitigation measures on all construction documents:*

- *The use of dozers shall be prohibited within 150 feet of the two nearby occupied sensitive residential homes on Opal Avenue.*
- *Prior to approval of grading plans and/or issuance of building permits, plans shall include a note indicating that noise-generating Project construction activities shall only occur between the hours of 7:00 a.m. to 7:00 p.m.; with no activity on Sundays and Federal holidays (Section 83.01.080(g)(3) of the County of San Bernardino Development Code).*
- *During all Project site construction, the construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards. 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.*
- *The construction contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receivers nearest the Project site (i.e., to the center) during all Project construction.*
- *The construction contractor shall limit haul truck deliveries to the same hours specified for construction equipment (between the hours of 7:00 a.m. to 7:00 p.m.; with no activity on Sundays and Federal holidays). The contractor shall design delivery routes to minimize the exposure of sensitive land uses or residential dwellings to delivery truck-related noise, consistent with County of San Bernardino General Plan Noise Element, Policy N 1.5.*

[Mitigation Measure N-6] – Prior to Grading and/or Building Permit/Planning

TRANSPORTATION/TRAFFIC MITIGATION MEASURES:

T-1 *Fair Share Contribution. A fair share contribution for this project is required and will be based on the fair share percentages calculated in the Urban Crossroads traffic study dated May 26, 2017. The total fair share contribution shall be paid to the Department of Public Works - Traffic Division. At the present time, the total estimated fair share contribution is $261,651. When an application for a building permit is filed, 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. [Mitigation Measure T-1] Prior to Building Permit or Occupancy/County Traffic*

T-2 *Regional Transportation Fee. This project falls within the Regional Transportation Development Mitigation Fee Plan Area for the Redlands 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 $5.38 per square foot for Industrial Use, which includes the 253,315 sq. ft. building per the site plan dated 08/17/2017.*

Therefore, the estimated Regional Transportation Fees for the Project is $1,362,834.70. This fee includes existing structures onsite in accordance with the Regional Transportation Development Mitigation Plan, Section 9(A)(4), for abandoned or vacant buildings/structures. The current Regional Transportation Development Mitigation Plan can be found at the following website:
http://cms.sbcounty.gov/dpw/Transportation/TransportationPlanning.aspx.
[Mitigation Measure T-2] Prior to Building Permit or Occupancy/Land Development

TRIBAL CULTURAL RESOURCES MITIGATION MEASURES:

TCR-1 *Archaeological and Tribal Monitoring. Due to the heightened cultural sensitivity of the proposed project area, both an archaeological monitor that meets Secretary of Interior (SOI) qualifications for archaeology and Tribal monitors representing SMBMI shall be present for all ground-disturbing activities that occur within the proposed project APE (which includes, but is not limited to, tree/shrub removal and planting, clearing/grubbing, grading, excavation, trenching, compaction, fence/gate removal and installation, drainage and irrigation removal and installation, hardscape installation (benches, signage, boulders, walls, seat walls, fountains, etc.), and archaeological surveys, testing, and data recovery. A sufficient number of archaeological and Tribal monitors shall be present each work day to ensure that simultaneously occurring ground disturbing activities receive thorough levels of monitoring coverage.*

The Lead Agency shall inform the Project developer/applicant of its responsibility to provide compensation (hourly wages, per diem, mileage, lodging, etc.) for all archaeological and Tribal monitors and the services these individuals provide as part of the monitoring effort for

the Project and the need for a Monitoring Plan to be developed prior to the issuance of permits.

Prior to the issuance of any ground disturbance-related permits (such as grading permits), the Lead Agency shall contact and coordinate with SMBMI to facilitate communications with the Project developer/applicant so that all Parties can develop a mutually-acceptable Archaeological and Tribal Monitoring Plan. This Plan shall be approved and adopted by the Lead Agency prior to the issuance of any ground disturbance-related permits. The Plan's implementation in the field shall be enforced by the Lead Agency for the life of the Project. [Mitigation Measure TCR-1] Prior to Grading or Land Disturbance/Planning

TCR-2 *Discovery Protocol and Treatment. If an archaeological deposit or tribal cultural resource is discovered within the Project area, ground disturbing activities shall be suspended 100 feet around the resource(s) and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. Representatives from SMBMI, the Archaeological Monitor, the Project applicant/developer, and the Lead Agency shall confer regarding treatment of the discovered resource(s). A treatment plan shall be prepared, reviewed and adopted by all Parties, and then implemented to protect the identified resources from damage and destruction. The treatment plan shall contain a research design to evaluate the resource for significance under both NHPA and CEQA criteria. This research design shall (1) acknowledge the necessity for additional, internal Tribal deliberations and culturally-appropriate treatments for all tribal cultural resources and (2) for archaeological resources, include fieldwork and sampling procedures appropriate to ascertain the boundaries, nature, and content of the resource in accordance with current, professional archaeological best practices, as agreed upon by SMBMI.*

Should the resource be determined to be significant under either federal- or state-level criteria, avoidance and preservation in place shall be the preferred treatment. Should the resource not be a candidate for avoidance or preservation in place, a resource-specific mitigation plan shall be developed, reviewed by all Parties, and implemented. Should the mitigation plan include archaeological data recovery, a research design shall be developed that exhausts the research potential of the resource in accordance with current professional archaeology standards. Any mitigation plan that results in the removal of cultural resources (artifacts, ecofacts, features, etc.) from their original provenience shall also include a comprehensive discussion of resource processing, analysis, curation, and reporting protocols and obligations.

a) All mitigation, treatment, and data recovery plans shall be developed in consultation with SMBMI.
b) All fieldwork related to treatment, mitigation, and data recovery plans shall require monitoring by an SMBMI Tribal Monitor.
c) All draft reports containing the significance and treatment findings and data recovery results shall be prepared by an SOI-qualified archaeologist hired by the applicant/developer and submitted to the Lead Agency and SMBMI for their review and comment.

d) All final reports are to be submitted to the local CHRIS Information Center, the Lead Agency, and SMBMI.

[Mitigation Measure TCR-2] General Requirement/Planning

TCR-3 *Treatment and Disposition of Artifacts, Ecofacts, Cultural Deposits. SMBMI requests that culturally-appropriate and professionally proper procedures shall be followed with respect to all artifacts and remains affiliated with Native peoples—whether prehistoric, protohistoric, or historic.*

a) Any sacred/ceremonial objects or objects of cultural patrimony discovered within the project area are to be offered to the MLD of record for appropriate treatment and all claims of ownership to such materials waived by the applicant/developer/landowner.

b) SMBMI requests that all other artifacts be permitted to be either (1) left in situ should avoidance or protection in place be guaranteed or (2) reburied, on site, in a location that will be protected from future disturbance. A fully executed reburial agreement shall be developed with SMBMI. This agreement shall include measures and provisions to protect the future reburial area from any future impacts (vis a vis project plans, conservation/preservation easements, deed riders, etc.). Reburial shall not occur until all ground-disturbing activities associated with the Project have been completed, all monitoring has ceased, all cataloguing and basic recordation of cultural resources have been completed, and a final monitoring report has been issued to Lead Agency, CHRIS, and SMBMI.

c) Should it occur that avoidance, preservation in place, or on-site reburial are not an option for some artifacts, SMBMI requests that the landowner relinquish all ownership and rights to this material and consult with the Tribes to identify an American Association of Museums (AAM)-accredited facility within San Bernardino County that can accession the materials into their permanent collections and provide for the proper care of these objects in accordance with the 1993 CA Curation Guidelines. A curation agreement with an appropriate qualified repository shall be developed between the landowner and museum that legally and physically transfers the collections and associated records to the facility. This agreement shall stipulate the payment of fees necessary for permanent curation of the collections and associated records and the obligation of the Project developer/applicant to pay for those fees.

d) Where appropriate and agreed upon in advance by SMBMI, the SOI-qualified archaeologist hired by the applicant/developer may conduct analyses of certain artifact classes (including, but not limited to, shell, non-human bone, ceramic, stone) if required by CEQA, the Project's mitigation measures, and/or conditions of approval for the Project. Upon completion of authorized and mandatory analyses, the applicant/developer shall provide said artifacts to SMBMI for reburial on site or to the aforementioned, identified curation facility within sixty (60) days from the completion of analyses and not to exceed one hundred and twenty (120) days after the initial recovery of the items from the field.

[Mitigation Measure TCR-3] General Requirement/Planning

GENERAL REFERENCES

California Department of Resources Recycling and Recovery (CalRecycle) website. Accessed January 27, 2014. http://www.calrecycle.ca.gov/

CEQA Guidelines, Appendix G.

The Community Foundation. County of San Bernardino 2012 Community Indicators Report. Available at: http://www.sbcounty.gov/uploads/cao/feature/content/2012_cir_sb.pdf

County of San Bernardino. (2007, March 13). *County of San Bernardino 2007 Development Code.* Amended July 25, 2013. Available at http://cms.sbcounty.gov/lus/Planning/DevelopmentCode.aspx

County of San Bernardino. (2007, March 13). *County of San Bernardino 2007 General Plan.* Amended July 18, 2013. http://www.co.san-bernardino.ca.us/landuseservices/general_plan/Default.asp.

County of San Bernardino Geologic Hazards Overlays Map FH30C (Redlands).

County of San Bernardino Hazard Overlay Map FH30C (Redlands).

County of San Bernardino Identified Hazardous Materials Waste Sites List, April 1998.

County of San Bernardino, Countywide Integrated Waste Management Plan, March 1995.

County of San Bernardino, Greenhouse Gas Emissions Reduction Plan, January 6, 2012.

County of San Bernardino, *San Bernardino County Storm Water Program, Model Water Quality Management Plan Guidance.*

County of San Bernardino Road Planning and Design Standards.

Environmental Impact Report, San Bernardino County General Plan, 2007.

Federal Emergency Management Agency Flood Insurance Rate Map and Flood Boundary Map.

South Coast Air Quality Management District, CEQA Air Quality Handbook, November 1993.

U.S. Department of Agriculture, Natural Resources Conservation Service. Web Soil Survey. Available at http://websoilsurvey.nrcs.usda.gov/.

PROJECT SPECIFIC STUDIES

AIR QUALITY STUDY

Air Quality Impact Analysis for 800 Opal, LLC, prepared by Urban Crossroads, May 31, 2017.

GREENHOUSE GAS ANALYSIS
Greenhouse Gas Analysis for 800 Opal, LLC, prepared by Urban Crossroads, May 31, 2017.

HEALTH RISK ASSESSMENT
Mobile Source Diesel Health Risk Assessment for 800 Opal, LLC, prepared by Urban Crossroads, May 31, 2017.

BIOLOGICAL RESOURCES STUDY
Biological Resources Study for 800 Opal, LLC, Mentone, unincorporated San Bernardino County, California," prepared by Hernandez Environmental Services, June 2017.

BIOLOGICAL RESOURCES STUDY
Focused Burrowing Owl Survey Report for 800 Opal, LLC, Mentone, unincorporated San Bernardino County, California," prepared by Hernandez Environmental Services, September 6, 2017.

CULTURAL STUDY
Cultural Resources Assessment for 800 Opal, LLC, Mentone, unincorporated San Bernardino County, California," prepared by LSA, July, 2014.

DRAINAGE STUDY

GEOLOGY/SOILS STUDY
Report of Limited Geotechnical Study and Infiltrometer Testing for 800 Opal, LLC, Mentone Area of San Bernardino County, California, prepared by Hilltop Geotechnical, Inc., June 6, 2017.

NOISE STUDY
Noise Impact Analysis County of San Bernardino, California," prepared by Urban Crossroads, Inc., May 31, 2017.

WATER QUALITY MANAGEMENT PLAN

FISCAL IMPACT ANALYSIS
Fiscal Impact analysis for 800 Opal, LLC, Mentone, prepared by The Natelson Dale Group, Inc., May 31, 2017.