

CITY OF REDLANDS

ENVIRONMENTAL CHECKLIST FORM AND INITIAL STUDY

1. **Project Title:** GO-Store-It Self Storage (Conditional Use Permit No. 1168, Lot Merger No.0003, Ordinance Text Amendment No. 363, and Street Vacation No. 186)
2. **Lead Agency Name and Address:**
City of Redlands
Development Services Department
35 Cajon Street, Suite 20
Redlands, CA 92373
3. **Contact Person and Phone Number:**
Emily Elliott
Senior Associate, Contract Planner
(909) 798-7555
4. **Project Location:** The Project Site is located in the City of Redlands, San Bernardino County. The 6.34-acre property is located between Wabash and Jasper avenues on the south side of Naples Avenue. The Assessor's Parcel Number (APN) is 0298-051-07. The Project Site is in the eastern portion of the City of Redlands (see Figure 1 - Regional Location and Figure 2 - Project Vicinity).
5. **Project Sponsor's Name and Address:**
Madison Capital Group
450 Newport Center Drive, Suite 250
Newport Beach, CA 92660
6. **General Plan Designation:** Commercial
7. **Zoning:** C-4 (Highway Commercial)
8. **Project Description:** Madison Capital Group (Project Applicant) is requesting approval from the City of Redlands for a Conditional Use Permit, Lot Merger, Ordinance Text Amendment, and Street Vacation to develop a 6.34-acre parcel, into a self-storage facility with a 700-square-foot leasing office and 11 buildings to include 835 units (see Figure 3 – Site Plan). The Proposed Project is known as GO-Store-It.

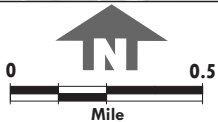
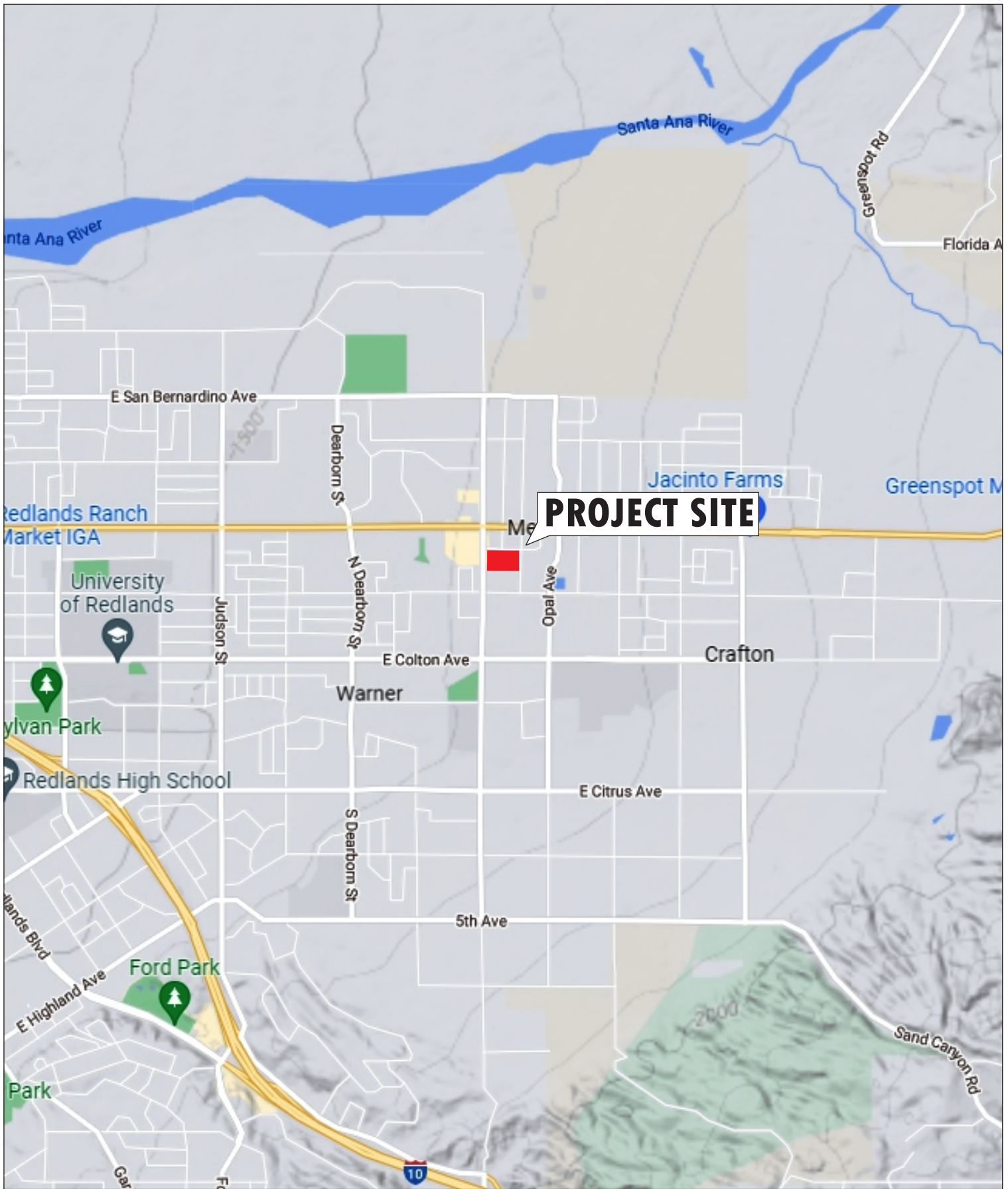
The Project Site is generally flat, gently sloping from east to west with an elevation of approximately 1,630 feet above mean sea level (amsl) in the western portion to 1,614 feet amsl in the eastern portion. The Project Site is vacant and contains ruderal vegetation. Disturbance of the site has occurred from vehicles, discing, and trash dumping.

The Project Site is currently zoned C-4 (Highway Commercial) and designated in the City of Redlands 2035 General Plan (General Plan) for Commercial uses. The Project Application includes an Ordinance Text Amendment to add "Self-storage with a minimum of 5 acres or more" as a use that requires a Conditional Use Permit (CUP) in the C-4 District. The Proposed Project includes a Street vacation to vacate 3 feet on Jasper Avenue. The Lot Merger is required to merge the four lots comprising the Project Site into one.

Access to the Project Site would be provided by two proposed driveways; one from Jasper Avenue and one from Wabash Avenue; entries to the storage units would be gated.

- 9. Surrounding Land Uses and Setting:** The Project Site is located in a developed area of the city with residential, commercial, and light industrial uses. Adjacent property uses and land use designations are shown below in the table below.

Existing Land Use and General Plan Designation			
Location	Existing Land Use	General Plan Designation	Zoning
Project Site	Vacant & Undeveloped	Commercial	C-4 (Highway Commercial)
North	Commercial (restaurant); Residential	Commercial; Commercial (County)	C-4 (Highway Commercial); General Commercial-Sign Control Primary (CG-SCp) (County)
South	RV Storage Facility	Light Industrial	M-1 (Light Industrial)
East	RV Storage Facility	Light Industrial; Commercial (County)	M-1 (Light Industrial); General Commercial-Sign Control Primary (CG-SCp) (County)
West	Residential and Commercial Shopping Center	Low Density Residential and Commercial	R-1 (Single-Family Residential) and C-4 (Highway Commercial)



Source: Lilburn Corp., August, 2022.

LILBURN
CORPORATION

REGIONAL LOCATION

GOSToreIt Self Storage
City of Redlands, California

FIGURE 1





LOCATION MAP

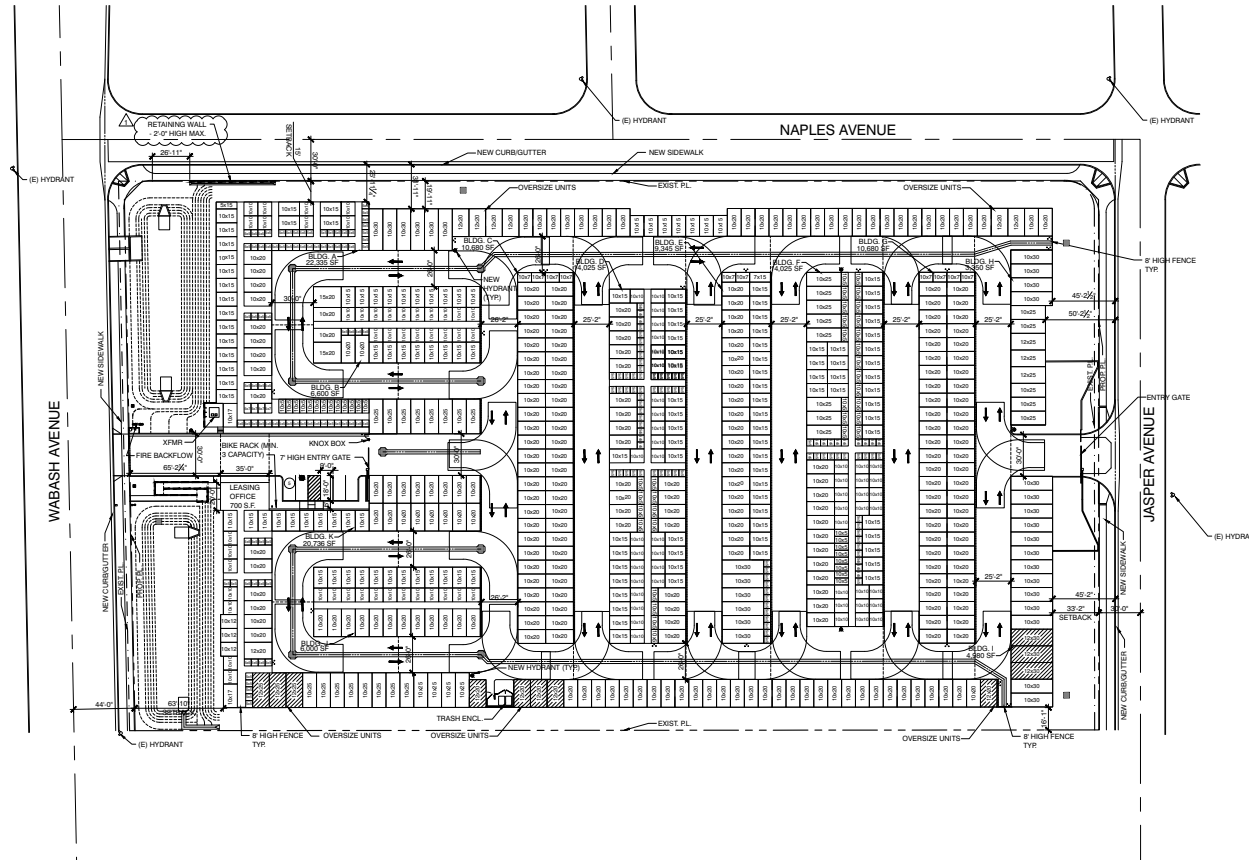
SITE SUMMARY

OWNER - MADISON CAPITAL GROUP
 Contact: Dave Bird, Senior VP Construction and Development
 450 Newport Center Drive, Suite 250
 Newport Beach, CA 92660
 c 909.215.4650
 dbird@madsioncapgroup.com

ASSESSORS PARCEL NUMBER: 0298-051-07
 ZONING C-4 (COMMERCIAL)
 TOTAL SITE AREA: NET +/- 276,228 SF ± 6.34 AC 7.54 AC GROSS
 SITE FAR: ± .45/1
 BUILDING: 123,456 SF
 OFFICE AREA (INCL. IN BLDG./COVERAGE AREA) 700 SF
 BUILDING COVERAGE: 123,456 SF - 44.7%
 PAVED AREA: 95,396 SF - 34.7%
 LANDSCAPE AREA: 56,982 SF - 20.6%
 PARKING PROVIDED : 5 STALLS
 PARKING REQUIRED : 700 SF OFFICE/250 = 3 (4 MIN. REQ'D.)

BUILDING SF	
LEASING OFFICE	700 SF
BUILDING A	25,000 SF
BUILDING B	5,000 SF
BUILDING C	10,000 SF
BUILDING D	14,000 SF
BUILDING E	10,000 SF
BUILDING F	14,000 SF
BUILDING G	10,000 SF
BUILDING H	14,000 SF
BUILDING I	10,000 SF
BUILDING J	14,000 SF
BUILDING K	10,000 SF
TOTAL	123,456 SF

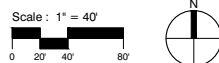
UNIT COUNT					
#	SIZE	QTY	RENTABLE	TYPE	
1	10' x 10'	100	4,000 SF	CC	
2	10' x 10'	4	400 SF	CC	
3	10' x 10'	40	2,000 SF	CC	
4	10' x 10'	1	100 SF	CC	
5	10' x 10'	50	5,000 SF	CC	
6	10' x 10'	5	500 SF	CC	
7	10' x 10'	20	2,000 SF	CC	
SUB TOTAL				10,000 SF	
8	10' x 10'	12	300 SF	DU	
9	10' x 10'	13	650 SF	DU	
10	10' x 10'	10	500 SF	DU	
11	10' x 10'	1	100 SF	DU	
12	10' x 10'	7	500 SF	DU	
13	10' x 10'	2	200 SF	DU	
14	10' x 10'	200	10,000 SF	DU	
15	10' x 10'	10	5,000 SF	DU	
16	10' x 10'	20	5,000 SF	DU	
17	10' x 10'	12	2,000 SF	DU	
18	10' x 10'	12	2,000 SF	DU	
19	10' x 10'	4	1,000 SF	DU	
20	10' x 10'	1	1,000 SF	DU	
21	10' x 10'	2	400 SF	DU	
SUB TOTAL				10,000 SF	
TOTAL				10,000 SF	



GOStoreIt
 SELF STORAGE

REDLANDS, CA

SITE PLAN Scheme A



DATE: 03-28-2022
 MCG JOB #: 21627.01

DATE: 03-14-22 REV. PER INITIAL CITY COMMENTS
 05.05.22 REVISED PER CITY COMMENTS

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 NOTE: This information is conceptual in nature and is subject to adjustments pending further verification and Client, Tenant, and Governmental Agency approvals. No warranties or guarantees of any kind are given or implied by the Architect.

CLEVELAND
 DENVER
 GLENORA
 IRVINE
 ORLANDO
 PHOENIX
 SAN FRANCISCO



SITE PLAN
 GOStoreIt Self Storage
 City of Redlands, California

FIGURE 3

LILBURN
 CORPORATION

10. Other public agencies whose approval is required:

Regional Water Quality Control Board, Santa Ana Region

11. Related Technical Reports (incorporated by reference): The technical studies/reports referenced herein and listed in the References section at the end of this Initial Study have been used to analyze the project. All reports are available for review at City of Redlands Development Services Department.

12. Evaluation Format: This Initial Study is prepared in compliance with the California Environmental Quality Act (CEQA) Guidelines. This format of the study is presented as follows. The project is evaluated based upon its effect on twenty (20) major categories of environmental factors. Each factor is reviewed by responding to a series of questions regarding the impact of the project on each element of the overall factor. The Initial Study Checklist provides a formatted analysis that provides a determination of the effect of the project on the factor and its elements. The effect of the project is categorized into one of the following four categories of possible determinations.

Potentially
Significant
Impact

Less than Significant
with Mitigation

Less than Significant

No Impact

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

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

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

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

ENVIRONMENTAL DETERMINATION

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

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

Brian Foote
Digitally signed by Brian Foote
Date: 2022.08.15 15:44:52
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Signature

8 / 16 / 2022

Date

Brian Foote, City Planner/Planning Manager
Printed Name

ENVIRONMENTAL CHECKLIST FORM

I. AESTHETICS – Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
a) Less Than Significant. Scenic vistas in the General Plan Planning Area consist of the scenic corridors and views to and from the open spaces, canyonlands, hillsides, groves, and the San Bernardino Mountains.¹ The general area provides views of the San Bernardino mountains. The Project Site is located in a developed area of the city with residential, commercial, and light industrial uses. The proposed structures would range from 12 feet to 14 feet. Therefore, the Proposed Project is not anticipated to affect a scenic vista. No significant adverse impacts are identified or anticipated, and no mitigation measures are required.				
b) No Impact. The Project Site is heavily disturbed and contains ruderal vegetation.² No scenic resources are located at the Project Site. The nearest State Scenic highway is Lugonia Avenue/SR-38,³ located approximately 500 feet north of the Project Site. The land between the Project Site and Lugonia Avenue is completely developed with residential and commercial uses. Therefore, implementation of the Proposed Project would not substantially degrade scenic resources within a state scenic highway. No impacts are identified or anticipated, and no mitigation measures are required.				
c) Less than Significant. As stated above, the Project Site is heavily disturbed and contains ruderal vegetation. The Proposed Project proposes to develop the Project Site as a self-				

¹ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.

² Site Visit conducted on July 16, 2022.

³ San Bernardino County. Policy Plan web maps. NR-3 “Scenic Routes & Highways.” Accessed March 29, 2022.

storage facility. It would provide approximately 56,982 SF of landscaping (20.6% of the property). Therefore, the general aesthetics of the site would change, however, the proposed changes would be beneficial. Moreover, it is located in a developed area that consists of residential, commercial, and light industrial uses. The Project Site is currently zoned C-4 (Highway Commercial) and designated in the General Plan for Commercial uses. The Proposed Project requires an Ordinance Text Amendment but would comply with the development standards required for the C-4 zone. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

- d) **Less than Significant.** The Proposed Project would not generate a significant amount of light and glare when compared to the surrounding area, which includes streetlights and existing land uses. The Project Site is surrounded on all sides by development: residential and commercial uses to the north, RV storage facility to the south, an RV storage facility to the east, and residences and commercial shopping center to the west. The design and placement of light fixtures for the Proposed Project would be reviewed for consistency with City standards and subject to City approval. City Standards require shielding, diffusing, or indirect lighting to avoid glare. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

II. AGRICULTURE AND FORESTRY RESOURCES

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

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code	☐	☐	☐	☒

section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 (g))?

- d) Result in loss of forest land or conversion of forest land to non-forest use? ☐ ☐ ☐ ☒
- e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use? ☐ ☐ ☐ ☒
- a) **No Impact.** The Project Site is identified as “Grazing Land.”⁴ Grazing Land is land which the existing vegetation is suited to the grazing of livestock. It is not identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Furthermore, the Project Site is surrounded by lands classified as Urban and Built-Up land.⁵ Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- b) **No Impact.** The Project Site is currently zoned Highway Commercial (C-4). It is not zoned for agricultural uses. In addition, the Project Site is not enrolled in a Williamson Act contract.⁶ Implementation of the Proposed Project would not interfere with such a contract. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- c) **No Impact.** The Project Site has a land use designation of Commercial and is currently zoned C-4. The Proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g), timberland. The Project Site does not contain forestland. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- d) **No impact.** The Project Site does not support, nor is it near any forest land. Therefore, implementation of the Proposed Project would not convert forest land to non-forest use. No impacts are identified or anticipated, and no mitigation measures are required.
- e) **No Impact.** The Project Site does not support agricultural or forest land uses that would be lost as a result of the Proposed Project implementation. There are no such land uses in the vicinity. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

⁴ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.2-1: Farmland Classifications.

⁵ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.2-1: Farmland Classifications.

⁶ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.2-1: Farmland Classifications.

III. AIR QUALITY

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

	Potentially Significant Impact	Less than Significant with Mitigation.	Less than Significant	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐
a) Less than Significant. The Project Site is located in the South Coast Air Basin (SCAB). The South Coast Air Quality Management District (SCAQMD) has jurisdiction over air quality issues and regulations within the SCAB. The Air Quality Management Plan (AQMP) for the SCAB establishes a program of rules and regulations administered by the SCAQMD to obtain attainment of the state and federal ambient air quality standards. The most recent AQMP (AQMP 2016) was adopted by the SCAQMD on March 3, 2017. The 2016 AQMP incorporates the latest scientific and technological information and planning assumptions, including transportation control measures developed by the Southern California Association of Governments (SCAG) from the 2016 Regional Transportation Plan/Sustainable Communities Strategy, and updated emission inventory methodologies for various source categories. Consistency with the AQMP 2016 for general development projects is determined by demonstrating compliance with local land use plans and/or employment projections.				

The Proposed Project is consistent with the City of Redlands 2035 General Plan designation of Commercial and would therefore be consistent with the land uses assumed in the adopted General Plan growth forecasts which are used in development of the AQMP. The emissions associated with the Proposed Project would not result in a conflict or obstruction to the implementation of the AQMP. Therefore, project emissions are within the amounts already accounted for in the AQMP and no significant inconsistency with the

AQMP would occur. The impact would be less than significant, and no mitigation measures are required.

- b) **Less than Significant.** The California Emissions Estimator Model (CalEEMod) recommended by the SCAQMD for all general development projects within the South Coast Air Basin. Therefore, the Proposed Project's construction and operational emissions were estimated using CalEEMod version 2022.1 (Appendix A). The criteria pollutants estimated for include: reactive organic gases (ROG), nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), and fugitive particulates (PM₁₀ and PM_{2.5}). Two of the analyzed pollutants, ROG and NO_x, are ozone precursors. Both summer and winter season emission levels were estimated.

Construction Emissions

Construction emissions are considered short-term, temporary emissions and were modeled with the following construction parameters: demolition (no buildings on-site, site preparation, site grading (fine and mass grading), building construction, paving, and architectural coating. Construction is anticipated to begin in the beginning of 2023 and be completed in 2024. The resulting emissions generated by construction of the Proposed Project are shown in Table 1 and Table 2, which represent summer and winter construction emissions, respectively.

Table 1
Maximum Summer Construction Emissions
(Pounds per Day)

Source/Phase	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
2023	2.1	20.1	22.4	0.0	3.9	2.3
2024	60.0	0.9	1.2	0.0	0.3	0.1
SCAQMD Threshold	75	100	550	150	150	55
Significant	No	No	No	No	No	No

Source: CalEEMod.2022.1 Summer Emissions.

Phases do not overlap and represent the highest concentration.

Table 2
Maximum Winter Construction Emissions
(Pounds per Day)

Source/Phase	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
2023	4.0	40.0	36.7	0.1	9.7	5.7
2024	1.2	11.2	13.1	0.0	1.9	0.8
SCAQMD Threshold	75	100	550	150	150	55
Significant	No	No	No	No	No	No

Source: CalEEMod.2022.1 Winter Emissions.

Phases do not overlap and represent the highest concentration.

As shown in Table 1 and Table 2, construction emissions during either summer or winter seasonal conditions would not exceed the SCAQMD thresholds. Although the Proposed Project does not exceed SCAQMD thresholds for construction emissions, the Project

Proponent would be required to comply with all applicable SCAQMD rules and regulations as the SCAB is in non-attainment status for ozone and suspended particulates (PM₁₀ and PM_{2.5}). The estimated emissions incorporate Rule 403 by default as required during construction.

Operational Emissions

The operational mobile emissions were calculated using CalEEMod with the vehicle trip generation estimates from the Traffic Circulation & VMT Impact Assessment, dated August 9, 2022, prepared for the Proposed Project by Linscott Law & Greenspan. It was determined that the Proposed Project would generate approximately 189 total daily trips. The Proposed Project's long-term operational emissions have been calculated and are summarized below in Table 3 and Table 4.

Table 3
Summer Operational Emissions Summary
(Pounds per Day)

Source	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Mobile	0.9	0.9	8.7	0.0	0.7	0.1
Area	4.5	0.1	9.5	0.0	0.0	0.0
Energy	0.1	0.9	0.8	0.0	0.1	0.1
Totals	5.4	1.9	19.0	0.0	0.8	0.2
SCAQMD Threshold	55	55	550	150	150	55
Significant	No	No	No	No	No	No

Source: CalEEMod.2022.1 Summer Emissions.

Emissions represent the daily maximum emissions.

Table 4
Winter Operational Emissions Summary
(Pounds per Day)

Source	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Mobile	0.8	1.0	7.2	0.0	0.7	0.1
Area	3.0	--	--	--	--	--
Energy	0.1	0.9	0.8	0.0	0.1	0.1
Totals	3.8	1.9	7.9	0.0	0.8	0.2
SCAQMD Threshold	55	55	550	150	150	55
Significant	No	No	No	No	No	No

Source: CalEEMod.2022.1 Winter Emissions.

Emissions represent the daily maximum emissions.

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

- c) **Less than Significant.** For the purposes of a CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as a residence, hospital, convalescent facility or anywhere that it is possible for an individual to remain for 24 hours. Additionally, schools, playgrounds, childcare centers, and athletic facilities can also be considered as sensitive receptors. The use of LSTs is voluntary, to be implemented at the discretion of local public agencies acting as a lead agency pursuant to CEQA. According to SCAQMD LST methodology, LSTs would apply if the Proposed Project includes stationary sources or attracts mobile sources (such as heavy-duty trucks) that may spend long periods queuing and idling at the site; such as industrial warehouse/transfer facilities. The LSTs were developed to analyze the significance of potential air quality impacts of Proposed Projects to sensitive receptors (i.e. schools, single family residences, etc.) and provide screening tables for small projects (one, two, or five acres). Projects are evaluated based on geographic location and distance from the sensitive receptor (25, 50, 100, 200, or 500 meters from the site).

The Project Site is approximately 6.34 acres and therefore the “five-acre” LSTs were utilized for the analysis and represents a worst-case scenario as the larger the site, the larger the screening threshold. The nearest sensitive receptor is the residential development located 26 feet (~8 meters) north of the Project Site; therefore, LSTs are based on a 25-meter distance.

Table 5
Localized Significance Thresholds
(Pounds Per Day)

Source	NO _x	CO	PM ₁₀		PM _{2.5}	
Construction Emissions (Max. from Table 1 and Table 2)	40.0	36.7	9.7		5.7	
Operational Emissions (Max. total from Table 3 and Table 4)	1.9	19.0	0.8		0.2	
Highest Value (lbs/day)	40.0	36.7	9.7	0.8	5.7	0.2
LST	270	2,075	14*	4†	9*	3†
Greater Than Threshold	No	No	No	No	No	No

Note: PM10 and PM2.5 emissions are separated into construction and operational thresholds in accordance with the SCAQMD Mass Rate LST Look-up Tables.

* Construction emissions LST

† Operational emissions LST

Source: CalEEMod.2022.1 Summer & Winter Emissions; SCAQMD Final Localized Significance Threshold

Methodology; SCAQMD Mass Rate Look-up Tables for five-acre site in Source Receptor Area No. 35, distance of 25 meters.

As shown in Table 5, the Proposed Project’s emissions are not anticipated to exceed the thresholds for LSTs. Therefore, the Proposed Project is not anticipated to expose sensitive receptors to substantial pollutant concentrations. No significant adverse impacts are identified or anticipated, and no additional mitigation measures are required.

- d) **Less than Significant.** The Proposed Project does not contain land uses typically associated with the emission of objectionable odors. Potential odor sources associated with

the Proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities. Standard construction requirements would minimize odor impacts resulting from construction activity. It should be noted that any construction odor emissions generated would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction activity. Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City of Redlands's solid waste regulations. The Project would be also required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a) Have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐

- | | Potentially
Significant
Impact | Less than
Significant with
Mitigation | Less than
Significant | No
Impact |
|---|--------------------------------------|---|--------------------------|-------------------------------------|
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan? | ☐ | ☐ | ☐ | ☒ |
| a) Less than Significant with Mitigation. A Biological Technical report was prepared in June 2022 for the Proposed Project by ECORP Consulting, Inc. (ECORP) and is summarized herein (Appendix B for report). The survey was conducted to identify any potential biological resources that could be affected by the Proposed Project pursuant to CEQA, and to identify any biological constraints that would affect the Proposed Project. | | | | |

Prior to conducting the biological reconnaissance survey, ECORP biologists performed a literature review using the CDFW's California Natural Diversity Database (CNDDB; CDFW 2022a) and the California Native Plant Society's (CNPS) Electronic Inventory (CNPSEI; CNPS 2022) to determine the special-status plant and wildlife species that have been documented near the Project Site. ECORP searched CNDDB and CNPSEI records within the Project Site boundaries as depicted on USGS 7.5-minute Redlands topographic quadrangle, plus the surrounding eight topographic quadrangles. The CNDDB and CNPSEI contain records of reported occurrences of federally and/or state-listed endangered, threatened, proposed endangered or threatened species, California Species of Special Concern (SSC), or other special status species or habitat that may occur within or near the Project Site.

The Project Site consists of disturbed land and is largely devoid of native vegetation. Vegetation communities onsite consisted primarily of disturbed ruderal grassland. Disturbances observed on the site were mainly associated with non-native species, vehicle tracks, and scattered trash. The literature review and database searches identified 32 special-status plant species that have been documented in the vicinity of the Project Site. All 32 special-status plant species were presumed to be absent due to the lack of suitable habitat. The removal of vegetation on the Project Site will not contribute to the overall decline of any of the special-status plant species. No significant impacts to special-status plant species are anticipated to result from the development of this Project.

Of the 49 special-status wildlife species identified in the literature review and database searches, one was found to have a low potential to occur onsite: burrowing owl. Burrowing owls are a CDFW SSC and are also protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code. During the field survey, no suitable burrows or burrow-like structures were observed on or adjacent to the Project Site. The site contained marginally suitable burrowing owl habitat consisting of low-growing ruderal grassland habitat and friable, sandy loam soils. The literature review and database search identified one historical record from 1983 within 5 miles of the Project Site. The Project Site did not appear to have been currently or recently used by burrowing owl at the time of the survey; however, the species is mobile and if the conditions were to change on the Project Site, such as if burrows or burrow-like structures are incidentally created or formed, burrowing owl could take up residence on the Project Site. In addition, due to the mobile nature of the

species, it is possible that burrowing owl could use the site prior to the start of project activities, especially if burrows or burrow-like structures are incidentally created or formed prior to the start of construction. If burrowing owl are found to be using or nesting on the Project Site prior to the start of construction, direct impacts may occur in the form of mortality or injury in the form of ground disturbance, entombment, and vegetation removal. Indirect impacts from construction noise, increased human and vehicular activity, dust, habitat loss, and ground vibrations may occur. To avoid potentially significant impacts to burrowing owl, Mitigation Measure BIO-1 shall be implemented.

The remaining 48 special-status wildlife species are presumed to be absent from the property and adjacent land due to the lack of suitable habitat; proximity to the surrounding residential, commercial, and industrial development; and the presence of anthropogenic disturbances associated with the commercial and industrial development surrounding the site. No significant impacts to the 48 special-status wildlife species are anticipated to result from the development of the Proposed Project. The Peruvian pepper tree observed on the Project Site as well as the trees immediately adjacent to the Project Site could provide nesting habitat for nesting birds and raptors protected by the MBTA and California Fish and Game Code. Furthermore, the Project Site could provide nesting habitat for ground-nesting bird species. If construction of the Proposed Project occurs during the bird breeding season (typically February 1 through August 31), ground-disturbing construction activities could directly affect birds protected by the MBTA and their nests through the removal of habitat on the Project Site, and indirectly through increased noise, vibrations, and increased human activity. Therefore, Mitigation Measure BIO-2 shall be implemented to avoid any significant impacts to nesting birds.

Mitigation Measure BIO-1:

Preconstruction Burrowing Owl Surveys - Preconstruction surveys for burrowing owl shall be conducted. The surveys shall follow the methods described in the CDFW's Staff Report on Burrowing Owl Mitigation (California Department of Fish and Game [CDFG] 2012). Two surveys shall be conducted, with the first survey being scheduled between 30 and 14 days before initial ground disturbance (grading, grubbing, and construction), and the second survey being conducted no more than 24 hours prior to initial ground disturbance. If burrowing owls and/or suitable burrowing owl burrows are identified on the Project Site during the survey, the Project Proponent shall consult with CDFW and follow the methods listed in the CDFW's Staff Report on Burrowing Owl Mitigation (CDFG 2012) for avoidance and/or passive relocation. If burrowing owls or suitable burrowing owl burrows with sign (e.g., whitewash, pellets, feathers, prey remains) are identified on the Project Site during the survey, these features must be completely avoided. If impacts to those features are unavoidable, then the Project Proponent must also develop an owl mitigation plan in consultation with CDFW. Mitigation methods may include passive relocation conducted outside of the owl breeding season (between September 1 and February 28). If an active owl burrow is identified, and construction is to proceed, then a qualified biologist (with two or more years of burrowing owl experience) can establish an appropriate disturbance-limit buffer around the burrow using flagging or staking. Construction activities shall not

occur within any buffer zones until the burrow is deemed inactive by the qualified biologist.

Mitigation Measure BIO-2:

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

Implementation of Mitigation Measures BIO-1 and BIO-2 would ensure that potential impacts to candidate, sensitive or special status species are avoided by the project.

- b) **No Impact.** The Project Site consists of disturbed land that supports mostly non-native ruderal vegetation species. As stated in Biological Technical Report, the Project Site does not contain any riparian habitat or other sensitive natural communities that would need to be preserved. No impacts to sensitive natural communities are anticipated to result from the development of Proposed Project. No impacts are identified or anticipated, and no mitigation measures are required.
- c) **No Impact.** Jurisdictional waters and wetlands include waters of the U.S., including wetlands regulated by the U.S. Army Corps of Engineers (USACE) pursuant to the Clean Water Act (CWA) Section 404; waters of the State regulated by the Regional Water Quality Control Board (RWQCB) pursuant to Section 401 of the CWA and State Porter-Cologne Water Quality Control Act; and/or streambed and riparian habitat regulated by the CDFW pursuant to Sections 1600 et seq. of the CFG Code. The desktop review of the NRCS identified one hydric soil type on the site: Tujunga Gravelly Loamy Sand, 0 to 9 percent slopes. However, the National Wetland Inventory, National Hydrography Products, and USGS desktop map review did not identify any aquatic features within the Project Site. According to the results of the preliminary aquatic resources delineation, no state or federally protected wetlands or Waters of the U.S. were identified on the Project Site. Potential waters of the U.S., waters of the State, and CDFW jurisdictional habitat are not present within the Project Site. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

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

The Project Site is located within and adjacent to areas containing existing disturbances (e.g., paved roads and residential, commercial, and industrial development). The Project Site is disturbed and contains insufficient vegetative cover to facilitate wildlife movement and it is isolated from large, contiguous blocks of native habitat. No migratory wildlife corridors or native wildlife nursery sites were identified within the Project site. No impacts to these resources are expected to occur during the development of the Proposed Project. No significant impacts are identified or anticipated, and no mitigation measures are required.

- e) **Less than Significant.** Measure U is an adopted ballot measure that has been incorporated into the General Plan. In accordance with Measure U, the General Plan limits development potential in the Resource Preservation land use category in the eastern and southern canyon portions of the General Plan Planning Area.⁷ The Project Site is not designated for Resource Conservation and the Project Site is not located in the canyons. The General Plan requires that new development take actions to protect biological resources. As summarized above, the Proposed Project would not result in any significant impacts to biological resources with implementation of Mitigation Measures BIO-1 and BIO-2.

In addition, as a regulatory requirement, the project construction contractor would be required to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) that would include standard construction Best Management Practices (BMPs) and other measures to ensure appropriate site protections are in place during construction to prevent potential adverse effects on water quality and related resources. Implementation of Mitigation Measures BIO-1 and BIO-2, the project's SWPPP, and construction and operation BMPs would ensure that the Proposed Project would not conflict with the General Plan policies for biological resources. No significant impacts are identified or anticipated, and no additional mitigation measures are required.

- f) **No Impact.** The Project Site is not located within the boundaries of any adopted conservation plan. Therefore, no impact on any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan would occur. No impacts are identified or anticipated, and no mitigation measures are required.

⁷ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐
a) Less than Significant with Mitigation. A Cultural Resources Inventory and Evaluation Report was prepared for the Project Site in June 2022 by ECORP (see Appendix C for report). ECORP requested a records search for the property at the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System (CHRIS) at California State University, Fullerton. ECORP received the results of the records search of the CHRIS from the SCCIC on February 4, 2022. Twenty-six previous cultural resource investigations have been conducted within 1 mile of the property, covering approximately 10 percent of the total area surrounding the property within the record search radius. The previous studies were conducted between 1976 and 2010. The results of the records search indicate that none of the property has been previously surveyed for cultural resources. The records search determined that a total of 54 cultural resources were previously recorded within 1 mile of the Project Site: 51 historic-period cultural resources and three pre-contact cultural resources. One of the historic-period resources overlaps the Project Site.				
As a result of the field survey, ECORP updated one previously recorded resource (P-36-012351) within the Project Site and identified and recorded one new cultural resource (MW-001). These resources comprise an irrigation feature and a concrete pad, respectively. These resources were likely constructed and used when the Project Site was an active agricultural field. Significant cultural resources must meet at least one criteria that define eligibility for listing on either the California Register of Historical Resources (CRHR) or the National Register of Historic Places (NRHP). ECORP archaeologists have evaluated these resources as not eligible using NRHP and CRHR eligibility criteria, and not eligible for listing in the NRHP or CRHR under any criteria. Therefore, these finds are not considered Historical Resources under CEQA.				
The Built Environment Resources Directory for San Bernardino County lists three properties within 1 mile of the Project Site that were determined to be ineligible for the NRHP.				

There always remains the potential for ground-disturbing activities to expose previously unrecorded cultural resources. Therefore, the Mitigation Measure CR-1 shall be implemented to avoid potential significant impacts to historical resources:

Mitigation Measure CR-1:

If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for precontact and historic archaeologist, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:

- If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately, and no agency notifications are required.
- If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, the archaeologist shall immediately notify the lead federal agency, the lead CEQA agency, and applicable landowner. The agencies shall consult on a finding of eligibility and implement appropriate treatment measures, if the find is determined to be a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines or a Historic Property under Section 106 NHPA, if applicable. Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the site either: 1) is not a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines or a Historic Property under Section 106; or 2) that the treatment measures have been completed to their satisfaction.
- The San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed within TCR-1 below, regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.
- If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to SMBMI for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.

- b) **Less than Significant with Mitigation.** The Project Site contains Holocene alluvial deposits contemporaneous with human occupation of the region. Although ECORP archaeologists did not identify pre-contact resources during the field survey; however, there exists a moderate potential for buried pre-contact archaeological sites within the

Project Site due to the presence of Holocene alluvial deposits within the Project Site, the proximity of the Project Site to the Santa Ana River, and the presence of previously recorded pre-contact cultural resources within 1 mile of the Project Site. With implementation of Mitigation Measure CR-1 as described above, the Proposed Project would not result in potentially significant impacts to archaeological resources.

- c) **Less than Significant with Mitigation.** The discovery of human remains is always a possibility during ground-disturbing activities. Therefore, possible significant adverse impacts have been identified or anticipated and Mitigation Measure CR-2 is required as a condition of project approval to reduce these impacts to a less than significant level.

Mitigation Measure CR-2:

If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease. The archaeologist shall notify the San Bernardino County Coroner (per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California PRC, and AB 2641 will be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the Native American Heritage Commission (NAHC), which then will designate a Native American Most Likely Descendant (MLD) (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (§ 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (§ 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.

VI. ENERGY

Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
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Would the project:

- a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation?

☐	☐	☒	☐
--------------------------	--------------------------	-------------------------------------	--------------------------

- | | Potentially
Significant
Impact | Less than
Significant with
Mitigation | Less than
Significant | No
Impact |
|---|--------------------------------------|---|-------------------------------------|--------------------------|
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | ☐ | ☐ | ☒ | ☐ |

- a) **Less than Significant.**

Electricity

Southern California Edison (SCE) provides electricity to the area of Project Site. Currently, the existing Project Site is vacant and undeveloped. Therefore, development of the Proposed Project would cause a permanent increase in demand for electricity when compared to existing conditions. The CalEEMod model projected that the Proposed Project would consume 0.917 GWh annually. According to the California Energy Commission, the commercial sector of the Southern California Edison planning area consumed 34,3738.76 GWh of electricity in 2020.⁸ The increase in electricity demand from the project would represent a 0.003 percent of the overall 2020 SCE commercial consumption. Therefore, projected electrical demand would not significantly impact SCE's level of service.

Natural Gas

The Project Site is located within the service area of Southern California Gas (SoCal Gas). As CalEEMod does not include a "self-storage" as a defined land use sub-type, the "non-refrigerated warehouse no-rail" land use sub-type was applied to the model. Contrary to the CalEEMod-estimated natural gas demand for the Proposed Project, the Project Applicant has indicated that the Proposed Project would not require a connection to natural gas lines. Therefore, the Proposed Project would not significantly impact SoCal Gas's level of service.

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

- b) **Less than Significant.** As concluded above, the Proposed Project's total impact on regional energy supplies would be minor. The proposed leasing office would be required to comply with the California Building Code (CBC) and California Green Building Standards Code (CALGreen Code) pertaining to energy and water conservation standards in effect at the time of construction. The Proposed Project includes the development of 835 storage units and a 700-SF leasing office, neither of which would have significant demand for electricity. In addition, the Proposed Project would not require connection to natural gas lines. The Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and therefore no significant impacts are anticipated, and no mitigation measures are recommended.

⁸California Energy Commission. <https://ecdms.energy.ca.gov/Default.aspx>. Accessed April 15, 2022.

VII. GEOLOGY AND SOILS

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

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
a)				
i. Less Than Significant. The Project Site does not occur within an Alquist-Priolo Earthquake Fault Zone or San Bernardino County designated fault zone. ⁹ The nearest fault zone is the San Andreas Fault Zone, which is approximately 2 miles north of the Project Site. The Proposed Project would be required to comply with the California Building Code (CBC) requirements and all applicable statutes, codes, ordinances, and standards of the San Bernardino County Fire Department. Compliance with these codes and standards would address potential impacts resulting from an earthquake event. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.				
ii. Less Than Significant. As is the case for most areas of Southern California, ground shaking resulting from earthquakes associated with nearby and more distant faults may occur at the Project Site. The design of any structures on-site would incorporate measures to accommodate projected seismic ground shaking in accordance with the CBC and local building regulations. The CBC is designed to preclude significant adverse effects associated with strong seismic ground shaking. Compliance can ensure that the Proposed Project would not expose people or structures to substantial adverse effects, including loss, injury or death, involving seismic ground shaking. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.				
iii. Less Than Significant. Liquefaction is a process whereby strong earthquake shaking causes sediment layers that are saturated with groundwater to lose strength and behave as a fluid. Ground failure associated with liquefaction can result in severe damage to structures. The Project Site is not located in an area susceptible to liquefaction. ¹⁰ Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.				
iv. No Impact. The Project Site is not located within an area susceptible to landslides. ¹¹ The property and its immediate surroundings are relatively flat and level. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.				
b) Less than Significant. Construction activities could result in soil erosion if the Project Site is not properly designed. The potential impacts of soil erosion would be minimized through				

⁹ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.6-2: Faults.

¹⁰ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.6-4: Liquefaction Susceptibility.

¹¹ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.6-3: Landslide Potential.

the preparation and implementation of a Storm Water Pollution and Prevention Plan (SWPPP). The SWPPP would prescribe temporary Best Management Practices (BMPs) to control wind and water erosion during and shortly after the construction of the proposed Project. Under proposed conditions, the Project Site would be developed with impervious surface and landscaping, thereby reducing the potential for soil erosion. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

- c) **Less than Significant.** The Project Site is relatively flat with no prominent geologic features. The Project Site is not within an area susceptible to landslides.¹² As stated above, the potential for liquefaction at the Project Site is very low. Because of the site's relatively flat topography and low liquefaction potential, it would not be susceptible to lateral spreading. In addition, the Proposed Project would be required to comply with the CBC. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.
- d) **Less than Significant.** Expansive soils (shrink-swell) are fine grained clay soils generally found in historical floodplains and lakes. Expansive soils are subject to swelling and shrinkage in relation to the amount of moisture present in the soil. Soil types within the Project Site consists of Hanford coarse sandy loam (HaC) and Tujunga gravelly loamy sand (TvC).¹³ Loamy soils are usually a very stable soil that shows little change with the increase or decrease of moisture temperature.¹⁴ Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.
- e) **No Impact.** The Proposed Project would connect to the City's existing sewer line along Wabash Avenue. No septic tanks or alternative wastewater disposal are proposed. No impacts are identified or are anticipated, and no mitigation measures are required.
- f) **Less Than Significant with Mitigation.** Paleontological resources, including fossils, have been found in the Redlands area, and there is potential for paleontological finds to occur in remaining, unexcavated open space areas within and adjacent to the City.¹⁵ These resources are found in geologic strata conducive to their preservation, typically sedimentary formations. Paleontological resources have been identified in San Timoteo Canyon area in the past. The Project Site is located approximately 5 miles northeast of San Timoteo Canyon. The general area of the Project Site is developed and consists of residential, commercial, and light industrial uses. In the event that paleontological resources are discovered, the following mitigation measure shall be implemented:

¹²Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.6-3: Landslide Potential.

¹³ ECORP Consulting, Inc. Biological Technical Report. January, 2022.

¹⁴ <https://www.foundationrepaiofca.com/foundation-repair/foundation-problems/settlement-sinking/foundation-soils.html>

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

Mitigation Measure GEO-1:

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

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

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	☐	☐	☒	☐
b) Conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing the emissions of greenhouse gases.	☐	☐	☒	☐
a) Less than Significant. Emissions were estimated using CalEEMod version 2022.1 with construction anticipated to begin in 2023 and be completed in 2024. The CalEEMod defaults were used for other parameters which are used to estimate construction emissions, such as the worker and vendor trips and trip lengths. The operational mobile emissions were calculated using CalEEMod with the vehicle trip generation estimates from the Traffic Circulation & VMT Impact Assessment, dated August 9, 2022, prepared for the Proposed Project by Linscott Law & Greenspan. It was determined that the Proposed Project will generate approximately 189 total daily trips.				

Many gases make up the group of pollutants which contribute to global climate change. However, three gases are currently evaluated and represent the highest concentration of GHG: Carbon dioxide (CO₂), Methane (CH₄), and Nitrous oxide (N₂O). On December 5, 2017, the City of Redlands adopted a Climate Action Plan (CAP), to focus on adaptive GHG measures that reduce emissions through standard practice measures and help prepare the City for the impacts of climate change. The CAP does not itself establish a numeric threshold of significance for determining impacts with respect to GHG emissions, however the City has utilized a screening threshold of 3,000 metric tons of carbon dioxide equivalent

(MTCO_{2e}) per year to determine if a potential GHG related impact would occur from a project. The Proposed Project's emissions were compared to SCAQMD draft screening threshold of 3,000 metric tons CO_{2e}. A summary of the results is shown below in Table 6 and Table 7.

Table 6
Greenhouse Gas Construction Emissions
(Metric Tons per Year)

Source/Phase	CO ₂	CH ₄	N ₂ O	R ¹
2023	459	0.0	0.0	0.3
2024	63.1	0.0	0.0	--
Total (MTCO_{2e})	529.3			
Construction Amortized 30 Years	17.6			

Source: CalEEMod.2022.1 Annual Emissions.

1) Common refrigerant GHGs used in air conditioning and refrigeration equipment.

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

Source/Phase	CO ₂	CH ₄	N ₂ O	R ¹
Mobile	328	0.0	0.0	0.6
Area	4.4	0.0	0.0	--
Energy	327	0.0	0.0	--
Water	58.9	1.4	0.0	--
Waste	15.1	1.5	0.0	--
Refrigeration	--	--	--	545
Construction Amortized 30 Years	17.6			
Total (MTCO_{2e})	1,384.6			
SCAQMD Threshold	3,000			
Significant	No			

Source: CalEEMod.2022.1 Annual Emissions.

1) Common refrigerant GHGs used in air conditioning and refrigeration equipment.

As shown in Table 6 and Table 7, the Proposed Project's emissions would not exceed SCAQMD's draft screening threshold and the City's threshold of significance.

- b) **Less than Significant.** The SCAQMD's thresholds used the California Governor Executive Order S-3-05 goals as the basis for deriving the screening level. The Proposed Project's emissions meet the threshold for compliance with Executive Order S-3-05, the Proposed Project's emissions also comply with the goals of AB 32. Additionally, as the Proposed Project meets the current interim emissions targets/thresholds established by the SCAQMD (as described in Section III. Air Quality of this Initial Study), the Proposed Project would also be on track to meet the reduction target of 40 percent below 1990 levels by 2030 as mandated by SB 32. Furthermore, all of the post-2020 reductions in GHG emissions are addressed via regulatory requirements at the State level and the Proposed Project will be required to comply with these regulations as they come into effect. As

discussed, the Proposed Project's GHG emissions fall below the Tier 3 SCAQMD draft screening threshold of 3,000 metric tons of CO₂ equivalent per year and the Proposed Project is in compliance with the reduction goals AB 32 and SB 32. Furthermore, all of the post-2020 reductions in GHG emissions are addressed via regulatory requirements at the State level and the Proposed Project will be required to comply with these regulations as they come into effect.

The CAP quantifies existing and projected GHG emissions in the General Plan Planning Area through horizon year 2035 resulting from activities within the General Plan Planning Area and the region, and it includes GHG emissions reduction targets for the year 2035. The CAP did not identify any required measure to achieve the emission targets. The Draft EIR for the Redlands General Plan and CAP determined that the General Plan would meet all State-mandated emissions targets through 2035. As the Proposed Project would be consistent with the Project Site's land use designation of Commercial, it would not conflict with the CAP. Therefore, construction and operation of the Proposed Project will not conflict with any applicable plan, local or regional greenhouse gas plans. No significant impacts are identified or anticipated, and no mitigation measures are required.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a) Create a significant hazard to the public or the Environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard	☐	☐	☐	☒

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
or excessive noise for people residing or working in the project area?				
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐
a, b) Less Than Significant. The Proposed Project includes the construction and operation of a self-storage facility and would not require the routine transport, use, storage, and disposal of limited quantities of common hazardous materials such as gasoline, diesel fuel, oils, solvents, paint, fertilizers, pesticides, and other similar materials. Operations would include standard maintenance (i.e., landscape upkeep, exterior painting and similar activities) involving the use of commercially available products (e.g., pesticides, herbicides, gas, oil, paint, etc.) the use of which would not create a significant hazard to the public. All materials required during construction would be kept in compliance with State and local regulations and BMPs. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.				
c) No Impact. The nearest school to Project Site is Redlands East Valley High School, approximately 0.3-mile southeast of the Project Site. No schools exist within 1/4-mile of the Project Site. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.				
d) No Impact. The Project Site is not included on a list of hazardous material sites as compiled pursuant to Government Code Section 65962.5 and reported in the EnviroStor database. ¹⁶ Therefore, no impacts are identified or anticipated, and no mitigation measures are required.				
e) No Impact. The nearest airport to the Project Site is the Redlands Municipal Airport, which is located approximately 0.8-mile north of the Project Site. The Project Site is not located within any Airport Compatibility Zone. ¹⁷ Therefore, no impact is identified or anticipated, and no mitigation measures are required.				

¹⁶ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.7-1: Hazardous Material Site.

¹⁷ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.7-2: Airport Hazards.

- f) **Less than Significant.** The Project Site does not contain any critical facilities.¹⁸ It is adjacent to Naples Avenue, Jasper Avenue, and Wabash Avenue, which are not evacuation routes.¹⁹ Access to the Project Site would be provided by two proposed driveways: one from Jasper Avenue and one from Wabash Avenue. Entries to the storage units would be gated. Additionally, the California Emergency Services Act requires the City to manage and coordinate the overall emergency and recovery activities within its jurisdictional boundaries. The City's Emergency Operations Plan includes policies and procedures to be administered by the City in the event of a disaster. During disasters, the City of Redlands is required to coordinate emergency operations with the County of San Bernardino. Policies within the City's General Plan and updates to the City's Emergency Plan, as required by State law, would ensure the Proposed Project would not interfere with adopted policies and procedures. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.
- g) **Less than Significant.** The Project Site is located in an area with moderate threat to fire hazards.²⁰ It is not located within a High or Very High Fire Hazard Severity Zone. The property is located in a developed area with residential, commercial, and industrial uses. The Project Site is not located adjacent to or near wildlands. The proposed development would replace the existing vegetation onsite with impervious surface, buildings with fire safety and fire suppression design elements, and proper landscaping, thereby reducing the risk of wildfire. Development of the Proposed Project shall comply with the California Fire Code. Therefore, the Proposed Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. No significant impacts are identified or anticipated, and no mitigation measures are required.

X. HYDROLOGY AND WATER QUALITY

Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede substantial groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a	☐	☐	☒	☐

¹⁸ San Bernardino County. Countywide Policy Plan web maps: PP-1 "Critical Facilities." Accessed June 20, 2022.

¹⁹ San Bernardino County. Countywide Policy Plan web maps: PP-2 "Evacuation Routes." Accessed June 20, 2022.

²⁰ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.7-3: Fire Hazards and Fire Safety Services.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;				
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;				
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				
iv) impede or redirect flood flows?				
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or substantial groundwater management plan?	☐	☐	☒	☐

- a) **Less than Significant.** The Proposed Project would disturb an approximate 6.34-acre site and would therefore be subject to the National Pollutant Discharge Elimination System (NPDES) permit. The State of California is authorized to administer various aspects of the NPDES. Construction activities covered under the State's General Construction permit include the removal of vegetation, grading, excavating, or any other activity that causes the disturbance of one acre or more. The General Construction permit requires recipients to reduce or eliminate non-storm water discharges into stormwater systems, and to develop and implement a SWPPP. The SWPPP is based on the principles of Best Management Practices (BMPs) to control and abate pollutants. The SWPPP must include BMPs to prevent project-related pollutants from impacting surface waters. The purpose of a SWPPP is to: 1) identify pollutant sources that may affect the quality of discharges of storm water associated with construction activities; and 2) identify, construct and implement storm water pollution control measures to reduce pollutants in storm water discharges from the construction site during and after construction.

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

- b) **Less Than Significant.** The Project Site is located within the City of Redlands water service area. Redlands' water supply is comprised primarily of surface water from the Santa Ana River (SAR) and Mill Creek and supplemented by groundwater extracted from the Bunker Hill Basin (part of the San Bernardino Basin) and Yucaipa Basin and a small amount of imported water when needed.²¹

The Urban Water Management Plan for City of Redlands is based on projected growth included in General Plans for areas within their service area. The Project Application includes an Ordinance Text Amendment to add "Self-storage with a minimum of 5 acres or more" as a use that requires a Conditional Use Permit (CUP) in the C-4 District. Although the Proposed Project requires an Ordinance Text Amendment, the proposed self-storage facility includes less water-intensive uses than the current C-4 district permitted uses, such as motels, retail stores, commercial greenhouses, etc. Therefore, the Proposed Project water demand is already anticipated in buildout projections of the General Plan Planning Area and incorporated into the Urban Water Management Plan.

Moreover, implementation of the project Best Management Practices (BMPs) would ensure that stormwater discharge does not substantially alter the existing drainage pattern and water quality, thereby allowing runoff from the Project Site to be utilized as a resource that can eventually be used for groundwater recharge. Therefore, the Proposed Project is not anticipated to have a substantial impact on groundwater supplies or interfere substantially with groundwater recharge. No significant impacts are identified or anticipated, and no mitigation measures are required.

- c) i) **Less than Significant.** Erosion is the wearing away of the ground surface as a result of the movement of wind or water, and siltation is the process by which water is affected by fine mineral particles in the water. Soil erosion could occur due to a storm event. The Construction General Permit requires the development and implementation of a SWPPP. The SWPPP must list BMPs to avoid and minimize soil erosion. Adherence to BMPs would prevent substantial soil erosion or the loss of topsoil. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

ii, iii, iv)

Less than Significant. As stated in the WQMP, project flows from off-site areas and perimeter landscape areas within the drainage area are collected in drainage swales around the site perimeter and are conveyed through a storm drain system to two infiltration basins. The proposed buildings (storage units and leasing office) and parking lot/drive aisles would drain to a series of trench drain and catch basin inlets that all outlet through a storm drain system into the infiltrations basins for treatment. The outlet from the infiltration basins is a concrete curb drain spillway that drains to Wabash Avenue adjacent to the Project Site.

A Hydrology and Hydraulics preliminary report, prepared in January 2022 and updated in July 2022, was prepared for the Proposed Project by Hicks & Hartwick, Inc. (see

²¹ Water Systems Consulting, Inc. and Woodard & Curran. 2020 Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan.

Appendix E for report). The report covers both the existing and proposed drainage conditions. The study watershed includes the Project Site, the RV storage facility to the east and a portion of the RV storage facility to the south.

The Proposed Project would convey the runoff through a basin and discharge into Wabash Avenue. The Proposed Project would cover the Project Site with impervious surface, thereby increasing the peak runoff flowrate and reducing the time of concentration. However, the Proposed Project basin will mitigate increases in peak run-off generated from the project development to less than or equal to 90% of the pre-development peak flow rate from the site. The Proposed Project would decrease total discharge from the Project Site from 47.4 cubic-feet-per second (CFS) to 45.4 CFS. Therefore, the Proposed Project would not result in impacts to downstream street capacities, properties, and facilities.

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

- d) **Less Than Significant.** Due to the inland distance from the Pacific Ocean and any other significant body of water, tsunamis and seiches are not potential hazards at the site. The Project Site is neither located within a 100-year floodplain nor a 500-year floodplain.²² Therefore, the risk of release of pollutants due to project inundation is low. No significant impacts are identified or anticipated, and no mitigation measures are required.
- e) **Less than Significant.** Requirements of a NPDES permit to be issued for the Proposed Project would include development and implementation of a SWPPP and is subject to RWQCB review and approval. The purpose of an SWPPP is to: 1) identify pollutant sources that may affect the quality of discharges of stormwater associated with construction activities; and 2) identify, construct and implement stormwater pollution control measures to reduce pollutants in stormwater discharges from the construction site during and after construction. The SWPPP would include BMPs to control and abate pollutants, and treat runoff that can be used for groundwater recharge. The Proposed Project would not otherwise substantially degrade water quality as appropriate measures relating to water quality protection would be implemented. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

XI. LAND USE AND PLANNING

Would the project:

- a) Physically divide an established community?

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

²² Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.9-2 "Flood Hazards."

- b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? ☐ ☐ ☒ ☐
- a) **No Impact.** The physical division of an established community is typically associated with construction of a linear feature, such as a major highway or railroad tracks, or removal of a means of access, such as a local road or bridge, which would impair mobility in an existing community or between a community and an outlying area. The Proposed Project does not include the construction of a linear feature and is not within a defined neighborhood area, and the Project Site is currently vacant. Therefore, the Proposed Project would neither physically divide an established community nor cause a significant environmental impact due to conflict with any land use plans or policies. No impacts would occur, and no mitigation measures are required.
- b) **Less Than Significant.** The Project Site is currently undeveloped. It is designated Commercial and has a zoning of Highway Commercial (C-4). The purpose of the C-4 zone is to provide for the development of commercial enterprises adjacent to the major thoroughfares of the community. The Proposed Project is development of a self-storage facility with 11 buildings to include 835 units and a leasing office. The Project Application includes an Ordinance Text Amendment to add "Self-storage with a minimum of 5 acres or more" as a use that requires a Conditional Use Permit (CUP) in the C-4 District. The Proposed Project would be subject to the development standards required for uses within the C-4 District. Therefore, the Proposed Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No significant impacts are identified or anticipated, and no mitigation measures are required.

XII. MINERAL RESOURCES

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

- a, b) **Less than Significant.** The Project Site is located within a Mineral Resource Zone-2 (MRZ-2).²³ MRZ-2 are areas where geologic data indicate that significant PCC-Grade aggregate resources are present. The Project Site is located in a developed area of the city with residential, commercial, and light industrial uses. The Project Site is surrounded by development on all sides: residential and commercial uses to the north, an RV storage facility to the south, an RV storage facility to the east, and residential development and commercial shopping center to the west. The surrounding uses make the site unsuitable for mineral resources extraction. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

XIII. NOISE

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐
a) Less than Significant. The unit of measurement used to describe a noise level is the decibel (dB). The human ear is not equally sensitive to all frequencies within the sound spectrum. Therefore, the “A-weighted” noise scale, which weights the frequencies to which humans are sensitive, is used for measurements. Noise levels using A-weighted measurements are written dB(A) or dBA.				

Construction

The City’s Municipal Code Sections 8.06.120 (G) and 8.06.090 limit the hours of construction to between the hours of 7:00 AM and 6:00 PM, including Saturdays, with no

²³ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.11-1: Mineral Resources.

activities taking place at any time on Sundays or federal holidays. Per the EIR prepared for the City of Redlands General Plan (2019), a substantial temporary increase in ambient noise levels from construction noise would be considered less than significant if construction activities comply with the City's Noise Control Ordinance in the Municipal Code, Section 8.06.090. Project construction will not occur outside of the hours outlined as "exempt" in City's Municipal Code Sections 8.06.120 (G) and 8.06.090; and therefore, will not result in a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance. Impacts would be less than significant.

Operation

The Proposed Project is the development of a self-storage facility to include a leasing office. The proposed office space is not anticipated to generate any significant noise. The primary source of noise generated by the Proposed Project is on-site traffic. Noise levels associated with the operation of the Proposed Project are not expected to be significant as the Proposed Project is anticipated to generate approximately 189 trips per day with 12 AM peak hour trips and 20 PM peak hour trips. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

- b) **Less than Significant.** Groundborne vibration and groundborne noise could originate from earth movement activities during the construction phase of the Proposed Project. Ground-borne vibration levels resulting from construction activities occurring at the Project Site would be temporary and construction activities would generate low levels of ground-borne vibration within the Project Site include grading. The City's Municipal Code Sections 8.06.120 (G) and 8.06.090 limit the hours of construction to between the hours of 7:00 AM and 6:00 PM, including Saturdays, with no activities taking place at any time on Sundays or federal holidays. Therefore, the vibration impacts due to Project construction are anticipated to result in less than significant impacts regarding exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.
- c) **Less Than Significant.** The nearest airport to the Project Site is the Redlands Municipal Airport, which is located approximately 0.8-mile north of the Project Site. The Project Site is not located within any Airport Compatibility Zone. Therefore, the Proposed Project would not expose people residing or working in the project area to excessive noise levels. No significant impacts are identified or anticipated, and no mitigation measures are required.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
a) Less Than Significant. Construction of the Proposed Project would not be expected to attract a substantial number of new employees to the area since there is an existing pool of construction labor in Redlands and surrounding cities. In 2019, the City was estimated to have 1,662 construction laborers and San Bernardino County was estimated to have 68,852 construction laborers.²⁴ Construction activities would be temporary and would not attract new employees to the area. The Project Application includes an Ordinance Text Amendment to add "Self-storage with a minimum of 5 acres or more" as a use that requires a Conditional Use Permit (CUP) in the C-4 District. The Proposed Project includes 123,456 square-feet (SF) of building coverage, of which 700 SF is proposed as office space. The Proposed Project would require at most two employees, based on one employee per 697 SF of office area.²⁵ In contrast, a retail development with the same building coverage would require approximately 122 employees.²⁶ Employment in the City is anticipated to increase by approximately 15,521 jobs between 2016 and 2035.²⁷ The Proposed Project would represent approximately 0.01% of the City's projected employment growth between 2016 and 2035. Therefore, it would not induce substantial unplanned population growth within the City. No significant adverse impacts are identified or anticipated, and no mitigation measures are required.				
b) No Impact. The Project Site is currently undeveloped. Implementation of the Proposed Project would neither displace existing housing nor require construction of replacement housing elsewhere. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.				

²⁴ U.S. Census Bureau. 2019: ACS 5-Year Estimates Data Profiles.

²⁵ The Natelson Company, Inc. Employment Density Study. October 31, 2001. For San Bernardino County, the average square-feet per employee is 1,009.

²⁶ The Natelson Company, Inc.. Employment Density Study. October 31, 2001.

²⁷ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.

XV. PUBLIC SERVICES

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

Fire Protection?	☐	☐	☒	☐
Police Protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other Public Facilities?	☐	☐	☒	☐

a)

Fire Protection

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

Currently, only 34 percent of the city is within an Effective Response Force (ERF) during congested periods. The Fire Department will be able to improve service levels with the addition of two new fire stations and the relocation of a third. This will increase the four-minute service response time by 60 percent, providing an improvement in the ability of first responders to reach areas within the community that are currently outside of a four-

minute response time window. San Bernardino County Fire Station 9, located at 1300 Crafton Avenue, is located approximately 0.8-mile east of the Project Site. Average travel time between County Fire Station 9 and the Project Site is approximately two minutes.²⁸ Automatic aid provided by Station 9 to the City of Redlands is a contractual arrangement that ensures the best outcome for the patient and/or reduced property loss. This agreement is designed to have reciprocity and cooperation among fire agencies and can be rescinded if reciprocity is not achieved. Redlands Fire Department responds to multiple calls at one time (2 or more) 13.83 percent of the time. This is a significant percentage of calls that continues to rise based on the current fire and EMS defense system in the City.

Development of the Proposed Project may insignificantly increase the demand for fire protection services as it could increase the local area's employee population by approximately two people. The Proposed Project is required to meet minimum fire safety requirements of Title 24 which helps to support fire suppression activities, including building construction, automatic fire sprinkler systems, fire hydrants, and paved fire access. The City's Fire Department and the Building Division enforce fire safety standards during review of building plans and inspections. Development impact fees (DIF) are collected at the time of building permit issuance and would increase funding to assist in reducing impacts to fire protection services. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation are required.

Police Protection

Less than Significant. The City of Redlands Police Department (RPD) provides police protection for the Project Site and vicinity. The service ratio for the City is 1.1 officers per 1,000 residents. Though the City does not have a service ratio standard, the City recognizes that its ratio falls below the national average of 2.1, and that hiring additional officers would be optimal.²⁹ In 2015, the RPD had an average response time of 6.5 minutes for police services. Although there are no industry standards for response time to emergency calls, according to the City of Redlands, a response time of 4.5 minutes is desirable in a city of Redlands' size. Development of the Proposed Project may incrementally increase the demand for police protection services due to the increased local employee population. In its review of new development plans, the RPD evaluates project plans on its ability to provide proper police protection to the development. Additionally, the proponent of the Proposed Project would be required to pay service fees and DIF to the RPD. The DIF would be used to fund capital costs associated with acquiring land for new police stations, constructing new police stations, purchasing crime-fighting equipment for new police stations, and providing for additional staff as needed and as identified by the City. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

²⁸ Timing is based on passenger-car travel and is therefore conservative.

²⁹ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.

Schools

Less than Significant. The Redlands Unified School District (RUSD) provides public schools in the General Plan Planning Area, which includes the Project Site. Construction and operation of new school facilities would be funded through school impact fees assessed on new developments that occur within the school district. The Proposed Project is not anticipated to substantially increase population growth within the area, as the future employees would likely come from the local area (see XIV-a above), and therefore would not generate new students. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Parks

Less than Significant. The Redlands Parks Division currently operates 18 parks.³⁰ Implementation of the Proposed Project would not induce residential development and would not significantly increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of any facilities would result. Additionally, collection of DIF would ensure no significant impacts to parks would occur. The Redlands Municipal Code provides for open space and park fees (i.e. DIF) to be imposed as a condition of approval of new residential, commercial, and office and industrial development (Chapter 3.32). The DIF are intended to ensure that open space lands and active and passive parks are made available to the public concurrent with the need for such lands and parks caused by new development. They may be used to pay for costs incurred by the City for acquiring, developing, improving, and expanding open space areas, scenic drives, parks, playgrounds, and recreational facilities to meet the increased needs for those facilities resulting from the effects of new development. Collection of the DIF would ensure no significant impacts to parks would occur. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Other Public Facilities

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

³⁰ City of Redlands. City-Owned and Operated Parks. <https://www.cityofredlands.org/parks>. Accessed August 9, 2022.

public facilities would occur. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

XVI. RECREATION

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

XVII. TRANSPORTATION

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian facilities?	☐	☐	☒	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐
a) Less Than Significant. A Traffic Circulation & VMT Impact Assessment, dated August 9, 2022, was prepared for the Proposed Project by Linscott, Law & Greenspan (see Appendix F for report). The Proposed Project is forecast to generate 189 daily trips, with 12 trips (6 inbound, 6 outbound) produced in the AM peak hour and 20 trips (10 inbound, 10 outbound) produced in the PM peak hour on a “typical” weekday. The Connected City theme of the General Plan promotes an efficient and integrated circulation system by enhancing the vehicular, biking, walking, and transit networks. The following analysis details project consistency with the applicable Connected City proposed actions:				

5-A.14: Close the gaps in the sidewalk network where streets are built out but sidewalks are not complete.

Consistency: The segments of Wabash Avenue, Naples Avenue, and Jasper Avenue adjacent to the Project Site are currently missing sidewalks. The Proposed Project would provide landscaped sidewalks along the sections.

5-A.15: Maintain access for emergency vehicles and services by providing two means of ingress/egress into new communities, limitations on the length of cul-de-sacs, proper roadway widths and road grades, adequate turning radius, and other requirements per the California Fire Code.

Consistency: Access for the Proposed Project will be provided via one (1) 30-foot driveway located along Wabash Avenue and 1 30-foot driveway located along Jasper Avenue. Recreational vehicles and small moving vans (i.e. U-Haul, etc.) will be able to adequately circulate throughout the site. The driveway width has been confirmed and are generally adequate for large pick-up trucks and small moving vans.

5-A.24: Use the City’s Bicycle Master Plan as the primary resource for planning and implementing bikeway improvements.

5-A.26: Implement bicycle and trail improvements that provide strong north-south connections, especially with major eastwest trails, including routes on Mountain View Avenue, California Street, Nevada Street, Alabama Street, Texas Street, New York Street, Orange Street, Church Street, Dearborn Street, and Wabash Avenue.

Consistency: The portion of Wabash Avenue adjacent to the Project Site is a proposed future bike route.³¹ The Proposed Project would dedicate 4 feet to the right-of-way along Wabash Avenue, which would allow for future bicycle and trail improvements along that street.

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

Consistency: Access to the Proposed Project would be provided by two gated driveways, one along Wabash Avenue and the other along Jasper Avenue. The Proposed Project is required to provide a minimum of 4 parking stalls. The Project Applicant would provide 5 parking stalls.

5-A.53: Allow the City Engineer to require additional right-of-way and pavement width for local and collector roads in the Commercial, Commercial/Industrial, Light Industrial, and Public/Institutional land use designations based on existing street sections, traffic volumes, and truck traffic.

Consistency: The Project Site is designated Commercial. Wabash Avenue adjacent to the Project Site is identified as a minor arterial road. Jasper Avenue adjacent to the Project Site is identified as a local road.³² The Proposed Project includes a Street vacation to vacate 3 feet on Jasper Avenue. With this street vacation, the Jasper Avenue right-of-way would be 63 feet wide. Local streets are two-lane roads with 60 feet dedicated to the right-of-way.³³ Therefore, the requested street vacation would neither conflict with Jasper Avenue’s street classification.

5-A.68: Provide for direct pedestrian paths and access from new developments to the nearest public transportation stop.

Consistency: OmniTrans Bus Route #8 includes a bus stop on the intersection of Lugonia Avenue and Wabash Avenue, approximately 500 feet north of the Project Site.

³¹ Dyett and Bhatia. City of Redlands General Plan 2035. Adopted December 5, 2017. Figure 5-3: “Bicycle Facilities.”

³² Dyett and Bhatia. City of Redlands General Plan 2035. Adopted December 5, 2017. Figure 5-5: “Roadway Classification.”

³³ Dyett and Bhatia. City of Redlands General Plan 2035. Adopted December 5, 2017. Figure 5-6: “Illustrative Street Sections.”

The Proposed Project would provide sidewalks along Project Site frontage on Wabash Avenue, Naples Avenue, and Jasper Avenue.

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

- b) **Less than Significant.** The approach and methodology outlined in the VMT Assessment is based on the City of Redlands CEQA Assessment VMT Analysis Guidelines and is generally consistent with the Technical Advisory for Evaluating Transportation Impacts In CEQA, published by the Governor's Office of Planning and Research (OPR). The City of Redlands has developed SB 743 VMT Impact Screening Criteria to serve as a screening tool for potential VMT impacts associated with select land use projects in the city.

Small project screening applies to projects with low trip generation per CEQA exemptions or results in a 3,000 Metric Tons of Carbon Dioxide Equivalent (MTCO₂e) per year screening level threshold, based on the County of San Bernardino's Climate Action Plan and South Coast Air Quality Management District's draft interim guidance for assessing project-level greenhouse gas impacts. Since the Proposed Project consists of mini-warehousing of 123,456 SF, which is less than the "Small Projects" (< 3,000 MT CO₂e) threshold of 463,600 square feet, this project could be screened from a VMT analysis and would not have a significant transportation related CEQA impact. No significant impacts are identified or anticipated, and no mitigation measures are required.

- c) **Less than Significant.** The Project Site is not adjacent to windy roads or dangerous intersections. The Proposed Project is development of a self-storage facility. It does not include a geometric design or incompatible uses that would substantially increase hazards. The Proposed Project would be compatible with the surrounding commercial and light industrial uses, and does not include uses that would be obtrusive to the nearby residential uses. The Proposed Project is required to provide a minimum of four parking stalls; the Proposed Project would provide five. The on-site circulation layout of the Proposed Project would provide adequate spacing for reciprocal access. Recreational vehicles and small moving vans (i.e. U-Haul, etc.) will be able to adequately circulate throughout the site, thereby ensuring that project vehicles do not park off-site and interfere with external traffic. Roadway frontage improvements would be designed and constructed to satisfy all City requirements for street widths, corner radii, and intersection control, as well as incorporate design standards tailored specifically to site access requirements. The Site Plan is subject to approval by the City of Redlands Fire Department. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

- d) **Less than Significant.** Access for the Proposed Project will be provided via 1 30-foot driveway located along Wabash Avenue and 1 30-foot driveway located along Jasper Avenue. Recreational vehicles and small moving vans (i.e. U-Haul, etc.) will be able to adequately circulate throughout the site. The driveway width has been confirmed and are generally adequate for large pick-up trucks and small moving vans. The proposed internal driveways would be at least 26-feet throughout the Project Site. The on-site circulation

layout of the Proposed Project would provide adequate spacing for reciprocal access. The Proposed Project includes a Street vacation to vacate 3-feet on Jasper Avenue. With this street vacation, the Jasper Avenue right-of-way would be 63-feet wide. As stated previously, the segment of Jasper Avenue adjacent to the Project Site is identified as a local road. Local streets are two-lane roads with 60-feet dedicated to the right-of-way.³⁴ Therefore, the requested street vacation would neither conflict with Jasper Avenue's street classification nor interfere with circulation along that road. During construction, the contractor would be required to maintain adequate emergency access for emergency vehicles. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

XVIII. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is?				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or?	☐	☒	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☒	☐	☐
a) i) Less Than Significant with Mitigation. A Cultural Resources Inventory and Evaluation Report was prepared for the Project Site in June 2022 by ECORP. A records search of the California Historical Resources Information System at the South Central Coastal Information Center indicated that no previous cultural resource studies have been				

³⁴ Dyett and Bhatia. City of Redlands General Plan 2035. Adopted December 5, 2017. Figure 5-6: "Illustrative Street Sections."

conducted within the Project Site. Twenty-six studies have been conducted within 1 mile of the Project Site. Fifty-four cultural resources were previously recorded within 1 mile of the Project Site. One previously recorded resource, P-36-012351, Wingate Ranch, extends into the Project Site. A search of the Sacred Lands File was completed by the California Native American Heritage Commission and resulted in a positive finding, indicating that Native American Sacred Lands have been recorded in the Project Site. As a result of the field survey, one historic-period cultural resource was recorded inside the Project Site: MW-001, a concrete pad associated with agriculture. Resource P-36-012351 and newly identified resource MW-001 have both been evaluated as not eligible for the NRHP or the CRHR under any criteria. Due to the presence of Holocene sediments within the Project Site, there is a moderate potential for the discovery of subsurface deposits or eligible sites within the Project Area. With implementation of Mitigation Measure CR-1, potential impacts to tribal cultural resources are anticipated to be less than significant.

- ii) **Less Than Significant with Mitigation.** California Assembly Bill 52 (AB52) was approved by Governor Brown on September 25, 2014. AB52 specifies that CEQA projects with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource may have a significant effect on the environment. As such, the bill requires lead agency consultation with California Native American tribes traditionally and culturally affiliated with the geographic area of a proposed project, if the tribe requested to the lead agency, in writing, to be informed of proposed projects in that geographic area. The legislation further requires that the tribe-requested consultation be completed prior to determining whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project.

On April 11, 2022, the City provided notification to the following tribes in accordance with AB52: the Gabrieleno Band of Mission Indians – Kizh Nation (Gabrieleno), Soboba Band of Luiseno Indians (Soboba), Yuhaaviatam of San Manuel Nation (SMBMI), Torres Martinez Desert Cahuilla Indians, and Morongo Band of Mission Indians.

In an email dated May 9, 2022, SMBMI indicated that the Project Site exists within Serrano ancestral territory and is therefore of interest to the Tribe. However, SMBMI did not have any concerns with the project's implementation, at the time of writing the email. The Tribe requested that the following mitigation measures be incorporated:

Mitigation Measure TCR-1:

The San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed in CR-1, of any pre-contact and/or historic-era cultural resources discovered during project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a cultural resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with SMBMI, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that

represents SMBMI for the remainder of the project, should SMBMI elect to place a monitor on-site.

Mitigation Measure TCR-2:

Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to SMBMI. The Lead Agency and/or applicant shall, in good faith, consult with SMBMI throughout the life of the project.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

- a) **Less Than Significant.** The Project Site is located within the City of Redlands water and sewer service areas. The Proposed Project would connect to the existing 20-inch water lines along Wabash Avenue and to the existing 18-inch sewer line along Wabash Avenue.

The Proposed Project would be serviced by Southern California Edison (SCE), which provides electrical service to the general area. There is an existing electric and telephone pole at the intersection of Naples Avenue and Chrysolite Avenue that the Proposed Project will connect to.

There are existing Southern California Gas (SoCal) gas lines along Wabash Avenue. However, the Project Applicant has indicated that no connection is necessary for the Proposed Project.

The Proposed Project would convey the project runoff to a proposed infiltration basin before discharging to the existing drainage facilities along Wabash Avenue.

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

- b) **Less than Significant.** The Project Site is located within the City of Redlands water service area. Redlands's water supply is comprised primarily of surface water from the Santa Ana River and Mill Creek and supplemented by groundwater extracted from the Bunker Hill Basin (part of the San Bernardino Basin) and Yucaipa Basin and a small amount of imported water when needed.³⁵ The Urban Water Management Plan (UWMP) for City of Redlands is based on projected growth included in General Plans for areas within their service area.

Per UWMP requirements, Redlands has evaluated reliability for an average year, single dry year, and a 5 consecutive dry year period. Redlands's demands in single dry years are assumed to increase by 10% above normal year demands. The local groundwater basins Redlands produces water from have storage for use in dry years so Redlands's supplies are 100% reliable during normal and single dry years.³⁶ Moreover, Redlands can produce the volume of water needed to meet 100% of demands in multiple dry years.³⁷

The Project Application includes an Ordinance Text Amendment to add "Self-storage with a minimum of 5 acres or more" as a use that requires a Conditional Use Permit (CUP) in the C-4 District. Although the Proposed Project requires an Ordinance Text Amendment, the proposed self-storage facility includes less water-intensive uses than the current C-4

³⁵ Water Systems Consulting, Inc. and Woodard & Curran. 2020 Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan.

³⁶ Water Systems Consulting, Inc. and Woodard & Curran. 2020 Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan.

³⁷ Water Systems Consulting, Inc. and Woodard & Curran. 2020 Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan.

district permitted uses, such as motels, retail stores, commercial greenhouses, etc. Therefore, the Proposed Project water demand is already anticipated from buildout of the General Plan Planning Area. Since the City has sufficient water supplies to meet current and future development consistent with its General Plan through the year 2035, additional water storage and treatment facilities are not anticipated to be required through build out of the General Plan in 2035.

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

- c) **Less Than Significant.** Sewer service in the General Plan Planning Area is provided by the City of Redlands. The Redlands Wastewater Treatment Plant (WWTP) has a secondary treatment capacity of 9.5 million gallons per day (mgd).³⁸ Approximately 6 million gallons of that capacity is in a membrane bioreactor system, the remaining 3.5 million gallons is in a conventional activated sludge process. The WWTP meets all current regional, State, and federal requirements for secondary treatment. The City regularly samples the WWTP's influent and effluent to ensure compliance with State regulations. Current regulations require compliance with water quality standards and these measures would preclude development lacking adequate utility capacity, including wastewater treatment capacity. The Proposed Project would be reviewed by the City and the applicable wastewater providers to determine that sufficient sewer capacity exists to serve the additional population that would be generated by project. The City would continue to coordinate with the wastewater service providers to ensure that new development would not exceed the capacity of wastewater conveyance and treatment facilities. The Proposed Project would be required to pay development impact fees based on the volume of wastewater generated. However, the proposed 700-SF leasing office would be the only wastewater-generating use and flows would be minimal as the office does not include living space. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.
- d) **Less than Significant.** Solid waste from Redlands is primarily disposed of at the California Street Landfill operated by the Quality of Life Department and the San Timoteo Sanitary Landfill operated by the County, both within the city limits. The California Street Landfill is located at 2151 Nevada Street and encompasses 115 acres. Its design capacity is 11.4 million cubic yards, and its maximum permitted capacity is 10 million cubic yards. It has a maximum permitted throughput of 829 tons per day. As of July 25, 2018, it has a remaining capacity of 5,168,162 cubic yards.³⁹ The San Timoteo Sanitary Landfill is located on San Timoteo Canyon Road and is 366 acres in size. It has a permitted capacity of 20,400,000 cubic yards and a maximum permitted daily throughput of 2,000 tons. As of April 30, 2019, the remaining capacity was 12,360,396 cubic yards.⁴⁰

The California Department of Resources Recycling and Recovery (CalRecycle) provides unofficial estimates of solid waste generation and disposal rates for five different land use

³⁸ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.

³⁹ CalRecycle. Solid Waste Information System database.

⁴⁰ CalRecycle. Solid Waste Information System database.

or business types: commercial, industrial, institutional, residential, and service. Given that the proposed development project is a self-storage facility, the only daily generation of waste would come from the proposed 700-SF leasing office. Based on these uses, the Proposed Project is estimated to generate a total of 4.2 pounds of solid waste per day, or approximately 0.002 tons per day (0.006 pounds per square-foot of office space per day).⁴¹ It is anticipated that patrons of the storage facility would contribute minimally to the generation of solid waste on a daily basis through clean out of units.

Therefore, the Proposed Project solid waste generation contribution to these landfills would be nominal and would not exceed the daily permitted capacities of these facilities. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

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

XX. WILDFIRE

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

- | | Potentially
Significant
Impact | Less than
Significant with
Mitigation | Less than
Significant | No
Impact |
|--|--------------------------------------|---|-------------------------------------|--------------------------|
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan? | ☐ | ☐ | ☒ | ☐ |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | ☐ | ☐ | ☒ | ☐ |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or | ☐ | ☐ | ☒ | ☐ |

⁴¹ CalRecycle. Estimated Solid Waste Generation Rates. Accessed June 23, 2022.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
other utilities) that may exacerbate fire risk or that may result in temporary ongoing impacts to the environment?				
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐
a) Less than Significant. The Project Site does not contain any critical facilities. It is adjacent to Naples Avenue, Jasper Avenue, and Wabash Avenue, which are not evacuation routes. ⁴² Access to the Project Site would be provided by two proposed driveways: one from Jasper Avenue and one from Wabash Avenue. Entries to the storage units would be gated. Additionally, the California Emergency Services Act requires the City to manage and coordinate the overall emergency and recovery activities within its jurisdictional boundaries. The City's Emergency Operations Plan includes policies and procedures to be administered by the City in the event of a disaster. During disasters, the City of Redlands is required to coordinate emergency operations with the County of San Bernardino. Policies within the City's General Plan and updates to the City's Emergency Plan, as required by State law, would ensure the Proposed Project would not interfere with adopted policies and procedures. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.				
b) Less than Significant. The Project Site is located in an area with moderate threat to fire hazards. ⁴³ It is not located within a High or Very High Fire Hazard Severity Zone. The property is located in a developed area with residential, commercial, and light industrial uses. The Project Site is not located adjacent to or near wildlands. Development of the Proposed Project shall comply with the California Fire Code. Therefore, the Proposed Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. No significant impacts are identified or anticipated, and no mitigation measures are required.				
c) Less than Significant. The Proposed Project may include the installation of utilities; however, installation, operation and maintenance of utilities would be in compliance with fire safety regulations. The Project Site is not located within a Very High Fire Hazard Severity Zone. ⁴⁴ The proposed self-storage facility would replace the existing vegetation onsite with impervious surface, buildings with fire safety and fire suppression design elements, and proper landscaping, thereby reducing the risk of wildfire. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.				

⁴² San Bernardino County. Countywide Policy Plan web maps: PP-2 "Evacuation Routes." Accessed June 21, 2022

⁴³ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.7-3: Fire Hazards and Fire Safety Services.

⁴⁴ Placeworks. San Bernardino Countywide Policy Plan Draft EIR. Hazards and Hazardous Materials. Figure 5.8-6 "Fire Severity and Growth Areas in the East Desert Regions."

- d) **Less than Significant.** The Project Site is neither located within a 100-year floodplain nor a 500-year floodplain.⁴⁵ Furthermore, it is not located within a High or Very High Fire Hazard Severity Zone. The property is located in a relatively flat and developed area. The Project Site is not located adjacent to or near wildlands. Therefore, the Proposed Project would not expose persons or structures to post-fire slope instability or post-fire drainage. No significant impacts are identified or are anticipated, and no mitigation measures are required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE:

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐
a) Less than Significant with Mitigation. A Biological Technical report was prepared in June 2022 for the Proposed Project by ECORP. The literature review and database searches identified 32 special-status plant species that have been documented in the vicinity of the Project Site. The 32 special-status plant species were presumed to be absent due to the lack of suitable habitat onsite. Of the 49 special-status wildlife species identified in the literature review and database searches, one was found to have a low potential to occur: burrowing owl. During the survey, no suitable burrows or burrow-like structures were observed on or adjacent to the Project Site. The site contained marginally suitable burrowing owl habitat consisting of low-growing ruderal grassland habitat and friable, sandy loam soils. To avoid potentially significant impacts to burrowing owl, Mitigation Measure BIO-1 shall be				

⁴⁵ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.9-2 "Flood Hazards."

implemented. The remaining 48 special-status wildlife species are presumed absent from occurring on or adjacent to the site due to the lack of suitable habitat; proximity to the surrounding residential, commercial, and industrial development; and the presence of anthropogenic disturbances associated with the commercial and industrial development surrounding the site. The Peruvian pepper tree observed on the Project Site and the trees immediately adjacent to the Project Site could provide nesting habitat for nesting birds and ground nesting bird species. If construction of the Proposed Project occurs during the bird breeding season (typically February 1 through August 31), ground-disturbing construction activities could directly affect birds protected by the MBTA and their nests through the removal of habitat on the Project Site, and indirectly through increased noise, vibrations, and increased human activity. Impacts to nesting birds would be less than significant with the implementation of Mitigation Measure BIO-2

A Cultural Resources Inventory and Evaluation Report was prepared for the Project Site in June 2022 by ECORP. The inventory included a records search, literature review, and field survey. A records search of the California Historical Resources Information System at the South Central Coastal Information Center indicated that no previous cultural resource studies have been conducted within the Project Site. Twenty-six studies have been conducted within 1 mile of the Project Site. Fifty-four cultural resources were previously recorded within 1 mile of the Project Site. One previously recorded resource, P-36-012351, extends into the Project Site. A search of the Sacred Lands File was completed by the California Native American Heritage Commission and resulted in a positive finding, indicating that Native American Sacred Lands have been recorded in the Project Site. As a result of the field survey, one historic-period cultural resource was recorded inside the Project Site: MW-001, a concrete pad associated with agriculture. Resource P-36-012351 and newly identified resource MW-001 have both been evaluated as not eligible for the National Register of Historic Places or the California Register of Historical Resources under any criteria. Due to the presence of Holocene sediments within the Project Site, there is a moderate potential for the discovery of subsurface deposits or eligible sites within the Project Site. Therefore, Mitigation Measures CR-1, CR-2, TCR-1, and TCR-2 shall be implemented to address potential impacts to cultural resources.

- b) **Less than Significant.** Cumulative impacts are defined as two or more individual affects that, when considered together, are considerable or that compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the development when added to the impacts of other closely related past, present, and reasonably foreseeable or probable future developments. Cumulative impacts can result from individually minor, but collectively significant, developments taking place over a period. The CEQA Guidelines, Section 15130 (a) and (b), states:
- (a) Cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable.
 - (b) The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as

is provided of the effects attributable to the project. The discussion should be guided by the standards of practicality and reasonableness.

Air Quality

Development of the Proposed Project will be conditioned to comply with current SCAQMD rules and regulations to minimize impacts to air quality as discussed. Approval of the project does not require a zone change nor a general plan amendment and is consistent with the City General Plan land use designation. Therefore, cumulative impacts are anticipated to be less than significant.

Greenhouse Gas

Greenhouse gas (GHG) emissions are cumulative in nature, in that, no one single project can measurably contribute to climate change and its affects (global average change in temperature, rising sea levels etc.). The direct or indirect GHG impacts are therefore not evaluated on a local level, but whether or not the GHG emissions resulting from the project are cumulative; that is, they add considerably to an increase in GHGs as compared to the existing environmental setting based on: 1) an established significance threshold(s); or 2) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

As summarized previously, the Proposed Project's GHG emissions fall below the Tier 3 SCAQMD draft screening threshold of 3,000 metric tons of CO₂ equivalent per year and the Proposed Project is in compliance with the reduction goals AB 32 and SB 32. Furthermore, all of the post-2020 reductions in GHG emissions are addressed via regulatory requirements at the State level and the Proposed Project will be required to comply with these regulations as they come into effect. Moreover, the Proposed Project would be consistent with the Project Site's land use designation of Commercial, therefore it would not conflict with the CAP. As such, the Proposed Project's incremental contribution to greenhouse gas emissions and their effects on climate change would not be cumulatively considerable.

Although cumulative impacts are always possible, the Proposed Project, by incorporating all mitigation measures outlined herein, would reduce its contribution to any such cumulative impacts to less than cumulatively considerable. Therefore, with the incorporation of mitigation measures identified in this document, the Proposed Project would result in individually limited, but not cumulatively considerable, impacts.

- c) **Less than Significant.** The development of the Proposed Project would not cause adverse impacts on humans, either directly or indirectly. As is most case for most areas in southern California, the Project Site is susceptible to seismic hazards. As summarized in Section VII, the Proposed Project is not susceptible to geologic hazards. Good planning and design of the project can limit the impact of these constraints. With adherence to the City of Redlands Development Code and California Building Code, the Proposed Project is not anticipated to result in a safety hazard for people residing or working at the Project Site.

SECTION 4 REFERENCES

- CalRecycle. Estimated Solid Waste Generation Rates. Accessed June 23, 2022.
- CalRecycle. Solid Waste Information System database.
- California Energy Commission. <https://ecdms.energy.ca.gov/Default.aspx>. Accessed April 15, 2022.
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