REQUEST FOR HISTORIC AND SCENIC PRESERVATION COMMISSION ACTION

V.B. DUKE REALTY TENNESSEE STREET LP C/O PROLOGIS, INC., APPLICANT
(PROJECT PLANNER: NYLSEN ESCAJEDA)

1. **PUBLIC HEARING** to consider **Demolition Permit No. 404** to demolish an industrial building and two accessory buildings that are a total of approximately 196,972 square-feet in size and over 50 years of age, and other related on-site improvements. The subject property is located at 301 Tennessee Street (APN: 0292-192-11-0000) within the Industrial (I-P) District. The proposal is subject to the California Environmental Quality Act (CEQA), and a Mitigated Negative Declaration was previously adopted for the project and demolition in accordance with Section 15162 of the CEQA Guidelines.

HISTORIC AND SCENIC PRESERVATION MEETING: November 5, 2026

Planner: Nylsen Escajeda, Assistant Planner

PROCEDURE FOR PUBLIC HEARING

1. Chairperson declares the meeting open as a public hearing.
2. Chairperson calls upon staff for report.
3. Chairperson calls for questions/comments from members of the Commission.
4. Chairperson calls upon applicant, or its representative, for comments/testimony.
5. Chairperson calls for comments/questions/testimony from members of the public (3 minutes per speaker).
6. Chairperson calls upon the applicant, or representative, for rebuttal comments (5 minutes).
7. Chairperson closes the public hearing.
8. Commission considers the motion(s) and votes.

SYNOPSIS

1. Historic Designation: The structure is not designated as historic, nor within a historic district, by the City of Redlands, the State of California, or the United States Government.

2. Existing Land Use: Industrial/Manufacturing

3. Zoning: Industrial (I-P) District

4. General Plan: Light Industrial

4. Historic and Scenic Preservation Commission submittal dates:

(A) Date Submitted: July 20, 2026

(B) Date Accepted as Complete: August 20, 2026
(C) Historic and Scenic Preservation Commission Meeting: November 5, 2026

4. Attachments:
A: Location Map & Aerial Photo
B-1: Mitigated Negative Declaration (for CRA No. 975 and CUP No. 1206)
B-2: Historic Resources Assessment
C: Photographs
D: Resolution No. 2026-03

BACKGROUND / PROPOSAL

The applicant is proposing to demolish three buildings on entire existing industrial site: one 182,734 square-foot industrial building, an approximately 12,547 square foot accessory building, and a 1,691 square foot accessory building, all over 50 years of age, located at 301 Tennessee Street within the Industrial (I-P) district.

The project site consists of two parcels that have been previously developed. A single-story home once occupied the western portion of the project site (360 Kansas Street), but was demolished in 2025. The eastern portion of the site is currently fully developed and was originally constructed as a La-Z-Boy manufacturing facility with ancillary storage and distribution functions for the products manufactured on-site. The manufacturing building is approximately 182,734 square-feet in area, with an approximate height of 20 feet. This manufacturing facility was opened in 1966 and closed in late 2019. The applicant has been leasing the building to a clothing distributor since 2022. (Attachment A: Location Map & Aerial Photo)

The result of the demolition will enable the construction of a new 193,469 square-foot concrete tilt-up building and associated site improvements (development project previously approved June 25, 2025, with Conditional Use Permit No. 1206 and Commission Review & Approval No. 975).

The site is not located within any registered Historic and Scenic District, and the existing industrial building not listed as a designated historic resource. The San Bernardino County Assessor’s records indicate the building was constructed in 1966.

ENVIRONMENTAL REVIEW

The proposed demolition was evaluated as part of the previously adopted Initial Study/Mitigated Negative Declaration for the 301 Tennessee Street Warehouse Project (SCH No. 2023050084) along with the city entitlement established as Commission Review and Approval No. 975 and Conditional Use Permit No. 1206. Based on the

review of the project and the associated environmental records, no conditions requiring further environmental review under CEQA Guidelines Section 15162 have occurred. Therefore, no additional environmental document is required.

Staff also prepared a preliminary environmental checklist for the proposed project in accordance with Section 15.44.060 of the Redlands Municipal Code, which requires an environmental checklist to be prepared for all demolition permit applications involving structures over fifty (50) years old.

Staff conducted research on the subject parcel and there is no evidence that the site or structure is associated with any historical event or person that contributes to the history of the United States, California, San Bernardino County, or the City of Redlands. In addition, there is no evidence the property embodies any distinctive characteristics of a type, period, region, method of construction or high artistic value, nor does the property present any potential to yield any information important to history or pre-history.

ANALYSIS

City permit records indicate that the building was constructed in 1966 and was established as a La-z-Boy Furniture Manufacturing Plant. It operated as such until it closed down in 2019. The applicant has been leasing it out for other operations, namely a clothing distribution company.

According to the Historic Resources Assessment contained in the Historic/Archaeological Resources Survey Report prepared by CRM Tech (February 2023), included as Appendix B to the project's Initial Study/Mitigated Negative Declaration, (Attachment B1: Mitigated Negative Declaration [for CRA No. 975 and CUP No. 1206] & Attachment B2: Historic Resources Assessment) the property 301 Tennessee (p. 15). "The former La-Z-Boy manufacturing plant at 301 Tennessee Street consists of a main office/warehouse building and two smaller auxiliary buildings of concrete tilt-up construction situated to the north, all of them resting on concrete slab foundations with flat roofs (Fig. 12). The main building is a tall one-story steel-frame and concrete structure that covers nearly two acres. Its squarish shape is a product of later additions that effectively doubled the original footprint, while some of the additions resulted in protrusions from the building. The concrete cladding covers nearly all of the exterior, leaving the building relatively blind but punctuated by loading docks with roll-up doors or single entries filled with metal commercial doors. The rectangular front office portion on the eastern side, facing Tennessee Street, has a flat but lower roof, with its Armantrout-designed Modern-style elements somewhat overshadowed by the sizable unadorned additions at either end. Nevertheless, the Modern style remains apparent in the deeply recessed main entry between slightly over-extended brick partitions sheltering a plateglass wall and a metal-framed glass door with a transom. Varnished pine wood slats cover the entry ceiling, while square cut-outs in the brick sides allow a

view of low-growing tropical plant gardens that flank the entry. A steel-framed enclosure reaching the roof level is filled on the top two-thirds by smoke glass, and open at the bottom. The entry is accessed by a brick-edged pebbled concrete walkway, flanked by low planters and paved parking lots and driveway." (Attachment C: Photographs) The report also references that the building was designed by Leon H. Armantrout, a prolific architect in the city who has built a number of residential, professional, educational, and religious buildings in the city. His emphasis was in Mid-Century Modern and Late Modern styles. Note, that only a portion of the East side of the principal building has the Modern style and accents. Approximately only 350 feet of the approximately 1850 feet of the principal building's elevations were made with the Modern design, or roughly 19%.

Throughout the years, additions have been made to the structure. "Constructed by local contractors Forsberg and Gregory, Inc., the La-Z-Boy building was originally a 72,000-square-foot manufacturing plant (City of Redlands 1965). In 1972-1973, 43,600 square feet were added to the factory and 800 square feet to the front office, followed by a 624-square-foot tiltup panel addition and another 9,225 square feet in 1991 (City of Redlands 1972-1991). The two ancillary buildings to the north of the main plant, measuring 12,000 and 1,600 square feet, are both concrete tilt-up structures erected in 1969, again by Forsberg and Gregory, Inc., but with no architect identified in the building permits (City of Redlands 1969). A 1,300-square-foot conference room was added in 2004, and the monument sign along Tennessee Street was installed in 2014 (City of Redlands 2004-2014)." (IS/MND, Appendix B, p. 14).

The procedures outlined in RMC Section 2.24.090 through Section 2.24.140 apply to the demolition of property recorded in the City of Redlands List of Historic Resources. The subject property is not recorded in the list, and is not subject to the procedures in Section 2.24 of the Redlands Municipal Code (RMC). However, RMC Section 15.44.070 requires that prior to the demolition of any structure over 50 years old, the Historic and Scenic Preservation Commission shall determine if the structure is historically significant. RMC Section 2.62.170 establishes the City's criteria for historic significance. Below each City criteria is listed with justification as to why this structure is not historically significant.

Local Criteria for Significance

Section 2.62.170.A.: It has significant character, interest, or value as part of the development, heritage or cultural characteristics of the City of Redlands, State of California, or the United States.

> *Response:* The City of Redlands does not list this property as individually significant or as a contributor to a historic district. Staff conducted research regarding the property during the preparation of the preliminary environmental

checklist for the demolition of the structure. This research did not reveal any information indicating that the property has significant value related to the cultural heritage of the City, State, or the United States.

Section 2.62.170.B.: It is the site of a significant historic event.

Response: No information was found associated with significant events related to this structure. Based on the research conducted by staff through local and regional newspaper database searches, building records, and directory searches, staff determined the land on which the structure is located was undeveloped prior to the construction of the structure to be demolished and that the property is not related to any historic event.

Section 2.62.170.C.: It is strongly identified with a person or persons who significantly contributed to the culture, history or development of the City.

Response: Research has shown that the building owners and operators, the La-Z-Boy company, had some involvement in City events, such as being a sponsor in the Redlands Bowl Summer Music Festival. The operation also brought the co-founder of the company, Edward Knabusch and his wife, to the city for a visit and hosting with then-mayor Waldo Burroughs.

No information indicates that the property is associated with anyone making a significant contribution to the culture, history or development of the City.

Section 2.62.170.D.: It is one of the few remaining examples in the City possessing distinguishing characteristics of an architectural type or specimen.

Response: While the structure has undergone a number of additions, the overall architectural style has remained the same, mainly the Modern facade style of the office. However, many other industrial sites in the city also have utilitarian concrete and/or stucco cladding with a stylized front facade. A nearby example is the Southern California Edison building (at 287 Tennessee Street).

Section 2.62.170.E.: It is a notable work of an architect or master builder whose individual work has significantly influenced the development of the city.

Response: The noted architect, Leon H. Armantrout, moved to Redlands in 1960 and set up his office in the city in 1965. The breadth of his work spans custom homes, to institutional, commercial, educational, and religious buildings. Notable works in the city include the First United Methodist Church, the relocation and expansion of the ESRI campus, Redlands Community Center, Town Square Design for Redlands Mall, Empire Bowl, Redlands Medical Center, and the San Bernardino County Museum.

This building offers only a subdued example of his work relative to the overall size of the building, especially after the additions that have happened over the years.

Section 2.62.170.F.: It embodies elements of architectural design, detail, materials, or craftsmanship that represents a significant architectural innovation.

Response: As discussed under Sections 2.62.170.D and Sections 2.62.170.E above, the structure was constructed using common building materials and methods. While an example of Mr. Armantrout's Modern design work, it isn't noted or to the scale of his other more notable works, such as the Esri Campus.

Additionally, the site's industrial purpose and use simplified the overall design style, with concrete clad walls for the majority of it.

Section 2.62.170.G.: It has a unique location or singular physical characteristics representing an established and familiar visual feature of a neighborhood, community, or the city.

Response: The subject structure and the parcel do not possess any physical characteristics representing an established and familiar visual feature that is notable in the neighborhood, community, or the city. The subject property is an interior lot developed with existing industrial structures. The structures are utilitarian in nature and not particularly notable.

Section 2.62.170.H.: It has unique design or detailing.

Response: As discussed under Section 2.62.170.D above, the structure does not incorporate any unique design or detailing. This edition of Modern design did not incorporate portions of unique design or detailing, with much of it shows normal maintenance conditions due to age and exposure to weather.

Section 2.62.170.I.: It is a particularly good example of a period or style.

Response: The structure does not possess any particular architectural merit. As discussed above in Section 2.62.170.D, this structure is not a particularly good example of any particular period or style.

Section 2.62.170.J.: It contributes to the historical or scenic heritage or historical or scenic properties of the city (to include, but not be limited to, landscaping, light standards, trees, curbing, and signs).

Response: The site is minimally landscaped. Some landscaping is present throughout the property. However, none of it was designed by a prominent landscape architect nor does the site have a distinguishing or significant feature.

Section 2.62.170.K.: It is located within a historic and scenic or urban conservation district, being a geographically definable area possessing a concentration of historic or scenic properties which contribute to each other and are unified aesthetically by plan or physical development.

Response: The site is not located within a historic and scenic district, or urban conservation district. The surrounding properties range widely in dates of construction and use, but most have undergone substantial change from the date of this site being constructed. Additionally, most of these surrounding properties are industrially zoned, and are not historically designated or located within a historic district. Collectively, they do not convey an aesthetically unified concentration of resources.

CEQA Criteria for Significance

The proposed demolition was evaluated as part of the previously adopted Initial Study/Mitigated Negative Declaration for the 301 Tennessee Street Warehouse Project (SCH No. 2023050084) along with the city entitlement established as Commission Review and Approval No. 975 and Conditional Use Permit No. 1206. No conditions requiring subsequent environmental review under CEQA Guidelines Section 15162 have occurred. Therefore, no additional environmental document is required.

A. Associated with events have made a significant contribution to the broad patterns of California History and cultural heritage.

Response: The property was developed in 1966. No information indicates that the property is associated with anyone making a significant contribution to California history or cultural heritage. An extensive newspaper search has not yielded any information that indicates that the property is associated with anyone making a significant contribution to California history or cultural heritage.

B. Is associated with the lives of persons important in our past.

Response: Please see the response to Section 2.62.170.C above. As discussed above, none of the people associated with the property appear to be important in history.

C. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

Response: The structure on this property is not a distinctive example of any particular type, period, or construction method. While designed by Leon H. Armantrout, a prominent designer in the city of Redlands, the structure itself is

not a notable example of his breadth of work in the city. While other projects (such as the Redlands Mall and the Esri Campus) were much larger in scale and people oriented, this site only has a relatively small portion that has a Modern design, with the rest being utilitarian concrete cladding on the building.

D. Has yielded, or may be likely to yield, information in prehistory or history.

Response: The building and site have not yielded any information regarding prehistory or history. The structure was built in 1966 using common building materials and practices. Based on the review of the criteria above as it relates to the demolition of the structure, it is not historically significant and approval of the proposed project will not cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.

Conclusion of Analysis

Based on the listed criteria and their associated responses, the principal structure onsite is not historically significant, and nor are the accessory buildings. The Historic and Scenic Preservation Commission is authorized to determine the potential historical significance of the structure and the need for any further environmental review, and may subsequently approve, condition or deny the demolition permit application. If the Commission determines that the property has no historical significance and the permit application is approved, the application is exempt from further review by the City unless an appeal is made to the City Council. If no appeal is filed within the time provided, the Development Services Department may issue the demolition permit in accordance with the Redlands Municipal Code.

If the Commission determines that the structure has historical significance, the Commission would then direct staff to conduct additional environmental review and subsequently approve, condition, or deny the application.

STAFF RECOMMENDATION

Staff recommends that the Historic and Scenic Preservation Commission approve Demolition Permit No. 404, subject to the recommended conditions of approval contained in the Resolution (Attachment D: Resolution No. 2026-03).

MOTIONS

If the Historic and Scenic Preservation Commission deems it appropriate, staff recommends the following motions:

Environmental Determination:

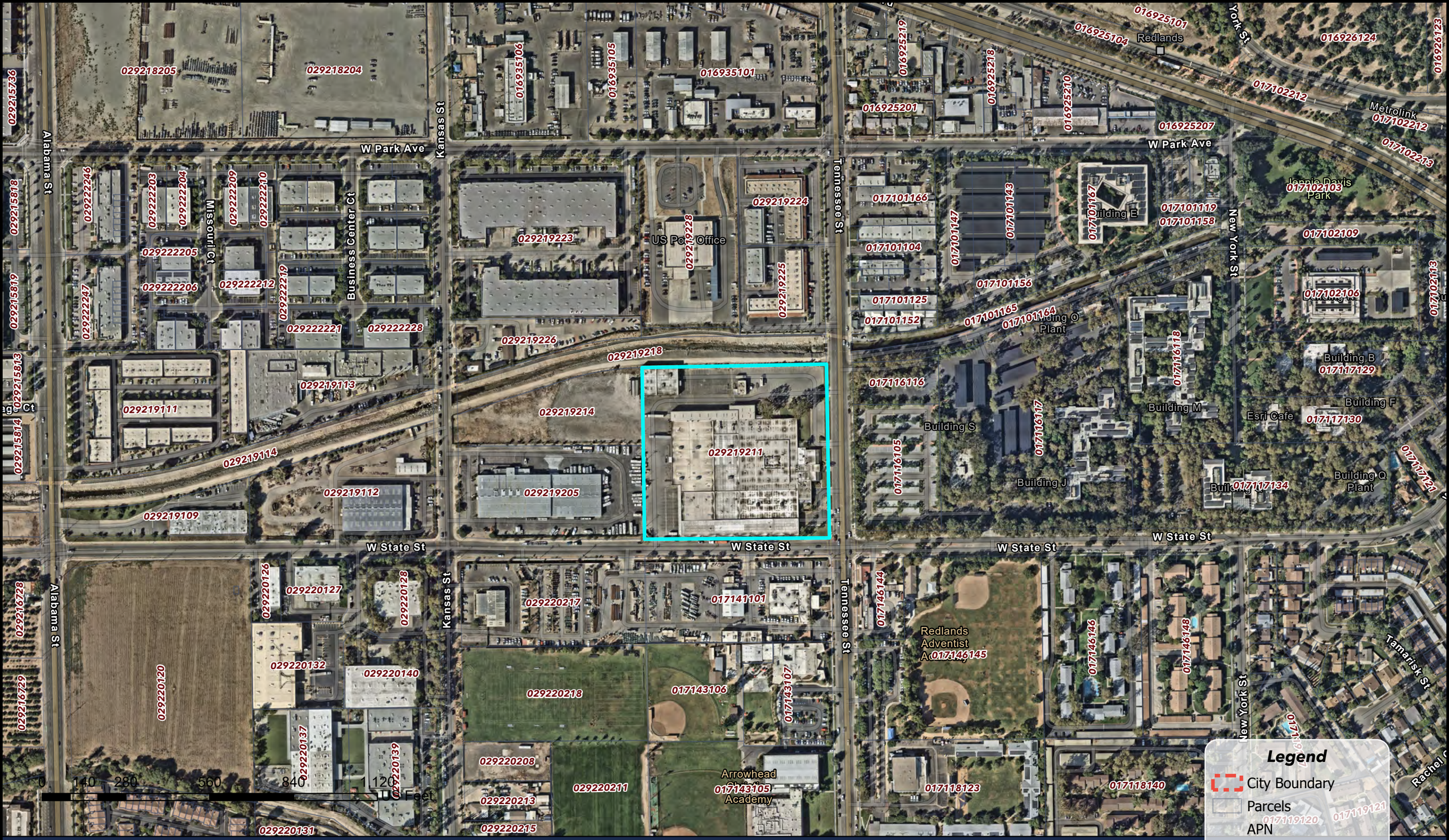
"I move to determine that Demolition Permit No. 404 is exempt from the California Environmental Quality Act (CEQA) pursuant to Section 15162 of the CEQA Guidelines."

Demolition:

"I move that the Historic and Scenic Preservation Commission adopt Resolution No. 2026-03 and approve Demolition Permit No. 404, based on the facts and analysis in this staff report, and subject to the attached Conditions of Approval."

ATTACHMENT “A”

Location Map and Aerial Photograph



Legend

- City Boundary
- Parcels
- APN

City of Redlands

Attachment A1 - Location Map and Aerial

Author: Redlands GIS **Date:** 10/19/2026



City of Redlands

Attachment A2 - Location Map and Aerial

Author: Redlands GIS **Date:** 10/19/2026

ATTACHMENT “B1”

Mitigated Negative Declaration (for CRA No. 975 and CUP No. 1206)

301 Tennessee Street Warehouse Project
Initial Study and Mitigated Negative Declaration

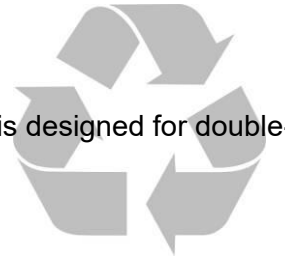
Lead Agency:

City of Redlands
35 Cajon St., Ste. 20/P.O. Box 3005
Redlands, CA 92373
Office 909.798.7555 ext. 7344

Prepared by:

MIG, Inc.
1650 Spruce Street, Suite 106
Riverside, California 92507

Public Review Draft
May 1, 2023



- This document is designed for double-sided printing -

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Appendix C Phase I Environmental Site Assessment
Appendix D Noise and Vibration Impact Analysis
Appendix E Measure U Focused Traffic Analysis and VMT Screening Analysis

1 Introduction

The City of Redlands (Lead Agency) received an application from Prologis Inc. (applicant) for the redevelopment of an existing industrial warehouse site with a 197,397-square foot Class A light industrial building which includes 8,000-square foot of office space on approximately 10.98 acres of land in the City of Redlands, California. The approval of the application constitutes a *project* that is subject to review under the California Environmental Quality Act (CEQA) 1970 (Public Resources Code §§ 21000, *et seq.*), and the CEQA Guidelines (14 California Code of Regulations §§ 15000, *et. seq*.).

This Initial Study was prepared to assess the short-term, long-term, and cumulative environmental impacts resulting from the proposed project. This report was prepared to comply with CEQA Guidelines § 15063, which sets forth the required contents of an Initial Study. These include:

- A description of the project, including the location of the project (See Section 2);
- Identification of the environmental setting (See Section 2.10);
- Identification of environmental effects by the use of a checklist, matrix, or other methods, provided that entries on the checklist or other form are briefly explained to indicate that there is some evidence to support the entries (See Section 4);
- Discussion of ways to mitigate significant effects identified, if any (See Section 4);
- Examination of whether the project is compatible with existing zoning, plans, and other applicable land use controls (See Section 4.11); and
- The name(s) of the person(s) who prepared or participated in the preparation of the Initial Study (See Section 5).

1.1 – Purpose of CEQA

CEQA § 21000 of the California Public Resources Code provides as follows:

The Legislature finds and declares as follows:

a) The maintenance of a quality environment for the people of this state now and in the future, is a matter of statewide concern.
b) It is necessary to provide a high-quality environment that at all times is healthful and pleasing to the senses and intellect of man.
c) There is a need to understand the relationship between the maintenance of high-quality ecological systems and the general welfare of the people of the state, including their enjoyment of the natural resources of the state.
d) The capacity of the environment is limited, and it is the intent of the Legislature that the government of the state take immediate steps to identify any critical thresholds for the health and safety of the people of the state and take all coordinated actions necessary to prevent such thresholds being reached.
e) Every citizen has a responsibility to contribute to the preservation and enhancement of the environment.
f) The interrelationship of policies and practices in the management of natural resources and waste disposal requires systematic and concerted efforts by public and private interests to enhance environmental quality and to control environmental pollution.
g) It is the intent of the Legislature that all agencies of the state government which regulate activities of private individuals, corporations, and public agencies which are found to affect the quality of the environment, shall regulate such activities so that major consideration is given to preventing environmental damage while providing a decent home and satisfying living environment for every Californian.

The Legislature further finds and declares that it is the policy of the state to:

h) Develop and maintain a high-quality environment now and in the future, and take all action necessary to protect, rehabilitate, and enhance the environmental quality of the state.
i) Take all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive noise.
j) Prevent the elimination of fish or wildlife species due to man's activities, ensure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities and examples of the major periods of California history.
k) Ensure that the long-term protection of the environment, consistent with the provision of a decent home and suitable living environment for every Californian, shall be the guiding criterion in public decisions.
l) Create and maintain conditions under which man and nature can exist in productive harmony to fulfill the social and economic requirements of present and future generations.
m) Require governmental agencies at all levels to develop standards and procedures necessary to protect environmental quality.
n) Require governmental agencies at all levels to consider qualitative factors as well as economic and technical factors and long-term benefits and costs, in addition to short-term benefits and costs, and to consider alternatives to proposed actions affecting the environment.

A concise statement of legislative policy, with respect to public agency consideration of projects for some form of approval, is found in CEQA § 21002, quoted below:

> The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects. The Legislature further finds and declares that in the event that specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.

1.2 – Public Comments

Comments from all agencies and individuals are invited regarding the information contained in this Initial Study. Such comments should explain any perceived deficiencies in the assessment of impacts in the Initial Study. To request an appointment to review these materials, please contact:

Sean Reilly, Principal Planner
City of Redlands, Planning Department
35 Cajon Street, Suite 15-A
Redlands, California 92373
909-798-7555

All written comments received during the 30-day public review period for the Initial Study/Mitigated Negative Declaration will be considered by the City of Redlands prior to adoption.

2 Project Description

2.1 – Project Title

301 Tennessee Street Warehouse Project

2.2 – Lead Agency Name and Address

City of Redlands
Planning Department
35 Cajon Street, Suite 15-A
Redlands, California 92373
909-798-7555

2.3 – Contact Person and Phone Number

Sean Reilly, Principal Planner
909-798-7555, ext. 7344

2.4 – Project Location

The project site is made up of two parcels located on the northwest corner of State Street and Tennessee Street in the City of Redlands, California. (See Exhibit 1 Project Location Map). The surrounding uses include commercial/industrial uses north of the project site, and light industrial uses to the east, west and south of the site.

- Latitude 34° 03’ 27” North, Longitude 117° 12’ 02” West
- APNs #0292-192-11-0000 and 0292-192-14-0000

2.5 – Project Sponsor’s Name and Address

Prologis Inc.
3546 Concours St. Suite 100
Ontario, CA 91764

2.6 – General Plan Land Use Designation

Light Industrial

2.7 – Zoning District

Industrial District (I-P)

2.8 – Project Description

The project includes demolition of an existing manufacturing warehouse and a single-family house, and the construction of a 197,397 square foot light industrial building and associated parking and landscaping improvements. The approximately 10.98 acre site encompasses two parcels, located at the northwest corner of State Street and Tennessee Street in the City of Redlands, California. (APNs

#0292-192-11-0000 and 0292-192-14-0000) (see Exhibits 1-4). The proposed light industrial building would be 189,397 square feet with 8,000 square feet of first and second floor office space totaling 197,397 square feet. Based on the preliminary grading plans, the project would require approximately 23,154 cubic yards of soil import.

Architecture & Fencing

Eight-foot-high decorative walls are proposed around the perimeter of the truck yard area to screen operations from the outside of the project site. The truck entrances located on Kansas Street and Tennessee street would be fenced with eight-foot-high wrought iron fencing.

Landscaping

The proposed project includes approximately 84,845 square feet of ornamental landscaping that would cover 18% of the site. Landscaping would be visible from Kansas street along the west side of the site, Tennessee Street along the east, State Street on the south, and the Orange Blossom Trail that runs along the north face of the project site. The proposed landscaping would include 24-inch and 36-inch box trees, various shrubs, and ground covers to screen the proposed building, and parking and loading areas from off-site viewpoints.

Access and On-Site Circulation

Passenger vehicle access to the project site would be provided via a 30-foot-wide driveway on the east side of the site on Tennessee Street. Primary truck access to the project site would be provided via a 40-foot-wide driveway on the west side of the site along Kansas Street and via one 40-foot-wide driveway on the east side of the site on Tennessee Street. Secondary truck access would be provided via one 40-foot-wide driveway on the south side of the site on State Street. Emergency vehicle access would be provided through the parking lot and around the building with a 30-foot fire lane.

Drainage and Wet Utilities

The proposed project would install new onsite water and sewer lines that would connect to the existing infrastructure in the surrounding streets. Drainage from the proposed project would surface flow through the site and use catch basins and landscape drains to collect for treatment. The subsurface storm drain would be used to convey flows into a proposed underground chamber infiltration system. The underground chambers would be located in the northwesterly landscape area and would fully infiltrate the water volume to the surrounding water system.

Building Operations

The project site is within the light industrial (LI) general plan land use designation and industrial district zone (I-P). The light industrial general plan land use designation allows for manufacturing, distribution, research, and development (R&D) industries, and ancillary commercial uses. The Industrial District (I-P) zoning allows for the development of all industrial uses which is conducive to employees and citizens of the community. Typical operations of the project site may include employees and customers travelling to and from the facility, delivery of materials to the site, and truck loading and unloading. Approximately 10% of warehouse operations would involve cold storage. The project is anticipated to operate 24-hours a day, 7 days per week.

Construction Schedule

Construction activities for the project include demolition, site preparation, grading, building construction, paving, and architectural coatings. Demolition of the existing structures would take three (3) months to complete. Construction of the new building will take nine (9) months. Paving and landscaping would take one (1) month. Additionally, all offsite improvements would take one (1) month. The project would require approximately 24,477 cubic yards of soil import.

2.9 – Surrounding Land Uses

Surrounding land uses are summarized in Table 1.

Table 1
Surrounding Land Uses

Direction	Zoning Designation	Zoning District	Existing Land Use
Project Site	Light Industrial	I-P (Industrial District)	Former La-Z-Boy Facility Single Family Home
North	Office	I-P (Industrial District) M-1(Light Industrial District) C-M (Commercial Industrial) FP-1 (Flood Plan District)	Commercial Shopping Center
South	Light Industrial	I-P (Industrial District)	Industrial Warehouse (SCE Service Center)
East	Light Industrial	A-P (Administrative and Professional Office District) M-P (Planned Industrial District)	Undeveloped land/graded land used for parking
West	Office	EV/IC – (Commercial Industrial)	Industrial Warehouse

2.10 – Environmental Setting

The project is located on an irregularly shaped property approximately 10.98 acres in size on two parcels in a developed area of the City of Redlands, California. It is currently developed with an existing 193,469 square foot former La-Z-Boy Facility manufacturing warehouse and a non-conforming single-family house that is not occupied. The facility was occupied by La-Z-Boy until October 2019, and was subsequently purchased by Esri, a geographic information systems supplier in January 2020. The property was listed for purchase and bought again on April 5th, 2022. *The existing tenant is a 3PO (3rd partly logistics operator) for clothing distribution to major retailers such as Macy's, Target, Amazon, etc. Their hours of operation are 7am to 5pm Monday through Friday.* The property is well maintained with medium-sized trees distributed throughout the property, hedges, and grass with minimal weeds. The project site is flat, with an approximate elevation of 1,358 feet above mean sea level (AMSL). Regional access to the project site is provided by the Interstate 10 Freeway (I-10) located approximately 0.6 miles north.

2.11 – Required Approvals

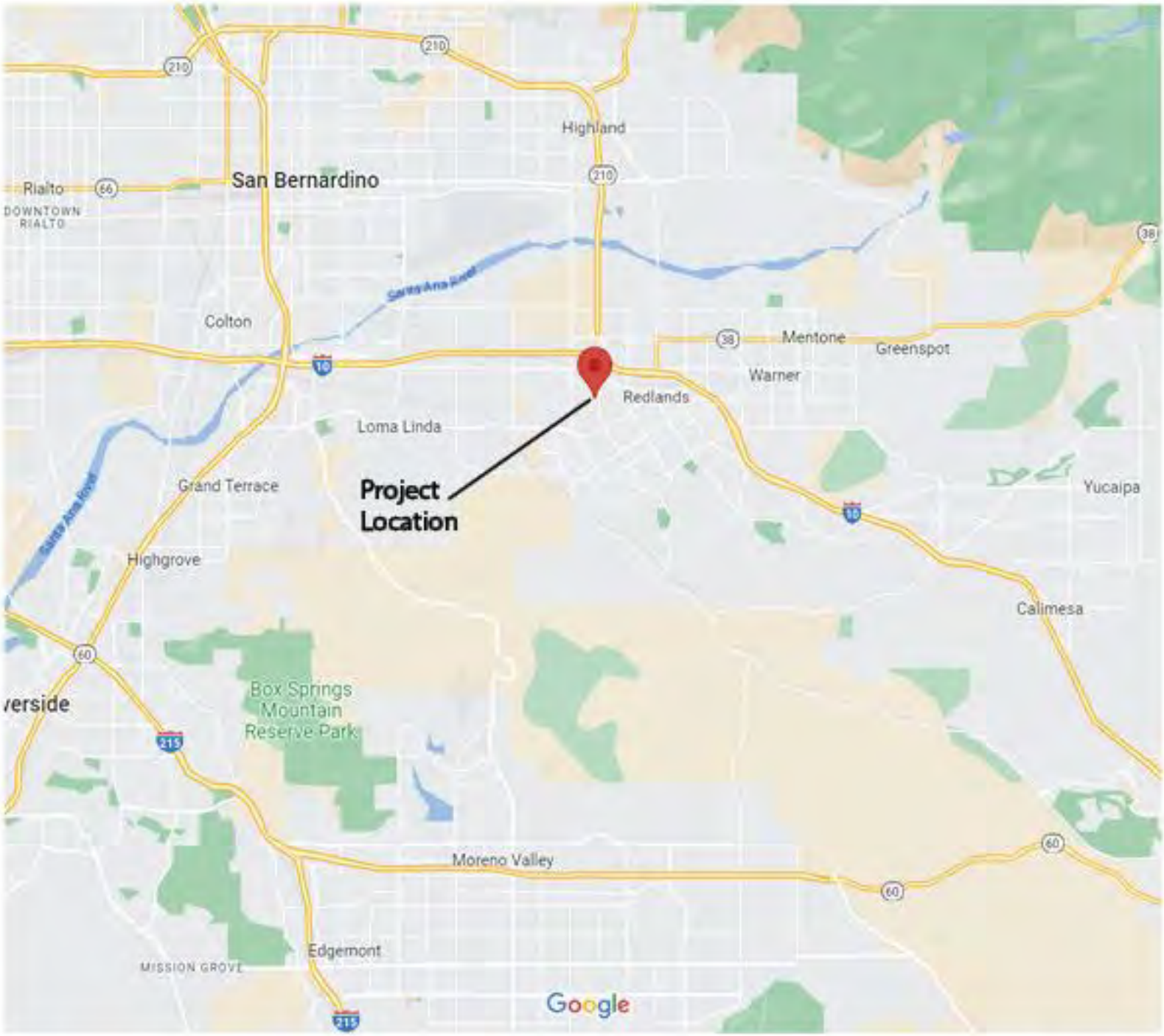
Various permits, approvals, and actions by the City of Redlands and various public agencies may be required to execute and implement the proposed project. The permits from the lead agency that are necessary include:

- Planning Commission Review and Approval No. 948
- Conditional Use Permit No. 1181
- Demolition Permit No. 371
- Demolition Permit No. 373
- Parcel Merger No. 6
- Compliance with the requirements of CEQA

- Building Permit

2.12 – Other Public Agency Whose Approval is Required

- N/A



Source: Google Maps

Not to Scale

Exhibit 1 Regional Context Map

Tennessee Street Warehouse Project
Redlands, California

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Exhibit 2 Project Vicinity Map

Tennessee Street Warehouse Project

Redlands, California

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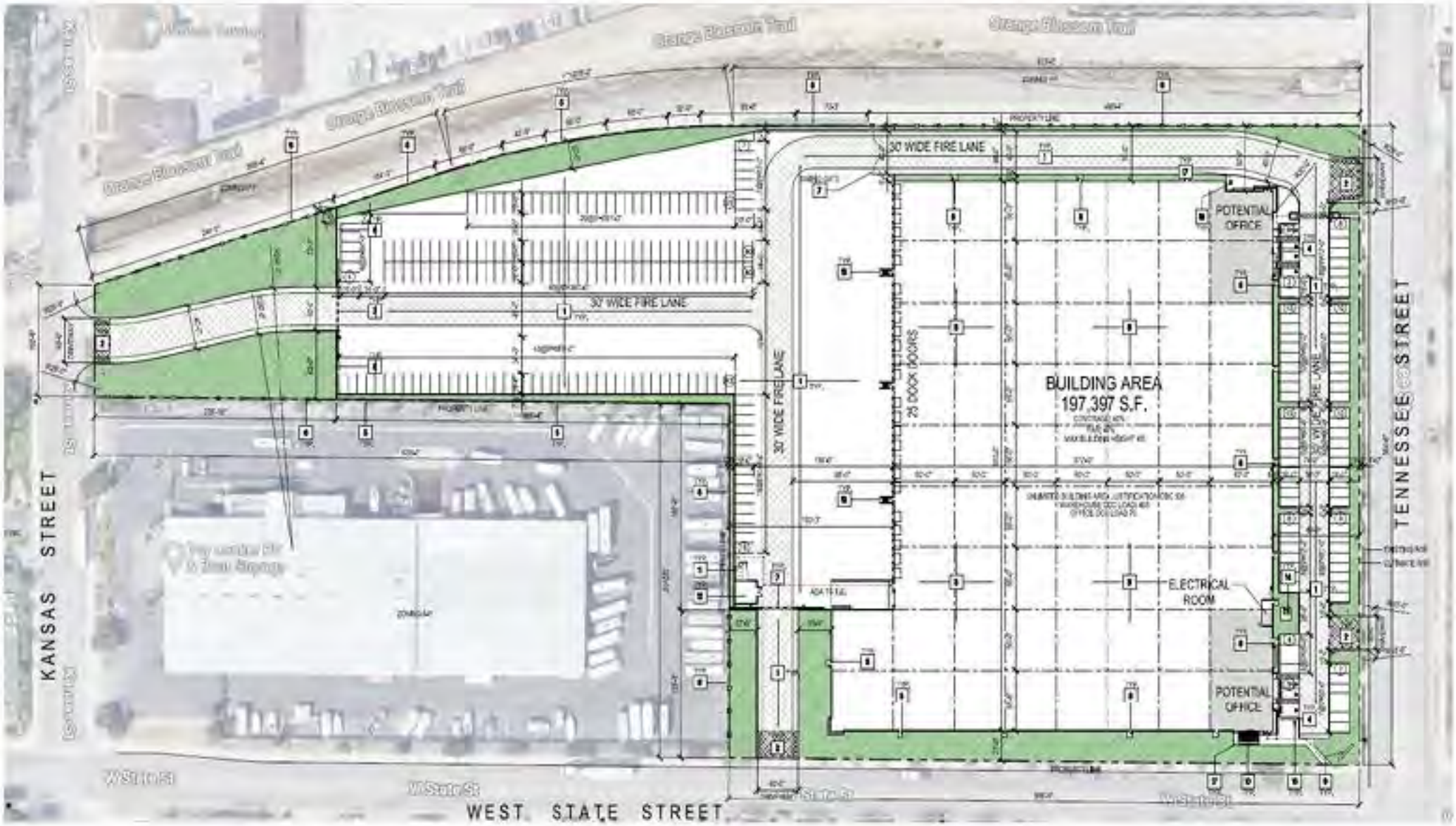


Exhibit 3 Site Plan

Tennessee Street Warehouse Project
Redlands, California

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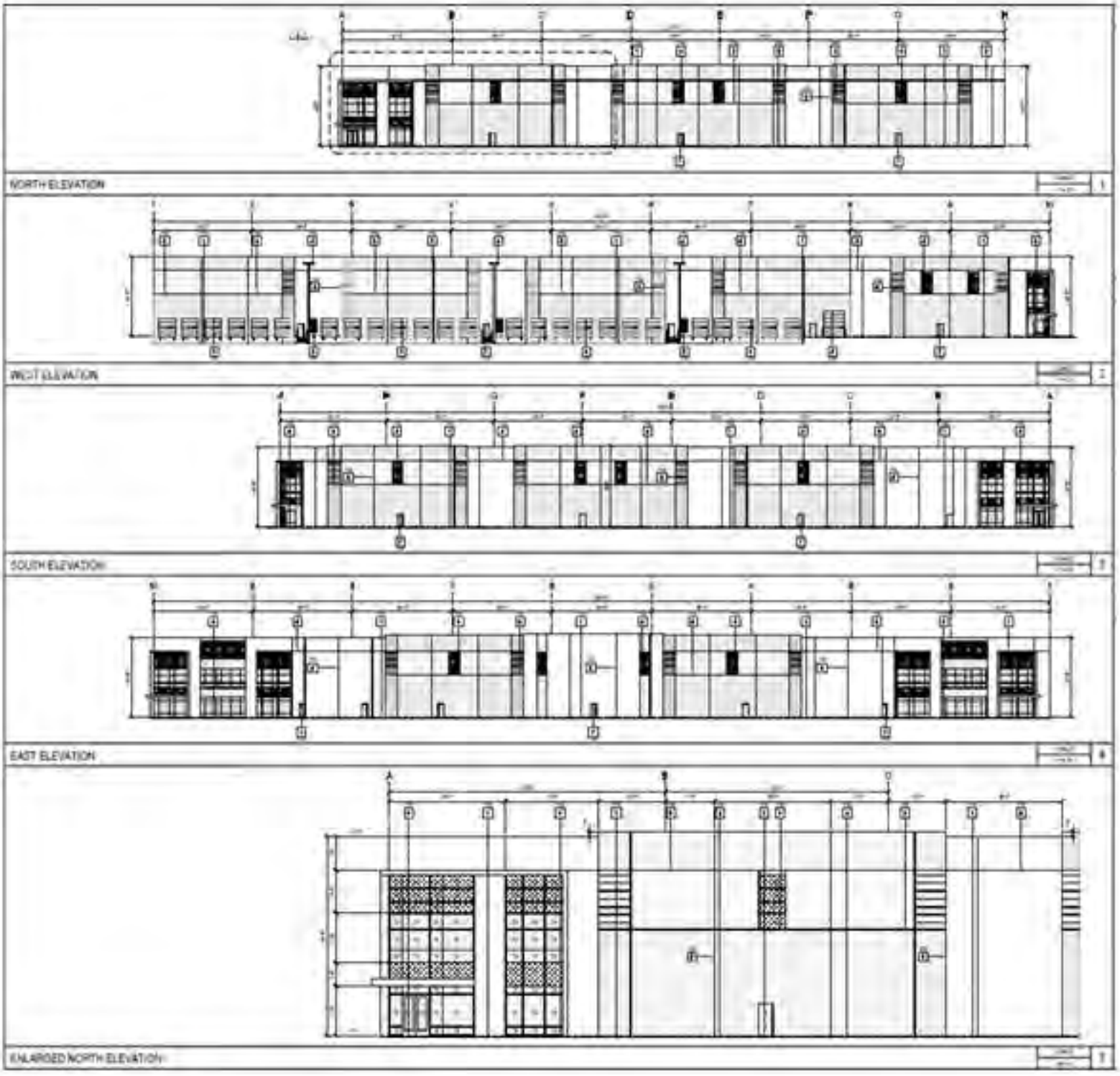


Exhibit 4 Project Elevations

Tennessee Street Warehouse Project

Redlands, California

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3.1 – Environmental Factors Potentially Affected

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

☐	Aesthetics	☐	Agriculture 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/Traffic	☑	Tribal Cultural Resources
☐	Utilities / Service Systems	☐	Wildfire	☐	Mandatory Findings of Significance

3.2 – Determination

☐	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 could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
☐	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 earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Name: Sean Reilly, Principal Planner Date

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4.1 – Aesthetics

Except as provided in Public Resources Code Section 21099, would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	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 view from 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 view 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 Impact. Scenic vistas can generally be defined as natural landscapes that form views of unique flora, geologic, or other natural features that are generally free from urban intrusions. Such resources can be impacted when a structure is built that blocks the view of the vista, or if a development is built on the vista itself. Typical scenic vistas include views of mountains and hills, large, uninterrupted open spaces, and bodies of water. Scenic vistas generally play a large role in the way a community defines itself and effects development patterns as projects are designed to take advantage of viewsheds.

Redland's visual character is tied to its surrounding open space areas, and as such is incorporated into the City's General Plan. The City has overtime acquired open space land around Redlands and incorporated it into a concept called the "Emerald Necklace"; a series of open space and park areas surrounding the City connected by scenic trails and roads. Areas within the City's Planning Area include 254 acres of the San Timoteo Canyon south of the City called the "San Timoteo Nature Sanctuary". Also, to the south, the City owns 338 acres of Live Oak Canyon, 245 acres of which is specifically set aside for conservation. The 4,000 acres of the Santa Ana River Wash makes up the northern boundary of the City, and is owned by multiple stakeholders including Federal, State, and local governments,

utilities, and private groups. The Crafton Hills Open Space makes up part of the eastern portion of the City's Planning Area, and with a general elevation above 2,400 feet, the area is valuable to the City as natural habit and scenic resource. The General Plan ensures the preservation of Redlands' open space corridors and limits development on and around those areas to preserve its visual character and limit encroachment. The General Plan does not designate any scenic vistas within the City. The project site is located in a developed area of the city and is zoned for light industrial uses. Surrounding zoning uses include industrial, commercial, and high-density residential uses. The project is located in an urbanized area, and fits the zoning designated by the City. Furthermore, the project would follow the City's Zoning and Building Codes and will not exceed the City's 50-foot height limit on light industrial zoning, and as such will fit the character of the area as regulated by the City. The proposed project would not constitute any significant loss of visibility to Redlands' scenic vistas as the area's developed industrial setting limits existing scenic vistas. Impacts to the visibility of scenic vistas in Redlands would be less than significant.

b) No Impact. There are no State Scenic Highways on or near the project site, and the site is not visible to a designated state scenic highway as identified on the California Scenic Highway Mapping System. The nearest officially designated scenic highways are California State Route 243 just outside of Banning, and California State Route 38 near Big Bear Lake; the former starting approximately 24 miles southeast of the project site. As of this document being written, State Route 38 in Redlands has not been officially designated but is eligible. The City Council has designated a number of corridors within the city as scenic highways, drives, and historic streets. Designated streets and those under consideration for designation are listed in the "Distinctive City" Element of the City's General Plan.[1] The project site is not located on or near any such corridors and would not impact the quality of those streets during construction or during long-term operations. No impacts would occur.

c) Less than Significant Impact. The proposed industrial facility building has been designed according to City design guidelines, including requirements for architectural quality, landscaping, and screening, and would be consistent in character and quality with the surrounding industrial and commercial developments. The project site would undergo visual changes consistent with an ongoing construction project and would temporarily change the visual character of the site and surrounding area. However, the project would not substantially degrade the existing visual character and qualities of the site and its surroundings and would have a less than significant impact.

d) Less than Significant Impact. Excessive or inappropriately directed lighting can adversely impact night-time views by reducing the ability to see the night sky and stars. Glare can be caused by unshielded or misdirected lighting sources, or reflective surfaces. Impacts associated with glare range from a simple nuisance to potentially dangerous. Sources of daytime glare are typically concentrated in commercial areas and associated parking areas that contain reflective materials such as hi-efficiency window glass, highly polished surfaces, and expanses of pavement.

Development of parking improvements, related lighting, and associated glare prevention would be conducted in accordance with design standards in the City of Redlands Code of Ordinances; Chapter 18.112.260: Dust, Heat, and Glare Restrictions.[2] Glare is not expected to result from the increase in pavement or from the warehouse building. Adhering to Redlands Code of Ordinances would ensure any impacts related to excessive or inappropriately directed lighting would be less than significant.

4.2 – Agriculture and Forest 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 Incorporated	Less Than Significant Impact	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 California Important Farmland Finder prepared by the California Department of Conservation does not identify the project site as being located on prime farmland, unique farmland, or farmland of Statewide Importance.[3] The City of Redlands General Plan does identify portions of the north and eastern city for Agricultural and Open Space uses. The project site is located away from any

land zoned for agricultural uses, and there would be no conversion of farmlands to non-agricultural uses, and as a result the project would have no impact.

b) No Impact. The project site is not located on land that is used for or conflicts with nearby agriculturally zoned land. The project site is currently zoned Industrial District (I-P) which does not allow for agricultural uses.[4] The parcels comprising the project site are not involved in an active Williamson Act contract. There would be no conflict with existing zoning for agricultural use or a Williamson Act contract and therefore there would be no impact.

c) No Impact. Public Resources Code Section 12220(g) identifies forest land as *land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits*. The project site and surrounding properties are not currently being managed or used for forest land as identified in Public Resources Code Section 12220(g). The project site is zoned Light Industrial for various industrial uses that include warehousing, office space, storage, and manufacturing. As such, development of the project would have no impact on any timberland or forestland zoning.

d) No Impact. As indicated in 4.2 c), the area is not designated as forest land; thus, there would be no loss of forest land or conversion of forest land to non-forest use as a result of the project. No impacts would occur.

e) No Impact. The project site is currently occupied by a warehouse facility and (1) one single family home and is zoned for light industrial uses. The surrounding zoning designations include industrial zoning to the south and west, industrial and commercial zoning to the north, administrative zoning to the east, and public/institutional zoning to the southwest. None of the surrounding sites contain existing agricultural or forest uses. The development of this proposed project would not change the existing environment in a manner that would result in the conversion of forest land to non-forest use. No impact would occur.

4.3 – Air Quality

Where available, the significance criteria established by the applicable air quality management district 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 Incorporated	Less Than Significant Impact	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?	☐	☐	☑	☐

An *Air Quality, Health Risk, Greenhouse Gas, and Energy Impact Report* was prepared for the proposed project by LSA, dated January 2023 (See Appendix A). The report estimates the potential air quality emissions for the proposed project and evaluates project emissions against applicable South Coast Air Quality Management District (SCAQMD)-recommended California Environmental Quality Act (CEQA) significance thresholds for construction and operation.

a) Less than Significant Impact. A consistency determination plays an essential role in local agency project review by linking local planning and unique individual projects to the air quality plans. A consistency determination fulfills the CEQA goal of fully informing local agency decision-makers of the environmental costs of the project under consideration at a stage early enough to ensure that air quality concerns are addressed. Only new or amended General Plan elements, Specific Plans, and significantly unique projects need to undergo a consistency review due to the air quality plan strategy being based on projections from local General Plans.

The SCAQMD Air Quality Management Plan (AQMP) is based on regional growth projections developed by Southern California Association of Governments (SCAG). The proposed project would include 197,397 square feet of warehouse use. The proposed project would not house more than 1,000 persons, occupy more than 40 acres of land, or encompass more than 650,000 square feet of floor area. Thus, the proposed project would not be defined as a regionally significant project under CEQA; therefore, it does not meet SCAG's Intergovernmental Review criteria.

The City's General Plan is consistent with the SCAG Regional Comprehensive Plan Guidelines and the SCAQMD AQMP. Pursuant to the methodology provided in Chapter 12 of the SCAQMD CEQA Air Quality Handbook, consistency with the AQMP is affirmed if the project:

1. would not increase the frequency or severity of an air quality standards violation or cause a new violation
2. is consistent with the growth assumptions in the AQMP.

Consistency review is presented as follows:

Referring to Consistency Criterion 1; the project would result in short-term construction and long-term operational pollutant emissions that are all less than the CEQA significance emissions thresholds established by SCAQMD, as demonstrated below; therefore, the project would not result in an increase in the frequency or severity of an air quality standards violation or cause a new air quality standard violation.

Referring to Consistency Criterion 2; the CEQA Air Quality Handbook indicates that consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and significant projects. Significant projects include airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, water ports, solid waste disposal sites, and offshore drilling facilities; therefore, the proposed project is not defined as significant. In addition, the proposed project would not require a change to the General Plan land use designation or the current zoning and would be consistent with the City's General Plan and Zoning Ordinance. Therefore, the proposed project would be consistent with the growth assumptions set forth by SCAG and the AQMP.

Based on the consistency analysis presented above, the proposed project would be consistent with the regional AQMP, and impacts would be less than significant.

b) Less than Significant Impact. The Basin is designated as non-attainment for Ozone (O_3) and Particulate Matter less than 2.5 microns ($PM_{2.5}$) for federal standards and non-attainment for O_3, PM_{10}, and $PM_{2.5}$ for State standards. The SCAQMD's nonattainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, the SCAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Therefore, additional analysis to assess cumulative impacts is unnecessary. The following analysis assesses the potential project-level construction- and operation-related air quality impacts.

<u>Construction Emissions</u>
During construction, short-term degradation of air quality may occur due to the release of particulate emissions generated by demolition, grading, paving, building, and other activities. Emissions from construction equipment are also anticipated and would include carbon monoxide (CO), nitrogen oxides (NO_x), sulfur oxides (SO_x), volatile organic compounds (VOCs), directly-emitted particulate matter ($PM_{2.5}$ and PM_{10}), and toxic air contaminants (TACs) such as diesel exhaust particulate matter.

Project construction activities would include demolition, grading, site preparation, building, paving, and architectural coating activities. Construction-related effects on air quality from the proposed project would be greatest during the site preparation phase due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at the construction site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM_{10} emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM_{10} emissions would depend on soil moisture, silt content of soil, wind speed, and the amount of operating equipment. Larger dust particles would settle near the source, while fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. The SCAQMD has established Rule 403: Fugitive Dust, which would require the applicant to implement measures that would reduce the amount of particulate matter generated during the construction period.

In addition to dust-related PM_{10} emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, SO_2, NO_x, VOCs and some soot particulate ($PM_{2.5}$ and PM_{10}) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

Construction emissions were estimated for the project using CalEEMod. Table 2 lists the tentative project construction schedule beginning in June 2023 and ending in May 2024. Table 3 lists the potential construction equipment to be used during project construction under each phase of construction. Other precise details of construction activities are unknown at this time; therefore, default settings (e.g., construction equipment) from CalEEMod were assumed. Table 4 identifies the total annual emissions associated with construction activities. CalEEMod output sheets are included in Appendix A.

Table 2
Tentative Project Construction Schedule

Phase Number	Phase Name	Phase Start Date	Phase End Date	Number of Days/Week	Number of Days
1	Demolition	6/5/2023	8/31/2023	5	64
2	Site Preparation	9/1/2023	9/21/2023	5	15
3	Grading	9/22/2023	10/19/2023	5	20
4	Building Construction	10/20/2023	5/3/2024	5	141
5	Architectural Coating	2/26/2024	5/31/2024	5	70
6	Paving	5/6/2024	5/24/2024	5	15

Source: Compiled by LSA (November 2022).
[1] Overlap between building construction and architectural coating phases.

Table 3
Diesel Construction Equipment Utilized by Construction Phase

Construction Phase	Off-Road Equipment Type	Off-Road Equipment Unit Amount	Hours Used per Day	Horsepower	Load Factor
Demolition	Concrete/ Industrial Saws	1	8	81	0.73
	Excavators	3	8	158	0.38
	Rubber Tired Dozers	2	8	247	0.40
Site Preparation	Rubber Tired Dozers	3	8	247	0.40
	Tractors/Loaders/Backhoes	4	8	97	0.37
Grading	Excavators	2	8	158	0.38
	Graders	1	8	187	0.41
	Rubber Tired Dozers	1	8	247	0.40
	Scrapers	2	8	367	0.48
	Tractors/Loaders/Backhoes	2	8	97	0.37
Building Construction	Cranes	1	7	231	0.29
	Forklifts	3	8	89	0.20
	Generator Sets	1	8	84	0.74
	Tractors/Loaders/Backhoes	3	7	97	0.37
	Welders	1	8	46	0.45
Paving	Pavers	2	8	130	0.42
	Paving Equipment	2	8	132	0.36
	Rollers	2	8	80	0.38
Architectural Coating	Air Compressors	1	6	78	0.48

Source: Compiled by LSA using CalEEMod defaults (November 2022).
CalEEMod = California Emissions Estimator Model

Table 4
Project Construction Emissions

Project Construction	Maximum Pollutant Emissions (lbs./day)					
	VOC	NO_X	CO	SO_X	PM_{10}	PM2.5
Demolition	1.4	34.3	25.7	<0.1	2.7	1.2
Site Preparation	1.3	33.8	23.6	<0.1	10.0	5.5
Grading	2.3	69.0	42.6	0.2	8.6	4.0
Building Construction	1.8	26.3	25.0	0.1	3.2	1.5
Architectural Coating	26.8	2.4	3.0	<0.1	0.5	0.2
Paving	1.4	20.1	17.8	<0.1	0.8	0.7
Maximum (lbs./day)	**28.6**	**69.0**	**42.6**	**0.2**	**10.0**	**5.5**
SCAQMD Thresholds	75.0	100.0	550.0	150.0	150.0	55.0
Exceeds?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (January 2023).
Note: Maximum emissions of VOC occurred during the overlapping building construction and architectural coating phases.
CO = carbon monoxide lbs./day = pounds per day
SCAQMD = South Coast Air Quality Management District SOX = sulfur oxides PM10 = particulate matter less than 10 microns in size NOX = nitrogen oxides
PM2.5 = particulate matter less than 2.5 microns in size VOC = volatile organic compounds

As shown in Table 4, construction emissions associated with the project would not exceed the SCAQMD thresholds for VOC, NO_x, CO, SO_X, $PM_{2.5,}$ or PM_{10} emissions. In addition to the construction period thresholds of significance, the project is required to comply with regional rules that assist in reducing short-term air pollutant emissions. SCAQMD Rule 403 requires that fugitive dust be controlled with best-available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, SCAQMD Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off site. Even though the project's construction would not exceed any of the emissions thresholds as noted in Table 4, compliance with Rule 403 dust suppression techniques can further reduce the fugitive dust generation (and thus, the PM_{10} component). With compliance with Rule 403, construction of the proposed project would not result in emissions that would cause a cumulatively considerable net increase of any criteria pollutant for which the project is nonattainment under an applicable federal or State ambient air quality standard. Therefore, the proposed project would not lead to new or substantially more severe significant impacts associated with construction-related air quality, and as such, impacts would be less than significant.

Operational Emissions

Long-term air pollutant emission impacts are those associated with mobile sources (e.g., vehicle and truck trips), energy sources (e.g., natural gas), and area sources (e.g., architectural coatings and the use of landscape maintenance equipment) related to the proposed project. PM_{10} emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways. Entrainment of PM_{10} occurs when vehicle tires pulverize small rocks and pavement, and the vehicle wakes generate airborne dust. The contribution of tire and brake wear is small compared to the other PM emission processes. Gasoline-powered engines have small rates of PM emissions compared with diesel-powered vehicles. Energy source emissions result from activities in buildings for which electricity and natural gas are used. The quantity of emissions is the product of usage intensity (i.e., the amount of natural gas) and the emission factor of the fuel source. Major sources of energy demand for the proposed project could include building mechanical systems, such as heating and air conditioning. Typically, area source emissions consist of direct sources of air emissions located at the project site, including architectural coatings, consumer products, and the use of landscape maintenance equipment. Long-term operation emissions associated with the proposed project were calculated using CalEEMod. Model results are shown in Table 5 below. CalEEMod output sheets are included in Appendix A.

Table 5
Project Operational Emissions

Emission Type	Pollutant Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	PM2.5
Existing Uses Operational Emissions						
Area Sources	4.6	<0.1	0.6	<0.1	0.1	0.1
Energy Sources	<0.1	0.1	0.1	<0.1	<0.1	<0.1
Mobile Sources	3.9	20.6	40.7	0.1	8.9	2.5
Total Project Emissions	**8.5**	**20.7**	**41.4**	**0.1**	**9.0**	**2.6**
Proposed Project Operational Emissions						
Area Sources	4.5	<0.1	<0.1	0.0	<0.1	<0.1
Energy Sources	<0.1	0.4	0.3	<0.1	<0.1	<0.1
Mobile Sources – Vehicles/Light Duty Trucks	1.5	4.8	21.0	0.1	7.3	2.0
Mobile Sources – Heavy Duty Trucks	0.6	34.0	8.1	0.2	6.0	1.9
Total Project Emissions	**6.6**	**39.2**	**29.4**	**0.3**	**13.3**	**3.9**
Net Total Emissions	**-1.9**	**-18.5**	**-12.0**	**0.2**	**4.3**	**1.3**
SCAQMD Thresholds	55.0	55.0	550.0	150.0	150.0	55.0
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (January 2023).
Note: Maximum emissions of VOC occurred during the overlapping building construction and architectural coating phases.
CO = carbon monoxide
lbs/day = pounds per day
SCAQMD = South Coast Air Quality Management District
SOX = sulfur oxides
PM10 = particulate matter less than 10 microns in size
NOX = nitrogen oxides
PM2.5 = particulate matter less than 2.5 microns in size
VOC = volatile organic compounds

The results shown in Table 5 indicate the project would not exceed the significance criteria for VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$ emissions; thus, the proposed project would not have a significant effect on regional air quality. Therefore, operation of the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project is nonattainment under an applicable federal or State ambient air quality standard. Impacts would be less than significant.

c) Less than Significant Impact with Mitigation Incorporated. Sensitive receptors are defined as people that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include schools, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential dwelling units. The closest sensitive receptor to the project site is Redlands Adventist Academy Kindergarten and Kids Care, located approximately 275 feet southeast of the project site's southern boundary opposite West State Street. Other sensitive receptors include the Redlands Apartments, located approximately 900 feet southeast from the project site southern boundary.

The following section describes the potential impacts on sensitive receptors from construction and operation of the proposed project. Health risk impacts associated with project construction and operation are evaluated separately to correctly estimate the risk for each type of receptor (i.e., sensitive vs. worker locations, since sensitive receptors start at the 3rd trimester and workers start at age 16.) The risk is calculated starting at the 3rd trimester going to 30.25 years, which is broken down into three bins: 3rd trimester to under 2 years; 2 years to under 16 years; and 16 years to 30 years. This is consistent with OEHHA's standard method of calculating a 30-year risk (i.e., the sum of all three bins). The Health Risk Assessment (HRA) analysis and results are presented below; data outputs are included in Appendix A.

Construction Health Risk Assessment

A construction HRA, which evaluates construction-period health risk to off-site receptors, was performed for the proposed project. Table 6, below, identifies the results of the analysis assuming the use of Tier 2 construction equipment, as proposed by the project, at the maximally exposed individual (MEI), which is the nearest sensitive receptor. Model snapshots of the sources are shown in Appendix A.

Table 6
Unmitigated Health Risks from Project Construction to Off-Site Receptors

Location	Carcinogenic Inhalation Health Risk in One Million	Chronic Inhalation Hazard Index	Acute Inhalation Hazard Index
Worker Receptor Risk	3.31	0.162	0.000
Sensitive Receptor Risk	13.92	0.011	0.000
Day Care Receptor Risk	14.03	0.015	0.000
SCAQMD Significance Threshold	**10.0 in One Million**	**1.0**	**1.0**
Significant?	**Yes**	**No**	**No**

Source: LSA (January, 2023).
SCAQMD = South Coast Air Quality Management District

As shown in Table 6, the maximum cancer risk for the day care receptor MEI would be 14.03 in one million and the sensitive receptor MEI would be 13.92 in one million, which would both exceed the SCAQMD cancer risk threshold of 10 in one million. The worker receptor risk would be lower at 3.31 in one million, which would not exceed the threshold. The total chronic hazard index would be 0.162 for the worker receptor MEI, 0.015 for the day care receptor, and 0.011 for the sensitive receptor MEI, which would all be below the threshold of 1.0. In addition, the total acute hazard index would be nominal (0.000), which would also not exceed the threshold of 1.0. As indicated above, the cancer risk of 14.03 in one million at the day care receptor and 13.92 in one million at the sensitive receptor would exceed SCAQMD thresholds. Therefore, implementation of **Mitigation Measure AIR- 1** would be required to reduce pollutant concentrations during project construction. Table 7 identifies the results of the analysis with implementation of **Mitigation Measure AIR-1**.

Table 7
Mitigated Health Risks from Project Construction to Off-Site Receptors

Location	Carcinogenic Inhalation Health Risk in One Million	Chronic Inhalation Hazard Index	Acute Inhalation Hazard Index
Worker Receptor Risk	0.59	0.030	0.000
Sensitive Receptor Risk	2.49	0.002	0.000
Day Care Receptor Risk	2.55	0.003	0.000
SCAQMD Significance Threshold	10.0 in One Million	1.0	1.0
Significant?	No	No	No

Source: LSA (January, 2023).
SCAQMD = South Coast Air Quality Management District

As shown in Table 7, the mitigated cancer risk at the day care receptor MEI would be 2.55 in one million and 2.49 in one million at the sensitive receptor MEI, which would not exceed the SCAQMD cancer risk of 10 in one million. Therefore, with implementation of **Mitigation Measure AIR-1**, construction of the

proposed project would not exceed SCAQMD thresholds and would not expose nearby sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant.

Operational Health Risk Assessment

To determine the potential health risk to people living and working near the proposed project associated with the exhaust of diesel-powered trucks and equipment, an operational HRA was conducted for the proposed project. The carcinogenic and chronic health risks from the proposed project are shown in Table 8. The residential risk incorporates both the risk for a child living in a nearby residence for 9 years (the standard period of time for child risk) and an adult living in a nearby residence for 30 years (considered a conservative period of time for an individual to live in any one residence). The HRA model snapshots and outputs are included in Appendix A.

Table 8
Health Risks from Project Operation to Off-Site Receptors

Location	Carcinogenic Inhalation Health Risk in One Million	Chronic Inhalation Hazard Index	Acute Inhalation Hazard Index
Worker Receptor Risk	7.69	0.020	0.000
Sensitive Receptor Risk	7.49	0.004	0.000
Day Care Receptor Risk	8.05	0.003	0.000
SCAQMD Significance Threshold	**10.0 in one million**	**1.0**	**1.0**
Significant?	**No**	**No**	**No**

Source: LSA (January, 2023).
SCAQMD = South Coast Air Quality Management District

As shown in Table 8, the maximum cancer risk for the day care receptor MEI would be 8.05 in one million and the cancer risk for the sensitive receptor MEI would be 7.49 in one million, which would both be less than the threshold of 10 in one million. The worker receptor risk would be 7.69 in one million. The total chronic hazard index would be 0.004 for the sensitive receptor MEI, 0.003 for the day care receptor MEI, and 0.020 for the worker receptor MEI, all of which are below the threshold of 1.0. In addition, the total acute hazard index would be nominal (0.000), which would also not exceed the threshold of 1.0. As these results show, all health risk levels to nearby residents, workers, and the day care from operation-related emissions of TACs would be well below the SCAQMD's HRA thresholds. No significant health risk would occur from project operation emissions.

In December 2018, in the case of *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, (Friant Ranch) the California Supreme Court held that an air quality analysis must meaningfully connect the identified air quality impacts to the human health consequences of those impacts, or meaningfully explain why that analysis cannot be provided. As discussed in the SCAQMD Brief filed in the Friant Ranch case, correlating a project's criteria air pollutant emissions to specific health impacts is challenging. The SCAQMD, which has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the State, and thus it is uniquely situated to express an opinion on how lead agencies should correlate air quality impacts with specific health outcomes noted that it may be "difficult to quantify health impacts for criteria pollutants." SCAQMD used O_3 as an example of why it is impracticable to determine specific health outcomes from criteria pollutants for all but very large, regional-scale projects.

First, forming O_3 "takes time and the influence of meteorological conditions for these reactions to occur, so ozone may be formed at a distance downwind from the sources." Second, "it takes a large amount of additional precursor emissions (NOx and VOCs) to cause a modeled increase in ambient ozone

levels over an entire region," with a 2012 study showing that "reducing NOx by 432 tons per day (157,680 tons/year) and reducing VOC by 187 tons per day (68,255 tons/year) would reduce ozone levels at the SCAQMD's monitor site with the highest levels by only 9 parts per billion"

SCAQMD concluded that it "does not currently know of a way to accurately quantify ozone-related health impacts caused by NOx or VOC emissions from relatively small projects." The San Joaquin Valley Air Pollution Control District (SJVAPCD) ties the difficulty of correlating the emission of criteria pollutants to health impacts to how ozone and particulate matter are formed, stating that "[b]ecause of the complexity of ozone formation, a specific tonnage amount of NOx or VOCs emitted in a particular area does not equate to a particular concentration of ozone in that area." Similarly, the tonnage of PM "emitted does not always equate to the local PM concentration because it can be transported long distances by wind," and "[s]econdary PM, like ozone, is formed via complex chemical reactions in the atmosphere between precursor chemicals such as SOx and NOx," meaning that "the tonnage of PM-forming precursor emissions in an area does not necessarily result in an equivalent concentration of secondary PM in that area." The disconnect between the amount of precursor pollutants and the concentration of ozone or PM formed makes it difficult to determine potential health impacts, which are related to the concentration of ozone and PM experienced by the receptor rather than levels of NOx, SOx, and VOCs produced by a source.

Most local agencies lack the data to do their own assessment of potential health impacts from criteria air pollutant emissions, as would be required to establish customized, locally specific thresholds of significance based on potential health impacts from an individual development project. The use of national or "generic" data to fill the gap of missing local data would not yield accurate results because such data does not capture local air patterns, local background conditions, or local population characteristics, all of which play a role in how a population experiences air pollution. Because it is impracticable to accurately isolate the exact cause of a human disease (for example, the role a particular air pollutant plays compared to the role of other allergens and genetics in cause asthma), existing scientific tools cannot accurately estimate health impacts of the project's air emissions without undue speculation. As previously stated, no significant health risk would occur from project operation emissions, and as such, impacts would be less than significant.

d) Less than Significant Impact. According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints include agricultural operations, wastewater treatment plants, landfills, and certain industrial operations (such as manufacturing uses that produce chemicals, paper, etc.). During project construction, some odors may be present due to diesel exhaust. However, these odors would be temporary and limited to the construction period. The proposed project would not include any activities or operations that would generate objectionable odors and once operational, the project would not be a source of odors. Therefore, the proposed project would not result in other emissions (such as those leading to odors) affecting a substantial number of people. Impacts would be less than significant.

Mitigation Measures

AIR-1: During construction of the proposed project, the project contractor shall ensure all off-road diesel-powered construction equipment of 50 horsepower or more used for the project is equipped with Level 3 diesel particulate filters or equivalent.

4.4 - Biological Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☑	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, 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?	☐	☐	☑	☐

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 Impact. The project site is significantly disturbed and is almost completely developed. The site is occupied by a residential property and the old La-Z-Boy facility. The Project site is not identified as critical habitat for any sensitive, threatened, or endangered species. Landscaping currently exists onsite; however, the ornamental vegetation is not native habitat. Onsite vegetation includes landscape ornamental trees, and shrubs. Considering the highly developed and disturbed nature of the project site the proposed project would not result in any significant impacts to sensitive species or their habitats.

Special-Status Plants

No special-status plant species are expected to be present on the project site due to the extent of current development and subsequent lack of suitable habitat; therefore, no impacts to special-status plants are anticipated as a result of project implementation.

Special Status Wildlife Species

Special-status wildlife species include those species listed as endangered or threatened under the Federal Endangered Species Act (FESA) or the California Endangered Species Act (CESA); candidates for listing by the U.S. Fish and Wildlife Services or California Department of Fish and Wildlife (USFWS & CDFW respectively); and species of special concern to the CDFW; and birds protected by the CDFW under California Fish and Game Code (CFGC) Sections 3503 and 3513.

No special-status wildlife species are expected to be impacted by project construction due to a lack of suitable habitat and high degree of site disturbance from existing development within and surrounding the project site.

b) No Impact. The project site is located in a heavily developed area of Redlands, and no riparian vegetation or other sensitive natural habitats are present on the project site as indicated in the City's General Plan.[5] Furthermore, no such features were detected by the National Wetlands Inventory at or near the project site.[6] As such, there will be no impacts.

c) No Impact. No state or federally protected wetlands or similar waterways are present on the project site. No wetlands were identified by the National Wetlands Inventory, or the City's General Plan at or near the project site.[7] There is a human-made channel, the Mission Channel, that moves seasonal stream waters immediately north of the project. The proposed project would not impact this waterway as project disturbances would not extend beyond the site boundary. Therefore; there would be no impacts related to wetlands.

d) Less than Significant with Mitigation Incorporated. The City does not maintain any wildlife corridors and the project site is surrounded on all sides by development and surface street features. The Federal Migratory Bird Treaty Act (MBTA; 16 USC sections 703–711) and California Fish and Game Code (CFGC) sections 3503, 3503.5, and 3513 extend protection to many avian species known to occur in the project area. The Eucalyptus trees that would be removed as part of the proposed project are ornamental; however, ornamental trees still have the potential to provide nesting habitat for bird species protected by the CFGC sections 3503 and 3513. In addition, there is potential

for tree-nesting birds to establish nests in the Eucalyptus trees prior to project-related construction. The loss of an active nest of common or special-status bird species and/or their eggs or young as a result of project construction would be considered a violation of the CFGC, section 3503, 3503.5, 3513 and therefore, would be considered a potentially significant impact. Therefore, implementation of **Mitigation Measure BIO-1** would be required to reduce impacts to nesting birds to a less than significant level.

e) Less than Significant Impact. The project would not conflict with local policies or ordinances protecting biological resources. During construction operations, trees and other plant varieties will need to be removed to accommodate current building designs and construction. The removal of trees and plants during construction activities will not interfere with Redlands' Tree Protection Guidelines as outlined in the City's Municipal Code.[8] The Guidelines are applicable to "Native or Specimen trees, Landmark trees, and Public Trees" as defined by the City. Trees on the project site have not been designated as native or specimen by the City, are not of any historic significance that would warrant a landmark designation, and trees on the project site are not located on public land, and do not qualify as public trees. Impacts will be less than significant.

f) No Impact. The City of Redlands is an active participant in the Upper Santa Ana River Wash Habitat Conservation Plan (the Wash Plan).[9] The project site is located south of the plan, outside of its boundaries. The project site is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other local, regional, or state habitat conservation plan. No impacts would occur.

Mitigation Measures

BIO-1: If vegetation removal is scheduled during the nesting season (typically February 1 to September 1), then a focused survey for active nests shall be conducted by a qualified biologist no more than five (5) days before the beginning of project-related activities (e.g., demolition, excavation, grading and vegetation removal). Surveys must be conducted in proposed work areas, staging and storage areas, and soil, equipment, and material stockpile areas. For passerines and small raptors, surveys must be conducted within a 250-foot radius surrounding the work area (in non-developed areas and where access is feasible). For larger raptors, such as those from the genus *Buteo*, the survey area must encompass a 500-foot radius. Surveys must be conducted by a qualified biologist during weather conditions suited to maximize the observation of possible nests and concentrate on areas of suitable habitat. If a lapse in project-related work of five days or longer occurs, an additional nest survey is required before work can be reinitiated. If nests are encountered during any preconstruction survey, a qualified biologist must determine if it may be feasible for construction to continue as planned without impacting the success of the nest, depending on conditions specific to each nest and the relative location and rate of construction activities. Any nest(s) within the project site shall be monitored by a qualified biologist during vegetation removal if work is occurring directly adjacent to the pre-determined no-work buffer. If the qualified biologist determines construction activities have potential to adversely affect a nest, the biologist will immediately inform the construction manager to halt construction activities within minimum exclusion buffer of 50 feet for songbird nests, and 200 to 500 feet for raptor nests, depending on species and location. Construction activities within the no-work buffer may proceed after a qualified biologist determines the nest is no longer active due to natural causes (e.g., young have fledged, predation or other non-anthropogenic nest failure).

4.4 – Cultural Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 dedicated cemeteries?	☐	☑	☐	☐

A *Historical/Archaeological Resource Survey Report* was conducted to assess possible cultural and historical impacts associated with the construction and operation of the project (see Appendix B). The survey was prepared by CRM Tech on February 15th, 2023, and is attached as Appendix B.

a) No Impact. CEQA Guidelines state the term "historical resources" applies to resources that meet any of the criteria for listing on the California Register of Historical Resources.

(1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
(2) Is associated with the lives of persons important in our past.
(3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
(4) Has yielded, or may be likely to yield, information important in prehistory or history. (PRC §5024.1(c)).

According to the records search and site visits conducted through the survey, the project site does not include any structure that could be considered historic in nature. In addition, according to the Historical Survey, neither the Former La-Z-Boy Plant nor the unoccupied single-family residence at 360 Kansas Street meet any of the criteria for listing in the California Register of Historical Resources or for local designation, and neither structure qualifies as a "historical resource." Therefore, the project would not result in any adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5 and no impacts would occur.

b) Less than Significant with Mitigation Incorporated. Given that the project site has been substantially disturbed by development over time, any archaeological resources that may exist likely have been previously unearthed, disturbed, or left in place. As such, significant surficial and subsurface archaeological resources are unlikely to occur on the Project site or be encountered during earthwork activities. However, in the unlikely event that archeological materials are uncovered during ground-disturbing activities, and at the request of the Yuhaaviatam of San Manuel Nation (formerly known as the San Manuel Band of Mission Indians), **Mitigation Measures CUL-1 and CUL-2** have been

incorporated to reduce potentially significant impacts. With implementation of Mitigation Measures **CUL-1 and CUL-2**, impacts will be less than significant as a result of construction of the proposed Project.

c) Less than Significant with Mitigation Incorporated. No known human remains are anticipated to be located on or beneath the project site. However, these findings do not preclude the existence of previously unknown human remains located below the ground surface, which may be encountered during construction excavations associated with the project, and it is possible to encounter buried human remains during construction. At the request of the Yuhaaviatam of San Manuel Nation (formerly known as the San Manuel Band of Mission Indians), **Mitigation Measure CUL-3** has been incorporated to reduce potentially significant impacts to previously unknown human remains that may be unexpectedly discovered during project implementation. In the unlikely event that human remains are uncovered the contractor is required to halt work in the immediate area of the find and to notify the County Coroner, in accordance with Health and Safety Code § 7050.5, who must then determine whether the remains are of forensic interest. If the Coroner, with the aid of a supervising archaeologist, determines that the remains are or appear to be of a Native American, they must contact the Yuhaaviatam of San Manuel Nation Cultural Resources Department for further investigations and proper recovery of such remains, if necessary. With implementation of **Mitigation Measure CUL-3**, impacts will be less than significant as a result of construction of the proposed Project.

Mitigation Measures

CUL-1: In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, as detailed within TCR-1, regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.

CUL-2: If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to YSMN for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.

CUL-3: If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.

4.5 – Energy

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption or energy resources, during project construction or operation?	☐	☐	☑	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☑	☐

An *Air Quality, Health Risk, Greenhouse Gas, and Energy Impact Report* was prepared for the proposed project by LSA, dated January 2023 (See Appendix A) to evaluate the potential air quality, energy and greenhouse gas impacts associated with the construction and operation of the proposed project. This report is consistent with the guidance and recommendations contained in the South Coast Air Quality Management District's (SCAQMD) California Environmental Quality Act (CEQA) Air Quality Handbook. The information presented below is condensed from the report prepared by LSA in December 2022 and is attached as Appendix A.

a) Less than Significant Impact. Implementation of the proposed project would result in the consumption of electricity, natural gas, and petroleum fuels during construction and operation of the business park / warehousing land uses.

Construction Energy Use

Construction of the proposed project is assumed to begin in June 2023 and end in May 2024. The project would require energy for activities such as the manufacture and transportation of building materials, grading activities, and building construction. Construction of the proposed project would require electricity to power construction-related equipment. Construction of the proposed project would not involve the consumption of natural gas. The construction-related equipment would not be powered by natural gas, and no natural gas demand is anticipated during construction. Transportation energy represents the largest energy use during construction and would occur from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction worker vehicles that would use petroleum fuels (e.g., diesel fuel and/or gasoline). Therefore, the analysis of energy use during construction focuses on fuel consumption. Construction trucks and vendor trucks hauling materials to and from the project site would be anticipated to use diesel fuel, whereas construction workers traveling to and from the project site would be anticipated to use gasoline-powered vehicles. Fuel consumption from transportation uses depends on the type and number of trips, vehicle miles travelled (VMT), the fuel efficiency of the vehicles, and the travel mode. Estimates of fuel consumption (diesel fuel and gasoline) from construction equipment, construction trucks, and construction worker vehicles were based on default construction equipment assumptions and trip estimates from CalEEMod and fuel efficiencies from EMFAC2021. Fuel consumption estimates are presented in Table 9, below.

Table 9
Proposed Project Energy Consumption Estimates During Construction

Energy Type	Total Fuel Consumption	Percentage of Increase Countywide
Diesel Fuel (total gallons)	68,917.10	0.02
Gasoline (total gallons	30,348.00	<0.01
Source: LSA, 2023.		

As indicated in Table 9, the project would consume approximately 68,917.1 gallons of diesel fuel and approximately 30,348.0 gallons of gasoline during construction. Based on fuel consumption obtained from CARB's California Emissions Factor Model, Version 2021 (EMFAC2021), approximately 321.6 million gallons of diesel and approximately 915.5 million gallons of gasoline are estimated to have been consumed from vehicle trips in San Bernardino County in 2022. Therefore, construction of the proposed project would increase the annual construction generated fuel use in San Bernardino County by approximately 0.02 percent for diesel fuel usage and by less than 0.01 percent for gasoline fuel usage. As such, project construction would have a negligible effect on local and regional energy supplies. Furthermore, impacts related to energy use during construction would be temporary and relatively small in comparison to San Bernardino County's overall use of the State's available energy resources. No unusual project characteristics would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in the region or the State. In addition, construction activities are not anticipated to result in an inefficient use of energy as gasoline and diesel fuel would be supplied by construction contractors who would conserve the use of their supplies to minimize their costs on the project. The project would not cause or result in the need for additional energy facilities or an additional or expanded delivery system. For these reasons, fuel consumption during construction would not be inefficient, wasteful, or unnecessary, and impacts would be less than significant.

Operational Energy Use

Operational energy use is typically associated with natural gas use, electricity consumption, and fuel used for vehicle trips associated with a project. Energy consumption was estimated for the proposed project using default energy intensities by land use type in CalEEMod. The proposed project would also result in energy usage associated with gasoline and diesel fuel consumed by project-related vehicle and truck trips. Fuel use associated with vehicle and truck trips generated by the proposed project was calculated based on the project's Traffic Impact Analysis 59, which identifies that the existing conditions typically generate approximately 928 average daily trips and that the proposed project would generate approximately 962 average daily trips, including 681 passenger vehicle trips, 55 two-axle truck trips, 54 three-axle truck trips, and 172 four-axle truck trips. The amount of operational fuel use was estimated using CARB's EMFAC2021 model, which provided projections for typical daily fuel usage in San Bernardino County. Electricity, natural gas, and fuel usage estimates associated with the proposed project are shown in Table 10, below.

As shown in Table 10, the estimated potential net increase in electricity demand associated with the operation of the proposed project is 612,787 kWh per year. Total electricity consumption in San Bernardino County in 2020 was 15,968.5 GWh (15,968,515,536 kWh). Therefore, operation of the proposed project would increase the annual electricity consumption in San Bernardino County by less than 0.01 percent. As also shown in Table 10, the estimated potential net increase in natural gas demand associated with operation of the proposed project is 8,559.3 therms per year. Natural gas consumption in San Bernardino County in 2020 was 527 million therms (527,236,428 therms). Therefore, operation of the proposed project would negligibly increase the annual natural gas consumption in San Bernardino County by less than 0.01 percent.

Table 10
Energy Consumption Estimates During Project Operation

Energy Type	Annual Energy Consumption
Existing Use Operational Energy Consumption	
Electricity Consumption (kWh/year)	623,199.0
Natural Gas Consumption (therms/year)	5,225.9
Proposed Project Operational Energy Consumption	
Electricity Consumption (kWh/year)	1,235,986.0
Natural Gas Consumption (therms/year)	13,785.2
Net Electricity Consumption	612,787.0
Net Natural Gas Consumption	8,559.3
Existing Uses Automotive Fuel Consumption	
Gasoline (gallons/year)	270,581.1
Diesel Fuel (gallons/year)	150,360.6
Proposed Project Automotive Fuel Consumption	
Gasoline (gallons/year)	207,395.2
Diesel Fuel (gallons/year)	272,935.6
Net Gasoline Consumptions	-63,185.9
Net Diesel Fuel Consumption	122,563.0
Source: LSA, 2023.	

Electrical and natural gas demand associated with project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. Furthermore, the proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. The project would be required to adhere to all federal, State, and local requirements for energy efficiency, including the Title 24 standards. Title 24 building energy efficiency standards establish minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting, which would reduce energy usage.

As shown in Table 10, fuel consumption associated with the vehicle trips generated by the proposed project would result in a net decrease of approximately 63,185.9 gallons of gasoline and a net increase of approximately 122,563.0 gallons of diesel from existing conditions. This analysis conservatively assumes that all vehicle trips generated as a result of project operation would be new to San Bernardino County. Based on fuel consumption obtained from EMFAC2021, approximately 321.6 million gallons of diesel and approximately 915.5 million gallons of gasoline will be consumed from vehicle trips in San Bernardino County in 2022. Therefore, vehicle and truck trips associated with the proposed project would increase the annual fuel use in San Bernardino County by approximately less than 0.01 percent for gasoline fuel usage and approximately 0.04 percent for diesel fuel usage. Fuel consumption associated with vehicle trips generated by project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region, and as such, impacts would be less than significant.

b) Less than Significant Impact. In 2002, the Legislature passed SB 1389, which required the CEC to develop an integrated energy plan every two years for electricity, natural gas, and transportation fuels

for the Integrated Energy Policy Report. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for ZEVs and their infrastructure needs, and encouragement of urban designs that reduce VMT and accommodate pedestrian and bicycle access.

The CEC's 2021 Integrated Energy Policy Report and 2022 Integrated Energy Policy Report Update provide the results of the CEC's assessments of a variety of energy issues facing California. As indicated above, energy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the overall use in the County. In addition, energy usage associated with operation of the proposed project would be relatively small in comparison to the overall use in San Bernardino County, and the State's available energy resources. Therefore, energy impacts at the regional level would be negligible. Because California's energy conservation planning actions are conducted at a regional level, and because the proposed project's total impact on regional energy supplies would be minor, the proposed project would not conflict with or obstruct California's energy conservation plans as described in the CEC's Integrated Energy Policy Report. Additionally, as demonstrated above, the proposed project would not result in the inefficient, wasteful, and unnecessary consumption of energy. Potential impacts related to conflict with or obstruction of a State or local plan for renewable energy or energy efficiency would be less than significant.

4.6 – Geology and Soils

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 18-1-B of the Uniform Building Code (1997), creating substantial direct or indirect risks to life or property?	☐	☐	☑	☐

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☑
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☑	☐	☐

a.i) Less than Significant Impact. The City of Redlands is located in a known fault zone according to the Alquist-Priolo Earthquake Fault Zoning Map. Redlands is between the San Andreas fault zone to the northeast, and the San Jacinto fault zone (also referred to as the Loma Linda Fault) to the southwest. The project site is not located within a designated Alquist-Priolo designated fault zone.[10] The Crafton Hills fault zone, also referred to as the Redlands Fault, traverses through the southeastern portion of the city. The project site is located approximately 2 miles northwest of the Crafton Hills fault zone. Redlands is located in a seismically active region with a high potential for seismic hazards and damage to occur. According to the City General Plan, development should be restricted within and near Alquist-Priolo designated fault zones.[11] Furthermore, structures should incorporate design standards recommended by the most current California Building Code (CBC). The project is not located on or near a Alquist-Priolo fault zone, and would adhere to design and repair requirements adopted in the current City of Redlands Code of Ordinances from the 2019 CBC.[12] Design requirements adopted by the city would be sufficient in mitigating seismic hazards to the proposed project, and as such, impacts are determined to be less than significant.

a.ii) Less than Significant Impact. The project site is subject to ground shaking given its proximity to fault zones and Southern California location. Per the City's General Plan, the potential for ground shaking and seismic-related damages are also dependent on the underlying soil composition.[13] The City is built on alluvium materials that can intensify ground shaking. The project site is of no greater risk to ground shaking than another area of Redlands, and while a structure may be damaged during an earthquake, adherence to design requirements adopted from the CBC would minimize damage to property within the structure, as they are designed to not collapse. The CBC is intended to provide minimum requirements to prevent major structural failure and loss of life. Impacts due to ground shaking would be less than significant.

a.iii) Less than Significant Impact. Liquefaction is a form of ground failure that occurs when soil transforms from a solid state to liquefied condition due to intense seismic ground shaking. Liquefaction typically occurs in loose granular materials, such as alluvium-type soils. Saturated soils or areas located near waterways and areas with a high groundwater level are also susceptible to such ground failure. Parts of the City of Redlands are susceptible to liquefaction and ground failure from seismically induced ground shaking. However, the City's General Plan indicates that the project site is not located in an area considered susceptible to liquefaction.[14] Impacts related to seismic-related ground failure and liquefaction will be less than significant.

a.iv) No Impact. The City's General Plan outlines areas in Redlands susceptible to landslides. According to the Healthy Community Element of the Redlands General Plan, the project site is not located in an area with high susceptibility, or even low to medium susceptibility, to landslide or ground subsidence.[15] There are no anticipated impacts related to landslides.

b) Less than Significant Impact. Topsoil is used to cover surface areas for the establishment and maintenance of vegetation due to its high concentrations of organic matter and microorganisms. The project site is located in an already developed area of Redlands, although there is the potential to expose surface soils to wind and water erosion during demolition and construction activities. However, wind erosion would be minimized through soil stabilization measures required by SCAQMD Rule 403 (Fugitive Dust), such as daily watering.[16] Stormwater related erosion would further be prevented through control practices outlined in the Redlands NPDES program.[17] Following project construction, the site itself would consist of mostly impervious surfaces and landscaping. Impacts related to soil erosion would be less than significant with the implementation of existing regulations.

c) Less than Significant Impact. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The downslope movement is due to a combination of gravity and ground shaking. Lateral spreading has been observed to generally take place toward a free face (i.e., retaining wall, slope, or channel) and to lesser extent on ground surfaces with a very gentle slope. As previously discussed, the project site is in an area with a low susceptibility to liquefaction, and thus a low potential for lateral spreading to occur on the project site. The project site is located in a flat developed area, and any soil instability on the project site would not cause landslides. The project is required to be constructed in accordance with the CBC, and keeping in compliance with existing CBC regulations would limit hazard impacts arising from unstable soils to less than significant levels.

d) Less than Significant Impact. Construction of the proposed project is required to comply with the California Building Code (CBC); requiring building permits constructed to comply with current building code standards. These standards include consideration of geological and seismic conditions. Soil conditions at the site would be identified and considered as part of the design process. Compliance with existing CBC regulations would limit hazard impacts arising from liquefaction, landslides, lateral spreading, and unstable soils to less than significant.

e) No Impact. The project proposes to install new onsite water and sewer lines that would connect to the existing municipal sewer infrastructure in the surrounding streets. The underground chambers will be in the northwesterly landscape area and fully infiltrate the water volume. The proposed project would connect to this system and would not require the use of septic tanks. No impact will occur.

f) Less than Significant with Mitigation Incorporated. The proposed project site is currently developed in an urbanized area and therefore has no unique paleontological or geological resources on or near it. Development of the proposed warehouse will require demolition of the existing buildings, as well as site preparation, grading, and construction operations. Given that the proposed project site has been previously disturbed, it is considered unlikely that paleontological resources (fossil evidence of life from past geologic time frames) will be found. However, in the event that paleontological materials are uncovered, **Mitigation Measure GEO-1** is incorporated to ensure that uncovered resources are evaluated and curated as recommended by a qualified paleontologist. Impacts to paleontological resources would be less than significant with mitigation incorporation.

Mitigation Measures

GEO-1: If paleontological materials are uncovered during grading or other earth moving activities, the contractor shall be required to halt work in the immediate area of the find, and to retain a professional paleontologist to examine the materials to determine whether it is a significant paleontological resource. If this determination is positive, the resource shall be left in place, if determined feasible by the project paleontologist. Otherwise, the scientifically consequential information shall be fully recovered by the paleontologist. Work may continue outside of the area of the find; however, no further work shall occur

in the immediate location of the find until all information recovery has been completed and a report concerning it filed with the Community Development Director. The applicant shall bear the cost of implementing this mitigation.

4.7 – Greenhouse Gas Emissions

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 purpose of reducing the emissions of greenhouse gases?	☐	☐	☑	☐

An *Air Quality, Health Risk, Greenhouse Gas, and Energy Impact Report* was prepared to evaluate the potential air quality, energy and greenhouse gas impacts associated with the construction and operation of the proposed project (see Appendix A). This report is consistent with the guidance and recommendations contained in the South Coast Air Quality Management District's (SCAQMD) California Environmental Quality Act (CEQA) Air Quality Handbook. The information presented below is condensed from the report prepared by LSA in December 2022 and is attached as Appendix A.

a) Less than Significant Impact. Gases that trap heat in the atmosphere and affect regulation of the earth's temperature are known as GHG. Many chemical compounds found in the earth's atmosphere exhibit the GHG property. GHG's allow sunlight to enter the atmosphere freely. When sunlight strikes the earth's surface, it is either absorbed or reflected back toward space. Earth that has absorbed sunlight warms up and emits infrared radiation toward space. GHG absorbs this infrared radiation and "trap" the energy in the earth's atmosphere.

GHG that contribute to climate change are a different type of pollutant than criteria or hazardous air pollutants because climate change is global in scale, both in terms of causes and effects. Some GHG are emitted to the atmosphere naturally by biological and geological processes such as evaporation (water vapor), aerobic respiration (carbon dioxide), and off-gassing from low oxygen environments such as swamps or exposed permafrost (methane); however, GHG emissions from human activities such as fuel combustion (e.g., carbon dioxide) and refrigerants use (e.g., hydrofluorocarbons) significantly contribute to overall GHG concentrations in the atmosphere, climate regulation, and global climate change. The Earth's average near-surface atmospheric temperature rose 0.6 ± 0.2° Celsius (°C) or 1.1 ± 0.4° Fahrenheit (°F) in the 20th century. The prevailing scientific opinion on climate change is that most of the warming observed over the last 50 years is attributable to human activities. The increased amounts of carbon dioxide (CO_2) and other GHGs are the primary causes of the human-induced component of warming. GHGs are released by the burning of fossil fuels, land clearing, agriculture, and other activities, and lead to an increase in the greenhouse.

The 1997 United Nations' Kyoto Protocol international treaty set targets for reductions in emissions of four specific GHG – carbon dioxide, methane, nitrous oxide, and sulfur hexafluoride – and two groups of gases – hydrofluorocarbons and perfluorocarbons. These GHG are the primary GHG emitted into the atmosphere by human activities. Water vapor is also a common GHG that regulates the earth's

temperature; however, the amount of water vapor in the atmosphere can change substantially from day to day, whereas other GHG emissions remain in the atmosphere for longer periods of time. Black carbon consists of particles emitted during combustion; although a particle and not a gas, black carbon also acts to trap heat in the Earth's atmosphere. The six common GHG are described below.

- **Carbon Dioxide (CO_2)**. CO_2 is released to the atmosphere when fossil fuels (oil, gasoline, diesel, natural gas, and coal), solid waste, and wood or wood products are burned.
- **Methane (CH_4)**. CH_4 is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in municipal solid waste landfills and the raising of livestock.
- **Nitrous Oxide (N_2O)**. N_2O is emitted during agricultural and industrial activities, as well as during combustion of solid waste and fossil fuels.
- **Sulfur Hexafluoride (SF_6)**. SF_6 is commonly used as an electrical insulator in high voltage electrical transmission and distribution equipment such as circuit breakers, substations, and transmission switchgear. Releases of SF_6 occur during maintenance and servicing as well as from leaks of electrical equipment.
- **Hydrofluorocarbons (HFCs) and Perfluorocarbons (PFCs)**. HFCs and PFCs are generated in a variety of industrial processes. Although the amount of these gases emitted into the atmosphere is small in terms of their absolute mass, they are potent agents of climate change due to their high global warming potential.

GHG can remain in the atmosphere long after they are emitted. The potential for a particular greenhouse gas to absorb and trap heat in the atmosphere is considered its global warming potential (GWP). The reference gas for measuring GWP is CO_2, which has a GWP of one. By comparison, CH_4 has a GWP of 28, which means that one molecule of CH_4 has 28 times the effect on global warming as one molecule of CO_2. Multiplying the estimated emissions for non-CO_2 GHG by their GWP determines their CO_2 equivalent (CO_2e), which enables a project's combined GWP to be expressed in terms of mass CO_2 emissions.

Project GHG Emissions

The City of Redlands total emissions were 419,417 $MTCO_2e$ per year in 2015. The emissions inventory covers direct and indirect GHG emissions from sources within the boundaries of Redlands. The emissions inventory tallies emissions from ten sectors. The largest sector is transportation at approximately 41 percent, followed by residential and commercial sectors at approximately 23 and 17 percent, respectively. Off-road equipment is 8 percent of the total emissions. Industrial and solid wastes are 5 percent and 4 percent of the total emissions, respectively. Public lighting, water transport, distribution and treatment, and wastewater are all less than 1 percent of the total emissions.

Short-term Emissions

Construction activities associated with the proposed project would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O. Furthermore, CH_4 is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

As indicated above, the SCAQMD does not have an adopted threshold of significance for construction-related GHG emissions. However, lead agencies are required to quantify and disclose GHG emissions that would occur during construction. The SCAQMD then requires the construction GHG emissions to

be amortized over the life of the project, defined by the SCAQMD as 30 years[i], added to the operational emissions, and compared to the applicable interim GHG significance threshold tier.

Using CalEEMod, it is estimated that the project would generate approximately 690.1 $MTCO_2e$ during construction of the project. When annualized over the 30-year life of the project, annual emissions would be 23.0 $MTCO_2e$. Table 11 lists the construction GHG emissions (details are provided in the CalEEMod output in Appendix A). Construction emissions would be temporary in nature and would only occur for the duration of the construction period.

Table 11
Construction Greenhouse Gas Emissions

Construction Year	Annual Emissions (MT/yr.)			
	CO_2	CH_4	N_2O	CO_2e
2023	428.0	0.1	<0.1	436.7
2024	249.9	<0.1	<0.1	253.4
Total Construction GHG Emissions				**690.1**
Amortized Annual Construction GHG Emissions				**23.0**

Source: Compiled by LSA (January 2023).
MT/yr. = metric tons per year
N_2O = nitrous oxide
CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent

Long-term Emissions

Long-term GHG emissions are typically generated from mobile sources (e.g., vehicle trips), area sources (e.g., maintenance activities and landscaping), indirect emissions from sources associated with energy consumption, waste sources (land filling and waste disposal), and water sources (water supply and conveyance, treatment, and distribution). Mobile-source GHG emissions would include project-generated vehicle and truck trips to and from the project. Area-source emissions would be associated with activities such as landscaping and maintenance on the project site. Energy source emissions would be generated at off-site utility providers because of increased electricity demand generated by the project. Waste source emissions generated by the proposed project include energy generated by land filling and other methods of disposal related to transporting and managing project-generated waste. In addition, water source emissions associated with the proposed project are generated by water supply and conveyance, water treatment, water distribution, and wastewater treatment. Following guidance from the SCAQMD, GHG emissions were estimated for the operational year of 2024 using CalEEMod. Table 12 shows the calculated GHG emissions for the proposed project.

[i] The SCAQMD has identified the average operational lifespan of buildings to be 30 years. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf [accessed November 2022].

Table 12
Greenhouse Gas Emissions

Emissions Source	Operational Emissions (MT/yr.)				
	CO_2	CH_4	N_2O	CO_2e	% of Total
Existing Uses					
Area Sources	<0.1	<0.1	<0.1	0.3	<1
Energy Sources	138.4	<0.1	<0.1	139.1	5
Mobile Sources	2,255.6	<0.1	<0.1	2,327.2	86
Waste Sources	37.2	2.2	0.0	92.1	3
Water Sources	117.8	1.5	<0.1	165.1	6
Total Existing Uses Emissions				**2,723.8**	**100**
Proposed Project Emissions					
Area Sources	<0.1	<0.1	0.0	<0.1	<1
Energy Sources	292.7	<0.1	<0.1	294.3	6
Mobile Sources – Vehicles/Light Duty Trucks	1,199.1	<0.1	<0.1	1,218.8	24
Mobile Sources – Heavy Duty Trucks	3,099.5	0.1	0.5	3,249.2	65
Waste Sources	37.7	2.2	0.0	93.4	2
Water Sources	124.3	1.5	<0.1	172.5	3
Total Project Operational Emissions				**5,028.2**	**100**
Amortized Construction Emissions				23.0	-
Total Annual Emissions				**5,051.2**	-
Total Net Annual Emissions				**2,304.4**	-
SCAQMD Threshold				3,000	-
Exceed Threshold?				**No**	-

Source: Compiled by LSA (January 2023).
MT/yr. = metric tons per year
N_2O = nitrous oxide
CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent

As discussed above, a project would have less than significant GHG emissions if it would result in operational-related GHG emissions of less than 3,000 MT CO_2e/yr. Based on the analysis results, the proposed project would result in an increase of approximately 2,304.4 MT CO_2e/yr. Therefore, operation of the proposed project would not generate significant GHG emissions that would have a significant effect on the environment. As such, impacts would be less than significant.

b) Less than Significant Impact. The proposed project would not conflict with the City of Redlands' Climate Action Plan, the San Bernardino Greenhouse Gas Reduction Plan, the 2022 Scoping Plan, or the 2020-2045 RTP/SCS. The project's consistency with these plans is described in more detail below.

Climate Action Plan

As described above, the City adopted a CAP in December 2017. The consistency of the project with the goals of this CAP fulfills the CEQA goal of fully informing local-agency decision-makers of the environmental impact of the project under consideration at a stage early enough to ensure that GHG emissions are addressed. The proposed project would be consistent with the transportation goals of the CAP by providing additional parking options for electric vehicles and carpool/vanpool vehicles. The proposed project would also be consistent with the CAP goal of increasing energy efficiency in new buildings by complying with the latest California Building Code (Title 24), including the latest CALGreen Code standards. Construction of the project would include a diversion of construction waste from landfills to recycling consistent with current local and State standards and CAP goals to increase

diversion and reduction of waste. As such, the proposed project would be consistent with applicable CAP goals.

San Bernardino County Regional Greenhouse Gas Reduction Plan

As discussed above, the City of Redlands was a participant in the San Bernardino County Regional Greenhouse Gas Reduction Plan, which identifies the County's vision and goals on reducing GHG emissions in the different cities, local government facilities, and communities. Table 13 below presents the proposed project's compliance with each reduction measure evaluated for the City of Redlands, as identified in the San Bernardino County Regional Greenhouse Gas Reduction Plan.

Table 13
Project Consistency with City of Redlands GHG Reduction Measures

Measure	Description	Project Consistency
	Building Energy	
Policies	• **8-A.10:** Integrate trees and shade into the built environment to mitigate issues such as stormwater runoff and the urban heat island effect. • **8-P.1:** Promote energy efficiency and conservation technologies and practices that reduce the use and dependency on nonrenewable resources of energy by both City government and the community. • **8-P.2:** Promote energy awareness community-wide by educating the community regarding energy audits and incentive programs (tax credits, rebates, exchanges, etc.) available for energy conservation. • **8-P.3:** Proactively review and update City plans, resolutions, and ordinances to promote greater energy efficiency in both existing and new construction in regard to site planning, architecture, and landscape design. • **8-A.14**: Seek funding programs to assist low and moderate-income households in energy conservation. • **8-A.12:** Explore participating in new high-efficiency technology programs such as LED lighting for City facilities, safety lighting in parks and other public spaces, and LED street lighting conversion for all City-owned streetlights. • **8-P.10:** Demonstrate leadership by reducing the use of energy and fossil fuel consumption in municipal operations, including transportation, waste reduction, and recycling, and by promoting efficient building design and use. • **8-P.9**: Undertake initiatives to enhance sustainability by reducing the community's GHG emissions. • **8-A.20:** Support energy resiliency through a diversified system of energy sources including zero and near-zero emission technologies.	***Not Applicable.*** This measure is not applicable as the City would be responsible for implementing this measure. However, the proposed project would comply with the CALGreen Code, regarding building energy efficiency and other green building standards. In addition, the proposed project would include approximately 81,630 sq ft of ornamental landscaping that would cover 17 percent of the site.

	• **8-A.21**: Support the development of distributed energy resources (DER), such as combined heat and power (CHP) from microturbines, fuel cells, etc., to assist in local energy security.	
	On-Road	
Policies	• **8-P.10:** Demonstrate leadership by reducing the use of energy and fossil fuel consumption in municipal operations, including transportation, waste reduction, and recycling, and by promoting efficient building design and use. • **8-A.7:** Seek alternatives to reduce non-renewable energy consumption attributable to transportation within the Planning Area. Seek funding and other assistance from the South Coast Air Quality Management District (AQMD) for installation of electric vehicle charging stations at appropriate locations throughout the City. • **4-P.44**: Provide choices for travel options, including walking, biking, vehicular, and transit. • **4-P.52**: Encourage stops of larger trains (Metrolink) in stations that can adequately accommodate their size and have greater availability of and access to parking. • **4-P.41**: Foster a connected, accessible, and active community by creating attractively designed pedestrian- and transit-oriented villages with a mix of uses in a compact area. • **4-A.105:** Create an active and compact transit-oriented core with a mix of residential and commercial/office uses. Allow for the reuse of commercial sites as office centers. San Bernardino Council of Governments Reduction Profiles—Redlands San Bernardino County Regional Greenhouse Gas Reduction Plan 3-156 March 2021 ICF 4-A.101: Implement bicycle route improvements that provide intra-City and regional connections, connecting to Loma Linda, the City of San Bernardino, and north to the Santa Ana River Trail. **4-A.100**: Provide streetscape improvements along the major corridors of California Street and Redlands Boulevard to enhance comfort and safety for all modes of travel. • **4-A.116**: Implement bicycle route improvements that provide strong east-west connections to other Transit Villages as well as north-south connections to improve access to existing neighborhoods to the north. Routes would include the Orange Blossom Trail, the Lugonia Trail on New York Street, and a route along Texas Street.	***Not Applicable.*** The proposed project would include a speculative warehouse building. Future tenants of the building would implement mass transit encouragement measures as applicable.

	8-P.9: Undertake initiatives to enhance sustainability by reducing the community's GHG emissions.	
	Off-Road	
Policies	**8-P.9:** Undertake initiatives to enhance sustainability by reducing the community's GHG emissions.	***Consistent.*** The proposed project would comply with the CALGreen Code, regarding water conservation and green building standards. In addition, the proposed project would include electric vehicle spaces.
	Solid Waste Management	
Policies	• **8-P.10:** Demonstrate leadership by reducing the use of energy and fossil fuel consumption in municipal operations, including transportation, waste reduction, and recycling, and by promoting efficient building design and use. **8-A.42:** Adopt a construction and demolition waste recycling ordinance that requires, except in unusual circumstances, all construction, demolition and renovation projects that meet a certain size or dollar value to divert from landfills 100 percent of all cement concrete and asphalt concrete, and an average of at least 75 percent of all remaining non-hazardous debris	***Consistent.*** The proposed project would be consistent with County Solid Waste and State requirements for waste reduction.
	Wastewater Treatment	
Policies	• **8-A.29:** Reduce consumption of carbon-based fuels for conveyance and treatment of water and wastewater. **8-A.27**: Seek funding sources to implement renewable energy sources determined to be feasible for water and wastewater operations.	***Consistent.*** The proposed project would comply with the CALGreen Code, regarding water conservation and green building standards.
	Water Conveyance	
Policies	• **8-P.4**: Promote residential and commercial water conservation using multiple strategies. • **8-P.5:** Conserve the highest quality of water reasonably available for domestic use. • **8-P.6:** Minimize dependence on imported water through efficient use of local surface sources, using wise groundwater management practices, conservation measures, and the use of reclaimed wastewater and non- potable water for irrigation of landscaping and agriculture, where feasible. **8-P.8**: Promote sustainability by reducing the community's greenhouse gas (GHG) emissions and fostering green development patterns – including buildings, sites, and landscapes.	***Not Applicable.*** This measure is not applicable as the City would be responsible for implementing this measure. However, the proposed project would comply with the CALGreen Code, regarding water conservation and green building standards.

Source: Compiled by LSA (November 2022).
CALGreen Code = California Green Building Standards
Code GHG = greenhouse gas
sq ft = square feet

2022 Scoping Plan

The following discussion evaluates the proposed project according to the goals of the 2022 Scoping Plan, EO B-30-15, SB 32, and AB 197. EO B-30-15 added the immediate target of reducing GHG emissions to 40 percent below 1990 levels by 2030. CARB released a second update to the Scoping Plan, the 2017 Scoping Plan, to reflect the 2030 target set by EO B-30-15 and codified by SB 32. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in EO B-30-15. SB 32 builds on AB 32 and keeps the State on the path toward achieving its 2050 objective of reducing emissions to 80 percent below 1990 levels. The companion bill to SB 32, AB 197, provides additional direction to the CARB related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 intended to provide easier public access to air emissions data that are collected by CARB was posted in December 2016.

In addition, the 2022 Scoping Plan assesses progress toward the statutory 2030 target, while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

The 2022 Scoping Plan focuses on building clean energy production and distribution infrastructure for a carbon-neutral future, including transitioning existing energy production and transmission infrastructure to produce zero-carbon electricity and hydrogen, and utilizing biogas resulting from wildfire management or landfill and dairy operations, among other substitutes. The 2022 Scoping Plan states that in almost all sectors, electrification will play an important role. The 2022 Scoping Plan evaluates clean energy and technology options and the transition away from fossil fuels, including adding four times the solar and wind capacity by 2045 and about 1,700 times the amount of current hydrogen supply. As discussed in the 2022 Scoping Plan, EO N-79-20 requires that all new passenger vehicles sold in California will be zero-emission by 2035, and all other fleets will have transitioned to zero-emission as fully possible by 2045, which will reduce the percentage of fossil fuel combustion vehicles.

Energy efficient measures are intended to maximize energy efficiency building and appliance standards, pursue additional efficiency efforts including new technologies and new policy and implementation mechanisms, and pursue comparable investment in energy efficiency from all retail providers of electricity in California. In addition, these measures are designed to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. The proposed project would be required to comply with the latest Title 24 standards of the CCR, established by the CEC, regarding energy conservation and green building standards.

Water conservation and efficiency measures are intended to continue efficiency programs and use cleaner energy sources to move and treat water. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions. As noted above, the proposed project would be required to comply with the latest Title 24 standards of the CCR, which includes a variety of different measures, including reduction of wastewater and water use. Therefore, the proposed project would not conflict with any of the water conservation and efficiency measures.

The goal of transportation and motor vehicle measures is to develop regional GHG emissions reduction targets for passenger vehicles. The second phase of Pavley standards will reduce GHG emissions from new cars by 34 percent from 2016 levels by 2025, resulting in a 3 percent decrease in average vehicle

emissions for all vehicles by 2020. Vehicles traveling to the project site would comply with the Pavley II (LEV III) Advanced Clean Cars Program. Therefore, the proposed project would not conflict with the identified transportation and motor vehicle measures.

2020-2045 RTP/SCS

SCAG's RTP/SCS identifies that land use strategies that focus on new housing and job growth in areas served by high quality transit and other opportunity areas would be consistent with a land use development pattern that supports and complements the proposed transportation network. The core vision in the 2020–2045 RTP/SCS is to better manage the existing transportation system through design management strategies, integrate land use decisions and technological advancements, create complete streets that are safe to all roadway users, preserve the transportation system, and expand transit and foster development in transit oriented communities. The 2020–2045 RTP/SCS contains transportation projects to help more efficiently distribute population, housing, and employment growth, as well as forecast development that is generally consistent with regional-level general plan data. The forecasted development pattern, when integrated with the financially constrained transportation investments identified in the 2020–2045 RTP/SCS, would reach the regional target of reducing GHG emissions from autos and light-duty trucks by 19 percent by 2035 (compared to 2005 levels). The 2020–2045 RTP/SCS does not require that local general plans, specific plans, or zoning be consistent with the 2020–2045 RTP/SCS, but provides incentives for consistency for governments and developers.

Implementing SCAG's RTP/SCS will greatly reduce the regional GHG emissions from transportation, helping to achieve statewide emissions reduction targets. As stated above, the proposed project would result in a minimal increase in daily trips compared to existing conditions and would in no way conflict with the stated goals of the RTP/SCS; therefore, the proposed project would not interfere with SCAG's ability to achieve the region's GHG reduction target of 19 percent below 2005 per capita emissions levels by 2035. Furthermore, the proposed project is not regionally significant per State CEQA Guidelines Section 15206 and as such, it would not conflict with the SCAG RTP/SCS targets since those targets were established and are applicable on a regional level.

Based on the nature of the proposed project, it is anticipated that implementation of the proposed project would not interfere with SCAG's ability to implement the regional strategies outlined in the RTP/SCS.

4.8 – Hazards and Hazardous Materials

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 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 *Phase I Environmental Site Assessment (ESA)*, dated March 31st, 2022, was prepared for the project by Roux Associates, Inc. (see Appendix C). The ESA was performed on both parcels associated with the project; APNs 0292-192-11-0000 at 301 Tennessee Street and 0292-192-14-0000 at 360 Kansas Street. Those parcels will be referred to as Parcel 1 and 2 respectively. The information in this section relates to hazards and hazardous wastes and is based on the information and analysis provided in the Phase I ESA.

a) Less than Significant Impact with Mitigation Incorporated. Implementation of the project could create significant hazards as a result of the routine transport, use, or disposal of hazardous materials during the construction of the proposed project and subsequent operation of the project. The results of the Phase I Environmental Site Assessment found evidence of three Recognized Environmental Conditions (RECs) representing the presence or likely presence of hazardous substance at the property. The identified RECs include: (1) releases at a former fire suppression water trap; (2) leaks from a former 300-gallon gasoline underground storage tank (UST); and (3) a leaking former solvent degreaser.

(1) Fire Suppression Trap. The first REC is a former fire suppression fire trap located on Parcel 1 and involves the release (leak) of volatile organic compounds (VOCs) primarily consisting of trichloroethene (TCE) and tetrachloroethene (PCE) into the soil. A soil investigation conducted in 1994 identified soil impacted by VOCs and total petroleum hydrocarbons (TPH) in the vicinity of a former "fire suppression water overflow collection trap (seepage pit)". Later soil investigations on Parcel 1 further suggested the origin of contamination was the seepage pit. Impacted soil vapor throughout Parcel 1 is limited to the upper 15 feet, except for the suspected seepage pit, where prior investigations have reported TCE in the soil vapor up to 95 feet below ground surface (bgs). Groundwater samples collected at a permanent monitoring well at the seepage pit (MW-1) have indicated TCE concentrations slightly exceeding drinking standards. Furthermore, indoor air investigations conducted within the former La-Z-Boy building on Parcel 1, identified indoor air impacted by VOCs. The impacts to indoor air are potentially the result of vapor intrusion but are considered more likely to be caused by foam roofing material known to contain (and potentially off-gas) PCE.

(2) Underground Storage Tank. According to records made available by the County of San Bernardino Fire Protection District: Hazardous Materials Division (CSBFD-HMD), the second REC is a 300-gallon gasoline UST formerly located on Parcel 2, approximately 50 feet north of the current residential building. The former UST was removed June 26, 1995, under the supervision of the CSBFD-HMD. A closure letter was issued July 3, 1995, however, in the opinion of the ESA, the closure investigation conducted at the time does not meet current regulatory requirements. Confirmation samples taken at the time did not report VOCs and TPH-gasoline above reporting limits.

(3) Former Solvent Degreaser. Records provided by the South Coast Air Quality Management District (SCAQMD) indicate a former solvent degreaser was installed on site in 1984. No site plans or any records or actions to abandon the degreaser were reviewed by Roux in preparation for the ESA and is considered a data gap. However, given the use of chlorinated solvents used, it is considered an REC as well.

No Controlled Recognized Environmental Conditions (cRECs) or Historical RECs (hRECs) were identified in the Phase I ESA.

Other Environmental Features. The Phase I ESA did acknowledge the existence of Other Environmental Features (OEFs) as "environmental conditions that do not meet the definition of a REC,

but which may warrant mention in a comprehensive Phase I ESA." OEFs identified in the assessment include former agricultural operations and pesticide usage, a former on-site railroad spur, hazardous chemical storage (degreaser, wax, diesel, and hydraulic fluid), and an unused groundwater well to the east of the residential building on Parcel 2.

A Limited Phase II Site Investigation was prepared by GSI Environmental Inc. for Acc Bld, LLC: Redlands, dated April 1, 2022, and was reviewed by Roux in preparation for this assessment. GSI installed two temporary groundwater monitoring wells at the southern boundary of Parcel 1 for soil vapor monitoring. A total of 46 samples, 23 from each well, were analyzed for VOCs. No VOCs were reported above laboratory reporting limits in the second well (GSI-B2). VOCs detected in the first well (GSI-B1) (chloroform, 1,1-DCE, and TCE) were detected, but were below applicable limits. VOCs were not detected in the grab groundwater samples collected from GSI-B1 and GSI-B2 temporary monitoring wells. TCE, 1,1-DCA and 1,1-DCE were detected above applicable Screening levels in the previously existing MW-1; and GSI concluded that there is a VOC contamination at the northern portion of the project site, near MW-1, and that such VOC concentrations have slightly impacted the groundwater. GSI recommended the implementation of a soil vapor extraction (SVE) to remediate soil at the project site, and recommends groundwater monitoring only, not remediation.

Short-term Activities (Construction): Project construction activities would involve the temporary use and transport of fuels, equipment, earth and building materials, among other potentially hazardous materials. The contractor would be required to develop and adhere to a Health and Safety Plan, which pursuant to California state Health and Safety Code Chapter 6.95, Division 20 (§§ 25500-25532), would minimize potentially hazardous effects of handling potentially hazardous materials during construction.[18] Construction operations would require the removal, clean up, and proper disposal of RECs and OEFs identified at the project site. The project will be in the jurisdiction of, and in compliance with, the Environmental Protection Agency (EPA) and County of San Bernardino, which manage the inspection, regulation, transportation, use, and disposal of hazardous materials in Redlands

Past and ongoing soil and groundwater testing has identified areas of contaminated soil on the project site. Onsite soils must meet state health standards for industrial uses to minimize potential public or worker health conditions during and after grading. Implementation of **Mitigation Measure HAZ-1**, which requires soil testing and removal of contaminated soils (if found), would help assure onsite soils meet applicable health and safety standards during project grading and prior to any new occupancy of the project site.

Construction activities may also involve the placement of remediation equipment or improvements within the proposed project – these improvements are incorporated into **Mitigation Measures HAZ-2 through HAZ-4**. **Mitigation Measure HAZ-2** requires implementation of on-site soil vapor extraction (SVE) system remediation activities, Mitigation Measure HAZ-3 requires installation of a vapor intrusion mitigation system (VIMS) beneath the proposed warehouse, and HAZ_4 requires preparation of a soil management plan (SMP). With implementation of these measures, potential impacts to the surrounding area from the disposal or transport of onsite hazardous materials or waste will be reduced to less than significant levels.

Long-term Activities (Operation)
With regard to project operation, the site is zoned as Light Industrial, which allows light manufacturing, warehousing, storage, and office uses. The proposed project is a warehouse, meant for the storage and movement of materials. The specific materials moved through the proposed industrial facility site are unknown prior to its construction, however 10% of storage space is being designated for cold storage usage. In compliance with the San Bernardino County Hazardous Waste Management Plan (HWMP), the City of Redlands requires businesses that use or generate hazardous materials to keep

an inventory of the amounts and types on-site. The transport, use, and/or disposal of hazardous materials is not associated with or expected with this project. The project will generate limited amounts of Household Hazard Waste (HHW), wastes prohibited or discouraged from being disposed of at local landfills. The San Bernardino County Fire Protection District operates a Household Hazardous Waste Program, with 14 permanent HHW collection facilities. These facilities will allow easy disposal of any HHW generated on-site. Through adherence to local regulations, the use of common household hazardous materials, created waste, and their disposal do not present a substantial health risk to the community. Impacts associated with the routine transport, use, or disposal of hazardous materials or wastes would be less than significant.

Remediation and Monitoring

Based on past onsite hazmat contamination conditions, safe operation of the new warehouse will depend on the success of ongoing and planned remediation activities (if needed) during project construction, and monitoring activities (if needed) post construction. **Mitigation Measures HAZ-2 through HAZ-4** address the potential remediation and monitoring activities on the site that may be needed to reduce impacts related to past contamination of the site by hazardous materials.

Based on this analysis, the project will not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. With implementation of the recommended mitigation measures and related regulatory compliance, potential impacts will be reduced to less than significant levels.

b) Less than Significant Impact with Mitigation Incorporated. According to the State Water Resources Control Board there are no open cases of leaking underground storage tanks (LUST) on site (see section 4.8d below). A 300-gallon gasoline UST located on Parcel 2 was removed June 26, 1995, under the supervision of the CSBFD-HMD. A Phase I ESA was conducted on Parcel 2 by Northgate Environmental Management, Inc. (Northgate) on June 10, 2020. Roux reviewed this report, which did not identify any hRECs on the property, and identified one REC related to the former UST previously discussed. The ESA did not suggest any additional recommendations. Per the Phase II Site Investigation prepared by GSI Environmental Inc., it was concluded that there is a VOC contamination at the northern portion of the project site (Parcel 1), and that the VOC concentrations have slightly impacted the groundwater. Recommendations include the implementation of soil vapor extraction (SVE) to remediate soil at the project site, and groundwater monitoring. Although the various hazmat studies indicate the VOC concentrations may not present a significant hazard to the public or environment, potential impacts from the subsurface release of hazardous materials into the environment would be reduced to less than significant levels by implementation of **Mitigation Measures HAZ-1 through HAZ-**4 as discussed in Threshold 4.8.a above.

Other environmental features of possible concern identified in the ESA may create a potential hazard to the public or environment. The project site was once used for agricultural purposes from the early 1900s to the mid-1960s; and as such pesticide usage most likely occurred. Furthermore, a rail line from the Southern Pacific Railroad previously ran along what is currently State Street. A railroad spur was identified to be present at the project site from at least 1967 to the late 1980s. A shallow soil investigation conducted in 2019 and tested for organochlorine pesticides (OCPs), heavy metals, TPH, and semi-volatiles organic compounds (SVOCs). According to the investigations, no compounds were detected above applicable screening levels or typical background concentrations. Additionally, hazardous chemicals were stored on site at the former La-Z-Boy facilities. No significant staining was observed during the ESA that could be attributed to hazardous material storage. Stained or shallow contaminated soils should be disposed of if encountered with regard to local requirements.

Based on this analysis, impacts to the public through the accidental release of hazardous materials would be reduced to less than significant levels by implementation of **Mitigation Measures HAZ-1 through HAZ-4** as discussed in Threshold 4.8.a above.

c) Less than Significant Impact with Mitigation Incorporated. The Redlands Adventist Academy (grades K-12) is located at 130 Tennessee Street, approximately 0.1-mile southeast of the project site, while the Arrowhead Christian Academy Upper School (grades 9-12) is located at 105 Tennessee Street approximately 0.1-mile south of the project site. As discussed in Thresholds 9.a and 9.b above, the project has some potential to result in the release of hazardous materials during remediation, grading, or construction related to remediation of the existing contamination. However, implementation of **Mitigation Measures HAZ-1 through HAZ-4** would help ameliorate any significant impacts to local schools during project construction or operation. Therefore, the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. With the recommended mitigation any impacts would be reduced to less than significant levels.

d) No Impact. The proposed project is not located on a site listed on the state *Cortese List*, a compilation of various sites throughout the state that have been compromised due to soil or groundwater contamination from past uses.[19] Based upon review of the *Cortese List*, the project site is not:

- listed as a hazardous waste and substance site by the Department of Toxic Substances Control (DTSC),[20]
- listed as a leaking underground storage tank (LUST) site by the State Water Resources Control Board (SWRCB),[21]
- listed as a hazardous solid waste disposal site by the SWRCB,[22]
- currently subject to a Cease and Desist Order (CDO) or a Cleanup and Abatement Order (CAO) as issued by the SWRCB,[23] or
- developed with a hazardous waste facility subject to corrective action by the DTSC.[24]

Based on the above review of the Cortese List, the proposed project would not create a significant hazard to the public or the environment. No impact would occur.

e) Less than Significant Impact. The project site is located approximately 4 miles south of the San Bernardino International Airport (SBIA), and 5 miles west of the Redlands Municipal Airport. The project site is outside of the SBIA and Redlands Airport noise contour maps (See Noise Appendix D). The proposed project would adhere to noise and safety policies in Redlands' General Plan.[25] The project site is not located within two miles of a local airport and would not create excessive noise to local residents. Impacts would be less than significant.

f) Less than Significant Impact. Construction of the proposed project would not interfere with access for emergency personnel or the evacuation of onsite staff. Access to the project site would be available through four driveways; one on State Street, two on Tennessee Street, and one on Kansas Street. A 30-foot fire lane would connect all four driveways and wraps around the perimeter of the proposed warehouse except for the southern facing side of the building. Construction operations conducted at the project site would not significantly impede the flow of traffic on major evacuation routes in and around the City of Redlands, which include Interstates 10, 15, 210, and 215, and State Highways 30, 60, 66, 71, and 83. The project would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan because no permanent public street or lane closures are proposed. Construction work in the street associated with the project would be limited to a nominal potential traffic diversion. Project impacts would be less than significant.

g) Less than Significant Impact. The project site is not located within or near any State Responsibility Areas or other wildland areas; the nearest such area being in adjacent Loma Linda as part of the San Timoteo Canyon.[26] Any potential impacts related to wildland fire would be less than significant.

Mitigation Measures

HAZ-1 **Soil Testing.** Prior to issuance of a grading permit, representative soil sampling shall be conducted onsite at depths of one and three feet and tested for organochlorine pesticides (OCPs) and heavy metals which may be present from past agricultural activities. The developer shall retain a qualified environmental professional (QEP) to design and supervise the sampling and testing. A final report shall be prepared summarizing the results of this testing and where onsite soils meet current industrial standards for sampled materials.

If the QEP determines that all onsite soil meets industrial standards, no further action is required. If onsite soils do not meet industrial standards, the QEP will work with the developer and grading contractor to determine how onsite soils can be mixed with clean offsite or imported soils to achieve the industrial standard for the entire site. The QEP, developer, and grading contractor shall also identify if or how much soil needs to be removed from the site. The collection and disposal of any excavated contaminated soils shall be in accordance with applicable hazardous materials regulations.

HAZ-2 **Soil Vapor Extraction (SVE) System.** Onsite SVE remediation activities began in September 2022 and were ongoing during preparation of the CEQA document. Two deep extraction wells (SVE-1 and SVE-2) are located on the northern and western portions of the site outside of the existing warehouse building. However, these wells would be impacted by development of the new warehouse project. Based on ongoing soil vapor monitoring, the existing SVE remediation activities will be completed by June 2023. SVE remediation activities shall be completed, and a final report submitted to the City prior to issuance of a grading permit for the proposed project. Regulatory oversight and approval of this system will be at the discretion of the San Bernardino County Fire Department as the County's Certified Unified Program Agency (CUPA). If the CUPA declines to be the regulatory authority for this oversight, the applicant shall enter into a Voluntary Cleanup Program (VCP) with the California Department of Toxic Substances Control (DTSC). The applicant must document the site meets all applicable health standards for groundwater and soil per the appropriate regulatory authority discussed above before a grading permit can be issued. Additional details on the SVE system can be found in Roux's SVE Pilot Test Technical Memorandum dated January 4, 2023 and the DRAFT Construction Completion Report dated March 3, 2023.

Once it is documented that applicable health standards have been met by the existing SVE activities, they can be shut down and all wells and subsurface piping shall be removed from the site. Confirmatory soil vapor samples will then be used to conduct a post-remediation human health risk assessment (HHRA). If the post-remediation HHRA shows risk less than 1:1,000,000 ("one in a million new cancer deaths"), no additional work associated with residual VOC concentrations is required (i.e., Mitigation Measure HAZ-3 is not required). If the post-remediation HHRA shows a risk greater than 1:1,000,000 then the developer shall implement Mitigation Measure HAZ-3.

HAZ-3 **Vapor Intrusion Mitigation System (VIMS).** If the post-remediation HHRA outlined in HAZ-2 shows risk greater than 1:1,000,000, a passive sub-slab Vapor Intrusion

Mitigation System (VIMS) shall be installed beneath the future warehouse building. The VIMS will generally consist of the following components (from bottom to top): (1) Gravel bed above the certified pad; (2) Horizontal perforated piping within the gravel bed to capture and convey residual vapors; (3) Spray-applied barrier above the gravel bed and below the building slab; and (4) Vertical risers to vent vapors to the atmosphere above the roof line.

If the VIMS is determined to be necessary, it shall be designed by a qualified professional engineer (P.E.) licensed in California. The VIMS design will be finalized prior to the start of building construction.

The VIMS system shall be designed to allow regular monitoring of vapor concentrations. After occupancy, monitoring shall be conducted and documented quarterly for the first year, semi-annually the second year, and annually thereafter for five years.

The installation and monitoring of the VIMS system shall be under the oversight of the City Engineering Department in consultation with the County Fire Department, Hazardous Materials Division as the Certified Unified program Agency (CUPA) for the County.

HAZ-4 **Soil Management Plan (SMP).** After remediation is complete and prior to grading and earth movement, a Soil Management Plan (SMP) shall be prepared to provide protocols and procedures if unexpected or unknown subsurface conditions are encountered at the project site. The SMP shall be shared with all contractors involved with earth movement and import activities, if any. The SMP shall identify parties to be contacted if unexpected or unknown conditions are encountered, including an environmental professional and regulatory agencies, if necessary (e.g., if an underground storage tank is encountered).

4.9 – Hydrology and Water Quality

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	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 sustainable 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 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?	☐	☐	☑	☐

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☑	☐

a) Less than Significant Impact. The project site is zoned as Light Industrial, meant for manufacturing, distribution, research and development (R&D) industries, and ancillary commercial uses. The project site is currently developed with an existing former manufacturing warehouse and unoccupied single-family home. The proposed project includes the demolition of existing onsite structures and the construction of a warehouse and associated parking and landscape improvements. By their nature, these kinds of facilities require a significant amount of parking, truck-staging, and vehicle circulation, in addition to the building facilities themselves. This in turn increases the amount of impermeable surfaces and the amount of flows into storm drains. Landscape coverage around the project site serves to provide relief for this. Construction and operation of the proposed warehouse would be required to comply with federal, state, and local water guidelines and requirements.

According to the City's General Plan, Redlands belongs to the Upper Santa Ana River Watershed Integrated Regional Water Management Plan (IRWM), a plan with the objective of improving water supply reliability, flood management, stormwater recharge, water quality, and habitats/open space. Development of the proposed warehouse would have to adhere to benchmarks outlined in the San Bernardino Valley Regional Urban Water Management Plan (RUWMP). Additionally, landscaping associated with the development of the proposed project would be in compliance with Chapter 15-54 of the Redlands Municipal Code, Water Efficient Landscape Requirements. Compliance with such requirements include following irrigation schedules, water efficiency audits, and non-potable irrigation systems among other guidelines. Furthermore, the project would be required to adhere to all Santa Ana Regional Water Quality Control Board (SARWQCB) permitting requirements for construction and NPDES standards for stormwater runoff, as well as adhere to City ordinances requiring the use of Best Management Practices (BMPs) to control the release of potential pollutants entering storm drain systems.[27] Such BMPs include, but are not limited to, routine street sweeping, routine storm drain and catch basin cleaning, regular pavement repair/maintenance, spill prevention practices, etc. With adherence to SARWQCB permitting requirements and NPDES standards, and adherence to City guidelines, impacts to water quality standards or waste discharge requirements will be less than significant.

b) Less than Significant Impact. Construction of the proposed warehouse and associated parking has the potential to interfere with groundwater recharge and can potentially deplete supplies. The nearest monitoring well to the project site is located approximately 0.4 miles southeast of the project site. The well has a depth of 548 feet, and the most recent readings, taken December 1, 2022, indicate a depth to groundwater of 180.1 feet.[28] The low water table recorded indicates the project will have a less than significant impact on groundwater supplies. The proposed project includes the demolition of the current 193,469 square-foot manufacturing building, and the development of a 193,469 square-foot warehouse building, 267 parking spaces, and the paving of driveways for truck and car access. The paving of previously undeveloped land and the increase in building surface area would increase impervious surface coverage on the site, thereby potentially reducing the total amount of infiltration

onsite. However, development of the proposed warehouse will include approximately 84,845 square feet of ornamental landscaping that would cover 18% of the site. Additionally, drainage from the proposed project would surface flow through the site and use catch basins and landscape drains to collect for treatment. The subsurface storm drain would be used to convey flows into a proposed underground chamber infiltration system. The project site is not utilized for groundwater recharge and would include landscaping and drainage improvements that will contribute to infiltration. The development of the project site would have a less than significant impact on the groundwater table level.

c.i) Less than Significant Impact. The City of Redlands is located in and around several regional watersheds. The City's existing water system is reliant on the Mill Creek and Santa Ana Watersheds. No rivers or streams intersect the project site. The project would not result in the alteration of drainages and drainage patterns, as the project would install new onsite water and sewer lines that would connect to the existing infrastructure in the surrounding streets. Drainage facilities on-site would be regularly maintained. Development of the proposed project would include construction activities such as demolition, site preparation, and grading. According to the City, all grading plans within the city require a standalone Erosion Control Plan.[29] Adherence to the City's erosion plan guidelines during construction of the proposed warehouse and proper maintenance of drainage facilities would decrease the likelihood of erosion of sensitive stream habitats, and as such any impacts to streams or rivers near the project site will be less than significant.

c.ii) Less than Significant Impact. No rivers or streams traverse the project site; thus, the project would not result in the alteration of any stream course. During construction, the project applicant would be required to comply with drainage and runoff guidelines pursuant to Redlands Municipal Code Chapter 15.54.200.[30] Due to the developed condition of the project site, the proposed project would not alter the existing drainage pattern of the site or surrounding area or increase runoff. With regard to project operation, construction of the project would increase the net area of impermeable surfaces on the site; therefore, increased discharges to the City's existing storm drain system may occur. Surface runoff associated with the proposed development would be collected on site through multiple drainage areas and infiltration systems and conveyed to the City's storm drainage system. All drainage plans are subject to City review and approval. The project site is zoned for light industrial uses and as a result could increase pollutants entering drainage systems. Construction of the proposed project will be required to adhere to all SARWQCB permitting requirements and NPDES standards for stormwater runoff, as well as adhere to City ordinances requiring the use of BMPs to control the release of potential pollutants entering storm drain systems as indicated in the City's General Plan. Compliance with local drainage guidelines and implementation of pollutant-related BMPs would make potential impacts less than significant.

c.iii) Less than Significant Impact. Development of the proposed project would increase the net area of impermeable surfaces on the site. Construction of the proposed project would install new onsite water and sewer lines connecting to the existing infrastructure in the surrounding streets. Drainage from the proposed project would surface flow through the site and utilize catch basins and landscape drains to collect for treatment. Subsurface storm drains would convey flows into a proposed underground chamber infiltration system. All drainage plans are subject to City review and approval. The proposed project is zoned for light industrial use and could result in substantial pollutant loading. As discussed in sections 4.9a and 4.9c.ii, BMPs would be required to be incorporated to protect water quality. With proper maintenance of drainage facilities and adherence to BMPs, impacts would be less than significant.

c.iv) Less than Significant Impact. According to flood maps prepared by the Federal Emergency Management Agency (FEMA), the project site is located in an area designated as "Flood Zone AO"; a special flood hazard area subject to inundation by the 1% annual chance flood with average flood depths

between 1 to 3 feet.[31] This designation is considered for river or stream flood hazard areas; the project site is adjacent to the Mission Channel, an irrigation canal that originally provided water to farms, and now serves to carry stormwater and runoff out of the city. The project site is currently occupied by a former La-Z-Boy manufacturing warehouse and unoccupied single-family home. The demolition of existing structures, grading, and construction of the proposed warehouse, parking, and landscaping would not impede or redirect flood flows, nor will it impact the flow of the Mission Channel. The project site is in a special flood hazard area; however, construction and operation of the project would not impede or redirect flood flows from the current condition because construction of the proposed warehouse would take place entirely within the existing footprint of the site and would not encroach on the flood control channel to the north. In addition, the proposed project would comply with City of Redlands Municipal Code Chapter 15.32 (Flood Damage Protection), which would ensure flood flows would not be impeded. Impacts will be less than significant.

d) Less than Significant Impact. The City is not exposed to tsunami hazards due to its inland location. In addition, according to the California Department of Water Resources, the City of Redlands is not located in a dam inundation area.[32] There are no impacts related to tsunami or dam inundation. The project site is located in a special flood hazard area, as indicated previously by FEMA, subject to inundation by the 1% annual chance flood. However, adherence to City ordinances requiring the use of BMPs to control the release of potential pollutants would reduce the potential for the release of pollutants in the event of inundation by a flood. Impacts would be less than significant.

e) Less than Significant Impact. The Santa Ana Regional Water Quality Control Board's (SARWQCB) Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Development of the proposed project will be required to adhere to requirements of the Basin Plan. This includes the incorporation of BMPs to protect water quality during construction and operational periods. Development of the project site would be subject to all existing water quality regulations and programs, including all applicable construction permits. Existing General Plan policies related to groundwater quality are applicable to the project. The Sustainable Community Element includes policies that aim to limit potential water quality impacts and to promote groundwater conservation. Implementation of General Plan policies and the Regional Basin Plan would ensure that water quality impacts related to the proposed project would be less than significant.

4.10 – Land Use and Planning

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☑
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 irregularly shaped project site is comprised of 2 parcels with an existing manufacturing warehouse and a single-family house. The project site is surrounded by commercial, industrial, and transportation-related land uses, and will not include the reconfiguration of existing roadways or streets. There are residential uses near the project site, however the project will not divide an established community and, as such, no impacts will occur.

b) No Impact. The project would not conflict with light industrial land uses (manufacturing, distribution, commercial) designated in the Redlands General Plan.[33] The proposed project is located within the Zoning designation of Light Industrial (I-P) which permits warehouses. The site is not located in a specific plan area. The proposed project does not require a general plan amendment or change of zone and will be required to comply with all applicable policies, requirements, and regulations of any agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. No impact will occur.

4.11 – Mineral Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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) Less Than Significant Impact. The California Surface Mining and Reclamation Act identifies and protects mineral resources within the State of California. It establishes several Mineral Resource Zones, divisions of land containing within them various amounts of known or unknown mineral resources. According to the City's General Plan, the northeast portion of the project site is adjacent to an MRZ-2 area, the designation suggesting that significant mineral resources may be present.[34] The General Plan further indicates that the project site is not located in an area designated by the State Mining and Geology Board as having regionally significant PCC-grade aggregate resources. The project site is located in an urbanized area of Redlands, with developments currently on and surrounding the property that include business, industrial, and residential uses. The demolition and redevelopment of the project site would not constitute a loss of aggregate mineral resources to the City or the State as its urban location is incompatible with mining operations and would negatively impact surrounding businesses and residents. Furthermore, the majority of the project site is located in an area with undetermined mineral resource occurrences. The proposed project is in a developed area of the City, incompatible with mining extraction operations, and would have a less than significant impact on mineral resources available to the City.

b) Less than Significant Impact. Mineral resources found in Redlands have been deemed significant to the region and the State, however such mineral resources identified have not been designated as locally significant to the City of Redlands. The northeast portion of the project site is adjacent to an MRZ-2 area, of which significant mineral deposits are likely to be present. However, the area is zoned as Light Industrial (I-P), meant for light industrial uses related to warehousing, wholesaling, and manufacturing uses. The area is urbanized and is surrounded by areas that would not support the development of mining operations and the subsequent increase in mining related pollution. The development of the project does not constitute a loss of mineral resources as the surrounding land uses do not support the development of mining operations. Potential impacts to locally important mineral resources would be less than significant.

4.12 – Noise

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 the vicinity of a private airstrip or 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 *Noise and Vibration Impact Analysis* was prepared by LSA (January, 2023) to evaluate and document noise levels associated with construction and operation of the proposed warehouse (See Appendix D). The information in this section is taken from the *Noise and Vibration Impact Analysis* for the proposed project. Additional detail regarding how noise is defined and measured can be found in the report in Appendix D.

a) Less than Significant Impact. Physical damage to human hearing begins at prolonged exposure to sound levels higher than 85 dBA. Exposure to high sound levels affects the entire system, with prolonged sound exposure in excess of 75 dBA increasing body tensions, thereby affecting blood pressure and functions of the heart and the nervous system. In comparison, extended periods of sound exposure above 90 dBA would result in permanent cell damage. When the sound level reaches 120 dBA, a tickling sensation occurs in the human ear, even with short-term exposure. This level of sound is called the threshold of feeling. As the sound reaches 140 dBA, the tickling sensation is replaced by a feeling of pain in the ear (i.e., the threshold of pain). A sound level of 160–165 dBA will result in dizziness or a loss of equilibrium. The ambient or background noise problem is widespread and generally more concentrated in urban areas than in outlying, less developed areas.

Construction Noise Impact Analysis

Two types of short-term noise impacts could occur during the construction of the proposed project. First, construction crew commutes and the transport of construction equipment and materials to the site for

the proposed project would incrementally increase noise levels on access roads leading to the site. Although there would be a relatively high single-event noise-exposure potential causing intermittent noise nuisance (passing trucks at 50 ft would generate up to 84 dBA L_{max}), the effect on longer-term ambient noise levels would be small when compared to existing daily traffic volumes on Kansas Street, West State Street, and Tennessee Street. Because construction-related vehicle trips would not approach existing daily traffic volumes, as less trips would be made over a shorter-period of time, traffic noise would not increase by 3 dBA CNEL. A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, short-term, construction-related impacts associated with worker commute and equipment transport to the project site would be less than significant. The second type of short-term noise impact is noise generated during construction at the project site which includes demolition of the existing structures and other site improvements, site preparation, grading, building construction, paving, and architectural coating on the project site. Construction is completed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the site and, therefore, the noise levels surrounding the site as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. Table 14 lists typical construction equipment noise levels recommended for noise impact assessments, based on a distance of 50 feet between the equipment and a noise receptor, taken from the FHWA Roadway Construction Noise Model. In addition to the reference maximum noise level, the usage factor provided in Table 14 is used to calculate the hourly noise level impact for each piece of equipment

Table 14
Typical Construction Equipment Noise Levels

Equipment Description	Acoustical Usage Factor (%)[1]	Maximum Noise Level (L_{max}) at 50 Feet[2]
Auger Drill Rig	20	84
Backhoes	40	80
Compactor (ground)	20	80
Compressor	40	80
Cranes	16	85
Dozers	40	85
Dump Trucks	40	84
Excavators	40	85
Flat Bed Trucks	40	84
Forklift	20	85
Front-end Loaders	40	80
Graders	40	85
Impact Pile Drivers	20	95
Jackhammers	20	85
Paver	50	77
Pickup Truck	40	55
Pneumatic Tools	50	85
Pumps	50	77
Rock Drills	20	85
Rollers	20	85
Scrapers	40	85
Tractors	40	84
Trencher	50	80
Welder	40	73

Source: FHWA Roadway Construction Noise Model User's Guide, Table 1 (FHWA 2006).
Note: Noise levels reported in this table are rounded to the nearest whole number.
[1] Usage factor is the percentage of time during a construction noise operation that a piece of construction equipment is operating at full power.
[2] Maximum noise levels were developed based on Specification 721.560 from the Central Artery/Tunnel program to be consistent with the City of Boston's Noise Code for the "Big Dig" project.
FHWA = Federal Highway Administration
Lmax = maximum instantaneous sound level

The project construction composite noise levels at a distance of 50 feet would range from 74 dBA Leq to 88 dBA Leq with the highest noise levels occurring during the site preparation and grading phases. Table 15 shows the nearest sensitive uses to the project site, their distance from the center of construction activities, and composite noise levels expected during construction. These noise level projections do not consider intervening topography or barriers. Construction equipment calculations are provided in Appendix D.

Table 15
Potential Construction Noise Impacts at Nearest Receptor

Receptor (Location)	Composite Noise Level (dBA L_{eq}) at 50 Feet [1]	Distance (feet)	Composite Noise Level (dBA L_{eq})
Industrial Uses (West)	88	315	72
Industrial Uses (South)		485	68
Commercial Uses (North)		485	68
School (South)		715	63

Source: Compiled by LSA (2023).
[1] The composite construction noise level represents the site preparation and paving phases which are expected to result in the greatest noise level as compared to other phases.
dBA Leq = average A-weighted hourly noise level

While construction noise would vary, it is expected that composite noise levels during construction at the nearest off-site industrial uses to the east would reach 72 dBA Leq while construction noise levels would approach 63 dBA Leq at the nearest sensitive use (School) to the south during daytime hours. These predicted noise levels would only occur when all construction equipment is operating simultaneously; and therefore, are assumed to be conservative. While construction-related short-term noise levels have the potential to be higher than existing ambient noise levels in the project area under existing conditions, the noise impacts would no longer occur once project construction is completed.

Noise impacts associated with construction activities are regulated by the City's noise ordinance. The proposed project would comply with the construction hours specified in the City's Noise Ordinance, which states that construction activities are allowed between the hours of 7:00 a.m. and 6:00 p.m. on weekdays, including Saturdays, with no activities taking place at any time on Sundays or federal holidays.

As it relates to off-site uses, construction-related noise impacts would remain below the 80 dBA Leq and 90 dBA Leq construction noise level criteria, as established by the FTA for residential and industrial land uses, respectively, for the average daily condition as modeled from the center of the project site and therefore would be considered less than significant. Best construction practices shall be implemented to minimize noise impacts to surrounding receptors. Adhering to the practices outlined

below, would ensure impacts to the surrounding area from construction-related activities would be less than significant.

Construction Noise Control Best Management Practices.
In addition to compliance with the City's Municipal Code, which states that construction activities are allowed between the hours of 7:00 a.m. and 6:00 p.m. on weekdays, including Saturdays, with no activities taking place at any time on Sundays or federal holidays, the following best construction practices would further minimize construction noise impacts:

- The project construction contractor shall equip all construction equipment, fixed or mobile, with properly operating and maintained noise mufflers consistent with manufacturer's standards.
- The project construction contractor shall locate staging areas away from off-site sensitive uses during the later phases of project development.
- The project construction contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the project site whenever feasible.

Operational Noise Impact Analysis

Long-Term Off-Site Traffic Noise Impacts
As a result of the implementation of the proposed project, off-site traffic volumes on surrounding roadways have the potential to increase. The proposed project trips generated were obtained from the *Focused Traffic Analysis for the 301 Tennessee Street Industrial Building.* The proposed project would generate a net increase of 71 passenger car equivalent (PCE) trips. Based on data from the City of Redlands Maps and Geographic Data, the existing average daily traffic (ADT) on Tennessee Street is 12,000.

An increase of approximately 0.02 dBA CNEL is expected along the streets adjacent to the project site. A noise level increase of less than 1 dBA would not be perceptible to the human ear; therefore, the traffic noise increase in the vicinity of the project site resulting from the proposed project would be less than significant.

Long-Term Off-Site Stationary Noise Impacts
Adjacent off-site land uses would be potentially exposed to stationary-source noise impacts from the proposed on-site mechanical equipment, trash bin activities, and truck deliveries and loading and unloading activities. The potential noise impacts to off-site sensitive land uses from the proposed HVAC equipment, cold storage fan units, trash bin emptying, and truck delivery activities are discussed below. To provide a conservative analysis, it is assumed that operations would occur equally during all hours of the day and that half the 25 loading docks would be active at all times. Additionally, it is assumed that within any given hour, three heavy trucks would maneuver to park near or back into one of the proposed loading docks. To determine the future noise impacts from project operations to the noise sensitive uses, a 3-D noise model, SoundPLAN, was used to incorporate the site topography as well as the shielding from the proposed building on-site.

Heating, Ventilation, and Air Conditioning Equipment
The project would have various rooftop mechanical equipment including HVAC units on the proposed building. To be conservative, it is assumed the project could have eight (8) rooftop HVAC units and operate 24 hours per day and would generate sound power levels (SPL) of up to 87.9 dBA SPL, based on manufacturer data (Trane).

Trash Bin Emptying Activities
The project is estimated to have a trash dumpster near the western property line of the proposed project site. The trash emptying activities would occur for a period less than one minute and would generate sound power levels (SPL) of up to 118.6 dBA SPL or 84 dBA Leq at 50 feet, based on reference information within SoundPLAN.

Cold Storage Fan Units
According to the project description, approximately 10% of the project could be utilized for cold storage. Noise levels generated by cold storage fan units would be similar to noise readings from previously gathered reference noise level measurements, which generate a noise level of 57.5 dBA Leq at 60 ft based on measurements taken by LSA (Operational Noise Impact Analysis for Richmond Wholesale Meat Distribution Center [LSA 2016]).

Truck Deliveries and Truck Loading and Unloading Activities
Noise levels generated by delivery trucks would be similar to noise readings from truck loading and unloading activities, which generate a noise level of 75 dBA Leq at 20 ft based on measurements taken by LSA. Shorter term noise levels that occur during the docking process taken by LSA were measured to be 76.3 dBA L8 at 20 ft. Delivery trucks would arrive on site and maneuver their trailers so that trailers would be parked within the loading docks. During this process, noise levels are associated with the truck engine noise, air brakes, and back-up alarms while the truck is backing into the dock. These noise levels would occur for a shorter period of time (less than five minutes). After a truck enters the loading dock, the doors would be closed, and the remainder of the truck loading activities would be enclosed and therefore much less perceptible. To present a conservative assessment, it is assumed that truck arrivals and departure activities could occur twice in a given hour for a period of less than five (5) minutes each and unloading activities could occur at 13 docks simultaneously for a period of more than 30 minutes in a given hour.

Combined Project Operations
As show in the Appendix D, the operational noise levels associated with the proposed project would not exceed 75 dBA Leq at the project boundaries, therefore, noise levels would noise exceed the City's exterior noise level limit of 75 dBA Leq anytime for industrial uses. Tables K and L below show the combined hourly noise levels generated by HVAC equipment, cold storage fans, trash emptying activities, and truck delivery activities at the closest off-site, non-industrial, land uses. The project-related noise level impacts would approach 47.5 dBA at the office uses to the north during daytime and nighttime hours and 38.5 dBA at the school to the south during daytime hours. These levels would be well below the City's exterior daytime noise standard of 65 dBA Leq for office uses and the exterior daytime standard of 60 dBA Leq for institutional uses (school) as well as 60 dBA Leq for office uses during nighttime hours. It is assumed that project operations during the more sensitive nighttime hours would not affect the school use to the south as the school would not be in operation during those hours. The project-related noise level impacts would approach 47.5 dBA at the office uses to the north.

Because project noise levels would not generate a noise level increase of 4 dBA when ambient noise levels exceed the City's exterior noise standards or generate a noise level increase of 6 dBA when ambient noise levels are below the City's exterior noise standards, impacts to the surrounding areas from project operation would be less than significant.

b) Less than Significant Impact.

Construction Vibration Impacts

This construction vibration impact analysis discusses the level of human annoyance using vibration levels in root-mean-square (RMS) (in/sec) and assesses the potential for building damages using vibration levels in peak particle velocity (PPV) (in/sec). This is because vibration levels calculated in RMS are best for characterizing human response to building vibration, while vibration level in PPV is best for characterizing potential for damage. Table 16 shows the PPV and RMS values at 25 ft. from the construction vibration source. As shown in Table 16, bulldozers, and other heavy-tracked construction equipment (expected to be used for this project) generate approximately 0.089 PPV in/sec or 0.063 in/sec RMS of ground-borne vibration when measured at 25 ft. The distance to the nearest buildings for vibration impact analysis is measured between the nearest off-site buildings and the project construction boundary (assuming the construction equipment would be used at or near the project setback line).

Table 16
Vibration Source Amplitudes for Construction Equipment

Equipment	Reference PPV/RMS at 25 Feet	
	PPV (in./sec.)	RMS (in./sec.)
Pile Driver (Impact), Typical	0.644	0.457
Pile Driver (Sonic), Typical	0.170	0.121
Vibratory Roller	0.210	0.149
Hoe Ram	0.089	0.063
Large Bulldozer[1]	0.089	0.063
Caisson Drilling	0.089	0.063
Loaded Trucks[1]	0.076	0.054
Jackhammer	0.035	0.025
Small Bulldozer	0.003	0.002

Source: *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018).
[1] Equipment shown in **bold** is expected to be used on site.
ft = foot/feet
FTA = Federal Transit Administration
in/sec = inch/inches per second

Table 17
Potential Construction Vibration Annoyance Impacts at Nearest Receptor

Receptor (Location)	Composite Noise Level (dBA L_{eq}) at 50 Feet [1]	Distance (feet)	Composite Noise Level (dBA L_{eq})
Industrial Uses (West)	0.063	315	0.0014
Industrial Uses (South)		485	0.0007
Commercial Uses (North)		485	0.0007
School (South)		715	0.0004

Source: Compiled by LSA (2023).
[1] The reference vibration level is associated with a large bulldozer which is expected to be representative of the heavy equipment
used during construction.
[2] The reference distance is associated with the average condition, identified by the distance from the center of construction
activities to surrounding uses
ft = foot/feet
in/sec = inch/inches per second
RMS = root mean square velocity

Table 18
Potential Construction Vibration Damage Impacts at Nearest Receptor

Receptor (Location)	Composite Noise Level (dBA L_{eq}) at 50 Feet [1]	Distance (feet)	Composite Noise Level (dBA L_{eq})
Industrial Uses (West)	0.089	100	0.011
Industrial Uses (South)		140	0.007
Commercial Uses (North)		155	0.006
School (South)		380	0.002

Source: Compiled by LSA (2023).
[1] The reference vibration level is associated with a large bulldozer which is expected to be representative of the heavy equipment
used during construction.
[2] The reference distance is associated with the peak condition, identified by the distance from the perimeter of construction
activities to surrounding structures
ft = foot/feet
in/sec = inch/inches per second
PPV = peak particle velocity

As discussed above, the threshold at which vibration levels would result in annoyance would be 0.01 in/sec RMS and the FTA guidelines indicate that for a non-engineered timber and masonry building, the construction vibration damage criterion is 0.2 in/sec in PPV.

Based on the information provided in Table 17, vibration levels are expected to approach 0.0014 in/sec RMS at the closest industrial uses to the west and 0.0004 in/sec RMS at the closest sensitive use (School) to the south and would not exceed the annoyance thresholds.

Based on the information provided in Table 18, vibration levels are expected to approach 0.011 at the surrounding structures and would be below the 0.2 PPV in/sec threshold. Other building structures surrounding the project site are farther away and would experience further reduced vibration. Therefore, no construction vibration impacts would occur, impacts will be less than significant.

Operational Vibration Impacts
The proposed project would not generate vibration levels related to on-site operations. In addition, vibration levels generated from project-related traffic on the adjacent roadways are unusual for on- road vehicles because the rubber tires and suspension systems of on-road vehicles provide vibration isolation. Vibration levels generated from project-related traffic on the adjacent roadways would be less than significant.

c) Less than Significant Impact. Aircraft flyovers may be audible on the project site due to aircraft activity in the vicinity. The nearest airports to the project are San Bernardino International Airport (SBIA) and Redlands Municipal Airport (REI) approximately 3.30 miles to the northwest and northeast of project site, respectively. The project site is located well outside the SBD Airport Influence Area according to the 2017 Existing CNEL Contours and Generalized Land Uses – San Bernardino International Airport (San Bernardino County, 2017) as well as outside the REI 60 dBA CNEL Airport Noise Contour according to Figure 7-7: Airport Hazards in the City's General Plan.[35] Therefore, the project would not be adversely affected by airport/airfield noise, nor would the project contribute to or result in adverse airport/airfield noise impacts, and as such, impacts would be less than significant.

4.13 – Population and Housing

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Impact The project site is designated for light industrial uses and is currently occupied by a warehouse building and one unoccupied single-family home. Because the proposed project would replace an existing use, and potential employees of the proposed warehouse would be drawn from the existing population in the area, it is not anticipated that the proposed project would result in a substantial increase in the number of employees on the project site. In addition, the project does not involve the extension of roads or other major infrastructure improvements that would indirectly induce unplanned population growth. The project complies with the City of Redlands General Plan and Zoning Ordinance.[36] The project site is zoned as Light Industrial for industrial, manufacturing, and warehousing purposes. The project is consistent with this criterion and is consistent with the anticipated buildout of the City's General Plan and would not induce any unplanned population growth. Impacts will be less than significant.

b) No Impact. Currently there is a single-family home located on the project site, however the home is not occupied. No housing would be displaced as a result of project development and as such there will be no impact.

4.14 – Public Services

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:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Fire protection?	☐	☐	☑	☐
b) Police protection?	☐	☐	☑	☐
c) Schools?	☐	☐	☑	☐
d) Parks?	☐	☐	☑	☐
e) Other public facilities?	☐	☐	☑	☐

a) Less than Significant Impact. The project is located in the service area of the City of Redlands Fire Department. The Fire Department responds to medical emergencies, hazardous materials incidents, rescue calls, and motor-related accidents, in addition to regular fire suppression services. There are four stations in Redlands[37]:

- Fire Station 261: 525 E Citrus Ave.
- Fire Station 262: 1690 Garden St.
- Fire Station 263: 10 W Pennsylvania Ave.
- Fire Station 264: 1270 W Park Ave.

The fire station nearest to the project site is Station 264, located approximately one quarter mile to the north. Future tenants of the proposed industrial facility that may store and use hazardous materials would be required to adhere to local and state regulations pertaining to the handling and storage of such materials. The project may create an incremental increase in demand for fire services. Development impact fees that are collected at the time of building permit issuance for approved projects would offset any incremental in demand for fire protection and emergency medical services. Fees go towards fire facilities and charge at a current rate of $716.94 per 1,000 square feet of office space, and $223.67 per 1,000 square feet of warehouse space.[38] Impacts related to expansion of fire protection services will be less than significant.

b) Less than Significant Impact. The project area is served by the Redlands Police Department. The Police Department and Patrol building is located at 1270 W Park Ave, Building C, Redlands, CA 92373. The station is approximately 0.3 miles north of the project site. Development of the project site may generate an incremental increase in the need for police protection in the project area. However, this incremental increase is consistent with the buildout of the City's General Plan. The Police Department reviews its needs on a yearly basis and adjusts service levels as needed to maintain an adequate level

of public protection. Additionally, Development Impact Fees collected at the time of building permit issuance will help to offset incremental impacts of development on demand for services. Fees go towards law enforcement facilities and charge a current rate of $37.40 per 1,000 square feet of office space, and $11.67 per 1,000 square foot warehouse space.[39] Therefore, a less than significant impact to police services would occur.

c) Less than Significant Impact. The project includes construction of a warehouse facility, associated parking, and landscape improvements. The project will not result in any direct population growth, or associated growth in students, within the Redlands Unified School District. As most of the employees that would staff the warehouse could be expected to come from the local population, a substantial increase in the school populations is unlikely. However, payment of development impact fees required under State law would offset the cost of increased demand for school district facilities in the future. The Redlands Unified School District has established a school fee and charge a current rate of $0.56 per square foot of industrial development built.[40] Any project impacts on school facilities would be less than significant.

d) Less than Significant Impact. Development of the project could have the potential to impact demand on parks and recreation facilities if it induced substantial population growth in the area. However, as most of the staff of the warehouse could reasonably be expected to come from the local population, the project is not expected to induce significant change to the local population. As such, the proposed warehouse project will not result in any direct population growth that would require expansion or acquisition of recreational facilities. Less than significant impacts would occur.

e) Less than Significant Impact. The project is not expected to create an increase in residents that would generate additional demand for public facilities. However, payment of development impact fees required determined by the City of Redlands would offset the cost of increased demand for such facilities in the future. Fees for public facilities are at a current rate of $852.83 per 1,000 square feet of office space, and $266.06 per 1,000 square feet of warehousing.[41] Potential impacts to public facilities in Redlands would be less than significant.

4.15 – Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	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) No Impact. The project includes the demolition of the former 193,469 square foot La-Z-Boy warehouse, and the construction of a 197,397 square foot light industrial building. Employees of the warehouse would be drawn from existing residents within or near the City of Redlands. As such, the project itself would not create demand for additional parks, or other recreational activities as the workforce would be drawn from the existing population of the area and from additional housing planned by the City to accommodate anticipated buildout of the City's General Plan. There are no anticipated impacts to recreational facilities.

b) No Impact. The project does not include any recreational facilities or require the construction of new facilities, and there would not be an adverse physical effect to the environment. Therefore, there would be no impact.

4.16 – Transportation

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, 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 *Focused Traffic Analysis and VMT Screening Analysis* for the proposed project was prepared by EPD Solutions, Inc., dated January 30th, 2023 (See Appendix E). The information presented below is provided from the aforementioned evaluations.

a) Less than Significant Impact. The Focused Traffic Analysis and VMT Screening Analysis was prepared to determine whether the project meets the VMT requirements for the San Bernardino County Transportation Authority (SBCTA) Guidelines and screens out from needing to conduct a detailed analysis. In addition, CEQA Guidelines section 15064.3(A) states that Vehicle Miles Traveled is the most appropriate measure for transportation impacts, and Level of Service shall not be considered an environmental impact and "a project's effect on automobile delay shall not constitute a significant environmental impact" (for CEQA purposes). Table 19 below shows the estimated trip generation for the proposed project based on trip generation rates collected from the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021). The vehicle mix was also determined using the ITE Manual. The forecast was determined by using ITE Land Use Code 110 General Light Industrial, and 140 Manufacturing to derive net site specific trip generation estimates for the proposed 197,397 square foot warehousing project, which includes the storage and cold storage of materials and the use of office and maintenance areas.

The trip generation takes credit for the existing warehouse and single-family house. As shown in Table 19, the existing manufacturing use is estimated to generate a total of 919 daily trips including 132 AM peak hour trips and 143 PM peak hour trips whereas the single-family house is estimated to generate a total of 9 daily trips including 1 AM peak hour trip and 1 PM peak hour trip. When adjusted for heavy truck trips and applying a passenger car equivalent (PCE) factors the existing manufacturing use would generate 1,307 daily trips including 190 PCE trips during the AM peak hour and 206 PCE trips during

the PM peak hour. In total, the existing land use generates 1,316 daily PCE trips, 191 PCE trips during the AM peak hour and 207 PCE trips during the PM peak hour. The proposed general light industrial use, including 10% cold storage, would generate 1,387 daily PCE trips, 212 PCE trips during the AM peak hour, and 187 PCE trips during the PM peak hour.

The resulting net trip generation on the project site would result in 71 daily PCE trips, 21 PCE trips during the AM peak hour, and -20 PCE trips during the PM peak hour. The project trips were distributed throughout the study area based on logical travel paths and patterns. The project truck and passenger car trip distribution and the project trip assignment are provided in Appendix E.

Table 19
Proposed Project Trip Generation

Land Use		Units	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
Trip Rates									
General Light Industrial		TSF	0.65	0.09	0.74	0.09	0.56	0.65	4.87
Manufacturing		TSF	0.52	0.16	0.68	0.23	0.51	0.74	4.75
Single-Family Detached Housing		DU	0.182	0.518	0.7	0.5922	0.3478	.94	9.43

Existing Trip Generation		Units	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
Existing Manufacturing Building	193,469	TSF	-100	-32	-132	-44	-99	-143	-919
Vehicle Mix[2]		**Percent[2,4]**							
Passenger Vehicles		72.50%	-73	-23	-96	-32	-72	-104	-666
2-Axle truck		4.60%	-5	-1	-6	-2	-5	-7	-42
3-Axle truck		5.70%	-6	-2	-8	-3	-6	-9	-52
4+ -Axle trucks		17.20%	-17	-6	-23	-8	-17	-25	-158
Total		**100%**	**-101**	**-31**	**-132**	**-45**	**-100**	**-145**	**-919**

PCE Trip Generation[3]		PCE Factor	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
Passenger Vehicles		1.0	-73	-23	-96	-32	-72	-104	-666
2-Axle truck		1.5	-8	-1	-9	-3	-8	-11	-63
3-Axle truck		2.0	-12	-4	-16	-6	-10	-16	-104
4+ -Axle trucks		3.0	-51	-18	-69	-24	-51	-75	-474
Existing Manufacturing Building (PCE)			**-144**	**-46**	**-190**	**-65**	**-141**	**-206**	**-1307**

Single Family Residential[6]									
Passenger Vehicles	1	**DU**	-1	-1	-1	-1	-1	-1	-9

Total Existing Trip Generation			-101	-33	-133	-45	-100	-144	-928
Total Existing Trip Generation (PCE)			-145	-47	-191	-68	-142	-207	-1316

Proposed Project Trip Generation		Units	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
Proposed General Light Industrial	197,397	TSF	129	18	146	18	110	128	961
Vehicle Mix (90% Warehousing)[2]		**Percent[2]**							

Passenger Vehicles		72.50%	84	12	96	12	72	84	627
2-Axle truck		4.60%	5	1	6	1	5	6	40
3-Axle truck		5.70%	7	1	8	1	6	7	49
4+ -Axle trucks		17.20%	20	3	23	3	17	20	149
Total		**100%**	**116**	**17**	**133**	**17**	**100**	**117**	**865**

Vehicle Mix (10% Cold Storage)[5]		**Percent[5]**							
Passenger Vehicles		55.30%	7	1	8	0	7	7	53
2-Axle truck		15.50%	2	0	2	0	1	1	15
3-Axle truck		4.90%	1	0	1	0	0	0	5
4+ -Axle trucks		24.30%	3	0	3	0	3	3	23
Total		**100%**	**13**	**1**	**14**	**0**	**11**	**11**	**96**

PCE Trip Generation[3]		**PCE Factor**	**AM Peak Hour**			**PM Peak Hour**			**Daily**
			In	**Out**	**Total**	**In**	**Out**	**Total**	
Passenger Vehicles		1.0	91	13	104	12	79	91	680
2-Axle truck		1.5	11	2	13	2	9	11	83
3-Axle truck		2.0	16	2	18	2	12	14	108
4+ -Axle trucks		3.0	69	9	78	9	60	69	516
Proposed General Light Industrial Building (PCE)			**187**	**26**	**213**	**26**	**160**	**185**	**1387**
Total Existing Trip Generation (PCE)			**-144**	**-44**	**-188**	**-66**	**-143**	**-209**	**-1317**
NET PCE Trip Generation			**43**	**-18**	**25**	**-41**	**17**	**-24**	**70**

TSF = Thousand Square Feet
PCE = Passenger Car Equivalent
[1] Trip rates from the Institute of Transportation Engineers, Trip Generation, 11th Edition, 2021. Land Use Code 110 General Light Industrial, 140 Manufacturing.
[2] Vehicle Mix from the Warehouse Truck Trip Study Data Results and Usage, Southern California Air Quality Management District Warehouse Truck Trip Study July 17, 2014. Without Cold Storage.
[3] Passenger Car Equivalent (PCE) factors from the San Bernardino County CMP, Appendix B – Guidelines for CMP Traffic Impact Analysis Reports in San Bernardino County, 2016.
[4] Total trip generation for this line rounded to match non-vehicle mix trip generation estimate.
[5] Vehicle Mix from the Warehouse Truck Trip Study Data Results and Usage, Southern California Air Quality Management District Warehouse Truck Trip Study July 17, 2014. With Cold Storage.

Measure U Focused Traffic Analysis

Measure U was an initiative approved by the voters of Redlands in 1997 to enact several principles of managed development within the City of Redlands. The principles in Measure U have been incorporated throughout the new 2035 General Plan, as well as several sections of the Redlands Municipal Code. The Focused Traffic Analysis evaluated the project using the applicable Measure U Policies identified in the Connected City Element of the City of Redlands 2035 General Plan as well as the County of San Bernardino Transportation Impact Study Guidelines (TIS Guidelines). The Measure U Policies are largely based on Level of Service (LOS) standards that measure traffic congestion. A detailed LOS evaluation is included in the Focused Traffic Analysis (See Appendix E) in order to demonstrate project compliance with Measure U. Each Measure U policy is provided below followed by a brief explanation of how the project complies with the policy.

Policy 5.20a: Maintain LOS C or better as the standard at all intersections presently at LOS C or better.

As shown in Table 20 of the Focused Traffic Analysis, all study intersections currently operate at LOS C or better except for the intersection of Kansas Street and State Street during the AM Peak hour. The addition of project traffic would not cause any location to deteriorate from LOS C to worse than LOS C.

> *Policy 5.20b: Within the area identified in GP Figure 5-1, including that unincorporated County area identified on GP Figure 5-1 as the "donut hole", maintain LOS C or better; however, accept a reduced LOS on a case-by-case basis upon approval by a four-fifths (4/5ths) vote of the total authorized membership of the City Council.*

It is to be noted that Measure U Policy 5.20b would not apply since the project is not within the area identified in GP Figure 5-1.

> *5.20c: Where the current level of service at a location within the City of Redlands is below the Level of Service (LOS) C standard, no development project shall be approved that cannot be mitigated so that it does not reduce the existing level of service at that location except as provided in Section 5.20b.*

As shown in Table 20, the intersection of Kansas Street and State Street would operate at LOS F during the AM peak hour. Addition of project traffic would not change the delay or LOS at the intersection. Therefore, no mitigation is necessary as the project does not reduce the existing level of service at the intersection.

> *5.20f: If monitoring of conditions at intersections within the East Valley Corridor Specific Plan area and intersections affected by EVC development indicates that peak hour LOS will drop below the standards set by Policies 5.20a, 5.20b, 5.20c revise the EVC Specific Plan. Revisions necessary may include additional roadway improvements, mandated higher TDM (Travel Demand Management, See Section 5.40) reductions in single-occupant vehicle trip share, reduction of intensity of development, or changes in use of undeveloped sites.*

As discussed above, the project does not result in a drop in LOS at any intersection and therefore would not cause the LOS to drop below the referenced standards. The proposed project's study area intersections were evaluated with and without project trips to comply with the City's Measure U policies by determining if the project would cause any LOS deficiencies. As previously noted, CEQA Guidelines section 15064.3(A) states that Vehicle Miles Traveled is the most appropriate measure for transportation impacts, and Level of Service shall not be considered an environmental impact and "a project's effect on automobile delay shall not constitute a significant environmental impact" (for CEQA purposes). All study area intersections would operate at satisfactory LOS in the Existing and Existing Plus Project Conditions except for the intersection of Kansas Street and State Street which would continue to operate at an LOS F; however, the project does not impact the intersection since it does not increase the time delay. As such, the project would not result in any unsatisfactory LOS; therefore, the project would be in compliance with Measure U, no improvements would be required, and impacts would be less than significant.

b) Less than Significant Impact. In December 2018, the California Natural Resources Agency certified and adopted the updated CEQA Guidelines package. The amended CEQA Guidelines, specifically Section 15064.3, recommend the use of Vehicle Miles Travelled (VMT) as the primary metric for the evaluation of transportation impacts, under CEQA, associated with land use and transportation projects. In general terms, VMT quantifies the amount and distance of automobile travel attributable to a project or region. All agencies and projects State-wide are required to utilize the updated CEQA guidelines recommending the use of VMT for evaluating transportation impacts as of July 1, 2020. CEQA Guidelines allow for lead agency discretion in establishing methodologies and thresholds provided there is substantial evidence to demonstrate that the established procedures promote the

intended goals of the legislation. The City of Redlands CEQA Assessment VMT Analysis Guidelines provides guidelines for analysis of transportation impacts under CEQA. The guidelines also provide three types of screening that can be applied to determine if a project is exempt from project-level VMT analysis. The project was screened using the SBCTA VMT Screening Tool. If a project meets one of the following criteria, then the VMT impact of the project is considered less-than significant and no further analysis of VMT would be required:

1. The project is located within a Transit Priority Area.
2. The project is located in a low VMT generating area.
3. The project is considered a local serving use or would generate less than 3,000 metric tons of CO2 equivalent (3,000 MT CO2e) per year.

Below are the results of the screening criteria satisfaction for the project:

Screening Criteria 1 – The project is located within a Transit Priority Area:
The SBCTA tool illustrates that a majority of the project site is located within a Transit Priority Area, however this criterion would not apply as the project has a floor area ratio (FAR) of 0.44. The City of Redlands CEQA Assessment VMT Analysis Guidelines state that this criterion should be applied to projects with an FAR of 0.75 or more.

Screening Criteria 2 – Low VMT Generating Area:
The City's guidelines include a screening threshold for projects located in a low VMT generating area. The project's site was evaluated using the SBCTA VMT Screening Tool as discussed previously. The project is located within TAZ 53827301. The criteria applied to this project was 15% below the County baseline using the Origin-Destination VMT per Service Population. As shown in Appendix E, the Countywide VMT/Service Population is 33.3 and the threshold would be 28.3 VMT/Service Population. The screening tool indicates that these TAZs have an OD VMT/Service Population of 61.7. This is 85.29% above the threshold and would not be considered to generate a low VMT.

Screening Criteria 3 - The project is considered a local serving use or would generate less than 3,000 metric tons of CO2 equivalent (3,000 MT CO2e) per year.
Under the Project Type Screening criteria, projects which generate less than 3,000 MT CO2e per year can be presumed to have a less than significant impact on VMT. The project meets the criteria for classification as a warehousing land use. The City of Redlands guidelines state that warehousing uses of 463,400 square feet or less are presumed to generate less than 3,000 metric tons of CO2 equivalent (3,000 MT CO2e) per year and can be presumed to result in a less than significant VMT impact.

The proposed project is determined to have a less than significant impact on VMT since it satisfies one of more of the VMT screening criteria established by the City of Redlands CEQA Assessment VMT Analysis Guidelines. The project's VMT impact is considered less than significant and no additional VMT analysis is required.

c) Less than Significant Impact. A significant impact would occur if the proposed project substantially increased an existing hazardous design feature or introduced incompatible uses to the existing traffic pattern. Access to the site would be provided via four driveways; two driveways on Tennessee Street: a 40-foot truck accessible driveway located at the northeast corner of the site and a 30-foot driveway for passenger cars only located at the southeast corner of the project. Additionally, a 40-foot driveway for truck access will be located on West State Street, and another 40-foot driveway for both truck and passenger car access will be located on Kansas Street. The project does not involve any changes to the alignment or uses of existing roadways, and the proposed project is consistent with City of Redlands driveway spacing and design requirements. Construction operations occurring on site would comply with

the California Building Code adopted in the City of Redlands Municipal Code.[42] The proposed project would not result in a traffic safety hazard due to any design features, and impacts would be less than significant.

d) Less than Significant Impact. A significant impact would occur if the design of the proposed project would not satisfy emergency access requirements of the City of Redlands Fire Department or in any other way threaten the ability of emergency vehicles to access and serve the project site or adjacent uses. The proposed project would not result in inadequate emergency access. As previously discussed above, access to the site will be provided via four driveways; a 40-foot truck accessible driveway and a 30-foot driveway passenger car driveway on Tennessee Street, a 40-foot truck accessible driveway on West State Street, and another 40-foot truck and passenger car accessible driveway on Kansas Street. The driveway width is sufficient to provide access to fire and emergency vehicles and is consistent with California Fire Code requirements. All access features are subject to and must satisfy the City of Redlands design requirements, including the Fire Department's requirements. This project would therefore not result in adverse impacts with regard to emergency access. Impacts would be less than significant.

4.17 – Tribal Cultural Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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 Cultural 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 Incorporated. A significant impact would occur if the proposed project would cause a substantial adverse change in the significance of a tribal cultural resource listed or eligible for listing in the California Resources of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). The project site is currently developed, and there are no historic resources on, adjacent to, or in proximity to the project site listed in the California Register of Historical Resources pursuant to Section 15064.5. The City does not have any landmarks listed under its historic preservation program as defined in Public Resources Code Section 5020.1(k). However, in compliance with Assembly Bill 52, Native American tribes traditionally and culturally affiliated with the geographic area of the Project site were notified of the proposed Project on September 22, 2022 (See Appendix D). The tribes notified included:

- Gabrieleno Band of Mission Indians – Kizh Nation
- Morongo Band of Mission Indians
- Soboba Band of Luiseno Indians
- Torres Martinez Desert Cahuilla Indian
- The Yuhaaviatam of San Manuel Nation (formerly known as the San Manuel Band of Mission Indians)

On September 26, 2022, the City received a response from Ryan Nordness, Cultural Resources Analyst for the Yuhaaviatam of San Manuel Nation (YSMN). In the email, Mr. Nordness noted the project site is located in the Serrano ancestral territory and is of interest to the Tribe. However, given the "nature and location of the project" and the current state of knowledge regarding the area, YSMN has no concerns with the implementation of the project as planned. Furthermore, in the response, the YSMN requested that mitigation measures be included to reduce potential impacts to less than significant. Therefore, with incorporation of **Mitigation Measures TCR-1 and TCR-2**, impacts to listed or eligible tribal cultural resources would be less than significant.

a.ii) Less than Significant with Mitigation Incorporated. Government Code §§ 65352.3 and 65562.5 (SB 18); and Public Resources Code §§ 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3 (AB 52) provide that a project that may cause a substantial adverse change to a defined Tribal Cultural Resource (TCR) can result in a significant effect on the environment. AB 52 requires tribes interested in development projects within a traditionally and culturally affiliated geographic area to notify a lead agency of such interest and to request notification of future projects subject to CEQA prior to determining if a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. The Lead Agency is required to notify tribes within 14 days of deeming a development application complete subject to CEQA to notify the requesting tribe as an invitation to consult on the project. AB 52 identifies examples of mitigation measures that will avoid or minimize impacts to TCR. The bill makes the above provisions applicable to projects that have a notice of preparation or a notice of intent to adopt a negative declaration/mitigated negative declaration circulated on or after July 1, 2015. Although there is no indication of TCRs at the project site, AB 52 is clear in stating that it is the responsibility of the Public Agency (i.e., Lead Agency) to consult with Native American tribes early in the CEQA process to allow tribal governments, lead agencies, and project proponents to discuss the appropriate level of environment review, identify and address potential adverse impacts to TCRs, and reduce the potential for delay and conflict in the environmental review process (see Public Resources Code Section 2108.3.2). Specifically, government-to-government consultation may provide "tribal knowledge" of the project area that can be used in identifying TCRs that cannot be obtained through other investigative means. Pursuant to AB 52, as the CEQA Lead Agency, the City of Redlands sent AB 52 consultation notification letters via email on September 22, 2022. On September 26, 2022, the City received a response from Ryan Nordness, Cultural Resources Analyst for the Yuhaaviatam of San Manuel Nation (YSMN). In the email, YSMN requested that mitigation measures be included to reduce potential impacts to less than significant. Therefore, with incorporation of **Mitigation Measures TCR-1 and TCR-2**, impacts to listed or eligible tribal cultural resources would be less than significant.

Mitigation Measures

TCR-1 **Cultural Resources Monitoring and Treatment.** The Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, as detailed in CUL-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 YSMN, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents YSMN for the remainder of the project, should YSMN elect to place a monitor on-site.

TCR-2 **Archaeological Documentation.** 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 YSMN. The Lead Agency and/or applicant shall, in good faith, consult with YSMN throughout the life of the project.

4.18 - Utilities and Service Systems

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, 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 and 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 Impact. The Redlands Municipal Utilities & Engineering Department delivers water to over 23,000 service connections throughout its service area, including those in Redlands, Mentone, parts of Crafton Hills, San Timoteo Canyon, and San Bernardino. The Department receives its water from a mix of sources including local groundwater wells, the Mill Creek Watershed, Santa Ana Watershed, and imported water provided through the State Water Project. The City utilizes 23 groundwater wells, 44 booster pumps, 18 reservoirs, and 450 miles of transmission lines to deliver water.[43] Additionally, the City operates two surface water treatment plants, Tate and Hinkley, which provide treated water from the Mill Creek and Santa Ana watersheds respectively, and State Water Project (SWP).[44] The City maintains ownership in multiple local private and mutual water companies to

bolster and secure reliable water supplies for their treatment plants. Wastewater is collected and treated at the Redlands Wastewater Treatment Facility and has a treatment capacity of 9.5 million gallons.

As discussed in the Hydrology and Water Quality section and Project Description, the project would install new water and sewer lines onsite connecting to the existing infrastructure in Redlands. The project would not generate substantially increased runoff from new impermeable surfaces on site. As part of the proposed project, catch basins and landscape drains will collect surface runoff onsite for treatment. The subsurface storm drain would move surface flows to an underground infiltration system located in the northwestern area of the project site. No additional improvements are anticipated to either sewer lines or treatment facilities to serve the project. Standard connection fees would address any incremental impacts of the project. Therefore, the project would result in less than significant impact as a result of new or expanded water supply and wastewater treatment facilities.

Impacts related to electric power, natural gas, and telecommunications facilities would also be less than significant. The project will connect to existing facilities and will not require any extension of services. Therefore, the proposed warehouse would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause a significant environmental effect. Less than significant impacts would occur.

b) Less than Significant Impact. According to the *2020 Integrated Regional Urban Water Management Plan* (*UWMP*) for the Upper Santa Ana River Watershed Region, the City of Redlands is projected to have a total demand of 25,818 acre-feet (AF) in 2025.[45] The same estimates calculated a supply total of 31,039 AF in 2020, a difference of 5,221 AF. The project would generate a marginal increase in additional demand for water from the City of Redlands' water supply, relative to overall existing citywide demand. As the Urban Water Management Plan anticipates an overall increase in demand associated with development in the area over 2015 conditions, and the proposed project is within the expected buildout and zoning of the City, water demand for this project is within that demand assumption, and as such, impacts would be less than significant. The project would not substantially deplete water supplies, and the project would have a less than significant impact on entitled water supplies.

c) Less than Significant Impact. Potentially significant impacts could occur as a result of this project if it results in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. As detailed in Sections 4.19.a and 4.19.b, the project would be adequately served by existing wastewater treatment facilities. Therefore, a less than significant impact would occur.

d) Less than Significant Impact. Significant impacts could occur if the proposed project would exceed the existing permitted landfill capacity or violates federal, state, and local statutes and regulations. Solid waste disposal services are overseen by the City of Redlands Trash Collection. Solid waste collected in Redlands is primarily transferred to the San Timoteo Landfill in Redlands, located approximately 6 miles south of the project site. According to CalRecycle, the San Timoteo Landfill has a maximum capacity of 23,685,785 tons, with a remaining capacity of 12,360,396 tons measured April 30th, 2019.[46] Construction of the facility is anticipated to generate some solid waste, with an estimated total waste generation of approximately 5044.3 lbs., per employee, per year.[47] Because there would be adequate landfill capacity in the region to accommodate project-generated waste, and the proposed project is not expected to generate a substantial quantity of solid waste, impacts to solid waste disposal capacity would be less than significant.

e) No Impact. The proposed project is required to comply with all applicable federal, state, County, and City statutes and regulations related to solid waste as a standard project condition of approval. Therefore, no impact would occur.

4.18 – 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 Incorporated	Less Than Significant Impact	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 other utilities) that may exacerbate fire risk or that may result in temporary or 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) No Impact. The project site is not located within or near any State Responsibility Areas, the nearest being in adjacent Loma Linda as part of the San Timoteo Canyon.[48] There are no wildland conditions in the urbanized area where the project site is located. The City's General Plan identifies several evacuation routes; these routes were previously designated as potential evacuation routes in the 2007 San Bernardino General Plan.[49] These include: Interstates 10, 15, 210, and 215, and State Highways 30, 60, 66, 71, and 83. In the event of an earthquake, the following roads would provide safe access out of the San Bernardino Valley, as indicated by Caltrans and cited in the Redlands General Plan:

- Hospitality Lane from Tippecanoe Avenue to Waterman Avenue
- Coulston Street from Mountain View Avenue to Tippecanoe Avenue
- Lugonia Avenue from Orange Street to Mountain View Avenue
- Redlands Boulevard from Orange Street to Waterman Avenue

The proposed project would not interfere with the availability of these highways and roadways as evacuation routes. The project would not substantially impair any adopted or informal emergency response plan or evacuation plan, as such no impact would occur.

b) No Impact. The project site is not located within a fire hazard zone, as identified on the Very High Fire Hazard Severity Zone (VHFHSZ) maps prepared by the California Department of Forestry and Fire Protection (CALFIRE).[50] The nearest VHFHSZ is located approximately 3 miles southwest of the project site just south of Beaumont Avenue in Loma Linda. The project site is located in a heavily urbanized area and would not exacerbate wildfire risks, thereby exposing occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No impact would occur.

c) No Impact. The project site is not located within or near any State Responsibility Areas as indicated in Section 4.18a. None of the project improvements would exacerbate fire risk or would result in a temporary or ongoing impact from wildfires requiring the installation or maintenance of associated infrastructure that may exacerbate fire risk, or that may result in temporary or ongoing impacts to the environment. No impact would occur.

d) No Impact. The project site is not located within or near any State Responsibility Areas. According to the Federal Emergency Management Agency (FEMA) Flood Maps, the project site is in an area of 1% annual chance flood.[51] The project site is not located in a dam inundation area. The project site is located in a flat area, with little to no potential for landslides or downstream flooding or runoff. If such an event were to occur, the City of Redlands General Plan outlines policies and principles to mitigate potential impacts from flooding. Development of the proposed project would not exacerbate risks to people from flooding or landslides. No impacts would occur.

4.19 – Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially 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, substantially 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?	☐	☑	☐	☐
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 Impact. The proposed project would not substantially impact any scenic vistas, scenic resources, or the visual character of the area, as discussed in Section 4.1, and would not result in excessive light or glare. The project site is located within a developed area with no natural habitat. The proposed project would not significantly impact any sensitive plants, plant communities, fish, wildlife, or habitat for any sensitive species. Impacts to burrowing owl and migratory birds will be less than significant with mitigation and adherence to existing regulations. There are no jurisdictional waters on the project site. There will be no impacts to possible historical or archaeological resources.

The environmental analysis provided in Section 4.3 concludes that impacts related to emissions of criteria pollutants and other air quality impacts would be less than significant with mitigation. Section 4.8 concludes that impacts related to climate change would be less than significant. Impacts related to hydrology and water quality would be less than significant. Based on the preceding analysis of potential impacts in the responses to items 4.1 through 4.20, no evidence is presented that this proposed project would degrade the quality of the environment. Impacts related to degradation of the environment, biological resources, hydrology and water quality would be less than significant.

b) Less than Significant Impact. Cumulative impacts can result from the interactions of environmental changes resulting from one proposed project with changes resulting from other past, present, and future projects that affect the same resources, utilities and infrastructure systems, public services, transportation network elements, air basin, watershed, or other physical conditions. Such

impacts could be short-term and temporary, usually consisting of overlapping construction impacts, as well as long-term, due to the permanent land-use changes and operational characteristics involved with the proposed project. Cumulative impacts would be less than significant, as further discussed herein.

Aesthetics

Impacts related to aesthetics at the project-level have no potential for cumulative impacts because impacts are limited to on-site conditions and include no component that could result in similar impacts over time or space. Therefore, no cumulative impacts related to this topic would occur.

Agricultural Resources

The analysis provided in Sections 4.2 found that no individual impacts would occur; therefore, the Project could not contribute considerably to local agriculture or forestry.

Air Quality

The analysis provided in Section 4.3 and the Air Quality Health Risk Assessment found that impacts would be less than significant with adherence to the recommended mitigation below:

AIR-1: During construction of the proposed project, the project contractor shall ensure all off-road diesel-powered construction equipment of 50 horsepower or more used for the project is equipped with Level 3 diesel particulate filters or equivalent.

Biological Resources

The analysis provided in Section 4.4 found that no individual impacts to sensitive species or migratory birds would occur with implementation of mitigation; therefore, the project would not contribute considerably to regional impacts on such species, and impacts would be less than significant. project would have no other impacts on biological resources and would not result in localized or regional cumulative impacts, and as such, impacts would be less than significant. Mitigations for nesting birds include the following:

BIO-1: If vegetation removal is scheduled during the nesting season (typically February 1 to September 1), then a focused survey for active nests shall be conducted by a qualified biologist no more than five (5) days before the beginning of project-related activities (e.g., demolition, excavation, grading and vegetation removal). Surveys must be conducted in proposed work areas, staging and storage areas, and soil, equipment, and material stockpile areas. For passerines and small raptors, surveys must be conducted within a 250-foot radius surrounding the work area (in non-developed areas and where access is feasible). For larger raptors, such as those from the genus *Buteo*, the survey area must encompass a 500-foot radius. Surveys must be conducted by a qualified biologist during weather conditions suited to maximize the observation of possible nests and concentrate on areas of suitable habitat. If a lapse in project-related work of five days or longer occurs, an additional nest survey is required before work can be reinitiated. If nests are encountered during any preconstruction survey, a qualified biologist must determine if it may be feasible for construction to continue as planned without impacting the success of the nest, depending on conditions specific to each nest and the relative location and rate of construction activities. Any nest(s) within the project site shall be monitored by a qualified biologist during vegetation removal if work is occurring directly adjacent to the pre-determined no-work buffer. If the qualified biologist determines construction activities have potential to adversely affect a nest, the biologist will immediately inform the construction manager to halt construction activities within minimum exclusion buffer of 50 feet for songbird nests, and 200 to 500 feet for raptor nests, depending on species and location. Construction activities within the no-work buffer may proceed after a

qualified biologist determines the nest is no longer active due to natural causes (e.g., young have fledged, predation or other non-anthropogenic nest failure).

Cultural Resources

The analysis provided in Section 4.5 and the Historical/Archaeological Resources Survey found that impacts to historic or archaeological resources would be less than significant with adherence to the recommended Mitigation measures below. Mitigations for Cultural Resources include the following:

CUL-1: **Buried Cultural Resources.** In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, as detailed within TCR-1, regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.

CUL-2: **Monitoring 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 YSMN for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.

CUL-3: **Funerary Discovery.** If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.

Energy

The analysis provided in Section 4.6 found that no individual impacts related to energy use would occur as a result of the proposed project. Therefore, the project would not contribute to cumulative energy impacts.

Geology and Soils

Impacts related to geology at the project-level have no potential for cumulative impacts. Therefore, the proposed project would have no contribution to potential geological or soil degradation or other such impacts. If during construction operations, paleontological resources are discovered, **Mitigation Measure GEO-1** is given to establish proper care and attention to such discoveries. Impacts related to this topic would be less than significant. Mitigation for Geology and Soils are as follows:

GEO-1: If paleontological materials are uncovered during grading or other earth moving activities, the contractor shall be required to halt work in the immediate area of the find, and to retain a professional paleontologist to examine the materials to determine whether it is a significant paleontological resource. If this determination is positive, resource shall be left in place, if determined feasible by the project paleontologist. Otherwise, the scientifically consequential information shall be fully recovered by the paleontologist. Work may continue outside of the area of the find; however, no further work shall occur

in the immediate location of the find until all information recovery has been completed and a report concerning it filed with the Community Development Director. The applicant shall bear the cost of implementing this mitigation.

Greenhouse Gas Emissions

As discussed in Section 4.8, climate change is the result of numerous, cumulative sources of greenhouse gas emissions all over the world. The project would not contribute considerably to global climate change.

Hazardous Materials

The analysis provided in Section 4.9 related to hazards and hazardous materials, and the associated Phase I Environmental Site Assessment found that impacts would be less than significant with adherence to the following mitigation measures listed below. Additionally, compliance with all regulations related to the disposal and storage of household hazardous waste would ensure that impacts would be less than significant.

HAZ-1 **Soil Testing.** Prior to issuance of a grading permit, representative soil sampling will be conducted onsite at depths of one and three feet and tested for organochlorine pesticides (OCPs) and heavy metals which may be present from past agricultural activities. The developer shall retain a qualified environmental professional (QEP) to design and supervise the sampling and testing. A final report shall be prepared summarizing the results of this testing and where onsite soils meet current industrial standards for sampled materials.

If the QEP determines that all onsite soil meets industrial standards, no further action is required. If onsite soils do not meet industrial standards, the QEP will work with the developer and grading contractor to determine how onsite soils can be mixed with clean offsite or imported soils to achieve the industrial standard for the entire site. The QEP, developer, and grading contractor shall also identify if or how much soil needs to be removed from the site. The collection and disposal of any excavated contaminated soils shall be in accordance with applicable hazardous materials regulations.

HAZ-2 **Soil Vapor Extraction (SVE) System.** Onsite SVE remediation activities began in September 2022 and were ongoing during preparation of the CEQA document. Two deep extraction wells (SVE-1 and SVE-2) are located on the northern and western portions of the site outside of the existing warehouse building. However, these wells would be impacted by development of the new warehouse project. Based on ongoing soil vapor monitoring, the existing SVE remediation activities will be completed by June 2023. These activities must be completed, and a final report submitted to the City prior to issuance of a grading permit for the new warehouse. Regulatory oversight and approval of this system will be at the discretion of the San Bernardino County Fire Department as the County's Certified Unified Program Agency (CUPA). If the CUPA declines to be the regulatory authority for this oversight, the applicant shall enter into a Voluntary Cleanup Program (VCP) with the California Department of Toxic Substances Control (DTSC). The applicant must document the site meets all applicable health standards for groundwater and soil per the appropriate regulatory authority discussed above before a grading permit can be issued. Additional details on the SVE system can be found in Roux's SVE Pilot Test Technical Memorandum dated January 4, 2023 and the DRAFT Construction Completion Report dated March 3, 2023.

Once it is documented that applicable health standards have been met by the existing SVE activities, they can be shut down and all wells and subsurface piping shall be removed from the site. Confirmatory soil vapor samples will then be used to conduct a post-remediation human health risk assessment (HHRA). If the post-remediation HHRA shows risk less than 1:1,000,000 ("one in a million new cancer deaths"), no additional work associated with residual VOC concentrations is required (i.e., Mitigation Measure HAZ-3 is not required). If the post-remediation HHRA shows risk greater than 1:1,000,000 then the developer shall implement Mitigation Measure HAZ-3.

HAZ-3 **Vapor Intrusion Mitigation System (VIMS).** If the post-remediation HHRA outlined in HAZ-2 shows risk greater than 1:1,000,000, a passive sub-slab Vapor Intrusion Mitigation System (VIMS) shall be installed beneath the future warehouse building. The VIMS will generally consist of the following components (from bottom to top): (1) Gravel bed above the certified pad; (2) Horizontal perforated piping within the gravel bed to capture and convey residual vapors; (3) Spray-applied barrier above the gravel bed and below the building slab; and (4) Vertical risers to vent vapors to the atmosphere above the roof line.
If the VIMS is determined to be necessary, it shall be designed by a qualified professional engineer (P.E.) licensed in California. The VIMS design will be finalized prior to the start of building construction.

The VIMS system shall be designed to allow regular monitoring of vapor concentrations. After occupancy, monitoring shall be conducted and documented quarterly for the first year, semi-annually the second year, and annually thereafter for five years.

The installation and monitoring of the VIMS system shall be under the oversight of the City Engineering Department in consultation with the County Fire Department, Hazardous Materials Division as the Certified Unified program Agency (CUPA) for the County.

HAZ-4 **Soil Management Plan (SMP).** After remediation is complete and prior to grading and earth movement, a Soil Management Plan (SMP) shall be prepared to provide protocols and procedures if unexpected or unknown subsurface conditions are encountered at the project site. The SMP will be shared with all contractors involved with earth movement and import activities, if any. The SMP will identify parties to be contacted if unexpected or unknown conditions are encountered, including an environmental professional and regulatory agencies if necessary (e.g., if an underground storage tank is encountered).

Land Use and Planning

The analysis provided in Section 4.11 related to Land Use and Planning found that impacts would be less than significant; therefore, while the proposed project would contribute to individual, localized, or regional cumulative impacts, its contribution would not be considerable.

Mineral Resources

The analysis provided in Section 4.12 related to mineral resources found that there would be no impact; therefore, while the project would contribute to localized or regional cumulative impacts, the project contribution would not be considerable.

Noise

As discussed in Section 4.13, on-site operational noise is not anticipated to result in perceptible increases in ambient noise with the implementation of Best Management Practices. Therefore, the proposed project would not contribute considerably to noise levels in the immediate vicinity of the project. The project would contribute to temporary increases in noise levels in the immediate project vicinity during construction activities; however, Best Management Practices would be incorporated to ensure that impacts to nearby sensitive receptors remain less than significant. Therefore, the project would have no considerable contribution to cumulative noise impacts.

Population and Housing

The analysis provided in Section 4.14 related to Population and Housing found that no impacts would result; therefore, no cumulative impacts related to this topic would occur.

Public Services

The analysis provided in Section 4.15 related to Public Services found that impacts would be less than significant; therefore, while the proposed project would contribute to localized cumulative impacts, the contribution would not be cumulatively considerable.

Recreation

The analysis provided in Section 4.16 related to Recreation found that impacts would be less than significant; therefore, no cumulative impacts related to this topic would occur.

Traffic and Transportation

Traffic conditions were analyzed in Section 4.17 and found to be less than significant. The proposed project's contribution to cumulative impacts to local and regional transportation facilities would not be considerable.

Tribal Cultural Resources

The analysis provided in Section 4.18, the Historical/Archaeological Resources Survey, and consultation with the Yuhaaviatam of San Manuel Nation (YSMN), found that impacts to tribal cultural resources will be less than significant with adherence to the recommended Mitigation measures below. Mitigations for Cultural Resources include the following:

TCR-1 **Cultural Resources Monitoring and Treatment.** The Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, as detailed in CUL-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 YSMN, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents YSMN for the remainder of the project, should YSMN elect to place a monitor on-site.

TCR-2 **Archaeological Documentation.** 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 YSMN. The Lead Agency and/or applicant shall, in good faith, consult with YSMN throughout the life of the project.

Utilities and Service Systems

The analysis provided in Section 4.19 related to Utilities and Service Systems found that impacts would be less than significant; therefore, while the project would contribute to localized or regional cumulative impacts, the project contribution would not be considerable.

Wildfire

The analysis provided in Section 4.20 related to Wildfire found that no impacts would result; therefore, no cumulative impacts related to this topic would occur.

c) Less than Significant Impact. The proposed project would not have environmental effects which would cause substantial adverse effects on humans, either directly or indirectly, as noted in the previous sections above.

AIR-1: During construction of the proposed project, the project contractor shall ensure all off-road diesel powered construction equipment of 50 horsepower or more used for the project is equipped with Level 3 diesel particulate filters or equivalent.

BIO-1: If vegetation removal is scheduled during the nesting season (typically February 1 to September 1), then a focused survey for active nests shall be conducted by a qualified biologist no more than five (5) days before the beginning of project-related activities (e.g., demolition, excavation, grading and vegetation removal). Surveys must be conducted in proposed work areas, staging and storage areas, and soil, equipment, and material stockpile areas. For passerines and small raptors, surveys must be conducted within a 250-foot radius surrounding the work area (in non-developed areas and where access is feasible). For larger raptors, such as those from the genus *Buteo*, the survey area must encompass a 500-foot radius. Surveys must be conducted by a qualified biologist during weather conditions suited to maximize the observation of possible nests and concentrate on areas of suitable habitat. If a lapse in project-related work of five days or longer occurs, an additional nest survey is required before work can be reinitiated. If nests are encountered during any preconstruction survey, a qualified biologist must determine if it may be feasible for construction to continue as planned without impacting the success of the nest, depending on conditions specific to each nest and the relative location and rate of construction activities. Any nest(s) within the project site shall be monitored by a qualified biologist during vegetation removal if work is occurring directly adjacent to the pre-determined no-work buffer. If the qualified biologist determines construction activities have potential to adversely affect a nest, the biologist will immediately inform the construction manager to halt construction activities within minimum exclusion buffer of 50 feet for songbird nests, and 200 to 500 feet for raptor nests, depending on species and location. Construction activities within the no-work buffer may proceed after a qualified biologist determines the nest is no longer active due to natural causes (e.g., young have fledged, predation or other non-anthropogenic nest failure).

CUL-1: In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, as detailed within TCR-1, regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.

CUL-2: If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to YSMN for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.

CUL-3: If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.

GEO-1: If paleontological materials are uncovered during grading or other earth moving activities, the contractor shall be required to halt work in the immediate area of the find, and to retain a professional paleontologist to examine the materials to determine whether it is a significant paleontological resource. If this determination is positive, the resource shall be left in place, if determined feasible by the project paleontologist. Otherwise, the scientifically consequential information shall be fully recovered by the paleontologist. Work may continue outside of the area of the find; however, no further work shall occur in the immediate location of the find until all information recovery has been completed and a report concerning it filed with the Community Development Director. The applicant shall bear the cost of implementing this mitigation.

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work associated with residual VOC concentrations is required (i.e., Mitigation Measure HAZ-3 is not required). If the post-remediation HHRA shows risk greater than 1:1,000,000 then the developer shall implement Mitigation Measure HAZ-3.

HAZ-3 **Vapor Intrusion Mitigation System (VIMS).** If the post-remediation HHRA outlined in HAZ-2 shows risk greater than 1:1,000,000, a passive sub-slab Vapor Intrusion Mitigation System (VIMS) shall be installed beneath the future warehouse building. The VIMS will generally consist of the following components (from bottom to top): (1) Gravel bed above the certified pad; (2) Horizontal perforated piping within the gravel bed to capture and convey residual vapors; (3) Spray-applied barrier above the gravel bed and below the building slab; and (4) Vertical risers to vent vapors to the atmosphere above the roof line.

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TCR-2 **Archaeological Documentation.** 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 YSMN. The Lead Agency and/or applicant shall, in good faith, consult with YSMN throughout the life of the project.

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6 References

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6.2 – Persons and Organizations Consulted

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ATTACHMENT “B2”

Historic Resources Assessment

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HISTORICAL/ARCHAEOLOGICAL RESOURCES SURVEY REPORT

ASSESSOR'S PARCEL NUMBERS 0292-192-11 AND -14

City of Redlands
San Bernardino County

For Submittal to:

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Michael Hogan, Principal Investigator

February 15, 2023
CRM TECH Contract No. 3963

Title: Historical/Archaeological Resources Survey Report: Assessor's Parcel Numbers 0292-192-11 and -14, City of Redlands, San Bernardino County, California

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USGS Quadrangle: Redlands, Calif., 7.5' quadrangle (Rancho San Bernardino land grant; T1S R3W, San Bernardino Baseline and Meridian)

Project Size: Approximately 11 acres

Keywords: Western Redlands area; eastern San Bernardino Valley; Phase I cultural resources survey; Site 3693-1H*: former La-Z-Boy plant at 301 Tennessee Street, ca. 1965; Site 3693-2H*: former Alex and Sadie Kimm residence at 360 Kansas Street, ca. 1950; Architect Leon Armantrout; no "historical resources" under CEQA provisions.

* *Temporary designations, pending assignment of permanent identification numbers*

EXECUTIVE SUMMARY

Between November 2022 and February 2023, at the request of MIG, Inc., CRM TECH performed a cultural resources study on approximately 11 acres of previously developed urban land in the western portion of the City of Redlands, San Bernardino County, California. The subject property of the study consists of Assessor's Parcel Numbers 0292-192-11 and 0292-192-14, located at the northwest corner of Tennessee Street and State Street, in a portion of the Rancho San Bernardino land grant lying within what would be the southeast quarter of Section 28, T1S R3W, San Bernardino Baseline and Meridian.

The study is part of the environmental review process for a proposed warehouse project that will require the demolition of the existing buildings on the property, including a former La-Z-Boy furniture manufacturing plant, a single-family residence, and several ancillary buildings. The City of Redlands, as the lead agency for the project, required the study in compliance with the California Environmental Quality Act (CEQA). The purpose of the study is to provide the City with the necessary information and analysis to determine whether the proposed project would cause substantial adverse changes to any "historical resources," as defined by CEQA, that may exist in or near the project area.

In order to identify such resources, CRM TECH conducted a historical/archaeological resources records search, initiated a Native American Sacred Lands File search, consulted with local historical organizations, pursued historical background research, and carried out an intensive-level field survey and field inspection of the buildings. The results of these research procedures indicate that the former La-Z-Boy furniture manufacturing plant dates to 1965 and operated at this location until 2019, while the residence was built around 1950.

Although both buildings have been expanded and altered, they retain sufficient historical characteristics to relate to their periods of origin and were therefore recorded into the California Historical Resources Inventory with the temporary designations of 3963-1H and -2H, pending assignment of permanent identification numbers. They do not, however, appear to be eligible for listing in the California Register of Historical Resources or for local designation by the City of Redlands. Therefore, they do not constitute "historical resources" for CEQA-compliance purposes.

No other potential "historical resources" were encountered within or adjacent to the project area. However, the State of California Native American Heritage Commission stated that the Sacred Lands File maintained by the commission indicated the presence of unspecified Native American cultural resource(s) in the general vicinity of the project location and referred further inquiry to the local Native American tribes. According to CEQA guidelines, the identification of potential "tribal cultural resources" is beyond the scope of this study and needs to be addressed through government-to-government consultations between the City of Redlands and the pertinent Native American groups pursuant to Assembly Bill (AB) 52.

Based on these findings, CRM TECH recommends to the City of Redlands a tentative conclusion of *No Impact* on cultural resources, pending completion of the AB 52 consultation process. No additional cultural resources investigation is recommended for the project unless development plans undergo such changes as include areas not covered by this study. However, if buried cultural materials are encountered during any earth-moving operations associated with the project, all work within 50 feet of the discovery should be halted or diverted until a qualified archaeologist can evaluate the nature and significance of the finds.

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INTRODUCTION

Between November 2022 and February 2023, at the request of MIG, Inc., CRM TECH performed a cultural resources study on approximately 11 acres of previously developed urban land in the western portion of the City of Redlands, San Bernardino County, California (Fig. 1). The subject property of the study consists of Assessor's Parcel Numbers (APN) 0292-192-11 and 0292-192-14, located at the northwest corner of Tennessee Street and State Street, in a portion of the Rancho San Bernardino land grant lying within what would be the southeast quarter of Section 28, T1S R3W, San Bernardino Baseline and Meridian (Figs. 2, 3).

The study is part of the environmental review process for a proposed warehouse project that will require the demolition of the existing buildings on the property, including a former La-Z-Boy furniture manufacturing plant, a single-family residence, and several ancillary buildings. The City of Redlands, as the lead agency for the project, required the study in compliance with the California Environmental Quality Act (CEQA; PRC §21000, et seq.). The purpose of the study is to provide the City with the necessary information and analysis to determine whether the proposed project would cause substantial adverse changes to any "historical resources," as defined by CEQA, that may exist in or near the project area.

In order to identify such resources, CRM TECH conducted a historical/archaeological resources records search, initiated a Native American Sacred Lands File search, consulted with local historical organizations, pursued historical background research, and carried out an intensive-level field survey and field inspection of the buildings. The following report is a complete account of the methods, results, and conclusion of the study. The qualifications of personnel who participated in the study are presented in Appendix 1.

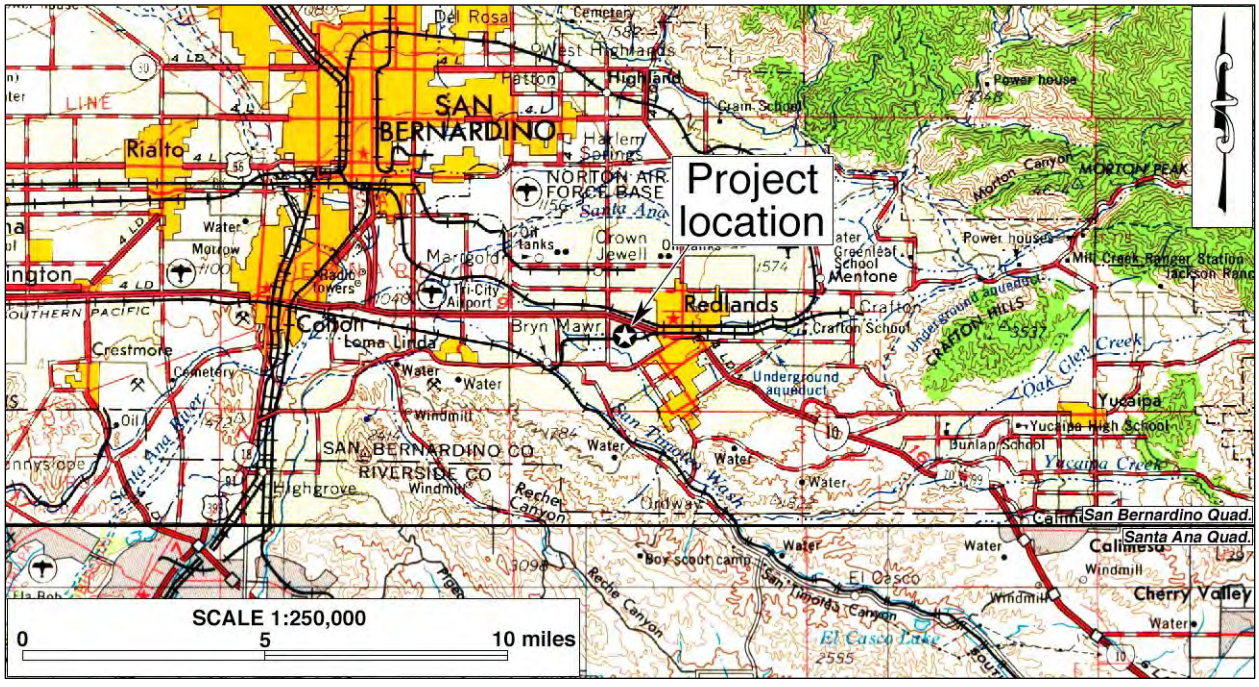


Figure 1. Project vicinity. (Based on USGS San Bernardino and Santa Ana, Calif., 120'x60' quadrangles [USGS 1969; 1979])

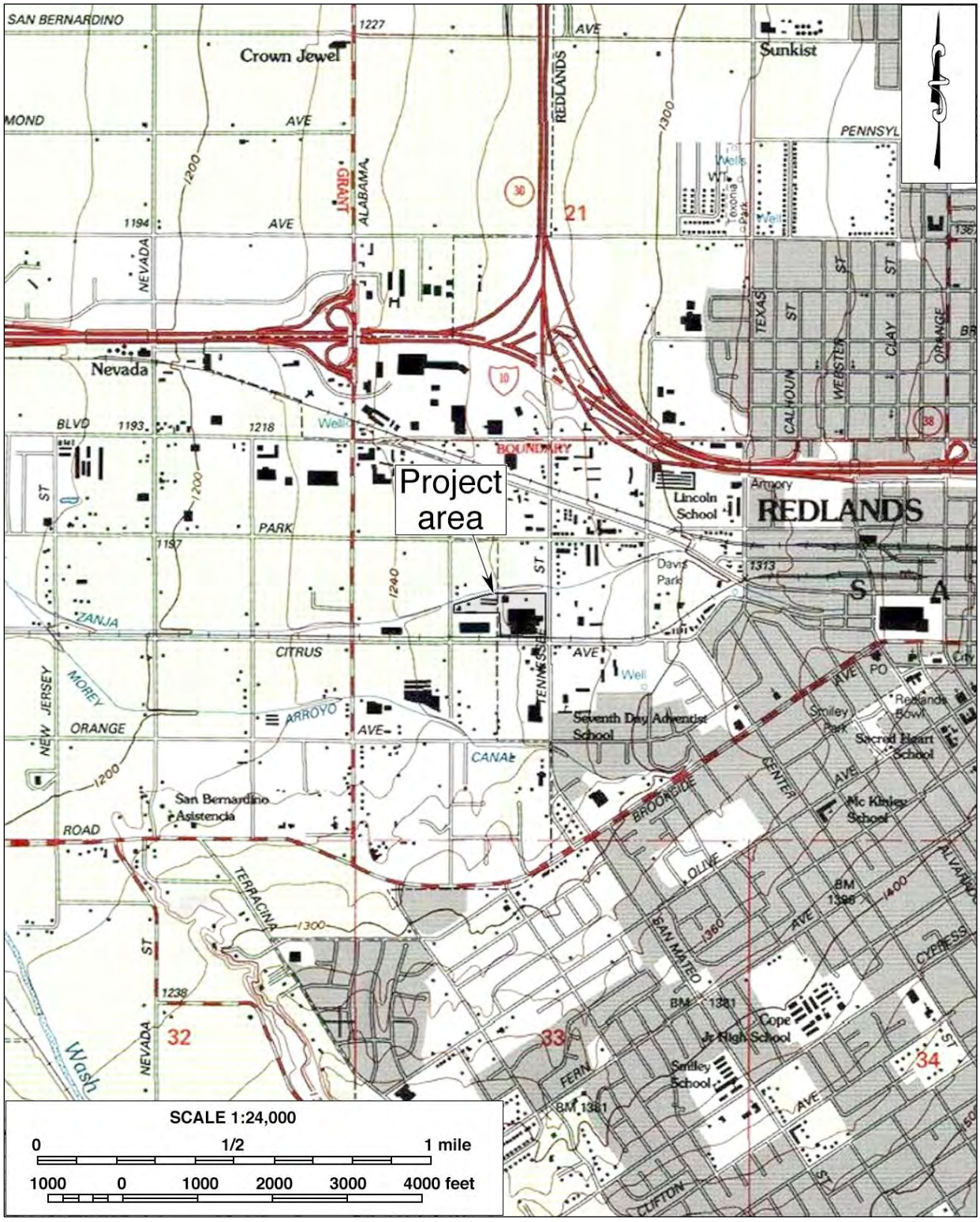


Figure 2. Location and configuration of the project area. (Based on USGS Redlands, Calif., 7.5' quadrangle [USGS 1996])



Figure 3. Recent satellite image of the project area. (Based on Google Earth imagery)

SETTING

CURRENT NATURAL SETTING

The City of Redlands is situated in the eastern San Bernardino Valley, a broad inland valley bound by the San Gabriel and San Bernardino mountain ranges on the north and a series of low rocky hills on the south. Geologically, the San Bernardino Valley lies on the northern rim of the Peninsular Ranges geomorphic province, adjacent to the Transverse Ranges province. The natural environment of the region is characterized by its temperate Mediterranean climate. Precipitation is typically less than 20 inches annually, falling mostly between November and April.

The approximately 11-acre project area is an irregularly shaped tract of commercial property bounded on the east by Tennessee Street, on the south by State Street, on the west by Kansas Street, and on the north by the "Mission Zanja," a drainage channel bearing a name that often causes confusion with the historic Mill Creek Zanja further to the south. The main building of the former La-Z-Boy furniture manufacturing plant and two associated smaller buildings occupy the eastern two-thirds of the property, and the modest single-family residence stands in the western portion along Kansas Street (Figs. 4, 5). The surrounding properties are primarily commercial in character.

Elevations in the project area range approximately from 1,245 feet to 1,260 feet above mean sea level over relatively level terrain. Vegetation consists mostly of introduced species, such as eucalyptus trees and a string of lemon trees along part of the northern border and landscaping plants near the buildings, including pomegranate and gum trees around the residence, along with various small grasses and shrubs. Surface soils over most of the project area consist of medium brown, fine- to medium-grained sands.



Figure 4. Western portion of the project area (APN 0292-192-14). (Photograph taken November 17, 2022; view to the west).



Figure 5. Eastern portion of the project area (APN 0292-192-11). (Photograph taken November 17, 2022; view to the south)

CULTURAL SETTING

Prehistoric Context

The earliest evidence of human occupation in inland southern California was discovered below the surface of an alluvial fan in the northern Lakeview Mountains overlooking the San Jacinto Valley, with radiocarbon dates clustering around 9,500 B.P. (Horne and McDougall 2008). Another site found near the shoreline of Lake Elsinore, close to the confluence of Temescal Wash and the San Jacinto River, yielded radiocarbon dates between 8,000 and 9,000 B.P. (Grenda 1997). Additional sites with isolated Archaic dart points, bifaces, and other associated lithic artifacts from the same age range have been found in the nearby Cajon Pass area, typically atop knolls with good viewsheds (Basgall and True 1985; Goodman and McDonald 2001; Goodman 2002; Milburn et al. 2008).

The cultural history of southern California has been summarized into numerous chronologies, including work by Chartkoff and Chartkoff (1984), Warren (1984), and others. The prehistory of Riverside County specifically has been addressed by O'Connell et al. (1974), McDonald, et al. (1987), Keller and McCarthy (1989), Grenda (1993), Goldberg (2001), and Horne and McDougall (2008). Although the beginning and ending dates of different cultural horizons vary regionally, the general prehistory framework for inland southern California can be divided into three periods:

- Paleoindian Period (ca. 18,000-9,000 B.P.): Native people of this period created fluted spearhead bases designed to be hafted to wooden shafts. The distinctive method of thinning bifaces and spearhead preforms by removing long, linear flakes leave diagnostic Paleoindian markers at tool-making sites. Other artifacts associated with the Paleoindian toolkit include choppers, cutting tools, retouched flakes, and perforators. Sites from this period are sparse across the landscape and most are deeply buried.

- Archaic Period (ca. 9,000-1,500 B.P.): Archaic sites are characterized by abundant lithic scatters of considerable size with many biface thinning flakes, bifacial preforms broken during manufacture, and well-made groundstone bowls and basin metates. As a product of making dart points, many biface thinning waste flakes were generated at individual production stations, which is a diagnostic feature of Archaic sites.
- Late Prehistoric Period (ca. 1,500 B.P.-contact): Sites from this period typically contain small lithic scatters from the manufacture of small arrow points, expedient groundstone tools such as tabular metates and unshaped manos, wooden mortars with stone pestles, acorn or mesquite bean granaries, ceramic vessels, shell beads suggestive of extensive trading networks, and steatite implements such as pipes and arrow shaft straighteners.

Ethnohistoric Context

The Redlands area lies in the traditional homeland of the Serrano Indians, although the Native population at the time of European contact are believed to have been Gabrielino from the San Gabriel Valley, who were later succeeded by a Mountain Cahuilla group from the San Jacinto and Santa Rosa Mountains around 1846 (Strong 1929:8). Serrano ancestral territory is centered in the San Bernardino Mountains, but also includes a portion of the San Bernardino Valley and the southern rim of the Mojave Desert, extending from today's Victorville eastward to Twentynine Palms. "Serrano" derives from a Spanish term meaning "mountaineer" or "highlander." The basic written sources on Serrano culture are Kroeber (1925), Strong (1929), and Bean and Smith (1978).

Prior to European contact, Serrano were primarily hunters and gatherers and occasional fishers, who settled near where flowing water emerged from the mountains. They were loosely organized into exogamous clans led by hereditary heads, and the clans in turn were affiliated with one of two exogamous moieties. The exact nature of the clans, their structure, function, and number are not known, except that each clan was the largest autonomous political and landholding unit, the core of which was the patrilineage. There was no pan-tribal political union among the clans. Despite their linguistic differences, Serrano, Gabrielino and Cahuilla societies shared many characteristics in social organization and material culture.

Although contact with Europeans may have occurred as early as 1771 or 1772, Spanish influence on Serrano lifeways was minimal until the 1810s, when a mission *asistencia* was established in the vicinity of present-day Redlands. Between then and the end of the mission era in 1834, most of the Serrano in the western portion of their traditional territory were removed to the nearby missions. In the eastern portion, a series of punitive expeditions in 1866-1870 resulted in the death or displacement of almost all remaining Serrano population in the San Bernardino Mountains. Today, most Serrano descendants are affiliated with the Yuhaaviatam of San Manuel Nation (formerly known as the San Manuel Band of Mission Indians), the Morongo Band of Mission Indians, or the Serrano Nation of Indians.

Historic Context

The San Bernardino Valley, including the Redlands area, received its first European visitors in 1771, when a small force of Spanish soldiers traveled through the area under the command of Pedro Fages, the military *comandante* of Alta California (Beck and Haase 1974:15). After the establishment of Mission San Gabriel that year, the San Bernardino Valley nominally became a part of the vast

landholdings of that mission. The name "San Bernardino" was bestowed on the valley when the San Bernardino *Asistencia*, along with a mission rancho bearing the same name, was officially established in 1819, originally on the north side of present-day Mission Road in nearby Loma Linda (Lerch and Haenszel 1981).

Historically, the project area was located on the periphery of "Old San Bernardino," the site of the earliest non-Native settlement in the eastern San Bernardino Valley. It was centered around the adobe storehouse of Rancho San Bernardino and extended from the easternmost portion of Loma Linda to the westernmost portion of Redlands (Hall 1888). In 1842, after secularization of the mission system, the Mexican authorities in Alta California granted Rancho San Bernardino, along with several other adjacent former mission ranchos, to members of a prominent Los Angeles family, the Lugos (Schuiling 1984:34). After nine years of cattle raising on their 35,000-acre domain, the Lugo family sold the entire rancho in 1851 to Amasa M. Lyman and Charles C. Rich, leaders of a Mormon colony that was to become today's City of San Bernardino (*ibid.*:45).

In the early 1880s, Frank E. Brown and Edward G. Judson purchased a portion of the rancho and combined it with other land acquisitions to form the town of Redlands (Schuiling 1984:86). To ensure a reliable water supply for the new colony, in 1883-1884 Brown and Judson constructed the Bear Valley Reservoir in the San Bernardino Mountains for the exclusive use of Redlands settlers (*ibid.*). Amid the great southern California land boom of the 1880s and the thriving citrus industry, the Redlands colony incorporated in 1888 and soon became the best-known winter retreat in the nation (*ibid.*:87). An influx of winter residents from the eastern United States perpetuated Redlands' image as an affluent city characterized by vast citrus groves surrounding elegant mansions of gentlemen farmers.

In the mid-20th century, and particularly after World War II, the expansive citrus groves increasingly gave way urban expansion and increasing diversification of Redlands' economic interests. After U.S. Highway 99 (Redlands Boulevard) was realigned in 1946, commercial development that was previously concentrated in the historic downtown area began to muster along the new route toward the western city limit, and then to the north after Interstate Highway 10 was completed in 1962 (ARG 2017:145, 148). Over the last few decades of the 20th century, like many other former small rural towns in southern California, Redlands increasingly took on the characteristics of a "bedroom community." Nevertheless, the citrus culture that developed during the late 19th and early 20th centuries continues to be an integral part of the City's identity.

RESEARCH METHODS

RECORDS SEARCH

On December 7, 2022, CRM TECH archaeologist Nina Gallardo conducted the records search at the South Central Coastal Information Center (SCCIC), California State University, Fullerton, which is the State of California's official cultural resource records repository for San Bernardino County. During the records search, Gallardo examined maps, records, and electronic databases at the SCCIC for previously identified cultural resources and existing studies within a one-mile radius of the project area. Previously identified cultural resources include properties designated as California

Historical Landmarks, Points of Historical Interest, or San Bernardino County Historical Landmarks, as well as those listed in the National Register of Historic Places, the California Register of Historical Resources, or the California Historical Resources Inventory.

SACRED LANDS FILE SEARCH

On November 4, 2022, CRM TECH submitted a written request to the State of California Native American Heritage Commission (NAHC) for a records search in the commission's Sacred Lands File. The NAHC is the State of California's trustee agency for the protection of tribal cultural resources as defined by California Public Resources Code §21074 and is tasked with identifying and cataloging properties of Native American cultural value throughout the state, including places of special religious, spiritual, or social significance and known graves and cemeteries. The NAHC's reply is summarized below and attached to this report in Appendix 2.

LOCAL COMMUNITY CONSULTATION

As a part of the research procedures, the Redlands Historical Museum Association and the Redlands Area Historical Society were contacted for supplementary information on the history of the subject property and for local community input regarding potential historic interest in any of the buildings on the property. The contact was initiated by e-mail on January 4, 2023, and included a map showing the project location and photographs of the historic-era buildings identified on the property. A follow-up e-mail was sent on January 14. To date, no reply has been received from either group.

HISTORICAL RESEARCH

Historical research for this study was completed in two phases. The preliminary background research was conducted by CRM TECH historian Terri Jacquemain on the basis of published literature in local and regional history, U.S. General Land Office (GLO) land survey plat maps dated 1858, U.S. Geological Survey (USGS) topographic maps dated 1901-1996, and aerial/satellite photographs taken in 1938-2022. The historic maps are available at the websites of the U.S. Bureau of Land Management and the USGS. The aerial and satellite images are available through the Google Earth software, at the Nationwide Environmental Title Research (NETR) Online website, and at the FrameFinder Online website hosted by the University of California, Santa Barbara.

After the identification of historic-era buildings in the project area, Jacquemain pursued more specific and in-depth research on the history of these buildings. Sources consulted during this phase of the research included primarily the archival records of the City of Redlands and the County of San Bernardino, particularly building safety records and real property assessment records, materials on file at the A.K. Smiley Public Library, and various online genealogical and commercial business databases.

FIELD SURVEY

On November 17, 2022, CRM TECH archaeologists Hunter O'Donnell and Cynthia Ayala conducted the intensive-level field survey of the project area by walking parallel north-south transects spaced 15 meters (approximately 50 feet) apart across all open areas on the property. In this way, the ground surface in the entire project area was carefully examined for any evidence of

human activities dating to the prehistoric or historic period (i.e., 50 years or older). While most of the project area is paved or occupied by buildings, ground visibility was good to excellent (85-90%) over the rest of the property except for a few pockets of excessive duff under trees and clusters of vegetation along the peripheries.

In conjunction with the archaeological survey, O'Donnell carried out a field inspection of the buildings and other built-environment features in the project area and field recordation on those that appeared to be more than 45 years old and retained at least a recognizable level of historical characteristics. The field recordation consisted mainly of detailed notations and preliminary photo-documentation of the structural and architectural characteristics and current conditions. The field data and observations were compiled into standard record forms for submittal to the California Historical Resources Inventory (see App. 3).

RESULTS AND FINDINGS

RECORDS SEARCH

According to SCCIC records, the project area had not been surveyed for cultural resources prior to this study, and no cultural resources had been recorded on the property. Within the one-mile scope of the records search, some 75 cultural resources studies completed between 1973 and 2015 have been reported to the SCCIC (Fig. 6). Most of these studies were clustered to the west of Alabama Street, attesting to the increased development activities on former citrus land in the Old San Bernardino area since CEQA mandates were implemented in the 1970s. To the east of the project area, a number of small-scale studies have occurred near the City's downtown core.

As a result of the past survey efforts, some 179 historical/archaeological sites of historical origin were previously recorded within the one-mile radius. Closest to the project area among them, along State Street adjacent to the southern property boundary, was Site 36-027672, the former alignment of the 1888 San Bernardino and Redlands Railroad Company motor line, also known as the Redlands Central Railway or the "Redlands Dinky." The 10-mile-long narrow-gauge rail line linked the two cities, with passenger fares costing 30¢ one-way and 50¢ for a round trip (Landis n.d.). As is the case with many early infrastructure features, Site 36-027672 exists only on paper today.

Other sites recorded within the one-mile radius include well-known local historical landmarks such as the Mill Creek Zanja, the reconstructed San Bernardino *Asistencia*, and the Bryn Mawr Townsite, but the majority of the sites consists of buildings, including many in the City's designated historic districts, along with structural foundations, roads, and refuse scatters. Other than the no-longer-extant 36-027672, none of the sites were recorded in the immediate vicinity of the project area. As such, they require no further consideration during this study. No cultural resources of prehistoric—i.e., Native American—origin have been identified within the scope of the records search.

SACRED LANDS FILE SEARCH

In response to CRM TECH's inquiry, the NAHC reported in a letter dated December 8, 2022, that the Sacred Lands File indicated the presence of Native American cultural resource(s) in the general vicinity of the project location, but the nature and location of the resource(s) were not disclosed.

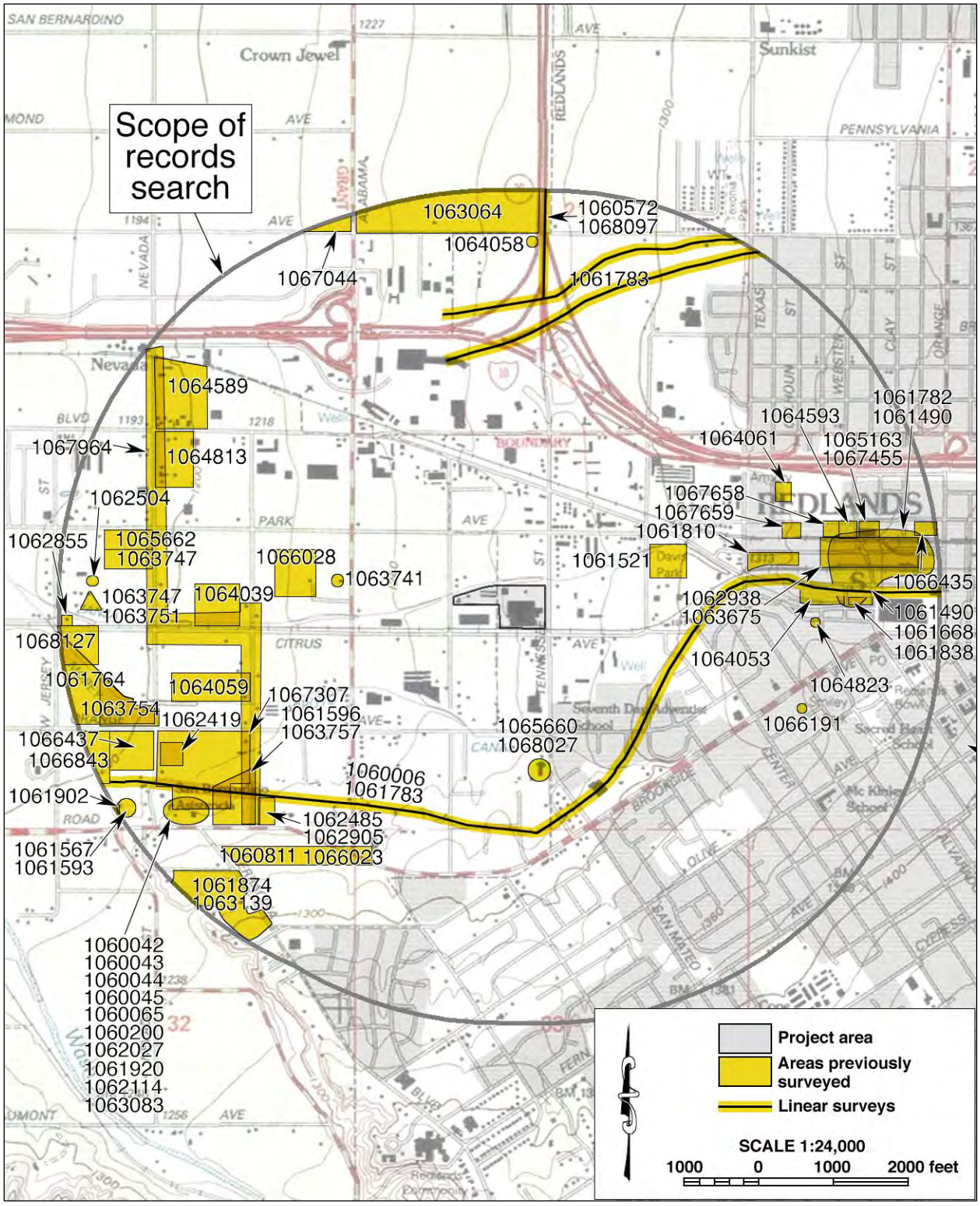


Figure 6. Previous cultural resources studies in the vicinity of the project area. Locations of historical/archaeological resources are not shown as a protective measure.

The NAHC recommended that local Native American groups be consulted for further information and provided a referral list of 11 tribal representatives affiliated with 10 local Native American groups. The NAHC's reply is attached to this report in Appendix 3 for reference by the City of Redlands in future government-to-government consultations with the local Native American groups.

HISTORICAL RESEARCH

The project area is situated about a mile east-northeast of Old San Bernardino, the center of early settlement during the Mission, Rancho, and Mormon periods in the history of San Bernardino Valley, but historical sources consulted for this study yielded no indication that it was involved in any of these early developments, except perhaps as farmland (Figs. 7-10). In the late 19th century, the project area sat in a flood-prone area near the confluence of what are now the Mission Zanja and the Morey Arroyo, amid a regular grid of roads, with the "Dinky" line (Site 36-027672) running along its southern boundary (Fig. 8).

By the late 1930s the project area and nearly all of the surrounding properties were covered by citrus groves, and a building, presumably a farmstead, had appeared near the southeast corner of the project area, as early channelization efforts along the Mission Zanja and the Morey Arroyo facilitated growth in the vicinity (NETR Online 1938; Fig. 9). The Mission Zanja connects to the original Mill Creek Zanja to the east of downtown Redlands near Laramie Park, but it was not a part of the historically significant irrigation canal, which was built in 1819-1820, the first irrigation work completed in San Bernardino County (Beattie 1951:42; Haenszel and Reynolds 1975:10). The 12-mile course of the Mill Creek Zanja ran roughly a half-mile south of the project location at its closest point.

After World War II, land in this area remained predominantly devoted to citrus groves and outside the boundary of the City of Redlands, which in 1959 was at Tennessee Street (UCSB FrameFinder 1952; NETR Online 1959-1968; Fig. 10). In the 1960s, the City's master plan codified land annexation further west, and earmarked it for industrial growth away from the core area (ARG 2017:149). The industrial district was bounded roughly by Redlands Boulevard/Colton Avenue, Tennessee Street, Orange Avenue, and New Jersey Street. Among the earlier industrial enterprises near the project location at the time were a textile knitting factory, a Gill Battery manufacturing plant, and a lumber and wrecking yard (ARG 2017:148, 149). Over the next three decades, industrial development continued to usurp the groves, often replacing them with large industrial buildings of concrete tilt-up construction and designed for truck access and freight distribution. By 1980 most of the citrus land had been laid fallow or replaced by commercial and industrial development, a trend that has continued to the present (NETR Online 1980-2020; Google Earth 1994-2022).

The residence at 360 Kansas Street was built around 1950, accompanied by a long rectangular structure at the rear, or the east (UCSB FrameFinder 1952; NETR Online 1959; County Assessor n.d.). A similar building combination had also appeared on Kansas Street just north of the Mission Zanja (*ibid.*). In 1954, the residence was occupied by Alex and Sadie Kimm, whose address was listed on Kansas Street and "one block north of Citrus" (now State Street; Ancestry.com n.d.). Family members John and Mary Jean Kimm lived on Kansas Street "two blocks north of Citrus" (*ibid.*), possibly in the similar residence across the drainage.

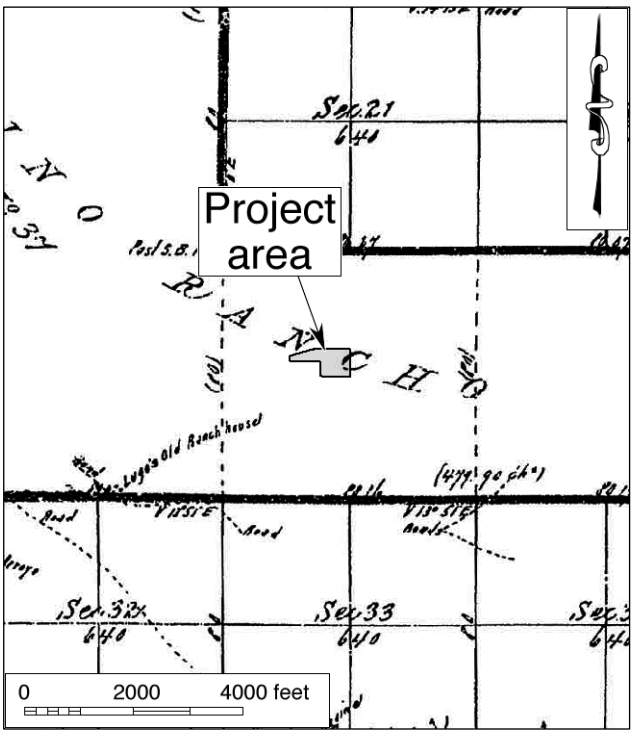


Figure 7. The project area and vicinity in 1853-1857. (Source: GLO 1858)

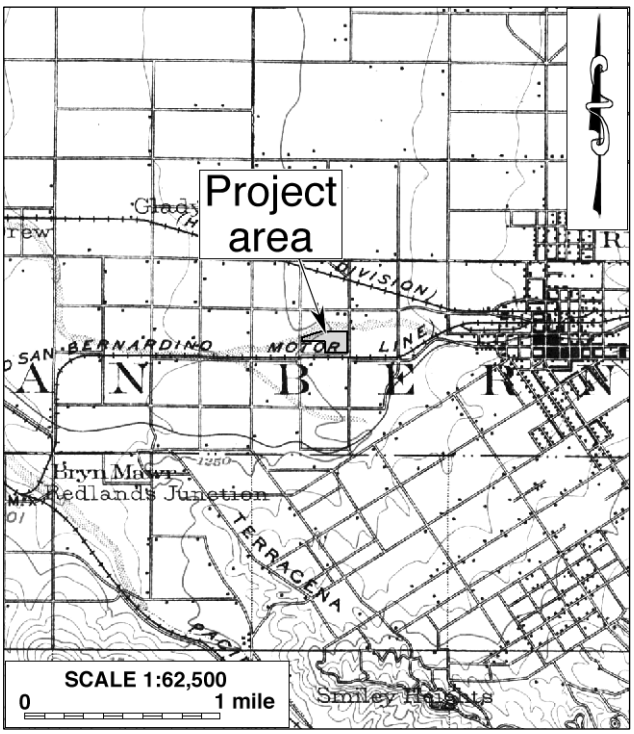


Figure 8. The project area and vicinity in 1898-1899. (Source: USGS 1901)

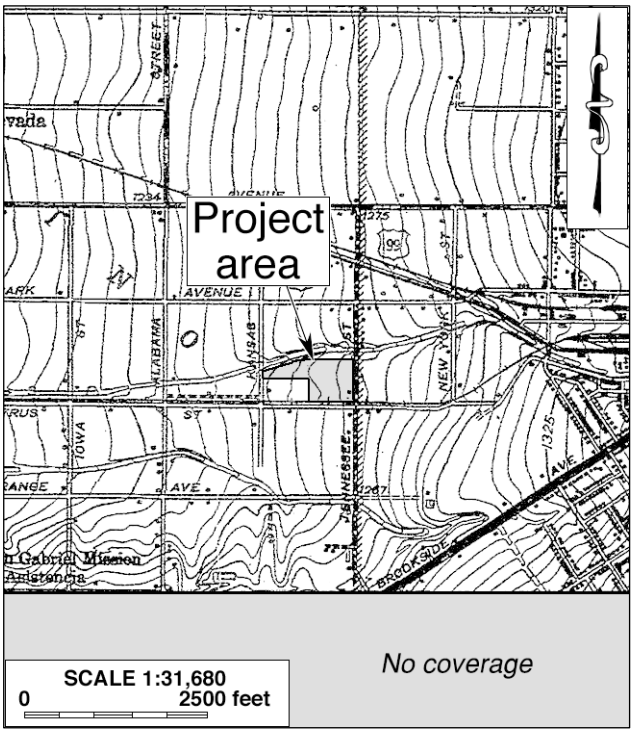


Figure 9. The project area and vicinity in 1939. (Source: USGS 1943)

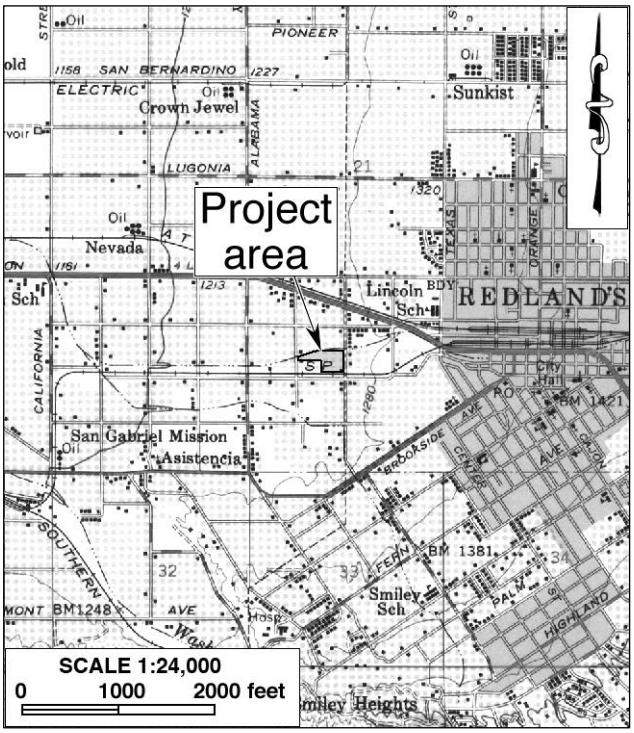


Figure 10. The project area and vicinity in 1952. (Source: USGS 1954)

Lead by patriarch Harkel A. Kimm and his wife Anna, who in 1954 lived on Alabama Street north of Barton Road, the Kimm family were in the business of chicken ranching (Ancestry.com n.d.). Harkel and Anna Kimm were both born in the Netherlands and had journeyed to Montana by 1919 when their youngest son Alex was born (*ibid.*). By 1940, they had settled in Redlands (*ibid.*). The elder Kimms were among some 400,000 Dutch immigrants who came to the U.S. between 1845 and 1930, with enough eventually settling in the Redlands area to form a small but cohesive community based primarily on their Christian Reformed faith and the dairy industry (ARG 2017:208). Alex and Sadie Kimm remained property owners in the project area until 1995, when the land was deeded to Rettig Machine Shop. City building safety records indicate the building suffered fire damage in 1982 (City of Redlands 1982).

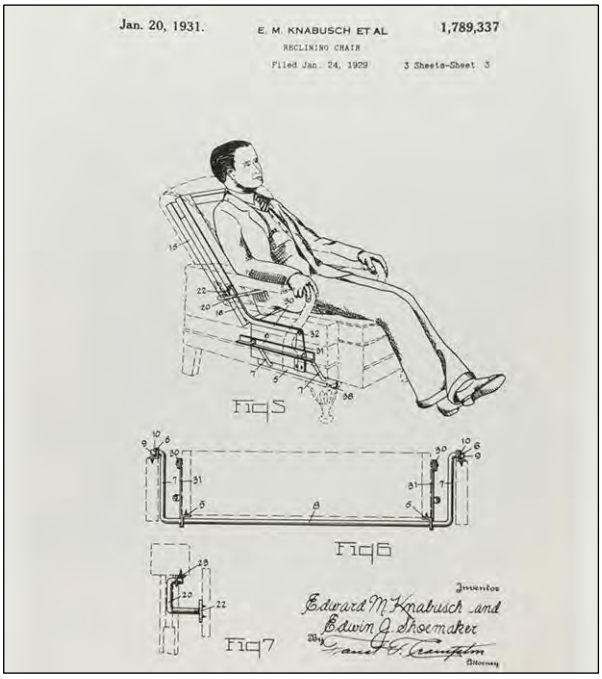


Figure 11. Patent illustration for the original La-Z-Boy Reclining Chair, January 24, 1929. (Source: The Henry Ford n.d.)

The former La-Z-Boy furniture manufacturing plant at 301 Tennessee was built for the company in 1965 and served in that capacity until October 2019, when the plant was closed (City of Redlands 1965; Kibby 1965:1; Iyer 2019). The company was founded in 1927 by cousins Edwin J. Shoemaker and Edward M. Knabusch, who produced their first chair in a garage in Monroe, Michigan (La-Z-Boy n.d.). It was a simple wood-slat chair, but with an innovative mechanism that allowed the occupant to recline (*ibid*.).

As they sought to bring their chair to the market, it was suggested that they upholster it for indoor use (La-Z-Boy n.d.). The duo took the advice and then filed for a patent in 1929 (La-Z-Boy n.d.; Fig. 11). Eventually the furniture line was expanded to encompasses other brands and living room staples such as sofas and loveseats, and the company was incorporated in 1941 (La-Z-Boy.com n.d.). In March 1972, La-Z-Boy went public, having by then established nine manufacturing plants in the United States: two in Michigan, one in Redlands, and six more in several eastern states (Encyclopedia.com n.d.). Today, La-Z-Boy is an internationally recognized brand and is among the leading residential furniture producers worldwide, with its headquarters still in Monroe, Michigan (*ibid*.).

During its 54-year tenure at the Redlands location, La-Z-Boy employed as many as 350 workers, who made and upholstered the company's flagship recliner and other branded products, accounting for about 10% of the company's output (Iyer 2019; Slaughter 2019). The plant was the company's first west of the Mississippi, built after Redlands' civic agencies vied to be the choice among eight contenders. Efforts included hosting La-Z-Boy co-founder Edward Knabusch and his wife at the residence of then-mayor Waldo Burroughs, followed up by city representatives paying a one-day visit to the company headquarters in Michigan (Kibby 1965:1). The company was active in the

Redlands community as a sponsor of the annual Redlands Bowl Summer Music Festival, and in 2011 became the City of Redlands' first recipient of the Mayor's Green Action Award for reducing its landfill waste from manufacturing (Iyer 2019).

The 1960s-1970s industrial buildings constructed in the western Redlands industrial district were commonly plain box-like buildings, but some owners of the era opted to contract stylized primary facades for their buildings, including the Lazy-Z-Boy furniture manufacturing plant, which was designed by Redlands architect Leon H. Armantrout (City of Redlands 1965; ARG 2017:149). Armantrout moved to Redlands in 1960 and opened his office there in 1964 (Johnson 2002). He has built an impressive body of work in Mid-Century Modern and Late Modern styles, including many custom homes and eye-catching institutional, professional, commercial, educational, and religious buildings (*ibid.*). In 2013, Armantrout donated a catalog of his Redlands architectural drawings to the A.K. Smiley Public Library (Schwartz 2013), among them those for the First United Methodist Church, the relocation and expansion of the ESRI campus, Redlands Community Center, Town Square Design for Redlands Mall, Empire Bowl, Redlands Medical Center, and the San Bernardino County Museum.

Constructed by local contractors Forsberg and Gregory, Inc., the La-Z-Boy building was originally a 72,000-square-foot manufacturing plant (City of Redlands 1965). In 1972-1973, 43,600 square feet were added to the factory and 800 square feet to the front office, followed by a 624-square-foot tilt-up panel addition and another 9,225 square feet in 1991 (City of Redlands 1972-1991). The two ancillary buildings to the north of the main plant, measuring 12,000 and 28,000 square feet, are both concrete tilt-up structures erected in 1969, again by Forsberg and Gregory, Inc., but with no architect identified in the building permits (City of Redlands 1969). A 1,300-square-foot conference room was added in 2004, and the monument sign along Tennessee Street was installed in 2014 (City of Redlands 2004-2014).

FIELD SURVEY

Field observations confirm that no vestige of Site 36-027672, the Redlands Dinky line, exists in the vicinity of the project area, and no evidence of any prehistoric cultural resources was encountered within or adjacent to the project boundaries. The ground surface has been extensively disturbed by agricultural operations and construction activities in the past, leaving little potential for any prehistoric or early historic archaeological remains to survive intact.

The three streets adjacent to the project area, Tennessee Street, Kansas Street, and State Street, all date to the historic period, but their current configuration and appearance reflect the results of repeated upgrading and regular maintenance in recent times, and none of them exhibits any distinctively historical characteristics. As working components of the modern transportation infrastructure, these streets are not considered potential "historical resources." Similarly, the Mission Zanja adjacent to the northern project boundary is an unremarkable earthen drainage of common design and construction practices that has been constantly maintained in the modern era. With no anticipated impacts from the project as proposed, it requires no further consideration during this study.

Historical research has revealed that the La-Z-Boy plant and residence on the property are both more than 50 years of age. While both have been significantly altered, field survey observations confirm that they retain a recognizable level of historical characteristics. As such, they were recorded into the California Historical Resources Inventory during this study and designated temporarily as Sites 3963-1H and -2H, pending assignment of permanent identification numbers by the SCCIC. These buildings represent the only potential "historical resources" in the project area.

Site 3963-1H (Former La-Z-Boy Plant)

The former La-Z-Boy manufacturing plant at 301 Tennessee Street consists of a main office/ warehouse building and two smaller auxiliary buildings of concrete tilt-up construction situated to the north, all of them resting on concrete slab foundations with flat roofs (Fig. 12). The main building is a tall one-story steel-frame and concrete structure that covers nearly two acres. Its squarish shape is a product of later additions that effectively doubled the original footprint, while some of the additions resulted in protrusions from the building. The concrete cladding covers nearly all of the exterior, leaving the building relatively blind but punctuated by loading docks with roll-up doors or single entries filled with metal commercial doors.

The rectangular front office portion on the eastern side, facing Tennessee Street, has a flat but lower roof, with its Armantrout-designed Modern-style elements somewhat overshadowed by the sizable unadorned additions at either end. Nevertheless, the Modern style remains apparent in the deeply recessed main entry between slightly over-extended brick partitions sheltering a plateglass wall and a metal-framed glass door with a transom. Varnished pine wood slats cover the entry ceiling, while square cut-outs in the brick sides allow a view of low-growing tropical plant gardens that flank the entry. A steel-framed enclosure reaching the roof level is filled on the top two-thirds by smoke glass, and open at the bottom. The entry is accessed by a brick-edged pebbled concrete walkway, flanked by low planters and paved parking lots and driveway.



Figure 12. Former La-Z-Boy furniture manufacturing plant at 301 Tennessee Street. (Photograph taken on February 14, 2023; view to the northwest)



Figure 13. Single-family residence at 360 Kansas Street. (Photograph taken on November 17, 2022; view to the northwest)

Site 3963-2H (Former Kimm Residence)

Located at 360 Kansas Street, this Ranch-style, one-story single-family residence with an attached garage is a wood-framed structure built on a U-shaped plan. It rests on a concrete foundation and is surmounted by a medium-pitched hip roof sheathed in brown composition shingles (Fig. 13). An addition with a shed roof is attached to the eastern (rear) side at the middle section. Light-colored stucco clads most of the exterior, although there are small half-wall sections of brick-and-mortar and vertical tooth-and-groove wood siding on the rear addition. Fenestration is a mix of vintage and recent windows of various size, as are the sashes adorning the entry doors. A modern metal roll-up door fills the entry to the garage, which is topped by a cupola at the roof ridge. Two corrugated-metal sheds accompany the house in the rear.

DISCUSSION

APPLICABLE REGULATORY FRAMEWORK

The purpose of this study is to identify any cultural resources in the project area and to assist the City of Redlands in determining whether they meet the official definition of "historical resources," as provided in the California Public Resources Code, in particular CEQA. According to PRC §5020.1(j), "'historical resource' includes, but is not limited to, any object, building, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California."

More specifically, CEQA guidelines state that the term "historical resources" applies to any such resources listed in or determined to be eligible for listing in the California Register of Historical Resources, included in a local register of historical resources, or determined to be historically significant by the lead agency (Title 14 CCR §15064.5(a)(1)-(3)). Regarding the proper criteria for

the evaluation of historical significance, CEQA guidelines mandate that "generally a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing on the California Register of Historical Resources" (Title 14 CCR §15064.5(a)(3)). A resource may be listed in the California Register if it meets any of the following criteria:

(1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
(2) Is associated with the lives of persons important in our past.
(3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
(4) Has yielded, or may be likely to yield, information important in prehistory or history. (PRC §5024.1(c))

A local register of historical resources, as defined by PRC §5020.1(k), "means a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution." For individual properties and historic districts in the City of Redlands, the City's Historic and Scenic Preservation Ordinance outlines a series of 11 eligibility criteria, any one of which may render a property eligible for designation by the City of Redlands as a "landmark" or a "historic property":

A. It has significant character, interest, or value as part of the development, heritage or cultural characteristics of the city of Redlands, state of California, or the United States;
B. It is the site of a significant historic event;
C. It is strongly identified with a person or persons who significantly contributed to the culture, history or development of the city;
D. It is one of the few remaining examples in the city possessing distinguishing characteristics of an architectural type or specimen;
E. It is a notable work of an architect or master builder whose individual work has significantly influenced the development of the city;
F. It embodies elements of architectural design, detail, materials, or craftsmanship that represents a significant architectural innovation;
G. It has a unique location or singular physical characteristics representing an established and familiar visual feature of a neighborhood, community, or the city;
H. It has unique design or detailing;
I. It is a particularly good example of a period or style;
J. It contributes to the historical or scenic heritage or historical or scenic properties of the city (to include, but not be limited to, landscaping, light standards, trees, curbings, and signs);
K. It is located within a historic and scenic or urban conservation district, being a geographically definable area possessing a concentration of historic or scenic properties which contribute to each other and are unified aesthetically by plan or physical development. (MC §2.62.170)

RESOURCE EVALUATIONS

Site 3963-1H (Former La-Z-Boy Plant)

The former La-Z-Boy furniture manufacturing plant at 301 Tennessee Street was built in 1965 and is among several industrial buildings constructed in the vicinity during the 1960s-1970s period, in the early days of the development of an industrial district in the western portion of the City of Redlands. Its construction reflected the City's increasing efforts to diversify its economic base in the post-

World War II era. At the time, the La-Z-Boy Company was already prominent in the industry and was pursuing a multi-state expansion. The building is arguably associated with a pattern of events or a local historical theme, namely Redlands' transition away from its horticulture roots, and is also notable for its association to an innovative, industry-leading company. In neither case, however, does the building demonstrate a particularly important or close association in comparison to other properties known for similar associations.

To wit, the historical theme of mid-20th century industrial growth is well-represented by industrial and commercial enterprises of similar vintage throughout the Redland area, particularly the western portion of the city, and furniture manufacturing was not a dominant industry in the area or a particularly prominent element of the local economy. In regard to the association to the La-Z-Boy Company, although hailed as being the "first west of the Mississippi" the building was not a flagship building of the La-Z-Boy Company, but rather an outpost far from the company's Michigan headquarters, and one that appeared on the scene decades after the company had garnered wide-spread brand recognition.

Sources consulted during this study have yielded no evidence that the former La-Z-Boy plant is closely associated with any specific events or persons of recognized historic significance. In terms of architectural, structural, engineering, or aesthetic merits, the building was designed by prominent Redland architect Leon Armantrout, who worked primarily in mid-20th century Modern and Late Modern styles. As noted above, Leon Armantrout's body of work is well represented in his catalogue of architectural drawings within the City of Redlands and the larger southern California region. For this building, the Modern-style design elements are largely confined to the central portion of the primary façade, while the rest of the building is functionally utilitarian, an expression sometimes in keeping with the style but overall appearing more vernacular or altered by later additions.

The La-Z-Boy plant is among a handful of industrial buildings to his credit, but despite being fewer in number, it does not stand out as an important or particularly remarkable example of Armantrout's body of work or of any style, property type, period, region, and method of construction. Furthermore, the 1960s era in industrial development is well documented in historical accounts, contemporary literature, as well as archival records, both nationwide and in the City of Redlands. As a result, this building holds little potential for any new or important data for the study of this subject. Based on these considerations, the present study concludes that 3963-1H does not appear eligible for listing in the California Register of Historical Resources or for local designation by the City of Redlands. Therefore, it does not meet the definition of a "historical resource" under CEQA provisions.

Site 3963-2H (Former Kimm Residence)

The Ranch-style residence at 360 Kansas Street was constructed around 1950. While it retains some elements recognizable to the era in scale and materials, such as a few surviving double-hung windows and a single-car garage, it has been significantly altered by additions, exterior wall cladding, and modern window replacements. Nevertheless, as a rural residence built amidst the groves in the waning years of Redlands robust citrus cultivation era, it shares an association with the city's long-held historical heritage and ensuing "citrus culture." Another historical theme that the

residence is associated with is the post-World War II boom in urban/suburban development throughout the U.S. and especially in southern California. While the residence retains sufficient integrity to relate to these patterns of events, once again it does not demonstrate a unique, significant, or particularly close association with the historical themes in comparison to the numerous other residential buildings of similar character and similar vintage that survive in and around Redlands.

The historical background research has not identified any persons or specific events of recognized significance in the history of the residence, nor any prominent architects, designers, or builders in association with its construction. Architecturally, the building is essentially vernacular in appearance, owing partly to the alterations, and does not represent an important example of its style,, type, period, region, or method of construction. With no notable qualities in design or construction, no documented historical association of importance, and little potential to yield any historical information, the residence at 360 Kansas Street does not appear to meet any of the criteria for listing the California Register of Historical Resource or for local designation, and does not qualify as a "historical resource," as defined above.

CONCLUSION AND RECOMMENDATIONS

CEQA establishes that a project that may cause a substantial adverse change in the significance of a "historical resource" is a project that may have a significant effect on the environment (PRC §21084.1). "Substantial adverse change," according to PRC §5020.1(q), "means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired."

In summary, the present study identified and recorded two groups of historic-period buildings within the project area, a La-Z-Boy furniture manufacturing plant at 301 Tennessee Street (Site 3963-1H) and a residence at 360 Kansas Street (Site 3963-2H), but neither of them appears eligible for listing in the California Register of Historical Resources or for local designation by the City of Redlands. Therefore, they do not constitute "historical resources" for CEQA-compliance purposes.

No other potential "historical resources" were encountered within or adjacent to the project area. However, the NAHC's response during this study indicated the presence of unspecified Native American cultural resource(s) in the general vicinity of the project location and referred further inquiry to the local Native American tribes. According to CEQA guidelines, the identification of potential "tribal cultural resources" is beyond the scope of this study and needs to be addressed through government-to-government consultations between the City of Redlands and the pertinent Native American groups pursuant to Assembly Bill (AB) 52.

Based on these findings, CRM TECH presents the following recommendations to the City of Redlands:

- A tentative conclusion of *No Impact* on known cultural resources appears to be appropriate for this project, pending the completion of the AB 52 consultation process to ensure the proper identification of potential "tribal cultural resources."

- No additional cultural resources investigation is necessary for the proposed project unless development plans undergo such changes as to include areas not covered by this study.
- If buried cultural materials are discovered during earth-moving operations associated with the project, all work within 50 feet of the discovery should be halted or diverted until a qualified archaeologist can evaluate the nature and significance of the finds.

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APPENDIX 1:
PERSONNEL QUALIFICATIONS

PRINCIPAL INVESTIGATOR, HISTORY/ARCHITECTURAL HISTORY

Education

1988-1993	Graduate Program in Public History/Historic Preservation, University of California, Riverside.
1987	M.A., American History, Yale University, New Haven, Connecticut.
1982	B.A., History, Northwestern University, Xi'an, China.
2000	"Introduction to Section 106 Review," presented by the Advisory Council on Historic Preservation and the University of Nevada, Reno.
1994	"Assessing the Significance of Historic Archaeological Sites," presented by the Historic Preservation Program, University of Nevada, Reno.

Professional Experience

2002-	Principal Investigator, CRM TECH, Riverside/Colton, California.
1993-2002	Project Historian/Architectural Historian, CRM TECH, Riverside, California.
1993-1997	Project Historian, Greenwood and Associates, Pacific Palisades, California.
1991-1993	Project Historian, Archaeological Research Unit, University of California, Riverside.
1990	Intern Researcher, California State Office of Historic Preservation, Sacramento.
1990-1992	Teaching Assistant, History of Modern World, University of California, Riverside.
1988-1993	Research Assistant, American Social History, University of California, Riverside.
1985-1988	Research Assistant, Modern Chinese History, Yale University.
1985-1986	Teaching Assistant, Modern Chinese History, Yale University.
1982-1985	Lecturer, History, Xi'an Foreign Languages Institute, Xi'an, China.

Cultural Resources Management Reports

Preliminary Analyses and Recommendations Regarding California's Cultural Resources Inventory System (with Special Reference to Condition 14 of NPS 1990 Program Review Report). California State Office of Historic Preservation working paper, Sacramento, September 1990.

Numerous cultural resources management reports with the Archaeological Research Unit, Greenwood and Associates, and CRM TECH, since October 1991.

PRINCIPAL INVESTIGATOR, ARCHAEOLOGY
Michael Hogan, Ph.D., RPA (Registered Professional Archaeologist)

Education

1991	Ph.D., Anthropology, University of California, Riverside.
1981	B.S., Anthropology, University of California, Riverside; with honors.
1980-1981	Education Abroad Program, Lima, Peru.
2002	"Section 106—National Historic Preservation Act: Federal Law at the Local Level," UCLA Extension Course #888.
2002	"Recognizing Historic Artifacts," workshop presented by Richard Norwood, Historical Archaeologist.
2002	"Wending Your Way through the Regulatory Maze," symposium presented by the Association of Environmental Professionals.
1992	"Southern California Ceramics Workshop," presented by Jerry Schaefer.
1992	"Historic Artifact Workshop," presented by Anne Duffield-Stoll.

Professional Experience

2002-	Principal Investigator, CRM TECH, Riverside/Colton, California.
1999-2002	Project Archaeologist/Field Director, CRM TECH, Riverside, California.
1996-1998	Project Director and Ethnographer, Statistical Research, Inc., Redlands, California.
1992-1998	Assistant Research Anthropologist, University of California, Riverside.
1992-1995	Project Director, Archaeological Research Unit, U.C. Riverside.
1993-1994	Adjunct Professor, Riverside Community College, Mt. San Jacinto College, U.C. Riverside, Chapman University, and San Bernardino Valley College.
1991-1992	Crew Chief, Archaeological Research Unit, U.C. Riverside.
1984-1998	Project Director, Field Director, Crew Chief, and Archaeological Technician for various southern California cultural resources management firms.

Research Interests

Cultural Resource Management, Southern Californian Archaeology, Settlement and Exchange Patterns, Specialization and Stratification, Culture Change, Native American Culture, Cultural Diversity.

Cultural Resources Management Reports

Principal investigator for, author or co-author of, and contributor to numerous cultural resources management study reports since 1986.

Memberships

Society for American Archaeology; Society for California Archaeology; Pacific Coast Archaeological Society; Coachella Valley Archaeological Society.

PROJECT HISTORIAN/ARCHITECTURAL HISTORIAN
Terri Jacquemain, M.A.

Education

2004	M.A., Public History and Historic Resource Management, University of California, Riverside.
2002	B.S., Anthropology, University of California, Riverside.
2001	Archaeological Field School, University of California, Riverside.
1991	A.A., Riverside Community College, Norco Campus.

Professional Experience

2003-	Historian/Architectural Historian/Report Writer, CRM TECH, Riverside/ Colton, California.
2002-2003	Teaching Assistant, Religious Studies Department, University of California, Riverside.
2002	Interim Public Information Officer, Cabazon Band of Mission Indians.
2000	Administrative Assistant, Native American Student Programs, University of California, Riverside.
1997-2000	Reporter, *Inland Valley Daily Bulletin*, Ontario, California.
1991-1997	Reporter, *The Press-Enterprise*, Riverside, California.

PROJECT ARCHAEOLOGIST/NATIVE AMERICAN LIAISON
Nina Gallardo, B.A.

Education

2004	B.A., Anthropology/Law and Society, University of California, Riverside.

Professional Experience

2004-	Project Archaeologist, CRM TECH, Riverside/Colton, California.

Honors and Awards

2000-2002	Dean's Honors List, University of California, Riverside.

PROJECT ARCHAEOLOGIST/REPORT WRITER
Nicole A. Raslich, M.A.

Education

2017-	Ph.D. candidate, Michigan State University, East Lansing.
2011	M.A., Anthropology, Michigan State University, East Lansing.
2005	B.A., Natural History of Biology and Anthropology, University of Michigan, Flint.
2022	Adult First Aid/CPR/AED Certification, American Red Cross.
2019	Grant and Research Proposal Writing for Archaeologists; SAA Online Seminar.
2014	Bruker Industries Tracer S1800 pXRF Training; presented by Dr. Bruce Kaiser, Bruker Scientific.
2013	Introduction to ArcGIS, Michigan State University, East Lansing.

Professional Experience

2022-	Project Archaeologist/Report Writer, CRM TECH, Colton, California.
2022	Archaeological Technician, Agua Caliente Band of Cahuilla Indians, Palm Springs, California.
2008-2021	Archaeological Consultant, Saginaw Chippewa Indian Tribe of Michigan.
2019	Archaeologist, Sault Tribe of Chippewa Indians and Little Traverse Bay Band of Odawa Indians
2018	Teaching Assistant, Michigan State University, East Lansing.
2017	Adjunct Professor, University of Michigan, Flint.
2015-2016	Graduate Fellow, Michigan State University Campus Archaeology Program, East Lansing.
2015	Archaeologist, Michigan State University, Illinois State Museum, and Dickson Mounds Museum.
2013-2015	Curation Research Assistant, Michigan State University Museum, East Lansing.
2008-2014	Research Assistant, Intellectual Property Issues in Cultural Heritage, Simon Frasier University, British Columbia, Canada.
2009-2012	Editorial Assistant/Copy Editor, *American Antiquity*.
2009-2011	Archaeologist/Crew Chief, Saginaw Chippewa Indian Tribe of Michigan.

Publications

2017	Preliminary Results of a Handheld X-Ray Fluorescence (pXRF) Analysis on a Marble Head Sarcophagus Sculpture from the Collection of the Kresge Art Center, Michigan State University. Submitted to Jon M. Frey, Department of Art, Art History, and Design. Michigan State University, East Lansing.
2016	Preserving Sacred Sites: Arctic Indigenous Peoples as Cultural Heritage Rights Holders (L. Heinämäki, T.M. Herrmann, and N.A. Raslich). University of Lapland Printing Centre, Rovaniemi, Finland.

PROJECT ARCHAEOLOGIST
Hunter C. O'Donnell, B.A.

Education

2016-	M.A. Program, Applied Archaeology, California State University, San Bernardino.
2015	B.A. (*cum laude*), Anthropology, California State University, San Bernardino.
2012	A.A., Social and Behavioral Sciences, Mt. San Antonio College, Walnut, California.
2011	A.A., Natural Sciences and Mathematics, Mt. San Antonio College, Walnut, California.
2014	Archaeological Field School, Santa Rosa Mountains; supervised by Bill Sapp of the United States Forest Service and Daniel McCarthy of the San Manuel Band of Mission Indians.

Professional Experience

2017-	Project Archaeologist, CRM TECH, Colton, California.
2016-2018	Graduate Research Assistant, Applied Archaeology, California State University, San Bernardino.
2016-2017	Cultural Intern, Cultural Department, Pechanga Band of Luiseño Indians, Temecula, California.
2015	Archaeological Intern, U.S. Bureau of Land Management, Barstow, California.
2015	Peer Research Consultant: African Archaeology, California State University, San Bernardino.

PROJECT ARCHAEOLOGIST
Cynthia Ayala, B.A.

Education

2021	B.A., Anthropology/Law and Society, University of California, Riverside (Dean's List; *cum laude*).
2018	A.A., Anthropology, Pasadena City College (Honors Award for Superior Achievement in Anthropology).
2018	Field School, Milford Archaeological Research Institute, Utah.
2017	Field School, La Suerte Biological Research Station/Maderas Rainforest Conservancy, Costa Rica.

Professional Experience

2022-	Project Archaeologist, CRM TECH, Colton, California.
2020-2021	Field Technician, Mckenna et al., Whittier, California, and Duke CRM, Irvine, California.

APPENDIX 2

SACRED LANDS FILE SEARCH RESULTS

NATIVE AMERICAN HERITAGE COMMISSION

CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

SECRETARY
Sara Dutschke
Miwok

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Buffy McQuillen
Yokayo Pomo, Yuki, Nomlaki

COMMISSIONER
Wayne Nelson
Luiseño

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
[Vacant]

COMMISSIONER
[Vacant]

EXECUTIVE SECRETARY
Raymond C.
Hitchcock
Miwok/Nisenan

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

December 8, 2022

Nina Gallardo
CRM TECH

Via Email to: ngallardo@crmtech.us

Re: **Proposed Redlands Warehouse Project at 301 Tennessee Street Assessor's Parcel Numbers** 0292-192-11 and -14 (CRM TECH No. 3963) Project, San Bernardino County

Dear Ms. Gallardo:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information submitted for the above referenced project. The results were positive. Please contact the Tribes on the attached list for information. Please note that tribes do not always record their sacred sites in the SLF, nor are they required to do so. A SLF search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with a project's geographic area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites, such as the appropriate regional California Historical Research Information System (CHRIS) archaeological Information Center for the presence of recorded archaeological sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. Please contact all of those listed; if they cannot supply information, they may recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our lists contain current information.

If you have any questions or need additional information, please contact me at my email address: Cameron.vela@nahc.ca.gov.

Sincerely,

Cameron Vela

Cameron Vela
Cultural Resources Analyst

Attachment

Native American Heritage Commission
Native American Contact List
San Bernardino County
12/8/2022

Agua Caliente Band of Cahuilla Indians
Patricia Garcia-Plotkin, Director
5401 Dinah Shore Drive — Cahuilla
Palm Springs, CA, 92264
Phone: (760) 699 - 6907
Fax: (760) 699-6924
ACBCI-THPO@aguacaliente.net

Agua Caliente Band of Cahuilla Indians
Reid Milanovich, Chairperson
5401 Dinah Shore Drive — Cahuilla
Palm Springs, CA, 92264
Phone: (760) 699 - 6800
Fax: (760) 699-6919
laviles@aguacaliente.net

Augustine Band of Cahuilla Mission Indians
Amanda Vance, Chairperson
84-001 Avenue 54 — Cahuilla
Coachella, CA, 92236
Phone: (760) 398 - 4722
Fax: (760) 369-7161
hhaines@augustinetribe.com

Cabazon Band of Mission Indians
Doug Welmas, Chairperson
84-245 Indio Springs Parkway — Cahuilla
Indio, CA, 92203
Phone: (760) 342 - 2593
Fax: (760) 347-7880
jstapp@cabazonindians-nsn.gov

Cahuilla Band of Indians
Daniel Salgado, Chairperson
52701 U.S. Highway 371 — Cahuilla
Anza, CA, 92539
Phone: (951) 763 - 5549
Fax: (951) 763-2808
Chairman@cahuilla.net

Chemehuevi Indian Tribe
Sierra Pencille, Chairperson
P.O. Box 1976 1990 Palo Verde Drive — Chemehuevi
Havasu Lake, CA, 92363
Phone: (760) 858 - 4219
Fax: (760) 858-5400
chairman@cit-nsn.gov

Colorado River Indian Tribes
Rebecca Loudbear, Attorney General
26600 Mohave Road — Chemehuevi, Mojave
Parker, AZ, 85344
Phone: (928) 669 - 1271
Fax: (928) 669-5675
rloudbear@critdoj.com

Fort Mojave Indian Tribe
Timothy Williams, Chairperson
500 Merriman Ave — Mojave
Needles, CA, 92363
Phone: (760) 629 - 4591
Fax: (760) 629-5767
lindaotero@fortmojave.com

Gabrieleno Band of Mission Indians - Kizh Nation
Andrew Salas, Chairperson
P.O. Box 393 — Gabrieleno
Covina, CA, 91723
Phone: (626) 926 - 4131
admin@gabrielenoindians.org

Gabrieleno/Tongva San Gabriel Band of Mission Indians
Anthony Morales, Chairperson
P.O. Box 693 — Gabrieleno
San Gabriel, CA, 91778
Phone: (626) 483 - 3564
Fax: (626) 286-1262
GTTribalcouncil@aol.com

Gabrielino /Tongva Nation
Sandonne Goad, Chairperson
106 1/2 Judge John Aiso St., #231 — Gabrielino
Los Angeles, CA, 90012
Phone: (951) 807 - 0479
sgoad@gabrielino-tongva.com

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Proposed Redlands Warehouse Project at 301 Tennessee Street Assessor's Parcel Numbers 0292-192-11 and -14 (CRM TECH No. 3963) Project, San Bernardino County.

Gabrielino Tongva Indians of California Tribal Council
Robert Dorame, Chairperson
P.O. Box 490 — Gabrielino
Bellflower, CA, 90707
Phone: (562) 761 - 6417
Fax: (562) 761-6417
gtongva@gmail.com

Gabrielino Tongva Indians of California Tribal Council
Christina Conley, Tribal Consultant and Administrator
P.O. Box 941078 — Gabrielino
Simi Valley, CA, 93094
Phone: (626) 407 - 8761
christina.marsden@alumni.usc.edu

Gabrielino-Tongva Tribe
Charles Alvarez,
23454 Vanowen Street — Gabrielino
West Hills, CA, 91307
Phone: (310) 403 - 6048
roadkingcharles@aol.com

Juaneno Band of Mission Indians Acjachemen Nation - Belardes
Matias Belardes, Chairperson
32161 Avenida Los Amigos — Juaneno
San Juan Capisttrano, CA, 92675
Phone: (949) 293 - 8522
kaamalam@gmail.com

Juaneno Band of Mission Indians Acjachemen Nation - Belardes
Joyce Perry, Tribal Manager
4955 Paseo Segovia — Juaneno
Irvine, CA, 92603
Phone: (949) 293 - 8522
kaamalam@gmail.com

Juaneno Band of Mission Indians Acjachemen Nation 84A
Heidi Lucero, Chairperson
31411-A La Matanza Street — Juaneno
San Juan Capistrano, CA, 92675
Phone: (562) 879 - 2884
hllucero105@gmail.com

Kern Valley Indian Community
Robert Robinson, Chairperson
P.O. Box 1010 — Kawaiisu
Lake Isabella, CA, 93240 — Tubatulabal
Phone: (760) 378 - 2915 — Koso
bbutterbredt@gmail.com

Kern Valley Indian Community
Julie Turner, Secretary
P.O. Box 1010 — Kawaiisu
Lake Isabella, CA, 93240 — Tubatulabal
Phone: (661) 340 - 0032 — Koso

Kern Valley Indian Community
Brandy Kendricks,
30741 Foxridge Court — Kawaiisu
Tehachapi, CA, 93561 — Tubatulabal
Phone: (661) 821 - 1733 — Koso
krazykendricks@hotmail.com

Los Coyotes Band of Cahuilla and Cupeño Indians
Ray Chapparosa, Chairperson
P.O. Box 189 — Cahuilla
Warner Springs, CA, 92086-0189
Phone: (760) 782 - 0711
Fax: (760) 782-0712

Morongo Band of Mission Indians
Robert Martin, Chairperson
12700 Pumarra Road — Cahuilla
Banning, CA, 92220 — Serrano
Phone: (951) 755 - 5110
Fax: (951) 755-5177
abrierty@morongo-nsn.gov

Morongo Band of Mission Indians
Ann Brierty, THPO
12700 Pumarra Road — Cahuilla
Banning, CA, 92220 — Serrano
Phone: (951) 755 - 5259
Fax: (951) 572-6004
abrierty@morongo-nsn.gov

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Pala Band of Mission Indians
Shasta Gaughen, Tribal Historic Preservation Officer
PMB 50, 35008 Pala Temecula Rd.
Pala, CA, 92059
Phone: (760) 891 - 3515
Fax: (760) 742-3189
sgaughen@palatribe.com
Cupeno
Luiseno

Pechanga Band of Indians
Mark Macarro, Chairperson
P.O. Box 1477
Temecula, CA, 92593
Phone: (951) 770 - 6000
Fax: (951) 695-1778
epreston@pechanga-nsn.gov
Luiseno

Pechanga Band of Indians
Paul Macarro, Cultural Resources Coordinator
P.O. Box 1477
Temecula, CA, 92593
Phone: (951) 770 - 6306
Fax: (951) 506-9491
pmacarro@pechanga-nsn.gov
Luiseno

Quechan Tribe of the Fort Yuma Reservation
Manfred Scott, Acting Chairman
Kw'ts'an Cultural Committee
P.O. Box 1899
Yuma, AZ, 85366
Phone: (928) 750 - 2516
scottmanfred@yahoo.com
Quechan

Quechan Tribe of the Fort Yuma Reservation
Jill McCormick, Historic Preservation Officer
P.O. Box 1899
Yuma, AZ, 85366
Phone: (760) 572 - 2423
historicpreservation@quechantribe.com
Quechan

Ramona Band of Cahuilla
John Gomez, Environmental Coordinator
P. O. Box 391670
Anza, CA, 92539
Phone: (951) 763 - 4105
Fax: (951) 763-4325
jgomez@ramona-nsn.gov
Cahuilla

Ramona Band of Cahuilla
Joseph Hamilton, Chairperson
P.O. Box 391670
Anza, CA, 92539
Phone: (951) 763 - 4105
Fax: (951) 763-4325
admin@ramona-nsn.gov
Cahuilla

Rincon Band of Luiseno Indians
Bo Mazzetti, Chairperson
One Government Center Lane
Valley Center, CA, 92082
Phone: (760) 749 - 1051
Fax: (760) 749-5144
bomazzetti@aol.com
Luiseno

Rincon Band of Luiseno Indians
Cheryl Madrigal, Tribal Historic Preservation Officer
One Government Center Lane
Valley Center, CA, 92082
Phone: (760) 297 - 2635
crd@rincon-nsn.gov
Luiseno

San Fernando Band of Mission Indians
Donna Yocum, Chairperson
P.O. Box 221838
Newhall, CA, 91322
Phone: (503) 539 - 0933
Fax: (503) 574-3308
ddyocum@comcast.net
Kitanemuk
Vanyume
Tataviam

San Manuel Band of Mission Indians
Jessica Mauck, Director of Cultural Resources
26569 Community Center Drive
Highland, CA, 92346
Phone: (909) 864 - 8933
Jessica.Mauck@sanmanuel-nsn.gov
Serrano

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

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Santa Rosa Band of Cahuilla Indians
Lovina Redner, Tribal Chair
P.O. Box 391820 — Cahuilla
Anza, CA, 92539
Phone: (951) 659 - 2700
Fax: (951) 659-2228
lsaul@santarosa-nsn.gov

Serrano Nation of Mission Indians
Mark Cochrane, Co-Chairperson
P. O. Box 343 — Serrano
Patton, CA, 92369
Phone: (909) 528 - 9032
serranonation1@gmail.com

Serrano Nation of Mission Indians
Wayne Walker, Co-Chairperson
P. O. Box 343 — Serrano
Patton, CA, 92369
Phone: (253) 370 - 0167
serranonation1@gmail.com

Soboba Band of Luiseno Indians
Joseph Ontiveros, Cultural Resource Department
P.O. BOX 487 — Cahuilla
San Jacinto, CA, 92581 — Luiseno
Phone: (951) 663 - 5279
Fax: (951) 654-4198
jontiveros@soboba-nsn.gov

Soboba Band of Luiseno Indians
Isaiah Vivanco, Chairperson
P. O. Box 487 — Cahuilla
San Jacinto, CA, 92581 — Luiseno
Phone: (951) 654 - 5544
Fax: (951) 654-4198
ivivanco@soboba-nsn.gov

Torres-Martinez Desert Cahuilla Indians
Cultural Committee,
P.O. Box 1160 — Cahuilla
Thermal, CA, 92274
Phone: (760) 397 - 0300
Fax: (760) 397-8146
Cultural-Committee@torresmartinez-nsn.gov

Twenty-Nine Palms Band of Mission Indians
Darrell Mike, Chairperson
46-200 Harrison Place — Chemehuevi
Coachella, CA, 92236
Phone: (760) 863 - 2444
Fax: (760) 863-2449
29chairman@29palmsbomi-nsn.gov

Twenty-Nine Palms Band of Mission Indians
Anthony Madrigal, Tribal Historic Preservation Officer
46-200 Harrison Place — Chemehuevi
Coachella, CA, 92236
Phone: (760) 775 - 3259
amadrigal@29palmsbomi-nsn.gov

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Proposed Redlands Warehouse Project at 301 Tennessee Street Assessor's Parcel Numbers 0292-192-11 and -14 (CRM TECH No. 3963) Project, San Bernardino County.

APPENDIX 3

CALIFORNIA HISTORICAL RESOURCES INVENTORY RECORD FORMS

Sites 3963-1H and 3963-2H
(Temporary Designations)

State of California--The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

PRIMARY RECORD

Primary # _____
HRI # _____
Trinomial _____
NRHP Status Code 6Z
Other Listings _____
Review Code _____ Reviewer _____ Date _____

*Resource Name or # (Assigned by recorder) CRM TECH 3963-1H

P1. **Other Identifier:** Former La-Z-Boy furniture manufacturing plant

***P2.** **Location:** ☐ **Not for Publication** ☒ **Unrestricted** ***a. County** San Bernardino

and (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)

*b. **USGS 7.5' Quad** Redlands, Calif. **Date** 1996

T1S **R**3W; SE **1/4 of Sec** 28 (extrapolated); S.B. **BM** (San Bernardino land grant)

c. **Address** 301 Tennessee Street **City** Redlands **Zip** 92373

d. **UTM:** (Give more than one for large and/or linear resources) **Zone** 11 ; 481,427 **mE**/ 3,768,406 **mN**

UTM Derivation: ☐ USGS Quad ☐ GIS ☒ Google Earth

e. **Other Locational Data:** (e.g., parcel #, directions to resource, elevation, decimal degrees, etc., as appropriate) Assessor's Parcel Number 0929-192-11; on the northwest corner of State Street and Tennessee Street

***P3a** **Description:** (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries) The former La-Z-Boy manufacturing plant at 301 Tennessee Street consists of a main office/warehouse building and two smaller auxiliary buildings of concrete tilt-up construction situated to the north, all of them resting on concrete slab foundations with flat roofs. The main building is a tall one-story steel-frame and concrete structure that covers nearly two acres. Its squarish shape is a product of later additions that effectively doubled the original footprint, while some of the additions resulted in protrusions from the building. The concrete cladding covers nearly all of the exterior, leaving the building relatively blind but punctuated by loading docks with roll-up doors or single entries filled with metal commercial doors. (*Continued on p. 4*)

***P3b.** **Resource Attributes:** (List attributes and codes) HP8: Industrial building

***P4.** **Resources Present:** ☒ Building ☐ Structure ☐ Object ☐ Site ☐ District ☐ Element of District ☐ Other (isolates, etc.)

P5a. **Photograph or Drawing** (Photograph required for buildings, structures, and objects.)



P5b. **Description of Photo** (view, date, accession number): Photo taken on February 14, 2023; view to the northwest

***P6.** **Date Constructed/Age and Sources:** ☒ Historic ☐ Prehistoric ☐ Both 1965

***P7.** **Owner and Address:** Duke Realty Tennessee Street LP, 1420 Rocky Ridge Drive, Suite 380, Roseville, CA 95661

***P8.** **Recorded by** (Name, affiliation, & address): Hunter O'Donnell, CRM TECH, 1016 East Cooley Drive, Suite A/B, Colton, CA 92324

***P9.** **Date Recorded:** November 17, 2022

***P10.** **Survey Type** (describe): Intensive-level survey for CEQA compliance purposes

***P11.** **Report Citation:** (Cite survey report and other sources, or enter "none.") Bai "Tom" Tang, Terri Jacquemain, Nicole Raslich, and Hunter O'Donnell (2023): Historical/Archaeological Resources Survey Report: Assessor's Parcel Numbers 0292-192-11 and -14, City of Redlands, San Bernardino County, California

***Attachments:** ☐None ☒Location Map ☐Sketch Map ☒Continuation Sheet ☒Building, Structure, and Object Record ☐Archaeological Record ☐District Record ☐Linear Resource Record ☐Milling Station Record ☐Rock Art Record ☐Artifact Record ☐Photograph Record ☐Other (List): _____

BUILDING, STRUCTURE, AND OBJECT RECORD

*NRHP Status Code 6Z

*Resource Name or # (Assigned by recorder) CRM TECH 3963-1H

B1. Historic Name: La-Z-Boy

B2. Common Name:

B3. Original Use: Office/manufacturing

B4. Present Use: Office

***B5. Architectural Style:** Modern/vernacular

***B6. Construction History:** (Construction date, alterations, and date of alterations) The former La-Z-Boy furniture manufacturing plant was built for the company in 1965 and served in that capacity until October 2019, when the plant was closed. It was originally a 72,000-square-foot manufacturing plant. In 1972-1973, 43,600 square feet were added to the factory and 800 square feet to the front office, followed by a 624-square-foot tilt-up panel addition and another 9,225 square feet in 1991. The two ancillary buildings to the north of the (*Continued on p. 4*)

***B7. Moved?** √ No Yes Unknown **Date:** **Original Location:**

***B8. Related Features:** See Item P3a.

B9a. Architect: Leon H. Armantrout

b. Builder: Forsberg and Gregory, Inc.

***B10. Significance: Theme** Post-World War II industrial development

Area Redlands

Period of Significance 1960s

Property Type Industrial/manufacturing

Applicable Criteria N/A

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.) The former La-Z-Boy furniture manufacturing plant a is among several industrial buildings constructed in the vicinity during the 1960s-1970s period, in the early days of the development of an industrial district in the western portion of the City of Redlands. Its construction reflected the City's increasing efforts to diversify its economic base in the post-World War II era. At the time, the La-Z-Boy Company was already prominent in the industry and was pursuing a multi-state expansion. The building is (*Continued on p. 4*)

B11. Additional Resource Attributes: (List attributes and codes)

B12. References: City of Redlands building and safety records; various local newspaper accounts, www.newpapers.com; aerial photographs taken in 1959-2020, www.historicaerials.com; La-Z-Boy, Inc.: Corporate Commitment, www.la-z-boy.com/content/AboutLaZBoy/corporate-commitment.

B13. Remarks:

***B14. Evaluator:** Terri Jacquemain

***Date of Evaluation:** January 20, 2023

(Sketch Map with north arrow required.)



(This space reserved for official comments.)

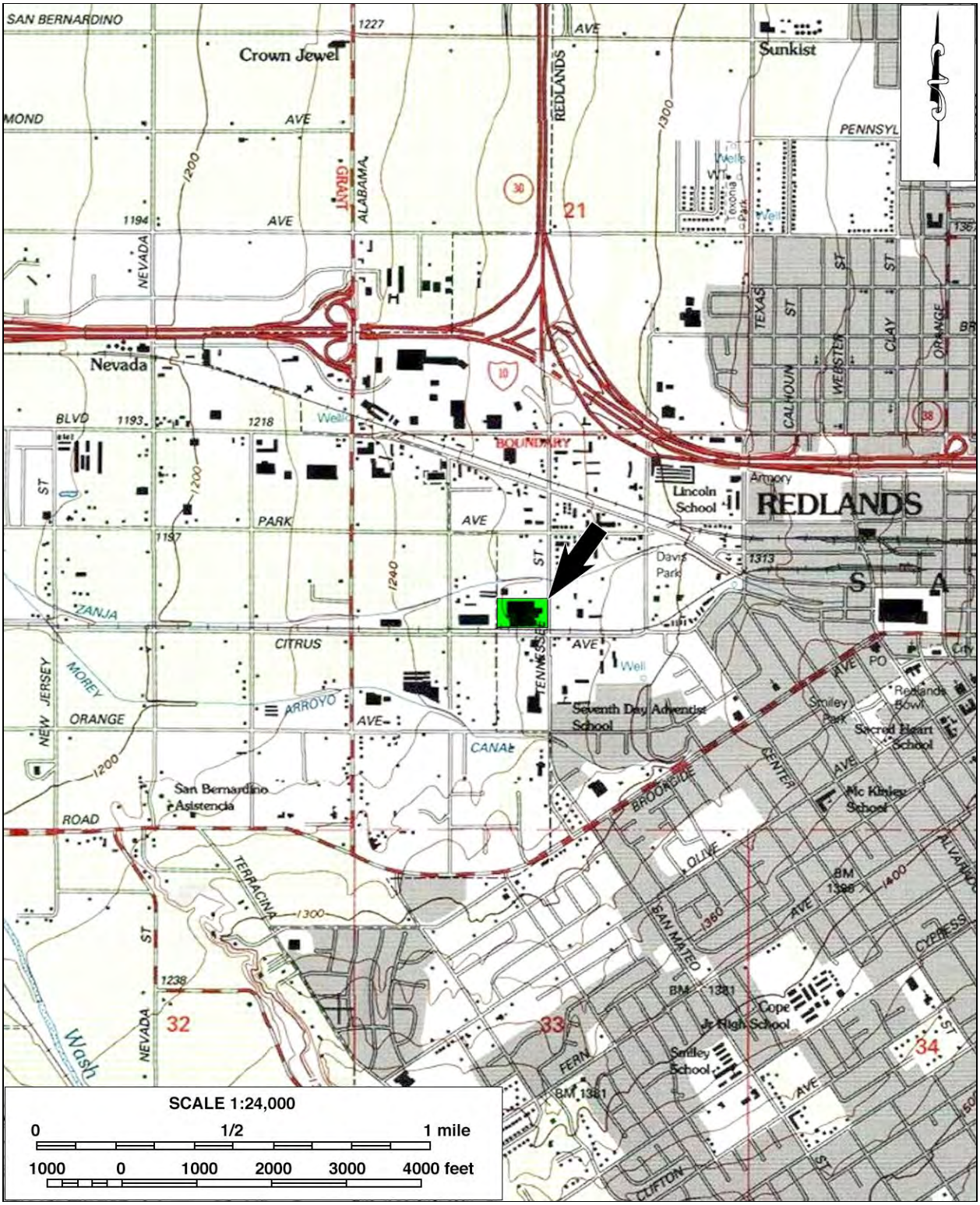
State of California--The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

LOCATION MAP

Primary #
HRI #
Trinomial

Page 3 of 5 *Resource Name or # (Assigned by recorder) CRM TECH 3963-1H

*Map Name: Redlands, Calif. *Scale: 1:24,000 *Date of Maps: 1996



Recorded by: Hunter O'Donnell
***Date:** November 17, 2022 √ Continuation Update

***P3a. Description (**continued**):** The rectangular front office portion on the eastern side, facing Tennessee Street, has a flat but lower roof, with its Armantrout-designed Modern-style elements somewhat overshadowed by the sizable unadorned additions at either end. Nevertheless, the Modern style remains apparent in the deeply recessed main entry between slightly over-extended brick partitions sheltering a plateglass wall and a metal-framed glass door with a transom. Varnished pine wood slats cover the entry ceiling, while square cut-outs in the brick sides allow a view of low-growing tropical plant gardens that flank the entry. A steel-framed enclosure reaching the roof level is filled on the top two-thirds by smoke glass, and open at the bottom. The entry is accessed by a brick-edged pebbled concrete walkway, flanked by low planters and paved parking lots and driveway.

***B6. Construction History (continued):** main plant, measuring 12,000 and 28,000 square feet, are both concrete tilt-up structures erected in 1969. A 1,300-square-foot conference room was added in 2004, and the monument sign along Tennessee Street was installed in 2014.

Architect Leon H. Armantrout moved to Redlands in 1960 and opened his office there in 1964. He has built an impressive body of work in Mid-Century Modern and Late Modern styles, including many custom homes and eye-catching institutional, professional, commercial, educational, and religious buildings. In 2013, Armantrout donated a catalog of his Redlands architectural drawings to the A.K. Smiley Public Library, among them those for the First United Methodist Church, the relocation and expansion of the ESRI campus, Redlands Community Center, Town Square Design for Redlands Mall, Empire Bowl, Redlands Medical Center, and the San Bernardino County Museum.

***B10. Significance (continued):** arguably associated with a pattern of events or a local historical theme, namely Redlands' transition away from its horticulture roots, and is also notable for its association to an innovative, industry-leading company. In neither case, however, does the building demonstrate a particularly important or close association in comparison to other properties known for similar associations.

To wit, the historical theme of mid-20th century industrial growth is well-represented by industrial and commercial enterprises of similar vintage throughout the Redland area, particularly the western portion of the city, and furniture manufacturing was not a dominant industry in the area or a particularly prominent element of the local economy. In regard to the association to the La-Z-Boy Company, although hailed as being the "first west of the Mississippi" the building was not a flagship building of the La-Z-Boy Company, but rather an outpost far from the company's Michigan headquarters, and one that appeared on the scene decades after the company had garnered wide-spread brand recognition.

Sources consulted during this study have yielded no evidence that the former La-Z-Boy plant is closely associated with any specific events or persons of recognized historic significance. In terms of architectural, structural, engineering, or aesthetic merits, the building was designed by prominent Redland architect Leon Armantrout, who worked primarily in mid-20th century Modern and Late Modern styles. Armantrout's body of work is well represented in his catalogue of architectural drawings within the City of Redlands and the larger southern California region. For this building, the

(*Continued on p. 5*)

Recorded by: Hunter O'Donnell
***Date:** November 17, 2022 √ Continuation Update

***B10. Significance (continued):** Modern-style design elements are largely confined to the central portion of the primary façade, while the rest of the building is functionally utilitarian, an expression sometimes in keeping with the style but overall appearing more vernacular or altered by later additions.

The La-Z-Boy plant is among a handful of industrial buildings to his credit, but despite being fewer in number, it does not stand out as an important or particularly remarkable example of Armantrout's body of work or of any style, property type, period, region, and method of construction. Furthermore, the 1960s era in industrial development is well documented in historical accounts, contemporary literature, as well as archival records, both nationwide and in the City of Redlands. As a result, this building holds little potential for any new or important data for the study of this subject. Based on these considerations, the former La-Z-Boy furniture manufacturing plant does not appear eligible for listing in the National Register of Historic Places or the California Register of Historical Resource.

State of California--The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code 6Z
Other Listings
Review Code Reviewer Date

Page 1 of 4 *Resource Name or # (Assigned by recorder) CRM TECH 3963-2H

P1. Other Identifier: 360 Kansas Street

***P2. Location:** ☐ **Not for Publication** ☒ **Unrestricted** ***a. County** San Bernardino
and (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)

*b. **USGS 7.5' Quad** Redlands, Calif. **Date** 1996
T1S **R**3W; SE **1/4 of Sec** 28 (extrapolated); S.B. **BM** (San Bernardino land grant)

c. **Address** 360 Kansas Street **City** Redlands **Zip** 92373

d. **UTM:** (Give more than one for large and/or linear resources) **Zone** 11 ; 481,167 **mE**/ 3,768,453 **mN**
UTM Derivation: ☐ USGS Quad ☐ GIS ☒ Google Earth

e. **Other Locational Data:** (e.g., parcel #, directions to resource, elevation, decimal degrees, etc., as appropriate) Assessor's Parcel Number 0929-192-14; on the east side of Kansas Street, approximately 350 feet north of State Street

***P3a Description:** (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries) This Ranch-style one-story residence with an attached garage is a wood-framed structure built on a U-shaped plan. It rests on a concrete foundation and is surmounted by a medium-pitched hip roof sheathed in brown composition shingles. An addition with a shed roof is attached to the eastern (rear) side at the middle section. Light-colored stucco clads most of the exterior, although there are small half-wall sections of brick-and-mortar and vertical tooth-and-groove wood siding on the rear addition. Fenestration is a mix of vintage and recent windows of various size, as are the sashes adorning the entry doors. A modern metal roll-up door fills the entry to the garage, which is topped by a cupola at the roof ridge. Two wood-framed corrugated-metal sheds accompany the house in the rear.

***P3b. Resource Attributes:** (List attributes and codes) HP2: Single-family residence

***P4. Resources Present:** ☒ Building ☐ Structure ☐ Object ☐ Site ☐ District ☐ Element of District ☐ Other (isolates, etc.)

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects.)



P5b. Description of Photo (view, date, accession number): Photo taken on November 17, 2022; view to the east

***P6. Date Constructed/Age and Sources:** ☒ Historic ☐ Prehistoric ☐ Both
Ca. 1950

***P7. Owner and Address:** Duke Realty Tennessee Street LP, 1420 Rocky Ridge Drive, Suite 380, Roseville, CA 95661

***P8. Recorded by** (Name, affiliation, & address): Hunter O'Donnell, CRM TECH, 1016 East Cooley Drive, Suite A/B, Colton, CA 92324

***P9. Date Recorded:** November 17, 2022

***P10. Survey Type** (describe): Intensive-level survey for CEQA compliance purposes

***P11. Report Citation:** (Cite survey report and other sources, or enter "none.") Bai "Tom" Tang, Terri Jacquemain, Nicole Raslich, and Hunter O'Donnell (2023): Historical/ Archaeological Resources Survey Report: Assessor's Parcel Numbers 0292-192-11 and -14, City of Redlands, San Bernardino County, California

***Attachments:** ☐None ☒Location Map ☐Sketch Map ☒Continuation Sheet ☒Building, Structure, and Object Record ☐Archaeological Record ☐District Record ☐Linear Resource Record ☐Milling Station Record ☐Rock Art Record ☐Artifact Record ☐Photograph Record ☐Other (List):

BUILDING, STRUCTURE, AND OBJECT RECORD

*NRHP Status Code 6Z

*Resource Name or # (Assigned by recorder) CRM TECH 3693-2H

B1. Historic Name:

2.Common Name:

B3. Original Use: Residence

B4. Present Use: Vacant

***B5. Architectural Style:** Ranch

***B6. Construction History:** (Construction date, alterations, and date of alterations) The residence was built around 1950 and was originally accompanied by a long rectangular structure at the rear, or east. In 1954 it was the family home of Alex and Sadie Kimm, who were engaged in chicken ranching with other family members. The Kimms remained property owners until 1995, when it was deeded to Rettig Machine Shop. Building permits for this address include one issued to the Kimms in 1982 to repair fire damage and a reroof permit issued to Bob Rettig in 2010.

***B7. Moved?** √ No ___ Yes ___ Unknown **Date:** ___ **Original Location:**

***B8. Related Features:** See Item P3a.

B9a. Architect: Unknown

b. Builder: Unknown

***B10. Significance: Theme** Early post-World War II transition (rural to suburban)

Area Redlands

Period of Significance 1945-1965

Property Type Residential

Applicable Criteria N/A

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.) While this circa 1950 residence retains some elements recognizable to the era in scale and materials, such as a few surviving double-hung windows and a single-car garage, it has been significantly altered by additions, exterior wall cladding, and modern window replacements. Nevertheless, as a rural residence built amidst the groves in the waning years of Redlands robust citrus cultivation era, it shares an association with the city's long-held historical heritage and ensuing "citrus culture." (*Continued on p. 4*)

B11. Additional Resource Attributes: (List attributes and codes)

B12. References: Genealogical database entries for Kimm family members, www.ancestry.com; San Bernardino County Assessor's real property tax assessment database; City of Redlands building and safety records; aerial photographs taken in 1952-2020, mil.library.ucsb.edu/ap_indexes/FrameFinder/ and www.historicaerials.com.

B13. Remarks:

***B14. Evaluator:** Terri Jacquemain

***Date of Evaluation:** February 19, 2023

(Sketch Map with north arrow required.)



(This space reserved for official comments.)

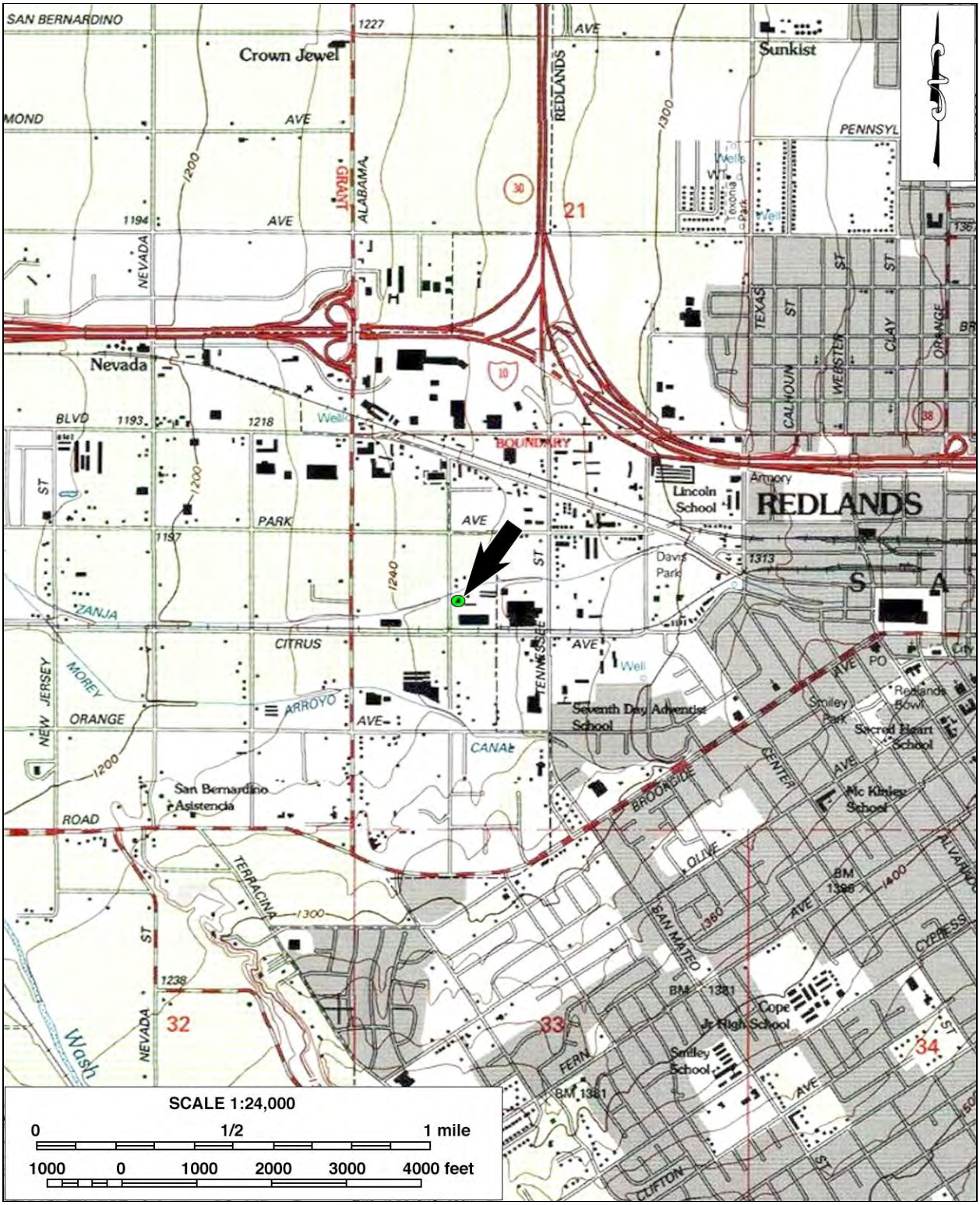
State of California--The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

LOCATION MAP

Primary #
HRI #
Trinomial

Page 3 of 4 *Resource Name or # (Assigned by recorder) CRM TECH 3963-2H

*Map Name: Redlands, Calif. *Scale: 1:24,000 *Date of Maps: 1996



Recorded by: Hunter O'Donnell
***Date:** November 17, 2022 √ Continuation Update

***B10. Significance (continued):** Another historical theme that the residence is associated with is the post-World War II boom in urban/suburban development throughout the U.S. and especially in southern California. While the residence retains sufficient integrity to relate to these patterns of events, it does not demonstrate a unique, significant, or particularly close association with the historical themes in comparison to the numerous other residential buildings of similar character and similar vintage that survive in and around Redlands.

The historical background research has not identified any persons or specific events of recognized significance in the history of the residence, nor any prominent architects, designers, or builders in association with its construction. Architecturally, the building is essentially vernacular in appearance, owing partly to the alterations, and does not represent an important example of its style, type, period, region, or method of construction. With no notable qualities in design or construction, no documented historical association of importance, and little potential to yield any historical information, the residence at 360 Kansas Street does not appear to meet any of the criteria for listing the National Register of Historic Places or California Register of Historical Resources.

From:	Ryan Nordness
To:	Sean Reilly
Subject:	RE: City of Redlands AB-52 Tribal Consultation Notice - CRA-948, Tennessee Warehouse Project
Date:	Monday, September 26, 2022 12:51:06 PM

[**NOTICE:** This message originated outside of City of Redlands -- **DO NOT CLICK** on **links** or open **attachments** unless you are sure the content is safe.]

Hello Sean,
Thank you for contacting the Yuhaaviatam of San Manuel Nation (formerly known as the San Manuel Band of Mission Indians) regarding the above referenced project. YSMN appreciates the opportunity to review the project documentation, which was received by our Cultural Resources Management Department on September 22nd, 2022, pursuant to CEQA (as amended, 2015) and CA PRC 21080.3.1. The proposed project area exists within Serrano ancestral territory and, therefore, is of interest to the Tribe. However, due to the nature and location of the proposed project, and given the CRM Department's present state of knowledge, YSMN does not have any concerns with the project's implementation, as planned, at this time. As a result, YSMN requests that the following language be made a part of the project/permit/plan conditions:

CUL MMs

1. In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, as detailed within TCR-1, regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.

2. If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to YSMN for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.

3. If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.

TCR MMs

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

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 YSMN. The Lead Agency and/or applicant shall, in good faith, consult with YSMN throughout the life of the project.

Note: Yuhaaviatam of San Manuel Nation realizes that there may be additional tribes claiming cultural affiliation to the area; however, Yuhaaviatam of San Manuel Nation can only speak for itself. The Tribe has no objection if the agency, developer, and/or archaeologist wishes to consult with other tribes in addition to YSMN and if the Lead Agency wishes to revise the conditions to recognize additional tribes.

Please provide the final copy of the project/permit/plan conditions so that YSMN may review the included language. This communication concludes YSMN's input on this project, at this time, and no additional consultation pursuant to CEQA is required unless there is an unanticipated discovery of cultural resources during project implementation. If you should have any further questions with regard to this matter, please do not hesitate to contact me at your convenience, as I will be your Point of Contact (POC) for YSMN with respect to this project.

Respectfully,
Ryan Nordness

From: Sean Reilly <sreilly@cityofredlands.org>
Sent: Thursday, September 22, 2022 2:34 PM
To: Sean Reilly <sreilly@cityofredlands.org>
Subject: City of Redlands AB-52 Tribal Consultation Notice - CRA-948, Tennessee Warehouse Project

Good afternoon,
Please see the attached AB-52 Project Notification.

In accordance with Assembly Bill 52, the City of Redlands is sending this notice to inform California Native American tribes that have requested such notice of a project application within a geographic area with which the tribe is traditionally and culturally affiliated. California Public Resources Code §21080.3.1 requires this notice within 14 days of the City determining this application is complete and/or after the City has decided to undertake a project. California Native American tribes have 30 days from the date of this notice to request consultation with the City regarding this project.

Please contact me with any questions.

Thank you,

Sean Reilly
Principal Planner
City of Redlands
35 Cajon St., Ste. 20/P.O. Box 3005
Redlands, CA 92373
Office 909.798.7555 ext. 7344
Fax 909.792.8715

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If you are on your Outlook client, report the suspicious email by clicking on Report Phish icon in your Outlook toolbar.
If you are on a mobile device, forward the suspicious email to spam@sanmanuel.com.

ATTACHMENT “C”

Photographs

Main Building


301


301














53'
53'
53'
53'


2
3


SPEED
LIMIT
5











Accessory
Building No. 1






EVERGREEN
53'
53'











Accessory
Building No. 2







ATTACHMENT “D”

Resolution No. 2026-03

RESOLUTION NO. 2026-03

A RESOLUTION OF THE HISTORIC AND SCENIC PRESERVATION COMMISSION OF THE CITY OF REDLANDS APPROVING DEMOLITION PERMIT NO. 404 TO DEMOLISH AN INDUSTRIAL BUILDING, TWO ACCESSORY BUILDINGS, AND OTHER RELATED ON-SITE IMPROVEMENTS LOCATED AT 301 TENNESSEE STREET (APN: 0292-192-11-0000)

WHEREAS, the applicant, Duke Realty Tennessee Street LP c/o Prologis, Inc., has submitted an application for Demolition Permit No. 404 to demolish an industrial building and two accessory buildings that are total approximately 196,972 square-feet in size and over 50 years of age, and other related on-site improvements. The subject property is located at 301 Tennessee Street (APN: 0292-192-11-0000) within the Industrial (I-P) District; and

WHEREAS, notice of this Historic and Scenic Preservation Commission public hearing was provided in accordance with Redlands Municipal Code Section 15.44; and

WHEREAS, on November 5, 2026, the Historic and Scenic Preservation Commission held a public hearing and considered the staff report, oral presentation, the testimony and the written evidence submitted by and on behalf of the applicant and by members of the public; and

WHEREAS, the proposal is subject to the California Environmental Quality Act (CEQA), and a Mitigated Negative Declaration was previously adopted for the project and demolition in accordance with Section 15162 of the CEQA Guidelines; and

WHEREAS, following the public hearing for the Demolition, the Historic and Scenic Preservation Commission determined that the structure does not have historical significance and does not require further environmental review under the California Environmental Quality Act.

NOW, THEREFORE, BE IT RESOLVED BY THE HISTORIC & SCENIC PRESERVATION COMMISSION OF THE CITY OF REDLANDS AS FOLLOWS:

Section 1. The proposed project is subject to the California Environmental Quality Act (CEQA), and a Mitigated Negative Declaration was previously adopted for the project and demolition which made the determination, pursuant to adopted mitigation measures, there is no substantial evidence that the project may have a significant effect on the environment.

Section 2. The proposed demolition is hereby approved subject to the conditions of approval contained in Exhibit A attached to this Resolution.

Section 3. This Resolution shall become effective upon adoption and shall be subject to a ten (10) day appeal period.

ADOPTED, SIGNED, AND APPROVED THIS 5th DAY OF NOVEMBER, 2026.

_____
Kurt Heidelberg, Historic and Scenic Preservation Commission Chair

ATTEST:

_____
Sonya Flint, Secretary

I, Sonya Flint, Secretary to the Historic and Scenic Preservation Commission of the City of Redlands, hereby certify that the foregoing resolution was duly adopted by the Historic and Scenic Preservation Commission at a regular meeting thereof held on the 5th day of November, 2026.

AYES:
NOES:
ABSENT:
ABSTAINED:

_____
Sonya Flint, Historic and Scenic Preservation Commission Secretary

EXHIBIT A
CONDITIONS OF APPROVAL
DEMOLITION NO. 404

1. This approval is to demolish an industrial building and two accessory buildings that are a total of approximately 196,972 square-feet in size and over 50 years of age, and other related on-site improvements. The subject property is located at 301 Tennessee Street (APN: 0292-192-11-0000) within the Industrial (I-P) District.

2. Prior to demolition, a building permit shall be obtained from the Development Services Department.

3. The issuance of any permits shall comply with all provisions of the Redlands Municipal Code, including Section 15.44 which regulates the demolition of structures.

4. Unless demolition has commenced pursuant to a building permit, this application shall expire eighteen (18) months from the approval date.

5. All demolition activities shall be limited to the hours from 7:00 a.m. to 6:00 p.m., Monday through Saturday, and prohibited on Sundays and Federal holidays.

6. The applicant for this permit, and its successors and assigns, shall defend, indemnify and hold harmless the City of Redlands, and its elected officials, officers, agents and employees, from and against any and all claims, actions, and proceedings to attack, set aside, void or annul the approval of this permit by the City, or brought against the City due to acts or omissions in any way connected to the applicant's project that is the subject of this permit. This indemnification shall include, but not be limited to, damages, fees, costs, liabilities, and expenses incurred in such actions or proceedings, including damages for the injury to property or persons, including death of a person, and any award of attorneys' fees. In the event any such action is commenced to attack, set aside, void or annul all, or any, provisions of this permit, or is commenced for any other reason against the City for acts or omissions relating to the applicant's project, within fourteen (14) City business days of the same, the applicant shall file with the City a performance bond or irrevocable letter of credit (together, the "Security") in a form and in an amount satisfactory to the City, to ensure applicant's performance of its defense and indemnity obligations under this condition. The failure of the applicant to provide the Security shall be deemed an express acknowledgement and agreement by the applicant that the City shall have the authority and right, without objection by the applicant, to revoke all entitlements granted for the project pursuant to this permit. The City shall have no liability to the applicant for the exercise of City's right to revoke this permit.

End of Conditions of Approval