CITY OF HIGHLAND
REGULAR MEETING OF THE PLANNING COMMISSION AGENDA

REGULAR MEETING

December 21, 2021
6:00 p.m.
City Hall
Donahue Council Chambers
27215 Base Line
Highland, California

MEMBERS

Randall Hamerly, Chair
Chandra Thomas, Vice Chair
Edward Amaya, Commissioner
Jarrod Miller, Commissioner
Jessica Sutorus, Commissioner

STAFF

Lawrence A. Mainez, Community Development Director
Kim Stater, Assistant Community Development Director
Ash Syed, Associate Planner
Angela Tafolla, Assistant Planner
Angelica Martinez, Planning Technician II
Camille Goritz, Administrative Assistant III

MISSION STATEMENT

Highland is dedicated to the betterment of the individual, the family, the neighborhood and the community. The City Council and the staff of Highland are dedicated to providing the quality of public facilities and services that its citizens are willing to fund and will do so as efficiently as possible.

Visit the City's Website at: www.cityofhighland.org

The City of Highland complies with the Americans with Disabilities Act of 1990. If you require special assistance to attend or participate in this meeting, please call the City Clerk's Office at (909) 864-6861 Ext. 226, at least 48 hours prior to the meeting.

Pursuant to Government Code Section 54957.5, any disclosable public records related to an open session item on a regular meeting agenda and distributed by the City of Highland to all or a majority of the Planning Commission, less than 72 hours prior to that meeting, are available for public inspection at Highland City Hall, 27215 Base Line, Highland, CA 92346, during normal business hours.

Submission of Public Comments: To limit the number of persons in the Council Chambers, the public is encouraged to make public comments by email rather than in person. For those wishing to make public comments by email to be read aloud at the meeting by the Community Development Administrative Assistant. Email comments must be submitted by 5:00 p.m. on December 21, 2021 to publiccomment@cityofhighland.org.

For those wishing to make a public comment regarding a public hearing item, please identify the agenda item in the subject line. Comments can be submitted any time prior to the meeting, as well as during the meeting up until the end of the corresponding item. Please email your comments to publiccomment@cityofhighland.org. Members of the public will be permitted to make public comments in person.

PLANNING COMMISSION
REGULAR MEETING AGENDA
December 21, 2021 - 6:00 P.M.

CALL TO ORDER

PLEDGE OF ALLEGIANCE

COMMUNITY INPUT (ITEMS NOT ON THE AGENDA)

To address the Planning Commission, please complete a speaker form located at the entrance and give it to the Administrative Assistant prior to the beginning of the meeting. Your name will be called when it is your turn to speak. Individual speakers are limited to three minutes each. Comments received via email by December 7, 2021, 5:00 p.m., will be read into the record, provided that the reading shall not exceed three (3) minutes.

CONSENT CALENDAR

1. Minutes from the December 7, 2021 Regular Meeting.

   RECOMMENDATION: That the Planning Commission approve the minutes, as submitted.

PUBLIC HEARING

2. Conditional Use Permit (CUP-21-007) to permit the development and operation of a 305,617 square foot warehouse and associated improvements, Variance VAR-21-001 to allow the warehouse building to exceed the maximum building height permitted in the Business Park Zone by 10', Design Review DRA-21-005 for the project's Site Plan, Building Elevations, Rough Grading Plan and Conceptual Landscape Plan, and Tentative Parcel Map 20384/TPM-21-002 to combine six (6) parcels into one (1) located at the northwest corner of 6th Street and Victoria Avenue; (Assessor's Parcel Numbers 1192-281-09 through 14) – Patriot USICV Victoria, LLC.

RECOMMENDATION: Staff recommends the Planning Commission:

1. Adopt Resolution No. 2021 - _____ approving Conditional Use Permit CUP-21-007 for the development of a 305,617 square foot warehouse building and related improvements;

2. Adopt Resolution No. 2021 - ____ approving Variance VAR-21-001 allowing an increase in the maximum building height for the subject warehouse from 35' to 45' tall, 10' greater than permitted in the Business Park Zone;

3. Adopt Resolution No. 2021- ___ approving Design Review Application DRA-21-005 for the Site Plan, Building Elevations, Rough Grading Plan and Conceptual Landscape Plan, subject to the Conditions of Approval, and the Findings of Fact;

4. Adopt Resolution No. 2021-___ approving Tentative Parcel Map 20384 TPM-21-002, creating a single lot for the project, subject to the Conditions of Approval, and the Findings of Fact; and

5. Adopt Resolution No. 2021-___ approving a Mitigated Negative Declaration and direct Staff to File and Notice of Determination with San Bernardino County Clerk of the Board of Supervisors.

3. Design Review Application (DRA 21-017) for the exterior remodel of an existing Wendy's drive-thru restaurant including new sings, paint, and accent features located at 27879 Base Line (APN No. 1201-091-55) – Cotti Foods.

RECOMMENDATION: Staff recommends the Planning Commission:

1. Adopt Resolution 21-____, approving Design Review Application (DRA 21-017) for the exterior remodel of an existing Wendy's drive-thru restaurant including new signage, paint and accent finishes, subject to the Conditions of Approval and Findings of Fact; and

2. Direct staff to file a CEQA Notice of Exemption with the County Clerk of the Board of Supervisors.

ANNOUNCEMENTS

ADJOURN

I, Camille Goritz, Administrative Assistant III of the City of Highland, California, certify that I caused to be posted this agenda on or before the 16th of December 2021 by 5:30 p.m. on our website at www.cityofhighland.org and in the following designated areas:

Highland Branch Library 7863 Central Avenue	Fire Station No. 1 26974 Base Line	City Hall 27215 Base Line

Date: December 16, 2021

Kim Stater for Camille Goritz Administrative Assistant III

STAFF REPORT

TO THE PLANNING COMMISSION

DATE: December 21, 2021

FROM: Lawrence Mainez, Community Development Director

PREPARED BY: Kim Stater for Camille Goritz, Administrative Assistant III

SUBJECT: Minutes from the December 7, 2021 Planning Commission Regular Meeting.

RECOMMENDATION: Staff recommends the Planning Commission approve the Minutes as submitted.

PUBLIC NOTICE: The agenda for this item was posted at the three locations per Resolution No. 2011-047 and on the City's website.

Approved _____	Motion _____	Second _____	Agenda Item No. 1
Denied _____	Ayes _____		
Continued _____	Noes _____		File No. _____
Tabled _____	Abstain _____		
	Absent _____		

Kim Stater for

Recording Secretary

Lawrence Mainez

Community Development Director

MINUTES
PLANNING COMMISSION REGULAR MEETING
November 2, 2021

CALL TO ORDER

The regular meeting of the Planning Commission of the City of Highland was called to order at 6:00 p.m. by Chair Hamerly at the Donahue Council Chambers, 27215 Base Line, Highland, California.

Present:	Chair	Randall Hamerly
	Vice Chair	Chandra Thomas
	Commissioner	Edward Amaya
	Commissioner	Jarrod Miller
	Commissioner	Jessica Sutorus

Staff Present: Lawrence Mainez, Community Development Director
Kim Stater, Assistant Community Development Director
Ash Syed, Associate Planner
Matt Bennett, Assistant Public Works Director
Matt Wirz, Building Official
Scott Rice, City Landscape Architect
Camille Goritz, Administrative Assistant III

The Pledge of Allegiance was led by Chair Hamerly.

Chair Hamerly stated we do also have an announcement. Anybody that is here hoping to hear Agenda item 2, this was a CUP for two drive-thru restaurants. The applicant has pulled that item to a future unknown date at this point.

Associate Planner Syed stated yes, thank you very much Commissioner. The applicant has requested a continuation of that item to a date specific meeting of January 18, 2022, for further consideration.

Chair Hamerly stated very good so noted. Thank you.

COMMUNITY INPUT (ITEMS NOT ON THE AGENDA)

None

CONSENT CALENDAR

1. Minutes from the November 16, 2021 Regular Meeting.

Chair Hamerly stated okay, so the first item we have, these are the minutes from November 16th, 2021. This was a regular meeting of the Planning Commission. Were there any modifications or notes to the Minutes as submitted? I had a handful. Page 2 of 9, 5th paragraph down. Goats and sheeps. Sheep is plural, lose the S. The next

paragraph down the very last sentence, the definition was a cleft hoof. Page 7 of 9, second paragraph from the bottom, second line, quote from Director Mainez, think we must treat even one complaint, it is an as, as opposed to an is.

Commissioner Thomas stated I had one on page 7 of 9, as well at the very bottom, the last sentence. Same time, I understand that you have that wrought iron should say fence right behind your home.

Chair Hamerly stated and then I do not know if this is the only occurrence of this, but on page 8 of 9, 3rd paragraph down, the sound that the goats were making is bleating with a T. We do not want goats bleeding all over the minutes. And I do not know if that is the only occurrence or not, but that seemed to be the central focus of that agenda item. If there are no further modifications, I will entertain a motion to approve the minutes, as amended

A MOTION was made by Commission Sutorus, seconded by Commissioner Amaya, to approve the minutes, as amended. Motion carried, 5-0.

PUBLIC HEARING

2. Conditional Use Permit (CUP 21-001) for a commercial development consisting of a 2,560 square foot and 4.050 square foot drive-thru restaurant building on approximately 2.04 acres at the northeast corner of Base Line and Buckeye Street. Related entitlements include Lot Line Adjustment (LLA 21-001) to create two (2) equal sized parcels, Design Review Application (DRA 21-001) for the site plan, building elevations, conceptual landscape plan and grading plan for the two pads, General Plan Amendment (GPA 21-001) to allow drive-thru uses in the General Plan Town Center Area, and Mitigated Negative Declaration (ENV 21-004). (APN No.1200-421-02 & -03) — Marinita Development.

   The applicant has requested a continuation of the item to a date specific meeting of January 18, 2022, for further consideration.

3. Conditional Use Permit (CUP 21-006) for a Mixed-Use development consisting of five (5) commercial tenant buildings, one (1) 21-unit multi-family residential building and one (1) single-family residence fronting Villa Avenue on approximately 9.06 acres at the northwest corner of Base Line and Church Avenue. Related entitlements include Tentative Parcel Map (TPM 21-001) to create seven (7) new lots, General Plan Amendment (GPA 21-0021) to allow drive-thru uses in the General Plan Town Center Area, and Design Review Application (DRA 21-004) fora site plan, building elevations, conceptual landscape plan, grading plan for a retail use (Tractor Supply Company), and Mitigated Negative Declaration (ENV 21-003). APN No. 1200-381-05 and -43 — Woodcrest Real Estate Ventures.

   Chair Hamerly stated up next, we have a conditional use permit CUP 21-006 for a mixed-use development consisting of five commercial tenant buildings, one 21-unit multifamily residential building and one single family residence fronting Villa

Avenue on approximately 9.06 acres at the northwest corner of Base Line and Church. Related entitlements include a tentative tract map to create 7 new lots. A general plan amendment to allow drive-thru uses in the general plan town center area and design review application for site plan building elevations, conceptual landscape plan, and grading plan for a retail use and mitigated negative declaration. At this time, we will proceed with the staff report.

Associate Planner Syed stated thank you very much chairman and good evening planning commissioners. The applicant is actually just running a few minutes late, but we will go ahead and get started anyways. So, the project site is located at the northwest corner of Base Line and Church Avenue and consists of two adjacent parcels, equaling just over 9 acres in total. The property is currently vacant with no vegetation and has remained this way since prior to the City's incorporation in 1987. The site is surrounded by a variety of uses that include single family homes to the north, the St Adelaide Church to the south, the Smart and Final grocery store to the east and the Family Dollar store to the west. The applicant is requesting the approval of a conditional use permit, a tentative parcel map, a general plan amendment, and a design review application for the development of five commercial buildings, a 21-unit apartment complex and a single-family home. The project will ultimately be constructed in four total phases. The layout of the site features in 18,800 square foot Tractor Supply Company building toward the center with a designated parking area in front. At the southeast corner of the site are two drive-thru restaurants and a small retail building that share a parking area accessible from the interior drive aisle off Church Avenue. The northeast corner of the site features a large commercial building that does not have a confirmed tenant as of yet. The residential portion will feature an apartment complex at the northwest corner, as well as a single-family home at the far north that fronts Villa Avenue. A staple of commercial developments within the town center policy area, the applicant has proposed a Plaza similar to the one constructed as part of the Smart and Final development across Church Avenue in 2017. The overall design of the Plaza has been slightly altered since the initial submittal, so the applicant will be providing details on the revisions following this presentation. There are a total of six trash enclosures proposed on the site. Each located outside a rear entrance or with an ADA compliant path of travel to and from its location. Each of these trash enclosures will feature disposal bins for general waste, recycling, and organics. Primary access to the commercial portion of the site would be from Base Line on the south with secondary access from Church Avenue on the east and a connection to Foster Avenue to the west. The driveway along Church Avenue will allow both left and right turns from and onto the roadway, while the driveway along Base Line will allow only right turns into and out of the shopping center due to the median. As mentioned, there is a 21-unit apartment complex proposed at the northwest corner of the development. At 12.2 dwelling units an acre, the residential density is well below the maximum limit of 18 dwelling units per acre in the mixed-use zone. Regarding the parking standards, commercial uses are subject to a parking requirement of one spot per 250 square feet of indoor space and one spot per 1,000 square feet of outdoor space. Additionally, indoor dining is subject to one spot per 75 square feet of dining area, and residential parking is subject to 2.5

spaces per unit. While the 87 total spaces that are provided for the Tractor Supply Company building falls just short of the 95 total spaces required, it is still within 10% of the parking requirement with additional spaces available elsewhere on the site, deeming this acceptable per the Municipal Code. The applicant has proposed two 10-foot-tall monument signs as part of this development. One will be located along Base Line and will feature signage for a Tractor Supply Company along with the fast-food restaurants and small commercial store at the corner. The other monument sign will be located along Church Avenue and will feature signage for the other large scale commercial building as well as the fast-food restaurants and small commercial store at the corner as well. Regarding building mounted signage, the applicant has not determined the size or sign area limits for the other four commercial buildings on the site as of yet. As conditioned, the applicant will submit elevations and a completed sign program application in the future for a Planning Commission review. Currently, the General Plan's vision for the Town Center policy area is geared toward walk-in businesses and sit-down restaurants. Thus, there has always been a restriction on the approval of drive-thru uses in this area. However, as times evolve and curbside pickup options and drive through options have become the norm, the applicant is proposing to remove the entire Town Center policy areas restriction on drive-thru's with this General Plan amendment. Staff is seeking the Planning Commission's view on this regarding this proposal. The Planning Commission recommendation will be presented to the City Council for their consideration. The construction of the site will occur in four separate phases. Each phase shall require the approval of a separate Design Review application that will be presented to the Planning Commission for approval. Today, we are looking at only phase one, which is Design Review application number 21-004 regarding the construction of the 18,800 square foot Tractor Supply Company store. Adjacent to the west side of the building will be approximately 19,800 square feet of outdoor space to be used for gardening supplies, animal fencing, fruit trees and etc. Located in front of the store will be an additional 7,300 square feet of outdoor displays that include ATV's, paddle boats, and various seasonal items. The proposed hours of operation will be from 8:00 AM to 10:00 PM, seven days a week, with holiday season and promotional hours of 6:00 AM to 12:00 AM. The Tractor Supply Company building features a relatively flat roof and an overall facade design to architecturally compliment the parcels that have been recently developed within the Town Center policy area, the building primarily features a desert gray stucco exterior with a red-hot jazz painted trim around the perimeter of the roof line and along the lower portion of the building. The storefront as well as the raised parapet are accented by a La Habra Fallbrook taupe and embellished with deep brown CMU blocks around the bottom portion. The eastern side also features several trellises with vines for aesthetic variety. While Tractor Supply Company has a corporate color and design scheme for its buildings, the architectural elements have been altered to complement the features from nearby commercial structures and comply with the vision for the Town Center area. The conceptual landscape plan offers various drought tolerant trees, shrubs, and vines throughout the site. Along the Base Line frontage are a combination of dwarf nandina and rosemary plants accented by California fan palm

trees. Meanwhile, the landscape islands and curbside planters include pine, iceberg, rose, and variegated mock orange plants, among others. Located along the perimeter of the parking area are African sumac trees and Chinese pastiche trees planted at each interior landscape island. The conceptual landscape plan has been reviewed by the City's landscape architects and conditions have been included as part of the conditions of approval. The product is adjacent to the existing residential homes to the north and the Family Dollar Store and a few residences along Foster Avenue to the west. As previously mentioned, there is an existing 6-foot-wide utility easement that spans along the northern property line of the development. While a new 6-foot-tall CMU wall was initially proposed along the northern boundary of the site, the applicant did inform Staff that Edison has requested that they not construct the new block wall over concerns of reduced accessibility to the easements. The applicant will provide further details regarding that conversation with Edison following this presentation. The City oversaw the preparation of an initial study mitigated negative declaration as part of the CEQA review process. It was determined that the project could result in potentially significant impacts to biological resources relating to the potential habitat disturbance to state and federally protected nesting birds as well as to transportation related to the potential increase to traffic along Base Line. Per the mitigation measures for protecting nesting birds, all clearing, and tree removals will be conducted outside of the February 1 to August 31, bird nesting season. Should any tree removal or ground disturbance need to occur during the nesting season a preconstruction survey will be conducted by a qualified Avian biologist before any work can commence. Per the mitigation measures for the increased traffic, as a result of the project, Foster Avenue will be re-striped to include one left turn lane and one right turn lane at the westbound Palm Avenue approach. Additionally. Church Avenue will be re-striped to include two left turn lanes and one shared through traffic/right turn lane at the southbound Base Line approach. Lastly a traffic signal will be added at the southbound access onto Base Line to control traffic exiting the shopping center during the PM peak hours. Staff has received two comment letters from surrounding property owners in response to the project notice. Both letters express general concern regarding privacy, noise, and traffic. A thorough analysis of the project impact was completed during the preparation of the mitigated negative declaration and specific mitigation measures to address these concerns were included in the MMRP. This mixed-use development proposes a logical project layout for a vacant site adjacent to residential homes along Villa Avenue to the north and commercial businesses along Base Line. With dedicated parking areas, adequate setbacks, and interior roadway dimensions, the site plan presents satisfactory vehicular circulation and pedestrian access. Additionally, the exterior elevations of the Tractor Supply Company building offer contemporary architectural treatments that fit with the vision for the Town Center policy area and still comply with the corporate standards. Staff recommends the Planning Commission adopt resolution approving Conditional Use Permit number 21-006, Tentative Parcel Map number 21-001, Design Review Application number 21-004 and recommend that the City Council approve General Plan Amendment 21-002.

Chair Hamerly stated are there any questions of staff on the staff report prior to the applicant's presentation?

Associate Planner Syed stated I think the applicant is also here too, to add to the presentation.

Chair Hamerly stated right, the directive was, if there were any questions specifically for the staff report portion of this prior to the applicant's presentation. We're not going into the design review discussion at this point, or any of these specific items, but if anybody had any questions specifically regarding your presentation, now is the opportunity for that.

Commissioner Amaya stated it's just the initial study. I think you covered it. I just wanted to make sure, on page 53, those are the three mitigation measures. I see traffic is probably the big issue here. That on on TRA #3 is, that's correct that that's what proposed Bonita Drive and Base Line is going to be signalized.

Associate Planner Syed stated I think I think on my illustration it was in the wrong location. It's on the south side, the traffic signal.

Commissioner Amaya stated but it's still going to be there or no.

Assistant Community Development Director Stater stated why don't we defer to Engineering.

Assistant Public Works Director Bennett stated just as Associate Planner Syed was presenting. You are correct that one of the mitigations recommended improvements were signalized intersection or restricted left turn movements and so on. If you see Engineering Condition 14, is written to address the potential modification to that intersection. Not at the center of the development, but actually next-door neighbor in front of the Dollar store. There's a reciprocal access easement across that drive approach. At this entrance, exit here and then into the Tractor Supply development. There was an evaluation that the signalized intersection at that location wasn't warranted but was one of the recommended improvements that could be suggested. Again, Engineering Condition 14 speaks to the expectation of the project constructing some configuration to restrict the left turns out of that movement as opposed to a traffic signal. So, neither location would be a signalized intersection.

Commissioner Miller stated the reason I asked is the item that was pulled, I think, wasn't the recommendation there for a signal at Church or because my only comment is that you have a traffic signal at Palm and Base Line, and you have one at the freeway right now. And so, I guess that's what the study, why the item was pulled to because the feasibility of adding another traffic signal there. And now we're just mentioning here. I guess that's something that we will go through.

Assistant Public Works Director Bennett stated this is a different location from the other conversation and this is shown within their study as recommended or alternative. The engineering department looked at that and determined that the alternative and the fact that a signalized intersection wasn't warranted at that location it wouldn't be conditioned to be constructed. So, you're correct, the intermediate, you know, between Palm and Church, the proximity of putting another signal in is not functionally the best approach, and so that's why we're looking at an alternative to that.

Commissioner Miller stated I know one of the like second order effects of the development happens. You know, for example, the Dollar Tree and Bakers, when I go, I make a left turn out of there, to go east and it's not too bad right now, as far as traffic. But in the future, if everything happens and traffic increases, that's going to be really tight just to make a left turn at a Dollar Tree and Baker's shopping center, right there, to go east on Base Line.

Assistant Public Works Director Bennett stated that's what was noted within the report, the level of service and the concern for that left turn movement. Traffic will increase over time and that's why they brought that as a recommendation.

Chair Hamerly stated so then following up on that condition of approval 16. If the Engineering Department is not recommending any signals, does that just stay in as a placeholder or do we delete condition 16?

Assistant Public Works Director Bennett stated by traffic control signs, stop, yield you know that type of signage, not traffic signal.

Commissioner Sutorus stated I just had one quick one. Can you show me on the map where that easement, where a brick wall was going to go in and where it can't and what was that blocking? Is that residential home right there?

Associate Planner Syed stated its right along the northern boundary of the site, that's adjacent to the backyards.

Commissioner Sutorus stated and the elevation, are the houses above or below. Are they flat?

Associate Planner Syed stated I'm not sure the exact height difference, but I don't know the exact height difference, but it is lower, this proposed site.

Assistant Public Works Director Bennett stated the pads are at grade at Church and then it may be 3 to 4 feet above ta the corner, the home is 3 to 4 feet above.

Commissioner Miller stated so the original general plan had a prohibition on freestanding drive-thru's, is that correct? And the intent of having that prohibition was to create some balance between fast food and sit-down restaurants. Is that correct?

Assistant Community Development Director Stater stated to encourage walkability, pedestrian mobility, and outdoor dining. Well, pedestrian mobility between businesses along the entire corridor. That was amended at one time to allow drive-thrus at the intersection of Palm and Base Line, and this will further really open it up to the entire section between Palm and the freeway.

Commissioner Miller stated so then if we dismiss this prohibition or allow for an exemption, do we have a plan to strike that balance in the future or is it case by case basis, project by project basis?

Assistant Community Development Director Stater stated it's something that we try and balance every day, when projects come to the City, and that we try to encourage, and there is push back at almost every opportunity. So really the best thus far we've been able to get is outdoor seating. Uses themselves, I mean it worked back in 2006, when the land use element was adopted. It really was the idea of the entire corridor and then kind of bit by bit, it's been it's been chipped away at. So, we tried, the Council tried, the Planning Commission tried, and it just hasn't been the desire of the marketplace to put the types of uses that we had once hoped for there.

Commissioner Miller stated have we lost hope for that or is there? Is there still potential?

Assistant Community Development Director Stater stated well, that's why it's being a recommendation will be from the Planning Commission to the City Council to get the opinion of yourselves and the Council to see if we stand strong with the existing policy. Or if it really is no longer feasible in the corridor.

Chair Hamerly stated we invite the applicant to make their presentation.

Steve Powell, Woodcrest Real Estate Venues, stated thank you very much. My name is Steve Powell and I'm here with Lauren Schulte. We are with Woodcrest. We are a sister company of Hicks Snedeker, and we are out of Daphne, Alabama. We build for a couple of national credit tenants. We are the largest developer of Tractor Supply in the nation, and we build in 47 states. We are extremely excited to be here in the City of Highland. We've looked at this location for quite a while. We also are in parallel with this, doing a Tractor Supply in Jurupa Valley, so this works well with the the program that we started here in Southern California with Tractor Supply back in 2012. Without getting into the history of Tractor Supply, I can say that they're excited to be at this location when we look for a new location, ideally, we would like to find 4 acres zoned appropriately that would fit our package nicely, but those kinds of locations don't seem to exist too often anymore. When we saw this piece of property here, it was two acres, I mean, I'm sorry, two legal parcels in roughly 10 acres and I think you all know the owner of this property and we had long, long discussions with him about various opportunities. We do develop other master plan type commercial developments and residential projects. So, it is in our wheelhouse, but we weren't able, or we

weren't successful in order to do a boundary adjustment in order to get those four acres, it was either buy the entire thing or not. So, we brought in our analytics department and analyzed what would be the best suited need for this particular project. Ideally, we were going to put Tractor Supply on the corner, but because of the acquisition costs associated with it and the overall development and our relationship with the tenant. They agreed that we can take Tractor Supply and put it on the inside parcel knowing that in order to justify the overall development, we would have to do something special on the corner. And come to some of the discussion points and about like the the the, the QSR'S or the quick serve restaurants, the drive-thrus. A lot of pressure has been put on us over the last couple of years, especially with the pandemic situation. We've had a lot of projects change, especially in the restaurant industry where the demand for a drive thru component is almost mandatory. We're working with a number of restaurants right now that that you would be surprised that have changed their business model to accommodate drive thrus. So that was important, and we did work with staff, and we work with the Director, and we work with the Assistant Director and some of the planners. Our original layout, which I'm not sure if all of you were able to see, only had to do two drive through components and we did sit down and understood how important the outdoor pedestrian friendly, that component was to it, so we redesigned and we have preliminary discussions with all the outparcels on the corner, the the larger one and the three tenants there, but we don't have any committed lease agreements yet. So, we are doing the best we can to develop something that would work whether, you know, we adjust it and they would obviously be their own design review application and they would be more heavily scrutinized when those applications come in, but we did design roughly just north of 3,000 square foot more of a sit down opportunity on the the hard corner of Base Line and Church where we tried to build a complementary Plaza entrance for lack of better words to the Smart and Final. Ours is a little bit different, it's more reflected on the landscape plan and we do have, and I apologize, we do have some of our consultants here. Our civil, our architect, our traffic engineer, our civil engineer. So, on the corner of Base Line and Church there, like I said, it's complementary, so it has some pedestrian benches. It has a heavier landscape component. One of the things that was brought up in one of the staff meetings that we had was the historic, yes, right there, the historic identification, and I think we were told to go take a look at the CVS parking lot and there's a kiosk in the parking lot and so we came up with something that was maybe a little bit more monumental that would be easier to maintain, but also give an opportunity to say, you know, the historic trail or we won't have what the exact verbiage would be when it gets designed on the corner, but that leads into sort of a Plaza area that would allow for a sit down component that would again connect through a sidewalk that ultimately would meander throughout the entire development. So, while the final details on these particular uses can't be designed yet, until we have those actual end uses, that's how we envision the spaces to be utilized. As far as Tractor Supply, I think, I appreciate your presentation. I think you hit all points. We have modified not only the style of the building but how we address the required elements that Tractor Supply requires. Which is trailer display and when I say trailer display, those little

tow behind flatbed trailers, the location of that. The fenced in outdoor display area which basically accommodates items that are too large to put in the store, whether that's fencing materials or round pins and that sort of thing. So, we worked hard in order to accommodate the tenants needs, but also visually camouflage it to where it blends in well with the development. I don't remember you mentioning we do have sort of a potential two phased approach where the garden center may be enhanced, but that is in a second phase and the tenant may not go through with that so that's why we are proposing it that way. Then at the same time we have the property that came as part of the acquisition to the north, which is the apartment component. We did analyze the need for housing, and this is something that we've got on a number of projects. We do housing projects. We've got one that's about 250 units right now outside of Fairhope, Alabama and we've got another 55 units in San Diego County, so this is in our wheelhouse. I wish it really could be 200 units as opposed to 21 units, but these are set up to be more, and we're going to address this, I think in more detail in January, but just to sort of fill in the picture here, these are more set up as townhome residential units, so that while they're not townhomes they're not stacked and attached flats. They have garages they have indoor laundry. We tried actually to work with the the the environmental department to get individual trash cans with the automated trash trucks but we we've worked out a more attractive situation with the dumpster enclosure and then at the far north with the one white block up there, that is actually not a part of it, and this dovetails into the Southern California Edison discussion which is a rather large vacant lot. That lot was actually going to be two single families. You'll see if you look closely on to the left side or to the west and north of the Green Line, there's sort of a hashed-out area there. That actually belongs to us as part of the property, but that that neighbor there has got a block wall. We actually haven't even engaged with that neighbor at this point, but one of the Staff recommendations was sort of the queer nature of that little finger that sticks out to the far west at the upper portion of it. When we looked at this, he has his block wall built onto our property and then by the time we tried to make the adjustments to make this townhome concept work. It was just better to say, you know what, let's propose a boundary adjustment. Give that property to that neighbor, who will allow him to keep that real estate alone, and we won't have to disrupt his block walls and then we'll just make a larger single-family parcel to the north. So that's where that goes. In regard to the single families, I believe that there are six or seven others along the north. Yes, OK, so there's eight single families to the north of our project and there is an Edison power line that runs through there and we've met with Edison. The power poles actually are off right off of our property and there is an existing block wall of sorts that that goes between each of the single. It peters out to the east, so I believe that it's a wood fencing, but all of those are on the private property and I believe that they were set in that location because there's a 6-foot easement that runs on each side of the center line of the power lines, so it encroaches onto our property by 6 feet. There are some areas where the poles have guide wires that come down onto our property with that, we have to create a further easement around. So, in our residential and commercial development there, if a wall or a fence or some kind of screening was to be placed, we would

have to place that outside of the easement for the benefit of Edison. So that's open for discussion on how that should be addressed. We do have a parking field for the apartments that is on this, that ends right at the edge of that 6 foot. So, if there was a fence there that may create a potential problem, or we would have to shorten the depth of those parking stalls. But again, how to address that best and most effectively, we just have to respect the easement. Edison really isn't in favor of us putting it in the middle of their easement and then as far as the development itself, it is proposed to be done in phases. The Tractor Supply being the primary tenant will be constructed as soon as we can get through construction docs and as such, with those offsite improvements would be constructed all the way around the property. The internal circulation, roads, the extension of Foster and the driveway, which was designed in that particular location to be in alignment with the driveway that goes into the Smart and Final center. So that was sort of a given as to where that would go, and then the improvements along Church would be constructed, there's a couple of driveways that would be closed up on Base Line there and then we're going to construct the new driveway entrance into the center itself as part of the Tractor Supply development. At the same time, and we will be processing the construction documents for the apartment project which we will do once we mobilize for Tractor Supply. We will also mobilize right shortly thereafter for the apartment project to construct that, but like I said for phase three and phase four until we get solid commitments, we are in discussions. In fact, ICSC is going on right now in Las Vegas and two of our principles are out there right now. Now the attendance normally is at 100,000 it's at 9,000 this year. So, it's way, way, way down. But those discussions, I promise you are happening and there's a couple of folks that you would know that are interested in this, but we cannot honestly, propose a project without having a solidified commitment in hand. So that is sort of where that stand. Rest assured, all the offsite improvements, our objective would be, let's just say in the hypothetical that those tenants don't come to fruition, we believe that they will. Tractor supply usually is a a pretty good anchor tenant and a good neighbor with others. We have experienced that on just about 100% of our projects. But if in the event that doesn't happen our proposal would be to bluetop those lots. So, we would construct the infrastructure, water, sewer, fire, underground utilities, that sort of thing. Bring it onto the property, let's say 10 feet, put BMP's all the way around, hydroseed the property and then make it nice buildable pads. This location, this section of Highland is beautiful. I think that whoever master planned Base Line did a fantastic job, that the tenant speaking for Tractor Supply in particular, is very proud of this location and is excited to get there. Ideally, we wanted a left and left out, for full transparency on Base Line, but we have the connectivity to Church, which is an improved signalized intersection, and it was mentioned that there is a cross access easement onto the Dollar property where there is full access. Our customer base typically will, as far as truck deliveries and that sort of thing will utilize the driveway off of Base Line and that's what that hammerhead section is in the back there. They will go down; they go into the loading dock and then they would probably go out Foster in that direction. All the utilities are underground. The site itself doesn't have an extreme topographical change. I think the Engineer had mentioned the elevation of the single families. It

is varying, but it's about four or five feet higher in most places. Other than that, you know we're excited to be here, and we're, you know, willing to take any questions or concerns that you guys may have and go from there.

Chair Hamerly stated thank you any questions for the applicant at this time.

Commissioner Sutorus stated I don't have any questions, but I just want to make a comment and thank you for considering coming to Highland. I think the Tractor Supply store is really going to be an exciting addition to Highland. We have so many colleagues, residents and friends who go to Tractor Supply all the way in Calimesa now. So, this will be so nice.

Steve Powell stated it's funny you say that. We did a store in Ramona. It was the first one in Southern California and we had the customer base was drawing from Calexico. Calexico, Mexico. I mean, it's it's that powerful and I don't know if everybody here has been to a Tractor Supply.

Commissioner Sutorus stated I go all the time.

Steve Powell stated well, the way I describe it is. And we built for a couple of other tenants that could arguably be a little bit more controversial, but Tractor Supply is sort of like the Nordstrom's for the hobby farmer and Tractor Supply is not, generally speaking, going for the thousands and thousands of acres of what you would see in Central Valley. Their primary focus is on the hobby farmer with10 acres or less and one of the big drivers for the demographics, believe it or not, and they have got demographers like you would not believe, is equestrian. So, they identify a horse community, and they know where the horse people come from because horse people generally speaking are dog people, and if you've been into a Tractor Supply, they got quite a quite a large pet selection too, but it's funny because if we do get opposition, generally speaking, it is from other feed stores. But this is an honest to God truth and we've got documented proof. It's sort of like if you want to open up a dress shop. You don't want to be next to the Am/Pm you want to be next to 10 other dress shops. Tractor Supply gravitates so many equestrian folks that it actually enhances the specialty liveries and especially feed stores. Because those folks, generally speaking, that they may sell saddlery and they, generally speaking, know more about the hobby farming industry. But the folks that shop at Tractor Supply, really endorse the livestock. They know what they want. They know the fencing. They know that tractor implements and the other misnomer with Tractor Supply is because we did a Tractor Supply in Temecula. At the entrance of the wine country and it was very controversial because they said how are you going to be delivering all these tractors and we don't sell tractors, you know, its farm implements. So, it's Tractor Supply, but it really is Carhartt clothing, Justin Boots and electric fireplaces. So, I'll stop right there, but I am a big fan too.

Commissioner Sutorus stated thank you. You answered all my questions actually with your presentation, so I appreciate that, and I have a good understanding of what you're going to do with the parcels now, so thank you.

Steve Powell stated and just for full transparency too. We want this to be the best it can be, and we want it because we are not just the applicant, we are the owners were the developers, were fully vertically integrated company and we are the general contractors. We have a general contractor division. Like I said, we're under Woodcrest. We also are the Hicks Snedeker companies out of Daphne, Alabama and our construction company is Fulcrum Construction Group, also based out of Daphne, Alabama. Our specialty is we build about 40 Tractor Supply's a year and so it really, truly is important for us and we did get a lot of feedback. Actually, on the architectural end of things, it's like, Oh my gosh, when we got the new renditions. At first was like, oh, I'm going to fight this, but then I looked at it and actually it did. Whoever sent the recommendation for, you know, the way that is designed, it ended up being a huge coup, so I appreciate that.

Commissioner Miller stated you had mentioned earlier that given the current climate, that fast food is has really become a requirement for you, and I wanted to ask, is fast food necessary for this project to move forward?

Steve Powell stated well, actually for clarification, fast food is not our primary tenant and so Panera Bread wants drive thru. We are doing some high-end Mexican restaurants that are restaurants that now are demanding drive thru. Whether it's a Farmer Boys, even there are other tenants that that I can't disclose that are in the restaurant industry that are also looking through drive thru. It is a mandatory component and when the the the brick-and-mortar store has suffered a lot and it's not just from the pandemic, it's from Amazon. It's from online shopping, so you see Supercenters, obviously Walmart and you got Costco and that sort of thing, but in order for a center to thrive, you'd need to have a customer base that's going to support it. We do have a sit-down component and that's not to say that the QSR areas if if a Cracker Barrel came to town and they wanted that we could do a boundary adjustment, or we can do a lot merger and make it available for them. We would love that. That's a trophy tenant and we would absolutely endorse that, but we can't force a tenant to come in here and every restaurant, we do some development in the city of Poway and San Diego County and outside of San Diego County is a pretty affluent area. Their redevelopment component in a lot of their restaurant, all drive thru. They have to have that drive thru. The other component that is becoming very popular is having dedicated space for Door Dash, Orange Crate, Uber eats because you'll have a lot of conventional restaurants, whether it's Marie Callender's or something like that not only irritates the staff, but it irritates the customer base while I'll wait over there, well, you know I'm waiting for this. So, there is a paradigm shift in the restaurant industry. That we're not, that we're not all acclimated to, so it is a very important component. That's not to say that we're going to try to bring in some inexpensive fast food, stereotypical, but it is an important line item in the feasibility of this project. We would not take this project down. I can promise you that if we could

not develop the out parcels. The development of the out parcels is critical for our primary tenant. Like I said, we do and some of the tenants that are here are very, very admirable tenants that are considering this. But like anything else that we live in a different day and age now, and even for the Trader Joe's of the world, the Sprouts of the world, there is a lot of consideration when Amazon buys Whole Foods and that really makes a big difference. So, we've got to appreciate and respect the demand. Otherwise, the last thing we would want to do is build a generic strip center and then have it sit vacant. It's not good for anyone. So, it is important for full transparency. It is an important component for this, the success of this development and the success of the tenants. Any tenant that goes there, they should just, hopefully clean house. I mean, hopefully they are super successful, and we've got to be able to provide those components that would make them and for what it's worth, the project in Highland, in Jurupa Valley, I'm sorry, is at the corner of Sierra and Armstrong and the folks that are in this audience here are also working on those same projects. While it's not as large as this, we have two outparcels there and the outparcels had been that same corner, high profile corner, had been analyzed multiple times by other developers and had gone through and for one reason or another, and it had to do with the tenants, ended up caving, the project caved. Tractor Supply came there. Tom Merrill, I believe was a director at the time, now Tom is not the director anymore, but he was super excited about Tractor Supply coming to town. So, we did everything to make Tractor Supply. We have two outparcels there. Both of them are QSR's and that's the only thing that actually could make financial sense out of the project and its location and the tentative talks there, I could put out there whether they go through or not is Starbucks and Carl's Jr. So, we don't know if it's going to go through, but that was the only way that it could make sense. At the end of the day, the projects need to make sense, and because they're very expensive to take down, and when we have the opportunity to take a look at the apartments, we're extremely proud. I would live in one of those apartments. We spent a lot of time on the architecture we spent a lot of time, I mean to the point where we almost got angry at each other when it came to color decisions and textures and this kind of thing. So, it won't be the generic apartment project and that's the kind of effort that we are willing to put into this, and that's why we aren't here tonight to be able to say, well, it's going to be this, but I have to have the ability to do that because our financing which comes through either Iberia or Trustmark, which we are one of the largest borrowers from that. They will critique this project more than you guys will critique it. I promise you because they're the ones that are also backing us on these developments, so it that's the long-winded answer. I apologize, but it is important.

Commissioner Miller stated yeah, you know, over the past several years, I think all of the new restaurants that we've had have been fast food based, so you know, I kind of see us getting a little bit out of balance and I know the General Plans intent was to try to keep us in balance and so looking at this development, see that you have two fast food drive-thrus proposed. Could one of those be sit down?

Steve Powell stated well, the one that was on the far right is proposed to be a potential sit down, so that's what that was. The other one, which I can't mention, is in the espresso category and the other one is undefined, so but to answer your question, actually all three of them could be sit down and that is if that's what comes to the table that actually is willing to pay, which quite frankly will be an extremely high price to be in this location because of what it takes to develop the center. I am shocked by the way of what it costs to build apartments in this fine town but that's going through regardless because I think that there is a need.

Commissioner Amaya stated will the apartments, will the cost on those be market based?

Steve Powell stated yes, it's not a subsidized is that question? Yes, it's market rate. That's a scary question nowadays but they will be really cool. They will be really cool. We did have, for what it's worth, we had a consultant that works in San Gabriel and San Bernardino and Riverside and Highland for that matter help us do the analysis on even though it was only 21 units because they thought we were going to do 200 units, what's the best fit for this. I quite frankly was shocked at the rental rates. I mean its horrifying, quite frankly, but it's still less expensive so the whole affordable housing thing is really sort of an oxymoron nowadays, but it will be super complementary to the area. So, I'm excited for you guys to take a look at that, almost more so than the Tractor Supply.

Commissioner Sutorus stated I think having the garages, what you mentioned earlier has really helped me feel it's going to be OK when there were comments about worrying about parking and I guess a lot of apartment complexes will have parking all over the place because they don't have garages, so I do appreciate that you're adding garages.

Steve Powell stated you know, and again not to get off on the apartment but we did spend a lot of time on that. Just again for full transparencies. These are designed as two-bedroom units, and there's a reason why they're designed is 2-bedroom units because I think that a lot of us can vouch for, you know I've got kids that can't afford to go anywhere, so it's young professionals, it may be singles and maybe a couple. They're not designed for families of six or seven. This is not that product type this and that's will also help on the impacts and when you see the design, you'll see it's more 2 master suites, it's a living area, it's got a fully enclosed one, one and a half car type garage with another dedicated out outdoor parking space plus guest parking. So, we have, and we also took staff recommendation, just so you know that we did, we at first were not willing to, not wanting to, to gate it. We are proposing to gate it for various reasons, and one of it is to keep up the standard of that and we don't end up with a transient situation. So, you know we're doing the best we can to respect that because it's also a reflection on the overall development.

Associate Planner Syed stated just really quickly, just to clarify, the conditional use permit covers all this stuff. It covers the residential portion, the commercial everything. The design review that we're looking at today is strictly for Tractor Supply, and there's a residential apartment complex design review application will be brought to you later.

Steve Powell stated thank you. Yeah, sorry about that.

Chair Hamerly stated okay, any other questions?

Commissioner Amaya stated yes, I also wanted to thank Woodcrest. Tractor Supply Company is needed in San Bernardino County.

Steve Powell stated yeah, we think so too. I think that the folks are going to love it.

Commissioner Amaya stated yeah, so the development is geared around Tractor Supply Company and that's good and I think you answered part of what I was going to ask about the apartments because obviously housing apartments are needed. I just wanted to make sure too that the single residence was, I guess that was necessary, meaning leaving it vacant, that lot or just putting a single residence there to complement everything else?

Steve Powell stated yes, first of all, you know, because if you go on Villa Ave right now, it's all, I'm not sure when it was built, but it feels like it's late 70s, nineteen 80s single family, maybe probably weighted average 1,700, 1,800 square foot sort of ranch style homes. We have done a lot of ranch style homes and so we will probably just go ahead and build out that single family lot to mimic. It won't be, oh, we're going to build a 3,000 square foot, we're the biggest house on the block kind of thing. It will be a house that will mimic and if you guys want to review that, I'm fine with that too, but it will mimic what's there. It's just that it's a little extraordinary because I believe the lot minimums there are 7,500 square foot per single family. In order to make the townhome style concept work with the apartments, we also needed to provide individual storage lockers or closets, so to speak, for the the the the townhomes themselves, but we also wanted private backyards, so all of them have their own backyards. They're all fenced in and and so with that it sort of elongates the building and we didn't want to go three stories for a a number of reasons that we don't need to get into, but in order to fit that unit, we really needed to get 23 units there. We ended up with 21 because we could just not logistically make it work any which way and get their parking because it's a queer shape and this ended up being the best layout which really pushed us to steal some of the property from the lot that actually went behind the guys house that is encroaching onto our property, and so every which way we tried to make it work, it was just easier to say mercy, let's give up one of the lots. We'll have an oversized single family, and we might as well just give the other land to the to the neighbor because it it's not going to help us one way or the other, and it's going to actually help him. I think that you know, other than the fact that it's going to be a larger,

it'll blend into the community just fine and all the infrastructure for that lot, by the way is on Villa Avenue so we don't have to like create easements that go into the shopping center. So that's why it's sort of the not apart.

Commissioner Amaya stated just to clarify with the parking, you mentioned, is good about the garages for the apartments. I know on the staff report on page 6 it has the 21, it has 42 parking spaces that are proposed, but it's going to be more than 42, correct? Or it's still going to be 42? The reason I bring that up is because two bedrooms usually has let's just say three or four people, everybody has a vehicle nowadays and if you have 21 apartments, two vehicles per 42, I think they'll be a lot more than 42 basically. That if there's a lot more parking needed that people would start parking, whether it's on Foster right there to the South, I think. Is it going to be sufficient parking for the apartments because if not people would probably start parking on Foster, I assume, that's the closest right there.

Steve Powell stated yeah, we analyzed the parking matrix and again our architects is here but so we complied with the parking matrix, including the guest parking requirements. So, we have that, and I don't remember the exact totals of what it was for the apartments.

Assistant Community Development Director Stater stated if you go back to the to the chart. At the bottom there 11 guest parking spaces.

Commissioner Amaya stated yeah, because my point was that everybody has a vehicle. If you get two or three or four people living in the town home or the apartment, then it's going to be a lot more than 42 vehicles.

Steve Powell stated yeah, and so in order to accommodate more, we go, I'm sorry, go ahead.

Leonardo Dale, Architect, stated so let me just clarify here. Overall, on the residential side we have 53 parking spaces. So, we have the additional 11 parking space for guests.

Steve Powell stated within the center or the apartment.

Commissioner Amaya stated yeah, because even if I lived on Villa, or Foster or round there, that one thing that..

Steve Powell stated I honestly, honest to God, and I know that you hear this from all kinds of different developers we do, I've served on the county San Diego for 14 years. The form-based code committee and if anybody is familiar with form-based code, there's things about it that are really, really great but there is a lot of things about it that are fantasy. We've got provisions in the form-based code that says, hey, look at you know what we can get rid of parking altogether. They're doing that in in the City of San Diego right now because

everybody is going to walk to everything, so we know that that's a fallacy. In order to create more parking, we have to reduce our footprint on our building and that was one of the compromises which again, because we were going to address this next month but the garage space itself, that footprint takes up valuable square footage, but we also feel that that's an important part of that. Again, we're trying to focus to the young professional, or you know, the couple. So, it's a hard balance, but yes, thank you, Leonardo. So, we do have that additional guest parking.

Chair Hamerly stated I do have one kind of macro question and it focuses or has to do with the overall concept of the Town Center and it's not isolated just to your site, but it created a district in the General Plan where the ideal vision was that all these disparate parcels would kind of work together, have cross lot circulation, create a pedestrian district to kind of give Highland what it sorely lacks right now and that's a downtown. My biggest concern, if we can go back to the the site plan. The site plan looks kind of carved up where it's just four separate blocks that, while there is a blue line that connects them, there isn't a flow and that flow that I'm referring to is the flow that extends to Smart and Final, Dollar Store, and Bakers. All of those properties to where it looks like the entire thing was master planned and I know that's not a fair comment because you're dealing with what's leftover and it's an infill project. Which does put a heavy burden on you to how do we stitch all this together and make it look seamless so we're carrying through the vision of of what the City of Highland was dreaming of 16 years ago now. And I'm not seeing that, so I guess to get to the question. How did you arrive at the overall site plan and the internal circulation and the network effect to cross lot circulation?

Steve Powell stated that's a fair question. We actually had that that that same discussion up in Forest Grove, Oregon, on another project that we work up there where it was, they had what was called NMU zoning neighborhood mixed use and it was not a very large piece of property. It was sort of the last remaining piece and that element up there ultimately, we put in two years into that project. That project ended up getting cancelled because it just could never, it could never be stitched together like you said. So, I'll try to answer that the best I can because early on staff had mentioned that and they actually one of the first exercises that we did was drive around the City of Highland which they said hey go from this block to this block. Take a look at the architecture, take a look at the and we did go down to the CVS and we looked at the kiosk and at first and I got to be totally and I'm totally honest so this is not to offend or but I looked at the kiosk and when I looked at the little signs at the top there I thought that they were like it was a restaurant menu at first glance. In fact, one of them looked like an advertisement for something, so I didn't know what it was and then I also saw that there was some damage to the end because I serve on committees myself personally and we have to address this and and they always start out as the good idea but the good idea then who takes care of it and it ends up just going on deaf ears, so when it came to the circulation we didn't know much about the whole historic nature of that and that trail and we played with different scenarios. That's where we came up with, at first, we were going to actually mirror exactly the plaza at Smart and Final, which

I think everybody is familiar. It's got something in the middle and it's got benches and it's got some canopies but the functionality of that, honest to God, we've come out here 15 times. Half the times I've seen people sleeping on the benches out there, I've seen shopping carts out there and I'm just going okay because we are impacted by this in our own community. So, we try to, this plan doesn't reflect it, but on the landscape plan, it's a little bit. We've got more of a landscape component here, and we've got some benches in here. We got some benches in here that suggests that the pedestrian can go I want to sit down and I'm going to rest for a minute and then I could go into the plaza. So, the sense of entry, which is very important to me is this element right here. What does it exactly say? You folks can tell us what it should say, but that I think symbolizes there's the trail instead of putting a kiosk randomly within the development so the development itself...

Chair Hamerly stated so just to interject, before you leave the the corner statement, plaza and and move on to the the juicier elements of the plan and this is just my own opinion. The plaza on that location at that corner is really not a desirable element because when we talk about the communal spaces, the gathering space is the opportunity for congregating. On a macro sense, that would be the last place that anybody would want to congregate because you're right there at the corner of the intersection, it's a fairly busy intersection, so if you want to relax in the shade and have a conversation, you'd probably want to be more than 20 feet away from traffic that's going pretty fast, so yes, it's an opportunity, but it's not an ideal location for that proposed use. It's more of a gateway statement saying here is the development, let's make it look beautiful, but the real space for congregating and relaxing is going to be in a more controlled, sheltered environment within the core of the site.

Steve Powell stated right, so when we looked at what is our opportunity in order to make this site work? One of the givens was this, right here, we have to have a circulation element coming off of Church. In the ideal world, we wanted to push that up, but we couldn't push it up because we have to make it in alignment with the Smart and Final driveway right across the street. So that was a fixed element, so it's already defined that we have this pad right here to work with. That is, that that is more of the high dollar per square foot exposure on the corner and and in our Performa to make this development work, we have to assign different values to different areas. This back here could be, I can't disclose what it could be, but it's a grocery type store. If that doesn't go, it could be an apartment project, I suppose, but the Tractor Supply takes up this kind of footprint and quite frankly it could even take up a larger footprint if we brought in a larger model. This area back here is disconnected, quite frankly, it's the leftover piece from this here, so we have got to extend this road. We have to put this because we have to have a way to get into Tractor Supply plus we have to provide internal circulation for the largest delivery truck that pretty much is on the road which is a WB 67. So, we have to have a way that they can safely get in, they can safely turn around. We don't have a concrete loading dock, we have a mobile loading dock but just the same, that helps drive

this site plan. Then when it comes to the internal circulation, admittedly our first iteration was similar to this layout here, except we had this front piece divided into two. We had a QSR or drive thru here and a drive thru there and the way this element worked because this intersection really does balance itself the way the stamped concrete is, the way the curb returns are it is pretty balanced. So, it lends itself to having something that sort of mirrors what's going on over here to begin. So, when we redid this iteration here, this becomes the sit-down component. This area right here, it's sort of hard to focus in on is the sit-down area. This is the sense of entry, that's why ours has more landscaping and it's the sign once you go under the sign that is the opportunity, right there, that sidewalk connects up to a sidewalk, and there is a sidewalk that circulates all the way through here in front of Tractor Supply, comes down here and connects onto you can see where this is. That's the the the sidewalk that comes off the Dollar Store right there. It connects onto here, so everything here does circulate within and that's the way we were able to solve it for the tenants that are considering this. Is this a site that's large enough to have an amphitheater? If it was 50 acres or 40 acres or something like that, possibly, but as it is, it's difficult to get these things to pencil in. State said well look at giving up an acre for a public use because we faced that in Forest Grove, and we went all the way to Planning Commission. Planning Commission approved it up there and then a local group appealed it because they wanted something more and more and more, and then it ended up killing the entire project. So, at the end of the day, that's how we addressed it. We have the sense of entry here. We have a potential undefined sit-down component right here because that's a patio area out there that you know walks over to here, walks over to here, ultimately walks throughout the development. Then then we have, you know, a larger tenant back here. So, it may not be exactly what you know the forefathers had envisioned. It's what we could make work on a 10-acre site.

Chair Hamerly stated so which would you regard as your primary point of access in terms of when you enter, you know you've arrived. Most people are going to arrive by vehicle obviously. So, which is your primary point of access?

Steve Powell stated well, for if it's for Tractor Supply. It's right here. If it's for the undefined grocery store. I'm going to go down Church signalized intersection, I'm going to hang a left here, go into the parking lot. I'm going to shop and then I'm going to go. That would be it. If it's for a restaurant here. I could make the argument it's a half dozen one or the other, but if it was me and I was coming off the freeway, I'm going to hang out right here on Church and I'm going to come into here and then I'm going to go into this center. If I'm walking and I'm strolling, it's probably this intersection here. There is a sidewalk, there is connectivity here but that just feels like it has more of a sense of entry. I'm not sure how many people walk down the street and walk up into the Smart and Final that area. I'm not sure but, I think it really depends on the tenant and what you're going to that center for. I mean, that's the way I see it.

Chair Hamerly stated if I were speculating, I would say that if you look at the population of Highland, you're probably going to have a bit of foot traffic coming from the north, but there's not a lot of population center up there. Your population center is going to be probably 3 to 4 miles to the east, and then you do have some that would be crossing Base Line because there are quite a number of homes you know between that Third and 5th Street Corridor and Base Line, but the vast majority Base Line is a key arterial within Highland, and so that's where the majority of the people are coming through. So that left in, left out on Base Line, I agree that's probably your main axis coming into the project, and so that's where you're making your strongest statement. So that being said, Tractor Supply does have a frontage on that kind of says welcome, but if you look at the other side, the east side of this project, you're fronting a loading dock and you're fronting the backside of the house. That is the backside of a drive thru, so there's really no presence. So, if you look at your large commercial retail tenant, you've got the loading dock there that fronts your major arterial, and then you've got the drive thru and you're basically looking at back of house. You might get some signage on there, but that's a drive thru so you have a queue of cars and there's kind of a deficit of landscaping along your main arterial there. So, the part that concerns me is the presentation of the project as a whole. I think Tractor Supply respects that axis, but the rest of the site plan kind of breaks down on that major axis.

Steve Powell stated I understand what you're saying, and I can't say that I disagree with it. The challenge that we're faced with right now is that we have an undefined tenant. So, what we have to do in order to establish the highest and best use is, say, okay, well, we've got a store. There is a store that this is a prototypical you know plan now, can we shift it? Yeah, we can shift it but then this parking field becomes almost on because this is a given right here. This is a given, so in order to get the trucks to circulate and that sort of thing, all of that element goes to the north, so I'm not even sure that this will even go through, and again, that's why I tried to make the statement that each, call it phase three and four, this section right here will be more in depth scrutinized when an actual application comes to the table, because if that ends up being an apartment project or it ends up being a Michaels or it ends up being something everybody got a different criteria that I hope can be more scrutinized at that point. But because this is a CUP that covers the whole thing, we had to have a conceptual jumping off point and that's why those aren't really being scrutinized at this point.

Chair Hamerly that's why I'm dealing with kind of the 30,000-foot view. So, if we carve it up into the major circulation elements and your major pad elements without getting into the minutiae for each of the pads, that day will come. I'm just saying that if if we know that those are your major arterials and we're trying to present the best face of the project as a whole then why not carve out at least some slivers where we say we want to do some special landscaping because this is a gateway element, we don't want paving right up to the here. You know you're going to have an east/west axis through there, a little bit broader parkway because you know you're going to want a 6-to-8-foot walkway because that's your major circulation

point. Put another four to five feet in there and say we need some trees because we got to dress it up.

Steve Powell stated absolutely I understood and actually totally agree with you. I know that Leonardo, we had this conversation, so to speak, because we talked about this whole loading dock, but I don't want to say that we didn't give it a lot of credence because we don't have a commitment yet, but I agree with you, and I can go on the record.

Chair Hamerly stated it's a set aside at this point.

Steve Powell stated it is a set aside.

Chair Hamerly stated we know that that's a goal, so let's address that.

Steve Powell stated and one of the things that we we started talking about, but then we were talking in fantasy language, was well, yes, theoretically in this particular configuration, this is the front of the store here, and we've gone down this path. You can take a look at the Ramona Tractor Supply under form-based code, same kind of thing. The side of the store faces State Route 67. That's the entire side of the store was designed as a western town with fake facade. It looks sort of like Disneyland, in order to address that. So, we thought, well, we can elevate this side to make it look like the front in order to respect this particular tenant, which we don't even have yet. So, we may have put the cart before the horse as far as trying to define things so definitively, but we also were under the impression that if we were proposing X number of square feet here, we need to demonstrate to the Planning Commission and to Staff that we could accommodate the parking that we could accommodate the landscaping, the shading requirements and that sort of thing. But as far as screening, landscape, or parkways or however you want to describe it. I agree, and I hope, and I would respectfully request that we could scrutinize that level of detail at the time we present those outparcels.

Chair Hamerly stated the only reason I bring it up at this point is because it is a CUP and we're kind of blessing the entire concept without getting into design review for the fine details.

Steve Powell stated understood.

Chair Hamerly stated but we do have to address the overall macro issues and the CUP is the venue for doing that.

Steve Powell stated and for the record, if, like Associate Planner Syed said, you know the design component right here really refers to Tractor Supply and so that's fair game for however we need to address that, but certainly we will respect that and we will ultimately have to work with Staff again when it comes

back to whether we do all of those at once or one at a time. Obviously, there's an economy of scale there, and we really need to be able to master plan it but we also, not only for potential tenants, but for lending institutions and backing and even for Tractor Supply themselves, we have to prove and for Staff that this is a believable concept. I mean, even, and it's interesting, the City of Highland, which when I heard this requirement, I heard it from our civil engineer to begin with is like, oh, you're going to have to prove stormwater, and I think, Oh yeah, conceptual. No, no, no, no, you have to get stormwater approved prior to and at first, I'm thinking are you kidding me? But the more you think about it, it makes total sense. It makes total sense to be able to address an infrastructure that really wasn't respected 20 years ago and as such that also comes back to well, what are you going to build there? Well, we've got to fantasize something, and so we have got this to where theoretically that could be built, but it can't be built because we don't have a tenant, so we address it as much as we can to make it as believable as we can to make sure we're crossing t's and dotting I's knowing that call it parcel 1,2,3, and 4 are not being approved as a project. There are being approved as a buildable commercial site, and that's what we're looking for the overall CUP. We would have done the same thing on the apartments, but we've put a lot of effort into the apartments because we understand that tenant, that tenant is us. That tenant is we're going to build it, we're going to own it, and this is going to be our project, so we can put a lot more energy, effort, and money into that. But we're not going to speculate any commercial project, especially in this day and age. It's suicide, so we have to do something that's going to be highest and best use. That will respect what the market is demanding, and we'll also respect what the lending institutions will say. Yes, I'm willing to put millions and millions of dollars into this location because you've got a solidified plan and we also have got a reputation. We build quite a few projects every year. We've got 70 that will be completed this year and with that there's a lot of chiefs that we have to answer to. So, we take this very, very seriously and we also do not want to paint a picture for you folks saying that, oh yeah, this is great, we'll do whatever you say, but at the same time we have to be able to present something that we believe is going to work. So, we know that those projects will be conditioned upon other scrutiny, other discussions, other modulation, but we also know that the driveway off of Church, that's a given and the driveway off Base Line is a given. So, however, we can make it work and we hope that Cracker Barrel will come come to town. We hope, but we can't promise. We can promise Tractor Supply though.

Chair Hamerly stated any final questions for the applicant this time? Thank you. This is a public hearing, so at this time we'll open up the public hearing for discussion. I recognize a lot of faces in the audience, and they look like consultants, but I don't have any speaker slips, so if anyone wants to participate, now is your opportunity. Okay, we'll get started with our discussion and leave the public hearing open. So, this is a multi-part application. One of the macro elements of course is the General Plan Amendment, GPA 21-002. This is an advisory role the Planning Commission is making a recommendation to the City Council, and

this is to make an allowance for Drive-thru uses in the General Plan Town Center. So, open up the discussion at this time for the GPA.

Commissioner Amaya stated I support it at this time.

Vice Chair Thomas stated I know that all residents in Highland really want to sit down type restaurants, but I also recognize the changes this year with the pandemic and the need for drive-thru, so that's where I'm kind of conflicted about it. Knowing everybody really wants restaurants in Highland, that's what the public here in Highland want and that's who we represent. Perhaps the public has changed with this pandemic, and they're no longer wanting those restaurants or it's no longer feasible. The business has changed like you so eloquently described. So, I appreciate that and I'm really sure quite how I feel about that yet. There's something between those two that I can't yet rectify in my brain. How to move forward with that?

Commissioner Sutorus stated I could understand where you're coming from, and I think the pandemic changed the business model. I don't feel like we can't have both. There's a lot of great restaurants, like they mentioned, Panera has a drive-thru now because there is that economy of demand and deliver, and everyone I know in Highland does demand and deliver from time to time, so I don't see taking away a sit-down restaurant and having a drive thru, I mean they don't have to cancel each other out. I think you could still have a very nice restaurant with a drive-thru that we would go to and sit down. This location specifically, I mean, it's a good project for Highland. This land has laid vacant for how many years, and we have never had an opportunity to have something like a Tractor Supply store come here. So, I'm excited about that focus. The details of the rest of the project will have to work out when final. I think there's stuff we could do to make it a really nice design, when the next phase comes in, but I mean when I was on our once we called, what was I, a vice president of the Chamber for a brief moment in my life, I had this vision of what we could do with these businesses on Base Line and I remember the Executive Director told me really, Jessica, where we going to go to the Dollar Store because I had worked in Santa Clarita and they had a model of economic development where they would do events. The City would host events to get people to come to businesses in their downtown areas that weren't, you know, the fanciest places or whatever. She kind of squashed my bubble, but I could actually see this now, with this project which didn't exist before, so I know it takes some envisioning and it's scary to approve new things, but honestly the project itself for Highland is a good project and it's going to bring better stores because the anchor is a good store. So, I do support the project and I believe we could have both. I know you guys worked very hard to try to get good businesses to Highland and I hope that this development will help attract a sit-down drive thru restaurant.

Vice Chair Thomas stated I agree that the Tractor Supply has the potential. Unlike other businesses to actually attract some decent other businesses to come in. So,

I do agree with you wholeheartedly on that. I also really like the apartment design, how you said it's kind of just separated out. I think you guys did a great use of space there in that location, for phase two. I think it that works along with that residential area, I like that. I like the garages underneath.

Commissioner Amaya stated yeah, I think one thing that businesses are they have to be flexible. We have another variant you just don't know where the pandemic is going, they can shut everything down. They need to have that flexibility drive thru and if that happens, yeah, because they would be, they have to make money. That is the main thing. Tractor Supply has to attract other residents, tenants, and if you shut that off, that's not going to happen.

Commissioner Miller stated I think the General Plan was developed with a certain intent and I think that's just strike a balance in the city. I think we're a little bit out of balance right now, especially as it relates to drive-thrus. I like the project. I'll just have a hard time supporting any further fast-food development in the City of Highland.

Chair Hamerly stated yeah, that's the tough balance I'll state right up front that I enthusiastically support the Tractor Supply application. I think it's a terrific tenant. It's a wonderfully run company, immensely profitable, and it definitely has carved out its niche. The biggest challenge I have is there are not a lot of locations in the city where we have the opportunity to create town centers or projects on a main axis within the city. I know all of us have spent a fair amount of time driving up and down Base Line over the years, and there really isn't a core. It's just a bunch of separate little infill parcels that have just organically developed whenever a plan comes along, but there's nothing that gets it together, and I think that is probably the chink in the armor of what is keeping Highland from being, you know, just a really outstanding community. I think it has a lot of good pieces, but it lacks a downtown or a heart or a core. That was the primary focus of that Town Center concept and so you know, it's really tough. I completely appreciate, I mean, every sit-down restaurant that I've been in for the last year and a half has a takeout component, You know half of the lobby space, or the waiting area is for Door Dash and Uber eats and all the rest of them for the pickup, and they're adapting. Whether we need to go the whole nine yards and say it needs to be a drive thru or just a drive up or dedicated parking for short term. I think there are a lot of different models out there that that seem to be functioning. I think Highland doesn't have a deficit of drive-thrus. I think we have a deficit of drive ups, take outs, dining in. So that's kind of the balance. I know that we're not doing a design review or a hard review of that southeast corner of the project, but we are tasked with making a recommend to the City Council on whether drive-thru dining would be appropriate in the Town Center and for me, that's a tough one, because I think there are some hybrid models out there that are equally effective, and maybe the compromise is if we're going to create three tenants in that space. Let's say one of them may be the one on the the westernmost that has the best access coming off of both of those key axis going through the project. You know, maybe that's the one that we say it's

okay to do a drive thru and the rest of them are the hybrid model. We say we want a dine in component. We need to have enough parking for the temporary parking in the takeout component, but to say two of the three are a drive-thru, that's giving up a lot of landscape, a lot of outdoor dining, a lot of amenities for paved queuing for vehicles and if we look at the goal of the Town Center, it was to get everybody out of their vehicles, get them to a destination, say park your car, spend some time, have an outing with the family and and have an enjoyable afternoon or evening. So that is a a tough one there. Unfortunately, it's an all or nothing because we can't say okay, we're going to do stages of how much drive thru. You either saying they can do it, or they can't. That is an all or nothing proposition and I think to make it work realistically we have to say it's a workable model. Is the directive to say minimize it because we still want to have that goal. So, I think all of us have had a chance to weigh in, and hopefully, you know we can give it some careful consideration before we take the final vote. But moving on, do we have any comments or observations about the mixed-use concept? I've heard nothing but positive about the mix of land use that's proposed with this project and that would be the purview of the conditional use permit. Okay, then we'll move onto the let's see. So, we've got related entitlements. We have the tentative parcel map that creates seven new lots. Did anybody have any comments on the tentative parcel map that was created? One question for the applicant. Three of the parcels make really good sense. The three parcels that are created at the southeast corner, the lot lines, I'm sure there's a reason for it, but the lot lines look really broken up. Is that tenant specific, is it design specific, or is there another reason that we're breaking those up the way they are and there's all kinds of jogs? Are all those property lines going to be self-limiting if one or more of those tenants' bails.

Steve Powell stated the way the property lines are, are not designed specific. It was driven by parking requirements and so the parking requirements, for like the one in the like, you said on the far west there, the purple one based on the size of that store and the way it circulates. In order to accommodate, you know a dumpster and the turn around and that sort of thing. That's what drove it to be that odd shape. Same thing, same thing in the middle. Again, based on this square footage here it required this much parking. Again, we have a very popular coffeehouse that actually has got an extremely small footprint, but so that would really drive to minimize the parking, but they've got a large queuing requirement. Now whether or not they come to fruition, they're out of the Pacific Northwest. It would be a great addition. They haven't committed. So that would again drive the footprint. Once we get us a tenant commitment and again whether that is two drive-thrus and one sit down or one sit down that takes up the entire, a Claim Jumper, so to speak, that takes up the entire block, then we would end up either merging the lot lines, because obviously we couldn't build over the lot lines.

Chair Hamerly stated that was my next question. Depending on the tenant mix, would you have to then come in and say oh, we're amending our tenant tract map.

Steve Powell stated yes, we would. In order to make this pencil, so to speak, because I know people don't like to talk about the financial component, but we have to talk about the financial component because if it doesn't pencil then the entire project is cancelled. I mean it's not one or the other. We won't speculate, so we have to do something that we can prove is feasible. Now, whether or not we get this tenant here. But if we did get and I'm just throwing a Cracker Barrel out there, if we got a Cracker Barrel, chances are they're going to take up the blue and the purple, lot lines are merged and then you know all discussions are over with. We'll never be able to have a drive-thru component on the corner because it's just the way it's configured, so this is our opportunity to say hey, bank, this makes financial sense. We don't have committed tenants, and that's an honest to God truth. We religiously attend ICSC, and a lot of other commercial trade shows and we work with a number of tenants and half of which you probably have never heard of because they are in the the deep South and they're in the Midwest and there is a resurgence of interest in California. Going through the entitlement process. Down here has been difficult, not in the City of Highland, to be honest with you, but in areas like San Diego or parts of Riverside County but the tenants don't care about that. They care more about what's the population base and can we make our model work. A lot of the tenants that we work with nowadays and Starbucks is one of them, their footprint has totally changed, and it has completely changed. Not just based on the pandemic, the pandemic has changed a lot of things, but Uber Eats, Door Dash, dine-in and that has changed a lot of things to the the model of the sit down does work in a lot of areas, but it has been tragically impacted. In our own town, we've lost 17% of the sit-down restaurants that will never ever come back and so we have to, as businessmen, as developers, we have to respect that. These lot lines are fluid, but the lot lines demonstrate something that could be.

Chair Hamerly stated so, in breaking up the lots the way that they've been drawn up on the tentative tract map, would there be a possibility of any one of these tenants coming in and wanting to purchase that parcel, or you're retaining ownership and it's going to be a lease only?

Steve Powell stated there's always the possibility of certain tenants want to own. Most tenants don't want to own, they want to lease, but they're not real estate companies. Tractor Supply is one of them and Dollar General is another one of them, but there are some corporate tenants that are very, very popular that want to own their own real estate. But that's really the minority.

Chair Hamerly stated so just to kind of free your hands up on this if we're not creating, you're looking at a master development here. That's a conditional use permit that's dictating all seven parcels. So, if we say that the primary timeframe of usage for Tractor Supply is not going to be the timeframe for usage for the southwest corner. Sorry, southeast corner, you'd have a joint parking agreement and saying everybody uses everybody parking except for these handicapped spots and this staff parking here. But overall, the site is one site, and you park wherever

you need to park during the various hours that these various businesses are in operation. And then you don't have to have, you know, lot lines to carve out another two spaces for this so that this parcel right here that is purple has enough parking for their particular building. Does that free up your hands to clean up the site plan?

Steve Powell stated yes and no, and the reason why is because of the way lending institutions look at ownership and because if it is sort of like buying a condominium versus a single family. You've got common area exclusive use, but you also have fee simple ownership and we're going through that right now in La Jolla, where California Pizza Kitchen wants to segregate itself off from a very, very affluent shopping center and it has everything to do with blending and mixed use in the redevelopment of the La Jolla market. So, while it would be great to say that this is one large apartment site, it doesn't really work that way in the real world, Tractor Supply is a very good example of that because like realty income, which is a REIT that which will buy up a lot of these. Institutional buyers will buy these things up for investment trusts and that is part of the financial portfolio and the feasibility analysis of a project like this. So, for example, if Tractor Supply had its hands tied, I can tell you right now the entire project would be off to where it could not be segregated out as a fee simple purchase. It's the way these projects are funded too.

Chair Hamerly stated so you're saying a joint parking agreement that would be to the benefit of all all tenants and kind of free up the hands of the three parcels that are on the South would not be practical?

Steve Powell stated no, no, a joint parking agreement, is and I don't know how to say this nicely, because Tractor Supply is a great tenant, but they also don't like to share in a lot of things and we we have to work with their lawyer's day in and day out because there's liability issues and they have a battery of lawyers there that scrutinize every square inch of the project. So, when the more we share in common, and the more rights that the general public has, the less desirable the project site becomes. So, fee simple ownership and this kind of thing is fine. You know that that's what they would ideally like. In Jurupa valley, their parking matrix out there is, I have never seen one so high. It's in incredibly high. We have a shared parking matrix with three parcels. The QSR's and Tractor Supply in order to make the parking counts work. The way that project is being developed also is a phased approach. Tractor Supply is constructed first, but the parking lots for the out parcels are not constructed until those tenants are going to build. In other words, there's some communities that we've been in where they say, well, if this was the real plan where we would have to construct all the infrastructure and all the parking lots and the only thing that we would be left with is this little pad here, this little pad here and this little pad there, but it doesn't do anybody any good because that eliminates all the other tenants. I could also make the the argument that we don't need to construct that right now because there's no impact, there's no demand for that additional parking, because those those stores or restaurants or whatever they may be, aren't aren't constructed at this point. So, there's always

going to be cross parking. Nobody says that you can't park over here as opposed to there. From a legal doctrine standpoint, it does get a little bit more complicated. It's the same thing with easements. Easements become a difficult thing for a company like Tractor Supply to swallow because it's a publicly traded company, and so they're scrutinized at a 30,000, 100,000-foot elevation where they look at all of us as in one box. So, I'm not sure if I'm answering your question there, but a shared parking agreement which I'm not sure if we need a shared parking agreement, but there are no restrictions on a Tractor Supply customer and parking on, you know, a Cracker Barrel parking lot and vice versa. Yeah, it's the same thing the way the whole site circulates. I don't think the pedestrian understands that, but from an ownership standpoint. It is important for our tenant to be able to be on their own parcel, hence that's why we're going through the the subdivision portion of it and that's also why that the institutional lenders that look at these things look at them from a fee simple. They'd much rather own a tract of single-family homes that they're going to rent out, as opposed to a condominium complex.

Chair Hamerly stated yeah, that comment was just directed solely at lot lines and how clean the math looks when you're trying to describe it and saying, do we really need to show every single parking space tied to a certain pad when we really don't know how big the pad is. You could conceivably now come back and say we're going to have to do a lot line adjustment 3 separate times.

Steve Powell stated absolutely, and there's probably a greater chance of that happening than not. In all honesty, I mean, but I have to start somewhere. I have to be able to say I can put a 3,000 square foot QSR here or I can put an 800 square foot QSR here and I can have a 3,200 square foot sit down restaurant and then I have to prove all the ancillary issues that go with that, the circulation, the parking, the handicap. Where's the dumpster? How does it connect? So, we've sort of designed a fantasy plan that sometimes is very frustrating for us because we start to get in the weeds on a project that really isn't is right now, but we have to plan it that way to show that we can make it work. Not only from a planning perspective standpoint, but from a land acquisition standpoint and infrastructure standpoint and an impact, you know, fees standpoint, so we've struggled with the apartments, believe me. We've struggled, but the impact fees that are associated with the apartments are greater than that of the Tractor Supply. It makes you question, so as a result of that, we put in, even though we're sort of architectural freaks to begin with, we put in a lot of effort to make sure that those apartment units can command the rent that they need to command in order to justify the the development itself. So, I know that that's again off topic. Yes, lot lines can be adjusted. Chances are they will be adjusted. Do they need to be shown that as individual fee, simple ownership lots?

Chair Hamerly stated okay, thank you. Any other comments on the tentative tract map?

Commissioner Miller stated quick question, per parcel, R1 does include the resident's, correct? Right up north of the apartments right there. I see parcel R1 that also includes the home?

Chair Hamerly stated no, R2 is the single-family home.

Commissioner Miller stated okay, R2, because I didn't see it on there.

Commissioner Miller stated yeah, the single-family home is technically not a part of the CUP or anything, but it's part of our land acquisition.

Associate Planner Syed stated just to clarify, the CUP is with regard to everything except the single-family home.

Chair Hamerly stated everything color up there. Okay, so moving on from the tentative tract map. On the site plan and we'll focus on the design review portion of the application, so we'll focus solely on the Tractor Supply parcel for these discussions, and we'll begin with the site and combining that with the parcel map exhibit 10 and then the site plan exhibit 1. Another question for the applicant, during the presentation you'd mentioned that there was a potential future phase that dealt with the enhanced garden center, and I'm assuming that is not changing the size, but it would articulate it a little bit more refinement. So, I'm thinking we're adding some additional landscaping around the perimeter.

Steve Powell stated again, another unorthodox thing about the City of Highland is I talked to Community Development Director Mainez because normally we come with our own PowerPoint and come without lots of Color boards and this kind of thing. OK so Tractor Supply like a lot of the tenants, every year they seem to dream up the new items that go in their store and a couple of years ago they came up with a pet wash and at first, I thought that this is crazy. You know people are going to bring their dogs in here and it's like a beauty salon for two dogs at a time and and it's a beautiful set up within the store and it ends up being a pretty popular feature. As such, Tractor Supply has a garden center, the garden center in the standard criteria plans was 15,000 square feet for the longest time, and it would include a forge shed in the event that they would sell hay. It doesn't happen every time, but it's an enclosed structure and again the items that would be in we call it the FOD, fenced in outdoor display, however it's fenced whether it's wrought iron or chain link. Our items, like I said that are typically too large to be inside the store or it requires a pickup truck. Each one of the FOD areas has got a drive thru and that's what you see in the middle of the yellow area there, and that allows customers to, if you take a look at this, on the parking field here you'll see a typical tractor supply has three 40 foot long parking stalls and that is typically for a pickup truck with a horse trailer, a pickup truck with a little flatbed trailer or something like that. Then those customers typically will go into the FOD area here and they may buy fencing material or pipe corrals or that sort of thing that's rather large. They pay for it in the store, they come through here, they drive through and then they

exit out the back. Again, that's all reflected in the circulation plan. Last year, I think it was last year, Tractor Supply decided to because they also have a seasonal fruit tree and seasonal garden center. And I guess, another outfall of the pandemic is people started planting more gardens, and as such, and this is reflected nationwide. That garden supplies sort of like what you would see at Home Depot or Lowe's became a lot more popular and so as such they came up with a garden center plan and again for full transparency. They would hate it if I said this, but they came up with a greenhouse type garden center that affixes to the side of the building so it almost and you may have seen them in different parts of the country. I've seen them at Lowe's where you may have this beautiful building then all of a sudden you literally have a greenhouse type structure that is a series of gable roofs. I think what they did was, they worked with a manufacturer that says hey we can build these, and you can just pop them onto the side of your store and believe it or not in a lot of part of the country they just don't care about that. It's like yeah, sure, slap it on there. Well, Tractor supply has discovered that this is a very expensive element, especially in areas seismically challenged like Highland and in addition to that for those communities that do have more of a concern about the architectural style. Again, standard criteria for the Midwest, you go into Mississippi, you'll find this store is a pre-engineered metal building corrugated siding and you call it a day. So, a garden center there may be appropriate. Well, here we knew that this was going to be a challenge and in order to make that garden center fit in with the architectural style of the store, we had created that section and right here, and I'm not sure if you can all see it. It's on page 6, I'm sorry, of the packet there. What we added was in the area where you see the wrought iron fencing and the columns here, we added a facade that respected the architecture of the store that encapsulates what would be a greenhouse structure that you don't see because it's all behind this this element here. So, the challenge that we have is that when we find a location, we go through an exercise. It's a real estate committee exercise where we have to show how the site is going to lay out. Show how the truck is going to circulate and then show how we're amongst a bunch of other things. How the garden center would work. The garden center is constructed based on whether or not the market projections are going to justify the additional cost release and if the lease is not justified, then the garden center wouldn't be built, and it would be your traditional FOD like you see at every other tractor supply. You won't see a lot of these garden centers, because they haven't been constructed but they have to be planned for because that is the demand of a publicly traded tenant. Now they may never come to fruition. As such, we can't be held in jeopardy because the lease is based on very, very tight budget constraints of building this building, building the parking lot, taking down the entire center. You know how the whole thing is going to be master planned, and that's how it's devised now, whether or not one year from now or 10 years from now they end up building this component. It is a requirement of our lease that we at least get the conceptual plan through the entitlement phase. Just much like the same way we do with forge sheds. If a forward shed component was going to go in there, there's a whole different forge can shed that is totally different than the traditional one in this. But if this was going to be built, the entitlement portion of it has to be done, because if tractor supply

justifies building this, they have to pay for it and they don't want to have to come back here and go before you folks and this sort of thing, with all due respect, they want to be able to say, oh, let's go ahead and get the project structurally engineered and let's go in for our building permit, so to speak. But they don't want to have to go through the entitlement process, and it is very important for them to be able to have that option. The way it would be constructed is the way we are proposing phase one, because there isn't enough justification based on their sales projections to add. This is another one and a half million-dollar component, and they just can't justify it at this point, but they need to have it in time.

Chair Hamerly stated point the drive through on that. Yeah, I can see it.

Steve Powell stated yeah, so the drive through is right here.

Chair Hamerly stated okay, so it's the large central element, so that's an open gate.

Steve Powell stated yes that would be an open gate that would look just like the rest of this. It's right in the middle.

Chair Hamerly stated and the three Gables that I'm seeing on the rear elevation connect the element just to the west of that center area.

Steve Powell stated that's correct, yes. So, these are hidden in this, but they don't go all the way. It's a little deceptive here because this is set way back. It doesn't go to the back of the building.

Chair Hamerly stated so, the two Gables that are to the left of that rear image, right there? Those are not the two elements that are in between the Tractor Supply, which I'm assuming is the rectangular portion there and then there's three Gables and the last gable, on that lower picture, is the drive thru element, correct?

Steve Powell stated yes, it is. Yes, you're right.

Chair Hamerly stated okay, so there are three Gables running north/south parallel to the western facade of the proper Tractor Supply building.

Steve Powell stated what you see, so the brick, the actual retail stores right here from from here to here, these facades are designed not only to mimic this but it's to mask the gables that are up front, and they start small, and they get a little bit bigger in the middle and they only go about halfway through the FOD.

Chair Hamerly stated okay because it looks like they go all the way back. So, I'm looking at a facade right there, that does not connect to the roof, it is the gable on the rear elevation.

Steve Powell stated yes, they it does. It connects up to the side of the store.

Chair Hamerly stated but the gables are running north/south the length of the building.

Steve Powell stated north/south, but not all the way to the back. Not all the way to the far north. I forgot what the dimension, Leonardo do you remember what the dimension is on that and and again we haven't constructed a whole lot of these. This is a new element. The first two that we're doing is Jurupa Valley and here. This has been an absolute challenge with our tenant because this element to build this freestanding element can't rely on this structure, so it's an extremely expensive element, but we have to have it in the entitlements. If I was betting on this, I don't believe this phase will ever be constructed. That's my own opinion.

Chair Hamerly stated be that as it may, it's a design review application and we're entitling, so I'll cut to the chase and and let you know what really bothers me about the north elevation. The front ties together beautifully. No problem. It's presenting itself well to Base Line. You could make just as much of an argument that you are also presenting the rear of that building to all of your apartments, all the residents that are to the north and it wouldn't take too much to clean up that rear facade and start covering up some of those gables, even if it's just another fake facade that you're presenting an image, even though it's the back of the building. Just to square it up, because right now you've got a very boxy contemporary modern structure and then all of a sudden, you've got three barns tacked onto the side of it, and it really doesn't tie in. That's where I'm going with it, and so I'm saying if you're going to propose something like that, clean up that back there so that at least it reads like the rest of the building just the way you did on the South facade.

Steve Powell stated no, I understand. I understand that, and again, I agree with that. The challenge that we would be faced with back here is that we don't have the opportunity for these large structural columns. I think that some of these columns go 12 feet, 15 feet deep. I mean because they have to be freestanding in order for the wind loads, the seismic loads, and everything else. We don't have that opportunity in the back. So, what from along those lines, what I would propose in that is to take this, for lack of better words like a corrugated metal or a pre-engineered metal facade back there is to create a parapet that resembles this. Again, it's more halfway in the FOD, so it's going to be disturbed by not only landscaping, but by all the product line that is within the FOD itself. But it would get rid of the gable elements, and honestly that is one of the things that bothers us a lot about this whole garden element because we don't design that. That is something that we have to follow their criteria and then we have to make the argument back to them saying well, you know there's no way it's going to be accepted, and it looks so different and that's why this energy was put up here. The logistics of this area is just like changing the floor plan of a store. If we add one column, we have been struggling with the the structural on this because of seismic

issues. We add a column that takes up away shelving space inside the store. They say sorry won't work and so we have to be very creative along those lines. So, in order to create more of this kind of stepped up, stepped down, there are different types of panels that can go into a pre-engineered metal building structure.

Chair Hamerly stated so, if you think of everything, let's just arbitrarily say that red line that's running across there is, I'll pick a number and say it's 12 feet off the ground. Just for the sake of discussion, so everything above that is basically non usable retail space if you want to call it that. So, if you did a horizontal element there that masked the gables, you could even think of it like a mechanical screen where it's basically just freestanding horizontal boards that are up there. They're acting as a screening element because where I'm going is it just falls apart when you have three triangles, just stuck arbitrarily to the end of a building.

Steve Powell stated I can't argue with it.

Chair Hamerly stated if you hide them somewhere and say call it a mechanical enclosure, if you will. Just mask it so that you're not looking at a nicely constructed clean box, then all of a sudden you have the Grand Tetons on the west side of your building.

Steve Powell stated well, we had the Grand Tetons on the other side too, so no, I agree with you and that's where again so this is, like we could create what would look like this in a stuccoed panel facade, but I've got to be able to make it to where it doesn't require the same kind of loading that this monster element does.

Chair Hamerly stated the instant it's solid, you've got your wind loads, plus your gravity loads, so I'm saying I'm throwing you a bone and say if you do a horizontal screen. The wind is going to pass right through, so you're taking away your flagpole loads, but now you've got something that at least visually masks it that continues the facade of the building.

Steve Powell stated I understand, and I appreciate that and it's one of the arguments that we've made to Tractor Supply multiple times, but they don't listen to us as much on that. The way they listen to us, honestly, is by coming back and say this is what you got to build, and they go OK mercy. It's a revolving door. Next year it's going to be something different, but I appreciate that. I appreciate the fact that you give us an option on that. I cannot argue. I don't like it either.

Chair Hamerly stated in terms of the screening that's going around the perimeter on how tall is the steel fencing that's going around the garden centers? Is it like 10-12 feet?

Steve Powell stated it's 8 feet. Again, that was, you know, Tractor Supply started in 1938 and thievery became very popular. They started out as catalog store but

when they they came in with this FOD component, 6 feet, man things were walking over the fence so 8 feet really became the absolute minimum.

Chair Hamerly stated is that screened in any way, shape or form other than the vegetation? Am I reading a mesh in between there? Both sides, all views.

Steve Powell stated it is wrought iron fencing. Again, if you go to a standard criteria, it starts out with galvanized chain link. Some areas allow a black vinyl chain link and then others are black vinyl chain link with privacy slats. Then then the version here, which I think we talked about this with Staff, is wrought iron with CMU columns.

Chair Hamerly stated because one of the conditions that we typically put on any type of outdoor storage is that it needs to be screened from adjacent properties and from the thoroughfare. So, where I'm going with this is if it's just a tube steel fence, or vinyl fence, whatever you're proposing that there should be a mesh screen so people can't see it. It's also a deterrent, it's not an attractive nuisance that they want to go over the fence, or you put a hedge in there and it looks like you've got some vegetation proposed on your northeast corner.

Steve Powell stated again, another challenge, and I'm glad you bring it up, but and I'll give you the honest answer, is on the front here, well, this is the future phase.

Chair Hamerly stated that's the one I'm targeting, particularly because if you don't have that other structure, it's going to look like you know just a naked wall back there.

Steve Powell stated well, I believe that we have privacy fencing all the way down to the Dollar and then we have screening in the rear. But what is very important to them is the product line, so it's not being hidden, you know, so you know they they want them to be able to see it and it's it comes right out of the mouth of babes when it comes to Tractor Supply. It's like well that's fencing material and you know it's an important component, and all of that always gets factored in. Like I said, we just finished a store in Jamul, California, and it's actually a beautiful store and it ended up being a galvanized chain link and they were completely happy with that, because it seems to be, I guess that silvery color with a chain link you can almost see right through it. We have tried everything we could. We built a store in Santa Clarita, actually, outside of Santa Clarita in Canyon Country and they had a condition to block it off completely. So, it went back and forth, and they ended up having us build an eight-foot-tall block wall on two sides that really becomes a graffiti magnet and then we ended up opening up the front. The conclusion at the end of the day was why didn't you just keep it open all the way around so and I'm not saying that the screening couldn't be there and Tractor Supply, you know again, they make it very important for us to realize that this is an important part of that outdoor lifestyle of the product line, that they're selling, and that's why they

have the permanent sidewalk display area for seasonal fruit trees and tractor implements, and that sort of thing that's just part of their product mix.

Chair Hamerly stated the portion of that yard that I was particularly keying in on, though, was the portion of that yard that is on the property line between Dollar Store and Tractor Supply.

Steve Powell stated I believe that that was the privacy fence.

Chair Hamerly stated okay, so that is solid, not see through.

Steve Powell stated Yes, well, it's the privacy slats.

Chair Hamerly stated because there's something else that is kind of seasonally unique to our end of the world here, we get ferocious winds from time to time. Chain Link does a wonderful job of trapping every bit of garbage is flowing down off the mountain. The vertical slats the steel fencing is just big enough that that stuff will pass through and blow into somewhere else and become their problem, but chain link traps everything and it really starts to look bad, so that's something to think about on how you choose to screen that. I've heard tube steel and I've heard chain link in this discussion, so you know, think about some of those factors.

Steve Powell stated I believe because we got a lot of stories going, what we ended up with, what we proposed originally was not this, but what we ended up with was the columns to to sort of resemble the architecture. Wrought iron along here. I think it's black vinyl chain link with privacy slats along that side for screening.
Chair Hamerly stated west side only.

Steve Powell stated yes, and then we have landscaping and iron in the rear

Chair Hamerly stated at the northeast.

Steve Powell stated and there's a block wall for the loading area, and then there's landscape in front of that because that was another point that came up.

Chair Hamerly state were there any trees proposed on the extension of the Foster Street as you come into the the property from that direction?

Speaker is inaudible.

Chair Hamerly stated you're going to have to either speak at the microphone or he's going to have to translate for you.

Jeff Maxwell stated it's showing up right now on the parcel that is the multi-family residential so it's not coming up on the Tractor Supply component, but in the

future when we submit plans next month, the landscape plan for the Apartment parcel will show kind of a street treatment along that..

Chair Hamerly stated the northern side of the Foster extension.

Jeff Maxwell stated yeah, the northern side of Foster. On the southern side of Foster, we have some screening there for the loading dock.

Chair Hamerly stated so I'm just reading hedge as opposed to the Cypress that are shielding the loading dock.

Steve Powell stated and that's in addition to a block wall also.

Chair Hamerly stated right.

Steve Powell stated and again we were under the impression that the the apartment will be more heavily scrutinized next month, but we do have a full landscape plan for that also.

Chair Hamerly stated the question was specifically and only regarding the Tractor Supply parcel. I was saying are there any trees on the south side of the Foster extension specifically to screen that loading area. I see hedges and I see a wall there, but I don't see anything that has any kind of mass that's hiding a very tall, blank side of the building back there and that's the side we're presenting to the apartments. Then everybody that's driving down the street coming through Foster that's going to Dollar store, that's going to the pharmacy, all of those.

Jeff Maxwell stated we have site, it's just the limitation that we have. We have Cypress trees here and here. Yeah, here in here.

Chair Hamerly stated so there are two stands of Cypress that are, one is on the diagonal portion of the the yard and the other is at the entrance to the the loading zone.

Jeff Maxwell stated correct.

Commissioner Miller stated it looks like from the illustrations that the landscaping is flush with the adjacent parking lot is, is that correct? Doesn't look like there's a curb or anything surrounding those. Is there any issue with vehicles coming in and driving into the landscape areas without that curb production?

Steve Powell stated where are we speaking?

Commissioner Miller stated from the illustrations here it is shown there is proposed curb. Okay. So, you know one of the things a cost saving measure you could implement is something some of that landscape you mentioned the

stormwater requirements earlier. If you're able to sump of that landscaping and hold on to that storm water at the surface, then you essentially reduce the size of that underground system, which is a little bit more expensive to do it underground as opposed to doing it on the surface, that could be a cost saving measure if that works with the type of landscaping that you have. Assuming that you can get stormwater from those impervious areas to then drain into that landscaping.

Steve Powell stated yeah, that's been part of the challenge and the other part of the challenge is being able to meet all the parking requirements and the circulation requirements without having to go underground. Because I agree, these storm tax systems are very expensive, very expensive.

Commissioner Miller stated so there's some opportunity there for some cost savings if you could potentially do some of that treatment within your landscaping. Just a general comment.

Chair Hamerly stated so on each individual parcel, and specifically to Tractor Supply, is there a calculation on the percentage of landscaped area that we're looking at because right now it looks like there's a very narrow parkway that may or may not be about ten feet on the Base Line frontage. Then we're looking at just slivers around the perimeter. So, is there a percentage of the lot area for parcel 1?

Leonardo, Project Landscape Architect, stated correct, so each is calculated out individually, but the percent total landscape area is 16.9%.

Chair Hamerly stated is that just Tractor Supply or is that the whole site?

Leonardo, Project Landscape Architect, stated it is.

Chair Hamerly stated because it looks like the biggest landscape area is on the north side of parcel 3.

Leonardo, Project Landscape Architect, stated it does look like the whole site. I don't know if Jeff can speak to that.

Steve Powell stated and again, we didn't do formal landscape plans on the four commercial outparcels. We did do one on the apartment because that is a project that moving forward

Jeff Maxwell stated I honestly, let's see.

Leonardo, Project Landscape Architect, stated it's 16.9% for the landscape area calculation.

Jeff Maxwell stated we calculated that as a part of the whole site.

Associate Planner Syed stated so in the mixed-use zone for landscaping like this, the minimum is 10% and which they met.

Chair Hamerly stated on each individual parcel, or on the entire conditional use permit area.

Associate Planner Syed stated for specifically this design. It's actually this whole site.

Chair Hamerly stated and that's my understanding. When I look at the pockets of proposed landscaping, Tractor Supply is, you know it's in the middle of everything and it's carved up by paving. So that's why I was asking that question specifically because it's design review just for parcel one and was wondering if each individual parcel was being graded to meet that 10% threshold, or if it's still the macro view and we're factoring in the apartments. We're factoring in parcel three, the big commercial tenant and averaging the entire thing over the entire site.

Associate Planner Syed stated I was looking at it as the entire conditional use permit, so the whole site.

Chair Hamerly stated okay, so it's conditional use permit. So, then the design review, which is each individual parcel, we could not then have the standard apply to each individual parcel. So, the challenge for the Commission and for Staff at this point is going to be mentally tracking that percentage because if the redesign does occur on parcels three through six, we're going to have to say we do need to set aside enough area, so we've met the landscape threshold, which could be a little bit limiting on the southeast corner depending on what tenant comes into that space. Because back to your point, if there were an opportunity to create bio swells or any on site capture of water. The most attractive option right now is on the north side of the big commercial tenant. That's the only place we have enough real estate in landscape to do that and that's unfortunately on the uphill side of the site. Anything else on site or landscape? Did everybody have a chance to see the color board that was here?

Commissioner Sutorus stated I just had one quick comment about your selection of palms. I don't know if our landscape architect is here tonight. Oh, he is, Scott this question is for you. Are the Washingtonian California fan palms as invasive as the Washingtonian Mexican fan palms?

Scott Rice stated they are, but here's the challenge. We have an established streetscape theme going through the Town Center where the anchor tree is the California fan palm, and that's something that's occurring on both sides of Base Line at a uniform interval. So, if we don't continue that pattern, it's going to be very apparent.

Commissioner Sutorus stated there was mention about migratory bird earlier. I mean they don't support any migratory birds mixing, I mean it's invasive. It grows up in the cracks of everything and it would blow into the neighbor's yards. Is there any other selection of palm that could be suitable to match the theme that's not invasive?

Scott Rice stated not really, it's a very dominant tree, the California fan palm. It's the real stout, real thick trunked one. It would just be that stretch of frontage where there's a different palm, so we've got a very, very dominant theme for about a mile there along Base Line.

Community Development Director Mainez stated if I can chime in, sorry about that. So, where these are located, they're in the Town Center, and they're usually part of the LMD, which is landscape maintenance district, and you may notice driving in and driving away from City Hall that the standard of maintenance is a little bit different than you would see on a private property, so we do require them trimming or regular maintenance of those things to address some of the issues you just pointed out. You're right, it is something that we inherit because we selected those trees to be the dominant colonnade along Base Line. So, now you could take them out I guess elsewhere in the site, but I think you're referring to the ones along Base Line, correct?

Commissioner Sutorus stated yes, specifically.

Community Development Director Mainez stated so the standard of maintenance is a little bit higher, in this case, so you won't get that problem and if we do, there's a phone call and a letter and a citation, and they usually get out there within 24 hours and start trimming.

Commissioner Sutorus stated it's not the trimming it's the seeds, the pods, and they spread everywhere.

Community Development Director Mainez stated I mean if you want to maybe put that on a topic that we can analyze, you know, under separate cover, come back to it and we can look at it. I know that's something our landscape architect has wanted to do for a while, is to go back and look at our palette. I'm not sure we're going to be able to do that. Why don't you give us direction to maybe look at considering some other trees that are similar? I don't know if that's something you can even do.

Scott Rice stated we can and so citywide we're definitely steering as many applicants as we can away from the fan palms. This is one of the last remaining pieces of an established theme, and so for this particular piece of town, for the Town Center corridor, this should be it. We wouldn't want to change at this point. Everything has been established there, but we could definitely as a whole, we could definitely look at other options other than the the fan palms. So, this is a tricky situation just because of the established theme, trying to find the balance.

Chair Hamerly stated fan palms are going and establishing the dominant structure as you go down the Base Line corridor. In different segments there are secondary trees that kind of add the shading element to the pedestrian walkway. I'm not observing that on on this particular application. Are there trees that are providing that secondary shade element for the sidewalk?

Scott Rice stated for this stretch we've got a narrow planter along the edge of the South side of the property along Base Line.

Chair Hamerly stated because one of the biggest deterrents to pedestrian activity is 100-degree temperatures and lots of paving. Any opportunity that we have to create some shade along that stretch if we're trying to create a Town Center and have pedestrian activity, that's an opportunity to do it. Even if we artificially did it with diamonds at the heads of the parking spaces, at least it would hang over the sidewalk and provide some intermittent shade through there.

Scott Rice stated is that something that we want to add as a condition of approval?

Chair Hamerly stated it's a suggestion because right now you know palm trees are not going to add any shade that's meaningful at the sidewalk level, and if we're trying to create a pedestrian thoroughfare or encouraged pedestrian activity through the Town Center. We better start thinking about shade and rest stops and shading bus areas and those types of things. There's a real detriment of that. You know, not that that's part of this, but especially on the south side of Base Line, there's very little shade there. I would encourage this as a directive to Staff to think along those lines about seizing opportunities to create shade along the sidewalk.

Community Development Director Mainez stated shade is going to be off the sidewalk if you plant them on the north side.

Chair Hamerly stated depends on the canopy, but yeah, at noon in the summertime when it's the worst. At least it's going to provide, you know whatever it is 20 to 25 feet on center you're going to get a canopy that's going to provide some relief. If we can keep the sun off the paving too, that also makes the sidewalk a little more pleasant.

Scott Rice stated we can definitely look at this further through the plan check process and see if there's opportunities for additional trees, I know that when the applicant was looking at the site and meeting their parking parking requirements, especially for Tractor Supply, just ran out of landscape room, just to get the queuing with the rows. But if there are opportunities for maybe additional diamond planters along that southern edge of parking.

Chair Hamerly stated it looks like about every six or seven parking spaces along the southern edge there you do have, looks like maybe a 6- to 8-foot-wide landscape strip between the parking spaces so if those trees either slid farther to the south or a second tree was positioned at the bottom, the southern edge of

those strips you know that might provide some additional shading. Going up Church Street they've got a really nice pattern through there and I think that one was well done. It's just a shame that you know Base Line is the major thoroughfare, and we've missed the trees on that one.

Scott Rice stated the application, as proposed, would be consistent with what's happening at CVS and Bakers, and so that the parking lot tree and the finger with the canopy it would provide intermittent shade. It's not ideal, but definitely there would be the opportunity to shove that tree a little bit closer to the sidewalk.

Chair Hamerly stated any thoughts on the landscape site plans? We kind of touched on the elevations. Any final thoughts on the color scheme and the elevations? And again, this would be a directive to staff to work with the applicant on, even though it may never get built, having a strategy for addressing the gable ends that are exposed on the north end of the building. It's a directive because they may never do that, and since it's just design review, it's not part of the CUP. That's why it would have to be a directive when and if this ever does happen. At least they've got a note to say, oh yeah, let's make an attempt at fixing that. Okay, that completes the design review portion of it. So, we've got the site plan, building elevations, conceptual landscape plan, the grading plan for the Tractor Supply parcel. Public hearing is still open with any final chance for comments.

Community Development Director Mainez stated we would like to just go back to the entitlement. There was a couple of discussions about the apartments. I just wanted to go back, and I should have brought this up earlier but under the CUP conditions on page 118. Condition number two, in that condition lists that one of the entitlements is one multi-family residential building. We've heard tonight that those are approximately 21 units. So, for ambiguity concerns, I don't want to make sure that when they come back, they don't bring in like a 10-unit apartment or a 50-unit apartment. We have to really narrow this down to a range, whether it's 15 or 20 or approximately 21 units. So that staff has good direction that this is what you're seeing tonight is going to fit there and we're not going to have to deal with any other size issues, so I don't know if you want to ask the applicant to clarify that.

Chair Hamerly stated well, it does look like there's three buildings proposed, so we would have to rewrite condition two since there are three of those multi-family attached structures.

Associate Planner Syed stated what Community Development Director Mainez is saying is to specify a specific number of units, or a range of units. It doesn't matter how many buildings.

Chair Hamerly stated right now the condition is it's a building. So, it should be a multi-family component would be a generic grab all term if they decide oh, we can fit 30 units on here by making them six feet wide, or we've only wanted to build four big units. At least we're having a multi-family component without tying anybody hands to saying, oh, you have more than one building. So, we don't

want to rewrite the conditions so that that's a good suggestion that you bring up. That does need to be wordsmith to address. Something generically that does capture the essence of what they're trying to achieve with parcel 2.

Community Development Director Mainez stated the other option is just to make sure that the attachment, this exhibit, is part of the conditions and so we can always refer to it.

Chair Hamerly stated even that's not safe, because that's not part of design review, and you're entitling it that's right of zone with a conditional use permit.

Community Development Director Mainez stated so many variables, I get that.

Chair Hamerly stated I would stick to the use because it's a multi use. So, if we target that use as a multi-family residential and scrub the term building then it gives them the freedom to design whatever units that they're going to end up proposing. It sounds like they're pretty well along, and they're going to be submitting that. I think we said January.

Assistant Community Development Director Stater stated and the removal of the single-family residential use because it's not actually required with the CUP.

Chair Hamerly stated so if we take out of the single-family residence portion of that, does that alter that 9.06 acres or did that include that one little parcel there on Villa?

Assistant Community Development Director Stater stated yes, that would have to be modified. So, staff can modify it following this meeting.

Chair Hamerly stated so the 9.06 is not accurate because it did include the single-family component.

Assistant Community Development Director Stater stated correct, as I assume that's what the map is, so we can modify that. We can adjust that to show the appropriate acreage.

Chair Hamerly stated so we have the one multifamily residential building that's going to be modified. Striking one single family residence on approximately blank acres northwest corner of Base Line and Church.

Associate Planner Syed stated do I have to read that into the record?

Chair Hamerly stated I was just trying to verbally go through the checklist of what we had just discussed. Just so staff has a directive when they're modifying that. So that would also change the proposal. Does that change the wording of what we're going to be reading?
Assistant Community Development Director Stater stated maybe as modified.

Chair Hamerly stated doesn't look like it. It looks like the items one, two and three in the recommendation are clean. So, then it does modify the statement of proposal on the cover of planning conditions and then item 2.

Assistant Community Development Director Stater stated we have a question on another directive when you're done.

Chair Hamerly stated it looks like it was the only occurrence.

Assistant Community Development Director Stater stated would you like a directive? I had some language written concurrent with the design review application on commercial phases 3 and 4. A revised conceptual landscape plan with embellished gateway entries from Base Line and Church shall be approved by the Planning Commission, which is a directive.

Chair Hamerly stated yes, I'm fine with the directive. I think the fact that none of the additional parcels that are not for consideration for design review landscape would be a component of that, because even their preliminary landscape that was submitted this evening just has green shaded areas, but it's not articulated, so they would have to bring those areas back.

Assistant Community Development Director Stater stated this would be a reminder that we're looking for those embellishments on the next set.

Chair Hamerly stated I will formally close the public hearing. Any final items for discussion. Seeing none, we'll entertain a motion at this time, and as a placeholder since item 2 is being modified and the proposal is being modified, it would be the conditions of approval as modified.

A Motion was made by Commissioner Amaya, seconded by Commissioner Sutorus, to:

1. Adopt Resolution 21-022, to approve Conditional Use Permit (CUP 21-006), Tentative Parcel Map (TPM 21-001), Design Review Application (DRA 21-004), subject to the Conditions of Approval, as modified, and Findings of Fact, certify the Mitigated Negative Declaration and recommend the City Council approve General Plan Amendment (GPA 21-002); and

2. Direct staff to file a CEQA Notice of Determination with the County Clerk of the Board of Supervisors. Motion carried, 4-1, with Commissioner Miller dissenting.

Chair Hamerly stated since the portion of this is a recommendation to the City Council, do you want him to elaborate on the negative?

Community Development Director Mainez stated just for the record, I know there were issues with the general plan amendment is that the only thing you had issues with?

Commissioner Miller stated that is it, that is all.

RESOLUTION NO. 2021 – 022
A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF HIGHLAND, CALIFORNIA, APPROVING TENTATIVE PARECEL MAP (TPM 21-001), CONDITIONAL USE PERMIT (CUP 21-006), AND DESIGN REVIEW APPLICATION (DRA 21-004) FOR MIXED-USE DEVELOPMENT CONSISTING OF FIVE (5) COMMERCIAL TENANT BUILDINGS, ONE (1) MULTI-FAMILY RESIDENTIAL BUILDING, AND ONE (1) SINGLE-FAMILY RESIDENCE ON APPROXIMATELY 9.06 ACRES AT THE NORTHWEST CORNER OF BASE LINE AND CHURCH AVENUE, CERTIFYING A MITIGATED NEGATIVE DECLARATION (ENV 21-003), AND RECOMMENDING THE CITY COUNCIL APPROVE GENERAL PLAN AMENDMENT (GPA 21-002) ALLOWING DRIVE-THRU FACILITIES WITHIN THE TOWN CENTER POLICY AREA

4. Public Hearing to declare the existence of a Public Nuisance in accordance with Title 8, Chapter 8.32, of the Highland Municipal Code, and authorize the abatement thereof, at the Property generally located at 7914 Calle Del Rio, Highland, CA 92346.

Chair Hamerly stated item number four is a public hearing to declare the existence of the public nuisance in accordance with Title 8, chapter 8.32, of the Highland Municipal Code, and authorize the abatement thereof at the property generally located at 7914 Calle Del Rio. At this time will proceed with staff report.

Community Development Director Mainez stated I want to point out some corrections Staff has made to the administrative record before you this evening. The corrections are reflected in the revised declaration of public nuisance which has been placed in front of you this evening. I'll hold it up, it's got the little green tabs on it as well. First, I want to direct your attention to a one-page handout. As I'm holding up here and this is intended to correct the order of attachments listed on page six of the staff report for the record. In the staff reporting notice of violation dated June 1, 2011, was mentioned but was not listed as an attachment on page Six of the staff report, and it was not included in the declaration of public nuisance resolution. That document should now be referenced correctly as attachment A in the record and in the resolution. Second, there were two city attorney letters inadvertently excluded from the staff report and resolution. Those two letters dated September 14 and October 26, respectively, by including the revised resolution and should now be referenced correctly as attachment J. In the record and in the revised resolution before you. Finally, the second page of the building official's special inspection report dated November 29, 2021, was inadvertently excluded from the staff report and resolution. The missing pages

included in the revised resolution. It should now be referenced correctly as attachment L. The code compliance officer is also requesting additional photographs be included into the public record this evening for the appeals board consideration. Copies of those photographs are also placed in front of you for consideration this evening. Copies of the corrected documents were also provided to the subject property owner and extra copies were made available to the public.

Code Compliance Officer Owens stated good evening members of the Planning Commission. My name is Barrie Owens and I'm a code compliance officer for the City of Highland. I'm currently assigned to the code Compliance case number 4744 located at 7914 Calle Del Rio in Highland, CA. Tonight I'm here to present the staff report for the public hearing to declare the existence of a public nuisance in accordance with Title 8, chapter 8.32 of the Highland Municipal Code and authorized the abatement thereof at the property generally located at 7914 Calle Del Rio, Highland, CA 92346. At this time, staff would like to give the Planning Commission members and the property owner a few minutes to review the additional documents added to the staff report and resolution.

Community Development Director Mainez stated I do want to point out that I don't see the property owner here this evening, for the record. I don't think she showed up tonight. As Code Compliance Officer Owens stated, if you need a minute or not, maybe you already looked at the attachments and so for example, the green tab labeled A, that's just a copy of the notice that was filed for that property. Then if you go to the green tab J. The two letters that I mentioned that were inserted, the one dated September 14, that one is just a request from our city attorney to the property owner to enter the property so we can do an inspection.

Chair Hamerly stated which already occurred, correct?

Community Development Director Mainez stated which already occurred, that's correct. Then the second letter, October 26, is briefly just saying the summary of the inspection that took place, as noted in the letter. So, if you want to read through, that's fine. We can spend a couple of minutes and just give us a nod when you're done, and we can proceed.

Code Compliance Officer Owens stated on May 28, 2011, Code Compliance opened a case after observing soil erosion from the block wall footings causing damages to the exterior block wall located on the southwest corner of the property. A notice of violation was issued to the property owner on June 1, 2011, requiring repair by June 15, 2011. From the period of June 15, 2011, to November 29, 2021, Code Compliance has issued five courtesy letters, two additional notices of violation, two warning citations and four administrative citations totaling $2,300. Additionally, the City Attorney has issued one request to inspect the property and two notices of correction to the property owner with the last compliance date of November 12, 2021. On March 14, 2019, the property owner was given the opportunity to meet with the City Building Official and Code Compliance Officer to discuss the violation and required repairs. The property owner did not accept the

invitation as she failed to respond. The additional photos you have received from the October 6, 2021, property inspection highlights the significant wall deterioration and damages to the landscape maintenance district. The block wall has continued to deteriorate and improper drainage from the property has enhanced the soil erosion, causing damages to the City's landscape maintenance district, while further compromising the integrity of the block wall. As evidenced, the City has provided the property owner with ample time to obtain a building permit and repair the damaged block wall. To date, the property owner has not obtained any building permits or repaired the damaged block wall and continues to maintain a public nuisance. In conclusion, we asked the Planning Commission to declare the property a public nuisance and adopt the attached resolution. This concludes the staff report and staff members are available to answer any question.

Chair Hamerly stated thank you, any questions for staff.

Commissioner Amaya stated the timeline, it started as you mentioned in May 2011 and then the next notice of violation was January 16, 2018.I mean, there's a seven-year time lapse there, isn't there?

Code Compliance Officer Owens stated there is, that is correct.

Commissioner Amaya stated why is that?

Code Compliance Officer Owens stated I unfortunately don't have all the information. I'm going to defer that to Community Development Director Mainez. I've been here for the City for about 3 1/2 years, so that was prior to my employment here.

Community Development Director Mainez stated so what we're doing tonight is presenting the facts of the events that occurred. Beyond that its most likely irrelevant. We're looking at they were cited, they were courtesy lettered, City Attorneys are now involved and here we are tonight. And you're right, a lot of time has gone by. We're ready to move on to the next step, which is going to be going to court and resolve the issue, so we're hoping that we can get the conclusion. To complete the administrative remedies and then move on to the next step.

Commissioner Amaya stated that's one good thing the wall hasn't collapsed in 10 years, but it's about to.

Commissioner Miller stated it's a private entities wall. It's that landowners wall, it's on their property, that's not public. It's right there, kind of at a threshold right, between what's public and private and our control.

Chair Hamerly stated it's a perimeter wall of a development, which is why it's blocked, but it's on private property.

Code Compliance Officer Owens stated that is correct and we do have the Building Official here who can actually answer any questions you may have in regard to the prior development. He did do some research on that.

Commissioner Amaya stated if you look at the drawings, actually the staff report. I know that the property owner hasn't done that, and they've had ample time. There's the middle part there, between the, there's a brick wall. Looks like specifically is it that middle portion where you have the deteriorations falling apart right there in the middle. So, the property owner just took care of that because my question is are they going to have to replace the whole all three parts in the backyard or just that specific middle part where you see the whole under? So maybe that's why they haven't done anything with the cost because I've seen the pictures where you can see that specifically and it's the one in the staff report right there where you see it, in the middle, that piece. Page 59, the top left picture, that portion of the wall, the owner would have to replace, or the whole wall have to be replaced?

Building Official Wirz stated the initial damage was to that portion of the wall that actually appears in that photo to be sunken down just slightly. That was the initial point of damage. From then it's migrated towards the eastern property, so if you're looking at the same picture, just the wall to the left, and I would say I don't remember the figures off top of my head, but let's say that was a 10 foot, roughly 8-foot, segment of wall initially that failed. Now we're looking at maybe an additional 14 foot or so to the left side of that photo. The cavities on the previous page 58 you can see is undermining that segment of slab just in front of that wall.

Chair Hamerly stated so those pictures on 58 are underneath the slab, that's at the edge of the patio and is not looking down into the wall.

Building Official Wirz stated they are indeed yeah, if you look at that wall and I guess there is not a good photo of that, but just at that wall segment, if you were to walk up to it, you could probably place your whole hand in between the wall and the slab. It's starting to leak.

Community Development Director Mainez stated I don't want to put in the record that there's not a good picture. We did provide additional photographs. Can you show our Building Official those and he could choose one that illustrates better what you are trying to convey?

Building Official Wirz stated I guess to clarify, that photo was not the best to show that angle. In fact, they're not labeled, the numbers, but the third page of photographs there you can see the column pilaster with the rock facade that is starting to split away. You can see clearly how far it's detached and the photo just below that, it's from further back point of view that shows it as well. Let me continue through these photos to see.

Chair Hamerly stated so two questions for you, one of the statements was that the degradation of the wall and the damage to the landscape maintenance district was the result of improper site drainage. Would that be drainage emanating from the subject property, or is it exacerbated by the erosion underneath the footing of the wall from the landscape maintenance side of the wall with the irrigation, because it looks like it's irrigation erosion on the street side, the South side of that wall.

Building Official Wirz stated understood and let me clarify just one more photo before I answer that question. If you go to the 8th page there you can see there's a picture of the hose in the backyard, dated 10/6/2021. The lower right-hand photo you'll see a bright orange color coloration. OK, so that's what I was talking about why the slab is actually detaching from the block wall there and that would be approximately the width of a hand. It's actually starting to lean outwards. In that same photo, you can actually see the cable that's attached to the wall and attached back towards a chain on the previous photo and then anchored into the ground there. It's kind of holding the wall back from over there.

Chair Hamerly stated so that cable is what's holding the wall up at present.

Building Official Wirz stated partly yeah and there's some retaining function that's taking place on the exterior side of that on the flow control of property. That's holding the wall as well in a portion. Back to the question that you had the site drainage issues emanate from the subject property in the best I can tell, the rear slab that's poured up against that wall. A portion of that does drain towards that corner or appears to when we took some levels to it. We were able to turn that faucet on that has the hose there and drain some water into the grass area. There's a little bit of a slump swell where the landscape and the hoses there with that stake. That's where the water was placed and we were attempting to try to find out where the water source might have been draining to, because as soon as you turn the faucet on, it will take just as much water as you can drain into it. We were unable to locate where that water goes to. We also did check the area drains in the rear, which flow out towards the front of the property.

Chair Hamerly stated that being the street that is to the east.

Building Official Wirz stated yes, the street to the east and that would be Calle Del Rio specifically. In the photos that show the cavity you can see some sort of drainage pipe or what's usually used as drainage pipe kind of encased in concrete. I don't know what purpose that serves. We do not see an outlet for that in any one place. I would lend to; my opinion would be that I don't feel that the landscape maintenance district would have in an irrigation issue that's lending towards this problem because of the initial damage was out towards the west side as that was repaired or replaced. It started to erode more south into the landscape maintenance district. So, the source is coming from somewhere again I've tried to go out back out to the site during a rain event to see if maybe there's some ponding that happens and finally breaks through and continues to erode but I've yet to find a good source.

Chair Hamerly stated because when I was just looking at some of the exhibits. You know one of the first things that jumped out at me, it looked like number one the footings are insufficiently deep for being on the edge of a two to one slope, so they didn't respect the slope set back. The wall looks to be unreinforced, which is why it's coming apart and so the remedy, given the way that the wall was constructed, even though there are certain parts that are obviously failing now, it seems like the remedy is to correct the substandard wall construction. There are going to be other areas that are going to have similar problems at some point in the future. If there are similar breakdowns in irrigation or drainage along that entire stretch. It looks like just the most vulnerable area was in that southwest corner of this property, but I would have no way of knowing that the conditions of construction improve anywhere along that southern portion of the property or along the western portion along the wash.

Building Official Wirz stated indeed. The western portion, I would say has more soil. Well, the foundation or footings of the wall is set back more to an adequate distance than this corner specifically, as it's failed out. As you go along the southern property there, through the landscape maintenance district, there are different conditions that vary, and I would probably agree that this is the most vulnerable spot.

Chair Hamerly stated and it does flatten out as you head to the east a little.

Building Official Wirz stated partly, and in fact I think the amended photos, the very last one, you can see an irrigation pipe or conduit that runs from the subject property through the wall, along the exterior of the wall on the south side and then back into the property. That portion there is relatively flat compared to the eroded out, washed out, portion where the wall has failed. So yes indeed, the conditions do vary, and I think, if I can find a good photo of this, where that corner pilaster is on the southern western most portion. I might be incorrect, but I thought as you progress through the east, there's another pilaster there, which would be the third or fourth page of the revised photos. You can see a pretty good visual of the second pilaster and kind of the flatter conditions that I'm talking about. If it helps, it looks like the fourth page and the photo you can see the landscape maintenance district with the tree there.

Chair Hamerly stated so getting back to the root cause of this, I noticed that there were area drains in the slab and was just wondering for whatever reason, if there's a break in that, that could cause erosion underneath the slab, an irrigation line breaks that could cause erosion. So, to me it's not just a remedy of fix the wall if it's not addressing the root cause. So, I'm wondering how far the declaration of nuisance goes in abating this condition, it is it requiring testing of all site drainage or irrigation drain lines along with correcting the wall. I didn't see it mentioned anywhere.

Community Development Director Mainez stated so tonight at the beginning I mentioned that we had advertently left out the second page of the Building Officials reports. So, if you can turn to the green tab labeled L and that's going to be the Building Officials report. On the second page, item number 3, it does tell the property owner that the source of the failure should be investigated further. So, we're not going to be able to solve that tonight. This is her wall, it's a private wall. There's damage and needs to be repaired. It's causing damage and there's potential life safety issues here with people maintaining the LMD. As well as on her property and we're just bringing that to light, so she's going to go through the process of coming to City Hall, hiring somebody to fix it, and then investigate the reason why it failed so it doesn't happen again. That's what that that's what item 3 is stating, correct?

Building Official Wirz stated correct and that's exactly where I was headed.

Chair Hamerly stated seems like the end result of all this and even some of the letters from the attorneys said if you don't fix it, we will, and it'll be a lien against the property for the expenses and the administrative costs. So that's kind of where I was going with that comment. Initially is just to ensure that the problem is remedied at the source, not just to have the City come in, and we're going to fix this wall, we're going to remove it, and we're going to put it back up and now it's corrected. If all the drainage issues or irrigation issues are not corrected, my concern is that if the City fixes the band aid, the wall, and doesn't adequately address the root causes through more investigation as item three here notes. At what point does the City become responsible if something else goes wrong and we've created a nightmare and stepped right into it.

Community Development Director Mainez stated correct, we we're not going to pursue taxpayers' funds on something that it's not going to be a permanent fix and not look at those reasons of why the wall failed. It's probably not the best option to have the City go in there and do that, but it is an option, so we'd have to go to court. We would have to go to court, present the design, the engineering, the reasons for the failure, and then ask for a warrant to go into the property. Based on all those engineering facts, which we don't have tonight, we're just saying the walls damaged, it's on her property, she needs to fix it. But that option is an option. It's an expensive one and there is that liability and I would probably suggest City not to do that. So, we'll just end up going to court. We'll give some estimates to the judge. Here's how much it's going to cost, here's the permit fees and this is the process. Give her as much time as you need, but if she doesn't do what you tell her, she's in contempt of court, and then the judge can deal with her. We have basically done all we could do as one of our Board Members has pointed out, it's been enough time. So, we're ready to move on. We have a lot of code cases that to deal with, this needs to be done.

Chair Hamerly stated does that warrant include, call it destructive investigation because it seems like some of these answers can only be determined if that slab

is saw cut out of there to see what's going on underneath it. So, does the warrant include that and does that need to proceed the court proceedings because that's part of the investigation.

Community Development Director Mainez stated our City Attorney is going to make sure we have all of the facts to support. All of what you're saying in the record tonight. So, if we have to bring an expert which is going to probably be a lot of our engineering staff, we might have to have a consultant. These are all charges I hope we don't have to do and I'm trying not to. I was hoping she (the property owner) would be here tonight to give a thumbs up. She's working on getting the funds to fix it. That's what I'm hoping the outcome will be, but I think this will show her that the City is at the end of its rope, and we need to move on. So, when we send her this resolution copy tomorrow and starting the clock, and by the way, we're giving her 45 days. You have the discretion to change that, and I know you did on the last one. You gave him a little bit more time. I would love to shorten it, but I think 45 days is probably reasonable.

Chair Hamerly stated especially given that we're heading into winter, and it's supposed to start raining on us anytime now.

Commissioner Miller stated I should disclose I have been in in the vicinity of this problem during rain events and have witnessed discharges through the wall and underneath the wall and have what I think is a pretty good understanding of what the issues are. I know given that I have that information I'm supposed to disclose that, so I'm disclosing it.

Chair Hamerly stated any final items for discussion? I do have to open the public hearing and no one else is in attendance, so we will close the public hearing and entertain a motion at this time.

A MOTION was made by Commissioner Amaya, seconded by Commissioner Thomas, to adopt Appeals Board Resolution No. 2021-023, declaring the existence of a public nuisance on the property located at 7914 Calle Del Rio, Highland, CA 92346 and order the abatement thereof. Motion carried, 5-0.

RESOLUTION NO. 2021- 023

A RESOLUTION OF THE PLANNING COMMISSION/APPEALS BOARD OF THE CITY OF HIGHLAND, CALIFORNIA, DECLARING THAT A PUBLIC NUISANCE EXISTS ON THE PROPERTY IDENTIFIED AS 7914 CALL DEL RIO STREET (APN 1210-451-01-0000), GENERALLY LOCATED AT THE SOUTHWEST CORNIER OF CALLE DEL RIO STREET AND GREENSPOT ROAD AND ORDERING THE OWNERS OF THE PROPERTIES TO ABATE THE NUISANCE CONTAINED THEREON

ANNOUNCEMENTS

Assistant Community Development Director Stater stated there will be items for your meeting in two weeks. We have two scheduled currently to bring to you. One will be a warehouse project at the northwest corner of 6th Street and Victoria Avenue and the other will be a design review for a Wendy's restaurant remodel/ exterior remodel like we did for the Taco Bell, a similar process and with your action tonight on the Tractor Supply that will go up to Council. So, we'll schedule that for January, and we'll keep you informed as that goes through the process.

The next Planning Commission meeting is scheduled December 21, 2021.

ADJOURN

There being no further business, Chair Hamerly declared the meeting adjourned at 9:04 pm.

STAFF REPORT

TO THE PLANNING COMMISSION

DATE: December 21, 2021

FROM: Lawrence A. Mainez, Community Development Director

PREPARED BY: Kim Stater, Assistant Community Development Director

SUBJECT: Conditional Use Permit CUP-21-007 to permit the development and operation of a 305,617 square foot warehouse and associated improvements, Variance VAR-21-001 to allow the warehouse building to exceed the maximum building height permitted in the Business Park Zone by 10', Design Review DRA-21-005 for the project's Site Plan, Building Elevations, Rough Grading Plan and Conceptual Landscape Plan, and Tentative Parcel Map 20384/TPM-21-002 to combine six (6) parcels into one (1).

LOCATION: A 12.29 acre site at the northwest corner of 6th Street and Victoria Avenue; Assessor's Parcel Numbers 1192-281-09 through 14 (Attachment 1 – Vicinity Map).

OWNER: Patriot USICV Victoria, LLC

REPRESENTATIVE Herdman Architecture & Design

RECOMMENDATION: Staff recommends the Planning Commission:

1. Adopt Resolution No. 2021 - _____ approving Conditional Use Permit CUP-21-007 for the development of a 305,617 square foot warehouse building and related improvements (Attachment 2);

2. Adopt Resolution No. 2021 - ____ approving Variance VAR-21-001 allowing an increase in the maximum building height for the subject warehouse from 35' to 45' tall, 10' greater than permitted in the Business Park Zone (Attachment 3);

Approved _____	Motion _____	Second _____	Agenda Item No. 2
Denied _____	Ayes _____		
	Noes _____		File No. _____
Continue _____	Abstain _____		
	Absent _____		

Kim Stater for
Recording Secretary

Lawrence Mainez
Community Development Director

3. Adopt Resolution No. 2021- ___ approving Design Review Application DRA-21-005 for the Site Plan, Building Elevations, Rough Grading Plan and Conceptual Landscape Plan, subject to the Conditions of Approval, and the Findings of Fact (Attachment 4); and

4. Adopt Resolution No. 2021-___ Approving Tentative Parcel Map 20384 TPM-21-002, creating a single lot for the project, subject to the Conditions of Approval, and the Findings of Fact (Attachment 5).

5. Adopt Resolution No. 2021-___ approving a Mitigated Negative Declaration and direct Staff to File and Notice of Determination with San Bernardino County Clerk of the Board of Supervisors (Attachment 6);

FISCAL IMPACT: The Applicant submitted the required deposit for processing the entitlements. Staff time spent working on the applications is charged to this balance. In addition, the developer will be required to pay Development Impact Fees (DIFs) to offset the costs of public facilities and infrastructure and construct on- and off-site improvements related to the development.

PUBLIC NOTICE: As required by City Council Resolution, a Notice of Public Hearing was posted at the City's three designated posting locations. The notice was posted on the City's website and mailed to property owners within 300 feet of the project site as well as those who requested notice.

PUBLIC COMMENT: Staff received one written letter of concern and one verbal inquiry related to the project. The written letter is addressed in the "Environmental Review" Section of the Staff Report below.

Staff responded to one (1) phone inquiry from a nearby property owner/resident at 26300 6th Street, located 180' west of Grape Street. The neighbor requested information regarding current and future land use and zoning. He did not express opposition or support for the project.

BACKGROUND: In June 2021, the City of Highland sold to the Applicant one of the six project parcels. The parcel in question is located at the southeast corner of the site, APN 1192-181-12. The property was determined to be surplus by the City because it was no longer needed to house Fire Station No. 3 which was ultimately constructed near 9th Street and Sterling Avenue. The City is not a partner or joint applicant in the project.

DESCRIPTION OF THE SITE: The site is comprised of six parcels, three (3) of which are currently vacant and the remaining three (3) contain residential uses to be demolished prior to the start of construction. Several of the residents keep horses on their properties

and have related improvements including corrals and arenas. These homes were constructed in the 1927, 1941 and 1950, but contain no features that qualify them as eligible for listing as a historical or cultural resource.

The site is relatively flat, sloping down gradually to the southwest. An earthen drainage channel runs along the easterly boundary that receives flows from the City storm drain within Victoria Avenue and runoff from the street.

The site is essentially rectangular and located in a City block bound by Cypress Street on the north, 6th Street on the south, Grape Street on the west and Victoria Avenue on the east (Attachment 6 – Vicinity Map). The block is zoned Business Park, but is currently comprised of legal, non-confirming single-family homes and vacant lots. The area is in transition from older residential uses, developed prior to the City's incorporation, to airport-related uses complementary to the Victoria Avenue Corridor that runs between the Highland Avenue and the San Bernardino International Airport.

> As stated in the Land Use Element of the General Plan, the Victoria Avenue Corridor is the *"primary passenger entryway into the San Bernardino International Airport from the I-210, new lands use patterns will need to be established to take advantage of future commercial opportunities, improve traffic and provide future development opportunities along Victoria Avenue."*
>
> *"Currently, single-family residential uses and scattered strip development maintain individual access points to Victoria Avenue, which create significant traffic congestion. Furthermore, to accommodate future traffic volumes, Victoria Avenue will need to be expanded and could impact current and future development along the corridor. To ensure quality development opportunities in the future, individual parcels will need to be consolidated."* (Attachment 7 - General Plan Except of Victoria Avenue Corridor)

North and west of the site there remains scattered single-family development and to the east are a variety of business park/industrial uses. To the south is the City of San Bernardino, an area currently vacant but known as former Norton Air Force Base housing (Attachment 8 - Zoning Overview).

Surrounding Land Uses

	Existing Use	*General Plan Designation*	*Zoning Designation-*
North	Multi and single-family homes and mixed uses	Business Park (BP)	Business Park (BP)
South	6th Street Vacant land, former Norton Air Force Base Housing w/i City of San	*City of San Bernardino* Multi-Family/High Density Residential (MFR)	*City of San Bernardino* Residential Medium (RM)/Multi-Family Residential R-3

	Bernardino		
East	Victoria Avenue Vacant parcels, industrial, religious and institutional uses	Business Park (BP)	Business Park (BP)
West	Grape Street residential, religious, and mixed uses	Low Density Residential (LDR)	Single Family Residential (R-1)

PROJECT REVIEW: The project proposes the construction of a 305,617 square foot, single-story, concrete tilt-up industrial building. The necessary entitlements include a Conditional Use Permit, a Variance for maximum building height, Design Review and a Tentative Parcel Map.

A. Conditional Use Permit

The Municipal Code requires the approval of a Conditional Use Permit to allow the establishment of "General wholesale, storage, and distribution including warehousing," in the Business Park Zone.

Site Plan – Access & Circulation The interior space would be comprised of a 295,617 square foot warehouse and two (2), 5,000 square foot mezzanine/offices. Additionally, there would be tractor-trailer loading docks, trailer parking, and passenger vehicle parking. The project would construct on-site and off-site improvements including utilities, storm drain facilities, landscape, irrigation, hardscape, trash enclosures, perimeter walls and gates. The building sits back 20' from 6th Street, 73' from Victoria Avenue and 73' from Grape Street (Attachment 9 – Project Plans).

There are four proposed driveways: two (2) on Victoria Avenue and two (2) on Grape Street. The southerly drive on Grape Street will provide vehicular access for passenger cars only and will have full access, right in/out and left in/out. The southerly drive on Victoria Avenue will provide vehicular access for passenger cars only and will have right in/out only access.

Commercial truck access will be from the two northerly driveways. The Victoria Avenue northerly driveway will have right in/out movements as well as left in. The northerly Grape Street driveway will have right in and left out movements. Road signage will restrict trucks from traveling north on Grape Street beyond the Project's northerly driveway. There will be onsite curbing and/or delineators that will force all truck egress movements south. Passenger cars may access at the northerly drives as well.

If the warehouse building were subdivided between two tenants, the main truck circulation pattern would be expected to be into the site from the northerly driveway on Victoria Avenue for the easterly portion of the building along Victoria Avenue, and exiting at the same point

of entry on Victoria Avenue. The westerly portion of the building will be accessed from westbound 6th Street, then northbound on Grape Street, and returning to Victoria Avenue in the opposite direction. From the intersection of 6th Street and Victoria Avenue, most truck traffic is expected to go south on Victoria Avenue and left (east) on either 5th or 3rd Streets and ultimately to the 210 Freeway onramps at Greenspot Road/5th Street. A lesser amount of truck traffic will travel north to the 210 via Victoria Avenue. The project is conditioned by the Engineering Division to construct or pay a "fair share payment" of road and drainage and traffic signal improvements on Grape Street, 6th Street, Victoria Avenue and the intersection of Victoria Avenue and 6th Street, respectively as referenced in the Conditions of Approval for the Conditional Use Permit in Attachment 2.

The building has 30 dock hi doors along the north side of the building, interior to the site. There are 50 trailer stalls along the northeasterly perimeter. The office/mezzanines are located at the northwest and northeast corners. The offices have identical floor plans consisting of restrooms, offices, a conference room, lobby, and breakroom on the first floor and a singular open office space on the second.

Trash enclosures are located on the east and west sides at the rear of the building. They are 33'Lx12'W. They are designed with painted tilt-up screen walls, steel gates and steel roof covering. Enclosures are conditioned to comply with the City and State's most current design criteria.

Parking: The Municipal Code requires industrial warehouses to provide one (1) parking stall for every 1,000 square feet of warehouse and one (1) space per every 250 square feet of office space. Therefore, the site would need 336 total spaces. See the calculation below.

Proposed Use:	**Size**	**Parking Ratio**	**Parking Required**
Warehouse	295,617	1/1,000 sf	296
Office Mezzanine	10,000	1/250 sf	40
Total Parking Required			**336**

Passenger car parking delineated on the Site Plan shows 129 parking spaces; 65 standard, 2 vanpool, 44 compact, 7 ADA, 6 clean air vehicles, and 7 electric vehicle spaces. Per Code requirements, this is an overall deficit of 207 spaces (336 required less the 129 proposed). Eleven (11) bicycle parking and storage spaces will be provided in accordance with the Highland Municipal Code.

The Applicant believes the City's parking standards to be in excess of typical warehousing needs and provided a parking study for consideration by the Commission to reduce the requirement as mandated by the Municipal Code. The parking study analyzed the specific site characteristics, parking ratios at similarly sized sites, and a comparison of surrounding communities.

The applicant studied two similar facilities within three (3) miles of the site: one in San Bernardino at the SEC Central Avenue & Tippecanoe, a 296K building with 197 spaces; the second on Redlands Blvd., a 326K building at the SEC Nevada Street & Almond Avenue with 174 spaces. Observations at each facility showed a peak demand of 112 at the San Bernardino facility and 55 spaces at the Redlands facility. Given these ratios, the estimated peak demand for the proposed Highland project is 115 spaces (Attachment 10 - Parking Study).

The study also analyzed requirements in a select number of Inland Empire cities with a significant number of warehousing and distribution businesses. The findings show that if this size project were building in Rancho Cucamonga the number of spaces required would be 135, for Fontana it would be 122, in Perris 124, and in Moreno Valley it would be 135 spaces.

Staff supports the parking demand study and its findings (pg. 10 of the study) that 129 spaces will be adequate to serve the site.

Noise: The neighborhood surrounding the project contains single family residents on the north, east and west. Special consideration is taken to ensure these sensitive noise receptors will not have significant impacts as a result of the project's construction and continued operation.

Noise and vibration are studied in Section 3.13 of the Initial Study beginning on Page 82. The report reviews Federal, State and Local standards. Appendix G contains data on Construction Noise Modeling, Equipment Specifications and Noise Calculations, and Traffic Noise Data and Calculations including traffic conditions in 2021 and 2040.

With respect to operational noises, the Study cites General Plan Goals and Policies that regulate noise and what actions are taken to limit it. For example, combined on-site noise includes HVAC systems, parking lot activity, and truck loading dock activity. As measured from the surrounding residences, the noise levels may reach 54 dBA L_{eq}. The acceptable noise level is between 55 and 60 respective of the time of day. The details are enumerated in Section 3.13.

With respect to construction noise, hours will be limited by the Building & Safety Division to 7:00 am to 7:00 pm. Construction noise will most greatly affect the residence to the north. During the most intensive construction, demolition, the 8-hour noise levels are 80 dBA L_{eq}, which meets, but does not exceed, the maximum level provided by the Federal Transit Administration's guidance document used as a local reference.

The project meets standards for both operational and construction noise.

Lighting/Photometrics: Parking lot lights include building and pole mounted LED "Razar" brand products which are constructed of a heavy cast copper aluminum with integrated cooling fins. The Photometric Study is included in the plan set, labeled FC-1. The site is well lit at its entries, along the building, parking lot and dock doors. There are two calculation zones on site. The zones average 1.3 and 2.0 foot candles with maximums of 4.6 and 15.2 foot candles at the back northwest corner, adjacent to the street. The Plan meets the Code requirement for an average of one-half foot-candle of illumination for visibility and security.

The plan does not clearly delineate the lighting levels at the property line. The Municipal Code, Table 16.40.160.B – *Site Lighting – Commercial/Industrial Mounting Heights* states that lighting shall not spill over or emit glare onto adjacent residential properties. Planning Conditions of Approval require a revised plan be submitted for approval by staff and clarify that the following standards are met:

- In no case should illumination exceed 0.5 foot-candles measured at the property line; and the amount of illumination project onto a residentially zoned property or use should not exceed 0.1 foot-candle at the property line; and
- Lights shall be shielded and directed away from surrounding residential uses. No glare should be visible from residential properties.

Also, Staff conditioned the parking lot light standards not to exceed 25 feet tall to aid in the reduction of spill over.

Compliance with Site Development Standards

The Municipal Code has many standards related to setbacks and on-site development improvements. The project meets each of the standards:

- Minimum front, street side and rear building setback areas of 20' each
- Maximum lot coverage of 60%
- A minimum building separation of 40 feet shall be required from adjacent residential districts (Grape Street residences). At least 20 feet of said setback, which is nearest the street or district boundary line, shall be landscaped. The remainder may be used for internal circulation/access or off-street parking.
- A three-foot high wall or berm shall be constructed in back of the landscaped area along street setbacks (Planning/Landscaping Condition of Approval No. 19-22).
- Where off-street parking is located within building setback areas, a minimum landscaped area of 10 feet in depth shall be provided between the property line and parking area, with an additional minimum landscaped area of 10 feet in depth required between the parking area and the building.

B. Variance

The maximum building height permitted in the BP zone is 35'. The Applicant proposes an overall building height of 45', exceeding the maximum by 10' (29%). A minor variance is required if the project is to be approved as detailed in the Building Elevations.

The Applicant provided findings that describe why the project necessitates the additional height. These include: internal clear heights of 36' to accommodate, "joists, lights and sprinkler systems... and 4-5 feet to reach the roof of the structure, followed by an additional 4-5 feet above the roof line to screen roof-mounted equipment, such as HVAC systems." The building is proposed at the minimum height demanded by the market and if reduced by 10' would lose approximately 30% of its storage capacity, drastically reducing its usability as noted in the findings (Attachment 11 - Variance Findings Memorandum).

C. Design Review:

Building Elevations: The building type is a tilt up concrete warehouse, 425' x 761', and 45 feet tall. The exterior has a unique modern style, setting the tone for entry into the Airport Gateway. It is relatively flush with eye-catching corner statements. The walls are white (Sherwin Williams "Incredible White) with black, white and blue geometric columnar accents on most panels. The panels are in 26' sections that each have four to five (4-5) geometric columns. There are two foot (2') tall black bands on variable panels to provide differentiation along the roofline of each side of the building.

The building's four corners are clad with an aluminum framed storefront system consisting of blue reflective glazing and black mullions and a black metal band which is vertical on some corners and horizontal on others. Additionally, the corners have a decorative solid white metal canopy with blue LED underlighting and multiple decorative metal brows above, some white and some black also with underlighting. The roof parapet will screen roof-mounted equipment.

The building design was made with consideration to the General Plan's Land Use and Community Design Elements and the administrative draft (unpublished) Airport Gateway Specific Plan. The site was designed to highlight the importance of the entry to the airport with its sleek contemporary design, formalized landscaping and public art.

The draft Airport Gateway Specific Plan, a multi-jurisdictional plan, involving the Cities of Highland and San Bernardino, the San Bernardino International Airport Authority / Inland Valley Development Agency, San Manuel Band of Mission Indians, and East Valley Water District. This plan, once adopted in the future, will establish the land uses (design standards and streetscape plan) south of the project site. The Plan is awaiting final edits and presentation to the various agencies for adoption. Although it is not yet approved, staff did ensure that the subject project was not in conflict with overall land use and site design guidelines.

Grading Plan: The site is relatively flat, sloping down slightly to the southwest. Once graded, the elevation will fall approximately eight feet (8') from the northeast to southwest. Roof drains and catch basins are located throughout the property bringing surface water to a 96" CMP infiltration system located underground below the westerly parking lot. This facility is capable of receiving a 100-year storm event. Should the facility fill, water will enter the City's off-site storm drain system.

The warehouse itself slopes down westerly at 0.5% with a three foot (3') fall east to west.

The project will install curb, gutter and sidewalk around its perimeter. Overhead utilities will be underground and poles removed. The project will tie into existing water, sewer, and gas lines in the adjacent street. There is an existing drainage ditch on the easterly boundary that conveys water to the south. It will be removed and replaced with a 42" storm drain.

Right-of-way dedication will be required on Victoria Avenue along the Project frontage to provide a 52' half street width. The frontage will be improved with roadway widening, drainage improvements, curb and gutter, a 6' sidewalk and landscaping. 6th Street frontage will have a 33' half street width for right-of-way with similar roadway widening curb, gutter, sidewalk and landscaping. Grape Street frontage will have a 60' half street width and 6' Public Utility and Sidewalk Easement accommodating truck traffic north and south along the project frontage. Roadway widening, curb, gutter, sidewalk and landscaping will be constructed along the Project frontage of Grape Street.

Landscape Plan: The project's Conceptual Landscape Plan has a varied palette of evergreen and deciduous trees and groundcover well suited to the local climate. The Desert Willow and Chitalp are deciduous trees that will provide attractive orchid-like and lacy pink flowers. Evergreen varieties consist of the columnar Italian Cypress, Olive, African Sumac, and Brisbane Box. Shrubs include the Dwarf Bottlebrush and Autumn Sage with colorful red flowers, Fortnight Lily, lavender flowering Mexican Sage with accent succulent of Blue Glow Agave growing 2-3' wide, and Soap Aloe. Groundcover throughout the site will be Trailing Acacia, Lantana, Pink Muhly, and Prostrate Rosemary, all of which are categorized as "low water" users. There is a good mix of 1, 5 and 15 gallon species as well as 24", 36" and 48" box trees.

The African Sumac and Desert Willow are the dominant tree species with additional Olives along the right-of-way and Chitalp and Brisbane Box along the interior adjacent to the building. The full project frontage along Victoria Avenue, 6th Street and Grape Street is landscaped with a minimum 20' planter as well as 5' of landscaping within the public right-of-way. There are additional planters between the parking and building on the east and west sides and planters separating every eight passenger vehicle parking spaces.

The Landscape Plan was reviewed by the City's Landscape Architect and found to be adequate for an industrial land use as it relates to tree shade and spacing. However, additional attention should be given to complement the unique design character of the

building especially near vehicular entries and the facility's office. Conditions of Approval can be found in the Planning Conditions to address these. Most notably, Conditions require:

- Add Landscaping planters along the full frontage of the northerly project boundary
- Landscape planters along Victoria Avenue, 6th Street and Grape Street frontages shall incorporate three-foot (3') mounds to buffer the visual impact of the parking lot from the public right-of-way.

Public Art: In the spirit of complementing the Victoria Avenue Corridor design guidelines and draft Airport Gateway Specific Plan, the Applicant is proposing an eight foot (8') tall public art piece at the southeast corner of the site, adjacent to the intersection of 6th Street and Victoria Avenue. It is a blade-like sign announcing, "6th & Victoria Highland." The lettering is six and eight inch (6-8") tall, matt black, individual metal letters. Each word/number is on a separate metallic "brow"/ledge. The background is white with a gray vertical band. On the left side of the sign, adjacent to the "Highland" lettering is a small, tri-color City logo.

The art piece is located within a landscaped planter, 9' back from the sidewalk. Surrounding plant materials include a mix of groundcover, accent plantings and is flanked by olive trees.

Walls and Fences A screen wall will be installed along the northern perimeter, adjacent to the existing residential development and will extend south to secure the gated entrances to the truck parking and dock doors. It will be concrete tilt-up screen wall 8' tall wall with 9' pilasters at 25' on center. The wall would be painted mostly black with a 2' band at the top painted white and 4' wide pilasters also white in color. Painted steel gates will be provided for pedestrians and truck traffic. Landscape plantings will be installed adjacent to each wall to soften the exposure. These walls and gates meet the Municipal Code standards including location, height and materials.

There is an 80' long section of the wall located interior to the Victoria Avenue entry that is slightly taller; 11' tall wall and 12' pilasters. Because the wall is interior to the site, and outside all building setbacks, it is not limited in its maximum height. It connects to the rear of the warehouse and is not visually obtrusive.

D. Tentative Parcel Map

Prior to development of this project site it is necessary to consolidate the 6 separate parcels and create a single parcel incorporating the site's improvements as a warehouse/distribution center. Tentative Parcel Map 20384 is included in Attachment 9 – Project Plan Set. The configuration of the new lot is essentially rectangular and results in street frontages along Victoria Avenue, 6th Street and Grape Street. It is approximately 900 feet wide by 500' deep. The proposal meets standards established by the Subdivision Map Act as well as the Section 16.68 Subdivisions, of the Highland Municipal Code. It is more than one (1) acre in area and its widths and depths exceed 150'.

ENVIRONMENTAL REVIEW: An Initial Study was prepared for the project. It was determined that Mitigation Measures were necessary to address reduce impacts to below a level of significance in the areas of air quality, biological resources, cultural resources, geology and soils (paleontological resources), hazards and hazardous materials, and tribal cultural resources.

A Notice of Intent to Adopt a Mitigated Negative Declaration (MND) was circulated through the California State Clearinghouse and made available for comment between November 5 and December 9, 2021. The Notice was mailed to surrounding property owners within 300 feet, interested agencies and parties requesting notice. It was also posted on the City's website, at City Hall, the Sam J. Racadio Library and Environmental Learning Center and Fire Station #1.

The City received one letter in response to the Notice. It was received on December 9th from Golden State Environmental Justice Alliance. The letter outlined a number of concerns related to CEQA topics including Air Quality, Energy, Greenhouse Gas Emissions, Biological Resources, Hazards and Hazardous Materials, Land Use and Planning, Population and Housing, and Transportation. The Project's environmental consultant and City Staff prepared a response to each comment and these are provided in the Final IS/MND for review by the Planning Commission (Attachment 6). The draft IS/MND Findings and Mitigation remain unchanged.

Based upon the Findings of the Initial Study and adoption of Mitigation Measures, the Project will not have a significant impact upon the environment. Staff recommends adoption of a Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program.

CONCLUSION: The project represents the first large industrial development within the Victoria Avenue Corridor. As stated above, the Corridor is a policy area given special consideration in the General Plan as it undergoes transition from aging single-family housing stock and to a variety of mixed uses which are poised to take advantage of new land use patterns, commercial opportunities, and improved traffic facilities. Development within the San Manuel Reservation at the northerly terminus of Victoria Avenue and on the San Bernardino International Airport at the southerly terminus of Victoria Avenue have made notable progress in recent years.

The project is located at the southern portion of the corridor, a gateway to the Airport. General Plan Goal 10.2 seeks to create attractive and visually unified major arterial corridor with specialized streetscape and landscape improvements. Goal 10.8 seeks to ensure that development is professional and attractive in appearance through coordinate site planning, signage and architectural design. The project will be responsible to construct right-of-way improvements around its perimeter including Victoria Avenue and contribute to the future 12' landscaped median. As conditioned by the City's Landscape Architect, the project must exhibit specialized landscaping to acknowledge and highlight this important gateway. The corner signage/public art identifies the entrance to Highland and this significant intersection within the 3rd and 5th Street Corridor Police Area and the Victoria Avenue Policy Area. It

enhances the contemporary architecture of the building and sets the tone for surrounding development in Highland.

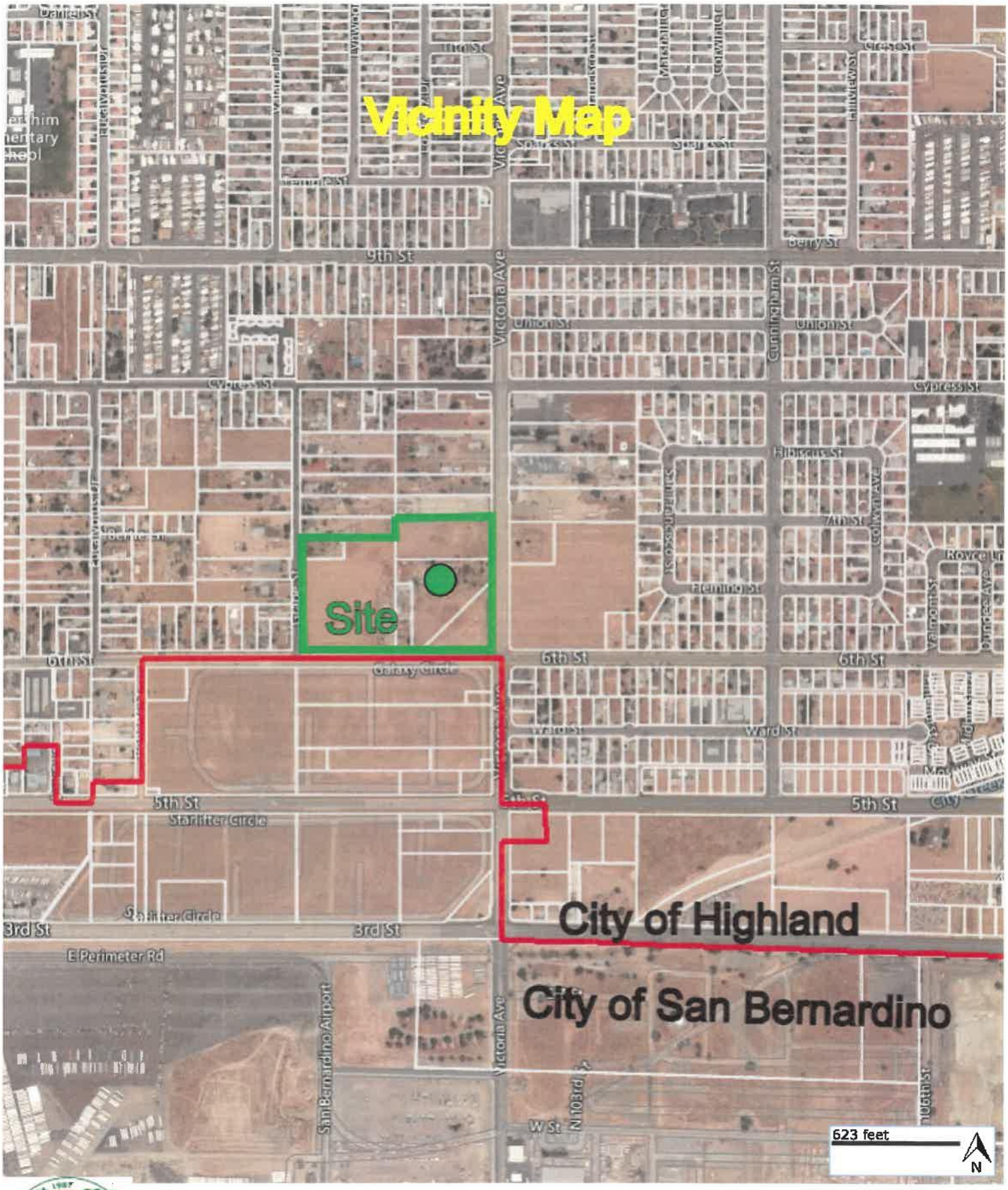
The design meets the intent of Policy 10.8.2 which encourages "contemporary, clean and distinctive buildings with clearly visible entrances" and Policy 10.8.3 to "avoid long, blank building walls by incorporating vertical and/or horizontal façade articulation and modulation and varying use of color, materials and landscaping." It consolidates smaller lots into larger parcels to create a larger, more functional use. Parking and service areas are screened from public view with walls and landscaping and berms and utilities will be underground. The building is set back as far as possible from adjacent residential uses. The project meets development standards prescribed by the Municipal Code with consideration given to reduced parking and increased building heights. Staff recommends approval subject to the Conditions of Approval and Findings of Fact.

Attachments:

1. Vicinity Map
2. Resolution No. 2021-___ Approving Conditional Use Permit CUP-21 007 **(Conditions attached)**
3. Resolution No. 2021 - ___ Approving Variance VAR-021-01
4. Resolution No. 2021 - Approving Design Review Application DRA-21-005 **(Conditions attached)**
5. Resolution 2021 - ___ Approving Tentative Parcel Map 20384, TPM-21-002 **(Conditions attached)**
6. Resolution No. 2021-___ Approving a Mitigated Negative Declaration **(MMRP, Draft & Final IS/MNDs attached)**
7. General Plan Excerpt – Victoria Avenue Corridor Policy Area
8. Zoning Overview
9. Project Plan Set
   (Site Plan, Building Elevations, Grading, Landscaping, Parcel Map)
10. Parking Study
11. Variance Findings Memorandum

ATTACHMENT 1

Vicinity Map



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Attachment 2

Resolution No. 2021 - ___

Approving Conditional Use Permit CUP-21-007

PC RESOLUTION NO. 2021 – ____

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF HIGHLAND, CALIFORNIA, ADOPTING A CONDITIONAL USE PERMIT FOR THE DEVELOPMENT OF A 305,617 SQUARE FOOT WAREHOUSE AND ASSOCAITED IMPROVEMENTS AT THE NORTHWEST CORNER OF 6TH STREET AND VICTORIA AVENUE. RELATED ENTITLEMENTS INCLUDE DESIGN REVIEW APPLICATION DRA-21-005, VARIANCE VAR-21-001 AND TENTATIVE PARCEL MAP 20384/TPM-21-002. ASSESSOR'S PARCEL NUMBERS 1192-281-09 THROUGH 14.

APPLICANT: PATRIOT USICV VICTORIA, LLC (PATRIOT PARTNERS)

A. RECITALS

1. On June 16, 2021, the Applicant filed an application for Conditional Use Permit CUP-21-007 to develop a 305,617 square foot industrial warehouse and associated improvements including loading docks, tractor-trailer stalls, passenger vehicle parking spaces, a stormwater detention/infiltration basin, and landscape area requiring approval of a Conditional Use Permit. Related applications were also filed for Design Review DRA-21-005 including a Site Plan, Building Elevations, Rough Grading Plan, conceptual Landscape Plan; Variance VAR-21-001 to increase the maximum building height permitted to 45'; and Tentative Parcel Map 20384/TPM-21-002 to merge six (6) parcels into one (1);

2. The site is located on an approximately 12.29 acres at the northwest corner of 6th Street and Victoria Avenue within the City's Business Park Zoning and General Plan Designations;

3. Pursuant to the provision of the California Environmental Quality Act (CEQA) and State and Local CEQA Guidelines, the City of Highland is the Lead Agency, and is charged with the responsibility of deciding whether or not to approve the proposed Project. An Initial Study and Mitigated Negative Declaration were prepared and circulated in accordance with state and local law and will be considered by the Planning Commission at the December 21, 2021, public hearing;

4. On December 21, 2021, the Planning Commission of the City of Highland conducted a Public Hearing at the City Hall Council Chambers in Highland, California, at 6:00 p.m.

5. All legal prerequisites to the adoption of this Resolution have occurred.

B. RESOLUTION

NOW THEREFORE, it is hereby found, determined and resolved by the Planning Commission of the City of Highland as follows:

Section 1. The Planning Commission finds that all of the facts set forth in the Recitals, Part "A" of this Resolution, are true and correct.

Section 2. Pursuant the California Code of Regulations, the City of Highland Planning Commission hereby finds that a Mitigated Negative Declaration prepared for the project has been completed in compliance with the California Environmental Quality Act (CEQA) and that the Planning Commission has reviewed and considered the information contained in the staff report, and the comments received during the public review process, prior to approving the project.

Section 3. Based upon substantial evidence presented to the Planning Commission during the December 21, 2021 Public Hearing, including public testimony and written and oral Staff Reports, the Planning Commission finds as follows:

a. All necessary public meetings and opportunities for public testimony and comment have been conducted in compliance with State Law and the Municipal Code of the City of Highland.

Section 4. Conditional Use Permit Findings of Fact (CUP-18-002):

a. The proposed use is permitted within the subject district pursuant to the provisions of this section, and complies with all of the applicable provisions of this title; and is consistent with the goals, policies, and objectives of the Highland General Plan, and the applicable development policies and standards of the city.

Response: A warehouse facility, such as the one proposed, is permitted within the Business Park Zone upon approval of a Conditional Use Permit. Applicable provisions in Title 16, *Land Use*, include but are not limited to, Chapter 16.24 *Employment Zones*, 16.40 *General Development Standards*, 16.54 *Parking*, and 16.68 *Land Divisions* with respect to the Tentative Parcel Map. The project meets the standards established in the chapters with the exception of a request for a variance to increase the maximum building height to 45'. Additionally, the Applicant is requesting the Commission consider a reduction in the number of parking spaces from 336 to 129. Findings can be made for each of the deviations.

The General Plan goals and policies relevant to the project include its inclusion in the Victoria Avenue Corridor Policy Area, and general standards applicable to the Land Use Element, Circulation Element, and Community Design Element. The project meets all relevant goals and policies.

b. The proposed use would not impair the integrity and character of the district in which it is to be established or located.

Response: The project would be developed in compliance with the Highland General Plan and Municipal Code standards related to warehousing in the Business Park District within the Victoria Avenue Corridor Policy Area. It meets development code standards such as land use, setbacks, density, lighting, parking, circulation, etc. It has a high quality, modern design complementary to the Policy Area as it is a gateway into the San Bernardino International Airport. It represents the first of many business park and industrial uses expected to replace the

existing legal-non confirming, aging housing stock. It has quality finishes, landscaping, hardscape and will construct surrounding infrastructure including, curb, gutter, sidewalk and water quality features.

c. The site is suitable for the type and intensity of use or development which is proposed.

Response: The project site is more than adequate for industrial development as it combines six (6) parcels for a total of 12.29 acres. The minimum lot size in the District is 1 acre. It is relatively flat and will require the demolition of aged housing stock on three (3) of the lots. There are no geographic or man-made impediments to the development of a warehouse on this site. There are utilities available within the adjacent right-of-way and drainage is good for on-site water retention and water quality treatment. There is access to the site from three of its four sides and it is in proximity to other sites zoned for Business Park uses. It is also located within a half mile of the San Bernardino Airport and one and a half mile of the 210 Freeway.

Per Municipal Code Section 16.24.040 Employment District Development Standards, the maximum lot coverage is 60%. The project calls for 57.1%. It meets the minimum lot size, lot width and dept as well as required building setbacks and landscape coverage.

d. There are adequate provisions for water, sanitation, and public utilities and services to ensure public health and safety.

Response: Existing water, public utilities and services for the project are available adjacent to the site within the public right-of-way. East Valley Water District provided a "Will Serve" letter to the applicant, confirming the provision of water and sanitary sewer services. All other utility providers were given notice of the project and none expressed concern. Public health and safety was addressed with the design and conditioning of the project.

e. The proposed use will not be detrimental to the public health, safety, or welfare, or materially injurious to properties and improvements in the vicinity.

Response: The proposed condominium development will be in compliance with Municipal, Fire & Building codes. Each public safety division of the City has reviewed the project and provided relevant Conditions of Approval that will be adopted by resolution. The necessary ingress and egress are provided and all public utilities and services will be in place. There is no indication that the project would be detrimental to the public health, safety or welfare, or materially injurious to properties and improvement in the vicinity.

f. The proposed use would not result in a significant effect on the environment.

Response: Pursuant to the California Environmental Quality Act (CEQA) and State and Local CEQA Guidelines, the City of Highland is the

Lead Agency. As such, the City oversaw preparation of an Initial Study which was made available for public review from November 5, 2021 to December 9, 2021. The Initial Study finds that either no impact or less than significant impacts would be associated with the issues of Aesthetics, Agricultural and Forestry Resources, Energy, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population/Housing, Public Services, and Recreation, Transportation and Traffic, Wildfire, and Utilities and Services Systems.

The Initial Study also finds that the issues of Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Tribal Cultural Resources require the implementation of mitigation measures to reduce impacts to a less than significant level, and a Mitigated Negative Declaration is the appropriate document for this project and will be adopted concurrently with the Conditional Use Permit.

Section 5. That all necessary public meetings and opportunities for public testimony and comment have been conducted in compliance with State Law and the Municipal Code of the City of Highland. As described in the Recitals above, the Planning Commission considered the project, and all testimony, comment and evidence regarding the same, at noticed public hearings conducted in accordance with State Law and the City Municipal Code;

Section 9. Based on the Findings and Conclusions set forth above, the Planning Commission approves Conditional Use Permit (CUP-21-007) facilitating the construction of a 305,617 square foot warehouse and related improvements. All improvements will be completed subject to the Conditions of Approval attached hereto and the development plans incorporated by reference.

Section 10. The Planning Commission hereby directs Staff to file a Notice of Determination with the San Bernardino County Clerk of the Board of Supervisors, pursuant to the Public Resources Code and State CEQA Guidelines.

C. ADOPTION OF RESOLUTION.

The City Clerk shall certify to the adoption of this Resolution and shall cause the same to be published or posted in the manner prescribed by law.

PASSED, APPROVED AND ADOPTED this 6th day of November, 2018.

ATTEST:

Randall Hamerly, Chairman Planning Commission	Lawrence A. Mainez Community Development Director

CITY OF HIGHLAND

PLANNING DIVISION CONDITIONS OF APPROVAL

Date:	December 21, 2021
Applicant:	Patriot USICV Victoria, LLC (Patriot Partners)
File/Index:	**Conditional Use Permit CUP-21-007**
Proposal:	The development and operation of a 305,617 square foot warehouse/logistics and associated improvements.
Location:	A 12.29 acre site at the NWC of Victoria Avenue and 6th Street. APNs: 1192-281-09 through 14
Related Entitlements:	DRA-21-005, VAR-21-001, TPM-21-002

PLANNING CONDITIONS OF APPROVAL

Note: These conditions represent Planning Division conditions only and are meant to be only one part of the Project's overall conditions that may include Building and Safety, Engineering, and the Fire Department conditions of approval. All required on-site and off-site improvements shall be completed and approved prior to final inspection for occupancy, except where noted.

Conditional Use Permit CUP-21-007 is conditionally approved, subject to compliance with the requirements as specified below. The Conditions listed below are continuing Conditions; failure of the Applicant and/or operator to comply with any or all Conditions at any time, shall result in initiating revocation of the subject permit.

1. Conditional Use Permit CUP-21-007 shall become null and void:

    a. Unless all conditions have been complied with and the occupancy or use of the land or structures authorized by this design review application, and have occurred within thirty-six (36) months from the approval date this design review application shall expire and be null and void without further action by the City of Highland.

    b. Where circumstances beyond the control of the Applicant cause delays which do not permit compliance within the time limitation established in this Section, the Planning Commission may grant an extension of time for a period of time not to exceed an additional thirty-six (36) months. An application for an extension of time must be set forth in writing, stating the reasons for the extension, and must be filed with the community development department no less than 30 calendar days nor more than 90 calendar days prior to the expiration date of the permit or approval. Such application shall be filed together with the City's processing fee, as established by the City Council.

NOTE: All required on-site and off-site improvements shall be completed and approved prior to final inspection for occupancy.

2. The proposed Entitlement permits the construction and operation of an approximately 305,317 square foot warehouse and associated improvements including loading docks, tractor-trailer stalls, passenger vehicle parking, a stormwater detention/infiltration basin, landscaping and off-site improvements along the project frontages of Victoria Avenue, 6th Street and Grape Street as illustrated in the approved plans.

    a. Three complete sets of revised plans reflecting changes required by these conditions of approval and Planning Commission directives shall be submitted to the planning Department within two weeks of this project's approval.

3. The project site has been reviewed and approved for warehouse/logistics use with no outdoor storage of materials. Any change of use of this project site, the occupancy, or tenant change in the building, or portion thereof, may require a revised plot plan be submitted to the City for review and approval, which identifies location of use, letter of intent and parking requirements.

4. No outdoor storage facilities may be constructed or placed onsite for either permanent or temporary use. This includes, but is not limited to storage sheds, cargo containers, tents, canopies, or similar structures.

5. There shall be no long-term parking of semi-trailer trucks unrelated to the warehouse business in operation.

6. The operator and recorded owner of the property shall submit to the Planning Division written evidence of agreement with all conditions of this approval before the approval becomes effective. Plan check cannot begin prior to receipt of this signed documentation.

7. In compliance with the Highland Municipal Code, the Applicant/Owner shall agree, at his/her sole cost and expense, to defend, indemnify, and hold harmless, the City, its officers, employees, agents, and consultants, from any claim, action, or proceeding brought by a third-party against the City, its officers, agents, and employees, which seeks to attack, set aside, challenge, void, or annul an approval of the City Council, Planning Commission, or other decision-making body, including staff, concerning this project. The City may, at its sole discretion, participate at its own expense in the defense of any such action but such participation shall not relieve the Applicant/Owner of his/her obligations under this condition.

8. The Owner/Applicant is responsible for implementing all conditions of approval to the satisfaction of the Community Development Director, City Engineer, Fire Department, and Police Department. No final inspection or clearances shall be given until all conditions are met. Each condition of approval is separately enforced, and if one of the conditions of approval is found to be invalid by a court of law, all the other conditions shall remain valid and enforceable.

9. Revisions, modification, or deletions of associated plans must be submitted to the Planning Division for review and approval. Revisions may require additional review by the Planning Commission.

10. Pursuant to provisions of California Public Resources Code Section 21089 (b), this Application shall not be operative, vested or final, nor will building permits be issued or a map recorded, until: (1) the Notice of Determination (NOD) regarding the associated environmental action is filed and posted with the Clerk of the Board of Supervisors of the County of San Bernardino, and; (2) any and all required filing fees assessed pursuant to California Fish and Game Code Section 711.4, together with any required handling charges, are paid to the Clerk of the Board of Supervisors of the County of San Bernardino.

    a. The Applicant shall provide the Planning Division with a check for the appropriate fee, made payable to the Clerk of the Board of Supervisors, no later than 24 hours after receiving approval of the project. The City will file the NOD and fee payment with the County/State and will provide the Applicant with a copy of the receipt and filed NOD.

    b. Construction and operation of the proposed project shall be in compliance with the **attached Mitigation Monitoring and Reporting Program**.

11. Development Impact Fees shall be paid in accordance with City policy.

12. A reduction in the number of parking spaces required by Highland Municipal Code Section 16.52.030 *Schedule of off-street parking requirements*, is approved as validated by the project parking study. The project shall provide no less 129 permanent, striped, parking spaces. These shall generally be comprised of 65 standard spaces, 2 vanpool, 44 compact, 7 ADA, 6 clean air vehicle and 7 electric vehicle spaces and accommodate parking and storage for approximately eleven (11) bicycles as required by Highland Municipal Code Section 10.24.010. Minor modifications may be made as authorized by the Community Development Director.

13. If the warehouse is ever split between two or more users, a reciprocal access agreement shall be recorded to permit shared cross property access for vehicle circulation between Victoria Avenue and Grape Street.

14. The design and installation of the Signs shall be in accordance with Chapter 16.56, Sign Regulations, of the Highland Municipal Code, unless otherwise approved by the Planning Commission.

Mitigation Monitoring and Reporting Program
Initial Study/Mitigated Negative Declaration
6th Street and Victoria Avenue Warehouse Project

Lead Agency:

City of Highland
27215 Base Line
Highland, California 92346
Contact: Kim Stater, Assistant Community Development Director

Prepared for:

Patriot Development Partners
12126 West Sunset Boulevard
Los Angeles, California 90049
Contact: Kevin Rice, Principal

Prepared by:

DUDEK
27215 Base Line
Highland, California 92346
Contact: Sean Kilkenny, Senior Project Manager

NOVEMBER 2021

Printed on 30% post-consumer recycled material.

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1 Introduction

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

This Mitigation Monitoring and Reporting Program (MMRP) will be used by the City of Highland (City) to ensure compliance with adopted mitigation measures identified in the MND for the proposed 6th Street and Victoria Avenue Warehouse Project (project) when construction begins. The City, as the lead agency, will be responsible for ensuring that all mitigation measures are carried out. Implementation of the mitigation measures would reduce impacts to below a level of significance for air quality, biological resources, cultural resources, geology and soils (paleontological resources), hazards and hazardous materials, and tribal cultural resources.

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

City of Highland
Planning Department
27215 Base Line
Highland, California 92346

2 Mitigation Monitoring and Reporting Program Table

Table 1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
Air Quality				
MM-AQ-1: Fugitive Dust Watering. To reduce the potential for criteria air pollutants, specifically fugitive particulate matter with an aerodynamic diameter less than or equal to 2.5 microns ($PM_{2.5}$), as a result of construction of the project, the applicant shall: Comply with SCAQMD rules and regulations regarding emissions generated during construction activities. Rule 403, Fugitive Dust,[1] requires the implementation of measures to control the emission of visible fugitive/nuisance dust, such as wetting soils that would be disturbed. By rule, active sites would be watered at least two times daily, resulting in an approximately 55% reduction of fugitive dust (CalEEMod default value), to further control fugitive PM2.5, the project applicant, or its designee, shall water active sites at least three times daily resulting in an approximately 61% reduction of fugitive dust (CalEEMod default value).	During construction	Project applicant and their construction contractor	City of Highland Building & Safety Division	
MM-AQ-2: Tier 4 Interim Engines. To reduce the potential for criteria air pollutants, specifically particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM_{10}), as a result of construction of the project, the applicant shall:	Prior to and during construction	Project applicant and their construction contractor	City of Highland Building & Safety Division	

[1] SCAQMD Rule 403 requires implementation of various best available fugitive dust control measures for different sources for all construction activity sources within its jurisdictional boundaries. Dust control measures include, but are not limited to, maintaining stability of soil through pre-watering of site prior to clearing, grubbing, cut and fill, and earth-moving activities; stabilizing soil during and immediately after clearing, grubbing, cut and fill, and other earth-moving activities; stabilizing backfill during handling and at completion of activity; and pre-watering material prior to truck loading and ensuring that freeboard exceeds 6 inches. While SCAQMD Rule 403 requires fugitive dust control beyond watering control measures, compliance with Rule 403 is represented in CalEEMod by assuming two times daily watering of active sites (55% reduction in PM_{10} and $PM_{2.5}$ [CAPCOA 2017]).

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
Prior to the start of construction activities, ensure that all 75 horsepower or greater diesel-powered equipment are powered with CARB-certified Tier 4 interim engines, except where the project applicant establishes to the satisfaction of the City of Highland (City) that Tier 4 interim equipment is not available. An exemption from these requirements may be granted by the City in the event that the City documents that equipment with the required tier is not reasonably available and corresponding reductions in criteria air pollutant emissions are achieved from other construction equipment. Before an exemption may be considered by the City, the applicant shall be required to demonstrate that two construction fleet owners/operators in San Bernardino County were contacted and that those owners/operators confirmed Tier 4 interim equipment could not be located within San Bernardino County.				
Biological Resources				
MM-BIO-1: Nesting Birds. Commencement of construction activities shall avoid the February 1 through August 31 bird nesting season to the greatest extent feasible. If construction activities must begin within this nesting season, a survey for nesting birds shall be conducted by a qualified biologist within 72 hours before commencement of construction activities. The area surveyed shall include all clearing/construction areas, as well as areas within a 500-foot buffer around the site, or as otherwise determined by the biologist. If no active bird nests are identified on, or within the 500-foot buffer, no further action is necessary and construction activities could commence. If active nests are found during pre-construction surveys or at anytime throughout the course of construction	Prior to and during construction	Project applicant and their construction contractor	City of Highland Planning Division	

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
activities during the nesting bird season, all clearing/construction activities within a minimum 100 feet of the nest shall be postponed until a wildlife biologist has identified the nesting species. If the avian species is protected under the Migratory Bird Treaty Act and/or the California Fish and Game Code, a minimum buffer zone shall be established by the qualified biologist based on the type of bird/raptor species identified and the construction buffer shall be established on site through the erection of cones/flagging/fencing to clearly delineate the protection zone. All construction activities shall avoid this protection zone until a qualified biologist has confirmed that the nest(s) is no longer active, the nest is vacated, and there is no evidence of second nesting attempts.				
Cultural Resources				
MM-CUL-1: Preparation of a Cultural Resources Monitoring Plan A qualified archaeological principal investigator, meeting the Secretary of the Interior's Professional Qualification Standards, shall prepare a Cultural Resources Monitoring Plan (CRMP) in consultation with Tribes that requested consultation under AB 52. 2. The CRMP shall include a requirement for all construction personnel to complete a WEAP training prior to commencement of construction activities as outlined in MM-CUL-2. The CRMP shall stipulate the location and timing of archaeological and Native American monitoring based on MM-CUL-3. The qualified archaeologist principal investigator shall review engineering plans for the project to determine where ground disturbing activities will exceed the depths of artificial fill within the project site to determine the timing and locations of monitoring to be included in the CRMP. The CRMP shall include monitoring protocols to be carried out during project-related construction. The CRMP shall	Prior to construction	Project applicant and their construction contractor	City of Highland Planning Division	

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
stipulate a Native American monitor, associated with any of the Tribes that have been consulted with under AB 52, be retained to monitor project-related ground disturbance stipulated in the CRMP. The CRMP shall contain an allowance that the qualified archaeologist principal investigator, based on observations of subsurface soil stratigraphy or other factors during initial grading, and in coordination with the Native American monitor(s) and the City, may reduce or discontinue monitoring as warranted if it is determined that the possibility of encountering archaeological or tribal cultural deposits is low. The CRMP shall outline the appropriate measures to be followed in the event of unanticipated discovery of cultural and tribal cultural resources during program implementation, including that all ground disturbance within 60 feet of an unanticipated discovery shall cease until a treatment plan is developed by the qualified archaeologist principal investigator in coordination with the City and the Native American monitor(s) and which will consider the resources archaeological and tribal value. The CRMP shall identify avoidance as the preferred manner of mitigating impacts to cultural resources. The CRMP shall establish the criteria utilized to evaluate the significance (per CEQA) of the discoveries, methods of avoidance consistent with CEQA Guidelines Section 15126.4(b)(3), as well as identify the appropriate treatment to mitigate the effect of the project if avoidance of a significant resource is determined to be infeasible. The plan shall also require the preparation of a monitoring report following the completion of all ground disturbing activities for the project. The monitoring report will be submitted to the City for review and comment and a final copy will be filed at the SCCIC. The CRMP shall be submitted to the City and the appropriate Native American representatives who have been consulted with under AB 52 for review prior to the City's issuance of a grading permit and the start of project-related ground disturbance.				

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
MM-CUL-2: All construction personnel and monitors who are not trained archaeologists shall be briefed regarding inadvertent discoveries prior to the start of construction activities. A basic presentation and handout or pamphlet shall be prepared in order to ensure proper identification and treatment of inadvertent discoveries. The purpose of the Workers Environmental Awareness Program (WEAP) training is to provide specific details on the kinds of archaeological materials that may be identified during construction of the project and explain the importance of and legal basis for the protection of significant archaeological resources. Each worker shall also learn the proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the site supervisor and archaeological monitor.	Prior to construction	Project applicant and their construction contractor	City of Highland Planning Division	
MM-CUL-3: A qualified archaeologist shall be retained and on-call to respond and address any inadvertent discoveries identified for the duration of construction activities. Additionally, in consideration of the potential to encounter intact cultural deposits beneath fill soils, the qualified archaeologist shall monitor ground disturbing activities between 12–18 inches below current grade and shall survey the project site once fill soils have been removed to ensure no cultural deposits underly the fill layer. A qualified archaeological principal investigator, meeting the Secretary of the Interior's Professional Qualification Standards, shall oversee and adjust monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) based on the observed potential for construction activities to encounter cultural deposits or material. The archaeological monitor will be responsible for maintaining daily monitoring logs.	During construction	Project applicant and their construction contractor	City of Highland Planning Division	

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
In the event that potential prehistoric or historical archaeological resources (sites, features, or artifacts) are exposed during construction activities for the project, all construction work occurring within 60 feet of the find shall immediately stop and a qualified archaeologist must be notified immediately to assess the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find, the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work as outlined in the Cultural Resources Monitoring Plan (MM-CUL-1) may be warranted. If resources are determined to be tribal cultural resources in nature, MM-TCR-2 shall be implemented. Within 60 days following completion of ground disturbance and submitted to the City for review. This report shall document compliance with approved mitigation, document the monitoring efforts, and include an appendix with daily monitoring logs. The final report shall be submitted to the South Central Coastal Information Center and interested consulting tribes.				
Geology and Soils				
MM-GEO-1: Discovery of Paleontological Resources. In the event that paleontological resources (i.e., fossil remains) are exposed during construction activities for the project, all construction work occurring within 50 feet of the find shall immediately stop until a qualitied paleontologist, as defined by the Society of Vertebrate Paleontology's guidelines, can assess the nature and importance of the find. Depending on the significance of the find, the qualified paleontologist may record the find and allow work to continue or may recommend salvage and recovery	During construction	Project applicant	City of Highland Planning Division	

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
of the resource. All recommendations shall be made in accordance with the Society of Vertebrate Paleontology's guidelines and shall be subject to review and approval by the City of Highland. Work in the area of the find may only resume upon approval of a qualified paleontologist				
Hazards and Hazardous Materials				
MM-HAZ-1: Prior to the issuance of building permits, the project applicant shall retain a qualified contractor to remove and dispose of contaminated soil in the vicinity of the automotive repair area at 7824 Victoria Avenue and in the vicinity of the concrete pad at 26462 6th Street, as identified in the December 2020 *Phase I Environmental Site Assessment and Limited Phase II Soil Investigation 7809 Grape Street, 7834 Victoria Avenue, 26432 6th Street, and Assessor's Parcel Numbers: 1192-281-09 and 1192-281-14, Highland, California 92346*, prepared by Hazard Management Consulting, or any updates to that report. The removal, transport, and disposal of refuse shall be done in accordance with all applicable local, state, and federal guidelines related to hazardous materials handling. A summary of the soil removal and disposal activities shall be provided to the City of Highland within a reasonable timeframe following completion of these activities.	Prior to issuance of building permits	Project applicant	City of Highland Building & Safety Division	
Tribal Cultural Resources				
MM-TCR-1: Retain a Native American Monitor Prior to Commencement of Ground Disturbing Activities The project applicant shall make a good faith effort to retain a Native American monitor prior to the start of any project-related ground-disturbing activities. The Native American monitor shall be notified by the project applicant of the time and location of the Worker Environmental	Prior to construction	Project applicant and their construction contractor	City of Highland Planning Division	

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
Awareness Program (WEAP) training no more than 72 hours prior to its scheduled occurrence.				

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City of Highland

Engineering Department
Conditions of Approval
(CUP 21-007 & DRA 21-005 & TPM 20384) Patriot NWC of 6th Street and Victoria Avenue

---

A - Required Prior to Map Approval
B - Required Prior to Building Permit/Construction
C - Required Prior to Building Occupancy
D - Ongoing
E - Required Prior to Grading Permit
* - Non Standard Conditions

Soils/ Geology/ Grading

E 1. Design grading and landscaping plans to comply with the City's clear sight triangle criteria at public street intersections and at private driveways. Walls, fencing, monument signs, slope, and landscaping, within the clear sight triangle, must not exceed thirty inches in height measured from the flowline of the street, unless a sight distance analysis that demonstrates sight distance is adequately maintained is submitted to and approved by the City Engineer.

B 2. Submit a preliminary soils report, prepared by a licensed Geotechnical Engineer, for review and approval by the City Engineer. Comply with the recommendations contained in the report and any amendments thereof as approved by the City Engineer.

E 3. Submit rough and/or precise grading plans to the City Engineer for review and approval. Comply with the City of Highland grading standards as shown on the grading plan checklist.

B 4. Submit the structural design and location for any required retaining walls for review and approval by the City Engineer. Construct concrete v-ditches and drainage system at the back of retaining walls in accordance with the Grading Plan Checklist and as required by the City Engineer.

E 5. Submit an erosion control plan to minimize potential increases in erosion and sediment transport during construction activity for City Engineer approval. Place erosion control measures during or after grading work as required by the City Engineer.

E 6. Design short-term erosion control in accordance with Best Management Practices such as, hydroseeding, mulching, jute matting or plastic sheeting to protect slopes; silt fencing to control site perimeter; and straw bale barriers, sand bag barriers, rock filters or sediment basins to control internal erosion, or other methods to stabilize disturbed areas, as approved by the City Engineer.

D 7. Implement dust control measures during construction activities including, but not limited to, daily watering of construction area as frequently as necessary during active and inactive periods, utilizing soil emulsions, limiting construction vehicle speed to 10 miles per hour, stabilizing construction entrances to prevent trackout of sediments, and street sweeping.

E 8. Design grading to intercept and conduct off-site tributary drainage flow around or through the project site in a manner that does not adversely affect adjacent properties. Conveyance of on-site and off-site tributary flows shall be maintained by the underlying property owner.

E 9. Design grading to drain the entire area of the project to the proposed Water Quality Management Plan (WQMP) infiltration basins and to accommodate overflows as necessary.

E* 10. Plot all existing and proposed easements on grading plan and note disposition of any existing utilities, appurtenances, fences, and access roads.

D* 11. Construct temporary sedimentation basins for use during the grading and construction period of the project. Do not start using the proposed infiltration basins until the site is stabilized for erosion and sedimentation.

B 12. Submit original wet signed and stamped rough grading certifications from the soils engineer and the grading engineer, along with compaction reports, to the City Engineer.

C 13. Submit original wet signed and stamped final grading certification from the grading engineer, to the City Engineer.

STREET IMPROVEMENT

E* 14. Remove existing overside drain, earthen drainage ditch, curb and gutter along westsdie of Victoria Avenue and construct new street improvements across the entire Victoria Avenue frontage of the project. Construct new street improvements including, but not limited to, 6" curb and gutter located 40' west of street centerline, 6'-wide curb-adjacent sidewalk, commercial drive approaches at locations determined in final engineering, and street lights. Design the limits and extent of removal of existing improvements, and construction of transitional improvements, as directed by the City Engineer.

E* 15. Construct new asphalt concrete pavement with class II aggregate base improvements to centerline of Victoria Avenue (T.I.=9) asphalt concrete pavement with class II aggregate base. Construct a 4" mill and fill for the northbound #1 on Victoria Avenue. Design the limits and extent of removal of existing improvements, and construction of transitional improvements, as directed by the City Engineer.

E* 16. Remove existing improvements along northside of 6th Street and construct new street improvements across the entire 6th Street frontage of the project. Construct new street improvements including, but not limited to, 6" curb and gutter located 22' north of street centerline, 6'-wide curb-adjacent sidewalk, and street lights. Design the limits and extent of removal of existing improvements, and construction of transitional improvements, as directed by the City Engineer.

E* 17. Construct new asphalt concrete pavement with class II aggregate base improvements to centerline of 6th Street (T.I.=8) asphalt concrete pavement with class II aggregate base. Design the limits and extent of removal of existing improvements, and construction of transitional improvements, as directed by the City Engineer. Eastbound 6th Street, south of centerline, will be rehabilitated by others at the end of EVWD's SNRC project.

E* 18. Remove existing improvements along eastside of Grape Street and construct new street improvements across the entire Grape Street frontage of the project. Construct new street improvements including, but not limited to, 6" curb and gutter located 26' east of street centerline, 6'-wide curb-adjacent sidewalk, and street lights. Design the limits and extent of removal of existing improvements, and construction of transitional improvements, as directed by the City Engineer.

E* 19. Construct new asphalt concrete pavement with class II aggregate base improvements to 12' west of centerline of Grape Street (T.I.=8) asphalt concrete pavement with class II aggregate base. Design the limits and extent of removal of existing improvements, and construction of transitional improvements, as directed by the City Engineer.

C* 20. Construct commercial drive approaches with curb returns per City Standard 213. Note 4.5' sidewalk easement will be required back of commercial drive approach (Std. 213).

C 21. Construct private ingress/ egress improvements at the northerly of Grape Street driveway to permit right in and left out only truck movement.

E 22. Submit engineering plans for street improvements and signing & striping to the City Engineer for review and approval. Indicate the location of any existing utility/facility which would affect construction on plans and profiles. Comply with the City design standards as shown on the street and storm drain improvement checklist. Provide ADA access to site from right of way.

C 23. Install traffic control signs and pavement markings, with locations and types approved by the City Engineer. Modify Victoria Avenue striping to provide northbound left turn pocket at the northerly truck entrance, per City Standards.

B 24. Design and construct public improvements including sidewalk, driveway approaches and access ramps in accordance with all requirements of the State of California Accessibility Standards, Title 24 California Administrative Code. Redesign and reconstruct existing frontage improvements if found not in compliance with City Standards.

C* 25. Install new LS3 metered street light system along the project frontages. The new street lights, electrical conduits, wiring and meter etc. will be owned and maintained by the City. The street lights shall be equipped with a Light Emitting Diode (LED) luminaire on a marbelite pole with types and at the location specified by the City Engineer. Pay the City street lighting energy and maintenance charges for the initial 12 months.

C 26. Submit "Record Revisions" to all plans to reflect the improvements as constructed, and any changes made during construction.

WATER QUALITY/ DRAINAGE

E 27. Obtain approval by the City Engineer of a Final Water Quality Management Plan (F-WQMP), prepared in accordance with the City's National Pollutant Discharge Elimination System (NPDES) permit requirements in effect at the time the Conceptual Water Quality Management Plan was approved unless subsequent City NPDES permits require otherwise. The F-WQMP shall (1) be prepared, signed, and sealed by a licensed Civil Engineer, (2) include Site Design Low Impact Development and Source Control Best Management Practices (BMPs) appropriate for residential development, (3) include a BMP implementation, operation, and funding mechanism, and (4) be certified by the property owner. The property owner shall also enter into a Stormwater BMP Transfer, Access, and Maintenance Agreement with the City on standard City form. Include a copy of the

recorded agreement in the F-WQMP. Construct BMPs in accordance with the approved F-WQMP.

C* 28. Construct and implement site design BMPs specified in the project approved F-WQMP including, but not limited to, pretreatment devices approved at time of C-WQMP approval, underground infiltration systems, and raised curb landscaped areas and parking lot islands. Alternate site design BMPs which are equally effective may be submitted for review and approval by the City Engineer.

E 29. Include the project grading plan, landscape plan and utility plan with the first submittal of the F-WQMP.

C 30. Submit two sets of WQMP BMP Exhibits with a "WQMP BMP As-Built Certificate" wet signed and sealed by the Engineer of Record. The Certificate shall state:

"I hereby certify that the Water Quality Management Plan Best Management Practices have been constructed under my supervision in accordance with the approved plans and are functional to the best of my knowledge."

C* 31. Construct on-site private drainage system, HDPE or other pipe material as approved by City Engineer, to drain the entire project site to the proposed WQMP BMPs in accordance with the approved Final Water Quality Management Plan, and construct necessary drainage overflow facilities. Construct an overflow pipe to convey any overflow from the proposed underground infiltration system to 6th Street as necessary.

B 32. At the underground infiltration system proposed by the Final WQMP, conduct at least two new infiltration tests using a double-ring infiltrometer. The tests shall be conducted at the proposed chamber system subgrade elevation, prior to the submittal of the F-WQMP. After obtaining the results from the two tests, the engineer and geotechnical engineer shall determine if additional testing is required.

C 33. Register the underground chambers with EPA as a Class V Injection Well.

E 34. Submit a hydrology study to determine storm runoff quantities tributary to and generated by the Project for review and approval by the City Engineer. Include hydraulic calculations to determine the size and type of all drainage facilities.

E 35. Submit engineering plans for public and private drainage systems to the City Engineer for review and approval. Indicate the location of any existing utility facility which would affect construction on plans and profiles. Comply with the City design standards as shown the street and storm drain improvement checklist.

E 36. Construct Victoria Avenue catch basin at existing sump and location of overside drain. Construct public storm drain outlet from new catch basin to convey captured flows from the westside of Victoria Avenue into the existing culvert at the west side of the 6th Street and Victoria Avenue intersection. Construct storm drain stub out from this storm drain to connect to future drainage improvements planned and designed to be constructed at the ultimate configuration of the 6th Street and Victoria Avenue intersection as directed by the City Engineer.

DEDICATION/ANNEXATION

C* 38. Apply to the City to annex the project into the City's Consolidated Landscape District (LMD) for potential City maintenance of parkway and frontage landscaping along 6th Street and Victoria Avenue. The City will maintain parkway and frontage landscaping utilizing LMD revenue only if the City determines that adequate maintenance is not being provided by the property owner. The potential future amount of assessment will include the estimated on-going maintenance cost and one-time construction cost to convert the privately-maintained system to the City-maintained system.

C* 39. Apply to the City to annex the project into the City's Landscape Maintenance District (LMD) for maintenance of future median landscaping along Victoria Avenue median. Sign the ballots prepared by the City agreeing to the annexation, and the potential future amount of assessment. Assessment for Victoria Avenue median landscaping will commence the year Victoria Avenue median is constructed by the City or other future developments. Landscaping within the median shall be maintained by the City.

B* 40. Dedicate an irrevocable offer of dedication, (1) a 10-foot wide minimum landscape easement across the Victoria Avenue and 6th Street frontage, in addition to the required street right-of-way, as approved by the City Engineer, (2) a temporary construction easement granting permission for the City to enter the property to construct and restore landscaping. The exact dimensions of the landscape easement will be determined at the time on-site improvement plans have been prepared.

E* 41. If the site is ever subdivided in the future, the Project will be required to grant a reciprocal private easement in favor of the parcels created for vehicular access, including emergency access.

A* 42. If the site is ever subdivided in the future, record a reciprocal private easement for drainage, and utilities.

B 43. Record a Final Map with the San Bernardino County Recorder pursuant to the provisions of the State Subdivision Map Act. Submit a duplicate photo mylar of the map recorded with the San Bernardino County Recorder.

A 44. At the time of Final Map submittal, include traverse calculation sheets which show error of closure, copies of recorded maps and deeds used as reference and/or showing original land division, tie notes and bench marks referenced, and a current title report. Inverse calculations will not be accepted for plan check.

A 45. Include an Improvement Certificate/Statement on the Parcel Map in accordance with Section 66411.1 of the Subdivision Map Act.

FEES/PERMITS

C* 46. Pay an in lieu fee for the design and construction of the future raised landscape median along the project frontage of Victoria Avenue, as determined by the City Engineer.

C* 47. Pay an in lieu fee for the design and construction of the future traffic signal at 6th Street and Victoria Avenue, as determined by the City Engineer.

C* 48. Pay City processing fee for application of Development Impact Fee (DIF) credits for street, drainage, and median improvements pursuant to adopted City Council DIF Credit Policy.

D 49. Pay appropriate Engineering fees for district annexation, plan check, WQMP review, traffic report review, hydrology study review, structural calculation review, on-site and off-site inspection, utility excavation permits, GIS map plan update, microfilming and storage of maps and plans, and other required fees.

D 50. Obtain a permit from Engineering prior to any on-site construction or construction within the public right-of-way and obtain permit from Caltrans prior to any construction within or impacting Caltrans Access Control areas.

E 51. Post a deposit for erosion control which shall not be released prior to completion of all on-site construction.

A 52. Post a deposit for monumentation based on an estimate of the cost to perform the work by the project surveyor or engineer. The deposit shall not be released prior to written verification from the surveyor or engineer that the monuments have been set and payment for the work has been received.

UTILITIES/ CONSTRUCTION

E 53. Obtain written permission from the adjoining property owners for offsite grading and/or construction, if any.

B 54. Install construction fencing and screening in accordance with Building and Safety Division Policy 335.

C 55. Reconstruct existing public improvements removed or damaged during construction. Pavement repair, which may include A.C. overlay, T-cut trench repair and/or slurry seal after removal of existing striping shall be across all or a portion of damaged pavement caused by this project as determined by the City Engineer.

C 56. Coordinate, and where necessary, pay for the relocation of any existing public utilities as necessary.

C 57. Provide all utility services to each building, including sanitary sewers, water, electric power, gas, cable TV, internet, and telephone. All utilities listed under Highland Municipal Code Section 16.40.380 (A) are to be underground per Ordinance 315.

E 58. Comply with applicable requirements of the National Pollutant Discharge Elimination System (NPDES) permit program. Provide written verification from the Regional Water Quality Control Board specifying the projects WDID number.

B 59. Destroy any abandoned wells on the property or similar structures that might result in contamination of underground waters in a manner approved by the City Engineer.

B 60. All underground structures, except those desired to be retained, must be broken in, backfilled, and inspected before covering.

D 61. Comply with the prevailing City design and construction standards and requirements at the time of permit issuance.

B 62. Design and construct a trash enclosure per City Standard 700.

C 63. Install telephone, cable television, and internet enclosures underground whenever the underground installation is an available option offered by the utility companies. If the underground installation is not an available option and utility enclosures must be installed above ground, install the above-ground utility enclosures and any flush mount utility enclosures at locations where construction of retaining walls will not be necessary for compliance with the setback requirements of the utility companies.

B* 64. Submit a Composite Utility Plan indicating the location of all above ground and flush mount water, electric, cable TV, internet, and telephone utility structures prior to City issuance of utility permits.

B 65. Underground existing overhead utilities along Victoria Avenue and Grape Street frontages per Ordinance 434.

Building and Safety Division Conditions of Approval

Date:	July 5, 2021
Project:	307,429 sq/ft warehouse building – NWC of 6th st and Victoria Ave.
Applicant:	Bridget Herdman
Site Location:	North West Corner of 6th Street and Victoria Ave.
Project Numbers:	**CUP:** 21-007, **DRA:** 21-005, **TPM:** 21-002
APN:	1192-281-09, 1192-281-10, 1192-281-11, 1192-281-12, 1192-281-13, 1191-281-14

1. Please provide the following number of construction plans and documents listed below for the first review of the proposed project. The initial plan review time will take two weeks on most projects. The applicant will receive an application number at the time plans are submitted for Building & Safety's plan review. This number is needed to obtain information regarding your project.

    (3) Architectural Plans
    (3) Structural Plans
    (2) Structural Calculations
    (3) Plot/Site Plans
    (3) Electrical Plans
    (3) Electrical Load Calculations
    (3) Exiting Plans
    (3) Plumbing Plans/Isometrics
    (3) Mechanical Plans
    (3) HVAC Duct Layout Plans
    (2) Roof and Floor Truss Plans
    (2) Title 24 Energy Calculations
    (2) Geology Report
    (2) Soils Report
    (3) Precise Grading Plans (For Reference)
    (3) Site Disabled Access Plan
    (3) Condition of Approval Packages (Include within Plan Sets)
    (3) Temporary Fence Plan
    (1) Approved Health Department Plans
    (2) Energy Commissioning Plan

2. All structures shall be designed in accordance with the current version of the California Building Codes, including the California Green Building Standards Code. Design all structures to comply with Seismic Design Category D, basic wind speed 96 MPH, at exposure "C", and Energy Climate Zone 10.

3. All onsite utilities are to be underground. As approved by the Planning Division, utility cabinets and transformers are exempt.

4. Construction projects requiring fire permits must apply and submit fire plans prior to the issuance of the building permit, including fire sprinkler submittals.

5. Building and Safety does not release all meters until final approvals are obtained from all agencies and departments. Policy 295.

6. It has come to the City's attention that premature failures have occurred in copper piping when used within the City of Highland, particularly east of City Creek. Property Owners, Contractors and Developers are advised to analyze soil and water compositions when considering the type of pipe material to be utilized. City staff makes no recommendations on which Plumbing Code approved products or methods to be utilize, this is the responsibility of the property owner or contractor. Alternate unapproved code materials may be submitted for City approval at the time of plan submittal via an alternate material and methods application.

7. The Developer/Owner is responsible for the coordination of releasing any Deferral of Development Impact Fees or Bonds after such fees have been paid. The Developer/Owner should be aware, once the deferral notice is sent to the San Bernardino County Recorder's Office; the release process takes two to three weeks. This process will delay final Certificates of Occupancy.

8. The Developer/Owner is responsible for the coordination of the final occupancy. The Developer/Owner shall request clearances from each department and/or agency at least two weeks prior to requesting a final building inspection from Building and Safety. Each agency shall sign the back of the Building and Safety Job Card, or provide agency approved signed documentation, and provide a copy of the signatures to Building and Safety at the time the final inspection is requested.

9. Building and Safety inspection requests must be made by 4:00 pm. on the previous City working day to receive a next business day inspection. Please contact (909) 864-2136, Ext 228.

10. A security fence with screening shall protect all construction sites. The fencing and screening shall be maintained at all times to protect pedestrians. All development projects shall submit a construction fencing plan with the construction design plans. Construction projects that have phased occupancy shall be completely separated by a construction fence that is screened and show the adjusted fence locations at each phase.

11. On site toilet facilities shall be provided for construction workers and such facilities shall be maintained in a sanitary condition. Construction toilet facilities of the non-

sewer type shall conform to ANSI ZA.3 and on site per NPDS stormwater requirements.

12. All construction materials, which are not used, shall be recycled pursuant to the requirements set forth by Ordinance No. 269. Receipts from the recycle company responsible for picking up the materials shall be kept in the construction office. After the construction is complete and before final occupancy, the trash receipts shall be forwarded to the City Public Services division.

13. Construction projects, requiring temporary electrical power, shall obtain an electrical permit from Building and Safety. No temporary electrical power will be granted to a project unless the following item is in place and approved by Building and Safety and the Planning Division.

    a) Installation of a construction trailer through the "Temporary Occupancy Permit", alternatively, a security fenced area where the electrical power will be located. Installation of construction/sales trailers must be located on private property. No trailers can be located in the street unless a permit from the Engineering Department is obtained.

14. Prior to the issuance of Building Permits, on site water service shall be installed and approved by the responsible agency. On site fire hydrants shall be approved by the Fire Department. No flammable materials will be allowed on the site until the fire hydrants are established and approved. No flammable construction materials shall be placed on the site without approvals by the Fire Department. All street and access roadways around the project shall be paved for emergency response vehicles before flammable materials are placed on the project.

15. Prior to issuance of building permits, site-grading certifications, compaction reports, and survey report shall be submitted to Building and Safety or to Public Works, as applicable.

16. Prior to issuance of building permits, provide a receipt from the appropriate Unified School District stating that all school fees have been paid.
    (San Bernardino Unified School Districts)

17. Prior to final inspection, provide Building & Safety with a flash disk of the approved plans and documents.

18. Final approvals from all applicable outside agencies and internal departments and divisions are required prior to Building and Safety permit final and occupancy approval.

19. All construction projects shall comply with the NPDES Stormwater Best Management Program. Prior to building permit issuance submit copy of the Water Quality Management Program Report. (WQMP)

20. All deferred plan items are to be identified on the plans cover sheet.

21. Final approvals from all applicable outside agencies and internal departments and divisions are required prior to Building and Safety permit final and occupancy approval.

22. Site development and grading shall be designed to provide access to all entrances and exterior ground floor exits and access to normal paths of travel. The accessible route(s) of travel shall be the most practical direct route.

23. All dead and removed trees and foliage is to be properly removed from the site.

24. The City enforces the State of California provisions of the California Building Code disabled access requirements. The Federal Americans with Disabilities Act (ADA) standards may differ in some cases from the California State requirements; therefore it is the building owner's responsibility to be aware of those differences and comply accordingly.

25. At the time of submittal for plan review, projects meeting the requirements under Section 5.410.2 and Section 5.410.2.3 of the California Green Building Standards Code shall submit a Commissioning Plan.

26. Prior to final inspection, provide Building & Safety with a flash disk of the final approved amended plans and documents.

Comments pertaining to the project/ preliminary drawing plans:

27. Demolition permits shall be obtained for all structures to be demolished (Parcels 1191-281-10, 1191-281-11, 1191-281-13, 1191-281-14)

28. The trash enclosure shall be accessible to persons with disabilities and located on an accessible route. The accessible route shall extend from the trash enclosure to the building it serves. Detail accessible route on plans. (CBC Section 11B-206.2.2)

City of Highland, **FIRE PREVENTION DIVISION,** Conditions of Approval.

DATE : September 27, 2021

APPLICANT : Bridget Herdman

ADDRESS : 1192-281-09, 1192-281-10, 1192-281-11, 1192-281-12, 1192-281-13, 1192-281-14.

SITE LOCATION: North of 6th Street between Victoria Avenue and Grape Street

FILE / INDEX No.: CUP 21-005 DRA 21-005 TPM 21-002

A tiered level of mitigation options has been developed and listed below are the systems and/or modifications required for your project. Compliance of the following items are a condition of **FINAL OCCUPANCY APPROVAL**. These conditions are required as acceptable solutions to the adverse fire conditions impacting firefighting and emergency operations accompanying the site/area. They will either assist in detection and extinguishment of the fire and/or facilitate the anticipated emergency operations.

This project is protected by the City of Highland Fire Department / Cal-Fire / California Department of Forestry and Fire Protection. Prior to any construction occurring on any parcel, the applicant shall contact the city of highland fire marshal office for verification of current fire protection development requirements. All new construction shall comply with the currently adopted California Fire Code and all applicable statutes, appendices, codes, ordinances, standards and policies of the City of Highland Fire Department/ Fire Prevention Division / Cal-Fire / California Department of Forestry and Fire Protection.

Fire Department Review of all projects is required.

ALL CONSTRUCTION (New and renovations to existing) SHALL COMPLY WITH THE CALIFORNIA FIRE CODE Along with amendments as adopted within the Highland Municipal Code (Ord. #411).

Note: All weather access roads (CFC) and fire hydrant/water system installations shall be in place, inspected and approved, **PRIOR** to combustible material being brought on site.

Note: The City of Highland has 2 areas within the '**FIRE SAFETY OVERLAY DISTRICT**' designated as **FR-1** and **FR-2**. Both areas may border or overlap areas identified by the State/CalFire as '**High Fire Severity Zone**' or '**Very High Fire Severity Zone**'. See **HMC** for construction requirements.

GENERAL.

1. **HF3:** A fuel break of one hundred (100) feet (brush and weed clearance) is required prior to construction. The clearance shall be maintained on a year-round basis. **CFC & HMC**

2. **HF31:** Approved fire hydrant pavement markers (blue dots) shall be installed at every hydrant.

3. **HF51:** The main electrical panel and all sub-panel(s) shall be labeled on inside cover for all circuits. **CEC**

4. **HF52:** Water heater (fuel fired), shall be properly vented to exterior of structure. Water heater shall be seismic strapped to wall and be located 18" above a garage floor. **CBC**

5. **HF55:** Commercial exit requirements:
   A. Required exit doors shall be maintained in an operable condition at all times
   B. Required exit doors shall swing outward and away in the direction of exit travel.
   C. Obstructions shall not be placed in the required width of an exit. Exits shall not be blocked or locked shut or obstructed in any manner during business hours.
   D. Exit paths shall be illuminated when structure is occupied.
   E. Exit path illumination shall be supplied from two (2) sources of power when occupant load is one hundred (100) persons or more.
   F. When exit way/exit pathway and/or exit doorway is not easily identified, additional exit signs shall be installed.

6. Exit signs shall be internally or externally illuminated by two lamps or shall be of the self-luminous type. **CFC; CBC**

7. **HF60:** Additional plans for access, fire safety systems, fire lanes and signage, gates, storage, or other special conditions may be requested for review, conditioning and approval by the fire marshal.

8. **HF56:** All flammable and combustible liquid storage and dispensing shall be in accordance with applicable sections of the **CFC, T-19** and city codes and ordinances.

9. **HF48:** A class "A" roof covering structure with "bird stops" shall be installed.

ACCESS:

10. **HF7:** Fire department **access** roads shall meet the fire dept. minimum unobstructed width of twenty (20) feet. (twenty-six (26) feet within FR-1&2 zones). **This standard shall not lessen other agency requirements.** Access roads shall be paved (asphalt/concrete) and in place **prior** to delivery of combustible building materials on site. Roads shall be designed and constructed to meet adopted city standards. **CFC**

11. **HF8:** All access roads, public, private streets and residential driveways shall maintain a minimum vertical clearance of thirteen (13) feet-six (6) inches. **CFC**

12. **HF10:** Driveways exceeding 150 feet shall have a fire department approved turn-around at the terminus. **CFC / APPENDIX D**

13. **HF11:** Fire department access roadway(s) and/or public/private street(s) exceeding one hundred fifty (**150**) feet in length shall provide an approved turn-around at the terminus (**cul-de-sac**). Minimum radius shall be **not less than forty (40)** feet. Or as approved by the fire marshal. Cul-de-sacs providing access to perimeter emergency access roads shall have a minimum radius of forty four **(44)** feet. **CFC / APPENDIX D, SBCO TRANSPORTATION STD**

14. **HF12:** Fire department access roadway(s); public/private street(s) and driveways shall not exceed 12% grade. **CBC / APPENDIX D, HMC**

15. **HF13:** Fire department access roadway(s); shall extend to within one hundred fifty (150) feet of and shall give reasonable access to all portions of the exterior walls of the first story of any building.
An access road, approved by the fire dept., shall be provided to within fifty (50) feet of all structures when the natural grade between access road and structure is in excess of 30%.
Where an approved access road cannot be provided, a fire protection system shall be required and approved by the fire department. **CFC**

16. **HF15:** "Phased" projects may be required to provide a minimum of two (2) remote points of approved access during construction. A secondary access, for fire and other emergency equipment and for routes of escape, which will safely handle evacuations. **CFC - APPENDIX D**

17. **HF19:** **Manually** operated gates across fire department access roadways, public and/or private streets and driveways, shall be equipped with approved emergency key-operated **"KNOX"** padlock or box containing key to open the private lock. For **automatic** gates, a "KNOX" emergency access switch, shall be installed, at location determined by fire department, and shall over-ride all command functions and open gate automatically upon activation. All automatic gates shall have a manual over-ride for use during loss of electric power. "KNOX BOX" request form

is available from the fire marshal or may be ordered directly from www.knoxbox.com (specify City of Highland, CA) **CFC – Appendix D Note: The city of Highland also requires an electronic "H" key system (Ord. #320) for multi-family, gated communities or secured storage facilities. HMC**

18. **HF24:** "NO PARKING – FIRE LANE" signs shall be posted at locations designated by fire marshal. Fire lane curbs shall be painted red, with white letters stating, "NO PARKING – FIRE LANE" on top, not face. **CFC - APPENDIX D**

19. **HF54:** Commercial and industrial structures-occupancies and gated complexes shall have a **"KNOX BOX"** system installed on the exterior of the building(s) or complex. location of device to be determined by the fire department. The box shall contain keys necessary to gain access and may contain pre-plans and MSDS information as required by the fire department. New and existing multi-tenant commercial buildings shall provide a 'KNOX' box large enough to contain keys to access each individual tenant space. Installation location(s) to be determined by the fire marshal. The box shall contain clearly marked keys to each tenant space or other areas as determined by the fire marshal. **CFC**

20. **HF61:** Aerial fire apparatus access roads. **Where required**: buildings or facilities **exceeding 30-feet** in height above the lowest level of fire dept. Vehicle access shall be provided access roads capable of accommodating aerial apparatus. **Width:** aerial apparatus access roads shall provide a minimum unobstructed width of **26-feet** in the immediate vicinity of any building exceeding 30-feet in height. **Proximity to buildings:** aerial apparatus access roads shall be located a minimum of 15-feet to a maximum of 30-feet from the building, and shall be positioned parallel to one entire side of the structure, as approved by the fire code official. **CFC APPENDIX D**

WATER:

21. **HF25:** Minimum required fire flow, as determined by California Fire Code Appendix 'B'.

System shall be looped with minimum eight (8) inch mains; six (6) inch laterals, six (6) inch risers; six (6) inch dia. Hydrants with two 2 ½" outlet(s) and one 4" outlet. **CFC APPENDIX B AND C**

Note: Hydrants shall meet EVWD standards.

22. **HF29:** Fire hydrant spacing shall be:
Commercial retail: 300 FEET
CFC / APPENDIX B AND C.

Note: Existing fire hydrants (off-site) can be included if they meet spacing requirements. Hydrants shall not be located at the 'bulb' end of cul-de-sacs.

23. **HF26:** Three sets of water delivery system plans, designed to meet the required fire flow for this project and/or development, shall be submitted to the fire department for review and approval. **CFC**

24. **HF27:** Applicant-developer shall provide a letter from the water company serving the project-development, verifying financial arrangements have been made and bonded for the required water improvements. **CFC**

25. **HF28:** Fire hydrants shall be installed, inspected and operational as per approved water system delivery plans **prior** to any framing, construction or delivery of combustible materials to project site. **CFC / CFC**

26. **HF30:** Private, on site fire hydrant(s) – yard hydrant(s)- capable of supplying required fire flow shall be installed at location(s) identified by the fire department. System shall be looped with minimum eight (8) inch mains; six (6) inch laterals, six (6) inch risers; six (6) inch dia. hydrants with one 2 ½" outlet and one 4" outlet. **CFC / APPENDIX B AND C**

27. **HF38:** Approved fire hydrant(s) capable of supplying required fire flow, shall be provided to all premises upon which facilities, buildings or portions of buildings are constructed or moved within the jurisdiction. When any portion of the facility or building protected is in excess of 150 feet from a fire hydrant on a public street, as measured by an approved route around the exterior of the facility or building, additional fire hydrants or on-site fire hydrants, meeting the required fire flow, shall be provided. **CFC APPENDIX B AND C**

ADDRESSING – IDENTIFICATION:

28. **HF21:** **Commercial** and **multi-family residential** address numbers shall be displayed on all **new and existing** structures in such a manner as to be plainly visible and legible from the access roadway or street. Numerals shall be of a contrasting color to the building and electrically illuminated.
Minimum size of the numerals shall be **8"** height, 3/4" stroke, or as approved by the fire marshal.
Industrial occupancies shall have address numbers of 12" height, 1" stroke and shall be electrically illuminated so as to be visible and legible from access roadway or street.
Note: Depending on height and setback of a building, larger numerals may be required and at additional locations on the building, as determined by a case-by-case review.
HMC

FIRE PROTECTION & ALARM SYSTEMS:

29. **HF36:** Automatic fire sprinklers shall be installed according to **NFPA 13** and fire dept. requirements. Submit three **(3)** sets of shop plans with material cut sheets and hydraulic calculations, indicating the type of occupancy, type of materials to be stored (if any), for fire dept. review and approval prior to any installation. Submit copy of California C-16 license. **CFC; CBC; HMC**

30. **HF37:** Automatic fire sprinkler control devices (P.I.V & O.S.&Y.) Shall be visible from fire dept. access roadway, and identify system being controlled and address of structure.
Fire Dept. Connection (FDC) shall be located no closer than forty (40) feet and not to exceed one hundred fifty (150) from structure. Required fire hydrant shall have a maximum distance from FDC of thirty (30) feet. FDC shall identify address and system of structure being protected. **CFC**

31. **HF41:** A minimum of one 2A-10BC fire extinguisher shall be installed for each 3,000 sq.ft. of floor area. Travel distance to any one fire extinguisher shall not exceed 75 feet. Additional fire extinguishers, size and class to be determined by fire department, may be required. Fire extinguishers shall be serviced bi-annually and shall have a current State Fire Marshall service tag attached. Fire extinguishers are to be serviced every two years and inspected & tagged every year. **CFC; NFPA**

32. **HF43:** An automatic fire detection and alarm system meeting the requirements of CFC 907, CBC and NFPA 72 shall be installed. Three (3) sets of shop plans with material cut sheets and calculations shall be submitted to the fire department for review and approval prior to installation. **CFC; CBC; NFPA**

33. **HF44:** An automatic smoke removal system shall be installed. The system shall comply with CFC and CBC requirements. Three (3) sets of shop plans with material cut sheets and calculations shall be submitted to the fire department for review and approval prior to installation. **CFC; CBC**

34. **HF45:** An automatic smoke ventilation system – fusible link type, shall be installed. Roof vent, venting ratios and draft curtains shall be provided. Three (3) sets of shop plans with material cut sheets and calculations shall be submitted to the fire department for review and approval prior to installation. **CFC**

35. **HF59:** Commercial and industrial buildings, in excess of 20,000 square feet, and with an interior area more than 150 feet from exterior exit, shall be equipped with a class i standpipe system. Standpipe connections shall be configured to reach any portion of interior space within 150 feet in any direction of travel. This system shall be calculated to provide 500 GPM from an adjacent automatic fire sprinkler riser at 100-psi nozzle pressure for two hand lines flowing.

36. **HF60:** California Fire Code, **FIRE SAFETY DURING CONSTRUCTION AND DEMOLITION**, shall apply to this project. it is the responsibility of the project manager to meet with the fire marshal to discuss requirements specific to this project.

37. **HF61**: **TENANT IMPROVEMENT**. Review the 'tenant improvement information' handout. If any of the items listed apply to this project, they must be included in the 'fire department notes' section on the plan.

38. **HF62**: Additional plans for access, fire safety systems, storage or other special condition may be requested for review, conditioning and approval by the fire marshal.

39. **HF63**: Submit to fire marshal's office: **one copy** of building and/or structure plans for fire department review.

40. **HF64:** Spray booths, spray finishing operations shall comply with requirements of California Fire Code

41. **Note:** Fire sprinkler design requirements for Spec warehouse buildings will change depending on type of occupancy, storage heights and/or commodities that are being used or handled.

Craig Sanchez, Fire Marshal
City of Highland Fire Prevention
(909) 864-8732 x 248

Attachment 3

Resolution No. 2021 - ___

Approving Variance VAR-021-01

RESOLUTION NO. 2021-___

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF HIGHLAND, CALIFORNIA, APPROVING VARIANCE VAR-21-001 TO ALLOW AN INCREASE IN THE MAXIMUM BUILDING HEIGHT IN THE BUSINESS PARK ZONE FROM 35' TO 45' IN ASSOCIATION WITH CONDITIONAL USE PERMIT CUP-21-007 AND DESIGN REVIEW APPLICATION DRA-21-005 TO CONSTRUCT A 305,617 SQUARE FOOT WAREHOUSE, LOCATED AT THE NORTHWEST CORNER OF 6TH STREET AND VICTORIA AVENUE (APNs: 1192-281-09 THROUGH 14)

APPLICANT: PATRIOT USICV VICTORIA, LLC (PATRIOT PARTNERS)

A. RECITALS

1. On June 16, 2021, the Applicant submitted a Variance Application (VAR-21-001) to allow an increase in the maximum building height in the Business Park Zone from 35' to 45' related to the construction of a 305,617 square foot warehouse. Related entitlements also submitted include Conditional Use Permit CUP-21-007, Design Review Application DRA-005, and Tentative Parcel Map No. 20384 (TPM-21-002).

2. The project site has a General Plan and Zoning Designation of Business Park (BP) which requires approval of a Conditional Use Permit for the establishment of a warehouse.

3. On December 21, 2021, the Planning Commission of the City of Highland, conducted a duly noticed Public Hearing on the Subject Application.

4. All legal prerequisites to the adoption of this Resolution have occurred.

B. RESOLUTION

NOW THEREFORE, it is hereby found, determined and resolved by the Planning Commission of the City of Highland as follows:

1. The Planning Commission finds that all of the facts set forth in the Recitals, Part "A" of this Resolution, are true and correct.

2. The City of Highland Planning Commission after due consideration, inspection, investigation and study made by itself and on its behalf, and after due consideration of all evidence and reports offered at said hearing, including the staff report to the Planning Commission dated December 21, 2021, and which is incorporated herein by this reference, does find and determine the following facts:

a. All necessary public meetings and opportunities for public testimony and comment have been conducted in compliance with State Law and the Municipal Code of the City of Highland.

4. A duly noticed public hearing was held by the Planning Commission on December 21, 2021, in the City Hall Council Chambers and notice of the time, date, place and purpose of the aforesaid hearing was given as required by applicable law. At the public hearing, the Planning Commission took testimony, both written and oral, from various parties, including the Applicant.

5. Pursuant to the California Environmental Quality Act (CEQA) Guidelines, an Initial Study was prepared for the project. It was determined that Mitigation Measures were necessary to address potential impacts. A Notice of Intent to adopt a Mitigated Negative Declaration (MND) was circulated and Mitigation Monitoring and Reporting Program prepared for consideration by the Commission.

6. Findings of Fact for Variance VAR-21-001:

a. That a strict or literal interpretation and enforcement of the specified regulation would result in practical difficulty or unnecessary hardship not otherwise shared by others within the surrounding area or vicinity.

Response: The regulation for which a variance is being requested is, Highland Municipal Code, Title 16, *Land Use and Development,* Table 16.24.040.A *Industrial Site Development Minimum Standards, No. 8. Maximum building height (in feet) – 35'.* The Business Park Zone permits general warehousing. Warehousing built to industry standard requires 36' clear height to accommodate joists, lights and sprinkler systems with 4-5 feet to reach the roof of the structure followed by an additional 4-5 feet above the roofline to screen roof-mounted equipment such as HVAC. Limiting the building height to 35' makes the use infeasible.

b. That there are exceptional or extraordinary circumstances or conditions applicable to the property involved or to the intended use of the property which do not apply generally to other properties in the vicinity and under the same zoning classification.

Response: The property involved is zoned Business Park which is the limiting condition in this application. Industrially Zoned property to the southwest also permits warehousing, but allows a maximum building height of 50'.

c. That the struct interpretation and enforcement of the specified regulation would deprive the applicant of privileges enjoyed by the owners of other properties in the vicinity and under the same zoning classification.

Response: The Applicant would be deprived of constructing a fully-functional warehouse on the site which is zoned Business Park and allows warehousing and distribution.

d. That the granting of the variance will not constitute a grant of special privilege inconsistent with the limitations on other properties in the vicinity and under the same zoning classification.

Response: The granting of the variance is permitted by the Municipal Code, Section 16.08.070 *Variances*. The Community Development Director has the authority to grant a Minor Variance including, 16.08.070.C.7 "*Up to 30 percent of height limitations, except that any height deviation not exceed two feet shall also be considered a minor variance.*" Thus the Director could authorize a maximum building height of 45.5 feet, however, because the related project entitlements require Planning Commission approval, the Variance too must be considered by the Commission with respect to the totality of the project. There is no granting of a special privilege as height variances are explicitly listed.

e. That a granting of the variance will not be detrimental to the public health, safety or welfare, or materially injurious to properties or improvements in the vicinity; and

Response: The granting of a variance for an additional 10' of building height will increase the massing of the building. The site design brings the building all the way to the front of the site on 6th Street with extensive building setbacks of 73' from Cypress Street and Grape Street and 195' from the rear property line, adjacent to existing residential uses. Noise, sound, vibration, lighting and traffic issues were all analyzed in the project's Initial Study. Mitigation Measures were established as appropriate to respond to any negative impact to properties and improvements in the area. The Mitigation Measures will be adopted with the project's Conditions of Approval.

f. That the granting of the variance is consistent with the objectives and policies of the general plan and the intent of this title.

Response: The granting of the variance will allow the project to be developed in compliance with City and industry standards for warehousing and distribution. This use is in compliance with the General

Plan and Zoning designations of Business Park. The project's design is in compliance with other development standards in Title 16 as well as General Plan Policies included in the Land Use Element and Community Design Element especially for the Victoria Avenue Corridor and its transition from aging residential stock to uses complimentary to the San Bernardino International Airport and gateway from the 210 Freeway.

7. Based on the Findings and Conclusions set forth above, the Planning Commission approves Variance VAR-21-001 to allow a maximum building height for this project of 45' in the Business Park Zone. The variance is related to the development of a 305,617 square foot warehouse subject to Conditional Use Permit CUP-21-007, Design Review DRA-21-005, and Tentative Parcel Map 20384/TPM-21-002 and their Conditions of Approval.

PASSED, APPROVED AND ADOPTED this 21st day of December, 2021.

_____
Randall Hamerly, Chairman

ATTEST:

_____
Lawrence A. Mainez
Community Development Director

Attachment 4

Resolution No. 2021 - ___

Approving Design Review Application DRA-021-005

PC RESOLUTION NO. 2021 – ____

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF HIGHLAND, CALIFORNIA, APPROVING DESIGN REVIEW APPLICATION DRA-21-005 INCLUDING SITE PLAN, BUILDING ELEVATIONS, ROUGH GRADING PLAN AND CONCEPTUAL LANDSCAPE PLAN FOR THE DEVELOPMENT OF A 305,617 SQUARE FOOT WAREHOUSE AT THE NORTHWEST CORNER OF 6TH STREET AND VICTORIA AVENUE. RELATED ENTITLEMENTS INCLUDE CONDITIONAL USE PERMIT CUP-21-007, VARIANCE VAR-21-001 AND TENTATIVE PARCEL MAP 20384/TPM-21-002.
ASSESSOR'S PARCEL NUMBERS 1192-281-09 THROUGH 14.

APPLICANT: PATRIOT USICV VICTORIA, LLC (PATRIOT PARTNERS)

A. RECITALS

1. On June 16, 2021, the Applicant filed an application for Design Review DRA-21-005 to develop a 305,617 square foot industrial warehouse and associated improvements including loading docks, tractor-trailer stalls, passenger vehicle parking spaces, a stormwater detention/infiltration basin, and landscape area. The Application includes a Site Plan, Building Elevations, Rough Grading Plan, and Conceptual Landscape Plan; Related entitlements also applied for include Conditional Use Permit CUP-21-007, Variance VAR-21-001 to increase the maximum building height permitted to 45'; and Tentative Parcel Map 20384/TPM-21-002 to merge six (6) parcels into one (1);

2. The site is located on an approximately 12.29 acres at the northwest corner of 6th Street and Victoria Avenue within the City's Business Park Zoning and General Plan Designations;

3. Pursuant to the provision of the California Environmental Quality Act (CEQA) and State and Local CEQA Guidelines, the City of Highland is the Lead Agency, and is charged with the responsibility of deciding whether or not to approve the proposed Project. An Initial Study and Mitigated Negative Declaration were prepared and circulated in accordance with state and local law and will be considered by the Planning Commission at the December 21, 2021, public hearing;

4. On December 21, 2021, the Planning Commission of the City of Highland conducted a Public Hearing at the City Hall Council Chambers in Highland, California, at 6:00 p.m.

5. All legal prerequisites to the adoption of this Resolution have occurred.

B. RESOLUTION

NOW THEREFORE, it is hereby found, determined and resolved by the Planning Commission of the City of Highland as follows:

Section 1. The Planning Commission finds that all of the facts set forth in the Recitals, Part "A" of this Resolution, are true and correct.

Section 2. Pursuant the California Code of Regulations, the City of Highland Planning Commission hereby finds that a Mitigated Negative Declaration prepared for the project has been completed in compliance with the California Environmental Quality Act (CEQA) and that the Planning Commission has reviewed and considered the information contained in the staff report, and the comments received during the public review process, prior to approving the project.

Section 3. Based upon substantial evidence presented to the Planning Commission during the December 21, 2021 Public Hearing, including public testimony and written and oral Staff Reports, the Planning Commission finds as follows:

a. All necessary public meetings and opportunities for public testimony and comment have been conducted in compliance with State Law and the Municipal Code of the City of Highland.

Section 4. Findings of Fact (Design Review)

a. That the proposed project is consistent with the general plan or specific plan.

Response: The General Plan designation for the site is Business Park, which allows for a "variety of light industrial, research and development and office uses that provide peasant and attractive working environments." "Appropriate uses include light manufacturing, wholesaling and warehousing conducted within an enclosed building." (Chapter 2 Land Use Element) The proposal for a 305,617 square foot warehouse is wholly within the description of permissible uses.

Additionally, the General Plan goals and policies relevant to the project include its inclusion in the Victoria Avenue Corridor Policy Area, Circulation Element, and Community Design Element. The project meets all relevant goals and policies.

b. That the proposed use is in accordance with the objectives of Title 16, Land Use and Development of the City of Highland Municipal Code, and the purposes of the land use district in which the site is located.

Response: The project would be developed in compliance with the Highland Municipal Code standards related to warehousing in the Business Park District. Per Municipal Code Section 16.24.040 Employment District Development Standards, the maximum lot coverage is 60%. The project calls for 57.1%. It meets the minimum lot size, lot width and depth as well as required building setbacks and landscape coverage. Additionally, it meets general development standards related to circulation, parking, and lighting.

c. That the proposed use is in compliance with city design and landscape standards and criteria.

Response: The Highland General Plan describes specific criteria related to this location in the Land Use and the Community Design Elements. Goal 10.2 seeks to create attractive and visually unified major arterial corridor with specialized streetscape and landscape improvements. Goal 10.8 seeks to ensure that development is professional and attractive in appearance through coordinate site planning, signage and architectural design. The project will be responsible to construct right-of-way improvements around its perimeter including Victoria Avenue and contribute to the future 12' landscaped median. As conditioned by the City's Landscape Architect, the project must exhibit specialized landscaping at entrances. The corner signage/public art identifies the entrance to Highland and this significant intersection. It enhances the contemporary architecture of the building and sets the tone for surrounding development in Highland.

The design meets the intent of Policy 10.8.1 which encourages "contemporary, clean and distinctive buildings with clearly visible entrances" and Policy 10.8.3 to "avoid long, blank building walls by incorporating vertical and/or horizontal façade articulation and modulation and varying use of color, materials and landscaping." It consolidates smaller lots into larger parcels to create a larger, more functional use. Parking and service areas are screened from public view with walls and landscaping and berms and utilities will be underground. The building is set back as far as possible from adjacent residential uses.

d. That the proposed use, together with the conditions applicable thereto, will not be detrimental to the public health, safety, or welfare or will not be materially injurious to properties or improvements in the vicinity of the site.

Response: The warehouse development will be in compliance with Municipal, Fire & Building codes. Each public safety division of the City has reviewed the project and provided relevant Conditions of Approval that will be adopted by resolution. The necessary ingress and egress are provided and all public utilities and services will be in place. There is no indication that the project would be detrimental to the public health, safety or welfare, or materially injurious to properties and improvement in the vicinity.

Section 5. Based on the Findings and Conclusions set forth above, the Planning Commission approves Design Review Application DRA-21-005. All improvements will be completed subject to the Conditions of Approval attached hereto and incorporated by reference.

C. ADOPTION OF RESOLUTION.

The City Clerk shall certify to the adoption of this Resolution and shall cause the same to be published or posted in the manner prescribed by law.

PASSED, APPROVED AND ADOPTED this 21st day of December, 2021.

ATTEST:

Randall Hamerly, Chairman
Planning Commission

Lawrence A. Mainez
Community Development Director

CITY OF HIGHLAND
PLANNING DIVISION CONDITIONS OF APPROVAL

Date:	December 21, 2021
Applicant:	Patriot USICV Victoria, LLC (Patriot Partners)
File/Index:	**Design Review Application DRA-21-005**
Proposal:	Design Review of a 305,617 square foot warehouse / logistics and related facilities. DRA includes a Site Plan, Building Elevations, Rough Grading Plan and Conceptual Landscape Plan.
Location:	A 12.29 acre site at the NWC of Victoria Avenue and 6th Street. APNs: 1192-281-09 through 14
Related Entitlements:	CUP-21-007, VAR-21-001, TPM-21-002

PLANNING CONDITIONS OF APPROVAL

Note: These conditions represent Planning Division conditions only and are meant to be only one part of the Project's overall conditions that may include Building and Safety, Engineering, and the Fire Department conditions of approval. All required on-site and off-site improvements shall be completed and approved prior to final inspection for occupancy, except where noted.

This Design Review Application is conditionally approved, subject to compliance with the requirements as specified below. The Conditions listed below are continuing Conditions; failure of the Applicant and/or operator to comply with any or all Conditions at any time, shall result in initiating revocation of the subject permit.

1. Design Review Application (DRA-21-005) shall become null and void:

    a. Unless all conditions have been complied with and the occupancy or use of the land or structures authorized by this design review application, and have occurred within thirty-six (36) months from the approval date this design review application shall expire and be null and void without further action by the City of Highland.

    b. Where circumstances beyond the control of the Applicant cause delays which do not permit compliance within the time limitation established in this Section, the Planning Commission may grant an extension of time for a period of time not to exceed an additional thirty-six (36) months. An application for an extension of time must be set forth in writing, stating the reasons for the extension, and must be filed with the community development department no less than 30 calendar days nor more than 90 calendar days prior to the expiration date of the permit or approval. Such application shall be filed together with the City's processing fee, as established by the City Council.

NOTE: All required on-site and off-site improvements shall be completed and approved prior to final inspection for occupancy.

2. The proposed Design Review entitlement includes approval of a Site Plan, Building Elevations, Rough Grading Plan and Conceptual Landscape Plan for the construction and operation of an approximate 305,617 square foot warehouse / logistics and associated improvements including loading docks, tractor-trailer stalls, passenger vehicle parking, a stormwater detention/infiltration basin, landscaping and off-site improvements as illustrated in project plans.

    a. The approved site plan, building elevations, rough grading plan, conceptual landscape plan, color and material samples are on file with the Planning Division and included herein by reference.

    b. Three complete sets of plans reflecting these conditions of approval and any Planning Commission directives shall be submitted to the planning Department within two weeks of this project's approval.

3. The operator and recorded owner of the property shall submit to the Planning Division written evidence of agreement with all conditions of this approval before the approval becomes effective. Plan check cannot begin prior to receipt of this signed documentation.

4. In compliance with the Highland Municipal Code, the Applicant/Owner shall agree, at his/her sole cost and expense, to defend, indemnify, and hold harmless, the City, its officers, employees, agents, and consultants, from any claim, action, or proceeding brought by a third-party against the City, its officers, agents, and employees, which seeks to attack, set aside, challenge, void, or annul an approval of the City Council, Planning Commission, or other decision-making body, including staff, concerning this project. The City may, at its sole discretion, participate at its own expense in the defense of any such action but such participation shall not relieve the Applicant/Owner of his/her obligations under this condition.

5. The Owner/Applicant is responsible for implementing all conditions of approval to the satisfaction of the Community Development Director, City Engineer, Fire Department, and Police Department. No final inspection or clearances shall be given until all conditions are met. Each condition of approval is separately enforced, and if one of the conditions of approval is found to be invalid by a court of law, all the other conditions shall remain valid and enforceable.

6. Revisions, modification, or deletions of associated plans must be submitted to the Planning Division for review and approval. Revisions may require additional review by the Planning Commission.

7. Pursuant to provisions of California Public Resources Code Section 21089 (b), this Application shall not be operative, vested or final, nor will building permits be issued or a map recorded, until: (1) the Notice of Determination (NOD) regarding the associated environmental action is filed and posted with the Clerk of the Board of Supervisors of the County of San Bernardino, and; (2) any and all required filing fees assessed pursuant to California Fish and Game Code Section 711.4, together with any required handling charges, are paid to the Clerk of the Board of Supervisors of the County of San Bernardino.

    a. The Applicant shall provide the Planning Division with a check for the appropriate fee, made payable to the Clerk of the Board of Supervisors, no later than 24 hours after receiving approval of the project. The City will file the NOD and fee payment with the County/State and will provide the Applicant with a copy of the receipt and filed NOD.

8. Development Impact Fees shall be paid in accordance with City policy.

9. A copy of the utility plan shall be submitted with or prior to the submittal of a grading plan to the Community Development Director and City Engineer for review and approval. The utility plan shall show the location of all proposed above ground electrical transformers, utility cabinets, back flow devices, detector check valves, etc. both on site and in the public right-of-way.

10. Prior to issuance of a certificate of occupancy by the City, all on and off-site landscaping, irrigation or other improvements shown on the approved landscaping and irrigation plans, including any walls and fences, shall be installed.

11. The project site has been reviewed and approved for warehouse use. Any change of use of this project site, the occupancy, or tenant change in the building, or portion thereof, may require a revised plot plan be submitted to the City for review and approval, which identifies location of use, letter of intent and parking requirements. Outdoor storage of materials is prohibited.

12. All permanent parking areas shall be paved and permanently maintained with asphalt or concrete and designated with clearly painted lines. The number of parking spaces, including disabled parking, shall comply with the approved Site Plan.

13. The Applicant / Developer shall install a bicycle rack on-site near the building. The bike racks shall be located in areas where they will not impede the flow of pedestrian traffic.

14. All ground mounted, as well as wall mounted mechanical, electrical, or gas equipment shall be screened from public view by the use of landscaping and/or architectural treatments compatible with the adjoining building's architectural design.

15. All rooftop mounted mechanical equipment, with the exception of solar panels, shall be screened from public view. This can be accomplished by architectural treatments of parapets equal in height to the tallest piece of roof-mounted equipment, but not to exceed an overall height of 45 feet.

16. A revised photometric plan shall be provided to the Planning Department for review and approval prior to issuance of a grading plan in compliance with Municipal Code Sections 16.40.160 *Lighting* and 16.48.080 *Light and glare*.

    a) The amount of illumination projected onto a residentially zoned property or use should not exceed 0.1 foot-candle at the property line. Illumination should not exceed 0.5 foot-candles measured at the property line adjacent to non-residential properties.

    b) Lights shall be shielded and directed away from surrounding properties and right-of-way.

    c) Parking lot light standards shall not exceed twenty-five feet (25') in height measured from grade.

    d) Parking lot light standards shall be located at a distance from parking lot trees, so the trees do not interfere with the lighting pattern or the light fixture. Lighting standards shall be shown on the landscape plans and appropriately positions so as not to displace the intended location of trees in parking lot planters.

17. If the warehouse is ever split between two or more users, a reciprocal access agreement shall be recorded to permit shared cross property access for vehicle circulation between Victoria Avenue and Grape Street.

18. The Developer shall comply with all applicable Conditions of Approval and the Mitigation Monitoring and Reporting Plan related to the associated entitlements; CUP-21-007, TPM-21-002.

Landscaping

19. Provide trees, shrubs and groundcover at all landscape areas as indicated on the architectural site plan. This includes the northern perimeter landscape located within the gated truck loading/ unloading areas, shown as landscape area on the architectural site plan but where the conceptual landscape plan reflects no improvements.

20. Applicant's Landscape Architect shall work with Staff and City Landscape Architect to update tree layout to better accentuate and complement the

building's unique architectural glazing arrangement near the various office entrances.

21. Provide concrete headers where frontage landscape meets adjacent offsite parcels to protect the integrity of the proposed planting, and to define the limits of maintenance responsibility.

22. Coordinate the landscape plan layout with the project's Water Quality Management Plan to ensure that the landscape layout aligns with the required Best Management Practices (BMP) facilities.

City of Highland

Engineering Department
Conditions of Approval
(CUP 21-007 & DRA 21-005 & TPM 20384) Patriot NWC of 6th Street and Victoria Avenue

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A - Required Prior to Map Approval
B - Required Prior to Building Permit/Construction
C - Required Prior to Building Occupancy
D - Ongoing
E - Required Prior to Grading Permit
* - Non Standard Conditions

Soils/ Geology/ Grading

E 1. Design grading and landscaping plans to comply with the City's clear sight triangle criteria at public street intersections and at private driveways. Walls, fencing, monument signs, slope, and landscaping, within the clear sight triangle, must not exceed thirty inches in height measured from the flowline of the street, unless a sight distance analysis that demonstrates sight distance is adequately maintained is submitted to and approved by the City Engineer.

B 2. Submit a preliminary soils report, prepared by a licensed Geotechnical Engineer, for review and approval by the City Engineer. Comply with the recommendations contained in the report and any amendments thereof as approved by the City Engineer.

E 3. Submit rough and/or precise grading plans to the City Engineer for review and approval. Comply with the City of Highland grading standards as shown on the grading plan checklist.

B 4. Submit the structural design and location for any required retaining walls for review and approval by the City Engineer. Construct concrete v-ditches and drainage system at the back of retaining walls in accordance with the Grading Plan Checklist and as required by the City Engineer.

E 5. Submit an erosion control plan to minimize potential increases in erosion and sediment transport during construction activity for City Engineer approval. Place erosion control measures during or after grading work as required by the City Engineer.

E 6. Design short-term erosion control in accordance with Best Management Practices such as, hydroseeding, mulching, jute matting or plastic sheeting to protect slopes; silt fencing to control site perimeter; and straw bale barriers, sand bag barriers, rock filters or sediment basins to control internal erosion, or other methods to stabilize disturbed areas, as approved by the City Engineer.

D 7. Implement dust control measures during construction activities including, but not limited to, daily watering of construction area as frequently as necessary during active and inactive periods, utilizing soil emulsions, limiting construction vehicle speed to 10 miles per hour, stabilizing construction entrances to prevent trackout of sediments, and street sweeping.

E 8. Design grading to intercept and conduct off-site tributary drainage flow around or through the project site in a manner that does not adversely affect adjacent properties. Conveyance of on-site and off-site tributary flows shall be maintained by the underlying property owner.

E 9. Design grading to drain the entire area of the project to the proposed Water Quality Management Plan (WQMP) infiltration basins and to accommodate overflows as necessary.

E* 10. Plot all existing and proposed easements on grading plan and note disposition of any existing utilities, appurtenances, fences, and access roads.

D* 11. Construct temporary sedimentation basins for use during the grading and construction period of the project. Do not start using the proposed infiltration basins until the site is stabilized for erosion and sedimentation.

B 12. Submit original wet signed and stamped rough grading certifications from the soils engineer and the grading engineer, along with compaction reports, to the City Engineer.

C 13. Submit original wet signed and stamped final grading certification from the grading engineer, to the City Engineer.

STREET IMPROVEMENT

E* 14. Remove existing overside drain, earthen drainage ditch, curb and gutter along westsdie of Victoria Avenue and construct new street improvements across the entire Victoria Avenue frontage of the project. Construct new street improvements including, but not limited to, 6" curb and gutter located 40' west of street centerline, 6'-wide curb-adjacent sidewalk, commercial drive approaches at locations determined in final engineering, and street lights. Design the limits and extent of removal of existing improvements, and construction of transitional improvements, as directed by the City Engineer.

E* 15. Construct new asphalt concrete pavement with class II aggregate base improvements to centerline of Victoria Avenue (T.I.=9) asphalt concrete pavement with class II aggregate base. Construct a 4" mill and fill for the northbound #1 on Victoria Avenue. Design the limits and extent of removal of existing improvements, and construction of transitional improvements, as directed by the City Engineer.

E* 16. Remove existing improvements along northside of 6th Street and construct new street improvements across the entire 6th Street frontage of the project. Construct new street improvements including, but not limited to, 6" curb and gutter located 22' north of street centerline, 6'-wide curb-adjacent sidewalk, and street lights. Design the limits and extent of removal of existing improvements, and construction of transitional improvements, as directed by the City Engineer.

E* 17. Construct new asphalt concrete pavement with class II aggregate base improvements to centerline of 6th Street (T.I.=8) asphalt concrete pavement with class II aggregate base. Design the limits and extent of removal of existing improvements, and construction of transitional improvements, as directed by the City Engineer. Eastbound 6th Street, south of centerline, will be rehabilitated by others at the end of EVWD's SNRC project.

E* 18. Remove existing improvements along eastside of Grape Street and construct new street improvements across the entire Grape Street frontage of the project. Construct new street improvements including, but not limited to, 6" curb and gutter located 26' east of street centerline, 6'-wide curb-adjacent sidewalk, and street lights. Design the limits and extent of removal of existing improvements, and construction of transitional improvements, as directed by the City Engineer.

E* 19. Construct new asphalt concrete pavement with class II aggregate base improvements to 12' west of centerline of Grape Street (T.I.=8) asphalt concrete pavement with class II aggregate base. Design the limits and extent of removal of existing improvements, and construction of transitional improvements, as directed by the City Engineer.

C* 20. Construct commercial drive approaches with curb returns per City Standard 213. Note 4.5' sidewalk easement will be required back of commercial drive approach (Std. 213).

C 21. Construct private ingress/ egress improvements at the northerly of Grape Street driveway to permit right in and left out only truck movement.

E 22. Submit engineering plans for street improvements and signing & striping to the City Engineer for review and approval. Indicate the location of any existing utility/facility which would affect construction on plans and profiles. Comply with the City design standards as shown on the street and storm drain improvement checklist. Provide ADA access to site from right of way.

C 23. Install traffic control signs and pavement markings, with locations and types approved by the City Engineer. Modify Victoria Avenue striping to provide northbound left turn pocket at the northerly truck entrance, per City Standards.

B 24. Design and construct public improvements including sidewalk, driveway approaches and access ramps in accordance with all requirements of the State of California Accessibility Standards, Title 24 California Administrative Code. Redesign and reconstruct existing frontage improvements if found not in compliance with City Standards.

C* 25. Install new LS3 metered street light system along the project frontages. The new street lights, electrical conduits, wiring and meter etc. will be owned and maintained by the City. The street lights shall be equipped with a Light Emitting Diode (LED) luminaire on a marbelite pole with types and at the location specified by the City Engineer. Pay the City street lighting energy and maintenance charges for the initial 12 months.

C 26. Submit "Record Revisions" to all plans to reflect the improvements as constructed, and any changes made during construction.

WATER QUALITY/ DRAINAGE

E 27. Obtain approval by the City Engineer of a Final Water Quality Management Plan (F-WQMP), prepared in accordance with the City's National Pollutant Discharge Elimination System (NPDES) permit requirements in effect at the time the Conceptual Water Quality Management Plan was approved unless subsequent City NPDES permits require otherwise. The F-WQMP shall (1) be prepared, signed, and sealed by a licensed Civil Engineer, (2) include Site Design Low Impact Development and Source Control Best Management Practices (BMPs) appropriate for residential development, (3) include a BMP implementation, operation, and funding mechanism, and (4) be certified by the property owner. The property owner shall also enter into a Stormwater BMP Transfer, Access, and Maintenance Agreement with the City on standard City form. Include a copy of the

recorded agreement in the F-WQMP. Construct BMPs in accordance with the approved F-WQMP.

C* 28. Construct and implement site design BMPs specified in the project approved F-WQMP including, but not limited to, pretreatment devices approved at time of C-WQMP approval, underground infiltration systems, and raised curb landscaped areas and parking lot islands. Alternate site design BMPs which are equally effective may be submitted for review and approval by the City Engineer.

E 29. Include the project grading plan, landscape plan and utility plan with the first submittal of the F-WQMP.

C 30. Submit two sets of WQMP BMP Exhibits with a "WQMP BMP As-Built Certificate" wet signed and sealed by the Engineer of Record. The Certificate shall state:

"I hereby certify that the Water Quality Management Plan Best Management Practices have been constructed under my supervision in accordance with the approved plans and are functional to the best of my knowledge."

C* 31. Construct on-site private drainage system, HDPE or other pipe material as approved by City Engineer, to drain the entire project site to the proposed WQMP BMPs in accordance with the approved Final Water Quality Management Plan, and construct necessary drainage overflow facilities. Construct an overflow pipe to convey any overflow from the proposed underground infiltration system to 6th Street as necessary.

B 32. At the underground infiltration system proposed by the Final WQMP, conduct at least two new infiltration tests using a double-ring infiltrometer. The tests shall be conducted at the proposed chamber system subgrade elevation, prior to the submittal of the F-WQMP. After obtaining the results from the two tests, the engineer and geotechnical engineer shall determine if additional testing is required.

C 33. Register the underground chambers with EPA as a Class V Injection Well.

E 34. Submit a hydrology study to determine storm runoff quantities tributary to and generated by the Project for review and approval by the City Engineer. Include hydraulic calculations to determine the size and type of all drainage facilities.

E 35. Submit engineering plans for public and private drainage systems to the City Engineer for review and approval. Indicate the location of any existing utility facility which would affect construction on plans and profiles. Comply with the City design standards as shown the street and storm drain improvement checklist.

E 36. Construct Victoria Avenue catch basin at existing sump and location of overside drain. Construct public storm drain outlet from new catch basin to convey captured flows from the westside of Victoria Avenue into the existing culvert at the west side of the 6th Street and Victoria Avenue intersection. Construct storm drain stub out from this storm drain to connect to future drainage improvements planned and designed to be constructed at the ultimate configuration of the 6th Street and Victoria Avenue intersection as directed by the City Engineer.

DEDICATION/ANNEXATION

C* 38. Apply to the City to annex the project into the City's Consolidated Landscape District (LMD) for potential City maintenance of parkway and frontage landscaping along 6th Street and Victoria Avenue. The City will maintain parkway and frontage landscaping utilizing LMD revenue only if the City determines that adequate maintenance is not being provided by the property owner. The potential future amount of assessment will include the estimated on-going maintenance cost and one-time construction cost to convert the privately-maintained system to the City-maintained system.

C* 39. Apply to the City to annex the project into the City's Landscape Maintenance District (LMD) for maintenance of future median landscaping along Victoria Avenue median. Sign the ballots prepared by the City agreeing to the annexation, and the potential future amount of assessment. Assessment for Victoria Avenue median landscaping will commence the year Victoria Avenue median is constructed by the City or other future developments. Landscaping within the median shall be maintained by the City.

B* 40. Dedicate an irrevocable offer of dedication, (1) a 10-foot wide minimum landscape easement across the Victoria Avenue and 6th Street frontage, in addition to the required street right-of-way, as approved by the City Engineer, (2) a temporary construction easement granting permission for the City to enter the property to construct and restore landscaping. The exact dimensions of the landscape easement will be determined at the time on-site improvement plans have been prepared.

E* 41. If the site is ever subdivided in the future, the Project will be required to grant a reciprocal private easement in favor of the parcels created for vehicular access, including emergency access.

A* 42. If the site is ever subdivided in the future, record a reciprocal private easement for drainage, and utilities.

B 43. Record a Final Map with the San Bernardino County Recorder pursuant to the provisions of the State Subdivision Map Act. Submit a duplicate photo mylar of the map recorded with the San Bernardino County Recorder.

A 44. At the time of Final Map submittal, include traverse calculation sheets which show error of closure, copies of recorded maps and deeds used as reference and/or showing original land division, tie notes and bench marks referenced, and a current title report. Inverse calculations will not be accepted for plan check.

A 45. Include an Improvement Certificate/Statement on the Parcel Map in accordance with Section 66411.1 of the Subdivision Map Act.

FEES/PERMITS

C* 46. Pay an in lieu fee for the design and construction of the future raised landscape median along the project frontage of Victoria Avenue, as determined by the City Engineer.

C* 47. Pay an in lieu fee for the design and construction of the future traffic signal at 6th Street and Victoria Avenue, as determined by the City Engineer.

C* 48. Pay City processing fee for application of Development Impact Fee (DIF) credits for street, drainage, and median improvements pursuant to adopted City Council DIF Credit Policy.

D 49. Pay appropriate Engineering fees for district annexation, plan check, WQMP review, traffic report review, hydrology study review, structural calculation review, on-site and off-site inspection, utility excavation permits, GIS map plan update, microfilming and storage of maps and plans, and other required fees.

D 50. Obtain a permit from Engineering prior to any on-site construction or construction within the public right-of-way and obtain permit from Caltrans prior to any construction within or impacting Caltrans Access Control areas.

E 51. Post a deposit for erosion control which shall not be released prior to completion of all on-site construction.

A 52. Post a deposit for monumentation based on an estimate of the cost to perform the work by the project surveyor or engineer. The deposit shall not be released prior to written verification from the surveyor or engineer that the monuments have been set and payment for the work has been received.

UTILITIES/ CONSTRUCTION

E 53. Obtain written permission from the adjoining property owners for offsite grading and/or construction, if any.

B 54. Install construction fencing and screening in accordance with Building and Safety Division Policy 335.

C 55. Reconstruct existing public improvements removed or damaged during construction. Pavement repair, which may include A.C. overlay, T-cut trench repair and/or slurry seal after removal of existing striping shall be across all or a portion of damaged pavement caused by this project as determined by the City Engineer.

C 56. Coordinate, and where necessary, pay for the relocation of any existing public utilities as necessary.

C 57. Provide all utility services to each building, including sanitary sewers, water, electric power, gas, cable TV, internet, and telephone. All utilities listed under Highland Municipal Code Section 16.40.380 (A) are to be underground per Ordinance 315.

E 58. Comply with applicable requirements of the National Pollutant Discharge Elimination System (NPDES) permit program. Provide written verification from the Regional Water Quality Control Board specifying the projects WDID number.

B 59. Destroy any abandoned wells on the property or similar structures that might result in contamination of underground waters in a manner approved by the City Engineer.

B 60. All underground structures, except those desired to be retained, must be broken in, backfilled, and inspected before covering.

D 61. Comply with the prevailing City design and construction standards and requirements at the time of permit issuance.

B 62. Design and construct a trash enclosure per City Standard 700.

C 63. Install telephone, cable television, and internet enclosures underground whenever the underground installation is an available option offered by the utility companies. If the underground installation is not an available option and utility enclosures must be installed above ground, install the above-ground utility enclosures and any flush mount utility enclosures at locations where construction of retaining walls will not be necessary for compliance with the setback requirements of the utility companies.

B* 64. Submit a Composite Utility Plan indicating the location of all above ground and flush mount water, electric, cable TV, internet, and telephone utility structures prior to City issuance of utility permits.

B 65. Underground existing overhead utilities along Victoria Avenue and Grape Street frontages per Ordinance 434.

Building and Safety Division Conditions of Approval

Date:	July 5, 2021
Project:	307,429 sq/ft warehouse building – NWC of 6th st and Victoria Ave.
Applicant:	Bridget Herdman
Site Location:	North West Corner of 6th Street and Victoria Ave.
Project Numbers:	**CUP:** 21-007, **DRA:** 21-005, **TPM:** 21-002
APN:	1192-281-09, 1192-281-10, 1192-281-11, 1192-281-12, 1192-281-13, 1191-281-14

1. Please provide the following number of construction plans and documents listed below for the first review of the proposed project. The initial plan review time will take two weeks on most projects. The applicant will receive an application number at the time plans are submitted for Building & Safety's plan review. This number is needed to obtain information regarding your project.

    (3) Architectural Plans
    (3) Structural Plans
    (2) Structural Calculations
    (3) Plot/Site Plans
    (3) Electrical Plans
    (3) Electrical Load Calculations
    (3) Exiting Plans
    (3) Plumbing Plans/Isometrics
    (3) Mechanical Plans
    (3) HVAC Duct Layout Plans
    (2) Roof and Floor Truss Plans
    (2) Title 24 Energy Calculations
    (2) Geology Report
    (2) Soils Report
    (3) Precise Grading Plans (For Reference)
    (3) Site Disabled Access Plan
    (3) Condition of Approval Packages (Include within Plan Sets)
    (3) Temporary Fence Plan
    (1) Approved Health Department Plans
    (2) Energy Commissioning Plan

2. All structures shall be designed in accordance with the current version of the California Building Codes, including the California Green Building Standards Code. Design all structures to comply with Seismic Design Category D, basic wind speed 96 MPH, at exposure "C", and Energy Climate Zone 10.

3. All onsite utilities are to be underground. As approved by the Planning Division, utility cabinets and transformers are exempt.

4. Construction projects requiring fire permits must apply and submit fire plans prior to the issuance of the building permit, including fire sprinkler submittals.

5. Building and Safety does not release all meters until final approvals are obtained from all agencies and departments. Policy 295.

6. It has come to the City's attention that premature failures have occurred in copper piping when used within the City of Highland, particularly east of City Creek. Property Owners, Contractors and Developers are advised to analyze soil and water compositions when considering the type of pipe material to be utilized. City staff makes no recommendations on which Plumbing Code approved products or methods to be utilize, this is the responsibility of the property owner or contractor. Alternate unapproved code materials may be submitted for City approval at the time of plan submittal via an alternate material and methods application.

7. The Developer/Owner is responsible for the coordination of releasing any Deferral of Development Impact Fees or Bonds after such fees have been paid. The Developer/Owner should be aware, once the deferral notice is sent to the San Bernardino County Recorder's Office; the release process takes two to three weeks. This process will delay final Certificates of Occupancy.

8. The Developer/Owner is responsible for the coordination of the final occupancy. The Developer/Owner shall request clearances from each department and/or agency at least two weeks prior to requesting a final building inspection from Building and Safety. Each agency shall sign the back of the Building and Safety Job Card, or provide agency approved signed documentation, and provide a copy of the signatures to Building and Safety at the time the final inspection is requested.

9. Building and Safety inspection requests must be made by 4:00 pm. on the previous City working day to receive a next business day inspection. Please contact (909) 864-2136, Ext 228.

10. A security fence with screening shall protect all construction sites. The fencing and screening shall be maintained at all times to protect pedestrians. All development projects shall submit a construction fencing plan with the construction design plans. Construction projects that have phased occupancy shall be completely separated by a construction fence that is screened and show the adjusted fence locations at each phase.

11. On site toilet facilities shall be provided for construction workers and such facilities shall be maintained in a sanitary condition. Construction toilet facilities of the non-

sewer type shall conform to ANSI ZA.3 and on site per NPDS stormwater requirements.

12. All construction materials, which are not used, shall be recycled pursuant to the requirements set forth by Ordinance No. 269. Receipts from the recycle company responsible for picking up the materials shall be kept in the construction office. After the construction is complete and before final occupancy, the trash receipts shall be forwarded to the City Public Services division.

13. Construction projects, requiring temporary electrical power, shall obtain an electrical permit from Building and Safety. No temporary electrical power will be granted to a project unless the following item is in place and approved by Building and Safety and the Planning Division.

    a) Installation of a construction trailer through the "Temporary Occupancy Permit", alternatively, a security fenced area where the electrical power will be located. Installation of construction/sales trailers must be located on private property. No trailers can be located in the street unless a permit from the Engineering Department is obtained.

14. Prior to the issuance of Building Permits, on site water service shall be installed and approved by the responsible agency. On site fire hydrants shall be approved by the Fire Department. No flammable materials will be allowed on the site until the fire hydrants are established and approved. No flammable construction materials shall be placed on the site without approvals by the Fire Department. All street and access roadways around the project shall be paved for emergency response vehicles before flammable materials are placed on the project.

15. Prior to issuance of building permits, site-grading certifications, compaction reports, and survey report shall be submitted to Building and Safety or to Public Works, as applicable.

16. Prior to issuance of building permits, provide a receipt from the appropriate Unified School District stating that all school fees have been paid.
    (San Bernardino Unified School Districts)

17. Prior to final inspection, provide Building & Safety with a flash disk of the approved plans and documents.

18. Final approvals from all applicable outside agencies and internal departments and divisions are required prior to Building and Safety permit final and occupancy approval.

19. All construction projects shall comply with the NPDES Stormwater Best Management Program. Prior to building permit issuance submit copy of the Water Quality Management Program Report. (WQMP)

20. All deferred plan items are to be identified on the plans cover sheet.

21. Final approvals from all applicable outside agencies and internal departments and divisions are required prior to Building and Safety permit final and occupancy approval.

22. Site development and grading shall be designed to provide access to all entrances and exterior ground floor exits and access to normal paths of travel. The accessible route(s) of travel shall be the most practical direct route.

23. All dead and removed trees and foliage is to be properly removed from the site.

24. The City enforces the State of California provisions of the California Building Code disabled access requirements. The Federal Americans with Disabilities Act (ADA) standards may differ in some cases from the California State requirements; therefore it is the building owner's responsibility to be aware of those differences and comply accordingly.

25. At the time of submittal for plan review, projects meeting the requirements under Section 5.410.2 and Section 5.410.2.3 of the California Green Building Standards Code shall submit a Commissioning Plan.

26. Prior to final inspection, provide Building & Safety with a flash disk of the final approved amended plans and documents.

Comments pertaining to the project/ preliminary drawing plans:

27. Demolition permits shall be obtained for all structures to be demolished (Parcels 1191-281-10, 1191-281-11, 1191-281-13, 1191-281-14)

28. The trash enclosure shall be accessible to persons with disabilities and located on an accessible route. The accessible route shall extend from the trash enclosure to the building it serves. Detail accessible route on plans. (CBC Section 11B-206.2.2)

City of Highland, **FIRE PREVENTION DIVISION,** Conditions of Approval.

DATE : September 27, 2021

APPLICANT : Bridget Herdman

ADDRESS : 1192-281-09, 1192-281-10, 1192-281-11, 1192-281-12, 1192-281-13, 1192-281-14.

SITE LOCATION: North of 6th Street between Victoria Avenue and Grape Street

FILE / INDEX No.: CUP 21-005 DRA 21-005 TPM 21-002

A tiered level of mitigation options has been developed and listed below are the systems and/or modifications required for your project. Compliance of the following items are a condition of **FINAL OCCUPANCY APPROVAL**. These conditions are required as acceptable solutions to the adverse fire conditions impacting firefighting and emergency operations accompanying the site/area. They will either assist in detection and extinguishment of the fire and/or facilitate the anticipated emergency operations.

This project is protected by the City of Highland Fire Department / Cal-Fire / California Department of Forestry and Fire Protection. Prior to any construction occurring on any parcel, the applicant shall contact the city of highland fire marshal office for verification of current fire protection development requirements. All new construction shall comply with the currently adopted California Fire Code and all applicable statutes, appendices, codes, ordinances, standards and policies of the City of Highland Fire Department/ Fire Prevention Division / Cal-Fire / California Department of Forestry and Fire Protection.

Fire Department Review of all projects is required.

ALL CONSTRUCTION (New and renovations to existing) SHALL COMPLY WITH THE CALIFORNIA FIRE CODE Along with amendments as adopted within the Highland Municipal Code (Ord. #411).

Note: All weather access roads (CFC) and fire hydrant/water system installations shall be in place, inspected and approved, **PRIOR** to combustible material being brought on site.

Note: The City of Highland has 2 areas within the '**FIRE SAFETY OVERLAY DISTRICT**' designated as **FR-1** and **FR-2**. Both areas may border or overlap areas identified by the State/CalFire as '**High Fire Severity Zone**' or '**Very High Fire Severity Zone**'. See **HMC** for construction requirements.

GENERAL.

1. **HF3:** A fuel break of one hundred (100) feet (brush and weed clearance) is required prior to construction. The clearance shall be maintained on a year-round basis. **CFC & HMC**

2. **HF31:** Approved fire hydrant pavement markers (blue dots) shall be installed at every hydrant.

3. **HF51:** The main electrical panel and all sub-panel(s) shall be labeled on inside cover for all circuits. **CEC**

4. **HF52:** Water heater (fuel fired), shall be properly vented to exterior of structure. Water heater shall be seismic strapped to wall and be located 18" above a garage floor. **CBC**

5. **HF55:** Commercial exit requirements:
   A. Required exit doors shall be maintained in an operable condition at all times
   B. Required exit doors shall swing outward and away in the direction of exit travel.
   C. Obstructions shall not be placed in the required width of an exit. Exits shall not be blocked or locked shut or obstructed in any manner during business hours.
   D. Exit paths shall be illuminated when structure is occupied.
   E. Exit path illumination shall be supplied from two (2) sources of power when occupant load is one hundred (100) persons or more.
   F. When exit way/exit pathway and/or exit doorway is not easily identified, additional exit signs shall be installed.

6. Exit signs shall be internally or externally illuminated by two lamps or shall be of the self-luminous type. **CFC; CBC**

7. **HF60:** Additional plans for access, fire safety systems, fire lanes and signage, gates, storage, or other special conditions may be requested for review, conditioning and approval by the fire marshal.

8. **HF56:** All flammable and combustible liquid storage and dispensing shall be in accordance with applicable sections of the **CFC, T-19** and city codes and ordinances.

9. **HF48:** A class "A" roof covering structure with "bird stops" shall be installed.

ACCESS:

10. **HF7:** Fire department **access** roads shall meet the fire dept. minimum unobstructed width of twenty (20) feet. (twenty-six (26) feet within FR-1&2 zones). **This standard shall not lessen other agency requirements.** Access roads shall be paved (asphalt/concrete) and in place **prior** to delivery of combustible building materials on site. Roads shall be designed and constructed to meet adopted city standards. **CFC**

11. **HF8:** All access roads, public, private streets and residential driveways shall maintain a minimum vertical clearance of thirteen (13) feet-six (6) inches. **CFC**

12. **HF10:** Driveways exceeding 150 feet shall have a fire department approved turn-around at the terminus. **CFC / APPENDIX D**

13. **HF11:** Fire department access roadway(s) and/or public/private street(s) exceeding one hundred fifty **(150)** feet in length shall provide an approved turn-around at the terminus (**cul-de-sac**). Minimum radius shall be **not less than forty (40)** feet. Or as approved by the fire marshal. Cul-de-sacs providing access to perimeter emergency access roads shall have a minimum radius of forty four **(44)** feet. **CFC / APPENDIX D, SBCO TRANSPORTATION STD**

14. **HF12:** Fire department access roadway(s); public/private street(s) and driveways shall not exceed 12% grade. **CBC / APPENDIX D, HMC**

15. **HF13:** Fire department access roadway(s); shall extend to within one hundred fifty (150) feet of and shall give reasonable access to all portions of the exterior walls of the first story of any building.
    An access road, approved by the fire dept., shall be provided to within fifty (50) feet of all structures when the natural grade between access road and structure is in excess of 30%.
    Where an approved access road cannot be provided, a fire protection system shall be required and approved by the fire department. **CFC**

16. **HF15:** "Phased" projects may be required to provide a minimum of two (2) remote points of approved access during construction. A secondary access, for fire and other emergency equipment and for routes of escape, which will safely handle evacuations. **CFC - APPENDIX D**

17. **HF19:** **Manually** operated gates across fire department access roadways, public and/or private streets and driveways, shall be equipped with approved emergency key-operated **"KNOX"** padlock or box containing key to open the private lock. For **automatic** gates, a "KNOX" emergency access switch, shall be installed, at location determined by fire department, and shall over-ride all command functions and open gate automatically upon activation. All automatic gates shall have a manual over-ride for use during loss of electric power. "KNOX BOX" request form

is available from the fire marshal or may be ordered directly from www.knoxbox.com (specify City of Highland, CA) **CFC – Appendix D Note: The city of Highland also requires an electronic "H" key system (Ord. #320) for multi-family, gated communities or secured storage facilities. HMC**

18. **HF24:** "NO PARKING – FIRE LANE" signs shall be posted at locations designated by fire marshal. Fire lane curbs shall be painted red, with white letters stating, "NO PARKING – FIRE LANE" on top, not face. **CFC - APPENDIX D**

19. **HF54:** Commercial and industrial structures-occupancies and gated complexes shall have a "**KNOX BOX**" system installed on the exterior of the building(s) or complex. location of device to be determined by the fire department. The box shall contain keys necessary to gain access and may contain pre-plans and MSDS information as required by the fire department. New and existing multi-tenant commercial buildings shall provide a 'KNOX' box large enough to contain keys to access each individual tenant space. Installation location(s) to be determined by the fire marshal. The box shall contain clearly marked keys to each tenant space or other areas as determined by the fire marshal. **CFC**

20. **HF61:** Aerial fire apparatus access roads. **Where required**: buildings or facilities **exceeding 30-feet** in height above the lowest level of fire dept. Vehicle access shall be provided access roads capable of accommodating aerial apparatus. **Width:** aerial apparatus access roads shall provide a minimum unobstructed width of **26-feet** in the immediate vicinity of any building exceeding 30-feet in height. **Proximity to buildings:** aerial apparatus access roads shall be located a minimum of 15-feet to a maximum of 30-feet from the building, and shall be positioned parallel to one entire side of the structure, as approved by the fire code official. **CFC APPENDIX D**

WATER:

21. **HF25:** Minimum required fire flow, as determined by California Fire Code Appendix 'B'.
System shall be looped with minimum eight (8) inch mains; six (6) inch laterals, six (6) inch risers; six (6) inch dia. Hydrants with two 2 ½" outlet(s) and one 4" outlet. **CFC APPENDIX B AND C**

Note: Hydrants shall meet EVWD standards.

22. **HF29:** Fire hydrant spacing shall be:
Commercial retail: 300 FEET
CFC / APPENDIX B AND C.

Note: Existing fire hydrants (off-site) can be included if they meet spacing requirements. Hydrants shall not be located at the 'bulb' end of cul-de-sacs.

23. **HF26:** Three sets of water delivery system plans, designed to meet the required fire flow for this project and/or development, shall be submitted to the fire department for review and approval. **CFC**

24. **HF27:** Applicant-developer shall provide a letter from the water company serving the project-development, verifying financial arrangements have been made and bonded for the required water improvements. **CFC**

25. **HF28:** Fire hydrants shall be installed, inspected and operational as per approved water system delivery plans **prior** to any framing, construction or delivery of combustible materials to project site. **CFC / CFC**

26. **HF30:** Private, on site fire hydrant(s) – yard hydrant(s)- capable of supplying required fire flow shall be installed at location(s) identified by the fire department. System shall be looped with minimum eight (8) inch mains; six (6) inch laterals, six (6) inch risers; six (6) inch dia. hydrants with one 2 ½" outlet and one 4" outlet. **CFC / APPENDIX B AND C**

27. **HF38:** Approved fire hydrant(s) capable of supplying required fire flow, shall be provided to all premises upon which facilities, buildings or portions of buildings are constructed or moved within the jurisdiction. When any portion of the facility or building protected is in excess of 150 feet from a fire hydrant on a public street, as measured by an approved route around the exterior of the facility or building, additional fire hydrants or on-site fire hydrants, meeting the required fire flow, shall be provided. **CFC APPENDIX B AND C**

ADDRESSING – IDENTIFICATION:

28. **HF21:** **Commercial** and **multi-family residential** address numbers shall be displayed on all **new and existing** structures in such a manner as to be plainly visible and legible from the access roadway or street. Numerals shall be of a contrasting color to the building and electrically illuminated.
Minimum size of the numerals shall be **8"** height, 3/4" stroke, or as approved by the fire marshal.
Industrial occupancies shall have address numbers of 12" height, 1" stroke and shall be electrically illuminated so as to be visible and legible from access roadway or street.
Note: Depending on height and setback of a building, larger numerals may be required and at additional locations on the building, as determined by a case-by-case review.
HMC

FIRE PROTECTION & ALARM SYSTEMS:

29. **HF36:** Automatic fire sprinklers shall be installed according to **NFPA 13** and fire dept. requirements. Submit three **(3)** sets of shop plans with material cut sheets and hydraulic calculations, indicating the type of occupancy, type of materials to be stored (if any), for fire dept. review and approval prior to any installation. Submit copy of California C-16 license. **CFC; CBC; HMC**

30. **HF37:** Automatic fire sprinkler control devices (P.I.V & O.S.&Y.) Shall be visible from fire dept. access roadway, and identify system being controlled and address of structure.
Fire Dept. Connection (FDC) shall be located no closer than forty (40) feet and not to exceed one hundred fifty (150) from structure. Required fire hydrant shall have a maximum distance from FDC of thirty (30) feet. FDC shall identify address and system of structure being protected. **CFC**

31. **HF41:** A minimum of one 2A-10BC fire extinguisher shall be installed for each 3,000 sq.ft. of floor area. Travel distance to any one fire extinguisher shall not exceed 75 feet. Additional fire extinguishers, size and class to be determined by fire department, may be required. Fire extinguishers shall be serviced bi-annually and shall have a current State Fire Marshall service tag attached. Fire extinguishers are to be serviced every two years and inspected & tagged every year. **CFC; NFPA**

32. **HF43:** An automatic fire detection and alarm system meeting the requirements of CFC 907, CBC and NFPA 72 shall be installed. Three (3) sets of shop plans with material cut sheets and calculations shall be submitted to the fire department for review and approval prior to installation. **CFC; CBC; NFPA**

33. **HF44:** An automatic smoke removal system shall be installed. The system shall comply with CFC and CBC requirements. Three (3) sets of shop plans with material cut sheets and calculations shall be submitted to the fire department for review and approval prior to installation. **CFC; CBC**

34. **HF45:** An automatic smoke ventilation system – fusible link type, shall be installed. Roof vent, venting ratios and draft curtains shall be provided. Three (3) sets of shop plans with material cut sheets and calculations shall be submitted to the fire department for review and approval prior to installation. **CFC**

35. **HF59:** Commercial and industrial buildings, in excess of 20,000 square feet, and with an interior area more than 150 feet from exterior exit, shall be equipped with a class i standpipe system. Standpipe connections shall be configured to reach any portion of interior space within 150 feet in any direction of travel. This system shall be calculated to provide 500 GPM from an adjacent automatic fire sprinkler riser at 100-psi nozzle pressure for two hand lines flowing.

36. **HF60:** California Fire Code, **FIRE SAFETY DURING CONSTRUCTION AND DEMOLITION**, shall apply to this project. it is the responsibility of the project manager to meet with the fire marshal to discuss requirements specific to this project.

37. **HF61**: **TENANT IMPROVEMENT**. Review the 'tenant improvement information' handout. If any of the items listed apply to this project, they must be included in the 'fire department notes' section on the plan.

38. **HF62**: Additional plans for access, fire safety systems, storage or other special condition may be requested for review, conditioning and approval by the fire marshal.

39. **HF63**: Submit to fire marshal's office: **one copy** of building and/or structure plans for fire department review.

40. **HF64:** Spray booths, spray finishing operations shall comply with requirements of California Fire Code

41. **Note:** Fire sprinkler design requirements for Spec warehouse buildings will change depending on type of occupancy, storage heights and/or commodities that are being used or handled.

Craig Sanchez, Fire Marshal
City of Highland Fire Prevention
(909) 864-8732 x 248

Attachment 5

Resolution No. 2021 - ___

Approving Tentative Parcel Map 20384 TPM-21-002

RESOLUTION NO. 2021-___

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF HIGHLAND, CALIFORNIA, APPROVING TENTATIVE PARCEL MAP 20384 (TPM-21-002) TO DECREASE THE NUMBER OF PARCELS FROM SIX (6) TO ONE (1) PARCEL IN ASSOCIATION WITH CONDITIONAL USE PERMIT (CUP-21-007) TO DEVELOP A 305,617 SQUARE FOOT INDUSTRIAL WAREHOUSE, LOCATED AT THE NORTHWEST CORNER OF 6TH STREET AND VICTORIA AVENUE (APNs: 1192-281-09 THROUGH 14)

APPLICANT: PATRIOT USICV VICTORIA, LLC (PATRIOT PARTNERS)

A. RECITALS

1. On June 16, 2021, the Applicant submitted a Tentative Parcel Map (TPM) Application for Parcel Map No. 20384 (TPM-21-002) to consolidate all parcels associated a 305,617 square foot warehouse development project. Related entitlements include Conditional Use Permit CUP-21-007, Variance VAR-21-001, and Design Review Application DRA-005.

2. The project site has a General Plan and Zoning Designation of Business Park (BP) which requires approval of a Conditional Use Permit for the establishment of a warehouse.

3. On December 21, 2021, the Planning Commission of the City of Highland, conducted a duly noticed Public Hearing on the Subject Application.

4. All legal prerequisites to the adoption of this Resolution have occurred.

B. RESOLUTION

NOW THEREFORE, it is hereby found, determined and resolved by the Planning Commission of the City of Highland as follows:

1. The Planning Commission finds that all of the facts set forth in the Recitals, Part "A" of this Resolution, are true and correct.

2. The City of Highland Planning Commission after due consideration, inspection, investigation and study made by itself and on its behalf, and after due consideration of all evidence and reports offered at said hearing, including the staff report to the Planning Commission dated December 21, 2021, and which is incorporated herein by this reference, does find and determine the following facts:

a. All necessary public meetings and opportunities for public testimony and comment have been conducted in compliance with State Law and the Municipal Code of the City of Highland.

3. Tentative Parcel Map 20384 proposes to merge six (6) lots into one (1) on approximately 12.29 acres.

4. A duly noticed public hearing was held by the Planning Commission on December 21, 2021, in the City Hall Council Chambers and notice of the time, date, place and purpose of the aforesaid hearing was given as required by applicable law. At the public hearing, the Planning Commission took testimony, both written and oral, from various parties, including the Applicant.

5. Tentative Parcel Map No. 20384 complies with the provisions of Chapter 16.68 *Land Divisions* of the Highland Municipal Code.

6. Tentative Parcel Map No. 20384 complies with the Subdivision Map Act, Sections 66410-66499.58 of the Government Code of the State of California.

7. Pursuant to the California Environmental Quality Act (CEQA) Guidelines, an Initial Study was prepared for the project. It was determined that Mitigation Measures were necessary to address potential impacts. A Notice of Intent to adopt a Mitigated Negative Declaration (MND) was circulated and Mitigation Monitoring and Reporting Program prepared for consideration by the Commission.

8. Findings of Fact for Tentative Parcel Map No. 20384 (TPM-21-002):

a. That the proposed map is consistent with applicable General and Specific Plans as specified in Section 65451.

Response: The project site has a General Plan designation of Business Park which cites appropriate uses to "include light manufacturing, wholesaling and warehousing conducted within an enclosed building." It meets Goal 2.5 to, "promote a mix of attractive employment-generating areas with a mix of uses that provide a sound and diversified economic base and that are compatible with the community's overall residential character" and Goal 2.14 to, "establish the Victoria Avenue Corridor as the major entryway into the San Bernardino International Airport." It is not located within a Specific Plan area.

b. That the design or improvement of the proposed subdivision is

consistent with applicable General and Specific Plans.

Response: The subdivision and warehouse improvement are consistent with the design criteria of the General Plan's Victoria Avenue Corridor, Goal 2.14, Policies 1-6, including allowing for a mix of commercial and residential uses, encourage the consolidate of parcels to promote quality, planned development and to consolidate access points along Victoria Avenue to improve traffic flow.

The improvement is also consistent with the Community Design Element Corridor Streetscape Plan to, "create grand entryways to San Bernardino International Airport with formal landscaping along 3rd Street, 5th Street, and Victoria Avenue." It incorporates the City's logo to create community identity, incorporates public art, and begins what is hoped to be a unifying streetscape element as the Corridor develops. It meets the policies of Goal 10.8 to, "ensure that industrial and business park development is professional and attractive in appearance through coordinated site planning, signage and architectural design guidelines.

c. That the site is physically suitable for the type of development.

Response: The project site is more than adequate for industrial development as it combines six (6) parcels for a total of 12.29 acres. The minimum lot size in the District is 1 acre. It is relatively flat and will require the demolition of aged housing stock on three (3) of the lots. There are no geographic or man-made impediments to the development of a warehouse on this site. There are utilities available within the adjacent right-of-way and drainage is good for on-site water retention and water quality treatment.

There is access to the site from three of its four sides and it is in proximity to other sites zoned for Business Park uses. It is also located within a half mile of the San Bernardino Airport and one and a half mile of the 210 Freeway.

d. The site is physically suitable for the proposed density of development.

Response: Per Municipal Code Section 16.24.040 Employment District Development Standards, the maximum lot coverage is 60%. The project calls for 57.1%. It meets the minimum lot size, lot width and dept as well as required building setbacks and landscape coverage.

e. That the design of the subdivision or the proposed improvements are not likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.

Response: The Site lies in an urbanized area and was analyzed for impacts through its CEQA Initial Study. The site was previously developed with three (3) single family homes in an equestrian and farming setting. With the appropriate mitigation, as proposed, the transition into a Business Park related use will not have any significant effects. It will not harm fish, wildlife or their habitat. There are no endangered or protected animals onsite.

f. That the design of the subdivision or the type of improvements is not likely to cause serious public health problems.

Response: The proposed project has been reviewed and conditioned by the City's Engineering, Building and Safety, Planning Divisions and Fire Department so that the design of the subdivision or the types of improvements will meet all local, state and federal codes as they relate to warehousing uses. It is in an urbanized area and will improve onsite conditions with the undergrounding of utilities and construction of infrastructure within the public right-of-way on Victoria Avenue, Grape Street and 6th Street. It is a speculative warehouse and any future tenant will be reviewed for any potential public health impacts.

g. That the design of the subdivision or the type of improvements will not conflict with easements, acquired by the public at large, for access through or use of, property within the proposed subdivision. In this connection, the governing body may approve a map if it finds that alternate easements, for access or for use, will be provided, and that these will be substantially equivalent to ones previously acquired by the public. This subsection shall apply only to easements of record or to easements established by judgment of a court of competent jurisdiction and no authority is hereby granted to a legislative body to determine that the public at large has acquired easements for access through or use of property within the proposed subdivision.

Response: The merging of parcels, and the new parcel design, will not conflict with easements for access through, or use of, property within the proposed subdivision. There is a single owner and any needed easement will be noted on the map. The project is conditioned so as not to conflict with any easements of record or judgement of court.

9. This project is not within a high fire severity zone. Findings required by Government Code section 66474.02 are not applicable.

10. The project is not subject to the Williamson Act. Findings required by Government Code section 66474.4 are not applicable.

11. Based on the Findings and Conclusions set forth above, the Planning Commission approves Tentative Parcel Map No. 20384 (TPM No. 21-002) to merge six (6) parcels into one (1). for the development of a 305,617 square foot warehouse subject to the Conditions of Approval attached hereto and incorporated by reference:

Attachments: 1 – Conditions of Approval

PASSED, APPROVED AND ADOPTED this 21st day of December, 2021.

_____
Randall Hamerly, Chairman

ATTEST:

_____
Lawrence A. Mainez
Community Development Director

CITY OF HIGHLAND
PLANNING DIVISION CONDITIONS OF APPROVAL

Date:	December 21, 2021
Applicant:	Patriot USICV Victoria, LLC (Patriot Partners)
File/Index:	**Tentative Parcel Map No. 20384 / TPM-21-002**
Proposal:	Merging six (6) lots into one lot (1) to accommodate the development of an approximately 305,617 square foot warehouse and related facilities.
Location:	A 12.29 acre site at the NWC of Victoria Avenue and 6th Street. APNs: 1192-281-09 through 14
Related Entitlements:	CUP-21-007, DRA-21-005, and VAR-21-001

PLANNING CONDITIONS OF APPROVAL

Note: These conditions represent Planning Conditions and are meant to be one part of overall conditions that may include, but are not limited to, Engineering, Fire Department and Building and Safety conditions of approval. All required on-site and off-site improvements shall be completed and approved prior to final inspection for occupancy unless otherwise stated herein.

The Tentative Tract Map Application has been conditionally approved, subject to compliance with the requirements as specified below. The conditions listed below are continuing conditions. Failure of the Applicant and/or developer to comply with any or all of said conditions at any time shall result in the revocation of the application.

a. Unless all conditions have been complied with and the tentative parcel map authorized by this application has occurred within thirty-six (36) months from the approval date of this tentative parcel map application, this tentative parcel map application shall expire and be null and void without further action by the City of Highland.

b. Where circumstances beyond the control of the Applicant cause delays which do not permit compliance within the time limitation established in this Section, the Community Development Director may grant an extension of time for a period of time not to exceed an additional thirty-six (36) months. An application for an extension of time must be set forth in writing, stating the reasons for the extension, and must be filed with the Planning Division a minimum of thirty (30) calendar days prior to the expiration of the tentative parcel map. Such application shall be filed together with the City's processing fee, as established by the City Council.

PLANNING CONDITIONS

2. The subject property shall be developed in accordance with plans and materials approved by the Planning Commission on December 21, 2021.

3. Tentative Parcel Map Application 21-002 approves the merging of six (6) parcels into one (1) parcel. The site is approximately 12.29 acres.

4. Revisions, modifications, and/or deletions to the approved plans must be submitted to the Planning Division for review and approval.

5. Easements of Record not shown on the Tentative Map shall be relinquished or relocated. Lots affected by Easements or Easements of Records, which cannot be relinquished or relocated, shall be redesigned subject to review and approval of the Assistant Community Development Director.

6. The Site lies within a Business Park (BP) Zone and all future development shall occur in accordance with the zone and all other related Highland Municipal Code provisions.

7. In compliance with the Highland Municipal Code, the Applicant/Owner shall agree, at his/her sole cost and expense, to defend, indemnify, and hold harmless, the City, its officers, employees, agents, and consultants, from any claim, action, or proceeding brought by a third-party against the City, its officers, agents, and employees, which seeks to attack, set aside, challenge, void, or annul an approval of the City Council, Planning Commission, or other decision-making body, including staff, concerning this project. The City may, at its sole discretion, participate at its own expense in the defense of any such action but such participation shall not relieve the Applicant/Owner of his/her obligations under this condition.

8. The Applicant/Owner of the property shall submit to the Planning Division written evidence of agreement with all conditions of this approval before the approval becomes effective.

9. The Applicant/Owner is responsible for implementing all conditions of approval to the satisfaction of the Community Development Director, City Engineer, Fire Department, and Police Department. No final inspection or clearances shall be given until all conditions are met. Each condition of approval is separately enforced, and if one of the conditions of approval is found to be invalid by a court of law, all the other conditions shall remain valid and enforceable.

10. Prior to recordation of the parcel map, the new legal description and plat map shall be submitted for review and approval with the Engineering Division. Prior to recordation of the parcel map the owner/applicant shall pay all applicable plan

check fees.

11. Notice of this parcel map shall be filed will the county of San Bernardino and proof of recordation of the deed or record of survey shall be provided to the Engineering Division within one (1) year of approval of this parcel map.

12. Conditions of Approval for the related entitlements apply; CUP-21-007, DRA-21-005, and VAR-21-001.

City of Highland

Engineering Department
Conditions of Approval
(CUP 21-007 & DRA 21-005 & TPM 20384) Patriot NWC of 6th Street and Victoria Avenue

---

A - Required Prior to Map Approval
B - Required Prior to Building Permit/Construction
C - Required Prior to Building Occupancy
D - Ongoing
E - Required Prior to Grading Permit
* - Non Standard Conditions

Soils/ Geology/ Grading

E 1. Design grading and landscaping plans to comply with the City's clear sight triangle criteria at public street intersections and at private driveways. Walls, fencing, monument signs, slope, and landscaping, within the clear sight triangle, must not exceed thirty inches in height measured from the flowline of the street, unless a sight distance analysis that demonstrates sight distance is adequately maintained is submitted to and approved by the City Engineer.

B 2. Submit a preliminary soils report, prepared by a licensed Geotechnical Engineer, for review and approval by the City Engineer. Comply with the recommendations contained in the report and any amendments thereof as approved by the City Engineer.

E 3. Submit rough and/or precise grading plans to the City Engineer for review and approval. Comply with the City of Highland grading standards as shown on the grading plan checklist.

B 4. Submit the structural design and location for any required retaining walls for review and approval by the City Engineer. Construct concrete v-ditches and drainage system at the back of retaining walls in accordance with the Grading Plan Checklist and as required by the City Engineer.

E 5. Submit an erosion control plan to minimize potential increases in erosion and sediment transport during construction activity for City Engineer approval. Place erosion control measures during or after grading work as required by the City Engineer.

E 6. Design short-term erosion control in accordance with Best Management Practices such as, hydroseeding, mulching, jute matting or plastic sheeting to protect slopes; silt fencing to control site perimeter; and straw bale barriers, sand bag barriers, rock filters or sediment basins to control internal erosion, or other methods to stabilize disturbed areas, as approved by the City Engineer.

D 7. Implement dust control measures during construction activities including, but not limited to, daily watering of construction area as frequently as necessary during active and inactive periods, utilizing soil emulsions, limiting construction vehicle speed to 10 miles per hour, stabilizing construction entrances to prevent trackout of sediments, and street sweeping.

E 8. Design grading to intercept and conduct off-site tributary drainage flow around or through the project site in a manner that does not adversely affect adjacent properties. Conveyance of on-site and off-site tributary flows shall be maintained by the underlying property owner.

E 9. Design grading to drain the entire area of the project to the proposed Water Quality Management Plan (WQMP) infiltration basins and to accommodate overflows as necessary.

E* 10. Plot all existing and proposed easements on grading plan and note disposition of any existing utilities, appurtenances, fences, and access roads.

D* 11. Construct temporary sedimentation basins for use during the grading and construction period of the project. Do not start using the proposed infiltration basins until the site is stabilized for erosion and sedimentation.

B 12. Submit original wet signed and stamped rough grading certifications from the soils engineer and the grading engineer, along with compaction reports, to the City Engineer.

C 13. Submit original wet signed and stamped final grading certification from the grading engineer, to the City Engineer.

STREET IMPROVEMENT

E* 14. Remove existing overside drain, earthen drainage ditch, curb and gutter along westsdie of Victoria Avenue and construct new street improvements across the entire Victoria Avenue frontage of the project. Construct new street improvements including, but not limited to, 6" curb and gutter located 40' west of street centerline, 6'-wide curb-adjacent sidewalk, commercial drive approaches at locations determined in final engineering, and street lights. Design the limits and extent of removal of existing improvements, and construction of transitional improvements, as directed by the City Engineer.

E* 15. Construct new asphalt concrete pavement with class II aggregate base improvements to centerline of Victoria Avenue (T.I.=9) asphalt concrete pavement with class II aggregate base. Construct a 4" mill and fill for the northbound #1 on Victoria Avenue. Design the limits and extent of removal of existing improvements, and construction of transitional improvements, as directed by the City Engineer.

E* 16. Remove existing improvements along northside of 6th Street and construct new street improvements across the entire 6th Street frontage of the project. Construct new street improvements including, but not limited to, 6" curb and gutter located 22' north of street centerline, 6'-wide curb-adjacent sidewalk, and street lights. Design the limits and extent of removal of existing improvements, and construction of transitional improvements, as directed by the City Engineer.

E* 17. Construct new asphalt concrete pavement with class II aggregate base improvements to centerline of 6th Street (T.I.=8) asphalt concrete pavement with class II aggregate base. Design the limits and extent of removal of existing improvements, and construction of transitional improvements, as directed by the City Engineer. Eastbound 6th Street, south of centerline, will be rehabilitated by others at the end of EVWD's SNRC project.

E* 18. Remove existing improvements along eastside of Grape Street and construct new street improvements across the entire Grape Street frontage of the project. Construct new street improvements including, but not limited to, 6" curb and gutter located 26' east of street centerline, 6'-wide curb-adjacent sidewalk, and street lights. Design the limits and extent of removal of existing improvements, and construction of transitional improvements, as directed by the City Engineer.

E* 19. Construct new asphalt concrete pavement with class II aggregate base improvements to 12' west of centerline of Grape Street (T.I.=8) asphalt concrete pavement with class II aggregate base. Design the limits and extent of removal of existing improvements, and construction of transitional improvements, as directed by the City Engineer.

C* 20. Construct commercial drive approaches with curb returns per City Standard 213. Note 4.5' sidewalk easement will be required back of commercial drive approach (Std. 213).

C 21. Construct private ingress/ egress improvements at the northerly of Grape Street driveway to permit right in and left out only truck movement.

E 22. Submit engineering plans for street improvements and signing & striping to the City Engineer for review and approval. Indicate the location of any existing utility/facility which would affect construction on plans and profiles. Comply with the City design standards as shown on the street and storm drain improvement checklist. Provide ADA access to site from right of way.

C 23. Install traffic control signs and pavement markings, with locations and types approved by the City Engineer. Modify Victoria Avenue striping to provide northbound left turn pocket at the northerly truck entrance, per City Standards.

B 24. Design and construct public improvements including sidewalk, driveway approaches and access ramps in accordance with all requirements of the State of California Accessibility Standards, Title 24 California Administrative Code. Redesign and reconstruct existing frontage improvements if found not in compliance with City Standards.

C* 25. Install new LS3 metered street light system along the project frontages. The new street lights, electrical conduits, wiring and meter etc. will be owned and maintained by the City. The street lights shall be equipped with a Light Emitting Diode (LED) luminaire on a marbelite pole with types and at the location specified by the City Engineer. Pay the City street lighting energy and maintenance charges for the initial 12 months.

C 26. Submit "Record Revisions" to all plans to reflect the improvements as constructed, and any changes made during construction.

WATER QUALITY/ DRAINAGE

E 27. Obtain approval by the City Engineer of a Final Water Quality Management Plan (F-WQMP), prepared in accordance with the City's National Pollutant Discharge Elimination System (NPDES) permit requirements in effect at the time the Conceptual Water Quality Management Plan was approved unless subsequent City NPDES permits require otherwise. The F-WQMP shall (1) be prepared, signed, and sealed by a licensed Civil Engineer, (2) include Site Design Low Impact Development and Source Control Best Management Practices (BMPs) appropriate for residential development, (3) include a BMP implementation, operation, and funding mechanism, and (4) be certified by the property owner. The property owner shall also enter into a Stormwater BMP Transfer, Access, and Maintenance Agreement with the City on standard City form. Include a copy of the

recorded agreement in the F-WQMP. Construct BMPs in accordance with the approved F-WQMP.

C* 28. Construct and implement site design BMPs specified in the project approved F-WQMP including, but not limited to, pretreatment devices approved at time of C-WQMP approval, underground infiltration systems, and raised curb landscaped areas and parking lot islands. Alternate site design BMPs which are equally effective may be submitted for review and approval by the City Engineer.

E 29. Include the project grading plan, landscape plan and utility plan with the first submittal of the F-WQMP.

C 30. Submit two sets of WQMP BMP Exhibits with a "WQMP BMP As-Built Certificate" wet signed and sealed by the Engineer of Record. The Certificate shall state:

"I hereby certify that the Water Quality Management Plan Best Management Practices have been constructed under my supervision in accordance with the approved plans and are functional to the best of my knowledge."

C* 31. Construct on-site private drainage system, HDPE or other pipe material as approved by City Engineer, to drain the entire project site to the proposed WQMP BMPs in accordance with the approved Final Water Quality Management Plan, and construct necessary drainage overflow facilities. Construct an overflow pipe to convey any overflow from the proposed underground infiltration system to 6th Street as necessary.

B 32. At the underground infiltration system proposed by the Final WQMP, conduct at least two new infiltration tests using a double-ring infiltrometer. The tests shall be conducted at the proposed chamber system subgrade elevation, prior to the submittal of the F-WQMP. After obtaining the results from the two tests, the engineer and geotechnical engineer shall determine if additional testing is required.

C 33. Register the underground chambers with EPA as a Class V Injection Well.

E 34. Submit a hydrology study to determine storm runoff quantities tributary to and generated by the Project for review and approval by the City Engineer. Include hydraulic calculations to determine the size and type of all drainage facilities.

E 35. Submit engineering plans for public and private drainage systems to the City Engineer for review and approval. Indicate the location of any existing utility facility which would affect construction on plans and profiles. Comply with the City design standards as shown the street and storm drain improvement checklist.

E 36. Construct Victoria Avenue catch basin at existing sump and location of overside drain. Construct public storm drain outlet from new catch basin to convey captured flows from the westside of Victoria Avenue into the existing culvert at the west side of the 6th Street and Victoria Avenue intersection. Construct storm drain stub out from this storm drain to connect to future drainage improvements planned and designed to be constructed at the ultimate configuration of the 6th Street and Victoria Avenue intersection as directed by the City Engineer.

DEDICATION/ANNEXATION

C* 38. Apply to the City to annex the project into the City's Consolidated Landscape District (LMD) for potential City maintenance of parkway and frontage landscaping along 6th Street and Victoria Avenue. The City will maintain parkway and frontage landscaping utilizing LMD revenue only if the City determines that adequate maintenance is not being provided by the property owner. The potential future amount of assessment will include the estimated on-going maintenance cost and one-time construction cost to convert the privately-maintained system to the City-maintained system.

C* 39. Apply to the City to annex the project into the City's Landscape Maintenance District (LMD) for maintenance of future median landscaping along Victoria Avenue median. Sign the ballots prepared by the City agreeing to the annexation, and the potential future amount of assessment. Assessment for Victoria Avenue median landscaping will commence the year Victoria Avenue median is constructed by the City or other future developments. Landscaping within the median shall be maintained by the City.

B* 40. Dedicate an irrevocable offer of dedication, (1) a 10-foot wide minimum landscape easement across the Victoria Avenue and 6th Street frontage, in addition to the required street right-of-way, as approved by the City Engineer, (2) a temporary construction easement granting permission for the City to enter the property to construct and restore landscaping. The exact dimensions of the landscape easement will be determined at the time on-site improvement plans have been prepared.

E* 41. If the site is ever subdivided in the future, the Project will be required to grant a reciprocal private easement in favor of the parcels created for vehicular access, including emergency access.

A* 42. If the site is ever subdivided in the future, record a reciprocal private easement for drainage, and utilities.

B 43. Record a Final Map with the San Bernardino County Recorder pursuant to the provisions of the State Subdivision Map Act. Submit a duplicate photo mylar of the map recorded with the San Bernardino County Recorder.

A 44. At the time of Final Map submittal, include traverse calculation sheets which show error of closure, copies of recorded maps and deeds used as reference and/or showing original land division, tie notes and bench marks referenced, and a current title report. Inverse calculations will not be accepted for plan check.

A 45. Include an Improvement Certificate/Statement on the Parcel Map in accordance with Section 66411.1 of the Subdivision Map Act.

FEES/PERMITS

C* 46. Pay an in lieu fee for the design and construction of the future raised landscape median along the project frontage of Victoria Avenue, as determined by the City Engineer.

C* 47. Pay an in lieu fee for the design and construction of the future traffic signal at 6th Street and Victoria Avenue, as determined by the City Engineer.

C* 48. Pay City processing fee for application of Development Impact Fee (DIF) credits for street, drainage, and median improvements pursuant to adopted City Council DIF Credit Policy.

D 49. Pay appropriate Engineering fees for district annexation, plan check, WQMP review, traffic report review, hydrology study review, structural calculation review, on-site and off-site inspection, utility excavation permits, GIS map plan update, microfilming and storage of maps and plans, and other required fees.

D 50. Obtain a permit from Engineering prior to any on-site construction or construction within the public right-of-way and obtain permit from Caltrans prior to any construction within or impacting Caltrans Access Control areas.

E 51. Post a deposit for erosion control which shall not be released prior to completion of all on-site construction.

A 52. Post a deposit for monumentation based on an estimate of the cost to perform the work by the project surveyor or engineer. The deposit shall not be released prior to written verification from the surveyor or engineer that the monuments have been set and payment for the work has been received.

UTILITIES/ CONSTRUCTION

E 53. Obtain written permission from the adjoining property owners for offsite grading and/or construction, if any.

B 54. Install construction fencing and screening in accordance with Building and Safety Division Policy 335.

C 55. Reconstruct existing public improvements removed or damaged during construction. Pavement repair, which may include A.C. overlay, T-cut trench repair and/or slurry seal after removal of existing striping shall be across all or a portion of damaged pavement caused by this project as determined by the City Engineer.

C 56. Coordinate, and where necessary, pay for the relocation of any existing public utilities as necessary.

C 57. Provide all utility services to each building, including sanitary sewers, water, electric power, gas, cable TV, internet, and telephone. All utilities listed under Highland Municipal Code Section 16.40.380 (A) are to be underground per Ordinance 315.

E 58. Comply with applicable requirements of the National Pollutant Discharge Elimination System (NPDES) permit program. Provide written verification from the Regional Water Quality Control Board specifying the projects WDID number.

B 59. Destroy any abandoned wells on the property or similar structures that might result in contamination of underground waters in a manner approved by the City Engineer.

B 60. All underground structures, except those desired to be retained, must be broken in, backfilled, and inspected before covering.

D 61. Comply with the prevailing City design and construction standards and requirements at the time of permit issuance.

B 62. Design and construct a trash enclosure per City Standard 700.

C 63. Install telephone, cable television, and internet enclosures underground whenever the underground installation is an available option offered by the utility companies. If the underground installation is not an available option and utility enclosures must be installed above ground, install the above-ground utility enclosures and any flush mount utility enclosures at locations where construction of retaining walls will not be necessary for compliance with the setback requirements of the utility companies.

B* 64. Submit a Composite Utility Plan indicating the location of all above ground and flush mount water, electric, cable TV, internet, and telephone utility structures prior to City issuance of utility permits.

B 65. Underground existing overhead utilities along Victoria Avenue and Grape Street frontages per Ordinance 434.

ATTACHMENT 6

Resolution No. 2021 - ____

Approving a Mitigated Negative Declaration

(MMRP & IS/MND Attached)

PC RESOLUTION NO. 2021 – ____

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF HIGHLAND, CALIFORNIA, ADOPTING A MITIGATED NEGATIVE DECLARATION AND MITIGATION MONITORING AND REPORTING PROGRAM FOR THE DEVELOPMENT OF A 305,617 SQUARE FOOT WAREHOUSE AND ASSOCAITED IMPROVEMENTS AT THE NORTHWEST CORNER OF 6TH STREET AND VICTORIA AVENUE. RELATED ENTITLEMENTS INCLUDE CONDITIONAL USE PERMIT CUP-21-007, DESIGN REVIEW APPLICATION DRA-21-005, VARIANCE VAR-21-001 AND TENTATIVE PARCEL MAP 20384/TPM-21-002. ASSESSOR'S PARCEL NUMBERS 1192-281-09 THROUGH 14.

APPLICANT: PATRIOT USICV VICTORIA, LLC (PATRIOT PARTNERS)

A. RECITALS

1. On June 16, 2021, the Applicant filed applications for Conditional Use Permit CUP-21-007 to develop a 305,617 square foot industrial warehouse and associated improvements including loading docks, tractor-trailer stalls, passenger vehicle parking spaces, a stormwater detention/infiltration basin, and landscape area requiring approval of a Conditional Use Permit. Related applications were also filed for Design Review including a Site Plan, Building Elevations, Rough Grading Plan, conceptual Landscape Plan; Variance VAR-21-001 to increase the maximum building height permitted to 45'; and Tentative Parcel Map 20384/TPM-21-002 to merge six (6) parcels into one (1).

2. Pursuant to the provision of the California Environmental Quality Act (CEQA) and State and Local CEQA Guidelines, the City of Highland is the Lead Agency, and is charged with the responsibility of deciding whether or not to approve the proposed Project.

3. The Initial Study prepared for the Project was made available for public review from November 5, 2021 to December 9, 2021.

4. The Initial Study finds that either no impact or less than significant impacts would be associated with the issues of Aesthetics, Agricultural and Forestry Resources, Energy, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population/Housing, Public Services, and Recreation, Transportation and Traffic, Wildfire, and Utilities and Services Systems

5. The Initial Study also finds that the issues of Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Tribal Cultural Resources require the implementation of mitigation measures to reduce impacts to a less than significant level, and a Mitigated Negative Declaration is the appropriate document for this project.

6. On December 21, 2021, the Planning Commission of the City of Highland, conducted a Public Hearing on the subject Project and concluded the Hearing on that date.

7. All legal prerequisites to the adoption of this Resolution have occurred.

B. RESOLUTION

NOW THEREFORE, it is hereby found, determined and resolved by the Planning Commission of the City of Highland as follows:

Section 1. The Planning Commission finds that all of the facts set forth in the Recitals, Part "A" of this Resolution, are true and correct.

Section 2. Based upon substantial evidence presented to the Planning Commission during the December 21, 2021, Public Hearing, including public testimony and written and oral Staff Reports, the Planning Commission finds as follows:

a. All necessary Public Meetings and opportunities for public testimony and comment have been conducted in compliance with State Law and the Municipal Code of the City of Highland.

Section 3 The Planning Commission hereby adopts the Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program, both of which are attached hereto and incorporated herein by reference.

Section 4. The Planning Commission hereby instructs City staff to file a Notice of Determination with the Clerk of the Board of the Supervisors of the County of San Bernardino, pursuant to the Public Resources Code and State CEQA Guidelines.

C. ADOPTION OF RESOLUTION.

The City Clerk shall certify to the adoption of this Resolution and shall cause the same to be published or posted in the manner prescribed by law.

PASSED, APPROVED AND ADOPTED this 21st day of December, 2021.

ATTEST:

Randall Hamerly, Chairman
Planning Commission

Lawrence A. Mainez,
Community Development Director

Mitigation Monitoring and Reporting Program
Initial Study/Mitigated Negative Declaration
6th Street and Victoria Avenue Warehouse Project

Lead Agency:

City of Highland
27215 Base Line
Highland, California 92346
Contact: Kim Stater, Assistant Community Development Director

Prepared for:

Patriot Development Partners
12126 West Sunset Boulevard
Los Angeles, California 90049
Contact: Kevin Rice, Principal

Prepared by:

DUDEK
27215 Base Line
Highland, California 92346
Contact: Sean Kilkenny, Senior Project Manager

NOVEMBER 2021

Printed on 30% post-consumer recycled material.

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2 MITIGATION MONITORING AND REPORTING PROGRAM TABLE 2

TABLES

Table 1 Mitigation Monitoring and Reporting Program 2

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1 Introduction

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

This Mitigation Monitoring and Reporting Program (MMRP) will be used by the City of Highland (City) to ensure compliance with adopted mitigation measures identified in the MND for the proposed 6th Street and Victoria Avenue Warehouse Project (project) when construction begins. The City, as the lead agency, will be responsible for ensuring that all mitigation measures are carried out. Implementation of the mitigation measures would reduce impacts to below a level of significance for air quality, biological resources, cultural resources, geology and soils (paleontological resources), hazards and hazardous materials, and tribal cultural resources.

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

City of Highland
Planning Department
27215 Base Line
Highland, California 92346

2 Mitigation Monitoring and Reporting Program Table

Table 1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
Air Quality				
MM-AQ-1: Fugitive Dust Watering. To reduce the potential for criteria air pollutants, specifically fugitive particulate matter with an aerodynamic diameter less than or equal to 2.5 microns ($PM_{2.5}$), as a result of construction of the project, the applicant shall: Comply with SCAQMD rules and regulations regarding emissions generated during construction activities. Rule 403, Fugitive Dust,[1] requires the implementation of measures to control the emission of visible fugitive/nuisance dust, such as wetting soils that would be disturbed. By rule, active sites would be watered at least two times daily, resulting in an approximately 55% reduction of fugitive dust (CalEEMod default value), to further control fugitive PM2.5, the project applicant, or its designee, shall water active sites at least three times daily resulting in an approximately 61% reduction of fugitive dust (CalEEMod default value).	During construction	Project applicant and their construction contractor	City of Highland Building & Safety Division	
MM-AQ-2: Tier 4 Interim Engines. To reduce the potential for criteria air pollutants, specifically particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM_{10}), as a result of construction of the project, the applicant shall:	Prior to and during construction	Project applicant and their construction contractor	City of Highland Building & Safety Division	

[1] SCAQMD Rule 403 requires implementation of various best available fugitive dust control measures for different sources for all construction activity sources within its jurisdictional boundaries. Dust control measures include, but are not limited to, maintaining stability of soil through pre-watering of site prior to clearing, grubbing, cut and fill, and earth-moving activities; stabilizing soil during and immediately after clearing, grubbing, cut and fill, and other earth-moving activities; stabilizing backfill during handling and at completion of activity; and pre-watering material prior to truck loading and ensuring that freeboard exceeds 6 inches. While SCAQMD Rule 403 requires fugitive dust control beyond watering control measures, compliance with Rule 403 is represented in CalEEMod by assuming two times daily watering of active sites (55% reduction in PM_{10} and $PM_{2.5}$ [CAPCOA 2017]).

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
Prior to the start of construction activities, ensure that all 75 horsepower or greater diesel-powered equipment are powered with CARB-certified Tier 4 interim engines, except where the project applicant establishes to the satisfaction of the City of Highland (City) that Tier 4 interim equipment is not available. An exemption from these requirements may be granted by the City in the event that the City documents that equipment with the required tier is not reasonably available and corresponding reductions in criteria air pollutant emissions are achieved from other construction equipment. Before an exemption may be considered by the City, the applicant shall be required to demonstrate that two construction fleet owners/operators in San Bernardino County were contacted and that those owners/operators confirmed Tier 4 interim equipment could not be located within San Bernardino County.				
Biological Resources				
MM-BIO-1: Nesting Birds. Commencement of construction activities shall avoid the February 1 through August 31 bird nesting season to the greatest extent feasible. If construction activities must begin within this nesting season, a survey for nesting birds shall be conducted by a qualified biologist within 72 hours before commencement of construction activities. The area surveyed shall include all clearing/construction areas, as well as areas within a 500-foot buffer around the site, or as otherwise determined by the biologist. If no active bird nests are identified on, or within the 500-foot buffer, no further action is necessary and construction activities could commence. If active nests are found during pre-construction surveys or at anytime throughout the course of construction	Prior to and during construction	Project applicant and their construction contractor	City of Highland Planning Division	

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
activities during the nesting bird season, all clearing/construction activities within a minimum 100 feet of the nest shall be postponed until a wildlife biologist has identified the nesting species. If the avian species is protected under the Migratory Bird Treaty Act and/or the California Fish and Game Code, a minimum buffer zone shall be established by the qualified biologist based on the type of bird/raptor species identified and the construction buffer shall be established on site through the erection of cones/flagging/fencing to clearly delineate the protection zone. All construction activities shall avoid this protection zone until a qualified biologist has confirmed that the nest(s) is no longer active, the nest is vacated, and there is no evidence of second nesting attempts.				
Cultural Resources				
MM-CUL-1: Preparation of a Cultural Resources Monitoring Plan A qualified archaeological principal investigator, meeting the Secretary of the Interior's Professional Qualification Standards, shall prepare a Cultural Resources Monitoring Plan (CRMP) in consultation with Tribes that requested consultation under AB 52. 2. The CRMP shall include a requirement for all construction personnel to complete a WEAP training prior to commencement of construction activities as outlined in MM-CUL-2. The CRMP shall stipulate the location and timing of archaeological and Native American monitoring based on MM-CUL-3. The qualified archaeologist principal investigator shall review engineering plans for the project to determine where ground disturbing activities will exceed the depths of artificial fill within the project site to determine the timing and locations of monitoring to be included in the CRMP. The CRMP shall include monitoring protocols to be carried out during project-related construction. The CRMP shall	Prior to construction	Project applicant and their construction contractor	City of Highland Planning Division	

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
stipulate a Native American monitor, associated with any of the Tribes that have been consulted with under AB 52, be retained to monitor project-related ground disturbance stipulated in the CRMP. The CRMP shall contain an allowance that the qualified archaeologist principal investigator, based on observations of subsurface soil stratigraphy or other factors during initial grading, and in coordination with the Native American monitor(s) and the City, may reduce or discontinue monitoring as warranted if it is determined that the possibility of encountering archaeological or tribal cultural deposits is low. The CRMP shall outline the appropriate measures to be followed in the event of unanticipated discovery of cultural and tribal cultural resources during program implementation, including that all ground disturbance within 60 feet of an unanticipated discovery shall cease until a treatment plan is developed by the qualified archaeologist principal investigator in coordination with the City and the Native American monitor(s) and which will consider the resources archaeological and tribal value. The CRMP shall identify avoidance as the preferred manner of mitigating impacts to cultural resources. The CRMP shall establish the criteria utilized to evaluate the significance (per CEQA) of the discoveries, methods of avoidance consistent with CEQA Guidelines Section 15126.4(b)(3), as well as identify the appropriate treatment to mitigate the effect of the project if avoidance of a significant resource is determined to be infeasible. The plan shall also require the preparation of a monitoring report following the completion of all ground disturbing activities for the project. The monitoring report will be submitted to the City for review and comment and a final copy will be filed at the SCCIC. The CRMP shall be submitted to the City and the appropriate Native American representatives who have been consulted with under AB 52 for review prior to the City's issuance of a grading permit and the start of project-related ground disturbance.				

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
MM-CUL-2: All construction personnel and monitors who are not trained archaeologists shall be briefed regarding inadvertent discoveries prior to the start of construction activities. A basic presentation and handout or pamphlet shall be prepared in order to ensure proper identification and treatment of inadvertent discoveries. The purpose of the Workers Environmental Awareness Program (WEAP) training is to provide specific details on the kinds of archaeological materials that may be identified during construction of the project and explain the importance of and legal basis for the protection of significant archaeological resources. Each worker shall also learn the proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the site supervisor and archaeological monitor.	Prior to construction	Project applicant and their construction contractor	City of Highland Planning Division	
MM-CUL-3: A qualified archaeologist shall be retained and on-call to respond and address any inadvertent discoveries identified for the duration of construction activities. Additionally, in consideration of the potential to encounter intact cultural deposits beneath fill soils, the qualified archaeologist shall monitor ground disturbing activities between 12–18 inches below current grade and shall survey the project site once fill soils have been removed to ensure no cultural deposits underly the fill layer. A qualified archaeological principal investigator, meeting the Secretary of the Interior's Professional Qualification Standards, shall oversee and adjust monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) based on the observed potential for construction activities to encounter cultural deposits or material. The archaeological monitor will be responsible for maintaining daily monitoring logs.	During construction	Project applicant and their construction contractor	City of Highland Planning Division	

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
In the event that potential prehistoric or historical archaeological resources (sites, features, or artifacts) are exposed during construction activities for the project, all construction work occurring within 60 feet of the find shall immediately stop and a qualified archaeologist must be notified immediately to assess the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find, the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work as outlined in the Cultural Resources Monitoring Plan (MM-CUL-1) may be warranted. If resources are determined to be tribal cultural resources in nature, MM-TCR-2 shall be implemented. Within 60 days following completion of ground disturbance and submitted to the City for review. This report shall document compliance with approved mitigation, document the monitoring efforts, and include an appendix with daily monitoring logs. The final report shall be submitted to the South Central Coastal Information Center and interested consulting tribes.				
Geology and Soils				
MM-GEO-1: Discovery of Paleontological Resources. In the event that paleontological resources (i.e., fossil remains) are exposed during construction activities for the project, all construction work occurring within 50 feet of the find shall immediately stop until a qualitied paleontologist, as defined by the Society of Vertebrate Paleontology's guidelines, can assess the nature and importance of the find. Depending on the significance of the find, the qualified paleontologist may record the find and allow work to continue or may recommend salvage and recovery	During construction	Project applicant	City of Highland Planning Division	

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
of the resource. All recommendations shall be made in accordance with the Society of Vertebrate Paleontology's guidelines and shall be subject to review and approval by the City of Highland. Work in the area of the find may only resume upon approval of a qualified paleontologist				
Hazards and Hazardous Materials				
MM-HAZ-1: Prior to the issuance of building permits, the project applicant shall retain a qualified contractor to remove and dispose of contaminated soil in the vicinity of the automotive repair area at 7824 Victoria Avenue and in the vicinity of the concrete pad at 26462 6th Street, as identified in the December 2020 *Phase I Environmental Site Assessment and Limited Phase II Soil Investigation 7809 Grape Street, 7834 Victoria Avenue, 26432 6th Street, and Assessor's Parcel Numbers: 1192-281-09 and 1192-281-14, Highland, California 92346*, prepared by Hazard Management Consulting, or any updates to that report. The removal, transport, and disposal of refuse shall be done in accordance with all applicable local, state, and federal guidelines related to hazardous materials handling. A summary of the soil removal and disposal activities shall be provided to the City of Highland within a reasonable timeframe following completion of these activities.	Prior to issuance of building permits	Project applicant	City of Highland Building & Safety Division	
Tribal Cultural Resources				
MM-TCR-1: Retain a Native American Monitor Prior to Commencement of Ground Disturbing Activities The project applicant shall make a good faith effort to retain a Native American monitor prior to the start of any project-related ground-disturbing activities. The Native American monitor shall be notified by the project applicant of the time and location of the Worker Environmental	Prior to construction	Project applicant and their construction contractor	City of Highland Planning Division	

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
Awareness Program (WEAP) training no more than 72 hours prior to its scheduled occurrence.				

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6th Street and Victoria Avenue Warehouse Project
Initial Study/Mitigated Negative Declaration

Prepared for:

City of Highland
27215 Base Line
Highland, California 92346
Contact: Kim Stater, Assistant Community Development Director

Prepared by:

DUDEK
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NOVEMBER 2021

Printed on 30% post-consumer recycled material.

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
ACM	asbestos-containing materials
ACOE	U.S Army Corps of Engineers
ADA	Americans Disability Act
AERMOD	American Meteorological Society/Environmental Protection Agency Regulatory Model
APN	assessor's parcel numbers
AQMP	Air Quality Management Plan
ARD	aquatic resource delineation
BenMAP	EPA Benefits Mapping and Analysis Program
BMP	best management practice
BP	business park
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CMP	corrugated metal pipe
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CRHR	California Register of Historic Resources
CY	cubic yards
dB	decibels
dBA	A-weighted decibel
DPM	diesel particulate matter
EPA	U.S. Environmental Protection Agency
EV	electric vehicle
EVWD	East Valley Water District
FICON	Federal Interagency Committee on Noise
FTA	Federal Transit Administration
GHG	greenhouse gas
HIA	health impact assessments
HRA	health risk assessment
HVAC	heating, ventilation, and air conditioning
I-	Interstate
IS	initial study
ITE	Institute of Transportation Engineers
LOS	level of service
LST	localized significance threshold
MND	mitigated negative declaration
MT	metric tons

Acronym/Abbreviation	Definition
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NPDES	National Pollution Discharge Elimination System
NRHP	National Register of Historic Places
OEHHA	Office of Environmental Health Hazard Assessment
OSHA	Occupational Safety and Health Administration
PCE	passenger car equivalent
PM	particulate matter
REL	reference exposure level
ROW	right-of-way
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SBCOG	San Bernardino Council of Governments
SBIA	San Bernardino International Airport and Trade Center
SBSD	San Bernardino County Sheriff's Department
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCS	Sustainable Communities Strategy
SJVAPCD	San Joaquin Valley Air Pollution Control District
SLF	Sacred Lands File
SMBMI	San Manuel Band of Mission Indians
SR	State Route
SWPPP	Stormwater Pollution Prevention Program
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TCR	tribal cultural resource
TIA	traffic impact analysis
USGS	U.S. Geological Survey
VMT	vehicle miles traveled
VOC	volatile organic compounds
WQMP	Water Quality Management Plan
WRP	Water Reclamation Plant

1 Introduction

1.1 Project Overview

The City of Highland (City) received an application from Patriot Development Partners (project applicant) requesting the following approvals for development of the 6th Street and Victoria Avenue Warehouse Project (project) located at the northwest corner of 6th Street and Victoria Avenue in Highland, California:

- Conditional Use Permit (CUP 21-007)
- Design Review (DRA 21-005)
- Variance (No. VAR 21-001)
- Parking Reduction
- Tentataive Parcel Map (TPM 21-002)

The project includes design review for the construction of an approximately 305,617-square-foot, one-story industrial/warehouse facility on an approximately 12.29-acre (gross) property located in the southern part of the City. The project site is composed of five parcels (Assessor's Parcel Numbers [APNs] 1192-281-09, 1192-281-10, 1192-281-11, 1192-281-12, 1192-281-13, and 1192-281-14). In addition to the industrial/warehouse building, the project would include a landscaping area, passenger vehicle parking spaces, trailer parking spaces, and tractor-trailer loading docks.

1.2 California Environmental Quality Act Compliance

The City is the lead California Environmental Quality Act (CEQA) agency responsible for the review and approval of the proposed project. Based on the findings of the Initial Study (IS), the City has made the determination that a Mitigated Negative Declaration (MND) is the appropriate environmental document to be prepared in compliance with CEQA (California Public Resources Code, Section 21000 et seq.). As stated in CEQA Section 21064, an MND may be prepared for a project subject to CEQA when an IS has identified no potentially significant effects on the environment.

This draft Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared by the City as lead agency and is in conformance with Section 15070(a) of the CEQA Guidelines (14 CCR 15000 et seq.). The purpose of the MND and the IS Checklist is to determine any potentially significant impacts associated with the proposed project and to incorporate mitigation measures into the project design, as necessary, to reduce or eliminate the significant or potentially significant effects of the project.

1.3 Public Review Process

In accordance with CEQA, a good faith effort has been made during the preparation of this IS/MND to contact affected agencies, organizations, and persons who may have an interest in this project.

In reviewing the IS/MND, affected public agencies and the interested public should focus on the sufficiency of the document in identifying and analyzing the project's possible impacts on the environment. The Draft IS/MND and related documents are available for review on City's website (https://www.cityofhighland.org/200/Documents-Forms).

Comments on the IS/MND may be made in writing before the end of the public review period. Following the close of the public comment period, the City will consider this IS/MND and comments thereto in determining whether to approve the proposed project.

Written comments on the IS/MND should be sent to the following address by December 9, 2021.

City of Highland
Planning Department
27215 Base Line
Highland, California 92346
Contact: Kim Stater
Email: kstater@cityofhighland.org

1.4 Initial Study Checklist

Dudek, under the City's guidance, prepared the project's Environmental Checklist (i.e., IS) per CEQA Guidelines Sections 15063–15065. The CEQA Guidelines include a suggested checklist to indicate whether a project would have an adverse impact on the environment. The checklist is found in Section 3 of this document. Following the Environmental Checklist, Sections 3.1 through 3.21 include an explanation and discussion of each significance determination make in the checklist for the project.

For this IS/MND, the following four possible responses to each individual environmental issue area are included in the checklist:

1. Potentially Significant Impact
2. Less-than-Significant Impact with Mitigation Incorporated
3. Less-than-Significant Impact
4. No Impact

The checklist and accompanying explanation of checklist responses provide the information and analysis necessary to assess relative environmental impacts of the project. In doing so, the City will determine the extent of additional environmental review, if any, for the project.

2 Project Description

2.1 Project Location

The project site is located in the southwestern area of the City in western San Bernardino County. The City is bounded by the San Bernardino National Forest to the north and to the east, the City of Redlands to the south, and the City of San Bernardino to the west. The project site is located at the northwestern corner of 6th Street and Victoria Avenue, north of 6th Street, east of Grape Street, south of Cypress Street, and west of Victoria Avenue (Figure 1, Project Location Map).

The project site is composed of six parcels (APNs 1192-281-09, 1192-281-10, 1192-281-11, 1192-281-12, 1192-281-13, and 1192-281-14) (Figure 2, Aerial Overview). Regional access to the project area is provided by Interstate (I-) 10 to the south, I-215 to the west, and State Route (SR) 210 to the east. The site is bounded to the north and west by scattered low- density residential land uses, to the east by business park uses, and to the south by the City boundary, with the City of San Bernardino and the San Bernardino Airport located beyond the City limits.

2.2 Environmental Setting

City of Highland

The City of Highland is a mid-sized California city with approximately 55,000 residents and 18 square miles of territory. Within the City, the pattern of land use transitions from predominantly single and multi-family residential and industrial near the San Bernardino International Airport to predominately single-family residential, commercial, service and civic center uses to the north. The eastern areas of the City are mostly made up of planned development areas with various residential types, parks and open space .

Project Site

The approximately 12.3-acre rectangular-shaped project site is located on the northwestern corner of 6th Street and Victoria Avenue. Of the six parcels that comprise the project site, three parcels are developed with residential uses and the remaining three parcels are undeveloped. Vegetation on the undeveloped parcels is largely composed of ruderal (i.e., weedy) species and grasses and is regularly subject to weed abatement and grazing by horses. A portion of the undeveloped parcels is used for equine activities (i.e., horseback riding and grazing). Barns, horse stalls, and a horse corral are located throughout the site. A drainage ditch is located on the southwestern portion of the site. The ditch receives flows from a City storm drain within Victoria Avenue, as well as runoff from Victoria Avenue, before discharging flows into a 48-inch corrugated metal pipe within 6th Street. Figures 3A-C depict the existing conditions on the project site.

The project site is relatively flat and generally slopes from east to west having approximately 8 feet of fall. The maximum site elevation, located on the western side of the site, is approximately 1,148± feet above mean sea level, while the minimum site elevation, located at the southwest corner, is 1140± feet above mean sea level. Soils on site consist of both fill soils and native soils. Fill soils are present approximately 12 to 18 inches deep and classify as silty sand with some gravel, small cobbles, and minor debris. Native soils on site classify as slightly silty to silty sand with some gravel with occasional cobbles.

The City's General Plan Land Use Map designates the project site as Business Park, and the project site is zoned as Business Park within the Airport Influence Zone (Figure 4, General Plan Land Use and Figure 5, Zoning).

Surrounding Land Uses

The project site is located within a developed part of the City and is surrounded by a mix of urbanized land uses. Specific land uses in the immediate project area are depicted in Table 1, Surrounding Land Uses.

Table 1. Surrounding Land Uses

Direction	Existing Use	General Plan	Zoning Designation
North	Industrial uses and single-family homes	Business Park	Business Park
East	Vacant parcel	Business Park	Business Park
South	6th Street, undeveloped land, and the San Bernardino International Airport	City of San Bernardino (High Density Residential)[1]	City of San Bernardino (R-3, Multi-Family Residential) [1]
West	Grape Street, industrial and residential uses	Low Density Residential	R-1 Single Family Residential

Note: See Figure 4, General Plan Land Use and Figure 5, Zoning.

1 This area would be within the Airport Gateway Specific Plan, which is in the planning stages and would primarily include distribution uses.

The area south of the project site is currently designated for high density residential uses; however, the area is within the boundary of the proposed Airport Gateway Specific Plan. The Airport Gateway Specific Plan is a public-private partnership project proposed by the Inland Valley Development Agency, a Joint Powers Authority comprised of members from the County of San Bernardino, the City of Loma Linda, the City of San Bernardino, and the City of Colton. The Airport Gateway Specific Plan encompasses 670 acres, inclusive of parcels in the City of Highland and the City of San Bernardino, that would be designated for a mix of industrial uses. The Airport Gateway Specific Plan would be bound by 6th Street to the north, 3rd Street and the San Bernardino International Airport to the south, SR-210 to the east, and Tippecanoe Avenue on the west. The proposed Airport Gateway Specific Plan would border the project site to the south, with industrial uses replacing the existing residential uses (Figure 6, Airport Gateway Specific Plan). This project is currently undergoing environmental review.

2.3 Project Characteristics

The project would include demolition of the three existing residential structures and construction of an approximately 305,617-square-foot[1] (gross area, inclusive of mezzanine/office spaces), one-story warehouse building on an approximately 12.3-acre site (gross area). The warehouse building would be composed of approximately 295,617 square feet of warehouse space and 10,000 square feet of mezzanine/office space (Figure 7, Site Plan, Figure 8, Conceptual Elevations, and Figures 9A-B, Conceptual Rendering). The warehouse building would have a maximum height of 45 feet when measured from grade. Given that the City's Municipal Code allows

1 A previous version of the draft project description included a project involving 307,445-square feet of development (an increase of 1,812 square feet over the proposed project). Because the technical analyses and modeling had already been completed at the time that this project change was made, the technical analysis within this environmental documentation analyzes the development of the original, 307,445 square foot project. Given the nominal change in square-footage, no updates to the project's technical analysis were conducted, as any changes would have a less than appreciable effect on outputs. Moreover, given that the change constitutes a decrease in square footage, usage of the original project square footage results in a conservative analysis (i.e., a smaller project would result in a less impactful project).

for a maximum height of 35 feet in the Business Park zone, a minor variance (Variance No.VAR 21-001) is being requested to accommodate the project's height. Internally, the project would have a clear height of 36 feet and would not contain any cold storage space.

Operational Characteristics

The project would support a variety of activities associated with the industrial/warehouse building, including the ingressing and egressing of passenger vehicles and trucks, the loading and unloading of trucks with designated truck courts/loading areas, and the internal and external movement of materials around the project site via forklifts, pallet jacks, yard hostlers, and similar equipment. In addition, the office space would support general internal office activities related to the industrial/warehouse uses.

On- and Off-Site Improvements

The project would also include improvements along the project's street frontage, including landscaping, fencing, and street and sidewalk improvements. A variety of trees, shrubs, and groundcovers would be planted within the project frontage's landscape setback area, within the landscape areas found around the warehouse building, and throughout the project site (Figure 10, Conceptual Landscaping Plan).

Figure 11, Proposed Physical Disturbances, depicts the maximum area that could potentially be disturbed as part of the project for these on- and off-site improvements, including utility connections, as detailed further herein.

Site Access and Parking

Access to the project site would be provided by four driveways: two driveways on the western portion of the site on Grape Street, and two driveways on the eastern portion of the site on Victoria Avenue. The two northern driveways would serve passenger vehicles and trucks and would be full access (i.e., no restrictions on turning movements). The two southern driveways would serve passenger vehicles. The southern driveway along Grape would be full access while the southern driveway on Victoria Avenue would be right-in/right-out.

The project would include a total of 129 passenger parking stalls and 30 high dock door parking stalls. A summary of passenger vehicle parking is provided in Table 2.

Table 2. Summary of Passenger Parking Stalls

Passenger Parking Stall Type	Number of Stalls
Standard	111
Van ADA	1
ADA	4
EV Van ADA	1
EV ADA	1
EV	5
Clean Air	6
Total Passenger Parking Stalls	129
Trailer Provided	52
Passenger Parking Stalls Required	338

Note: ADA = Americans Disability Act, EV = Electric Vehicle.

Utility Improvements

The project site is currently served by domestic water, sanitary sewer, electrical, natural gas, and telecommunication service. The project would connect to the existing facilities located on and in the immediate vicinity of the project site, as detailed in following sections and depicted in Figure 12, Conceptual Utilities Plan.

Domestic Water

Domestic water would be provided to the project site by the East Valley Water District (EVWD). The EVWD provides domestic water for the City and for portions of both the City and County of San Bernardino. Water service is provided for residential, commercial, industrial, governmental, and landscaping purposes (City of Highland 2006). A new 2-inch water line would be installed on the eastern side of the project sit to connect to the existing 6-inch water line within the public right-of-way (ROW) along Victoria Avenue.

Sanitary Sewer

Highland's sewer system is maintained by the EVWD, which has joint powers with the City of San Bernardino to accept all sewage generated within the EVWD's boundaries. The sewage from Highland is treated at the San Bernardino Water Reclamation Plant (WRP), operated by the San Bernardino City Municipal Water District (City of Highland 2006). Two new 6-inch sewer lines would connect to the existing 21-inch sewer line within Victoria Avenue and the existing 8-inch sewer line within Grape Street. Future treatment will take place at the EVWD Sterling Natural Resources Plant, currently under construction at the intersection of Del Rosa Drive, between 5th and 6th Streets.

Natural Gas, Electrical Service, and Telecommunications

The Southern California Gas Company would provide natural gas service to the project site. The project would connect to either an 8-inch gas line within 6th Street or a 3-inch gas line within Victoria Avenue. an existing 4-inch-diameter underground gas line within Woodruff Avenue.

Southern California Edison would provide electric service. The project would connect to existing electrical lines within Grape Street or Victoria Avenue. Existing overhead lines would be undergrounded along the project site's frontage. Telecommunication services are provided by AT&T. The project would connect to these existing facilities and would involve the undergrounding of existing overhead lines along the project site's frontage.

Storm Drainage

The project site is not currently served by storm drainage infrastructure. Under the existing conditions, the site is mostly composed of pervious surfaces with scattered weeds, native grasses, and exposed dirt surfaces (with the exception of existing residences in the northwest corner, east-central, and south-central areas of the site). The topography of the project site slopes east to west with about 8 feet of fall. Existing runoff sheet flows westerly to Grape Street, continues south to 6th Street, and ultimately discharges to the City Creek Channel, Santa Ana River, and finally to the Prado Basin. Additionally, the project site contains a drainage ditch within the southeastern portion of the site that receives stormwater from a City storm drain line to the north within Victoria Avenue, as well as runoff from Victoria Avenue. Flows within the drainage ditch then flow south to an existing 48-inch corrugated metal pipe within 6th Street, which is ultimately connected to the City Creek Channel and Santa Ana River.

The project would involve the construction of a new engineered storm drain system to collect and treat on-site and off-site stormwater runoff, as depicted in Figure 13, Conceptual Stormwater Plan. On-site stormwater will be

collected via a series of roof drains, curbs, and gutters, and catch basins before being conveyed to an on-site underground infiltration basin located in the western portion of the site. Prior to entering the infiltration basins, stormwater would be pretreated via a continuous deflection separation system, which separates and traps debris, sediment, oil, and grease from stormwater runoff. The infiltration basins would be designed to allow for stormwater flows to infiltrate into the soils. The infiltration basin would be sized to capture and infiltrate flows for a 100-year design storm, consistent with the San Bernardino County Hydraulics Manual. During an extreme storm event greater than a 100-year storm, flows would be discharged through a proposed 4-foot-wide parkway culvert on the corner of 6th Street and Grape Street that would serve as an emergency spillway[2].

The project would also involve the removal of the existing drainage ditch along Victoria Avenue and its replacement with an 18-inch and 42-inch storm drain that will connect to the existing 48-inch corrugated metal pipe within 6th Street. The new storm drain would still be connected to the existing City storm drain line and a parkway catch basin would be installed along Victoria Avenue so that runoff within Victoria Avenue would still be captured. Two 4-foot by 4-foot bypass curb inlets would be installed to filter off-site debris and trash from runoff on Victoria Avenue.

2.4 Project Construction and Phasing

The project applicant intends to commence construction on or around February 1, 2022. It is anticipated that construction would take approximately 9 months, ending in October 2022. Table 3 provides a tentative project construction schedule, as used in air quality and greenhouse gas (GHG) emissions impact analysis (refer to Section 3.3 Air Quality, and Section 3.8, Greenhouse Gas Emissions, of this IS/MND; also see Appendix A-1, Air Quality, Greenhouse Gas Emission, and Energy Modeling Inputs and Outputs).

Table 3. Anticipated Project Construction Schedule

Construction Phase	Duration	Phase Start Date	Phase End Date
Demolition	1 month	February 1, 2022	February 28, 2022
Site Preparation	1 month	March 1, 2022	March 14, 2022
Grading	1 month	March 15, 2022	April 25, 2022
Building Construction	4 months	April 26, 2022	August 19, 2022
Paving	1 month	August 20, 2022	September 16, 2022
Architectural Coating	1 month	September 17, 2022	October 13, 2022

2.5 Project Approvals

The actions and/or approvals that the City needs to consider for the proposed project include, but are not limited to, the following. This list is preliminary, and may not be comprehensive:

Lead Agency Approvals

- Conditional Use Permit
- Design Review

[2] As discussed in further detail in Section 3.10, Hydrology and Water Quality, flows that would be discharged under emergency conditions would be less than what would normally be discharged under the existing conditions.

- Tentative Parcel Map
- Variance
- Parking Reduction
- Tree Removal Permit

Subsequent non-discretionary approvals (which would require separate processing through the City) would include, but may not be limited to, a demolition permit, grading permit, building permits, and occupancy permits.

3 Initial Study Checklist

1. **Project title:**

   6th Street and Victoria Avenue Warehouse Project

2. **Lead agency name and address:**

   City of Highland, Planning Department
   27215 Base Line
   Highland, California 92346

3. **Contact person and phone number:**

   Kim Stater, Assistant Community Development Director
   27215 Base Line
   Highland, California 92346
   909.864.6861 Ext. 259
   909.862.3180 (Fax)
   kstater@cityofhighland.org

4. **Project location:**

   The project site is located at a 12.3-acre property at the northwestern corner of 6th Street and Victoria Avenue in the City of Highland, California (Figure 1). The project site is composed of six parcels (APNs 1192-281-09, 1192-281-10, 1192-281-11, 1192-281-12, 1192-281-13, and 1192-281-14). The project site is north of 6th Street, east of Grape Street, south of Cypress Street, and west of Victoria Avenue.

5. **Project sponsor's name and address:**

   Patriot Development Partners
   12126 West Sunset Boulevard
   Los Angeles, California 90094

6. **General plan designation:**

   Business Park

7. **Zoning:**

   Business Park

8. **Description of project:**

   The project would include demolition of the three existing residential structures and construction of an approximately 305,617-square-foot (gross area, inclusive of mezzanine/office spaces), one-story warehouse building on an approximately 12.3-acre site (gross area). The warehouse building would be composed of approximately 295,617 square feet of warehouse space and 10,000 square feet of mezzanine/office space (Figure 7, Site Plan, Figure 8, Conceptual Elevations, and Figure 9A-B, Conceptual Rendering).

9. **Surrounding land uses and setting:**

The project site is located within a developed part of the City and is surrounded by a mix of urbanized land uses. Specific land uses in the immediate project area include the following:

- **North:** Multi and single-family homes and mixed uses
- **East:** Victoria Avenue, vacant parcels, industrial, religious and institutional uses
- **South:** 6th Street, the San Bernardino International Airport and the City of San Bernardino
- **West:** Grape Street, residential and mixed uses

10. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):**

No outside public agency approvals are required.

11. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

Please refer to Section 3.5, Cultural Resources, and 3.18, Tribal Cultural Resources, of this IS/MND.

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

Determination

On the basis of this initial evaluation:

☐ 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 ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature Date

Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
   a. Earlier Analysis Used. Identify and state where they are available for review.
   b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c. Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
   d. The significance criteria or threshold, if any, used to evaluate each question; and
   e. The mitigation measure identified, if any, to reduce the impact to less than significance

3.1 Aesthetics

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. **AESTHETICS** – Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a) Would the project have a substantial adverse effect on a scenic vista?

No Impact. Scenic vistas and other important visual resources are typically associated with natural landforms such as mountains, foothills, ridgelines, and coastlines. The project site is located within in an area with generally flat terrain near the San Bernardino International Airport. Major scenic vistas that are visible from the project site are the San Bernardino and San Gabriel Mountain ranges. They are located approximately 4 miles northeast and 25 miles northwest of the project site, respectively. The City of Highland's General Plan aims to preserve the views of the San Bernardino Mountains and stretches of open space along City Creek and the Santa Ana River (City of Highland 2006). The project site is located 1.8 miles away from the nearest stretches of open space along City Creek and the Santa Ana River. Based on these distances, as well as the presence of existing intervening natural topographical variations and human-made urban features, the project site is not located within the direct viewshed of these scenic vistas. Overall, the project site is located well outside the viewshed of any scenic vistas or other important visual resources. Therefore, no impacts associated with scenic vistas would occur.

b) Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. Scenic highways and routes are a unique component of the circulation system, as they traverse areas of unusual scenic or aesthetic value. The closest officially designated State Scenic Highway is

California SR 38, located 22 miles east of the project site (Caltrans 2018). Based on this distance and intervening natural topography and human-made development, the project site is not located within the viewshed of this officially designated state scenic highway. Therefore, no impacts associated with state scenic highways would occur.

c) ***In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?***

Less-than-Significant Impact. Visual character describes the aesthetic setting of a project area. The project is located within an urbanized area of the City and is surrounded by similar light industrial/business park land uses. Section 20171 of the California Public Resources Code defines an "urbanized area" as "an incorporated city that meets either of the following criteria: (1) Has a population of at least 100,000 persons, or (2) Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons." As of January 1, 2021, the California Department of Finance estimated the population of Highland to be 55,060 persons (DOF 2021). However, because the City of Highland is bordered by the City of San Bernardino, which has a population that exceeds 100,000 persons, regarding the determination of significance under this threshold, the project would be considered to result in a significant adverse impact if the project design would conflict with applicable zoning and other regulations governing scenic quality. The proposed project would be consistent with the designated business park zoning per the City's Zoning Map.

To ensure that both current and future development within the City is designed and constructed to conform to existing visual character and quality of the surrounding built environment, the City's Municipal Code includes design standards related to building size, height, and setbacks, as well as landscaping, signage, and other visual considerations. The project is consistent with all applicable regulations outlined in the City's Municipal Code related to senic quality with the exception of Section 16.24.040, which states that building heights are not to exceed 35 feet within the Business Park zone. The proposed warehouse building would have a maximum height of 45 feet. Given that the City's Municipal Code allows for a maximum height of 35 feet in the Business Park Zone, a minor variance (Variance No. VAR 21-001) is being requested to accommodate the project's height. This request for additional height is consistent with other industrial uses in the vicinity. With approval of the minor variance, the project would not conflict with the City's Municipal Code.

The project would be required to apply for a design review by the City's planning commission. This design review is intended to ensure that the proposed project would not interfere with existing or future development within the City, and to ensure the project is consistent with the applicable elements of the general plan. Views of utilitarian project components, such as loading areas and mechanical equipment, would be screened from public view to the maximum extent practicable through the project's site plan design. Parkway and setback landscape areas along the public ROW would soften views of the project site and enhance the visual quality of the project.

These project components, as well as the City's review of the project's design, would ensure that the project would not degrade the existing visual character and quality of the area. Therefore, impacts would be less than significant.

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Short-Term Construction Impacts

No Impact. In accordance with the City's Municipal Code Section 8.50.050, Controlled Hours of Operation, construction hours are limited to between the hours of 7:00 a.m. and 10:00 p.m. However, the project's proximity to sensitive receptors would limit construction from 7:00 a.m. to 6:00 p.m. (see Section 3.13, Noise, for more details). As such, project construction would be limited to daytime hours and nighttime lighting would not be required until the project is operational. Therefore, no short-term construction impacts associated with light and glare would occur.

Long-Term Operational Impacts

Less-than-Significant Impact. Consistent with Section 16.40.160 of the City's Development Code, all lighting used on the project site is required to be directed and/or shielded to prevent the light from adversely affecting adjacent parcels, and no structures or features that create adverse glare effects are permitted. Thus, all exterior lighting would be shielded/hooded to prevent light trespass onto nearby properties. A Photometrics Plan, prepared by a certified engineer, must be approved by the Planning Commission in conjunction with the Conditional Use Permit. Additionally, the project would use a variety of non-reflective materials, and although some new reflective improvements (i.e., windows and building front treatments) would be introduced onto the project site, the project as a whole would not be considered a source of glare in the project area. Therefore, long-term impacts associated with light and glare would be less than significant.

3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California 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:				
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?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

a) ***Would the project 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?***

No Impact. The project site currently consists of developed and vacant land and is not used for agricultural purposes. The General Plan designates the land use at the site as Business Park and the City's Zoning Map identifies the site as Business Park (City of Highland 2006; City of Highland 2012). According to the California Department of Conservation Important Farmland Finder (CDOC 2016), the project site is identified as "Urban and Built-Up Land". The project site does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (collectively, "Important Farmland"). The project would not occur within any farmland locations and would not result in the conversion of Prime or Unique Farmland or Farmland of Statewide Importance. Therefore, no impacts associated with the conversion of Important Farmland would occur.

b) ***Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?***

No Impact. Refer to Section 3.2(a).

c) ***Would the project 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))?***

No Impact. Refer to Section 3.2(a). The project site is zoned as Business Park and is located within a developed area. There are no areas zoned for forest land within the vicinity of the project site. Therefore, no impacts associated with forest land would occur.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. Refer to Section 3.2(c). The proposed project would not involve the conversion of forest land to non-forest use. Therefore, no impact with forest land would occur.

e) Would the project 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?

No Impact. Refer to Section 3.2(a). The project site is zoned as Business Park and is located within a developed area. Further, no off-site improvement associated with the project would result in changes to other properties designated as Farmland or forest land. There are no areas zoned for agricultural use or identified as forest land within the vicinity of the project site. Therefore, no impacts associated with forest land would occur.

3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. 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:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less-than-Significant Impact. The project site is located within the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, San Bernardino Counties, and all of Orange County, and is within the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD).

SCAQMD administers SCAB's Air Quality Management Plan (AQMP), which is a comprehensive document outlining an air pollution control program for attaining the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The most recently adopted AQMP for SCAB is the

2016 AQMP (SCAQMD 2017).[3] The 2016 AQMP focuses on available, proven, and cost-effective alternatives to traditional air quality strategies while seeking to achieve multiple goals in partnership with other entities seeking to promote reductions in GHGs and toxic risk, as well as efficiencies in energy use, transportation, and goods movement (SCAQMD 2017).

The purpose of a consistency finding with regard to the AQMP is to determine if a project is consistent with the assumptions and objectives of the 2016 AQMP and if it would interfere with the region's ability to comply with federal and state air quality standards. SCAQMD has established criteria for determining consistency with the currently applicable AQMP in Chapter 12, Sections 12.2 and 12.3, of the SCAQMD CEQA Air Quality Handbook. These criteria are as follows (SCAQMD 1993):

Consistency Criterion No. 1: Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP.

Consistency Criterion No. 2: Whether the project would exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

To address the first criterion, project-generated criteria air pollutant emissions have been estimated and analyzed for significance and are addressed under Section 3.3(b). Detailed results of this analysis are included in Appendix A-1. As presented in Section 3.3(b), the project would not generate construction or operational criteria air pollutant emissions that exceed the SCAQMD's thresholds, and the project would therefore be consistent with Criterion No. 1.

The second criterion regarding the potential of the project to exceed the assumptions in the AQMP or increments based on the year of project buildout and phase is primarily assessed by determining consistency between the project's land use designations and its potential to generate population growth. In general, projects are considered consistent with, and not in conflict with or obstructing implementation of, the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP (SCAQMD 1993). The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, and employment by industry) developed by the Southern California Association of Governments (SCAG) for its 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG 2016). SCAQMD uses this document, which is based on general plans for cities and counties in the SCAB, to develop the AQMP emissions inventory (SCAQMD 2017).[4] The SCAG RTP/SCS and associated Regional Growth Forecast are generally consistent with the local plans; therefore, the 2016 AQMP is generally consistent with local government plans.

The City's Zoning Map designates the project site as Business Park (BP). According to Section 16.24.020 (A), the primary purpose of the BP District is to provide appropriate regulations and suitable locations for

3 The SCAQMD has initiated the development of the 2022 AQMP to address the attainment of the 2015 8-hour ozone standard (70 parts per billion) for the SCAB and the Coachella Valley. Preliminary rule development for the 2022 AQMP is expected to begin in July 2021 including control measures developed through Residential and Commercial Buildings and Mobile Source Working Groups.

4 Information necessary to produce the emissions inventory for SCAB is obtained from the SCAQMD and other governmental agencies, including the California Air Resources Board (CARB), California Department of Transportation, and SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socioeconomic projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. SCAG incorporates these data into its Travel Demand Model for estimating/projecting vehicle miles traveled and driving speeds. SCAG's socioeconomic and transportation activities projections in their 2016–2040 RTP/SCS are integrated in the 2016 AQMP (SCAQMD 2017).

light industrial, research and development, and office-based firms seeking pleasant and attractive working environments, and for business support services and commercial uses requiring large parcels (City of Highland 2021). The Municipal Code identifies Warehousing and Wholesaling as permitted, subject to a conditional use permit application (City of Highland 2021). Therefore, the project would be consistent with the existing zoning of the project site and does not propose a change in land use designation. As such, since the proposed project is not anticipated to result in residential population growth or generate an increase in employment that would conflict with existing employment-population projections, it would not conflict with or exceed the assumptions in the 2016 AQMP. Accordingly, the project is consistent with the SCAG RTP/SCS forecasts used in development of the SCAQMD AQMP.

In summary, based on the considerations presented for the two criteria, impacts relating to the project's potential to conflict with or obstruct implementation of the applicable AQMP would be less than significant.

b) Would the project 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?

Less-than-Significant Impact. Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are used to determine whether a project's individual emissions would have a cumulatively considerable contribution to air quality. If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant (SCAQMD 2003a).

A quantitative analysis was conducted to determine whether the project might result in emissions of criteria air pollutants that may cause exceedances of the NAAQS or CAAQS or cumulatively contribute to existing nonattainment of ambient air quality standards. Criteria air pollutants include ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide, particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM_{10}), particulate matter with an aerodynamic diameter less than or equal to 2.5 microns ($PM_{2.5}$), and lead. Pollutants that are evaluated herein include volatile organic compounds (VOCs) and oxides of nitrogen (NO_x), which are important because they are precursors to O_3, as well as CO, sulfur oxides (SO_x), PM_{10}, and $PM_{2.5}$.

Regarding NAAQS and CAAQS attainment status,[5] the SCAB is designated as a nonattainment area for federal and state O_3 and $PM_{2.5}$ standards (CARB 2019; EPA 2020). The SCAB is also designated as a nonattainment area for state PM_{10} standards; however, it is designated as an attainment area for federal PM_{10} standards. The SCAB is designated as an attainment area for federal and state CO and NO_2 standards, as well as for state sulfur dioxide standards. Although the SCAB has been designated as nonattainment for the federal rolling 3-month average lead standard, it is designated attainment for the state lead standard.[6]

5 An area is designated as in attainment when it is in compliance with the NAAQS and/or the CAAQS. These standards for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or the public welfare are set by the EPA and CARB, respectively. Attainment = meets the standards; attainment/maintenance = achieves the standards after a nonattainment designation; nonattainment = does not meet the standards.

6 Re-designation of the lead NAAQS designation to attainment for the Los Angeles County portion of the SCAB is expected based on current monitoring data. The phase-out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

The project would result in emissions of criteria air pollutants for which the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (EPA) have adopted ambient air quality standards (i.e., the NAAQS and CAAQS). Projects that emit these pollutants have the potential to cause, or contribute to, violations of these standards. The SCAQMD CEQA Air Quality Significance Thresholds, as revised in April 2019, set forth quantitative emission significance thresholds for criteria air pollutants, which, if exceeded, would indicate the potential for a project to contribute to violations of the NAAQS or CAAQS. Table 4 lists the revised SCAQMD Air Quality Significance Thresholds (SCAQMD 2019).

Table 4. South Coast Air Quality Management District Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds		
Pollutant	***Construction (Pounds per Day)***	***Operation (Pounds per Day)***
VOCs	75	55
NO_x	100	55
CO	550	550
SO_x	150	150
PM_{10}	150	150
$PM_{2.5}$	55	55
Lead[a]	3	3
TACs and Odor Thresholds		
TACs[b]	Maximum incremental cancer risk ≥10 in 1 million Cancer Burden >0.5 excess cancer cases (in areas ≥1 in 1 million) Chronic and acute hazard index ≥1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	

Source: SCAQMD 2019.
Notes: VOC = volatile organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; TAC = toxic air contaminant; SCAQMD = South Coast Air Quality Management District.
GHG emissions thresholds for industrial projects, as added in the March 2015 revision to the SCAQMD Air Quality Significance Thresholds, were not include included in this table as they are addressed within the GHG emissions analysis and not the air quality analysis.

[a] The phase-out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

[b] TACs include carcinogens and noncarcinogens.

The project would result in a cumulatively considerable net increase for O_3, which is a nonattainment pollutant, if the project's construction or operational emissions would exceed the SCAQMD VOC or NO_x thresholds shown in Table 4. These emission-based thresholds for O_3 precursors are intended to serve as a surrogate for an O_3 significance threshold (i.e., the potential for adverse O_3 impacts to occur) because O_3 itself is not emitted directly, and the effects of an individual project's emissions of O_3 precursors (i.e., VOCs and NO_x) on O_3 levels in ambient air cannot be determined through air quality models or other quantitative methods.

The California Emissions Estimator Model (CalEEMod) Version 2020.4.0 was used to estimate emissions from construction and operation of the project, with the exception of operational mobile source emissions.[7] The following discussion quantitatively evaluates project-generated construction and operational emissions and impacts that would result from implementation of the project.

[7] CalEEMod is a statewide computer model developed in cooperation with air districts throughout the state to quantify criteria air pollutant emissions associated with construction and operational activities from a variety of land use projects, including warehouses.

Construction Emissions

Construction of the project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (e.g., off-road construction equipment, soil disturbance, and VOC off-gassing from architectural coatings and asphalt pavement application) and off-site sources (e.g., vendor trucks, haul trucks, and worker vehicle trips). Specifically, entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM_{10} and $PM_{2.5}$ emissions. Internal combustion engines used by construction equipment, haul trucks, vendor trucks (i.e., delivery trucks), and worker vehicles would result in emissions of VOC, NO_x, CO, PM_{10}, and $PM_{2.5}$. Construction emissions can vary substantially from day to day depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions.

Emissions from the construction phase of the project were estimated using CalEEMod default values. For the purpose of conservatively estimating project emissions, construction was modeled beginning in February 2022 and concluding in October 2022,[8] lasting approximately 9 months. As a result of demolition, 964 cubic yards (CY) (1,158 tons) of debris were estimated to be exported from the site. The analysis contained herein is based on the following schedule assumptions (duration of phases is approximate):

- Demolition: 1 month (February 2022)
- Site preparation: 2 weeks (March 2022)
- Grading: 1 month (March 2022–April 2022)
- Building construction: 5 months (April 2022–August 2022)
- Paving: 1 month (August 2022–September 2022)
- Application of architectural coatings: 4 weeks (September 2022–October 2022)

Construction modeling assumptions for equipment and vehicles are provided in Table 5. Equipment mix and horsepower were based on CalEEMod default values, including equipment load factor. The site would require the import of approximately 188 CY of earthwork materials to balance the site during the grading phase. For the analysis, it was generally assumed that heavy-duty construction equipment would be operating at the site 5 days per week.

Table 5. Construction Scenario Assumptions

	One-Way Vehicle Trips			Equipment		
Construction Phase	***Average Daily Worker Trips***	***Average Daily Vendor Truck Trips***	***Total Haul Truck Trips***	***Equipment Type***	***Quantity***	***Usage Hours***
Demolition	16	0	114	Concrete/industrial saws	1	8
				Excavators	3	8
				Rubber-tired dozers	2	8
Site Preparation	18	0	0	Rubber-tired dozers	3	8

[8] The analysis assumes a construction start date of February 2022, which represents the earliest date construction would initiate. Assuming the earliest start date for construction represents the worst-case scenario for criteria air pollutant and GHG emissions, because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

Table 5. Construction Scenario Assumptions

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Total Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
				Tractors/loaders/ backhoes	4	8
Grading	20	0	20	Excavators	2	8
				Graders	1	8
				Rubber-tired dozers	1	8
				Scrapers	2	8
				Tractors/loaders/ backhoes	2	8
Building Construction	224	88	0	Cranes	1	7
				Forklifts	3	8
				Generator sets	1	8
				Tractors/loaders/ backhoes	3	7
				Welders	1	8
Paving	16	0	0	Pavers	2	8
				Paving equipment	2	8
				Rollers	2	8
Architectural Coating	46	0	0	Air compressors	1	6

Emissions generated during construction (and operation) of the project are subject to the rules and regulations of the SCAQMD. Rule 403, Fugitive Dust, requires the implementation of measures to control the emission of visible fugitive/nuisance dust, such as wetting soils that would be disturbed. It was assumed that the active sites would be watered at least three times daily per MM-AQ-1, resulting in an approximately 61% reduction of fugitive dust (CalEEMod default value), which exceeds the compliance requirements of SCAQMD standard dust control measures in Rule 403. The application of architectural coatings, such as exterior/interior paint and other finishes, and the application of asphalt pavement would also produce VOC emissions; however, the contractor is required to procure architectural coatings that comply with the requirements of SCAQMD's Rule 1113, Architectural Coatings.[9]

Table 6 shows the estimated maximum daily construction emissions associated with the construction phase of the project.

9 SCAQMD Rule 1113, Architectural Coatings, requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

Table 6. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds Per Day					
2022	26.66	39.00	29.89	0.07	9.48	5.48
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Appendix A-1.
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District.
The values shown are the maximum summer or winter daily emissions results from CalEEMod.
These estimates reflect control of fugitive dust required by SCAQMD Rule 403, and MM-AQ-1, specifically, watering of active site areas three times per day.

As shown in Table 6, daily construction emissions would not exceed the SCAQMD significance thresholds for VOC, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$ during project construction, and short-term construction impacts would be less than significant.

Operational Emissions

Emissions from the operational phase of the project were estimated using CalEEMod. Operational year 2023 was assumed consistent with the project's Traffic Impact Analysis (TIA) (Appendix H to this IS/MND).

Area Sources

CalEEMod was used to estimate operational emissions from area sources, including emissions from consumer product use, architectural coatings, and landscape maintenance equipment. Emissions associated with natural gas usage in space heating and water heating are calculated in the building energy use module of CalEEMod, as described in the following text.

Consumer products are chemically formulated products used by household and institutional consumers, including:

- Detergents
- Cleaning compound
- Polishes
- Floor finishes
- Cosmetics
- Personal care products
- Home, lawn, and garden products
- Disinfectants
- Sanitizers
- Aerosol paints
- Automotive specialty products

Other paint products, furniture coatings, or architectural coatings are not considered consumer products (CAPCOA 2017). Consumer product VOC emissions were estimated in CalEEMod based on the floor area of buildings and default factor of pounds of VOC per building square foot per day. The CalEEMod default values for consumer products were assumed.

VOC off-gassing emissions result from evaporation of solvents contained in surface coatings, such as in paints and primers used during building maintenance. CalEEMod calculates the VOC evaporative emissions from the application of surface coatings based on the VOC emission factor, the building square footage,

the assumed fraction of surface area, and the reapplication rate. The VOC emissions factor is based on the VOC content of the surface coatings, and SCAQMD's Rule 1113, Architectural Coatings, governs the VOC content for interior and exterior coatings. This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories (SCAQMD 2016). CalEEMod default values were assumed, including the surface area to be painted, the VOC content of architectural coatings, and the reapplication rate of 10% of area per year.

Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chainsaws, and hedge trimmers. The emissions associated with landscape equipment use were estimated based on CalEEMod default values for emission factors (grams per square foot of building space per day) and number of summer days (when landscape maintenance would generally be performed) and winter days.

Mobile Sources

The project would generate criteria pollutant emissions from mobile sources (vehicular traffic) as a result of the employee passenger vehicles (workers) and truck traffic associated with the operation of the warehouse.

Emissions from the mobile sources during operation of the project were estimated using a spreadsheet-based model and emission factors from the CARB EMFAC2021 and EPA AP-42 factors for paved road dust generation. The maximum daily trip rates, taken from the TIA prepared for the project (Appendix H), were 535 primary trips per day, which were assumed 7 days per week. The passenger vehicle trip lengths were assumed to be CalEEMod default trip length of 16.6 miles for commercial-work trips (i.e., trips made by someone who is employed by the warehouse land use) and assumed to be 100% of primary trips. The light-duty, medium-heavy-duty, and heavy-duty truck trip lengths were based on the SCAQMD recommendation of 40 miles and assumed to be 100% of primary trips.[10] Vehicle emissions occur during start-up, operation (running), and idling, as well as from evaporative losses when the engines are resting. The emissions factors for trucks and passenger vehicles were determined using EMFAC2021, which generates emissions factors, expressed in grams per mile, grams per trip, and grams per vehicle per day, for the fleet in a class of motor vehicles within a region for a particular study year. For this analysis, SCAQMD was selected for the San Bernardino region and calendar year 2023 was selected in EMFAC to represent the project operational start year.

A composite, or weighted-average, emissions factor was developed for project vehicle types if more than one vehicle category in EMFAC is anticipated to be representative of the project vehicle. The composite emission factors are weighted by vehicle miles traveled (VMT), population, or trips depending on the emissions process, which is the physical mechanism that results in the emissions of a pollutant. The vehicle mix was provided by the TIA (Appendix H), assuming 72.5% are passenger vehicles, 17.2% are 4+-axle trucks, 5.7% are 3-axle trucks, and 4.6% are 2-axle trucks. For passenger vehicles, the default fleet mix composite emission factor represents the weighted average emission rate for passenger vehicles, light-duty trucks, motorcycles, and a composite mix of gasoline-fueled, diesel-fueled, electric and plug-in hybrid. The 4+-axle trucks were assumed to be heavy-duty trucks, 3-axle trucks were assumed to be medium-

10 The average trip length for heavy-duty trucks were based on implementation of the Facility-Based Mobile Source Measures adopted in the SCAQMD's 2016 AQMP. SCAQMD's "Preliminary Warehouse Emission Calculations" assumed a heavy-heavy-duty truck trip length of 39.9 miles (SCAQMD 2018) and the default commercial-nonwork trip length for trucks in CalEEMod is 6.9 miles. Therefore, the conservatively assumed trip length of 40 miles is utilized for this analysis.

heavy-duty trucks, and 2-axle trucks were assumed to be light-heavy-duty trucks and all trucks were assumed to be a mix of gasoline-fueled, diesel-fueled, and electric.

Project truck idling would be limited to 5 minutes in accordance with CARB's adopted Airborne Toxic Control Measure; however, for modeling purposes, it was conservatively assumed that the trucks would idle for a total of 15 minutes: 5 minutes at the entrance, 5 minutes at the loading dock, and 5 minutes at the exit of the project site.

On May 7, 2021, the SCAQMD adopted the Warehouse Indirect Source Rule, Rule 2305. Rule 2305 was adopted to facilitate local and regional emission reductions associated with existing and new warehouses with an indoor warehouse floor space equal to or greater than 100,000 square feet within a single building and the mobile sources associated with these warehouses. Under Rule 2305, operators of applicable existing and new warehouses are subject to an annual Warehouse Actions and Investments to Reduce Emissions (WAIRE) Points Compliance Obligation (WPCO) intended to reduce regional and local emissions from warehouse indirect sources. Based on the approximately 305,617-square-foot warehouse building proposed for the project, Rule 2305 would be applicable to the project. However, Rule 2305 provides options for the operator to earn a certain number of points each year from emission-reducing activities or payment of a mitigation fee. Because there is possible payment of a mitigation fee, conservatively, no emission reductions from Rule 2305 are proposed for the air quality or GHG analysis.

Off-Road Equipment (Forklifts)

The exact operational off-road equipment is unknown at this time; however, in a good faith effort to include anticipated forklifts, forklifts were estimated based on the warehouse square footage and the SCAQMD study, as described below.

The SCAQMD published a summary of operational survey results from 34 operating high-cube warehouses (SCAQMD 2014). The SCAQMD survey reported an average of 0.12 forklifts/pallet jacks per 1,000 square feet of building area, which was applied to the project. Note that this estimate is for total forklifts and pallet jacks. Pallet jacks are small as they are primarily used to lift small loads in tight quarters (and are electric or manual); therefore, assuming all pieces of equipment are forklifts is conservative. For the project, a total of 35 forklifts were assumed. Of the total 35 forklifts, 15 of the forklifts were modeled as diesel powered with Tier 4 Interim compliant engines. The remaining 20 forklifts are assumed to be electric-operated. All 35 forklifts are assumed to operate 8 hours per day and 7 days per week at the project site. CalEEMod was used to estimate emissions from diesel powered forklifts while spreadsheet model was used to estimate the energy consumption and GHG emissions from the electric forklifts, see Appendix A-1.

Table 7 presents the maximum daily emissions associated with operation of the project in 2023 at buildout. The values shown are the maximum summer and winter daily emissions results from CalEEMod for area, energy, and off-road emissions sources, plus the estimated mobile source emissions using a spreadsheet model and EMFAC2021 and AP-42 emission factors. Complete details of the emissions calculations are provided in Appendix A-1.

Table 7. Estimated Maximum Daily Operation Criteria Air Pollutant Emissions

Emissions Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Area	6.97	<0.01	0.05	0.00	<0.01	<0.01
Energy	0.02	0.17	0.14	<0.01	0.01	0.01
Mobile	1.89	26.23	27.27	5.77	27.84	7.18
Off-road (Forklifts)	0.518	10.08	17.42	0.02	0.04	0.04
Total	**9.40**	**36.48**	**44.88**	**5.79**	**27.89**	**7.23**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	No	No	No	No	No	No

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District; <0.01 = reported value less than 0.01.
See Appendix A-1 for complete results.

As shown in Table 7, maximum daily operational emissions of VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ generated by the project would not exceed the SCAQMD's significance thresholds, and long-term operational impacts would be less than significant.

As previously discussed, the SCAB has been designated as a federal nonattainment area for O_3 and $PM_{2.5}$ and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. However, as indicated in Tables 6 and 7, project-generated construction and operational emissions would not exceed the SCAQMD emission-based significance thresholds for VOCs, NO_x, PM_{10}, or $PM_{2.5}$.

Cumulative localized impacts would potentially occur if a project were to occur concurrently with another off-site project. Schedules for potential future projects near the project area are currently unknown; therefore, potential impacts associated with two or more simultaneous projects would be considered speculative.[11] However, future projects would be subject to CEQA and would require air quality analysis and, where necessary, mitigation. Criteria air pollutant emissions associated with construction activity of future projects would be reduced through implementation of control measures required by the SCAQMD. Cumulative PM_{10} and $PM_{2.5}$ emissions would be reduced because all future projects would be subject to SCAQMD Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all sites in the SCAQMD. Additionally, cumulative VOC emissions would be reduced because all future projects would be subject VOC content of the surface coatings, SCAQMD's Rule 1113, Architectural Coatings, governs the VOC content for interior and exterior coatings.

Therefore, the project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants, and impacts would be less than significant during construction and operation.

c) ***Would the project expose sensitive receptors to substantial pollutant concentrations?***

Less-than-Significant Impact with Mitigation Incorporated. The project would not expose sensitive receptors to substantial pollutant concentrations, as evaluated in the following text.

11 The CEQA Guidelines state that if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (14 CCR 15145).

Sensitive Receptors

Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include sites such as residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993). The nearest sensitive receptors are residential uses located immediately north as well as those approximately 90 feet west of the project site.

Localized Significance Thresholds

The SCAQMD recommends a localized significance threshold (LST) analysis to evaluate localized air quality impacts to sensitive receptors in the immediate vicinity of the project as a result of project activities. The impacts were analyzed using methods consistent with those in the SCAQMD's Final Localized Significance Threshold Methodology (SCAQMD 2008a). The project is located within Source-Receptor Area 34 (Central San Bernardino Valley). This analysis applies the SCAQMD LST values for a 3.5-acre site within Source-Receptor Area 34 with a receptor distance of 25 meters (82 feet), which is the shortest available distance provided in the SCAQMD's methodology.

Project construction activities would result in temporary sources of on-site criteria air pollutant emissions associated with off-road equipment exhaust and fugitive dust generation. According to the Final Localized Significance Threshold Methodology, "off-site mobile emissions from the project should not be included in the emissions compared to the LSTs" (SCAQMD 2008a). Trucks and worker trips associated with the project are not expected to cause substantial air quality impacts to sensitive receptors along off-site roadways since emissions would be relatively brief in nature and would cease once the vehicles pass through the main streets. Off-site emissions from truck trips were limited to 1,000 feet of estimated on-site activity within the LST analysis. The maximum daily on-site emissions generated by construction of the project in each construction year are presented in Table 8 and compared to the SCAQMD localized significance criteria for Source-Receptor Area 34 to determine whether project-generated on-site emissions would result in potential LST impacts.

Table 8. Construction Localized Significance Thresholds Analysis

Year	NO_2	CO	PM_{10}	$PM_{2.5}$
	Pounds per Day (On Site)			
2022	38.87	29.16	10.46	6.03
SCAQMD LST Criteria[a]	*220*	*1,359*	*11*	*6*
Threshold Exceeded?	**No**	**No**	**No**	**Yes**

Source: SCAQMD 2008a; Appendix A-1.
Notes: NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = particulate matter with a diameter less than or equal to 10 microns (coarse particulate matter); $PM_{2.5}$ = particulate matter with a diameter less than or equal to 2.5 microns (fine particulate matter); SCAQMD = South Coast Air Quality Management District; LST = localized significance threshold.
Maximum on-site emissions occurred during the overlap of the following phases: grading and site preparation.
[a] LST are shown for a 3.5-acre disturbed area corresponding to a distance to a sensitive receptor of 25 meters in Source-Receptor Area 34 (Central San Bernardino Valley).

As shown in Table 8, proposed construction activities would generate emissions in excess of site-specific LSTs for PM2.5.

MM-AQ-1: **Fugitive Dust Watering.** To reduce the potential for criteria air pollutants, specifically fugitive particulate matter with an aerodynamic diameter less than or equal to 2.5 microns ($PM_{2.5}$), as a result of construction of the project, the applicant shall:

Comply with SCAQMD rules and regulations regarding emissions generated during construction activities. Rule 403, Fugitive Dust,[12] requires the implementation of measures to control the emission of visible fugitive/nuisance dust, such as wetting soils that would be disturbed. By rule, active sites would be watered at least two times daily, resulting in an approximately 55% reduction of fugitive dust (CalEEMod default value), to further control fugitive PM2.5, the project applicant, or its designee, shall water active sites at least three times daily resulting in an approximately 61% reduction of fugitive dust (CalEEMod default value).

Implementation of **MM-AQ-1** would reduce project construction-generated $PM_{2.5}$ emissions to the extent feasible. The LST results after incorporation of **MM-AQ-1** are presented in Table 9.

Table 9. Construction Localized Significance Thresholds Analysis

Year	NO_2	CO	PM_{10}	$PM_{2.5}$
	Pounds per Day (On Site)			
2022	38.87	29.16	9.28	5.42
SCAQMD LST Criteria[a]	*220*	*1,359*	*11*	*6*
Threshold Exceeded?	**No**	**No**	**No**	**No**

Source: SCAQMD 2008a; Appendix A-1.
Notes: NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = particulate matter with a diameter less than or equal to 10 microns (coarse particulate matter); $PM_{2.5}$ = particulate matter with a diameter less than or equal to 2.5 microns (fine particulate matter); SCAQMD = South Coast Air Quality Management District; LST = localized significance threshold.
Maximum on-site emissions occurred during the overlap of the following phases: grading and site preparation.
[a] LST are shown for a 5-acre disturbed area corresponding to a distance to a sensitive receptor of 25 meters in Source-Receptor Area 34 (Central San Bernardino Valley).

As shown in Table 9, implementation of **MM-AQ-1** would reduce construction-generated $PM_{2.5}$ to levels below SCAQMD thresholds. Thus, impacts would be **less than significant** with mitigation.

Carbon Monoxide Hotspots

Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed federal and/or state standards for CO are termed "CO hotspots." The transport of CO is extremely limited, as it disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthy levels, affecting sensitive receptors. Typically, high CO concentrations are associated with severely congested intersections operating at an unacceptable level of service (LOS) (LOS E or worse is unacceptable). Projects contributing to adverse traffic impacts may result in the formation of a CO hotspot. Additional analysis of CO hotspot impacts would be conducted if a project

12 SCAQMD Rule 403 requires implementation of various best available fugitive dust control measures for different sources for all construction activity sources within its jurisdictional boundaries. Dust control measures include, but are not limited to, maintaining stability of soil through pre-watering of site prior to clearing, grubbing, cut and fill, and earth-moving activities; stabilizing soil during and immediately after clearing, grubbing, cut and fill, and other earth-moving activities; stabilizing backfill during handling and at completion of activity; and pre-watering material prior to truck loading and ensuring that freeboard exceeds 6 inches. While SCAQMD Rule 403 requires fugitive dust control beyond watering control measures, compliance with Rule 403 is represented in CalEEMod by assuming two times daily watering of active sites (55% reduction in PM_{10} and $PM_{2.5}$ [CAPCOA 2017]).

would result in a significant impact or contribute to an adverse traffic impact at a signalized intersection that would potentially subject sensitive receptors to CO hotspots. As discussed in Section 3.17, Transportation, the proposed project is forecast to generate 74 a.m. peak hour trips and 83 p.m. peak hour trips (passenger car equivalent-adjusted), the proposed project would not exceed the 250 two-way peak hour trip threshold for the preparation of a TIA per the CMP or the 100 two-way peak hour trip threshold for preparation of a TIA per the City's Traffic Study Guidelines. Therefore, a TIA and further LOS analysis would not be required, unless requested by the City for a focused analysis of specific facilities.

In addition, at the time that the SCAQMD Handbook (SCAQMD 1993) was published, the SCAB was designated nonattainment under the CAAQS and NAAQS for CO. In 2007, the SCAQMD was designated in attainment for CO under both the CAAQS and NAAQS as a result of the steady decline in CO concentrations in the SCAB due to turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities. The SCAQMD conducted CO modeling for the 2003 AQMP[13] (SCAQMD 2003b) for the four worst-case intersections in the SCAB:

(1) Wilshire Boulevard and Veteran Avenue
(2) Sunset Boulevard and Highland Avenue
(3) La Cienega Boulevard and Century Boulevard
(4) Long Beach Boulevard and Imperial Highway

At the time the 2003 AQMP was prepared, the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day. The 2003 AQMP projected 8-hour CO concentrations at these four intersections for 1997 and from 2002 through 2005. From years 2002 through 2005, the maximum 8-hour CO concentration was 3.8 parts per million at the Sunset Boulevard and Highland Avenue intersection in 2002 and the maximum 8-hour CO concentration was 3.4 parts per million at the Wilshire Boulevard and Veteran Avenue in 2002.

Accordingly, CO concentrations at congested intersections would not exceed the 1-hour or 8-hour CO CAAQS unless projected daily traffic would be at least over 100,000 vehicles per day. Because the project is not anticipated to increase daily traffic volumes at any study intersection to more than 100,000 vehicles per day, a CO hotspot is not anticipated to occur.

Based on these considerations, the project would not generate traffic that would contribute to potential adverse traffic impacts that may result in the formation of CO hotspots. This conclusion is supported by the analysis in Section 3.17, which demonstrates that traffic impacts would be less than significant. In addition, due to continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing. Based on these considerations, the project would result in a less-than-significant impact to air quality with regard to potential CO hotspots.

Toxic Air Contaminants

In addition to impacts from criteria pollutants, certain projects may include emissions of pollutants identified by the state and federal government as toxic air contaminants (TACs) or hazardous air pollutants. State law has established the framework for California's TAC identification and control project, which is generally more stringent than the federal project, and is aimed at TACs that are a problem in California. The

[13] SCAQMD's CO hotspot modeling guidance has not changed since 2003.

state has formally identified more than 200 substances as TACs, including the federal hazardous air pollutants, and is adopting appropriate control measures for sources of these TACs.

In an abundance of caution, a voluntary health risk assessment (HRA) was performed for construction and operation of the project, as discussed below, is presented in Appendix A-2.

The most recent guidance from the Office of Environmental Health Hazard Assessment (OEHHA) is the 2015 Risk Assessment Guidelines Manual (OEHHA 2015), which was adopted in 2015 to replace the 2003 HRA Guidance Manual. The Children's Environmental Health Protection Act of 1999 (Senate Bill 25), which requires explicit consideration of infants and children in assessing risks from air toxics, required revisions of the methods for both non-cancer and cancer risk assessment and of the exposure assumptions in the 2003 HRA Guidance Manual. Cancer risk parameters, such as age-sensitivity factors, daily breathing rates, exposure period, fraction of time at home, and cancer potency factors were based on the values and data recommended by OEHHA as implemented in HARP2. SCAQMD's Modeling Guidance for American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) (SCAQMD 2018) and Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis (SCAQMD 2003c) provide guidance to perform dispersion modeling for use in HRAs within the SCAB.

Health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SCAQMD recommends a carcinogenic (cancer) risk threshold of 10 in one million. Some TACs increase noncancer health risk due to long-term (chronic) exposures. The Chronic Hazard Index is the sum of the individual substance chronic hazard indices for all TACs affecting the same target organ system. The Chronic Hazard Index estimates for all receptor types used the OEHHA-derived calculation method, which uses high-end exposure parameters for the inhalation and next top two exposure pathways and mean exposure parameters for the remaining pathways for non-cancer risk estimates. The Chronic Hazard Index is the sum of the individual substance chronic hazard indices for all TACs affecting the same target organ system.[14] A hazard index less than 1.0 means that adverse health effects are not expected. Within this analysis, noncarcinogenic exposures of less than 1.0 are considered less than significant. The SCAQMD recommends a Chronic Hazard Index significance threshold of 1.0 (project increment) and an acute hazard index of 1.0.

The greatest potential for TAC exposure from project construction and operation is from diesel particulate matter (DPM), as the exhaust from diesel engines is a complex mixture of gases, vapors, and particles, many of which are known human carcinogens. DPM has established cancer risk factors and relative exposure values for long-term chronic health hazard impacts. No short-term, acute relative exposure values are established and regulated and therefore these are not addressed in this assessment.

The dispersion modeling was performed using AERMOD, which is the model SCAQMD requires for atmospheric dispersion of emissions. AERMOD (Version 19191) is a steady-state Gaussian plume model that incorporates air dispersion based on planetary boundary layer turbulence structure and scaling concepts, including treatment of surface and elevated sources, building downwash, and simple and complex terrain (EPA 2018a).

14 The HIC estimates for all receptor types used the OEHHA-derived calculation method (OEHHA 2015).

Construction Health Risk

Construction Health Risk Assessment

An HRA was performed to evaluate potential health risk associated with construction of the project. The following discussion summarizes the dispersion modeling and HRA methodology; supporting construction HRA documentation, including detailed assumptions, is presented in Appendix A-2.

For risk assessment purposes, PM_{10} in diesel exhaust is considered DPM, originating mainly from off-road equipment operating at a defined location for a given length of time at a given distance from sensitive receptors. Less-intensive, more-dispersed emissions result from on road vehicle exhaust (e.g., heavy-duty diesel trucks). For the construction HRA, the CalEEMod scenario for the project was adjusted to reduce diesel truck one-way trip distances to 1,000 feet (0.19 miles) to estimate emissions from truck pass-by at proximate receptors.

The air dispersion modeling methodology was based on generally accepted modeling practices of SCAQMD (SCAQMD 2021a). Air dispersion modeling was performed using the EPA's AERMOD Version 19191 modeling system (computer software) with the Lakes Environmental Software implementation/user interface, AERMOD View Version 9.9.0. The HRA followed OEHHA 2015 guidelines (OEHHA 2015) and SCAQMD guidance to calculate the health risk impacts at all proximate receptors as further discussed below. The dispersion modeling included the use of standard regulatory default options. AERMOD parameters were selected consistent with the SCAQMD and EPA guidance and identified as representative of the project site and project activities. Principal parameters of this modeling are presented in Table 10.

Table 10. American Meteorological Society/Environmental Protection Agency Regulatory Model Principal Parameters

Parameter	Details
Meteorological Data	AERMOD-specific meteorological data for the Riverside Airport air monitoring station (KRAL) was used for the dispersion modeling (SCAQMD 2021b). A 5-year meteorological data set from 2012 through 2016 was obtained from the SCAQMD in a preprocessed format suitable for use in AERMOD.
Urban versus Rural Option	Urban dispersion option was selected due to the developed nature of the project area and per SCAQMD guidelines.
Terrain Characteristics	The elevation of the site is 1,138 feet (347 meters) above sea level.
Elevation Data	Digital elevation data were imported into AERMOD and elevations were assigned to receptors and emission sources, as necessary. Digital elevation data were obtained through the AERMOD View in the United States Geological Survey's National Elevation Dataset format with a resolution of 1/3 degree (approximately 10 meters), consistent with the SCAQMD guidance (SCAQMD 2021a).
Source Release Characterizations	Air dispersion modeling of DPM emissions was conducted assuming the off-road equipment would operate in accordance with the modeling scenario estimated in CalEEMod (Appendix A-1). The construction equipment and on-site truck travel DPM emissions were modeled as a line of adjacent volume sources across the project site to represent project construction with a release height of 5 meters, plume height of 2.33 meters, and plume width of 11.63 meters (SCAQMD 2008a; EPA 2018a).

Note: AERMOD = American Meteorological Society/Environmental Protection Agency Regulatory Model; SCAQMD = South Coast Air Quality Management District; DPM = diesel particular matter; CalEEMod = California Emissions Estimator Model.
See Appendix A.

Regarding receptors, the construction scenario used a 1-kilometer by 1-kilometer Cartesian receptor grid with 50-meter spacing to establish the impact area and evaluate locations of maximum health risk impact (SCAQMD 2021a).

The health risk calculations were performed using the Hotspots Analysis and Reporting Program Version 2 (HARP2) Air Dispersion and Risk Tool (ADMRT, dated 21081). AERMOD was run with all sources emitting unit emissions (1 gram per second) to obtain the necessary input values for HARP2. The line of volume sources was partitioned evenly based on the 1 gram per second emission rate. The ground-level concentration plot files were then used to estimate the long-term cancer health risk to an individual, and the non-cancer chronic health indices. There is no reference exposure level (REL) for acute health impacts from DPM, and, thus, acute risk was not evaluated.

Cancer risk is defined as the increase in probability (chance) of an individual developing cancer due to exposure to a carcinogenic compound, typically expressed as the increased chances in one million. Maximum Individual Cancer Risk is the estimated probability of a maximally exposed individual potentially contracting cancer as a result of exposure to TACs over a period of 30 years for residential receptor locations. For the purposes of this construction HRA, given the less-than-lifetime exposure period, and the higher breathing rates and sensitivity of children to TACs, the cancer risk calculation assumes that the exposure would affect children early in their lives. The 9-month exposure duration was assumed to start during the third trimester of pregnancy through 9 months of age based on the duration of construction. The exposure pathway for DPM is inhalation only.

The SCAQMD has also established non-carcinogenic risk parameters for use in HRAs since some TACs increase non-cancer health risk due to long-term (chronic) exposures and some TACs increase non-cancer health risk due to short-term (acute) exposures. No short-term, acute relative exposure level has been established for DPM; therefore, acute impacts of DPM are not addressed in the HRA. Chronic exposure is evaluated in the construction HRA. Non-carcinogenic risks are quantified by calculating a hazard index, expressed as the ratio between the ambient pollutant concentration and its toxicity or REL, which is a concentration at or below which health effects are not likely to occur. The chronic hazard index is the sum of the individual substance chronic hazard indices for all TACs affecting the same target organ system. A hazard index less of than one (1.0) means that adverse health effects are not expected.

The Maximum Individual Cancer Risk and the Chronic Hazard Index for residential receptors as a result of project construction are presented in Table 11.

Table 11. Construction Health Risk Assessment Results – Unmitigated

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk–Residential	Per Million	67.9	10	Potentially Significant
Chronic Hazard Index–Residential	Index Value	0.025	1.0	Less than Significant

Source: SCAQMD 2019.
Note: CEQA = California Environmental Quality Act.
See Appendix A-2.

As shown in Table 11, project construction activities would result in a Residential Maximum Individual Cancer Risk of 67.9 in 1 million, which exceeds the significance threshold of 10 in 1 million. Project

construction would result in a Residential Chronic Hazard Index of 0.010, which is below the 1.0 significance threshold.

MM-AQ-2: **Tier 4 Interim Engines.** To reduce the potential for criteria air pollutants, specifically particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM_{10}), as a result of construction of the project, the applicant shall:

Prior to the start of construction activities, ensure that all 75 horsepower or greater diesel-powered equipment are powered with CARB-certified Tier 4 interim engines, except where the project applicant establishes to the satisfaction of the City of Highland (City) that Tier 4 interim equipment is not available.

An exemption from these requirements may be granted by the City in the event that the City documents that equipment with the required tier is not reasonably available and corresponding reductions in criteria air pollutant emissions are achieved from other construction equipment. Before an exemption may be considered by the City, the applicant shall be required to demonstrate that two construction fleet owners/operators in San Bernardino County were contacted and that those owners/operators confirmed Tier 4 interim equipment could not be located within San Bernardino County.

As shown in Table 11, the construction HRA results from the unmitigated scenario show cancer risks exceeding the 10 in 1 million threshold and thus a potentially significant impact at the maximally exposed individual residential receptors. Implementation of **MM-AQ-2** would reduce project construction-generated DPM missions to the extent feasible. The HRA results after incorporation of **MM-AQ-2** are presented in Table 12.

Table 12. Construction Health Risk Assessment Results – Mitigated

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk–Residential	Per Million	6.50	10	Less than significant
Chronic Hazard Index–Residential	Index Value	0.024	1.0	Less than Significant

Source: SCAQMD 2019.
Notes: CEQA = California Environmental Quality Act.
See Appendix A-2.

Implementation of **MM-AQ-2** would reduce construction-generated health risks to levels below SCAQMD thresholds. Thus, impacts would be **less than significant** with mitigation.

Operational Health Risk

An HRA was performed to evaluate potential health risk associated with operation of the project. The following discussion summarizes the dispersion modeling and HRA methodology; supporting operational HRA documentation, including detailed assumptions, is presented in Appendix A-2.

CARB's Air Quality and Land Use Handbook: A Community Health Perspective encourages consideration of the health impacts of distribution centers that accommodate more than 100 trucks per day on sensitive receptors sited within 1,000 feet from the source in the land use decision-making process (CARB 2005).

For the operational HRA (included as Appendix A-2), operational year 2023 was assumed, consistent with completion of project construction. Emissions from the operation of the project include truck trips and truck idling emissions. For risk assessment purposes, PM_{10} in diesel exhaust is considered DPM, originating mainly from trucks traveling on site and off site and trucks idling at the loading docks. Truck travel and idling emission rates were obtained from CARB's EMFAC2021. Emission factors representing the vehicle mix and emissions for 2023 were used to estimate emissions associated with operation of the project. Truck idling would be limited to 5 minutes in accordance with CARB's adopted Airborne Toxic Control Measure; however, truck idling was conservatively assumed to idle for 15 minutes.[15] Therefore, the analysis conservatively overestimates DPM emissions from idling. Deliveries would occur every day of the week. A total of 35 forklifts were assumed to operate with the project loading dock areas. The forklifts were modeled as diesel powered with Tier 4 Interim compliant engines.

Conservatively, a 2023 EMFAC2021 run was conducted and a constant 2023 emission factor data set was used for the entire duration of the analysis (i.e., 30 years). Use of the 2023 emission factors would overstate potential impacts since this approach does not include reductions in emissions due to fleet turnover or cleaner technology with lower emissions. The truck travel DPM emissions were calculated by applying the exhaust PM_{10} emission factor from EMFAC2021 and the total truck trip number over the length of the distance traveled. In addition, the on-site truck idling exhaust emissions were calculated by applying the idle exhaust PM_{10} emission factor from EMFAC2021 and total truck trip over the total idling time (i.e., 15 minutes). The truck traffic was modeled as a line of adjacent volume sources with 20% of the truck traffic entering and exiting the project site south via Grape St. and head east on 6th St. to Victoria St. An estimated 80% of the truck traffic would enter and exit the site from Victoria St with 30% and 70% of the total truck traffic traveling to and from the north and south, respectively. Trucks travel north on Victoria to and from SR-210. Trucks travel south on Victoria and then to SR-210 via 5th St. Truck idling was modeled as stationary point sources at the 30 truck loading bays. The forklifts were modeled as a line of adjacent volume sources operating within the truck loading bay area.

As previously described, health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SCAQMD recommends a carcinogenic (cancer) risk threshold of 10 in one million. Some TACs increase noncancer health risk due to long-term (chronic) exposures. A hazard index less than one (1.0) means that adverse health effects are not expected. Within this analysis, noncarcinogenic exposures of less than 1.0 are considered less than significant. The exhaust from diesel engines is a complex mixture of gases, vapors, and particles, many of which are known human carcinogens. DPM has established cancer risk factors and relative exposure values for long-term chronic health hazard impacts. No short-term, acute relative exposure values are established and regulated and are therefore not addressed in this assessment.

The air dispersion modeling methodology was based on generally accepted modeling practices of SCAQMD (SCAQMD 2021a). Air dispersion modeling was performed using the EPA's AERMOD (Version 19191) modeling system with the Lakes Environmental Software implementation/user interface, AERMOD View Version 9.9.0. The HRA followed the OEHHA 2015 guidelines (OEHHA 2015) and SCAQMD guidance to calculate the health risk impacts at all proximate receptors as further discussed below. The dispersion modeling included the use of standard regulatory default options. AERMOD parameters were selected

15 Although the project is required to comply with CARB's idling limit of 5 minutes, on-site idling emissions was estimated for 15 minutes of truck idling, which would take into account on-site idling while the trucks are waiting to pull up to the loading dock, idling at the loading dock, and idling during check-in and check-out.

consistent with the SCAQMD and EPA guidance and identified as representative of the project site and project activities. Principal parameters of this modeling are presented in Table 13.

Table 13. Operational Health Risk Assessment American Meteorological Society/U.S. Environmental Protection Agency Regulatory Model Operational Principal Parameters

Parameter	Details
Meteorological Data	AERMOD-specific meteorological data for the Riverside Airport air monitoring station (KRAL) was used for the dispersion modeling (SCAQMD 2021b). A 5-year meteorological data set from 2012 through 2016 was obtained from the SCAQMD in a preprocessed format suitable for use in AERMOD.
Urban versus Rural Option	Urban dispersion option was selected due to the developed nature of the project area and per SCAQMD guidelines.
Terrain Characteristics	The elevation of the site is 1,138 feet (347 meters) above sea level.
Emission Sources and Source Release Parameters	Air dispersion modeling of operational activities was conducted using emissions generated using EMFAC2021 and CalEEMod. Off-site and on-site truck travel were modeled as a line of adjacent volume sources, and based on EPA methodology, the modeled sources would result in a release height of 3.4 meters, a plume height of 6.8 meters, and a plume width of 6.6 meters (SBCAPCD 2020; EPA 2015). The truck idling emissions at loading docks were modeled as point sources with a release height of 4 meters, inside stack diameter of 0.1 meters and an exist velocity of 51.71 m/s (EPA 2015; SCAQMD 2003b; SJVAPCD 2006). The project warehouse building was modeled to account for building downwash for point sources. Forklifts were modeled as a line of adjacent volume sources, and based on EPA methodology, the modeled sources would result in a release height of 1.96 meters, a plume height of 4.85 meters, and a plume width of 2.25 meters

Note: AERMOD = American Meteorological Society/Environmental Protection Agency Regulatory Model; SCAQMD = South Coast Air Quality Management District; EPA = U.S. Environmental Protection Agency.
See Appendix A-2.

Regarding receptors, the operational HRA scenario built from the construction HRA's 1-kilometer by 1-kilometer Cartesian receptor grid with 50-meter spacing to establish the impact area and evaluate locations of maximum health risk impact (SCAQMD 2021a). The operational scenario added receptors at 50-meter spacing at sensitive receptor areas adjacent to the truck routes discussed above.

The health risk calculations were performed using the HARP2 Air Dispersion and Risk Tool (ADMRT, dated 19121). AERMOD was run with all sources or source groups emitting unit emissions (1 gram per second) to obtain the necessary input values for HARP2. The line of volume sources was partitioned evenly based on the 1 gram per second emission rate. The ground-level concentration plot files were then used to estimate the long-term cancer health risk to an individual, and the non-cancer chronic health indices. There is no REL for acute health impacts from DPM, and, thus, acute risk was not evaluated.

Cancer risk is defined as the increase in probability (chance) of an individual developing cancer due to exposure to a carcinogenic compound, typically expressed as the increased chances in one million. Maximum Individual Cancer Risk is the estimated probability of a maximally exposed individual potentially contracting cancer as a result of exposure to TACs over a period of 30 years for residential receptor locations. The HRA assumes exposure would start in the third trimester of pregnancy through 30 years for all residential sensitive receptor locations. The exposure pathway for DPM is inhalation only.

The SCAQMD has also established non-carcinogenic risk parameters for use in HRAs since some TACs increase non-cancer health risk due to long-term (chronic) exposures and some TACs increase non-cancer health risk due to short-term (acute) exposures. No short-term, acute relative exposure level has been established for DPM; therefore, acute impacts of DPM are not addressed in the HRA. Chronic exposure is evaluated in the operational HRA. Non-carcinogenic risks are quantified by calculating a hazard index, expressed as the ratio between the ambient pollutant concentration and its toxicity or REL, which is a concentration at or below which health effects are not likely to occur. The chronic hazard index is the sum of the individual substance chronic hazard indices for all TACs affecting the same target organ system. A hazard index less of than one (1.0) means that adverse health effects are not expected.

The results of the health risk assessment during operation are provided in Table 14.

Table 14. Operational Health Risk Assessment Results

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk–Residential	Per Million	9.59	10	Less than Significant
Chronic Hazard Index–Residential	Index Value	0.003	1.0	Less than Significant

Source: SCAQMD 2019.
Notes: CEQA = California Environmental Quality Act.
See Appendix A-2.

As shown in Table 14, project operation would result in a Residential Maximum Individual Cancer Risk of 9.59 in 1 million, which is below the significance threshold of 10 in 1 million. Project operation would result in a Residential Chronic Hazard Index of 0.003, which is below the 1.0 significance threshold. The project operational TAC health risk impacts would be **Less than Significant.**

Health Effects of Criteria Air Pollutants

Construction and operation of the project would generate criteria air pollutant emissions; however, estimated construction and operational emissions would not exceed the SCAQMD mass-emission daily thresholds as shown in Tables 6 and 7, respectively. As previously discussed, the SCAB has been designated as a federal nonattainment area for O_3 and $PM_{2.5}$ and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$.

Health effects associated with O_3 include respiratory symptoms, worsening of lung disease leading to premature death, and damage to lung tissue (CARB 2021). VOCs and NO_x are precursors to O_3, for which the SCAB is designated as nonattainment with respect to the NAAQS and CAAQS. The contribution of VOCs and NO_x to regional ambient O_3 concentrations is the result of complex photochemistry. The increases in O_3 concentrations in the SCAB due to O_3 precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O_3 concentrations would also depend on the time of year that the VOC emissions would occur because exceedances of the O_3 ambient air quality standards tend to occur between April and October when solar radiation is highest. The holistic effect of a single project's emissions of O_3 precursors is speculative because of the lack of quantitative methods to assess this impact. Because construction and operation of the project would not result in O_3 precursor emissions (i.e., VOCs or NO_x) that would exceed the SCAQMD thresholds (as shown in Tables 6 and 7) the project is not anticipated to substantially contribute to regional O_3 concentrations and their associated health impacts.

Health effects associated with NO_x include lung irritation and enhanced allergic responses (CARB 2021). Construction and operation of the project would not generate NO_x emissions that would exceed the SCAQMD mass daily thresholds; therefore, construction and operation of the project is not anticipated to contribute to exceedances of the NAAQS and CAAQS for NO_2 or contribute to associated health effects. In addition, the SCAB is designated as in attainment of the NAAQS and CAAQS for NO_2, and the existing NO_2 concentrations in the area are well below the NAAQS and CAAQS standards.

Health effects associated with CO include chest pain in patients with heart disease, headache, light-headedness, and reduced mental alertness (CARB 2021). CO tends to be a localized impact associated with congested intersections. CO hotspots were discussed previously as a less-than-significant impact. Thus, the project's CO emissions would not contribute to the health effects associated with this pollutant.

Health effects associated with PM_{10} and $PM_{2.5}$ include premature death and hospitalization, primarily for worsening of respiratory disease (CARB 2021). As with O_3 and NO_x, and as shown in Tables 6 and 7, the project would not generate emissions of PM_{10} or $PM_{2.5}$ that would exceed the SCAQMD's thresholds. Accordingly, the project's PM_{10} and $PM_{2.5}$ emissions are not expected to cause an increase in related health effects for this pollutant.

The California Supreme Court's decision in *Sierra Club v. County of Fresno* (2018) 6 Cal. 5th 502 (referred to herein as the Friant Ranch decision; issued on December 24, 2018) addressed the need to correlate mass emission values for criteria air pollutants to specific health consequences and contains the following direction from the California Supreme Court:

> "The Environmental Impact Report (EIR) must provide an adequate analysis to inform the public how its bare numbers translate to create potential adverse impacts or it must explain what the agency *does* know and why, given existing scientific constraints, it cannot translate potential health impacts further" (Italics in original).

Currently, SCAQMD, CARB, and EPA have not approved a quantitative method to reliably, meaningfully, and consistently translate the mass emission estimates for the criteria air pollutants resulting from the project to specific health effects. In addition, there are numerous scientific and technological complexities associated with correlating criteria air pollutant emissions from an individual project to specific health effects or potential additional nonattainment days.

In connection with the judicial proceedings culminating in issuance of the Friant Ranch decision, the SCAQMD and the San Joaquin Valley Air Pollution Control District (SJVAPCD) filed amicus briefs attesting to the extreme difficulty of correlating an individual project's criteria air pollutant emissions to specific health impacts. Both SJVAPCD and SCAQMD have among the most sophisticated air quality modeling and health impact evaluation capabilities of the air districts in California. The key relevant points from the SCAQMD and SJVAPCD briefs are summarized herein.

In requiring a health impact type of analysis for criteria air pollutants, it is important to understand how O_3 and particulate matter (PM) are formed, dispersed, and regulated. The formation of O_3 and PM in the atmosphere, as secondary pollutants,[16] involves complex chemical and physical interactions of multiple pollutants from natural and anthropogenic sources. The O_3 reaction is self-perpetuating (or catalytic) in the presence of sunlight because NO_2 is photochemically reformed from nitric oxide. In this way, O_3 is controlled

[16] Air pollutants formed through chemical reactions in the atmosphere are referred to as secondary pollutants.

by both NO_x and VOC emissions (NRC 2005). The complexity of these interacting cycles of pollutants means that incremental decreases in one emission may not result in proportional decreases in O_3 (NRC 2005). Although these reactions and interactions are well understood, variability in emission source operations and meteorology creates uncertainty in the modeled O_3 concentrations to which downwind populations may be exposed (NRC 2005). Once formed, O_3 can be transported long distances by wind and due to atmospheric transport, contributions of precursors from the surrounding region can also be important (EPA 2008). Because of the complexity of O_3 formation, a specific tonnage of VOCs or NO_x emitted in a particular area does not equate to a particular concentration of O_3 in that area (SJVAPCD 2015).

PM can be divided into two categories: directly emitted PM and secondary PM. Secondary PM, like O_3, is formed via complex chemical reactions in the atmosphere between precursor chemicals such as SO_x and NO_x (SJVAPCD 2015). Because of the complexity of secondary PM formation, including the potential to be transported long distances by wind, the tonnage of PM-forming precursor emissions in an area does not necessarily result in an equivalent concentration of secondary PM in that area (SJVAPCD 2015). This is especially true for individual projects, like the proposed project, where project-generated criteria air pollutant emissions are not derived from a single "point source," but from construction equipment and mobile sources (passenger cars and trucks) driving to, from, and around the project site.

Additionally, health effects from air pollutants are related to the concentration of the air pollutant that an individual is exposed to, not necessarily the individual mass quantity of emissions associated with an individual project. For example, health effects from O_3 are correlated with increases in the ambient level of O_3 in the air a person breathes (SCAQMD 2015). However, it takes a large amount of additional precursor emissions to cause a modeled increase in ambient O_3 levels over an entire region (SCAQMD 2015). The lack of link between the tonnage of precursor pollutants and the concentration of O_3 and $PM_{2.5}$ formed is important because it is not necessarily the tonnage of precursor pollutants that causes human health effects; rather, it is the concentration of resulting O_3 that causes these effects (SJVAPCD 2015). Indeed, the ambient air quality standards, which are statutorily required to be set by EPA at levels that are requisite to protect the public health, are established as concentrations of O_3 and $PM_{2.5}$ and not as tonnages of their precursor pollutants (EPA 2018a). Because the ambient air quality standards are focused on achieving a particular concentration region-wide, the tools and plans for attaining the ambient air quality standards are regional in nature. For CEQA analyses, project-generated emissions are typically estimated in pounds per day or tons per year and compared to mass daily or annual emission thresholds. While CEQA thresholds are established at levels that the air basin can accommodate without affecting the attainment date for the ambient air quality standards, even if a project exceeds established CEQA significance thresholds, this does not mean that one can easily determine the concentration of O_3 or PM that will be created at or near the project site on a particular day or month of the year, or what specific health impacts will occur (SJVAPCD 2015).

In regard to regional concentrations and air basin attainment, the SJVAPCD emphasized that attempting to identify a change in background pollutant concentrations that can be attributed to a single project, even one as large as the entire Friant Ranch Specific Plan, is a theoretical exercise. The SJVAPCD brief noted that it "would be extremely difficult to model the impact on NAAQS attainment that the emissions from the Friant Ranch project may have" (SJVAPCD 2015). The situation is further complicated by the fact that background concentrations of regional pollutants are not uniform either temporally or geographically throughout an air basin, but are constantly fluctuating based upon meteorology and other environmental factors. SJVAPCD noted that the currently available modeling tools are equipped to model the impact of all emission sources in the San Joaquin Valley Air Basin on attainment (SJVAPCD 2015). The SJVAPCD brief then indicated that, "running the photochemical grid model used for predicting O_3 attainment with the

emissions solely from the Friant Ranch project (which equate to less than 0.1% of the total NO_x and VOC in the Valley) is not likely to yield valid information given the relative scale involved" (SJVAPCD 2015).

SCAQMD and SJVAPCD have indicated that it is not feasible to quantify project-level health impacts based on existing modeling (SCAQMD 2015; SJVAPCD 2015). Even if a metric could be calculated, it would not be reliable because the models are equipped to model the impact of all emission sources in an air basin on attainment and would likely not yield valid information or a measurable increase in O_3 concentrations sufficient to accurately quantify O_3-related health impacts for an individual project.

Nonetheless, following the Supreme Court's Friant Ranch decision, some EIRs where estimated criteria air pollutant emissions exceeded applicable air district thresholds have included a quantitative analysis of potential project-generated health effects using a combination of a regional photochemical grid model[17] and the EPA Benefits Mapping and Analysis Program (BenMAP or BenMAP–Community Edition).[18] The publicly available health impact assessments (HIAs) typically present results in terms of an increase in health incidences and/or the increase in background health incidence for various health outcomes resulting from the project's estimated increase in concentrations of O_3 and $PM_{2.5}$.[19] To date, the five publicly available HIAs reviewed herein have concluded that the evaluated project's health effects associated with the estimated project-generated increase in concentrations of O_3 and $PM_{2.5}$ represent a small increase in incidences and a very small percent of the number of background incidences, indicating that these health impacts are negligible and potentially within the models' margin of error. It is also important to note that while the results of the five available HIAs conclude that the project emissions do not result in a substantial increase in health incidences, the estimated emissions and assumed toxicity are also conservatively inputted into the HIA and thus overestimate health incidences, particularly for $PM_{2.5}$.

As explained in the SJVAPCD brief and noted previously, running the photochemical grid model used for predicting O_3 attainment with the emissions solely from an individual project like the Friant Ranch project or the proposed project is not likely to yield valid information given the relative scale involved. The five examples reviewed support the SJVAPCD's brief contention that consistent, reliable, and meaningful results may not be provided by methods applied at this time. Accordingly, additional work in the industry and more importantly, air district participation, is needed to develop a more meaningful analysis to correlate project-level mass criteria air pollutant emissions and health effects for decision makers and the public. Furthermore, at the time of writing, no HIA has concluded that health effects estimated using the photochemical grid model and BenMAP approach are substantial provided that the estimated project-

17 The first step in the publicly available HIAs includes running a regional photochemical grid model, such as the Community Multiscale Air Quality model or the Comprehensive Air Quality Model with extensions to estimate the increase in concentrations of O_3 and $PM_{2.5}$ as a result of project-generated emissions of criteria and precursor pollutants. Air districts, such as the SCAQMD, use photochemical air quality models for regional air quality planning. These photochemical models are large-scale air quality models that simulate the changes of pollutant concentrations in the atmosphere using a set of mathematical equations characterizing the chemical and physical processes in the atmosphere (EPA 2017).

18 After estimating the increase in concentrations of O_3 and $PM_{2.5}$, the second step in the five examples includes use of BenMAP or BenMAP-Community Edition to estimate the resulting associated health effects. BenMAP estimates the number of health incidences resulting from changes in air pollution concentrations (EPA 2018b). The health impact function in BenMAP-Community Edition incorporates four key sources of data: (i) modeled or monitored air quality changes, (ii) population, (iii) baseline incidence rates, and (iv) an effect estimate. All of the five example HIAs focused on O_3 and $PM_{2.5}$.

19 The following CEQA documents included a quantitative HIA to address Friant Ranch: (1) California State University Dominguez Hills 2018 Campus Master Plan EIR (CSU Dominguez Hills 2019), (2) March Joint Powers Association K4 Warehouse and Cactus Channel Improvements EIR (March JPA 2019), (3) Amendment to Norman Y. Mineta San Jose Airport Amendment to the Airport Master Plan EIR (City of San Jose 2020), (4) City of Inglewood Basketball and Entertainment Center Project EIR (City of Inglewood 2019), and (5) San Diego State University Mission Valley Campus Master Plan EIR (SDSU 2019).

generated incidences represent a very small percent of the number of background incidences, potentially within the models' margin of error.

In summary, construction and operation of the project would not result in exceedances of the SCAQMD significance thresholds for certain criteria pollutants, and potential health effects associated with criteria air pollutants would be less than significant.

In addition, an analysis of the project's potential to exceed the SCAQMD LSTs is presented above. The SCAQMD developed the LST analysis in response to CARB Governing Board's Environmental Justice Enhancement Initiative I-4. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable NAAQS or CAAQS (which are health protective standards) at the nearest sensitive receptor, taking into consideration ambient concentrations in each source receptor area, project size, and distance to the nearest sensitive receptor. LSTs has been developed for NO_2, CO, PM_{10}, and $PM_{2.5}$. As presented above, the project's localized construction emissions would not exceed site-specific LSTs with mitigation, and impacts would be less than significant with mitigation.

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less-than-Significant Impact. The project would result in emissions, including criteria air pollutant and TACs; however, those are addressed under Sections 3.3(b) and 3.3(c). Accordingly, the evaluation of other emissions is focused on the potential for the project to generate odors. The occurrence and severity of potential odor impacts depend on numerous factors. The nature, frequency, and intensity of the source; the wind speed and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

Odors would be potentially generated from vehicles and equipment exhaust emissions during construction of the project. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. Such odors would disperse rapidly from the project site and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction would be less than significant.

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). The project entails operation of a warehouse and would not create any new sources of odors during operation. Therefore, project operations would result in an odor impact that is less than significant.

3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
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 U.S. 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?	☐	☐	☐	☒

The following analysis relies on a biological resources assessment conducted by Dudek biologist Eilleen Salas on March 23, 2021. This assessment included a review of the latest available relevant literature, published research, maps, soil data, data on biological baselines, special-status habitats, and species distributions to determine those resources that have the potential to occur within the project site and surrounding 100-foot buffer (the biological study area). A field assessment was conducted to characterize the environmental conditions, vegetation communities/land covers, and any plants or wildlife (including their habitats) that could be impacted during project implementation. During the field survey, vegetation communities and land covers were catalogued and confirmed based on existing site conditions. Dudek compiled a general inventory of plant and wildlife species and made a

determination concerning the potential for special-status species to occur within the study area. Additionally, Dudek conducted an investigation of jurisdictional waters of the U.S. regulated by the U.S. Army Corps of Engineers (ACOE), jurisdictional waters of the state regulated by the Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW) jurisdictional streambed and associated riparian habitat. Field data and supporting documentation are included within this Draft IS/MND as Appendix B, Biological Resources Attachments.

Dudek searched the CDFW's California Natural Diversity Database (CDFW 2021), the California Native Plant Society's Inventory of Rare and Endangered Plants (CNPS 2021), and the U.S. Fish and Wildlife Service's occurrence data (USFWS 2020a) to identify special-status biological resources from the region. The California Natural Diversity Database and California Native Plant Society were searched based on the U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle map for Redlands, where the study area is located, as well as the surrounding eight USGS 7.5-minute quadrangle maps (San Bernardino North, Harrison Mtn, Keller Peak, San Bernardino South, Yucaipa, Riverside East, Sunnymead, and El Casco). Potential and/or historic drainages, if any, and aquatic features were investigated based on a review of USGS topographic maps (1:24,000 scale), aerial photographs, the National Wetland Inventory database (USFWS 2020b), and the Natural Resource Conservation Service Web Soil Survey (USDA 2021).

The study area for this effort includes the approximately 12.5-acre Project site, with a surrounding 100-foot buffer. for a total study area of approximately 20.3 acres (Figure 14, Biological Study Area). This Project is located on Section 6, Township 1 South, Range 3 West, and on the Redlands 7.5-minute USGS topographic quadrangle map. The surrounding areas include residential and commercial development to the north, east, south, and west of the study area. The closest regionally significant biological resource is the Santa Ana River, located outside of the study area, approximately 1.25 miles south, and separated by residential and industrial properties. Two soil types were found within the survey area: Hanford coarse sandy loam and Tujunga gravelly loamy sand (Figure 15, Soils. However, most soils within the property were disturbed and compact.

The study area is comprised of multiple residential properties with ornamental landscaped vegetation and disturbed areas with non-native vegetation. Vegetation communities within the study area include non-native grasslands along the western, northern, and south eastern portions of the project site. These areas are dominated by non-native vegetation such as mouse barley (*Hordeum murinum*) and redstem stork's bill (*Erodium cicutarium*) and are regularly subject to weed abatement and grazing. Developed land with ornamental landscapes is found centralized within the study area. A small drainage feature was recorded along the southeastern portion of the project site. This area consisted of disturbed tall flatsedge (*Cyperus eragrostis*) and annual rabbitsfoot grass (*Polypogon monspeliensis*) within the channel. Other non-native ruderal species observed along the banks were burclover (*Medicago polymorpha*) and common sowthistle (*Sonchus oleraceus*). A map of the landscape and vegetation communities within the Biological Study area is depicted on Figure 16, Vegetation Communities. No sensitive vegetation communities were observed within the study area.

The vegetation within the study area is what is typical for urbanized areas in the region. A total of 18 plant species, 4 native and 14 non-native, were recorded within the biological study area (Appendix B, Biological Resources Attachments, Appendix B-1, Wildlife Compendium). The recorded native flora is likely limited due to the disturbed and urbanized setting of this site.

Wildlife species observed during the field survey of the study area were limited to five species including house sparrow (*Passer domesticus*), northern mockingbird (*Mimus polyglottos*), American crow (*Corvus brachyrhynchos*), mourning dove (*Zenaida macroura*), domestic cat (*Felis catus*), domestic dog (*Canis domesticus*), and domestic horses on the residential properties (*Equus caballus*). These species are typical in an urban and developed setting. Other species expected to occur include the western fence lizard (*Sceloporus occidentalis*).

a) ***Would the project 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?***

No Impact. The study area consists of disturbed areas dominated by non-native vegetation and developed residences with ornamental landscapes. As stated previously, a California Natural Diversity Database search was conducted for the Redlands quadrangle and the eight surrounding quadrangles. Special-status species have historically been sighted within a 1-mile radius of the study areas; however, these species were found within the Santa Ana River located 1 mile south of the study area. Due to the lack of suitable habitat and the disturbed nature of a small drainage feature within the study area, special-status species potential to occur on site were low or not expected (Appendix B-2, Plant Species Potential to Occur and Appendix B-3, Wildlife Species Potential to Occur). Therefore, this project will not have a substantial effect on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW and U.S. Fish and Wildlife Service and no mitigation is required.

b) ***Would the project 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 U.S. Fish and Wildlife Service?***

Less-than-Significant Impact. A drainage feature was documented on the southeastern corner of the project site. The feature is a roadside swale/disturbed drainage ditch with a portion of the channel upstream containing riprap and the remainder consisting of disturbed tall flatsedge (*Cyperus eragrostis*) and rabbitsfoot grass (*Polypogon monspeliensis*) with non-native vegetation and disturbed soils. Adequate hydrology was observed along with hydrophytic vegetation; however, no hydric soils were found. This drainage feature does not pass the "three parameter test" and is not considered a federally protected wetland. Existing regulatory processes, including the 404 Permit or Nationwide Permit from the Army Corps of Engineers, a 401 Certification or Waste Discharge Requirement from the Regional Water Quality Control Board, and a Streambed Alteration Agreement from the California Department of Fish and Wildlife may be required if the applicable resource agency(ies) determine that the drainage is a regulated feature.

c) ***Would the project 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?***

Less-than-Significant Impact. As explained above, a drainage feature was documented on the southeastern corner of the project site. Adequate hydrology was observed along with hydrophytic vegetation; however, no hydric soils were found. This is a disturbed drainage ditch with a portion of the channel upstream containing riprap and the remainder consisting of disturbed tall flatsedge (*Cyperus eragrostis*; facultative wetland (FACW)) and rabbitsfoot grass (*Polypogon monspeliensis*; FACW) with non-native vegetation and disturbed soils. The drainage feature travels from north to south. Features indicative of an ordinary high water mark were observed throughout the channel including a natural line impressed on beds and banks and a change in plant community. This drainage feature does not pass the "three parameter test" and is not considered a federally protected wetland. Existing regulatory processes, including the 404 Permit or Nationwide Permit from the Army Corps of Engineers, a 401 Certification or Waste Discharge Requirement from the Regional Water Quality Control Board, and a Streambed Alteration Agreement from the California Department of Fish and Wildlife may be required if the applicable resource agency(ies) determine that the drainage is a regulated feature. Through regulatory compliance, impacts to the drainage would be considered less than significant.

d) ***Would the project 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?***

Less-than-Significant Impact with Mitigation Incorporated. Wildlife movement corridors, also referred to as dispersal corridors or landscape linkages, are generally defined as linear features along which animals can travel from one habitat or resource area to another. The project site is within a highly urbanized area and does not function as a corridor or linkage between large open space areas capable of supporting wildlife. Existing terrestrial wildlife movement through the study area and surrounding areas is expected to be primarily by medium-sized mammals that are adapted to the urban environment (e.g., coyote, *Canis latrans*) and the project is not expected to alter that use. Project-related construction and operation would have no adverse effects on the movement by any native resident or migratory wildlife species.

As previously described, the study area is generally made up of disturbed or existing development with ornamental landscapes. Although the trees found near these residential developments are primarily non-native, they may provide nesting sites for birds and raptors that are protected under the federal Migratory Bird Treaty Act and/or California Fish and Game Code. To avoid potential direct impacts to all nesting birds, the proposed project would implement mitigation measure MM-BIO-1.

MM-BIO-1 **Nesting Birds.** Commencement of construction activities shall avoid the February 1 through August 31 bird nesting season to the greatest extent feasible. If construction activities must begin within this nesting season, a survey for nesting birds shall be conducted by a qualified biologist within 72 hours before commencement of construction activities. The area surveyed shall include all clearing/construction areas, as well as areas within a 500-foot buffer around the site, or as otherwise determined by the biologist. If no active bird nests are identified on, or within the 500-foot buffer, no further action is necessary and construction activities could commence.

If active nests are found during pre-construction surveys or at anytime throughout the course of construction activities during the nesting bird season, all clearing/construction activities within a minimum 100 feet of the nest shall be postponed until a wildlife biologist has identified the nesting species. If the avian species is protected under the Migratory Bird Treaty Act and/or the California Fish and Game Code, a minimum buffer zone shall be established by the qualified biologist based on the type of bird/raptor species identified and the construction buffer shall be established on site through the erection of cones/flagging/fencing to clearly delineate the protection zone. All construction activities shall avoid this protection zone until a qualified biologist has confirmed that the nest(s) is no longer active, the nest is vacated, and there is no evidence of second nesting attempts.

With implementation of MM-BIO-1, impacts to nesting birds from construction-related activities would be less than significant.

e) ***Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?***

Less than significant Impact. The City of Highland's Municipal Code Chapter 8.36 states a permit must be issued by the Department, for the removal or relocation of any heritage tree. A heritage tree is defined as any live tree, shrub or plant which meets specific criteria within the Municipal Code, including "All woody plants in excess of 15 feet in height and having a single trunk circumference of 24 inches or more, as measured four and one-half

feet above ground level." Several trees meeting this definition are located throughout the project site and are proposed to be removed as part of the project. None of these trees have been designated as historical landmarks. With the implementation of proper permitting, HMC Section 8.36.040, when needed, the project would not conflict with any local policies or ordinances protecting biological resources such as a tree preservation policy or ordinance. Therefore, impacts would be less than significant.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The project site is not located within a Habitat Conservation Plan, Natural Community Conservation Plan, or similar plan (CDFW 2019). The site is not located within or proximate to any Significant Ecological Area, Land Trust, or Conservation Plan. As such, no impact resulting from a conflict with an adopted conservation plan would occur.

3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

The following analysis is based, in part, on the Historical Resources Technical Report and the Archaeological Resource Assessment prepared by Dudek in June 2021, included as Appendix C-1 and Appendix C-2, respectively.

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Less-than-Significant Impact. As defined by the CEQA Guidelines, a "historical resource" is considered to be a resource that is listed in or eligible for listing in the National Register of Historic Places (NRHP) or California Register of Historic Resources (CRHR), has been identified as significant in a historical resource survey, or is listed on a local register of historical resources.

A built environment intensive-level survey was conducted on April 14, 2021, which surveyed 6 parcels properties within the project site. The intensive-level survey involved visiting each property and recording all buildings and structures with notes and photographs. Properties surveyed were fell into two categories: vacant and undeveloped and built environment resources. Three parcels surveyed were vacant properties and fully accessible and visible from the public right-of-way, including: Parcel 4: APN 1192-281-09, Parcel

5: APN 1192-281-12, and Parcel 6: APN 1192-281-14. Three properties, Parcel 1: 7834 Victoria Avenue (APN 1192-281-10), Parcel 2: 26432 6th Street (APN 1192-281-11), and Parcel 3: 7809 Grape Street (APN 1192-281-13) were positive for built environment resources over 45 years old. These parcels contained single-family residences and ancillary buildings including mobile homes, garages, sheds, horse barns, shade structures, and storage buildings.

The property significance evaluation was prepared by architectural historians meeting the Secretary of the Interior's Professional Qualification Standards for architectural history. The evaluation considers NRHP, CRHR, and City of Highland significance criteria and integrity requirements. As defined by the CEQA Guidelines (14 CCR 15000 et seq.), a "historical resource" is considered to be a resource if it is listed in or eligible for listing in the NRHP or CRHR, has been identified as significant in a historical resource survey, or is listed on a local register of historical resources.

The criteria for listing resources in the CRHR were developed in accordance with previously established criteria developed for listing in the NRHP. Thus, the following criteria are expressed in accordance with the NRHP criteria. According to PRC Section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains "substantial integrity," and (ii) meets at least one of the following criteria:

(1) Is associated with events that have made a significant contribution to the broad pattern of our history
(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

The City of Highland Cultural Resource Designation Criteria are listed under the Historic and Cultural Preservation Ordinance, adopted in 2021. An improvement, natural feature, or site may be nominated as a cultural resource by the historic and cultural preservation board pursuant to HMC 16.32.060 if it meets the criteria for listing on the National Register of Historic Places or the following:

A. It exemplifies or reflects special elements of the city's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history;
B. It is identified with persons or events significant in local, state, or national history;
C. It embodies distinctive characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship;
D. It is representative of the work of a notable builder, designer, or architect;
E. It contributes to the significance of an historic area, being a geographically definable area possessing a concentration of historic or scenic properties or thematically related grouping of properties which contribute to each other and are unified aesthetically by plan or physical development;
F. It has a unique location or singular physical characteristics or is a view or vista representing an established and familiar visual feature of a neighborhood, community, or the city of Highland;
G. It embodies elements of architectural design, detail, materials, or craftsmanship that represent a significant structural or architectural achievement or innovation;
H. It is similar to other distinctive properties, sites, areas, or objects based on a historic, cultural, or architectural motif.

I. It reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning.

J. It is one of the few remaining examples in the city, region, state, or nation possessing distinguishing characteristics of an architectural or historical type of specimen. (Ord. 171 § 8.50, 1994)

Under CEQA, a project may have a significant effect on the environment if it may cause "a substantial adverse change in the significance of an historical resource" (California Public Resources Code, Section 21084.1; 14 CCR 15064.5[b]). If a site is listed or eligible for listing in the CRHR, included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of California Public Resources Code, Section 5024.1[q]), it is a "historical resource" and is presumed to be historically or culturally significant for the purposes of CEQA (California Public Resources Code, Section 21084.1; 14 CCR 15064.5[a]).

In compliance with CEQA, the following properties containing built-environment resources were evaluated under the four CRHR criteria previously outlined, as well as local landmark criteria to determine eligibility for listing in the CRHR or NRHP, and accordingly, their historical significance:

- **7834 Victoria Avenue (APN 1192-281-10):** This property contained thirteen buildings including one single-family residence, two garages, eight sheds, and two horse barns. The easternmost building on the property is a heavily altered, one-story, irregular in plan residence constructed in 1927 according to the County Assessor. Extensive exterior alterations have been made to the property over time.
- **26432 6th Street (APN 1192-281-11):** This property contained nine buildings, including one single-family residence, one mobile home, three garages, three sheds, and one shade structure. The southernmost building on the property is a heavily altered, one-story, irregular in plan residence constructed in 1941 according to the County Assessor. Extensive exterior alterations have been made to the property over time.
- **7809 Grape Street (APN 1192-281-13):** This property contained four buildings including one single-family residence, one storage building, and two horse barns. The westernmost building on the property is a heavily altered, one-story, rectangular in plan residence constructed in 1950 according to the County Assessor. Extensive exterior alterations have been made to the property over time.

As detailed in Appendix C-1, neither 7834 Victoria Avenue (APN 1192-281-10), 26432 6th Street (APN 1192-281-11), nor 7809 Grape Street (APN 1192-281-13) property appear eligible for listing in the NRHP, CRHR, or City of Highland designation due to a lack of important historical associations, lack of architectural merit, and lack of integrity, nor do they appear eligible as contributors to an historic district. As such, these properties are not considered historical resources for the purposes of CEQA. These resources have been assigned a California Historical Resource Status Code of 6Z (found ineligible for the NRHP, CRHR, or local designation through survey evaluation).

No historical resources were identified within the project site as a result extensive archival research, field survey, and property significance evaluation. Only three parcel contained buildings which met the 45-year age threshold for evaluation, and neither appears eligible for NRHP, CRHR, or City of Highland designation due to a lack of significant historical associations, architectural merit, and requisite integrity to convey significance. Therefore, impacts associated with historical resources would be less than significant.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less-than-Significant Impact with Mitigation Incorporated. The proposed project site is relatively flat and generally slopes from east to west with a maximum site elevation of approximately 1,148± feet above mean sea level on the western side of the site. Soils within the proposed project site consist of both Hanford coarse sandy loam at 2 to 9% slopes typically found in stream bottoms, floodplains, and alluvial fans with slopes of 0 to 15%. Other soil types within the proposed project site includes the Tujunga gravelly loamy sand at 0 to 9% slopes typically found in alluvial fans and floodplains, including urban areas. The proposed project site is within the Upper Santa Ana River Watershed and originates in San Bernardino Mountains. The proposed project site is approximately 3 miles south and west of the San Bernardino Mountains and just northwest of an unnamed channel. The unnamed channel is an intermittent riverine system that flows only part of the year and travels north to south and connects to an unnamed drainage ditch that is located at the southwestern portion of the proposed project site. The ditch receives flow from a City storm drain at Victoria Avenue, as well as runoff from Victoria Avenue before discharging flows into a 48-inch corrugated metal pipe within 6th Street. This unnamed channel travels underground, approximately 0.25 miles south and presumably connects to City Creek, which is a direct tributary to the Santa Ana River. Given that the proposed project site is within the Santa Ana River Watershed and is northwest of an unnamed intermittent riverine system that connects to City Creek and 3 miles from a mountain range, there is a potential for the proposed project site to be buried in alluvial and flood deposits. Please refer to the Archaeological Resources Assessment report prepared for the Project (Appendix C-2) for an indepth discussion of the environmental and cultural setting and of natural and human disturbances to the Project site.

While the Native American Heritage Commission's (NAHC) Sacred Lands File (SLF) search (completed April 14, 2021) result was positive, it is important to note that the results of the SLF provided by the NAHC relate to the general regional area within and surrounding the proposed project site and don't necessarily equate to the existence of resources within the specific area occupied by the proposed project site. A review of the CHRIS records search (completed May 10, 2021) indicates that 13 previous cultural resource investigations have been conducted within the records search area between 1979 and 2013. Of these 13 studies, 1 study (SB-07959) encompasses the entirety of the current proposed project site; however, the study focuses on historic built environment resources and as such, the potential of archaeological resources was likely not considered during the survey. The entirety of the proposed project site has not been subject to any previous archaeological investigations. South Central Coastal Information Center records also indicate that 23 cultural resources, all of which are historic built environment resources, have been previously recorded within 0.5 miles of the proposed project site, none of which overlap or are adjacent to the proposed project site. No record of previously recorded historic-period or prehistoric archaeological resources are on file with the South Central Coastal Information Center as being present within proposed project site.

A review of aerial photographs for all available years indicates that in general, the proposed project site has been subjected to consistent ground disturbance, shifting from open land to agricultural and/or residential use between the early to late 20th century; however, Parcel 1 shifted to operating as a poultry farm between 1957 and the mid-1960s before reverting to residential use and Parcel 5 has remained open and undeveloped. Presently, Parcels 1–3 are developed with residential buildings and Parcels 4–6 are vacant.

An intensive-level archaeological pedestrian survey of the proposed project site was conducted on May 11, 2021 and June 15, 2021. Ground visibility within the proposed project site varied between poor to excellent

(30 to 100%) due to surface coverage by vegetation, surficial refuse, ground coverage by gravel and/or concrete pads, and extant buildings and associated structures. The pedestrian survey observations determined that the site was subjected to moderate disturbance throughout the site due to livestock activity, fencing, irrigation, and the storage of vehicles. Modern refuse, consisting of building/structural, vehicular, and domestic debris, was observed scattered across the proposed project site. A review of a geotechnical report prepared for the proposed project site (Appendix C-1), stated that fill soils were encountered from 12 to 18 inches (1 to 1.5 feet) below current grade within all 15 exploratory backhoe trenching locations conducted between 5 and 15.5 feet below current grade and placed at accessible locations throughout the proposed project site. Native soils were encountered underlying the fill soils and extend to the maximum depths reached during the geotechnical testing. The presence of fill soils demonstrates that native soils within which cultural deposits might exist in context could not have been observed during the survey; this fact demonstrates that the survey findings are less than reliable. No cultural materials were observed within the proposed project site.

In consideration of all these factors, the potential to encounter intact deposits containing archaeological resources within soils between the current grade and 18 inches below is unlikely. However, the potential for intact cultural deposits to exist within soils from 18 inches below current grade to the proposed depths of disturbance is possible. Given the proximity of the proposed project site to the San Bernardino Mountains, an unnamed channel, and City Creek (a tributary of the Santa Ana River), there is a potential for cultural materials within native soils. In the event that unanticipated archaeological resources are encountered during project implementation, impacts to these resources would be potentially significant. With the implementation of mitigation measure MM-CUL-1, that requires the development of a Cultural Resources Monitoring Plan, MM-CUL-2, that requires that all project construction personnel take the Workers Environmental Awareness Program training and MM-CUL-3, that requires the retention of a qualified archaeologist to address inadvertent discoveries, conduct a pedestrian survey of native soils once they are uncovered and to monitor ground disturbing activities within native soils as well as an inadvertent discovery clause, the potential for a substantial adverse change in the significance of an archaeological resource to occur is less than significant. Therefore, impacts would be less than significant with mitigation incorporated.

MM-CUL-1: Preparation of a Cultural Resources Monitoring Plan

A qualified archaeological principal investigator, meeting the Secretary of the Interior's Professional Qualification Standards, shall prepare a Cultural Resources Monitoring Plan (CRMP) in consultation with Tribes that requested consultation under AB 52. 2. The CRMP shall include a requirement for all construction personnel to complete a WEAP training prior to commencement of construction activities as outlined in MM-CUL-2. The CRMP shall stipulate the location and timing of archaeological and Native American monitoring based on MM-CUL-3. The qualified archaeologist principal investigator shall review engineering plans for the project to determine where ground disturbing activities will exceed the depths of artificial fill within the project site to determine the timing and locations of monitoring to be included in the CRMP. The CRMP shall include monitoring protocols to be carried out during project-related construction. The CRMP shall stipulate a Native American monitor, associated with any of the Tribes that have been consulted with under AB 52, be retained to monitor project-related ground disturbance stipulated in the CRMP. The CRMP shall contain an allowance that the qualified archaeologist principal investigator, based on observations of subsurface soil stratigraphy or other factors during initial grading, and in coordination with the Native American monitor(s) and the City, may reduce or discontinue monitoring as warranted if it is determined that the possibility of encountering archaeological or tribal cultural deposits is low. The CRMP shall outline the appropriate measures to be followed in the event

of unanticipated discovery of cultural and tribal cultural resources during program implementation, including that all ground disturbance within 60 feet of an unanticipated discovery shall cease until a treatment plan is developed by the qualified archaeologist principal investigator in coordination with the City and the Native American monitor(s) and which will consider the resources archaeological and tribal value. The CRMP shall identify avoidance as the preferred manner of mitigating impacts to cultural resources. The CRMP shall establish the criteria utilized to evaluate the significance (per CEQA) of the discoveries, methods of avoidance consistent with CEQA Guidelines Section 15126.4(b)(3), as well as identify the appropriate treatment to mitigate the effect of the project if avoidance of a significant resource is determined to be infeasible. The plan shall also require the preparation of a monitoring report following the completion of all ground disturbing activities for the project. The monitoring report will be submitted to the City for review and comment and a final copy will be filed at the SCCIC. The CRMP shall be submitted to the City and the appropriate Native American representatives who have been consulted with under AB 52 for review prior to the City's issuance of a grading permit and the start of project-related ground disturbance.

MM-CUL-2 All construction personnel and monitors who are not trained archaeologists shall be briefed regarding inadvertent discoveries prior to the start of construction activities. A basic presentation and handout or pamphlet shall be prepared in order to ensure proper identification and treatment of inadvertent discoveries. The purpose of the Workers Environmental Awareness Program (WEAP) training is to provide specific details on the kinds of archaeological materials that may be identified during construction of the project and explain the importance of and legal basis for the protection of significant archaeological resources. Each worker shall also learn the proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the site supervisor and archaeological monitor.

MM-CUL-3 A qualified archaeologist shall be retained and on-call to respond and address any inadvertent discoveries identified for the duration of construction activities. Additionally, in consideration of the potential to encounter intact cultural deposits beneath fill soils, the qualified archaeologist shall monitor ground disturbing activities between 12–18 inches below current grade and shall survey the project site once fill soils have been removed to ensure no cultural deposits underly the fill layer. A qualified archaeological principal investigator, meeting the Secretary of the Interior's Professional Qualification Standards, shall oversee and adjust monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) based on the observed potential for construction activities to encounter cultural deposits or material. The archaeological monitor will be responsible for maintaining daily monitoring logs.

In the event that potential prehistoric or historical archaeological resources (sites, features, or artifacts) are exposed during construction activities for the project, all construction work occurring within 60 feet of the find shall immediately stop and a qualified archaeologist must be notified immediately to assess the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find, the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work as outlined in the Cultural Resources Monitoring Plan (MM-CUL-1) may be warranted. If resources are determined to be tribal cultural resources in nature, MM-TCR-2 shall be implemented.

Within 60 days following completion of ground disturbance and submitted to the City for review. This report shall document compliance with approved mitigation, document the monitoring efforts, and include an appendix with daily monitoring logs. The final report shall be submitted to the South Central Coastal Information Center and interested consulting tribes.

c) ***Would the project disturb any human remains, including those interred outside of dedicated cemeteries?***

Less-than-Significant Impact with Mitigation Incorporated. No prehistoric or historic burials were identified within the proposed project site as a result of the CHRIS records search or pedestrian survey. Although the NAHC's SLF search result was positive, it is important to note that the results of the SLF provided by the NAHC relate to the general regional area within and surrounding the proposed project site and don't necessarily equate to the existence of resources or human remains within the specific area occupied by the proposed project site. In the event that human remains are inadvertently encountered during construction activities, such resources would be treated in accordance with state and local regulations that provide requirements with regard to the accidental discovery of human remains, including California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98, and the California Code of Regulations Section 15064.5(e). In accordance with these regulations, if human remains are found, the County Coroner must be immediately notified of the discovery. No further excavation or disturbance of the project site or any nearby area reasonably suspected to overlie adjacent remains can occur until the County Coroner has determined, within 2 working days of notification of the discovery, if the remains are potentially human in origin. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she is required to notify the NAHC within 24 hours. The NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant must then complete their inspection within 48 hours of being granted access to the site. The most likely descendant would then determine, in consultation with the property owner, the disposition of the human remains. Compliance with these regulations would ensure that impacts to human remains resulting from the proposed project would be less than significant.

3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy – Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

a) ***Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?***

Less-than-Significant Impact. The electricity and natural gas used for construction of the proposed project would be temporary, would be substantially less than that required for project operation, and would have a negligible contribution to the project's overall energy consumption. Although the project would see an increase in petroleum use during construction and operation, vehicles would use less petroleum due to advances in fuel economy and potential reduction in VMT over time.

Construction

Electricity

Temporary electric power for as-necessary lighting and electronic equipment (such as computers inside temporary construction trailers) would be provided by Southern California Edison. The electricity used for such activities would be temporary, would be substantially less than that required for project operation, and would have a negligible contribution to the project's overall energy consumption.

Natural Gas

Natural gas is not anticipated to be required during construction of the project. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed below under the Petroleum subsection. Any minor amounts of natural gas that may be consumed as a result of project construction would be substantially less than that required for project operation and would have a negligible contribution to the project's overall energy consumption.

Petroleum

Heavy-duty construction equipment associated with construction activities would rely on diesel fuel. Construction workers would travel to and from the project site throughout the duration of construction. It is assumed in this analysis that construction workers would travel to and from the site in gasoline-powered passenger vehicles.

Heavy-duty construction equipment of various types would be used during each phase of project construction. Appendix A-1 lists the assumed equipment usage for each phase of construction.

Fuel consumption from construction equipment was estimated by converting the total carbon dioxide (CO_2) emissions from each construction phase to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. Construction is estimated to occur in 2022 based on the construction phasing schedule. The conversion factor for gasoline is 8.78 kilograms per metric ton CO_2 per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton CO_2 per gallon (The Climate Registry 2020). The estimated diesel fuel usage from construction equipment is shown in Table 15.

Table 15. Construction Equipment Diesel Demand

Phase	Pieces of Equipment	Equipment CO_2 (MT)	kg/CO_2/Gallon	Gallons
Demolition	4	34.23	10.21	3,352.49
Site Preparation	7	16.86	10.21	1,650.82

Table 15. Construction Equipment Diesel Demand

Phase	Pieces of Equipment	Equipment CO_2 (MT)	kg/CO_2/Gallon	Gallons
Grading	8	82.46	10.21	8,076.71
Building Construction	9	97.91	10.21	9,589.36
Paving	6	20.19	10.21	1,977.42
Architectural Coating	1	2.56	10.21	250.48
			Total	24,897.29

Sources: Pieces of equipment and equipment CO_2 (Appendix A-1); kg/CO_2/Gallon (The Climate Registry 2020).
Notes: CO_2 = carbon dioxide; MT = metric ton; kg = kilogram.

Fuel consumption from worker and vendor trips is estimated by converting the total CO_2 emissions from each construction phase to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. Worker vehicles are assumed to be gasoline and vendor vehicles are assumed to be diesel. The project also includes haul truck trips for the export of demolition waste and import of earthwork materials. Calculations for total worker, vendor truck and haul truck fuel consumption are provided in Table 16.

Table 16. Construction Worker and Vendor Gasoline and Diesel Demand

Phase	Trips	Vehicle MT CO_2	kg/CO_2/Gallon	Gallons
Worker (Gasoline)				
Demolition	320	1.41	8.78	160.74
Site Preparation	180	0.79	8.78	90.41
Grading	600	2.65	8.78	301.38
Building Construction	18,816	82.98	8.78	9,451.22
Paving	320	1.41	8.78	160.74
Architectural Coating	920	4.06	8.78	462.12
Vendor (Diesel)				
Demolition	0	0.00	10.21	0.00
Site Preparation	0	0.00	10.21	0.00
Grading	0	0.00	10.21	0.00
Building Construction	7,392	70.12	10.21	6,867.83
Paving	0	0.00	10.21	0.00
Architectural Coating	0	0.00	10.21	0.00
Haul (Diesel)				
Demolition	114	3.47	10.21	340.14
Site Preparation	0	0.00	10.21	0.00
Grading	20	0.61	10.21	59.68
Building Construction	0	0.00	10.21	0.00
Paving	0	0.00	10.21	0.00
Architectural Coating	0	0.00	10.21	0.00
			Total	42,792

Sources: Trips and vehicle CO2 (Appendix A-1); kg/CO2/Gallon (The Climate Registry 2020).
Notes: MT = metric ton; CO2 = carbon dioxide; kg = kilogram.

In summary, construction of the project is anticipated to consume 10,627 gallons of gasoline and 32,165 gallons of diesel over the course of 9 months. The project will be subject to CARB's In-Use Off-Road Diesel Vehicle Regulation that applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulation: (1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; (2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System) and labeled; (3) restricts the adding of older vehicles into fleets starting on January 1, 2014; and 4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines, or installing Verified Diesel Emission Control Strategies (i.e., exhaust retrofits). The fleet must either show that its fleet average index was less than or equal to the calculated fleet average target rate, or that the fleet has met the Best Achievable Control Technology requirements. The project is also located in an urban area and worker, vendor, and haul truck trip lengths would be shorter compared to a suburban project location, resulting in less energy use. Therefore, impacts to energy resources during construction would be less than significant.

Operation

Electricity

The operation of the project would require electricity for multiple purposes, including cooling, lighting, appliances, and powering various equipment, such as electric forklifts. Additionally, the supply, conveyance, treatment, and distribution of water would indirectly result in electricity usage. Electricity consumption associated with project operation is based on the CalEEMod outputs and spreadsheet calculations for water, wastewater, and electric forklifts presented in Appendix A-1.

CalEEMod default values for energy consumption for each land use were applied for the project analysis. The energy use from non-residential land uses is calculated in CalEEMod based on the California Commercial End-Use Survey database. Energy use in buildings (both natural gas and electricity) is divided by the program into end use categories subject to Title 24 requirements (end uses associated with the building envelope, such as the heating, ventilation, and air conditioning [HVAC] system; water heating system; and integrated lighting) and those not subject to Title 24 requirements (such as appliances, electronics, and miscellaneous "plug-in" uses).

Title 24 of the California Code of Regulations serves to enhance and regulate California's building standards. The most recent amendments to Title 24, Part 6, referred to as the 2019 standards, became effective on January 1, 2020. According to these estimations, the project would consume approximately 1,926,577 kilowatt-hours per year during operation (Appendix A-1).

Natural Gas

The operation would require natural gas for various purposes, including water heating and natural gas appliances and natural gas forklifts. Natural gas consumption associated with operation is based on the CalEEMod outputs in Appendix A-1.

CalEEMod default values for energy consumption for each land use were applied for the project analysis. The energy use from non-residential land uses is calculated in CalEEMod based on the California Commercial End-Use Survey database. Energy use in buildings (both natural gas and electricity) is divided by the program into end use categories subject to Title 24 requirements (end uses associated with the

building envelope, such as the HVAC system, water heating system, and integrated lighting) and those not subject to Title 24 requirements (such as appliances, electronics, and miscellaneous "plug-in" uses).

Title 24 of the California Code of Regulations serves to enhance and regulate California's building standards. The most recent amendments to Title 24, Part 6, referred to as the 2019 standards, became effective on January 1, 2020. According to these estimations, the project would consume approximately 617,932 thousand British thermal units per year.

Petroleum

During operations, the majority of fuel consumption resulting from the project would involve the use of forklifts and motor vehicles traveling to and from the project site.

Petroleum fuel consumption associated with motor vehicles traveling to and from the project site is a function of the VMT as a result of project operation. As shown in Appendix A-1 (calculation spreadsheets) and as discussed in Section 3.3 and Section 3.8, the annual VMT attributable to the project is expected to be 2,350,892 miles for passenger vehicles and 2,146,200 miles for trucks. Similar to the construction worker and vendor trips, fuel consumption from worker and truck trips are estimated by converting the total CO_2 emissions from operation of the project to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. Mobile source emissions were estimated using EMFAC2021. Calculations for annual mobile source fuel consumption are provided in Table 17.

Table 17. Operational Annual Mobile Source Petroleum Demand

Fuel	Source	Vehicle MT CO_2	kg/CO_2/Gallon	Gallons
Gasoline	Vehicles	722.63	8.78	82,304.10
Diesel	Vehicles	3,126.07	10.21	306,177.28
Diesel	Forklifts	369.58	10.21	36,197.85
			Total	**424,679.22**

Sources: Trips and vehicle CO_2 (Appendix A-1); kg/CO_2/Gallon (The Climate Registry 2020).
Notes: MT = metric ton; CO_2 = carbon dioxide; kg = kilogram

As shown in Table 17, total petroleum consumption for the project annually is estimated to be 424,679 gallons.[20]

Summary

In summary, although natural gas and electricity usage would increase due to the implementation of the project, the project would be subject to the State Building Energy Efficiency Standards. Although the project would see an increase in petroleum use during construction and operation, vehicles would use less petroleum due to advances in fuel economy and potential reduction in VMT over time. Therefore, impacts to energy resources during operation would be less than significant.

Over the lifetime of the project, the fuel efficiency of the vehicles being used by the visitors and employees of the project is expected to increase. As such, the amount of gasoline consumed as a result of vehicular trips to and from the project site during operation would decrease over time. There are numerous regulations in place that require and encourage increased fuel efficiency. For example, CARB has adopted

[20] For context, California as a whole is expected to consume approximately 18.0 billion gallons of petroleum per year by 2023 (CARB 2021). Countywide total petroleum use by vehicles is expected to be 123.71 million gallons per year by 2023 (CARB 2021).

a new approach to passenger vehicles by combining the control of smog-causing pollutants and GHG emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the number of plug-in hybrids and zero-emission vehicles in California (CARB 2017a). Additionally, in response to Senate Bill (SB) 375, CARB has adopted the goal of reducing per-capita GHG emissions from 2005 levels by 8% by the year 2020 and 13% by the year 2035 for light-duty passenger vehicles in the SCAG planning area. This reduction would occur by reducing VMT through the integration of land use planning and transportation. As such, operation of the project is expected to use decreasing amounts of petroleum over time, due to advances in fuel economy.

The project would create additional electricity and natural gas demand by adding warehouse facilities. New facilities associated with the proposed project would be subject to the State Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations. The efficiency standards apply to new construction of non-residential buildings and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting.

In summary, implementation of the project would increase the demand for electricity and natural gas at the project site and petroleum consumption in the region during construction and operation. However, as the project would be consistent with current regulations and policies, the project would not be wasteful, inefficient, and would not result in unnecessary energy resource consumption. The project's energy consumption demands during construction and operation would conform to the State's Title 24 standards such that the project would not be expected to wastefully use gas and electricity. Since the proposed project would comply with Title 24 conservation standards, the proposed project would not directly require the construction of new energy generation or supply facilities or result in wasteful, inefficient, or unnecessary consumption of energy. Moreover, vehicle usage associated with the project would use less petroleum due to advances in fuel economy and potential reduction in VMT over time. Therefore, impacts would be less than significant.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less-than-Significant Impact. The project would be subject to and would comply with, at a minimum, the California Building Energy Efficiency Standards (24 CCR, Part 6). Part 6 of Title 24 establishes energy efficiency standards for non-residential buildings constructed in California to reduce energy demand and consumption. As such, the project would comply with the California code requirements for energy efficiency.

Part 11 of Title 24 sets forth voluntary and mandatory energy measures that are applicable to the project under the California Green Building Standards, also known as CALGreen. CALGreen institutes mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, high-rise residential, state-owned buildings, schools, and hospitals, as well as certain residential and non-residential additions and alterations. On this basis, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, impacts would be less than significant.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative 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) ***Would the project 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.***

No Impact. The Alquist-Priolo Zones Special Studies Act defines active faults as those that have experienced surface displacement or movement during the last 11,000 years. As shown in Figure 6-2 of the General Plan, the City of Highland is traversed by the San Andreas Fault System (City of Highland 2006). The Alquist-Priolo Earthquake Fault Zone, as identified in the General Plan, is located 2.3 miles east of the project site (City of Highland 2006). The proposed development lies outside of any Alquist Priolo Special Studies Zone and the potential for damage due to direct fault rupture is considered unlikely (Appendix D-1, Geotechnical Investigation). Additionally, based on a review of the CDOC regulatory maps, the project site is not located in a designated Fault Hazard Zone (CDOC 2021). Therefore, no impacts associated with fault rupture would occur.

ii) ***Strong seismic ground shaking?***

Less-than-Significant Impact. Similar to other areas located in the seismically active Southern California region, the City is susceptible to strong ground shaking during an earthquake. However, as previously addressed in Section 3.7(a)(i), the project site is located approximately 2.3 miles west of the San Andreas Fault Zone which is capable of producing an 8.3 Magnitude earthquake (City of Highland 2006). Pursuant to Title 15, Buildings and Construction, of the Highland Municipal Code, the project would incorporate the design recommendations included in its geotechnical report, which will be subject to review and approval by City staff prior to issuance of a grading permit. The project's geotechnical report provides specific design recommendations to ensure the structural integrity of the project in the event that seismic ground shaking is experienced at the project site. These recommendations include performing remedial grading, over-excavating existing soils, and recompacting these soils with structured fill, among other technical design recommendations (Appendix D-1). Additionally, the project's structures would be designed consistent with the most recent version of the California Building Code, which includes universal standards relating to seismic load requirements. With implementation of the recommendations of the project's geotechnical report, impacts associated with strong seismic ground shaking would be less than significant.

iii) ***Seismic-related ground failure, including liquefaction?***

Less-than-Significant Impact. Liquefaction occurs when partially saturated soil loses its effective stress and enters a liquid state, which can result in the soil's inability to support structures above. Liquefaction can be induced by ground-shaking events and is dependent on soil saturation conditions. As shown in Figure 6-3 of the General Plan, the project site is not within a High Liquefaction Susceptibility Area (City of Highland 2006), and according to the project's Geotechnical Report, liquefaction is not a concern for the project site (Appendix D-1).

The project would involve the installation of an infiltration basin to capture, treat, and infiltrate stormwater flows on the site. A detailed Infiltration Study (Appendix D-2) was prepared to evaluate the suitability of the site for such a system, taking into account the characteristics of on-site soils. The infiltration study determined that the site is suitable for stormwater infiltration without increasing the potential for settlement of both proposed and existing structures (e.g., Grape Street and retaining/basement walls adjacent to the

project site) in the project area. Therefore, impacts associated with seismic-related ground failure, including liquefaction, would be less than significant.

iv) Landslides?

No Impact. The project site is relatively flat and is not within an area susceptible to landslides as shown in General Plan Figure 6-3 (City of Highland 2006). Therefore, no impact associated with landslides would occur on the proposed project site.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Short-Term Construction Impacts

Less-than-Significant Impact. Ground surfaces that would be temporarily exposed during construction could result in erosion or loss of soil during storm events. Construction projects that involve the disturbance of 1 or more acres of soil, including clearing, grading, and disturbances to the ground such as stockpiling or excavation, are required to obtain coverage under the State Water Resources Control Board General Permit for Discharges of Stormwater Associated with Construction Activity (Construction General Permit). The Construction General Permit requires the development and implementation of a SWPP (SWRCB 2021a). Implementation of a Construction General Permit, including preparation of a SWPPP and installation of BMPs, would reduce the potential for both stormwater runoff and soil erosion impacts. Therefore, short-term construction impacts associated with soil erosion would be less than significant.

Long-Term Operational Impacts

Less-than-Significant Impact. Following construction of the project, ground surfaces would be covered by the proposed warehouse building or otherwise stabilized with landscaping and paving. The stormwater generated on site, along with any sediments contained within the stormwater, will be directed into an on-site corrugated metal pipe (CMP) infiltration system to be treated on site. Therefore, the potential for substantial soil erosion or the loss of topsoil is considered less than significant.

c) Would the project 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?

Less-than-Significant Impact. As previously discussed, the potential for the project to result in or be affected by landslides and liquefaction is low, and these issues are not anticipated at the project site. The project would be designed consistent with the specific design recommendations of the project's geotechnical report, which provides recommendations to perform remedial grading, over-excavate existing soils, and recompact these soils with structured fill, among other technical design recommendations (Appendix D-1). Implementation of these recommendations would address these potentially hazardous conditions and ensure structural integrity in the event that seismic-related issues are experienced at the project site. With implementation of the recommendations of the project's geotechnical report, impacts would be less than significant.

d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less-than-Significant Impact. Expansive soils are characterized by their potential shrink/swell behavior. Shrink/swell is the change in volume (expansion and contraction) that occurs in certain fine-grained clay sediments from the cycle of wetting and drying. Much of the damage to building foundations, roads, and other structures can be caused by the swelling and shrinking of soils as a result of wetting and drying. The upper soils at the project site are very low (Expansion Index=0-20) in expansion potential (Appendix D-1). Further, compliance with California Building Code requirements would reduce the potential risk to people and structures due to unstable and expansive soils. Therefore, impacts associated with expansive soils would be less than significant.

e) Would the project 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?

No Impact. The proposed project would connect directly to the municipal sanitary sewer system and would not require septic tanks or any other alternative wastewater disposal system. Therefore, no impacts associated with the ability of soils to support septic tanks would occur.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less-than-Significant Impact with Mitigation Incorporated. The geologic units underlying the project site as primarily fill soils encountered at the ground surface. The fill soils generally consist of silty sand with some gravel, rocks, and minor debris. Native soils generally consisting of silty sand with some gravel and occasional cobbles were encountered beneath the upper fill soils (Appendix D-1). As is the case with most development projects that involve earthwork activity, there is always a possibility that subsurface construction activity could unearth a potentially significant paleontological resource. MM-GEO-1 would be required to ensure that subsurface construction activity complies with the standard procedures for treatment of unanticipated discovered of paleontological resources; therefore, with incorporation of mitigation, impacts associated with paleontological resources would be less than significant.

MM-GEO-1 **Discovery of Paleontological Resources.** In the event that paleontological resources (i.e., fossil remains) are exposed during construction activities for the project, all construction work occurring within 50 feet of the find shall immediately stop until a qualitied paleontologist, as defined by the Society of Vertebrate Paleontology's guidelines, can assess the nature and importance of the find. Depending on the significance of the find, the qualified paleontologist may record the find and allow work to continue or may recommend salvage and recovery of the resource. All recommendations shall be made in accordance with the Society of Vertebrate Paleontology's guidelines and shall be subject to review and approval by the City of Highland. Work in the area of the find may only resume upon approval of a qualified paleontologist.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

a) ***Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***

Less-than-Significant Impact. Climate change refers to any significant change in measures of climate (e.g., temperature, precipitation, or wind patterns) lasting for an extended period of time (i.e., decades or longer). The Earth's temperature depends on the balance between energy entering and leaving the planet's system, and many factors (natural and human) can cause changes in Earth's energy balance. The greenhouse effect is the trapping and buildup of heat in the atmosphere near the Earth's surface (the troposphere). The greenhouse effect is a natural process that contributes to regulating the Earth's temperature, and it creates a livable environment on Earth. Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise. Global climate change is a cumulative impact; a project contributes to this impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. Thus, GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2008).

A GHG is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. As defined in California Health and Safety Code Section 38505(g) for purposes of administering many of the state's primary GHG emissions reduction programs, GHGs include CO_2, methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride (see also CEQA Guidelines Section 15364.5).[21] The three GHGs evaluated herein are CO_2, CH_4, and N_2O because these gases would be emitted during project construction and operation.

The Intergovernmental Panel on Climate Change developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The reference gas used is CO_2; therefore, GWP-weighted emissions are measured in metric tons (MT) of CO_2 equivalent (CO_2e). Consistent with CalEEMod Version 2020.4.0, this GHG emissions analysis assumed the GWP for CH_4 is 25

21 Climate-forcing substances include greenhouse gases (GHGs) and other substances such as black carbon and aerosols. This discussion focuses on the seven GHGs identified in the California Health and Safety Code Section 38505; impacts associated with other climate-forcing substances are not evaluated herein.

(i.e., emissions of 1 MT of CH_4 are equivalent to emissions of 25 MT of CO_2), and the GWP for N_2O is 298, based on the Intergovernmental Panel on Climate Change's Fourth Assessment Report (IPCC 2007).

As discussed in Section 3.3, the project is located within SCAQMD jurisdictional boundaries. In October 2008, the SCAQMD proposed recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects as presented in its Draft Guidance Document—Interim CEQA Greenhouse Gas (GHG) Significance Threshold (SCAQMD 2008b). This document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association, explored various approaches for establishing a significance threshold for GHG emissions. The draft interim CEQA thresholds guidance document was not adopted or approved by the Governing Board. However, in December 2008, the SCAQMD adopted an interim 10,000 MT CO_2e per-year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency (SCAQMD 2008b). The 10,000 MT CO_2e per-year threshold, which was derived from GHG reduction targets established in Executive Order (EO) S-3-05, was based on the conclusion that the threshold was consistent with achieving an emissions capture rate of 90% of all new or modified stationary source projects.

The SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with SCAQMD staff on developing GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. From December 2008 to September 2010, the SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. The SCAQMD has continued to consider adoption of significance thresholds for residential and general land-use development projects. The most recent proposal issued by SCAQMD, issued in September 2010, uses the following tiered approach to evaluate potential GHG impacts from various uses (SCAQMD 2010):

Tier 1. Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.

Tier 2. Consider whether or not the project is consistent with a locally adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.

Tier 3. Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MT CO_2e per-year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MT CO_2e per year), commercial projects (1,400 MT CO_2e per year), and mixed-use projects (3,000 MT CO_2e per year). Under option 2, a single numerical screening threshold of 3,000 MT CO_2e per year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.

Construction Greenhouse Gas Emissions

Construction of the project would result in GHG emissions, which are primarily associated with the use of off-road construction equipment, on-road haul and vendor trucks, and worker vehicles. The SCAQMD Draft Guidance Document - Interim CEQA Greenhouse Gas (GHG) Significance Threshold (SCAQMD 2008b) recommends that "construction emissions be amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies." Thus, the total construction GHG emissions were calculated, amortized over 30 years, and

added to the total operational emissions for comparison with the GHG significance threshold of 10,000 MT CO_2e per year. The determination of significance, therefore, is addressed in the operational emissions discussion following the estimated construction emissions.

CalEEMod was used to calculate the annual GHG emissions based on the construction scenario described in Section 3.3. Construction of the project is anticipated to commence in February 2022, lasting a total of 9 months and reaching completion in October 2022. On-site sources of GHG emissions include off-road equipment and off-site sources include haul trucks, vendor trucks, and worker vehicles. Table 18 presents construction GHG emissions for the project from on-site and off-site emission sources.

Table 18. Estimated Annual Construction Greenhouse Gas Emissions

Year	CO_2	CH_4	N_2O	CO_2e
	Metric Tons per Year			
2022	415.86	0.08	0.01	421.71
			Total	**421.71**
			Amortized Emissions (over 30 years)	**14.06**

Source: Appendix A-1.
Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent.

As shown in Table 18, the estimated total GHG emissions during construction of the project would be approximately 422 MT CO_2e. Estimated project-generated construction emissions amortized over 30 years would be approximately 14 MT CO_2e per year. As with project-generated construction air quality pollutant emissions, GHG emissions generated during construction of the project would be short-term in nature, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions. Because there is no separate GHG threshold for construction, the evaluation of significance is discussed in the operational emissions analysis in the following text.

Operational Greenhouse Gas Emissions

CalEEMod Version 2020.4.0 was used to estimate potential project-generated operational GHG emissions from area sources (landscape maintenance), natural gas combustion, electrical generation, water supply and wastewater treatment, solid waste, and off-road equipment (forklifts). As with the air quality analysis, mobile source GHG emissions were estimated using a spreadsheet model based on EMFAC2021 emission factors. Emissions from each category—area sources, energy sources, mobile sources, solid waste, water supply and wastewater treatment, and off-road equipment—are discussed in the following text with respect to the project. For additional details, see Section 3.3 for a discussion of operational emission calculation methodology and assumptions, specifically for area, energy (natural gas), and mobile sources. Operational year 2023 was assumed to be the first full year of operation following completion of construction.

Area Sources

CalEEMod was used to estimate GHG emissions from the project's area sources, including operation of gasoline-powered landscape maintenance equipment, which produce minimal GHG emissions. It was assumed that 100% of the landscaping equipment would be gasoline powered. Consumer product use and architectural coatings result in VOC emissions, which are analyzed in air quality analysis only, and low to no GHG emissions.

Energy Sources

The estimation of operational energy emissions was based on CalEEMod land use defaults and square footage of the project's land uses. For non-residential buildings, CalEEMod energy intensity value (electricity or natural gas usage per square foot per year) assumptions were based on the California Commercial End-Use Survey database. Emissions are calculated by multiplying the energy use by the utility carbon intensity (pounds of GHGs per kilowatt-hour for electricity or 1,000 British thermal units for natural gas) for CO_2 and other GHGs.

The current Title 24, Part 6 standards, referred to as the 2019 Title 24 Building Energy Efficiency Standards, became effective on January 1, 2020. The current version of CalEEMod assumes compliance with the 2019 Title 24 Building Energy Efficiency Standards (CAPCOA 2021).

The CalEEMod default energy intensity factor (CO_2, CH_4, and N_2O mass emissions per kilowatt-hour) for Southern California Edison is based on the value for Southern California Edison's energy mix in 2020 reported in 2021. The Southern California Edison energy use intensity factor was adjusted consistent with SCE's 2020 Corporate Sustainability Report, which reported that 34.2% of the power mix was generated by eligible renewable sources in 2020 (SCE 2021). SB X1 2 established a target of 33% from renewable energy sources for all electricity providers in California by December 31, 2020, and SB 100 calls for further development of renewable energy, with a target of 44% by December 31, 2024; 52% by December 31, 2027; and 60% by December 31, 2030. As such, GHG emissions associated with project electricity demand would continue to decrease over time.

Mobile Sources

All details for criteria air pollutants discussed in Section 3.3 are also applicable for the estimation of operational mobile source GHG emissions. It was assumed that the warehouse would operate 7 days per week; therefore, 365 days of vehicle emissions were assumed. Regulatory measures related to mobile sources include Assembly Bill (AB) 1493 (Pavley) and related federal standards. AB 1493 required that CARB establish GHG emission standards for automobiles, light-duty trucks, and other vehicles determined by CARB to be vehicles that are primarily used for noncommercial personal transportation in the state. In addition, the National Highway Traffic Safety Administration and EPA have established corporate fuel economy standards and GHG emission standards, respectively, for automobiles and light-, medium-, and heavy-duty vehicles. Implementation of these standards and fleet turnover (replacement of older vehicles with newer ones) will gradually reduce emissions from the project's motor vehicles. The effectiveness of fuel economy improvements was evaluated to the extent it was captured in the EMFAC2021 emission factors for motor vehicles in 2023.

The Advanced Clean Trucks Regulation was approved by CARB in 2020. The purpose of the Advanced Clean Trucks Regulation is to accelerate the market for zero-emission vehicles in the medium- and heavy-duty truck sector and to reduce air pollutant emissions generated from on-road mobile sources (CARB 2020). The regulation has two components including a (1) manufacturer sales requirement and (2) a reporting requirement:

1. Zero-emission truck sales: Manufacturers who certify Class 2b-8 chassis or complete vehicles with combustion engines will be required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales would

need to be 55% of Class 2b – 3 truck sales, 75% of Class 4 – 8 straight truck sales, and 40% of truck tractor sales.

2. Company and fleet reporting: Large employers including retailers, manufacturers, brokers and others will be required to report information about shipments and shuttle services. Fleet owners, with 50 or more trucks, will be required to report about their existing fleet operations. This information will help identify future strategies to ensure that fleets purchase available zero-emission trucks and place them in service where suitable to meet their needs.

Solid Waste

The project would generate solid waste and therefore, would result in CO_2e emissions associated with landfill off-gassing. CalEEMod default values for solid waste generation were used to estimate GHG emissions associated with solid waste.

Water and Wastewater

Supply, conveyance, treatment, and distribution of water for the project require the use of electricity, which would result in associated indirect GHG emissions. Similarly, wastewater generated by the project requires the use of electricity for conveyance and treatment, along with GHG emissions generated during wastewater treatment. Water consumption estimates for both indoor and outdoor water use and associated electricity consumption from water use and wastewater generation were estimated using CalEEMod default values.

Off-Road Equipment

The SCAQMD published a summary of operational survey results from 34 operating high-cube warehouses (SCAQMD 2014). The SCAQMD survey reported an average of 0.12 forklifts/pallet jacks per 1,000 square feet of building area, which was applied to the project. Note that this estimate is for total forklifts and pallet jacks. Pallet jacks are small as they are primarily used to lift small loads in tight quarters (and are electric or manual); therefore, assuming all pieces of equipment are forklifts is conservative. For the project, a total of 35 forklifts were assumed. Of the total 35 forklifts, 15 of the forklifts were modeled as diesel powered with Tier 4 Interim compliant engines. The remaining 20 forklifts are assumed to be electric-operated. All 35 forklifts are assumed to operate 8 hours per day and 7 days per week at the project site. CalEEMod was used to estimate emissions from diesel powered forklifts while spreadsheet model was used to estimate the energy consumption and GHG emissions from the electric forklifts, see Appendix A-1.

The estimated operational (year 2023) project-generated GHG emissions from area sources, energy usage, motor vehicles, solid waste generation, water usage and wastewater generation, and off-road equipment are shown in Table 19.

Table 19. Estimated Annual Operational Greenhouse Gas Emissions

Emission Source	CO_2	CH_4	N_2O	CO_2e
	metric tons per year			
Area	0.01	<0.01	0.00	0.01
Energy	202.53	0.01	<0.01	203.39
Mobile	3,709.38	0.14	0.46	3,848.70
Solid waste	58.66	3.47	0.00	145.33

Table 19. Estimated Annual Operational Greenhouse Gas Emissions

Emission Source	CO_2	CH_4	N_2O	CO_2e
	metric tons per year			
Water supply and wastewater	236.69	2.33	0.06	311.75
Off-road equipment (Diesel Forklifts)	366.62	0.12	0.00	369.58
Off-road equipment (Electric Forklifts)	71.19	<0.01	<0.01	71.52
			Project Total	**4,950.28**
			Amortized Construction Emissions	*14.06*
			Operation + Amortized Construction Total	**4,964.34**

Source: Appendix A-1.
Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent.

As shown in Table 19, estimated annual generated GHG emissions would be approximately 4,950 MT CO_2e per year as a result of project operation. Estimated annual project-generated operational emissions in 2023 and amortized project construction emissions of approximately 14 MT CO_2e per year would be approximately 4,964 MT CO_2e per year. Annual operational GHG emissions with amortized construction emissions would not exceed the SCAQMD recommended threshold of 10,000 MT CO_2e per year.

b) Would the project generate conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less-than-Significant Impact. The project would result in less-than-significant impacts related to conflicts with GHG emission reduction plans, for the reasons described as follows.

Potential to Conflict with the San Bernardino County Regional GHG Reduction Plan

The San Bernardino Council of Governments (SBCOG) adopted a Regional GHG Reduction Plan in March 2021 (SBCOG 2021). The GHG Reduction Plan compiled an inventory of GHG emissions and developed reduction measures that could be adopted by the 21 Partnership cities of San Bernardino County. The regional GHG Reduction Plan serves as the basis for cities in the County to develop a more detailed community or local level climate action plan. As discussed in the GHG Reduction Plan, The City of Highland selected a goal to reduce its community GHG emissions to a level that is 40% below its 2016 emissions by 2030. The City will meet and exceed this goal subject to reduction measures that are technologically feasible and cost-effective through a combination of state (approximately 70%) and local (approximately 30%) efforts. The Pavley vehicle standards, the state's low carbon fuel standard, the renewable portfolio standard, and other state measures will reduce GHG emissions in Highland's on-road, solid waste, and building energy sectors in 2030. However, the City of Highland has not adopted a local climate action plan. Nonetheless, the project would comply with or not prevent the City from pursuing the relevant GHG reduction measures and regulations outlined in the Regional GHG reduction Plan, including compliance with applicable Title 24 building standards, and compliance with the City's off-road equipment idling ordinance. The Regional GHG Reduction Plan is not a qualified GHG reduction plan under CEQA Guidelines Section 15183.5. Therefore, this discussion is for informational purposes only and is not determinative of significance

Potential to Conflict with the CARB Scoping Plan

The Climate Change Scoping Plan, approved by CARB in 2008 and updated in 2014 and 2017, provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. The Scoping Plan is not directly applicable to specific projects, and it is not intended to be used for project-level evaluations.[22] Under the Scoping Plan, however, several state regulatory measures aim to identify and reduce GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area-source emissions (e.g., energy usage and high-GWP GHGs in consumer products) and changes to the vehicle fleet (e.g., hybrid, electric, and more fuel-efficient vehicles) and associated fuels, among others. Nonetheless, the project would comply with various GHG emission reduction regulations to the extent they apply to the project's emissions sources including CARB's tractor-trailer GHG regulations and Heavy-Duty Greenhouse Gas Standards for New Vehicle and Engines.

Potential to Conflict with the Southern California Association of Governments 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy

The SCAG 2020–2045 RTP/SCS (Connect SoCal) is a regional growth management strategy that targets per capita GHG reduction from passenger vehicles and light trucks in the Southern California Region pursuant to SB 375. In addition to demonstrating the Region's ability to attain the GHG emission-reduction targets set forth by CARB, the 2020-2045 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2020-2045 RTP/SCS would result in more complete communities with various transportation and housing choices while reducing automobile use.

The following strategies are intended to be supportive of implementing the 2020-2045 RTP/SCS and reducing GHGs: focus growth near destinations and mobility options; promote diverse housing choices; leverage technology innovations; support implementation of sustainability policies; and promote a green region (SCAG 2020). The strategies that pertain to residential development and SCAG's support of local jurisdiction sustainability efforts would not apply to the project. The project's potential to conflict with the remaining applicable strategies is presented in the following text.

Focus Growth Near Destinations and Mobility Options. One of the strategies within the 2020–2045 RPT/SCS's focuses on growth near existing transit and implementation of first/last mile strategies. The project would not conflict with this strategy of the 2020–2045 RTP/SCS as the project is located within 4.4 miles to the San Bernardino Transit Center. Omnitrans provides public transportation throughout the San Bernardino Valley and would serve as the nearest transit service to the project site. The nearest Omnitrans bus stop serves Route 15, located approximately 0.30 miles north of the project site at the intersection of Victoria Avenue/9th Street. Route 15 operates between the Fontana Metrolink Transit Center and the City of Redlands via the Cities of Rialto, San Bernardino, and Highland, with a peak service frequency of 60 minutes throughout the week

22 The Final Statement of Reasons for the amendments to the CEQA Guidelines reiterates the statement in the Initial Statement of Reasons that "[t]he Scoping Plan may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan" (CNRA 2009).

Leverage Technology Innovations. One of the technology innovations identified in the 2020–2045 RTP/SCS that would apply to the project is the promotion and support of low emission technologies for transportation, such as alternative fueled vehicles to reduce per capita GHG emissions. The project would not conflict with SCAG's ability to implement this strategy.

Promote a Green Region. The third applicable strategy within the 2020–2045 RTP/SCS, for individual developments, such as the project, involves promoting a green region through efforts such as supporting local policies for renewable energy production and promoting more resource efficient development (e.g., reducing energy consumption) to reduce GHG emissions. The project would support this measure by complying with the 2019 title 24 building standards.

Based on the analysis above, the project would be consistent with the SCAG 2020–2045 RTP/SCS.

Potential to Conflict with Senate Bill 32 and Executive Order S-3-05

Regarding consistency with SB 32 (goal of reducing GHG emissions to 40% below 1990 levels by 2030) and Executive Order S-3-05 (goal of reducing GHG emissions to 80% below 1990 levels by 2050), there are no established protocols or thresholds of significance for that future-year analysis. However, CARB has expressed optimism about both the 2030 and 2050 goals. It states in the First Update to the Climate Change Scoping Plan: Building on the Framework that "California is on track to meet the near-term 2020 GHG emissions limit and is well-positioned to maintain and continue reductions beyond 2020 as required by AB 32" (CARB 2014). Regarding the 2050 target for reducing GHG emissions to 80% below 1990 levels, CARB (2014) states the following:

> This level of reduction is achievable in California. In fact, if California realizes the expected benefits of existing policy goals (such as 12,000 megawatts of renewable distributed generation by 2020, net zero energy homes after 2020, existing building retrofits under Assembly Bill 758, and others) it could reduce emissions by 2030 to levels squarely in line with those needed in the developed world and to stay on track to reduce emissions to 80% below 1990 levels by 2050. Additional measures, including locally-driven measures and those necessary to meet federal air quality standards in 2032, could lead to even greater emission reductions.

In other words, CARB believes that the state is on a trajectory to meet the 2030 and 2050 GHG reduction targets set forth in AB 32, SB 32, and Executive Order S-3-05. This is confirmed in the 2017 Climate Change Scoping Plan Update, which states (CARB 2017b):

> The Scoping Plan builds upon the successful framework established by the Initial Scoping Plan and First Update, while identifying new, technologically feasible and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities.

In addition, the specific path to compliance for the state in regards to the long-term, future goals will likely require development of new technology or other changes that are not currently known or available. As such, identifying ways that the project would be consistent with future goals would be speculative and cannot be meaningfully discussed at this time. However, the proposed project's consistency with current goals, policies, and regulations would assist in meeting the City's contribution to GHG emission reduction targets

in California. With respect to future GHG targets under SB 32 and EO S-3-05, CARB has also made clear its legal interpretation that it has the requisite authority to adopt whatever regulations are necessary, beyond the AB 32 horizon year of 2020, to meet the SB 32 40 percent reduction target by 2030 and the EO S-3-05 80 percent reduction target by 2050. This legal interpretation by an expert agency provides evidence that future regulations will be adopted to continue the trajectory toward meeting these future GHG targets.

Based on the above considerations, the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. This impact would be less than significant, and no mitigation is required.

3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	X☐	☐	☐
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 that 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?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

a) ***Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?***

Short-Term Construction Impacts

In December 2020, a Phase I ESA and Limited Phase II Soil Investigation (Appendix E-1) and a Phase I ESA for APN 119-228-112 (Appendix E-2) were prepared by Hazard Management Consulting Inc. to characterize the potential hazards associated with the historical and current uses of the project site and surrounding areas. Historical uses of the project site included agricultural, residential land, and vacant land from as early as 1930. Additional residential structures were developed at the project site over the years. According to City records dating back to the 1970s, the site has been noted to have been used by several residential occupants. Currently, the site remains in residential use along with vacant land, livestock, automotive repair, autobody salvage, and tow truck storage.

Based on the results of the research, available data, and a site survey, the Phase I ESA (Appendix E-1) identified automotive chemicals and evidence of oil staining in the automotive repair area of 7824 Victoria Avenue and a concrete pad was observed with a significant spill of oil and evidence that the stain had reached the soil at 26462 6th Street. These two areas of staining were sampled as part of the Limited Phase II investigation.

The Limited Phase II Soil Investigation concluded that the concentrations reported in the soil samples were below screening levels, but they were elevated and of limited quantity. The estimated volume of affected soil is approximately 5 CY. To ensure this contamination does not threaten the health of future occupants of the project site, MM-HAZ-1 shall be required. MM-HAZ-1 will require the removal and disposal of the stained soil prior to grading of the site. Implementation of MM-HAZ-1 would ensure that previous contamination would not result in adverse health and safety impacts to workers during construction of the project or to future occupants of the site.

In addition, the Phase I ESA noted that due to the age of the on-site buildings and structures, it is likely that asbestos-containing materials (ACM) was used in their construction. Demolition of these buildings and structures can cause encapsulated ACM (if present) to become friable and, once airborne, would be considered a carcinogen. A carcinogen is a substance that causes cancer or helps cancer grow. Such releases could pose significant risks to persons living and working in and around the project area, as well as to project construction workers. Due to this likelihood of ACMs being present in the existing site buildings, a pre-demolition ACM survey should be conducted prior to any disturbance of suspected ACMs.

Abatement of all ACM encountered during any future building demolition activities would be required to be conducted in accordance with all applicable laws and regulations, including those of the EPA (which

regulates disposal), Occupational Safety and Health Administration (OSHA), U.S. Department of Housing and Urban Development, Cal/OSHA (which regulates employee exposure), and SCAQMD.

For example, the EPA requires that all asbestos work performed within regulated areas be supervised by a person who is trained as an asbestos supervisor (EPA Asbestos Hazard Emergency Response Act, 40 CFR 763). SCAQMD's Rule 1403 requires that buildings undergoing demolition or renovation be surveyed for ACM prior to any demolition or renovation activities. Should ACM be identified, Rule 1403 requires that ACM be safely removed and disposed of at a regulated disposal site, if possible. If it is not possible to safely remove ACM, Rule 1403 requires that safe procedures be used to demolish the building with asbestos in place without resulting in a significant release of asbestos to the environment. Additionally, during demolition, grading, and excavation, all construction workers would be required to comply with the requirements of Title 8 of the California Code of Regulations, Section 1529 (Asbestos), which provides the exposure limits, exposure monitoring, respiratory protection, and good working practices by workers exposed to asbestos.

Mandatory compliance with these regulatory requirements would ensure that construction workers and the public are not exposed to significant ACM health hazards during demolition and/or transport of demolition waste to an appropriate disposal facility, and would ensure that impacts related to ACM less than significant.

Upon completion of soil remediation efforts in compliance with the guidelines outlined in Appendix E-1 potentially hazardous materials would likely be handled on the project site as part of project construction. These materials would include gasoline, diesel fuel, lubricants, and other petroleum-based products required to operate and maintain construction equipment. Handling of these potentially hazardous materials would be temporary and would coincide with the short-term construction phase of the project.

Although these materials would likely be stored on the project site, storage would be required to comply with the guidelines set forth by each product's manufacturer and with all applicable federal, state, and local regulations pertaining to the storage of hazardous materials. Consistent with federal, state, and local requirements, the transport of hazardous materials to and from the project site would be conducted by a licensed contractor. Any handling, transport, use, or disposal of hazardous materials would comply with all relevant federal, state, and local agencies and regulations, including EPA, the California Department of Toxic Substances Control, OSHA, the California Department of Transportation (Caltrans), the Resource Conservation and Recovery Act, and the SCAQMD. Therefore, with compliance with applicable regulations, short-term construction impacts related to the transport, use or disposal of hazardous materials would be less than significant.

MM-HAZ-1 Prior to the issuance of building permits, the project applicant shall retain a qualified contractor to remove and dispose of contaminated soil in the vicinity of the automotive repair area at 7824 Victoria Avenue and in the vicinity of the concrete pad at 26462 6th Street, as identified in the December 2020 *Phase I Environmental Site Assessment and Limited Phase II Soil Investigation 7809 Grape Street, 7834 Victoria Avenue, 26432 6th Street, and Assessor's Parcel Numbers: 1192-281-09 and 1192-281-14, Highland, California 92346*, prepared by Hazard Management Consulting, or any updates to that report. The removal, transport, and disposal of refuse shall be done in accordance with all applicable local, state, and federal guidelines related to hazardous materials handling. A summary of the soil removal and disposal activities shall be provided to the City of Highland within a reasonable timeframe following completion of these activities.

Long-Term Operational Impacts

Potentially hazardous materials associated with project operations would include materials used during typical cleaning and maintenance activities. Although these potentially hazardous materials would vary, they would generally include household cleaning products, paints, fertilizers, and herbicides and pesticides. Many of these materials are considered household hazardous wastes, common wastes, and/or universal wastes by the EPA, which considers these types of wastes to be common to businesses and households and to pose a lower risk to people and the environment than other hazardous wastes when properly handled, transported, used, and disposed of (EPA 2021). Federal, state, and local regulations typically allow these types of wastes to be handled and disposed of with less stringent standards than other hazardous wastes, and many of these wastes do not have to be managed as hazardous waste. Additionally, any potentially hazardous material handled on the project site would be limited in both quantity and concentrations, consistent with other similar industrial uses located in the City, and any handling, transport, use, and disposal would comply with applicable federal, state, and local agencies and regulations. Further, as mandated by OSHA (OSHA n.d.), all hazardous materials stored on the project site would be accompanied by a Material Safety Data Sheet, which would inform employees and first responders as to the necessary remediation procedures in the case of accidental release. Therefore, long-term operational impacts associated with hazardous materials would be less than significant.

b) ***Would the project 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?***

Less-than-Significant Impact. Refer to response provided in Section 3.9(a).

c) ***Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?***

No Impact. The nearest school to the project site is Cypress Elementary School (26825 Cypress St.), which is located 0.38 miles east of the project site. Therefore, no impacts associated with emitting or handling hazardous materials within 0.25 miles of a school would occur.

d) ***Would the project be located on a site that 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?***

No Impact. The project site is not included on any hazardous waste site lists, including the California Department of Toxic Substances Control's EnviroStor database, the State Water Resources Control Board's GeoTracker site, the Cortese list, or other lists compiled pursuant to Section 65962.5 of the Government Code (EPA 2021; DTSC 2021; SWRCB 2021b). Therefore, no impacts associated with hazardous materials sites would occur.

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?***

Less-than-Significant Impact. The San Bernardino International Airport and Trade Center (SBIA) is located approximately 0.3 miles south of the project site. The SBIA includes two distinct components: 1) the airport

portions (and related facilities) of the former Norton Air Force Base, and 2) the Trade Center, which encompasses the non-airport related portions of the former base. The project site is located within the Airport Influence Area (General Plan Figure 6-7) outlined in the City's General Plan (City of Highland 2006). As required by state law for real estate transactions within the Airport Influence Area, notification/disclosure statements are required to alert potential buyers and tenants of the presence of and potential impacts from the San Bernardino International Airport. The San Bernardino Airport Land Use Plan is currently being drafted and was not available at the time of this report. Nonetheless, the Federal Aviation Administration Regulations Title 14 Part 77 determines restrictions to obstructions and height limitations for structures taller than 200 feet or within 20,000 feet of an airport. The proposed project would be consistent with the general land use of the area. Additionally, the project would be consistent with §19.20.015 Noise Standards. Therefore, a less than significant impact would occur.

f) ***Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?***

Less-than-Significant Impact. The City of Highland has an Emergency Operations Plan to ensure the most effective and economical allocation of resources for the maximum benefit and protection of the City in times of emergency. No revisions to this plan would occur as a result of the project. The project does not propose any changes to the geometry of evacuation route roadways to the extent that these roadways' ability to serve as emergency evacuation routes would be compromised. As a result, the project would not significantly affect emergency response or evacuation activities. Therefore, impacts would be less than significant.

g) ***Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?***

No Impact. The City's General Plan does not designate the project site as an area that would be at risk from wildland fires. Although there are currently some isolated vacant lots in the vicinity of the project site, the area surrounding the project site is largely developed and would not likely aid the spread of wildfire. Therefore, no direct or indirect impacts due to wildfire would occur.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
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?	☐	☐	☒	☐

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

a) ***Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?***

Short-Term Construction Impacts

Less-than-Significant Impact. Construction of the project would include earthwork activities that could potentially result in erosion and sedimentation, which could subsequently degrade downstream receiving waters and violate water quality standards. Stormwater runoff during the construction phase may contain silt and debris, resulting in a short-term increase in the sediment load of the municipal storm drain system. Substances such as oils, fuels, paints, and solvents may be inadvertently spilled on the project site and subsequently conveyed via stormwater to nearby drainages, watersheds, and groundwater.

For stormwater discharges associated with construction activity in the State of California, the State Water Resources Control Board (SWRCB) has adopted the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit) to avoid and minimize water quality impacts attributable to such activities. The Construction General Permit applies to all projects in which construction activity disturbs more than one acre or more of soil. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, such as stockpiling and excavation.

The Construction General Permit requires the development and implementation of a SWPP, which would include and specify water quality BMPs designed to prevent pollutants from contacting stormwater and keep all products of erosion from moving off site into receiving waters (in this case, the City Creek Channel, the Twin Creek Channel, the Prado Flood Control Basin, the Santa Ana River, and its discharge into the Pacific Ocean). Routine inspection of all BMPs is required under the provisions of the Construction General Permit, and the SWPPP must be prepared and implemented by qualified individuals as defined by the SWRCB (SWRCB 2021a).

The City of Highland is a co-permittee under San Bernardino County's National Pollution Discharge Elimination System (NPDES) Permit (No. CAS618036), and as such is required to adhere to the County-wide NPDES permit requirements. Because land disturbance for project construction activities would exceed one acre, the project Applicant would be required to obtain coverage under the Construction General Permit issues by the SWRCB prior to the start of construction within the project site. Specifically, the Construction General Permit requires that the following be kept on site at all times: (i) a copy of the Notice of Intent to Comply with Terms of the General Permit to Discharge Water Associated with Construction Activity; (ii) a waste discharge identification number issues by the SWRCB; (iii) a SWPPP and Monitoring Program Plan for the construction activity requiring the construction permit; and (iv) records of all inspections, compliance and non-compliance reports, evidence of self-inspection, and good housekeeping practices.

The SWPPP requires the construction contractor to implement water quality BMPs to ensure that water quality standards are met, and that stormwater runoff from the construction work areas do not cause degradation of water quality in receiving water bodies. The SWPPP must describe the type, location, and function of stormwater BMPs to be implemented, and must demonstrate that the combination of BMPs selected are adequate to meet the discharge prohibitions, effluent standards, and receiving water limitations are contained in the Construction General Permit. Therefore, short-term construction impacts associated with water quality, stormwater drainage, and stormwater runoff would be less than significant.

Long-Term Operational Impacts

Less-than-Significant Impact. The project would be subject to the municipal stormwater permit, the Municipal Separate Storm Sewer System (MS4) Permit, issued to San Bernardino County and incorporated cities within the County by the Santa Ana Regional Water Quality Control Board. The MS4 Permit requires implementation of LID BMPs to prevent pollutants from being discharged off site by mimicking pre-development site hydrology and feasible source control. The LID Ordinance is designed to reduce runoff from impervious surfaces, including new development, through landscape design that promotes water retention, permeable surface design, natural drainage systems, and on-site retention where feasible (RWQCB 2010). These project-specific designs would reduce impacts to water quality associated with redevelopment.

As required by the San Bernardino County Municipal Separate Stormwater Sewer System NPDES Permit, a preliminary Water Quality Management Plan (WQMP) was prepared for the project in April 2021 (Appendix F-1). The WQMP is a post-construction management program that outlines implementation measures to ensure water quality standards are met, including implementation of source control and operational BMPs such as designing landscape to minimize irrigation and runoff; utilizing covered and leak proof trash dumpsters; and sweeping and litter control of loading areas in order to prevent pollutants from entering runoff. The WQMP would be implemented prior to the issuance of grading/building permits as required by the San Bernardino County Municipal Separate Stormwater Sewer System NPDES Permit. The project would

not violate any water quality standards or waste discharge requirements during long-term operation through compliance with the WQMP. Therefore, long-term operational impacts associated with water quality, stormwater drainage, and stormwater runoff would be less than significant.

In summary, project grading and construction would be completed in accordance with an NPDES-mandated SWPPP, which would include standard BMPs to reduce potential off-site water quality impacts related to erosion and incidental spills of petroleum products and hazardous substances from equipment. Surface water runoff during project operations would be managed through the use of a proposed underground infiltration/detention system on the west side of the project site. Therefore, the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality and water quality impacts would be less than significant.

b) ***Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?***

Groundwater Supplies

Less-than-Significant Impact. The project site is located within the service area of the EVWD. EVWD's main water supply is from the Bunker Hill Basin which has the capacity to provide 70,000 acre-foot per year from groundwater and surface water resources. The proposed project would include a 2-inch water service line that would connect to the existing 6-inch EVWD water line located along Victoria Avenue. The proposed project also includes the construction of an on-site underground infiltration/detention basin on the west side of the project site for treatment. During a 100-year storm event, the underground system would be able to capture 100% of the storm event.

Additionally, according to the geotechnical investigation (Appendix D-1), groundwater was not encountered during test excavations, which extended to a maximum depth of 15.5 feet. Historic high groundwater in the vicinity has been recorded greater than 65 feet below grade at nearby wells (Appendix D-1). As such, the project's subsurface construction activities, which would only extend a few feet below grade, are highly unlikely to encounter groundwater, and dewatering activities are not anticipated to be necessary. Therefore, impacts associated with groundwater supplies would be less than significant.

Groundwater Recharge

Less-than-Significant Impact. While not fully developed, the project site is highly disturbed and does not contain a groundwater recharge basin or other facilities that promote groundwater recharge. Thus, under the existing condition, the project site is not considered an important location for groundwater recharge.

Following construction, the project site would contain landscape areas and other pervious surfaces that would allow for water to percolate into the subsurface soils compared to the existing conditions. In addition, the project would include a detention/infiltration basin on the west side of the property to capture and infiltrate runoff. The WQMP "Infiltration BMP Feasibility" section concludes that the proposed project, including the infiltration/detention basin, would not pose a significant risk for groundwater and/or increase the risk of geologic hazards. Therefore, impacts associated with groundwater recharge would be less than significant.

c) ***Would the project 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;***

Less-than-Significant Impact. Under the existing conditions, the project site consists of residential uses and vacant land. The project would result in the demolition and removal of the existing structures on the project site and the construction of new paved surfaces, a warehouse building, and landscape areas. Existing on-site runoff sheet flows westerly to Grape Street. Off-site runoff is collected by an existing drainage ditch along Victoria Avenue on the project site and conveyed to an existing 48" CMP at the southeast corner of the project site. The existing drainage ditch would be removed and replaced by a proposed 42" storm drain and connected to the existing 48" CMP. The project would also include a new engineered storm drainage system that would feature structural BMPs, including an infiltration/detention system to treat and manage on-site stormwater flows. The proposed infiltration/detention system would be designed to capture 100% of a 100-year storm event and would minimize the potential for siltation or erosion on or off site. The project's proposed storm drain system would be designed to conform with all applicable federal, state and local requirements related to drainage, hydrology, and water quality, including the current MS4 Permit adopted by the Santa Ana RWQCB. Additionally, the project's structural BMPs would be designed such any potential sediments collected on site are captured in retention facilities so that they would not be conveyed to downstream waters and result in siltation.

As such, altering the on-site drainage pattern would be conducted in a manner consistent with all applicable standards related to the collection and treatment of stormwater, such that they would not result in substantial erosion or siltation on or off site. Therefore, impacts associated with altering the existing drainage pattern of the project site would be less than significant.

ii) ***substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;***

Less-than-Significant Impact. As discussed in Section 3.10(c)(i), the project would increase the amount of impervious surfaces on the project site and inevitably alter the existing on-site drainage pattern. Runoff generated by the project site would be routed to the proposed underground infiltration/detention system on the western side of the project site through a combination of roof drains, storm drains, curbs, and gutters. The development of the existing site into the proposed project would not create any adverse impacts downstream for storm events up to the 100-year storm. There would not be an increase in the existing discharge from the site in both the 10-year and 100-year events due to the proposed infiltration basin that would be sized to capture and infiltrate the 100-year rainfall event. Discharge from the site would greatly decrease from the existing condition.

Under existing conditions, stormwater runoff sheet flows west to Grape Street. There are currently no existing storm drain facilities on the western side of the project site to capture surface runoff. As such, the proposed project would not increase the amount of surface runoff and impacts would be less than significant.

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

Less-than-Significant Impact. As discussed in Section 3.10(c)(i), the project would increase the amount of impervious surfaces on the project site and inevitably alter the existing on-site drainage pattern. Runoff generated by the project site would be routed to the proposed underground infiltration/detention system on the western side of the project site through a combination of roof drains, storm drains, curbs, and gutters.

The proposed on-site underground infiltration/detention system was designed to infiltrate 100% of the 100-year storm event. However, if the proposed underground infiltration/retention chamber system reaches capacity, flows would then be discharged through a proposed 4-foot parkway culvert on the corner of 6th Street and Grape Street that would serve as an emergency spillway. According to the Preliminary Drainage Report (Appendix F-2) prepared for the project, the underground infiltration/detention system has the capacity to retain 51,437.5 cubic feet of stormwater before any stormwater is allowed to discharge from the project site, which is large enough to accommodate a 100-year storm event. The analysis concluded that the drainage and storm drain facilities are adequately sized to handle a 100-year design storm event, consistent with the methodology outlined in the San Bernardino County Flood Control District (SBCFCD) Hydrology Manual. Therefore, impacts associated with the project creating or contributing runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff would be less than significant.

iv) Impede or redirect flood flows?

No Impact. According to the Federal Emergency Management Agency Flood Insurance Rate Map No. 06071C8701J (FEMA 2016), the project site is located in Zone X which is located outside of the 0.2% Annual Chance Flood Hazard Zone (500-year floodplain). The project's on-site storm drain systems would adequately provide flood protection for the 100-year storm event. Implementation of the project would not substantially impede or redirect flood flows. Therefore, no impacts associated with flooding would occur.

d) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Less-than-Significant Impact. The project site is located approximately 70 miles east of the Pacific Ocean. Because of the project site's inland location, the project would not be subject to tsunami. Additionally, due to the lack of a larger adjacent perennial waterbody such as a reservoir or lake, the project site would not be susceptible to seiche. Further, the project site's relatively flat topography and lack of nearby hillside would eliminate any impact-related mudflow. However, the project site, along with most of the City of Highland, is within the limit of flooded area with dam failure of the Seven Oaks Dam and 500-Year floodplain (City of Highland 2006). The Seven Oaks Dam has been designed to resist an earthquake measuring 8.0 on the Richter scale and is designed to provide flood protection during 350-year storm events. Based on these design characteristics and ongoing maintenance of the dam's structural integrity, it is highly unlikely that the project site would be subject to inundation due to ta failure of the Seven Oaks Dam. Therefore, due to the low likelihood that the Seven Oaks Dam would be subject to failure and because the project would not involve the uncontained storage of pollutants outside of the proposed building, the project would not

risk release of pollutants due to inundation associated with the these natural phenomena, and impacts would be less than significant.

e) ***Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?***

Less-than-Significant Impact. Refer to responses provided in Section 3.10(a) and 3.10(b). The project would comply with regional and local regulations requiring preparation of a SWPPP and would not obstruct existing water quality control plans or groundwater sustainable management plans. In addition, the project applicant would comply with the project specific WQMP during operation activities. The proposed project would provide an on-site infiltration/detention basin, which would help the City sustainably manage groundwater levels. Therefore, impacts associated with conflict with a water quality control plan or sustainable groundwater management plan would be less than significant.

3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING – Would the project:				
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) ***Would the project physically divide an established community?***

No Impact. The physical division of an established community is typically associated with the construction of a linear feature, such as a major highway or railroad tracks, or removal of a means of access, such as a local road or bridge, which would impair mobility within an existing community or between a community and an outlying area. Currently, the project site is located within an area of the City that is primarily zoned for business park and industrial uses, and thus, is not used as a connection between two established communities.

Instead, connectivity in the surrounding project area is facilitated via local roadways and pedestrian facilities. Despite the nearby scattered residential uses, the project would not impede movement between these residences within the project area, within an established community, or from one established community to another. Therefore, no impacts associated with division of an existing community would occur.

b) ***Would the project 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?***

Less-than-Significant Impact. The City's Zoning Map designates the project site as BP. According to Section 16.24.020 (A), the primary purpose of the BP District is to provide appropriate regulations and suitable locations for light industrial, research and development, and office-based firms seeking pleasant and attractive working environments, and for business support services and commercial uses requiring large parcels (City of Highland 2021). The Municipal Code identifies Warehousing and Wholesaling as permitted, subject to a conditional use permit application (City of Highland 2021). As part of the City's site-plan review process, the City would thoroughly review all plans for the proposed project to ensure compliance with all applicable development standards set forth in the Municipal Code and other relevant land use plans, policies, and regulations. As part of the City's site-plan review process, the City has determined that the project would be consistent with all development standards required for the BP Zone, with the exception of Section 16.24.040 Employment district development standards, of the City's Municpal Code, which states that building heights are not to exceed 35 feet within the BP District. The project proposes a building height of 45. However, with the processing of a variance consistent with the procedures outlined in Section 16.08.870, which states that the City may permit such modification of the height regulations as are necessary to secure an appropriate improvement on a lot. As such, upon approval of Variance No. 21-001, the project's height could be allowed within in the BP District.

The City's General Plan Land Use Map designates the project site as BP within the Victoria Avenue Corridor (City of Highland 2006). The BP land use permits a variety of light industrial, research and development, and office uses. The maximum floor area ratio permitted within the BP designation is 0.6 (City of Highland 2006). The proposed project would include construction of an industrial warehouse with a floor area ratio of 0.57. As such, the proposed project is consistent with the permitted land use and maximum density permitted by the City.

The Victoria Avenue Corridor is located along Victoria Avenue from Highland Avenue to 3rd Street. The purpose of the Victoria Avenue Corridor is to establish new land use patterns to take advantage of future commercial opportunities, improve traffic, and provide future development opportunities along Victoria Avenue (City of Highland 2006). Development of a light industrial warehouse would introduce additional processing and distribution opportunities in close proximity to the San Bernardino International Airport.

As such, the project would be consistent with local plans, policies, and regulations governing land use decisions. Therefore, impacts associated with applicable land use plans, policies, and regulations would be less than significant.

3.12 Mineral Resources

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

a) ***Would the project 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?***

Less-than-Significant Impact. According to the City's General Plan, the project site is within an MRZ-2, meaning significant mineral deposits or likelihood of significant mineral deposits exist; however, the significance of the deposit is undetermined.

The project site is located in an urbanized portion of the City and is bound by existing residential, commercial, and industrial development in all directions. Mineral resource mining is not a compatible use with these land uses. The project site is not large enough to effectively extract mineral resources. Considering the existing surrounding land uses and the incompatibility of mineral resource extraction activities in the project area, potential significant mineral resources within the project area are considered unavailable for extraction. Therefore, impacts associated with mineral resources would be less than significant.

b) ***Would the project 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?***

Less-than-Significant Impact. Refer to the response provided in Section 3.11(a).

3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE – Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within 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?	☐	☐	☒	☐

Noise and Vibration Characteristics

Noise is defined as unwanted sound. Sound may be described in terms of level or amplitude (measured in decibels [dB]), frequency or pitch (measured in hertz or cycles per second), and duration (measured in seconds or minutes). The standard unit of measurement of the amplitude of sound is the decibel. Because the human ear is not equally sensitive to sound at all frequencies, a special frequency-dependent rating scale is used to relate noise to human sensitivity. The A-weighted decibel (dBA) scale performs this compensation by discriminating against low and very high frequencies in a manner approximating the sensitivity of the human ear. Several descriptors of noise (noise metrics) exist to help predict average community reactions to the adverse effects of environmental noise, including traffic-generated noise, on a community. These descriptors include the equivalent noise level over a given period (L_{eq}), the statistical sound level, the day–night average noise level (L_{dn}), and the Community Noise Equivalent Level (CNEL). Each of these descriptors uses units of dBA. Table 20 provides examples of A-weighted noise levels from common sounds. In general, human sound perception is such that a change in sound level of 3 dBA is barely noticeable, a change of 5 dBA is clearly noticeable, and a change of 10 dBA is perceived as doubling or halving the sound level.

Table 20. Typical Sound Levels in the Environment and Industry

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
—	110	Rock band
Jet flyover at 300 meters (1,000 feet)	100	—
Gas lawn mower at 1 meter (3 feet)	90	—
Diesel truck at 15 meters (50 feet), at 80 kilometers per hour (50 mph)	80	Food blender at 1 meter (3 feet) Garbage disposal at 1 meter (3 feet)

Table 20. Typical Sound Levels in the Environment and Industry

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
Noisy urban area, daytime gas lawn mower at 30 meters (100 feet)	70	Vacuum cleaner at 3 meters (10 feet)
Commercial area Heavy traffic at 90 meters (300 feet)	60	Normal speech at 1 meter (3 feet)
Quiet urban daytime	50	Large business office Dishwasher, next room
Quiet urban nighttime	40	Theater, large conference room (background)
Quiet suburban nighttime	30	Library
Quiet rural night time	20	Bedroom at night, concert hall (background)
—	10	Broadcast/recording studio
Lowest threshold of human hearing	0	Lowest threshold of human hearing

Source: Caltrans 2013.
Note: dBA = A-weighted decibel.

L_{eq} is a sound energy level averaged over a specified period (typically no less than 15 minutes for environmental studies). L_{eq} is a single numerical value that represents the amount of variable sound energy received by a receptor during a time interval. For example, a 1-hour L_{eq} measurement would represent the average amount of energy contained in all the noise that occurred in that hour. L_{eq} is an effective noise descriptor because of its ability to assess the total time-varying effects of noise on sensitive receptors.

Unlike the L_{eq} metrics, L_{dn} and CNEL metrics always represent 24-hour periods, usually on an annualized basis. L_{dn} and CNEL also differ from L_{eq} because they apply a time-weighted factor designed to emphasize noise events that occur during the evening and nighttime hours (when speech and sleep disturbance is of more concern). "Time weighted" refers to the fact that L_{dn} and CNEL penalize noise that occurs during certain sensitive periods. In the case of CNEL, noise occurring during the daytime (7:00 a.m.–7:00 p.m.) receives no penalty. Noise during the evening (7:00 p.m.–10:00 p.m.) is penalized by adding 5 dB, while nighttime (10:00 p.m.–7:00 a.m.) noise is penalized by adding 10 dB. L_{dn} differs from CNEL in that the daytime period is defined as 7:00 a.m.–10:00 p.m., thus eliminating the evening period. L_{dn} and CNEL are the predominant criteria used to measure roadway noise affecting residential receptors. These two metrics generally differ from one another by no more than 0.5 dB to 1 dB and, as such, are often treated as equivalent to one another.

Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Vibration can be a serious concern, causing buildings to shake and rumbling sounds to be heard. In contrast to noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common sources of vibration are trains, buses on rough roads, and construction activities, such as blasting, pile driving, and heavy earthmoving equipment.

Several different methods are used to quantify vibration. Peak particle velocity is defined as the maximum instantaneous peak of the vibration signal. Peak particle velocity is most frequently used to describe vibration impacts to buildings and is usually measured in inches per second. The root mean square amplitude is most

frequently used to describe the effect of vibration on the human body and is defined as the average of the squared amplitude of the signal. Decibel notation is commonly used to measure root mean square. The decibel notation acts to compress the range of numbers required to describe vibration.

High levels of vibration may cause physical personal injury or damage to buildings. However, vibration levels rarely affect human health. Instead, most people consider vibration to be an annoyance that can affect concentration or disturb sleep. In addition, high levels of vibration can damage fragile buildings or interfere with equipment that is highly sensitive to vibration (e.g., electron microscopes). Most perceptible indoor vibration is caused by sources within buildings, such as operation of mechanical equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is rarely perceptible.

Sensitive Receptors

Noise- and vibration-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would be considered noise and vibration sensitive and may warrant unique measures for protection from intruding noise. Sensitive receptors in the vicinity of the project site consist of legal non-conforming residential uses (i.e., non-residentially zoned) located to the north and southeast of the project site, legal conforming residences to the west, and a school located to the northeast. These sensitive receptors represent the nearest sensitive land uses with the potential to be impacted by construction and/or operation of the project.

Existing Noise Conditions

Noise measurements were conducted in the vicinity of the project site on April 27, 2021, to characterize the existing noise levels. Table 21 provides the locations, dates, and times the noise measurements were taken. The noise measurements were taken using a Soft dB Piccolo sound level meter equipped with a 0.5-inch, pre-polarized condenser microphone with pre-amplifier. The sound level meter meets the current American National Standards Institute standard for a Type 2 (General Use) sound level meter. The accuracy of the sound level meter was verified using a field calibrator before and after the measurements, and the measurements were conducted with the microphone positioned approximately 5 feet above the ground.

Table 21. Measured Noise Levels

Receptor	Location	Date	Time	L_{eq} (dBA)	L_{max} (dBA)
ST1	Northwest corner of project site, adjacent to a residence (7809 Grape Street)	4/27/2021	10:17 a.m.–10:32 a.m.	60	75.7
ST2	West of project site, adjacent to residence at 7864 Grape Street	4/27/2021	10:35 a.m.–10:51 a.m.	63.9	84.2
ST3	Southeast of project site, at vacant lot adjacent to residence at 7933 Victoria Avenue	4/27/2021	11:09 a.m.–11:24 a.m.	68.2	91.4
ST4	North of project site, adjacent to residence at 7770 Victoria Avenue	4/27/2021	11:37 a.m.–11:52 a.m.	69	88.3

Source: Appendix G-1.
Notes: L_{eq} = equivalent continuous sound level (time-averaged sound level); dBA = A-weighted decibels; L_{max} = maximum sound level during the measurement interval.

Four short-term noise measurement locations (ST1–ST4) were conducted in the vicinity of the project site, as shown in Figure 17, Noise Measurement Locations. The measured L_{eq} and maximum noise levels are provided in Table 21. The field noise measurement data sheets are provided in Appendix G-1, Field Data Noise Sheets. The primary noise sources at the sites identified in Table 21 consisted of traffic on local roadways; other, secondary noise sources included occasional construction activities, distant mechanical equipment, distant aircraft, and distant barking dogs. As shown in Table 21, the measured sound levels ranged from approximately 60 dBA L_{eq} at ST1 to approximately 69 dBA L_{eq} at ST4.

Regulatory Setting

Federal

There are no federal noise standards that would directly regulate environmental noise during construction and operation of the project. The following is provided because guidance summarized herein is used or pertains to the analysis.

Federal Transit Administration

In its Transit Noise and Vibration Impact Assessment guidance manual, the Federal Transit Administration (FTA) recommends a daytime construction noise level threshold of 80 dBA L_{eq} over an 8-hour period (FTA 2018) when detailed construction noise assessments are performed to evaluate potential impacts to community residences surrounding a project. Although this FTA guidance is not a binding regulation, it is provided here for comparison purposes in the absence of such limits at the state and local jurisdictional levels.

Federal Interagency Committee on Noise

Some guidance regarding the determination of a substantial permanent increase in ambient noise levels in the project vicinity above existing levels is provided by the 1992 findings of the Federal Interagency Committee on Noise (FICON) (FICON 1992), which assessed the annoyance effects of changes in ambient noise levels resulting from aircraft operations. The FICON recommendations are based upon studies that relate aircraft and traffic noise levels to the percentage of persons highly annoyed by the noise. Annoyance is a qualitative measure of the adverse reaction of people to noise that generates speech interference, sleep disturbance, or interference with the desire for a tranquil environment.

The rationale for the FICON recommendations is that it is possible to consistently describe the annoyance of people exposed to transportation noise in terms of L_{dn}. The changes in noise exposure that are shown in Table 22 are expected to result in equal changes in annoyance at sensitive land uses. Although the FICON recommendations were specifically developed to address aircraft noise impacts, they are used in this analysis to define a substantial increase in community noise levels related to all transportation noise sources and permanent non-transportation noise sources.

Table 22. Measures of Substantial Increase for Community Noise Sources

Ambient Noise Level Without Project (L_{dn})	Significant Impact Assumed to Occur If the Project Increases Ambient Noise Levels by:
<60 dBA	+ 5 dBA or more
60-65 dBA	+ 3 dBA or more
>65 dBA	+ 2 dBA or more

Source: FICON 1992.
Notes: L_{dn} = day–night average noise level; dBA = decibels.

State

California Government Code

California Government Code Section 65302(f) mandates that the legislative body of each county and city adopt a noise element as part of its comprehensive general plan. The local noise element must recognize the land use compatibility guidelines established by the State Department of Health Services. The guidelines rank noise land use compatibility in terms of "normally acceptable," "conditionally acceptable," "normally unacceptable," and "clearly unacceptable" noise levels for various land use types. Single-family homes are "normally acceptable" in exterior noise environments up to 60 dBA CNEL and "conditionally acceptable" up to 70 dBA CNEL.[23] Multiple-family residential uses are "normally acceptable" up to dBA 65 CNEL and "conditionally acceptable" up to dBA 70 CNEL. Schools, libraries, and places of worship are "normally acceptable" up to 70 dBA CNEL, as are office buildings and business, commercial, and professional uses.

Local

City of Highland Municipal Code

Operational Noise Standards

Pursuant to Chapter 8.50 (Noise Control) of the Highland Municipal Code, allowable daytime (between the hours of 7:00 AM and 10:00 PM) and nighttime (between the hours of 10:00 PM and 7:00 AM) noise levels are as follows:

- Residential – 60 dBA daytime, 55 dBA nighttime.
- Commercial – 70 dBA daytime, 65 dBA nighttime.
- Industrial Zone – 75 dBA at any time.

Construction Noise Standards

Pursuant to Section 8.50.060 (Exemptions), noise associated with "construction, repair, or excavation work performed pursuant to a valid written agreement with the city or any of its political subdivisions, which agreement provides for noise mitigation measures", is exempt. Because the proposed project does not include a Development Agreement or other agreement with the City or any of its political subdivisions, it is not exempt from performing a construction noise analysis and providing adequate mitigation measures. The following includes an analysis of the project's construction noise impacts.

City of Highland General Plan

The City's General Plan Noise Element (City of Highland 2006) references the Municipal Code's noise standards as guidelines to evaluate the acceptability of noise impacts. These standards are used to assess long-term noise impacts on land uses. The Noise Element identifies noise problems in the community, quantifies existing and projected noise levels, addresses excessive noise exposure, and provides regulations to control noise. The General Plan Noise Element contains the following goals and policies that address noise and are applicable to the project:

[23] A "conditionally acceptable" designation implies new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements for each land use is made and needed noise insulation features are incorporated in the design. By comparison, a "normally acceptable" designation indicates that standard construction can occur with no special noise reduction requirements.

Goal 7.1. Protect sensitive land uses and the citizens of Highland from annoying and excessive noise through diligent planning and regulation.

Policies:

1) Enforce the City's Noise Control Ordinance consistent with health and quality of life goals and employ effective techniques of noise abatement through such means as a noise ordinance, building codes and subdivision and zoning regulations.
2) Encourage the use of site planning and architectural techniques such as alternative building orientation and walls combined with landscaping to mitigate noise to levels consistent with interior and exterior noise standards.
3) Require mitigation where sensitive uses are to be placed along transportation routes to ensure compliance with interior and exterior noise standards.
4) Consider the compatibility of proposed land uses with the noise environment when preparing, revising or reviewing development proposals.
7) Require that site-specific noise studies be conducted by a qualified acoustic consultant utilizing acceptable methodologies while reviewing the development of sensitive land uses or development that has the potential to impact sensitive land uses. Also require a site-specific noise study if the proposed development could potentially violate the noise provisions of the General Plan or City ordinance.

Actions:

3) When site and architectural design features cannot sufficiently reduce adverse noise levels, or cannot be economically provided, require the provision of noise barriers/berms, provided that noise barriers:
   - are sufficiently massive to prevent significant noise transmission and high enough to shield receiver from noise source;
   - noise barriers exhibit a minimum acceptable density of four pounds per square foot (equivalent to 3/4-inch plywood);
   - contain no cracks or openings; and
   - minimize the effect of flanking by bending the barrier back from the noise source at the end of the barrier.
4) Require landscaping treatment to be provided in conjunction with noise barriers to provide visual relief and to reduce aesthetic impacts.
6) Maintain a noise complaint file to document areas of excessive noise in the City.

Goal 7.3. Protect residents from the effects of "spill over" or nuisance noise.

Policies:

1) Enforce the City's Noise Control Ordinance so that new projects located in commercial or entertainment areas do not exceed stationary-source noise standards at the property line of proximate residential or commercial uses, as appropriate.
2) Prohibit new industrial uses from exceeding commercial or residential stationary-source noise standards at the most proximate land uses, as appropriate. (Industrial noise may spill over to proximate industrial uses so long as the combined noise does not exceed the appropriate industrial standards.)

3) Require that construction activities employ feasible and practical techniques to minimize noise impacts on adjacent uses. Particular emphasis shall be placed on the restriction of hours in which work other than emergency work may occur.
4) Require that the hours of truck deliveries to commercial properties abutting residential uses be limited unless there is no feasible alternative or there are overriding transportation benefits by scheduling deliveries at another hour.
5) Ensure that buildings are constructed to prevent adverse noise transmission between differing uses located in the same structure and individual residences in multi-family buildings.

Actions:

1) As a condition of approval, limit non-emergency construction activities adjacent to existing noise-sensitive uses to daylight hours between 7:00 a.m. and 6:00 p.m. Discourage construction on weekends or holidays except in the case of construction proximate to schools where these operations could disturb the classroom environment.
2) Ensure that the design and placement of air conditioning units and pool equipment within residential areas is accomplished in a manner that does not intrude upon the peace and quiet of adjacent noise-sensitive uses.
3) Encourage the use of portable noise barriers for heavy equipment operations performed within 100 feet of existing residences or make applicant provide evidence as to why the use of such barriers is infeasible.

a) ***Would the project result in 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?***

Short-Term Construction Noise

Less-than-Significant Impact. Construction noise is considered a short-term impact and would be considered significant if construction activities were to exceed the allowable hours of operation, as permitted by the City. Noise-sensitive land uses in the vicinity of the project include a legal non-conforming residences to the north[24] (within approximately 30 feet of the construction boundary), legal conforming residences to the west (within approximately 50 feet of the construction boundary), and legal non-conforming residences to the southeast (within approximately 150 feet of the construction boundary). The construction noise assessment focused on noise levels that would occur at the nearest residences; construction noise levels at greater distances from the site would be lower. Modeling assumptions and output calculations are provided in Appendix G-2, Construction Noise Modeling Inputs and Outputs.

Project-generated construction noise will vary depending on the construction process, the type of equipment involved, the location of the construction site with respect to sensitive receptors, the schedule proposed to carry out each task (e.g., hours and days of the week), and the duration of the construction work. A likely worst-case construction noise scenario using information provided by the project applicant and equipment identified by CalEEMod (see Section 3.3, Air Quality) for this type and size of project was calculated using the Federal Highway Administration's Roadway Construction Noise Model (FHWA 2008). Table 5 in Section 3.3 presents the equipment list used for the construction noise analysis.

24 Based upon the City of Highland Zoning Map (http://maps.digitalmapcentral.com/production/VECommunityView/cities/highland/index.aspx?), the proposed project site as well as the entire block (from Sixth St. and Cypress St. in the north-south direction and Victoria Ave. and Grape St. in the east-west direction) is zoned BP: Business Park. Similarly, the block at the southeast corner of Victoria Ave. and Sixth St. is zoned BP: Business Park.

Using the provided construction information, the Roadway Construction Noise Model was used to predict noise from on-site construction activities. The results are summarized in Table 23 (see Appendix E-2 for model results). Table 23 provides construction noise estimates for both a "typical worst-case" 1-hour average scenario in which construction equipment may be operating in proximity to any one receiver for extended periods, as well as an 8-hour average workday in which it is assumed that typically the equipment would be in motion and working both near and far from any one receiver, equating to approximately twice as far compared to the 1-hour scenario. The resulting 8-hour levels are thus 6 decibels lower than the 1-hour levels, based upon a noise attenuation rate of 6 decibels per doubling of distance.

As shown, the highest noise levels from construction are predicted to range from approximately 63 dBA $L_{eq\ 1\text{-}hour}$ (during the architectural coating phase) to 86 dBA $L_{eq\ 1\text{-}hour}$ (during demolition) at the nearest receivers. These maximum noise levels are considered to be a peak exposure, applicable to not more than 10%–15% of the total construction period, only while the construction activity is taking place along the property boundary closest to these nearest off-site receivers. In terms of a typical 8-hour workday, the highest noise levels from construction are predicted to range from approximately 57 dBA $L_{eq\ 8\text{-}hour}$ (during the architectural coating phase) to 80 dBA $L_{eq\ 8\text{-}hour}$ (during demolition) at the nearest receivers. The average construction noise levels (for construction taking place at a range of locations on site and modeled at the acoustical center for analysis purposes) range from approximately 52 dBA $L_{eq\ 1\text{-}hour}$ (during architectural coating) to approximately 68 dBA $L_{eq\ 1\text{-}hour}$ (during grading and site preparation) at the closest residences and are also shown in Table 23. The average noise levels (based upon the acoustic center[25]) are considered a better representation of the overall noise exposure experience for adjacent receivers over the duration of each construction phase. Noise levels, while relatively high when equipment is operating near the project boundaries, would not exceed the FTA's 80 dBA $L_{eq\ 8\text{-}hour}$ threshold.

Table 23. Construction Noise Summary of Results (dBA $L_{eq\ 1\text{-}hour}$/ dBA $L_{eq\ 8\text{-}hour}$)

Receiver Location (Distance)/ Description	Zoning Designation	Construction Noise Level by Construction Phase[1]					
		Demo.	*Site Prep.*	*Grading*	*Building Const.*	*Paving*	*Arch. Coating*
North Neighbor (30 feet) / Legal Non-Conforming Residence	Business Park	86/80	85/79	79/73	82/77	83/76	74/68
West Neighbor (50 feet) / Legal Conforming Residence	Residential	84/78	82/76	78/72	79/74	79/73	70/64
Southeast Neighbor (150 feet) / Legal Non-Conforming Residence	Business Park	76/70	74/68	73/67	71/67	71/65	63/57
Acoustic Center North Neighbor (400 feet) / Legal Non-Conforming Residence	Business Park	68/68	68/68	66/66	64/64	64/64	56/56
Acoustic Center East Neighbor (450 feet) / Legal Conforming Residence	Residential	67/67	67/67	65/65	63/63	63/63	55/55

25 The acoustic center is the combination of all construction work occurring on-site, near and far, and is considered to be equivalent to the geometric center, for the purposes of this analysis.

Table 23. Construction Noise Summary of Results (dBA $L_{eq\ 1\text{-}hour}$/ dBA $L_{eq\ 8\text{-}hour}$)

Receiver Location (Distance)/ Description	Zoning Designation	Construction Noise Level by Construction Phase[1]					
		Demo.	*Site Prep.*	*Grading*	*Building Const.*	*Paving*	*Arch. Coating*
Acoustic Center South Neighbor (620 feet) / Legal Non-Conforming Residence	Business Park	65/65	64/64	62/62	60/60	60/60	52/52

Source: Appendix G-2.
Notes: dBA = A-weighted decibels; $L_{eq\ 1\text{-}hour}$ = equivalent continuous sound level (time-averaged sound level) during a 1-hour period near the project boundary; $L_{eq\ 8\text{-}hour}$ = equivalent continuous sound level (time-averaged sound level) during an 8-hour construction work day; Demo. = Demolition; Site Prep. = Site Preparation; Building Const. = Building Construction; Arch. Coating = Architectural Coating.
1 See Section 3.3, Air Quality.

Based on the Roadway Construction Noise Model analysis (FHWA 2008; Appendix G-2), average noise levels from construction activities are calculated to create noise levels at sensitive residential receivers that would equal but would not exceed the FTA construction noise threshold of 80 dBA $L_{eq\ 8\text{-}hour}$ at nearby sensitive receiver locations. The project would be required to adhere to City of Highland General Plan limitations on construction noise through restrictions on allowable construction hours (Goal 7.3, Action 1):

> "As a condition of approval, limit non-emergency construction activities adjacent to existing noise-sensitive uses to daylight hours between 7:00 a.m. and 6:00 p.m. Discourage construction on weekends or holidays except in the case of construction proximate to schools where these operations could disturb the classroom environment."

Thus, with incorporation of the City's standard conditions, impacts associated with short-term construction noise would be less than significant and no mitigation measures would be required.

Long-Term Operational Noise

Less-than-Significant Impact. Operation of the project would result in the generation of noise both on and off site. Consistent with similar warehouse and light industrial uses, business operations supported by the project would primarily be conducted within the enclosed buildings, except for traffic movement, parking, and loading and unloading of trucks at designated loading bays. As such, on-site operational noise sources are expected to include roof-top air conditioning units, parking lot activity, and truck loading dock activity. Off-site noise could be generated by vehicles, including heavy trucks, accessing the project site and contributing to vehicular roadway noise. As detailed below, these operational project activities would not result in the generation of a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies.

On-Site Operational Noise

Implementation of the project would result in changes to existing noise levels on and around the project site by developing new stationary sources of noise, including introduction of outdoor HVAC equipment. These sources may affect noise-sensitive vicinity land uses off the project site.

The proposed warehouse space overall would not be served by heating or air conditioning equipment. However, the floor plan includes an office with an associated mezzanine space at the northwest building corner and at the

southeast building corner. For the analysis of noise from HVAC equipment operation, a York Model ZF-048 package HVAC unit was used as a reference. Based upon the square footage of the office and mezzanine spaces (10,000 square feet total), it was assumed that two such units would be required for each of the office/mezzanine locations. The York Model ZF-048 package HVAC unit has a sound power rating of 80 dBA (Johnson Controls 2015). Based on the warehouse roof design provided, there will be a 2.8-foot-high parapet extending along the perimeter of the roof, which would minimize sound from the HVAC unit at nearby noise-sensitive land uses.

Assuming all the HVAC equipment is operating simultaneously for a minimum period of 1 hour, the worst-case calculated noise level at each property line and at the nearby residences is presented in Table 24. The maximum hourly noise level for all the HVAC equipment operating at each examined point along the property would range from 25 to 31 dBA L_{eq}, which is well below the City's noise standard for both commercial zoning (70 dBA L_{eq} daytime, 65 dBA L_{eq} nighttime) and residences (60 dBA L_{eq} daytime, 55 dBA L_{eq} nighttime). The noise level calculation spreadsheets for the HVAC package units are included in Appendix G-3, Equipment Specifications and Noise Calculations. Table 24, Mechanical Equipment Operation Noise Summary of Results

Table 24. Mechanical Equipment Operation Noise Summary of Results

	Noise Level at Property Boundary	
Equipment	***Receiver Location***	***Average Noise Level (dBA L_{eq})***
HVAC	N1 (northern property boundary)	30
HVAC	W1 (western property boundary)	31
HVAC	SE1 (southeastern property boundary)	25

Source: Appendix G-3.
Note: dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level (time-averaged sound level); CNEL = Community Noise Equivalent Level; HVAC = heating, ventilation, and air conditioning.
1 Assumes 8:00 a.m. to 5:00 p.m. operation of HVAC unit for office occupancy.

The results of the mechanical equipment operations noise analysis indicate that the project would comply with City and State of California noise standards.

Parking Lot Activity

A comprehensive study of noise levels associated with surface parking lots was published in the Journal of Environmental Engineering and Landscape Management (Baltrėnas et al. 2004). The study found that average noise levels during the peak period of use of the parking lot (generally in the morning with arrival of commuters and in the evening with the departure of commuters) were 47 dBA at 1 meter (3.3 feet) from the outside boundary of the parking lot. The parking area would function as a point source for noise, which means that noise would attenuate at a rate of 6 dBA with each doubling of distance. The employee parking lots are proposed to be situated on the north, east and west sides of the warehouse, no closer than 33 feet from the property line of the project site (from center of drive-aisle to fence) on the western side 45 feet on the northern side, and approximately 60 feet at the southeastern corner. At a distance of 33 feet, parking lot noise levels would be approximately 37 dBA L_{eq} at the western property boundary. At a distance of 45 feet, parking lot noise levels would be approximately 36 dBA L_{eq} at the northern property boundary. At a distance of 60 feet, parking lot noise levels would be approximately 22 dBA L_{eq} at the southeastern property boundary. This noise level is slightly higher than the noise levels from the HVAC equipment operation along the northern and western property boundaries (approximately 30 dBA L_{eq}). Adding together the parking lot noise (36 dBA L_{eq}) and HVAC equipment noise levels (30 dBA L_{eq}), the combined noise level would be approximately 37 dBA L_{eq}, at

the boundary to the north of the project site, which is still well below the City's noise standards for both commercial and residential land uses. Parking lot activity noise levels are summarized in Table 25.

Truck Loading Dock Activity

The parking lot study (Baltrēnas et al. 2004) also examined noise levels associated with cargo truck delivery activity, including noise produced by backup alarms and forklift/yard hostler operations. The study concluded that average noise levels from truck loading/unloading areas was 96 dBA at 1 meter (3.3 feet) from the boundary of the truck activity area. The truck loading dock area (i.e., the truck court) would be located on the northern side of the proposed warehouse building. The loading docks would be located approximately 135 feet from the northern property line and over 200 feet from the western property line. At the southeast property corner, the noise and view of the loading docks would be entirely obstructed by the warehouse building and would be more than 380 feet away. Using the outdoor attenuation rate of 6 dBA with each doubling of distance, truck loading activity along the northern property line would produce noise levels of approximately 63 dBA L_{eq} while noise levels along the western property boundary from truck loading activity would average approximately 58 dBA L_{eq}, not accounting for the shielding effects from the proposed 8-foot high, approximately 6-inches wide, perimeter, concrete wall at the northern boundary and from the building's configuration for receivers to the west. Accounting for this acoustical shielding, the truck loading dock noise at the northern project boundary is estimated to be approximately 54 dBA L_{eq}, at the western project boundary the truck loading dock noise is estimated to be approximately 43 dBA L_{eq}. At the southeastern corner the truck loading dock activity noise (accounting for distance and acoustical shielding) would be approximately 35 dBA. Truck loading dock activity noise levels are summarized in Table 25, along with the other on-site noise sources.

Table 25. Combined On-Site Noise Summary of Results – Noise Levels (*dBA L_{eq}*) at Property Boundaries

Receiver Location	Zoning / Use	Applicable Noise Standard - Daytime (7 a.m. to 10 p.m.) / Nighttime (10 p.m. to 7 a.m.)	HVAC	Parking Lot Activity	Truck Loading Dock Activity	Combined HVAC, Parking Lot and Truck Loading Dock Activities Noise	Applicable Noise Standard Exceeded?
N1 (northern property boundary)	Business Park / Non-conforming residential	70/65 60/55	30	36	54	54	No
W1 (western property boundary)	Residential/ Residential	60/55	31	37	43	44	No
SE1 (southeastern property boundary)	Business Park / Non-conforming residential	70/65	25	22	35	36	No

Source: Appendix G-3.

As shown in Table 25, on-site noise sources associated with the proposed project would not exceed applicable noise standards. Thus, on-site operational noise would be less than significant.

Project-Generated Off-Site Traffic Noise

The project is expected to generate 535 daily trips to the roadway system; in terms of passenger car equivalent (PCE), which accounts for truck percentages, the project would generate 762 daily trips. The project would not result in a doubling of trips on any particular road segment, per existing (Year 2021) and future (Year 2040) traffic data provided by the Project's transportation engineers (Appendix G-4). Typically, a doubling of the energy of a noise source, such as a doubling of traffic volume, would increase noise levels by 3 dBA.[26] Given that it would result in only a modest increase in traffic on local and regional roadways, the project is not expected to result in an increase of 3 dBA or greater on roadways in the study area. The change in noise level due to the project would not be audible. Therefore, impacts associated with off-site project-generated traffic noise would be less than significant.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant Impact. The main concern associated with groundborne vibration is annoyance; however, in extreme cases, vibration can cause damage to buildings, particularly those that are old or otherwise fragile. Some common sources of groundborne vibration are trains and construction activities such as blasting, pile-driving, and heavy earth-moving equipment. The primary source of groundborne vibration occurring as part of the proposed project is construction activity.

Groundborne vibration information related to construction/heavy equipment activities has been collected by Caltrans. Information from Caltrans indicates that transient vibrations (such as from construction activity) with approximately 0.035 inches per second peak particle velocity (PPV) may be characterized as barely perceptible, and vibration levels of 0.24 inches per second PPV may be characterized as distinctly perceptible (Caltrans 2020). The heavier pieces of construction equipment, such as large bulldozers or hoe rams, would register up to approximately 0.089 inches per second PPV at a distance of 25 feet, and a clam shovel drop would measure up to approximately 0.202 inches per second PPV at a distance of 25 feet (FTA 2018).

Groundborne vibration is typically attenuated over relatively short distances. At the nearest existing noise/vibration-sensitive use, distance to the nearest construction area (approximately 30 feet) and with the anticipated construction equipment, the vibration level would be approximately 0.068 inches per second PPV. This vibration level would be above the threshold of "barely perceptible" of 0.035 inches per second PPV but would be below the threshold of "distinctly perceptible" of 0.24 inches per second PPV.

Therefore, the major concern with construction vibration is related to building damage. Construction vibration as a result of the proposed project would not result in structural building damage, which typically occurs at vibration levels of 0.5 inches per second PPV or greater for buildings of reinforced-concrete, steel, or timber construction. There would be no impacts related to groundborne vibration.

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?

Less-than-Significant Impact No private airstrips are located in the project vicinity. The SBIA is located approximately 0.3 miles south of the project site. The project site is located within the Airport Influence

[26] Under normal circumstances (i.e., outside of a controlled setting such as a listening laboratory), a 3 dBA increase in noise levels is considered to be the smallest increase that is audible to the human ear; whereas a less than 3 dBA increase in noise levels is considered to be a barely or non-audible increase.

Area (General Plan Figure 6-7) outlined in the City's General Plan (City of Highland 2006). As required by state law for real estate transactions within the Airport Influence Area, notification/disclosure statements are required to alert potential buyers and tenants of the presence of and potential impacts from the San Bernardino International Airport. According to Exhibit 4H (Existing and Ultimate Noise Contours) of the Airport Layout Plan Narrative Report for San Bernardino International Airport (San Bernardino International Airport Authority 2010), the SBIA's 65 dBA CNEL ultimate noise contour would be located more than 0.5 miles south of the project site.

Policy 1 of Goal 11.1 ("Reduce exposure of people to aircraft noise and overflights, and ensure adequate public notification through buyer awareness measures") within the City's General Plan (City of Highland 2006) states: "Limit the development of sensitive land uses located within the 65 decibel (dB) Community Noise Equivalent Level (CNEL)". The City considers residential dwellings and institutional uses such as hospitals, convalescent homes and churches to be sensitive noise receptors, while retail and office uses are considered to be relatively insensitive land uses. Other land use types, including industrial and manufacturing, are considered to be least impacted by noise. Because the proposed project is not noise-sensitive, and because the project site is located well outside the 65 dBA CNEL noise contour, the proposed project would not expose people residing or working in the project area to excessive noise levels. Thus, aircraft and airport-related noise would be less than significant.

3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING – Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

a) Would the project 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)?

Less-Than-Significant Impact. The project would require a temporary construction workforce and a permanent operational workforce, both of which could potentially induce population growth in the project area. The temporary workforce would be needed to construct the proposed warehouse building and associated improvements. The number of construction workers needed during any given period would

largely depend on the specific stage of construction but will likely average a few dozen workers at any given time throughout the workday. These short-term positions are anticipated to be filled primarily by workers who reside in the project area vicinity. Therefore, construction of the project would not generate a permanent increase in population within the project area.

In terms of operational employees, because the future tenant is not yet known, the number of jobs that the project would generate cannot be precisely determined, but it can be estimated. For purposes of analysis, employment estimates are calculated using average employment density factors reported by SCAG. SCAG reports that for every 1,195 square feet of warehouse space in San Bernardino County, the average numbers of jobs supported is one employee (SCAG 2001). The proposed warehouse would be 305,617 square feet, and as such, the estimated number of employees required for operation would be approximately 256 people.

According to the SCAG Demographics and Growth Forecast, employment in the City is anticipated to grow from 6,900 employees in 2016 to 11,100 employees in 2045 (SCAG 2020). The project-related increase in employment would be minimal in comparison to the anticipated increase in the SCAG Demographics and Growth Forecast.

Additionally, as of March 2021, the California Employment Development Department found that the unemployment rate for Riverside-San Bernardino-Ontario Metropolitan Statistical Area, including the City of Highland, is at 7.7%, which is similar to the state average (8.3%) and higher than the national average (6.0%) for the same period (EDD 2021). Therefore, the project's temporary and permanent employment requirements could likely be met by the City's existing labor force without the need for people to relocate to the project region. The project would not stimulate population growth or a population concentration above what is assumed in local and regional land use plans. Therefore, impacts associated with population growth would be less than significant.

b) ***Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?***

Less-Than-Significant Impact. The eastern and northern portions of the project site are currently developed with three single-family residences. The remainder of the project site is vacant. Development of the proposed project would result in displacement of three existing households. Although it is speculative where the previous on-site residents would ultimately be relocated, assuming that they would be relocated in the project area, vacant housing opportunities are available within the City. The City has approximately 16,854 housing units with a vacancy rate of 5.8% (DOF 2021). As such, there are approximately 978 vacant housing units in the City. Therefore, impacts associated with displacement of housing would be less than significant.

3.15 Public Services

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

a) ***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:***

Fire protection?

Less-than-Significant Impact. The California Department of Forestry and Fire Protection (CAL FIRE) provides fire protection and emergency medical services to the City of Highland, including the project site, through a cooperative agreement that provides for CAL FIRE employees to staff City-owned facilities and apparatus (City of Highland 2006). The City of Highland also has available fire protection services from other area agencies such as the cities of Redlands and Yucaipa, and the U.S. Forest Service (City of Highland 2006). The City also participates in the Statewide Master Mutual Aid Agreement, which provides additional assistance from San Bernardino City and County Fire Departments and the San Manuel Fire Department (City of Highland 2006).

The closest fire station to the project is Highland Fire Department Station No. 543 (7649 Sterling Ave), located approximately 0.9 miles west of the project site. Considering the proximity of the project site to Station No. 543, and given the fact that the project site is already located within CAL FIRE's service area, the project could be adequately served by the various fire departments without adversely effecting personnel-to-resident ratios, response times, or other performance objectives.

In addition, the project would not directly or indirectly induce population growth in the City. Although the project could potentially result in a slight, incremental increase in calls for service to the project site in comparison to the existing conditions, this increase is expected to be nominal and would not result in the need for new CAL FIRE facilities. Nonetheless, similar to other development projects in the City, the project applicant would still be required to pay their fair share of development impact fees to help offset

incremental impacts to fire protection services. Therefore, impacts associated with CAL FIRE facilities and response times would be less than significant.

Police protection?

Less-than-Significant Impact. The City of Highland contracts with the San Bernardino County Sheriff's Department (SBSD) to provide police protection to the City, including the project site (City of Highland 2006). The SBSD has one patrol station in the City of Highland, located at 26985 East Base Line, approximately 0.8 miles northeast of the site.

The project would not directly or indirectly induce population growth in the City. While the project would potentially result in a slight, incremental increase in calls to the SBSD for service to the project site in comparison to the existing conditions, this increase is expected to be nominal and would not result in the need for new SBSD facilities. In addition, the project site is already located within SBSD's service area and would not require an expansion of service area, which could otherwise result in longer response time. Overall, it is anticipated that the project would be adequately served by existing SBSD facilities, equipment, and personnel. Nonetheless, similar to other development projects in the City, the project applicant would still be required to pay their fair share of development impact fees to help offset incremental impacts to police protection services. Therefore, impacts associated with SBSD facilities and response times would be less than significant. In addition, the applicant will be required to follow the City of Highland's Development Impact Fee Ordinance (Fee Ordinance). The Fee Ordinance requires the applicant submit a fee payable to the City which will apply to the funding of public facilities, including law enforcement facilities. Therefore, impacts to police protection resources resulting from the proposed project would be less than significant.

Schools?

No Impact. The project site is located within the San Bernardino City Unified School District. It is not anticipated that people would relocate to the City as a result of the project, and an increase in school-age children requiring public education is not expected to occur as a result of the project. Nonetheless, all residential and non-residential development projects are subject to SB 50, which requires payment of mandatory impact fees to offset any impact to school services or facilities. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA or other state or local laws (Government Code Section 65996). In accordance with SB 50, the project applicant would pay its fair share of impacts fees based on the number/type of dwelling units. These impact fees are required of most residential, commercial, and industrial development projects in the City. Therefore, no impacts associated with school facilities would occur.

Parks?

No Impact. Given the lack of population growth as a result of the project, neither construction nor operation of the project would generate new residents to the extent that new or expanded park facilities would be required. Therefore, no impacts associated with park facilities would occur.

Other public facilities?

No Impact. The project would not directly or indirectly induce substantial population growth in the City. As such, it is unlikely that the project would increase the use of other public facilities such as libraries. Therefore, no impacts associated with libraries and other public facilities would occur.

3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION				
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) ***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?***

No Impact. The project would construct a new warehouse building and associated improvements. The project does not propose any residential uses and would not directly or indirectly result in a substantial and unplanned increase in population growth within the project area. As such, the project would not increase the use of existing neighborhood parks or regional parks in the City and surrounding area. Therefore, no impacts associated with the use of existing residential facilities would occur.

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?***

No Impact. The project would construct a new warehouse building and associated improvements. The project does not propose any recreational facilities. As an industrial use, the project would not require the construction or expansion of recreational facilities. Therefore, no impacts associated with the construction of new or expansion of existing recreational facilities would occur.

3.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION – Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) 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?	☐	☐	☒	☐

The following analysis prepared consistent with the requirements of the City of Highland Public Works Policies, Procedures and Standards for traffic studies (Traffic Study Guidelines) (September 2016), as well as SB 743 and the current CEQA Guidelines for potential impacts to VMT.

Trip Generation Analysis

Trip generation estimates for the project are based on daily and AM and PM peak hour trip generation rates obtained from the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 10th Edition (ITE 2017), using the warehousing land use (ITE Code 150).

Additionally, of the six parcels that comprise the project site, three parcels are developed with residential uses and the remaining three parcels are undeveloped. A portion of the undeveloped parcels is used for equine activities (i.e., horseback riding and grazing). Barns, horse stalls, and a horse corral are located throughout the site. While these residential and equine land uses exist, trip generation estimates for the existing uses could not be determined by available ITE trip rates as specific operations of these existing uses are unknown. In addition to various equine facilities, the residential uses also appear to include potential home-based light-industrial operations. No trip credits for the existing land uses have been assumed in this analysis; therefore, the project's net trip generation estimates are conservative.

PCE factors were also applied to the trip generation estimates to account for truck traffic. The City of Highland indicates that projects with high truck percentages should convert project trips to PCE. A 1.5 PCE factor was applied to 2-axle trucks, 2.0 PCE for 3-axle trucks, and a 3.0 PCE factor was applied to 4-axle trucks per the San Bernardino County Congestion Management Program (CMP). Table 26 presents the project's daily, and AM and PM peak hour trip generation estimates.

Table 26. Project Trip Generation Summary

Land Use	ITE Code	Size/Units		Daily	AM Peak Hour			PM Peak Hour		
					In	*Out*	*Total*	*In*	*Out*	*Total*
Trip Rates[1]										
Warehousing	150	TSF		1.74	0.13	0.04	0.17	0.05	0.14	0.19
Trip Generation										
6th & Victoria Avenue Warehouse	150	307.445	TSF	535	40	12	52	16	43	58
Trip Generation (PCE Adjustments)										
Warehousing Vehicle Mix[2]		Percent[2]								
Passenger Vehicles		72.5%		388	29	9	38	11	31	42
2-Axle Trucks		4.6%		25	2	1	2	1	2	3
3-Axle Trucks		5.7%		30	2	1	3	1	2	3
4+-Axle Trucks		17.2%		92	7	2	9	3	7	10
Project Trip Generation (Non-PCE)				***535***	***40***	***12***	***52***	***16***	***43***	***58***
		PCE Factor[3]								
Passenger Vehicles		1.0		388	29	9	38	11	31	42
2-Axle Trucks		1.5		37	3	1	4	1	3	4
3-Axle Trucks		2.0		61	5	1	6	2	5	7
4+-Axle Trucks		3.0		276	21	6	27	8	22	30
Project Trip Generation (PCE)				762	57	17	74	22	61	83

Notes: TSF = Thousand Square Feet

1 Trip rates from the Institute of Transportation Engineers (ITE), Trip Generation, 10th Edition, 2017.

2 Vehicle Mix and Percent from SCAQMD, Warehouse Truck Trip Study Data Results and Usage, July 2014.

3 Passenger Car Equivalent (PCE) factors per the San Bernardino County Congestion Management Program (CMP), 2016.

As detailed above, the project would generate 535 daily trips, 52 AM peak hour trips (40 inbound and 12 outbound), and 58 PM peak hour trips (16 inbound and 43 outbound). Applying PCE factors for truck traffic, the project would generate 762 daily PCE trips, 74 AM peak hour PCE trips (57 inbound and 17 outbound), and 83 PM peak hour PCE trips (22 inbound and 61 outbound).

a) ***Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?***

Less-than-Significant Impact. As detailed in the following text, the project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Roadway Facilities

The project is located within the jurisdiction of the City of Highland; therefore, the following consistency requirements would apply.

San Bernardino Associated Governments Congestion Management Plan

The City of Highland is located in San Bernardino County and therefore, the San Bernardino County Transportation Authority CMP applies to the City. To address the increasing public concern that traffic congestion is impacting the quality of life and economic vitality of the State of California, Proposition 111 created the CMP in 1990. The intent of the CMP is to provide the analytical basis for transportation decisions through the State Transportation Improvement Program process. In 1990, the San Bernardino Associated Governments was designated the Congestion Management Agency (CMA) for San Bernardino County. Although implementation of the CMP was made voluntary by the passage of AB 2419 (Bowler 1996), the CMP requirement has been retained in San Bernardino County.

The LOS at each CMP location is monitored by local jurisdictions in order to implement the statutory requirements of the CMP. If LOS standards deteriorate, then local jurisdictions must prepare a deficiency plan to meet conformance standards outlined by the countywide plan. The local CMP requires that a TIA report be prepared when a project's trip generation exceeds 250 two-way peak hour trips and expects to add at least 50 two-way peak hour trips to a State highway facility. For the CMP roadway system, the LOS standard shall be E for all segments and intersections except those designated LOS F, as listed in Table 2-1 of the CMP (SANBAG 2016). The nearest CMP facility is the intersection of Victoria Avenue/5th Street.

Based on the project's trip generation estimates as described above, development of the proposed project would not be likely to result in degradation of the nearby CMP facilities due to the low volume of vehicular traffic (less than 250 peak hour trips, and less than 50 peak hour trips to a State highway facility, per the CMP). Therefore, impacts associated with project-related traffic on both the local and regional circulation system would be less than significant.

City of Highland

Traffic Study Guidelines

The City of Highland Traffic Study Guidelines are included in Chapter 9 of the City's Public Works Policies, Procedures and Standards Manual. Although changes in CEQA regarding SB 743 implementation shifts the primary metric for traffic analyses from LOS to VMT, the City has not yet adopted updated guidelines or thresholds related to VMT. As such, the City continues to require a Traffic Report to analyze the surrounding transportation network to evaluate the project's effect on the City's transportation infrastructure, and identify improvements required to maintain consistency with the City's LOS standards. Per the Traffic Study Guidelines, a Traffic Report would be required if a project exceeds the CMP thresholds (250 two-way peak hour trips) or generates more than 1,000 new two-way daily trips, or 100 two-way peak hour trips. Additionally, the City may require a Traffic Report if there are concerns regarding access, roadway structural impacts or level of service on intersection or roadway segments adjacent to the project. Trip generation estimates for the project are summarized above.

Based on the project's trip generation estimates as described above, development of the proposed project would likely not result in degradation of the nearest intersections of Grape Street/6th Street, Victoria Avenue/6th Street, or other nearby intersections due to the low volume of vehicular traffic (less than 100 peak hour trips). However, the scoping of a focused Traffic Report is in progress with the City and is subject to review and approval by the City prior to project approval. By proceeding with scoping of a Traffic Report,

the project complies with and would not conflict with the City's Traffic Study Guidelines. Therefore, impacts would be less than significant.

General Plan Circulation Element

The City of Highland adopted its most recent version of the General Plan in March 2006. The General Plan Circulation Element takes into consideration transit, bicycle, pedestrian, and other multimodal uses. The Circulation Element primarily utilizes volume-to-capacity LOS as a measurement in the rating of the performance of streets. The Circulation Element establishes the following LOS criteria:

- *LOS D or better for major intersections in the City.*
- *LOS D is considered acceptable for peak operating periods.*
- *Any City of Highland intersection operating at LOS "E" or "F" is considered deficient.*

As the proposed project is forecast to generate 74 AM peak hour trips and 83 PM peak hour trips (PCE-adjusted), the proposed project would not exceed the 250 two-way peak hour trip threshold for the preparation of a TIA per the CMP or the 100 two-way peak hour trip threshold for preparation of a Traffic Report per the City's Traffic Study Guidelines. Therefore, a TIA and further LOS analysis would not be required, unless requested by the City for a focused analysis of specific facilities as noted above.

Additionally, the project site is bordered by 6th Street to the south, Grape Street to the west, and Victoria Avenue to the east. Grape Street does not have a designated Circulation Element roadway classification; however, 6th Street as a Collector Street and Victoria Avenue is designated as a Major Highway. Per the Circulation Element, a Collector Street is generally a two-lane roadway intended to carry traffic between residential and commercial land uses, with a 44-foot, curb-to-curb width within a 66-foot ROW. The project would not conflict with the right-of-way along 6th Street.

Per the Circulation Element, a Major Highway is generally designed as a four-lane roadway intended to provide nonlocal through trips and limited local access, with an 88-foot curb-to-curb width (with a 12-foot median), within a 104-foot ROW. Although Victoria Avenue is not currently built out to its ultimate ROW, and does not include a 12-foot center median, the Circulation Element notes that Victoria Avenue is designated as a Major Highway to preserve adequate ROW for the Airport entry and accommodate future traffic. Additionally, the Circulation Element notes the potential for a new interchange for I-210 at Victoria Avenue to the north, as Victoria Avenue is identified as the "major entryway into the San Bernardino International Airport and [serves] as a the linkage between the Airport and San Manuel Indian Casino and Bingo facility." The project would provide the required 52-foot half-width required to satisfy the ultimate ROW and would not conflict with future build-out of the roadway. Therefore, impacts related to project consistency with the General Plan Circulation Element would be less than significant.

Pedestrian and Bicycle Facilities

Although the General Plan Circulation Element includes several bicycle classifications, the City of Highland Active Transportation Plan, adopted February 2021, provides a more comprehensive and updated overview of the City's current and future recommendations to enhance multi-modal facilities:

Class I Shared-Use Paths are paths completely separated from motor vehicle traffic used by people for walking and biking. These paths are typically located immediately adjacent and parallel to a roadway or in its own independent ROW, such as within a park or along a body of water.

Class II Bicycle Lanes are dedicated lanes for bicycle travel adjacent to traffic. A painted white line separates the bicycle lane from motor vehicle traffic.

Class IIB Buffered Bicycle Lane are dedicated lanes for bicycle travel separated from vehicle traffic by a painted buffer. The buffer provides additional comfort for users by providing space from motor vehicles or parked cars.

Class III Bicycle Routes are signed bike routes that people biking share with motor vehicles, which can include pavement markings.

Class IIIB Bicycle Boulevards are calm, local streets where bicycles have priority but share roadway space with motor vehicles. These boulevards include shared roadway bicycle markings on the pavement as well as traffic calming features such as speed humps and traffic diverters to keep these streets more comfortable for bicycles.

No existing bicycle facilities exist adjacent to the project site. The nearest proposed facility would include a Class II Bicycle Lane along Victoria Avenue, adjacent to the project site, extending from 5th Street to Sparks Street. The proposed project would provide the frontage required of the ultimate ROW of Victoria Avenue (52 feet), designated as a Major Highway in the Circulation Element. The Major Highway roadway cross section allocates 8 feet to bike lanes on both sides of the roadway. As such, the project would not conflict with existing or proposed bicycle facilities, and impacts would be less than significant.

Site analysis of the project area does not indicate existing sidewalk and pedestrian facilities along the full extents of adjacent and nearby streets in the vicinity of the project site. However, the Active Transportation Plan includes proposed recommendations for the buildout of sidewalks and paths along Grape Street and Victoria Avenue adjacent to the project site, along with curb treatments at the intersections of Grape Street/6th Street and Victoria Avenue/6th Street. Additionally, the project includes frontage improvements, including sidewalks and paths along all project frontages. As such, development of the project would not conflict with the existing pedestrian facilities, and impacts would be less than significant.

Transit Facilities

Omnitrans provides public transportation throughout the San Bernardino Valley and would serve as the nearest transit service to the project site. The nearest Omnitrans bus stop serves Route 15, located approximately 0.30 miles north of the project site at the intersection of Victoria Avenue/9th Street. Route 15 operates between the Fontana Metrolink Transit Center and the City of Redlands via the Cities of Rialto, San Bernardino, and Highland, with a peak service frequency of 60 minutes throughout the week. Development of the proposed project would not conflict with the existing bus routes or bus stops. Therefore, impacts to transit would be less than significant.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less-than-Significant Impact. As shown in the analysis below, based on City's recommended thresholds, the Project generated VMT and the Project's effect on VMT would result in a less than significant impact.

On September 27, 2013, Senate Bill (SB) 743 was signed into law, which created a process to change the way that transportation impacts are analyzed under CEQA. SB 743 required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. Under the transportation guidelines, LOS, or vehicle delay, will no longer be considered an environmental impact under CEQA. The updates to the CEQA Guidelines required under SB 743 were approved on December 28, 2018. These guidelines identify VMT as the most appropriate measure of transportation impacts under CEQA as of July 1, 2020.

VMT Screening

The following screening criteria were analyzed per the San Bernardino County Transportation Authority (SBCTA) Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (SBCTA Guidelines), per direction from the City in lieu of formally adopted City VMT guidelines. Any one of the following criteria would need to be satisfied in order to screen-out of significant VMT impacts:

- ***Projects generating less than 110 daily trips:*** The proposed Project is the construction and development of 307,445 SF of warehousing buildings, estimated to generate 535 ADT as shown in Table 3.17-1. Therefore, the Project would not fall under the threshold for projects generating less than 110 ADT.
- ***Local serving retail less than 50,000 SF:*** The proposed Project does not include retail components. Therefore, the Project is not considered a local serving retail project and cannot be screened out from further VMT analysis using this criterion.
- ***Local Serving Projects:*** The proposed Project would not be categorized as a local serving land use. Therefore, the Project cannot be screened out from further VMT analysis using this criterion.
- ***Affordable Housing (100 percent of units):*** The proposed Project does not include affordable housing units. Therefore, the Project cannot be screened out from further VMT analysis using this criterion.
- ***Transit Priority Area (TPA) Screening:*** Projects located within a TPA[27] as determined by the most recent RTP/SCS. As shown in Appendix G, the proposed Project is not located within a TPA. Therefore, it cannot be screened out using this criterion.
- ***Low VMT Area Screening:*** Per the SBCTA Guidelines, "Residential and office projects located within a low VMT-generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary. In addition, other employment-related and mixed-use land use projects may qualify for the use of screening if the project can reasonably be expected to generate VMT per resident, per worker, or per service population (SP) that is similar to the existing land uses in the low VMT area."

  The SBCTA VMT Screening Tool (Screening Tool) was used to determine whether the proposed Project would be in a low VMT-generating area. The City's recommend guidance defines a low VMT generating area as one in which the proposed Project is located within a Traffic Analysis Zone (TAZ) where the VMT per service population is lower than City of Highland future buildout VMT per SP. TAZs are geographic polygons similar to Census block groups used to represent areas of

27 Per Public Resources Code section 21099(a)(7) a "Transit priority area" means an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations. For purposes of SB 743, a transit priority area also includes major transit stops that are scheduled to be completed within the planning horizon of the RTP/SCS.

homogenous travel behavior. Based on the Screening Tool results and as shown in Table 4.10-2 (Appendix H), the Project would be located within a low VMT generating zone as compared to the City recommended threshold.

Table 4.10-2. Summary of Project TAZ VMT

Base Year (2021)	VMT
PA VMT Per Service Population	
Project TAZ	15.0
City Future Buildout	22.5
% Difference (Project TAZ – City)	**-33.43%**
Threshold	28.2

Source: SBCTA VMT Screening Tool (Appendix H)
Note: TAZ = Traffic Analysis Zone; VMT = vehicle miles traveled; OD = origin-destination

As shown in the table, the PA VMT per SP for the Project TAZ is 15.0, and the County's OD VMT per SP is 33.2. Therefore, the TAZ would be 33.43% below the City's threshold, and would meet the low VMT screening criteria. However, the TAZ for which the Project resides does not include any industrial employment and therefore would not be reflective of the Project's proposed land use. Therefore, the Project cannot be screened out using the low VMT area screening criterion.

As the proposed Project would not meet the City's recommended screening criteria, a Project level detailed VMT analysis is required.

VMT Analysis

The City requires the evaluation of project generated VMT as well as project's effect on VMT to be analyzed in detail for projects that do not meet any of their screening criteria. The calculation of VMT for land use projects is based on the total number of trips generated and the average trip length of each vehicle. The SBCTA Guidelines identify the San Bernardino Transportation Analysis Model (SBTAM) as the appropriate tool to conduct a detailed VMT analysis for land use projects. The technical memorandum describing the SBTAM model run for VMT by sub-consultant Urban Crossroads is included in Appendix H.

Project VMT

The SBTAM is trip-based regional travel demand model that considers interaction between different land uses based on socio-economic data such as population, households, and employment. Project VMT has been calculated using the most current version of SBTAM. Adjustments in socio-economic data (i.e., employment) were made to the appropriate TAZ within the SBTAM model to reflect the Project's proposed warehousing land use. The Project socio-economic data is consistent with the employment density factors for San Bernardino County from the SCAG Employment Density Survey (October 31, 2001). Based on number of employees estimated using Table II-B of the SCAG study (1 employee per 1,195 square feet), the Project was coded with 257 employees.

The Project generated VMT is defined as the VMT attributed to vehicle trips to and from the Project zone or zones. Based on the City's recommended thresholds, if a project generated VMT per service

population exceeds City of Highland average VMT per service population, the Project would create significant impact under CEQA.

Project generated VMT is extracted from the SBTAM model using the production attraction (PA) trip matrices. The PA matrices are then multiplied by the final assignment (distance) skims. Project generated baseline VMT was calculated from the baseline travel forecasting model which was also used to establish the City's VMT threshold. Additionally, the project generated VMT was calculated in the cumulative travel forecasting model to estimate VMT in cumulative conditions. Project VMT was then normalized by dividing by the Project's service population (SP) (i.e., estimated number of employees for industrial type uses) for their respective baseline and cumulative conditions. This calculation changes the raw VMT value into an efficiency metric for ease of comparison. As the Project does not contain residential land uses, the service population consists entirely of the Project's employment. Project generated VMT was calculated for both the base year model (2016) and cumulative year model (2040) and linear interpolation was used to determine the baseline (2021) project generated VMT. Table 4.10-3 summarizes the findings of this evaluation.

Table 4.10-3. Summary of Project VMT per SP

	Base year (2016)	Cumulative (2040)	Baseline (2021)
Service Population (SP)	257	257	257
VMT	5,647	5,344	5,605
VMT/SP	22.07	20.87	21.90

Note: VMT = vehicle miles traveled
Source: SBTAM Model Results; (Appendix H)

VMT Impact Determination

As noted above, the City of Highland has not adopted VMT-specific guidelines or thresholds as of June 2021. In lieu of available guidelines, City Staff have identified the following recommended threshold for findings of less than significant:

- The baseline project-generated VMT per service population below future buildout City of Highland VMT per service population, or
- The cumulative project-generated VMT per service population below future buildout City of Highland VMT per service population.

As shown in the Table 4.10-4 below, the City average VMT is 22.51 VMT/SP under future buildout (Year 2040) conditions. As shown, the Project's VMT per SP would be 2.71 percent below the City's impact threshold for baseline conditions and 7.29 percent below the City's impact threshold for cumulative conditions. Because the Project generated VMT per SP does not exceed the future buildout City of Highland VMT per SP in either the baseline or cumulative conditions, the Project generated VMT impact would be less than significant.

Table 4.10-4. Project VMT per SP Comparison

	Base year (2021)	Cumulative (2040)
City Future Buildout VMT per SP	22.51	22.51
Project-generated VMT per SP	21.90	20.87

Table 4.10-4. Project VMT per SP Comparison

	Base year (2021)	Cumulative (2040)
Percent Change	-2.71%	-7.29%
Potentially Significant?	No	No

Note: VMT = vehicle miles traveled; SP = Service Population
Source: SBTAM Model Results; (Appendix H)

While the project's VMT impacts would be less than significant, several regulatory requirements, project design features, and existing conditions would further facilitate a reduction in project VMT. First, the project would provide bicycle facilities (i.e., permanently anchored bike racks) on the project site and along Victoria Avenue (i.e., dedication of land for the future construction of an 8-foot bike lane) to facilitate bike travel to and from the project site in lieu of single-passenger automobile trips. The project would also facilitate carpooling and vanpooling by providing parking spaces designated for low-emitting, fuel-efficient and carpool/van pool vehicles, as required by Title 24. Additionally, the project site is located along Omnitrans Route 15. Together, these measures would provide future employees of the project several alternative modes to using single-passenger vehicles to access the project site.

c) ***Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?***

Less-than-Significant Impact. Access to the project site would be provided by two driveways along Grape Street and two driveways along Victoria Avenue. The northernmost driveways along each street would serve as truck access driveways, with the southernmost driveways dedicated to passenger vehicle access only. Passenger vehicles would also be permitted to utilize the northern driveways. Per discussion with the City, both the northern and southern Victoria Avenue driveway would be restricted to right-in/right-out only access due to its proximity to the Victoria Avenue/6th Street intersection, and future plans for a center median along Victoria Avenue.

As discussed previously, Victoria Avenue is not yet built to its ultimate ROW and does not have an existing 12-foot center median along the project frontage.

The project would construct frontage improvements of existing segments of Grape Street, 6th Street, Victoria Avenue, and new driveways for project access.

During site plan review, the internal roadway and driveway widths, curb radii to facilitate passenger car and truck turning and movement would be reviewed, designed, and constructed per City standards and applicable street design requirements.

For on-site construction and any improvements required within the public ROW, the proposed project would be required to comply with standards set forth by the City to ensure that the project does not introduce an incompatible design feature that would impede traffic flow on roadway facilities. There would be no incompatible or hazardous uses associated with the proposed project and impacts would be less than significant.

d) ***Would the project result in inadequate emergency access?***

Less-than-Significant Impact. Site access would be provided via two driveways along Grape Street and two driveways along Victoria Avenue. Emergency vehicle access will be available at all driveways and facilitated

within the entirety of the project site. The project site would be accessible to emergency responders during construction and operation of the project. Therefore, impacts associated with an emergency response plan or emergency evacuation plan would be less than significant.

3.18 Tribal Cultural Resources

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

The evaluation of potential impacts to Tribal Cultural Resources is based on the findings resulting from tribal consultation conducted by City of Highland (City), as the lead agency, as well as the findings of the Archaeological Resources Assessment conducted by Dudek in 2021 (Appendix C-2). Background research conducted to inform this analyses and provide data upon request of interested Native American representatives included a Native American Heritage Commission (NAHC) Sacred Land Files (SLF) search, ethnographic research, archival research and California Historical resources Information System (CHRIS) database records search all of which are briefly provided in this section.

Existing Setting – Ethnohistoric

The history of the Native American communities prior to the mid-1700s has largely been reconstructed through later mission-period and early ethnographic accounts. The first records of the Native American inhabitants of the region come predominantly from European merchants, missionaries, military personnel, and explorers. These brief, and generally peripheral, accounts were prepared with the intent of furthering respective colonial and economic aims and were combined with observations of the landscape. They were not intended to be unbiased accounts regarding the cultural structures and community practices of the newly encountered cultural groups. The

establishment of the missions in the region brought more extensive documentation of Native American communities, though these groups did not become the focus of formal and in-depth ethnographic study until the early twentieth century (Bean and Shipek 1978; Boscana 1846; Harrington 1934; Laylander 2000; Sparkman 1908; White 1963). The principal intent of these researchers was to record the precontact and culturally specific practices, ideologies, and languages that had survived the destabilizing effects of missionization and colonialism. This research, often understood as "salvage ethnography," was driven by the understanding that traditional knowledge was being lost due to the impacts of modernization and cultural assimilation. Alfred Kroeber applied his "memory culture" approach (Lightfoot 2005, p. 32) by recording languages and oral histories within the region. Ethnographic research by Dubois, Kroeber, Harrington, Spier, and others during the early twentieth century seemed to indicate that traditional cultural practices and beliefs survived among local Native American communities.

It is important to note that even though there were many informants for these early ethnographies who were able to provide information from personal experiences about native life before the Europeans, a significantly large proportion of these informants were born after 1850 (Heizer and Nissen 1973); therefore, the documentation of precontact, aboriginal culture was being increasingly supplied by individuals born in California after considerable contact with Europeans. As Heizer (1978) stated, this is an important issue to note when examining these ethnographies, since considerable culture change had undoubtedly occurred by 1850 among the Native American survivors of California.

Based on ethnographic information, it is believed that at least 88 different languages were spoken from Baja California Sur to the southern Oregon state border at the time of Spanish contact (Johnson and Lorenz 2006, p. 34). The distribution of recorded Native American languages has been dispersed as a geographic mosaic across California through six primary language families (Golla 2007).

Golla contended that one can interpret the amount of variability within specific language groups as being associated with the relative "time depth" of the speaking populations (Golla 2007, p. 80). A large amount of variation within the language of a group represents a greater time depth than a group's language with less internal diversity. One method that he has employed is by drawing comparisons with historically documented changes in Germanic and Romantic language groups. Golla observed that the "absolute chronology of the internal diversification within a language family" can be correlated with archaeological dates (2007, p. 71). This type of interpretation is modeled on concepts of genetic drift and gene flows that are associated with migration and population isolation in the biological sciences.

The tribes of this area have traditionally spoken Takic languages that may be assigned to the larger Uto-Aztecan family (Golla 2007, p. 74). These groups include the Gabrielino, Cahuilla, and Serrano. Golla interpreted the amount of internal diversity within these language-speaking communities to reflect a time depth of approximately 2,000 years. Other researchers have contended that Takic may have diverged from Uto-Aztecan ca. 2600 BC–AD 1, which was later followed by the diversification within the Takic speaking tribes, occurring approximately 1500 BC–AD 1000 (Laylander 2000).

Serrano

Traditionally, the Serrano lived in an area east of the Gabrielino and north of the Cahuilla, near present-day western San Bernardino County and northeastern Los Angeles County (Laylander 2000). The Serrano occupied an area in and around the San Bernardino Mountains between approximately 1,500 and 11,000 feet above mean sea level. Their territory extended west along the northern slope of the San Gabriel Mountains, east as far as Twentynine Palms, north along the Mojave River, and south to the San Jacinto area. Kroeber (1925) divided the Serrano into four distinct groups within the

western Mojave Desert: the Kitanemuk, Tataviam, Serrano, and Vanyume. Each group held a distinct territory within the region (Kroeber 1925). According to Bean and Smith (1978a, p. 570), "the Serrano resided in an area that extended east of the Cajon Pass, located in the San Bernardino Mountains, to Twenty-nine Palms, the north foothills of the San Bernardino Mountains and south to include portions of the Yucaipa Valley."

Serrano social organization was based on patrilineal and patrilocal lineages. Exogamy rules required that a man could not marry a woman related to them within five generations. Women moved to their husband's village, but kept their identity as a member of their natal lineage (Cultural Systems Research 2005:15).

The Serrano were mainly hunters and gatherers who occasionally fished. Game hunted included mountain sheep, deer, antelope, rabbits, small rodents, and various birds, particularly quail. Vegetable staples consisted of acorns, piñon nuts, bulbs and tubers, shoots and roots, berries, mesquite, barrel cacti, and Joshua tree (Bean and Smith 1978a; Cultural Systems Research 2005:15). A variety of materials was used for hunting, gathering, and processing food, as well as for shelter, clothing, and luxury items. Shells, wood, bone, stone, plant materials, and animal skins and feathers were used for making baskets, pottery, blankets, mats, nets, bags and pouches, cordage, awls, bows, arrows, drills, stone pipes, musical instruments, and clothing (Bean and Smith 1978a).

The majority of the Serrano lived in small villages, close to sources of fresh water (Benedict 1924). Houses and ramadas were round, dome-shaped, and constructed of poles covered with bark and tule mats (Benedict 1924; Kroeber 1925). The Serrano also had sweat houses and ceremonial houses for religious activities. Further, according to Benedict (1924), a typical Serrano settlement was a village with multiple small satellite camps surrounding it. Most Serrano villages also had a ceremonial house used as a religious center. Other structures within the village might include granaries and sweathouses (Bean and Smith 1978a). According to DeBarros (2004), one of the more prominent Serrano villages was called Guapiabit, and it was located in Summit Valley.

Gabrieliño/Tongva

The archaeological record indicates that the Gabrielino arrived in the Los Angeles Basin around 500 B.C. Surrounding native groups included the Chumash and Tataviam to the northwest, the Serrano and Cahuilla to the northeast, and the Juaneño and Luiseño to the southeast.

The names by which Native Americans identified themselves have, for the most part, been lost and replaced by those derived by the Spanish people administering the local Missions. These names were not necessarily representative of a specific ethnic or tribal group, and traditional tribal names are unknown in the post-Contact period. The name "Gabrieliño" or "Gabrieleño" was first established by the Spanish from the San Gabriel Mission and included people from the established Gabrielino area as well as other social groups (Bean and Smith 1978b; Kroeber 1925). Some contemporary Gabrieliño identify themselves as descendants of the indigenous people living across the plains of the Los Angeles Basin and refer to themselves as the Tongva (King 1994, p. 12). This term is used in the remainder of this section in addition to the name "Gabrieleño" to refer to the precontact inhabitants of the Los Angeles Basin and their descendants.

The Gabrieleño/Tongva established large, permanent villages along rivers and streams, and lived in sheltered areas along the coast. Gabrieleño/Tongva lands included the greater Los Angeles Basin and three Channel Islands—San Clemente, San Nicolas, and Santa Catalina—and stretched from the foothills of the San Gabriel Mountains to the Pacific Ocean. Archaeological sites composed of villages with various sized structures have been identified through the Los Angeles Basin. A total tribal population has been estimated of at least 5,000 (Bean and Smith 1978b, p.540), but recent ethnohistoric work suggests a number approaching 10,000 seems more likely (O'Neil 2002). At

least one Gabrieleño/Tongva village was located near Glendora: Ashuukshanga (also Azucsagna), located near the mouth of the San Gabriel River in present-day Azusa (McCawley 1996, p. 44). Within the permanent village sites, the Gabrieleño/Tongva constructed large, circular, domed houses made of willow poles thatched with tule, each of which could hold upwards of 50 people (Bean and Smith 1978b). Other structures constructed throughout the villages probably served as sweathouses, menstrual huts, ceremonial enclosures, and communal granaries. Cleared fields for races and games, such as lacrosse and pole throwing, were created adjacent to Tongva villages (McCawley 1996).

The Gabrieleño/Tongva subsistence economy was centered on gathering and hunting. The surrounding environment was rich and varied, and the tribe exploited mountains, foothills, valleys, and deserts as well as riparian, estuarine, and open and rocky coastal eco-niches. Like most native Californians, acorns were the staple food (an established industry by the time of the early Intermediate Horizon). Acorns were supplemented by the roots, leaves, seeds, and fruits of a variety of flora (e.g., islay, cactus, yucca, sages, and agave). Freshwater and saltwater fish, shellfish, birds, reptiles, and insects, as well as large and small mammals, were also consumed (Bean and Smith 1978b, p. 546; Kroeber 1925, pp. 631–632; McCawley 1996, pp. 119–123, 128–131).

The Gabrieleño/Tongva participated in an extensive exchange network, trading coastal goods for inland resources. They exported Santa Catalina Island steatite products, roots, seal and otter skins, fish and shellfish, red ochre, and lead ore to neighboring tribes, as well as to people as far away as the Colorado River. In exchange, they received ceramic goods, deerskin shirts, obsidian, acorns, and other items. This burgeoning trade was facilitated by the use of craft specialists, a standard medium of exchange (Olivella bead currency), and the regular destruction of valuables in ceremonies, which maintained a high demand for these goods (McCawley 1996, pp. 112–115).

Assembly Bill 52

AB 52 of 2014 amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 established that tribal cultural resources must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency. PRC Section 21074 describes a tribal cultural resource as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American Tribe. A tribal cultural resource (TCR) is either:

- On the CRHR or a local historic register;
- Eligible for the CRHR or a local historic register; or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in ©division (c) of PRC Section 5024.1.

AB 52 formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the project area, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report by contacting those tribal groups who have previously provided formal written request for notification of projects under the agency's jurisdiction.

Section 1 (a)(9) of AB 52 establishes that "a substantial adverse change to a tribal cultural resource has a significant effect on the environment." Effects on TCRs should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures "capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource." Further, if a California Native American tribe requests consultation

regarding project alternatives, mitigation measures, or significant effects to TCRs, the consultation shall include those topics (PRC Section 21080.3.2[a]). Finally, the environmental document, for which the tribal consultation is focused, and the mitigation monitoring and reporting program (where applicable), developed in consideration of information provided by tribes during the formal consultation process, shall include any mitigation measures that are adopted (PRC Section 21082.3[a]).

Assembly Bill 52 Consultation

The project is subject to compliance with AB 52 (PRC 21074), which requires consideration of impacts to TCRs as part of the CEQA process, and that the lead agency notify California Native American Tribal representatives (that have requested notification) who are traditionally or culturally affiliated with the geographic area of the proposed project. All NAHC-listed California Native American Tribal representatives that have requested project notification pursuant to AB 52 were sent letters by the City on June 17, 2021, via USPS certified mailing and email. The notification letters contained a project description, outline of AB 52 timing, an invitation to consult, a project site plan, and contact information for the appropriate lead agency representative. Table 28 summarizes the results of the AB 52 process for the project.

Table 28. Assembly Bill 52 Native American Heritage Commission–Listed Native American Contacts

Native American Tribal Representatives	Response Received
Andrew Salas, Chairman Gabrieleno Band of Mission Indians – Kizh Nation	**June 18, 2021:** City Associate Planner Salvador Quintanilla sent a a follow up email to Brandy Salas, Admin Specilialist, for the Gabrieleno Band of Mission Indians – Kizh Nation (Kizh Nation). Ms. Salas responded the same day acknowledging receipt of the email from Mr. Quintanilla. **June 22, 2021:** Mr. Quintanilla sent a a follow up email to Ms. Salas and provided a copy of the project site plan for reference and also followed up with a phone call. **June 23, 2021:** Ms. Salas responded to Mr. Quintanilla's outreach and offered two dates for a phone consultation: August 12th and 18th, 2021. **August 5, 2021:** Ms. Salas reached out to Mr. Quintanilla indicating that there would be a delay due to Chairman Salas' availability. City Assistant Community Development Director, Kim Stater, responded confirming that an electronic submittal of documents from the Kizh Natoin was acceptable. **August 6, 2021:** Ms. Salas responded to the Ms. Stater and stated that the Kizh Nation would provide information requested by Ms. Stater. Ms. Salas also requested the project address. **August 9, 2021:** Ms. Stater responded to Ms. Salas and stated that the project includes more than one address and provided a general breakdown of the project site location and attached the project site plan and information on the proposed project.

Table 28. Assembly Bill 52 Native American Heritage Commission–Listed Native American Contacts

Native American Tribal Representatives	Response Received
	August 13, 2021: Ms. Salas responded to Ms. Stater, acknowledging receipt of the previous email and again stated that the Kizh Nation would provide the information requested by Ms. Stater. **September 24:** Ms. Stater followed up with Ms. Salas and requested the promised electronic files. **September 244, 2021:** Ms. Salas responded to Ms. Stater acknowledging receipt of the previous email and stated that the Kizh Nationwould provide the information requested by Ms. Stater. Ms. Salas provided Ms. Stater with mitigation language and requested the City's concurrence. **October 4, 2021:** Ms. Salas provided Ms. Stater with additional files, including screenshots of two historical maps overlaid on Google Earth and the pinned location of the project site and screen shotes of text from five literary sources and explanatory text for each file provided. The files provided references to rancherias, trade routes and hydrographys or waterways around the project area as well as information regarding a Gabrieleno community. Additional documents provided to the City include a letter from Dr. E. Gary Stickel to Chairman Salas dated August 22, 2018 regarding Cultural Resource Management (CRM) monitoring. In this letter, Dr. Stickel discusses the inadequacy of an archaeological pedestrian survey for the identification of subsurface cultural material, the use of ground penetrating radar (GPR) to detect unknown burials prior to project construction, and the reliability of the use of a GPR, and a statement of the use of a monitoring program for project compliance. Additionally, Dr. Stickel states that the only exception of a monitoring program would be when a subject property has been extensively disturbed and all soil deposits to contain cultural material has been removed and/or destroyed. The Kizh Nation also included a screenshot of an email from NAHC analyst, Frank Lienert, which stated that negative SLF searches do not preclude the existence of sites within the search area, which is explicitly stated on all negative SLF search results. The NAHC email also states that they recommend that the SLF search requestor contact all tribes on the consultation lists. Additionally, the Kizh Nation provided a letter from the SCCIC noting that the absence of archaeological resources within a specific area does not mean that no such resources exists and that there is always a chance that there are unrecorded archaeological resources on the surface or buried within an area. Based on the provided information, the Kizh Nation believes that there is a higher than average potential to impact tribal cultural resources within the project site. As such, the Kizh Nation provided the City with proposed mitigation measures for the

Table 28. Assembly Bill 52 Native American Heritage Commission–Listed Native American Contacts

Native American Tribal Representatives	Response Received
	project, which includes the requirement for a Native American Monitor to be present during all ground disturbing activities and the implementation of various protocols and procedures in the event that tribal cultural resources, archaeological resources, and/or human remains are identified within the project site. To date, no additional responses have been received by the City from the Kizh Nation.
Joseph Ontiveros Cultural Resources Director Soboba Band of Luiseno Indians	No response has been received to date.
Lee Clauss, Director Cultural Resources Management Department San Manuel Band of Mission Indians (SMBMI)	**June 22, 2021:** An email response was received by City Associate Planner Salvador Quintanilla from Ryan Nordness, Cultural Resource Analyst for the SMBMI via email. Mr. Nordness provided mitigation language and requests that it be included for the project permit and planning. **June 24, 2021:** Mr. Nordness sent a follow-up email to Mr. Quintanilla and stated that the proposed project area is within Serrano ancestral territory and requested to review the cultural and geotechnical report for the project, including project plans showing the depths of proposed ground disturbance. Mr. Quintanilla provided the cultural and geotechnical report on June 29, 2021. A second email was sent to the City on this date by Mr. Nordness referencing consultation under SB 18 and stating that no additional consultation under SB 18 would be required. It is important to note that the project does not include any amendments to the General or Specific Plan and therefore, SB 18 does not apply to the project. Nonetheless, this record is documented to ensure all communication received by the City as part of the consultation process is provided. **August 3, 2021:** After reviewing the project materials, Mr. Nordness sent a follow-up email to Mr. Quintanilla and stated that the proposed project area is within Serrano ancestral territory, however, due to the nature and location of the project and the CRM Department's present knowledge, the SMBMI does not have any concerns with the project as planned at this time. Mr. Nordness then provided mitigation language and requested that it be included for the project permit and planning. Mr. Nordness also requested to be provided a final copy of the project permit and planned to review the included language. To date, no additional responses have been received by the City from the SMBMI.
Dan Little Chief Intergovernmental Affairs Officer San Manuel Band of Mission Indians	No response has been received to date.

Table 28. Assembly Bill 52 Native American Heritage Commission–Listed Native American Contacts

Native American Tribal Representatives	Response Received
Michelle Hickey VP/Associate General Counsel San Manuel Band of Mission Indians	No response has been received to date.
Peter Mateo Director of Tribal Planning & Development San Manuel Band of Mission Indians	No response has been received to date.

a) ***Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:***

i) ***Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?***

Less-than-Significant Impact with Mitigation Incorporated. As described under Section 3.5 of this document, a CHRIS records search and NAHC SLF search were conducted for the project site. The SLF was completed with positive results; however, it should be noted that the results relate to the general regional area do not necessarily equate to the existence of resources within the specific area occupied by the proposed project site. The results of the CHRIS records search identified 23 historic built environment resources within the records search area. No prehistoric resources were identified as a result of the records search. South Central Coastal Information Center records also indicate that that 13 previous cultural resources investigations have been conducted within one-half mile of the proposed project site between 1979 and 2013. No cultural resources were identified within the project site as a result of the previous investigations. Additionally, as discussed in Section 3.5, based on the intensive-level archaeological pedestrian survey and research conducted as part of the Archaeological Resource Assessment (Appendix C-2), it was determined that the potential to encounter intact deposits containing archaeological resources within soils between the current grade and 18 inches below is unlikely. However, the potential for intact cultural deposits to exist within soils from 18 inches below current grade to the proposed depths of disturbance is unknown. Given the proximity of the proposed project site to the San Bernardino Mountains, an unnamed channel, and City Creek (a tributary of the Santa Ana River), there is a potential for cultural materials to exist that may be buried in alluvial and flood deposits beneath the layer of fill soils. Therefore, MM-CUL-1 through MM-CUL-4, as well as MM-TCR-1 and MM-TCR-2 shall be required. With incorporation of these mitigation measures, impacts would be less than significant.

As previously mentioned above and summarized in Table 28, the City notified California Native American Tribal representatives (that have requested notification) who are traditionally or culturally affiliated with the geographic area of the project pursuant to AB 52 on June 17, 2021. As a result of the notification letters, the City received responses from the SMBMI and the Kizh Nation. The SMBI stated that the project is within the Serrano ancestral territory, but did not have any concerns and provided mitigation language. The Kizh Nation provided screenshots of historical maps and

literary excerpts, including the explanatory text for each file. The files provided references to rancherias, trade routes and hydrographys or waterways around the project area as well as information regarding a Gabrieleno community. A review of the comments, maps, text, and letters/statements submitted by the Kizh Nation determined that the information does not constitute substantial evidence that the project could potentially cause a substantial adverse change in the significance of any tribal cultural resources. Therefore, the proposed project would not adversely affect known TCRs that are listed or eligible for listing in the state or local register. No mitigation is required.

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?***

Less-than-Significant Impact with Mitigation Incorporated. The project is subject to compliance with AB 52 (PRC 21074), which requires consideration of impacts to tribal cultural resources as part of the CEQA process and requires lead agencies to provide notification of proposed projects to California Native American Tribal representatives that have requested such notifications.

As discussed above, the SMBMI consulted with the City under AB 52, and stated that due to the nature and location of the project and the CRM Department's present knowledge, the SMBMI does not have any concerns with the project as planned at this time. Nonetheless, the SMBMI requested that mitigation measures be included for the project permit and planning.

The Kizh Nation also consutlted with the City under AB 52 and during the course of consultation, the Kizh Nation provided the City with screenshots of historical maps and literary excerpts, including the explanatory text for each file. The 1901 topographic map overlaid on Google Earth was provided by the Kizh Nation to show trade routes around the project area and includes a pin on a railroad. According the historical topographic map review section in Appendix C-2, the 1901-1951 and 1958 topographic maps show Highlands Motor Railroad as bisecting the project site; however, it is not depicted in the 1930 and 1938 aerials and is no longer extant. Moreover, the aerial photographs review within Appendix C-2, the proposed Project site has been subjected to consistent ground disturbance, shifting from open land to agricultural and/or residential use; however, Parcel 1 shifted to operating as a poultry farm between 1957 and the mid-1960s, before reverting to residential use and Parcel 5 has remained open and undeveloped. Furthermore, a review of a geotechnical report prepared for the project site determined that fills soils were encountered between 12 to 18 inches (1 to 1.5 feet) from the existing ground surface within all 15 exploratory backhoe trenching locations (see Appendix C-2). Based on the information provided, any potential to encounter intact subsurface cultural deposits associated with a trade route is unlikely. The 1938 map provided by the tribe (also discussed in Appendix C-2), was provided to show the location of a Gabrieleno community, trade routes, and hydrographys or waterways. Based on a review of this map, the nearest mapped Native American village is more than 2 miles southeast of the project site and is unnamed and the map does not show the place name of the Gabrieleno community referenced by the Kizh Nation. In addition, the project site is over 2.5 miles southeast of the confluence of 6 roads: Later Stage Road, Old Stage Road, Old Salt Road (Camino Para Sal), Spanish Town Road, and the road closest to the project site, is the northwest–southeast-

trending "Old Salt Road," which is approximately 1- mile to the southeast of the project site. Additionally the nearest waterway to the project site is approximately 1.3 miles north/northwest and is a tributary that links with the Santa Ana River to the southwest. Therefore, the 1901 and 1938 maps provided by the Kizh Nation do not provide substantial evidence that the project could potentially impact a tribal cultural resource.

The Kizh Nation also provided screenshots of a statement from the NAHC and a letter from the SCCIC regarding the potential to encounter subsurface archaeological resources regardless of the negative SLF and CHRIS records search results. As discussed in Sectin 3.5 Cultural Resources, no prehistoric resources or resources of Native American origin have been identified within the project site or the surrounding 0.5-mile search radius through the records search at the SCCIC (completed May 10, 2021). Although the NAHC SLF search results were positive, it is important to note that Sacred Land Files maintained by the NAHC represent a curation of "ancient places of special religious or social significance to Native Americans and known ancient graves and cemeteries of Native Americans on private and public lands in California" (nahc.gov 2021) provided by Tribal entities and Native American representatives. For various reasons, Tribal entities and Native American representatives do no not always report sacred lands or TCRs to the NAHC; as such, the NAHC's SLF is not necessarily a comprehensive list of known TCRs and searches of the SLF must be considered in concert with other research and not used as a sole source of information regarding the presence of TCRs. Additionally, results of the SLF provided relate to the general regional area within and surrounding the project site and don't necessarily equate to the existence of resources within the specific area occupied by the project site.

Based on the analysis above, the comments, maps, text, and letters/statements submitted by the Kizh Nation do not constitute substantial evidence that the project could potentially cause a substantial adverse change in the significance of any tribal cultural resources. As such, there are no resources in the project site, as presented during AB 52 consultation, that have been determined by the City to be significant pursuant to the criteria set forth in Public Resources Code Section 5020.1(k).

TCRs have not been identified through tribal consultation under AB 52, the City, acting as lead agency, has not identified any TCRs within the project site that would warrant discretionary designation of a resource as a TCR. However, the City, in an abundance of caution, has considered the information provided for review through consultation and determined to implement mitigation measures to ensure if unknown subsurface tribal cultural resources were inadvertently encounetered, they would be addressed properly. Therefore, in addition to the cultural reosiurces mitigation measures (MM-CUL-1, MM-CUL-2, and MM-CUL-3), tribal cultural resources mitigation measures have been included to provide for the retention of a Native American monitor by the applicant to monitor ground disturbing activities within naitve soils. As stipulated within mitigation prepared for Cultural Resources - appropriate handling of human remains will be completed in compliance with PRC 5097.98 and Health and Safety Code 7050.5. This includes establishing a process of respectful treatment through discussions with the identified MLD. Implementation of MM-TCR-1 would ensure that potential construction impacts related to an unknown tribal cultural resource would be reduced to a level less than significant.

MM-TRC-1: Retain a Native American Monitor Prior to Commencement of Ground Disturbing Activities

The project applicant shall make a good faith effort to retain a Native American monitor prior to the start of any project-related ground-disturbing activities. The Native American monitor shall be notified by the project applicant of the time and location of the Worker Environmental Awareness Program (WEAP) training no more than 72 hours prior to its scheduled occurrence.

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications 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 or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

a) ***Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?***

Less-than-Significant Impact. The proposed project involves the construction of a warehouse building, as well as paved parking areas and landscape areas. The project site currently consists of single-family

residences and vacant land. As such, the proposed project would increase demand for water supply compared to existing land uses.

As part of the project, utility service lines, including those for water, wastewater, stormwater drainage, electric power, natural gas, and telecommunications services, would be extended from their current locations in the public ROW surrounding the project site for operation of the proposed warehouse building. The proposed project would include the addition of a 2-foot domestic water line and a 6-foot sewer line connecting to existing utility lines within Victoria Avenue, as well as various underground pipes to convey stormwater to a 96-foot CMP Infiltration System. In addition, existing above-ground utility lines on the eastern project boundary would be re-routed underground, consistent with the City's Municipal Code Section 16.40.380.

Given that the activity of connecting utilities from their current locations within the public right-of-way would require ground disturbance and the use of heavy machinery associated with trenching, the connection of these utility services to the proposed warehouse building could potentially result in environmental effects. However, the extension of these utility lines is part of the proposed project analyzed herein. As such, any potential environmental impacts related to these components of the project are already accounted for in this IS/MND as part of the impact assessment conducted for the entirety of the project. No adverse physical effects beyond those already disclosed in this IS/MND would occur as a result of implementation of the project's utility system connections. Additionally, the project would constitute a nominal increase in utility usage, which has already been accounted for in growth projections for the City and by each utility provider. No modifications to utility infrastructure would be necessary outside of the immediate project area. As such, impacts associated with the construction or expansion of utility line connections would be less than significant.

b) ***Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?***

Less-than-Significant Impact. Domestic water would be provided to the project site by the EVWD. The EVWD provides domestic water for the City and for portions of both the City and County of San Bernardino. The primary water source for EVWD is groundwater from the Bunker Hill Basin. The Bunker Hill Basin has the capacity to provide 70,000 acre-foot per year of water from groundwater and surface water sources (City of San Bernardino 2005). The San Bernardino Valley Regional Urban Water Management Plan contains existing and projected water supplies for the region, including the EVWD. Table 29 shows projected water supplies during single- and multiple-dry year conditions, which represents "worst-case" conditions during extended periods of drought when supplies would be reduced.

Table 29. Projected Multiple Dry Year Supply and Demand Comparison (Acre-Feet)

Multiple Dry Year Scenario	2020	2025	2030	2035	2040
First Year					
Supply Totals	37,270	42,050	42,050	42,050	42,050
Demand Totals	25,060	27,006	29,000	29,616	29,900
Difference (supply minus demand)	12,210	15,044	13,050	12,434	12,150
Second Year					
Supply Totals	37,270	42,050	42,050	42,050	42,050
Demand Totals	25,060	27,006	29,000	29,616	29,900

Table 29. Projected Multiple Dry Year Supply and Demand Comparison (Acre-Feet)

Multiple Dry Year Scenario	2020	2025	2030	2035	2040
Difference (supply minus demand)	12,210	15,044	13,050	12,434	12,150
Third Year					
Supply Totals	37,270	42,050	42,050	42,050	42,050
Demand Totals	25,060	27,006	29,000	29,616	29,900
Difference (supply minus demand)	12,210	15,044	13,050	12,434	12,150

Source: SBVMWD, 2016.

Table 29 demonstrates that EVWD anticipates adequate supplies for years 2020 to 2040 under multiple dry year conditions based on current land use projections. However, in the unlikely event of a drought, natural disaster such as earthquake, a regional power outage, the San Bernardino Valley Municipal Water District has prepared a water shortage contingency plan for the region (SBVMWD 2016). This plan provides specific actions that should be taken to ensure critical water needs of the region are met during a period in which water supplies are cut by 50%. Based on the future and existing capacity, and water management measures, it is anticipated there are sufficient water supplies to serve the proposed project. Therefore, impacts associated with water supplies would be less than significant.

c) ***Would the project 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?***

Less-than-Significant Impact. Highland's sewer system is maintained by the EVWD, which has joint powers with the City of San Bernardino to accept all sewage generated within the EVWD's boundaries. The project would coordinate with the EVWD to meet sewer requirements established by the DHS to ensure the continued sewer services in Highland, which has the potential to be impacted with continued growth within the City. However, water recycling programs, such as the project's CMP Infiltration System, assist in reducing the amount of wastewater conveyed to the sewage system. The sewage from Highland is treated at the San Bernardino WRP, operated by the San Bernardino City Municipal Water District (City of Highland 2006). The WRP treats residential and industrial wastewater generated in the City of San Bernardino, the City of Loma Linda, and EVWD (City of San Bernardino 2005). The WRP processes an average sewage flow of approximately 26 to 27 mgd and has a total sewage capacity of 33 mgd (City of Highland 2006). Table 30, Current and Projected Wastewater Collection and Treatment, shows existing and anticipated wastewater collection and treatment at the WRP..

Table 30. Current and Projected Wastewater Collection and Treatment

Facility	2010	2015	2020	2025	2030	2035	Disposal Method	Treatment Level
San Bernardino WRP (AFY)	29,000	30,294	31,645	32,793	33,983	35,216	Flow to RIX	Secondary
RIX Facility (AFY)	33,000	34,472	36,010	37,316	38,670	40,073	Discharge to Santa Ana River	Tertiary

Source: SBMWD 2015
Notes: WRP = Wastewater Reclamation Plant; AFY = acre-feet per year; RIX = Rapid Infiltration Extraction

SBMWD forecasts adequate capacity to treat wastewater in the upcoming years. As noted above in Section 3.19(a), the proposed project is consistent with the existing zoning designation established by the City. As such, anticipated wastewater generation for an industrial use has already been accounted for in growth projections for the City. Existing infrastructure is adequate to convey wastewater without requiring the expansion of the facilities. In addition, the project applicant would pay applicable connection fees and monthly charges which offset the need for incremental wastewater conveyance and treatment. Therefore, impacts associated with wastewater capacities would be less than significant.

EVWD is currently constructed a new wastewater treatment plan, Sterling Natural Resources Plan, at the intersection of Del Rosa Avenue and 5th Street. Once online, this new facility will provide improved and expanded service to all sewer clients in Highland

d) ***Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?***

Less-than-Significant Impact. Solid waste generated in the City is collected and transported by the City's contract waste hauler, Burrtec Waste Industries (Burrtec) (City of Highland 2018). Solid waste from demolition and construction would be collected and sent to the East Valley Transfer and Recycling Materials Recovery Facility, located at 1150 and 1250 S. Tippecanoe Ave, San Bernardino, California 92408, where it is separated from recyclable materials. Solid waste is then shipped to the Mid-Valley Sanitary Landfill at 2390 N. Adler Avenue in the City of Rialto. The California Department of Resources Recycling and Recovery (CalRecycle) publishes solid waste generation rates based on land use types. According to CalRecycle, manufacturing/warehouse uses generate 1.42 pounds per 100 square feet per day (CalRecycle n.d.). Based on these generation rates, construction of the proposed 305,617-square-foot warehouse building could generate solid waste at a rate of approximately 2.17 tons of solid waste per day.[28]

The Mid-Valley Sanitary Landfill currently has a daily permitted throughput of 7,500 tons a day and a remaining capacity of 61,219,377 CY (CalRecycle 2019). As a result, solid waste generated by the proposed project would represent a nominal percentage of the collective maximum daily throughput permitted for this landfill. Therefore, impacts associated with permitted landfill capacity would be less than significant.

e) ***Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?***

Less-than-Significant Impact. All collection, transportation, and disposal of solid waste generated by the project would comply with all applicable federal, state, and local statutes and regulations. The City of Highland contracts Burrtec for the residential and commercial refuse collection program, which is designed to efficiently collect trash, recyclables, and green waste, and to assist the City in meeting mandated diversion goals established by the State of California. Solid waste is disposed of at the Colton, Mid-Valley, and San Timoteo landfills (City of Highland 2006).

Waste from construction activities, including demolition and construction, would comply with the City's requirement to submit and obtain an approved construction waste diversion plan to help divert construction and demolition waste from landfills, as outlined in Section 8.12.285 of the City's Municipal Code, and also to comply with mandates of CalRecycle. The City diversion requirement, as outlined in Section 16.40.400

[28] This estimate does not account for diversion of recyclables from the solid waste stream and, thus, should be considered a conservative projection.

of the City's Municipal Code, is 50%, which means that projects that involve construction and demolition (such as the proposed project), are required to divert 50% of the construction and demolition waste tonnage at a project site from landfills.

Burrtec operated five material recovery facilities in Southern California, which sort and process recyclables; the remaining waste is then taken to the nearby Mid-Valley Sanitary Landfill (Burrtec n.d.). As of the most recent capacity inspection completed in 2019, the remaining capacity at Mid-Valley Sanitary Landfill currently has a maximum permitted throughput of 7,500 tons per day and a remaining capacity of 61,219,377 CY (CalRecycle 2019).

As required by existing regulations, any hazardous materials collected on the project site during demolition, construction, or operational activities would be transported and disposed of by a permitted and licensed hazardous materials service provider at a facility permitted to accept such hazardous materials. Therefore, impacts associated with permitted landfill capacity and solid waste statutes and regulations would be less than significant.

3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
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) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The project is not located within a Fire Hazard Severity Zone or a Very High Hazard Severity Zone according to the Local Responsibility and State Responsibility Area maps by CAL FIRE (CAL FIRE 2007, 2008). In addition, the project site is currently comprised of vacant and developed land and is located in a developed portion of the City. The City's General Plan outlines major evacuation routes within the San Bernardino Valley as I-10, 15, and 215, and State Highway 30, 31, 60, 66, and 71 (City of Highland 2006). In the case of an emergency, 6th Street and Victoria Avenue may be used as evacuation routes, but these roads are not explicitly outlined as evacuation routes by the City. As discussed in Section 3.9, the project would not significantly affect emergency response or evaluation activities. Therefore, no impacts associated with an emergency response or evacuation plan would occur.

b) Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. The project site is not located within a Fire Hazard Severity Zone or a Very High Fire Hazard Severity Zone according to the Local Responsibility and State Responsibility Area maps by CAL FIRE (CAL FIRE 2007, 2008). In addition, the project site is currently partially developed and located within a developed portion of the City. Further, the project site is relatively flat and contains only limited amounts of ornamental vegetation associated with existing landscaping and does not contain extensive amounts of vegetation or wildfire fuel. Therefore, it is not anticipated that the project, due to slope, prevailing winds, and other factors, would exacerbate wildfire risks or expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Thus, the project would not expose people or structures to significant risk involving wildfires, exacerbate wildfire risks, or otherwise result in wildfire-related impacts. Therefore, no impacts associated with wildfire would occur.

c) Would the project 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?

No Impact. The project site is not located within a Fire Hazard Severity Zone or a Very High Fire Hazard Severity Zone according to the Local Responsibility and State Responsibility Area maps by CAL FIRE (CAL FIRE 2007, 2008). In addition, the project site is currently developed and located within a developed portion of the City that is not prone to wind hazard (City of San Bernardino 2005). The project would construct surface parking lots, new internal circulation roadways, and infrastructure for the proposed development. It is not anticipated that installation or maintenance of internal driveways would exacerbate fire risk, as the driveways would be surrounded by developed land. Further, the project site is in a predominately developed area and would connect to existing utilities. The project would not require installation or maintenance of other associated infrastructure such as fuel breaks, power lines, or other utilities that would exacerbate fire risk. As such, the project would not expose people or structures to significant risk involving wildland fires, exacerbate wildfire risks, or otherwise result in wildfire-related impacts. Therefore, no impacts associated with wildfire would occur.

d) ***Would the project 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?***

No Impact. The project site is not located within a Fire Hazard Severity Zone or a Very High Fire Hazard Severity Zone according to the Local Responsibility and State Responsibility Area maps by CAL FIRE (CAL FIRE 2007, 2008). As discussed in Section 3.7, Geology and Soils, and Section 3.10, Hydrology and Water Quality, the project would not result in significant risks associated with flooding, landslides, runoff, or drainage changes, and the project does not propose the use of fire (such as for a controlled vegetation burn) that would result in post-fire instability. Further, the project site is located within a developed portion of the City that is not susceptible to wildland fires, given its considerable distance from open, natural areas. Thus, the project would not expose people or structures to significant risk involving wildland fires, exacerbate wildfire risks, or otherwise result in wildfire-related impacts. Therefore, no impacts with wildfire would occur.

3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
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? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

a) ***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?***

Less Than Significant With Mitigation Incorporated. As described throughout this IS/MND, with the incorporation of the identified mitigation measures, the project would not degrade the quality of the environment; would not substantially reduce the habitats of fish or wildlife species; would not cause a fish or wildlife population to drop below self-sustaining levels; would not threaten to eliminate a plant or animal; and would not eliminate important examples of major periods of California history or prehistory. Therefore, impacts would be less than significant with mitigation incorporated.

b) ***Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?***

Less Than Significant With Mitigation Incorporated. When evaluating cumulative impacts, it is important to remain consistent with Section 15064(h) of the CEQA Guidelines, which states that an EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

Alternatively, a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable through mitigation measures set forth in an MND or if the project will comply with the requirements in a previously approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located.

The proposed project would potentially result in project related air quality, biological, cultural and tribal cultural, and geological impacts that could be potentially significant without the incorporation of mitigation. Thus, when coupled with air quality, biological, cultural and tribal cultural, and geological impacts related to the implementation of other related projects throughout the broader project area, the project would potentially result in cumulative-level impacts if these significant impacts are left unmitigated.

However, with the incorporation of mitigation identified herein, the project's impacts to air quality, biological resources, cultural and tribal cultural resources, and geological resources would be reduced to less-than-significant levels and would not considerably contribute to cumulative impacts in the greater project region. In addition, these other related projects would presumably be bound by their applicable lead agency to (1) comply with all applicable federal, state, and local regulatory requirements; and (2) incorporate all feasible mitigation measures, consistent with CEQA, to further ensure that their potentially cumulative impacts would be reduced to less-than-significant levels.

Although cumulative impacts are always possible, the project, by incorporating all mitigation measures outlined herein, would reduce its contribution to any such cumulative impacts to less than cumulatively

considerable; therefore, the project would result in individually limited, but not cumulatively considerable, less-than-significant impacts with mitigation incorporated.

c) ***Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?***

Less Than Significant With Mitigation Incorporated. As evaluated throughout this IS/MND, with incorporation of mitigation identified herein, all environmental impacts associated with the project would be reduced to less-than-significant levels. Thus, the project would not directly or indirectly cause substantial adverse effects on human beings. Impacts would be less than significant with mitigation incorporated.

4 References and Preparers

4.1 References Cited

14 CCR 15000–15387 and Appendices A through L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

Baltrėnas, P., D. Kazlauskas, and E. Petraitis. 2004. "Testing on Noise Level Prevailing at Motor Vehicle Parking Lots and Numeral Simulation of its Dispersion." *Journal of Environmental Engineering and Landscape Management* 12(2): 63-70.

Bean, Lowell, J., and Florence C. Shipek. 1978. "Luiseño," in *California*, Robert F. Heizier (ed.), pp. 550-563, Handbook of North American Indians, Vol. 8, W.C. Sturtevant (general editor), Smithsonian Institution, Washington, D.C.

Bean, L.J., and C.R. Smith. 1978a. "Serrano," in *California*, edited by Robert F. Heizer, 570–574. Vol. 8 in Handbook of North American Indians, edited by William C. Sturtevant. Washington, D.C.: Smithsonian Institution.

Bean, Lowell J., and Charles R. Smith. 1978b. "Gabrielino," in *California*, edited by Robert F. Heizer, pp. 538–549. Handbook of North American Indians, Vol. 8, William G. Sturtevant, general editor, Smithsonian Institution, Washington, D.C.

Benedict, R.F. 1924. "A Brief Sketch of Serrano Culture." American Anthropologist 26(3): 366–392.

Boscana, G. 1846. "Chinigchinich; A Historical Account of the Origin, Customs, and Traditions of the Indians at the Missionary Establishment of St. Juan Capistrano, Alta California." In Life in California, by Alfred Robinson, 227–341. New York, New York: Wiley & Putnam.

Burrtec (Burrtec Waste Industries). n.d. "Material Recovery Facilities". Accessed June 2021. https://www.burrtec.com/material-recovery-facilities/.

Caltrans (California Department of Transportation). 2013. *Technical Noise Supplement to the Caltrans Traffic Noise Analysis Protocol*. Division of Environmental Analysis, Environmental Engineering, Hazardous Waste, Air, Noise, Paleontology Office. Sacramento, California. September 2013.

Caltrans. 2018. California State Scenic Highway System Map. Accessed May 2021. https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=2e921695c43643b1aaf7000dfcc19983

California Public Resources Code, Section 21000–21177. California Environmental Quality Act, as amended.

CalEPA (California Environmental Protection Agency). 2021. "Cortese List: Section 65962.5(a)". Accessed May 2021. https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/.

CAL FIRE (California Department of Forestry and Fire Protection). 2007. "Fire Hazard Severity Zones in SRA" [map of SW San Bernardino County]. Scale 1:100,000. November 7, 2007. Accessed May 2021. https://osfm.fire.ca.gov/media/6781/fhszs_map62.pdf.

CAL FIRE. 2008. "Very High Fire Hazard Severity Zones in LRA" [map of Highland]. Scale 1:24,000. October 29, 2008. Accessed May 2021. https://osfm.fire.ca.gov/media/5946/highland.pdf.

CalRecycle (California Department of Resources Recycling and Recovery). 2019. "SWIS Facility/Site Activity Details, Mid-Valley Sanitary Landfill (36-AA-0055)". Accessed May 2021. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1880?siteID=2662.

CalRecycle. n.d. "Estimated Solid Waste Generation Rates". Accessed May 2021. https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates

CAPCOA (California Air Pollution Control Officers Association). 2008. *CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*. January 2008. Accessed https://www.contracosta.ca.gov/DocumentCenter/View/34122/CAPCOA-2008-CEQA-and-Climate-Change-PDF.

CAPCOA. 2017. "California Emissions Estimator Model (CalEEMod) User's Guide Version 2016.3.2". Prepared by Trinity Consultants and the California Air Districts. November 2017. Accessed http://www.caleemod.com/.

CAPCOA. 2021." California Emissions Estimator Model (CalEEMod) User's Guide Version 2020.4.0". Prepared by Trinity Consultants and the California Air Districts. May 2021. http://www.caleemod.com/.

CARB (California Air Resources Board). 2005. "Air Quality and Land Use Handbook". April 2005. Accessed August 2016. http://www.arb.ca.gov/ch/landuse.htm.

CARB. 2014. *First Update to the Climate Change Scoping Plan Building on the Framework Pursuant to AB 32 – The California Global Warming Solutions Act of 2006*. May 2014. http://www.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf.

CARB. 2017a. *California's 2017 Climate Change Scoping Plan*. November 2017. Accessed December 2019. https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

CARB. 2017b. *The 2017 Climate Change Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target*. January 20, 2017. Accessed February 27, 2021. https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf.

CARB. 2019. "Maps of State and Federal Area Designations." Last reviewed October 24, 2019. Accessed http://www.arb.ca.gov/desig/adm/adm.htm.

CARB. 2020. Advanced Clean Trucks [fact sheet]. Last updated: June 25, 2020. Accessed https://ww2.arb.ca.gov/sites/default/files/2020-06/200625factsheet_ADA.pdf.

CARB. 2021. EMFAC 2021 Web Database (v1.0.0). Accessed June 2021. https://arb.ca.gov/emfac/emissions-inventory.

CDOC (California Department of Conservation). 2016. California Important Farmland Finder. https://maps.conservation.ca.gov/DLRP/CIFF/.

CDOC. 2021. California Geologic Service Seismic Hazards Program: Alquist-Priolo Fault Hazard Zones.

City of Highland. 2006. *General Plan*. March 2006. Accessed May 2021. https://www.cityofhighland.org/191/General-Plan.

City of Highland. 2012. "Zoning" [map]. May 4, 2012. Accessed May 2021. https://www.cityofhighland.org/DocumentCenter/View/191/Zoning-Map-PDF?bidId=.

City of Highland. 2018. "Trash Services". September 2018. Accessed May 2021. https://www.cityofhighland.org/197/Trash-Services.

City of Highland. 2021. Municipal Code. January 2021.

City of Inglewood. 2019. *Inglewood Basketball and Entertainment Center Project.* Accessed June 25, 2021. https://files.ceqanet.opr.ca.gov/60191-3/attachment/a-wQrPYfgqX6rH7PlozmRPEvEaRCdDy9wtEOIK6Lkzx9y2kM5Y76yA2pvL0h1Nhm4o1xu79V9PavU-kk0.

City of San Bernardino. 2005. *General Plan*. November 1, 2005. Accessed May 2021. http://sbcity.org/civicax/filebank/blobdload.aspx?blobid=26199.

City of San Jose. 2020. *Integrated Final Environmental Impact Report, Amendment to Normoan Y. Mineta San Jose International Airport Master Plan.* Accessed June 25, 2021. https://www.sanjoseca.gov/home/showpublisheddocument/61640/637304476542130000.

CNPS. 2021. Inventory of Rare and Endangered Plants (online edition, v8-03 0.45). Sacramento, California: California Native Plant Society. Accessed May 2021. www.rareplants.cnps.org.

CNRA (California Natural Resources Agency). 2009. *Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB 97.* December 2009. Accessed June 25, 2021. https://files.resources.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf.

CSU Dominguez Hills (California State University Dominguez Hills). 2019. *California State University Dominguez Hills Campus Master Plan EIR*. https://www.csudh.edu/Assets/csudh-sites/fpcm/docs/campus-master-plan/csudh-cmp-deir-feb-2019.pdf.

Cultural Systems Research. 2005. *Inland Feeder Project: Final Report, Native American Ethnography and Ethnohistory.* Prepared for Metropolitan Water District of Southern California, Los Angeles. Cultural Systems Research, Inc., Menlo Park. On File at the EIC.

DeBarros, Phil. 2004. Cultural Resources Overview and Management Plan Rancho Las Flores Project, Hesperia, San Bernardino County, California. On File at the SCCIC.

DOF (State of California, Department of Finance). 2021. "E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2021 with Census Benchmark". Sacramento, California. May 2021. Accessed . https://dof.ca.gov/Forecasting/Demographics/Estimates/E-5/

DTSC (Department of Toxic Substances Control). 2021. EnviroStor. https://envirostor.dtsc.ca.gov/public/.

EDD (California Employment Development Department). 2021. Riverside-San Bernardino-Ontario Metropolitan Statistical Area (MSA) (Riverside and San Bernardino Counties). May 2021. Accessed June 2021. https://data.edd.ca.gov/w/7qx7-ercp/98fh-2xv7?cur=F5L7ERsZG9m&from=uwHlA4c1orF

EPA (U.S. Environmental Protection Agency). 2008. *Final Ozone NAAQS Regulatory Impact Analysis*. Research Triangle Park, North Carolina. March 2008. Accessed June 25, 2021. https://www3.epa.gov /ttnecas1/regdata/RIAs/452_R_08_003.pdf.

EPA. 2015. *Transportation Conformity Guidance for Quantitative Hot-spot Analyses in $PM_{2.5}$ and PM_{10} Nonattainment and Maintenance Areas - Appendices*. Transportation and Climate Division, Office of Transportation and Air Quality. November 2015. Accessed October 21, 2020. https://nepis.epa.gov/Exe /ZyPdf.cgi?Dockey=P100NN22.pdf.

EPA. 2017. "Support Center for Regulatory Atmospheric Modeling (SCRAM): Photochemical Air Quality Modeling". Accessed June 25, 2021. https://www.epa.gov/scram/photochemical-air-quality-modeling.

EPA. 2018a. *AERMOD Implementation Guide*. Research Triangle Park, North Carolina. April 2018. Accessed June 25, 2021. https://gaftp.epa.gov/Air/aqmg/SCRAM/models/preferred/aermod /aermod_implementation_guide.pdf.

EPA 2018b. *Environmental Benefits Mapping and Analysis Program – Community Edition, User's Manual*. July 2018. Last updated April 2021. Accessed June 25, 2021. https://www.epa.gov/sites/production/files/2015-04/documents/benmap-ce_user_manual_march_2015.pdf.

EPA. 2020. "Outdoor Air Quality Data: Monitor Values Report". Last updated May 28, 2020. Accessed June 25, 2021. https://www.epa.gov/outdoor-air-quality-data/monitor-values-report.

EPA. 2021. "Household Hazardous Waste (HHW)." Last updated March 22, 2021. Accessed May 2021. https://www.epa.gov/hw/household-hazardous-waste-hhw.

FEMA (Federal Emergency Management Agency). 2016. FEMA Flood Map Service Center. Accessed June 2021. https://msc.fema.gov/portal/search?AddressQuery=7824%20Victoria%20Avenue%2C%20Highland%2C%20CA#searchresultsanchor.

FHWA (Federal Highway Administration). 2008. *Roadway Construction Noise Model (RCNM), Software Version 1.1*. U.S. Department of Transportation, Research and Innovative Technology Administration, John A. Volpe National Transportation Systems Center, Environmental Measurement and Modeling Division. Washington, D.C. December 8, 2008.

FICON (Federal Interagency Committee on Noise). 1992. *Federal Agency Review of Selected Airport Noise Analysis Issues*. Prepared by the Federal Interagency Committee on Noise. August 1992. https://fican1.files.wordpress.com/2015/10/reports_noise_analysis.pdf.

FTA (Federal Transit Administration). 2018. *Transit Noise and Vibration Impact Assessment Manual.* FTA Report No. 0123. Prepared by John A. Volpe National Transportation Systems Center. September 2018. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.

Golla, V. 2007. "Linguistic Prehistory." In California Prehistory: Colonization, Culture, and Complexity, edited by T.L. Jones and K.A. Klar, 71–82. New York, New York: Altamira Press.

Harrington, J.P. 1934. "A New Original Version of Boscana's Historical Account of the San Juan Capistrano Indians of Southern California." Smithsonian Miscellaneous Collections 92(4).

Heizer, R. 1978. "Introduction." In California, edited by R.F. Heizer, 1–6. Handbook of North American Indians, Vol. 8, edited by W.C. Sturtevant. Washington, D.C.: Smithsonian Institution.

Heizer, R. and K.M. Nissen. 1973. The Human Sources of California Ethnography. Berkeley, California: University of California Archaeological Research Facility, Berkeley.

IPCC (Intergovernmental Panel on Climate Change). 2007. *Climate Change 2007: Synthesis Report.* Contribution of Working Groups I, II and III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. New York, New York: Cambridge University Press. Accessed October 2016. https://www.ipcc.ch/report/ar4/syr/.

ITE (Institute of Transportation Engineers). 2017. Trip Generation Handbook, 10th Edition.

Johnson Controls. 2015. *York Technical Guide.* R-410A ZE/ZF/ZR/XN/XP SERIES, 3 - 6 TON 60 Hertz. 251933-YTG-Y-0715.

Johnson, J.R., and J.G. Lorenz. 2006. "Genetics, Linguistics, and Prehistoric Migrations: An Analysis of California Indian Mitochondrial DNA Lineages." Journal of California and Great Basin Anthropology 26:33–64.

King, Chester D. 1994. *Native American Placenames in the Santa Monica Mountains National Recreation Area, Agoura Hills.* Topanga Anthropological Consultants, California.

Kroeber, Alfred J. 1925. *Handbook of the Indians of California.* Bureau of American Ethnology Bulletin 78. Dover Publications, Inc., New York.

Laylander, D. 2000. Early Ethnography of the Californias, 1533-1825. Salinas, California: Coyote Press Archives of California Prehistory.

Lightfoot, K.G. 2005. *Indians, missionaries, and merchants: the legacy of colonial encounters on the California frontiers.* Berkeley, California: University of California Press.

March JPA (March Joint Powers Association). 2019. *K4 Warehouse and Cactus Channel Improvements Project.* Accessed June 25, 2021. https://files.ceqanet.opr.ca.gov/125156-2/attachment/Ehqb2eUJlmRQO IgiGAAWSHmDkaoZPmyRK24Uy0s3tId8G3lOWxuuhU_a7PpSB6ecz1qP5JgNptOuCa120.

McCawley, William 1996. The First Angelinos, the Gabrielino Indians of Los Angeles. Malki Museum Press, Banning.

nahc.gov (Native American Heritage Commission). *About the Native American Heritage Commission.* State of California Native American Heritage Commission, 2021, http://nahc.ca.gov/about/. Accessed April 22, 2021

NRC (National Research Council). 2005. *Interim Report of the Committee on Changes in New Source Review Programs for Stationary Sources of Air Pollutants*. Washington, DC: The National Academies Press. Accessed June 25, 2021. https://doi.org/10.17226/11208.

OEHHA (Office of Environmental Health Hazard Assessment). 2015. Air Toxics Hot Spots Program. *Risk Assessment Guidelines. Guidance Manual for Preparation of Health Risk Assessments.* February 2015. Last updated March 6, 2015. Accessed June 25, 2021. http://oehha.ca.gov/air/hot_spots/2015/2015GuidanceManual.pdf.

O'Neil, Stephen. 2002. The Acjachemen in the Franciscan Mission System: Demographic Collapse and Social Change. Masters thesis, Department of Anthropology, California State University, Fullerton.

OSHA (Occupational Safety and Health Administration). n.d. "Hazard Communication Standard: Safety Data Sheets." Accessed May 2021. https://www.osha.gov/sites/default/files/publications/OSHA3514.pdf.

RWQCB (Regional Water Quality Control Board Santa Ana Region). 2010. National Pollutant Discharge Elimination System Permit and Waste Discharge Requirements for the San Bernardino County Flood Control District, the County of San Bernardino, and the Incorporated Cities of San Bernardino County within the Santa Ana Region. January 29, 2010.

San Bernardino International Airport Authority. 2010. *Airport Layout Plan Narrative Report for San Bernardino International Airport*. Prepared by Coffman Associates, Inc. for San Bernardino International Airport Authority. November 2010. Accessed May 2021. http://www.sbiaa.org/wp-content/uploads/2015/10/ALP-Narrative-Report-Complete.pdf.

SBCAPCD (Santa Barbara County Air Pollution Control District). 2020. *Modeling Guidelines for Air Quality Impact Assessments*. Prepared by Robin Cobbs and Charlotte Mountain for the Santa Barbara County Air Pollution Control District. June 2020. Accessed March 2021. https://www.ourair.org/wp-content/uploads/aqia.pdf.

SBCOG (San Bernardino Council of Governments). 2021. *San Bernardino County Regional Greenhouse Gas Reduction Plan*. Final Draft. Prepared by ICF International and LSA. San Bernardino, California. March 2021. Accessed June 25, 2021. https://www.gosbcta.com/wp-content/uploads/2019/09/San_Bernardino_Regional_GHG_Reduction_Plan_Main_Text_Mar_2021.pdf.

SBVMWD (San Bernardino Valley Municipal Water District). 2016. *2015 San Bernardino Valley Regional Urban Water Management Plan*. Prepared by Water Systems Consulting, Inc. June 2016. Amended June 2017. Accessed May 2021. https://wuedata.water.ca.gov/public/uwmp_attachments/4817304313/SBV_RUWMP_rev_with_appendices.pdf.

SCAG (Southern California Association of Governments). 2001. *Employment Density Study Summary Report*. Prepared by The Natelson Company, Inc. Yorba Linda, California. October 31, 2001. Accessed June 25, 2021. http://www.mwcog.org/file.aspx?A=QTTITR24POOOUlw5mPNzK8F4d8djdJe4LF9Exj6lXOU%3D.

SCAG. 2016. *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability and a High Quality of Life*. Adopted April 7, 2016. Accessed May 2021. https://scag.ca.gov/sites/main/files/file-attachments/f2016rtpscs.pdf?1606005557.

SCAG. 2020. *Connect SoCal: The 2040-2045 Regional Transportation Plan/ Sustainable Communities Strategy of the Southern California Association of Governments*. May 7, 2020. Accessed July 2020. https://www.connectsocal.org/Documents/Adopted/fConnectSoCal-Plan.pdf.

SCAQMD (South Coast Air Quality Management District). 1993. "CEQA Air Quality Handbook (1993)". Accessed June 25, 2021. http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993).

SCAQMD. 2003a. *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*. August 2003. Accessed June 25, 2021. http://www.aqmd.gov/docs/default-source/Agendas /Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf?sfvrsn=2.

SCAQMD. 2003b. *Final 2003 AQMP Appendix V Modeling and Attainment Demonstrations*. August 2003. Accessed June 25, 2021. https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2003-air-quality-management-plan/2003-aqmp-appendix-v.pdf?sfvrsn=2.

SCAQMD. 2003c. "Mobile Source Toxics Analysis". August 2003. Accessed October 2018. http://www.aqmd.gov /home/rules-compliance/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis.

SCAQMD. 2008a. *Final Localized Significance Threshold Methodology*. Revised July 2008. Accessed June 25, 2021. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf.

SCAQMD. 2008b. *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold*. October 2008. Accessed October 2020. http://www.aqmd.gov/docs/default-source/ ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf.

SCAQMD 2010. "Greenhouse Gas CEQA Significance Threshold Stakeholder Working Group Meeting #15." September 28, 2010. Accessed June 25, 2021. http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-main-presentation.pdf?sfvrsn=2.

SCAQMD. 2014. *SCAQMD High Cube Warehouse Truck Trip Study White Paper Summary of Business Survey Results*. June 2014. Accessed September 2020. http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/business-survey-summary.pdf.

SCAQMD. 2015. Brief of Amicus Curiae in Support of Neither Party, *Sierra Club v. County of Fresno*, Case No. S219783 (filed Apr. 13, 2015). Accessed June 25, 2021. https://www.courts.ca.gov/documents/ 9-s219783-ac-south-coast-air-quality-mgt-dist-041315.pdf.

SCAQMD. 2016. Rule 1113 Architectural Coatings. Amended February 5, 2016. Accessed October 2020. https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf?sfvrsn=24.

SCAQMD. 2017. *Final 2016 Air Quality Management Plan*. March 2017. Accessed December 2019. http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15.

SCAQMD. 2018. "SCAQMD Modeling Guidance for AERMOD." Accessed April 2018. http://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance.

SCAQMD. 2019. "South Coast AQMD Air Quality Significance Thresholds." Originally published in CEQA Air Quality Handbook, Table A9-11-A. Revised April 2019. Accessed June 25, 2021. http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2.

SCAQMD. 2021a. "SCAQMD Modeling Guidance for AERMOD." Accessed March 2021. https://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance.

SCAQMD. 2021b. "Meteorological Data for Dispersion Modeling." Accessed March 2021. http://www.aqmd.gov/home/air-quality/meteorological-data.

SCE (Southern California Edison). 2021. Edison International 2020 Sustainability Report. Accessed June 25, 2021. https://www.edison.com/content/dam/eix/documents/sustainability/eix-2020-sustainability-report-scorecard.pdf.

SDSU (San Diego State University). 2019. *Draft, San Diego State University Mission Valley Campus Master Plan Environmental Impact Report.* Accessed June 25, 2021. https://missionvalley.sdsu.edu/pdfs/eir/0000-draft-eir-combined.pdf.

SJVAPCD (San Joaquin Valley Air Pollution Control District). 2006. *Guidance for Air Dispersion Modeling.* Draft. Accessed July 2018. http://www.valleyair.org/busind/pto/tox_resources/Modeling%20Guidance.pdf.

SJVAPCD. 2015. Brief of Amicus Curiae in Support of Defendant And Respondent, County Of Fresno, And Real Party In Interest And Respondent, Friant Ranch, L.P., Sierra Club v. County of Fresno, Case No. S219783 (filed Apr. 13, 2015). Accessed June 25, 2021. https://www.courts.ca.gov/documents/7-s219783-ac-san-joaquin-valley-unified-air-pollution-control-dist-041315.pdf.

Sparkman, Philip. 1908. The Cultural of the Luiseño Indians. *University of California Publications in American Archaeology and Ethnology* 8:187–234. Berkeley.

SWRCB (State Water Resources Control Board). 2021a. "Construction Stormwater Program". Updated January 11, 2021. Accessed May 2021. https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.html.

SWRCB. 2021b. GeoTracker. https://geotracker.waterboards.ca.gov/.

The Climate Registry. 2020. "2020 Default Emission Factors." April 2020. Accessed June 25, 2021. https://www.theclimateregistry.org/wp-content/uploads/2020/04/The-Climate-Registry-2020-Default-Emission-Factor-Document.pdf.

USDA (U.S Department of Agriculture) 2021. Natural Resource Conservation Service (NRCS) Web Soil Survey. Accessed January 2021. https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx.

USFWS (U.S. Fish and Wildlife Service). 2020a. Information for Planning and Consultation (iPaC). https://ecos.fws.gov/ipac/ Last accessed December 2020.

USFWS. 2020b. National Wetlands Inventory website. Washington, D.C.: U.S. Department of the Interior, Fish and Wildlife Service. Last accessed January 2021. http://www.fws.gov/wetlands/

White, Raymond. 1963. Luiseño Social Organization. University of California Publications in American Archaeology and Ethnology 48:91-194. Berkeley.

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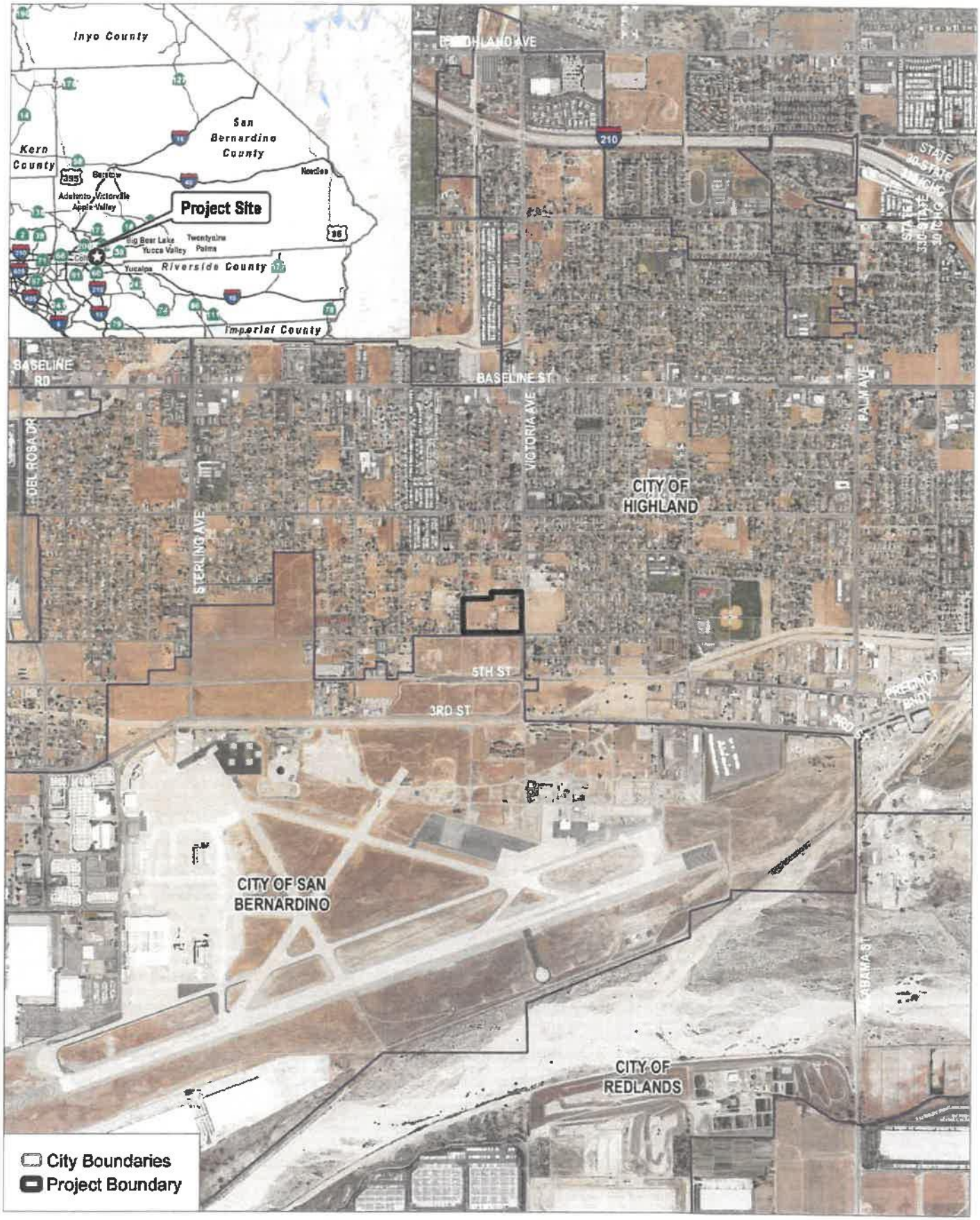

SOURCE: Bing Maps, USGS Topo Map Series

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FIGURE 1

Project Location Map

6th Street and Victoria Avenue Warehouse Project

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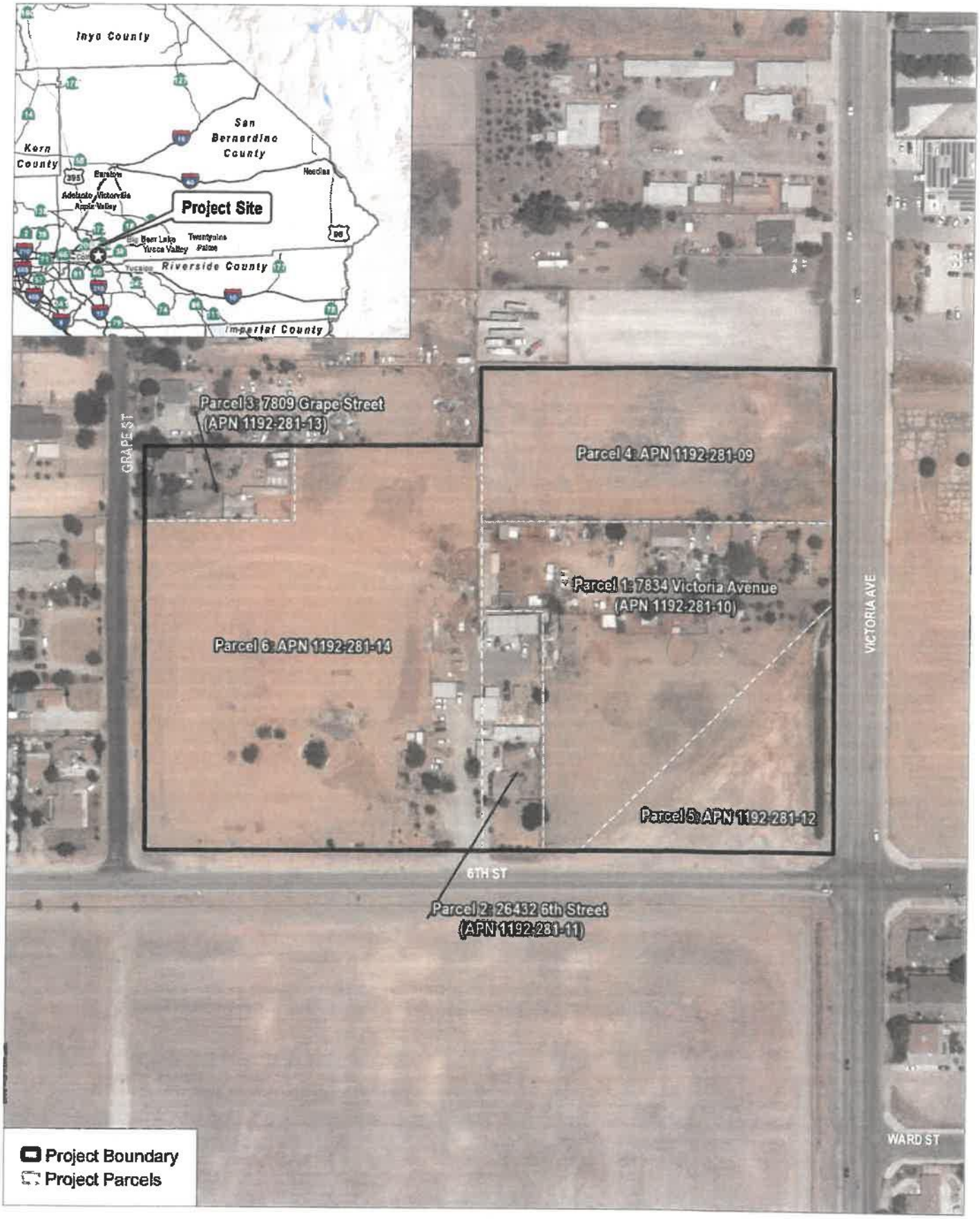

SOURCE: Bing Maps

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FIGURE 2

Aerial Overview

6th Street and Victoria Avenue Warehouse Project

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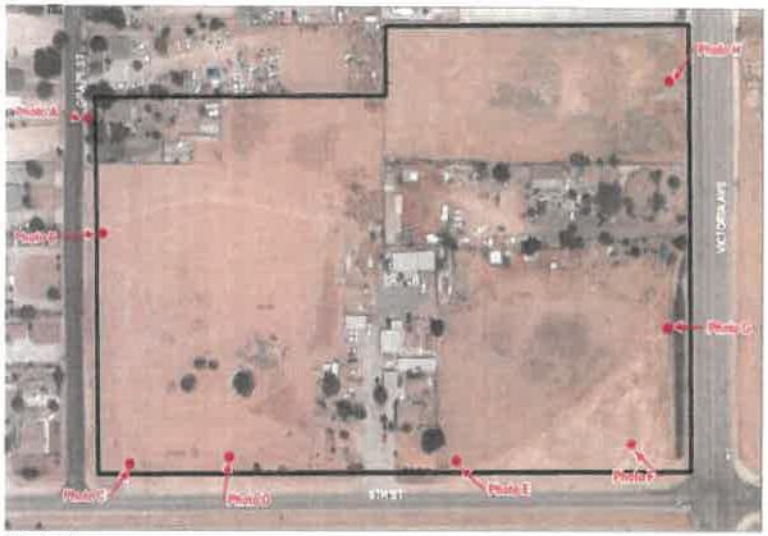

Photo Key



Photo A: Photo taken from Grape Street facing east towards the single family residence at 7809 Grape Street (APN 1192-281-13). This property contains four buildings including one single-family residence, one storage building, and two horse barns.



Photo B: Photo taken from Grape Street facing east. A dirt road provides the residential property in the central portion of the site with access to Grape Street. Horse fencing is visible in the right portion of the photo.



Photo C: Photo taken from the intersection of Grape Street and 6th Street facing northeast towards land that is used for horseback riding and grazing.

SOURCE: Dudek 2021

DUDEK

FIGURE 3A-A

Existing Conditions

6th Street and Victoria Avenue Warehouse Project

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Photo Key



Photo D: Photo taken from 6th Street facing northeast towards land that is used for horseback riding and grazing.



Photo E: Photo taken from 6th Street facing northwest towards 26432 6th Street (APN 1192-281-11). An area used for horse grazing is in the foreground.



Photo F: Photo taken from the intersection of 6th street and Victoria Avenue facing northwest. The foreground contains land that is used for stockpiling soils. A horse corral, barns, sheds, and residences are visible in the background.

SOURCE: Dudek 2021

DUDEK

FIGURE 3A-B

Existing Conditions

6th Street and Victoria Avenue Warehouse Project

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Photo Key



Photo G: Photo taken from Victoria Avenue facing west towards the center of the project site. A horse corral is visible in the middle-ground.



Photo H: Photo taken from Victoria Avenue facing south towards 7834 Victoria Avenue (APN 1192-281-10). Vacant land is visible in the foreground.

SOURCE: Dudek 2021

DUDEK

FIGURE 3A-C

Existing Conditions

6th Street and Victoria Avenue Warehouse Project

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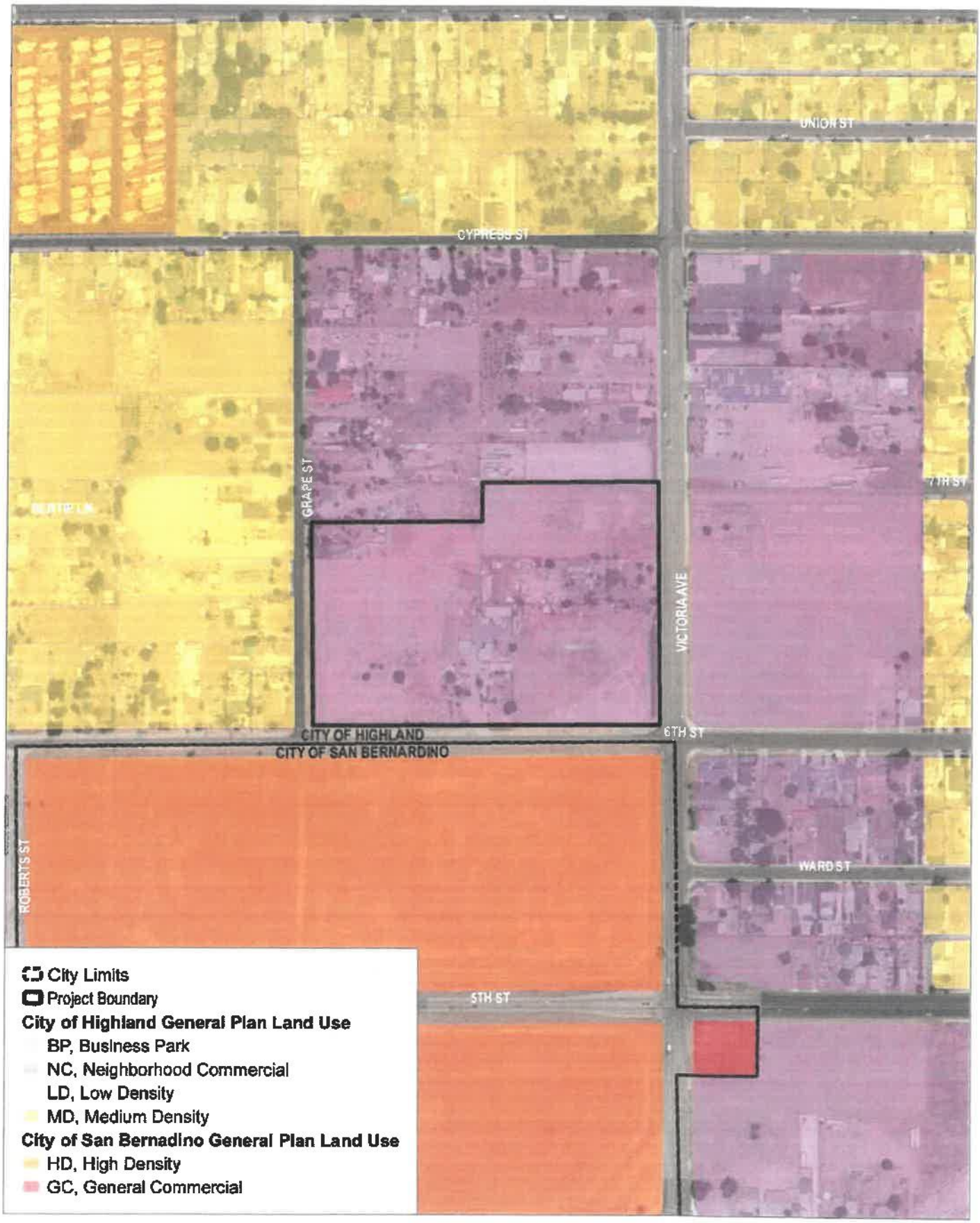

SOURCE: Bing Maps, City of Highland 2021, County of San Bernadino 2021

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FIGURE 4

General Plan Land Use

6th Street and Victoria Avenue Warehouse Project

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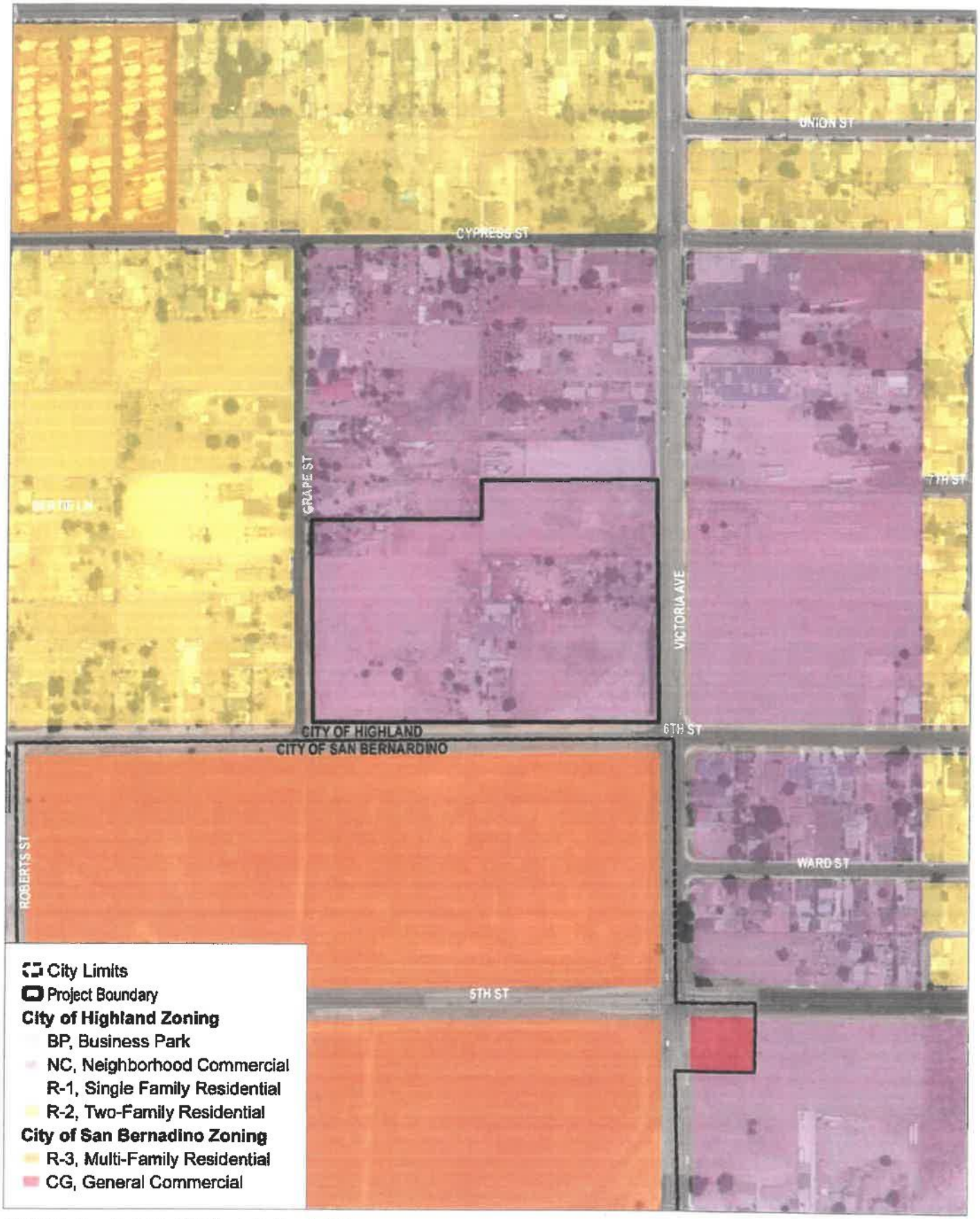

SOURCE: Bing Maps, City of Highland 2021, County of San Bernadino 2021

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FIGURE 5

Zoning

6th Street and Victoria Avenue Warehouse Project

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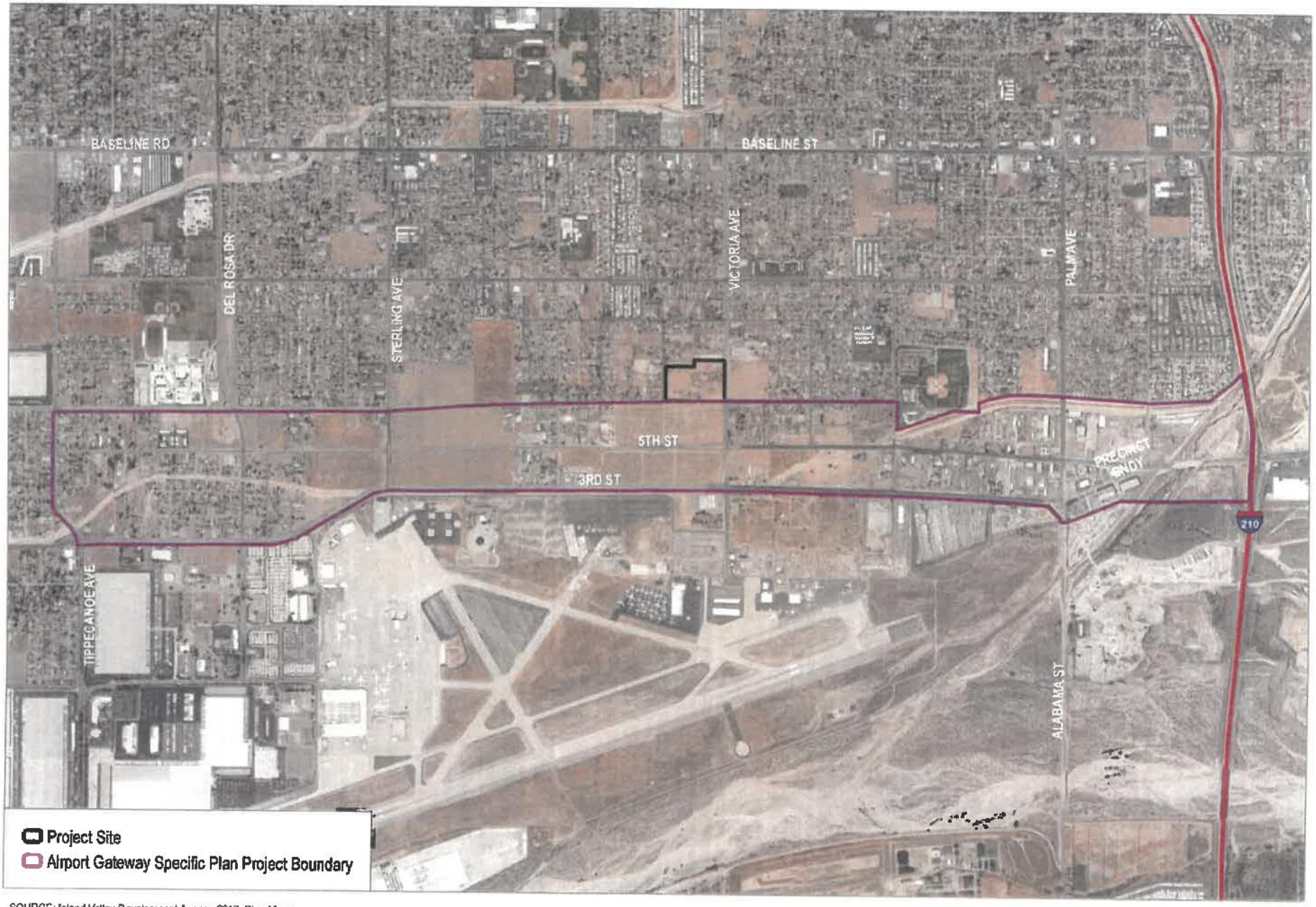

SOURCE: Inland Valley Development Agency 2017, Bing Maps

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FIGURE 6

Airport Gateway Specific Plan

6th Street and Victoria Avenue Warehouse Project

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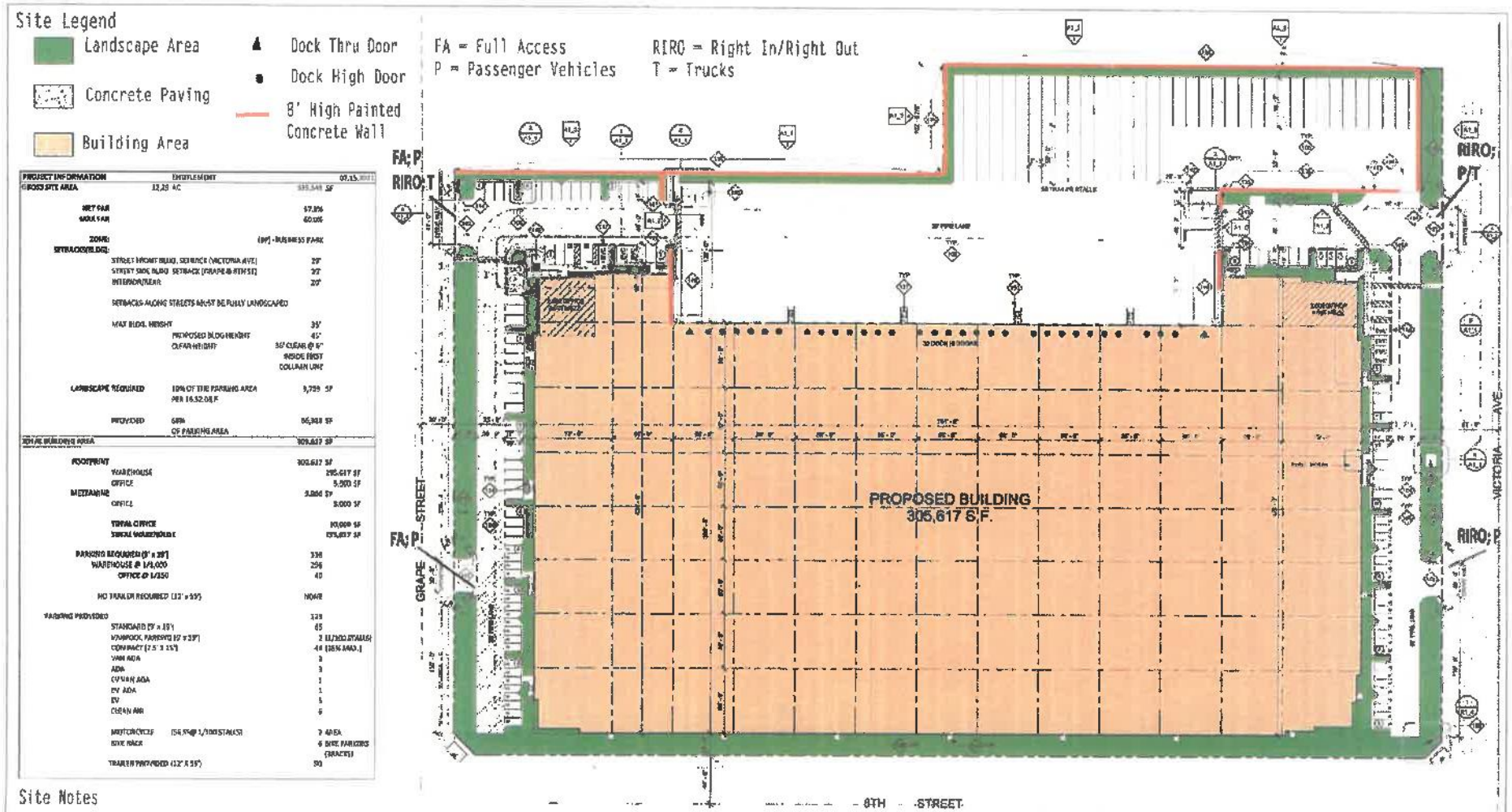

Site Notes

102 PROPOSED DRIVEWAY.
105 CONCRETE PAVING.
106 PROPOSED LANDSCAPED AREA.
114 ACCESSIBLE SITE ENTRANCE SIGN.
124 EXERIOR CONCRETE LANDING.
127 CONCRETE STAIR.
135 PAINTED CONCRETE TILT-UP SCREEN WALL OR TRASH ENCLOSURE WALL.
140 TRASH ENCLOSURE w/ ROOF COVERING.
143 PAINTED STEEL ROLLING GATE(S) WITH KNOX BOX AS REQUIRED BY FIRE AUTHORITY.
144 PAINTED STEEL SWINGING GATE(S) WITH KNOX BOX AS REQUIRED BY FIRE AUTHORITY.
149 CONCRETE TRUCK RAMP w/ 42" HIGH CONCRETE TILT-UP GUARD ON OPEN SIDE(S).
150 STEEL PIPE BOLLARD PROTECTION POST.
159 MONUMENT SIGN.
168 PROVIDE MOTORCYLCE PARKING SPACE.

Source: Herdman Architecture & Design 2021

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FIGURE 7
Site Plan
6th Street and Victoria Avenue Warehouse Project

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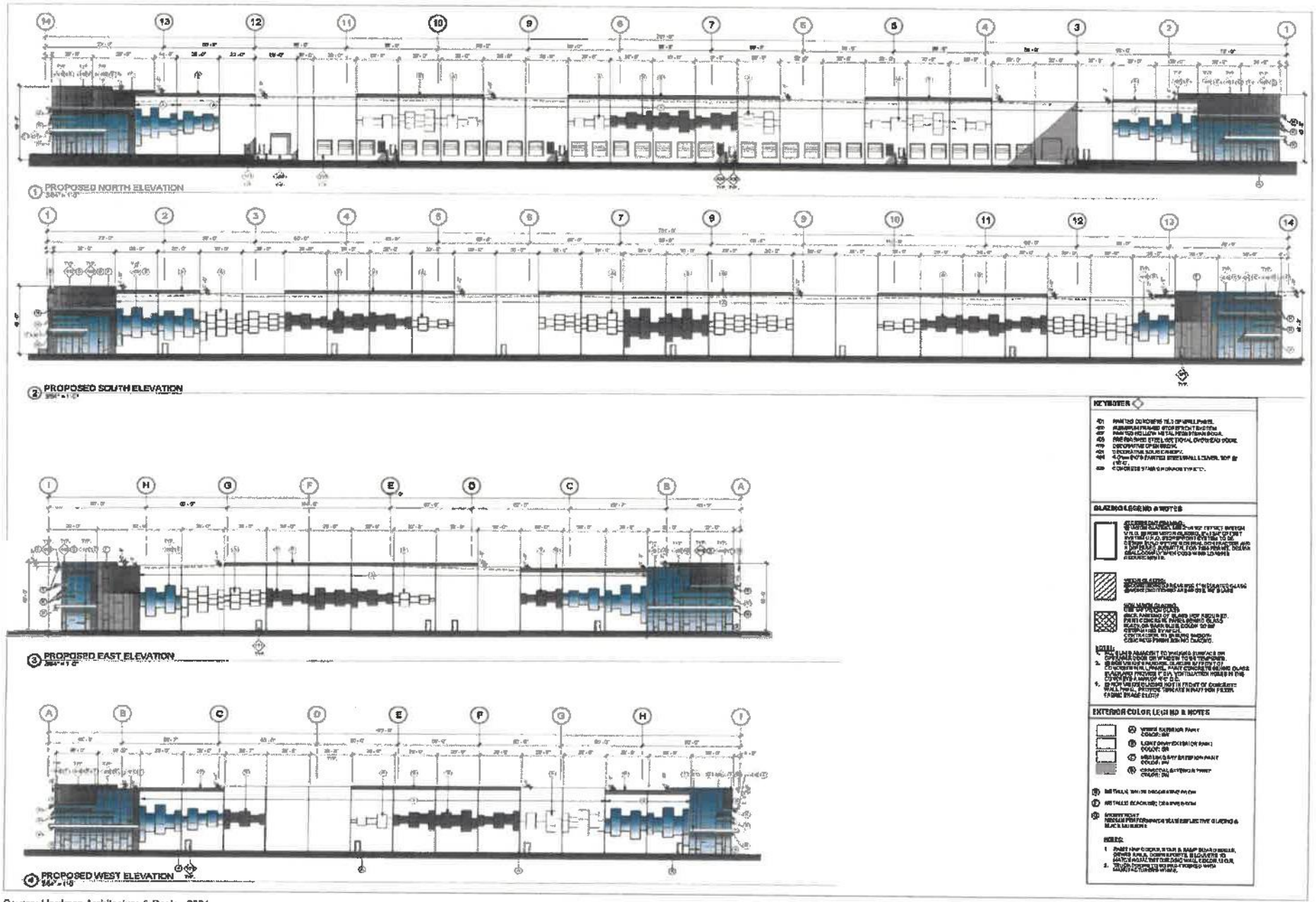

Source: Herdman Architecture & Design 2021

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FIGURE 8

Conceptual Elevations

6th Street and Victoria Avenue Warehouse Project

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Source: Herdman Architecture & Design 2021

DUDEK

FIGURE 9A
Conceptual Rendering
6th Street and Victoria Avenue Warehouse Project

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NORTH WEST CORNER

Source: Herdman Architecture & Design 2021

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FIGURE 9B

Conceptual Rendering

6th Street and Victoria Avenue Warehouse Project

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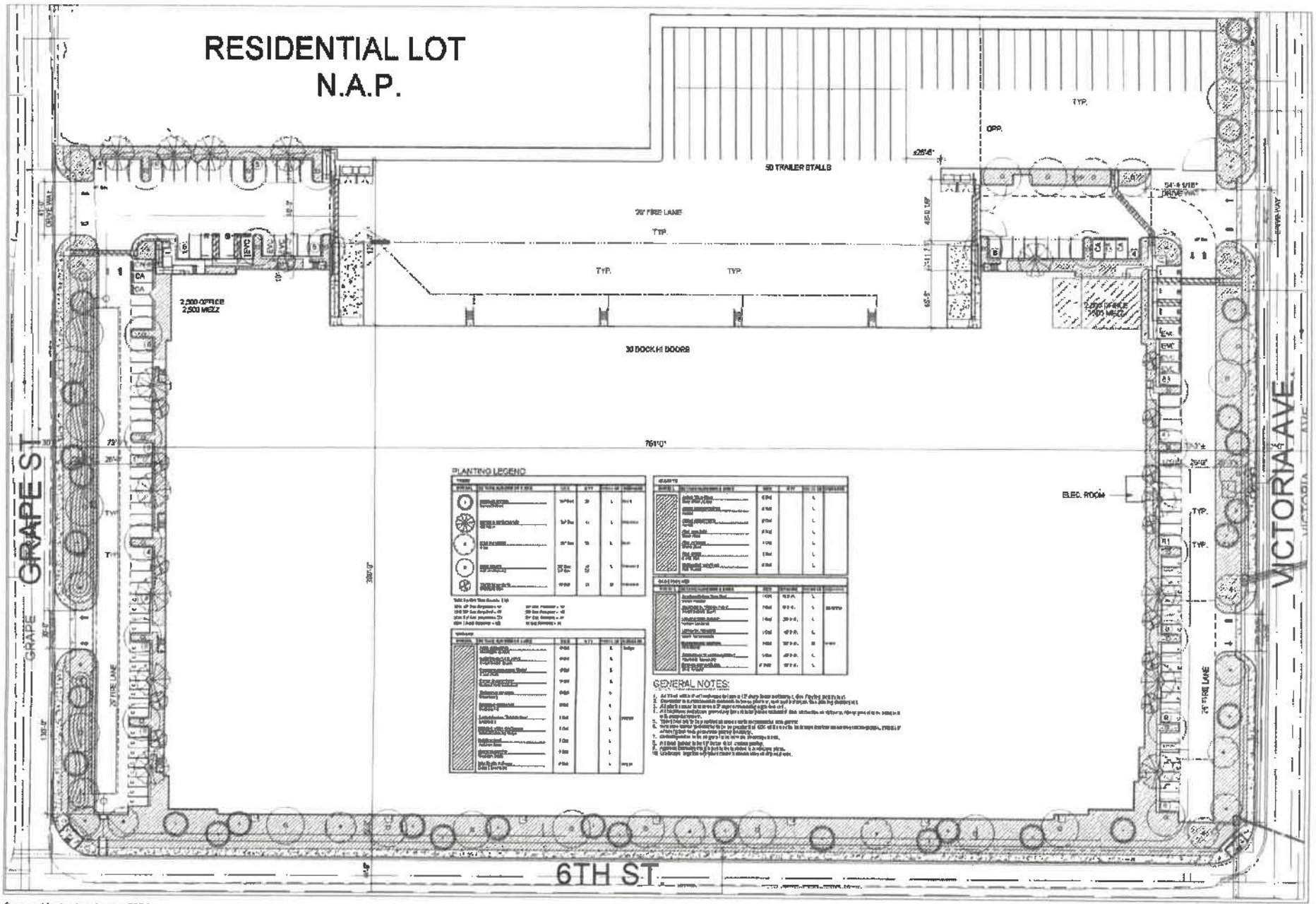

Source: Hunter Landscape 2021

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FIGURE 10

Conceptual Landscape Plan

6th Street and Victoria Avenue Warehouse Project

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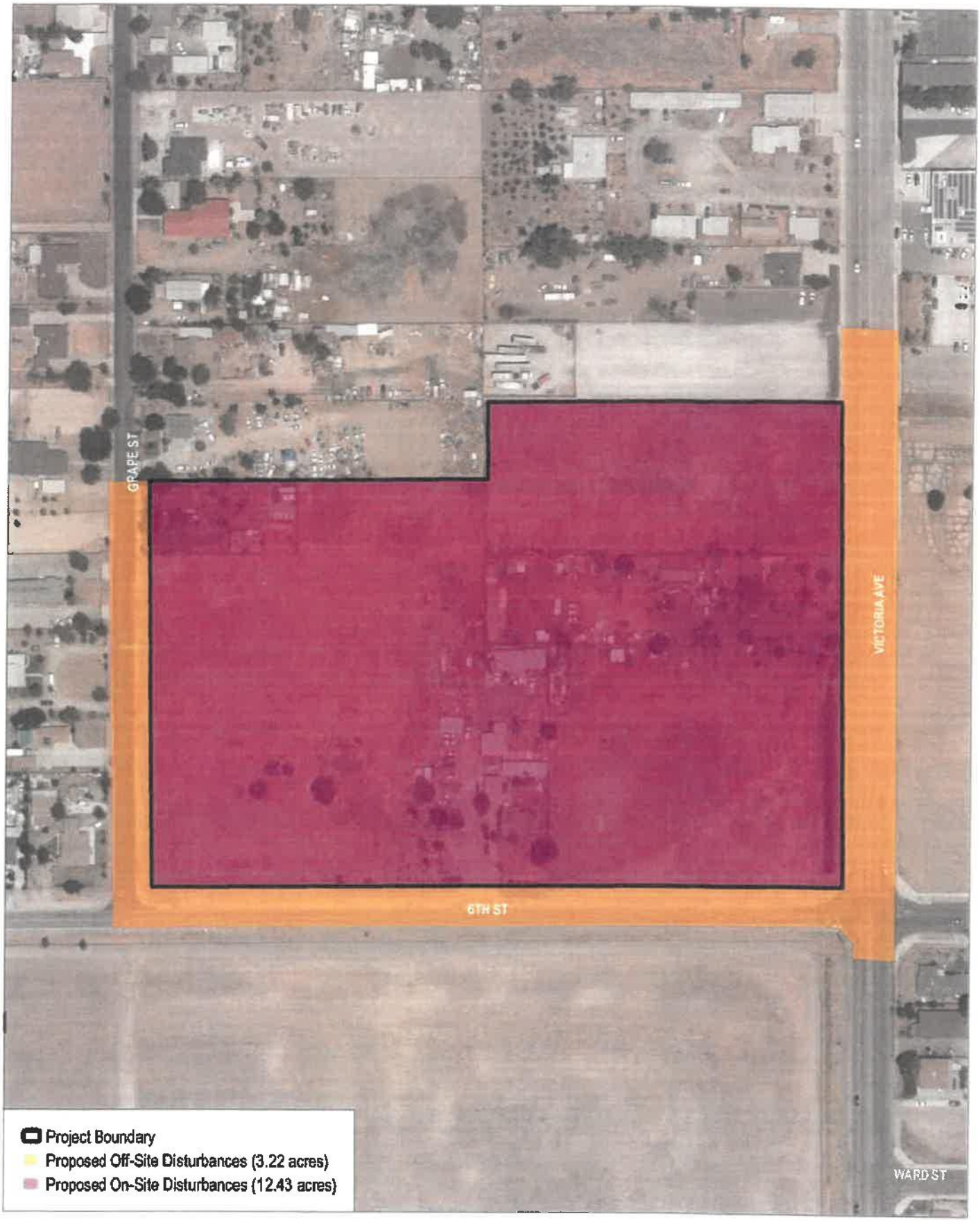

SOURCE: Bing Maps

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FIGURE 11

Proposed Physical Disturbances

6th Street and Victoria Avenue Warehouse Project

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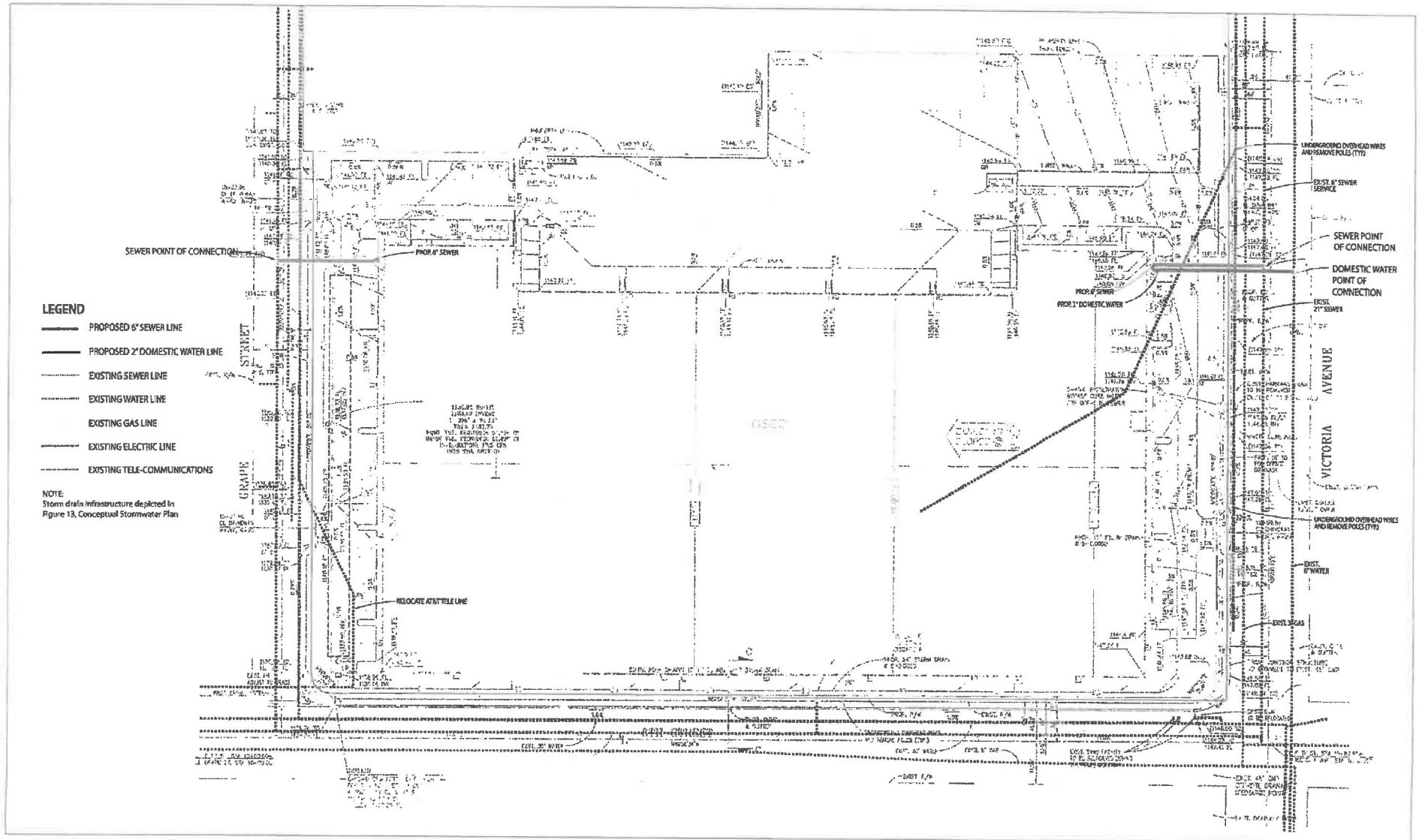

SOURCE: HUITT-ZOLLARS 2021

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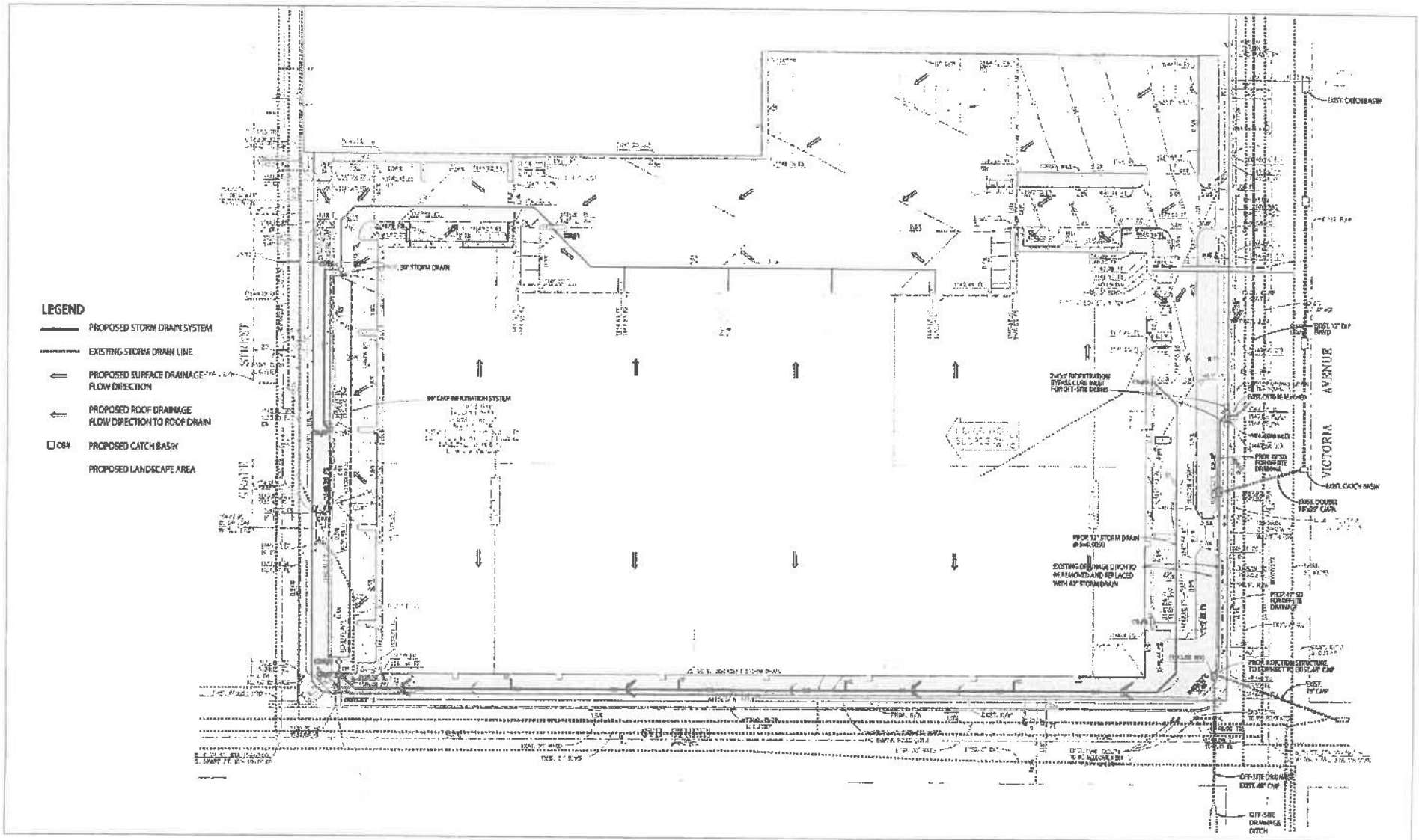
FIGURE 12
Conceptual Utilities Plan
5th Street and Victoria Avenue Warehouse Project



SOURCE: KUTT-ZOLLARS 2021

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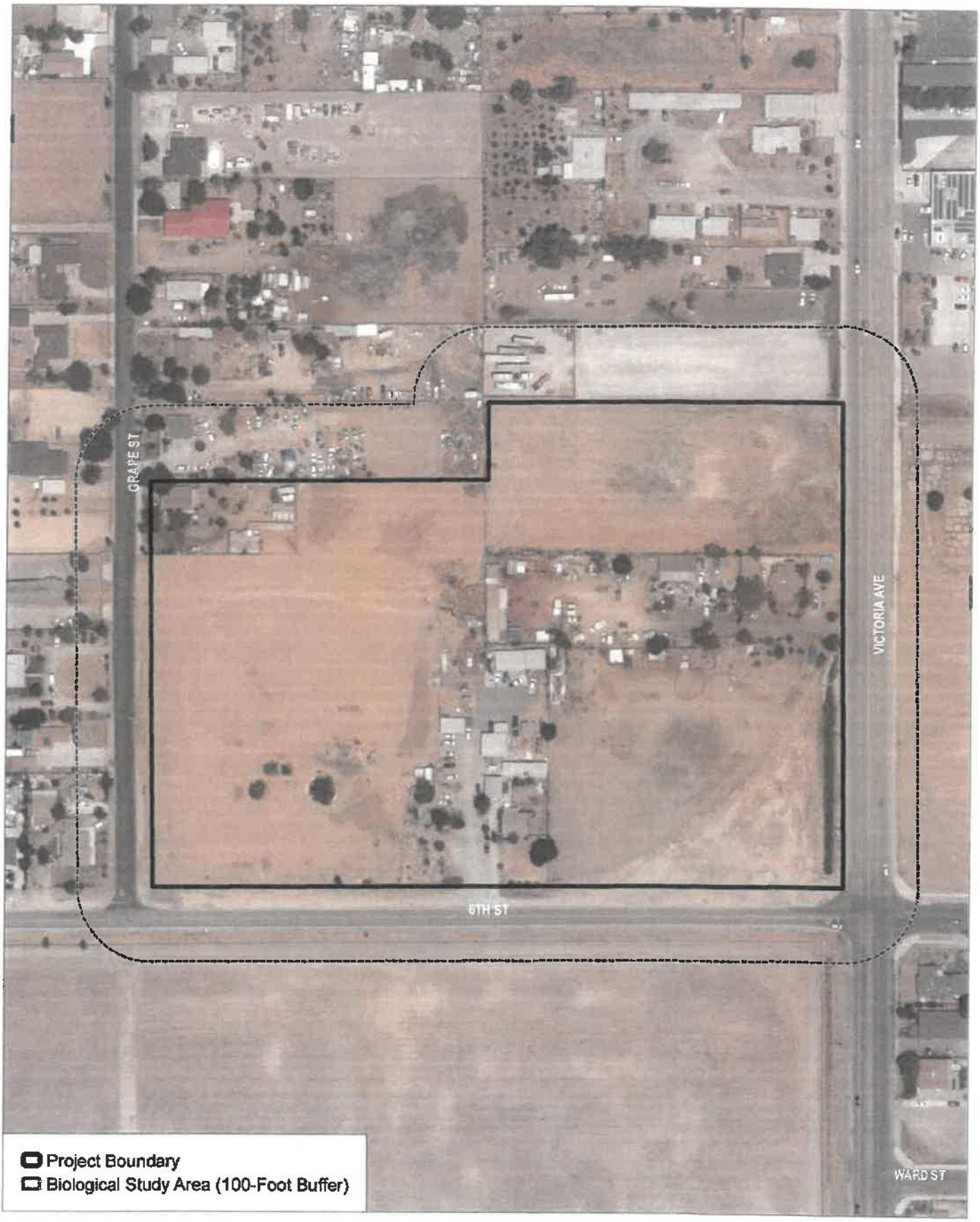
FIGURE 13

Conceptual Stormwater Plan

8th Street and Victoria Avenue Warehouse Project



SOURCE: Bing Maps

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FIGURE 14

Biological Study Area

6th Street and Victoria Avenue Warehouse Project

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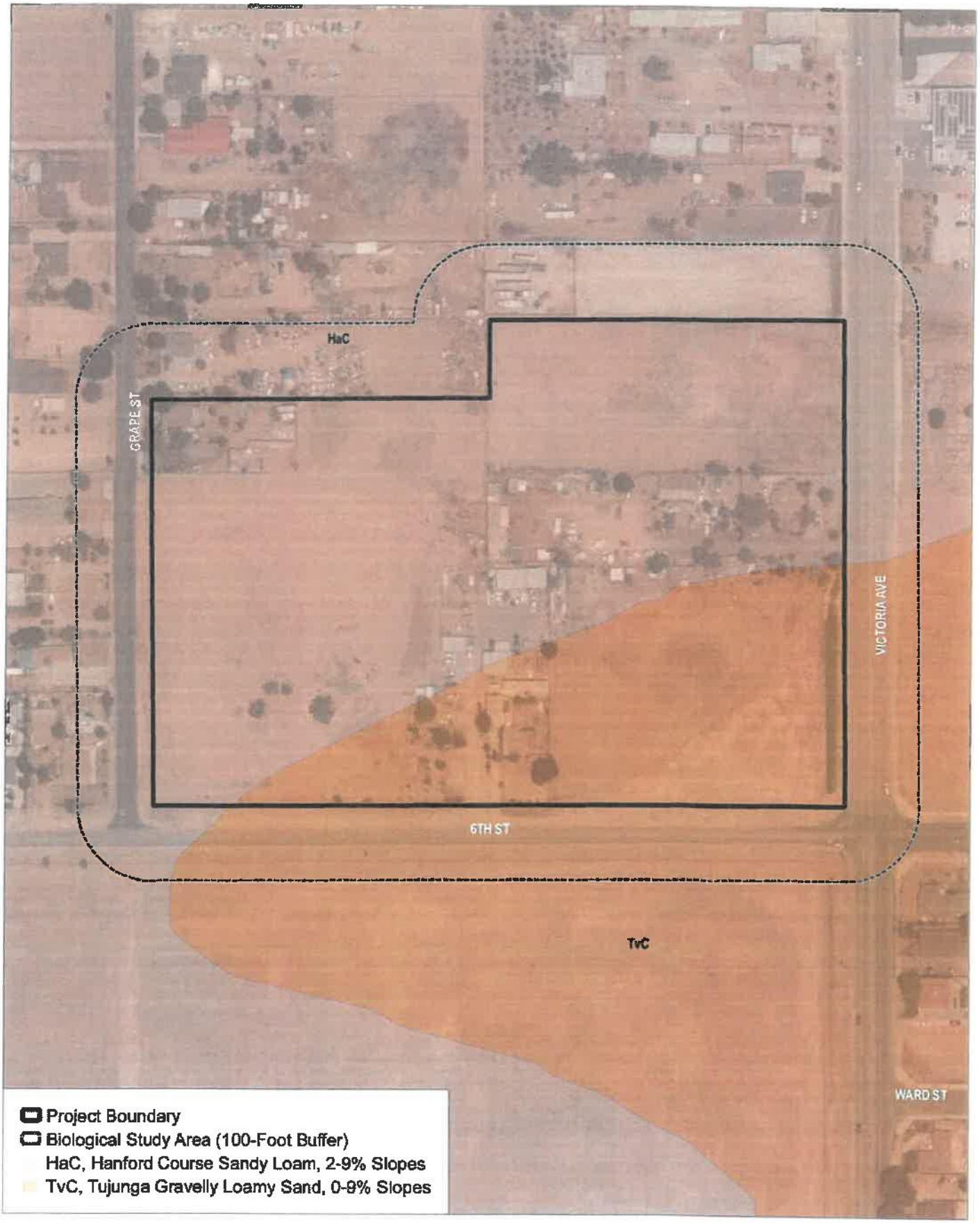

SOURCE: Bing Maps, USDA 2021

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FIGURE 15

Soils

6th Street and Victoria Avenue Warehouse Project

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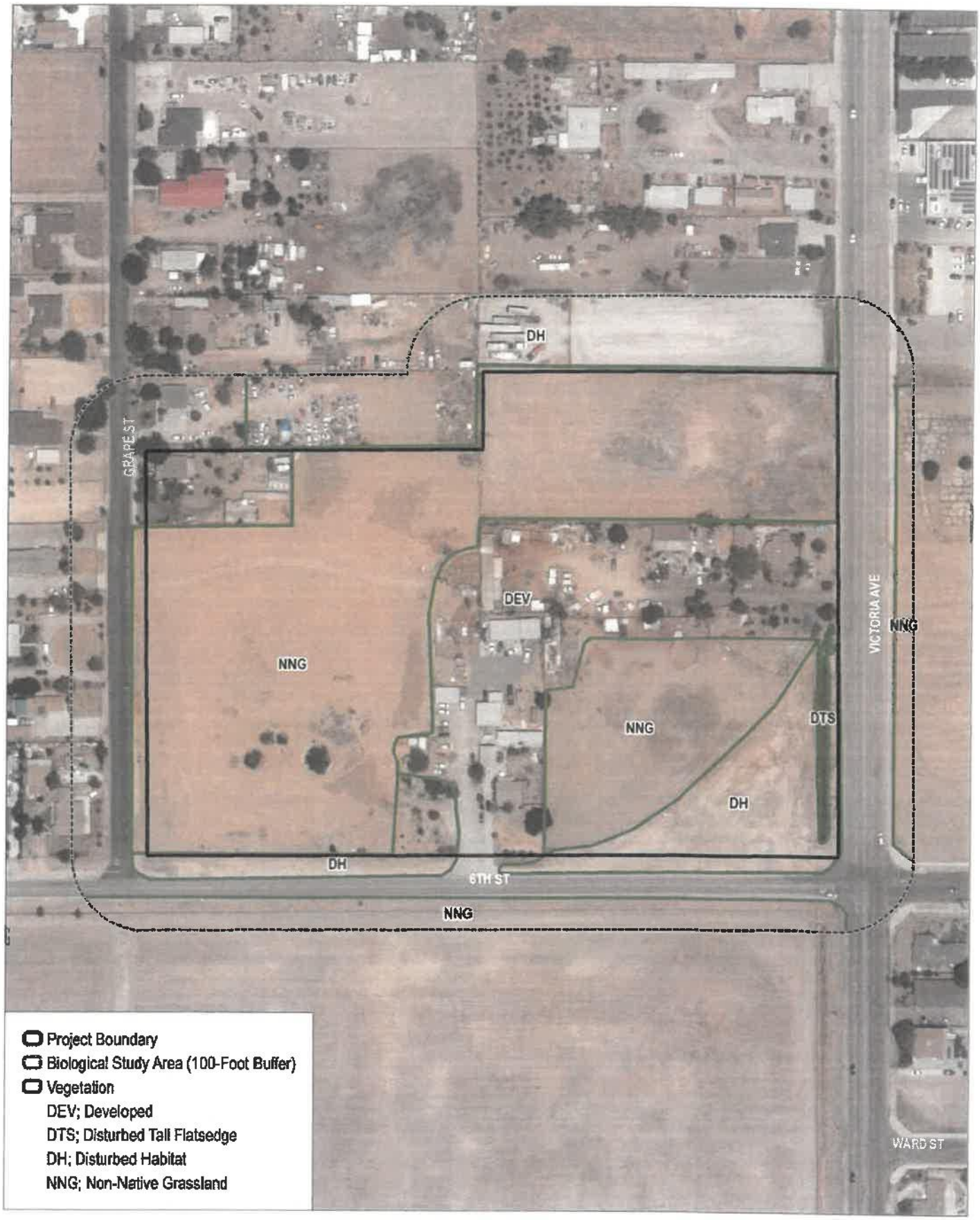

SOURCE: Bing Maps

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FIGURE 16

Vegetation Communities

6th Street and Victoria Avenue Warehouse Project

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SOURCE: Bing Maps

DUDEK

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FIGURE 17

Noise Measurement Locations

6th Street and Victoria Avenue Warehouse Project

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Final Initial Study/Mitigated Negative Declaration, Responses to Comments, and Errata

6th Street and Victoria Avenue Warehouse Project

DECEMBER 2021

Prepared for:

CITY OF HIGHLAND
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APPENDICES

A Comment Letters

B VMT Memorandum

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1 Introduction

An Initial Study/Mitigated Negative Declaration (IS/MND) was prepared for the proposed 6th Street and Victoria Avenue Warehouse Project (project) and made available for public comment for a 34-day public review period from November 5, 2021, through December 9, 2021. In accordance with the California Environmental Quality Act (CEQA) Guidelines, Section 15074(b) (14 CCR 15074(b)), before approving the proposed project, the City of Highland (City), as the lead agency under CEQA, will consider the IS/MND with any comments received during this public review period. Specifically, Section 15074(b) of the CEQA Guidelines (14 CCR 15074(b)) states the following:

Prior to approving a project, the decision-making body of the lead agency shall consider the proposed negative declaration or mitigated negative declaration together with any comments received during the public review process. The decision-making body shall adopt the proposed negative declaration or mitigated negative declaration only if it finds on the basis of the whole record before it (including the initial study and any comments received), that there is no substantial evidence that the project will have a significant effect on the environment and that the negative declaration or mitigated negative declaration reflects the lead agency's independent judgment and analysis.

The agencies and individuals who provided substantive written comments on the environmental issues addressed in the Draft IS/MND are listed in Table 1. Although CEQA (California Public Resources Code, Section 21000 et seq.) and the CEQA Guidelines (14 CCR 15000 et seq.) do not explicitly require a lead agency to provide written responses to comments received on an IS/MND, the lead agency may do so voluntarily. Individual comments within each communication are numbered so comments can be cross-referenced with responses. The comment letters received during the public review period are included in **Appendix A**.

Table 1. Comment Letter Summary

Letter Number	Commenter	Date
1	Golden State Environmental Justice Alliance *Signed: Gary Ho, Attorney, Blum Collins, LLP*	December 9, 2021
2	City of Redlands, Facilities and Community Services *Signed: Carl Bruce Shaffer, MEP, Airport Supervisor*	December 3, 2021

Note: Comments are provided in Appendix A.

Responses to comments are made in the following text to supplement, clarify, or expand on information already presented in the Draft IS/MND. These responses do not change the significance of determinations made or the severity of potential environmental impacts evaluated in the Draft IS/MND. Section 15073.5(c)(4) of the CEQA Guidelines (14 CCR 15073.5(c)(4)) permits the inclusion of new information within an IS/MND if the additional information "merely clarifies, amplifies, or makes insignificant modifications to the negative declaration."

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2 Responses to Comments

Response to Comment Letter 1

Golden State Environmental Justice Alliance
Gary Ho, Attorney, Blum Collins, LLP
December 9, 2021

1-1 The comment notes that the comment letter has been submitted by Blum Collins on behalf of the Golden State Environmental Justice Alliance. The comment also requests to be added to the public interest list of the project. The City will ensure that the commenter is added to the project's public interest list. This comment serves as an introduction to comments that follow. The concerns introduced in this comment are addressed in Responses to Comments 1-2 through 1-49.

1-2 This comment summarizes the proposed project and does not identify specific areas where the Draft IS/MND is inadequate; therefore, no further response is required.

1-3 This comment states that the Draft IS/MND does not consider relevant environmental justice issues because it does not include cumulative impact analysis. The comment states this is particularly important due to the project site's location in an area that is burdened by pollution and within a census tract that is socioeconomically disadvantaged.

The Draft IS/MND analyzed the project's potential air quality impacts on sensitive receptors within the community and concluded that the project would have a less-than-significant impact on sensitive receptors with regard to TACs and cancer and non-cancer health risks on sensitive receptors. Additionally, Section III (b) of the Draft IS/MND, Air Quality, concluded that the daily maximum operational air pollutant emissions would not exceed the SCAQMD thresholds for all criteria air pollutants. Cumulative air quality impacts were accounted for within the Draft IS/MND's air quality analysis by evaluating the project's criteria air pollutant emissions with respect to the SCAQMD mass daily thresholds, which by their nature, account for the effects of cumulative development (i.e., air quality is primarily a regional issue and ambient air quality standards are incorporated into project-level thresholds).

Additionally, neither the City, the SCAQMD, nor the State CEQA Guidelines include thresholds that consider environmental justice such as the CalEnviroScreen results, but rather account for the potential health effects of a project with project-level thresholds. As such, there is currently no air quality guidance or thresholds to analyze areas with higher pollution burden differently from areas with lower pollution burden.

Regarding air quality and adverse health effects, the project's regional and localized operational emissions would not exceed the numerical mass daily or localized significance thresholds established by the SCAQMD for any criteria air pollutant. In addition, the project's operational TAC emissions did not exceed the SCAQMD operational health risk thresholds for cancer and non-cancer risk. The commenter provides no substantial evidence that the technical studies or the conclusions of the IS/MND are incorrect. Therefore, no revisions are required for the Final IS/MND, and no further response is necessary. If an EIR were to be prepared for the proposed project, it would reach the same conclusion. Thus, while this comment is noted and forwarded to the decision-makers for their

consideration, the Draft IS/MND's analysis is adequate as provided and no further response is required.

Lastly, it should be noted that the commenter's statement that 83% of the census tract over the age of 25 has not attained a high school diploma is incorrect. According to CalEnviroScreen 3.0 (OEHHA 2018), 36% of adults over 25 have a less than a high school education; the percentile of 83 means that the percent of adults without a high school education is higher than 83% of the census tracts in California as the California average is 19% of adults over 25 do not have a high school diploma.

1-4 This comment expresses a concern that the Draft IS/MND does not discuss that the project's census tract is identified as a disadvantaged community under SB 535. Neither the City, the SCAQMD, nor the State CEQA Guidelines include thresholds that consider environmental justice, but rather account for the potential health effects of a project with project-level thresholds. As such, there is currently no air quality guidance or thresholds to analyze areas with higher pollution burden differently from areas with lower pollution burden. However, the IS/MND did analyze the projects potential effects to air quality, including health risks, as explain in Response to Comment 1-3, above in compliance with CEQA. Therefore, no further analysis is required and no revisions are necessary to the IS/MND.

1-5 This comment expresses a concern with the Draft IS/MND's analysis of the project's impacts to biological resources, particularly with regard to burrowing owl (*Athene cunicularia*). The comment states that four focused burrowing owl field surveys should have been conducted between April 15th and July 15th per the California Department of Fish and Game's 2012 Staff Report on Burrowing Owl Mitigation.

As discussed in Section 3.4, Biological Resources of the Draft IS/MND, the biological resources analysis was based on a biological resources field assessment survey conducted in March 2021; among other tasks, this survey included creating an inventory of wildlife species observed on the site in addition to determining the potential for special-status wildlife species to occur within the study area based on the presence of vegetation communities/habitats within the project site and a surrounding 100-foot buffer (the biological study area).

Per the results of the March 2021 field survey, the study area is comprised of multiple residential properties with ornamental landscaped vegetation and disturbed areas with non-native vegetation (non-native grassland) along the western, northern, and southeastern portions of the project site. Using this habitat information and relevant literature as described in Section 3.4 of the Draft IS/MND, tables analyzing the potential for special-status wildlife species, including burrowing owl, to occur within the study area were created; they are included within the Draft IS/MND as Appendix B, Biological Resources Attachments. The analysis in the Wildlife Species Potential to Occur table (Appendix B-3 of the Draft IS/MND) concluded that there is, at most, low potential for burrowing owl to occur within the project site given the highly disturbed nature of the non-native grassland on the site (which displayed evidence of recent mowing). The analysis also confirms that the surveying biologist observed no potential burrowing owl burrows within the study area during the reconnaissance survey; these are defined as burrows greater than 11 cm in diameter, according to the 2012 Staff Report on Burrowing Owl Mitigation. Accordingly, the species was given a low potential to occur due to the lack of suitable habitat and burrows within the study area.

Per the CDFW 2012 Staff Report on Burrowing Owl Mitigation (page 5), the first step in evaluating project impacts to burrowing owl is conducting a habitat assessment, data collection, and reporting.

The report continues to discuss the need for focused burrowing owl surveys only in the event that the habitat assessment revels "burrowing owl habitat or sign" on or adjacent to (within 150 meters) a project site. Per Appendix B of the 2012 Staff Report on Burrowing Owl Mitigation: "Burrowing owl habitat generally includes, but is not limited to, short or sparse vegetation (at least at some time of year), presence of burrows, burrow surrogates or presence of fossorial mammal dens, well-drained soils, and abundant and available prey."

While areas of short/sparse vegetation were observed on and adjacent to the project site in the March 2021 field assessment, suitable burrows, burrow surrogates and/or fossorial mammal dens were completely lacking. Accordingly, the survey concluded that no burrowing owl habitat or sign was present. Thus, protocol surveys should not be required.

As discussed above, burrowing owl habitat is not present on the site and the species was analyzed as having a low potential to occur on the project site. Per the 2012 Staff Report on Burrowing Owl Mitigation, focused surveys are not warranted in areas without suitable burrowing owl habitat and the biological resources analysis in the Draft IS/MND is consistent with this approach.

In summary, the Draft IS/MND adequately and appropriately analyzed the project's potential impacts to biological resources, including burrowing owl. Therefore, the Draft IS/MND is adequate as provided and no revisions to the Draft IS/MND are required.

1-6 This comment summarizes the Draft IS/MND's discussion pertaining to the project site's proximity to the San Bernardino International Airport and Trade Center (SBIA), located approximately 0.3 miles south of the project site. The comment states that the Draft IS/MND did not adequately or accurately analyze the project in accordance with Federal Aviation Administration (FAA) requirements or goals, policies, and actions of the City's General Plan, which are subsequently provided. This comment serves as a response to comments that follow. Preliminarily, as noted in the IS/MND, "The San Bernardino Airport Land Use Plan is currently being drafted and was not available at the time of this report." These concerns are addressed in Responses to Comments 1-7 through 1-16.

1-7 This comment restates Airport Element Goal 11.1:- Policy 3, which states that the City should ensure compliance of new development with noise standards in the Code of Federal Regulations and California Airport Noise Regulations. As noted in the IS/MND, "The San Bernardino Airport Land Use Plan is currently being drafted and was not available at the time of this report. Nonetheless, the Federal Aviation Administration Regulations Title 14 Part 77 determines restrictions to obstructions and height limitations for structures taller than 200 feet or within 20,000 feet of an airport." The IS/MND further states that "According to Exhibit 4H (Existing and Ultimate Noise Contours) of the Airport Layout Plan Narrative Report for San Bernardino International Airport (SBIAA 2010), the SBIA's 65 dBA CNEL ultimate noise contour would be located more than 0.5 miles south of the project site." The City has noise standards established within the City's Municipal Code that has incorporated the noise standards in the Code of Federal Regulations and California Airport Noise Regulations. The project would comply with the noise standards in the City's Municipal Code, therefore, the project would comply with Airport Element Goal 11.1:- Policy 3; therefore, the analysis is in the IS/MND is adequate as provided and no revisions to the Draft IS/MND are required.

1-8 This comment restates Airport Element Goal 11.1:- Policy 4, which states that the City should ensure adherence to standards in the California Building Code (CBC) that govern acceptable interior noise

levels associated with exterior airport noise sources. The project would be designed consistent with the latest version of the California Building Code and project plans are checked by City staff during the plan-check process. See above response regarding applicable City guidelines. Because the project would comply with the City's noise standards, the analysis is in the IS/MND is adequate as provided and no revisions to the Draft IS/MND are required.

1-9 This comment restates Airport Element Goal 11.2, which states that the City should reduce the risk to people and property by limiting the type and intensity of development in identified impact areas, ensuring adequate emergency response facilities within or adjacent to airport uses, and requiring adequate public notification of safety policies and procedures. As noted in the IS/MND, "The San Bernardino Airport Land Use Plan is currently being drafted and was not available at the time of this report" however, the project would be consistent with the general plan land use of the area which was prepared to adequately site uses throughout the City. Therefore, because the project would comply with underlying land use and zoning for the project site, the analysis is in the IS/MND is adequate as provided and no revisions to the Draft IS/MND are required.

1-10 This comment restates Airport Element Goal 11.2:- Policy 1, which states that the City should evaluate land use compatibility and safety issues in designated Airport Influence Areas (AIAs) by: Coordinated planning with regional planning authorities; Compliance with applicable Airport Master Plans, Federal Aviation Administration (FAA) requirements and the California Airport Land Use Planning Handbook. The City evaluated land use compatibility and safety issues in designated Airport Influence Areas when determining the general plan land use designations and zoning. As stated in the Draft IS/MND, the project site is within the Airport Influence Area, however, the project would be consistent with the general plan land use of the area. Therefore, the project would be consistent with Airport Element Goal 11.2:- Policy 1.

1-11 This comment restates Airport Element Goal 11.2:- Policy 2, which states that the City should limit the type and intensity of development in designated Airport Influence Areas (AIAs). As noted in the IS/MND, "The San Bernardino Airport Land Use Plan is currently being drafted and was not available at the time of this report." Nonetheless, as stated in the Draft IS/MND, while the project site is within the Airport Influence Area, the project would be consistent with the general plan land use of the area. Therefore, the project would be consistent with Airport Element Goal 11.2:- Policy 2.

1-12 This comment restates Airport Element Goal 11.2:- Policy 3, which states that the City should avoid siting sensitive uses, especially residences, schools and hospitals, nearby airport runways or along approved flight paths. The proposed project is an industrial/warehouse facility in an area with a general plan land use designation and zoning of business park. Therefore, the project would not be a sensitive use and the project would comply with Airport Element Goal 11.2:- Policy 3.

1-13 This comment restates Airport Element Goal 11.2:- Policy 4, which states that the City should encourage the development of open space areas in Highland adjacent to designated airport safety zones. As stated in the Draft IS/MND, the project site is within the Airport Influence Area, which encompasses the majority of the City. There are various additional airport overlay zones ranging from low to very high risk levels, but the project site is not within any of these overlay zones. The Airport Influence Zone, as stated on the City's Zoning Map has a negligible risk level. Therefore, the project is not within an airport safety zone and the project would be consistent with Airport Element Goal 11.2:- Policy 4.

1-14 This comment restates Airport Element Goal 11.2:- Action 1, which states that the City should establish occupancy requirements (i.e., noise mitigation and height restrictions) within established airport easement or overflight areas as a condition of approval for new development. The comment does not address the adequacy of the analysis in the IS/MND or provide any substantial evidence that the project would result in an increased risk, rather, the comment is directed at the City. Nonetheless, as stated in the IS/MND, the Federal Aviation Administration Regulations Title 14 Part 77 determines restrictions to obstructions and height limitations for structures taller than 200 feet or within 20,000 feet of an airport." The proposed project would no exceed 200 feet (maximum height of 45 feet). Further, the analysis in the IS/MND determined the project would comply with all applicable noise guidelines. The project would also be consistent with the land use and zoning requirements of the City. Therefore, the analysis in the IS/MND is adequate and no revisions are necessary.

1-15 This comment restates Airport Element Goal 11.3 - Policy 3, which states that the City should provide adequate transitions and/or buffers between existing residential neighborhoods and industrial and other incompatible land uses. The City evaluated land use compatibility and transition areas between these uses when determining the general plan land use designations and zoning. As stated in the Draft IS/MND, the project is consistent with the general plan land use designation and zoning, therefore, the project would be consistent with Airport Element Goal 11.3 - Policy 3. Therefore, the analysis in the IS/MND is adequate and no revisions are necessary.

1-16 This comment serves as a summary for Comments 1-7 through 1-15, restates Airport Element Goal 11.2:- Policy 1 and Airport Element Goal 11.2:- Policy 2, and states an EIR must be prepared because the proposed project exceeds the allowable General Plan intensity of 0.45 FAR. Responses relating to Airport Element Goal 11.2:- Policy 1 and Airport Element Goal 11.2:- Policy 2 are provided in Response to Comments 1-10 and 1-11. Please refer to Response to Comment 1-17 for a response to the floor area ratio (FAR) aspect of the comment.

1-17 This comment expresses a concern with the project's floor area ratio (FAR) with regard to intensities allowed within the Business Park General Plan land use designation. The General Plan is a general guide for planning and land uses across the City. As stated in the General Plan on page 2-8,

"Land use designations define the amount, type, and nature of future development that is allowed in a given location of the City. The following section defines each of the land use designations shown on the Land Use Plan, as well as the density and intensity standards required in accordance with State law.

Each of the General Plan land use designations is typically implemented by a defined set of zoning designations included in the City's Development Code. The Development Code contains the detailed regulations pertaining to permitted and conditional uses, site development standards, and performance criteria that serve to implement many goals and policies of the General Plan."

Specifically, these Development Standards are established in the Land Use and Development Code, Chapter 16 of the City's Municipal Code. The General Plan defines the Development Code as:

> **Development Code.**
> The City of Highland Development Code sets forth the City's standards, guidelines and procedures concerning the development and maintenance of land use. These regulations are intended to implement the goals, objectives, and policies of the General Plan; protect the

physical, social, and economic stability and vitality of Highland residents and their property; reduce or eliminate hazards to the public; and enhance the City's physical, social and economic advantages through comprehensive land use and resource planning

As the comment notes, the proposed project is within a Business Park Employment District. Employment District Development Standards are addressed in the Development Code and regulated by Section 16.24.040 of the Highland Municipal Code, specifically Table 16.24.040.A, which is re-created below.

Table 2. Industrial Site Development Minimum Standards (Table 16.24.040.A)

Requirement	BP	I	OP
1. Minimum parcel size	1 AC	1 AC	10 K sq. ft.
2. Minimum site width (in feet)	150	200	80
3. Minimum site depth (in feet)	150	200	100
4. Minimum front building setback area (in feet)	20	20	20
5. Minimum interior side building setback area (in feet)	20	0	20
6. Minimum street side building setback area (in feet)	20	20	20
7. Minimum rear building setback area (in feet)	20	0	20
8. Maximum building height (in feet)	35	50	35
9. Maximum lot coverage	60%	60%	60%

As identified in Table 16.24.040.A, the Maximum Lot Coverage is 60%; however, there is no Development Standard for Floor Area Ratio for Business Park uses. With respect to Lot Coverage, the proposed project would achieve a Lot Coverage of approximately 56.1% (300,617SF / 535,549 SF) which is below the Lot Coverage threshold in the Land Use and Development Code.

The comment also notes that Table 2.2 - Nonresidential Buildout Estimates of the Land Use Element assumes a probable intensity of 0.30 FAR. The "Probable Intensity" is not intended to set any numeric standard for individual projects; rather, it is used for planning purposes to project build out intensity of certain land uses. It is meant to be an average, factoring in development of all similar uses across the City. While the project exceeds this average, other projects are likely to either develop at or below this average or not develop at all.

Therefore, the proposed project's FAR of .57 does not conflict with the applicable Development Code standards and there is not conflict with the City's Municipal Code or General Plan.

1-18 The comment states that the Draft IS/MND did not provide sufficient analysis with all applicable General Plan policies. Many of the policies in the Highland General Plan not project-specific but rather the responsibility of the City to implement within long-term planning strategies. In addition, the State CEQA Guidelines Appendix G Land Use and Planning thresholds of significance ask whether the project would "Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted *for the purpose of avoiding or mitigating an environmental effect*" (emphasis added).

Additional discussion of the project's potential environmental effects is provided throughout the Draft IS/MND, and as discussed, the project would not result in significant environmental impacts that could result in a significant impact associated with a conflict with a goal or policy included within the General Plan. Nonetheless, in the interest of providing a good faith response to the commenter's concerns, the project's consistency with the specific General Plan policies mentioned in Comment Letter 1 are provided in Responses to Comments 1-19 through 1-26. As discussed, the project is consistent with these policies and no new impacts would occur. If an EIR were to be prepared for the proposed project, it would reach the same conclusions regarding project consistency and preparation of an EIR would not be necessary.

1-19 This comment restates Land Use Goal 2.6 - Policy 1, which states that the City should require that new development be at an appropriate density or intensity based upon compatibility with surrounding existing and planned land uses. As stated in the Draft IS/MND, the project would be consistent with the general plan land use and zoning of the area. Additionally, the project would be consistent with the applicable density for the zoning of Business Park. Therefore, the project would be consistent with Land Use Goal 2.6 - Policy 1.

1-20 This comment restates goals and policies from the City's Airport Element. These goals and policies were provided in Comments 1-7 through 1-16. Please refer to Responses to Comments 1-7 through 1-16 in which consistency with these goals and policies is addressed.

1-21 This comment restates Public Health & Safety Element Goal 6.7 - Policy 1, which states that the City should require the review of all new development in proximity to the San Bernardino International Airport for compliance with Federal Aviation Administration (FAA) requirements and the California Airport Land Use Planning Handbook with adopted plans. The City evaluated land use compatibility and safety issues in designated Airport Influence Areas when determining the general plan land use designations and zoning. As stated in the Draft IS/MND, the project site is within the Airport Influence Area, however, the project would be consistent with the general plan land use of the area. Therefore, the project would be consistent with Public Health & Safety Element Goal 6.7 - Policy 1.

1-22 This comment restates Public Health & Safety Element Goal 6.7 - Policy 2, which states that the City should evaluate the compatibility of airport uses, activities, and operations with all new development in proximity to the San Bernardino International Airport prior to approval and protect sensitive uses, such as residences, schools, hospitals, and libraries from overflight areas. The proposed project is an industrial/warehouse facility in an area with a general plan land use designation and zoning of business park. Therefore, the project would not be a sensitive use and the project would comply with Public Health & Safety Element Goal 6.7 - Policy 2.

1-23 This comment restates Conservation and Open Space Element Goal 5.7 - Policy 6, which states that the City should ensure that required biological assessments are conducted in cooperation with the California Department of Fish and Game and the U.S. Fish and Wildlife Service. Please refer to Response to Comment 1-5 in which consistency with this policy is addressed. The project conducted all required biological assessments in accordance with the applicable requirements, including those of the CDFW and USFWS. No further analysis is required and no revisions to the IS/MND are necessary.

1-24 This comment restates Circulation Element Goal 3.1 - Policy 7, which states that the City should monitor the intensity of land use to keep traffic on any arterial in balance with roadway capacity. As described

in Response to Comment 1-17, above, the proposed intensity of land use is consistent with the underlying zoning requirements for Industrial uses within the Business Park land use category. Therefore, the project would comply with this policy and no further analysis is required and no revisions to the IS/MND are necessary.

1-25 This comment restates Circulation Element Goal 3.1 - Policy 8, which states that the City should require development proposals with the potential to generate traffic volumes or other impacts not adequately evaluated in the Circulation Element and the General Plan Program EIR to prepare a traffic analysis consistent and compatible with the City's Master General Plan Traffic Model. As described above, the proposed intensity of land use is consistent with the underlying zoning requirements for Industrial uses within the Business Park land use category anticipated by the General Plan. Further, under CEQA, level of service can no longer be used as a threshold for determining a project's potential effects on the environment, therefore, an LOS analysis would not result in impacts that are required to be disclosed in the IS/MND. The analysis provided in the IS/MND adequately addresses the proposed project's impacts on transportation and no further analysis is required.

1-26 This comment restates Circulation Element Goal 3.1 - Policy 9, which states that the City should restrict the number of access points and intersections along arterials to preserve mid-block and intersection capacities and to maintain public safety. The proposed project has been through several iterations to ensure appropriate access to the project site is provided. Improvements have been planned in accordance with all applicable design and engineering standards to ensure public safety. Further, it is noted the proposed project would consolidate several lots into one unified project under a development plan that ensures fewer driveways along the Victoria and 6th Avenues corridors.

1-27 Consistency with SCAG's 2020-2045 Connect SoCal RTP/SCS & Due to errors in modeling and modeling without supporting evidence, as noted throughout this comment letter and attachments, the proposed project has significant potential for inconsistency with Goal 5 to reduce greenhouse gas emissions and improve air quality, Goal 6 to support healthy and equitable communities, and Goal 7 to adapt to a changing climate. No clarification is provided regarding which modeling inputs are incorrect, however, it can be assumed that this comment references subsequent comments in which the commenter states that the Draft IS/MND's air quality, greenhouse gas emission, and transportation-related impacts are incorrectly analyzed. Refer to Response to Comments 1-38 through 1-46 in which responses are provided to concerns regarding model inputs. As discussed within these responses, the model inputs used to calculate and analyze the project's air quality, greenhouse gas emissions, and transportation-related impacts were correctly and appropriately selected and the Draft IS/MND is adequate as provided. As discussed throughout the Draft IS/MND, the project would not result in significant impacts with regard to air quality or greenhouse gas emissions. Accordingly, the project would not conflict with Goal 5 (reduce GHG emissions and improve air quality), Goal 6 (support healthy and equitable communities), and Goal 7 (adapt to a changing climate). If an EIR were to be prepared for the proposed project, it would reach the same conclusions regarding project consistency with the 2020-2045 RTP/SCS. Because no new environmental issues were identified, no further analysis is necessary.

1-28 The comment expresses a concern with the Draft IS/MND's discussion regarding the labor force that would be needed to construct the project. Construction would occur over approximately 9 months, and according to Section 3.14, Population and Housing, of the Draft IS/MND, the number of construction workers needed during any given period would largely depend on the specific stage of construction but

would likely average a few dozen workers at any given time throughout the workday. Based on information provided by the project applicant, they intend to construct the project using a licensed general contractor with full-time staff that are assigned to construction projects on a rotating basis, depending on the nature of the construction phase and the required worker skillsets. As such, the project's construction labor needs would be met by a pool of existing construction workers in the region. The environmental effects (i.e., air pollutant and greenhouse emissions associated with vehicle miles traveled for worker trips) have been accounted for throughout the Draft IS/MND within the project's air quality and greenhouse gas emission analyses. In this case, because the exact locations of where workers trips would originate, the analyses assumed a default worker trip length of 16.6 miles, as recommended for use by the California Air Pollution Control Officers Association (CAPCOA 2017). The project does not involve any specialized construction methods that would require specialized construction workers to be sourced outside of the region. Additionally, construction of the project would not result in substantial unplanned population growth that could cause environmental effects. As such, the Draft IS/MND adequately and accurately describes potential environmental effects associated with construction workers and construction of the project.

1-29 The comment states the IS/MND relied on SCAG's 2001 Employment Density Study to calculate that the proposed project will generate approximately 256 employees. However, newer and more accurate employee estimates are provided by the City's 2006 General Plan Land Use Element. Table 2.2 - Nonresidential Buildout Estimates of the Land Use Element states that the Business Park Land Use designation will generate 1 employee for every 600 square feet of building area, which would equal 510 employees. While the comment is correct that the City's General Plan has an updated metric for employment in "Business Parks", the proposed project is an industrial/warehouse use which is permitted in the Business Park district, but has a different employment generation characteristic than a traditional Business Park. Accordingly, the IS/MND used an appropriate employment generation factor for the project-specific analysis based on the specific use and no further analysis is required; therefore, no revisions are necessary to the IS/MND.

1-30 The comment states that using the higher employment generation factor identified in Comment 1-29 (1 employee for every 600 SF of building area) would result in a project that contributes 12% of the estimated future employment in Highland in the Connect SoCal RTP/SCS employment projections and which would represent a significant impact. As noted in Response to Comment 1-29, above, the IS/MND used the appropriate employment generation factor based on the specific project us (industrial/warehouse) rather than a higher-generating Business Park use. Accordingly, the estimate that the project would generate 256 employees is accurate based on the project-specific data. The model inputs used to calculate and analyze the project's air quality, greenhouse gas emissions, and transportation-related impacts were correctly and appropriately selected and the Draft IS/MND is adequate as provided.

1-31 The comment states that the MND utilizes uncertain and misleading language to conclude the project will have less than significant Transportation impacts relating to the degradation of nearby intersections. Discussion of the nearby intersection operations is included for informational purposes only as level of service (LOS) is no longer required under CEQA. The transportation analysis provided in the MND, including a VMT analysis, determined that the project would have less than significant impacts to transportation CEQA checklist items A through D.

1-32 The comment states that by delaying preparation and review of a Traffic Report in compliance with the City's Traffic Study Guidelines, the project does not comply with CEQA's requirements for meaningful disclosure and implements the project without CEQA review. The comment further states that this is also deferred mitigation and does not comply with CEQA's requirement for meaningful disclosure as the Traffic Report will determine consistency or inconsistency with the City's General Plan policies and goals. Completion of a Traffic Report is not required under CEQA, and a Traffic Report which analyzes LOS is also not required under CEQA. The transportation analysis provided in the MND, including a VMT analysis, determined that no mitigation measures were required; therefore, there would be no deferred mitigation. Preparation of an EIR which includes a Traffic Report analyzing LOS is not warranted.

It should be noted that the Draft IS/MND's VMT analysis was based on a VMT Memorandum prepared by Urban Crossroads in October 2021. This report was initially intended to be included as an appendix to the Draft IS/MND but was inadvertently switched with other non-related materials. This has been corrected and the correct document is included as Appendix B of this Final IS/MND. It should also be noted that the Draft IS/MND's discussion of the project's VMT impacts included almost all of the discussion provided within the VMT Memorandum with the exception of background information and attachments, which had already been summarized and discussed within the Draft IS/MND. As such, the inclusion of the VMT Memorandum does not constitute new information and does not change the significance of the project's impacts with respect to VMT. The addition of the VMT Memorandum is also discussed in Section 3, Errata.

1-33 The comment states that the SBCTA Guidelines are not included for public review, and would not comply with CEQA's requirements for adequate informational documents and meaningful disclosure, and incorporation by reference would not be appropriate as the SBCTA Guidelines contribute directly to analysis of the problem at hand. However, CEQA Section 15150 (a) states that a Negative Declaration may incorporate by reference all or portions of another document which is a matter of public record or is generally available to the public. The SBCTA Guidelines are part of the public record and are generally available to the public. As such, incorporation by reference is appropriate and preparation of an EIR to include the SBCTA Guidelines for review, analysis, and comment by the public and decision makers would not be warranted.

1-34 The comment states that the MND calculates the VMT per service population to be below City VMT levels, even though the project exceeds the allowable FAR intensity, and the MND concludes the project will have less than significant VMT impacts. Preliminarily, please refer to Response to Comment 1-17 regarding the applicable Development Guidelines from the City's Land Use and Development Code. Exceedance of the allowable FAR intensity is not indicative of a significant VMT impact, and a project-specific detailed VMT analysis has been provided in the MND. The comment further states that the calculations provided in the MND are not supported by any meaningful evidence in Appendix H - Traffic Impact Analysis, and that Appendix H downloaded from the City's website only includes eight pages that are all regarding the LOS analysis. Please refer to Response to Comment 1-32, in which it is discussed that the correct VMT Memorandum has been appended to this Final IS/MND and the methodology, analysis, and findings presented in the VMT Memorandum are consistent with those presented in the Draft IS/MND.

1-35 The comment states that the project's truck/trailer activity is unable to utilize public transit and is therefore misleading to the public and decision makers to exclude this portion of the VMT generated by project operations. However, per the California Governor's Office of Planning and Research (OPR)

Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory) and Section 15064.3(a) of the CEQA Guidelines, "'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project." Further, the OPR Technical Advisory states that "the term 'automobile' refers to on-road passenger vehicles, specifically cars and light trucks. Heavy-duty truck VMT could be included for modeling convenience and ease of calculation." As the project generated VMT is defined as the VMT attributed to vehicle trips to and from the project zone(s) and analyzed as VMT per service population (i.e., estimated number of employees for industrial type uses) per City direction, the conclusion made by the commenter regarding truck/trailer VMT is not accurate under CEQA. The project-based VMT is appropriately analyzed, and no further analysis is necessary.

1-36 The comment is a concluding remark that expresses the opinion of the commenter that the Draft IS/MND is flawed and that an EIR must be prepared. The comment provides contact information and requests that the City provide the commenter with all environmental documents, notices, and hearings for the project. As discussed in the responses to Comment Letter 2, the analysis in the Draft IS/MND is consistent, complete, and thorough, and not flawed as asserted by the commenter. No new environmental issues were identified that would warrant the preparation of an EIR. The commenter has not provided any substantial evidence to demonstrate that an EIR would identify different conclusions than the Draft IS/MND. If an EIR were to be prepared for the proposed project, it would identify the same information and reach the same conclusions as the Draft IS/MND. No new or worsened environmental impacts would be identified. The City will also ensure that the commenter is added to the project's public interest list.

1-37 The comment serves as an introduction to the attached SWAPE letter and introduces the project; therefore, no further response is required.

1-38 The comment expresses a concern with the Draft IS/MND's analysis of the project's air quality (specifically, health risk) and greenhouse gas emission impacts and states that an EIR should be prepared. This comment serves as an introduction to comments that follow. Please refer to responses 1-38 through 1-49, below.

1-39 The comment states that a cumulative construction and operational health risk assessment should be prepared. The SCAQMD does not have guidance requiring that construction and operational health risk be evaluated together. In addition, based on an email from Michael Krause[1], Planning and Rule Manager with the South Coast Air Quality Management District, who is an expert at another California air district, a project's construction and operational health risks need to be evaluated separately. Thus, the Health Risk Assessment is analyzed in accordance with industry guidance.

1-40 The comment states that a cumulative construction and operational health risk assessment should be prepared. The SCAQMD does not have guidance requiring that construction and operational health risk be evaluated together. In addition, based on an email from Michael Krause[2], Planning and Rule Manager with the South Coast Air Quality Management District, who is an expert at another California air district, a project's construction and operational health risks need to be evaluated separately. Thus,

[1] KRAUSE, M. 2019. "AQMD HRA THRESHOLDS." EMAIL FROM M. KRAUSE (SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT PLANNING AND RULES MANAGER) TO A. POLL (DUDEK). FEBRUARY 27, 2019.

[2] Krause, M. 2019. "AQMD HRA Thresholds." Email from M. Krause (South Coast Air Quality Management District Planning and Rules Manager) to A. Poll (Dudek). February 27, 2019.

the Health Risk Assessment is analyzed in accordance with industry guidance and the commenter's process of the addition of construction and operational impacts compared to the threshold is incorrect.

1-41 The comment restates information in the IS/MND that the proposed project would not exceed 10,000 MT CO_2e/yr. The comment also states the determination that the project would result in less than significant impacts is based on the IS/MND's determination that the proposed project would not conflict with the San Bernardino County Regional GHG Reduction Plan, CARB's Scoping Plan and SCAG's 2020-2045 RTP/SCS does is not correct. The comment serves as an introduction to comments to follow. Refer to Response to Comments 1-42 through 1-44, below.

1-42 The comment attempts to conflate Scoping Plan consistency with how the Project's vehicle miles traveled compares to the supposed 2017 Scoping Plan performance-based SB 375 requirements. First, it is important to understand the intent and purpose of SB 375, which is to determine if a project is eligible for CEQA streamlining. As shown in the SB 375 CEQA Chart published by the Office of Planning and Research (https://opr.ca.gov/docs/SB375-IntroCharts.pdf), a project that does not qualify for SB 375 CEQA provisions simply needs to go through the standard CEQA process to determine its project-specific impacts. As such, even if a project is not consistent with SB 375 and cannot rely on its CEQA streamlining provisions, this does not constitute an inconsistency with the 2017 Scoping Plan. Furthermore, the intent and goal of SB 375 is to provide residential and mixed-use developments in proximity to transit hubs to reduce vehicle miles traveled. It is not necessarily applicable to individual development projects, and instead its purpose is to create a regional blueprint for agencies to follow. As such, the Project is not required to demonstrate consistency with SB 375, and further, the vehicle miles traveled targets identified by the commenter are not applicable or based on any substantial evidence by which the Project is required to comply.

1-43 The comment attempts to consider whether the proposed project meets the specific performance-based goal of SCAG's RTP/SCS and SB 375, including per capita GHG emission targets. The commenter states that the Project would exceed SB 375 per capita emission targets. State CEQA Guidelines Section 15064.4 states that lead agencies have the discretion to determine, in the context of a particular project, whether to: (1) use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. The significance of GHG impacts relating to the Project are based the applicable regulatory plans and policies to reduce GHG emissions, which include CARB's Climate Change Scoping Plan; the SCAG 2020-2045 RTP/SCS; Senate Bill 32 and Executive Order S-3-05 and the San Bernardino County Regional GHG Reduction Plan. The GHG analysis is consistent with the CEQA Guidelines and adequately evaluates GHG impacts as required by CEQA. As discussed in Response Item 1-42, the Project is not required to demonstrate consistency with SB 375, and further, the per capita GHG emission targets identified by the commenter are not applicable or based on any substantial evidence by which the Project is required to comply. As discussed in MND Section 3.8, the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. This impact would be less than significant, and no mitigation is required.

1-44 The comment attempts to consider whether the proposed project meets the specific performance-based goal of SCAG's RTP/SCS and SB 375, including Daily VMT Per Capita targets. State CEQA Guidelines Section 15064.4 states that lead agencies have the discretion to determine, in the context of a particular project, whether to: (1) use a model or methodology to quantify greenhouse gas

emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. The significance of GHG impacts relating to the Project are based the applicable regulatory plans and policies to reduce GHG emissions, which include CARB's Climate Change Scoping Plan; the SCAG 2020-2045 RTP/SCS; Senate Bill 32 and Executive Order S-3-05 and the San Bernardino County Regional GHG Reduction Plan. The GHG analysis is consistent with the CEQA Guidelines and adequately evaluates GHG impacts as required by CEQA. As discussed in Response Item 1-42, the Project is not required to demonstrate consistency with SB 375, and further, the Daily VMT Per Capita targets identified by the commenter are not applicable or based on any substantial evidence by which the Project is required to comply. In addition, as presented in MND Section 3.17, the Project's VMT per SP would be below the City's impact threshold for baseline conditions and below the City's impact threshold for cumulative conditions. Because the Project generated VMT per SP does not exceed the future buildout City of Highland VMT per SP in either the baseline or cumulative conditions, the Project generated VMT impact would be less than significant. As discussed in MND Section 3.8, the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. This impact would be less than significant, and no mitigation is required.

1-45 The comment states that the IS/MND fails to demonstrate consistency with the San Bernardino County Regional GHG Reduction Plan. As explained in MND Section 3.8, the San Bernardino Council of Governments (SBCOG) adopted a Regional GHG Reduction Plan in March 2021 (SBCOG 2021). The GHG Reduction Plan compiled an inventory of GHG emissions and developed reduction measures that could be adopted by the 21 Partnership cities of San Bernardino County. The regional greenhouse gas reduction plan serves as the basis for cities in the County to develop a more detailed community or local level climate action plan. However, the City of Highland has not adopted a local climate action plan. Nonetheless, the project would comply with or not prevent the City from pursuing the relevant GHG reduction measures and regulations outlined in the Regional GHG reduction Plan, including compliance with applicable Title 24 building standards, and compliance with the City's off-road equipment idling ordinance. The Regional GHG Reduction Plan is not a qualified GHG reduction plan under CEQA Guidelines Section 15183.5. Therefore, the discussion on the San Bernardino Council of Governments (SBCOG) Regional GHG Reduction Plan is for informational purposes only and is not determinative of significance.

1-46 Compliance with Title 24 building standards and with the City's off-road equipment idling ordinance are regulatory requirements for the Project and not optional measures that would need to be identified as PDFs. As discussed herein, as demonstrated by the analysis contained within the IS/MND and in response to these comments, the project does not result in a potentially significant impacts therefore mitigation measures are not required.

1-47 The commenter states that their analysis shows that the project would have resulted in potentially significant GHG impacts, which should be mitigated. The comment then provides mitigation measures that could reduce project emissions below a level of significance.

As discussed previously, the Draft IS/MND's air quality and GHG emission analyses are technically sound and based on substantial evidence. After estimating emissions using project-specific data, the proposed project's GHG emissions would be less than significant when compared to thresholds established by SCAQMD. Therefore, the Draft IS/MND's analysis is adequate as provided and GHG impacts would remain unchanged. Section 15126.4(a)(3) of the CEQA Guidelines states that mitigation

measures are not required for effects which are not found to be significant. Therefore, because the project would not result in significant environmental impacts, no further mitigation is required per Section 15126.4(a)(3) of the CEQA Guidelines. As such, the Draft IS/MND is adequate as provided and no revisions are required for the Final IS/MND.

1-48 The comment provides a disclaimer and serves as a conclusion to the comment letter. The comment does not address the adequacy of the analysis in the Draft IS/MND. Because no new environmental issues were identified, no further analysis is necessary. Therefore, no revisions are required for the Final IS/MND, and no further response is provided.

1-49 This comment consists of a table estimating the project's GHG emissions with calculations performed by the commenter. These calculations supplement comments provided in Comments 1-42 through 1-44. Please refer to Responses to Comments 1-42 through 1-44 in which it is discussed that the Draft IS/MND's estimation of project emissions is adequate as provided. No further response is necessary.

Response to Comment Letter 2

Carl Bruce Shaffer, MEP, Airport Supervisor
City of Redlands, Facilities and Community Services
December 3, 2021

2-1 This email comments on two separate, independent projects. This comment refers to another project that is not the 6th Street and Victoria Avenue Warehouse project and no response is necessary.

2-2 The comment states that the project is outside the areas of concern for the Redlands Municipal Airport and includes a map showing the project's location in relation to the areas of concern mentioned. No response is necessary.

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3 Errata

The following provides minor revisions, corrections, and additions to the Draft IS/MND. The corrections and additions are organized by section and page number of the Draft IS/MND. New text additions are shown in underline format, and deletions are shown in ~~strikeout~~ format. These minor revisions, corrections, and additions do not change the significance determinations made or the severity of potential environmental impacts evaluated in the Draft IS/MND.

Appendix H – VMT Memorandum

As discussed in Response to Comment 1-32, the Draft IS/MND's VMT analysis was based on a VMT Memorandum prepared by Urban Crossroads in October 2021. This report was initially intended to be included as an appendix to the Draft IS/MND but was inadvertently switched with other non-related materials. This has been corrected and the correct document is included as Appendix B of this Final IS/MND.

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4 References

14 CCR 15000–15387 and Appendices A through L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

SBCOG (San Bernardino Council of Governments). 2021. San Bernardino County Regional Greenhouse Gas Reduction Plan. February 2021. https://www.gosbcta.com/wp-content/uploads/2019/09/San-Bernardino-County-Regional-GHG-Reduction-Plan_Main-Text_Feb-2021.pdf

OEHHA (Office of Environmental Health Hazard Assessment). 2018. CalEnviroScreen 3.0. Updated June 2018. Accessed November 2021. https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30.

CAPCOA (California Air Pollution Control Officers Association). 2017. California Emissions Estimator Model (CalEEMod) User's Guide Version 2016.3.2. Prepared by BREEZE Software, A Division of Trinity Consultants in collaboration with South Coast Air Quality Management District and the California Air Districts. Accessed May 2018. http://caleemod.com/.

SBIAA (San Bernardino International Airport Authority). 2010. Airport Layout Plan Narrative Report for the San Bernardino International Airport. November 2021. http://www.sbiaa.org/wp-content/uploads/2015/10/ALP-Narrative-Report-Complete.pdf

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Appendix A
Comment Letters

Comment Letter 1

BLUM COLLINS & HO, LLP
ATTORNEYS AT LAW
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707 WILSHIRE BLVD., SUITE 4880
LOS ANGELES, CALIFORNIA 90017
(213) 572-0400

December 9, 2021

Kim Stater, Assistant Community Development Director
City of Highland, Community Development Department
27215 Base Line
Highland, California 92346

VIA EMAIL TO:
kstater@cityofhighland.org

Subject: Comments on 6th Street and Victoria Avenue Warehouse Project MND (SCH NO. 2021110112)

Dear Ms. Stater:

Thank you for the opportunity to comment on the Mitigated Negative Declaration (MND) for the proposed 6th Street and Victoria Avenue Warehouse Project. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance (GSEJA). Also, GSEJA formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877. 1-1

1.0 Summary

The project proposes to remove three existing onsite residential structures and construct one approximately 305,617-square-foot (gross area, inclusive of mezzanine/office spaces), one-story warehouse building on an approximately 12.3 gross acre site. The proposed building would be composed of approximately 295,617 square feet of warehouse space and 10,000 square feet of mezzanine/office space. The project includes 30 truck/trailer dock doors, 50 truck/trailer parking spaces, and approximately 129 passenger car parking spaces. 1-2

3.3 Air Quality, 3.6 Energy, and 3.6 Greenhouse Gas Emissions

Please refer to attachments from SWAPE for a complete technical commentary and analysis. 1-3

The MND does not include for analysis relevant environmental justice issues in reviewing potential impacts, including cumulative impacts generated by the proposed project. This is especially significant as the surrounding community is highly burdened by pollution. According to CalEnviroScreen 4.0[1], CalEPA s screening tool that ranks each census tract in the state for pollution and socioeconomic vulnerability, the proposed project s census tract (6071007601) ranks worse than 82% of the rest of the state overall. The surrounding community, including sensitive receptors such as the residences to the north, east, south and west, and Cypress Elementary to the east, bears the impact of multiple sources of pollution and is more polluted than average on every pollution indicator measured by CalEnviroScreen. For example, the project census tract ranks in the 100th percentile for ozone burden and the 57th percentile for PM 2.5 burden, which is typically attributed to heavy truck activity in the area. The census tract also experiences more impacts from cleanup sites than 71% of the state and more drinking water impacts than 85% of the state.

1-3 Cont.

Further, the project s census tract is a diverse community including 67% Hispanic, 12% African-American, and 7% Asian-American residents, which are especially vulnerable to the impacts of pollution. The community has a high rate of linguistic isolation, meaning 83% of households speak little to no English. The community has a high rate of low educational attainment, meaning 92% of the census tract over age 25 has not attained a high school diploma, which is an indication that they may lack health insurance or access to medical care. The community is especially vulnerable as it ranks in the 71st percentile for incidence of asthma and 76th percentile for incidence of cardiovascular disease, which can be attributed to high levels of pollution.

Additionally, the project's census tract is identified as a SB 535 Disadvantaged Community[2], which is not discussed or presented for analysis in the MND.

1-4

3.4 Biological Resources

The MND states that a Biological Resources Assessment was conducted on March 23, 2021. There is no information given about the time of day of the assessment, weather conditions, etc as required by the Department of Fish and Game's 2012 Staff Report on Burrowing Owl Mitigation[3] (2012 Report). Additionally, the timing and number of field investigations were not conducted in accordance with the 2012 Report. The 2012 Report concludes that "current scientific literature

1-5

[1] CalEnviroScreen 4.0 https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40
[2] OEHHA SB 535 Census Tracts https://oehha.ca.gov/calenviroscreen/sb535
[3] Department of Fish and Game 2012 Staff Report on Burrowing Owl Mitigation https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843

indicates that it is most effective to conduct breeding and non-breeding season surveys and report in the manner that follows:

Breeding Season Surveys

Number of visits and timing. Conduct 4 survey visits: 1) at least one site visit between 15 February and 15 April, and 2) a minimum of three survey visits, at least three weeks apart, between 15 April and 15 July, with at least one visit after 15 June."

The field investigations conducted as part of the Biological Resources analysis were not completed at times most effective as noted in the 2012 Report. There were no field surveys conducted between 15 April and 15 July while the 2012 Report lists four total visits (each visit three weeks apart) as most effective. The field survey was not conducted in accordance with the most effective practices outlined by the 2012 Report. An EIR must be prepared which includes focused burrow and burrowing owl surveys conducted in accordance with the most effective practices of the 2012 Report for public review. A site map noting the location, quantity, and size of observed burrows with photos must also be included. This is vital as the City's General Plan includes the following Policy regarding biological assessments:

1-5 Cont.

Conservation and Open Space Element Goal 5.7 - Policy 6) Ensure that required biological assessments are conducted in cooperation with the California Department of Fish and Game and the U.S. Fish and Wildlife Service.

3.9 Hazards and Hazardous Materials

The San Bernardino International Airport and Trade Center (SBIA) is located approximately 0.3 miles south of the project site. The project site is located within the Airport Influence Area (General Plan Figure 6-7) outlined in the City s General Plan. The MND concludes the project will result in less than significant impacts because the project will comply with noise disclosures, the City's Municipal Code noise standards, and FAA regulations for projects taller than 200 feet. However, Figure 8 - Conceptual Elevations depict the proposed building as approximately 45 feet tall and the regulations for projects over 200 feet in height would not apply. The MND has not adequately or accurately analyzed the proposed project in accordance with FAA requirements or the following goals, policies, and actions of the City's General Plan:

1-6

Airport Element Goal 11.1:- Policy 3) Ensure compliance of new development with noise standards in the Code of Federal Regulations and California Airport Noise Regulations.

1-7

Airport Element Goal 11.1:- Policy 4) Ensure adherence to standards in the California Building Code (CBC) that govern acceptable interior noise levels associated with exterior airport noise sources.

1-8

Airport Element Goal 11.2: Reduce the risk to people and property by limiting the type and intensity of development in identified impact areas, ensuring adequate emergency response facilities within or adjacent to airport uses, and requiring adequate public notification of safety policies and procedures. 1-9

Airport Element Goal 11.2:- Policy 1) Evaluate land use compatibility and safety issues in designated Airport Influence Areas (AIAs) by: Coordinated planning with regional planning authorities; Compliance with applicable Airport Master Plans, Federal Aviation Administration (FAA) requirements and the California Airport Land Use Planning Handbook. 1-10

Airport Element Goal 11.2:- Policy 2) Limit the type and intensity of development in designated Airport Influence Areas (AIAs). 1-11

Airport Element Goal 11.2:- Policy 3) Avoid siting sensitive uses, especially residences, schools and hospitals, nearby airport runways or along approved flight paths. 1-12

Airport Element Goal 11.2:- Policy 4) Encourage the development of open space areas in Highland adjacent to designated airport safety zones. 1-13

Airport Element Goal 11.2:- Action 1) Establish occupancy requirements (i.e., noise mitigation and height restrictions) within established airport easement or overflight areas as a condition of approval for new development. 1-14

Airport Element Goal 11.3 - Policy 3) Provide adequate transitions and/or buffers between existing residential neighborhoods and industrial and other incompatible land uses. 1-15

An EIR must be prepared which demonstrates compliance with the General Plan requirements, particularly Airport Element Goal 11.2:- Policy 1 to comply with Federal Aviation Administration (FAA) requirements and the California Airport Land Use Planning Handbook and Airport Element Goal 11.2:- Policy 2 to limit the intensity of development in AIAs because the proposed project exceeds the allowable General Plan intensity of 0.45 FAR as noted below in the Land Use and Planning discussion. 1-16

3.11 Land Use and Planning

The project site's General Plan Land Use designation of Business Park (BP) is listed as a Commercial land use within the City's General Plan[4]. The BP designation in the General Plan permits a maximum intensity of 0.45 floor area ratio (FAR). The project proposes a 0.57 FAR, which exceeds the maximum intensity of the General Plan. The MND does not provide this information for analysis. An EIR must be prepared which analyzes the inconsistency between the 1-17

[4] Highland General Plan Land Use Element
https://www.cityofhighland.org/DocumentCenter/View/154/Land-Use-Element-PDF

proposed project and the maximum FAR permitted by the General Plan, which also sets maximum buildout assumptions as determined by FAR and square footage. Notably, Table 2.2 - Nonresidential Buildout Estimates of the Land Use Element assumes a probable intensity of 0.30 FAR, which is nearly half of the proposed project's FAR. 1-17 Cont.

The MND does not provide a consistency analysis for any applicable General Plan goals, policies, and programs. The MND is inadequate as an informational document and an EIR must be prepared with a consistency analysis with all General Plan goals, policies, and actions, including the following: 1-18

Land Use Goal 2.6 - Policy 1: Require that new development be at an appropriate density or intensity based upon compatibility with surrounding existing and planned land uses. 1-19

Airport Element Goal 11.1:- Policy 3) Ensure compliance of new development with noise standards in the Code of Federal Regulations and California Airport Noise Regulations.

Airport Element Goal 11.1:- Policy 4) Ensure adherence to standards in the California Building Code (CBC) that govern acceptable interior noise levels associated with exterior airport noise sources.

Airport Element Goal 11.2: Reduce the risk to people and property by limiting the type and intensity of development in identified impact areas, ensuring adequate emergency response facilities within or adjacent to airport uses, and requiring adequate public notification of safety policies and procedures.

Airport Element Goal 11.2:- Policy 1) Evaluate land use compatibility and safety issues in designated Airport Influence Areas (AIAs) by: Coordinated planning with regional planning authorities; Compliance with applicable Airport Master Plans, Federal Aviation Administration (FAA) requirements and the California Airport Land Use Planning Handbook. 1-20

Airport Element Goal 11.2:- Policy 2) Limit the type and intensity of development in designated Airport Influence Areas (AIAs).

Airport Element Goal 11.2:- Policy 3) Avoid siting sensitive uses, especially residences, schools and hospitals, nearby airport runways or along approved flight paths.

Airport Element Goal 11.2:- Policy 4) Encourage the development of open space areas in Highland adjacent to designated airport safety zones.

Airport Element Goal 11.2:- Action 1) Establish occupancy requirements (i.e., noise mitigation and height restrictions) within established airport easement or overflight areas as a condition of approval for new development.

Airport Element Goal 11.3 - Policy 3) Provide adequate transitions and/or buffers between existing residential neighborhoods and industrial and other incompatible land uses. 1-20 Cont.

Public Health & Safety Element Goal 6.7 - Policy 1) Require the review of all new development in proximity to the San Bernardino International Airport for compliance with Federal Aviation Administration (FAA) requirements and the California Airport Land Use Planning Handbook with adopted plans. 1-21

Public Health & Safety Element Goal 6.7 - Policy 2) Evaluate the compatibility of airport uses, activities, and operations with all new development in proximity to the San Bernardino International Airport prior to approval and protect sensitive uses, such as residences, schools, hospitals, and libraries from overflight areas. 1-22

Conservation and Open Space Element Goal 5.7 - Policy 6) Ensure that required biological assessments are conducted in cooperation with the California Department of Fish and Game and the U.S. Fish and Wildlife Service. 1-23

Circulation Element Goal 3.1 - Policy 7) Monitor the intensity of land use to keep traffic on any arterial in balance with roadway capacity. 1-24

Circulation Element Goal 3.1 - Policy 8) Require development proposals with the potential to generate traffic volumes or other impacts not adequately evaluated in the Circulation Element and the General Plan Program EIR to prepare a traffic analysis consistent and compatible with the City s Master General Plan Traffic Model. 1-25

Circulation Element Goal 3.1 - Policy 9) Restrict the number of access points and intersections along arterials to preserve mid block and intersection capacities and to maintain public safety. 1-26

The MND does not provide any consistency analysis with SCAG's 2020-2045 Connect SoCal RTP/SCS. Due to errors in modeling and modeling without supporting evidence, as noted throughout this comment letter and attachments, the proposed project has significant potential for inconsistency with Goal 5 to reduce greenhouse gas emissions and improve air quality, Goal 6 to support healthy and equitable communities, and Goal 7 to adapt to a changing climate. An EIR must be prepared to include revised, accurate modeling and a consistency analysis with all goals of the RTP/SCS. 1-27

3.14 Population and Housing

The MND utilizes uncertain language to describe construction employment generation and does not provide any calculation of construction employees. The MND states that a "temporary construction workforce" is needed to construct the project and "these short-term positions are *anticipated* to be filled *primarily* by workers who reside in the *project area vicinity*." However, 1-28

the MND does not provide a CEQA exemption for "short-term" employees, does not define the boundaries of the "project area vicinity," or demonstrate that the project will not need any workers from outside the "vicinity." Relying upon the workforce of the greater SCAG region will increase VMT and air quality/greenhouse gas emissions, and a project EIR must be prepared to reflect this. An EIR must also include information and analysis regarding the number of construction jobs generated by the project and their potential to relocate to the City.

1-28 Cont.

The MND utilizes SCAG's 2001 Employment Density Study to calculate that the proposed project will generate approximately 256 employees. However, newer and more accurate employee estimates are provided by the City's 2012 General Plan Land Use Element. Table 2.2 - Nonresidential Buildout Estimates of the Land Use Element states that the Business Park Land Use designation will generate 1 employee for every 600 square feet of building area. Application of this ratio results in the following calculation:

1-29

305,617 sf building / 600 = 510 employees

The MND discusses SCAG's Connect SoCal RTP/SCS employment and population projections and potential impacts. However, the MND utilizes uncertain and misleading language that project employment generation is "minimal," which does not provide any meaningful analysis of the project s population and employment generation. SCAG's Connect SoCal Demographics and Growth Forecast[5] notes that Highland will add 4,200 jobs between 2016 - 2045. Utilizing the most updated methodology from the City's General Plan buildout calculation of 510 employees, the project represents 12% of Highland's employment growth from 2016 - 2045. SCAG's Growth Forecast notes that Highland s population will increase by 14,700 residents between 2016 - 2045. Utilizing the correctly applied methodology from the City s General Plan buildout calculation of 510 employees, the project represents 3.5% of Highland s population growth from 2016 - 2045. A single project accounting for 12% of the projected employment and 3.5% of population growth within Highland over 29 years represents a significant amount of growth. An EIR must be prepared to include this analysis, and also provide a cumulative analysis discussion of projects approved since 2016 and projects "in the pipeline" to determine if the project will exceed SCAG's employment and/or population growth forecast. Additionally, the EIR must provide demographic and geographic information on the location of qualified workers to fill these positions in order to provide an accurate environmental analysis.

1-30

3.17 Transportation

1-31

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

The MND utilizes uncertain and misleading language to conclude the project will have less than significant Transportation impacts. The MND states that "based on the project s trip generation estimates as described above, development of the proposed project would *likely* not result in degradation of the nearest intersections of Grape Street/6th Street, Victoria Avenue/6th Street, or other nearby intersections due to the low volume of vehicular traffic." Further, the MND states that "the scoping of a focused Traffic Report is in progress with the City and is subject to review and approval by the City prior to project approval. By proceeding with scoping of a Traffic Report, the project complies with and would not conflict with the City s Traffic Study Guidelines. Therefore, impacts would be less than significant." Delaying preparation and review of a Traffic Report in compliance with the City's Traffic Study Guidelines does not comply with CEQA's requirements for meaningful disclosure and implements the project without CEQA review. This is also deferred mitigation and does not comply with CEQA s requirements for meaningful disclosure as the Traffic Report will determine consistency or inconsistency with the City s General Plan policies and goals. An EIR must be prepared which includes the Traffic Report for public review and comment.

1-31 Cont.

1-32

The VMT analysis utilized the "San Bernardino County Transportation Authority (SBCTA) Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (SBCTA Guidelines), per direction from the City in lieu of formally adopted City VMT guidelines." The SBCTA Guidelines are not included for public review, which does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). Incorporation by reference (CEQA § 15150 (f)) is not appropriate as the SBCTA Guidelines contribute directly to analysis of the problem at hand. An EIR must be prepared to include the SBCTA Guidelines for review, analysis, and comment by the public and decision makers.

1-33

The MND calculates the VMT per service population to be below City VMT levels, even though the project exceeds the allowable FAR intensity. The MND concludes the project will have less than significant VMT impacts. The calculations provided in the MND are not supported by any meaningful evidence in Appendix H - Traffic Impact Analysis. Appendix H downloaded from the City's website only includes eight pages that are all regarding the LOS analysis. Appendix H does not include any VMT information or analysis. A project EIR must be prepared and circulated for public review to include the complete version of Appendix H in order to be an adequate informational document.

1-34

Further, the operational nature of industrial/warehouse uses involves high rates of truck/trailer VMT due to traveling from large regional distribution centers to smaller industrial parks (such as the proposed project) and then to their final delivery destinations. Appendix A - Air Quality calculates that the project's annual VMT is 2,146,200 for trucks and 2,350,892 for employees.

1-35

This is a combined total of 4,497,092 annual VMT generated by the project, which results in an average of 12,320 VMT per day. The project's truck/trailer activity is unable to utilize public transit or bicycles and it is misleading to the public and decision makers to exclude this portion of the VMT generated by project operations. An EIR must be prepared which reflects a quantified project-based VMT analysis regarding the potentially significant project transportation impacts.

1-35 Cont.

Conclusion

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

1-36

Sincerely,

Gary Ho
Blum Collins & Ho, LLP

Attachments:
1. SWAPE Comment Letter

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

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December 9, 2021

Gary Ho
Blum Collins LLP
707 Wilshire Blvd, Ste. 4880
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Subject: Comments on the 6th Street & Victoria Ave Warehouse Project (SCH No. 2021110112)

Dear Mr. Ho,

We have reviewed the November 2021 Initial Study/Mitigated Negative Declaration ("IS/MND") for the 6th Street & Victoria Ave Warehouse Project ("Project") located in the City of Highland ("City"). The Project proposes to construct a 305,617-SF warehouse and 159 parking spaces on the 12.3-acre site. 1-37

Our review concludes that the IS/MND fails to adequately evaluate the Project's health risk and greenhouse gas impacts. As a result, emissions and health risk impacts associated with construction and operation of the proposed Project are underestimated and inadequately addressed. An Environmental Impact Report ("EIR") should be prepared to adequately assess and mitigate the potential health risk and greenhouse gas impacts that the project may have on the surrounding environment. 1-38

Air Quality

Diesel Particulate Matter Health Risk Emissions Inadequately Evaluated

The IS/MND concludes that the proposed Project would result in a less-than-significant health risk impact based on quantified construction and operational health risk assessments ("HRA(s)") (p. 31-36). Specifically, the IS/MND estimates that the maximum individual cancer risk posed to nearby, existing sensitive receptors as a result of Project construction and operation would be 6.50- and 9.59-in one million, respectively (see excerpts below) (p. 33, Table 12; p. 36, Table 14). 1-39

Table 12. Construction Health Risk Assessment Results – Mitigated

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk–Residential	Per Million	6.50	10	Less than significant
Chronic Hazard Index–Residential	Index Value	0.024	1.0	Less than Significant

Table 14. Operational Health Risk Assessment Results

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk–Residential	Per Million	9.59	10	Less than Significant
Chronic Hazard Index–Residential	Index Value	0.003	1.0	Less than Significant

However, the IS/MND's evaluation of the Project's potential health risk impacts, as well as the subsequent less-than-significant impact conclusion, is incorrect. The State of California Department of Justice recommends the preparation of a quantitative HRA pursuant to the Office of Environmental Health Hazard Assessment ("OEHHA"), the organization responsible for providing guidance on conducting HRAs in California, as well as local air district guidelines. [1] OEHHA released its most recent *Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments* in February 2015. According to OEHHA guidance, "the excess cancer risk is calculated separately for each age grouping and then summed to yield cancer risk at the receptor location." [2] However, while the IS/MND includes two HRAs evaluating the health risk impacts to nearby, existing receptors as a result of Project construction and operation, the HRA fails to evaluate the cumulative lifetime cancer risk to nearby, existing receptors as a result of Project construction and operation together. Thus, the IS/MND's HRA fails to sum each age bin to evaluate the total cancer risk over the course of the Project's total construction and operation. This is incorrect and, as such, an updated analysis should quantify the entirety of the Project's construction and operational health risks and then sum them to compare to the SCAQMD threshold of 10 in one million, as referenced by the IS/MND (p. 32). [3]

1-39 Cont.

Failure to Identify a Potentially Significant Health Risk Impact

As previously described, the IS/MND estimates that the maximum individual cancer risk posed to nearby, existing sensitive receptors as a result of Project construction and operation would be 6.5 and 9.59 in one million, respectively, neither of which individually exceed the SCAQMD significance threshold of 10 in one million (p. 33, Table 12; p. 36, Table 14). However, as previously discussed, the IS/MND should have evaluated the *cumulative* construction-related and operational cancer risk resulting

1-40

[1] "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." State of California Department of Justice, *available at:* https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf, p. 6.
[2] "Guidance Manual for preparation of Health Risk Assessments." OEHHA, February 2015, *available at:* https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf p. 8-4
[3] "South Coast AQMD Air Quality Significance Thresholds." SCAQMD, April 2019, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf.

from the Project. In order to correctly evaluate the Project's health risk impact, we summed the IS/MND's construction-related and operational cancer risk estimates and found that the resulting cancer risk exceeds the SCAQMD threshold of 10 in one million (see table below).

IS/MND Cumulative Cancer Risk

HRA	Cancer Risk (in one million)
Construction	6.5
Mobile-Source Operation	9.59
Total	**16.09**
SCAQMD Threshold	10
Exceed?	***Yes***

As demonstrated in the table above, the resulting cumulative cancer risk estimate exceeds the SCAQMD threshold of 10 in one million. Thus, the Project poses a potentially significant health risk to nearby existing sensitive receptors, which was not previously identified or addressed by the IS/MND. As such, the IS/MND is required under CEQA to implement all feasible mitigation to reduce impacts to a less-than-significant level. According to CEQA Guidelines § 15096(g)(2):

> "When an EIR has been prepared for a project, the Responsible Agency shall not approve the project as proposed if the agency finds any feasible alternative or feasible mitigation measures within its powers that would substantially lessen or avoid any significant effect the project would have on the environment."

As you can see, the proposed Project should not be approved until all feasible mitigation has been considered and incorporated where feasible, such as those suggested in the section of this letter titled "Feasible Mitigation Measures Available to Reduce Emissions." As such, the IS/MND fails to identify and adequately mitigate the Project's potentially significant health risk impact, and the less-than-significant impact conclusion should not be relied upon.

1-40 Cont.

Greenhouse Gas

Failure to Adequately Evaluate Greenhouse Gas Impacts

The IS/MND estimates that the Project would generate net annual greenhouse gas ("GHG") emissions of 4,964.34 metric tons of carbon dioxide equivalents per year ("MT CO_2e/year"), which does not exceed the SCAQMD recommended threshold of 10,000 MT CO_2e/year (see excerpt below) (p. 65-66, Table 19).

1-41

Table 19. Estimated Annual Operational Greenhouse Gas Emissions

Emission Source	CO_2	CH_4	N_2O	CO_2e
	metric tons per year			
Water supply and wastewater	236.69	2.33	0.06	311.75
Off-road equipment (Diesel Forklifts)	366.62	0.12	0.00	369.58
Off-road equipment (Electric Forklifts)	71.19	<0.01	<0.01	71.52
			Project Total	4,950.28
			Amortized Construction Emissions	*14.06*
			Operation + Amortized Construction Total	4,964.34

Source: Appendix A-1.
Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent.

1-41 Cont.

Furthermore, the IS/MND relies upon the Project's consistency with the San Bernardino County Regional GHG Reduction Plan, CARB's *Scoping Plan*, and SCAG's 2020-2045 *RTP/SCS* to conclude that the Project would result in a less-than-significant GHG impact (p. 66-67). However, the IS/MND's analysis, as well as the subsequent less-than-significant impact conclusion, is incorrect for three reasons.

(1) The IS/MND fails to consider the performance-based standards under CARB's *Scoping Plan*;
(2) The IS/MND fails to consider the performance-based standards under SCAG's *RTP/SCS*; and
(3) The IS/MND fails to demonstrate the Project's consistency with the San Bernardino County Regional GHG Reduction Plan.

1) Failure to Consider Performance-based Standards Under CARB's Scoping Plan

As previously discussed, the IS/MND concludes that the Project would be consistent with CARB's 2017 *Scoping Plan* (p. 67). However, this is incorrect, as the IS/MND fails to consider the performance-based measures proposed by CARB.

i. Passenger & Light Duty VMT Per Capita Benchmarks per SB 375

In reaching the State's long-term GHG emission reduction goals, CARB's 2017 *Scoping Plan* explicitly cites to SB 375 and the VMT reductions anticipated under the implementation of Sustainable Community Strategies.[4] CARB has identified the population and daily VMT from passenger autos and light-duty vehicles at the state and county level for each year between 2010 to 2050 under a "baseline scenario" that includes "current projections of VMT included in the existing Regional Transportation Plans/Sustainable Communities Strategies (RTP/SCSs) adopted by the State's 18 Metropolitan Planning Organizations (MPOs) pursuant to SB 375 as of 2015."[5] By dividing the projected daily VMT by the

1-42

[4] "California's 2017 Climate Change Scoping Plan." CARB, November 2017, *available at*: https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf, p. 25, 98, 101-103.
[5] "Supporting Calculations for 2017 Scoping Plan-Identified VMT Reductions," Excel Sheet "Readme." CARB, January 2019, *available at*: https://ww2.arb.ca.gov/sites/default/files/2019-01/sp_mss_vmt_calculations_jan19_0.xlsx.

population, we calculated the daily VMT per capita for each year at the state level for 2010 (baseline year), 2023 (Project operational year), and 2030 (target years under SB 32) (see table below).

2017 Scoping Plan Daily VMT Per Capita			
State			
Year	Population	LDV VMT Baseline	VMT Per Capita
2010	37,335,085	836,463,980.46	22.40
2023	41,659,526	924,184,228.61	22.18
2030	43,939,250	957,178,153.19	21.78

The below table compares the 2017 *Scoping Plan* daily VMT per capita values against the daily VMT per capita values for the Project based on the IS/MND's estimates.[6]

Daily VMT Per Capita from Passenger & Light-Duty Trucks, Exceedances under 2017 Scoping Plan Performance-Based SB 375 Benchmarks	
Sources	**IS/MND**
Annual VMT from Auto & Light-Duty Vehicles	2,350,892
Daily VMT from Auto & Light-Duty Vehicles	6,441
Service Population	257
Daily VMT Per Capita	**25.06**
22.4 VMT (State 2010 Baseline) **Exceeded?**	**Yes**
22.18 VMT (State 2023 Projected) **Exceeded?**	**Yes**
21.78 VMT (State 2030 Projected) **Exceeded?**	**Yes**

As shown above, the IS/MND's estimates show that the Project exceeds the CARB 2017 *Scoping Plan* State-specific projections for 2010, 2023, and 2030. Because the IS/MND exceeds the CARB 2017 *Scoping Plan* performance-based daily VMT per capita projection, the Project conflicts with the CARB 2017 *Scoping Plan* and SB 375. As such, the IS/MND's claim that the proposed Project would not conflict with the CARB 2017 *Scoping Plan* is unsupported. An EIR should be prepared for the proposed Project to provide additional information and analysis to conclude less-than-significant GHG impacts.

1-42 Cont.

2) Failure to Consider Performance-based Standards under SCAG's RTP/SCS

As previously discussed, the IS/MND concludes that the Project would be consistent with SCAG's *RTP/SCS* (p. 66-67). However, this is incorrect, as the IS/MND fails to consider the specific performance-based goals underlying SCAG's *RTP/SCS*, such as: i) per capita GHG emission targets, or ii) daily vehicles miles traveled ("VMT") per capita benchmarks.

1-43

[6] See Attachment A for calculations.

i. SB 375 Per Capita GHG Emission Goals

SB 375 was signed into law in September 2008 to enhance the state's ability to reach AB 32 goals by directing CARB to develop regional 2020 and 2035 GHG emission reduction targets for passenger vehicles (autos and light-duty trucks). In March 2018, CARB adopted updated regional targets requiring a 19 percent decrease in VMT for the SCAG region by 2035. This goal is reflected in SCAG's 2020 RTP/SCS Program Environmental Impact Report ("PEIR"), in which the 2020 RTP/SCS PEIR updates the per capita emissions to 18.8 lbs/day in 2035 (see excerpt below). [7]

Table 3.8-10
SB 375 Analysis

	2005 (Baseline)	2020 (Plan)	2035 (Plan)
Resident population (per 1,000)	17,161	19,194	21,110
CO2 emissions (per 1,000 tons)	204.0[a]	204.5[b]	198.6[b]
Per capita emissions (pounds/day)	23.8	21.3	18.8
% difference from Plan (2020) to Baseline (2005)			-8%
% difference from Plan (2035) to Baseline (2005)			-19%[c]

Note:
[a] Based on EMFAC2007
[b]Based on EMFAC2014 and SCAG modeling, 2019.
[c] Includes off-model adjustments for 2035 and 2045
Source: SCAG modeling, 2019.
http://www.scag.ca.gov/committees/CommitteeDocLibrary/jointRCPC110515fullagn.pdf

In order to evaluate consistency with this SB 375 objective and SCAG's *RTP/SCS* performance-based goals, SWAPE calculated the Project's per-capita CO_2 emissions from passenger and light duty vehicles.[8] First, total annual GHG mobile emissions were multiplied by the percentage of auto and light-duty truck fleet mix, then converted into total pounds per day, then divided by the estimated service population of 257. The below table shows the per capita emissions for the Project based on the IS/MND's modeling (see table below).

1-43 Cont.

[7] "Connect SoCal Certified Final Program Environmental Impact Report." SCAG, May 2020, *available at*: https://scag.ca.gov/sites/main/files/file-attachments/fpeir_connectsocal_complete.pdf?1607981618, p. 3.8-74.
[8] See Attachment A for calculations.

CO_2e Per Capita Emissions from Passenger & Light-Duty Trucks, Exceedances under RTP/SCS Performance-Based SB 375 Goals

Sources	IS/MND
Annual Mobile Emissions (MT CO_2e/year)	3,848.70
Passenger & Light-Duty Fleet Mix (%)	72.00%
Daily CO_2e Emissions (lbs/day)	16,737.40
Service Population	257
Per Capita Emissions (lbs/day/SP)	**65.13**
21.3 lbs/day/SP (2020 Goal) **Exceeds?**	**Yes**
18.8 lbs/day/SP (2035 Goal) **Exceeds?**	**Yes**

As shown in the above table, when utilizing the IS/MND's modeling, the Project would result in 65.13 pounds per day per service population ("lbs/day/SP") emissions. This exceeds both SCAG's 2020 and 2035 targets of 21.3- and 18.8-lbs/day/SP, respectively, indicating that the Project is inconsistent with SB 375 and SCAG's *RTP/SCS*.

1-43 Cont.

ii. SB 375 RTP/SCS Daily VMT Per Capita Target

Under the SCAG's 2020 *RTP/SCS*, daily VMT per capita in San Bernadino County should decrease from 26.1 to 24.5 VMT during that same period.[9] However, the IS/MND fails to consider this performance-based VMT target. In order to evaluate consistency with the *RTP/SCS*'s performance-based VMT reduction target, daily VMT from passenger automobile and light-duty vehicle was calculated based on the Project's provided daily VMT estimates and the CalEEMod default fleet mix, then divided by the estimated service population of 257. The below table shows the daily VMT per capita for the Project based on the IS/MND's estimates.[10]

1-44

[9] "Connect SoCal." SCAG, September 2020, *available at*: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176, pp. 138.
[10] See Attachment A for calculations.

Daily VMT Per Capita from Passenger & Light-Duty Trucks, Exceedances under RTP/SCS Performance-Based SB 375 Target

Sources	IS/MND
Annual VMT from Auto & Light-Duty Vehicles	2,350,892
Daily VMT from Auto & Light-Duty Vehicles	6,441
Service Population	257
Daily VMT Per Capita	25.06
23.2 VMT (SCAG-Wide 2016 Baseline) **Exceeded?**	Yes
20.7 VMT (SCAG-Wide 2045 Target) **Exceeded?**	Yes
24.5 VMT (San Bernadino 2045 Target) **Exceeded?**	Yes

1-44 Cont.

As shown in the above table, based on a service population of 257, the Project would result in 25.06 VMT per capita from passenger auto and light-duty truck vehicles. This exceeds the above-mentioned SCAG-wide and San Bernadino County-specific benchmarks and targets under SCAG's 2020 *RTP/SCS*. Thus, based on the modeling provided in the IS/MND, the Project would exceed the 2016 baseline and 2045 target VMT per capita values for the SCAG region as a whole, as well as the 2045 target VMT per capita values for San Bernadino County, indicating that the Project conflicts with the SCAG's *RTP/SCS* and SB 375.

3) Failure to Demonstrate Consistency with the San Bernardino County Regional GHG Reduction Plan

As previously discussed, the IS/MND relies upon the Project's consistency with the San Bernardino Council of Government's ("SBCOG") GHG Reduction Plan to determine Project GHG significance (p. 66-67). Specifically, the IS/MND states:

> "The project would comply with or not prevent the City from pursuing the relevant GHG reduction measures and regulations outlined in the Regional GHG reduction Plan, including compliance with applicable Title 24 building standards, and compliance with the City's off-road equipment idling ordinance" (p. 66).

1-45

However, the IS/MND's claim that the Project is consistent with the City's GHG Reduction Plan is unsupported for two reasons.

First, the IS/MND fails to consider all of the GHG reduction strategies in the City's GHG Reduction Plan. Specifically, the Reduction Plan includes measures regarding building energy, on-road transportation, off-road transportation, waste, agriculture, wastewater, and GHG performance standards for new

1-46

developments.[11] As such, we cannot verify that the Project is consistent with all aspects of the City's GHG Reduction Plan.

1-46 Cont.

Second, simply stating that Project would comply with applicable Title 24 building standards and with the City's off-road equipment idling ordinance does not guarantee that the Project will be consistent with the City's GHG Reduction Plan. Without including such project design features ("PDFs") as formal mitigation measures, we cannot guarantee that they would be implemented, monitored, and enforced on the Project site. As such, in order to be consistent with the City's GHG Reduction Plan, we recommend the Project include all PDF's as formal mitigation measures. Until then, the IS/MND's conclusion that the project would be consistent with the City's GHG Reduction Plan is unsubstantiated (p. 50). Therefore, the Project's GHG analysis is insufficient and the IS/MND's less-than-significant impact conclusion should not be relied upon.

1-47

Feasible Mitigation Measures Available to Reduce Emissions

Our analysis demonstrates that the Project would result in potentially significant health risk impact that should be mitigated further. In an effort to reduce the Project's emissions, we identified several mitigation measures that are applicable to the proposed Project. Feasible mitigation measures can be found in the Department of Justice Warehouse Project Best Practices document.[12] Therefore, to reduce the Project's emissions, consideration of the following measures should be made:

- Requiring off-road construction equipment to be zero-emission, where available, and all diesel-fueled off-road construction equipment, to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.
- Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.
- Requiring on-road heavy-duty haul trucks to be model year 2010 or newer if diesel-fueled.
- Providing electrical hook ups to the power grid, rather than use of diesel-fueled generators, for electric construction tools, such as saws, drills and compressors, and using electric tools whenever feasible.
- Limiting the amount of daily grading disturbance area.
- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.
- Forbidding idling of heavy equipment for more than two minutes.
- Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.

1-48

[11] "San Bernadino County Regional Greenhouse Gas Reduction Plan." *Available at:* https://www.gosbcta.com/wp-content/uploads/2019/09/San_Bernardino_Regional_GHG_Reduction_Plan_Main_Text_Mar_2021.pdf

[12] "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." State of California Department of Justice.

- Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.
- Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.
- Providing information on transit and ridesharing programs and services to construction employees.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.
- Requiring that all facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site meet or exceed 2010 model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators shall maintain records on-site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring all heavy-duty vehicles entering or operated on the project site to be zero-emission beginning in 2030.
- Requiring on-site equipment, such as forklifts and yard trucks, to be electric with the necessary electrical charging stations provided.
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
- Forbidding trucks from idling for more than two minutes and requiring operators to turn off engines when not in use.
- Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the air district, and the building manager.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.
- Constructing electric truck charging stations proportional to the number of dock doors at the project.
- Constructing electric plugs for electric transport refrigeration units at every dock door, if the warehouse use could include refrigeration.
- Constructing electric light-duty vehicle charging stations proportional to the number of parking spaces at the project.

1-48 Cont.

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

1-48 Cont.

These measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently, reduce emissions released during Project construction and operation. An EIR should be prepared to include all feasible mitigation measures, as well as include an updated GHG analysis to ensure that the necessary mitigation measures are implemented to reduce emissions to below thresholds. The EIR should also demonstrate a commitment to the implementation of these measures prior to Project approval, to ensure that the Project's significant emissions are reduced to the maximum extent possible.

Disclaimer

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

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otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

1-49 Cont.

Sincerely,

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

Paul E. Rosenfeld, Ph.D.

Attachment A: CARB and SCAG Calculations
Attachment B: Matt Hagemann CV
Attachment C: Paul E. Rosenfeld CV

Attachment A

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GHG CALCULATIONS: IS/MND Modeling

Line (L)	Value	Unit
		Total Emissions From Passenger and Light Duty Vehicles
1	3,848.70	Annual Mobile Emissions (MT CO2e/year) (p. 65, Table 19)
2	72.00%	Passenger and Light-Duty VMT Fleet Mix (Appendix A-1, pp. 285)
3	2,771.06	Passenger and Light Duty Vehicle Emissions (MT CO2e/year) [Calc: (L1*L2)]
4	16,737.40	Passenger and Light-Duty Vehicle Emissions (lbs CO2e/day) (Calc: (L3 converted into lbs) / (365 days)]
5	257	Service Population [0 residents + 257 employees]
6	65.13	Per Capita Emissions (lbs CO2e/day/SP) [Calc: (L4/L5)]
		Daily VMT Per Capita From Passenger and Light Duty Vehicles
9	2,350,892.00	Annual VMT from Passenger & Light-Duty Vehicles (Appendix A-1, pp. 285)
10	6,440.800	Daily VMT from Passenger & Light-Duty Vehicles [Calc: (L9/365)]
11	257	Service Population [0 residents + 257 employees] (IS/MND p. 95)
12	25.06	Daily VMT Per Capita [(Calc: L10/L11)]

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Education:

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

Professional Certifications:

California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

Professional Experience:

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

Positions Matt has held include:

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

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

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt's responsibilities have included:

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

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

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

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

Executive Director:

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

Hydrogeology:

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

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

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

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

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

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

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

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

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

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

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

Policy:

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

Activities included the following:

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

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

Geology:

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

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

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

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

Teaching:

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

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

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

Invited Testimony, Reports, Papers and Presentations:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Other Experience:

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

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

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Paul Rosenfeld, Ph.D.

Chemical Fate and Transport & Air Dispersion Modeling

Principal Environmental Chemist

Risk Assessment & Remediation Specialist

Education

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

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

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

Professional Experience

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

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

Professional History:

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

Publications:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Presentations:

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

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

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

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

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

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

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

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

Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International*

Conferences on Soils Sediment and Water. Platform lecture conducted from University of Massachusetts, Amherst MA.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Teaching Experience:

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

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

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

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

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

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

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

Academic Grants Awarded:

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

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

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

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

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

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

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

Deposition and/or Trial Testimony:

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

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

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

In the Superior Court of the State of Arizona In and For the Cunty of Maricopa
Mary Tryon et al., Plaintiff vs. The City of Pheonix v. Cox Cactus Farm, L.L.C., Utah Shelter Systems, Inc.
Case Number CV20127-094749
Rosenfeld Deposition: 5-7-2021

In the United States District Court for the Eastern District of Texas Beaumont Division
Robinson, Jeremy et al *Plaintiffs*, vs. CNA Insurance Company et al.
Case Number 1:17-cv-000508
Rosenfeld Deposition: 3-25-2021

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

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

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

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

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

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

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

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

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

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

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

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

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

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., *Plaintiffs,* vs. Meritor Inc., et al., *Defendants*
Case Number: 4:16-cv-52-DMB-JVM
Rosenfeld Deposition: July 2017

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

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

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

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action N0. 14-C-30000
Rosenfeld Deposition, June 2015

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

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case Number CACE07030358 (26)
Rosenfeld Deposition: December 2014

In the County Court of Dallas County Texas
Lisa Parr et al, *Plaintiff*, vs. Aruba et al, *Defendant.*
Case Number cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial: April 2014

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., *Plaintiffs,* vs. Republic Services, Inc., et al., *Defendants*
Case Number: 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition: October 2012

In the United States District Court for the Middle District of Alabama, Northern Division
James K. Benefield, et al., *Plaintiffs*, vs. International Paper Company, *Defendant.*
Civil Action Number 2:09-cv-232-WHA-TFM
Rosenfeld Deposition: July 2010, June 2011

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

In the United States District Court, Western District Lafayette Division
Ackle et al., *Plaintiffs*, vs. Citgo Petroleum Corporation, et al., *Defendants*.
Case Number 2:07CV1052
Rosenfeld Deposition: July 2009

Comment Letter 2

From: Carl Bruce Shaffer
Sent: Friday, December 3, 2021 8:35 AM
To: Brian Foote
Subject: TPM 21-002 and GPA 21-001

1 – The project at the northeast corner of Baseline and Buckeye Street, two (2) drive-thru restaurant buildings is outside areas of concern for Redlands Municipal Airport.

CUP 21-001, DRA 21-001, LLA 21-001, and GPA 21-001

2 - The project at 6th Street and Victoria Avenue, a Warehouse Project outside areas of concern for Redlands Municipal Airport.

CUP 21-007 DRA 21-005, VAR 21-001 TPM 21-002

2-1

Thank you for the opportunity to comment.



2-2

Carl Bruce Shaffer, MEP
Airport Supervisor
Facilities and Community Services
909-557-8520 cell
909-798-7573
cshaffer@cityofredlands.org

Appendix B
VMT Memorandum

October 5, 2021

Mr. Dennis Pascua
Dudek
605 Third Street
Encinitas, CA 92024

SUBJECT: 6TH AND VICTORIA AVENUE VEHICLE MILES TRAVELED (VMT) ANALYSIS

Dear Mr. Dennis Pascua:

The following VMT Analysis has been prepared for the proposed 6th and Victoria Avenue **(Project)**, which is located in the City of Highland.

PROJECT OVERVIEW

The Project is proposed to consist of a 307,445 square foot (SF) warehouse building.

BACKGROUND

Changes to California Environmental Quality Act (CEQA) Guidelines were adopted in December 2018, which require all lead agencies to adopt VMT as a replacement for automobile delay-based level of service (LOS) as the measure for identifying transportation impacts for land use projects. This statewide mandate went into effect July 1, 2020. To aid in this transition, the Governor's Office of Planning and Research (OPR) released a Technical Advisory on Evaluating Transportation Impacts in CEQA (December of 2018) **(Technical Advisory)**. (1) In February 2020, the San Bernardino County Transportation Authority (SBCTA) released the SBCTA Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment **(SBCTA Guidelines)** (2) that address VMT analysis requirements. At the time of this analysis the City of Highland has yet to formally adopted City VMT guidelines and impact thresholds. However, based on consultation with City planning and engineering staff, this analysis has been prepared utilizing recommendations outlined by the SBCTA Guidelines.

PROJECT SCREENING

The SBCTA Guidelines provides information on appropriate screening thresholds that can be used to identify when a proposed land use project is anticipated to result in a less than significant impact without the need to conduct a more detailed project level assessment. The SBCTA recommended screening thresholds are listed below:

- TPA screening
- Low VMT area screening

- Project Type screening

TPA SCREENING

Consistent with guidance identified in the SBCTA Guidelines, projects located within a Transit Priority Area (TPA) (i.e., within ½ mile of an existing "major transit stop"[1] or an existing stop along a "high-quality transit corridor"[2]) may be presumed to have a less than significant impact absent substantial evidence to the contrary. However, the presumption may *not* be appropriate if a project:

- Has a Floor Area Ratio (FAR) of less than 0.75;
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

Based on the Screening Tool results presented in Attachment A, the Project site is not located within ½ mile of an existing major transit stop, or along a high-quality transit corridor.

TPA screening criteria is not met.

LOW VMT AREA SCREENING

As described in the SBCTA Guidelines, "Residential and office projects located within a low VMT-generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary. In addition, other employment-related and mixed-use land use projects may qualify for the use of screening if the project can reasonably be expected to generate VMT per resident, per worker, or per service population that is similar to the existing land uses in the low VMT area."[3]

SBCTA Guidelines states that to appropriately conduct this screening, the analyst is to use the SBCTA VMT Screening Tool (**Screening Tool**). The Screening Tool allows users to input an assessor's parcel number (APN) to determine if a project's location meets one or more of the screening thresholds for land use projects. The Screening Tool uses the sub-regional San Bernardino Transportation Analysis Model (SBTAM) to measure VMT performance within individual traffic analysis zones (TAZ's) within the City. The Project's physical location based on APN(s) is selected in the Screening Tool to determine project generated VMT as compared to the City's recommended impact threshold. The parcel containing the proposed Project was selected and the Screening Tool was run for the VMT per service population

[1] Pub. Resources Code, § 21064.3 ("'Major transit stop' means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.").
[2] Pub. Resources Code, § 21155 ("For purposes of this section, a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.").
[3] SBCTA Guidelines; Page26

(SP) measure of VMT. Based on the Screening Tool results, the Project is located within a low VMT generating zone as compared to the City recommended threshold of better than City of Highland future buildout VMT per SP (See Attachment A). However, the TAZ for which the Project resides does not include any industrial employment and therefore would not be reflective of the Project's proposed land use.

Low VMT Area screening criteria is not met.

PROJECT TYPE SCREENING

SBCTA Guidelines state that local serving retail projects less than 50,000 square feet may be presumed to have a less than significant impact. In addition to local serving retail, other local serving land uses such as public facilities, day care centers, gas stations, etc. would tend to provide local services and result in reducing overall VMT.

Additionally, SBCTA Guidelines identifies that projects that generate fewer than 110 daily trips would not cause a substantial increase in the total citywide or regional VMT and are therefore presumed to have a less than significant impact on VMT. Trips generated by the Project's proposed land uses have been estimated based on trip generation rates collected by the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition, 2017. (3) The proposed Project is anticipated to generate a net total of 535 vehicle trip-ends per day (see Attachment B). The Project is anticipated to generate more than 110 trips per day. Therefore, would not meet the daily vehicle trips screening threshold.

Project Type screening criteria is not met.

As the Project does not meet any of the aforementioned screening criteria a VMT analysis has been prepared.

VMT ANALYSIS

The calculation of VMT for land use projects is based on the total number of trips generated and the average trip length of each vehicle. The San Bernardino Transportation Analysis Model (SBTAM) is a useful tool to estimate VMT as it considers interaction between different land uses based on socio-economic data such as population, households, and employment. The SBCTA Guidelines identifies SBTAM as the appropriate tool for conducting VMT analysis for land use projects in the City of Highland.

Project VMT has been calculated using the most current version of SBTAM. Adjustments in socio-economic data (SED) (i.e., employment) have been made to the appropriate traffic analysis zone (TAZ) within the SBTAM model to reflect the Project's proposed land uses (i.e., warehouse). Table 1 summarizes the employment estimates for the Project. It should be noted that the employment estimates are consistent with the employment density factors identified in the Southern California Association of Governments (SCAG) Employment Density Study. (October 2001) (4)

TABLE 1: EMPLOYMENT ESTIMATES

Land Use	Quantity (SF)	Employment Density Factor[4]	Estimated Employees
Warehouse	307,445	1 employee per 1,195 SF	257

Adjustments to SED to represent the Project were made to both the baseline and cumulative SBTAM traffic models. Each model was then run with the updated employment estimates included.

Consistent with SBCTA Guidelines, Project generated VMT includes vehicle trips that are traced to the project zone or zones. Project generated VMT is extracted from the SBTAM model using the production-attraction (PA) trip matrices. The PA matrices are then multiplied by the final assignment (distance) skims. Project generated baseline VMT was calculated from the baseline travel forecasting model which was also used to establish the City's VMT threshold. Additionally, the project generated VMT was calculated in the cumulative travel forecasting model to estimate VMT in cumulative conditions. Project VMT was then normalized by dividing by the Project's service population (SP) (i.e., estimated number of employees for industrial type uses) for their respective baseline and cumulative conditions. This calculation changes the raw VMT value into an efficiency metric for ease of comparison. As the Project does not contain residential land uses the service population consists entirely of the Project's employment. Project generated VMT was calculated for both the base year model (2016) and cumulative year model (2040) and linear interpolation was used to determine the baseline (2021) project generated VMT. Table 2 presents the key inputs for the calculation of project generated VMT per service population. Resulting in a baseline Project generated VMT per SP of 21.90.

TABLE 2: PROJECT VMT PER SP

	Base year (2016)	Cumulative (2040)	Baseline (2021)
Service Population (SP)	257	257	257
VMT	5,674	5,344	5,605
VMT / SP	22.07	20.87	21.90

PROJECT IMPACT ASSESSMENT

City Staff has identified following recommended threshold for findings of less than significant[5]:

1. The baseline project-generated VMT per service population below future buildout City of Highland VMT per service population, or
2. The cumulative project-generated VMT per service population below future buildout City of

[4] Table II-B of the SCAG Employment Density Study.
[5] Bennett, Matt Email to Alex So. 27 September 2021

Highland VMT per service population.

SBCTA provides VMT calculations for each of its member agencies and for the County of San Bernardino region. Urban Crossroads has obtained this data from SBCTA, which for City of Highland the City's future buildout VMT per SP is 22.51.

Table 3 illustrates the comparison between Project generated VMT per SP to the City's future buildout VMT per SP. As shown, the Project's VMT per SP would be 2.71 percent below the City's impact threshold for baseline condition and 7.29 percent below the City's impact threshold for cumulative conditions. The Project's VMT impact is therefore considered less than significant.

TABLE 3: PROJECT VMT PER SP COMPARISON

	Baseline 2021	Cumulative 2040
City Future Buildout VMT per SP	22.51	22.51
Project-generated VMT per SP	21.90	20.87
Percent Change	-2.71%	-7.29%
Potentially Significant?	No	No

PROJECT'S CUMULATIVE IMPACT ON VMT

The SBCTA Guidelines notes that if the cumulative no project shall reflect the adopted RTP/SCS; as such, if a project is consistent with the regional RTP/SCS, then the cumulative impacts shall be considered less than significant subject to consideration of other substantial evidence. The Project's proposed land use assumptions is consistent with the City's General Plan. Therefore, the Project's cumulative impact is also considered less than significant.

CONCLUSION

The Project was evaluated against SBCTA Guidelines stated VMT screening criteria but was found to not meet available screening thresholds. As required by SBCTA Guidelines, a project level VMT analysis was performed consistent with the requirements identified for single use warehouse projects. The Project was not found to exceed City of Highland's future buildout VMT per SP for both baseline and cumulative conditions. The Project's impact to VMT is therefore presumed to be less than significant.

If you have any questions, please contact me directly at 949-660-1994.

Respectfully submitted,

URBAN CROSSROADS, INC.



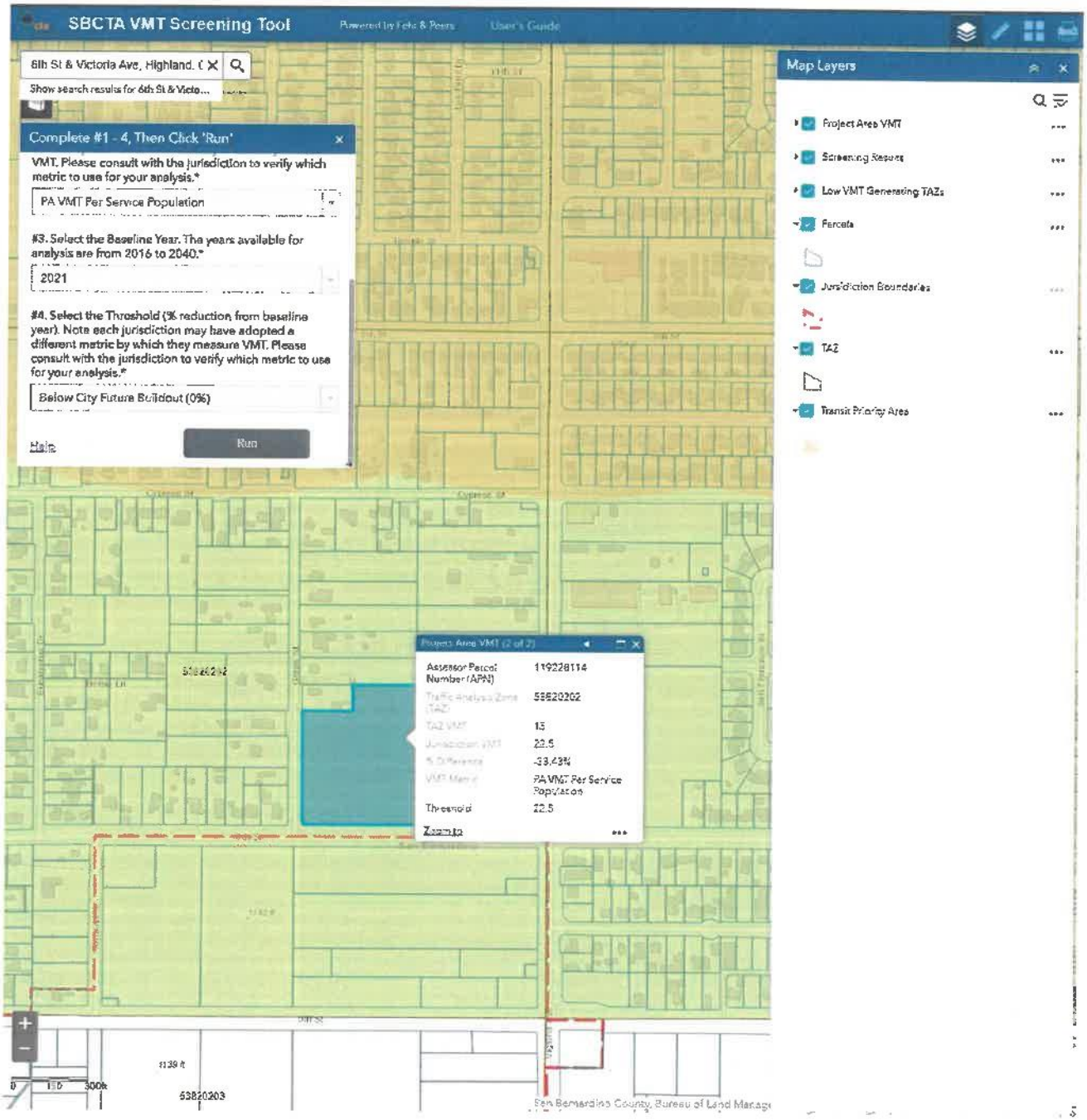
Alexander So
Senior Analyst

REFERENCES

1. **Office of Planning and Research.** *Technical Advisory on Evaluating Transportation Impacts in CEQA.* State of California : s.n., December 2018.
2. **San Bernardino County Transportation Authority (SBCTA).** *Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment.* February 2020.
3. **Institute of Transportation Engineers.** *Trip Generation Manual.* 10th Edition. 2017.
4. **Southern California Association of Governments.** *Employment Density Study.* October 2001.

ATTACHMENT A
SBCTA VMT SCREENING TOOL RESULTS

SBCTA SCREENING TOOL RESULTS



ATTACHMENT B
PROJECT TRIP GENERATION

TABLE 1: PROJECT TRIP GENERATION SUMMARY

Land Use	ITE Code	Size/Units		Daily	AM Peak Hour			PM Peak Hour		
					In	*Out*	*Total*	*In*	*Out*	*Total*
Trip Rates[1]										
Warehousing	150	TSF		1.74	0.13	0.04	0.17	0.05	0.14	0.19
Trip Generation										
6th & Victoria Avenue Warehouse	150	307.445	TSF	535	40	12	52	16	43	58
Trip Generation (PCE Adjustments)										
Warehousing Vehicle Mix[2]		Percent[2]								
Passenger Vehicles		72.5%		388	29	9	38	11	31	42
2-Axle Trucks		4.6%		25	2	1	2	1	2	3
3-Axle Trucks		5.7%		30	2	1	3	1	2	3
4+-Axle Trucks		17.2%		92	7	2	9	3	7	10
Project Trip Generation (Non-PCE)				***535***	***40***	***12***	***52***	***16***	***43***	***58***
		PCE Factor[3]								
Passenger Vehicles		1.0		388	29	9	38	11	31	42
2-Axle Trucks		1.5		37	3	1	4	1	3	4
3-Axle Trucks		2.0		61	5	1	6	2	5	7
4+-Axle Trucks		3.0		276	21	6	27	8	22	30
Project Trip Generation (PCE)				762	57	17	74	22	61	83

Notes: TSF = Thousand Square Feet

[1] Trip rates from the Institute of Transportation Engineers (ITE), Trip Generation, 10th Edition, 2017.

[2] Vehicle Mix and Percent from SCAQMD, Warehouse Truck Trip Study Data Results and Usage, July 2014.

[3] Passenger Car Equivalent (PCE) factors per the San Bernardino County Congestion Management Program (CMP), 2016.

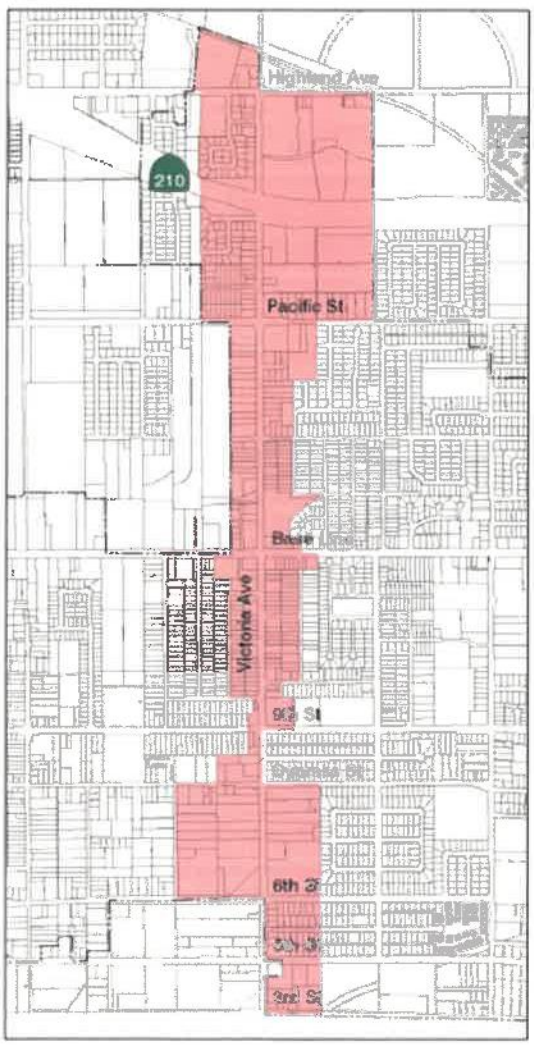
Source: Dudek

Attachment 7

General Plan Except – Victoria Avenue Corridor Policy Area

Victoria Avenue Corridor

As the primary passenger entryway into the San Bernardino International Airport from I-210, new land use patterns will need to be established to take advantage of future commercial opportunities, improve traffic and provide future development opportunities along Victoria Avenue. Currently, single-family residential uses and scattered strip development maintain individual access points to Victoria Avenue, which create



significant traffic congestion. Furthermore, to accommodate future traffic volumes, Victoria Avenue will need to be expanded and could impact current and future development along the corridor. To ensure quality development opportunities in the future, individual parcels will need to be consolidated.

GOAL 2.14

Establish the Victoria Avenue Corridor as the major entryway into the San Bernardino International Airport.

Policies

1) Concentrate commercial uses along Victoria Avenue at Base Line, Pacific Street and Highland Avenue.

2) Allow for a mix of commercial and residential uses in appropriate areas through the Planned Development land use designation.

3) Provide residential opportunities in mid-block areas between 9th Street and Pacific Avenue.

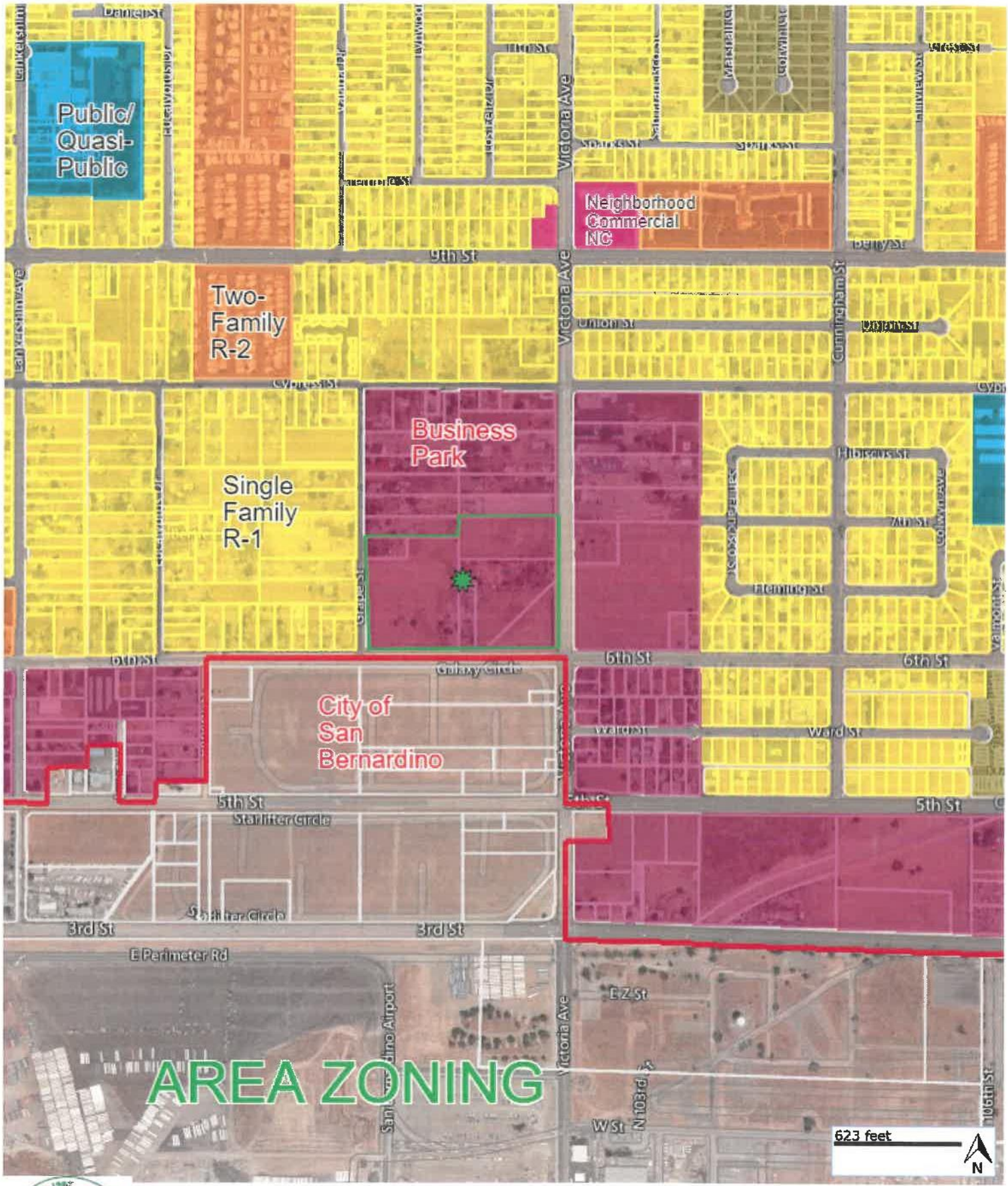
4) Encourage the consolidation of parcels to promote quality, planned development.

5) Consolidate access points along Victoria Avenue to improve traffic flows.

6) Create a major business park node at the southern terminus of Victoria Avenue to maximize employment opportunities adjacent to the airport.

Attachment 8

Zoning Overview



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Attachment 9

Project Plan Set

Site Plan, Building Elevations, Grading, Landscaping, Parcel Map

6TH & VICTORIA

6TH ST. AND VICTORIA AVE
HIGHLAND, CA 92346



SHEET INDEX	
A0	COVER SHEET
A1	SITE PLAN
A1_1	SITE DETAILS
A1_2	SITE DETAILS
A1_3	SITE DETAILS
A1_4	SITE DETAILS
A2	FLOOR PLAN
A2_1	ENLARGED FLOOR PLAN
A4	EXTERIOR ELEVATIONS
C1	PRELIMINARY GRADING PLAN
C2	TENTATIVE PARCEL MAP
L1	CONCEPTUAL LANDSCAPE PLAN
L2	COLOR LANDSCAPE PLAN
E1	PHOTOMETRIC LIGHTING PLAN

PROJECT
2ND PLANNING SUBMITTAL

PATRIOT PARTNERS 6TH AND VICTORIA
HIGHLAND, CA

HERDMAN
ARCHITECTURE + DESIGN

A20-2122
06.05.2021

TITLE SHEET

A0

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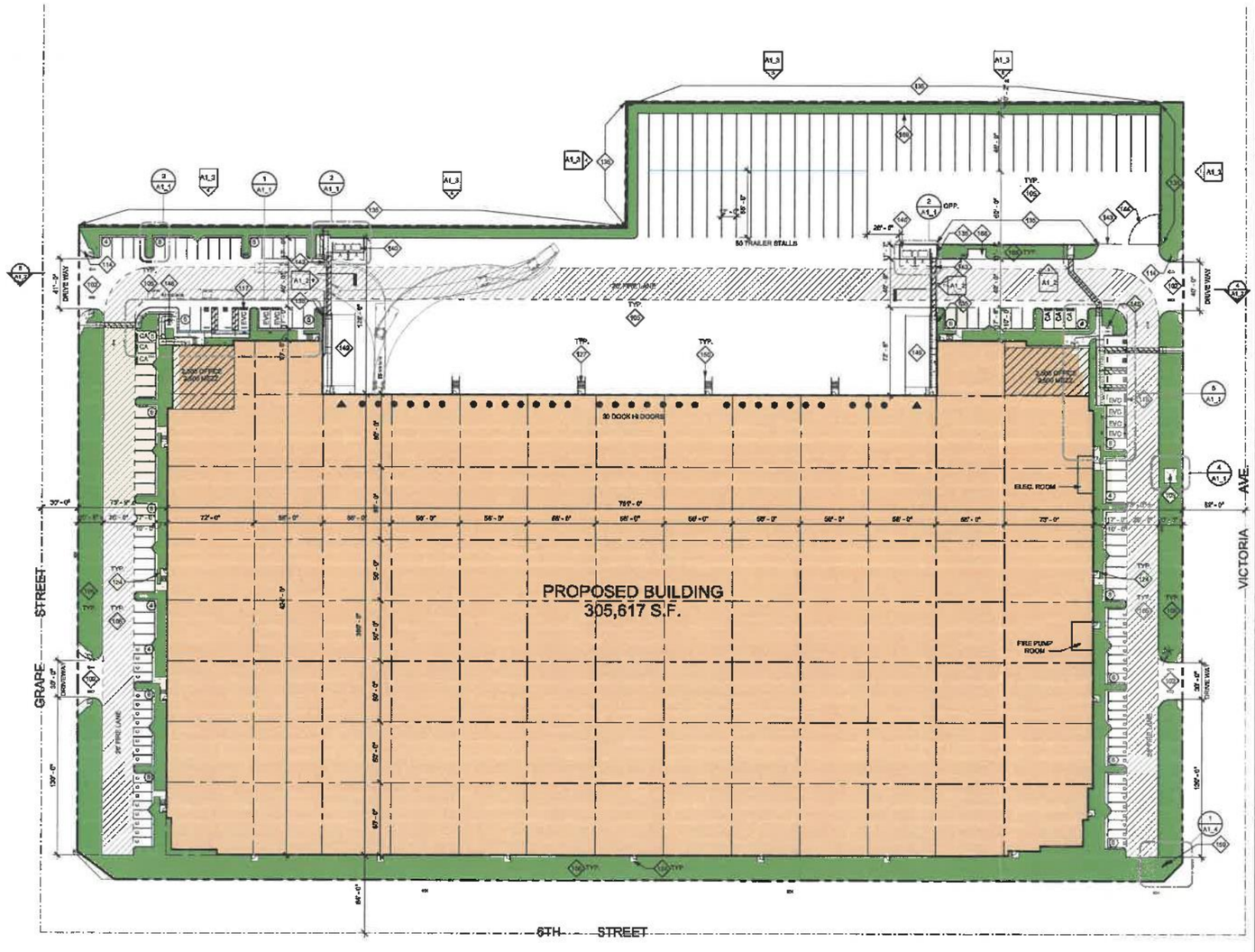


1 PROPOSED SITE PLAN
1" = 40'-0"

DEVELOPER/OWNER

ADDRESS:
CONTACT: KEVIN RICE
PHONE: 858.952.4134
EMAIL: KEVIN@PATRIOTDEVELOPMENTPARTNERS.COM

APPLICANT'S REPRESENTATIVE/ARCHITECT

HERDMAN ARCHITECTURE & DESIGN, INC.
18551 SCIENTIFIC WAY
IRVINE, CA 92618
CONTACT: BRIDGET HERDMAN
PHONE: 714.389.2000
EMAIL: BRIDGET@HERDMAN-AD.COM

SCOPE OF WORK

CONSTRUCT NEW ONE STORY CONCRETE TILT-UP WAREHOUSE/DISTRIBUTION FACILITY WITH EXTERIOR LIGHTING, FIRE SPRINKLERS, ON SITE AND OFF-SITE IMPROVEMENTS INCLUDING GRADING, STORM DRAINS, WATER, SEWER, FIRE HYDRANTS, LANDCAPE, IRRIGATION AND HARDSCAPE, TRASH ENCLOSURES, CONCRETE SCREEN WALLS, AND SLIDING/SWINGING METAL GATES AS SHOWN.

LEGAL DESCRIPTION

ASSESSOR'S PARCEL NO: SEE SHEET C1 FOR APN

SEE SHEET C1 FOR LEGAL DESCRIPTION

ZONING: BUSINESS PARK

SITE LEGEND

- LANDSCAPE AREA
- CONCRETE PAVING
- BUILDING AREA
- 2' OVERHANG / 18' / STANDARD PARKING STALL PER CITY REQUIREMENT
- 2' OVERHANG / 15' / COMPACT PARKING STALL PER CITY REQUIREMENT
- VANPOOL PARKING STALL MARKING " VANPOOL " PER CITY REQUIREMENT
- TYP. ACCESSIBLE PARKING STALL WITH 8' ACCESS AISLE PER CBC 2019 11B 502.2
- TYP. VAN ACCESSIBLE PARKING STALL WITH 8' ACCESS AISLE PER CBC 2019 11B 502.2
- CLEAN AIR PARKING STALL: PAINT, IN THE PAINT USED FOR STALL STRIPING, THE FOLLOWING CHARACTERS SUCH THAT THE LOWER EDGE OF THE LAST WORD ALIGNS WITH THE END OF STALL STRIPING AND IS VISIBLE BENEATH A PARKED VEHICLE: CLEAN AIR/ VANPOOL/ EV — PER CALGREEN 5.106.5.2.1
- ELECTRIC VEHICLE CHARGING STATION: EVCS STALL SHALL PROVIDE SURFACE MARKING STATING " EV CHARGING ONLY " IN LETTER 12" HIGH MINIMUM, THE LOWER EDGE OF THE LAST WORD ALIGNS WITH THE END OF STALL STRIPING AND IS VISIBLE BENEATH A PARKED VEHICLE — PER CBC 2019 11B-812.9 NOTE: FUTURE CHARGING SPACES QUALIFY AS DESIGNATED PARKING AS DESCRIBED IN SECTION 5.106.5.2 SHALL PROVIDE SURFACE MARKING STATING "CLEAN AIR/VANPOOL/EV"
- PATH OF TRAVEL
- PROPERTY LINE

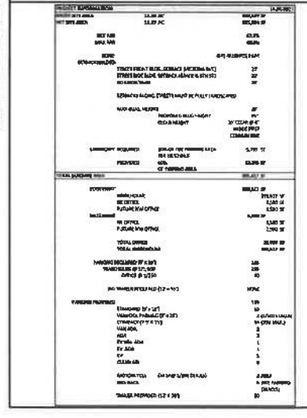
KEYNOTES

102	PROPOSED DRIVEWAY, PER JURISDICTIONAL STANDARDS.
105	CONCRETE PAVING.
106	PROPOSED LANDSCAPED AREA. SEE LANDSCAPING PLANS.
108	(U) TRANSFORMER LOCATION. PROVIDE FIRE BOLLARD PROTECTION POSTS PER UTILITY COMPANY REQUIREMENTS.
114	ACCESSIBLE SITE ENTRANCE SIGN.
117	FUTURE STANDARD ACCESSIBLE EV CHARGING ONLY PARKING STALL.
118	FUTURE VAN ACCESSIBLE EV CHARGING ONLY PARKING STALL.
124	EXTERIOR CONCRETE LANDING.
127	CONCRETE STAIR ON GRADE TYPE "C".
135	PAINTED CONCRETE TILT-UP SCREEN WALL OR TRASH ENCLOSURE WALL. PAINT BOTH SIDES AND TOP OF WALL. SEE ARCHITECTURAL DRAWINGS FOR COLOR SCHEDULE.
140	TRASH ENCLOSURE w/ ROOF COVERING.
143	PAINTED STEEL ROLLING GATE(S). PROVIDE CONDUIT TO GATE FOR FUTURE MOTOR & OFFICE AREA FOR FUTURE INTERCOM CONTROL. PROVIDE KNOX BOX AS REQUIRED BY FIRE AUTHORITY.
144	PAINTED STEEL SWINGING GATE(S). PROVIDE CONDUIT TO GATE FOR FUTURE MOTOR & OFFICE AREA FOR FUTURE INTERCOM CONTROL. PROVIDE KNOX BOX AS REQUIRED BY FIRE AUTHORITY.
148	2 POSITION BIKE RACK.
149	CONCRETE TRUCK RAMP w/ 42" HIGH CONCRETE TILT-UP GUARD ON OPEN SIDE(S). PAINT ALL SIDES OF GUARD WALLS AND HANDRAILS. SEE ARCHITECTURAL DRAWINGS FOR COLOR SCHEDULE.
150	STEEL PIPE BOLLARD PROTECTION POST.
159	MONUMENT SIGN.
168	PROVIDE MOTORCYCLE PARKING SPACE.
169	12"H x 6" w CONCRETE CURB AT TRUCK COURT TYPICAL.

SITE PLAN GENERAL NOTES

1. THIS SITE PLAN SHALL MEET ALL ENGINEERING & NPDES REQUIREMENTS.
2. GENERAL CONTRACTOR TO REVIEW THE SOILS REPORT AND ALL AMENDMENTS LISTED ON THE TITLE SHEET AND FOLLOW ALL RECOMMENDATIONS.
3. U.O.N., ALL DIMENSIONS TO CONCRETE WALLS AND CURBS ARE EITHER TO THE CENTER (SHOWN WITH A CENTERLINE) OR FACE OF THE WALL OR CURB. ALL DIMENSIONS TO FRAMED WALLS ARE EITHER TO THE CENTERLINE OF THE WALL FRAMING (SHOWN WITH A CENTERLINE) OR THE FACE OF THE WALL FINISH.
4. REFER TO CIVIL AND MEP PLANS TO CONFIRM UTILITY INFORMATION SHOWN ON THE ARCHITECT'S SITE PLAN AND FOR ADDITIONAL UTILITY INFORMATION. GENERAL CONTRACTOR TO COORDINATE ALL POINTS OF CONNECTION.
5. REFER TO CIVIL DRAWINGS FOR ALL FINISHED GRADES AND SLOPES. ALL FINISHED GRADES TO PROVIDE POSITIVE DRAINAGE AWAY FROM THE BUILDING. GENERAL CONTRACTOR TO FIELD VERIFY.
6. ALL ACCESSIBLE ROUTES INDENTIFIED ON THE SITE PLAN DRAWINGS SHALL CONFORM TO THE FOLLOWING:
   a) SLOPES IN THE DIRECTION OF TRAVEL DO NOT EXCEED 5%. CROSS SLOPES DO NOT EXCEED 2%.
   b) THE CLEAR WIDTH OF ALL WALKWAYS IS 4'-0" MIN.
   c) CHANGES IN LEVEL UP TO 1/2" COMPLY w/ 11A9.2.1. CHANGES IN LEVEL GREATER THAN 1/2" IF THEY OCCUR ARE RAMPED. SEE PLANS.
   d) THE VERTICAL CLEARANCE ALONG THE ACCESSIBLE ROUTES IS 80" MIN.
7. ALL PAVED AND LANDSCAPED AREAS TO BE BOUND BY A MIN. 6" HIGH, 6" WIDE CONCRETE CURB U.O.N.
8. A CONCRETE MOW STRIP EXTENDING 12" BEYOND EA END OF THE OPENING SHALL BE PROVIDED @ ALL EXTERIOR GLAZING WHERE THE SILL IS WITHIN 5' VERICAL OF THE FINISHED GRADE. SEE 3/AD1.1
9. PROVIDE PIPE BOLLARD PROTECTION POSTS AS REQUIRED BY UTILITY COMPANIES AND OR FIRE AUTHORITIES AT ALL EXTERIOR ELECTRICAL EQUIPMENT AND/OR FIRE PREVENTION DEVICES. IF PIPE BOLLARD PROTECTION POST DETAILS ARE NOT PROVIDED BY UTILITY COMPANIES AND OR FIRE AUTHORITY SEE DETAIL 3/AD1.1
10. ALL EXPOSED BIORETENTION DEVICE COVERINGS SHALL BE PAINTED FORREST GREEN.
11. WHERE OCCURS, GENERAL CONTRACTOR TO PROVIDE FLUID APPLIED DAMP PROOFING AT ALL RETAINING AND PLANTER WALLS WHERE THE SIDE OF THE WALL OPPOSITE THE SOIL SIDE IS EXPOSED TO VIEW AND ALL EXTERIOR WALLS WHERE THE ADJACENT FLOOR SLAB IS BELOW GRADE. SEE 19/AD1.1

PROJECT INFORMATION



VICINITY MAP



PROJECT
PATRIOT PARTNERS 6TH AND VICTORIA
2ND PLANNING SUBMITTAL
HIGHLAND, CA

HERDMAN
ARCHITECTURE + DESIGN

A20-2122
10.11.2021

SITE PLAN

A1

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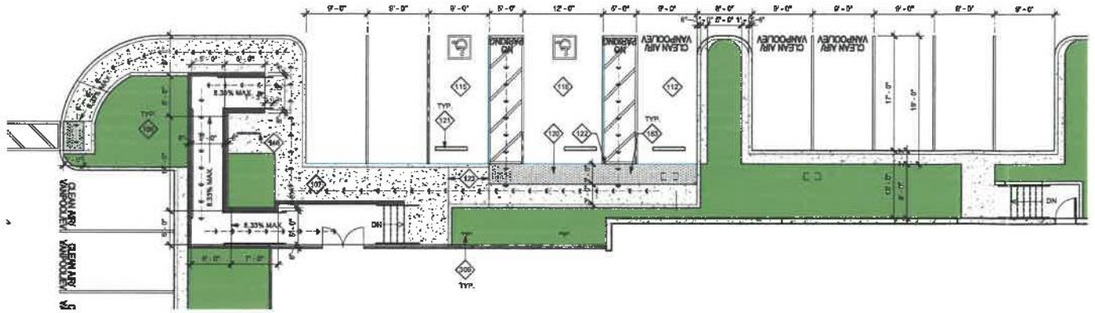
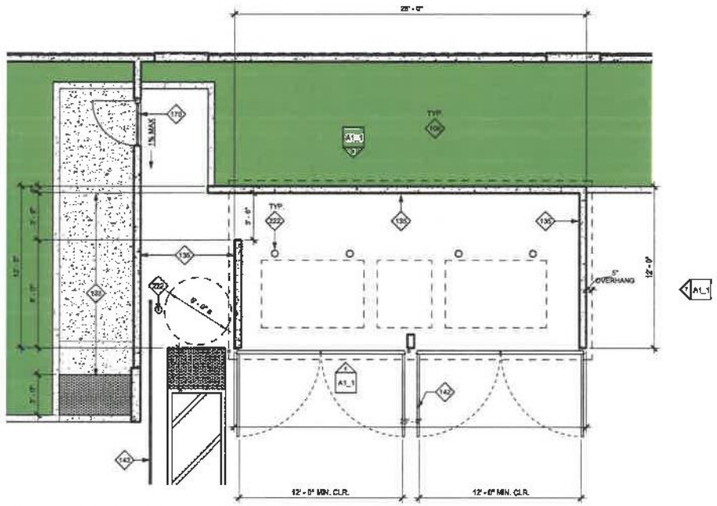
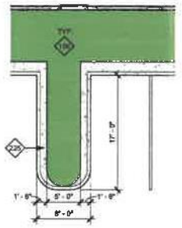


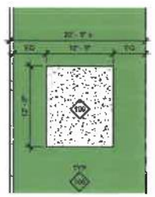
1 ENLARGED SITE PLAN - WEST
1/8" = 1'-0"



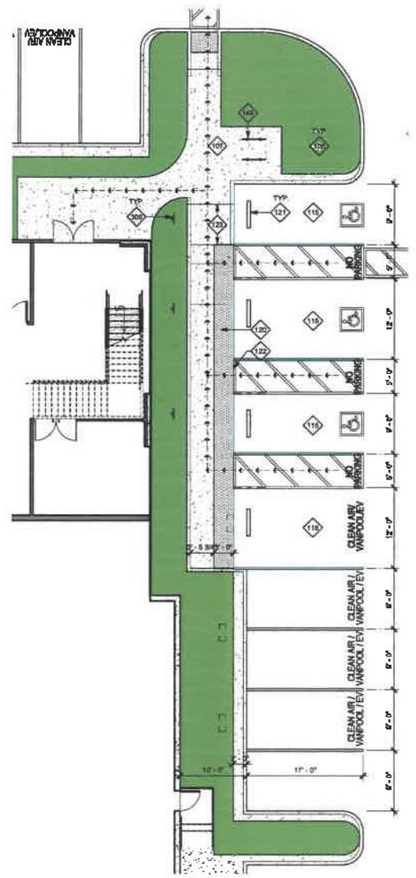
2 ENLARGED TRASH ENCLOSURE
1/4" = 1'-0"



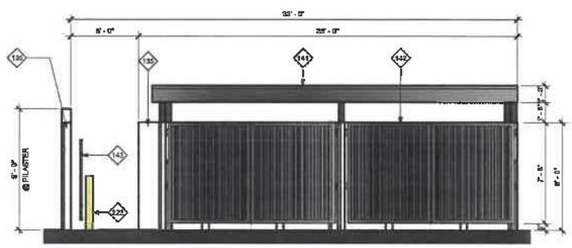
3 LANDSCAPE FINGER AND OVERHANG DETAIL
1/8" = 1'-0"



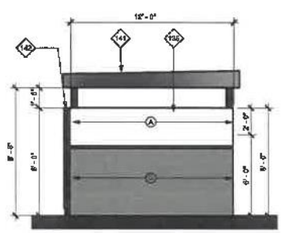
4 TRANSFORMER DETAIL
1/8" = 1'-0"



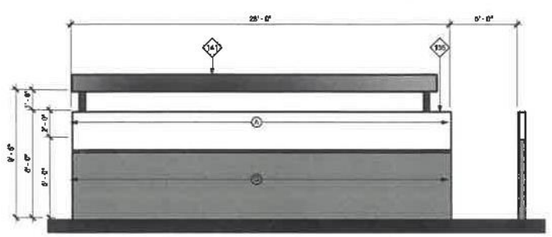
5 ENLARGED SITE PLAN - EAST
1/8" = 1'-0"



6 TRASH ENCLOSURE SOUTH ELEVATION
1/4" = 1'-0"



7 TRASH ENCLOSURE EAST ELEVATION
1/4" = 1'-0"



8 TRASH ENCLOSURE NORHT ELEVATION
1/4" = 1'-0"

KEYNOTES

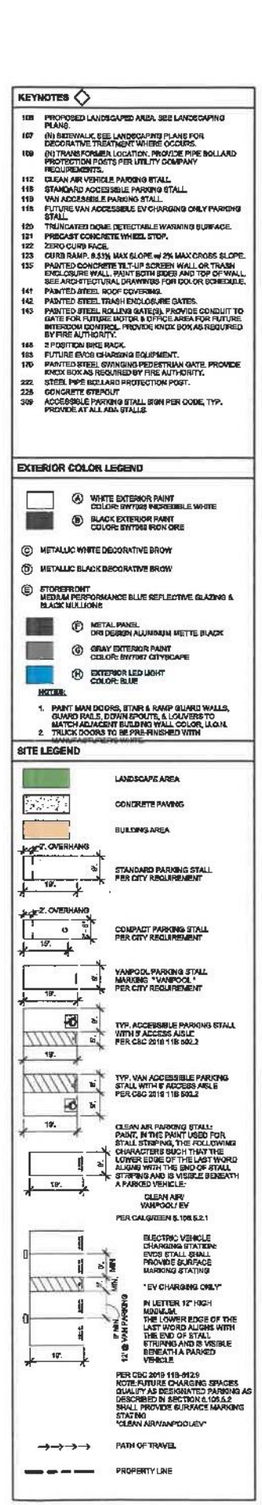
108	PROPOSED LANDSCAPED AREA. SEE LANDSCAPING PLANS.
107	(N) SIDEWALK. SEE LANDSCAPING PLANS FOR DECORATIVE TREATMENT WHERE OCCURS.
109	(N) TRANSFORMER LOCATION. PROVIDE PIPE BOLLARD PROTECTION POSTS PER UTILITY COMPANY REQUIREMENTS.
112	CLEAN AIR VEHICLE PARKING STALL.
113	STANDARD ACCESSIBLE PARKING STALL.
115	VAN ACCESSIBLE PARKING STALL.
116	FUTURE VAN ACCESSIBLE EV CHARGING ONLY PARKING STALL.
120	TRUNCATED DOME DETECTABLE WARNING SURFACE.
121	PRECAST CONCRETE WHEEL STOP.
122	ZERO CURB FACE.
123	CB10 RAMP. 8.33% MAX SLOPE w/ 2% MAX CROSS SLOPE.
135	PAINTED CONCRETE TILT-UP SCREEN WALL OR TRASH ENCLOSURE WALL. PAINT BOTH SIDES AND TOP OF WALL. SEE ARCHITECTURAL DRAWINGS FOR COLOR SCHEDULE.
141	PAINTED STEEL ROOF COVERING.
142	PAINTED STEEL TRASH ENCLOSURE GATES.
143	PAINTED STEEL ROLLING GATE(S). PROVIDE CONDUIT TO GATE FOR FUTURE MOTOR & OFFICE AREA FOR FUTURE INTERCOM CONTROL. PROVIDE KNOX BOX AS REQUIRED BY FIRE AUTHORITY.
165	2 POSITION BIKE RACK.
165	FUTURE EVCS CHARGING EQUIPMENT.
170	PAINTED STEEL SWINGING PEDESTRIAN GATE. PROVIDE KNOX BOX AS REQUIRED BY FIRE AUTHORITY.
222	STEEL PIPE BOLLARD PROTECTION POST.
226	CONCRETE STEMOUT
309	ACCESSIBLE PARKING STALL SIGN PER CODE, TYP. PROVIDE AT ALL ADA STALLS

EXTERIOR COLOR LEGEND

- (A) WHITE EXTERIOR PAINT COLOR: SW7006 WORKABLE WHITE
- (B) BLACK EXTERIOR PAINT COLOR: SW7069 IRON ORE
- (C) METALLIC WHITE DECORATIVE BROW
- (D) METALLIC BLACK DECORATIVE BROW
- (E) STOREFRONT MEDIUM PERFORMANCE BLUE REFLECTIVE GLAZING & BLACK MULLIONS
- (F) METAL PANEL DRI DESIGN ALUMINUM MATTE BLACK
- (G) GRAY EXTERIOR PAINT COLOR: SW7067 CITYSCAPE
- (H) EXTERIOR LED LIGHT COLOR: BLUE

NOTES:
1. PAINT MAN DOORS, STAIR & RAMP GUARD WALLS, GUARD RAILS, DOWN SPOUTS, & LOUVERS TO MATCH ADJACENT BUILDING WALL COLOR, U.O.N.
2. TRUCK DOORS TO BE PRE-FINISHED WITH

SITE LEGEND



PROJECT
PATRIOT PARTNERS 6TH AND VICTORIA
HIGHLAND, CA
2ND PLANNING SUBMITTAL

HERDMAN
ARCHITECTURE + DESIGN
A20-2122
08.05.2021

SITE DETAILS

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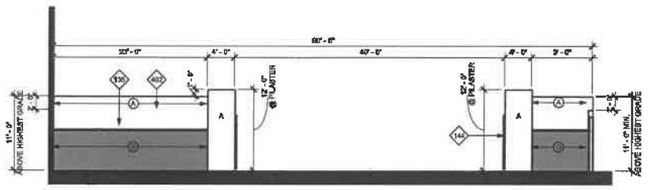
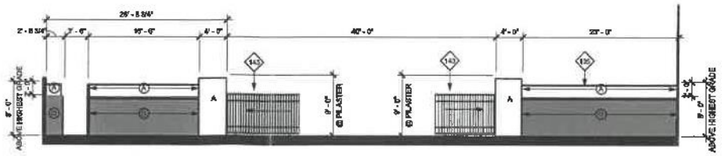
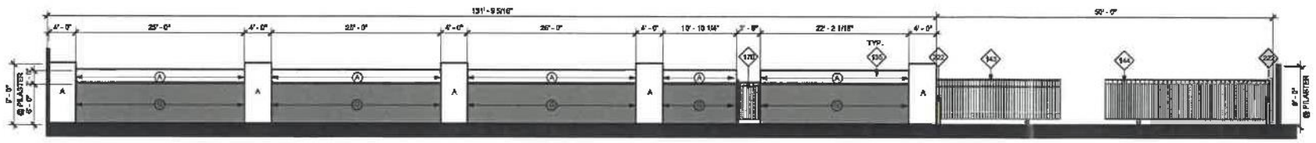


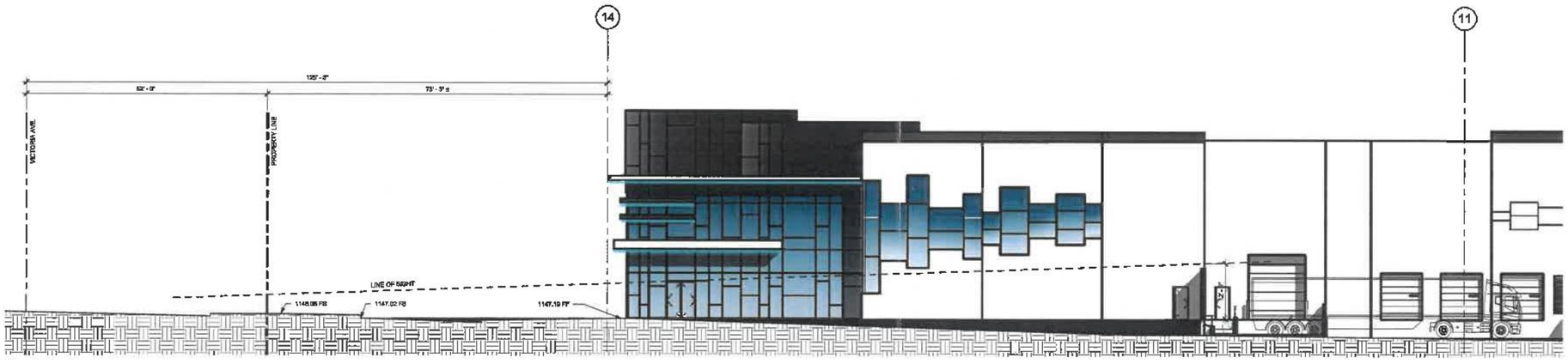
1 SITE WALL ELEVATION
1/8" = 1'-0"



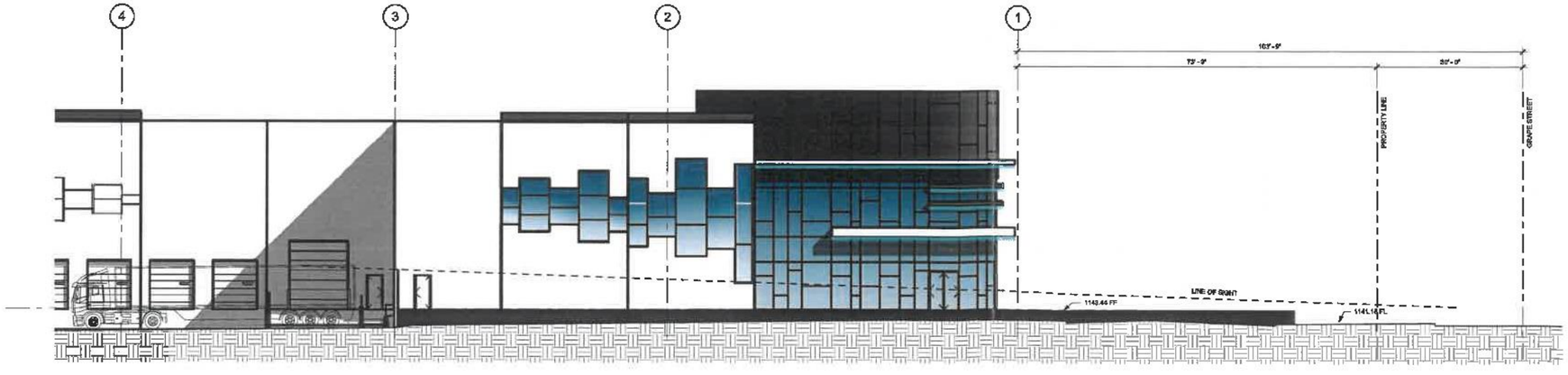
2 SITE WALL ELEVATION
1/8" = 1'-0"



3 SITE WALL ELEVATION
1/8" = 1'-0"



4 LINE OF SIGHT - VICTORIA AVE.
1" = 10'-0"



5 LINE OF SIGHT - GRAPE ST.
1" = 10'-0"

KEYNOTES

135	PAINTED CONCRETE TILT-UP SCREEN WALL OF TRASH ENCLOSURE WALL. PAINT BOTH SIDES AND TOP OF WALL. SEE ARCHITECTURAL DRAWINGS FOR COLOR SCHEDULE.
143	PAINTED STEEL ROLLING GATE(S). PROVIDE CONDUIT TO GATE FOR FUTURE MOTOR & OFFICE AREA FOR FUTURE INTERCOM CONTROL. PROVIDE KNOX BOX AS REQUIRED BY FIRE AUTHORITY.
144	PAINTED STEEL SWINGING GATE(S). PROVIDE CONDUIT TO GATE FOR FUTURE MOTOR & OFFICE AREA FOR FUTURE INTERCOM CONTROL. PROVIDE KNOX BOX AS REQUIRED BY FIRE AUTHORITY.
170	PAINTED STEEL SWINGING PEDESTRIAN GATE. PROVIDE KNOX BOX AS REQUIRED BY FIRE AUTHORITY.
322	STEEL PIPE BOLLARD PROTECTION POST.
402	WALL REVEAL

EXTERIOR COLOR LEGEND

- (A) W-SITE EXTERIOR PAINT COLOR: SW7065 INCREDIBLE WHITE
- (B) BLACK EXTERIOR PAINT COLOR: SW7069 IRON ORE
- (C) METALLIC WHITE DECORATIVE BROW
- (D) METALLIC BLACK DECORATIVE BROW
- (E) STOREFRONT MEDIUM PERFORMANCE BLUE REFLECTIVE GLAZING & BLACK MULLIONS
- (F) METAL PANEL DRI DESIGN ALUMINUM MISTE BLACK
- (G) GRAY EXTERIOR PAINT COLOR: SW7067 CITYSCAPE
- (H) EXTERIOR LED LIGHT COLOR: BLUE

NOTES:
1. PAINT MAN DOORS, STAIR & RAMP GUARD WALLS, GUARD RAILS, DOWN SPOUTS, & LOUVERS TO MATCH ADJACENT BUILDING WALL COLOR, U.O.N.
2. TRUCK DOORS TO BE PRE-FINISHED WITH MANUFACTURER'S WHITE.

PROJECT
2ND PLANNING SUBMITTAL

PATRIOT PARTNERS 6TH AND VICTORIA
HIGHLAND, CA

HERDMAN
ARCHITECTURE + DESIGN
A20-2122
09.05.2021

SITE DETAILS

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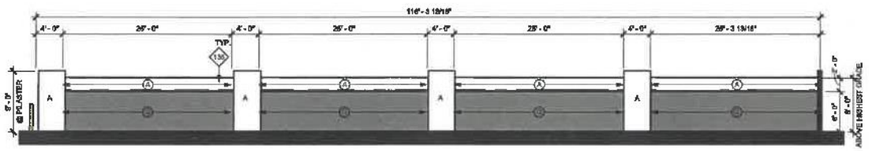
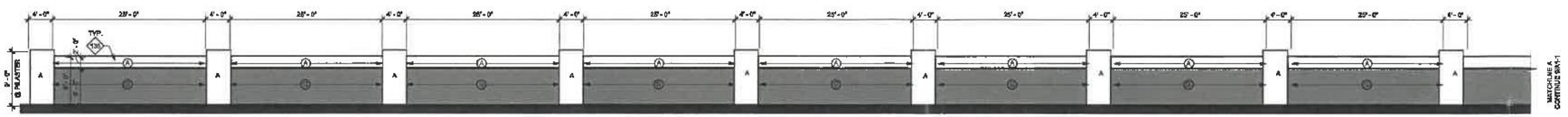
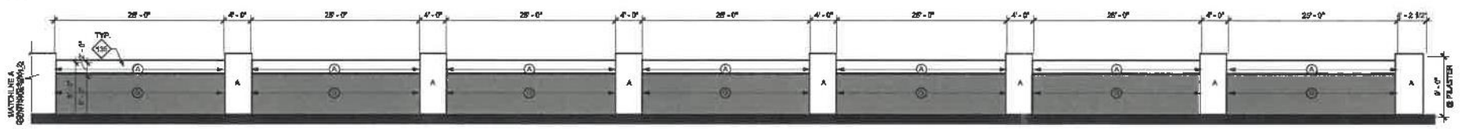


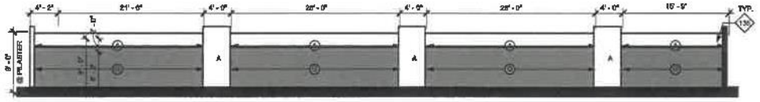
① WEST CONCRETE SITE WALL - VICTORIA AVE
1/8" = 1'-0"



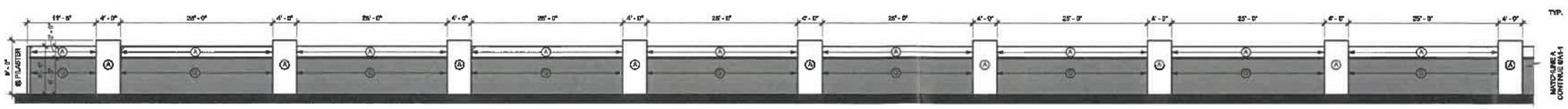
② NORTH CONCRETE SITE WALL - NORTH 2
1/8" = 1'-0"



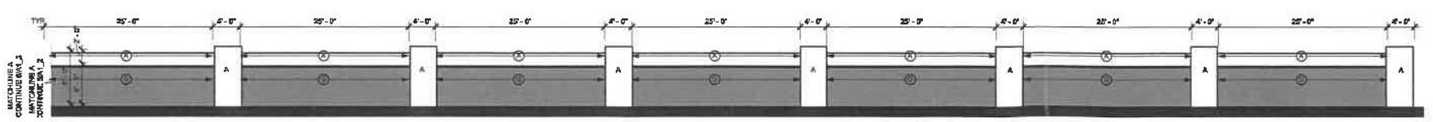
③ NORTH CONCRETE SITE WALL - NORTH 2 CONTINUED
1/8" = 1'-0"



④ NORTH CONCRETE SITE WALL - WEST
1/8" = 1'-0"



⑤ NORTH CONCRETE SITE WALL - NORTH 1
1/8" = 1'-0"



⑥ NORTH CONCRETE SITE WALL - NORTH 1 CONTINUED
1/8" = 1'-0"

KEYNOTES

135 PAINTED CONCRETE TILT-UP SCREEN WALL OR TRASH ENCLOSURE WALL. PAINT BOTH SIDES AND TOP OF WALL. SEE ARCHITECTURAL DRAWINGS FOR COLOR SCHEDULE.

EXTERIOR COLOR LEGEND

- (A) WHITE EXTERIOR PAINT COLOR: SW7008 NOREDDIBLE WHITE
- (B) BLACK EXTERIOR PAINT COLOR: SW7069 IRON ORE
- (C) METALLIC WHITE DECORATIVE BROW
- (D) METALLIC BLACK DECORATIVE BROW
- (E) STOREFRONT MEDIUM PERFORMANCE BLUE REFLECTIVE GLAZING & BLACK MULLIONS
- (F) METAL PANEL DRI DESIGN ALUMINUM MATTE BLACK
- (G) GRAY EXTERIOR PAINT COLOR: SW7067 CITYSCAPE
- (H) EXTERIOR LED LIGHT COLOR: BLUE

NOTES:

1. PAINT MAN DOORS, STAIR & RAMP GUARD WALLS, GUARD RAILS, DOWN SPOUTS, & LOUVERS TO MATCH ADJACENT BUILDING WALL COLOR, U.O.N.
2. TRUCK DOORS TO BE PRE-FINISHED WITH MANUFACTURER'S WHITE

PROJECT
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HIGHLAND, CA
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HERDMAN
ARCHITECTURE + DESIGN
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SITE DETAILS

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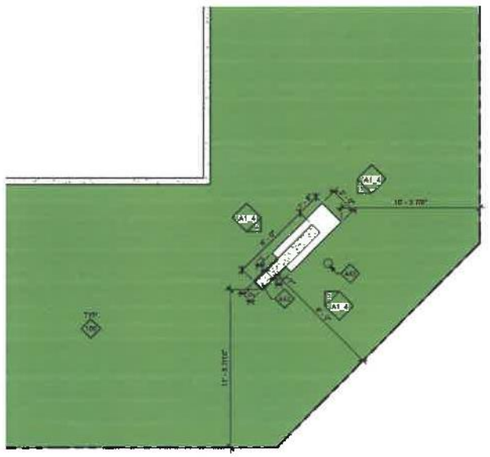
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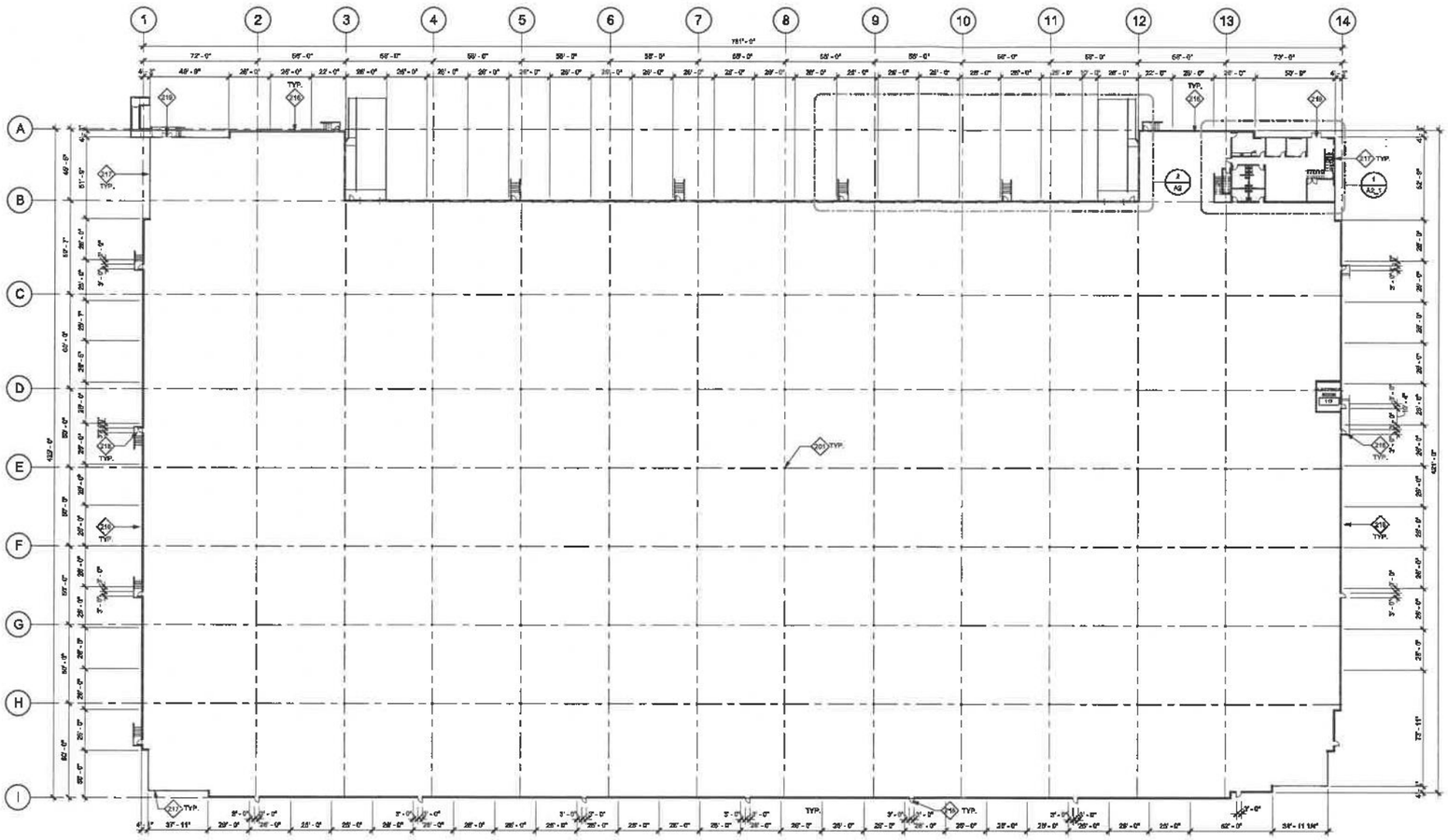
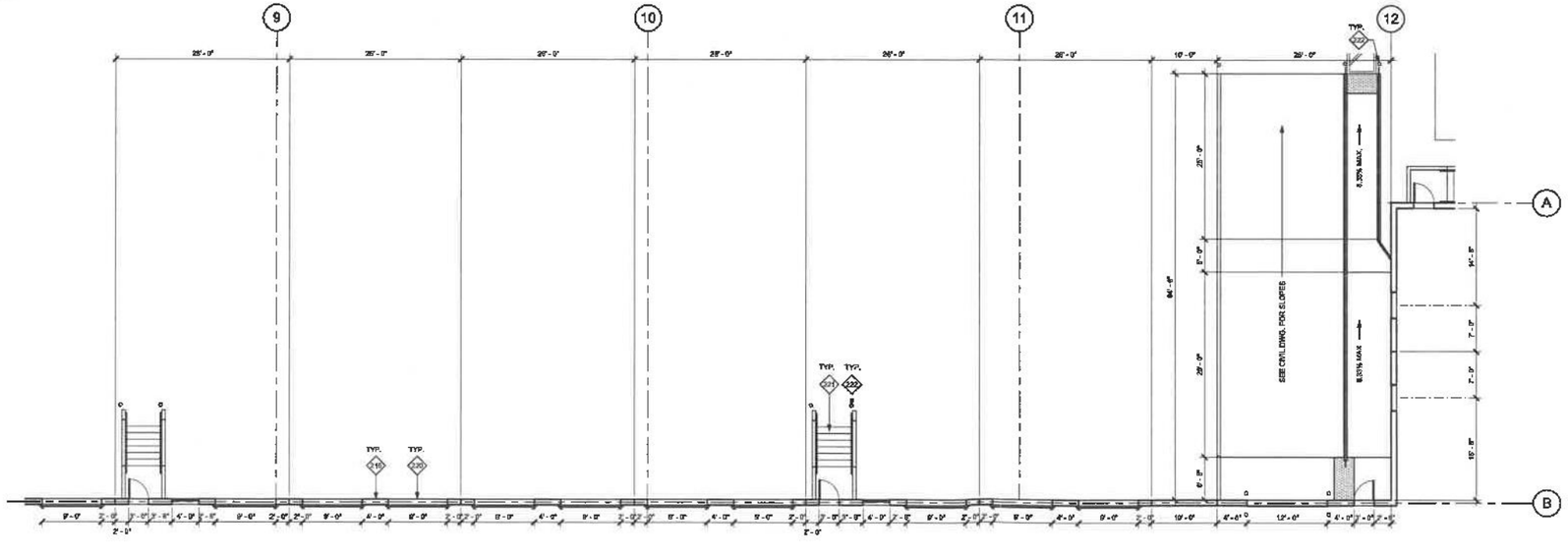


① PROPOSED BUILDING FLOOR PLAN
1/32" = 1'-0"



② TYPICAL DOCK DOOR SPACING PLAN
1/8" = 1'-0"

KEYNOTES

204	STRUCTURAL BUILDING COLUMN.
215	PAINTED CONCRETE TILT-UP WALL PANEL.
217	ALUMINUM FRAMED STOREFRONT SYSTEM.
218	PAINTED HOLLOW METAL PEDESTRIAN DOOR.
219	ACCESSIBLE BUILDING ENTRANCE.
220	PRE FINISHED STEEL SECTIONAL OVERHEAD DOOR.
221	CONCRETE STAIR ON GRADE TYPE 'C'.
222	STEEL PIPE BOLLARD PROTECTION POST.

FLOOR PLAN LEGEND

- EXTERIOR CONCRETE TILT-UP WALL PANEL OR INTERIOR CONCRETE TILT-UP MEZZANINE SHEAR WALL PANEL. SEE STRUCTURAL DRAWINGS FOR ADDITIONAL INFORMATION
- STOREFRONT GLAZING SYSTEM. SEE ENLARGED FLOOR PLANS AND EXTERIOR ELEVATIONS FOR ADDITIONAL INFORMATION
- METAL STUD NON BEARING PARTITION WALL. SEE ENLARGED FLOOR PLANS & WALL TYPE SCHEDULE FOR ADDITIONAL INFORMATION
- WOOD STUD BEARING WALL. SEE ENLARGED FLOOR PLANS & WALL TYPE SCHEDULE FOR ADDITIONAL INFORMATION.
- STRUCTURAL BUILDING COLUMNS
- PROVIDE STEGO WRAP VAPOR BARRIER UNDER PROPOSED OFFICE AREA FLOOR SLAB. SEE 4/A0.1
- FIRE SPRINKLER RISER. SEE FIRE PROTECTION PLANS AND 10/A0.7

FLOOR PLAN GENERAL NOTES

1. PROVIDE FIRE EXTINGUISHERS AS REQUIRED BY THE FIRE DEPARTMENT AND THE CBC/CFC. REQUIREMENTS AND LOCATIONS TO BE DETERMINED IN THE FIELD BY THE FIRE DEPARTMENT INSPECTOR.
2. ALL PENETRATIONS THROUGH FIRE RATED PARTITIONS SHALL BE SEALED WITH APPROVED FIRE CAULKING. SEE 9/HT.A0.10.
3. U.O.N., ALL DIMENSIONS TO CONCRETE WALLS ARE EITHER TO THE CENTER (SHOWN WITH A CENTERLINE) OR FACE OF THE WALL. ALL DIMENSIONS TO FRAMED WALLS ARE EITHER TO THE CENTER OF THE WALL FRAMING (SHOWN WITH A CENTERLINE) OR FACE OF THE WALL FINISH.
4. PROVIDE ILLUMINATED AND TACTILE EXIT SIGNAGES. SEE 6/HT.A2.2, EXITING & SIGNAGE PLANS.
5. SEE CIVIL DRAWINGS FOR ALL UTILITY POINTS OF CONNECTION. GENERAL CONTRACTOR TO VERIFY LOCATIONS.
6. PROVIDE PIPE BOLLARD PROTECTION POSTS @ FIRE RISERS & ELECTRICAL GEAR AS REQUIRED BY THE ELECTRICAL, AND FIRE PROTECTION PLANS. SEE 10/A0.7 FOR ADDITIONAL INFORMATION.
7. FOR REQUIRED LANDINGS @ ACCESSIBLE DOORS, SEE 11/A0.2.1.
8. NO SMOKING IS ALLOWED WITHIN 20' OF ALL BUILDING ENTRANCES PER GREEN BUILDING STANDARD CODE DIVISION 5.504.7. POST REQUIRED SIGNAGE.
9. ALL GYP BD WORK SHALL CONFORM TO THE FOLLOWING:
   a). U.O.N. ON THE FINISH PLANS, ALL DRYWALL FINISHING SHALL BE MIN. LEVEL 4.
   b). ALL EXPOSED GYP BD EDGES SHALL HAVE "L" METAL TRIM.
   c). PROVIDE GYP BD EXPANSION JOINTS AT 30'-0" O.C. MIN WHEREVER UNINTERRUPTED GYP BD WALL SURFACES OCCUR MORE THAN 30'-0" IN ANY DIRECTION. SEE13/AD.7. IF EXPANSION JOINTS ARE REQUIRED, THE GENERAL CONTRACTOR SHALL PROVIDE A SHOP DRAWING SHOWING THE LOCATIONS

PROJECT
PATRIOT PARTNERS 6TH AND VICTORIA
HIGHLAND, CA
2ND PLANNING SUBMITTAL

HERDMAN
ARCHITECTURE + DESIGN
A20-2122
08.06.2021

FLOOR PLAN

A2

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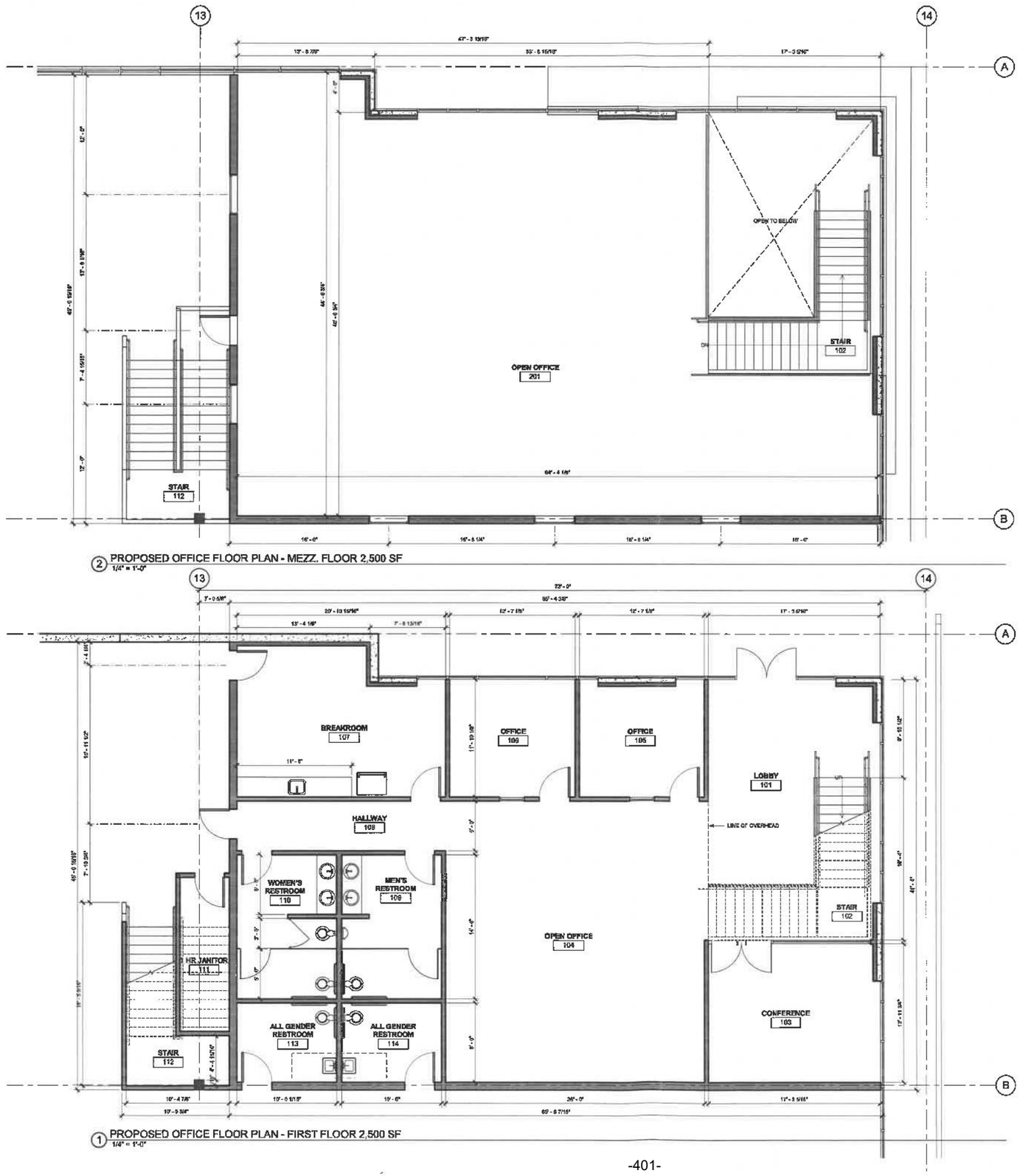

2 PROPOSED OFFICE FLOOR PLAN - MEZZ. FLOOR 2,500 SF
1/4" = 1'-0"

1 PROPOSED OFFICE FLOOR PLAN - FIRST FLOOR 2,500 SF
1/4" = 1'-0"

PROJECT
2ND PLANNING SUBMITTAL

PATRIOT PARTNERS 6TH AND VICTORIA
HIGHLAND, CA

HERDMAN
ARCHITECTURE + DESIGN
A20-2122
08.05.2021

ENLARGED FLOOR PLAN

A2_1

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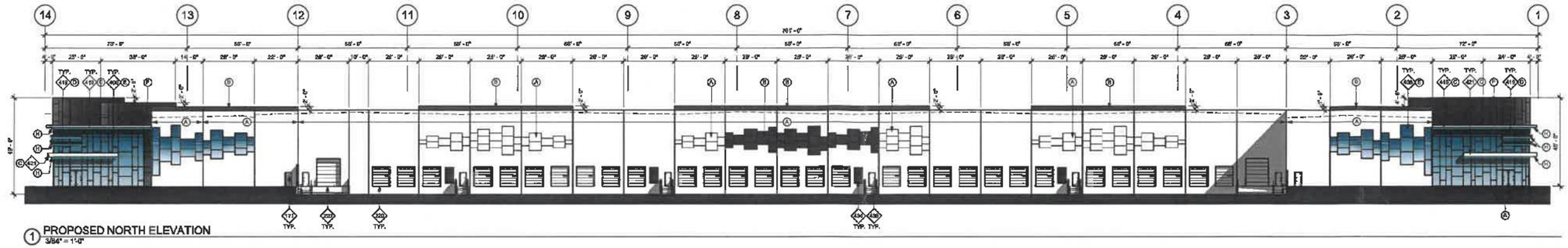
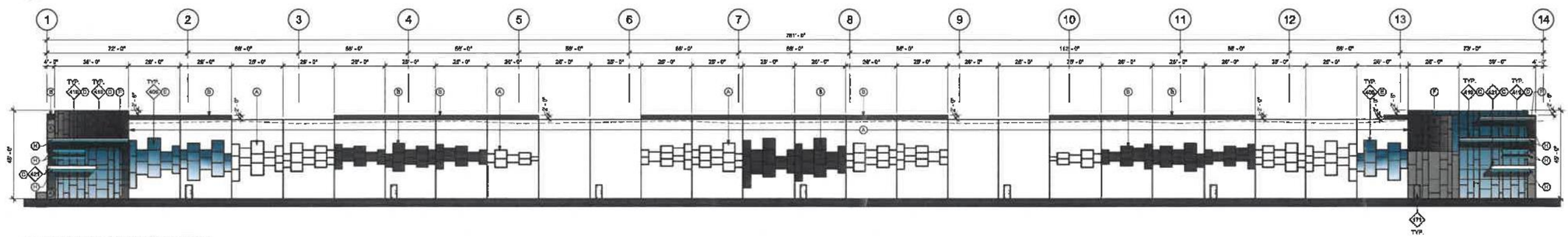
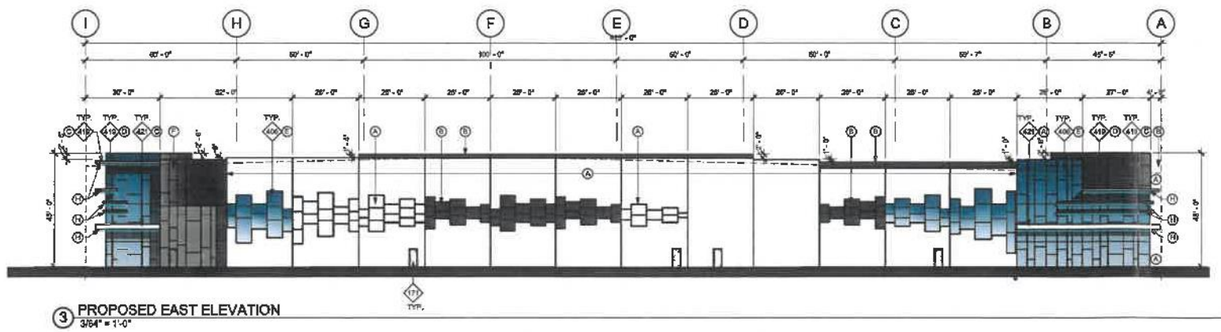


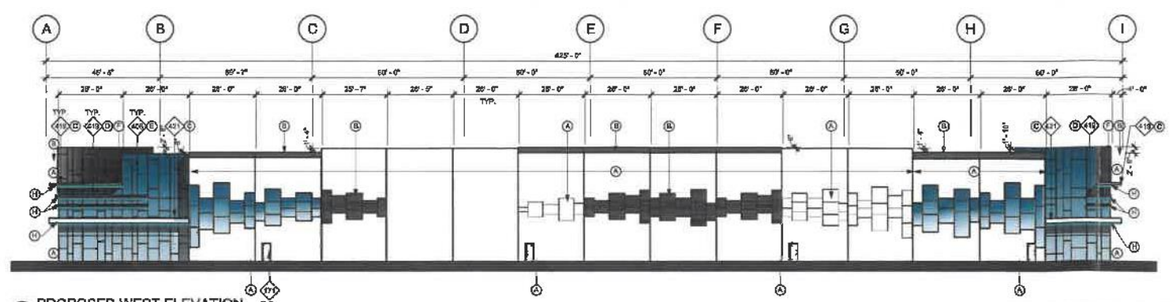
1 PROPOSED NORTH ELEVATION
3/64" = 1'-0"



2 PROPOSED SOUTH ELEVATION
3/64" = 1'-0"



3 PROPOSED EAST ELEVATION
3/64" = 1'-0"



4 PROPOSED WEST ELEVATION
3/64" = 1'-0"

KEYNOTES

171 PAINTED HOLLOW METAL PEDESTRIAN DOOR.
220 PAE PAINTED STEEL SECTIONAL OVERHEAD DOOR.
408 ALUMINUM FRAMED STOREFRONT SYSTEM.
419 DECORATIVE OPEN BROW.
421 DECORATIVE SOLID CANOPY.
424 4'-0"w x 8'-0"h PAINTED STEEL WALL LOUVER TOP @ +10'-0".
436 CONCRETE STAIR ON GRADE TYPE "C".

GLAZING LEGEND & NOTES

STOREFRONT FRAMING:
@ VISION GLAZING, MIN 2"x4 1/2" OFFSET SYSTEM U.N.O. @ NON VISION GLAZING, 2"x1 3/4" OFFSET SYSTEM U.N.O. STOREFRONT SYSTEM TO BE DESIGN BUILD BY THE GENERAL CONTRACTOR AND A DEFERRED SUBMITTAL FOR THIS PERMIT. DESIGN SHALL COMPLY WITH CODE WIND LOADING REQUIREMENTS.

VISION GLAZING:
@ CONDITIONED AREAS USE 1" INSULATED GLASS
@ NONCONDITIONED AREAS USE 1/4" GLASS

NON VISION GLAZING:
USE 1/4" VISION GLASS
BACK PAINTING OF GLASS NOT REQUIRED.
PAINT CONCRETE PANEL BEHIND GLASS BLACK OR DARK BLUE, COLOR TO BE DETERMINED BY ARCH.
CONTRACTOR TO ENSURE SMOOTH CONCRETE FINISH BEHIND GLAZING.

NOTES:
1. ALL GLASS ADJACENT TO WALKING SURFACE OR OPERABLE DOOR OR WINDOW TO BE TEMPERED.
2. @ NON VISION SPANDREL GLAZING IN FRONT OF CONCRETE WALL PANEL, PAINT CONCRETE BEHIND GLASS BLACK AND PROVIDE 1" DIA. VENTILATION HOLES IN THE CONCRETE A MAX OF 4'-0" O.C.
3. @ NON VISION GLAZING NOT IN FRONT OF CONCRETE WALL PANEL, PROVIDE TENDATE IMRAF I 140N FILTER FABRIC SHADE CLOTH.

EXTERIOR COLOR LEGEND & NOTES

(A) WHITE EXTERIOR PAINT
COLOR: SW7028 INCREDIBLE WHITE
(B) BLACK EXTERIOR PAINT
COLOR: SW7069 IRON ORE
(C) METALLIC WHITE DECORATIVE BROW
(D) METALLIC BLACK DECORATIVE BROW
(E) STOREFRONT
MEDIUM PERFORMANCE BLUE REFLECTIVE GLAZING & BLACK MULLIONS
(F) METAL PANEL
DRI DESIGN ALUMINUM MATTE BLACK
(G) SPRAY EXTERIOR PAINT
COLOR: SW7067 CITYSCAPE
(H) EXTERIOR LED LIGHT
COLOR: BLUE

NOTES:
1. PAINT MAN DOORS, STAIR & RAMP GUARD WALLS, GUARD RAILS, DOWN SPOUTS, & LOUVERS TO MATCH ADJACENT BUILDING WALL COLOR, U.O.N.
2. TRUCK DOORS TO BE PRE-FINISHED WITH MANUFACTURERS WHITE.

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EXTERIOR ELEVATIONS
A4

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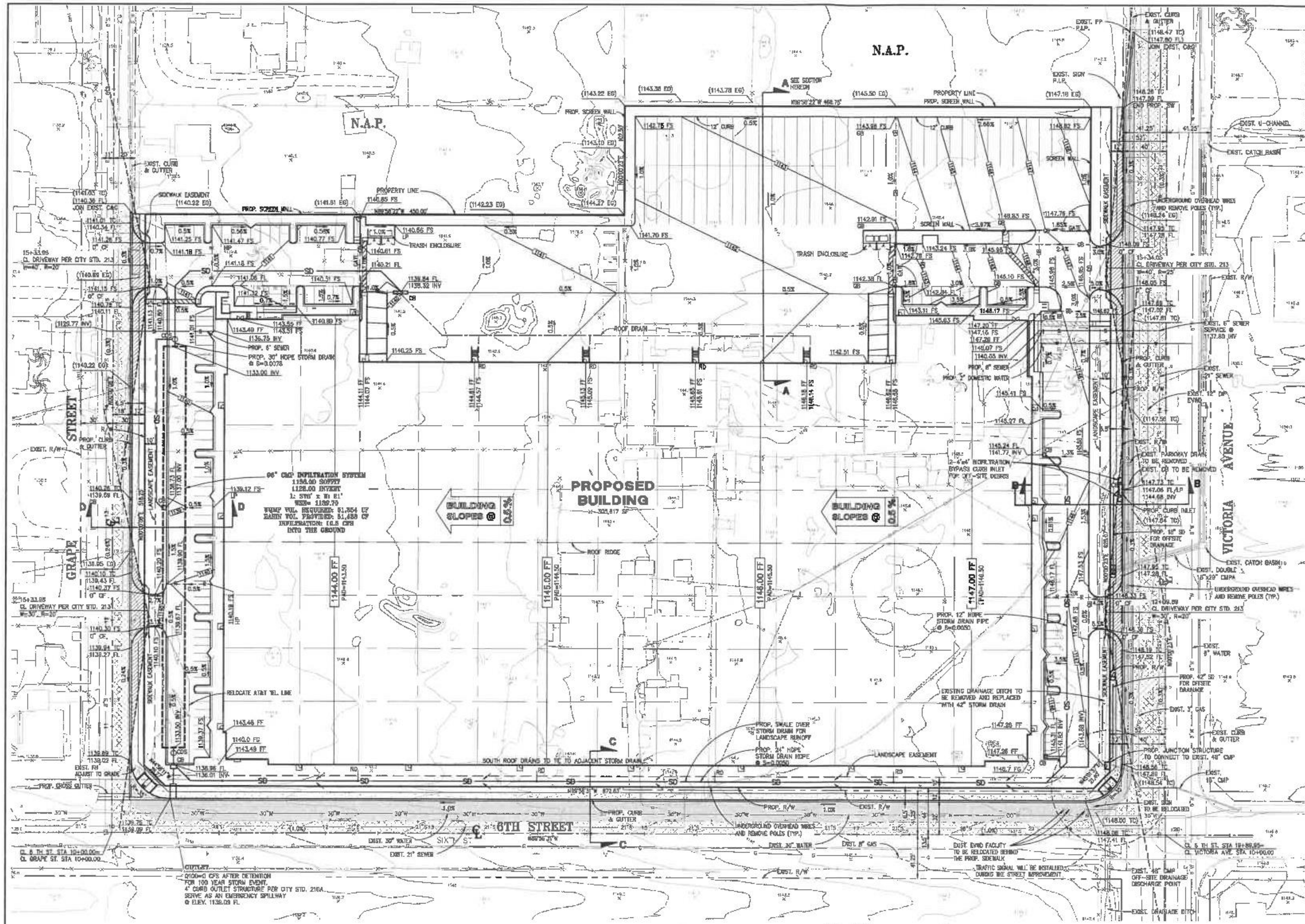
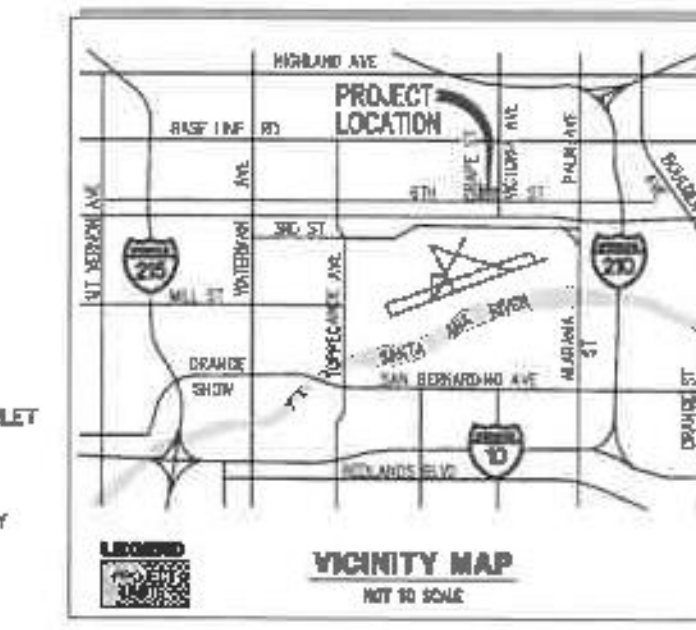


LEGEND

SD	PROPOSED STORM DRAIN
S	PROPOSED SEWER
W	PROPOSED WATER
GB	GRADE BREAK
R	RIDGE LINE
	PROPERTY LINE
	CL
	EXISTING R/W
	PROPOSED R/W
	LINE OF SIGHT
	LANDSCAPE EASEMENT
	PROPOSED CURB OPENING INLET
	PROPOSED STREET LIGHT
	PROPOSED AC/AB
	PROPOSED GRIND & OVERLAY
	CLEAR SIGHT TRIANGLE
CF	CURB FACE
CB	CATCH BASIN
C&G	CURB & GUTTER
CDS	CONTECH CDS UNIT
CL	CENTERLINE
DWY	DRIVEWAY
EXIST.	EXISTING
EG	EXISTING GROUND
FF	FINISHED FLOOR
FS	FINISHED SURFACE
FL	FLOWLINE
GB	GRADE BREAK
INV	INVERT
LA	LANDSCAPE AREA
LP	LOW POINT
LT.	LEFT
N.A.P.	NOT A PART
P.I.P.	PROTECT IN PLACE
PP	POWER POLE
PL	PROPERTY LINE
PROP.	PROPOSED
RD	ROOF DRAIN
RT.	RIGHT
R/W	RIGHT-OF-WAY
STD.	STANDARD
STL	STREET LIGHT
T.E.	TRASH ENCLOSURE
TP	TOP OF PAVEMENT
TC	TOP OF CURB
TG	TOP OF GRATE
EP	EDGE OF PAVEMENT
WSE	WATER SURFACE ELEVATION



EARTHWORK VOLUMES

	CUT (CY)	FILL (CY)
RAW	18,300	12,976
OVEREXCAVATION	34,988	34,988
SUBTOTAL	53,288	47,964
SHRINKAGE 10%	-5,329	–
SUBSIDENCE 0.1'	–	1,953
SPOILS	1,800	–
TOTAL	49,759	49,947

188 CY SHORT

NOTE:
EARTHWORK ESTIMATE IS PRELIMINARY AND BASED ON CONCEPTUAL DESIGN ONLY AND TAKES INTO ACCOUNT PRELIMINARY SOILS PARAMETERS PROVIDED BY THE SOILS ENGINEER. ADJUSTMENTS MAY BE REQUIRED BASED ON FINAL DESIGN OF SITE PAVING THICKNESS. ADDITIONAL ADJUSTMENTS MAY BE REQUIRED BASED ON SITE SOIL CHARACTERISTICS EXPERIENCED DURING CONSTRUCTION.

LEGAL DESCRIPTION

ALL THAT CERTAIN REAL PROPERTY SITUATED IN THE COUNTY OF SAN BERNARDINO, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS:

PARCEL A:

PORTIONS OF LOTS 4 AND 5 OF CUNNINGHAM'S SUBDIVISION, AS PER PLAT RECORDED IN BOOK 2, PAGE 22 OF MAPS, RECORDS OF SAN BERNARDINO COUNTY, DESCRIBED AS FOLLOWS:

COMMENCING AT A POINT ON THE WEST LINE OF PEPPER AVENUE EXTENDED NORTHERLY 10 FEET FROM THE INTERSECTION OF SAID WEST LINE OF SAID AVENUE WITH SOUTH LINE OF CYPRESS STREET, AS SHOWN ON SAID MAP; THENCE SOUTH ALONG WEST LINE OF PEPPER AVENUE 615 FEET FOR TRUE POINT OF BEGINNING; THENCE WEST 468.75 FEET; THENCE SOUTH 205 FEET TO POINT 480 FEET NORTH OF THE SOUTH LINE OF LOT 4 OF SAID SUBDIVISION; THENCE 468.75 FEET TO THE WEST LINE OF PEPPER AVENUE; THENCE NORTH 205 FEET TO THE POINT OF BEGINNING.

EXCEPTING THEREFROM ANY PORTION OF SAID LAND LYING WITHIN VICTORIA STREET.

APN: 1192-281-09-0-000

PARCEL B:

THAT PORTION OF LOT 5, ACCORDING TO MAP OF CUNNINGHAM SUBDIVISION, IN THE CITY OF HIGHLAND, COUNTY OF SAN BERNARDINO, STATE OF CALIFORNIA, AS PER PLAT RECORDED IN BOOK 2, PAGE 22 OF MAPS, RECORDS OF SAID COUNTY, DESCRIBED AS FOLLOWS:

COMMENCING AT THE NORTHEAST CORNER OF LOT 6, SAID SUBDIVISION, THENCE SOUTH ALONG THE EAST LINE OF SAID LOTS 6 AND 5, 610 FEET FROM THE TRUE POINT OF BEGINNING; THENCE WEST 468.75 FEET; THENCE SOUTH 480 FEET TO THE SOUTH LINE OF SAID LOT 5; THENCE EAST ALONG THE SOUTH LINE OF LOT 5, 125.46 FEET TO THE MOST WESTERLY CORNER OF LAND CONVEYED TO SAN BERNARDINO ARROWHEAD AND WATERMAN RAILROAD COMPANY, BY DEED RECORDED IN BOOK 98, PAGE 170 DEEDS; THENCE NORTHEASTERLY ALONG THE NORTHWESTERLY LINE OF SAID PROPERTY SO CONVEYED TO SAN BERNARDINO ARROWHEAD AND WATERMAN RAILROAD COMPANY, 478 FEET TO A POINT IN THE EAST LINE OF SAID LOT 5; THENCE NORTH ALONG THE EAST LINE OF SAID LOT 5 TO THE POINT OF BEGINNING.

EXCEPTING FROM THE ABOVE DESCRIBED PROPERTY THAT PORTION OF LOT 5 WHICH WAS CONVEYED TO DONALD R. PESSENDEN AND WIFE, BY DEED RECORDED AUGUST 11, 1942 IN BOOK 1549, PAGE 313 OFFICIAL RECORDS, DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT IN THE SOUTH LINE OF LOT 4, 468.75 FEET WEST OF THE EAST LINE OF SAID LOT 5 AS SHOWN ON SAID PLAT; THENCE NORTH 320 FEET; THENCE EAST 80 FEET; THENCE SOUTH 320 FEET TO THE SOUTH LINE OF LOT 5; THENCE WEST ALONG SAID SOUTH LINE TO THE POINT OF BEGINNING.

ALSO EXCEPTING THEREFROM THAT PORTION THEREOF LYING WITHIN RATHBURN STREET.

AREAS AND DISTANCES OF THE ABOVE DESCRIBED PROPERTY ARE COMPUTED TO THE CENTER OF ADJOINING STREETS.

APN: 1192-281-10-0-000

PARCEL C:

THAT PORTION OF LOTS 4 AND 5, CUNNINGHAM SUBDIVISION OF A PORTION OF BLOCKS 52 AND 63, RANCHO SAN BERNARDINO, IN THE CITY OF HIGHLAND, COUNTY OF SAN BERNARDINO, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 2, PAGE 22 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT ON THE SOUTH LINE OF SAID LOT 4, 468.75 FEET WEST OF THE EAST LINE OF SAID LOT 5, AS SHOWN ON SAID PLAT; THENCE NORTH 320 FEET; THENCE EAST 80 FEET; THENCE SOUTH 320 FEET TO THE SOUTH LINE OF SAID LOT 5; THENCE WEST ALONG THE SOUTH LINES OF SAID LOTS 5 AND 4 TO THE POINT OF BEGINNING.

APN: 1192-281-11-0-000

PARCEL D:

PARCEL 2 OF PARCEL MAP 5024, IN THE CITY OF HIGHLAND, COUNTY OF SAN BERNARDINO, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 64, PAGE 72 OF PARCEL MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 1192-281-14-0-000

PARCEL E:

PARCEL 1 OF PARCEL MAP 5024, IN THE CITY OF HIGHLAND, COUNTY OF SAN BERNARDINO, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 64, PAGE 72 OF PARCEL MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

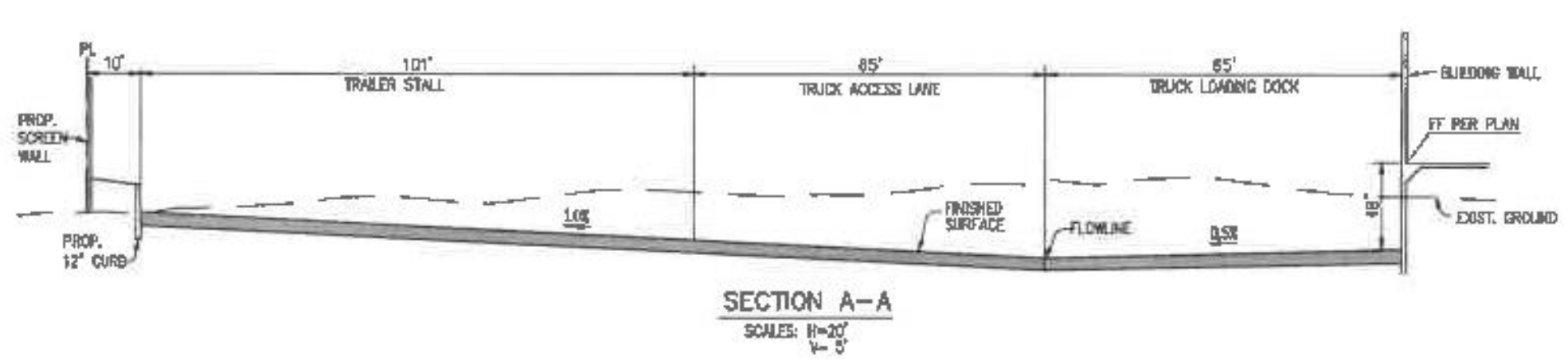
APN: 1192-281-13-0-000

PARCEL F:

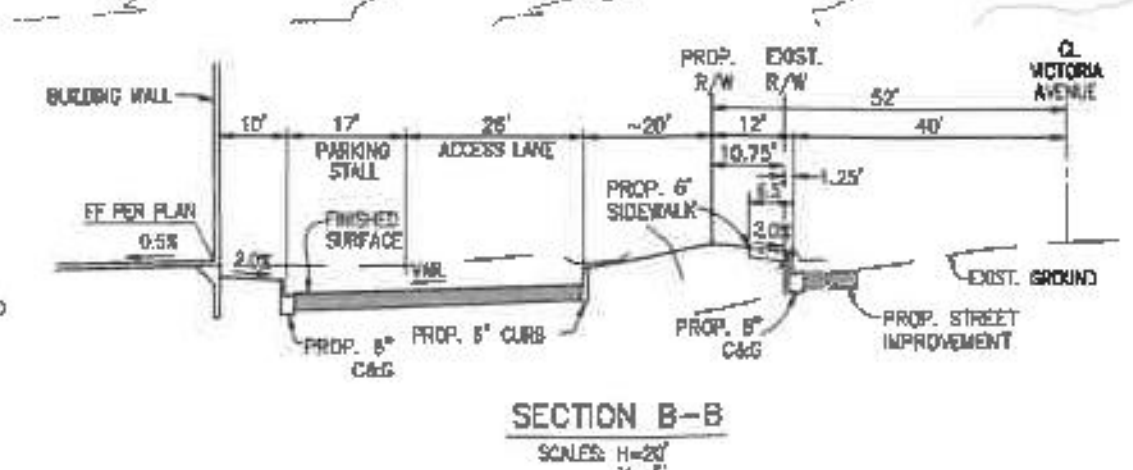
ALL THAT PORTION OF LOT 1, BLOCK 62, OF THE RANCHO SAN BERNARDINO, AS PER MAP RECORDED IN BOOK 7, PAGE 2 OF MAPS, RECORDS OF SAID COUNTY, AS SAID PORTION WAS DESCRIBED IN THAT CERTAIN DOCUMENT TO THE SAN BERNARDINO, ARROWHEAD AND WATERMAN RAILROAD COMPANY, BY DEED RECORDED IN BOOK 98, PAGE 170 OF DEEDS, IN THE OFFICE OF THE RECORDER OF SAN BERNARDINO COUNTY, DESCRIBED AS FOLLOWS:

COMMENCING AT A POINT ON THE WEST BOUNDARY LINE OF PEPPER AVENUE, THIRTY-FIVE HUNDRED AND THIRTY-SIX AND NINE-TENTHS (3536 9/10) FEET SOUTH OF THE NORTHEAST CORNER OF SAID BLOCK SIXTY-TWO (62), THENCE RUNNING SOUTH THREE HUNDRED AND THIRTY-THREE FEET TO A STREET EIGHTY (80) FEET WIDE, THENCE RUNNING WEST THREE HUNDRED AND FORTY-THREE (343) FEET; THENCE RUNNING NORTHEASTERLY FOUR HUNDRED AND SEVENTY-EIGHT (478) FEET MORE OR LESS TO A PLACE OF BEGINNING

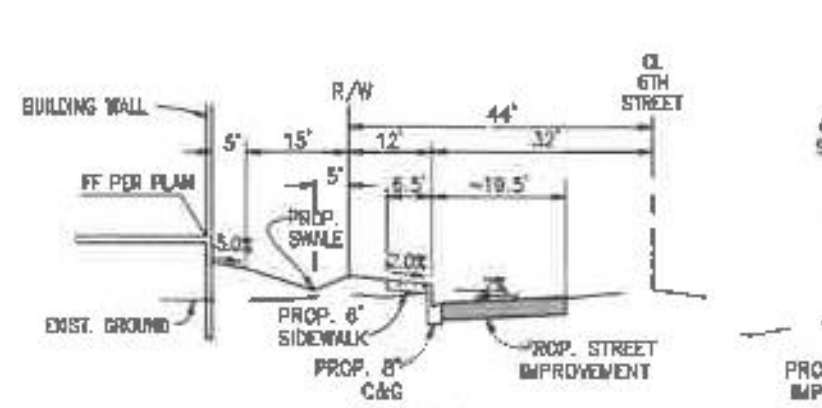
APN: 1192-281-12-0-000



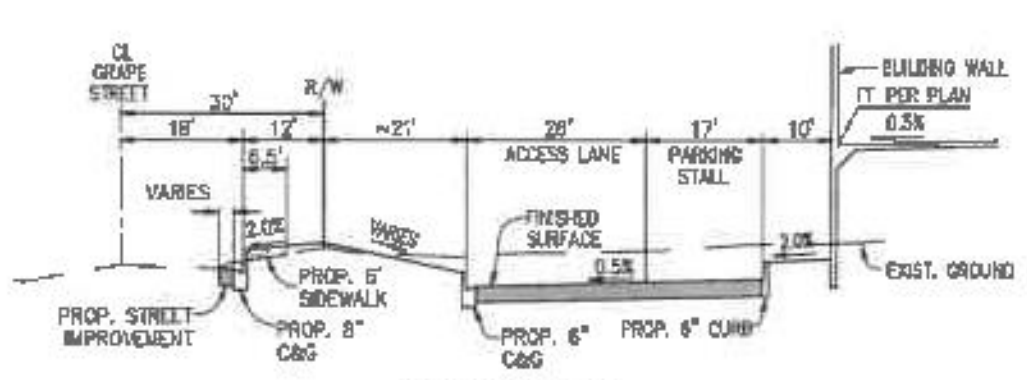
SECTION A-A
SCALES: H=20' V=5'



SECTION B-B
SCALES: H=20' V=5'



SECTION C-C
SCALES: H=20' V=5'



SECTION D-D
SCALES: H=20' V=5'

ARCHITECTURE
HERDMAN
16201 SCIENTIFIC WAY
IRVINE, CALIFORNIA 92618
PHONE: (949) 525-7572
CONTACT: KEVIN ALCANTRA

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3990 CONCOURS, SUITE 330
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PHONE: (909) 941-7799
CONTACT: RYAN PENG

OWNER
PATRIOT DEVELOPMENT PARTNERS
12128 W.SUNSET BLVD.
LOS ANGELES, CA 90049
PHONE: 858-952-4134
CONTACT: KEVIN RICE

SCALE 1" = 40'

BENCH MARK
BENCHMARK: S 1418
ELEVATION = 1101.16'
2.65 MI EAST ALONG 3RD STREET FROM THE SAN BERNARDINO COUNTY COURTHOUSE IN SAN BERNARDINO, 0.10 MI WEST OF STERLING AVENUE, IN TOP AND 1.0 FT WEST OF THE EAST END OF THE NORTH HEADWALL OF A DOUBLE-BOX CULVERT UNDER THE STREET, 32.0 FT NORTH OF THE WESTBOUND LANES CENTERLINE

BASIS OF BEARING
BASIS OF BEARINGS: BEARINGS SHOWN HEREON ARE BASED ON THE CENTERLINE OF CYPRESS STREET BEING NORTH 89°38'22" WEST ON PARCEL MAP 5024, P.M.B. 64/72.

CONCEPTUAL GRADING PLAN FOR 6TH AND VICTORIA INDUSTRIAL

CITY OF HIGHLAND

HUITT-ZOLLARS
HUITT-ZOLLARS, INC.
3990 CONCOURS, SUITE 330 • ONTARIO, CALIFORNIA 91764 • (909) 941-7799

DESIGNED BY	R.P.
DRAWN BY	R.P.
CHECKED BY	D.W.
RED BOOK	
SHEET	1 OF 1 SHEETS
JOB NO.	317698.01

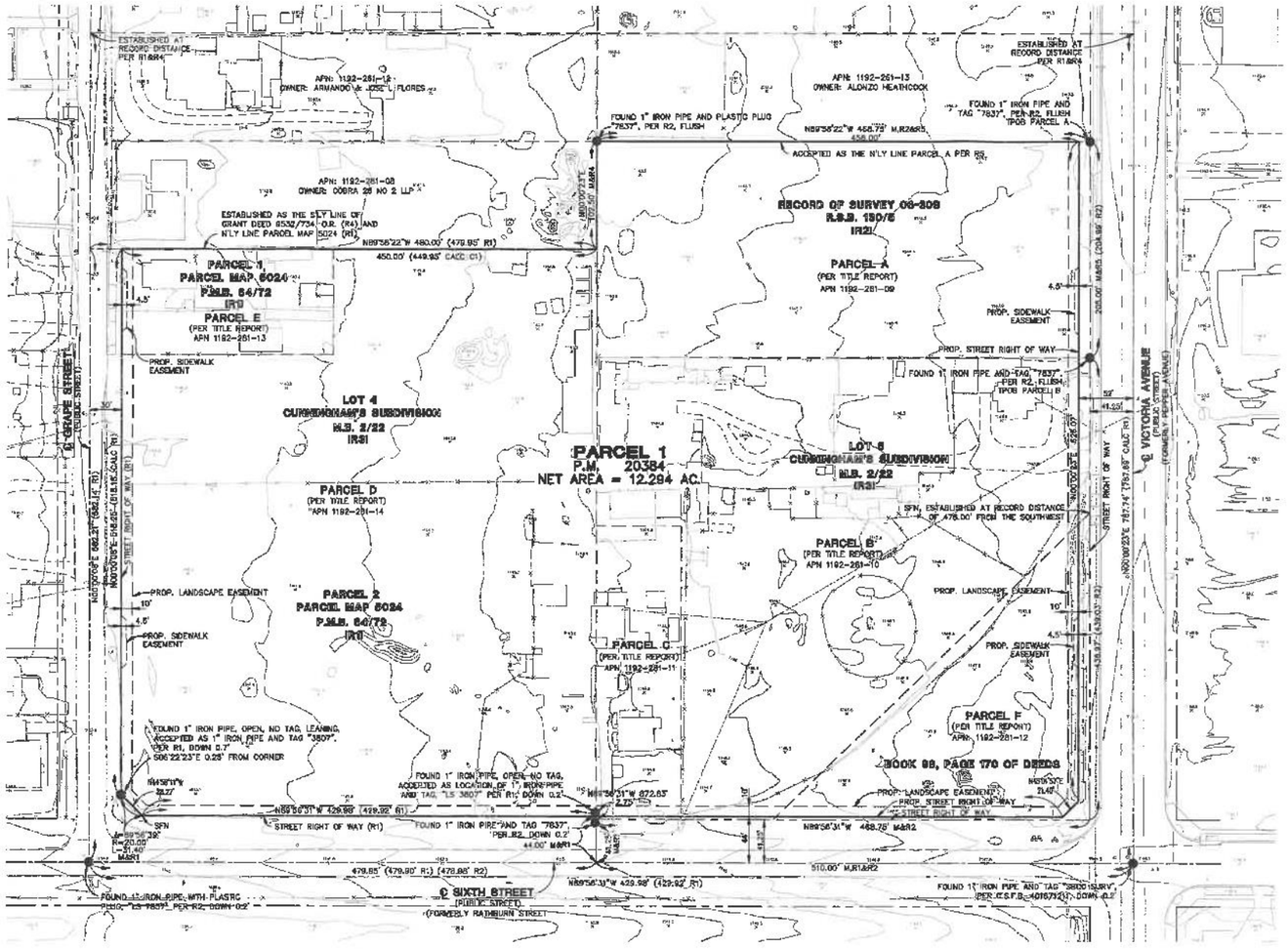
H:\proj\R317698.01 - Patriot - 6th at Grape Industrial\03 Design\03.1 DWG's\conceptual grading\CONGrading, Layout1, Aug 12 2021 3:38pm

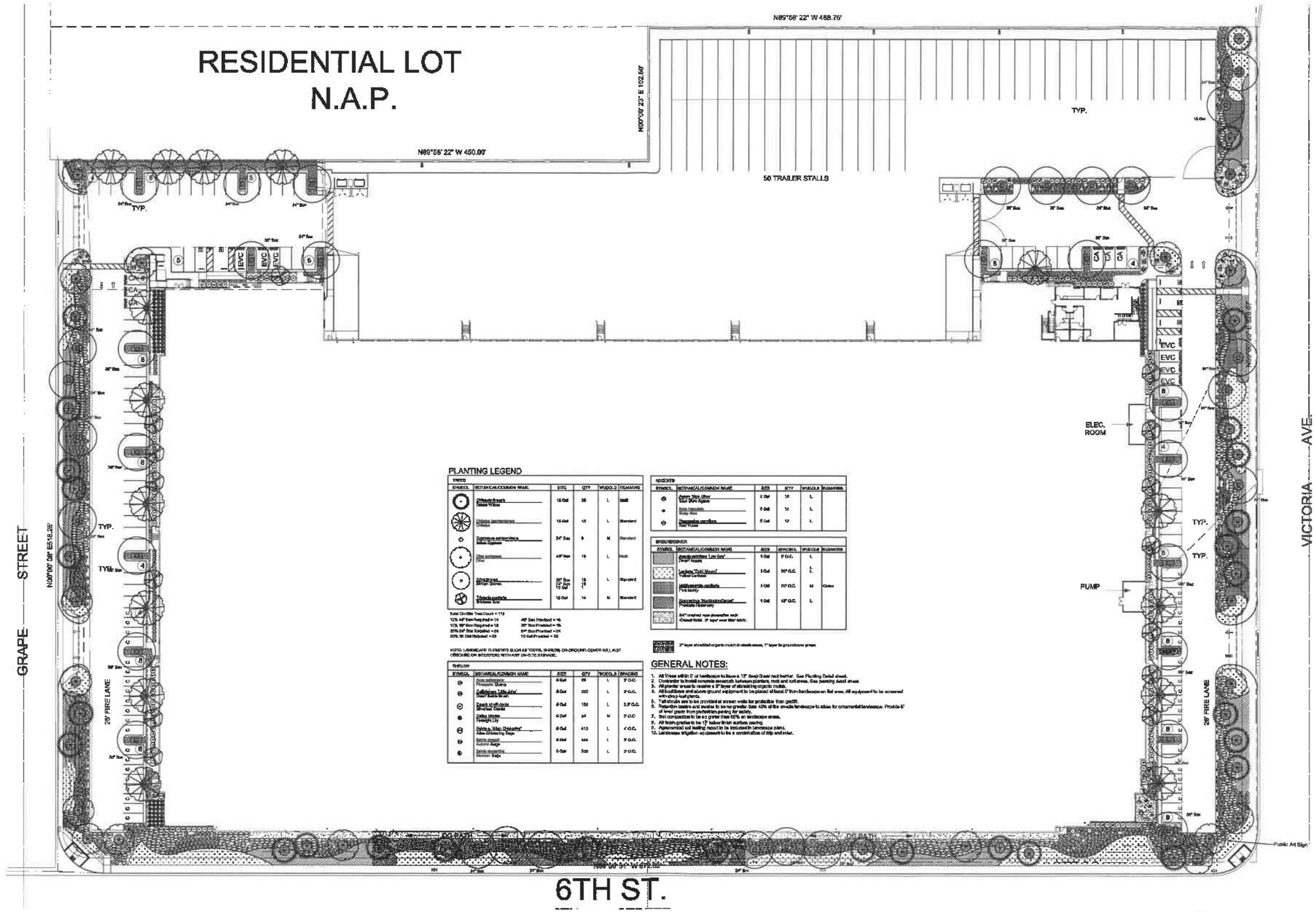
TENTATIVE PARCEL MAP NO. 20384

IN THE CITY OF HIGHLAND, COUNTY OF SAN BERNARDINO, STATE OF CALIFORNIA

HUITT-ZOLLARS

AUGUST 2021


PARCEL 1
P.M. 20384
NET AREA = 12.284 AC.
PARCEL 1
PARCEL MAP 5024
P.M.B. 64/72
(R1)
PARCEL E
(PER TITLE REPORT)
APN 1192-251-13
PARCEL 2
PARCEL MAP 5024
P.M.B. 64/72
(R1)
PARCEL D
(PER TITLE REPORT)
"APN 1192-251-14
PARCEL A
(PER TITLE REPORT)
APN 1192-251-09
PARCEL B
(PER TITLE REPORT)
APN 1192-251-10
PARCEL C
(PER TITLE REPORT)
APN 1192-251-11
PARCEL F
(PER TITLE REPORT)
APN 1192-251-12
LOT 4
CUNNINGHAM'S SUBDIVISION
M.B. 2/22
(R3)
LOT 5
CUNNINGHAM'S SUBDIVISION
M.B. 2/22
(R3)
RECORD OF SURVEY 06-306
R.S.B. 130/6
(R2)
BOOK 98, PAGE 170 OF DEEDS
APN: 1192-251-08
OWNER: COBRA 28 NO 2 LLP
APN: 1192-251-12
OWNER: ARMANDO & JOSE L. FLORES
APN: 1192-251-13
OWNER: ALONZO HEATHCOCK
ESTABLISHED AS THE S'LY LINE OF GRANT DEED 6532/734, O.R. (R4) AND N'LY LINE PARCEL MAP 5024 (R1)
ESTABLISHED AT RECORD DISTANCE PER R1&R4
ACCEPTED AS THE N'LY LINE PARCEL A PER R2
FOUND 1" IRON PIPE AND PLASTIC PLUG "7837", PER R2, FLUSH
FOUND 1" IRON PIPE AND TAG "7837", PER R2, FLUSH "POB PARCEL A"
N89°56'22"W 468.75' M,R2&R5
456.00'
N89°56'31"W 468.78' M&R2
450.00' (449.95' CALC. C1)
N89°56'22"W 480.00' (479.85' R1)
PROP. STREET RIGHT OF WAY
PROP. SIDEWALK EASEMENT
PROP. LANDSCAPE EASEMENT
FOUND 1" IRON PIPE AND TAG "7837", PER R2, FLUSH "POB PARCEL B"
SFN, ESTABLISHED AT RECORD DISTANCE OF 478.00' FROM THE SOUTHWEST
FOUND 1" IRON PIPE, OPEN, NO TAG, LEANING. ACCEPTED AS 1" IRON PIPE AND TAG "3807". PER R1, DOWN 0.7' & S06°22'23"E 0.28' FROM CORNER
FOUND 1" IRON PIPE, OPEN-NO TAG, ACCEPTED AS LOCATION OF 1" IRON PIPE AND TAG "LS 3807" PER R1, DOWN 0.2'
FOUND 1" IRON PIPE AND TAG "7837", PER R2, DOWN 0.2'
N89°56'31"W 872.63'
2.75'
N89°56'31"W 429.98' (429.92' R1)
STREET RIGHT OF WAY (R1)
479.85' (479.80' R1) (478.88' R2)
N89°56'31"W 439.98' (429.92' R1)
510.00' M,R1&R2
FOUND 1" IRON PIPE AND TAG "3807 LS/RV", PER R.C.S.B. 4016/151, DOWN 0.2'
FOUND 1" IRON PIPE, WITH PLASTIC PLUG "LS 7857", PER R2, DOWN 0.2'
℄ SIXTH STREET
(PUBLIC STREET)
(FORMERLY RATHBURN STREET)
℄ VICTORIA AVENUE
(PUBLIC STREET)
(FORMERLY PEPPER AVENUE)
℄ CYPRESS STREET
(PUBLIC STREET)
N00°00'00"E 662.21' (662.12' R1)
STREET RIGHT OF WAY (R1)
N00°00'23"E 737.74' (737.69' CALC'D M)
N00°00'23"E 226.00'
R=20.00'
51.40'
M&R1
S06°22'23"E 0.28' FROM CORNER
S89°56'39"E 22.27'
S89°56'39"E 21.40'
S06°22'23"E 0.28'
S89°56'39"E 21.40'
S89°56'39"E 22.27'
S89°56'39"E 20.00'
S89°56'39"E 51.40



PLANTING LEGEND

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
TREES					
	Chitalpa tashkentensis 'Pink Dawn'	15 Gal	38	L	Multi
	Chitalpa tashkentensis	15 Gal	13	L	Standard
	Dypsis decaryi	24" Box	9	M	Standard
	Pinus eldarica	48" Box	19	L	Multi
	Tipuana tipu	36" Box 24" Box 15 Gal	19 19 1	L	Standard
	Ulmus parvifolia 'Athena'	15 Gal	14	M	Standard

Total On-Site Tree Count = 113
10% 48" Box Required = 11 — 48" Box Provided = 16
10% 36" Box Required = 18 — 36" Box Provided = 19
20% 24" Box Required = 24 — 24" Box Provided = 24
50% 15 Gal Required = 56 — 15 Gal Provided = 56

NOTE: LANDSCAPE ELEMENTS SUCH AS TREES, SHRUBS OR GROUND COVER WILL NOT OBSCURE OR INTERFERE WITH ANY ON-SITE SIGNAGE.

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	SPACING
	Acacia redolens 'Low Boy'	5 Gal	69	L	3' O.C.
	Carissa macrocarpa 'Green Carpet'	5 Gal	220	L	3' O.C.
	Cistus x hybridus 'White Cistus'	5 Gal	152	L	3.5' O.C.
	Dietes bicolor 'Lemon Drop'	5 Gal	94	M	3' O.C.
	Dietes iridioides 'Katy Did'	5 Gal	413	L	4' O.C.
	Salvia greggii 'Autumn Sage'	5 Gal	444	L	3' O.C.
	Salvia greggii 'Maraschino'	5 Gal	702	L	3' O.C.

ACCENTS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Agave 'Blue Glow'	5 Gal	14	L	
	Aloe ferox	5 Gal	14	L	
	Dasylirion wheeleri	5 Gal	12	L	

BRUSH/GROWER

SYMBOL	BOTANICAL/COMMON NAME	SIZE	SPACING	WUCOLS	REMARKS
	Agave parryana 'Low Boy'	1 Gal	3' O.C.	L	
	Leucophyllum 'Cleo'	5 Gal	30" O.C.	L	
	Muhlenbergia rigida	1 Gal	30" O.C.	M	Grass
	Quercus dumosa 'Nuttall's Scrub'	1 Gal	48" O.C.	L	

2" layer shredded organic mulch in shrub areas, 1" layer to groundcover areas.

GENERAL NOTES:

1. All trees within 5' of hardscape to have a 12" deep Root root barrier. See Planting Detail sheet.
2. Contractor to install concrete separator between planters, mulch and turf areas. See planting detail sheet.
3. All planter areas to receive a 3" layer of shredding organic mulch.
4. All backflow and above ground equipment to be placed at least 5' from hardscape on flat area. All equipment to be screened with shrub type plants.
5. Tall shrubs are to be provided at screen walls for protection from graffiti.
6. Protection basins and swales to be no greater than 40% of the shrub landscape to allow for ornamental landscape. Provide 6" of level grade from perimeter paving for safety.
7. Soil composition to be so grade than 50% on landscape areas.
8. All finish grades to be 1/2" below finish surface paving.
9. Agronomical soil testing report to be included in landscape plans.
10. Landscape irrigation equipment to be a combination of drip and rotor.

N

0 15' 30' 60'

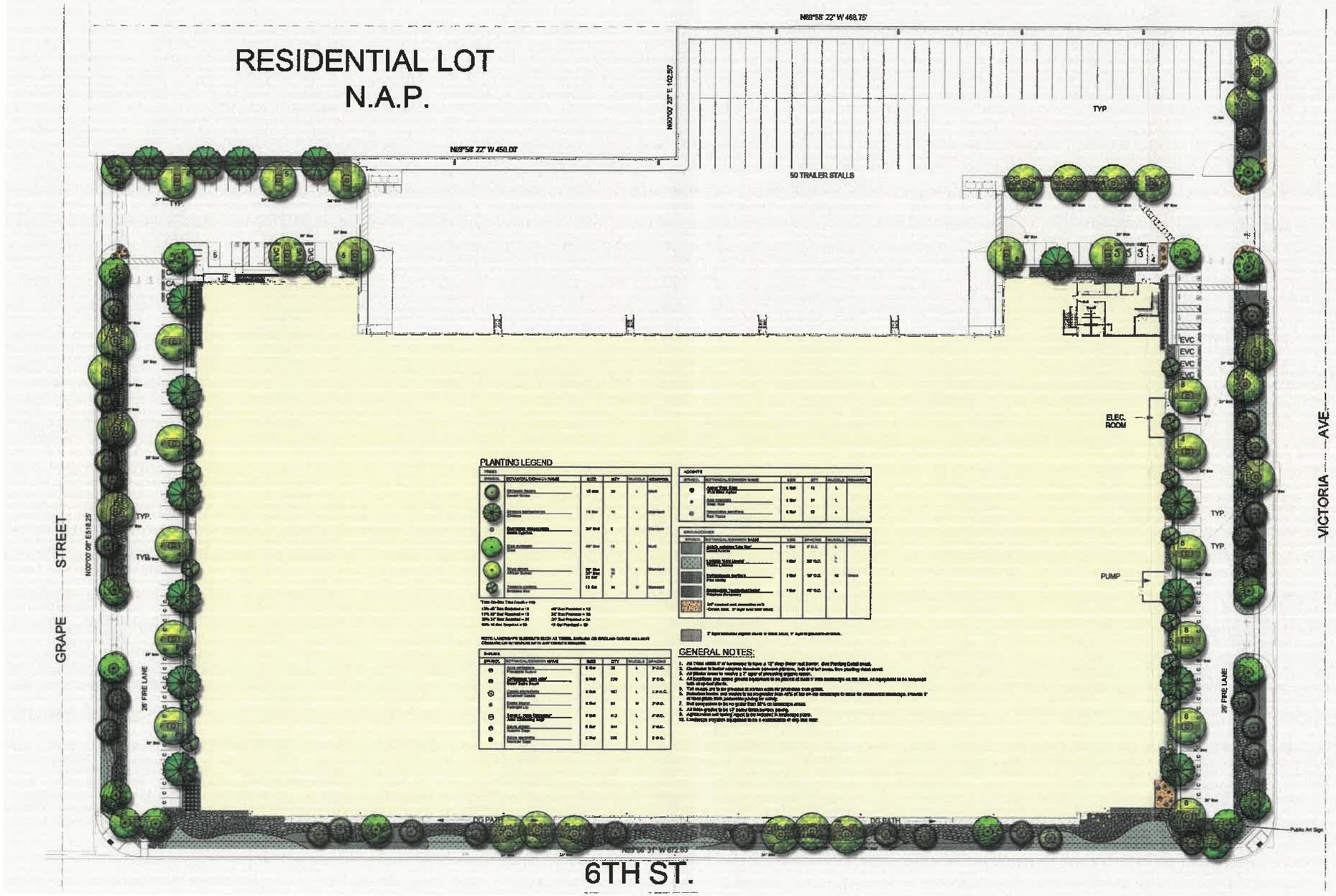
Victoria & 6th Street

21-082
06.03.21 11.05.21
07.30.21
10.11.21

Patriot Partners

Highland, California

HUNTER LANDSCAPE
711 FEE ANA STREET PLACENTIA, CA 92870
714.986.2400 FAX 714.986.2408



N

0 15 30 60'

Victoria & 6th Street

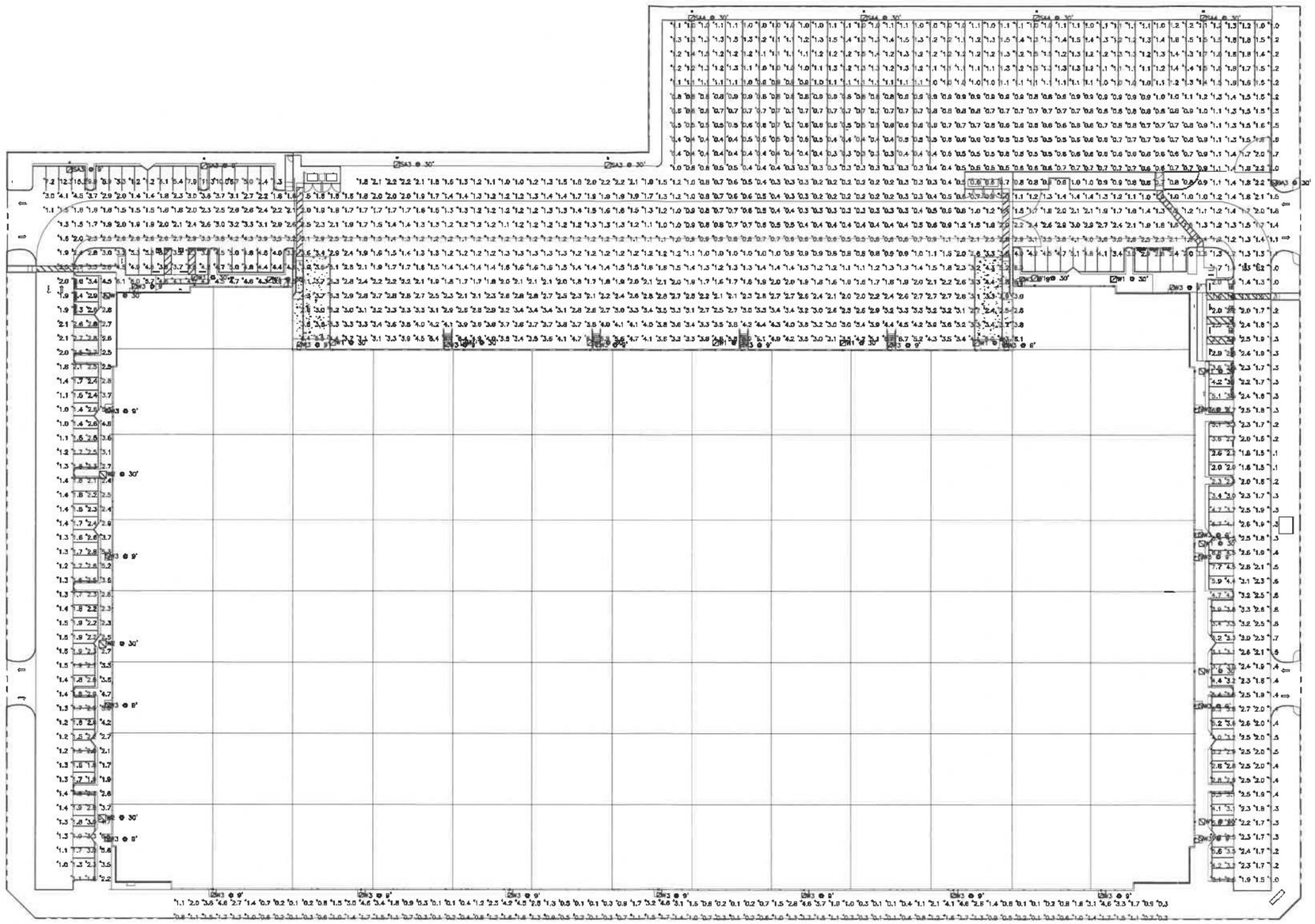
21-082
06.03.21 11.05.21
07.30.21
10.11.21

Patriot Partners

Highland, California

HUNTER LANDSCAPE
711 FEE ANA STREET PLACENTIA, CA 92870
714.986.2400 FAX 714.986.2408

PROJECT
PATRIOT PARTNERS 6TH AND VICTORIA
2ND PLANNING SUBMITTAL
HIGHLAND, CA



SITE PHOTOMETRIC STUDY

SCALE: 1"=30'-0" (1)

N

Schedule									
Symbol	Label	QTY	Manufacturer	Catalog Number	Description	Lamp	Number Lamps	Lumens per Lamp	LLF	Wattage
	W2	3	U.S. ARCHITECTURAL LIGHTING	RDS--FLED--II--W--RELED--4000K40--VW--MVOLT--WALL MT AT 20 FT AFG BLK PAINTED SS (x) C2	CAST BLACK PAINTED FINISH METAL HOUSING.	80 WHITE LIGHT EMITTING DIODES (LEDS), BARE UP.	80	2125	0.9	1339.4
	SA3	5	U.S. ARCHITECTURAL LIGHTING	RDS--FLED--II--S--RELED--4000K40--VW--MVOLT--SPA11 POLE MT AT 30 BUT AFG 27.5 FT POLE 30 IN DIA BLC PAINTED SS (x) C2	CAST BLACK PAINTED FINISH METAL HOUSING.	80 WHITE LIGHT EMITTING DIODES (LEDS), BARE UP.	80	167	0.9	1339.4
	W1	12	U.S. ARCHITECTURAL LIGHTING	RDS--FLED--IV--RELED--700mA--VW--MVOLT--SQ 120 C2 WALL MT AT 20 FT AFG	CAST BLACK PAINTED FINISH METAL HOUSING.	80 WHITE LIGHT EMITTING DIODES (LEDS), BARE UP.	80	2910	0.9	1723.6
	SA4	4	U.S. ARCHITECTURAL LIGHTING	RDS--FLED--II--RT--RELED--4000K40--VW--MVOLT SPA11 POLE MT AT 20 FT AFG ON 7FT POLE 4 FT BASE BLK PAINTED SS (x) C2	CAST BLACK PAINTED FINISH METAL HOUSING.	80 WHITE LIGHT EMITTING DIODES (LEDS), BARE UP.	80	1180	0.9	1339.4
	W3	25	U.S. ARCHITECTURAL LIGHTING	RDS--SELF--FLED--II--W--RELED--4000K40--VW--EM1 BLK PAINTED SS (x) C2 WALL MT AT 8 FT AFG	CAST BLACK PAINTED FINISH METAL HOUSING.	20 WHITE LIGHT EMITTING DIODES (LEDS), BARE UP.	20	2110	0.9	33.4

Statistics						
Description	Symbol	Avg	Max	Min	Max/Min	Avg/Min
Calc Zone #1	+	1.3 fc	4.8 fc	0.1 fc	48.0:1	13.0:1
Calc Zone #2	+	2.0 fc	18.2 fc	0.3 fc	70.0:1	10.0:1

HERDMAN
ARCHITECTURE + DESIGN

RPM
engineers inc.
828 DISCOVERY
IRVINE, CA 92618
Tel: 949-428-8888
Fax: 949-428-8844
Contact: Kevin To
e-mail: kevin@rpmpe.com

REGISTERED PROFESSIONAL ENGINEER
KAR V. HOUNSEL
No. 015990
Exp. 12-31-2021
ELECTRICAL
STATE OF CALIFORNIA
08/04/2021

SITE PHOTOMETRIC STUDY

FC-1

RPM #21-405 08/04/21

Plant Sample Profiles

Trees:



Chilopsis linearis

Common Name: Desert Willow

Deciduous tree

Color: Medium to gray leaves with orchid like flowers from pink to rose

Growth Pattern: Rapid

Height: 15'-30 feet Spread: 10'-20' feet

Water Use: Low



Chitalpa tashkentensis

Common Name: Chitalp

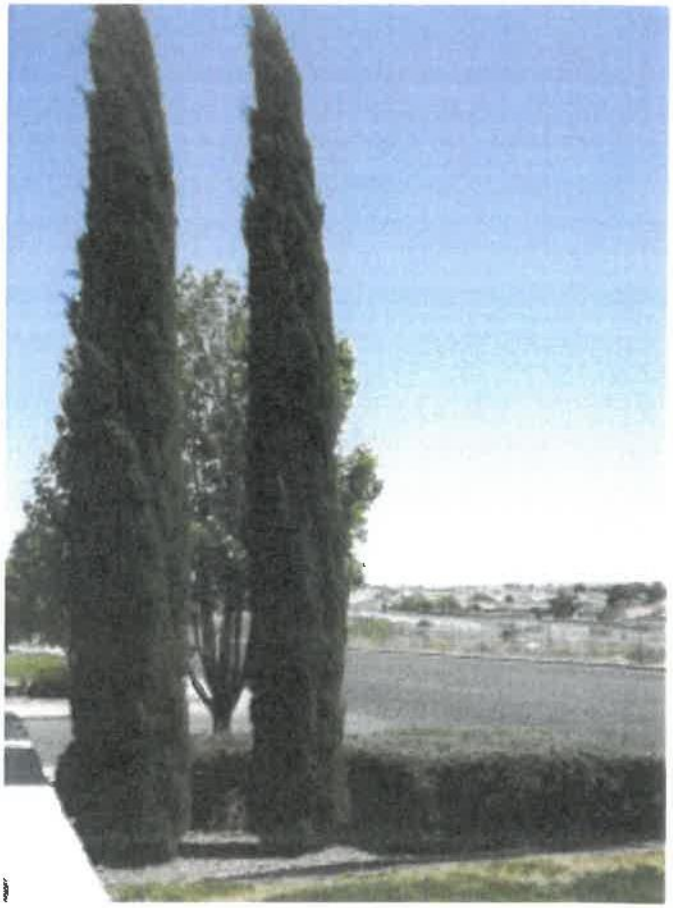
Deciduous tree

Color: Medium green leaves with lacey pink flowers

Growth Pattern: Rapid

Height: 20'-30 feet Spread: 20'-30' feet

Water Use: Low



CUPRESSUS SEMPERVIRENS

Plant Name: Italian Cypress

Colors: Dark green foliage

Growing Patterns: Evergreen columnar

Typical Applications: Vertical accent tree

Height: to 60 feet, spreading 4 feet



Olea europaea

Common Name: Olive

Evergreen tree

Color: Grey-green willow-like leaf and fruit

Growth Rate: Dense dome shaped and evergreen

Height: 30 feet Spread: 30 feet

Water Use: Moderate



Rhus lancea
Common Name: African Sumac
Evergreen tree
Color: Dark green leaves, spring flowers followed by clusters of pea-sized yellow or red fruit
Growth Pattern: Slow
Height: 20-30 feet Spread: 20-30 feet
Water Use: Low



Tristania conferta

Common Name: Brisbane Box

Evergreen tree

Color: Dark green foliage, shedding bark, in summer white to creamy white ¾ inch clusters of 3 – 7 flowers

Growth Pattern: Fast, upright, eventually a broad rounded crown

Height: 30-40 feet, spreading 15-20 feet

Water Use: Low

Shrubs:



Callistemon 'Little John'

Common Name: Dwarf Bottlebrush

Evergreen shrub

Color: Blood red flowers medium green leaves

Growth Pattern: Fast Low hedge or mat

Height: 3 feet, spreading 3 feet

Water Use: Low



Dietes bicolor

Common Name: Fortnight Lily

Evergreen shrub

Color: Dark Green Strap leaf with white and purple lily-like flowers

Growth: Fast

Height: 2-3 feet, Spread: 2-3 feet

Water Use: Low



Salvia greggii

Common Name: Autumn Sage

Evergreen shrub

Color: Deep purplish red flowers, hairy glossy green stems Growth Pattern: Fast

Height: 1-4 feet, Spread: 1-4 feet

Water Use: Low



Salvia leucantha

Common Name: Mexican Sage

Evergreen shrub

Color: Deep purplish flowers, hairy gray-green foliage

Growth Pattern: Fast

Height: 4 feet, Spread: 4 feet

Water Use: Low

Accents:



Agave 'Blue Glow'

Common Name: Blue Glow Agave

Succulent

Color: Blue Green with red / yellow margins

Growth Pattern: Moderate/Clumping

Height: 2' Width: 3'

Water Use: Low



Aloe maculata

Common Name: Soap Aloe

Evergreen shrub

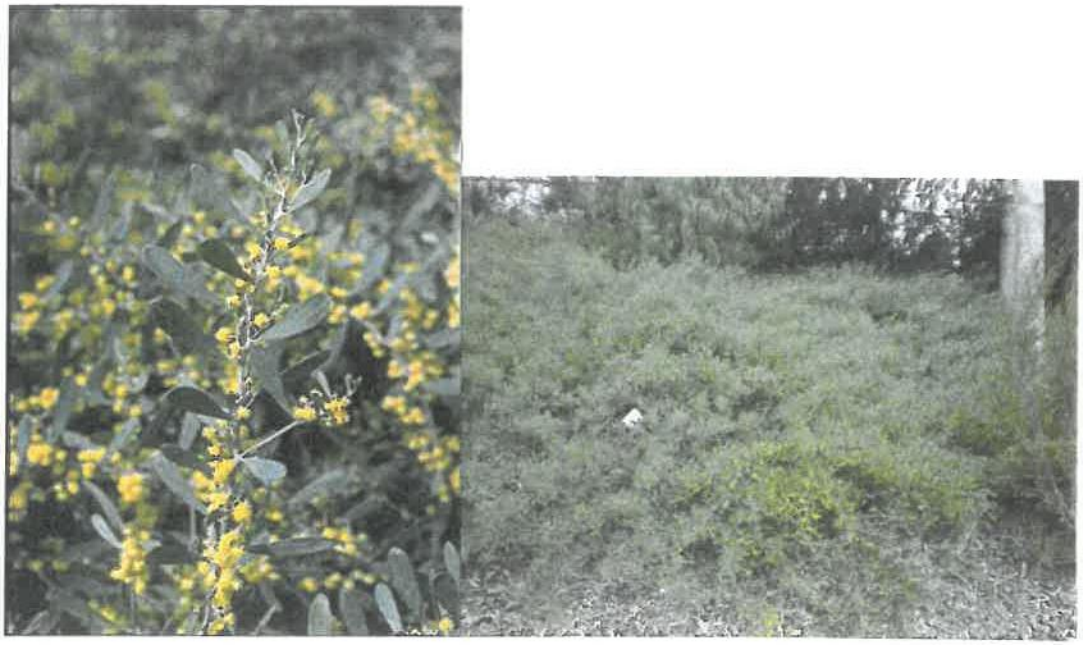
Color: Gray green

Growth Rate: Moderate

Height: 1.5 feet, Spread: 2 feet

Water Use: Low

Groundcovers:



Acacia redolens 'Low Boy'

Common Name: Trailing Acacia

Evergreen Groundcover

Color: Gray green, puffy yellow balls

Growth Rate:Fast

Height: 1-2 feet, Spread: 8 feet

Water Use: Low



Lantana c. 'Gold Mound'

Common Name: Lantana

Evergreen Groundcover

Color: **Bright yellow flowers and green leaves**

Growth Rate: Fast

Height: 2 feet, Spread: 3-6 feet

Water Use: Low



Muhlenbergia capillaris

Common Name: Pink Muhly

Ornamental grass

Color: Bright green leaves

Growth Rate: Fast

Height: 4 feet, Spread: 4 feet

Water Use: Low



Rosmarinus o. 'Prostratus'

Common Name: Prostrate Rosemary

Evergreen groundcover

Color: **Leaf dark green above and grayish underneath. Lavender-blue flowers**

Growth Rate: Moderate

Height: 2 feet, Spread: 4-8 feet

Water Use: Low

Attachment 10

Parking Study

605 THIRD STREET
ENCINITAS, CALIFORNIA 92024
T 760.942.5147 F 760.632.0164

MEMORANDUM

To:	Kim Stater, City of Highland
From:	Amanda Meroux, EIT, Assistant Transportation Engineer Dennis Pascua, Transportation Services Manager
Subject:	Parking Study for the 6th Street/Victoria Avenue Warehouse Project, City of Highland
Date:	July 22, 2021
cc:	Sean Kilkenny, Senior Project Manager
Attachment(s):	Attachment A – Site Plan Attachment B – Parking Ratios at Other Patriot Developments Attachment C – Raw Driveway Counts Attachment D – Parking Demand Worksheets

The following parking study has been prepared for the proposed 6th Street/Victoria Avenue Warehouse project (project) in the City of Highland (City). Figure 1 illustrates the regional and project location.

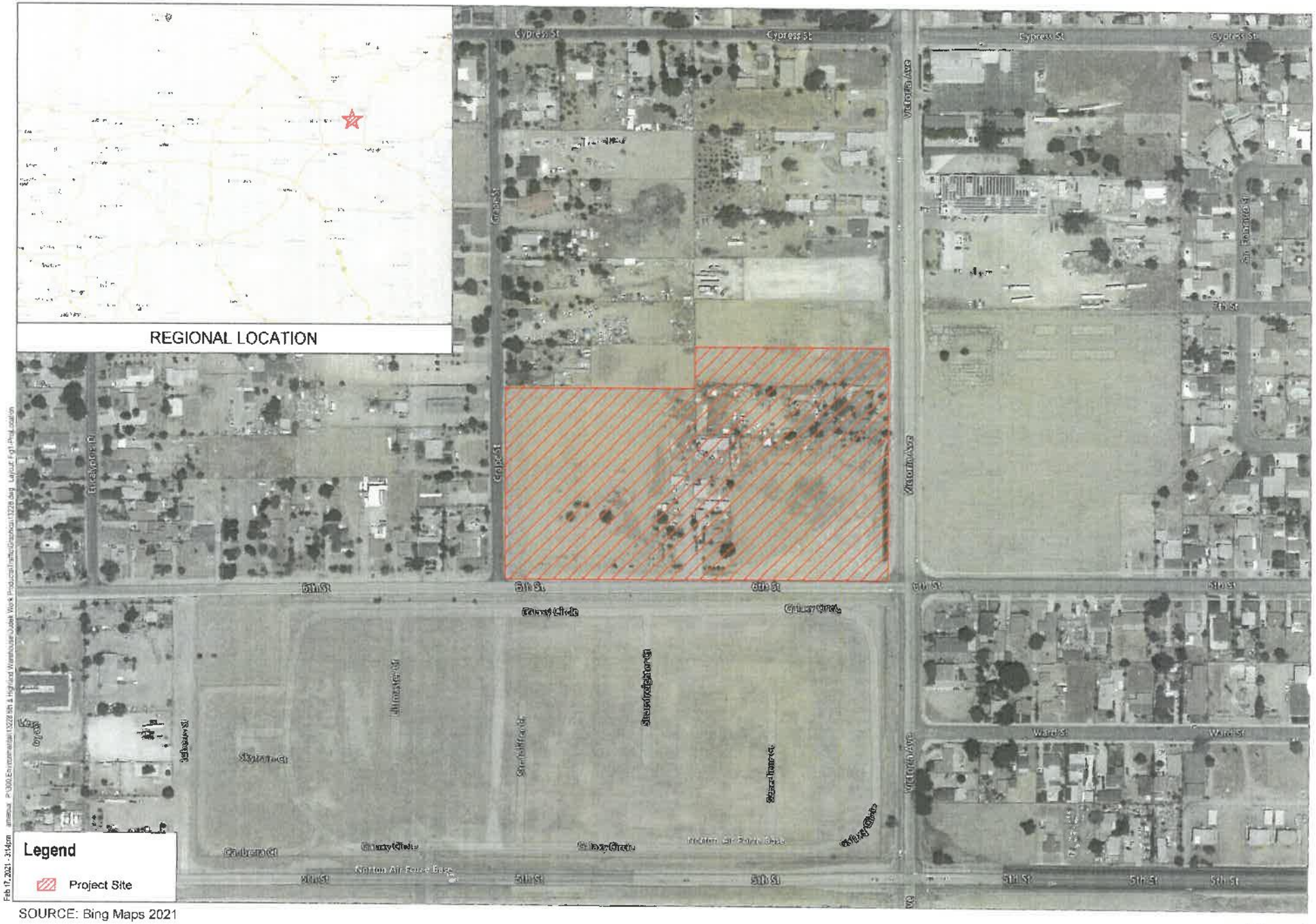
The project is a proposed warehousing development located along the southern border of the City, north of the San Bernardino International Airport and the City of San Bernardino. Table 16.52.030.A in Section 16.52.030 of the Highland Municipal Code (Code) identifies the following off-street automobile parking space requirements for the following land uses applicable to the project:

- *E.3. Warehouse and distribution: 1 space per 1,000 gross feet of floor area devoted to warehousing plus the required amount of parking for gross square footage devoted to other uses.*
- *B.3.I.i. Offices – Administrative, business, professional: 1 space per 250 gross feet of floor area.*

Furthermore, in the case that the project would not be able to provide the Code's required number of spaces, per Section 16.52.020, a decrease in the number of required spaces may be granted through the approval of a variance:

- *F.2. A decrease in the number of spaces required by the schedules for provision of off-street parking and loading spaces and bicycle facilities contained in HMC 16.52.030 and 16.52.040 may be granted under the circumstances identified in HMC 16.52.050, or by the approval of a variance.*

The purpose of this parking study is to determine whether the project will provide an adequate parking supply based on the City Code's parking requirement. In addition, in the event the project could not meet the City's Code parking requirement, the City is allowing a parking demand analysis to be conducted determine whether adequate parking would be supplied on site, subject to the City's review and approval. The parking demand analysis is based on the observed parking demand of two existing warehouses that are of similar use and size to the proposed project and located within three miles of the project site.



SOURCE: Bing Maps 2021

DUDEK

NOT TO SCALE

Figure 1

Project Location

6th and Victoria Avenue Warehouse Project

Project Description

The project site consists of vacant and occupied parcels located between Victoria Avenue and Grape Street, north of 6th Street. The project proposes to construct a 305,617 square feet (SF) industrial warehouse building. Within the 305,617 SF warehouse building, there would be a total of 10,000 SF of office/mezzanine space. The parking supply for passenger vehicles would be a total of 129 spaces, consisting of 65 standard spaces, 2 vanpool parking spaces, 44 compact spaces, 7 accessible spaces compliant with the Americans with Disabilities Act (ADA), 6 clean air vehicle spaces, and 7 electric vehicle spaces (including 1 electric van ADA space and 1 electric ADA space). The site plan is provided in Attachment A.

Municipal Code Parking Requirements

The Code parking requirement for the project was calculated by utilizing the off-street parking requirements established in the Code. Table 2 provides the parking requirements for the proposed project per Section 16.52.030 of the Highland Municipal Code.

Table 1. Parking Requirements per Highland Municipal Code

Land Use	Size	City of Highland Parking Rates	Parking Requirement
Warehouse	295,617 SF	1 space per 1,000 SF of floor area	296 spaces
Office/Mezzanine	10,000 SF	1 space per 250 SF of floor area	40 spaces
Total	**305,617 SF**		**336 spaces**

Notes: SF = square foot

As shown in Table 2, the project would require a total of 336 parking spaces per the Code. This results in an aggregate rate of 1 space per 910 SF (305,617 SF ÷ 336 spaces). As previously indicated, the parking supply for passenger vehicles would be a total of 129 spaces. Therefore, the project would not meet the City's parking requirements per the Code and would have a shortfall of 209 spaces.

Municipal Code Parking Requirements for Other Cities

Parking requirements established in nearby City Codes are summarized in Table 2 to provide a comparison to those established by the City of Highland. As shown in Table 2, the City of Fontana provides the least conservative parking requirements for warehouse land uses, while the City of Highland provides the most conservative parking requirements.

Table 2. Parking Requirements per Various Cities' Municipal Codes

Jurisdiction	Required Parking Rates per Municipal Code	Estimated Required Parking of Proposed Project[1] in other Jurisdictions
Rancho Cucamonga	**Warehouse/Storage:** 1 per 1,000 sf for first 20,000 sf; 1 per 2,000 sf for the next 20,000 sf; and 1 per 4,000 sf for the remaining sf	95
	Office & administration: 4 per 1,000 sf	40
	Total	135
	Required Parking Ratio for Project in Rancho Cucamonga (Spaces/TSF)	0.439
Fontana	**Warehouse/Distribution/Logistics:** One parking space is required for each 1,000 square feet of gross floor area for the initial 20,000 square feet; one parking space is required for each 2,000 square feet of additional gross floor area for the next 20,000 square feet; and one parking space is required for each 5,000 square feet of additional gross floor area over 40,000 square feet.	82
	Professional or Unspecified Office: One parking space is required for each 250 square feet of gross floor area	40
	Total	122
	Required Parking Ratio for Project in Fontana (Spaces/TSF)	0.396
Perris	**Warehousing:** One space per 1,000 square feet of gross floor area for the first 20,000 square feet and one space per 2,000 square feet for that portion over 20,000 square feet	90
	Professional offices: One space for every 300 square feet	34
	Total	124
	Required Parking Ratio for Project in Perris (Spaces/TSF)	0.403
Moreno Valley	**Warehouse and distribution:** 1/1,000 sq. ft. of gross floor area for the first 20,000 sq. ft.; 1/ea. 2,000 sq. ft. of gross floor area for the second 20,000 sq. ft.; 1/ea. 4,000 sq. ft. of gross floor area for areas in excess of the initial 40,000 sq. ft.	95
	Business and professional offices: 1/250 sq. ft. of gross floor area	40
	Total	135
	Required Parking Ratio for Project in Moreno Valley (Spaces/TSF)	0.439
Highland	**Warehouse and distribution:** 1 space per 1,000 gross ft. of floor area devoted to warehousing plus the required amount of parking for gross square footage devoted to other uses	298
	Administrative, business, professional: 1 space per 250 gross ft. of floor area	40
	Total	338
	Required Parking Ratio for Project in Highland (Spaces/TSF)	1.09

Notes: sf/sq. ft. = square foot; TSF = thousand square feet
[1] The proposed project consists of 297,445 SF warehousing and 10,000 SF office-related uses.

Based on review of these parking requirements, the average parking ratio for warehouses within the analyzed jurisdictions is 0.419 ([0.439 + 0.396 + 0.403 + 0.439] ÷ 4), and the average number of parking spaces that would be required for the proposed project within the four other jurisdictions listed in Table 2 is 129 spaces ([135+122+124+135] ÷ 4). As the project proposes to include a parking supply of exactly 129 spaces, the project would provide adequate parking based on an average of the Municipal Code requirements of the other jurisdictions. Additionally, parking supplies provided for other nearby warehousing projects developed by Patriot Development Partners (Patriot) are summarized in Attachment B.

Parking Demand Analysis

As noted above, in the event the project could not meet the City's Code parking requirement, the City is allowing a parking demand analysis to be conducted to determine whether adequate parking would be supplied on site, subject to the City's review and approval. The following parking demand analysis demonstrates whether the project can accommodate peak parking demand, based on the peak parking demand observed at two existing warehouses similar in capacity and located near the project site.

Parking Surveys

The following two existing occupied warehouses were chosen to be surveyed for parking demand:

- 1295 Central Avenue, San Bernardino, CA 92408: an approximately 296,725 SF warehouse (Fender Warehouse), located on the southeast corner of Central Avenue/Tippecanoe Avenue. This facility has 197 passenger vehicle parking spaces and is parked at 1 space per 1,506 SF.
- 27081 Almond Avenue, Redlands, CA 92374: an approximately 326,920 SF warehouse (2AM Logistics BMW Parts Distribution Center), located on the southeast corner of Nevada Street/Almond Avenue. This facility has 174 passenger vehicle parking spaces and is parked at 1 space per 1,879 SF.

It should be noted that the building square footages of the existing warehouses were estimated using aerial photography and were determined to be occupied and in operation based on site observations. Figure 2 shows the locations of both surveyed warehouse sites, relative to the location of the proposed project. Figure 3 shows a close-up view of the 1295 Central Avenue warehouse layout, and Figure 4 shows a close-up view of the 27081 Almond Avenue warehouse layout.

To determine the on-site parking demands of the warehouses, Dudek contracted with a qualified traffic/parking data collection firm to conduct hourly vehicle counts at the driveways of the two warehouses. The driveway counts accounted for vehicles entering and exiting all project driveways every 15 minutes, over a 24-hour period for two typical weekdays of a non-holiday week. The driveway counts were conducted at both sites on Tuesday, February 2, 2021, and Wednesday, February 3, 2021. Raw driveway count data is provided as Attachment C to this memorandum.

The peak parking demand at each site was derived by subtracting the number of vehicles exiting the site and adding the number of vehicles entering the site at each driveway for each 15-minute increment over the 24-hour period to the assumed baseline. Baseline parking space occupancy was calculated for the beginning of each survey period (12:00 a.m.) by determining the number of vehicles that would not result in "negative occupied spaces" at any time throughout the survey. For example, the 1295 Central Avenue Warehouse experienced the greatest net loss of vehicles throughout the survey period (31 vehicles) between 12:00 a.m. and 2:30 a.m. on Tuesday, February 2. After 2:30 AM, the rate at which the number of vehicles entering the site begins to exceed those exiting. Therefore, a baseline of 32 vehicles (31 vehicles plus 1 residual) was assumed to already occupy spaces at the project site at the beginning of the survey period. The same methodology was applied to each day at both warehouses. Worksheets detailing the baseline parking occupancy assumptions, as well as the parking demand calculations, are provided as Attachment D to this memorandum. Table 3 presents the findings of the parking demand analysis.

Table 3. Observed Peak Parking Demand and Rates

Warehouse Site	Size	# of Spaces	Tuesday, February 2, 2021		Wednesday, February 3, 2021	
			Peak Demand	Observed Parking Rate	Peak Demand	Observed Parking Rate
1295 Central Ave	297,860 SF	197	112	1 space per 2,660 SF	111	1 space per 2,684 SF
27081 Almond Ave	326,920 SF	174	55	1 space per 5,416 SF	49	1 space per 6,079 SF
Average Observed Parking Rate[1]			1 space per 4,038 SF			
Highest Observed Parking Rate[2]			1 space per 2,660 SF			

Notes: Based on parking surveys conducted on Tuesday, February 2, 2021, and Wednesday, February 3, 2021.
1 Average observed parking rate is based on the averaging the highest day of parking demand of the two observed sites.
2 Highest observed parking rate is based on the highest day of parking demand of the two observed sites.

Based on Table 3, the highest day of observed parking demand at the 1295 Central Avenue warehouse was Tuesday, February 2, 2021, with a peak demand of 112 spaces at 8:15 a.m. This resulted in a peak parking demand rate of 1 space per 2,660 SF. The highest day of observed parking demand at the 27081 Almond Avenue warehouse was also Tuesday, February 2, 2021, with a peak demand of 55 spaces at 8:00 a.m. This resulted in a peak parking demand rate of 1 space per 5,416 SF. Therefore, the average observed parking rate is 1 space per 4,038 SF, and the highest observed parking rate is 1 space per 2,660 SF over the course of both days.

Project Parking Demand

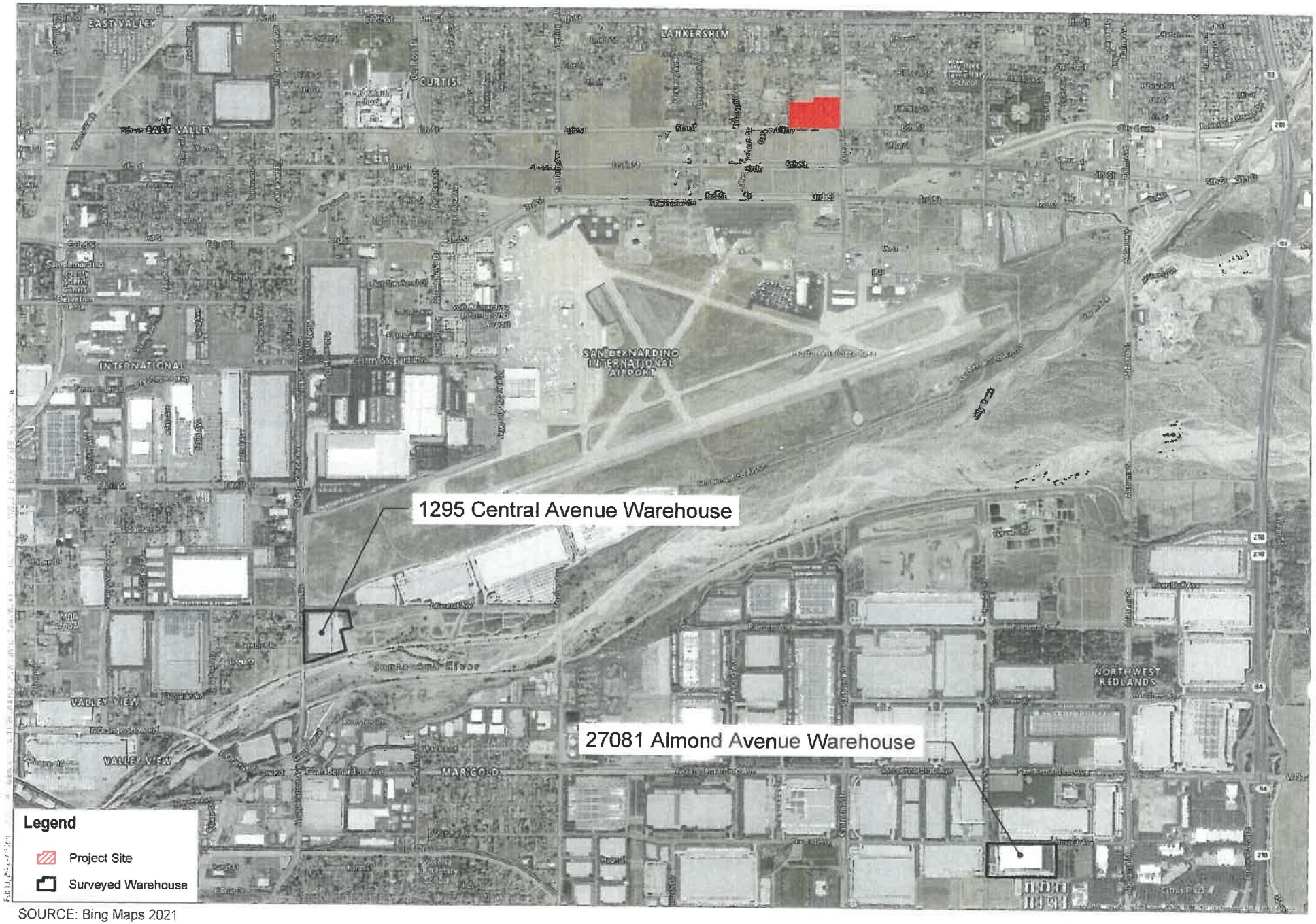
Based on the average observed parking rate of 1 space per 2,660 SF determined from the parking analysis of the two surveyed warehouses, the proposed 307,445 SF warehouse would have a peak parking demand of 77 spaces (305,617 SF ÷ 4,038 SF = 77 spaces). Additionally, the highest parking demand was also calculated to provide a conservative analysis. Using the highest observed parking rate of 1 space per 2,660 SF, the proposed 305,617 SF warehouse would have a peak parking demand of 116 spaces (305,617 SF ÷ 2,660 SF = 116 spaces). These estimates are provided in Table 4 below.

Table 4. Parking Requirements per Observed Rates

Land Use	Size	Observed Parking Rates	Parking Requirement
Warehouse	305,617 SF	1 space per 4,038 SF of floor area[1]	76 spaces
		1 space per 2,660 SF of floor area[2]	115 spaces

Notes: SF = square foot
1 Based on the average observed parking rate noted in Table 2.
2 Based on the highest observed parking rate noted in Table 2.

The proposed project would provide a parking supply of 129 spaces; therefore, assuming the conservative peak parking demand rate of 1 space per 2,660 SF, the project's projected parking demand of 115 spaces would be adequately accommodated within the proposed supply, with a residual of 14 spaces (129 spaces – 115 spaces).



SOURCE: Bing Maps 2021

DUDEK NOT TO SCALE

Figure 2

Surveyed Warehouse Locations

6th and Victoria Avenue Warehouse Project



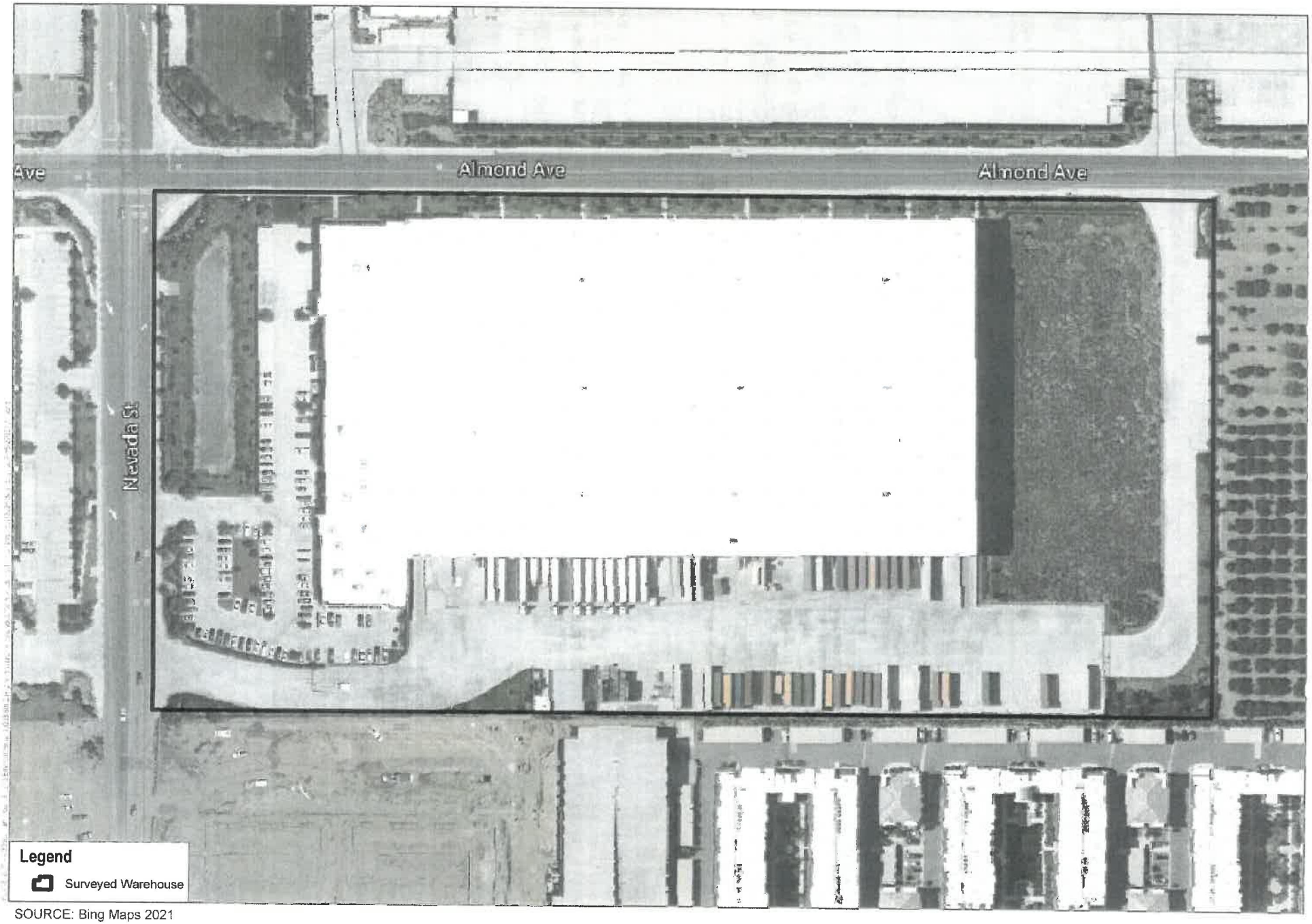
SOURCE: Bing Maps 2021

DUDEK NOT TO SCALE

Figure 3

1295 Central Avenue Warehouse

6th and Victoria Avenue Warehouse Project



SOURCE: Bing Maps 2021

DUDEK NOT TO SCALE

Figure 4

27081 Almond Avenue Warehouse

6th and Victoria Avenue Warehouse Project

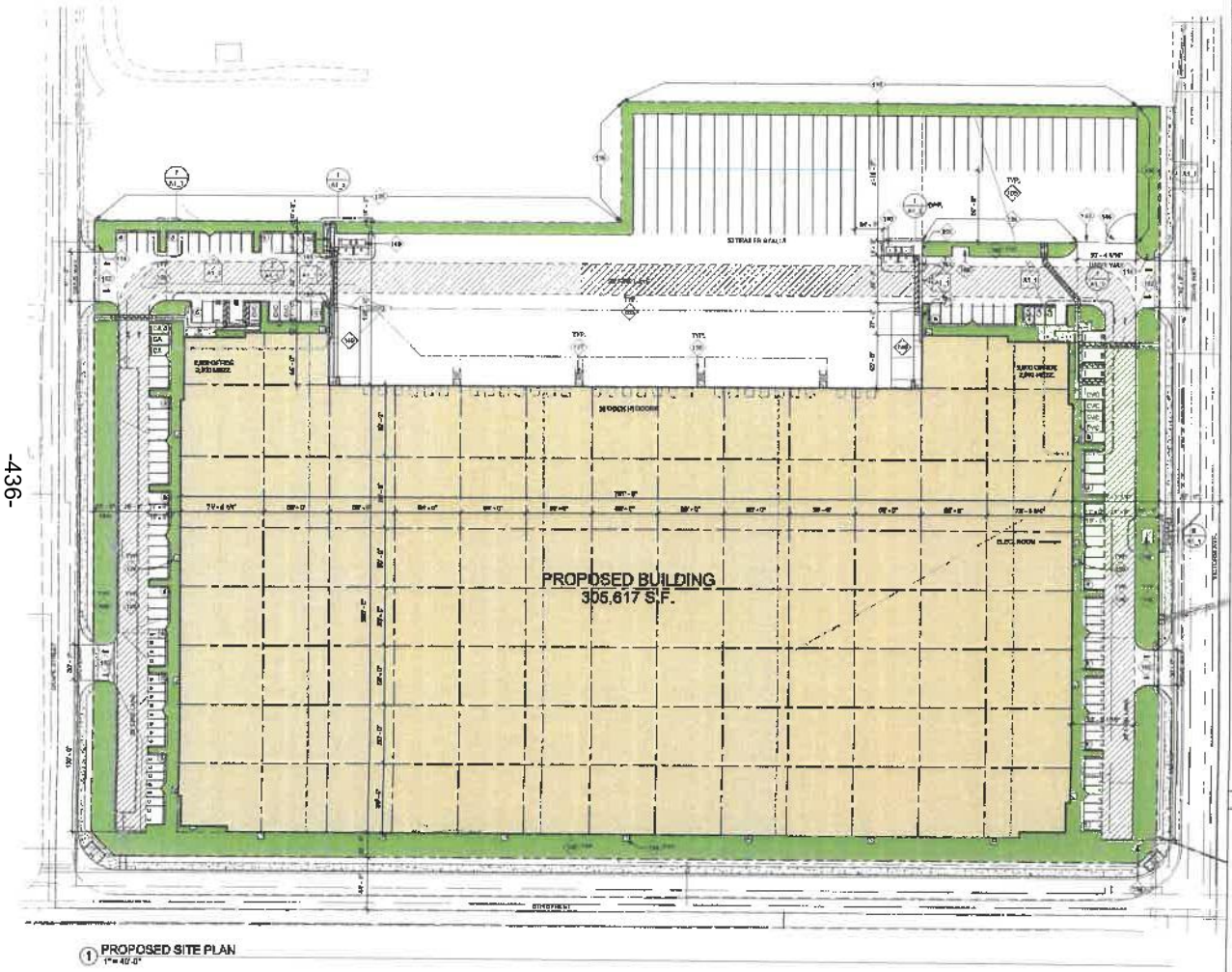
Conclusions

Based on the parking surveys and analysis discussed above, the following conclusions are made for the proposed 6th Street/Victoria Avenue warehouse project:

- Based on the City of Highland Municipal Code parking requirements, the project would require a total of 336 parking spaces.
- The project would provide adequate parking based on an average of the Municipal Code parking requirements of four other nearby jurisdictions (129 spaces).
- Based on the highest observed parking rate of 1 space per 2,660 SF determined from the parking surveys of two existing warehouses near the project site, the proposed 305,617 SF warehouse would have a peak parking demand of 115 spaces (305,617 SF ÷ 2,660 SF = 115 spaces).
- The project's proposed supply of 129 parking spaces can adequately accommodate its forecast parking demand of 115 spaces (based on the highest peak observed parking rate).

Attachment A

Site Plan



1 PROPOSED SITE PLAN
1" = 40'-0"

DEVELOPER/OWNER

ADDRESS:
CONTACT: KEVIN RICE
PHONE: 626.852.9191
EMAIL: KEVIN@PATRIOTDEVELOPMENTPARTNERS.COM

APPLICANT'S REPRESENTATIVE/ARCHITECT

HERDMAN ARCHITECTURE & DESIGN, INC.
1851 SCENTRO WAY
IRVINE, CA 92618
CONTACT: BRADLEY HERDMAN
PHONE: 949.863.1770
EMAIL: BRADLEY@HERDMAN-ADD.COM

SCOPE OF WORK

CONSTRUCT NEW ONE STORY CONCRETE TILT-UP WAREHOUSE/DISTRIBUTION FACILITY WITH EXTERIOR LIGHTING, FIRE SPRINKLERS, ON SITE AND OFF-SITE IMPROVEMENTS INCLUDING PAVING, STORM DRAINS, WATER, SEWER, FIRE HYDRANTS, LANDSCAPE, IRRIGATION AND HARDSCAPE, TRASH ENCLOSURES, CONCRETE SCREEN WALLS, AND RELOCATION OF UTILITIES, GUIDE RAILS AND SIGNS.

LEGAL DESCRIPTION

ASSESSOR'S PARCEL NUMBER: INSERT ON FOR APN

SEE SHEET C1 FOR PLAN and DESCRIPTION

ZONING: BUSINESS PARK

SITE LEGEND

LANDSCAPE AREA

CONCRETE PAVING

BUILDING AREA

9'-0" OVERHANG

9'-0" DIMENSIONED PARKING STALL PER CITY REQUIREMENT

9'-0" OVERHANG

COMPACT PARKING STALL PER CITY REQUIREMENT

VANPOOL PARKING STALL MARKED "VANPOOL" PER CITY REQUIREMENT

TYP. ACCESSIBLE PARKING STALL WITH 8' ACCESS AISLE PER CBC 2019 11B-502.2

TYP. VAN ACCESSIBLE PARKING STALL WITH 8' ACCESS AISLE PER CBC 2019 11B-502.2

15 MIN. VAN PARKING STALL: PAINT, ALTERNATE FINISH OR STALL STRIPING, THE FOLLOWING CHARACTERS SUCH THAT THE LOWER SIDE OF THE LAST UNPAINTED ELEVATED VERTICAL SIDE OF STALL STRIPING AND MEASURES 2 INCHES BETWEEN A PAINTED VOID AND

PER CALGREEN 5.106.5.1

ELECTRIC VEHICLE CHARGING STATION; EVCS STALL SIGN; 1 Polyethylene sign per PARKING STALL(S)

4" DIA CHARGING DISC

IN LIEU OF 12" HIGH MINIMUM, THE LOWER EDGE OF THE LAST RAISED ALGAE WITH THE SIDE OF STALL STRIPING AND IS IN USE. NUMERALS # PARKING

PER CBC 2019 11B-812.3 MOTOR VEHICLE CHARGING SPACES QUALIFY AS REQUIRED PARKING AS DESCRIBED IN SECTION 11B-812.3 SHALL PROVIDE SIGNAGE MARKING STATING "CLEAN AIR VANPOOL ONLY"

PATH OF TRAVEL

PROPERTY LINE

DOCK HIGH DOOR

DRIVE THRU DOOR

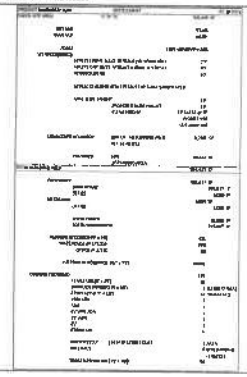
KEYNOTES

102 PROPOSED OFF-HAUL PERIMETER SCREEN BOARDERS.
106 CONCRETE PAVING.
108 PROPOSED LANDSCAPED AREA. SEE LANDSCAPE PLANS.
109 DOUBLE SIDED PARKING LOCATION. PROVIDE CURB, ROLLARD PROTECTION POINTS PER THIS KEYNOTE AND DETAIL.
110 ACCESSIBLE SITE ENTRANCE SIGN.
124 EXTERIOR DOMESTIC LANDINGS.
129 CONCRETE STAIR AND RAMP PER TYP. 12".
132 PAINTED CONCRETE TILT-UP SCREEN WALL OR TRASH ENCLOSURE WALL. PAINT 200ft SITE AND TOP OF WALL. SEE ARCHITECTURAL DRAWING FOR COLOR SCHEDULE.
134 TRASH ENCLOSURE W/ ROOF COVERING.
143 PAINTED STEEL BUILDING CANOPY. PROVIDE CONDUIT TO GATE FOR FUTURE MOTION & OFFICE USES. FOR FUTURE INTERIOR CONTROL. WINDOW AND DOOR ASSEMBLIES BY FIRE AUTHORITY.
144 PAINTED STEEL AWNING GUTTER. PROVIDE CONDUIT TO GATE FOR FUTURE MOTION & OFFICE USES. FOR FUTURE INTERIOR CONTROL. PROVIDE PAINTED PER AS REQUIRED BY FIRE AUTHORITY.
146 CONCRETE TRUCK RAMP AT 4:1 MIN. CONCRETE TILT-UP GUARD ON CBC 6 GUIDE RAIL HAND ALL SIDES OF GRADE. SHALL AVOID MERGE AND ARCHITECTURAL DRAWINGS FOR COLOR REFERENCE.
150 STEEL PIPE BOLLARD PROTECTION POST.
156 PAVEMENT SIGN.
160 PROVIDE MOTORCYCLE PARKING SPACE

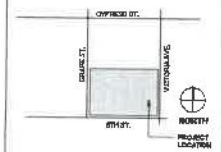
SITE PLAN GENERAL NOTES

1. THE SITE PLAN SHALL MEET ALL CVD ENGINEERING & MPWD REQUIREMENTS.
2. BEFORE CONTRACTOR TO REVIEW THE SOILS REPORT AND ALL REQUIREMENTS LISTED ON THE TITLE SHEET AND FOLLOW ALL RECOMMENDATIONS.
3. U.O.N., ALL DIMENSIONS TO CONCRETE WALLS ARE DIMENSIONED TO THE CENTER LINE OF THE WALL OR FACE OF CONCRETE. ALL DIMENSIONS TO FRAMED WALLS ARE EITHER TO THE CENTER LINE OF THE WALL FRAMING (SHOWN WITH A CENTERLINE) OR THE FACE OF THE WALL FINISH.
4. REFER TO CIVIL AND MEP PLANS TO CONFIRM UTILITY INFORMATION SHOWN ON THE ARCHITECTS SITE PLAN AND FOR ADDITIONAL UTILITY INFORMATION. ESSENTIAL CONTRACTOR TO COORDINATE ALL [illegible] OF CONSTRUCTION.
5. REFER TO CIVIL DRAWINGS FOR ALL PROPOSED GRADING AND SLOPES. ALL FINISHED GRADES TO PROVIDE POSITIVE DRAINAGE AWAY FROM THE BUILDING. GENERAL CONTRACTOR TO VERIFY ON SITE.
6. ALL ACCESSIBLE ROUTES INDENTIFIED ON THE SITE PLAN SHALL BE CONFORM TO THE FOLLOWING:
   a) SLOPES IN THE DIRECTION OF TRAVEL SHALL NOT EXCEED 5%, EXCEPT RAMPS SHALL NOT EXCEED 8%.
   b) THE CLEAR WIDTH OF ALL WALKWAYS SHALL BE 4'-0" MIN.
   c) CHANGES IN LEVEL UP TO 1/2" SHALL BE VERTICAL. CHANGES IN LEVEL GREATER THAN 1/2" SHALL BE BEVELED WITH A SLOPE NOT GREATER THAN 1:2.
   d) AT DOORWAYS, THE LEVEL AREA ON THE LATCH SIDE OF THE DOOR SHALL BE A MINIMUM OF 24" PLUS THE WIDTH OF THE DOOR. SEE PLANS FOR ADDITIONAL DOOR CLEARANCE REQUIREMENTS.
   e) THE VERTICAL CLEARANCE ALONG THE ACCESSIBLE ROUTE IS 80" MIN.
7. ALL PAVED AND LANDSCAPED AREAS TO BE CURBED BY A MIN. 6" HIGH, 6" WIDE CONCRETE CURB U.O.N.
8. A CONCRETE MOW STRIP EXTENDING 2' BEYOND EACH END OF THE PARKING RAIL IS PROVIDED AT ALL PARKING SPACES WHERE THE RAIL IS PARALLEL OR VERTICAL TO THE PAVED SURFACE. SEE RAILS.
9. A 30" HIGH SPLASH BLOCK SHALL BE PROVIDED AT THE SIDES OF ALL ENTRIES. DOORS ROUTE THAT DISCHARGE ON SURFACES OTHER THAN CONCRETE. SEE SHEET
10. PROVIDE PIPE BOLLARD PROTECTION POSTS AS REQUIRED BY UTILITY COMPANIES AND/OR FIRE AUTHORITIES AT ALL EXTERIOR ELECTRICAL EQUIPMENT AND FIRE PROTECTION DEVICES. PIPING BOLLARD PROTECTION POST DETAILS ARE NOT PREPARED BY UTILITY COMPANIES AND/OR FIRE AUTHORITY. SEE DETAIL
11. ALL EXPOSED MONITOR/SPRINKLER DEVICE COATINGS SHALL BE PAINTED POWDER COATED.
12. WHERE OCCUPIED, GENERAL CONTRACTOR TO PROVIDE TEMPORARY RAMP AND CURB PROVIDING AT ALL FUTURE AND PLANTER WALLS WHERE THE SIDE OF THE WALL OPPOSITE THE ROLL SIDE IS EXPOSED TO VIEW AND ALL EXTERIOR WALLS WHERE THE ADJACENT FLOOR SURFACE IS BELOW GRADE. SEE [illegible]

PROJECT INFORMATION



VICINITY MAP



PROJECT
PATRIOT PARTNERS 6TH AND VICTORIA
HIGHLAND, CA
2ND PLANNING SUBMITTAL

HERDMAN
ARCHITECTURE + DESIGN
A20-3*22
07.15.2021

SITE PLAN

A1

7/15/2021 2:40:38 PM

Attachment B

Parking Ratios at Other Patriot Developments

Ratio of Parking Provided to Square Footage at Other Patriot Warehouses

Project Name	Jurisdiction	Status	Size (SF)	Parking Provided (Spaces)	Ratio (Provided Spaces/TSF)	Parking Required[1] (Spaces)	Ratio (Required Spaces/TSF)
6th & Center	Rancho Cucamonga	Operational	117,293	92	0.784	50	0.426
Banana/Rose	Fontana	Approved	159,115	115	0.723	54	0.338
Willow	Fontana	Approved	160,834	149	0.926	51	0.337
Almond Avenue	Fontana	Approved	146,864	90	0.613	51	0.350
Palmetto Avenue	Fontana	Approved	90,620	82	0.905	40	0.350
Washington/ Live Oak	Fontana	In review; parking ratios accepted	176,987	96	0.542	57	0.443
Perris/Morgan	Perris	In review; parking ratios accepted	284,753	254	0.892	152	0.324
Heacock/ Krameria	Moreno Valley	In review; parking ratios accepted	99,486	72	0.724	45	0.535
			Average Ratio for Other Patriot Projects		0.764		0.401
6th Street/ Victoria Avenue	Highland	In review	307,445	129	0.420	308	1.098

Notes: SF = square foot; TSF = thousand square feet

[1] Parking required by total building square footage (i.e. parking required is based on warehousing land use; office space is not separated out).

Attachment C

Raw Driveway Counts

Prepared by National Data & Surveying Services

Trip GEN Study

Location: Fender Warehouse Dwy At E Central Ave
City: San Bernardino

DATE	Classification					
	Car		HT		Totals	
	In	Out	In	Out	In	Out
2/2/2021	208	209	27	31	***235***	***240***
2/3/2021	220	229	36	33	***256***	***262***
Totals	***428***	***438***	***63***	***64***	***491***	***502***

Prepared by National Data & Surveying Services

In & Out

Location: Fender Warehouse Dwy At E Central Ave
City: San Bernardino

Date: 2/2/2021
Day: Tuesday

TIME	Cars	
	In	Out
12:00 AM	0	0
12:15 AM	0	0
12:30 AM	1	4
12:45 AM	1	1
1:00 AM	0	11
1:15 AM	0	1
1:30 AM	0	2
1:45 AM	0	0
2:00 AM	0	0
2:15 AM	0	12
2:30 AM	0	1
2:45 AM	1	0
3:00 AM	1	0
3:15 AM	0	0
3:30 AM	0	0
3:45 AM	3	1
4:00 AM	1	0
4:15 AM	7	0
4:30 AM	16	2
4:45 AM	26	1
5:00 AM	5	0
5:15 AM	4	0
5:30 AM	7	0
5:45 AM	30	1
6:00 AM	3	0
6:15 AM	1	0
6:30 AM	1	0
6:45 AM	3	1
7:00 AM	1	2
7:15 AM	2	1
7:30 AM	5	1
7:45 AM	3	1
8:00 AM	0	0
8:15 AM	2	0
8:30 AM	0	1
8:45 AM	1	1
9:00 AM	0	3
9:15 AM	0	1
9:30 AM	1	3
9:45 AM	5	4
10:00 AM	1	0
10:15 AM	2	0
10:30 AM	4	5
10:45 AM	2	2
11:00 AM	1	1
11:15 AM	0	2
11:30 AM	0	2
11:45 AM	1	2
12:00 PM	2	2
12:15 PM	0	0
12:30 PM	0	0
12:45 PM	2	2
1:00 PM	0	1
1:15 PM	4	2
1:30 PM	3	12
1:45 PM	5	2
2:00 PM	1	2
2:15 PM	3	8
2:30 PM	4	33
2:45 PM	6	4
3:00 PM	5	14
3:15 PM	7	2
3:30 PM	2	5
3:45 PM	1	9
4:00 PM	1	3
4:15 PM	0	3
4:30 PM	0	1
4:45 PM	0	3
5:00 PM	0	1
5:15 PM	0	0
5:30 PM	0	0
5:45 PM	0	0
6:00 PM	0	0
6:15 PM	0	1
6:30 PM	4	4
6:45 PM	2	0
7:00 PM	0	2
7:15 PM	0	1
7:30 PM	1	1
7:45 PM	0	0
8:00 PM	4	7
8:15 PM	2	1
8:30 PM	3	1
8:45 PM	1	0
9:00 PM	0	1
9:15 PM	1	1
9:30 PM	1	1
9:45 PM	0	0
10:00 PM	1	0
10:15 PM	0	0
10:30 PM	0	0
10:45 PM	0	1
11:00 PM	0	2
11:15 PM	0	1
11:30 PM	0	0
11:45 PM	0	2
Totals	*208*	*209*

TIME	HT	
	In	Out
12:00 AM	0	3
12:15 AM	0	0
12:30 AM	0	1
12:45 AM	0	0
1:00 AM	0	0
1:15 AM	0	0
1:30 AM	0	0
1:45 AM	0	0
2:00 AM	0	0
2:15 AM	1	0
2:30 AM	1	0
2:45 AM	0	1
3:00 AM	0	1
3:15 AM	0	0
3:30 AM	0	0
3:45 AM	0	0
4:00 AM	1	0
4:15 AM	0	0
4:30 AM	0	0
4:45 AM	0	0
5:00 AM	0	0
5:15 AM	0	0
5:30 AM	0	0
5:45 AM	0	0
6:00 AM	1	1
6:15 AM	0	0
6:30 AM	0	1
6:45 AM	0	0
7:00 AM	0	0
7:15 AM	1	0
7:30 AM	1	0
7:45 AM	0	0
8:00 AM	0	0
8:15 AM	0	0
8:30 AM	1	0
8:45 AM	2	1
9:00 AM	0	2
9:15 AM	0	0
9:30 AM	0	0
9:45 AM	1	1
10:00 AM	0	1
10:15 AM	0	0
10:30 AM	0	0
10:45 AM	0	0
11:00 AM	0	0
11:15 AM	2	0
11:30 AM	0	1
11:45 AM	1	0
12:00 PM	0	1
12:15 PM	0	0
12:30 PM	1	0
12:45 PM	2	1
1:00 PM	1	2
1:15 PM	2	0
1:30 PM	0	3
1:45 PM	1	1
2:00 PM	1	1
2:15 PM	1	0
2:30 PM	0	0
2:45 PM	0	2
3:00 PM	0	0
3:15 PM	0	0
3:30 PM	0	0
3:45 PM	1	0
4:00 PM	0	1
4:15 PM	0	1
4:30 PM	0	0
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9:00 PM	0	0
9:15 PM	0	0
9:30 PM	1	0
9:45 PM	0	0
10:00 PM	0	0
10:15 PM	1	0
10:30 PM	0	1
10:45 PM	0	0
11:00 PM	0	1
11:15 PM	0	0
11:30 PM	0	0
11:45 PM	0	0
Totals	*27*	*31*

Prepared by National Data & Surveying Services

In & Out

Location: Fender Warehouse Dwy At E Central Ave
City: San Bernardino

Date: 2/3/2021
Day: Wednesday

TIME	Cars	
	In	Out
12:00 AM	0	0
12:15 AM	0	0
12:30 AM	0	2
12:45 AM	1	4
1:00 AM	2	17
1:15 AM	0	4
1:30 AM	0	1
1:45 AM	0	0
2:00 AM	0	0
2:15 AM	1	0
2:30 AM	1	1
2:45 AM	1	0
3:00 AM	2	2
3:15 AM	0	2
3:30 AM	0	0
3:45 AM	1	0
4:00 AM	2	0
4:15 AM	5	0
4:30 AM	12	1
4:45 AM	32	2
5:00 AM	5	0
5:15 AM	4	0
5:30 AM	5	1
5:45 AM	24	1
6:00 AM	13	0
6:15 AM	1	0
6:30 AM	1	0
6:45 AM	3	0
7:00 AM	3	2
7:15 AM	1	2
7:30 AM	0	1
7:45 AM	2	0
8:00 AM	3	1
8:15 AM	3	0
8:30 AM	2	2
8:45 AM	2	1
9:00 AM	0	0
9:15 AM	0	7
9:30 AM	4	3
9:45 AM	4	5
10:00 AM	4	2
10:15 AM	2	0
10:30 AM	2	4
10:45 AM	2	3
11:00 AM	1	4
11:15 AM	2	1
11:30 AM	1	5
11:45 AM	1	0
12:00 PM	3	1
12:15 PM	1	2
12:30 PM	1	2
12:45 PM	1	0
1:00 PM	0	3
1:15 PM	2	0
1:30 PM	2	5
1:45 PM	7	5
2:00 PM	0	2
2:15 PM	3	7
2:30 PM	3	40
2:45 PM	2	11
3:00 PM	4	15
3:15 PM	11	5
3:30 PM	1	7
3:45 PM	0	3
4:00 PM	2	4
4:15 PM	0	2
4:30 PM	1	3
4:45 PM	0	1
5:00 PM	0	1
5:15 PM	0	0
5:30 PM	0	1
5:45 PM	1	0
6:00 PM	0	2
6:15 PM	0	3
6:30 PM	0	1
6:45 PM	1	1
7:00 PM	1	2
7:15 PM	1	1
7:30 PM	0	0
7:45 PM	1	1
8:00 PM	3	7
8:15 PM	3	0
8:30 PM	0	0
8:45 PM	1	0
9:00 PM	2	2
9:15 PM	0	1
9:30 PM	1	1
9:45 PM	0	0
10:00 PM	0	0
10:15 PM	0	0
10:30 PM	0	2
10:45 PM	0	3
11:00 PM	1	0
11:15 PM	0	1
11:30 PM	0	0
11:45 PM	0	0
Totals	220	229

TIME	HT	
	In	Out
12:00 AM	0	0
12:15 AM	0	0
12:30 AM	0	0
12:45 AM	1	0
1:00 AM	0	0
1:15 AM	0	1
1:30 AM	0	0
1:45 AM	0	0
2:00 AM	0	0
2:15 AM	1	0
2:30 AM	0	0
2:45 AM	0	1
3:00 AM	0	0
3:15 AM	0	0
3:30 AM	1	0
3:45 AM	0	0
4:00 AM	0	1
4:15 AM	0	0
4:30 AM	0	0
4:45 AM	1	0
5:00 AM	0	0
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5:45 AM	0	0
6:00 AM	0	0
6:15 AM	0	0
6:30 AM	0	1
6:45 AM	0	0
7:00 AM	1	0
7:15 AM	1	0
7:30 AM	0	0
7:45 AM	0	0
8:00 AM	2	0
8:15 AM	0	0
8:30 AM	0	1
8:45 AM	0	0
9:00 AM	1	0
9:15 AM	1	1
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10:45 AM	1	0
11:00 AM	0	0
11:15 AM	1	1
11:30 AM	1	0
11:45 AM	1	1
12:00 PM	1	0
12:15 PM	0	2
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12:45 PM	1	0
1:00 PM	1	0
1:15 PM	0	2
1:30 PM	2	0
1:45 PM	0	2
2:00 PM	1	3
2:15 PM	2	1
2:30 PM	1	1
2:45 PM	1	2
3:00 PM	0	2
3:15 PM	0	0
3:30 PM	0	0
3:45 PM	1	0
4:00 PM	0	0
4:15 PM	0	0
4:30 PM	2	1
4:45 PM	0	0
5:00 PM	0	1
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5:45 PM	1	0
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7:30 PM	0	0
7:45 PM	0	0
8:00 PM	0	0
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9:15 PM	0	0
9:30 PM	0	0
9:45 PM	1	0
10:00 PM	0	0
10:15 PM	0	1
10:30 PM	0	0
10:45 PM	0	0
11:00 PM	0	0
11:15 PM	1	0
11:30 PM	1	0
11:45 PM	2	1
Totals	36	33

Prepared by National Data & Surveying Services

Trip GEN Study

Location: Fender Warehouse Dwy At S Tippecanoe Ave
City: San Bernardino

DATE	Classification					
	Car		HT		Totals	
	In	Out	In	Out	In	Out
2/2/2021	0	1	0	0	*0*	*1*
2/3/2021	3	3	0	0	*3*	*3*
Totals	*3*	*4*	*0*	*0*	*3*	*4*

Prepared by National Data & Surveying Services

In & Out

Location: Fender Warehouse Dwy At S Tippecanoe Ave
City: San Bernardino

Date: 2/2/2021
Day: Tuesday

TIME	Cars	
	In	Out
12:00 AM	0	1
12:15 AM	0	0
12:30 AM	0	0
12:45 AM	0	0
1:00 AM	0	0
1:15 AM	0	0
1:30 AM	0	0
1:45 AM	0	0
2:00 AM	0	0
2:15 AM	0	0
2:30 AM	0	0
2:45 AM	0	0
3:00 AM	0	0
3:15 AM	0	0
3:30 AM	0	0
3:45 AM	0	0
4:00 AM	0	0
4:15 AM	0	0
4:30 AM	0	0
4:45 AM	0	0
5:00 AM	0	0
5:15 AM	0	0
5:30 AM	0	0
5:45 AM	0	0
6:00 AM	0	0
6:15 AM	0	0
6:30 AM	0	0
6:45 AM	0	0
7:00 AM	0	0
7:15 AM	0	0
7:30 AM	0	0
7:45 AM	0	0
8:00 AM	0	0
8:15 AM	0	0
8:30 AM	0	0
8:45 AM	0	0
9:00 AM	0	0
9:15 AM	0	0
9:30 AM	0	0
9:45 AM	0	0
10:00 AM	0	0
10:15 AM	0	0
10:30 AM	0	0
10:45 AM	0	0
11:00 AM	0	0
11:15 AM	0	0
11:30 AM	0	0
11:45 AM	0	0
12:00 PM	0	0
12:15 PM	0	0
12:30 PM	0	0
12:45 PM	0	0
1:00 PM	0	0
1:15 PM	0	0
1:30 PM	0	0
1:45 PM	0	0
2:00 PM	0	0
2:15 PM	0	0
2:30 PM	0	0
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3:00 PM	0	0
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4:15 PM	0	0
4:30 PM	0	0
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5:00 PM	0	0
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5:30 PM	0	0
5:45 PM	0	0
6:00 PM	0	0
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7:45 PM	0	0
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8:45 PM	0	0
9:00 PM	0	0
9:15 PM	0	0
9:30 PM	0	0
9:45 PM	0	0
10:00 PM	0	0
10:15 PM	0	0
10:30 PM	0	0
10:45 PM	0	0
11:00 PM	0	0
11:15 PM	0	0
11:30 PM	0	0
11:45 PM	0	0
Totals	0	1

TIME	HT	
	In	Out
12:00 AM	0	0
12:15 AM	0	0
12:30 AM	0	0
12:45 AM	0	0
1:00 AM	0	0
1:15 AM	0	0
1:30 AM	0	0
1:45 AM	0	0
2:00 AM	0	0
2:15 AM	0	0
2:30 AM	0	0
2:45 AM	0	0
3:00 AM	0	0
3:15 AM	0	0
3:30 AM	0	0
3:45 AM	0	0
4:00 AM	0	0
4:15 AM	0	0
4:30 AM	0	0
4:45 AM	0	0
5:00 AM	0	0
5:15 AM	0	0
5:30 AM	0	0
5:45 AM	0	0
6:00 AM	0	0
6:15 AM	0	0
6:30 AM	0	0
6:45 AM	0	0
7:00 AM	0	0
7:15 AM	0	0
7:30 AM	0	0
7:45 AM	0	0
8:00 AM	0	0
8:15 AM	0	0
8:30 AM	0	0
8:45 AM	0	0
9:00 AM	0	0
9:15 AM	0	0
9:30 AM	0	0
9:45 AM	0	0
10:00 AM	0	0
10:15 AM	0	0
10:30 AM	0	0
10:45 AM	0	0
11:00 AM	0	0
11:15 AM	0	0
11:30 AM	0	0
11:45 AM	0	0
12:00 PM	0	0
12:15 PM	0	0
12:30 PM	0	0
12:45 PM	0	0
1:00 PM	0	0
1:15 PM	0	0
1:30 PM	0	0
1:45 PM	0	0
2:00 PM	0	0
2:15 PM	0	0
2:30 PM	0	0
2:45 PM	0	0
3:00 PM	0	0
3:15 PM	0	0
3:30 PM	0	0
3:45 PM	0	0
4:00 PM	0	0
4:15 PM	0	0
4:30 PM	0	0
4:45 PM	0	0
5:00 PM	0	0
5:15 PM	0	0
5:30 PM	0	0
5:45 PM	0	0
6:00 PM	0	0
6:15 PM	0	0
6:30 PM	0	0
6:45 PM	0	0
7:00 PM	0	0
7:15 PM	0	0
7:30 PM	0	0
7:45 PM	0	0
8:00 PM	0	0
8:15 PM	0	0
8:30 PM	0	0
8:45 PM	0	0
9:00 PM	0	0
9:15 PM	0	0
9:30 PM	0	0
9:45 PM	0	0
10:00 PM	0	0
10:15 PM	0	0
10:30 PM	0	0
10:45 PM	0	0
11:00 PM	0	0
11:15 PM	0	0
11:30 PM	0	0
11:45 PM	0	0
Totals	0	0

Prepared by National Data & Surveying Services

In & Out

Location: Fender Warehouse Dwy At S Tippecanoe Ave
City: San Bernardino

Date: 2/3/2021
Day: Wednesday

TIME	Cars	
	In	Out
12:00 AM	0	0
12:15 AM	0	0
12:30 AM	0	0
12:45 AM	0	0
1:00 AM	0	0
1:15 AM	0	0
1:30 AM	0	0
1:45 AM	0	0
2:00 AM	1	0
2:15 AM	0	1
2:30 AM	0	0
2:45 AM	0	0
3:00 AM	0	0
3:15 AM	0	0
3:30 AM	0	0
3:45 AM	0	0
4:00 AM	0	0
4:15 AM	0	0
4:30 AM	0	0
4:45 AM	0	0
5:00 AM	0	0
5:15 AM	0	0
5:30 AM	1	0
5:45 AM	1	0
6:00 AM	0	2
6:15 AM	0	0
6:30 AM	0	0
6:45 AM	0	0
7:00 AM	0	0
7:15 AM	0	0
7:30 AM	0	0
7:45 AM	0	0
8:00 AM	0	0
8:15 AM	0	0
8:30 AM	0	0
8:45 AM	0	0
9:00 AM	0	0
9:15 AM	0	0
9:30 AM	0	0
9:45 AM	0	0
10:00 AM	0	0
10:15 AM	0	0
10:30 AM	0	0
10:45 AM	0	0
11:00 AM	0	0
11:15 AM	0	0
11:30 AM	0	0
11:45 AM	0	0
12:00 PM	0	0
12:15 PM	0	0
12:30 PM	0	0
12:45 PM	0	0
1:00 PM	0	0
1:15 PM	0	0
1:30 PM	0	0
1:45 PM	0	0
2:00 PM	0	0
2:15 PM	0	0
2:30 PM	0	0
2:45 PM	0	0
3:00 PM	0	0
3:15 PM	0	0
3:30 PM	0	0
3:45 PM	0	0
4:00 PM	0	0
4:15 PM	0	0
4:30 PM	0	0
4:45 PM	0	0
5:00 PM	0	0
5:15 PM	0	0
5:30 PM	0	0
5:45 PM	0	0
6:00 PM	0	0
6:15 PM	0	0
6:30 PM	0	0
6:45 PM	0	0
7:00 PM	0	0
7:15 PM	0	0
7:30 PM	0	0
7:45 PM	0	0
8:00 PM	0	0
8:15 PM	0	0
8:30 PM	0	0
8:45 PM	0	0
9:00 PM	0	0
9:15 PM	0	0
9:30 PM	0	0
9:45 PM	0	0
10:00 PM	0	0
10:15 PM	0	0
10:30 PM	0	0
10:45 PM	0	0
11:00 PM	0	0
11:15 PM	0	0
11:30 PM	0	0
11:45 PM	0	0
Totals	3	3

TIME	HT	
	In	Out
12:00 AM	0	0
12:15 AM	0	0
12:30 AM	0	0
12:45 AM	0	0
1:00 AM	0	0
1:15 AM	0	0
1:30 AM	0	0
1:45 AM	0	0
2:00 AM	0	0
2:15 AM	0	0
2:30 AM	0	0
2:45 AM	0	0
3:00 AM	0	0
3:15 AM	0	0
3:30 AM	0	0
3:45 AM	0	0
4:00 AM	0	0
4:15 AM	0	0
4:30 AM	0	0
4:45 AM	0	0
5:00 AM	0	0
5:15 AM	0	0
5:30 AM	0	0
5:45 AM	0	0
6:00 AM	0	0
6:15 AM	0	0
6:30 AM	0	0
6:45 AM	0	0
7:00 AM	0	0
7:15 AM	0	0
7:30 AM	0	0
7:45 AM	0	0
8:00 AM	0	0
8:15 AM	0	0
8:30 AM	0	0
8:45 AM	0	0
9:00 AM	0	0
9:15 AM	0	0
9:30 AM	0	0
9:45 AM	0	0
10:00 AM	0	0
10:15 AM	0	0
10:30 AM	0	0
10:45 AM	0	0
11:00 AM	0	0
11:15 AM	0	0
11:30 AM	0	0
11:45 AM	0	0
12:00 PM	0	0
12:15 PM	0	0
12:30 PM	0	0
12:45 PM	0	0
1:00 PM	0	0
1:15 PM	0	0
1:30 PM	0	0
1:45 PM	0	0
2:00 PM	0	0
2:15 PM	0	0
2:30 PM	0	0
2:45 PM	0	0
3:00 PM	0	0
3:15 PM	0	0
3:30 PM	0	0
3:45 PM	0	0
4:00 PM	0	0
4:15 PM	0	0
4:30 PM	0	0
4:45 PM	0	0
5:00 PM	0	0
5:15 PM	0	0
5:30 PM	0	0
5:45 PM	0	0
6:00 PM	0	0
6:15 PM	0	0
6:30 PM	0	0
6:45 PM	0	0
7:00 PM	0	0
7:15 PM	0	0
7:30 PM	0	0
7:45 PM	0	0
8:00 PM	0	0
8:15 PM	0	0
8:30 PM	0	0
8:45 PM	0	0
9:00 PM	0	0
9:15 PM	0	0
9:30 PM	0	0
9:45 PM	0	0
10:00 PM	0	0
10:15 PM	0	0
10:30 PM	0	0
10:45 PM	0	0
11:00 PM	0	0
11:15 PM	0	0
11:30 PM	0	0
11:45 PM	0	0
Totals	0	0

Prepared by National Data & Surveying Services

Trip GEN Study

Location: 2AM Logistics BMW Parts Distribution Center Dwy At Almond Ave
City: Redlands

DATE	Classification					
	Car		HT		Totals	
	In	Out	In	Out	In	Out
2/2/2021	0	0	0	0	*0*	*0*
2/3/2021	4	5	0	0	*4*	*5*
Totals	*4*	*5*	*0*	*0*	*4*	*5*

Prepared by National Data & Surveying Services

In & Out

Location: 2AM Logistics BMW Parts Distribution Center Dwy At Almond Ave
City: Redlands

Date: 2/2/2021
Day: Tuesday

TIME	Cars	
	In	Out
12:00 AM	0	0
12:15 AM	0	0
12:30 AM	0	0
12:45 AM	0	0
1:00 AM	0	0
1:15 AM	0	0
1:30 AM	0	0
1:45 AM	0	0
2:00 AM	0	0
2:15 AM	0	0
2:30 AM	0	0
2:45 AM	0	0
3:00 AM	0	0
3:15 AM	0	0
3:30 AM	0	0
3:45 AM	0	0
4:00 AM	0	0
4:15 AM	0	0
4:30 AM	0	0
4:45 AM	0	0
5:00 AM	0	0
5:15 AM	0	0
5:30 AM	0	0
5:45 AM	0	0
6:00 AM	0	0
6:15 AM	0	0
6:30 AM	0	0
6:45 AM	0	0
7:00 AM	0	0
7:15 AM	0	0
7:30 AM	0	0
7:45 AM	0	0
8:00 AM	0	0
8:15 AM	0	0
8:30 AM	0	0
8:45 AM	0	0
9:00 AM	0	0
9:15 AM	0	0
9:30 AM	0	0
9:45 AM	0	0
10:00 AM	0	0
10:15 AM	0	0
10:30 AM	0	0
10:45 AM	0	0
11:00 AM	0	0
11:15 AM	0	0
11:30 AM	0	0
11:45 AM	0	0
12:00 PM	0	0
12:15 PM	0	0
12:30 PM	0	0
12:45 PM	0	0
1:00 PM	0	0
1:15 PM	0	0
1:30 PM	0	0
1:45 PM	0	0
2:00 PM	0	0
2:15 PM	0	0
2:30 PM	0	0
2:45 PM	0	0
3:00 PM	0	0
3:15 PM	0	0
3:30 PM	0	0
3:45 PM	0	0
4:00 PM	0	0
4:15 PM	0	0
4:30 PM	0	0
4:45 PM	0	0
5:00 PM	0	0
5:15 PM	0	0
5:30 PM	0	0
5:45 PM	0	0
6:00 PM	0	0
6:15 PM	0	0
6:30 PM	0	0
6:45 PM	0	0
7:00 PM	0	0
7:15 PM	0	0
7:30 PM	0	0
7:45 PM	0	0
8:00 PM	0	0
8:15 PM	0	0
8:30 PM	0	0
8:45 PM	0	0
9:00 PM	0	0
9:15 PM	0	0
9:30 PM	0	0
9:45 PM	0	0
10:00 PM	0	0
10:15 PM	0	0
10:30 PM	0	0
10:45 PM	0	0
11:00 PM	0	0
11:15 PM	0	0
11:30 PM	0	0
11:45 PM	0	0
Totals	0	0

TIME	HT	
	In	Out
12:00 AM	0	0
12:15 AM	0	0
12:30 AM	0	0
12:45 AM	0	0
1:00 AM	0	0
1:15 AM	0	0
1:30 AM	0	0
1:45 AM	0	0
2:00 AM	0	0
2:15 AM	0	0
2:30 AM	0	0
2:45 AM	0	0
3:00 AM	0	0
3:15 AM	0	0
3:30 AM	0	0
3:45 AM	0	0
4:00 AM	0	0
4:15 AM	0	0
4:30 AM	0	0
4:45 AM	0	0
5:00 AM	0	0
5:15 AM	0	0
5:30 AM	0	0
5:45 AM	0	0
6:00 AM	0	0
6:15 AM	0	0
6:30 AM	0	0
6:45 AM	0	0
7:00 AM	0	0
7:15 AM	0	0
7:30 AM	0	0
7:45 AM	0	0
8:00 AM	0	0
8:15 AM	0	0
8:30 AM	0	0
8:45 AM	0	0
9:00 AM	0	0
9:15 AM	0	0
9:30 AM	0	0
9:45 AM	0	0
10:00 AM	0	0
10:15 AM	0	0
10:30 AM	0	0
10:45 AM	0	0
11:00 AM	0	0
11:15 AM	0	0
11:30 AM	0	0
11:45 AM	0	0
12:00 PM	0	0
12:15 PM	0	0
12:30 PM	0	0
12:45 PM	0	0
1:00 PM	0	0
1:15 PM	0	0
1:30 PM	0	0
1:45 PM	0	0
2:00 PM	0	0
2:15 PM	0	0
2:30 PM	0	0
2:45 PM	0	0
3:00 PM	0	0
3:15 PM	0	0
3:30 PM	0	0
3:45 PM	0	0
4:00 PM	0	0
4:15 PM	0	0
4:30 PM	0	0
4:45 PM	0	0
5:00 PM	0	0
5:15 PM	0	0
5:30 PM	0	0
5:45 PM	0	0
6:00 PM	0	0
6:15 PM	0	0
6:30 PM	0	0
6:45 PM	0	0
7:00 PM	0	0
7:15 PM	0	0
7:30 PM	0	0
7:45 PM	0	0
8:00 PM	0	0
8:15 PM	0	0
8:30 PM	0	0
8:45 PM	0	0
9:00 PM	0	0
9:15 PM	0	0
9:30 PM	0	0
9:45 PM	0	0
10:00 PM	0	0
10:15 PM	0	0
10:30 PM	0	0
10:45 PM	0	0
11:00 PM	0	0
11:15 PM	0	0
11:30 PM	0	0
11:45 PM	0	0
Totals	0	0

Prepared by National Data & Surveying Services

In & Out

Location: 2AM Logistics BMW Parts Distribution Center Dwy At Almond Ave
City: Redlands

Date: 2/3/2021
Day: Wednesday

TIME	Cars	
	In	Out
12:00 AM	0	0
12:15 AM	0	0
12:30 AM	0	0
12:45 AM	0	0
1:00 AM	0	0
1:15 AM	0	0
1:30 AM	0	0
1:45 AM	0	0
2:00 AM	0	0
2:15 AM	0	0
2:30 AM	1	0
2:45 AM	0	1
3:00 AM	0	0
3:15 AM	0	0
3:30 AM	0	0
3:45 AM	0	0
4:00 AM	0	0
4:15 AM	0	0
4:30 AM	0	0
4:45 AM	0	0
5:00 AM	0	0
5:15 AM	0	0
5:30 AM	0	0
5:45 AM	0	0
6:00 AM	0	0
6:15 AM	0	0
6:30 AM	0	0
6:45 AM	0	0
7:00 AM	0	0
7:15 AM	1	1
7:30 AM	0	0
7:45 AM	0	0
8:00 AM	0	0
8:15 AM	0	0
8:30 AM	0	0
8:45 AM	0	0
9:00 AM	0	0
9:15 AM	0	1
9:30 AM	0	0
9:45 AM	0	0
10:00 AM	0	0
10:15 AM	0	0
10:30 AM	0	0
10:45 AM	0	0
11:00 AM	0	0
11:15 AM	1	0
11:30 AM	1	2
11:45 AM	0	0
12:00 PM	0	0
12:15 PM	0	0
12:30 PM	0	0
12:45 PM	0	0
1:00 PM	0	0
1:15 PM	0	0
1:30 PM	0	0
1:45 PM	0	0
2:00 PM	0	0
2:15 PM	0	0
2:30 PM	0	0
2:45 PM	0	0
3:00 PM	0	0
3:15 PM	0	0
3:30 PM	0	0
3:45 PM	0	0
4:00 PM	0	0
4:15 PM	0	0
4:30 PM	0	0
4:45 PM	0	0
5:00 PM	0	0
5:15 PM	0	0
5:30 PM	0	0
5:45 PM	0	0
6:00 PM	0	0
6:15 PM	0	0
6:30 PM	0	0
6:45 PM	0	0
7:00 PM	0	0
7:15 PM	0	0
7:30 PM	0	0
7:45 PM	0	0
8:00 PM	0	0
8:15 PM	0	0
8:30 PM	0	0
8:45 PM	0	0
9:00 PM	0	0
9:15 PM	0	0
9:30 PM	0	0
9:45 PM	0	0
10:00 PM	0	0
10:15 PM	0	0
10:30 PM	0	0
10:45 PM	0	0
11:00 PM	0	0
11:15 PM	0	0
11:30 PM	0	0
11:45 PM	0	0
Totals	4	5

TIME	HT	
	In	Out
12:00 AM	0	0
12:15 AM	0	0
12:30 AM	0	0
12:45 AM	0	0
1:00 AM	0	0
1:15 AM	0	0
1:30 AM	0	0
1:45 AM	0	0
2:00 AM	0	0
2:15 AM	0	0
2:30 AM	0	0
2:45 AM	0	0
3:00 AM	0	0
3:15 AM	0	0
3:30 AM	0	0
3:45 AM	0	0
4:00 AM	0	0
4:15 AM	0	0
4:30 AM	0	0
4:45 AM	0	0
5:00 AM	0	0
5:15 AM	0	0
5:30 AM	0	0
5:45 AM	0	0
6:00 AM	0	0
6:15 AM	0	0
6:30 AM	0	0
6:45 AM	0	0
7:00 AM	0	0
7:15 AM	0	0
7:30 AM	0	0
7:45 AM	0	0
8:00 AM	0	0
8:15 AM	0	0
8:30 AM	0	0
8:45 AM	0	0
9:00 AM	0	0
9:15 AM	0	0
9:30 AM	0	0
9:45 AM	0	0
10:00 AM	0	0
10:15 AM	0	0
10:30 AM	0	0
10:45 AM	0	0
11:00 AM	0	0
11:15 AM	0	0
11:30 AM	0	0
11:45 AM	0	0
12:00 PM	0	0
12:15 PM	0	0
12:30 PM	0	0
12:45 PM	0	0
1:00 PM	0	0
1:15 PM	0	0
1:30 PM	0	0
1:45 PM	0	0
2:00 PM	0	0
2:15 PM	0	0
2:30 PM	0	0
2:45 PM	0	0
3:00 PM	0	0
3:15 PM	0	0
3:30 PM	0	0
3:45 PM	0	0
4:00 PM	0	0
4:15 PM	0	0
4:30 PM	0	0
4:45 PM	0	0
5:00 PM	0	0
5:15 PM	0	0
5:30 PM	0	0
5:45 PM	0	0
6:00 PM	0	0
6:15 PM	0	0
6:30 PM	0	0
6:45 PM	0	0
7:00 PM	0	0
7:15 PM	0	0
7:30 PM	0	0
7:45 PM	0	0
8:00 PM	0	0
8:15 PM	0	0
8:30 PM	0	0
8:45 PM	0	0
9:00 PM	0	0
9:15 PM	0	0
9:30 PM	0	0
9:45 PM	0	0
10:00 PM	0	0
10:15 PM	0	0
10:30 PM	0	0
10:45 PM	0	0
11:00 PM	0	0
11:15 PM	0	0
11:30 PM	0	0
11:45 PM	0	0
Totals	0	0

Prepared by National Data & Surveying Services

Trip GEN Study

Location: 2AM Logistics BMW Parts Distribution Center North Dwy At Nevada St
City: Redlands

DATE	Classification					
	Car		HT		Totals	
	In	Out	In	Out	In	Out
2/2/2021	134	136	2	2	***136***	***138***
2/3/2021	130	132	5	5	***135***	***137***
Totals	***264***	***268***	***7***	***7***	***271***	***275***

Prepared by National Data & Surveying Services

In & Out

Location: ZAM Logistics BMW Parts Distribution Center North Dwy At Nevada St
City: Redlands

Date: 2/2/2021
Day: Tuesday

TIME	Cars	
	In	Out
12:00 AM	0	0
12:15 AM	0	0
12:30 AM	0	0
12:45 AM	0	0
1:00 AM	0	0
1:15 AM	0	0
1:30 AM	0	0
1:45 AM	1	0
2:00 AM	1	0
2:15 AM	0	0
2:30 AM	1	0
2:45 AM	0	0
3:00 AM	1	0
3:15 AM	8	0
3:30 AM	15	0
3:45 AM	18	0
4:00 AM	3	0
4:15 AM	1	0
4:30 AM	0	0
4:45 AM	1	0
5:00 AM	0	1
5:15 AM	0	0
5:30 AM	0	0
5:45 AM	0	0
6:00 AM	0	0
6:15 AM	0	0
6:30 AM	0	2
6:45 AM	1	0
7:00 AM	2	1
7:15 AM	1	1
7:30 AM	0	0
7:45 AM	0	0
8:00 AM	1	1
8:15 AM	1	1
8:30 AM	1	1
8:45 AM	0	1
9:00 AM	1	5
9:15 AM	2	2
9:30 AM	0	0
9:45 AM	1	2
10:00 AM	1	1
10:15 AM	0	0
10:30 AM	0	0
10:45 AM	2	3
11:00 AM	0	2
11:15 AM	0	0
11:30 AM	1	1
11:45 AM	2	1
12:00 PM	0	0
12:15 PM	0	2
12:30 PM	17	44
12:45 PM	23	1
1:00 PM	2	1
1:15 PM	0	0
1:30 PM	1	1
1:45 PM	0	0
2:00 PM	1	0
2:15 PM	0	1
2:30 PM	0	3
2:45 PM	1	0
3:00 PM	0	0
3:15 PM	0	0
3:30 PM	0	0
3:45 PM	2	0
4:00 PM	0	1
4:15 PM	0	0
4:30 PM	0	0
4:45 PM	1	2
5:00 PM	2	3
5:15 PM	2	1
5:30 PM	2	3
5:45 PM	1	1
6:00 PM	1	0
6:15 PM	0	1
6:30 PM	1	0
6:45 PM	0	0
7:00 PM	1	2
7:15 PM	1	0
7:30 PM	3	1
7:45 PM	0	0
8:00 PM	1	0
8:15 PM	1	0
8:30 PM	1	0
8:45 PM	1	2
9:00 PM	0	2
9:15 PM	0	2
9:30 PM	0	34
9:45 PM	0	1
10:00 PM	1	0
10:15 PM	0	0
10:30 PM	0	0
10:45 PM	0	0
11:00 PM	0	0
11:15 PM	0	0
11:30 PM	0	0
11:45 PM	0	0
Totals	134	136

TIME	HT	
	In	Out
12:00 AM	0	0
12:15 AM	0	0
12:30 AM	0	0
12:45 AM	0	0
1:00 AM	0	0
1:15 AM	0	0
1:30 AM	0	0
1:45 AM	0	0
2:00 AM	0	0
2:15 AM	0	0
2:30 AM	0	0
2:45 AM	0	0
3:00 AM	0	0
3:15 AM	0	0
3:30 AM	0	0
3:45 AM	0	0
4:00 AM	0	0
4:15 AM	0	0
4:30 AM	0	0
4:45 AM	0	0
5:00 AM	0	0
5:15 AM	0	0
5:30 AM	0	0
5:45 AM	0	0
6:00 AM	0	0
6:15 AM	0	0
6:30 AM	0	0
6:45 AM	0	0
7:00 AM	0	0
7:15 AM	0	0
7:30 AM	0	0
7:45 AM	0	0
8:00 AM	0	0
8:15 AM	0	0
8:30 AM	0	0
8:45 AM	0	0
9:00 AM	0	0
9:15 AM	0	0
9:30 AM	0	1
9:45 AM	0	0
10:00 AM	0	0
10:15 AM	0	0
10:30 AM	0	0
10:45 AM	0	0
11:00 AM	0	0
11:15 AM	0	0
11:30 AM	0	0
11:45 AM	0	0
12:00 PM	0	0
12:15 PM	0	0
12:30 PM	0	0
12:45 PM	1	1
1:00 PM	0	0
1:15 PM	0	0
1:30 PM	0	0
1:45 PM	0	0
2:00 PM	0	0
2:15 PM	0	0
2:30 PM	0	0
2:45 PM	0	0
3:00 PM	0	0
3:15 PM	0	0
3:30 PM	0	0
3:45 PM	0	0
4:00 PM	0	0
4:15 PM	0	0
4:30 PM	0	0
4:45 PM	0	0
5:00 PM	0	0
5:15 PM	1	0
5:30 PM	0	0
5:45 PM	0	0
6:00 PM	0	0
6:15 PM	0	0
6:30 PM	0	0
6:45 PM	0	0
7:00 PM	0	0
7:15 PM	0	0
7:30 PM	0	0
7:45 PM	0	0
8:00 PM	0	0
8:15 PM	0	0
8:30 PM	0	0
8:45 PM	0	0
9:00 PM	0	0
9:15 PM	0	0
9:30 PM	0	0
9:45 PM	0	0
10:00 PM	0	0
10:15 PM	0	0
10:30 PM	0	0
10:45 PM	0	0
11:00 PM	0	0
11:15 PM	0	0
11:30 PM	0	0
11:45 PM	0	0
Totals	2	2

Prepared by National Data & Surveying Services

In & Out

Location: 24M Logistics BMW Parts Distribution Center North Dwy At Nevada St
City: Redlands

Date: 2/3/2021
Day: Wednesday

TIME	Cars	
	In	Out
12:00 AM	0	0
12:15 AM	0	0
12:30 AM	0	0
12:45 AM	0	0
1:00 AM	0	0
1:15 AM	0	0
1:30 AM	0	0
1:45 AM	0	0
2:00 AM	2	0
2:15 AM	0	0
2:30 AM	1	0
2:45 AM	1	0
3:00 AM	0	1
3:15 AM	8	0
3:30 AM	8	0
3:45 AM	19	0
4:00 AM	3	0
4:15 AM	1	0
4:30 AM	1	0
4:45 AM	0	1
5:00 AM	0	0
5:15 AM	0	0
5:30 AM	0	1
5:45 AM	2	1
6:00 AM	0	1
6:15 AM	2	0
6:30 AM	0	0
6:45 AM	1	1
7:00 AM	0	0
7:15 AM	1	0
7:30 AM	1	1
7:45 AM	1	1
8:00 AM	1	3
8:15 AM	2	1
8:30 AM	0	2
8:45 AM	1	2
9:00 AM	0	0
9:15 AM	0	1
9:30 AM	1	1
9:45 AM	2	2
10:00 AM	0	2
10:15 AM	1	0
10:30 AM	0	1
10:45 AM	2	3
11:00 AM	0	1
11:15 AM	0	0
11:30 AM	0	2
11:45 AM	1	0
12:00 PM	0	0
12:15 PM	0	3
12:30 PM	8	39
12:45 PM	30	1
1:00 PM	2	0
1:15 PM	1	0
1:30 PM	0	3
1:45 PM	0	0
2:00 PM	0	0
2:15 PM	0	0
2:30 PM	0	0
2:45 PM	0	0
3:00 PM	0	0
3:15 PM	1	0
3:30 PM	1	0
3:45 PM	1	2
4:00 PM	1	1
4:15 PM	0	0
4:30 PM	0	0
4:45 PM	0	0
5:00 PM	1	3
5:15 PM	2	3
5:30 PM	4	3
5:45 PM	3	0
6:00 PM	0	1
6:15 PM	0	0
6:30 PM	0	0
6:45 PM	0	0
7:00 PM	0	0
7:15 PM	0	0
7:30 PM	4	0
7:45 PM	1	0
8:00 PM	0	1
8:15 PM	1	0
8:30 PM	2	0
8:45 PM	1	1
9:00 PM	2	1
9:15 PM	0	6
9:30 PM	0	34
9:45 PM	1	1
10:00 PM	0	0
10:15 PM	0	0
10:30 PM	0	0
10:45 PM	0	0
11:00 PM	0	0
11:15 PM	0	0
11:30 PM	0	0
11:45 PM	0	0
Totals	130	132

TIME	HT	
	In	Out
12:00 AM	0	0
12:15 AM	0	0
12:30 AM	0	0
12:45 AM	0	0
1:00 AM	0	0
1:15 AM	0	0
1:30 AM	0	0
1:45 AM	0	0
2:00 AM	0	0
2:15 AM	0	0
2:30 AM	0	0
2:45 AM	0	0
3:00 AM	0	0
3:15 AM	0	0
3:30 AM	0	0
3:45 AM	0	0
4:00 AM	0	0
4:15 AM	0	0
4:30 AM	0	0
4:45 AM	0	0
5:00 AM	0	0
5:15 AM	0	0
5:30 AM	0	0
5:45 AM	0	0
6:00 AM	0	0
6:15 AM	0	0
6:30 AM	0	0
6:45 AM	0	0
7:00 AM	0	0
7:15 AM	0	0
7:30 AM	0	0
7:45 AM	0	0
8:00 AM	0	0
8:15 AM	0	0
8:30 AM	0	0
8:45 AM	0	0
9:00 AM	0	0
9:15 AM	0	0
9:30 AM	0	0
9:45 AM	0	1
10:00 AM	0	0
10:15 AM	0	0
10:30 AM	1	0
10:45 AM	0	0
11:00 AM	0	0
11:15 AM	0	0
11:30 AM	0	0
11:45 AM	0	0
12:00 PM	0	0
12:15 PM	0	0
12:30 PM	0	1
12:45 PM	0	0
1:00 PM	0	0
1:15 PM	1	0
1:30 PM	0	0
1:45 PM	0	0
2:00 PM	1	0
2:15 PM	0	1
2:30 PM	0	0
2:45 PM	1	1
3:00 PM	0	0
3:15 PM	0	0
3:30 PM	0	0
3:45 PM	0	0
4:00 PM	0	0
4:15 PM	0	0
4:30 PM	0	0
4:45 PM	1	0
5:00 PM	0	1
5:15 PM	0	0
5:30 PM	0	0
5:45 PM	0	0
6:00 PM	0	0
6:15 PM	0	0
6:30 PM	0	0
6:45 PM	0	0
7:00 PM	0	0
7:15 PM	0	0
7:30 PM	0	0
7:45 PM	0	0
8:00 PM	0	0
8:15 PM	0	0
8:30 PM	0	0
8:45 PM	0	0
9:00 PM	0	0
9:15 PM	0	0
9:30 PM	0	0
9:45 PM	0	0
10:00 PM	0	0
10:15 PM	0	0
10:30 PM	0	0
10:45 PM	0	0
11:00 PM	0	0
11:15 PM	0	0
11:30 PM	0	0
11:45 PM	0	0
Totals	5	5

Prepared by National Data & Surveying Services

Trip GEN Study

Location: 2AM Logistics BMW Parts Distribution Center South Dwy At Nevada St
City: Redlands

DATE	Classification					
	Car		HT		Totals	
	In	Out	In	Out	In	Out
2/2/2021	15	15	35	33	*50*	*48*
2/3/2021	8	8	33	35	*41*	*43*
Totals	*23*	*23*	*68*	*68*	*91*	*91*

Prepared by National Data & Surveying Services

In & Out

Location: 2AM Logistics BMW Parts Distribution Center South Dwy At Nevada St
City: Redlands

Date: 2/2/2021
Day: Tuesday

TIME	Cars	
	In	Out
12:00 AM	0	0
12:15 AM	0	0
12:30 AM	0	0
12:45 AM	0	0
1:00 AM	0	0
1:15 AM	0	0
1:30 AM	0	0
1:45 AM	0	0
2:00 AM	0	0
2:15 AM	0	0
2:30 AM	0	0
2:45 AM	0	0
3:00 AM	0	0
3:15 AM	0	0
3:30 AM	0	0
3:45 AM	0	0
4:00 AM	0	0
4:15 AM	0	0
4:30 AM	0	0
4:45 AM	0	0
5:00 AM	0	0
5:15 AM	0	0
5:30 AM	0	0
5:45 AM	0	0
6:00 AM	0	0
6:15 AM	0	0
6:30 AM	0	0
6:45 AM	1	1
7:00 AM	0	0
7:15 AM	0	0
7:30 AM	0	0
7:45 AM	0	0
8:00 AM	2	0
8:15 AM	0	2
8:30 AM	1	1
8:45 AM	0	0
9:00 AM	1	0
9:15 AM	0	0
9:30 AM	0	0
9:45 AM	0	0
10:00 AM	0	0
10:15 AM	0	0
10:30 AM	1	1
10:45 AM	1	1
11:00 AM	1	0
11:15 AM	0	0
11:30 AM	0	1
11:45 AM	0	0
12:00 PM	1	1
12:15 PM	0	1
12:30 PM	2	2
12:45 PM	0	0
1:00 PM	1	0
1:15 PM	0	0
1:30 PM	0	1
1:45 PM	0	0
2:00 PM	0	0
2:15 PM	0	0
2:30 PM	0	0
2:45 PM	0	0
3:00 PM	0	0
3:15 PM	1	1
3:30 PM	0	0
3:45 PM	0	0
4:00 PM	0	0
4:15 PM	0	0
4:30 PM	0	0
4:45 PM	0	0
5:00 PM	0	0
5:15 PM	0	0
5:30 PM	0	0
5:45 PM	1	1
6:00 PM	1	0
6:15 PM	0	1
6:30 PM	0	0
6:45 PM	0	0
7:00 PM	0	0
7:15 PM	0	0
7:30 PM	0	0
7:45 PM	0	0
8:00 PM	0	0
8:15 PM	0	0
8:30 PM	0	0
8:45 PM	0	0
9:00 PM	0	0
9:15 PM	0	0
9:30 PM	0	0
9:45 PM	0	0
10:00 PM	0	0
10:15 PM	0	0
10:30 PM	0	0
10:45 PM	0	0
11:00 PM	0	0
11:15 PM	0	0
11:30 PM	0	0
11:45 PM	0	0
Totals	15	15

TIME	HT	
	In	Out
12:00 AM	0	0
12:15 AM	0	0
12:30 AM	0	0
12:45 AM	0	0
1:00 AM	0	0
1:15 AM	1	0
1:30 AM	0	1
1:45 AM	0	0
2:00 AM	0	0
2:15 AM	0	0
2:30 AM	0	0
2:45 AM	0	1
3:00 AM	0	0
9:15 AM	0	0
3:30 AM	0	0
3:45 AM	0	0
4:00 AM	0	0
4:15 AM	0	0
4:30 AM	0	0
4:45 AM	0	0
5:00 AM	0	0
5:15 AM	0	0
5:30 AM	0	0
5:45 AM	0	0
6:00 AM	0	0
6:15 AM	0	0
6:30 AM	0	0
6:45 AM	0	0
7:00 AM	1	0
7:15 AM	0	0
7:30 AM	1	0
7:45 AM	1	0
8:00 AM	1	1
8:15 AM	0	0
8:30 AM	2	1
8:45 AM	3	0
9:00 AM	1	0
9:15 AM	1	0
9:30 AM	1	0
9:45 AM	1	0
10:00 AM	2	1
10:15 AM	0	2
10:30 AM	1	0
10:45 AM	1	0
11:00 AM	0	1
11:15 AM	0	1
11:30 AM	1	2
11:45 AM	0	0
12:00 PM	1	0
12:15 PM	0	1
12:30 PM	0	0
12:45 PM	1	0
1:00 PM	0	0
1:15 PM	0	0
1:30 PM	2	1
1:45 PM	0	1
2:00 PM	2	0
2:15 PM	0	0
2:30 PM	0	0
2:45 PM	0	0
3:00 PM	1	0
3:15 PM	0	3
3:30 PM	1	0
3:45 PM	0	1
4:00 PM	1	0
4:15 PM	0	0
4:30 PM	1	0
4:45 PM	0	0
5:00 PM	0	0
5:15 PM	0	1
5:30 PM	1	1
5:45 PM	0	0
6:00 PM	1	0
6:15 PM	0	1
6:30 PM	0	0
6:45 PM	1	0
7:00 PM	0	0
7:15 PM	0	1
7:30 PM	0	0
7:45 PM	0	0
8:00 PM	0	0
8:15 PM	0	0
8:30 PM	0	1
8:45 PM	0	3
9:00 PM	0	2
9:15 PM	0	1
9:30 PM	0	1
9:45 PM	0	0
10:00 PM	1	0
10:15 PM	0	0
10:30 PM	1	2
10:45 PM	0	0
11:00 PM	0	1
11:15 PM	0	0
11:30 PM	1	0
11:45 PM	0	0
Totals	35	33

Prepared by National Data & Surveying Services

In & Out

Location: 2AM Logistics BMW Parts Distribution Center South Dwy At Nevada St
City: Redlands

Date: 2/3/2021
Day: Wednesday

TIME	Cars	
	In	Out
12:00 AM	0	0
12:15 AM	0	0
12:30 AM	0	0
12:45 AM	0	0
1:00 AM	0	0
1:15 AM	0	0
1:30 AM	0	0
1:45 AM	0	0
2:00 AM	0	0
2:15 AM	0	0
2:30 AM	0	0
2:45 AM	0	0
3:00 AM	1	0
3:15 AM	0	1
3:30 AM	0	0
3:45 AM	0	0
4:00 AM	0	0
4:15 AM	0	0
4:30 AM	0	0
4:45 AM	0	0
5:00 AM	0	0
5:15 AM	0	0
5:30 AM	0	0
5:45 AM	0	0
6:00 AM	1	0
6:15 AM	0	0
6:30 AM	0	0
6:45 AM	0	0
7:00 AM	0	0
7:15 AM	0	0
7:30 AM	0	0
7:45 AM	0	0
8:00 AM	0	0
8:15 AM	1	0
8:30 AM	0	1
8:45 AM	0	0
9:00 AM	0	0
9:15 AM	0	0
9:30 AM	0	1
9:45 AM	0	0
10:00 AM	0	0
10:15 AM	0	0
10:30 AM	0	0
10:45 AM	1	0
11:00 AM	0	0
11:15 AM	0	0
11:30 AM	0	1
11:45 AM	0	0
12:00 PM	1	1
12:15 PM	0	0
12:30 PM	0	0
12:45 PM	0	0
1:00 PM	0	0
1:15 PM	1	0
1:30 PM	0	0
1:45 PM	0	0
2:00 PM	0	1
2:15 PM	0	0
2:30 PM	0	0
2:45 PM	0	0
3:00 PM	0	0
3:15 PM	0	0
3:30 PM	0	0
3:45 PM	1	0
4:00 PM	0	1
4:15 PM	0	0
4:30 PM	0	0
4:45 PM	1	1
5:00 PM	0	0
5:15 PM	0	0
5:30 PM	0	0
5:45 PM	0	0
6:00 PM	0	0
6:15 PM	0	0
6:30 PM	0	0
6:45 PM	0	0
7:00 PM	0	0
7:15 PM	0	0
7:30 PM	0	0
7:45 PM	0	0
8:00 PM	0	0
8:15 PM	0	0
8:30 PM	0	0
8:45 PM	0	0
9:00 PM	0	0
9:15 PM	0	0
9:30 PM	0	0
9:45 PM	0	0
10:00 PM	0	0
10:15 PM	0	0
10:30 PM	0	0
10:45 PM	0	0
11:00 PM	0	0
11:15 PM	0	0
11:30 PM	0	0
11:45 PM	0	0
Totals	8	8

TIME	HT	
	In	Out
12:00 AM	0	0
12:15 AM	1	1
12:30 AM	1	0
12:45 AM	0	2
1:00 AM	0	0
1:15 AM	0	0
1:30 AM	0	0
1:45 AM	0	0
2:00 AM	0	0
2:15 AM	0	0
2:30 AM	0	0
2:45 AM	0	1
3:00 AM	0	0
3:15 AM	0	0
3:30 AM	0	0
3:45 AM	0	0
4:00 AM	0	0
4:15 AM	0	0
4:30 AM	0	0
4:45 AM	0	0
5:00 AM	0	0
5:15 AM	0	0
5:30 AM	0	0
5:45 AM	0	0
6:00 AM	0	0
6:15 AM	0	0
6:30 AM	0	0
6:45 AM	0	0
7:00 AM	0	0
7:15 AM	0	0
7:30 AM	1	0
7:45 AM	0	0
8:00 AM	0	0
8:15 AM	3	0
8:30 AM	0	0
8:45 AM	0	0
9:00 AM	3	0
9:15 AM	2	1
9:30 AM	0	0
9:45 AM	3	0
10:00 AM	0	0
10:15 AM	1	1
10:30 AM	3	1
10:45 AM	1	1
11:00 AM	0	1
11:15 AM	1	2
11:30 AM	0	2
11:45 AM	0	0
12:00 PM	1	0
12:15 PM	0	1
12:30 PM	0	0
12:45 PM	1	0
1:00 PM	0	0
1:15 PM	1	1
1:30 PM	0	0
1:45 PM	1	0
2:00 PM	0	0
2:15 PM	1	0
2:30 PM	0	0
2:45 PM	1	1
3:00 PM	0	1
3:15 PM	0	1
3:30 PM	0	1
3:45 PM	2	0
4:00 PM	0	0
4:15 PM	0	0
4:30 PM	1	1
4:45 PM	0	0
5:00 PM	0	0
5:15 PM	0	1
5:30 PM	1	1
5:45 PM	0	0
6:00 PM	0	0
6:15 PM	0	1
6:30 PM	0	0
6:45 PM	1	0
7:00 PM	0	0
7:15 PM	0	1
7:30 PM	0	0
7:45 PM	0	0
8:00 PM	0	0
8:15 PM	1	0
8:30 PM	0	2
8:45 PM	0	1
9:00 PM	0	1
9:15 PM	0	4
9:30 PM	0	1
9:45 PM	1	0
10:00 PM	0	1
10:15 PM	0	1
10:30 PM	0	0
10:45 PM	0	0
11:00 PM	0	0
11:15 PM	0	0
11:30 PM	0	0
11:45 PM	0	0
Totals	33	35

Attachment D

Parking Demand Worksheets

3250 Central Avenue (Fender Warehouse)

TOTAL (both driveways)

TIME	Tuesday, February 2, 2021 Cars In	Cars Out	TIME	Wednesday, February 3, 2021 Cars In	Cars Out
12:00 AM	0	1	12:00 AM	0	0
12:15 AM	0	0	12:15 AM	0	0
12:30 AM	1	4	12:30 AM	0	2
12:45 AM	1	1	12:45 AM	2	6
1:00 AM	0	11	1:00 AM	2	17
1:15 AM	0	1	1:15 AM	0	4
1:30 AM	0	2	1:30 AM	0	1
1:45 AM	0	0	1:45 AM	0	0
2:00 AM	0	0	2:00 AM	1	0
2:15 AM	0	12	2:15 AM	1	1
2:30 AM	0	1	2:30 AM	1	1
2:45 AM	1	0	2:45 AM	1	0
3:00 AM	1	0	3:00 AM	2	2
3:15 AM	0	0	3:15 AM	0	2
3:30 AM	0	0	3:30 AM	0	0
3:45 AM	3	1	3:45 AM	1	0
4:00 AM	1	0	4:00 AM	2	0
4:15 AM	7	0	4:15 AM	5	0
4:30 AM	16	2	4:30 AM	12	1
4:45 AM	26	1	4:45 AM	32	2
5:00 AM	5	0	5:00 AM	5	0
5:15 AM	4	0	5:15 AM	4	0
5:30 AM	7	0	5:30 AM	6	1
5:45 AM	30	1	5:45 AM	25	1
6:00 AM	3	0	6:00 AM	13	2
6:15 AM	1	0	6:15 AM	1	0
6:30 AM	1	0	6:30 AM	1	0
6:45 AM	3	1	6:45 AM	3	0
7:00 AM	1	2	7:00 AM	3	2
7:15 AM	2	1	7:15 AM	1	2
7:30 AM	0	1	7:30 AM	0	1
7:45 AM	3	1	7:45 AM	2	0
8:00 AM	0	0	8:00 AM	3	1
8:15 AM	2	0	8:15 AM	3	0
8:30 AM	0	1	8:30 AM	2	2
8:45 AM	1	1	8:45 AM	2	1
9:00 AM	0	3	9:00 AM	0	0
9:15 AM	0	1	9:15 AM	0	7
9:30 AM	1	3	9:30 AM	1	3
9:45 AM	3	4	9:45 AM	4	5
10:00 AM	1	0	10:00 AM	4	2
10:15 AM	2	0	10:15 AM	2	0
10:30 AM	4	5	10:30 AM	2	4
10:45 AM	2	2	10:45 AM	7	3
11:00 AM	1	1	11:00 AM	1	4
11:15 AM	0	7	11:15 AM	2	1
11:30 AM	0	2	11:30 AM	1	5
11:45 AM	1	2	11:45 AM	1	0
12:00 PM	2	2	12:00 PM	3	1
12:15 PM	0	0	12:15 PM	1	2
12:30 PM	0	0	12:30 PM	1	2
12:45 PM	2	2	12:45 PM	1	0
1:00 PM	0	1	1:00 PM	0	5
1:15 PM	4	2	1:15 PM	2	0
1:30 PM	3	12	1:30 PM	2	5
1:45 PM	5	2	1:45 PM	7	5
2:00 PM	1	2	2:00 PM	0	2
2:15 PM	3	8	2:15 PM	3	7
2:30 PM	4	33	2:30 PM	3	40
2:45 PM	6	4	2:45 PM	2	11
3:00 PM	5	14	3:00 PM	4	15
3:15 PM	2	2	3:15 PM	11	6
3:30 PM	2	9	3:30 PM	1	7
3:45 PM	1	9	3:45 PM	2	3
4:00 PM	1	3	4:00 PM	2	4
4:15 PM	0	3	4:15 PM	0	2
4:30 PM	0	1	4:30 PM	1	3
4:45 PM	0	3	4:45 PM	0	1
5:00 PM	0	1	5:00 PM	0	1
5:15 PM	0	0	5:15 PM	0	0
5:30 PM	0	0	5:30 PM	0	1
5:45 PM	0	0	5:45 PM	1	0
6:00 PM	0	0	6:00 PM	0	2
6:15 PM	0	1	6:15 PM	0	3
6:30 PM	4	4	6:30 PM	0	1
6:45 PM	2	0	6:45 PM	1	1
7:00 PM	0	2	7:00 PM	1	2
7:15 PM	0	1	7:15 PM	1	1
7:30 PM	1	1	7:30 PM	0	0
7:45 PM	0	0	7:45 PM	1	1
8:00 PM	4	7	8:00 PM	3	7
8:15 PM	2	1	8:15 PM	3	0
8:30 PM	3	1	8:30 PM	0	0
8:45 PM	1	0	8:45 PM	1	0
9:00 PM	0	1	9:00 PM	2	2
9:15 PM	1	1	9:15 PM	0	1
9:30 PM	1	1	9:30 PM	1	1
9:45 PM	0	0	9:45 PM	0	0
10:00 PM	1	0	10:00 PM	0	0
10:15 PM	0	0	10:15 PM	0	1
10:30 PM	0	0	10:30 PM	0	2
10:45 PM	0	1	10:45 PM	0	2
11:00 PM	0	2	11:00 PM	1	0
11:15 PM	0	1	11:15 PM	0	1
11:30 PM	0	0	11:30 PM	0	0
11:45 PM	0	2	11:45 PM	0	0
Totals	208	210	Totals	223	232

Parking Occupancy & Duration, 3250 (all driveways)

TIME	Tuesday, February 2, 2021 Cars In	Cars Out	Parking Occupied	TIME	Wednesday, February 3, 2021 Cars In	Cars Out	Parking Occupied
12:00 AM	0	1	31	12:00 AM	0	0	26
12:15 AM	0	0	31	12:15 AM	0	0	26
12:30 AM	1	4	28	12:30 AM	0	2	24
12:45 AM	1	1	28	12:45 AM	1	4	21
1:00 AM	0	11	17	1:00 AM	2	17	6
1:15 AM	0	1	16	1:15 AM	0	4	2
1:30 AM	0	2	14	1:30 AM	0	1	1
1:45 AM	0	0	14	1:45 AM	0	0	1
2:00 AM	0	0	14	2:00 AM	1	0	2
2:15 AM	0	12	2	2:15 AM	1	1	2
2:30 AM	0	1	1	2:30 AM	1	1	2
2:45 AM	1	0	2	2:45 AM	1	0	3
3:00 AM	1	0	3	3:00 AM	2	2	3
3:15 AM	0	0	3	3:15 AM	0	2	1
3:30 AM	0	0	3	3:30 AM	0	0	1
3:45 AM	3	1	5	3:45 AM	1	0	2
4:00 AM	1	0	6	4:00 AM	2	0	4
4:15 AM	7	0	13	4:15 AM	5	0	9
4:30 AM	16	2	27	4:30 AM	12	1	20
4:45 AM	26	1	52	4:45 AM	32	2	50
5:00 AM	5	0	57	5:00 AM	5	0	55
5:15 AM	4	0	61	5:15 AM	4	0	59
5:30 AM	7	0	68	5:30 AM	8	1	64
5:45 AM	30	1	97	5:45 AM	25	1	88
6:00 AM	3	0	100	6:00 AM	13	2	99
6:15 AM	1	0	101	6:15 AM	1	0	100
6:30 AM	1	0	102	6:30 AM	1	0	101
6:45 AM	3	1	104	6:45 AM	3	0	104
7:00 AM	1	2	103	7:00 AM	3	2	105
7:15 AM	2	1	104	7:15 AM	1	2	104
7:30 AM	0	1	103	7:30 AM	0	1	103
7:45 AM	3	1	110	7:45 AM	2	0	105
8:00 AM	0	0	110	8:00 AM	3	1	107
8:15 AM	2	0	112	8:15 AM	3	0	110
8:30 AM	0	1	111	8:30 AM	2	2	110
8:45 AM	1	1	111	8:45 AM	2	1	111
9:00 AM	0	3	108	9:00 AM	0	0	111
9:15 AM	0	1	107	9:15 AM	0	7	104
9:30 AM	1	3	105	9:30 AM	4	3	105
9:45 AM	3	4	104	9:45 AM	4	5	104
10:00 AM	1	0	107	10:00 AM	4	2	106
10:15 AM	2	0	109	10:15 AM	2	0	108
10:30 AM	4	5	108	10:30 AM	2	4	106
10:45 AM	2	2	108	10:45 AM	7	3	110
11:00 AM	1	1	108	11:00 AM	1	4	107
11:15 AM	0	2	106	11:15 AM	2	1	108
11:30 AM	0	2	104	11:30 AM	1	5	104
11:45 AM	1	2	103	11:45 AM	1	0	105
12:00 PM	2	2	103	12:00 PM	3	1	107
12:15 PM	0	0	103	12:15 PM	1	2	106
12:30 PM	0	0	103	12:30 PM	1	2	105
12:45 PM	2	2	103	12:45 PM	1	0	106
1:00 PM	0	1	102	1:00 PM	0	3	103
1:15 PM	4	2	104	1:15 PM	2	0	105
1:30 PM	3	12	95	1:30 PM	2	5	102
1:45 PM	5	2	98	1:45 PM	7	5	104
2:00 PM	1	2	97	2:00 PM	0	2	102
2:15 PM	3	8	92	2:15 PM	3	7	98
2:30 PM	4	33	63	2:30 PM	3	40	81
2:45 PM	6	4	65	2:45 PM	2	11	52
3:00 PM	5	14	56	3:00 PM	4	15	41
3:15 PM	2	2	61	3:15 PM	11	6	47
3:30 PM	2	9	55	3:30 PM	1	7	41
3:45 PM	1	9	47	3:45 PM	0	3	38
4:00 PM	1	3	45	4:00 PM	2	4	36
4:15 PM	0	3	42	4:15 PM	0	2	34
4:30 PM	0	1	41	4:30 PM	1	3	32
4:45 PM	0	3	38	4:45 PM	0	1	31
5:00 PM	0	1	37	5:00 PM	0	1	30
5:15 PM	0	0	37	5:15 PM	0	0	30
5:30 PM	0	0	37	5:30 PM	0	1	29
5:45 PM	0	0	37	5:45 PM	1	0	30
6:00 PM	0	0	37	6:00 PM	0	2	28
6:15 PM	0	1	36	6:15 PM	0	3	25
6:30 PM	4	4	36	6:30 PM	0	1	24
6:45 PM	2	0	38	6:45 PM	1	1	24
7:00 PM	0	2	36	7:00 PM	1	2	23
7:15 PM	0	1	35	7:15 PM	1	1	23
7:30 PM	1	1	35	7:30 PM	0	0	23
7:45 PM	0	0	35	7:45 PM	1	1	23
8:00 PM	4	7	32	8:00 PM	3	7	19
8:15 PM	2	1	33	8:15 PM	3	0	22
8:30 PM	3	1	35	8:30 PM	0	0	22
8:45 PM	1	0	36	8:45 PM	1	0	23
9:00 PM	0	1	35	9:00 PM	2	2	23
9:15 PM	1	1	35	9:15 PM	0	1	22
9:30 PM	1	1	35	9:30 PM	1	1	22
9:45 PM	0	0	35	9:45 PM	0	0	22
10:00 PM	1	0	36	10:00 PM	0	0	22
10:15 PM	0	0	36	10:15 PM	0	0	22
10:30 PM	0	0	36	10:30 PM	0	2	20
10:45 PM	0	1	35	10:45 PM	0	3	17
11:00 PM	0	2	33	11:00 PM	1	0	18
11:15 PM	0	1	32	11:15 PM	0	1	17
11:30 PM	0	0	32	11:30 PM	0	0	17
11:45 PM	0	2	30	11:45 PM	0	0	17
Totals	208	210	Totals	223	232		

Parking Occupancy Assumptions

Total Spaces	197	
Survey Date	2/2/2021	2/3/2021
% Spaces Occupied at 12AM*	16%	13%
# Spaces Occupied at 12AM	32	26

*An estimate of the number of spaces occupied at the beginning of the study must be determined to approximate parking demand. 16 Spaces occupied at 12AM is estimated assuming that parking occupancy would not fall below 0 at any time during the study period

Peak Parking Demand over two-day period: 112

Fender Warehouse

297,850 SF

Tuesday, February 2, 2021		Wednesday, February 3, 2021	
Peak Demand (spaces)	Observed Parking Ratio	Peak Demand (spaces)	Observed Parking Ratio
112	1 space per 2660 SF	111	1 space per 2684 SF

27081 Almond Avenue |2AM Logistics BMW Parts Distribution Center|

TOTAL (all driveways)

TIME	Tuesday, February 2, 2021 Cars In	Cars Out	TIME	Wednesday, February 3, 2021 Cars In	Cars Out
12:00 AM	0	0	12:00 AM	0	0
12:15 AM	0	0	12:15 AM	0	0
12:30 AM	0	0	12:30 AM	0	0
12:45 AM	0	0	12:45 AM	0	0
1:00 AM	0	0	1:00 AM	0	0
1:15 AM	0	0	1:15 AM	0	0
1:30 AM	0	0	1:30 AM	0	0
1:45 AM	1	0	1:45 AM	0	0
2:00 AM	1	0	2:00 AM	2	0
2:15 AM	0	0	2:15 AM	0	0
2:30 AM	0	0	2:30 AM	2	0
2:45 AM	0	0	2:45 AM	1	0
3:00 AM	1	0	3:00 AM	1	1
3:15 AM	0	0	3:15 AM	0	1
3:30 AM	15	0	3:30 AM	0	0
3:45 AM	19	0	3:45 AM	19	0
4:00 AM	3	0	4:00 AM	3	0
4:15 AM	1	0	4:15 AM	1	0
4:30 AM	0	0	4:30 AM	1	0
4:45 AM	1	0	4:45 AM	0	1
5:00 AM	0	1	5:00 AM	0	0
5:15 AM	0	0	5:15 AM	0	0
5:30 AM	0	0	5:30 AM	0	1
5:45 AM	0	0	5:45 AM	2	1
6:00 AM	0	0	6:00 AM	1	1
6:15 AM	0	0	6:15 AM	2	0
6:30 AM	0	2	6:30 AM	0	0
6:45 AM	2	1	6:45 AM	1	1
7:00 AM	2	1	7:00 AM	0	0
7:15 AM	1	1	7:15 AM	2	1
7:30 AM	0	0	7:30 AM	1	1
7:45 AM	0	0	7:45 AM	1	1
8:00 AM	3	1	8:00 AM	1	3
8:15 AM	1	4	8:15 AM	3	1
8:30 AM	2	2	8:30 AM	0	0
8:45 AM	0	1	8:45 AM	1	2
9:00 AM	2	5	9:00 AM	0	0
9:15 AM	2	2	9:15 AM	0	2
9:30 AM	0	0	9:30 AM	1	2
9:45 AM	1	2	9:45 AM	2	2
10:00 AM	1	1	10:00 AM	0	2
10:15 AM	0	0	10:15 AM	1	0
10:30 AM	1	1	10:30 AM	0	1
10:45 AM	3	4	10:45 AM	3	3
11:00 AM	1	2	11:00 AM	0	1
11:15 AM	0	0	11:15 AM	1	0
11:30 AM	1	2	11:30 AM	1	0
11:45 AM	2	1	11:45 AM	1	0
12:00 PM	1	1	12:00 PM	1	1
12:15 PM	0	3	12:15 PM	0	3
12:30 PM	14	46	12:30 PM	8	39
12:45 PM	23	1	12:45 PM	30	1
1:00 PM	3	1	1:00 PM	2	0
1:15 PM	0	0	1:15 PM	2	0
1:30 PM	1	2	1:30 PM	0	3
1:45 PM	0	0	1:45 PM	0	0
2:00 PM	1	0	2:00 PM	0	1
2:15 PM	0	1	2:15 PM	0	0
2:30 PM	0	3	2:30 PM	0	0
2:45 PM	1	0	2:45 PM	0	0
3:00 PM	0	0	3:00 PM	0	0
3:15 PM	1	1	3:15 PM	1	0
3:30 PM	0	0	3:30 PM	1	0
3:45 PM	2	0	3:45 PM	2	2
4:00 PM	0	1	4:00 PM	1	2
4:15 PM	0	0	4:15 PM	0	0
4:30 PM	0	0	4:30 PM	0	0
4:45 PM	1	2	4:45 PM	1	1
5:00 PM	2	3	5:00 PM	1	3
5:15 PM	2	1	5:15 PM	2	3
5:30 PM	2	3	5:30 PM	4	3
5:45 PM	2	2	5:45 PM	3	0
6:00 PM	2	0	6:00 PM	0	1
6:15 PM	0	2	6:15 PM	0	0
6:30 PM	1	0	6:30 PM	0	0
6:45 PM	0	0	6:45 PM	0	0
7:00 PM	1	2	7:00 PM	0	0
7:15 PM	1	0	7:15 PM	0	0
7:30 PM	3	1	7:30 PM	4	0
7:45 PM	0	0	7:45 PM	1	0
8:00 PM	1	0	8:00 PM	0	1
8:15 PM	1	0	8:15 PM	0	0
8:30 PM	1	0	8:30 PM	2	0
8:45 PM	1	2	8:45 PM	1	1
9:00 PM	0	2	9:00 PM	2	1
9:15 PM	0	2	9:15 PM	0	0
9:30 PM	0	34	9:30 PM	0	34
9:45 PM	0	1	9:45 PM	1	1
10:00 PM	1	0	10:00 PM	0	0
10:15 PM	0	0	10:15 PM	0	0
10:30 PM	0	0	10:30 PM	0	0
10:45 PM	0	0	10:45 PM	0	0
11:00 PM	0	0	11:00 PM	0	0
11:15 PM	0	0	11:15 PM	0	0
11:30 PM	0	0	11:30 PM	0	0
11:45 PM	0	0	11:45 PM	0	0
Totals	149	161	Totals	142	145

Parking Occupancy & Demand - [illegible] (all driveways)

TIME	Tuesday, February 2, 2021 Cars In	Cars Out	Parking Occupied	TIME	Wednesday, February 3, 2021 Cars In	Cars Out	Parking Occupied
12:00 AM	0	0	0	12:00 AM	0	0	0
12:15 AM	0	0	0	12:15 AM	0	0	0
12:30 AM	0	0	0	12:30 AM	0	0	0
12:45 AM	0	0	0	12:45 AM	0	0	0
1:00 AM	0	0	0	1:00 AM	0	0	0
1:15 AM	0	0	0	1:15 AM	0	0	0
1:30 AM	0	0	0	1:30 AM	0	0	0
1:45 AM	1	0	1	1:45 AM	0	0	0
2:00 AM	1	0	2	2:00 AM	2	0	2
2:15 AM	0	0	2	2:15 AM	0	0	2
2:30 AM	0	0	2	2:30 AM	2	0	4
2:45 AM	0	0	2	2:45 AM	1	0	5
3:00 AM	1	0	3	3:00 AM	1	1	5
3:15 AM	0	0	3	3:15 AM	0	1	4
3:30 AM	15	0	18	3:30 AM	0	0	4
3:45 AM	19	0	37	3:45 AM	19	0	23
4:00 AM	3	0	40	4:00 AM	3	0	26
4:15 AM	1	0	41	4:15 AM	1	0	27
4:30 AM	0	0	41	4:30 AM	0	0	27
4:45 AM	1	0	42	4:45 AM	0	1	26
5:00 AM	0	1	41	5:00 AM	0	0	26
5:15 AM	0	0	41	5:15 AM	0	0	26
5:30 AM	0	0	41	5:30 AM	0	1	25
5:45 AM	0	0	41	5:45 AM	2	1	26
6:00 AM	0	0	41	6:00 AM	1	1	26
6:15 AM	0	0	41	6:15 AM	2	0	28
6:30 AM	0	2	39	6:30 AM	0	0	28
6:45 AM	2	1	40	6:45 AM	1	1	28
7:00 AM	2	1	41	7:00 AM	0	0	28
7:15 AM	1	1	41	7:15 AM	2	1	29
7:30 AM	0	0	41	7:30 AM	1	1	29
7:45 AM	0	0	41	7:45 AM	1	1	29
8:00 AM	3	1	43	8:00 AM	1	3	27
8:15 AM	1	4	40	8:15 AM	3	1	29
8:30 AM	2	2	40	8:30 AM	0	3	26
8:45 AM	0	1	39	8:45 AM	1	2	25
9:00 AM	2	5	36	9:00 AM	0	0	25
9:15 AM	2	2	36	9:15 AM	0	2	23
9:30 AM	0	0	36	9:30 AM	1	2	22
9:45 AM	1	2	35	9:45 AM	2	2	22
10:00 AM	1	1	35	10:00 AM	0	2	20
10:15 AM	0	0	35	10:15 AM	1	0	21
10:30 AM	1	1	35	10:30 AM	0	1	20
10:45 AM	3	4	34	10:45 AM	3	3	20
11:00 AM	1	2	33	11:00 AM	0	1	19
11:15 AM	0	0	33	11:15 AM	1	0	20
11:30 AM	1	2	32	11:30 AM	1	5	16
11:45 AM	2	1	33	11:45 AM	1	0	17
12:00 PM	1	1	33	12:00 PM	1	1	17
12:15 PM	0	3	30	12:15 PM	0	3	14
12:30 PM	14	46	2	12:30 PM	8	39	3
12:45 PM	23	1	24	12:45 PM	30	1	32
1:00 PM	3	1	26	1:00 PM	2	0	34
1:15 PM	0	0	26	1:15 PM	2	0	36
1:30 PM	1	2	25	1:30 PM	0	3	33
1:45 PM	0	0	25	1:45 PM	0	0	33
2:00 PM	1	0	26	2:00 PM	0	1	32
2:15 PM	0	1	25	2:15 PM	0	0	32
2:30 PM	0	3	22	2:30 PM	0	0	32
2:45 PM	1	0	23	2:45 PM	0	0	32
3:00 PM	0	0	23	3:00 PM	0	0	32
3:15 PM	1	1	23	3:15 PM	1	0	33
3:30 PM	0	0	23	3:30 PM	1	0	34
3:45 PM	2	0	25	3:45 PM	2	2	34
4:00 PM	0	1	24	4:00 PM	1	2	33
4:15 PM	0	0	24	4:15 PM	0	0	33
4:30 PM	0	0	24	4:30 PM	0	0	33
4:45 PM	1	2	23	4:45 PM	1	1	33
5:00 PM	2	3	22	5:00 PM	1	3	31
5:15 PM	2	1	23	5:15 PM	2	3	30
5:30 PM	2	3	22	5:30 PM	4	3	31
5:45 PM	2	2	22	5:45 PM	3	0	34
6:00 PM	2	0	24	6:00 PM	0	1	33
6:15 PM	0	2	22	6:15 PM	0	0	33
6:30 PM	1	0	23	6:30 PM	0	0	33
6:45 PM	0	0	23	6:45 PM	0	0	33
7:00 PM	1	2	22	7:00 PM	0	0	33
7:15 PM	1	0	23	7:15 PM	0	0	33
7:30 PM	3	1	25	7:30 PM	4	0	37
7:45 PM	0	0	25	7:45 PM	1	0	38
8:00 PM	1	0	26	8:00 PM	0	1	37
8:15 PM	1	0	27	8:15 PM	1	0	38
8:30 PM	1	0	28	8:30 PM	2	0	40
8:45 PM	1	2	27	8:45 PM	1	1	40
9:00 PM	0	2	25	9:00 PM	0	2	38
9:15 PM	0	2	23	9:15 PM	0	0	38
9:30 PM	0	34	2	9:30 PM	0	34	4
9:45 PM	0	1	1	9:45 PM	0	1	3
10:00 PM	1	0	2	10:00 PM	0	0	3
10:15 PM	0	0	2	10:15 PM	0	0	3
10:30 PM	0	0	2	10:30 PM	0	0	3
10:45 PM	0	0	2	10:45 PM	0	0	3
11:00 PM	0	0	2	11:00 PM	0	0	3
11:15 PM	0	0	2	11:15 PM	0	0	3
11:30 PM	0	0	2	11:30 PM	0	0	3
11:45 PM	0	0	2	11:45 PM	0	0	3
Totals	149	161		Totals	142	145	

Parking Occupancy assumptions

Total Spaces	174	
Survey Date	2/2/2021	2/3/2021
% Spaces Occupied at 12AM*	2%	2%
# Spaces Occupied at 12AM	4	4

* An estimate of the number of spaces occupied at the beginning of the study must be determined to approximate parking demand. If Spaces occupied at 12AM is estimated assuming that parking occupancy must not fall below 0 at any time during the study period.

Max Parking Demand over two-day period

55

2AM Logistics BMW Parts Distribution Center

326,920 SF

Tuesday, February 2, 2021		Wednesday, February 3, 2021	
Peak Demand (Spaces)	Observed Parking Ratio	Peak Demand (Spaces)	Observed Parking Ratio
55	1 space per 5416 SF	48	1 space per 6810 SF

Attachment 11

Variance Finding Memorandum

27372 CALLE ARROYO
SAN JUAN CAPISTRANO, CALIFORNIA 92675
T 949.450.2525 F 949.450.2626

MEMORANDUM

To:	Kim Stater, City of Highland
From:	Sean Kilkenny, Dudek
Subject:	6th and Victoria Warehouse Project – Minor Variance Findings
Date:	August 3, 2021
cc:	Kevin Rice, Patriot Development Partners

Patriot Development Partners (project applicant) proposes to construct and operate the 6th and Victoria Warehouse Project (project), an approximately 305,617-square-foot (gross area, inclusive of mezzanine/office spaces), one-story warehouse building on an approximately 12.3-acre site (gross area) at the northwestern corner of 6th Street and Victoria Avenue in the City of Highland, California (City).

To assist City with the entitlement process, this memorandum provides variance findings related to the issuance of a minor variance.

1 Variance Findings

The property has a zoning of BP (Business Park) within the Airport Influence Zone and a General Plan land use designation of Business Park (I-BP). Per the City's General Plan Land Use Element, warehousing is an allowed use in the existing Business Park land use designation. Per Table 16.24.030A of the Highland Municipal Code, warehousing uses are allowed in the BP zone with issuance of a Conditional Use Permit. The project proposes a warehouse 45 feet in height, which exceeds the maximum building height allowed in the BP zone by 10 feet. Therefore, a minor variance (30% increase or less) is being requested to accommodate the project's increase in height.

Certain findings are required of projects for prior to approval of the project and the issuance of a variance, as outlined below.

1. *That strict or literal interpretation and enforcement of the specified regulation would result in practical difficulty or unnecessary hardship not otherwise shared by others within the surrounding area or vicinity.*

   Under the existing development standards, the project would be permitted to have a maximum height of 35 feet. However, current tenants of warehouses similar to the proposed warehouse typically require internal clear heights[1] of 36 feet. After accounting for joists, lights, and sprinkler systems, modern warehouses require approximately 4-5 feet to reach the roof of the structure, followed by an additional 4-5 feet above the roof line to screen roof-mounted equipment, such as HVAC systems. As such, after taking into account the practical requirements for modern warehousing spaces, a 45-foot warehouse (as is the

[1] A building's clear height is defined as the usable height to which a tenant can store its product on racking. This figure is measured below any obstructions such as joists, lights or sprinklers.

case of the proposed project) is essentially the minimum height that would meet market demands. Further, should the project be developed with a clear height of 25 feet, the warehouse would lose approximately 30% of its storage space, severely hampering the usability of the space. In addition, the increase in height will enhance the architectural façade and provide additional articulation as viewed from the public right of way.

2. *That there are exceptional or extraordinary circumstances or conditions applicable to the property involved or the intended use of the property which do not apply generally to other properties in the vicinity and under the same zoning classification.*

   As described above, based on current best practices in warehousing, 35' is not sufficient for the intended use and would present a condition that would deprive the property of use as a warehouse. The intended use of the property involved is for warehousing purposes. Warehouses are permitted in the Business Park zone, subject to Design Review or a Conditional Use Permit. Similarly, warehouses are also permitted in the Industrial zone subject to Design Review per Table 16.24.030.A - Uses Permitted Within Employment Districts. However, per Table 16.24.040.A - Industrial Site Development Minimum Standards, the maximum height limit in the Industrial zone in 50'; therefore, the proposed 45' building height would be in conformance with similar employment district zones in the City.

3. *That the strict interpretation and enforcement of the specified regulation would deprive the applicant of privileges enjoyed by the owners of other properties in the vicinity and under the same zoning classification.*

   Please refer to above responses which notes that, while not the same zoning classification, the same permitted use (warehousing) is considered a permitted use in other Employment Districts in the City (i.e., the Industrial zone), at heights up to 50'. Further, it is noted that owners of other properties in neighboring jurisdictions including Redlands and San Bernardino are permitted up to 50' for buildings heights in industrial zones; therefore, strict interpretation of the specified regulation would deprive the applicant of privileges enjoyed by owners of other properties in the vicinity of the property with similar zoning classification.

4. *That the granting of the variance will not constitute a grant of special privilege inconsistent with the limitation on other properties in the vicinity and under the same zoning classification.*

   See above responses. Grading the variance will not grant a specific privilege inconsistent with limitations on other properties in the vicinity because other warehousing uses are permitted at heights of up to 50' either in the City (in Industrial zoned areas), or in adjacent cities.

5. *That the granting of the variance will not be detrimental to the public health, safety, or welfare, or materially injurious to properties or improvements in the vicinity.*

   The variance will not be detrimental to the public health, safety, or welfare; or materially injurious to properties or improvements in the vicinity because the property would be developed in accordance with the California Building Code (CBC) and all the rules, regulations, and requirements therein which would ensure the public's health, safety and welfare.

6. *That the granting of the variance is consistent with the objectives and policies of the general plan and the intent of this title.*

   Granting the variance will ensure the property is competitive with other properties to drive economic activity that will benefit the City, consistent with the General Plan. Specifically, granting the requested Variance is directly supported by Goal 9.1, Policy 2 which encourages the City to " Promote the expanded the Business Park and Industrial land use designations in the southern parts of the City to capture regional demand and growth potential from future airport development." By granting the Variance for a property in the southern part of the City near the airport, the City would be promoting and expanding the Business Park land use designation. Granting the Variance would also support Goal 2.14, Policy 6 by supporting the "[Creation of] a major business park node at the southern terminus of Victoria Avenue to maximize employment opportunities adjacent to the airport" because it would permit the proposed warehouse use base on market trends and best practices.

STAFF REPORT

TO THE PLANNING COMMISSION

DATE: December 21, 2021

FROM: Lawrence A. Mainez, Community Development Director

REVIEWED BY: Kim Stater, Assistant Community Development Director

PREPARED BY: Ash Syed, Associate Planner

SUBJECT: Design Review Application (DRA 21-017) for the exterior remodel of an existing Wendy's drive-thru restaurant including new signage, paint, and accent finishes.

LOCATION: 27879 Base Line, Highland CA 92346
Assessor's Parcel Number: 1201-091-55

APPLICANT: Wendy's

REPRESENTATIVE: Christopher Wadleigh

RECOMMENDATION: Staff recommends the Planning Commission:

1. Adopt Resolution 21-____ approving Design Review Application (DRA 21-017) for the exterior remodel of an existing Wendy's drive-thru restaurant including new signage, paint, and accent finishes, subject to the Conditions of Approval and Findings of Fact.

2. Direct staff to file a Notice of Exemption with the County Clerk of the Board of Supervisors.

FISCAL IMPACT: The Applicant submitted the required deposit for processing a Design Review Application. Staff time spent working on the applications is charged to this deposit.

PUBLIC NOTICE: As required by City Council Resolution, a notice of the public hearing was posted at the City's three designated posting locations within the City. A legal notice was posted on the City's website and mailed to property owners within 300 feet

Approved ____	Motion _____	Second _____	Agenda Item No. 3
Denied ____	Ayes _____		
	Noes _____		File No. _____
Continue ____	Abstain _____		
	Absent _____		

Kim Stater for
Recording Secretary

Lawrence Mainez
Community Development Director

of the project site. A legal advertisement was published in the Highland Community News on December 10, 2021. No further notice is required.

PUBLIC COMMENT: At the time of preparation of this Staff Report, no comments were received from the public by the Planning Division in response to the Project Notice.

DESCRIPTION OF SITE:

Location:

The project site is located at the southeast corner of the Base Line and Stoney Creek T-Junction and is composed of a single parcel of approximately 34,543 square feet (Exhibit A – Area Map).

Existing Building:

Currently, the property features a 3,215 square foot, single-story Wendy's restaurant that was constructed in late 2001. The building color consists of a primarily tan stucco exterior and darker taupe awnings with a bold, red trim along the northern and western exposure. The building also features a flat roof accented by the same red trim and sharp cornices spanning the perimeter of the roofline. The parking spaces for the restaurant are located around the boundary of the lot, along the Base Line frontage to the north and Stoney Creek Drive to the west. The restaurant features two (2) building-mounted signs attached to the building awnings fronting Base Line and Stoney Creek Drive respectively. The building itself along with operation logistics with regard to dining area, square footage, parking spaces, and the trash enclosure are all compliant with the City's development standards. The Applicant has proposed an exterior remodel to update and match the new corporate designs schemes (Exhibit B – Photos of Existing Building).

Surrounding Land Uses:

The City of Highland General Plan and Municipal Code designate the parcel as Planned Commercial (PC). The area is developed with a variety of commercial businesses to the north, south, and east, as well as single-family homes west of Stoney Creek Drive.

	Existing Use	*Land Use Designation*	*Zoning Designation*
Site	Wendy's Restaurant	Planned Commercial	Planned Commercial (PC)
North	Shopping Center	Office Professional	Office Professional (OP)
South	Shopping Center	Planned Commercial	Planned Commercial (PC)
West	Single Family Homes	Planned Commercial	Planned Commercial (PC)
East	AAA Auto Club	Planned Commercial	Planned Commercial (PC)

The proposed land use is consistent with the City of Highland General Plan and Municipal Code.

PROJECT REVIEW:

Exterior Modifications

The Applicant is proposing to modify the existing building color and design of the Wendy's restaurant building to reflect the updated corporate designs and color schemes. The updates include changing the warm-toned, tan stucco exterior to a modern "bone-white" finish around the perimeter of the building, accented by an aluminum trim along the roofline. Additional modifications to the northern frontage as well as the eastern and western entrances include a light brown vertical brick accent trim, bronze corrugated metal slats along the upper portion, and a bold red tower-like fascia on which the revised corporate signage will be mounted. The aforementioned eastern entrance, which is currently oriented to face south, will be repositioned sightly northward to accommodate a double-door design. The revised eastern entrance will also feature a modern bronze corrugated metal canopy (Exhibit C – Proposed Elevations).

On-Premise Signs

The Applicant is looking to replace the existing 1982-2012 Wendy's signs with the updated 2013-present design. Currently, there is no signage along the eastern face of the building where the drive-thru is located. The Applicant is proposing a new 3' x 10'8" "Wendy's" scripture and corporate logo to be placed along the bronze corrugated metal slats, above the existing windows toward the northeast corner of the site. The western façade, which currently features Wendy's signage mounted on the awning, will feature a new 6'8" x 8'4" corporate sign just above the new eastern entrance and awning. The northern face of the building, which also currently features Wendy's signage mounted to the awning, will feature a new 3' x 10'8" "Wendy's" scripture and logo as well.

In compliance with further corporate design updates, the Applicant is proposing a new 6' 2" x 2'2" menu board and a 7' 2" x 9" menu board with swiveling panels at the ordering station within the drive-thru lane. Additionally, a new vertical "3'6" x 7" "Thank You" sign is to be placed just after the drive-thru window, enroute to the exit. Lastly, the existing faceplates on the monument sign along Base Line as well as the directional signs along the drive-thru aisle will be replaced with the updated corporate designs.

Further changes to the existing site include a new 9' tall pivoting canopy in the drive aisle, finished in a classic bronze color, and a vehicle height detector, placed at the entrance to the drive aisle (Exhibit D – Signs and Canopies).

The following excerpt from the Highland Municipal Code Chapter 16.56 (Sign Regulations Table 16.56.070.A identifies the design criteria for Building Mounted Identification Signs.

Building-Mounted Primary Identification Signs

Maximum Number	Maximum Sign Area	Maximum Height	Proposed New Signs
a) 1 per street frontage. b) Up to 3 street frontages.	a) The total aggregate area of wall sign(s), including the area of awning signs or similar signs affixed to the building elevation, shall not exceed 10% of the storefront to which such sign(s) is attached, or 100 square feet, whichever is less. b) Sign length shall be no more than 75% of the business frontage.	Signs shall not be mounted above the roof line.	Two (2) total Wendy's logos and scriptures on the building. a) Since the "Wendy's" scripture and corresponding 'Wendy' image are complementary, they shall be considered 1 sign. b) North side signage sqft – *Total signage area: 32.14 sqft* *Total frontage area: 803.4 sqft* ***Percentage of storefront area: 4%*** *Total sign length: 10'8"* *Total frontage length: 40'2"* ***Percentage of storefront length: 26.6%*** c) West side signage sqft – *Total signage area: 55.56 sqft* *Total frontage area: 1,838.03 sqft* ***Percentage of storefront area: 3%*** *Total sign length: 8'4"* *Total frontage length: 89'8"* ***Percentage of storefront length: 9.3%***

Building-Mounted Secondary Identification Signs

Maximum Number	Maximum Sign Area	Maximum Height	Proposed New Signs
a) 1 per parking lot frontage.	a) The total aggregate area of wall sign(s), including the area of awning signs or similar signs affixed to the building elevation, shall not exceed 2.5% of the	Signs shall not be mounted above the roof line.	One (1) total Wendy's logo and scripture on the building. a) Since the "Wendy's" scripture and corresponding 'Wendy' image are complementary, they shall be considered 1 sign.

Maximum Number	Maximum Sign Area	Maximum Height	Proposed New Signs
	area of the face of the building to which such sign(s) is attached.		b) East side signage sqft – *Total signage area: 32.14 sqft* *Total frontage area: 1,838.03 sqft* ***Percentage of storefront area: 1.75%*** *Total sign length: 10'8"* *Total frontage length: 89'8"* ***Percentage of storefront length: 4%***

ENVIRONMENTAL REVIEW: This project is Categorically Exempt from environmental proceedings under the California Environmental Quality Act (CEQA) guidelines pursuant to Section 15301, Class 1. Existing Facilities as it consists of the operation, repair, maintenance, permitting and minor alteration of a private structure.

ANALYSIS: The subject property contains an existing and operational Wendy's drive-thru and sit-down restaurant. While the existing building has been well maintained over the past 20 years, the Applicant is looking to update the overall appearance of the building with the newest corporate logos and design schemes. According to Section 16.56.070 of the Highland Municipal Code regarding Sign Regulations, a business may have one (1) primary building-mounted sign, per street frontage, spanning up to 10% of each respective frontage, and one (1) secondary building-mounted sign that shall not exceed 2.5% of the building frontage. In compliance with the primary building-mounted sign criteria of the code, the Applicant has proposed 4% of sign coverage on the north side and 3% of sign coverage on the west side. Additionally, the Applicant has proposed 1.75% of sign coverage on the east side of the building, satisfying the standards for secondary signs.

While no planting plan or landscape related improvements have been proposed as part of this redesign, it is Staff's concern that it will be rather difficult to preserve the foundation planting around the building once construction on the facades commences. Thus, the project has been conditioned to include new plant material within the areas between the building and the surrounding drive aisle / drive-thru lane. A separate condition has also been added to require the installment of landscaping across the bare soil frontage along Base Line to address current deficits in the landscape planter.

Additionally, the trash enclosure on the property does not currently feature a roof or any sort of top cover. The project has been conditioned to install a solid roof along with a mesh cover on the enclosure in compliance with updated City requirements.

The aesthetics of the building have been reviewed by City Staff and designed to satisfy the corporate design schemes. Thus, Staff recommends approval of the signage and

exterior remodel, subject to the Findings of Fact and Conditions of Approval (Attachment 1 – Resolution 2021 – _____ for Design Review Application (DRA 21-017).

EXHIBITS:

A – Aerial Location Map
B – Photos of Existing Building
C – Proposed Elevations
D – Signs and Canopies

ATTACHMENTS:

1. Resolution 2021 – ____ Design Review Application (DRA 21-017)
   Exhibit 1: Conditions of Approval

Exhibit A:

Aerial Location Map


N
Baseline St
Boulder Ave
Boulder Ave
Stoney Creek Dr
Stoney Creek Dr
Fitness 19

Exhibit B:

Photos of Existing Building


OPEN UNTIL 1 AM
$5


Wendy's



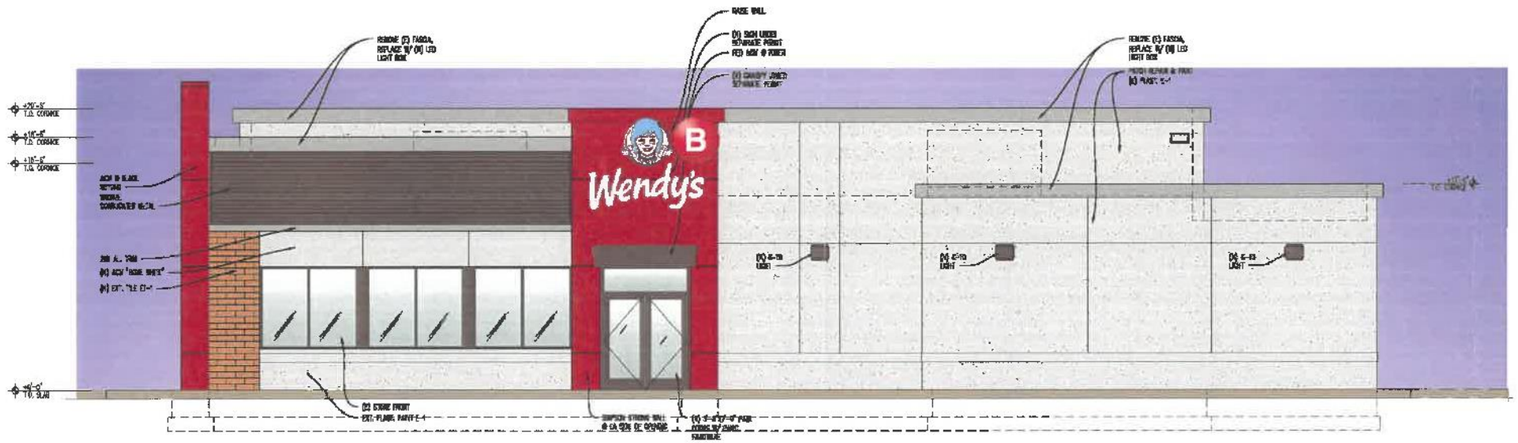

DEAL
EXIT ONLY
STOP

Exhibit C:

Proposed Elevations



1 NORTH ELEVATION
1/4" = 1'-0"



2 WEST ELEVATION
1/4" = 1'-0"

Sign Schedule

- B Channel Letters & Cameo - 42" White - Flush Mount
- C E2000 Blade Wall Downlight Kit 36"

NUMBER:	08280
NG TYPE:	E2000
TYPE:	FREESTANDING
IFICATION:	REFRESH
	COTTI FOODS
ERSION:	2020 SUMMER
DE CLASSIFICATION:	N/A
GT YEAR:	2021
TYPE:	(2.0) UM BRIGHT
NG RELEASE:	SUMMER 2020

ARMÉT DAVIS NEWLOVE & ASSOCIATES, AIA ARCHITECTS

PROJECT TYPE: E2000 REFRESH

Wendy's
#08280
27879 BASELINE AVE.
HIGHLAND, CA, 92346

EXTERIOR ELEVATIONS

A2.1

Customer/Site No: 08280	Prepared By: Joshua Lange	
Address: 27879 BASELINE AVE. HIGHLAND, CA 92346	Date: 10/26/2021	PIF: 456382-2
Description: WENDY'S #8280	Customer Signature:	

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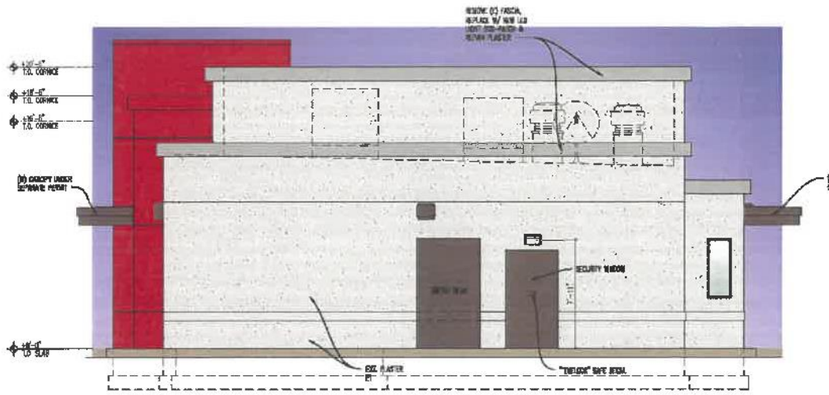
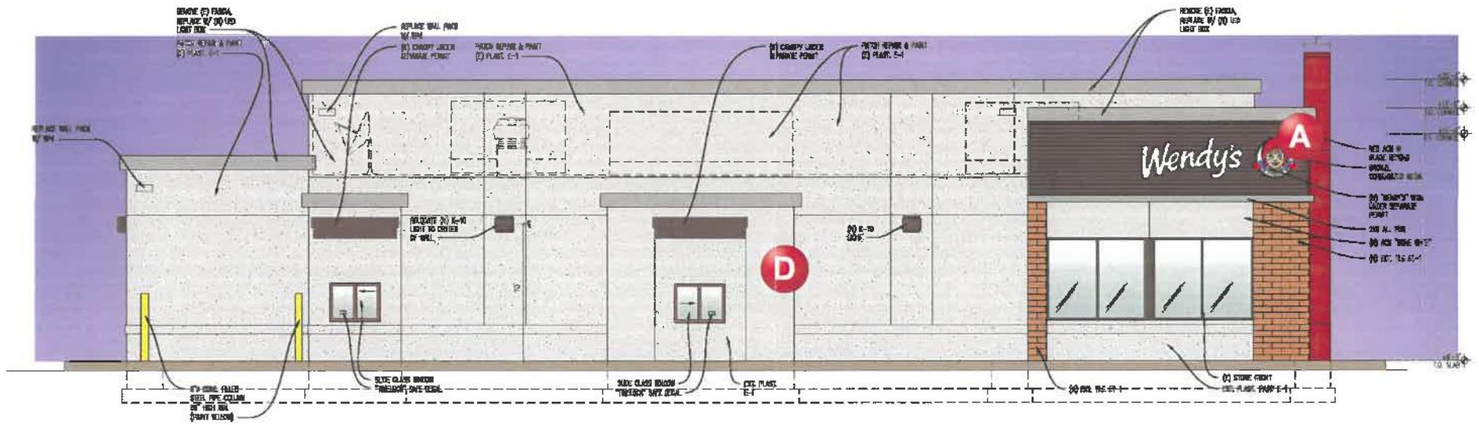


1 SOUTHTH ELEVATION
1/4" = 1'-0"

Sign Schedule

- A Channel Letters & Cameo - 36" White - Flush Mount
- D Wall Sign - 3'6"x7" - Thank You



2 EAST ELEVATION
1/4" = 1'-0"

SITE NUMBER:	04280
BUILDING TYPE:	E2000
ASSET TYPE:	FREESTANDING
CLASSIFICATION:	REFRESH
OWNER:	DOTTY FOODS
BASE VERSION:	2020 SUMMER
UPGRADE CLASSIFICATION:	N/A
PROJECT YEAR:	2021
DESIGN TYPE:	E2000 SM BRIGHT
DRAWING RELEASE:	SUMMER 2020

ARMET DAVIS NEWLOVE & ASSOCIATES, AIA ARCHITECTS

PROJECT TYPE: E2000 REFRESH

Wendy's

#08280
27879 BASELINE AVE.
HIGHLAND, CA. 92346

EXTERIOR ELEVATIONS

A2.2

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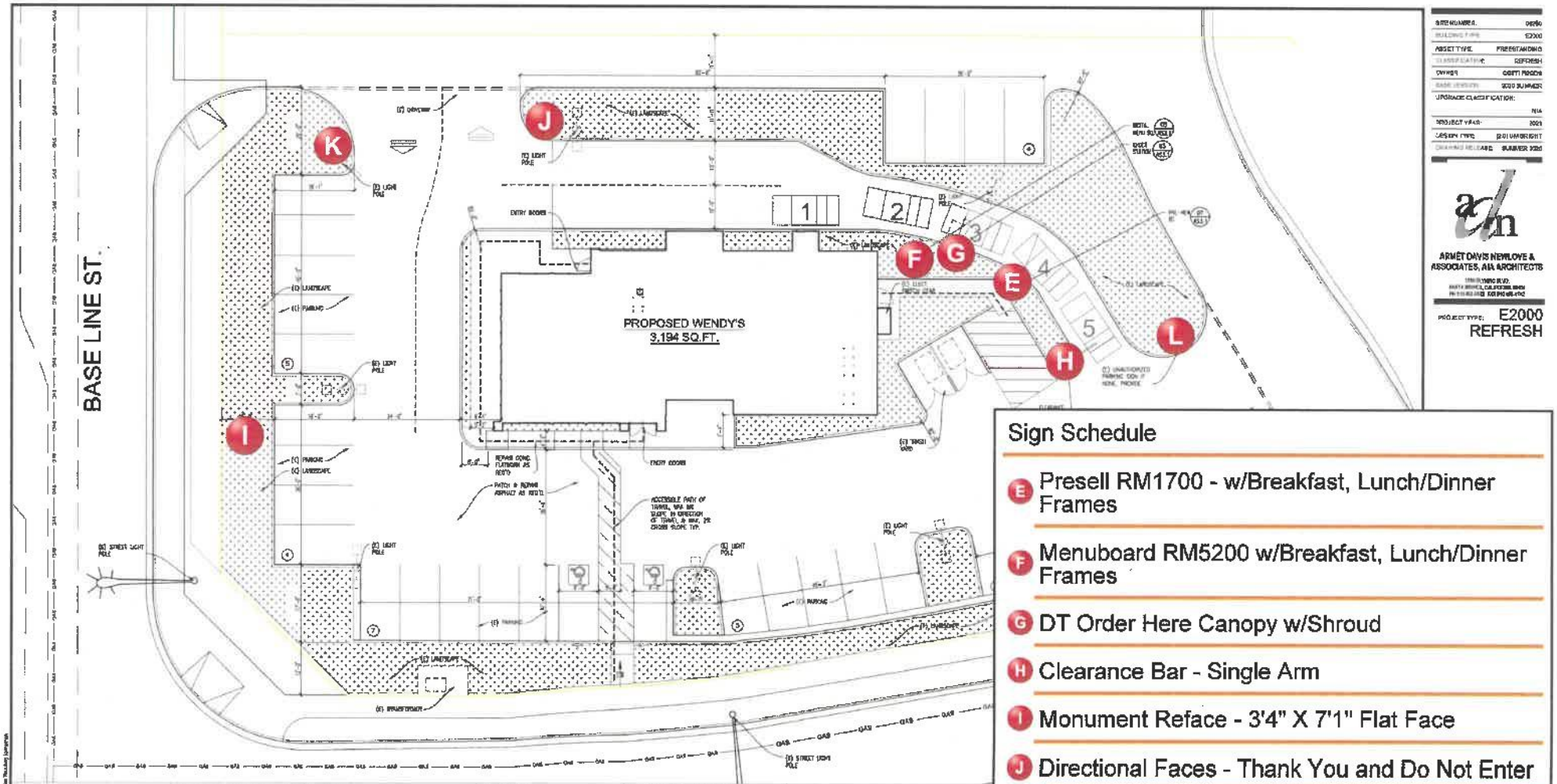
Exhibit D:

Signs and Canopies



Sign Schedule

- E Presell RM1700 - w/Breakfast, Lunch/Dinner Frames
- F Menuboard RM5200 w/Breakfast, Lunch/Dinner Frames
- G DT Order Here Canopy w/Shroud
- H Clearance Bar - Single Arm
- I Monument Reface - 3'4" X 7'1" Flat Face
- J Directional Faces - Thank You and Do Not Enter
- K Directional Faces - Enter Set
- L Directional Faces - Pick Up Window Set

SITE NUMBER:	08280
BUILDING TYPE:	E2000
ASSET TYPE:	FREESTANDING
CLASSIFICATION:	REFRESH
OWNER:	COSTI FINCO
BASE VERSION:	2020 SUMMER
UPGRADE CLASSIFICATION:	N/A
PROJECT YEAR:	2021
DESIGN TYPE:	2021 UNDERIGHT
DRAWING RELEASE:	SUMMER 2020

ARMET DAVIS NEWLOVE & ASSOCIATES, AIA ARCHITECTS

PROJECT TYPE: E2000 REFRESH

SITE PLAN

AS1.1

SITE INFO

APN:	1201091000000
LOT AREA:	34,817 SQ. FT. APPROX.
BUILDING AREA:	3,194 SQ. FT. (9.2%)
LANDSCAPE AREA:	7,830 SQ. FT. (21%)
TOTAL SEATS:	65
CONSTRUCTION TYP.:	1/2 – NON SPRINKLERED
OCCUPANCY:	A2

SITE PLAN GENERAL NOTES

1. REVIEW CONDITION OF EXISTING CONCRETE FLAT WORK AND CURB, REPAIR AS REQUIRED. SEE DETAILS 1 THRU 4 ON SHEET C2 FOR CONCRETE CURB AND FLATWORK.
2. NEW CONCRETE FLATWORK TO HAVE #4'S AT 16" O.C. E.W. OVER 2" OF SAND.
3. REVIEW CONDITION OF EXISTING ASPHALT PAVING AND CONCRETE FLATWORK AT DRIVE THRU LANE AND PARKING LOT, REPAIR AS REQUIRED. ENTIRE LOT TO RECEIVE NEW SLURRY COAT.
4. RE-STRIPE PARKING SPACES AND DIRECTIONAL ARROWS.
5. REVIEW CONDITION OF EXISTING LAWN, TREES, SHRUBS, PLANTING BEDS, LANDSCAPE TIES, FENCES AND DECORATIVE WALLS AND IRRIGATIONS SYSTEMS AND REPAIR AS REQUIRED.
6. SEE DETAILS 1 AND 2 ON SHEET C2 FOR CONCRETE CURB AT WALKWAY AND LANDSCAPE.
7. SEE DETAILS 3 AND 4 ON SHEET C2 FOR CONCRETE FLATWORK TOOL JOINT AND EXPANSION JOINT.
8. CURB RAMPS SHALL BE MAXIMUM 8" HIGH AND 6'-0" LONG WITH MAXIMUM 1:12 SLOPE.
9. ACCESSIBILITY DETAILS ARE LISTED ON SHEET C2 FOR COMPLIANCE PURPOSES. VERIFY ALL ITEMS AND IF NONE EXIST, PROVIDE IF CHANGED/ADDED/ADDABLE OR NON-COMPLIANT, REPLACE.
10. THE PARKING SLOPE OF WALKING SURFACES SHALL NOT BE STEEPER THAN 1:20. THE CROSS SLOPE OF WALKING SURFACES SHALL NOT BE STEEPER THAN 1:48. (11B-403.3)
11. SURFACE SLOPES OF ACCESSIBLE PARKING SPACES AND ACCESS AISLES SERVING THEM SHALL NOT BE STEEPER THAN 1:48. ACCESS AISLES SHALL BE AT THE SAME LEVEL AS THE PARKING SPACES THEY SERVE. CHANGE 5 IN LEVEL ARE NOT PERMITTED. (11B-302.4)
12. DETECTABLE WARNING PRODUCT APPROVAL - ONLY APPROVED VERSION OF THE STATE ARCHITECT, ACCESS COMPLIANCE (DSA/AC) APPROVED DETECTABLE WARNING PRODUCTS AND DIRECTIONAL SURFACES SHALL BE INSTALLED IN ACCORDANCE WITH CBC SECTION 118-705. THE EXCEPTION FOR RAMPS STEEPER THEN 1:15 NO LONGER APPLIES.
13. PROVIDE UNAUTHORIZED VEHICLES IN ACCESSIBLE PARKING SPACE IF NONE EXIST. SEE DETAIL E2 ON SHEET C2.

LEGEND

= NEW CONC. FLATWORK

= EXIST. LANDSCAPE

PARKING ANALYSIS

EXISTING PARKING STALLS

REGULAR	30 STALLS
ACCESSIBLE	5 STALLS
TOTAL	32 STALLS

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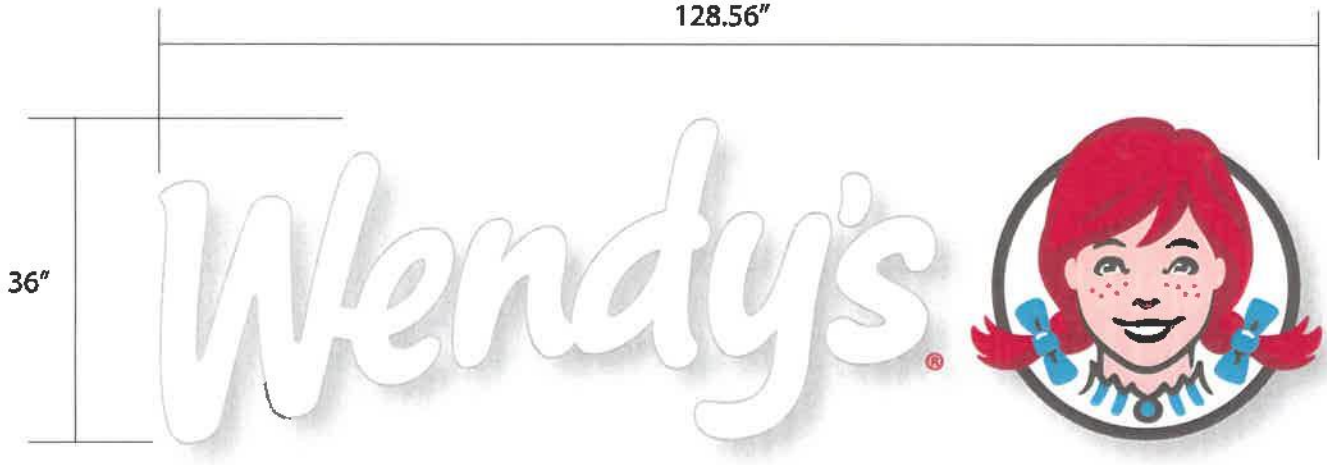
Channel Letters & Cameo - 36" White - Flush Mount (E031869)



ILLUMINATION: LED

ELECTRICAL: .8 Amps

POWER SUPPLY: (1) PS12-60w 100-277v-ENC

CAMEO:
CAP OVER FORMED POLY FACES GRAPHICS APPLIED TO SECOND SURFACE
ALUMINUM RETURNS w/ DK. BRONZE FINISH
INTERNALLY ILLUMINATED w/ WHITE LEDs

LETTERS:
CAP OVER FORMED WHITE POLY FACES
ALUMINUM RETURNS w/ DK. BRONZE FINISH
INTERNALLY ILLUMINATED w/ WHITE LEDs

COLORS:

PMS 186c
PMS 698c
PMS 201c
PMS 299c
PMS 439c

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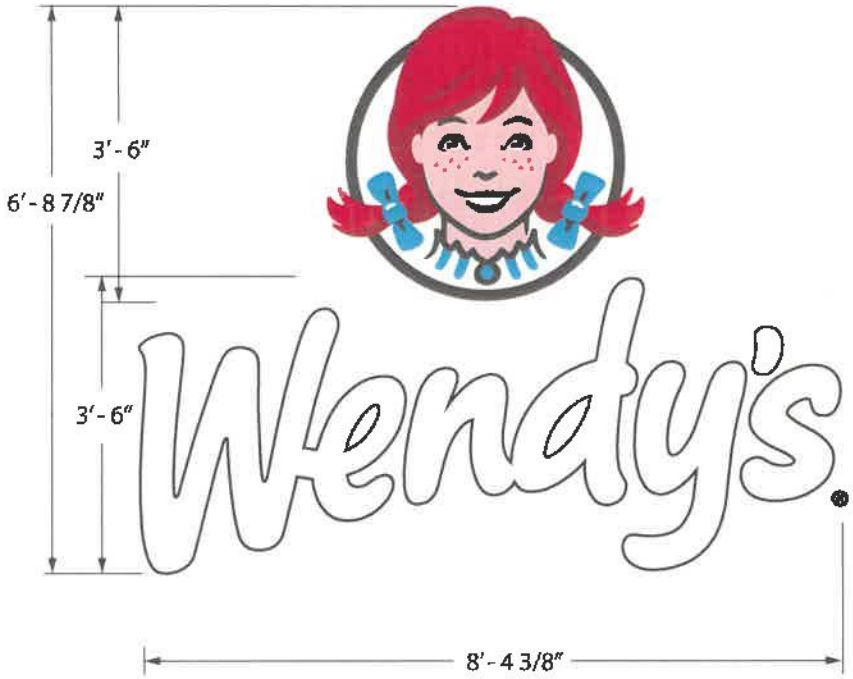

ILLUMINATION: LED

ELECTRICAL: .8 Amps

POWER SUPPLY: (1) PS12-60w 100-277v-ENC

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CAP OVER FORMED POLY FACES GRAPHICS APPLIED TO SECOND SURFACE
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ALUMINUM RETURNS w/ DK. BRONZE FINISH
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PMS 201c
PMS 299c
PMS 439c

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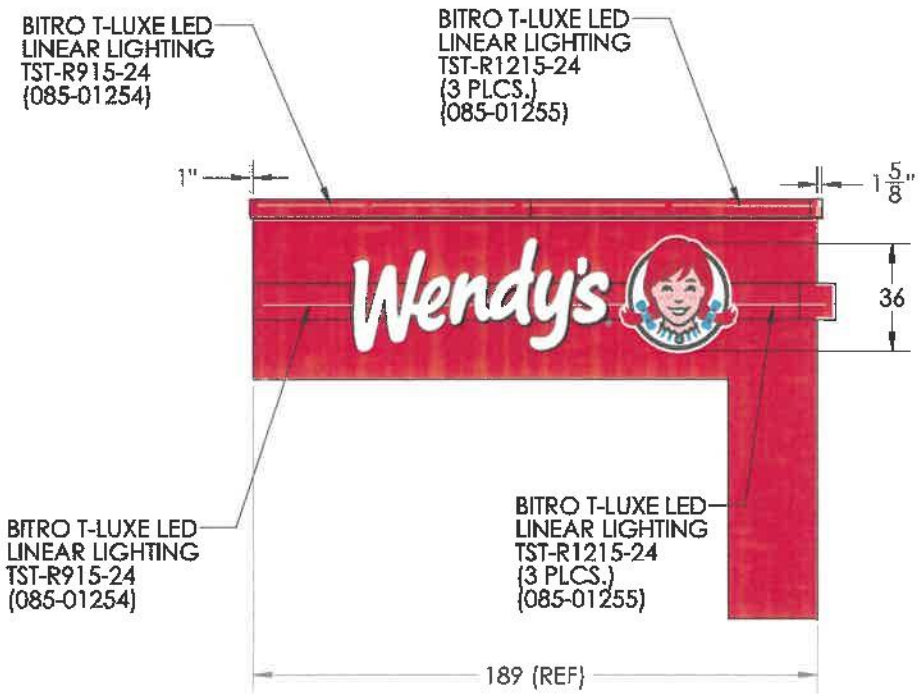

Flag Blade Downlight

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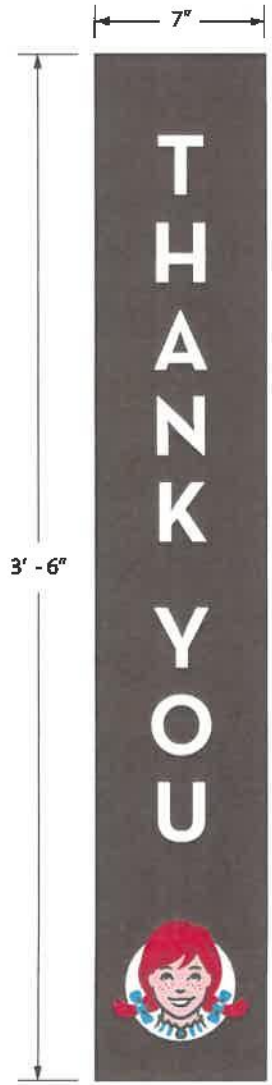
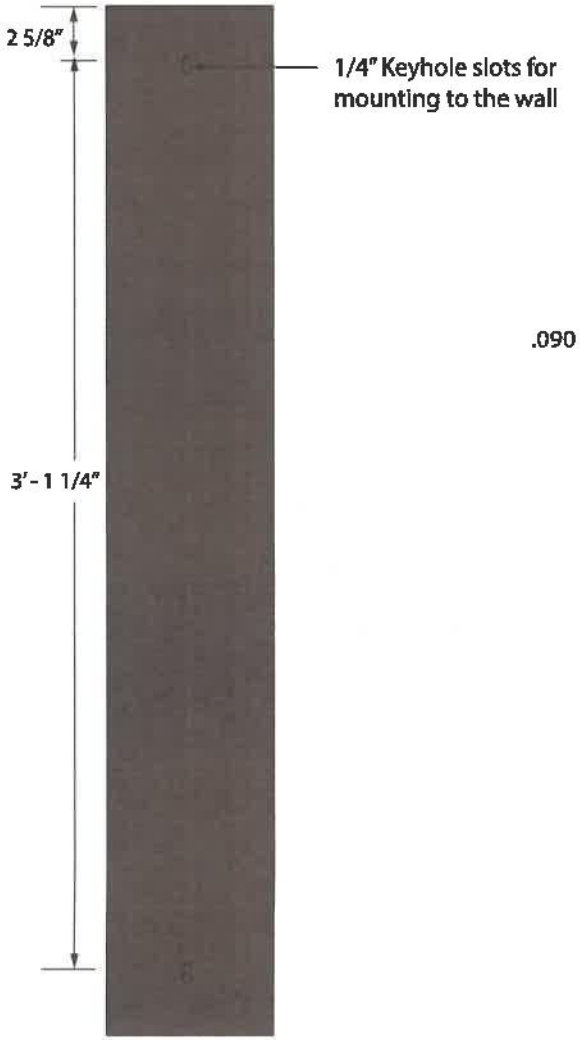
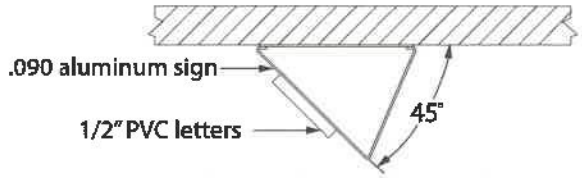
Wall Sign - 3'6"x7" - Thank You (E01303S)

2.04 sq.ft. nearest rectangle.





Back View



SPECIFICATIONS

Non-illuminated with stand off copy

COLORS & FINISHES

Brown (PMS 439C - outline)
Blue (PMS 299C - bow, shirt, brooch)
Flesh (PMS 698C - face, neck)
Red (PMS 186C - hair)
Dark Red (PMS 201C - hair outline)
White (text, cameo face)
Dark Bronze #313 (aluminum sign background)

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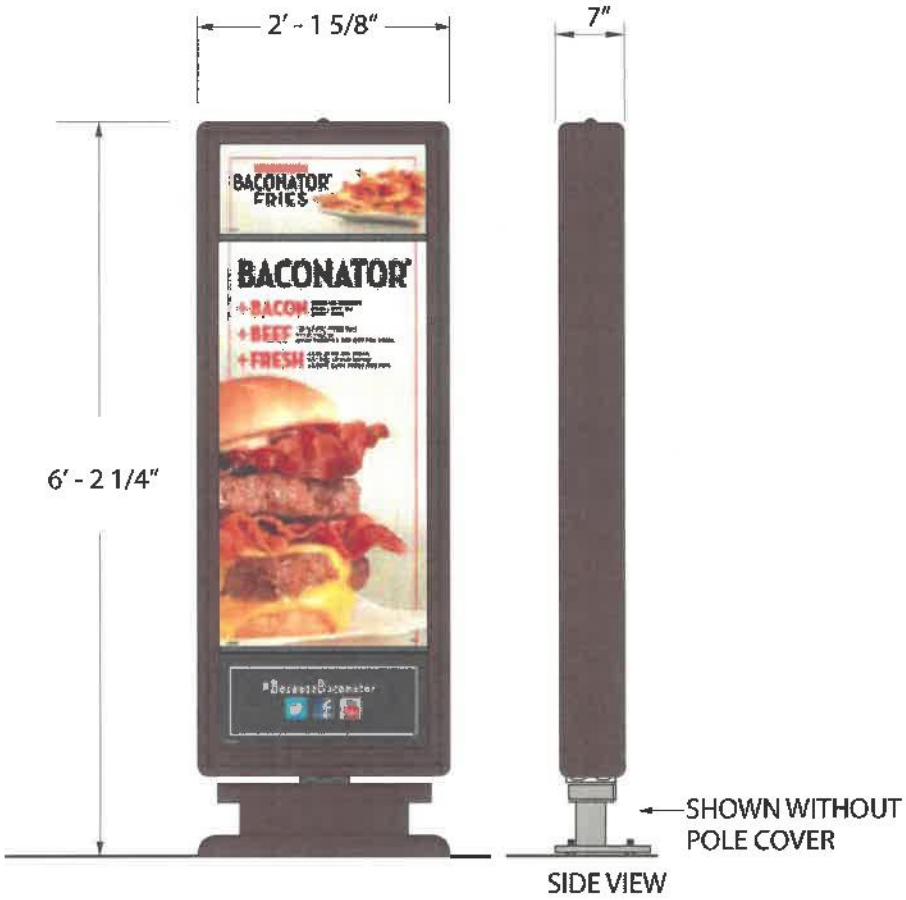
PRESELL MENUBOARD RM1700



- **WEIGHT:** 172 LBS
- **SQUARE FOOTAGE:** BOXED = 13.13
  ACTUAL = 12.9
- **ILLUMINATION:** LED
- **ELECTRICAL:** (2) 64" LED LIGHT BARS, 5,000K, 26.4W/EA BAR (076-00185)
  (1) 12V, 60W GLED SLIM POWER SUPPLY (062-00036)
- **COLORS:** CABINETS & POLE COVER-MATTHEWS- CLASSIC BRONZE
- **PANEL ROTATES**
- **ANCHOR BOLTS:** SIZE = 1/2" x 24"
  QTY = 3
  PATTERN = SEE INSTALL DRAWING



OPTIONAL REMOVABLE METAL BLACKOUT LINER AVAILABLE IF BREAKFAST IS NOT BEING SERVED. WILL NOT WARP OR FADE

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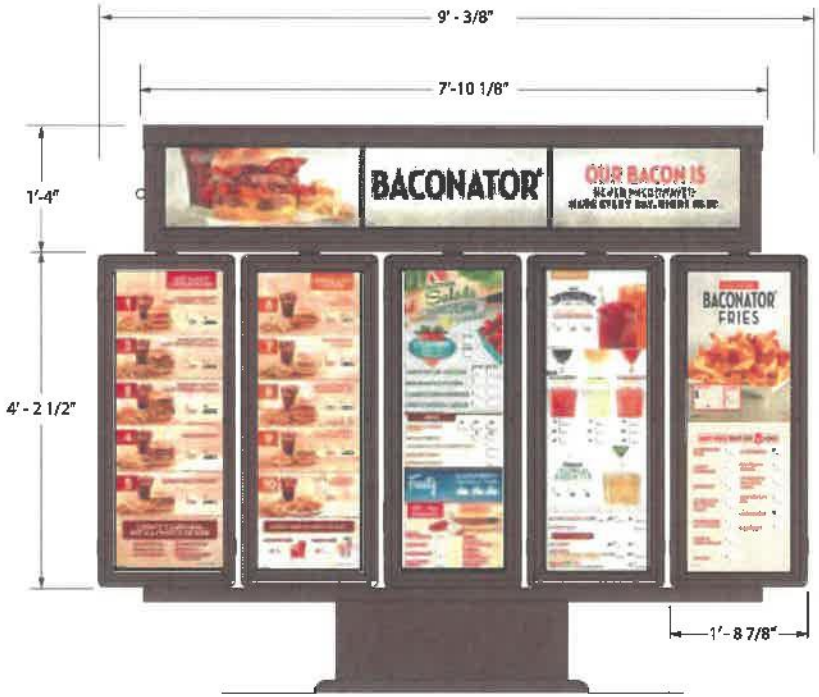
MENUBOARD RM5200



- **WEIGHT:** 590 LBS
- **SQUARE FOOTAGE:** BOXED = 51.93
  ACTUAL = 55.88
- **ILLUMINATION:** LED
- **ELECTRICAL:** (10) 48" LED LIGHT BARS, 5,000K, 18.5W/EA BAR (076-00179)
  (1) 84" LED LIGHT BAR, 5,000K, 34.3W (076-00191)
  (4) 12V, 60W GLED SLIM POWER SUPPLY (062-00036)
- **COLORS:** CABINETS & POLE COVER- CLASSIC BRONZE
- **PANELS ROTATE**
- **ANCHOR BOLTS:** SIZE 3/4" x 30"
  QTY = 4
  PATTERN = 6" x 6" OC



EACH PANEL ROTATES



SIDE VIEW

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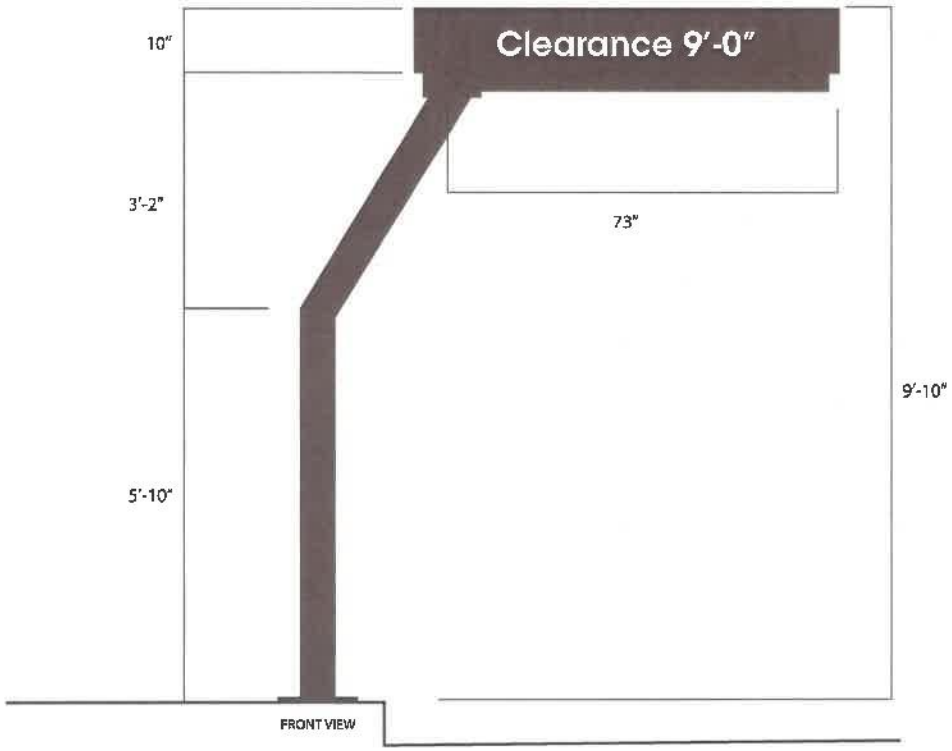

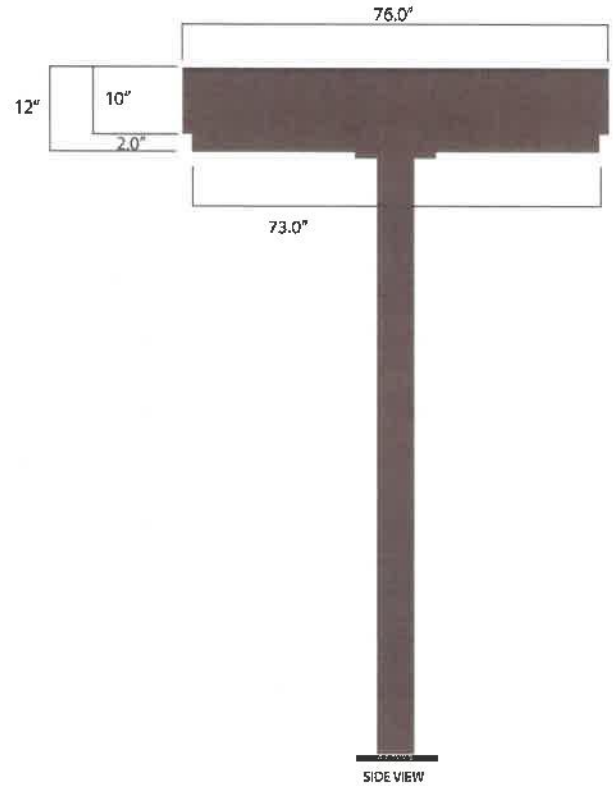

Pivoting Canopy

- **COLOR:** CLASSIC BRONZE
- **ILLUMINATION:** LED
- **MATERIAL:** POLE (STEEL)
  CANOPY (STEEL STRUCTURE W/ ALUMINUM COVERING)
- **WEIGHT:** 636 LBS
- **SQ. FT.:** ACTUAL = 11.15
  BOXED = 24.38
- **ANCHOR BOLTS:** 3/4" X 30"
  QTY= 4
  PATTERN = 9" X 9" OC

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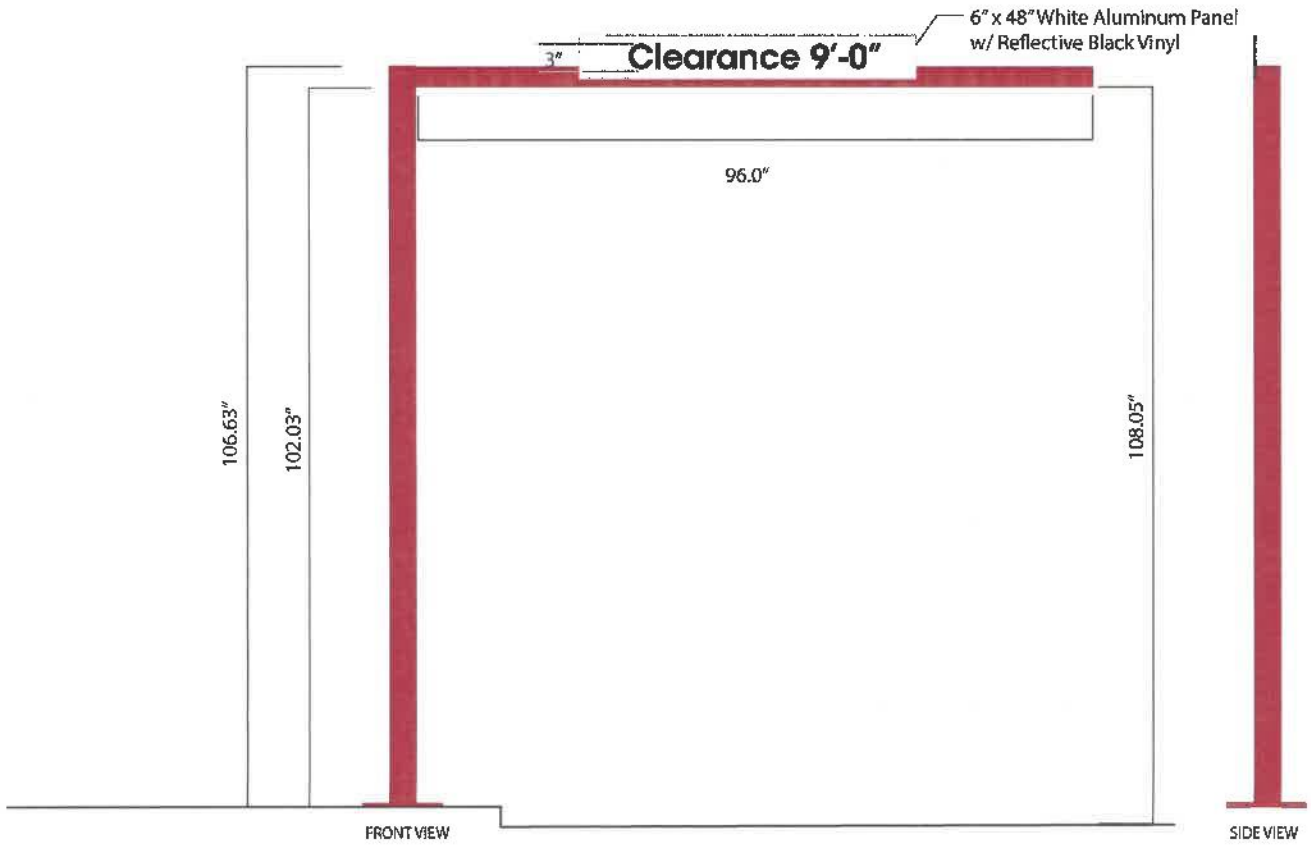

- **WEIGHT:** 183 LBS
- **NON ILLUMINATED**
- **COLOR:** RED
- **SQ. FT.:** ACTUAL = 6.51
  BOXED = 8.1
- **ANCHOR BOLTS:** 1/2" X 24"
  QTY= 4
  PATTERN = 8" X 8" OC

Single Lane Vehicle Height Detector

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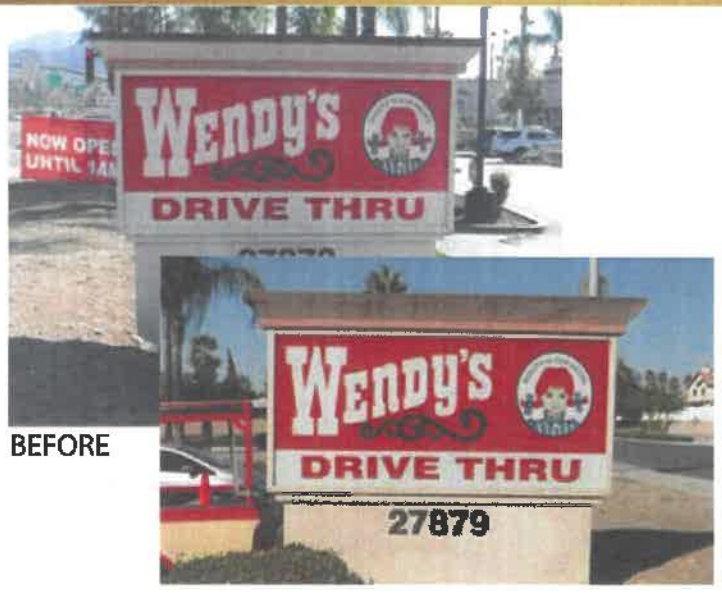
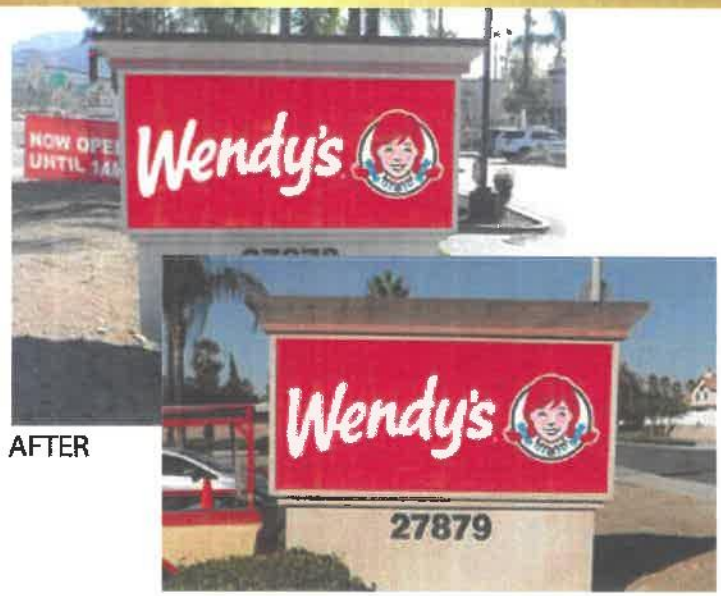


BEFORE



AFTER

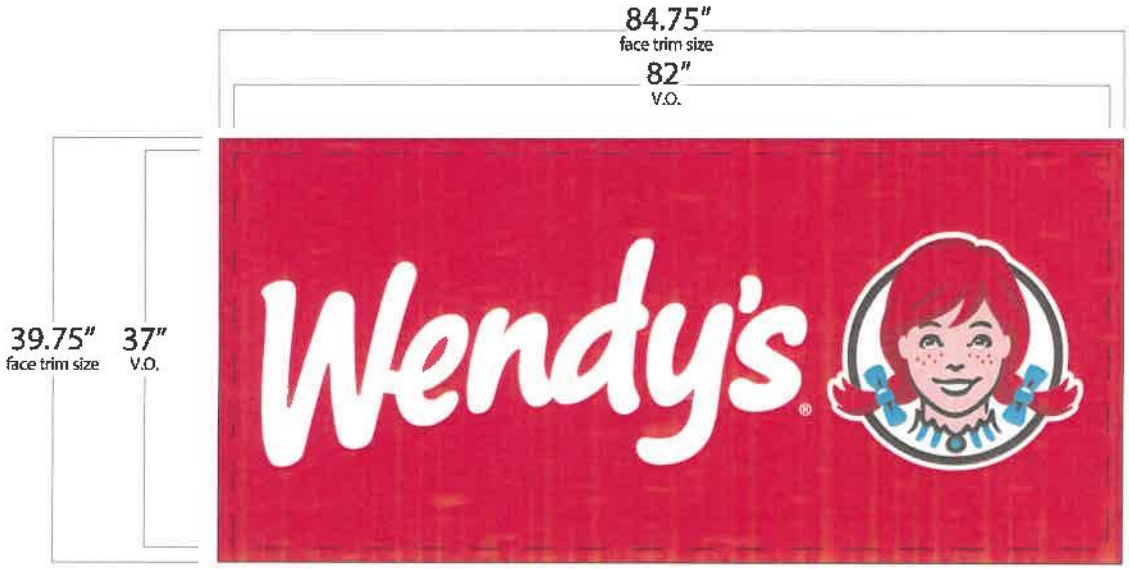
2 Monument Flat Face Replacements

Materials:
3/16" White Acrylic w/ 1st surface vinyl

Visual Opening:
H: 37" x W: 82"

COLORS & FINISHES:

PMS 186C — Hair, Freckles, Red Bckgrnd	PMS 201C — Hair, Outline
PMS 299C — Bow, Shirt Brooch	PMS 439C — Outline
PMS 698C — Face, Neck	WHITE



Rendering
...for graphic purposes only and not intended for actual construction dimensions. For windload requirements, actual dimensions and mounting detail, please refer to engineering specifications and install drawings.

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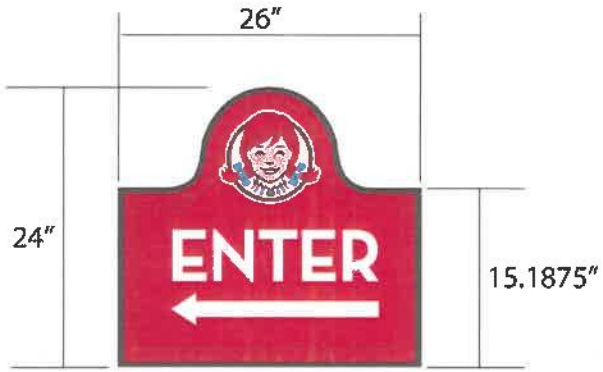

NOTE:
To be mounted on existing pole and foundation.

ENTER DIRECTIONAL
WDC 1





COLORS:

PMS 186c

PMS 698c

PMS 201c

PMS 299c

PMS 439c

ILLUMINATION: LED

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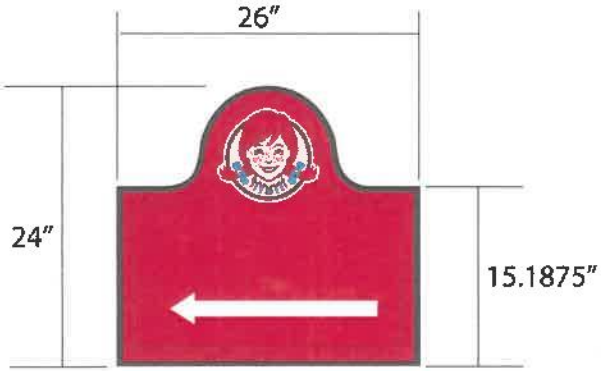

NOTE:
To be mounted on existing pole and foundation.

PICK UP DIRECTIONAL
WDC 3





COLORS:

PMS 186c
PMS 698c
PMS 201c
PMS 299c
PMS 439c

ILLUMINATION: LED

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Attachment 1:

Resolution 2021 – ____

Design Review Application (DRA 21-017)

RESOLUTION NO. 2021 – ____

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF HIGHLAND, CALIFORNIA, APPROVING A DESIGN REVIEW APPLICATION (DRA 21-017) FOR THE EXTERIOR REMODEL INCLUDING NEW SIGNAGE, PAINT, AND ACCENT FINISHES AT AN EXISTING WENDY'S RESTAURANT LOCATED AT 27879 BASE LINE. ASSESSOR'S PARCEL NUMBER: 1201-091-55.

APPLICANT: WENDY'S

A. RECITALS

1. On September 24, 2021, the Applicant filed an application with the City of Highland to request a Design Review Application (DRA 21-017) for the exterior remodel including new signage, paint, and accent finishes at an existing Wendy's restaurant located at 27879 Base Line. Assessor's Parcel Number: 1201-091-55.

2. The subject parcel is a 34,543 square foot property which features a 3,215 square foot single-story Wendy's restaurant building that was constructed in late 2001.

3. On December 21, 2021, the Planning Commission of the City of Highland conducted a public hearing on the subject application and concluded the hearing on that date.

4. All legal prerequisites to the adoption of this Resolution have occurred.

5. Pursuant to CEQA, the project is Categorically Exempt from environmental proceedings under the California Environmental Quality Act (CEQA) guidelines pursuant to Section 15301, Class 3: consisting of the operation, repair, maintenance, permitting, leasing, licensing, and/or minor alteration of an existing public or private structure.

B. RESOLUTION

NOW THEREFORE, it is hereby found, determined and resolved by the Planning Commission of the City of Highland as follows:

1. The Planning Commission finds that all of the facts set forth in the Recitals, Part "A" of this Resolution, are true and correct.

2. The City of Highland Planning Commission after due consideration, inspection, investigation and study made by itself and on its behalf, and after due consideration of all evidence and reports offered at said hearing, including the staff reports to the Planning Commission dated December 21, 2021, which is

incorporated herein by this reference, does find and determine the following facts:

a. All necessary public meetings and opportunities for public testimony and comment have been conducted in compliance with State Law and the Municipal Code of the City of Highland.

3. Findings of Fact for Design Review Application (DRA 21-017):

a. That the proposed project is consistent with the general plan or specific plan.

Response: The project is located within the Planned Commercial (PC) land use designation, and proposes to simply make aesthetic improvements and color changes to the existing eating establishment. No changes to parking, traffic, building size, design, or any other development standards are being proposed. The proposed modifications to the exterior and signage shall be permitted, subject to a Design Review Application.

b. That the proposed use is in accordance with the objectives of this title, and the purposes of the land use district in which the site is located.

Response: The modifications to the exterior of this restaurant building will not contribute to impairing the integrity and/or character of the district or its surroundings. The visible changes are simply cosmetic, in that the colors chosen are compliant with the corporate designs and are acceptable for the surrounding vicinity. Therefore, no significant impacts to the existing quality of the site or its surroundings would occur as a result of the project.

c. That the proposed use is in compliance with city design and landscape standards and criteria.

Response: The project is suitable and permitted within the Planned Commercial (PC) zone. All that is being proposed is a modification to the exterior colors/accents on the building and new signage to comply with the updated corporate signs and designs. However, the project has been conditioned to install a solid roof along with a mesh cover on the enclosure to secure it from transient intrusions, in compliance with updated City requirements.

While no planting plan or landscape related improvements have been proposed as part of this redesign, it is Staff's concern that it will be rather difficult to preserve the foundation planting around the building once construction on the facades commences. Thus, the project has been conditioned to include new plant material within the areas between the building and the surrounding drive aisle / drive-thru lane. A separate

condition has also been added to require the installment of landscaping across the bare soil frontage along Base Line.

d. That the proposed use, together with the conditions applicable thereto, will not be detrimental to the public health, safety, or welfare or will not be materially injurious to properties or improvements in the vicinity of the site.

Response: The project is located within the Planned Commercial (PC) land use designation, and proposes to simply make aesthetic improvements and color changes to the existing eating establishment. No changes to parking, traffic, building size, design, or any other development standards are being proposed. The proposed modifications to the exterior and signage shall be permitted subject to a Design Review Application.

The proposed modifications to the restaurant building are not expected to have a significant impact on the environment due to the fact that the improvements are simply cosmetic. Per CEQA Guidelines, this project is Categorically Exempt from environmental proceedings under the California Environmental Quality Act (CEQA) guidelines pursuant to Section 15301, Class 1. Existing Facilities as it consists of the operation, repair, maintenance, permitting and minor alteration of a private structure.

4. Based on the Findings of Fact set forth above, the Planning Commission approves Design Review Application (DRA 21-017) for the replacement of existing signage with new signage and exterior improvements including new paint and accent finishes at the Wendy's restaurant located at 27879 Base Line.

C. ADOPTION OF RESOLUTION.

The City Clerk shall certify to the adoption of this Resolution and shall cause the same to be published or posted in the manner prescribed by law.

Exhibit 1 attached provides the Conditions of Approval for the project.

PASSED, **APPROVED** and **ADOPTED** this 21st day of December, 2021.

ATTEST:

Randy Hamerly, Chairman
Planning Commission

Lawrence A. Mainez
Community Development Director

Exhibit 1:

Conditions of Approval

CITY OF HIGHLAND
PLANNING DIVISION CONDITIONS OF APPROVAL

Date: December 21, 2021

Applicant: Wendy's

Project No: DRA 21-017

Proposal: Design Review Application (DRA 21-017) for the exterior remodel including new signage, paint, and accent finishes at an existing Wendy's restaurant located at 27879 Base Line.

Location: 27879 Base Line, Highland, CA 92346
Assessor's Parcel Number: 1201-091-55

PLANNING CONDITIONS

These conditions of approval represent the Planning Divisions conditions of approval and are meant to be one part of overall conditions of approval that may include, Engineering, Building and Safety, Fire Department, and other agency conditions of approval.

The conditions below are continuing conditions. Failure of the applicant and/or operator to comply with any or all said conditions at any time shall result in the revocation of this permit granted to use the subject property.

1. This Design Review Application approval shall become null and void:

    a. Unless all conditions have been complied with and the occupancy or use of the land or existing structures authorized by such conditional use permit approval has occurred within thirty-six (36) months from the approval date of said Design Review Application.

    b. Where circumstances beyond the control of the applicant cause delays which do not permit compliance within the time limitation established in this section, the City of Highland may grant an extension of time for a period of time not to exceed an additional thirty-six (36) months. An application for an extension of time must be set forth in writing, stating the reasons for the extension, and must be filed with the Planning Division a minimum of thirty (30) calendar days prior to the expiration of the Design Review Application approval. Such application shall be filed together with the city's processing fee, as established by the City Council.

2. This Design Review Application (DRA 21-017) for the exterior remodel including new signage, paint, and accent finishes at an existing Wendy's restaurant located

at 27879 Base Line. Sign exhibits and Building Elevations are attached herein by reference.

a. The design and installation of the building signs shall be in accordance with Chapter 16.56, Sign Regulations, of the Highland Municipal Code, as approved by the Planning Commission.

b. The subject property shall be developed in accordance with plans and materials approved by the Planning Commission on December 21, 2021, also attached herein, and shall be in compliance with all conditions of approval contained herein.

3. The Applicant shall agree to defend, at his sole expense, any action brought against the city, its agents, officers, or employees, because of the issuance of such approval, or in the alternative, to relinquish such approval. The applicant shall reimburse the city, its agents, officers, or employers, for any court costs and attorney's fees which the city, its agents, officers or employees may be required by a court to pay as a result of such action. The city may, at its sole discretion, participate at its own expense in the defense of any such action, but such participation shall not relieve the applicant of his obligations under this condition.

4. The site and building shall not bear any other on-premise advertising signs other than the legally approved signage. This condition excludes those that may be required by local, state, or federal laws.

5. The Applicant shall obtain any necessary permits from the Building and Safety Division prior to commencement of work on the illuminated business signs.

6. The Owner/Applicant is responsible for implementing all conditions of approval to the satisfaction of the Community Development Director, City Engineer, Fire Department, and Police Department. No final inspection or clearances shall be given until all conditions are met. Each condition of approval is separately enforced, and if one of the conditions of approval is found to be invalid by a court of law, all the other conditions shall remain valid and enforceable.

7. Where missing or disturbed, new plants / groundcover shall be installed within the areas between the building and the surrounding drive aisle / drive-thru lane in accordance with approved landscape plans on file with the City.

8. Where missing or disturbed, landscaping shall be installed within the landscape planter in the City's right-of-way between the parking lot and sidewalk.

9. A solid roof and mesh covering shall be installed atop the existing trash enclosure on the site, per city standards.

10. Revisions, modification, or deletions of associated plans must be submitted to the Planning Division for review and approval. Revisions may require additional review by the Planning Commission.

BUILDING AND SAFETY CONDITIONS

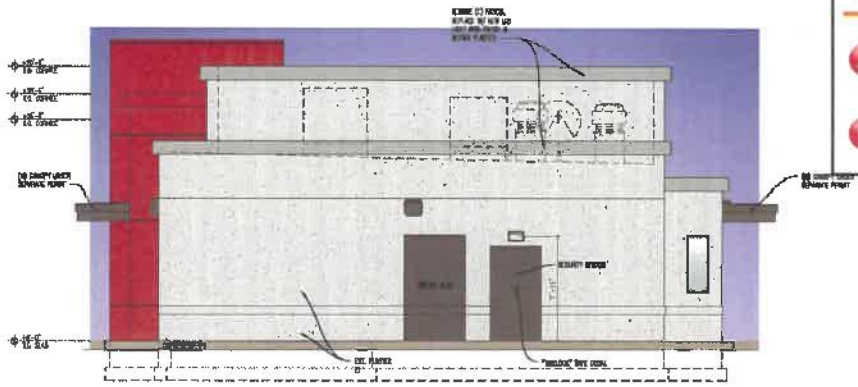
11. Submit construction plans/elevations for review and approval prior to permit issuance.

FIRE CONDITIONS

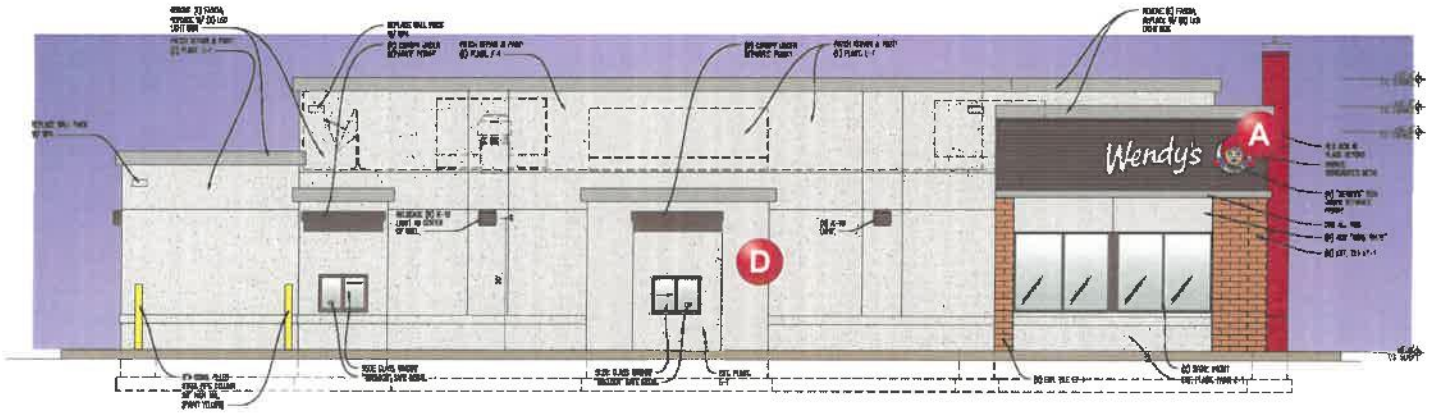
12. Building address shall be replaced with illuminated numbers for ADA compliance.

Sign Schedule

- **A** Channel Letters & Cameo - 36" White - Flush Mount
- **D** Wall Sign - 3'6"x7" - Thank You



1 SOUTHTH ELEVATION



2 EAST ELEVATION

ARNET DAVIS NEWLOVE & ASSOCIATES, AIA ARCHITECTS

E2000 REFRESH

Wendy's

#08280
27879 BASELINE AVE.
HIGHLAND, CA, 92346

EXTERIOR ELEVATIONS

A2.2

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Sign Schedule

- **B** Channel Letters & Cameo - 42" White - Flush Mount
- **C** E2000 Blade Wall Downlight Kit 36"



1 NORTH ELEVATION



2 WEST ELEVATION

ARNET DAVIS MEWLOVE & ASSOCIATES, AIA ARCHITECTS

PROJECT TYPE: E2000 REFRESH

Wendy's

#08280
27879 BASELINE AVE.
HIGHLAND, CA, 92346

EXTERIOR ELEVATIONS

A2.1

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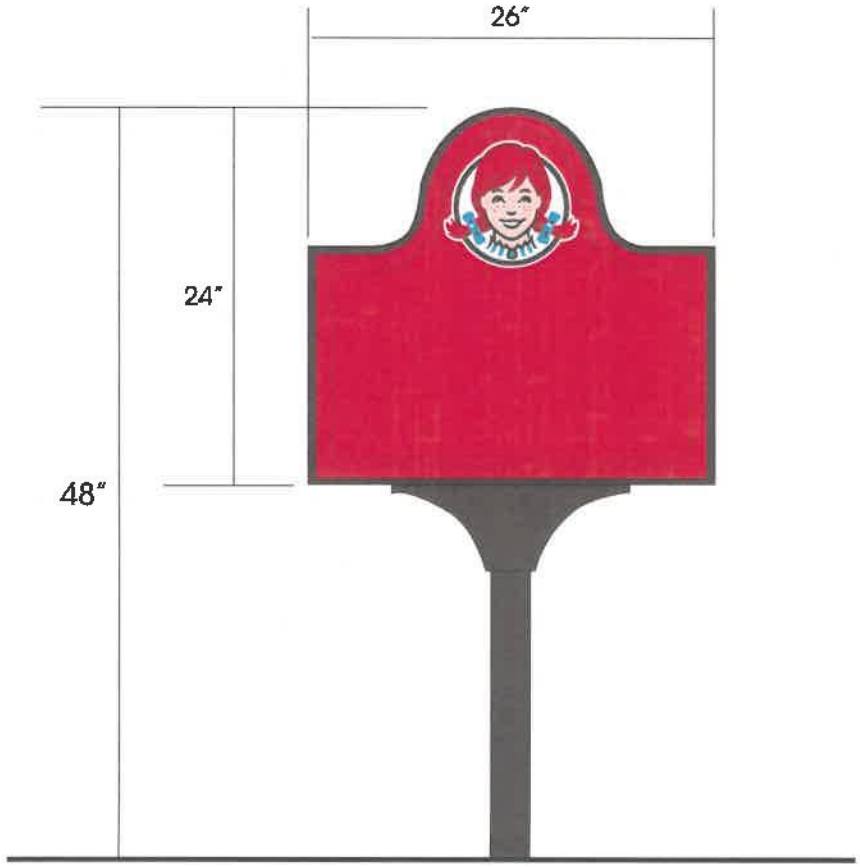

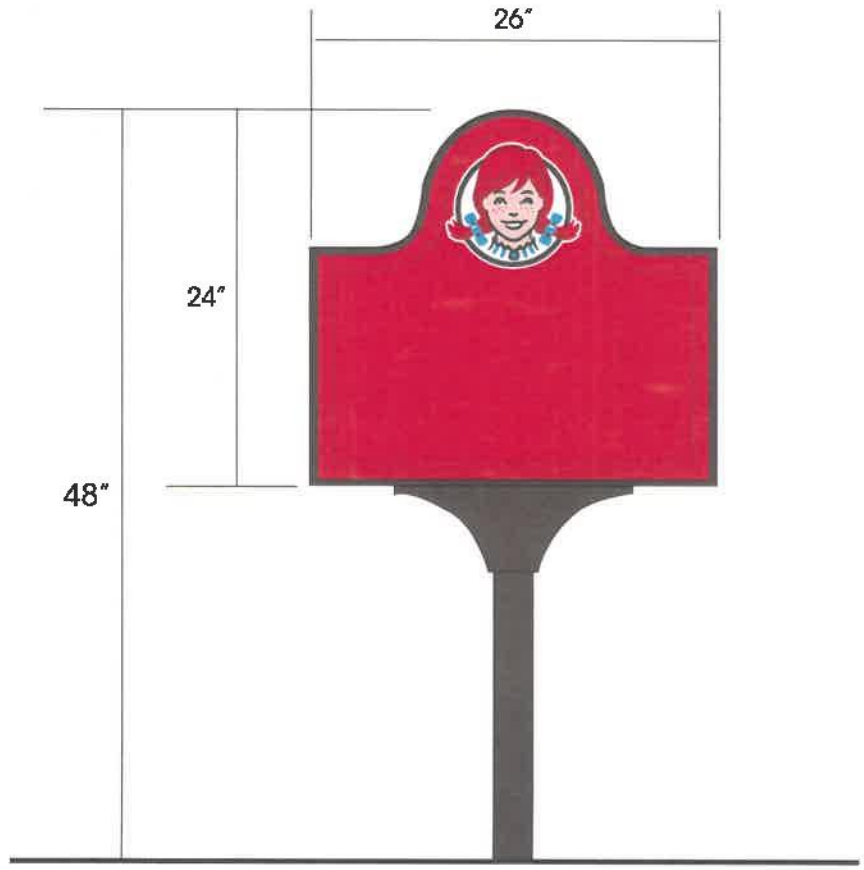

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