PALM/INDUSTRIAL DISTRIBUTION CENTER

Addendum to the Palm/Industrial Distribution Center Final Environmental Impact Report

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CHAPTER 1 **Introduction**

This document is an Addendum to the Final Environmental Impact Report for the Palm/Industrial Distribution Center (hereafter the "approved project"), which was certified on September 28, 2011, by the City of San Bernardino Planning Commission by Resolution No. 11-02. The Planning Commission concurrently adopted Facts, Findings, and Statement of Overriding Considerations and the Mitigation Monitoring and Reporting Program, and approved Development Permit Type 2 No. 06-28. The Final Environmental Impact Report (hereafter, "EIR") is comprised of the Draft EIR (Volume I), technical appendices (Volumes II and III), and the Final EIR containing text changes and responses to comments (Volume IV).This document is an Addendum to the EIR, responsive to CEQA Guidelines Section 15164, which states:

> (a) The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have [sic] occurred.

CEQA Guidelines Section 15162 sets forth specific requirements for preparation of a supplemental or subsequent EIR, which include:

> (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR … due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
>
> (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR … due to the involvement of new significant effects or a substantial increase in the severity of previously identified significant effects; or
>
> (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete … , shows any of the following:
>
> (A) The project will have one or more significant effects not discussed in the previous EIR … ;
>
> (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
>
> (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
>
> (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

This document is the Addendum to the EIR for the Palm/Industrial Distribution Center project, which was certified on September 28, 2011, by the City of San Bernardino Planning Commission. The subject of this Addendum includes proposed clarifications and corrections of biological resource identification and modifications to biological resource mitigation measures. Also analyzed in this Addendum is the export of 100,000 cubic yards of soil during grading to the adjacent SANBAG grade separation site, with the remaining 100,000 cubic yards of soil exported to off-site locations as was analyzed in the EIR.

For the approved project, minimal changes in the site and grading plans and minor revisions to biological resources mapping and mitigation measures are proposed, which do not represent substantial changes to the project, a change in the circumstances under which the project would be carried out, or present any new information that was not known at the time the EIR was prepared that will involve any new significant impacts, or substantially increase the severity of any of the significant impacts previously identified in the EIR as defined by Section 15162. Therefore, an Addendum is the appropriate document to analyze the changes to the approved project.

The EIR for the project determined that, even with the mitigation measures identified in the EIR, the following impact areas would remain significant and unavoidable:

1. **Air Quality Standards Violations during Operation:** Operation of the proposed project would violate an air quality standard or contribute substantially to an existing or projected air quality violation. The proposed project would generate long-term air quality impacts associated with its operation. The primary source of operational emissions would be motor vehicle emissions (mobile source emissions) generated from project-induced vehicle trips and truck trips associated with operation of the industrial warehouse. Other emissions, identified as "area source emissions," would be generated from natural gas consumption for water and space heating, landscape and building maintenance activities, and use of consumer products. The proposed project's operational emissions would exceed the SCAQMD significance thresholds for NO_X emissions from vehicle trips. Even with implementation of all feasible mitigation measures, NO_X emissions would still exceed the SCAQMD significance threshold. This impact would be significant and unavoidable.
2. **Exceedance of Localized Significance Thresholds:** Construction and operational activities associated with development of the proposed project would generate emissions that would result in an exceedance of localized significance thresholds for PM_{10} and $PM_{2.5}$ established by the SCAQMD, and, therefore, would expose sensitive receptors to substantial pollutant concentrations. This is considered a significant impact. Compliance with project requirements and implementation of mitigation measures MM4.2-8, MM4.2-2(a), MM4.2-2(b), and MM4.2-5(a) through MM4.2-5(d) would reduce this impact, but not to a less-than-significant level.

All other short-term and long-term impacts of the project identified in the EIR would be mitigated to less-than-significant levels.

The analysis in this Addendum concludes that the minor modifications in biological resource identification and mitigation measures and the proposed changes to soil export locations would not result in any new effects in the following impact areas: Aesthetics, Air Quality; Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Public Services, Transportation, Utilities and Service Systems, and Energy and Greenhouse Gas Emissions. The proposed project as revised in this Addendum would incorporate all mitigation measures identified in the EIR as well as the revised mitigation measures set forth herein.

No substantial changes have been proposed to the project described in the EIR that would require major revisions to the EIR. The proposed modifications would not alter the development permitted on the site. None of the conditions or circumstances that would require preparation of a subsequent or supplemental EIR pursuant to Public Resources Code Section 21166 exists in connection with the modifications proposed by the project under consideration in this Addendum.

1.1 INTENDED USES OF THIS DOCUMENT

This Addendum may be used for all the purposes cited in the EIR, including:

- To inform the general public, the local community, responsible and interested public agencies, the decision-making bodies (e.g., Planning Commission and Common Council) and other organizations, entities, and interested persons of the scope of the proposed project, its potential environmental effects, possible measures to reduce potentially significant environmental impacts, and alternatives that could reduce or avoid the significant effects of the proposed project
- To enable the City to consider environmental consequences when deciding whether to approve the proposed project
- To satisfy the substantive and procedural requirements of CEQA

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CHAPTER 2 **Project Overview**

2.1 PROJECT SITE

The project site is contained within the United States Geological Survey (USGS) 7.5-minute series topographical map for San Bernardino North. The project site is located in the City of San Bernardino (City), San Bernardino County (County), California (State); Assessor's Parcel Number (APN) 266-041-62. The 37.4-acre site is located adjacent (south) to Interstate 215 (I-215), and approximately 3 miles east of Interstate 15 (I-15). Specifically, the project site is situated on the northeast corner of the intersection of Palm Avenue and Industrial Parkway.

The project site is currently vacant. There are two hill features within the site boundaries that occupy approximately 35 percent of the property. The flat terrain of the project site is located between 1,640 and 1,680 feet (ft) above sea level (ASL), with the larger of the two hill features reaching 1,805 ft ASL. The majority of the flat terrain has been disked, though the undisked portions and hill features support the California sagebrush-California buckwheat series vegetation community.

Historically, the project site was reported to have been vacant until the construction of Camp Ono, a United States Army installation that operated during World War II. Camp Ono served multiple purposes, including as a depot, manufacturing facility, munitions storage, and prisoner-of-war camp. The project site itself was reportedly used for tent manufacturing. The camp was closed in June 1947. Since that time, no reported development has occurred on the project site.

The project site is within the Industrial Light (IL) land use category, as established in the City's General Plan. The project site and a large contiguous area to the south, east, and west are currently zoned Industrial. The project site is adjacent to, and immediately north of, the Northwest Redevelopment Area.

Some commercial uses exist along the I-215 frontage and on Palm Avenue; commercial and single-family residential occurs north of Kendall Drive, on the north side of Highway 215. A summary of adjacent land uses is as follows:

- **North:** I-215 is northeast of the project site. Beyond I-215 are various commercial industries and a large residential community. The on-ramp to the southbound I-215 runs directly north of the project site. A Denny's Restaurant and gas station are northwest of the project site, adjacent to Palm Avenue. The land north of Palm Avenue is vacant. The lot at the southeast corner of Palm Avenue and Industrial Parkway (northwest of the project site) is vacant.
- **South:** Directly south of Industrial Parkway is both vacant property and active development, similar to the proposed project. Historic Route 66 and railroad tracks lie beyond this development.
- **East:** I-215 runs along the northeast boundary of the project site. Directly east of I-215, approximately 500 feet from the project site, is the residential community of Verdemont. The hills that currently occupy the project site are visible from the residential community.
- **West:** Directly west of the project site, across Industrial Parkway, is an industrial development.

2.2 PROJECT CHARACTERISTICS

The proposed project remains as described in the EIR and includes the construction of a warehouse/distribution facility consisting of a single building totaling 678,275 square feet (sf) on 34.7 acres. Lot coverage would be 43 percent and the building height of the proposed project would not exceed 40 feet (ft) above finished pad. The existing hill features located on site would be leveled and approximately 200,000 cubic yards of soil exported. All other excavated soil would remain on site as fill. The front of the proposed project would be sited along Industrial Parkway. The proposed project would include a small office area and a cross-dock loading configuration. The office area would be located at the northwest corner of the warehouse/distribution facility, with trailer docking stations located along the northern and southern facing portions of the structure. Approximately 12 percent of the project site would be landscaped. The proposed project would include an 8-foot wrought-iron fence around the perimeter and a guard shack for entry and exit.

Access to the project site would be from the driveway located at the northern end of the project site on Industrial Parkway. All truck traffic into the project site would be cleared through a guard shack situated at the access driveway. The vast majority of traffic will access Industrial Parkway via Palm Avenue, off I-215.

2.3 MODIFICATIONS TO THE PROPOSED PROJECT

Since certification of the EIR, minor modifications have been made to the project, described as follows:

2.3.1 Soils Export

As described in the EIR, 200,000 cubic yards of soil would be exported from the site during grading activities. However, 100,000 cubic yards of this soil would now be exported to the adjacent SANBAG grade separation project, which is within 0.25 mile of the project site. The remaining 100,000 cubic yards of soil would be exported to various locations as described in the EIR. Because substantially shorter truck trips would be required to export half of the soil to an adjacent site rather than the 20 miles (round-trip truck trips) analyzed in the EIR, pollutant emissions from truck operations would be less. Therefore, this Addendum models the air quality emissions that would be expected under this revised grading scenario and compares it to the export conditions described in the EIR. Because fewer pollutant emissions would result in the revised grading scenario, the mitigation measure in the Final EIR restricting maximum daily soil export has been revised; however, overall emissions would remain below SCAQMD thresholds of significance despite the adjusted grading parameters.

2.3.2 Biological Resources Identification and Mitigation Measures

The Addendum addresses inconsistencies or inaccuracies of the biological resources section of the EIR (described below) that are based on new or updated information pertaining to special-status species, habitats, or potentially jurisdictional features. Slight changes to the acreages and classification of the

habitats within the Study Area have been made, summarized as follows and described in detail in Appendix B as well as in Chapter 3 of this Addendum:

- Reclassification of unvegetated dirt roads that were misclassified as part of the coastal sage scrub community
- Addition of a small developed area to include the vacant dirt and gravel lot in the northwest portion of the project site
- Reclassification of the 0.51-acre ephemeral wash identified in the 2007 biological report to erosional or topographic feature; vegetation map updated this area as part of coastal sage scrub
- Change to note project site does not occur within any USFWS-designated critical habitat
- Addition of six special-status plant species that have a moderate or greater potential to occur within the Study Area, and that were not previously identified in the EIR:
  - thread-leaved brodiaea (*Brodiaea filifolia*)
  - Parry's spineflower (*Chorizanthe parryi* var. *parryi*)
  - slender-horned spineflower (*Dodecahema leptoceras*)
  - Santa Ana River woollystar (*Eriastrum densifolium* ssp. *sanctorum*)
  - Robinson's pepper-grass (*Lepidium virginicum* var. *robinsonii*)
  - Parish's desert-thorn (*Lycium parishii*)
- Clarification of potential federal and State jurisdictional waters
- Revised mitigation measures to correspond to these corrections

The Mitigation Monitoring and Reporting Program (MMRP) that was adopted at the time of certification of the Final EIR has also been amended to reflect the changes in the mitigation measures as outlined in this Addendum.

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CHAPTER 3 Environmental Impact Analysis

The following analysis summarizes the significance conclusions of the EIR for the project. The first subsection discusses impacts that were not found to be significant, as identified in Section 4.14 (Effects Not Found to Be Significant) of the EIR. The next subsections discuss impacts that were found to be less than significant, less than significant with mitigation, or significant and unavoidable. For each issue area, the analysis contained in the Final EIR is described, followed by an analysis of project modifications and a conclusion as to whether the project modifications change the significance conclusion in the Final EIR.

3.1 EFFECTS NOT FOUND TO BE SIGNIFICANT

The notice of preparation (NOP) for the proposed project identified various impact categories among a number of environmental issues that would not be significantly impacted by the proposed project and, therefore, do not require further review in this Draft EIR. Each of these environmental issues was evaluated in the NOP and determined not to represent a significant impact of the project. The impacts found not to be significant are listed below.

Aesthetics

Due to the presence of two large hills on site and the presence of the I-215 located on a slightly elevated berm adjacent to the site, views of the San Bernardino Mountains are blocked from most vantage points on the site. These on-site hills also block any view through the site. Views of the San Bernardino Mountains are available from surrounding land uses and streets. Additionally, the proposed project height of the building, approximately 40 feet, plus the additional 12-foot-high berm, as well as the bulk and scale of the project, would not block a scenic vista. No views of an urban skyline, valley, or large body of water are available from surrounding land uses. Proposed setbacks from the public right-of-way and adjacent property lines, as well as the removal of some existing aboveground utilities and their placement underground will enhance the aesthetics of the area. As there are no currently held scenic vistas from and/or through the project site, implementation of the proposed project would have no impact on a scenic vista.

The project site is not located within the viewshed or corridor of a state-designated scenic highway. Additionally, the project site is also not located within a county-designated scenic corridor. Because the project site is neither located proximate to a state-designated highway, nor within a designated view corridor associated with a scenic highway, development of the proposed project would have no impact on scenic resources within a state scenic highway view corridor.

Analysis of Project Modifications

The project remains as described in the EIR, including heights, architectural features, setbacks, and other characteristics that could affect visual quality. There would continue to be no impact.

Agricultural and Forest Resources

There is no Prime Farmland, Farmland of Statewide Importance, or Unique Farmland located on the project site, nor is the project site listed as a candidate for Prime Farmland. The project site is not under a Williamson Act contract, as the project site is currently undeveloped and zoned for industrial uses. There is no forestland or timberland on the project site. No environmental changes associated with the proposed project would result in the conversion of farmland to non-agricultural uses. No impact would occur.

Analysis of Project Modifications

Site conditions remain as described in the EIR. There would continue to be no impact.

Biological Resources

The project site has not been incorporated in to a HCP or NCCP. As mentioned in the "Regulatory Framework" section, "Regional" subsection, of Section 4.3 (Biological Resources) of the EIR, the *San Bernardino Valley Wide Multi-Species Habitat Conservation Plan* is still under preparation; the schedule for completion and adoption of the MSHCP is uncertain at this time. As such, the proposed project would not conflict with an adopted HCP, NCCP, or other approved local, regional, or state HCP. No impact would occur.

Analysis of Project Modifications

The project site is still not subject to an HCP or NCCP. Therefore, no impact would continue to occur.

Cultural Resources

As described in Section 4.4.1 (Cultural Resources, Environmental Setting) of the EIR, the only historical resources identified within the project site are old remnants of structures such as concrete foundations and broken fences. Implementation of the proposed project would include the removal of these structures during site preparation (clearing, excavation, trenching, etc.); however, as described above, these remnants are not considered likely to yield information important to history or prehistory, and are not considered eligible or potentially eligible for listing in the NRHP. Therefore, they do not meet the definition of an historical resource under CEQA Guidelines Section 15064.5(a), and their removal would not constitute a significant effect on the environment. Because the identified remnants within the project site are not considered historical resources, their removal as a result of implementation of the proposed project would result in no impact.

Analysis of Project Modifications

There are no historic structures on the project site. Therefore, no impact to historic resources would continue to occur.

Geology/Soils and Mineral Resources

The Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist (CGS 1999) indicates that the San Andreas and San Jacinto faults are in proximity to the project site, but do not extend into any portion of the project site. The San Jacinto fault is located approximately 0.5 mile to the west. The San Andreas Fault zone is located approximately 1.5 miles northeast from the site and the Cucamonga fault zone approximately 4.5 miles to the northwest. Because the project site would not be in an Alquist-Priolo Earthquake Fault Zone, the potential for damage caused by surface fault rupture is not considered an impact. There are no known active or potentially active faults trending toward or through the proposed development area. Consequently, implementation of the proposed project would have no impact associated with the exposure of people or structures to a rupture of a known earthquake fault.

There are no unique geologic or physical features located within the project site. The topography of the site is dominated by two, relatively small, roughly northwest-to-southeast trending hills, separated by a low-lying linear topographic feature. The larger hill comprises nearly half of the site in the east-southeast portion and the smaller of the on-site hills is in the northwestern portion of the site. Evidence from historic aerial photographs revealed that one of the hills was cut down from its original height sometime in the past. The hill was similar in size to the larger hill prior to 1962 and it currently lies approximately 30 feet higher than the adjacent low-lying areas. The hills will be leveled to accommodate the new development but no impact will be incurred regarding the removal of the hillside. The site's geologic features have already been modified and additional grading and leveling of the hillside would be of no impact.

The project site contains no channels, creeks, or rivers. There are two small gullies are present within the site, but these are incidental drainages. One of the two gullies is located north of the small on-site hill existing from a storm drain trending southeast where stormwater is redirected by the large onsite hill southward, while the other travels along the north side of the large onsite hill, trending southeast. These gullies do not contribute to a unique and distinct community, nor do they represent a significant topographic feature. There would be no impact.

The project site would experience earthquake-induced groundshaking activity because of its proximity to known active faults. During severe groundshaking, loose granular soils below the groundwater table may liquefy. Based on the Geotechnical Investigation, the lower lying areas of the site are underlain at depth by relatively dense alluvial materials and the depth to current groundwater levels is thought to be in excess of 50 feet, therefore, the possibility of liquefaction at the site is considered nil. Liquefaction is also considered nil within the elevated portions for the site underlain by metamorphic bedrock. Therefore, the proposed project would have no impact associated with the exposure of people or structures to seismically induced ground failure, including liquefaction.

Analysis of Project Modifications

The changes in the proposed project would not affect the analysis of impacts to geology, soils, and minerals, even if the project site were listed on an Alquist-Priolo Earthquake Fault Zone. There are no unique topographic features on the project site, which remains in the same condition as analyzed previously. No channels, creeks, or riverbeds occur on the project site. The geology of the project site

remains as discussed in the EIR and there is no increased risk from liquefaction or seismically inducted ground failure. There are no known mineral resources on the site. There would continue to be no impact.

Hazards and Hazardous Materials

The project site is not located within 0.25 mile of an existing or proposed school. The area containing and surrounding the project site is zoned for industrial use. Therefore, there would be no impact from hazardous emissions or handling, use, disposal, or transport of hazardous materials within 0.25 mile of a school.

The nearest public or private airport/airstrip to the project site is the Rialto Municipal Airport, located approximately 4 miles from the project site. There would be no hazard to construction workers or employees of the project as a result of proximity to an airport.

The project site is currently vacant, and has two defining hill features within its boundaries. Although the hill features and undisked portions of the site support various vegetation communities, the majority of the flat terrain has been disked, and the proposed project would involve leveling the hill features and removal of all existing vegetation. Further, the project site is not located within Foothill Fire Zones A & B or C as identified on the Land Use Plan/Zoning Districts Map of the General Plan. Fire protection services would be provided by the San Bernardino Fire Department (SBFD). The proposed development would be required to comply with applicable fire-related building codes; therefore, implementation of the proposed project would result in no impact associated with the exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires.

Analysis of Project Modifications

None of the existing conditions as identified in the EIR has changed. The project would still be required to comply with all applicable codes. There would continue to be no impact.

Hydrology/Water Quality

The project site is not located in a 100-year flood hazard area according to FEMA Flood Insurance Rate Map No. 06071C7940 F and 06071C7930 F (effective dates March 18, 1996). Therefore, there would be no housing placed within a 100-year flood hazard area and no impact would occur.

The project site is not located in a 100-year flood hazard area as mapped by FEMA. Therefore, implementation of the proposed project would not place structures in a 100-year flood hazard area such that flood flows would be impeded or redirected and no impact would occur.

Tsunamis are large sea waves generated by submarine earthquakes, or similar large-scale, short-duration phenomena, such as volcanic eruptions, that can cause considerable damage to low-lying coastal areas. Because the project site is locate almost 50 miles inland of the Pacific Ocean, the project site would not be subject to tsunami inundation.

Seiches are waves, also caused by large-scale, short-duration phenomena that result from the oscillation of confined bodies of water (such as reservoirs and lakes) that also may damage low-lying adjacent areas, although not as severely as a tsunami. The closest enclosed bodies of water that could result in

earthquake-induced seiches are Silverwood Lake (more than 5 miles away) and Lake Arrowhead (more than 10 miles away). Therefore, any potential seiche activity in these lakes would not be expected to reach the project site and would be no risk to the project site from seiches.

Mudflow hazards typically occur where unstable hill slopes are located above gradient or where site soils are unstable and subject to liquefaction, and when substantial rainfall saturates soils causing failure. The hills located on the project site would be removed and the project site graded flat. The project site is not located near steep unstable hill slopes susceptible to mudslides or within a debris flow hazard area. In fact, the closest hillsides up-gradient from the project site are more than 2 miles to the northeast, and are separated from the project site by urban development, including Interstate 215, residential uses, streets, and storm drain systems, which makes it unlikely that the project site would experience any affects caused by mudslides, if they occurred. Hillsides below-gradient from the project site would not contribute mudslides to the project site (mudslides would have to completely fill in the lower elevation areas before reaching the project site). Therefore, the project site is not expected to be subject to a mudflow risk.

In summary, there would be no impact that would expose people or structures at the project site to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflows.

The project site is not located in the vicinity of any large bodies of water which could utilize a levee or dam, as there are no levees or dams within the project area; they do not impose a threat to the project site and would not result in flood associated with the failure of levee or dam.

Analysis of Project Modifications

The site conditions remain as described in the EIR. Changes in biological resource identification and soil export locations would not affect or increase flood hazards. The same amount of soil would be excavated from the project site. There would continue to be no impact.

Land Use/Planning

The proposed project would not create a physical barrier to or division of an established community. Surrounding the project site, uses consist primarily of industrial use with residential communities east of the I-215 freeway. The northeast boundary of the project site is the I-215 freeway, directly east of the highway is a residential community. As the community is contained to the east of the highway, the proposed project does not impose a threat to divide the already established community, as the highway prevents the residential community from expanding further west in to the project site boundaries. Additionally, there are several vacant lots in the vicinity of the project site and some development that resemble the current uses of this development.

According to the 2005 City of San Bernardino General Plan, the project site is located within the Light Industrial Zoning District. This District is intended to retain, enhance, and intensify existing uses and provide for the new development of lighter industrial uses along major vehicular, rail, and air transportation routes serving the City. Warehousing and wholesaling are permitted uses within this District. The proposed project is not located within the City's Hillside Management Overlay District; alterations to the topography of the site would not conflict with the designation or zoning of the project

site. Additionally, the proposed project is not located within the Airport Influence Area of the San Bernardino International Airport Authority. The proposed project is an industrial distribution facility, and it would not conflict with the General Plan land use designation as identified on the General Plan Land Use Plan/Zoning Districts Map.

The project site is not located within Foothill Fire Zones A & B, or C as identified on the Land Use Plan/Zoning Districts Map of the General Plan. As such, the proposed project would have no impact on development within these Foothill Fire Zones.

No habitat conservation plan or natural community conservation plan is applicable to the project site. No impact would occur.

Analysis of Project Modifications

The project would be implemented as identified in the EIR. There are no changes to the site plan, grading plan, or structural characteristics with the exception that 100,000 cubic yards would be transported to an adjacent site rather than transported to a more distant location. This change would not affect land use. Clarification and re-identification of biological resources would similarly not affect land use. There would continue to be no impact.

Noise

The project site is not located within an airport land use plan or within 2 miles of a public airport or public use airport. The nearest public or private airport/airstrip to the project site is the Rialto Municipal Airport, located approximately 4 miles from the project site. The project site is not located within the vicinity of a private airstrip. The nearest public or private airport/airstrip to the project site is the Rialto Municipal Airport, located approximately 4 miles from the project site. Therefore, no impact related to the exposure of people working in the project site to excessive noise levels is anticipated to occur from a public or private airstrip.

Analysis of Project Modifications

The site conditions are the same as identified in the EIR. There is no new private or public airport or airstrip located in the project vicinity. There would continue to be no impact.

Population and Housing

The proposed project consists of a distribution facility of approximately 678,275 square feet, and would employ approximately several hundred workers. Currently, there is a high unemployment rate in the Inland Empire, and a large jobs-housing imbalance. The Inland Empire, of which San Bernardino is a part, needs significantly more jobs to help address the high unemployment rate, as well as the high imbalance between jobs and existing housing. As a result of the high unemployment rate, and the jobs/housing imbalance, the project will add needed jobs to the area, but is not large enough to induce substantial population growth in the area, either directly or indirectly. Labor jobs of the type that would be provided by the project are generally filled by a local employment pool, as the wage scale is not sufficient to justify long commute times. It is anticipated that the jobs provided by the proposed project

would be filled by current residents of the City of San Bernardino and/or by residents of the immediately adjacent communities, and there would be no substantial population increase (new residents of the City) as a result of the project. Infrastructure to accommodate the project, such as extension of sewer or water lines, would not be constructed in an area not currently developed and would not act as an impetus for additional population or housing growth (leapfrog development). The proposed project, therefore, would not induce either direct or indirect substantial growth in the area.

The project site is currently vacant, and does not have existing residential uses, which would result in the displacement of existing housing. No impact would occur.

As discussed above, the proposed project's industrial use and anticipated employment generation would not result in a substantial increase in population growth. No residential development is planned as part of the proposed project, and jobs provided by the proposed project would be expected to be filled by current residents of the City or adjacent communities. Therefore, the proposed project would not create a significant demand for additional housing based on the proposed use and evaluation of the project's size. No impact would occur.

Analysis of Project Modifications

The project description is the same as that analyzed in the EIR. No housing is proposed and no housing would be displaced. There would continue to be no impact.

Public Services (Schools)

Because there would be no residential component of the proposed project and no substantial population increase as a result of the proposed project, there would be no increased adverse demand on schools or recreational facilities.

Analysis of Project Modifications

There would continue to be no residential component that could adversely affect schools. There would continue to be no impact.

Recreation

Because there would be no residential component of the proposed project and no substantial indirect population increase as a result of the proposed project, there would be no substantial increase in demand for neighborhood or regional parks or other recreational facilities. Employees of the project would not be anticipated to substantially increase the demand for parks and recreational facilities elsewhere in the City, as they are anticipated to be primarily current residents who already may utilize such facilities. No substantial population growth would occur as a result of the project.

There are no neighborhood parks, regional parks, or other recreational facilities in proximity to the project site. As discussed above, employees of the project would not be anticipated to substantially increase the demand for parks and recreational facilities elsewhere in the City, as they are anticipated to be primarily current residents who already may utilize such facilities, and no substantial population

growth would occur as a result of the project. There are no recreational facilities included in the proposed project, the construction of which that could cause adverse environmental effects.

Analysis of Project Modifications

There would continue to be no residential component of the project that could adversely affect recreation, nor is there a recreational component of the project. There would continue to be no impact.

Transportation/Traffic

The proposed project is not located within an airport land use plan; the closest airport to the project site is Rialto Municipal Airport, located 4 miles away. The proposed project will not cause an increase in air traffic levels, as the primary mode of transit to move goods into and out of the project site will be through trucking operations; there will be no air service to the project site.

Analysis of Project Modifications

The project site is not located within an airport land use plan. There would continue to be no impact.

3.2 LESS-THAN-SIGNIFICANT IMPACTS

Aesthetics

Operation of the proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings.

Analysis of Project Modifications

The minor modifications in the proposed project would not affect the visual quality as analyzed in the Final EIR. Construction activities would remain the same as described in the EIR.

Air Quality

Development of the proposed project would not conflict with or obstruct implementation of the applicable air quality plan. Development of the proposed project would not expose sensitive receptors to substantial pollutant concentrations due to project-generated toxic air emissions. Operation of the proposed project would generate increased local traffic volumes, but would not expose sensitive receptors to substantial localized CO concentrations. Development of the proposed project would not create objectionable odors affecting a substantial number of people. Compliance with the identified project requirement PR4.2A would ensure that this impact would remain less than significant. Construction of the proposed project would not violate an air quality standard or contribute substantially to an existing or projected air quality violation. Compliance with the identified project requirements PR4.2B through PR4.2D would ensure this impact would remain less than significant.

Analysis of Project Modifications

The project modifications would not change the analysis contained in the Final EIR with respect to the AQMP, exposure of sensitive receptors to substantial pollutant concentrations or localized CO concentrations during operation, violation of air quality standards, or create objectionable odors. The changes in the grading plan that would affect air quality during construction are discussed in Section 5.3 (Less-Than-Significant Impacts with Mitigation).

Biological Resources

The proposed project would not have a substantial adverse impact on federally protected wetlands. The proposed project would not have a substantial adverse impact on 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. The proposed project would not conflict with local policies or ordinances protecting biological resources. Compliance with City regulations concerning the destruction of trees as outlined in project requirement PR4.3A would ensure this impact is less than significant.

Analysis of Project Modifications

The project modifications would not affect federally protected wetlands, movement of native resident or migratory fish or wildlife species, or wildlife corridors. The effects of project modifications on other biological resource thresholds are discussed in Section 5.3 (Less-than-Significant Impacts with Mitigation).

Geology, Soils, and Mineral Resources

Development of the proposed project would not expose people and/or structures to potentially substantial adverse effects, including the risk of loss, injury, or death, involving landslides and/or slope instability, liquefaction or strong seismic groundshaking. Compliance with applicable federal, state, and local regulations would ensure this impact is less than significant.

Construction and operation of the proposed project would not result in substantial soil erosion, dust, unstable soil conditions, or landslides, mudslides, flooding, siltation, or severe scarring from earth-moving activities on slopes of 15 percent or more. This would be a less-than-significant impact because slope stability, soil stability, and seismic-resistant design of structures proposed for human occupancy are required by the City of San Bernardino General Plan and Building Code and are enforced by City and state regulations.

The proposed project would not result in the loss of availability of a known valuable mineral resource or of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. The proposed project would be located in a Mineral Resource Zone as adopted by the State Mining Geology Board and identified in the City's General Plan, but has not been designated as an IE land use zone.

Analysis of Project Modifications

The project modification would not affect geology, soils, or mineral resources. The only project modification that relates to geology and soils relates to where excavated soil will be transported. Grading activities would remain as described in the Final EIR.

Hazards and Hazardous Materials

Construction and operation of the proposed project could involve the routine transport, use, and disposal of hazardous materials, but no significant risk from accidental upset or exposure of construction workers or employees would occur. Compliance with existing regulations pertaining to hazardous materials would ensure that this impact would remain less than significant.

The proposed project is located on a site that is included on a list of hazardous materials sites. However, construction or operation of the project would not create or result in a significant hazard to the public or the environment. The proposed project is within a designated High Wind Area but would be consistent with City wind-resistant design standards. Compliance with project requirement PR4.6A would ensure that the impact would be less than significant.

Implementation of the proposed project would not result in adverse wind effects affecting adjacent property during periods of high-velocity wind. Compliance with project requirement PR4.6A would ensure that the wind effect on adjacent properties would be less than significant.

Analysis of Project Modifications

The proposed modifications would not change the overall grading plan or the areas of the site that would be disturbed, nor would the project involve any transport, use, or disposal of hazardous materials not already identified in the Final EIR.

Hydrology and Water Quality

Construction of the proposed project could increase stormwater pollutant loads or concentrations, but would not result in a violation of water quality standards or a substantial degradation of water quality. Compliance with the identified project requirements PR4.7A through PR4.7D would ensure that this impact would remain less than significant.

Construction of the proposed project would substantially alter the existing site drainage pattern but would not result in substantial on-site or off-site erosion. Compliance with the identified project requirements PR4.7A through PR4.7E would ensure that this impact would remain less than significant.

The proposed project would substantially alter the existing site drainage pattern and increase the rate of stormwater runoff, but would not significantly contribute to off-site flooding or exceed stormwater conveyance capacity.

Operation of the proposed project would substantially alter the existing site drainage pattern and increase peak runoff rates and total storm flow volumes, but would not result in downstream bed or bank erosion. The impact would be less than significant.

Analysis of Project Modifications

Grading activities that could affect drainage are as identified in the Final EIR and would not change with the project modifications. The project would not result in substantial on-site or off-site erosion. The project would continue to comply with all applicable requirements related to drainage and soil erosion.

Land Use and Planning

Implementation of the proposed project would not conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the proposed project adopted for the purpose of avoiding or mitigating an environmental effect.

Analysis of Project Modifications

The project modifications would not affect the existing or proposed land uses on the site and the analysis would remain the same as in the Final EIR.

Noise

Construction activities associated with the proposed project would not generate noise levels that exceed the noise standards established by the City of San Bernardino Municipal Code at off-site sensitive receptors. Project requirement PR4.9A would ensure that this impact would remain less than significant.

Operation of the proposed project would not generate noise levels that exceed the noise standards established by the City of San Bernardino Municipal Code at off-site sensitive receptors. Construction activities associated with the proposed project would not generate or expose persons or structures off site to excessive groundborne vibration. Operation of the proposed project would not generate or expose sensitive receptors on or off site to excessive groundborne vibration or groundborne noise levels.

Construction activities associated with development of the proposed project would result in a substantial temporary or periodic increase in ambient noise levels. However, the project's construction noise impacts would be temporary, would not occur during recognized sleep hours, and would be not impact noise-sensitive uses.

Operation of the proposed project would generate increased local traffic volumes but would not cause a substantial permanent increase in ambient noise levels in the project vicinity that exceeds the threshold of significance established in this EIR.

Analysis of Project Modifications

Construction activities and operation would remain the same as analyzed in the EIR. There would be no substantial changes in the noise environment as a result of the changed soils hauling scenario, except that noise from freeway traffic during construction would be reduced compared to the project as analyzed because fewer haul trucks would utilize the freeway to transport excavated soil. Therefore, the noise would be reduced for the residential uses along I-215.

Public Services

Implementation of the proposed project could increase the demand for fire protection services, but would not require the construction of new or physically altered facilities to accommodate the increased demand for service and maintain acceptable response times. Further, implementation of project requirements PR4.10A through PR4.10C would ensure that this impact would remain less than significant.

Construction and operation of the proposed project would increase the demand for police protection services, but it would not require the construction of new or physically altered facilities to accommodate the increased demand for service or maintain acceptable response times. Further, implementation of project requirements PR4.10D through PR4.10F would ensure that this impact would be less than significant.

Analysis of Project Modifications

The project modifications would have no effect on public services. Construction and operational activities would remain the same as identified in the Final EIR with the exception of the modified soil export, which would not change the impact on public services.

Transportation/Traffic

The proposed project would not increase hazards due to a design feature or incompatible uses. The proposed project would not result in inadequate emergency access. Implementation of mitigation measures MM4.6-3 and MM4.6-4, identified within Impact 4.6-4 of this EIR, would ensure adequate emergency access. The proposed project would provide adequate parking. The proposed project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

Analysis of Project Modifications

Because fewer trucks would utilize the freeway to transport excavated soil, traffic on I-215 would be reduced in I-215 compared to the project analyzed in the Final EIR. All other characteristics of the project remain the same, and would not change the analysis in the EIR.

Utilities and Service Systems

Implementation of the proposed project would not require or result in the construction of new or expanded water conveyance infrastructure or treatment facilities, the construction of which could cause significant environmental effect. Implementation of the proposed project would generate an additional demand for water; however, the additional demand would be adequately served by anticipated water entitlements and resources. Implementation of the proposed project would not generate solid waste that exceeds the permitted capacity of the Colton Landfill, San Timoteo Landfill, or the Mid Valley Landfill. Implementation of the proposed project would comply with applicable federal, state, and local statues and regulations related to solid waste. Implementation of the proposed project would not exceed wastewater treatment requirements of the Santa Ana Regional Water Quality Control Board.

Implementation of the proposed project would not require the construction of new water or wastewater treatment facilities, nor would implementation of the project increase wastewater generation such that treatment facilities would be inadequate to serve the proposed projects projected wastewater flows, in addition to the provider's existing commitments. Implementation of the proposed project would not require the construction of new stormwater drainage facilities or the expansion of existing facilities.

Analysis of Project Modifications

The project modifications would have no effect on utilities and service systems. Construction and operational activities would remain the same as identified in the Final EIR with the exception of the modified soil export, which would not change the impact on utilities.

Energy and Climate Change

The proposed project would not encourage the wasteful or inefficient use of energy. The proposed project would not require new energy production or transmission facilities, the construction of which would cause significant environmental effects.

Analysis of Project Modifications

The overall emissions during construction would be reduced compared to the project as analyzed in the Final EIR because of changes to the soil export scenario. This would reduce greenhouse gas emissions and result in lower utilization of energy resources during construction. Operation would remain the same as analyzed in the EIR.

3.3 LESS-THAN-SIGNIFICANT IMPACTS WITH MITIGATION

Aesthetics

Construction activities under the proposed project could degrade the existing visual character or quality of the site and its surroundings. The project site would be prepared, excavated, and graded to accommodate the new building foundation. During grading for development, views of disturbed soils, stockpiles, construction materials and equipment would be visible from I-215 as well as the neighboring businesses to the northwest and the nearby industrial businesses to the south and east. Incorporation of mitigation would reduce this impact to less than significant.

Implementation of the proposed project would create a new source of substantial light or glare that could adversely affect day or nighttime views in the area. This is a potentially significant impact. Project requirements PR4.1A, PR4.1B, and PR4.1C would reduce this impact to a less-than-significant level.

Analysis of Project Modifications

The revisions to the project as outlined in this Addendum would not change any of the construction activities as outlined in the EIR. Changes to identification of biological resources and soil export locations would not result in any effects to aesthetics and visual quality. Mitigation would continue to reduce this impact to less than significant.

Air Quality

As noted in the EIR, development of the proposed project could expose sensitive receptors to substantial pollutant concentrations due to project-generated toxic air emissions. The maximum cancer risk predicted at a residence near the project site was 21.68 in 1 million, located north of Kendall Drive between Palm Avenue and Olive Avenue, while the maximum cancer risk predicted at the Crestview Baptist Church and Palm Elementary School were 1.17 and 0.04 in 1 million, respectively. In addition, the maximum cancer risk predicted for on- and off-site worker receptors near the project site was 8.79 in 1 million, located along the fenceline between the project site and the Denny's Restaurant to the west. Without mitigation the maximum residential impacts exceed the SCAQMD threshold of 10 in a million. With the implementation of mitigation, the maximum cancer risk for residential receptors can be reduced to between 9.98 and 6.72 in a million. As the implementation of mitigation would reduce impacts from the proposed project to below the thresholds of significance established by SCAQMD for cancer risk and chronic non-cancer health risks, this impact would be less than significant.

Analysis of Project Modifications

The Final Environmental Impact Report (Final EIR) for the Palm/Industrial project (September 2011) included a mitigation measure that limits the quantity of cut/fill activity to 4,375 cubic yards per day or less and assumes a maximum export of 65 truck loads per day. The cut/fill activity limitations were based on the fugitive dust thresholds, while the number of trucks per day was limited by NO_X emissions based on distance traveled. Under the revised analysis, half of the soil will now be transported to a known SANBAG site located less than 0.25 mile from the project site, while the remaining 100,000 cubic yards will be exported offsite to an undetermined location. The revised haul scenario was modeled using URBEMIS 2007 (to match the model used in the Final EIR analysis) and the results are included as Appendix B to this Addendum.

Because the site is undetermined, the default round trip distance of 20 miles was used to calculate emissions. While the maximum daily cubic yards remains constrained by fugitive dust emissions (fugitive dust is a result of grading/moving soil and not truck transport), NO_X emissions from on-road trucks would be substantially reduced due to the reduction in vehicle miles traveled per round trip. Using a round trip distance of 0.5 mile for transport to the SANBAG site and 20 miles for transport of the remaining soil, an average round trip distance of 10.25 miles was used to determine emissions from the haul trucks. With the assumption that each truck can hold 20 cubic yards, to export the maximum of 4,375 cubic yards it would require a maximum of 219 trucks per day. The following table also shows daily emissions based on a 10.25 round-trip hauling distance. Assuming a maximum distance of 10.25 miles per round trip, 219 daily truck trips would exceed SCAQMD threshold for NO_X. In order to remain below SCAQMD threshold while maintaining an average round-trip distance of 10.25 miles a maximum of 134 truck trips can occur per day. Using 134 trucks per day would result in duration of 75 days for soil export.

As shown in Table AQ-1 (Emissions from Cut/Fill Activity and Haul Trucks [lbs/day]), emissions of NO_X and PM_{10} are anticipated to increase slightly over what was identified in the FEIR; however, by limiting haul trucks to 134 trucks per day, emissions of PM_{10} and NO_X will remain below regulatory thresholds.

Table AQ-1	Emissions from Cut/Fill Activity and Haul Trucks (lbs/day)					
Emissions Source	*2011 FEIR 20-Mile Round Trip[a] (65 truck trips)*		*Revised Analysis 10.25-Mile Round Trip[b] (219 truck trips)*		*Revised Analysis 10.25-Mile Round Trip[c] (134 truck trips)*	
	NO_X	*PM_{10}*	*NO_X*	*PM_{10}*	*NO_X*	*PM_{10}*
Cut/Fill[d]						
Grading	0.00	141.56	0.00	141.56	0.00	141.56
Off-Road Vehicles	60.72	3.18	60.72	3.18	60.72	3.18
Worker Trips	0.15	0.02	0.15	0.02	0.15	0.02
Haul Trucks						
On-Road Vehicles	36.11	1.58	63.50	2.79	38.88	1.17
Total[e]	***96.97***	***146.35***	***124.37***	***147.56***	***99.75***	***146.48***
SCAQMD Threshold	100	150	100	150	100	150
Significant?	No	No	**Yes**	No	No	No

a. SOURCE: Atkins, URBEMIS Model (August 2011) (Palm Industrial – Revised August 2011 – Default Soil Export - Mitigated)
b. SOURCE: Atkins, URBEMIS Model (November 2012) (Palm Industrial – Revised November 2012 – 10.25 mile Haul Truck Round Trip Mitigated – 219 Trucks)
c. SOURCE: Atkins, URBEMIS Model (November 2012) (Palm Industrial – Revised November 2012 – 10.25 mile Haul Truck Round Trip Mitigated)
d. Cut/Fill values are taken directly from the 2011 FEIR as the emissions estimates from on-site work are not anticipated to change. Emissions from fugitive PM_{10} is the limiting factor on daily soil disturbance, and this cannot be reduced any further.
e. Columns may not add exactly due to rounding. Individual and total values taken directly from the modeling output.

The revised analysis from September of 2012 identified that maximum number of haul trucks required to remove the 4,375 cubic yard maximum daily disturbance would be 219 trucks (assuming 20 cubic yards per truck). Given the 219 truck daily maximum, the analysis determined that if the haul truck route was 6.25 miles round trip or less, then all 219 truck trips could occur and regulatory thresholds would not be exceeded (see Table AQ-2 [September 2012 Revision Emissions from Cut/Fill Activity and Haul Trucks (lbs/day)]).

The September 2011 Final EIR for the Palm/Industrial project included a mitigation measure restricting the number of cubic yards per day of cut/fill activity and the maximum export of trucks. As the above analysis indicates, under the revised soil export scenario, up to 134 truck trips per day could occur and emissions thresholds would not be exceeded. Based on the revised analysis, Mitigation Measure MM2.4-5(a) from the FEIR is revised as follows (strikethrough text represents removed text and double-underlined text represents added text):

MM4.2-5(a) *The developer shall develop a construction schedule approved by the City such that the grading/excavation period results in a maximum on-site cut and fill equal to 4,375 cubic yards or less per day~~, with a maximum export of 65 truck loads per day~~. The number of haul trucks shall be limited based on the round-trip haul distance using the following guidelines:*

a. Assuming a maximum haul truck round trip distance of 10.25 miles, maximum export is limited to 134 haul truck trips per day.

b. Assuming a maximum haul truck round trip distance of 6.25 miles or less, 219 haul truck trips can occur per day.

c. Assuming (a) and (b) above, 21.25 daily truck trips can be added for every mile reduction in haul truck trip distance between 10.25 miles and 6.25 miles per round trip.

Table AQ-2 September 2012 Revision Emissions from Cut/Fill Activity and Haul Trucks (lbs/day)				
Emissions Source	*2011 FEIR 20-Mile Round Trip[a] (65 truck trips)*		*September 2012 Revision 6.25-Mile Round Trip[b] (219 truck trips)*	
	NO_X	*PM_{10}*	*NO_X*	*PM_{10}*
Cut/Fill[c]				
Grading	0.00	141.56	0.00	141.56
Off-Road Vehicles	60.72	3.18	60.72	3.18
Worker Trips	0.15	0.02	0.15	0.02
Haul Trucks				
On-Road Vehicles	36.11	1.58	37.86	1.66
Total[d]	***96.97***	***146.35***	***98.73***	***146.43***
SCAQMD Threshold	100	150	100	150
Significant?	No	No	No	No

a. SOURCE: URBEMIS Model, Atkins August 2011 .(Palm Industrial – Revised August 2011 – Default Soil Export - Mitigated)
b. SOURCE: URBEMIS Model, Atkins August 2012b.(Palm Industrial – Revised August 2012 – 6.25 mile Haul Truck Round Trip Mitigated)
c. Cut/Fill values are taken directly from the 2011 FEIR as the emissions estimates from onsite work is not anticipated to change. Emissions from fugitive PM_{10} is the limiting factor on daily soil disturbance, and this cannot be reduced any further.
d. Columns may not add exactly due to rounding. Individual and total values taken directly from the modeling output.

Biological Resources

The Final EIR identified that the proposed project could have a substantial adverse impact on species identified as candidate, sensitive, or special status, riparian habitat or sensitive natural community, an MBTA-protected occupied nest, or interfere with roosting or foraging habitat for migratory species, sensitive avian species, or raptors. These impacts were identified as potentially significant, which would be reduced to less than significant through implementation of mitigation measures MM4.3-1 through MM4.3-4, MM4.3-7, and MM4.3-8.

Analysis of Project Modifications

This section addresses inconsistencies or inaccuracies of the biological resources section of the EIR that are based on new or updated information pertaining to special-status species, habitats, or potentially jurisdictional features, and include the following:

1. United States Fish and Wildlife Service (USFWS) protocol surveys for the California gnatcatcher (*Polioptila californica californica*) conducted in May and June 2012 (LSA 2012b)
2. USFWS protocol surveys for the San Bernardino Kangaroo Rat (*Dipodomys merriami parvus*) conducted in June 2012 (LSA 2012c)
3. Jurisdictional delineation of potential waters of the U.S. and California conducted in July 2012 (Cardno ENTRIX 2012a)
4. Approved Jurisdictional Determination regarding presence/absence of geographic jurisdiction (USACE 2013)
5. Biological field survey conducted in July 2012 (Cardno ENTRIX 2012b)

6. Review of recent literature/databases regarding special-status species (CNDDB)
7. Evaluation of Potential Jurisdictional Streambed Resources (LSA 2012c)

Vegetation Communities

The habitats described in the 2007 and 2010 biological technical reports (PBS&J 2007; PBS&J 2010) prepared for the Project are predominantly the same in quantity and quality as observed during the 2012 biological survey. However, due to slight changes to the finalized project site plan, and in consideration of the biological field survey and jurisdictional delineation conducted by Cardno ENTRIX in July 2012, slight changes to the acreages and classification of the habitats within the Study Area have been made, as shown in Table BIO-1 (Vegetation Communities in the Project Site) and depicted in Figure 1 (Vegetation Communities).

Table BIO-1 Vegetation Communities in the Project Site

Vegetation Communities	*Acreage as Identified in EIR*	*Revised Acreage*
Coastal Sage Scrub	20.91	21.06
Disked/Bare Ground	13.79	14.49
Ruderal	3.15	3.18
Developed	N/A	0.53

The descriptions of the coastal sage scrub, disked, and ruderal habitats remain unchanged, with the exception of the addition of "bare ground" and "developed" areas, and the aforementioned slight changes in acreage. Several unvegetated, dirt roads were misclassified as part of the coastal sage scrub community, and the vegetation mapping has been updated to change them to "disked/bare ground." A small, developed area was also added to the project site to include the vacant dirt and gravel lot in the northwestern portion of the Project site.

The EIR did not rely on any formal jurisdictional delineation of hydrologic features to either properly classify or assess them as potential state and federal waters. Based on the July 2012 wetland delineation of the Project site (Cardno ENTRIX 2012a), the 0.51-acre "ephemeral wash" that was identified in the 2007 biological report has been modified, as it is more characteristic of an erosional or topographic feature rather than an ephemeral wash. This is due to its limited function in water conveyance (e.g., limited to localized runoff), its lack of defined features common to ephemeral drainages (e.g., consistent bed and bank), and that its origin is an adjacent man-made stormwater drainage from the on-ramp of Interstate 215s. Lastly, as the vegetated portion of this feature consists of coastal sage scrub species, as accurately described in the 2007 biological report, the updated vegetation mapping depicts this as coastal sage scrub rather than a misidentified "ephemeral wash."

Critical Habitat

The Final EIR indicated the project area lies within critical habitat designated for coastal California gnatcatcher. However, based on recent review of the USFWS critical habitat portal, the study area does not occur within any USFWS-designated critical habitat, including that which has been finalized by the

USFWS for the coastal California gnatcatcher and San Bernardino kangaroo rat (USFWS 2012). Mitigation measures MM4.3-2 and MM4.3-9 have been revised to reflect this change.

Special-Status Wildlife Species

Recent literature and database review included an updated review of all sources used in the Final EIR, as well as recently conducted biological surveys and reports, which are provided in an appendix to Appendix B. In consideration of habitat preferences and known ranges of special-status wildlife species that could potentially occur in the region, there were no additional special-status wildlife species that could potentially occur in the study area that were not previously identified in the EIR. Protocol surveys were recently conducted for coastal California gnatcatcher and San Bernardino kangaroo rats, which were determined to be absent from the project site; however, these negative findings do not require any corrections to the EIR.

Special-Status Plant Species

Based on recent literature and database review, and taking into account the habitat, elevation, and blooming periods of each species, the following six special-status plant species have a moderate or greater potential to occur within the Study Area, and were not previously identified in the EIR.

- Thread-leaved brodiaea (*Brodiaea filifolia*)
- Parry's spineflower (*Chorizanthe parryi* var. *parryi*)
- Slender-horned spineflower (*Dodecahema leptoceras*)
- Santa Ana River woollystar (*Eriastrum densifolium* ssp. *sanctorum*)
- Robinson's pepper-grass (*Lepidium virginicum* var. *robinsonii*)
- Parish's desert-thorn (*Lycium parishii*)

The presence or absence of these special-status plant species, along with Plummer's mariposa lily (*Calochortus plummerae*) and mesa horkelia (*Horkelia cuneata* ssp. *puberula*), which were previously identified in the Final EIR, would be determined during preconstruction floristic surveys per the revised mitigation measure MM4.3-7.

Potential Federal and State Jurisdictional Waters

Federal Waters

The Project area contains two topographic features that are unnamed and not identified on the San Bernardino North USGS topographic map. Historic (1938) aerial images of the site show remnants of stream channels crossing the site, but they have been cut off from the stream that was their apparent source decades ago by construction of a road now known as SR-206/Kendall Drive. From surveys of the features, it appears that they intercept localized stormwater sheetflow from portions of the project site and roadway runoff from adjacent portions of I-215 and Palm Avenue (Figure 2 [Delineation of Topographic Features]).

The topographic features were delineated in accordance with the 1987 Corps of Engineers Wetlands Delineation Manual and do not contain an Ordinary High Water Mark (OHWM), nor does it meet the Clean Water Act (CWA) definition of "other waters" of the U.S (Cardno ENTRIX 2012). Therefore,

Source: CardoENTRIX, November 21, 2012.

100030936 | Palm-Industrial CEQA

Figure 1
Vegetation Communities

ATKINS

Source: CardoENTRIX, November 21, 2012.

100030936 | Palm-Industrial CEQA

Figure 2

Delineation of Topographic Features

ATKINS

based on the results of the jurisdictional delineation, the entire 34.7-acre Study Area, including the delineated topographic features, do not fall under the regulatory authority of the U.S. Army Corps of Engineers (USACE) or the Santa Ana Regional Water Quality Control Board (RWQCB) per CWA Sections 404 and 401.

An approved jurisdictional determination from USACE dated January 11, 2013 veritifed there are no waters of the United States on the project site (please see Appendix C). Therefore, CWA Section 404 and Section 401 permits are not required.

State Waters: Porter-Cologne Act and CDFW Jurisdiction

The Porter-Cologne Act is the principal law governing water quality in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. Unlike the Clean Water Act, Porter-Cologne applies to both surface water and ground water. An August 10, 2012, consultation with the Santa Ana Regional Water Quality Control Board (RWQCB) confirmed that the delineated features are not subject to the jurisdiction of the RWQCB pursuant to the Porter-Cologne Water Quality Control Act (Adelson 2012). Mark Adelson Chief, Regional Planning Programs Section of the Santa Ana RWQCB concluded that no Report of Waste Discharge or Waste Discharge Requirements are required for this project. The basis for the conclusion was that other than ground water recharge, the site does not appear to support any water quality beneficial uses recognized by the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan) (Adelson 2012). A revision to mitigation measure MM4.3-10 has been made to only require a Report of Waste Discharge if the RWQCB determines it is necessary.

The CDFW California Department of Fish & Wildlife (CDFW),[1] through provisions of the California Fish and Game Code (Sec. 1600 et seq.), is empowered to issue agreements for any substantial alteration of a river, stream, or lake where fish or wildlife resources may be substantially adversely affected. The CDFW's Streambed Alteration Program, as administrated per Section 1602, requires an entity to notify the CDFW of any proposed activity that may substantially modify a river, stream, or lake. Specifically, notification is required by any person, business, state or local government agency, or public utility that proposes an activity that will:

- Substantially divert or obstruct the natural flow of any river, stream or lake
- Substantially change or use any material from the bed, channel, or bank of any river, stream, or lake
- Deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake

The notification requirement applies to any work undertaken in or near a river, stream, or lake that flows at least intermittently through a bed or channel.

Two independent surveys of the Study Area were performed to assess the topographical features for potential jurisdiction under 1602, one during the dry season (Cardno ENTRIX 2012a) and one during the wet season (LSA Associates 2012c). Results of both surveys concluded that the two features (Topographic Feature 1 and Topographic Feature 2; Figure 2) do not contain the required elements of a

[1] As of January 1, 2013, California Department of Fish & Game is now known as California Department of Fish & Wildlife.

stream that would necessitate the need for a Streambed Agreement under Section 1602 (i.e., sediment deposits and debris lines, Photographs 1 through 5).[2] Specifically, there are a few isolated locations where erosion has taken place, creating a shallow shelf that resembles a bank. However, these areas are very short, discontinuous, and infrequent sections of the overall length of the features, which otherwise show no discernible evidence of defined bed and banks. Some minor scour was observed along Topographic Feature 1, where stormwater from I-215 enters the site, presumably a result of localized runoff. Neither feature connects to another stream or channel in the project vicinity. In fact, both features dissipate onto flat surfaces within the Study Area and do not reappear. No standing or flowing water was observed in any survey dating back to 2007, nor was any groundwater or moist soil encountered when excavating wetland pits during the 2012 delineation performed for USACE. No riparian vegetation is associated with this feature, and all vegetation is upland species typical of the ruderal and sage communities found on site.

The characteristics of these two features do not coincide with the channel features typical of those found in streams. Consequently, as the features do not have a defined bed or bank, riparian vegetation, or aquatic habitat, these topographical features do not appear to contain the essential elements of a stream as defined in California Code of Regulations Title 14, Section 1.72, and would not require a Streambed Agreement pursuant to California Fish and Game Code Section 1600.[3]

Revised Biological Resources Mitigation Measures

MM4.3-2 *If California gnatcatcher or San Bernardino kangaroo rat is discovered to occupy the site, then to the extent feasible, habitat for these species shall be avoided through the establishment of a buffer area of 200 feet. Such areas shall be flagged, and encircled with an exclusionary fence. These areas shall be preserved in a conservation easement or other acceptable agreement with a USFWS and/or ~~CDFG~~CDFW approved agency. Any such agreements shall be conducted in coordination with the USFWS and/or ~~CDFG~~CDFW.*

If impacts on California gnatcatcher or San Bernardino kangaroo rat or their ~~occupied~~ habitat are unavoidable, then formal consultation with the USFWS pursuant to either Section 7 (with federal nexus) or Section 10 (without federal nexus) of FESA, and with ~~CDFG~~CDFW pursuant to the CESA would be required. Specific mitigation measures would be developed as a part of the agency consultation, but would include a combination of feasible on-site avoidance and preservation, and/or creation and preservation of off-site habitat, or payment into an off-site mitigation bank. The mitigation ratio for compensation of suitable habitat lost will not be less than 1:1~~, and an additional 1:1 for the loss of Critical Habitat~~.

MM4.3-7 *Listed and Nonlisted Sensitive Plant Species. Due to potentially suitable habitat present within the project site for ~~two~~ eight ~~nonlisted~~ sensitive plant species, the project Applicant shall retain a qualified biologist or botanist to conduct a pre-construction survey of the area within the footprint of impact, and extended 50 feet outside of the impact area, as appropriate. The survey shall be conducted according to applicable CNPS and ~~CDFG~~CDFW protocols, during the species blooming period or,*

[2] All jurisdictional determinations and/or opinions are subject to review and verification by the appropriate regulatory agencies.
[3] All jurisdictional determinations and/or opinions are subject to review and verification by the appropriate regulatory agencies.

if applicable and appropriate, immediately prior to the onset of project-related disturbances. The purpose of the pre-construction survey shall be to locate any special-status plant species that have a moderate or greater potential to occur within or directly adjacent to the proposed area of disturbance. These surveys shall be restricted to habitat types that could support special-status plant species that have the potential to occur within the proposed project's impact area, including the following plant species:

- *Thread-leaved brodiaea*
- *Plummer's mariposa lily*
- *Parry's spineflower*
- *Slender-horned spineflower*
- *Santa Ana River woollystar*
- *Mesa horkelia*
- *Robinson's pepper-grass*
- *Parish's desert-thorn*

MM4.3-8 *Nonlisted Sensitive Wildlife Species. Due to potentially suitable habitat present within the project site for ten nonlisted sensitive wildlife species, the project Applicant shall retain a qualified biologist to conduct a pre-construction survey of the area within the footprint of impact, and extended 50 feet outside of the impact area, as appropriate. The survey shall be conducted according to any ~~available CDFG~~ required protocols, prior to the onset of project-related disturbances. The purpose of the pre-construction survey shall be to locate any special-status wildlife species that have a moderate or greater potential to occur within or directly adjacent to the proposed project's impact area, and would not be mobile enough to avoid construction activities. These surveys shall including the following species:*

- *Northern harrier (nesting)*
- *Cooper's hawk (nesting)*
- *Red-tailed hawk (nesting)*
- *Ferruginous hawk (nesting)*
- *Peregrine falcon (nesting)*
- *American kestrel (nesting)*
- *Bell's sage sparrow (nesting)*
- *California horned lark (nesting)*
- *Northwestern San Diego pocket mouse*
- *Pallid San Diego pocket mouse*
- *San Diego black-tailed jackrabbit*
- *San Diego desert woodrat*
- *Los Angeles pocket mouse*
- *Coast (San Diego) horned lizard*
- *Orange-throated whiptail*
- *Rosy boa*

If no nonlisted sensitive wildlife species are determined to be within or directly adjacent to the proposed project's impact area, then no further mitigation would be necessary and impacts related to nonlisted

sensitive wildlife species are considered less than significant. If nonlisted sensitive wildlife species are determined to be present within or directly adjacent to the proposed project's impact area, and cannot be avoided, ~~the following mitigation shall be implemented to reduce impacts to a less-than-significant level:~~

~~a. R~~replacement of coastal sage scrub habitat described under MM4.3-9 will provide replacement habitat concurrently for the above species.

~~b. A mitigation report shall be submitted to the CDFG that includes, at a minimum, a description of methodology, including dates of field visits; the names of survey personnel with résumés; a list of references cited and persons contacted; and a map showing the location(s) of any nonlisted sensitive wildlife species observed within or adjacent to the project site.~~

The project Applicant shall prepare a mitigation report that shall be submitted to the CDFW that includes, at a minimum, a description of methodology, including dates of field visits; the names of survey personnel with résumés; a list of references cited and persons contacted; and a map showing the location(s) of any non-listed sensitive wildlife species observed within or adjacent to the project site.

~~c. Five days prior to grading of the project site, sensitive rodent and reptilian species shall, to the extent possible, be passively relocated to suitable adjacent habitat. Collection and relocation of wildlife shall only occur with the proper scientific collection and handling permits.~~

If required by CDFW or USFWS, prior to grading of the project site, sensitive rodent and reptilian species shall, to the extent feasible, be passively or actively relocated to suitable habitat. Collection and relocation of wildlife shall only occur with the proper scientific collection and handling permits.

~~d. The mitigation report shall also detail the relocation and avoidance strategy and shall be submitted to the CDFG, and, if required, the USFWS for comments prior to project implementation.~~

If relocation does occur, the mitigation report described in MM4.3-9(b) shall also detail the relocation and avoidance strategy and shall be submitted to the CDFW, and, if required, the USFWS for comments prior to project implementation.

MM4.3-9 *To compensate for losses of sensitive on-site habitat ~~resources~~ (e.g., coastal sage scrub), the Applicant shall do one or more of the following~~, which shall be approved by the USFWS as full mitigation for loss of habitat~~ prior to grading activities:*

a. Purchase mitigation credits at a ~~USFWS approved~~ mitigation bank at a ratio~~s~~ of no less than ~~2:1~~1:1

b. Preserve, create, restore, and/or enhance coastal sage scrub habitat within other properties or approved mitigation programs available at the time of grading

c. A combination of the above.

MM4.3-10 *Prior to the issuance of any grading permits, the project applicant shall apply for and receive a Certificate of Waste Discharge if required from the RWQCB for the removal of the ~~wash~~ topographic features.*

MM4.3-11 *Prior to the issuance of any grading permits, the project applicant shall apply for a Sections 1600–1616 Lake and Streambed Alteration Agreement from the ~~CDFG~~CDFW for the removal of ~~the wash~~ areas verified as CDFW jurisdictional under Sections 1600–1616. If ~~the CDFG determines that a Sections 1600–1616~~ a Lake and Streambed Alteration Agreement is not required, then no further mitigation measures would be required. If the ~~CDFG~~CDFW does require a ~~Sections 1600–1616~~ Lake and Streambed Alteration Agreement, payment of fees to cover the cost of the agreement, and compliance with the conditions of the agreement will be required. These conditions ~~will likely~~*

~~include will likely~~ could include measures to preserve and/or replace habitat of similar or better quality at an on-site, or if on-site preservation is not feasible, at a ~~CDFG~~CDFW approved off-site location.

Cultural Resources

Construction of the proposed project could cause a substantial adverse change in the significance of previously unknown archaeological resources pursuant to CEQA Guidelines Section 15064.5. This is a potentially significant impact. Implementation of mitigation measure MM4.4-1 and MM4.4-2 would reduce this impact to less than significant.

Construction activities associated with implementation of the proposed project could directly or indirectly result in damage to, or the destruction of, unique paleontological resources. This is a potentially significant impact. Implementation of mitigation measures MM4.4-1 through MM4.4-3 would reduce this impact to less than significant.

Construction activities associated with implementation of the proposed project could disturb human remains, including those interred outside of formal cemeteries. This is a potentially significant impact. Implementation of mitigation measure MM4.4-4 would reduce this impact to less than significant.

Analysis of Project Modifications

The proposed project modifications would have no effect on cultural resources that was not previously analyzed in the EIR. The conditions of the project site have not changed since the original analysis in the EIR, and there are no changes to the site plan or development components. Mitigation measures as identified in the EIR would continue to be implemented, reducing potential impacts to archaeological and paleontological resources to less than significant.

Hazards and Hazardous Materials

Construction and operation of the proposed project could expose construction workers or the public to significant health and safety hazards through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. This is considered a potentially significant impact; however, compliance with applicable federal, state, and local regulations and implementation of mitigation measures MM4.6-1 and MM4.6-2 would reduce this impact to a less-than-significant level.

Implementation of the proposed project could interfere with an adopted emergency response plan and/or emergency evacuation plan. This is a potentially significant impact. Implementation of mitigation measure MM4.6-3 would reduce this impact to less than significant.

Analysis of Project Modifications

The proposed project modifications would have no affect on hazards or hazardous materials. Construction activities would remain the same as analyzed in the EIR. There would be fewer trucks accessing I-215 during excavation activities; however, because the soil is not contaminated, there would remain no substantial risk from hazardous materials upset. The conditions of the project site have not

changed since the original analysis in the EIR, and there are no changes to the site plan or development components. Mitigation measures as identified in the EIR would continue to be implemented, reducing potential impacts with respect to hazards and hazardous materials to less than significant.

Hydrology and Water Quality

Operation of the proposed project could increase stormwater pollutant loads or concentrations, but would not result in a violation of water quality standards or a substantial degradation of water quality. Compliance with the identified project requirements PR4.7A through PR4.7C and PR4.7E and mitigation measure MM4.7-1 would ensure that this impact would remain less than significant.

The proposed project could increase stormwater runoff and increase pollutant loads in stormwater runoff. This is a potentially significant impact. Compliance with the identified project requirements PR4.7A through PR4.7E and mitigation measure MM4.7-1 would ensure that this impact would remain less than significant.

The proposed project would not substantially otherwise degrade water quality or beneficial uses. Compliance with the identified project requirements PR4.7A through PR4.7G and mitigation measure MM4.7-1 would ensure that this impact would remain less than significant.

Analysis of Project Modifications

The proposed project modifications would have no affect on hydrology or water quality. Construction activities would remain the same as analyzed in the EIR. The project development would continue to comply with all applicable regulations pertaining to soil erosion and stormwater runoff. The conditions of the project site have not changed since the original analysis in the EIR, and there are no changes to the site plan or development components. Mitigation measures as identified in the EIR would continue to be implemented, reducing potential impacts to hydrology and water quality to less than significant.

Transportation/Traffic

The proposed project would add traffic volumes to intersections that would be potentially significant; however, implementation of mitigation measure MM4.11-1(a) and MM4.11-1(b) would bring the level of service of study area intersections to an acceptable level, and the project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system or an applicable congestion management program. This impact would be less than significant.

Analysis of Project Modifications

The project modifications would not change the operational characteristics of the proposed project, and there would be no change in the traffic analysis for operation as contained in the Final EIR. The only change in traffic would occur during construction, where fewer trucks would access I-215 during the excavation and grading phase of the proposed project, which would result in improvement of traffic at the interchange of Palm Avenue and I-215 as well as on freeway segments; however, this impact was identified as less than significant in the Final EIR, and would remain less than significant with the project

modifications. Mitigation measures as identified in the EIR would continue to be implemented, reducing potential impacts to operational traffic to less than significant.

3.4 SIGNIFICANT AND UNAVOIDABLE IMPACTS

Air Quality

Operation of the proposed project would violate an air quality standard or contribute substantially to an existing or projected air quality violation. The proposed project would generate long-term air quality impacts associated with its operation. The primary source of operational emissions would be motor vehicle emissions (mobile source emissions) generated from project-induced vehicle trips and truck trips associated with operation of the industrial warehouse. Other emissions, identified as "area source emissions," would be generated from natural gas consumption for water and space heating, landscape and building maintenance activities, and use of consumer products. The proposed project's operational emissions would exceed the SCAQMD significance thresholds for NO_X emissions from vehicle trips. Even with implementation of all feasible mitigation measures, NO_X emissions would still exceed the SCAQMD significance threshold. This impact would be significant and unavoidable.

Construction and operational activities associated with development of the proposed project would generate emissions that would result in an exceedance of localized significance thresholds for PM_{10} and $PM_{2.5}$ established by the SCAQMD, and, therefore, would expose sensitive receptors to substantial pollutant concentrations. This is considered a significant impact. Compliance with project requirements and implementation of mitigation measures MM4.2-8, MM4.2-2(a), MM4.2-2(b), and MM4.2-5(a) through MM4.2-5(d) would reduce this impact, but not to a less-than-significant level.

Analysis of Project Modifications

Emissions due to cut and fill activity and soil export would be slightly greater than as analyzed in the Final EIR, but would not be a significant increase and would remain below SCAQMD thresholds of significance. As all other construction activities would remain the same, the project modifications would not change the impact conclusions with respect to overall exceedance of localized significance thresholds for PM_{10} and $PM_{2.5}$ during other phases of construction. Similarly, the operational characteristics of the proposed project would remain the same as analyzed in the EIR, and, therefore, there would be no change in the significance conclusion for operational emissions of NO_X, which would remain a significant and unavoidable impact.

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CHAPTER 4 Other CEQA Considerations

The EIR disclosed that implementation of the proposed project would result in significant unavoidable impacts to Air Quality and Traffic. The EIR includes mitigation measures to reduce these impacts to the greatest extent feasible while achieving the objectives of the project. The proposed modifications to the project would not increase the proposed development's contribution to those previously identified significant effects. As noted in the Air Quality Technical Memorandum (Appendix A to this Addendum), the project modifications would slightly increase emissions during the excavation and grading phase of construction, but emissions would remain below SCAQMD significance thresholds and the impact would remain less than significant as identified in the Final EIR.

As described in Public Resources Code Section 21166 and CEQA Guidelines Sections 15162 and 15163, preparation of an EIR Addendum is appropriate where (1) none of the conditions called for preparation of a subsequent or supplement to an EIR have occurred, such as *(a)* substantial changes to the project or the circumstances under which the project is undertaken that would involve major revisions to the EIR due to the involvement of new significant effects or a substantial increase in the severity of previously identified significant effects, or *(b)* new information of substantial importance that was not known at the time of the EIR was certified becomes available and that new information indicates that *(i)* the project would have one or more significant effects not previously discussed in a previous EIR, *(ii)* significant effects previously examined will be substantially more severe than shown in the previous EIR, *(iii)* mitigation measures or alternatives previously found infeasible, which would substantially reduce one or more significant effects of the project, are feasible, but not adopted as part of the project, or *(iv)* mitigation measures or alternatives which are new and would substantially reduce one or more significant effects of the project are available, but not adopted as part of the project; and (2) changes to the EIR made by the Addendum do not raise important new issues about the significant effects on the environment. None of the above conditions would be met as a result of the changes to the project, and no additional environmental analysis or review is required, other than as provided in this Addendum.

No substantial changes have been proposed to the project described in the EIR that would require major revisions to the EIR. The proposed modifications to the project, including change in location for export of half of the excavated soil and changes to biological resource identification and mitigation, would not alter the total amount of development permitted on the site. None of the conditions or circumstances that would require preparation of a subsequent or supplemental EIR pursuant to Public Resources Code Section 21166 exists.

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CHAPTER 5 **References**

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———. 2012c. *San Bernardino Kangaroo Rat Survey for a 35-Acre Parcel in the City of San Bernardino, San Bernardino County, June 24–29, 2012*, July 19.

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Appendix A Air Quality Technical Memorandum

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Memorandum

To: Patrick Spillane, IDS Real Estate Group

From: Heather Dubois, Atkins

Subject: Revised Truck Activity for the Palm Industrial Project

Date: November 26, 2012

The Final Environmental Impact Report (Final EIR) for the Palm/Industrial project (September 2011) included a mitigation measure that limits the quantity of cut/fill activity to 4,375 cubic yards per day or less and assumes a maximum export of 65 truck loads per day. The cut/fill activity limitations were based on the fugitive dust thresholds while the number of trucks per day was limited by NO_X emissions based on distance traveled. At the time the analysis was completed it was unknown if the soil export would be transported to the SANBAG site located less than a ¼ mile from the project site or to another, unknown, disposal site. Because the site was unknown, the analysis assumed a modeling program's default round trip distance of 20 miles per trip.

In September of 2012 a revised analysis was conducted to determine the maximum daily truck trips for soil export if all 200,000 cubic yards of cut material was transported to the SANBAG site. The amount of cut material per day is limited to 4,375 due to the PM emissions from excavation activities as determined in the Final EIR. Assuming an average truck carries 20 cubic yards, the maximum number of daily trucks needed to remove the 4,375 cubic yards is 219. The September 2012 Revised Truck Activity analysis concluded that at a round trip distance of ½ mile, 219 daily haul truck trips would result in 3.03 lbs/day of NO_X and 0.13 lbs/day of PM_{10} and therefore would be below SCAQMD regulatory thresholds of 100 lbs/day and 150 lbs/day respectively. The September 2012 revised analysis further shows that with an average haul distance of 6.25 miles round trip, emissions would be 98.73 lbs/day for NO_X and 1.66 lbs/day for PM_{10} for 219 haul truck trips. While close to the NO_X threshold, 219 truck trips would not exceed SCAQMD thresholds. At 219 trips per day soil export would require 46 days to complete.

Since the publication of the Final EIR, and the September 7, 2012 revised analysis memorandum, changes have been made to the soil hauling scenario. It is currently anticipated that 100,000 cubic yards will be exported from the site to the nearby SANBAG site and the remaining 100,000 cubic yards will be exported to an undetermined site. This memorandum discusses the emissions associated with the revised haul scenario and adjusts the maximum number of daily haul trucks that can be used to export soil and still be within the regulatory thresholds for NO_X and PM emissions.

The Project is located on north side of Industrial Parkway, east of Palm Avenue with the City and County of San Bernardino. The project site is 38.4 acres in size, elevated, and irregularly shaped. The site is designed to have two street frontages along Industrial Parkway, a sixty-foot wide truck entrance located along the western property boundary and a forty-foot passenger vehicle entrance located on the eastern end.

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Construction emissions in the September 2011 Final EIR were calculated using the URBEMIS 2007 computer model developed for the ARB by estimating the types and number of pieces of equipment that would be used to grade and excavate the project site, construct the proposed development, and plant new landscaping within the project site. The construction activities associated with the proposed project would create diesel emissions, and would generate emissions of dust. Construction equipment within the project site that would generate criteria air pollutants could include excavators, export trucks, and loaders. Some of this equipment would be used during grading activities as well as when structures are constructed on the project site. In addition, emissions during construction and grading activities include truck trips off site to remove excavated soil from the project site. Grading would involve the export of approximately 200,000 cubic yards of soil.

The September 2011 Final EIR for the Palm/Industrial project included the following mitigation measure restricting the number of cubic yards per day of cut/fill activity and the maximum export of trucks:

> **MM4.2-5(a)** The developer shall develop a construction schedule approved by the City such that the grading/excavation period results in a maximum on-site cut and fill equal to 4,375 cubic yards or less per day, with a maximum export of 65 truck loads per day.

The maximum cubic yards per day is constrained by particulate matter (PM_{10}) emissions predominantly from fugitive dust while the number of truck loads is constrained by NO_X emissions from on-road and off-road vehicles. Note, while other criteria pollutants are emitted from haul trucks, the attached URBEMIS output shows that the ROG, CO, SO_2, and $PM_{2.5}$ emissions were not close to the thresholds in the original analysis and are not factors that will limit the number of haul trucks. Therefore, emissions from these criteria pollutants are not addressed in this revised summary.

The September 2011 Final EIR analysis that supports MM4.2-5(a) assumes SCAQMD Rule 403, with the addition of a third daily watering, for Fugitive Dust mitigation to reduce the impacts from fugitive emissions of PM_{10}. For NO_X emissions from off-road vehicles associated with construction activities the URBEMIS defaults were used. For NO_X emissions from on-road vehicles associated with truck trips, it was assumed that: (1) each truck load has a 20 cubic yard capacity; (2) 65.36 trucks per day would be used; (3) and, a default of a 20 mile round trip haul distance would be needed to dispose of the 200,000 cubic yards of exported soil. This results in approximately 153 days of export activity. As can be seen in the following table (for the 20 mile round trip scenario), under these conditions both PM_{10} and NO_X emissions are under the regulatory thresholds.

Under the revised analysis half of the soil will now be transported to a known SANBAG site located less than ¼ a mile from the project site while the remaining 100,000 cubic yards will be exported offsite to an undetermined location. Because the site is undetermined, the default round trip distance of 20 miles was used to calculate emissions. While the maximum daily cubic yards remains constrained by fugitive dust emissions (fugitive dust is a result of grading/moving soil and not truck transport), NO_X emissions from on-road trucks would be substantially reduced due to the reduction in vehicle miles traveled per round trip. Using a round trip distance of ½ mile for transport to the SANBAG site and 20 miles for transport of the remaining soil, an average round trip distance of 10.25 miles will be used to determine emissions from the haul trucks. With the assumption that each truck can hold 20 cubic yards, to export the maximum of 4,375 cubic yards it would require a maximum of 219 trucks per day. The following table also shows daily emissions based on a 10.25 round trip hauling distance. Assuming a maximum distance of 10.25 mile per round trip, 219 daily truck trips would exceed SCAQMD threshold for NO_X. In order to remain below SCAQMD threshold while maintaining an

average round trip distance of 10.25 miles a maximum of 134 truck trips can occur per day. Using 134 trucks per day would result in duration of 75 days for soil export.

Table 1: Emissions From Cut/Fill Activity and Haul Trucks (lbs/day)

Emissions Source	2011 FEIR 20 Mile Round Trip[a] (65 truck trips)		Revised Analysis 10.25 Mile Round Trip[b] (219 truck trips)		Revised Analysis 10.25 Mile Round Trip[c] (134 truck trips)	
	NO_X	PM_{10}	NO_X	PM_{10}	NO_X	PM_{10}
Cut/Fill[d]						
Grading	0.00	141.56	0.00	141.56	0.00	141.56
Off-Road Vehicles	60.72	3.18	60.72	3.18	60.72	3.18
Worker Trips	0.15	0.02	0.15	0.02	0.15	0.02
Haul Trucks						
On-Road Vehicles	36.11	1.58	63.50	2.79	38.88	1.17
TOTAL[e]	***96.97***	***146.35***	***124.37***	***147.56***	***99.75***	***146.48***
SCAQMD Threshold	100	150	100	150	100	150
Significant?	No	No	**Yes**	No	No	No

[a] Source: URBEMIS Model, Atkins August 2011 .(Palm Industrial – Revised August 2011 – Default Soil Export - Mitigated)
[b] Source: URBEMIS Model, Atkins November 2012.(Palm Industrial – Revised November 2012 – 10.25 mile Haul Truck Round Trip Mitigated – 219 Trucks)
[c] Source: URBEMIS Model, Atkins November 2012.(Palm Industrial – Revised November 2012 – 10.25 mile Haul Truck Round Trip Mitigated)
[d]. Cut/Fill values are taken directly from the 2011 FEIR as the emissions estimates from onsite work is not anticipated to change. Emissions from fugitive PM_{10} is the limiting factor on daily soil disturbance and this cannot be reduced any further.
[e] Columns may not add exactly due to rounding. Individual and Total values taken directly from the modeling output.

As shown in Table 1 above, emissions of NO_X and PM_{10} are anticipated to increase slightly over what was identified in the FEIR; however, by limiting haul trucks to 134 trucks per day, emissions of PM_{10} and NO_X will remain below regulatory thresholds.

The revised analysis from September of 2012 identified that maximum number of haul trucks required to remove the 4,375 cubic yard maximum daily disturbance would be 219 trucks (assuming 20 cubic yards per truck). Given the 219 truck daily maximum, the analysis determined that if the haul truck route was 6.25 miles round trip or less, then all 219 truck trips could occur and regulatory thresholds would not be exceeded (See Table 2).

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Table 2: September 2012 Revision Emissions From Cut/Fill Activity and Haul Trucks (lbs/day)				
	2011 FEIR 20 Mile Round Trip[a] (65 truck trips)		September 2012 Revision 6.25 Mile Round Trip[b] (219 truck trips)	
Emissions Source	**NO_X**	**PM_{10}**	**NO_X**	**PM_{10}**
Cut/Fill[c]				
Grading	0.00	141.56	0.00	141.56
Off-Road Vehicles	60.72	3.18	60.72	3.18
Worker Trips	0.15	0.02	0.15	0.02
Haul Trucks				
On-Road Vehicles	36.11	1.58	37.86	1.66
TOTAL[d]	***96.97***	***146.35***	***98.73***	***146.43***
SCAQMD Threshold	100	150	100	150
Significant?	No	No	No	No

[a] Source: URBEMIS Model, Atkins August 2011 .(Palm Industrial – Revised August 2011 – Default Soil Export - Mitigated)

[b] Source: URBEMIS Model, Atkins August 2012b.(Palm Industrial – Revised August 2012 – 6.25 mile Haul Truck Round Trip Mitigated)

[c]. Cut/Fill values are taken directly from the 2011 FEIR as the emissions estimates from onsite work is not anticipated to change. Emissions from fugitive PM_{10} is the limiting factor on daily soil disturbance and this cannot be reduced any further.

[d] Columns may not add exactly due to rounding. Individual and Total values taken directly from the modeling output.

Based on the revised analysis, Mitigation Measure MM2.4-5(a) from the FEIR should be revised as follows (strike through text represents removed text and underlined text represents added text):

> **MM4.2-5(a)** The developer shall develop a construction schedule approved by the City such that the grading/excavation period results in a maximum on-site cut and fill equal to 4,375 cubic yards or less per day~~, with a maximum export of 65 truck loads per day~~. The number of haul trucks shall be limited based on the round trip haul distance using the following guidance:
>
> a. Assuming a maximum haul truck round trip distance of 10.25 miles, maximum export is limited to 134 haul truck trips per day.
>
> b. Assuming a maximum haul truck round trip distance of 6.25 miles or less, 219 haul truck trips can occur per day.
>
> c. Assuming (a) and (b) above, 21.25 daily truck trips can be added for every mile reduction in haul truck trip distance between 10.25 miles and 6.25 miles per round trip.

ATTACHMENTS

Attachment A: September 2011 Final EIR Mitigated URBEMIS Output
Attachment B: URBEMIS Output for 10.25 Mile Round Trip Hauling Distance – 219 Truck Trips
Attachment C: URBEMIS Output for 10.25 Mile Round Trip Hauling Distance – 134 Trucks Trips
Attachment D: URBEMIS Output for 6.25 Mile Round Trip Hauling Distance – 219 Truck Trips

ATTACHMENT A

September 2011 Final EIR Mitigated URBEMIS Output

8/17/2011 12:31:05 PM

Urbemis 2007 Version 9.2.4

Combined Winter Emissions Reports (Pounds/Day)

File Name: R:\General Air Quality Info\Projects\0D2133100 - Palm-Industrial Distribution Center Project EIR\Modeling\Modeling Revisions August 2011\URBEMIS 2011\PI Revised Project 8-2011-dflt-Mitigated.urb924

Project Name: Palm Industrial - Revised August 2011 - Default Soil Export - Mitigated

Project Location: San Bernadino County

On-Road Vehicle Emissions Based on: Version : Emfac2007 V2.3 Nov 1 2006

Off-Road Vehicle Emissions Based on: OFFROAD2007

Summary Report:

CONSTRUCTION EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10 Dust	PM10 Exhaust	PM10	PM2.5 Dust	PM2.5 Exhaust	PM2.5	CO2
2011 TOTALS (lbs/day unmitigated)	10.26	96.97	48.98	0.06	566.45	4.59	571.04	118.32	4.22	122.55	11,512.12
2011 TOTALS (lbs/day mitigated)	10.26	96.97	48.98	0.06	141.76	4.59	146.35	29.63	4.22	33.85	11,512.12
2012 TOTALS (lbs/day unmitigated)	9.65	89.36	46.18	0.06	566.45	4.15	570.60	118.32	3.82	122.14	11,511.78
2012 TOTALS (lbs/day mitigated)	9.65	89.36	46.18	0.06	141.76	4.15	145.91	29.63	3.82	33.45	11,511.78
2013 TOTALS (lbs/day unmitigated)	317.88	63.67	96.21	0.19	100.01	3.00	101.68	20.89	2.73	22.43	20,559.05
2013 TOTALS (lbs/day mitigated)	143.10	63.67	96.21	0.19	100.01	3.00	101.68	20.89	2.73	22.43	20,559.05
2014 TOTALS (lbs/day unmitigated)	317.87	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90
2014 TOTALS (lbs/day mitigated)	143.09	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90

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Construction Unmitigated Detail Report:

CONSTRUCTION EMISSION ESTIMATES Winter Pounds Per Day, Unmitigated

	ROG	NOx	CO	SO2	PM10 Dust	PM10 Exhaust	PM10	PM2.5 Dust	PM2.5 Exhaust	PM2.5	CO2
Time Slice 7/1/2011-7/1/2011 Active Days: 1	7.56	60.87	35.76	0.00	566.26	3.19	569.46	118.26	2.94	121.20	5,971.73
Mass Grading 07/01/2011-10/31/2012	7.56	60.87	35.76	0.00	566.26	3.19	569.46	118.26	2.94	121.20	5,971.73
Mass Grading Dust	0.00	0.00	0.00	0.00	566.25	0.00	566.25	118.26	0.00	118.26	0.00
Mass Grading Off Road Diesel	7.48	60.72	33.21	0.00	0.00	3.18	3.18	0.00	2.93	2.93	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.08	0.15	2.55	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.55
Time Slice 7/4/2011-12/30/2011 Active Days: 130	10.26	**96.97**	48.98	0.06	**566.45**	**4.59**	**571.04**	**118.32**	**4.22**	**122.55**	11,512.12
Mass Grading 07/01/2011-10/31/2012	7.56	60.87	35.76	0.00	566.26	3.19	569.46	118.26	2.94	121.20	5,971.73
Mass Grading Dust	0.00	0.00	0.00	0.00	566.25	0.00	566.25	118.26	0.00	118.26	0.00
Mass Grading Off Road Diesel	7.48	60.72	33.21	0.00	0.00	3.18	3.18	0.00	2.93	2.93	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.08	0.15	2.55	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.55
Mass Grading 07/02/2011-01/31/2012	2.70	36.11	13.23	0.05	0.18	1.40	1.58	0.06	1.29	1.35	5,540.39
Mass Grading Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Off Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading On Road Diesel	2.70	36.11	13.23	0.05	0.18	1.40	1.58	0.06	1.29	1.35	5,540.39
Mass Grading Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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Time Slice 1/2/2012-1/31/2012 Active Days: 22	9.65	89.36	46.18	0.06	**566.45**	4.15	570.60	**118.32**	3.82	122.14	11,511.78
Mass Grading 07/01/2011-10/31/2012	7.18	57.21	34.33	0.00	566.26	2.93	569.19	118.26	2.69	120.95	5,971.39
Mass Grading Dust	0.00	0.00	0.00	0.00	566.25	0.00	566.25	118.26	0.00	118.26	0.00
Mass Grading Off Road Diesel	7.11	57.08	31.98	0.00	0.00	2.92	2.92	0.00	2.68	2.68	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.07	0.13	2.35	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.22
Mass Grading 07/02/2011-01/31/2012	2.47	32.14	11.85	0.05	0.18	1.22	1.41	0.06	1.13	1.19	5,540.39
Mass Grading Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Off Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading On Road Diesel	2.47	32.14	11.85	0.05	0.18	1.22	1.41	0.06	1.13	1.19	5,540.39
Mass Grading Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Time Slice 2/1/2012-10/31/2012 Active Days: 196	7.18	57.21	34.33	0.00	566.26	2.93	569.19	118.26	2.69	120.95	5,971.39
Mass Grading 07/01/2011-10/31/2012	7.18	57.21	34.33	0.00	566.26	2.93	569.19	118.26	2.69	120.95	5,971.39
Mass Grading Dust	0.00	0.00	0.00	0.00	566.25	0.00	566.25	118.26	0.00	118.26	0.00
Mass Grading Off Road Diesel	7.11	57.08	31.98	0.00	0.00	2.92	2.92	0.00	2.68	2.68	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.07	0.13	2.35	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.22

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Time Slice 11/1/2012-12/31/2012 Active Days: 43	2.72	22.00	12.45	0.00	100.01	1.08	101.08	20.89	0.99	21.88	2,371.00
Fine Grading 11/01/2012-02/28/2013	2.72	22.00	12.45	0.00	100.01	1.08	101.08	20.89	0.99	21.88	2,371.00
Fine Grading Dust	0.00	0.00	0.00	0.00	100.00	0.00	100.00	20.88	0.00	20.88	0.00
Fine Grading Off Road Diesel	2.69	21.95	11.51	0.00	0.00	1.07	1.07	0.00	0.99	0.99	2,247.32
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.03	0.05	0.94	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.69
Time Slice 1/1/2013-2/27/2013 Active Days: 42	2.58	20.61	11.97	0.00	100.01	0.99	101.00	20.89	0.91	21.80	2,370.89
Fine Grading 11/01/2012-02/28/2013	2.58	20.61	11.97	0.00	100.01	0.99	101.00	20.89	0.91	21.80	2,370.89
Fine Grading Dust	0.00	0.00	0.00	0.00	100.00	0.00	100.00	20.88	0.00	20.88	0.00
Fine Grading Off Road Diesel	2.55	20.56	11.10	0.00	0.00	0.99	0.99	0.00	0.91	0.91	2,247.32
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.03	0.05	0.87	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.57
Time Slice 2/28/2013-2/28/2013 Active Days: 1	4.32	34.78	20.80	0.00	100.01	1.67	101.68	20.89	1.54	22.43	4,209.09
Fine Grading 11/01/2012-02/28/2013	2.58	20.61	11.97	0.00	100.01	0.99	101.00	20.89	0.91	21.80	2,370.89
Fine Grading Dust	0.00	0.00	0.00	0.00	100.00	0.00	100.00	20.88	0.00	20.88	0.00
Fine Grading Off Road Diesel	2.55	20.56	11.10	0.00	0.00	0.99	0.99	0.00	0.91	0.91	2,247.32
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.03	0.05	0.87	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.57
Trenching 02/28/2013-02/28/2013	1.74	14.17	8.84	0.00	0.01	0.68	0.69	0.00	0.63	0.63	1,838.21
Trenching Off Road Diesel	1.72	14.12	7.97	0.00	0.00	0.68	0.68	0.00	0.62	0.62	1,714.64
Trenching Worker Trips	0.03	0.05	0.87	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.57

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Time Slice 3/1/2013-10/31/2013 Active Days: 175	8.54	63.67	**96.21**	**0.19**	0.75	3.00	3.75	0.26	2.73	2.99	**20,559.05**
Building 03/01/2013-10/31/2013	8.54	63.67	96.21	0.19	0.75	3.00	3.75	0.26	2.73	2.99	20,559.05
Building Off Road Diesel	2.88	13.91	10.20	0.00	0.00	0.93	0.93	0.00	0.86	0.86	1,621.20
Building Vendor Trips	4.17	46.95	36.28	0.11	0.41	1.84	2.25	0.14	1.69	1.82	11,854.59
Building Worker Trips	1.49	2.82	49.73	0.07	0.34	0.23	0.57	0.12	0.19	0.31	7,083.26
Time Slice 11/1/2013-11/29/2013 Active Days: 21	3.44	16.02	10.91	0.01	0.03	1.21	1.25	0.01	1.12	1.13	1,982.56
Asphalt 11/01/2013-11/30/2013	3.44	16.02	10.91	0.01	0.03	1.21	1.25	0.01	1.12	1.13	1,982.56
Paving Off-Gas	1.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paving Off Road Diesel	2.10	12.84	8.03	0.00	0.00	1.09	1.09	0.00	1.00	1.00	1,131.92
Paving On Road Diesel	0.24	3.09	1.15	0.01	0.02	0.12	0.14	0.01	0.11	0.11	603.51
Paving Worker Trips	0.05	0.10	1.74	0.00	0.01	0.01	0.02	0.00	0.01	0.01	247.14
Time Slice 12/2/2013-12/31/2013 Active Days: 22	**317.88**	0.18	3.22	0.00	0.02	0.01	0.04	0.01	0.01	0.02	458.29
Coating 12/01/2013-01/31/2014	317.88	0.18	3.22	0.00	0.02	0.01	0.04	0.01	0.01	0.02	458.29
Architectural Coating	317.79	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.10	0.18	3.22	0.00	0.02	0.01	0.04	0.01	0.01	0.02	458.29
Time Slice 1/1/2014-1/31/2014 Active Days: 23	317.87	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90
Coating 12/01/2013-01/31/2014	317.87	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90
Architectural Coating	317.79	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.09	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90

Phase Assumptions

Phase: Fine Grading 11/1/2012 - 2/28/2013 - Default Fine Site Grading/Excavation Description

Total Acres Disturbed: 33.32

Maximum Daily Acreage Disturbed: 5

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Fugitive Dust Level of Detail: Default

20 lbs per acre-day

On Road Truck Travel (VMT): 0

Off-Road Equipment:

1 Graders (174 hp) operating at a 0.61 load factor for 6 hours per day

1 Rubber Tired Dozers (357 hp) operating at a 0.59 load factor for 6 hours per day

1 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 7 hours per day

1 Water Trucks (189 hp) operating at a 0.5 load factor for 8 hours per day

Phase: Mass Grading 7/1/2011 - 10/31/2012 - Default Mass Site Grading/Excavation Description

Total Acres Disturbed: 33.32

Maximum Daily Acreage Disturbed: 5

Fugitive Dust Level of Detail: Low

Onsite Cut/Fill: 4375 cubic yards/day; Offsite Cut/Fill: 0 cubic yards/day

On Road Truck Travel (VMT): 0

Off-Road Equipment:

3 Graders (174 hp) operating at a 0.61 load factor for 6 hours per day

3 Rubber Tired Dozers (357 hp) operating at a 0.59 load factor for 6 hours per day

3 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 7 hours per day

1 Water Trucks (189 hp) operating at a 0.5 load factor for 8 hours per day

Phase: Mass Grading 7/2/2011 - 1/31/2012 - Soil Hauling Only

Total Acres Disturbed: 0

Maximum Daily Acreage Disturbed: 0

Fugitive Dust Level of Detail: Low

Onsite Cut/Fill: 0 cubic yards/day; Offsite Cut/Fill: 0 cubic yards/day

On Road Truck Travel (VMT): 1307.19

Off-Road Equipment:

Phase: Trenching 2/28/2013 - 2/28/2013 - Default Trenching Description

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Off-Road Equipment:

2 Excavators (168 hp) operating at a 0.57 load factor for 8 hours per day

1 Other General Industrial Equipment (238 hp) operating at a 0.51 load factor for 8 hours per day

1 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 0 hours per day

Phase: Paving 11/1/2013 - 11/30/2013 - Default Paving Description

Acres to be Paved: 8.33

Off-Road Equipment:

4 Cement and Mortar Mixers (10 hp) operating at a 0.56 load factor for 6 hours per day

1 Pavers (100 hp) operating at a 0.62 load factor for 7 hours per day

2 Paving Equipment (104 hp) operating at a 0.53 load factor for 6 hours per day

1 Rollers (95 hp) operating at a 0.56 load factor for 7 hours per day

Phase: Building Construction 3/1/2013 - 10/31/2013 - Default Building Construction Description

Off-Road Equipment:

1 Cranes (399 hp) operating at a 0.43 load factor for 6 hours per day

2 Forklifts (145 hp) operating at a 0.3 load factor for 6 hours per day

1 Generator Sets (49 hp) operating at a 0.74 load factor for 8 hours per day

1 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 8 hours per day

3 Welders (45 hp) operating at a 0.45 load factor for 8 hours per day

Phase: Architectural Coating 12/1/2013 - 1/31/2014 - Default Architectural Coating Description

Rule: Residential Interior Coatings begins 1/1/2005 ends 6/30/2008 specifies a VOC of 100

Rule: Residential Interior Coatings begins 7/1/2008 ends 12/31/2040 specifies a VOC of 50

Rule: Residential Exterior Coatings begins 1/1/2005 ends 6/30/2008 specifies a VOC of 250

Rule: Residential Exterior Coatings begins 7/1/2008 ends 12/31/2040 specifies a VOC of 100

Rule: Nonresidential Interior Coatings begins 1/1/2005 ends 12/31/2040 specifies a VOC of 250

Rule: Nonresidential Exterior Coatings begins 1/1/2005 ends 12/31/2040 specifies a VOC of 250

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Construction Mitigated Detail Report:

CONSTRUCTION EMISSION ESTIMATES Winter Pounds Per Day, Mitigated

	ROG	NOx	CO	SO2	PM10 Dust	PM10 Exhaust	PM10	PM2.5 Dust	PM2.5 Exhaust	PM2.5	CO2
Time Slice 7/1/2011-7/1/2011 Active Days: 1	7.56	60.87	35.76	0.00	141.58	3.19	144.77	29.57	2.94	32.51	5,971.73
Mass Grading 07/01/2011-10/31/2012	7.56	60.87	35.76	0.00	141.58	3.19	144.77	29.57	2.94	32.51	5,971.73
Mass Grading Dust	0.00	0.00	0.00	0.00	141.56	0.00	141.56	29.56	0.00	29.56	0.00
Mass Grading Off Road Diesel	7.48	60.72	33.21	0.00	0.00	3.18	3.18	0.00	2.93	2.93	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.08	0.15	2.55	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.55
Time Slice 7/4/2011-12/30/2011 Active Days: 130	10.26	**96.97**	48.98	0.06	141.76	**4.59**	146.35	29.63	**4.22**	33.85	11,512.12
Mass Grading 07/01/2011-10/31/2012	7.56	60.87	35.76	0.00	141.58	3.19	144.77	29.57	2.94	32.51	5,971.73
Mass Grading Dust	0.00	0.00	0.00	0.00	141.56	0.00	141.56	29.56	0.00	29.56	0.00
Mass Grading Off Road Diesel	7.48	60.72	33.21	0.00	0.00	3.18	3.18	0.00	2.93	2.93	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.08	0.15	2.55	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.55
Mass Grading 07/02/2011-01/31/2012	2.70	36.11	13.23	0.05	0.18	1.40	1.58	0.06	1.29	1.35	5,540.39
Mass Grading Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Off Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading On Road Diesel	2.70	36.11	13.23	0.05	0.18	1.40	1.58	0.06	1.29	1.35	5,540.39
Mass Grading Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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Time Slice 1/2/2012-1/31/2012 Active Days: 22	9.65	89.36	46.18	0.06	141.76	4.15	145.91	29.63	3.82	33.45	11,511.78
Mass Grading 07/01/2011-10/31/2012	7.18	57.21	34.33	0.00	141.58	2.93	144.50	29.57	2.69	32.26	5,971.39
Mass Grading Dust	0.00	0.00	0.00	0.00	141.56	0.00	141.56	29.56	0.00	29.56	0.00
Mass Grading Off Road Diesel	7.11	57.08	31.98	0.00	0.00	2.92	2.92	0.00	2.68	2.68	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.07	0.13	2.35	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.22
Mass Grading 07/02/2011-01/31/2012	2.47	32.14	11.85	0.05	0.18	1.22	1.41	0.06	1.13	1.19	5,540.39
Mass Grading Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Off Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading On Road Diesel	2.47	32.14	11.85	0.05	0.18	1.22	1.41	0.06	1.13	1.19	5,540.39
Mass Grading Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Time Slice 2/1/2012-10/31/2012 Active Days: 196	7.18	57.21	34.33	0.00	141.58	2.93	144.50	29.57	2.69	32.26	5,971.39
Mass Grading 07/01/2011-10/31/2012	7.18	57.21	34.33	0.00	141.58	2.93	144.50	29.57	2.69	32.26	5,971.39
Mass Grading Dust	0.00	0.00	0.00	0.00	141.56	0.00	141.56	29.56	0.00	29.56	0.00
Mass Grading Off Road Diesel	7.11	57.08	31.98	0.00	0.00	2.92	2.92	0.00	2.68	2.68	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.07	0.13	2.35	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.22

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Time Slice 11/1/2012-12/31/2012 Active Days: 43	2.72	22.00	12.45	0.00	100.01	1.08	101.08	20.89	0.99	21.88	2,371.00
Fine Grading 11/01/2012-02/28/2013	2.72	22.00	12.45	0.00	100.01	1.08	101.08	20.89	0.99	21.88	2,371.00
Fine Grading Dust	0.00	0.00	0.00	0.00	100.00	0.00	100.00	20.88	0.00	20.88	0.00
Fine Grading Off Road Diesel	2.69	21.95	11.51	0.00	0.00	1.07	1.07	0.00	0.99	0.99	2,247.32
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.03	0.05	0.94	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.69
Time Slice 1/1/2013-2/27/2013 Active Days: 42	2.58	20.61	11.97	0.00	100.01	0.99	101.00	20.89	0.91	21.80	2,370.89
Fine Grading 11/01/2012-02/28/2013	2.58	20.61	11.97	0.00	100.01	0.99	101.00	20.89	0.91	21.80	2,370.89
Fine Grading Dust	0.00	0.00	0.00	0.00	100.00	0.00	100.00	20.88	0.00	20.88	0.00
Fine Grading Off Road Diesel	2.55	20.56	11.10	0.00	0.00	0.99	0.99	0.00	0.91	0.91	2,247.32
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.03	0.05	0.87	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.57
Time Slice 2/28/2013-2/28/2013 Active Days: 1	4.32	34.78	20.80	0.00	100.01	1.67	101.68	20.89	1.54	22.43	4,209.09
Fine Grading 11/01/2012-02/28/2013	2.58	20.61	11.97	0.00	100.01	0.99	101.00	20.89	0.91	21.80	2,370.89
Fine Grading Dust	0.00	0.00	0.00	0.00	100.00	0.00	100.00	20.88	0.00	20.88	0.00
Fine Grading Off Road Diesel	2.55	20.56	11.10	0.00	0.00	0.99	0.99	0.00	0.91	0.91	2,247.32
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.03	0.05	0.87	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.57
Trenching 02/28/2013-02/28/2013	1.74	14.17	8.84	0.00	0.01	0.68	0.69	0.00	0.63	0.63	1,838.21
Trenching Off Road Diesel	1.72	14.12	7.97	0.00	0.00	0.68	0.68	0.00	0.62	0.62	1,714.64
Trenching Worker Trips	0.03	0.05	0.87	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.57

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Time Slice 3/1/2013-10/31/2013 Active Days: 175	8.54	63.67	**96.21**	**0.19**	0.75	3.00	3.75	0.26	2.73	2.99	**20,559.05**
Building 03/01/2013-10/31/2013	8.54	63.67	96.21	0.19	0.75	3.00	3.75	0.26	2.73	2.99	20,559.05
Building Off Road Diesel	2.88	13.91	10.20	0.00	0.00	0.93	0.93	0.00	0.86	0.86	1,621.20
Building Vendor Trips	4.17	46.95	36.28	0.11	0.41	1.84	2.25	0.14	1.69	1.82	11,854.59
Building Worker Trips	1.49	2.82	49.73	0.07	0.34	0.23	0.57	0.12	0.19	0.31	7,083.26
Time Slice 11/1/2013-11/29/2013 Active Days: 21	3.44	16.02	10.91	0.01	0.03	1.21	1.25	0.01	1.12	1.13	1,982.56
Asphalt 11/01/2013-11/30/2013	3.44	16.02	10.91	0.01	0.03	1.21	1.25	0.01	1.12	1.13	1,982.56
Paving Off-Gas	1.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paving Off Road Diesel	2.10	12.84	8.03	0.00	0.00	1.09	1.09	0.00	1.00	1.00	1,131.92
Paving On Road Diesel	0.24	3.09	1.15	0.01	0.02	0.12	0.14	0.01	0.11	0.11	603.51
Paving Worker Trips	0.05	0.10	1.74	0.00	0.01	0.01	0.02	0.00	0.01	0.01	247.14
Time Slice 12/2/2013-12/31/2013 Active Days: 22	143.10	0.18	3.22	0.00	0.02	0.01	0.04	0.01	0.01	0.02	458.29
Coating 12/01/2013-01/31/2014	143.10	0.18	3.22	0.00	0.02	0.01	0.04	0.01	0.01	0.02	458.29
Architectural Coating	143.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.10	0.18	3.22	0.00	0.02	0.01	0.04	0.01	0.01	0.02	458.29
Time Slice 1/1/2014-1/31/2014 Active Days: 23	143.09	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90
Coating 12/01/2013-01/31/2014	143.09	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90
Architectural Coating	143.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.09	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90

Construction Related Mitigation Measures

The following mitigation measures apply to Phase: Mass Grading 7/1/2011 - 10/31/2012 - Default Mass Site Grading/Excavation Description

For Soil Stablizing Measures, the Water exposed surfaces 3x daily watering mitigation reduces emissions by:

PM10: 75% PM25: 75%

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For Unpaved Roads Measures, the Manage haul road dust 3x daily watering mitigation reduces emissions by:

PM10: 75% PM25: 75%

The following mitigation measures apply to Phase: Architectural Coating 12/1/2013 - 1/31/2014 - Default Architectural Coating Description

For Residential Architectural Coating Measures, the Residential Exterior: Use Low VOC Coatings mitigation reduces emissions by:

ROG: 10%

For Residential Architectural Coating Measures, the Residential Interior: Use Low VOC Coatings mitigation reduces emissions by:

ROG: 10%

For Nonresidential Architectural Coating Measures, the Nonresidential Exterior: Use Low VOC Coatings mitigation reduces emissions by:

ROG: 10%

For Nonresidential Architectural Coating Measures, the Nonresidential Interior: Use Low VOC Coatings mitigation reduces emissions by:

ROG: 10%

ATTACHMENT B

URBEMIS Output for 10.25 Mile Round Trip Hauling Distance – 219 Truck Trips

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Urbemis 2007 Version 9.2.4

Combined Winter Emissions Reports (Pounds/Day)

File Name: R:\General Air Quality Info\Projects\0D2133100 - Palm-Industrial Distribution Center Project EIR\Modeling\Modeling Revisions November 2012\1025 mile 219 trucks.urb924

Project Name: Palm Industrial - Revised November 2012 - 10.25 mile Haul Truck Round Trip - 219 trucks - Mitigated

Project Location: San Bernadino County

On-Road Vehicle Emissions Based on: Version : Emfac2007 V2.3 Nov 1 2006

Off-Road Vehicle Emissions Based on: OFFROAD2007

Summary Report:

CONSTRUCTION EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10 Dust	PM10 Exhaust	PM10	PM2.5 Dust	PM2.5 Exhaust	PM2.5	CO2
2011 TOTALS (lbs/day unmitigated)	12.31	124.37	59.02	0.09	566.59	5.65	572.24	118.37	5.20	123.57	15,716.14
2011 TOTALS (lbs/day mitigated)	12.31	124.37	59.02	0.09	141.90	5.65	147.56	29.68	5.20	34.88	15,716.14
2012 TOTALS (lbs/day unmitigated)	11.53	113.75	55.17	0.09	566.59	5.08	571.67	118.37	4.67	123.04	15,715.80
2012 TOTALS (lbs/day mitigated)	11.53	113.75	55.17	0.09	141.90	5.08	146.98	29.68	4.67	34.35	15,715.80
2013 TOTALS (lbs/day unmitigated)	317.88	63.67	96.21	0.19	100.01	3.00	101.68	20.89	2.73	22.43	20,559.05
2013 TOTALS (lbs/day mitigated)	143.10	63.67	96.21	0.19	100.01	3.00	101.68	20.89	2.73	22.43	20,559.05
2014 TOTALS (lbs/day unmitigated)	317.87	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90
2014 TOTALS (lbs/day mitigated)	143.09	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90

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Construction Unmitigated Detail Report:

CONSTRUCTION EMISSION ESTIMATES Winter Pounds Per Day, Unmitigated

	ROG	NOx	CO	SO2	PM10 Dust	PM10 Exhaust	PM10	PM2.5 Dust	PM2.5 Exhaust	PM2.5	CO2
Time Slice 7/1/2011-7/1/2011 Active Days: 1	7.56	60.87	35.76	0.00	566.26	3.19	569.46	118.26	2.94	121.20	5,971.73
Mass Grading 07/01/2011-10/31/2012	7.56	60.87	35.76	0.00	566.26	3.19	569.46	118.26	2.94	121.20	5,971.73
Mass Grading Dust	0.00	0.00	0.00	0.00	566.25	0.00	566.25	118.26	0.00	118.26	0.00
Mass Grading Off Road Diesel	7.48	60.72	33.21	0.00	0.00	3.18	3.18	0.00	2.93	2.93	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.08	0.15	2.55	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.55
Time Slice 7/4/2011-12/30/2011 Active Days: 130	12.31	**124.37**	59.02	0.09	**566.59**	**5.65**	**572.24**	**118.37**	**5.20**	**123.57**	15,716.14
Mass Grading 07/01/2011-10/31/2012	7.56	60.87	35.76	0.00	566.26	3.19	569.46	118.26	2.94	121.20	5,971.73
Mass Grading Dust	0.00	0.00	0.00	0.00	566.25	0.00	566.25	118.26	0.00	118.26	0.00
Mass Grading Off Road Diesel	7.48	60.72	33.21	0.00	0.00	3.18	3.18	0.00	2.93	2.93	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.08	0.15	2.55	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.55
Mass Grading 07/02/2011-01/31/2012	4.75	63.50	23.26	0.09	0.32	2.46	2.79	0.11	2.26	2.37	9,744.41
Mass Grading Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Off Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading On Road Diesel	4.75	63.50	23.26	0.09	0.32	2.46	2.79	0.11	2.26	2.37	9,744.41
Mass Grading Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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Time Slice 1/2/2012-1/31/2012 Active Days: 22	11.53	113.75	55.17	0.09	**566.59**	5.08	571.67	**118.37**	4.67	123.04	15,715.80
Mass Grading 07/01/2011-10/31/2012	7.18	57.21	34.33	0.00	566.26	2.93	569.19	118.26	2.69	120.95	5,971.39
Mass Grading Dust	0.00	0.00	0.00	0.00	566.25	0.00	566.25	118.26	0.00	118.26	0.00
Mass Grading Off Road Diesel	7.11	57.08	31.98	0.00	0.00	2.92	2.92	0.00	2.68	2.68	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.07	0.13	2.35	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.22
Mass Grading 07/02/2011-01/31/2012	4.35	56.54	20.84	0.09	0.32	2.15	2.48	0.11	1.98	2.09	9,744.41
Mass Grading Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Off Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading On Road Diesel	4.35	56.54	20.84	0.09	0.32	2.15	2.48	0.11	1.98	2.09	9,744.41
Mass Grading Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Time Slice 2/1/2012-10/31/2012 Active Days: 196	7.18	57.21	34.33	0.00	566.26	2.93	569.19	118.26	2.69	120.95	5,971.39
Mass Grading 07/01/2011-10/31/2012	7.18	57.21	34.33	0.00	566.26	2.93	569.19	118.26	2.69	120.95	5,971.39
Mass Grading Dust	0.00	0.00	0.00	0.00	566.25	0.00	566.25	118.26	0.00	118.26	0.00
Mass Grading Off Road Diesel	7.11	57.08	31.98	0.00	0.00	2.92	2.92	0.00	2.68	2.68	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.07	0.13	2.35	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.22

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Time Slice 11/1/2012-12/31/2012 Active Days: 43	2.72	22.00	12.45	0.00	100.01	1.08	101.08	20.89	0.99	21.88	2,371.00
Fine Grading 11/01/2012-02/28/2013	2.72	22.00	12.45	0.00	100.01	1.08	101.08	20.89	0.99	21.88	2,371.00
Fine Grading Dust	0.00	0.00	0.00	0.00	100.00	0.00	100.00	20.88	0.00	20.88	0.00
Fine Grading Off Road Diesel	2.69	21.95	11.51	0.00	0.00	1.07	1.07	0.00	0.99	0.99	2,247.32
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.03	0.05	0.94	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.69
Time Slice 1/1/2013-2/27/2013 Active Days: 42	2.58	20.61	11.97	0.00	100.01	0.99	101.00	20.89	0.91	21.80	2,370.89
Fine Grading 11/01/2012-02/28/2013	2.58	20.61	11.97	0.00	100.01	0.99	101.00	20.89	0.91	21.80	2,370.89
Fine Grading Dust	0.00	0.00	0.00	0.00	100.00	0.00	100.00	20.88	0.00	20.88	0.00
Fine Grading Off Road Diesel	2.55	20.56	11.10	0.00	0.00	0.99	0.99	0.00	0.91	0.91	2,247.32
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.03	0.05	0.87	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.57
Time Slice 2/28/2013-2/28/2013 Active Days: 1	4.32	34.78	20.80	0.00	100.01	1.67	101.68	20.89	1.54	22.43	4,209.09
Fine Grading 11/01/2012-02/28/2013	2.58	20.61	11.97	0.00	100.01	0.99	101.00	20.89	0.91	21.80	2,370.89
Fine Grading Dust	0.00	0.00	0.00	0.00	100.00	0.00	100.00	20.88	0.00	20.88	0.00
Fine Grading Off Road Diesel	2.55	20.56	11.10	0.00	0.00	0.99	0.99	0.00	0.91	0.91	2,247.32
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.03	0.05	0.87	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.57
Trenching 02/28/2013-02/28/2013	1.74	14.17	8.84	0.00	0.01	0.68	0.69	0.00	0.63	0.63	1,838.21
Trenching Off Road Diesel	1.72	14.12	7.97	0.00	0.00	0.68	0.68	0.00	0.62	0.62	1,714.64
Trenching Worker Trips	0.03	0.05	0.87	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.57

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Time Slice 3/1/2013-10/31/2013 Active Days: 175	8.54	63.67	**96.21**	**0.19**	0.75	3.00	3.75	0.26	2.73	2.99	**20,559.05**
Building 03/01/2013-10/31/2013	8.54	63.67	96.21	0.19	0.75	3.00	3.75	0.26	2.73	2.99	20,559.05
Building Off Road Diesel	2.88	13.91	10.20	0.00	0.00	0.93	0.93	0.00	0.86	0.86	1,621.20
Building Vendor Trips	4.17	46.95	36.28	0.11	0.41	1.84	2.25	0.14	1.69	1.82	11,854.59
Building Worker Trips	1.49	2.82	49.73	0.07	0.34	0.23	0.57	0.12	0.19	0.31	7,083.26
Time Slice 11/1/2013-11/29/2013 Active Days: 21	3.44	16.02	10.91	0.01	0.03	1.21	1.25	0.01	1.12	1.13	1,982.56
Asphalt 11/01/2013-11/30/2013	3.44	16.02	10.91	0.01	0.03	1.21	1.25	0.01	1.12	1.13	1,982.56
Paving Off-Gas	1.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paving Off Road Diesel	2.10	12.84	8.03	0.00	0.00	1.09	1.09	0.00	1.00	1.00	1,131.92
Paving On Road Diesel	0.24	3.09	1.15	0.01	0.02	0.12	0.14	0.01	0.11	0.11	603.51
Paving Worker Trips	0.05	0.10	1.74	0.00	0.01	0.01	0.02	0.00	0.01	0.01	247.14
Time Slice 12/2/2013-12/31/2013 Active Days: 22	**317.88**	0.18	3.22	0.00	0.02	0.01	0.04	0.01	0.01	0.02	458.29
Coating 12/01/2013-01/31/2014	317.88	0.18	3.22	0.00	0.02	0.01	0.04	0.01	0.01	0.02	458.29
Architectural Coating	317.79	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.10	0.18	3.22	0.00	0.02	0.01	0.04	0.01	0.01	0.02	458.29
Time Slice 1/1/2014-1/31/2014 Active Days: 23	317.87	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90
Coating 12/01/2013-01/31/2014	317.87	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90
Architectural Coating	317.79	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.09	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90

Phase Assumptions

Phase: Fine Grading 11/1/2012 - 2/28/2013 - Default Fine Site Grading/Excavation Description

Total Acres Disturbed: 33.32

Maximum Daily Acreage Disturbed: 5

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Fugitive Dust Level of Detail: Default

20 lbs per acre-day

On Road Truck Travel (VMT): 0

Off-Road Equipment:

1 Graders (174 hp) operating at a 0.61 load factor for 6 hours per day

1 Rubber Tired Dozers (357 hp) operating at a 0.59 load factor for 6 hours per day

1 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 7 hours per day

1 Water Trucks (189 hp) operating at a 0.5 load factor for 8 hours per day

Phase: Mass Grading 7/1/2011 - 10/31/2012 - Default Mass Site Grading/Excavation Description

Total Acres Disturbed: 33.32

Maximum Daily Acreage Disturbed: 5

Fugitive Dust Level of Detail: Low

Onsite Cut/Fill: 4375 cubic yards/day; Offsite Cut/Fill: 0 cubic yards/day

On Road Truck Travel (VMT): 0

Off-Road Equipment:

3 Graders (174 hp) operating at a 0.61 load factor for 6 hours per day

3 Rubber Tired Dozers (357 hp) operating at a 0.59 load factor for 6 hours per day

3 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 7 hours per day

1 Water Trucks (189 hp) operating at a 0.5 load factor for 8 hours per day

Phase: Mass Grading 7/2/2011 - 1/31/2012 - Soil Hauling Only

Total Acres Disturbed: 0

Maximum Daily Acreage Disturbed: 0

Fugitive Dust Level of Detail: Low

Onsite Cut/Fill: 0 cubic yards/day; Offsite Cut/Fill: 0 cubic yards/day

On Road Truck Travel (VMT): 2299.08

Off-Road Equipment:

Phase: Trenching 2/28/2013 - 2/28/2013 - Default Trenching Description

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Off-Road Equipment:

2 Excavators (168 hp) operating at a 0.57 load factor for 8 hours per day

1 Other General Industrial Equipment (238 hp) operating at a 0.51 load factor for 8 hours per day

1 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 0 hours per day

Phase: Paving 11/1/2013 - 11/30/2013 - Default Paving Description

Acres to be Paved: 8.33

Off-Road Equipment:

4 Cement and Mortar Mixers (10 hp) operating at a 0.56 load factor for 6 hours per day

1 Pavers (100 hp) operating at a 0.62 load factor for 7 hours per day

2 Paving Equipment (104 hp) operating at a 0.53 load factor for 6 hours per day

1 Rollers (95 hp) operating at a 0.56 load factor for 7 hours per day

Phase: Building Construction 3/1/2013 - 10/31/2013 - Default Building Construction Description

Off-Road Equipment:

1 Cranes (399 hp) operating at a 0.43 load factor for 6 hours per day

2 Forklifts (145 hp) operating at a 0.3 load factor for 6 hours per day

1 Generator Sets (49 hp) operating at a 0.74 load factor for 8 hours per day

1 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 8 hours per day

3 Welders (45 hp) operating at a 0.45 load factor for 8 hours per day

Phase: Architectural Coating 12/1/2013 - 1/31/2014 - Default Architectural Coating Description

Rule: Residential Interior Coatings begins 1/1/2005 ends 6/30/2008 specifies a VOC of 100

Rule: Residential Interior Coatings begins 7/1/2008 ends 12/31/2040 specifies a VOC of 50

Rule: Residential Exterior Coatings begins 1/1/2005 ends 6/30/2008 specifies a VOC of 250

Rule: Residential Exterior Coatings begins 7/1/2008 ends 12/31/2040 specifies a VOC of 100

Rule: Nonresidential Interior Coatings begins 1/1/2005 ends 12/31/2040 specifies a VOC of 250

Rule: Nonresidential Exterior Coatings begins 1/1/2005 ends 12/31/2040 specifies a VOC of 250

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Construction Mitigated Detail Report:

CONSTRUCTION EMISSION ESTIMATES Winter Pounds Per Day, Mitigated

	ROG	NOx	CO	SO2	PM10 Dust	PM10 Exhaust	PM10	PM2.5 Dust	PM2.5 Exhaust	PM2.5	CO2
Time Slice 7/1/2011-7/1/2011 Active Days: 1	7.56	60.87	35.76	0.00	141.58	3.19	144.77	29.57	2.94	32.51	5,971.73
Mass Grading 07/01/2011-10/31/2012	7.56	60.87	35.76	0.00	141.58	3.19	144.77	29.57	2.94	32.51	5,971.73
Mass Grading Dust	0.00	0.00	0.00	0.00	141.56	0.00	141.56	29.56	0.00	29.56	0.00
Mass Grading Off Road Diesel	7.48	60.72	33.21	0.00	0.00	3.18	3.18	0.00	2.93	2.93	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.08	0.15	2.55	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.55
Time Slice 7/4/2011-12/30/2011 Active Days: 130	12.31	**124.37**	59.02	0.09	141.90	**5.65**	147.56	29.68	**5.20**	34.88	15,716.14
Mass Grading 07/01/2011-10/31/2012	7.56	60.87	35.76	0.00	141.58	3.19	144.77	29.57	2.94	32.51	5,971.73
Mass Grading Dust	0.00	0.00	0.00	0.00	141.56	0.00	141.56	29.56	0.00	29.56	0.00
Mass Grading Off Road Diesel	7.48	60.72	33.21	0.00	0.00	3.18	3.18	0.00	2.93	2.93	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.08	0.15	2.55	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.55
Mass Grading 07/02/2011-01/31/2012	4.75	63.50	23.26	0.09	0.32	2.46	2.79	0.11	2.26	2.37	9,744.41
Mass Grading Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Off Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading On Road Diesel	4.75	63.50	23.26	0.09	0.32	2.46	2.79	0.11	2.26	2.37	9,744.41
Mass Grading Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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Time Slice 1/2/2012-1/31/2012 Active Days: 22	11.53	113.75	55.17	0.09	141.90	5.08	146.98	29.68	4.67	34.35	15,715.80
Mass Grading 07/01/2011-10/31/2012	7.18	57.21	34.33	0.00	141.58	2.93	144.50	29.57	2.69	32.26	5,971.39
Mass Grading Dust	0.00	0.00	0.00	0.00	141.56	0.00	141.56	29.56	0.00	29.56	0.00
Mass Grading Off Road Diesel	7.11	57.08	31.98	0.00	0.00	2.92	2.92	0.00	2.68	2.68	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.07	0.13	2.35	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.22
Mass Grading 07/02/2011-01/31/2012	4.35	56.54	20.84	0.09	0.32	2.15	2.48	0.11	1.98	2.09	9,744.41
Mass Grading Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Off Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading On Road Diesel	4.35	56.54	20.84	0.09	0.32	2.15	2.48	0.11	1.98	2.09	9,744.41
Mass Grading Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Time Slice 2/1/2012-10/31/2012 Active Days: 196	7.18	57.21	34.33	0.00	141.58	2.93	144.50	29.57	2.69	32.26	5,971.39
Mass Grading 07/01/2011-10/31/2012	7.18	57.21	34.33	0.00	141.58	2.93	144.50	29.57	2.69	32.26	5,971.39
Mass Grading Dust	0.00	0.00	0.00	0.00	141.56	0.00	141.56	29.56	0.00	29.56	0.00
Mass Grading Off Road Diesel	7.11	57.08	31.98	0.00	0.00	2.92	2.92	0.00	2.68	2.68	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.07	0.13	2.35	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.22

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Time Slice 11/1/2012-12/31/2012 Active Days: 43	2.72	22.00	12.45	0.00	100.01	1.08	101.08	20.89	0.99	21.88	2,371.00
Fine Grading 11/01/2012-02/28/2013	2.72	22.00	12.45	0.00	100.01	1.08	101.08	20.89	0.99	21.88	2,371.00
Fine Grading Dust	0.00	0.00	0.00	0.00	100.00	0.00	100.00	20.88	0.00	20.88	0.00
Fine Grading Off Road Diesel	2.69	21.95	11.51	0.00	0.00	1.07	1.07	0.00	0.99	0.99	2,247.32
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.03	0.05	0.94	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.69
Time Slice 1/1/2013-2/27/2013 Active Days: 42	2.58	20.61	11.97	0.00	100.01	0.99	101.00	20.89	0.91	21.80	2,370.89
Fine Grading 11/01/2012-02/28/2013	2.58	20.61	11.97	0.00	100.01	0.99	101.00	20.89	0.91	21.80	2,370.89
Fine Grading Dust	0.00	0.00	0.00	0.00	100.00	0.00	100.00	20.88	0.00	20.88	0.00
Fine Grading Off Road Diesel	2.55	20.56	11.10	0.00	0.00	0.99	0.99	0.00	0.91	0.91	2,247.32
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.03	0.05	0.87	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.57
Time Slice 2/28/2013-2/28/2013 Active Days: 1	4.32	34.78	20.80	0.00	100.01	1.67	101.68	20.89	1.54	22.43	4,209.09
Fine Grading 11/01/2012-02/28/2013	2.58	20.61	11.97	0.00	100.01	0.99	101.00	20.89	0.91	21.80	2,370.89
Fine Grading Dust	0.00	0.00	0.00	0.00	100.00	0.00	100.00	20.88	0.00	20.88	0.00
Fine Grading Off Road Diesel	2.55	20.56	11.10	0.00	0.00	0.99	0.99	0.00	0.91	0.91	2,247.32
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.03	0.05	0.87	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.57
Trenching 02/28/2013-02/28/2013	1.74	14.17	8.84	0.00	0.01	0.68	0.69	0.00	0.63	0.63	1,838.21
Trenching Off Road Diesel	1.72	14.12	7.97	0.00	0.00	0.68	0.68	0.00	0.62	0.62	1,714.64
Trenching Worker Trips	0.03	0.05	0.87	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.57

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Time Slice 3/1/2013-10/31/2013 Active Days: 175	8.54	63.67	**96.21**	**0.19**	0.75	3.00	3.75	0.26	2.73	2.99	**20,559.05**
Building 03/01/2013-10/31/2013	8.54	63.67	96.21	0.19	0.75	3.00	3.75	0.26	2.73	2.99	20,559.05
Building Off Road Diesel	2.88	13.91	10.20	0.00	0.00	0.93	0.93	0.00	0.86	0.86	1,621.20
Building Vendor Trips	4.17	46.95	36.28	0.11	0.41	1.84	2.25	0.14	1.69	1.82	11,854.59
Building Worker Trips	1.49	2.82	49.73	0.07	0.34	0.23	0.57	0.12	0.19	0.31	7,083.26
Time Slice 11/1/2013-11/29/2013 Active Days: 21	3.44	16.02	10.91	0.01	0.03	1.21	1.25	0.01	1.12	1.13	1,982.56
Asphalt 11/01/2013-11/30/2013	3.44	16.02	10.91	0.01	0.03	1.21	1.25	0.01	1.12	1.13	1,982.56
Paving Off-Gas	1.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paving Off Road Diesel	2.10	12.84	8.03	0.00	0.00	1.09	1.09	0.00	1.00	1.00	1,131.92
Paving On Road Diesel	0.24	3.09	1.15	0.01	0.02	0.12	0.14	0.01	0.11	0.11	603.51
Paving Worker Trips	0.05	0.10	1.74	0.00	0.01	0.01	0.02	0.00	0.01	0.01	247.14
Time Slice 12/2/2013-12/31/2013 Active Days: 22	143.10	0.18	3.22	0.00	0.02	0.01	0.04	0.01	0.01	0.02	458.29
Coating 12/01/2013-01/31/2014	143.10	0.18	3.22	0.00	0.02	0.01	0.04	0.01	0.01	0.02	458.29
Architectural Coating	143.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.10	0.18	3.22	0.00	0.02	0.01	0.04	0.01	0.01	0.02	458.29
Time Slice 1/1/2014-1/31/2014 Active Days: 23	143.09	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90
Coating 12/01/2013-01/31/2014	143.09	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90
Architectural Coating	143.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.09	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90

Construction Related Mitigation Measures

The following mitigation measures apply to Phase: Mass Grading 7/1/2011 - 10/31/2012 - Default Mass Site Grading/Excavation Description

For Soil Stablizing Measures, the Water exposed surfaces 3x daily watering mitigation reduces emissions by:

PM10: 75% PM25: 75%

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For Unpaved Roads Measures, the Manage haul road dust 3x daily watering mitigation reduces emissions by:

PM10: 75% PM25: 75%

The following mitigation measures apply to Phase: Architectural Coating 12/1/2013 - 1/31/2014 - Default Architectural Coating Description

For Residential Architectural Coating Measures, the Residential Exterior: Use Low VOC Coatings mitigation reduces emissions by:

ROG: 10%

For Residential Architectural Coating Measures, the Residential Interior: Use Low VOC Coatings mitigation reduces emissions by:

ROG: 10%

For Nonresidential Architectural Coating Measures, the Nonresidential Exterior: Use Low VOC Coatings mitigation reduces emissions by:

ROG: 10%

For Nonresidential Architectural Coating Measures, the Nonresidential Interior: Use Low VOC Coatings mitigation reduces emissions by:

ROG: 10%

ATTACHMENT C

URBEMIS Output for 10.25 Mile Round Trip Hauling Distance – 134 Truck Trips

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Urbemis 2007 Version 9.2.4

Combined Winter Emissions Reports (Pounds/Day)

File Name: R:\General Air Quality Info\Projects\0D2133100 - Palm-Industrial Distribution Center Project EIR\Modeling\Modeling Revisions November 2012\1025 mile Rouhd Trip Haul Distance.urb924

Project Name: Palm Industrial - Revised November 2012 - 10.25 mile Haul Truck Round Trip - Mitigated

Project Location: San Bernadino County

On-Road Vehicle Emissions Based on: Version : Emfac2007 V2.3 Nov 1 2006

Off-Road Vehicle Emissions Based on: OFFROAD2007

Summary Report:

CONSTRUCTION EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10 Dust	PM10 Exhaust	PM10	PM2.5 Dust	PM2.5 Exhaust	PM2.5	CO2
2011 TOTALS (lbs/day unmitigated)	10.47	99.75	50.00	0.06	566.46	4.70	571.16	118.33	4.32	122.65	11,938.30
2011 TOTALS (lbs/day mitigated)	10.47	99.75	50.00	0.06	141.78	4.70	146.48	29.63	4.32	33.96	11,938.30
2012 TOTALS (lbs/day unmitigated)	9.84	91.83	47.09	0.06	566.46	4.24	570.71	118.33	3.90	122.23	11,937.97
2012 TOTALS (lbs/day mitigated)	9.84	91.83	47.09	0.06	141.78	4.24	146.02	29.63	3.90	33.54	11,937.97
2013 TOTALS (lbs/day unmitigated)	317.88	63.67	96.21	0.19	100.01	3.00	101.68	20.89	2.73	22.43	20,559.05
2013 TOTALS (lbs/day mitigated)	143.10	63.67	96.21	0.19	100.01	3.00	101.68	20.89	2.73	22.43	20,559.05
2014 TOTALS (lbs/day unmitigated)	317.87	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90
2014 TOTALS (lbs/day mitigated)	143.09	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90

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Construction Unmitigated Detail Report:

CONSTRUCTION EMISSION ESTIMATES Winter Pounds Per Day, Unmitigated

	ROG	NOx	CO	SO2	PM10 Dust	PM10 Exhaust	PM10	PM2.5 Dust	PM2.5 Exhaust	PM2.5	CO2
Time Slice 7/1/2011-7/1/2011 Active Days: 1	7.56	60.87	35.76	0.00	566.26	3.19	569.46	118.26	2.94	121.20	5,971.73
Mass Grading 07/01/2011-10/31/2012	7.56	60.87	35.76	0.00	566.26	3.19	569.46	118.26	2.94	121.20	5,971.73
Mass Grading Dust	0.00	0.00	0.00	0.00	566.25	0.00	566.25	118.26	0.00	118.26	0.00
Mass Grading Off Road Diesel	7.48	60.72	33.21	0.00	0.00	3.18	3.18	0.00	2.93	2.93	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.08	0.15	2.55	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.55
Time Slice 7/4/2011-12/30/2011 Active Days: 130	10.47	**99.75**	50.00	0.06	**566.46**	**4.70**	**571.16**	**118.33**	**4.32**	**122.65**	11,938.30
Mass Grading 07/01/2011-10/31/2012	7.56	60.87	35.76	0.00	566.26	3.19	569.46	118.26	2.94	121.20	5,971.73
Mass Grading Dust	0.00	0.00	0.00	0.00	566.25	0.00	566.25	118.26	0.00	118.26	0.00
Mass Grading Off Road Diesel	7.48	60.72	33.21	0.00	0.00	3.18	3.18	0.00	2.93	2.93	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.08	0.15	2.55	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.55
Mass Grading 07/02/2011-01/31/2012	2.91	38.88	14.24	0.06	0.20	1.51	1.71	0.07	1.39	1.45	5,966.58
Mass Grading Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Off Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading On Road Diesel	2.91	38.88	14.24	0.06	0.20	1.51	1.71	0.07	1.39	1.45	5,966.58
Mass Grading Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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Time Slice 1/2/2012-1/31/2012 Active Days: 22	9.84	91.83	47.09	0.06	**566.46**	4.24	570.71	**118.33**	3.90	122.23	11,937.97
Mass Grading 07/01/2011-10/31/2012	7.18	57.21	34.33	0.00	566.26	2.93	569.19	118.26	2.69	120.95	5,971.39
Mass Grading Dust	0.00	0.00	0.00	0.00	566.25	0.00	566.25	118.26	0.00	118.26	0.00
Mass Grading Off Road Diesel	7.11	57.08	31.98	0.00	0.00	2.92	2.92	0.00	2.68	2.68	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.07	0.13	2.35	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.22
Mass Grading 07/02/2011-01/31/2012	2.66	34.62	12.76	0.06	0.20	1.32	1.52	0.07	1.21	1.28	5,966.58
Mass Grading Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Off Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading On Road Diesel	2.66	34.62	12.76	0.06	0.20	1.32	1.52	0.07	1.21	1.28	5,966.58
Mass Grading Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Time Slice 2/1/2012-10/31/2012 Active Days: 196	7.18	57.21	34.33	0.00	566.26	2.93	569.19	118.26	2.69	120.95	5,971.39
Mass Grading 07/01/2011-10/31/2012	7.18	57.21	34.33	0.00	566.26	2.93	569.19	118.26	2.69	120.95	5,971.39
Mass Grading Dust	0.00	0.00	0.00	0.00	566.25	0.00	566.25	118.26	0.00	118.26	0.00
Mass Grading Off Road Diesel	7.11	57.08	31.98	0.00	0.00	2.92	2.92	0.00	2.68	2.68	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.07	0.13	2.35	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.22

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Time Slice 11/1/2012-12/31/2012 Active Days: 43	2.72	22.00	12.45	0.00	100.01	1.08	101.08	20.89	0.99	21.88	2,371.00
Fine Grading 11/01/2012-02/28/2013	2.72	22.00	12.45	0.00	100.01	1.08	101.08	20.89	0.99	21.88	2,371.00
Fine Grading Dust	0.00	0.00	0.00	0.00	100.00	0.00	100.00	20.88	0.00	20.88	0.00
Fine Grading Off Road Diesel	2.69	21.95	11.51	0.00	0.00	1.07	1.07	0.00	0.99	0.99	2,247.32
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.03	0.05	0.94	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.69
Time Slice 1/1/2013-2/27/2013 Active Days: 42	2.58	20.61	11.97	0.00	100.01	0.99	101.00	20.89	0.91	21.80	2,370.89
Fine Grading 11/01/2012-02/28/2013	2.58	20.61	11.97	0.00	100.01	0.99	101.00	20.89	0.91	21.80	2,370.89
Fine Grading Dust	0.00	0.00	0.00	0.00	100.00	0.00	100.00	20.88	0.00	20.88	0.00
Fine Grading Off Road Diesel	2.55	20.56	11.10	0.00	0.00	0.99	0.99	0.00	0.91	0.91	2,247.32
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.03	0.05	0.87	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.57
Time Slice 2/28/2013-2/28/2013 Active Days: 1	4.32	34.78	20.80	0.00	100.01	1.67	101.68	20.89	1.54	22.43	4,209.09
Fine Grading 11/01/2012-02/28/2013	2.58	20.61	11.97	0.00	100.01	0.99	101.00	20.89	0.91	21.80	2,370.89
Fine Grading Dust	0.00	0.00	0.00	0.00	100.00	0.00	100.00	20.88	0.00	20.88	0.00
Fine Grading Off Road Diesel	2.55	20.56	11.10	0.00	0.00	0.99	0.99	0.00	0.91	0.91	2,247.32
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.03	0.05	0.87	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.57
Trenching 02/28/2013-02/28/2013	1.74	14.17	8.84	0.00	0.01	0.68	0.69	0.00	0.63	0.63	1,838.21
Trenching Off Road Diesel	1.72	14.12	7.97	0.00	0.00	0.68	0.68	0.00	0.62	0.62	1,714.64
Trenching Worker Trips	0.03	0.05	0.87	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.57

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Time Slice 3/1/2013-10/31/2013 Active Days: 175	8.54	63.67	**96.21**	**0.19**	0.75	3.00	3.75	0.26	2.73	2.99	**20,559.05**
Building 03/01/2013-10/31/2013	8.54	63.67	96.21	0.19	0.75	3.00	3.75	0.26	2.73	2.99	20,559.05
Building Off Road Diesel	2.88	13.91	10.20	0.00	0.00	0.93	0.93	0.00	0.86	0.86	1,621.20
Building Vendor Trips	4.17	46.95	36.28	0.11	0.41	1.84	2.25	0.14	1.69	1.82	11,854.59
Building Worker Trips	1.49	2.82	49.73	0.07	0.34	0.23	0.57	0.12	0.19	0.31	7,083.26
Time Slice 11/1/2013-11/29/2013 Active Days: 21	3.44	16.02	10.91	0.01	0.03	1.21	1.25	0.01	1.12	1.13	1,982.56
Asphalt 11/01/2013-11/30/2013	3.44	16.02	10.91	0.01	0.03	1.21	1.25	0.01	1.12	1.13	1,982.56
Paving Off-Gas	1.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paving Off Road Diesel	2.10	12.84	8.03	0.00	0.00	1.09	1.09	0.00	1.00	1.00	1,131.92
Paving On Road Diesel	0.24	3.09	1.15	0.01	0.02	0.12	0.14	0.01	0.11	0.11	603.51
Paving Worker Trips	0.05	0.10	1.74	0.00	0.01	0.01	0.02	0.00	0.01	0.01	247.14
Time Slice 12/2/2013-12/31/2013 Active Days: 22	**317.88**	0.18	3.22	0.00	0.02	0.01	0.04	0.01	0.01	0.02	458.29
Coating 12/01/2013-01/31/2014	317.88	0.18	3.22	0.00	0.02	0.01	0.04	0.01	0.01	0.02	458.29
Architectural Coating	317.79	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.10	0.18	3.22	0.00	0.02	0.01	0.04	0.01	0.01	0.02	458.29
Time Slice 1/1/2014-1/31/2014 Active Days: 23	317.87	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90
Coating 12/01/2013-01/31/2014	317.87	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90
Architectural Coating	317.79	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.09	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90

Phase Assumptions

Phase: Fine Grading 11/1/2012 - 2/28/2013 - Default Fine Site Grading/Excavation Description

Total Acres Disturbed: 33.32

Maximum Daily Acreage Disturbed: 5

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Fugitive Dust Level of Detail: Default

20 lbs per acre-day

On Road Truck Travel (VMT): 0

Off-Road Equipment:

1 Graders (174 hp) operating at a 0.61 load factor for 6 hours per day

1 Rubber Tired Dozers (357 hp) operating at a 0.59 load factor for 6 hours per day

1 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 7 hours per day

1 Water Trucks (189 hp) operating at a 0.5 load factor for 8 hours per day

Phase: Mass Grading 7/1/2011 - 10/31/2012 - Default Mass Site Grading/Excavation Description

Total Acres Disturbed: 33.32

Maximum Daily Acreage Disturbed: 5

Fugitive Dust Level of Detail: Low

Onsite Cut/Fill: 4375 cubic yards/day; Offsite Cut/Fill: 0 cubic yards/day

On Road Truck Travel (VMT): 0

Off-Road Equipment:

3 Graders (174 hp) operating at a 0.61 load factor for 6 hours per day

3 Rubber Tired Dozers (357 hp) operating at a 0.59 load factor for 6 hours per day

3 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 7 hours per day

1 Water Trucks (189 hp) operating at a 0.5 load factor for 8 hours per day

Phase: Mass Grading 7/2/2011 - 1/31/2012 - Soil Hauling Only

Total Acres Disturbed: 0

Maximum Daily Acreage Disturbed: 0

Fugitive Dust Level of Detail: Low

Onsite Cut/Fill: 0 cubic yards/day; Offsite Cut/Fill: 0 cubic yards/day

On Road Truck Travel (VMT): 1407.74

Off-Road Equipment:

Phase: Trenching 2/28/2013 - 2/28/2013 - Default Trenching Description

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Off-Road Equipment:

2 Excavators (168 hp) operating at a 0.57 load factor for 8 hours per day

1 Other General Industrial Equipment (238 hp) operating at a 0.51 load factor for 8 hours per day

1 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 0 hours per day

Phase: Paving 11/1/2013 - 11/30/2013 - Default Paving Description

Acres to be Paved: 8.33

Off-Road Equipment:

4 Cement and Mortar Mixers (10 hp) operating at a 0.56 load factor for 6 hours per day

1 Pavers (100 hp) operating at a 0.62 load factor for 7 hours per day

2 Paving Equipment (104 hp) operating at a 0.53 load factor for 6 hours per day

1 Rollers (95 hp) operating at a 0.56 load factor for 7 hours per day

Phase: Building Construction 3/1/2013 - 10/31/2013 - Default Building Construction Description

Off-Road Equipment:

1 Cranes (399 hp) operating at a 0.43 load factor for 6 hours per day

2 Forklifts (145 hp) operating at a 0.3 load factor for 6 hours per day

1 Generator Sets (49 hp) operating at a 0.74 load factor for 8 hours per day

1 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 8 hours per day

3 Welders (45 hp) operating at a 0.45 load factor for 8 hours per day

Phase: Architectural Coating 12/1/2013 - 1/31/2014 - Default Architectural Coating Description

Rule: Residential Interior Coatings begins 1/1/2005 ends 6/30/2008 specifies a VOC of 100

Rule: Residential Interior Coatings begins 7/1/2008 ends 12/31/2040 specifies a VOC of 50

Rule: Residential Exterior Coatings begins 1/1/2005 ends 6/30/2008 specifies a VOC of 250

Rule: Residential Exterior Coatings begins 7/1/2008 ends 12/31/2040 specifies a VOC of 100

Rule: Nonresidential Interior Coatings begins 1/1/2005 ends 12/31/2040 specifies a VOC of 250

Rule: Nonresidential Exterior Coatings begins 1/1/2005 ends 12/31/2040 specifies a VOC of 250

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Construction Mitigated Detail Report:

CONSTRUCTION EMISSION ESTIMATES Winter Pounds Per Day, Mitigated

	ROG	NOx	CO	SO2	PM10 Dust	PM10 Exhaust	PM10	PM2.5 Dust	PM2.5 Exhaust	PM2.5	CO2
Time Slice 7/1/2011-7/1/2011 Active Days: 1	7.56	60.87	35.76	0.00	141.58	3.19	144.77	29.57	2.94	32.51	5,971.73
Mass Grading 07/01/2011-10/31/2012	7.56	60.87	35.76	0.00	141.58	3.19	144.77	29.57	2.94	32.51	5,971.73
Mass Grading Dust	0.00	0.00	0.00	0.00	141.56	0.00	141.56	29.56	0.00	29.56	0.00
Mass Grading Off Road Diesel	7.48	60.72	33.21	0.00	0.00	3.18	3.18	0.00	2.93	2.93	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.08	0.15	2.55	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.55
Time Slice 7/4/2011-12/30/2011 Active Days: 130	10.47	**99.75**	50.00	0.06	141.78	**4.70**	146.48	29.63	**4.32**	33.96	11,938.30
Mass Grading 07/01/2011-10/31/2012	7.56	60.87	35.76	0.00	141.58	3.19	144.77	29.57	2.94	32.51	5,971.73
Mass Grading Dust	0.00	0.00	0.00	0.00	141.56	0.00	141.56	29.56	0.00	29.56	0.00
Mass Grading Off Road Diesel	7.48	60.72	33.21	0.00	0.00	3.18	3.18	0.00	2.93	2.93	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.08	0.15	2.55	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.55
Mass Grading 07/02/2011-01/31/2012	2.91	38.88	14.24	0.06	0.20	1.51	1.71	0.07	1.39	1.45	5,966.58
Mass Grading Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Off Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading On Road Diesel	2.91	38.88	14.24	0.06	0.20	1.51	1.71	0.07	1.39	1.45	5,966.58
Mass Grading Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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Time Slice 1/2/2012-1/31/2012 Active Days: 22	9.84	91.83	47.09	0.06	141.78	4.24	146.02	29.63	3.90	33.54	11,937.97
Mass Grading 07/01/2011-10/31/2012	7.18	57.21	34.33	0.00	141.58	2.93	144.50	29.57	2.69	32.26	5,971.39
Mass Grading Dust	0.00	0.00	0.00	0.00	141.56	0.00	141.56	29.56	0.00	29.56	0.00
Mass Grading Off Road Diesel	7.11	57.08	31.98	0.00	0.00	2.92	2.92	0.00	2.68	2.68	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.07	0.13	2.35	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.22
Mass Grading 07/02/2011-01/31/2012	2.66	34.62	12.76	0.06	0.20	1.32	1.52	0.07	1.21	1.28	5,966.58
Mass Grading Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Off Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading On Road Diesel	2.66	34.62	12.76	0.06	0.20	1.32	1.52	0.07	1.21	1.28	5,966.58
Mass Grading Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Time Slice 2/1/2012-10/31/2012 Active Days: 196	7.18	57.21	34.33	0.00	141.58	2.93	144.50	29.57	2.69	32.26	5,971.39
Mass Grading 07/01/2011-10/31/2012	7.18	57.21	34.33	0.00	141.58	2.93	144.50	29.57	2.69	32.26	5,971.39
Mass Grading Dust	0.00	0.00	0.00	0.00	141.56	0.00	141.56	29.56	0.00	29.56	0.00
Mass Grading Off Road Diesel	7.11	57.08	31.98	0.00	0.00	2.92	2.92	0.00	2.68	2.68	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.07	0.13	2.35	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.22

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Time Slice 11/1/2012-12/31/2012 Active Days: 43	2.72	22.00	12.45	0.00	100.01	1.08	101.08	20.89	0.99	21.88	2,371.00
Fine Grading 11/01/2012-02/28/2013	2.72	22.00	12.45	0.00	100.01	1.08	101.08	20.89	0.99	21.88	2,371.00
Fine Grading Dust	0.00	0.00	0.00	0.00	100.00	0.00	100.00	20.88	0.00	20.88	0.00
Fine Grading Off Road Diesel	2.69	21.95	11.51	0.00	0.00	1.07	1.07	0.00	0.99	0.99	2,247.32
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.03	0.05	0.94	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.69
Time Slice 1/1/2013-2/27/2013 Active Days: 42	2.58	20.61	11.97	0.00	100.01	0.99	101.00	20.89	0.91	21.80	2,370.89
Fine Grading 11/01/2012-02/28/2013	2.58	20.61	11.97	0.00	100.01	0.99	101.00	20.89	0.91	21.80	2,370.89
Fine Grading Dust	0.00	0.00	0.00	0.00	100.00	0.00	100.00	20.88	0.00	20.88	0.00
Fine Grading Off Road Diesel	2.55	20.56	11.10	0.00	0.00	0.99	0.99	0.00	0.91	0.91	2,247.32
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.03	0.05	0.87	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.57
Time Slice 2/28/2013-2/28/2013 Active Days: 1	4.32	34.78	20.80	0.00	100.01	1.67	101.68	20.89	1.54	22.43	4,209.09
Fine Grading 11/01/2012-02/28/2013	2.58	20.61	11.97	0.00	100.01	0.99	101.00	20.89	0.91	21.80	2,370.89
Fine Grading Dust	0.00	0.00	0.00	0.00	100.00	0.00	100.00	20.88	0.00	20.88	0.00
Fine Grading Off Road Diesel	2.55	20.56	11.10	0.00	0.00	0.99	0.99	0.00	0.91	0.91	2,247.32
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.03	0.05	0.87	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.57
Trenching 02/28/2013-02/28/2013	1.74	14.17	8.84	0.00	0.01	0.68	0.69	0.00	0.63	0.63	1,838.21
Trenching Off Road Diesel	1.72	14.12	7.97	0.00	0.00	0.68	0.68	0.00	0.62	0.62	1,714.64
Trenching Worker Trips	0.03	0.05	0.87	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.57

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Time Slice 3/1/2013-10/31/2013 Active Days: 175	8.54	63.67	**96.21**	**0.19**	0.75	3.00	3.75	0.26	2.73	2.99	**20,559.05**
Building 03/01/2013-10/31/2013	8.54	63.67	96.21	0.19	0.75	3.00	3.75	0.26	2.73	2.99	20,559.05
Building Off Road Diesel	2.88	13.91	10.20	0.00	0.00	0.93	0.93	0.00	0.86	0.86	1,621.20
Building Vendor Trips	4.17	46.95	36.28	0.11	0.41	1.84	2.25	0.14	1.69	1.82	11,854.59
Building Worker Trips	1.49	2.82	49.73	0.07	0.34	0.23	0.57	0.12	0.19	0.31	7,083.26
Time Slice 11/1/2013-11/29/2013 Active Days: 21	3.44	16.02	10.91	0.01	0.03	1.21	1.25	0.01	1.12	1.13	1,982.56
Asphalt 11/01/2013-11/30/2013	3.44	16.02	10.91	0.01	0.03	1.21	1.25	0.01	1.12	1.13	1,982.56
Paving Off-Gas	1.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paving Off Road Diesel	2.10	12.84	8.03	0.00	0.00	1.09	1.09	0.00	1.00	1.00	1,131.92
Paving On Road Diesel	0.24	3.09	1.15	0.01	0.02	0.12	0.14	0.01	0.11	0.11	603.51
Paving Worker Trips	0.05	0.10	1.74	0.00	0.01	0.01	0.02	0.00	0.01	0.01	247.14
Time Slice 12/2/2013-12/31/2013 Active Days: 22	143.10	0.18	3.22	0.00	0.02	0.01	0.04	0.01	0.01	0.02	458.29
Coating 12/01/2013-01/31/2014	143.10	0.18	3.22	0.00	0.02	0.01	0.04	0.01	0.01	0.02	458.29
Architectural Coating	143.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.10	0.18	3.22	0.00	0.02	0.01	0.04	0.01	0.01	0.02	458.29
Time Slice 1/1/2014-1/31/2014 Active Days: 23	143.09	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90
Coating 12/01/2013-01/31/2014	143.09	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90
Architectural Coating	143.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.09	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90

Construction Related Mitigation Measures

The following mitigation measures apply to Phase: Mass Grading 7/1/2011 - 10/31/2012 - Default Mass Site Grading/Excavation Description

For Soil Stablizing Measures, the Water exposed surfaces 3x daily watering mitigation reduces emissions by:

PM10: 75% PM25: 75%

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For Unpaved Roads Measures, the Manage haul road dust 3x daily watering mitigation reduces emissions by:

PM10: 75% PM25: 75%

The following mitigation measures apply to Phase: Architectural Coating 12/1/2013 - 1/31/2014 - Default Architectural Coating Description

For Residential Architectural Coating Measures, the Residential Exterior: Use Low VOC Coatings mitigation reduces emissions by:

ROG: 10%

For Residential Architectural Coating Measures, the Residential Interior: Use Low VOC Coatings mitigation reduces emissions by:

ROG: 10%

For Nonresidential Architectural Coating Measures, the Nonresidential Exterior: Use Low VOC Coatings mitigation reduces emissions by:

ROG: 10%

For Nonresidential Architectural Coating Measures, the Nonresidential Interior: Use Low VOC Coatings mitigation reduces emissions by:

ROG: 10%

ATTACHMENT D

URBEMIS Output for 6.25 Mile Round Trip Hauling Distance – 219 Truck Trips

8/23/2012 11:57:41 AM

Urbemis 2007 Version 9.2.4

Combined Winter Emissions Reports (Pounds/Day)

File Name: R:\General Air Quality Info\Projects\0D2133100 - Palm-Industrial Distribution Center Project EIR\Modeling\August 2012 calcs\6 mile SANBAG disposal.urb924

Project Name: Palm Industrial - Revised August 2012 - 6.25 mile Haul Truck Round Trip - Mitigated

Project Location: San Bernadino County

On-Road Vehicle Emissions Based on: Version : Emfac2007 V2.3 Nov 1 2006

Off-Road Vehicle Emissions Based on: OFFROAD2007

Summary Report:

CONSTRUCTION EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10 Dust	PM10 Exhaust	PM10	PM2.5 Dust	PM2.5 Exhaust	PM2.5	CO2
2011 TOTALS (lbs/day unmitigated)	10.40	98.73	49.63	0.06	566.46	4.66	571.12	118.32	4.29	122.61	11,781.70
2011 TOTALS (lbs/day mitigated)	10.40	98.73	49.63	0.06	141.77	4.66	146.43	29.63	4.29	33.92	11,781.70
2012 TOTALS (lbs/day unmitigated)	9.77	90.92	46.75	0.06	566.46	4.21	570.67	118.32	3.87	122.20	11,781.37
2012 TOTALS (lbs/day mitigated)	9.77	90.92	46.75	0.06	141.77	4.21	145.98	29.63	3.87	33.50	11,781.37
2013 TOTALS (lbs/day unmitigated)	317.88	63.67	96.21	0.19	100.01	3.00	101.68	20.89	2.73	22.43	20,559.05
2013 TOTALS (lbs/day mitigated)	143.10	63.67	96.21	0.19	100.01	3.00	101.68	20.89	2.73	22.43	20,559.05
2014 TOTALS (lbs/day unmitigated)	317.87	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90
2014 TOTALS (lbs/day mitigated)	143.09	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90

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Construction Unmitigated Detail Report:

CONSTRUCTION EMISSION ESTIMATES Winter Pounds Per Day, Unmitigated

	ROG	NOx	CO	SO2	PM10 Dust	PM10 Exhaust	PM10	PM2.5 Dust	PM2.5 Exhaust	PM2.5	CO2
Time Slice 7/1/2011-7/1/2011 Active Days: 1	7.56	60.87	35.76	0.00	566.26	3.19	569.46	118.26	2.94	121.20	5,971.73
Mass Grading 07/01/2011-10/31/2012	7.56	60.87	35.76	0.00	566.26	3.19	569.46	118.26	2.94	121.20	5,971.73
Mass Grading Dust	0.00	0.00	0.00	0.00	566.25	0.00	566.25	118.26	0.00	118.26	0.00
Mass Grading Off Road Diesel	7.48	60.72	33.21	0.00	0.00	3.18	3.18	0.00	2.93	2.93	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.08	0.15	2.55	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.55
Time Slice 7/4/2011-12/30/2011 Active Days: 130	10.40	**98.73**	49.63	0.06	**566.46**	**4.66**	**571.12**	**118.32**	**4.29**	**122.61**	11,781.70
Mass Grading 07/01/2011-10/31/2012	7.56	60.87	35.76	0.00	566.26	3.19	569.46	118.26	2.94	121.20	5,971.73
Mass Grading Dust	0.00	0.00	0.00	0.00	566.25	0.00	566.25	118.26	0.00	118.26	0.00
Mass Grading Off Road Diesel	7.48	60.72	33.21	0.00	0.00	3.18	3.18	0.00	2.93	2.93	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.08	0.15	2.55	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.55
Mass Grading 07/02/2011-01/31/2012	2.83	37.86	13.87	0.05	0.19	1.47	1.66	0.06	1.35	1.41	5,809.98
Mass Grading Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Off Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading On Road Diesel	2.83	37.86	13.87	0.05	0.19	1.47	1.66	0.06	1.35	1.41	5,809.98
Mass Grading Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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Time Slice 1/2/2012-1/31/2012 Active Days: 22	9.77	90.92	46.75	0.06	**566.46**	4.21	570.67	**118.32**	3.87	122.20	11,781.37
Mass Grading 07/01/2011-10/31/2012	7.18	57.21	34.33	0.00	566.26	2.93	569.19	118.26	2.69	120.95	5,971.39
Mass Grading Dust	0.00	0.00	0.00	0.00	566.25	0.00	566.25	118.26	0.00	118.26	0.00
Mass Grading Off Road Diesel	7.11	57.08	31.98	0.00	0.00	2.92	2.92	0.00	2.68	2.68	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.07	0.13	2.35	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.22
Mass Grading 07/02/2011-01/31/2012	2.59	33.71	12.42	0.05	0.19	1.28	1.48	0.06	1.18	1.24	5,809.98
Mass Grading Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Off Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading On Road Diesel	2.59	33.71	12.42	0.05	0.19	1.28	1.48	0.06	1.18	1.24	5,809.98
Mass Grading Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Time Slice 2/1/2012-10/31/2012 Active Days: 196	7.18	57.21	34.33	0.00	566.26	2.93	569.19	118.26	2.69	120.95	5,971.39
Mass Grading 07/01/2011-10/31/2012	7.18	57.21	34.33	0.00	566.26	2.93	569.19	118.26	2.69	120.95	5,971.39
Mass Grading Dust	0.00	0.00	0.00	0.00	566.25	0.00	566.25	118.26	0.00	118.26	0.00
Mass Grading Off Road Diesel	7.11	57.08	31.98	0.00	0.00	2.92	2.92	0.00	2.68	2.68	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.07	0.13	2.35	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.22

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Time Slice 11/1/2012-12/31/2012 Active Days: 43	2.72	22.00	12.45	0.00	100.01	1.08	101.08	20.89	0.99	21.88	2,371.00
Fine Grading 11/01/2012-02/28/2013	2.72	22.00	12.45	0.00	100.01	1.08	101.08	20.89	0.99	21.88	2,371.00
Fine Grading Dust	0.00	0.00	0.00	0.00	100.00	0.00	100.00	20.88	0.00	20.88	0.00
Fine Grading Off Road Diesel	2.69	21.95	11.51	0.00	0.00	1.07	1.07	0.00	0.99	0.99	2,247.32
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.03	0.05	0.94	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.69
Time Slice 1/1/2013-2/27/2013 Active Days: 42	2.58	20.61	11.97	0.00	100.01	0.99	101.00	20.89	0.91	21.80	2,370.89
Fine Grading 11/01/2012-02/28/2013	2.58	20.61	11.97	0.00	100.01	0.99	101.00	20.89	0.91	21.80	2,370.89
Fine Grading Dust	0.00	0.00	0.00	0.00	100.00	0.00	100.00	20.88	0.00	20.88	0.00
Fine Grading Off Road Diesel	2.55	20.56	11.10	0.00	0.00	0.99	0.99	0.00	0.91	0.91	2,247.32
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.03	0.05	0.87	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.57
Time Slice 2/28/2013-2/28/2013 Active Days: 1	4.32	34.78	20.80	0.00	100.01	1.67	101.68	20.89	1.54	22.43	4,209.09
Fine Grading 11/01/2012-02/28/2013	2.58	20.61	11.97	0.00	100.01	0.99	101.00	20.89	0.91	21.80	2,370.89
Fine Grading Dust	0.00	0.00	0.00	0.00	100.00	0.00	100.00	20.88	0.00	20.88	0.00
Fine Grading Off Road Diesel	2.55	20.56	11.10	0.00	0.00	0.99	0.99	0.00	0.91	0.91	2,247.32
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.03	0.05	0.87	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.57
Trenching 02/28/2013-02/28/2013	1.74	14.17	8.84	0.00	0.01	0.68	0.69	0.00	0.63	0.63	1,838.21
Trenching Off Road Diesel	1.72	14.12	7.97	0.00	0.00	0.68	0.68	0.00	0.62	0.62	1,714.64
Trenching Worker Trips	0.03	0.05	0.87	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.57

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Time Slice 3/1/2013-10/31/2013 Active Days: 175	8.54	63.67	**96.21**	**0.19**	0.75	3.00	3.75	0.26	2.73	2.99	**20,559.05**
Building 03/01/2013-10/31/2013	8.54	63.67	96.21	0.19	0.75	3.00	3.75	0.26	2.73	2.99	20,559.05
Building Off Road Diesel	2.88	13.91	10.20	0.00	0.00	0.93	0.93	0.00	0.86	0.86	1,621.20
Building Vendor Trips	4.17	46.95	36.28	0.11	0.41	1.84	2.25	0.14	1.69	1.82	11,854.59
Building Worker Trips	1.49	2.82	49.73	0.07	0.34	0.23	0.57	0.12	0.19	0.31	7,083.26
Time Slice 11/1/2013-11/29/2013 Active Days: 21	3.44	16.02	10.91	0.01	0.03	1.21	1.25	0.01	1.12	1.13	1,982.56
Asphalt 11/01/2013-11/30/2013	3.44	16.02	10.91	0.01	0.03	1.21	1.25	0.01	1.12	1.13	1,982.56
Paving Off-Gas	1.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paving Off Road Diesel	2.10	12.84	8.03	0.00	0.00	1.09	1.09	0.00	1.00	1.00	1,131.92
Paving On Road Diesel	0.24	3.09	1.15	0.01	0.02	0.12	0.14	0.01	0.11	0.11	603.51
Paving Worker Trips	0.05	0.10	1.74	0.00	0.01	0.01	0.02	0.00	0.01	0.01	247.14
Time Slice 12/2/2013-12/31/2013 Active Days: 22	**317.88**	0.18	3.22	0.00	0.02	0.01	0.04	0.01	0.01	0.02	458.29
Coating 12/01/2013-01/31/2014	317.88	0.18	3.22	0.00	0.02	0.01	0.04	0.01	0.01	0.02	458.29
Architectural Coating	317.79	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.10	0.18	3.22	0.00	0.02	0.01	0.04	0.01	0.01	0.02	458.29
Time Slice 1/1/2014-1/31/2014 Active Days: 23	317.87	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90
Coating 12/01/2013-01/31/2014	317.87	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90
Architectural Coating	317.79	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.09	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90

Phase Assumptions

Phase: Fine Grading 11/1/2012 - 2/28/2013 - Default Fine Site Grading/Excavation Description

Total Acres Disturbed: 33.32

Maximum Daily Acreage Disturbed: 5

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Fugitive Dust Level of Detail: Default

20 lbs per acre-day

On Road Truck Travel (VMT): 0

Off-Road Equipment:

1 Graders (174 hp) operating at a 0.61 load factor for 6 hours per day

1 Rubber Tired Dozers (357 hp) operating at a 0.59 load factor for 6 hours per day

1 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 7 hours per day

1 Water Trucks (189 hp) operating at a 0.5 load factor for 8 hours per day

Phase: Mass Grading 7/1/2011 - 10/31/2012 - Default Mass Site Grading/Excavation Description

Total Acres Disturbed: 33.32

Maximum Daily Acreage Disturbed: 5

Fugitive Dust Level of Detail: Low

Onsite Cut/Fill: 4375 cubic yards/day; Offsite Cut/Fill: 0 cubic yards/day

On Road Truck Travel (VMT): 0

Off-Road Equipment:

3 Graders (174 hp) operating at a 0.61 load factor for 6 hours per day

3 Rubber Tired Dozers (357 hp) operating at a 0.59 load factor for 6 hours per day

3 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 7 hours per day

1 Water Trucks (189 hp) operating at a 0.5 load factor for 8 hours per day

Phase: Mass Grading 7/2/2011 - 1/31/2012 - Soil Hauling Only

Total Acres Disturbed: 0

Maximum Daily Acreage Disturbed: 0

Fugitive Dust Level of Detail: Low

Onsite Cut/Fill: 0 cubic yards/day; Offsite Cut/Fill: 0 cubic yards/day

On Road Truck Travel (VMT): 1370.79

Off-Road Equipment:

Phase: Trenching 2/28/2013 - 2/28/2013 - Default Trenching Description

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Off-Road Equipment:

2 Excavators (168 hp) operating at a 0.57 load factor for 8 hours per day

1 Other General Industrial Equipment (238 hp) operating at a 0.51 load factor for 8 hours per day

1 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 0 hours per day

Phase: Paving 11/1/2013 - 11/30/2013 - Default Paving Description

Acres to be Paved: 8.33

Off-Road Equipment:

4 Cement and Mortar Mixers (10 hp) operating at a 0.56 load factor for 6 hours per day

1 Pavers (100 hp) operating at a 0.62 load factor for 7 hours per day

2 Paving Equipment (104 hp) operating at a 0.53 load factor for 6 hours per day

1 Rollers (95 hp) operating at a 0.56 load factor for 7 hours per day

Phase: Building Construction 3/1/2013 - 10/31/2013 - Default Building Construction Description

Off-Road Equipment:

1 Cranes (399 hp) operating at a 0.43 load factor for 6 hours per day

2 Forklifts (145 hp) operating at a 0.3 load factor for 6 hours per day

1 Generator Sets (49 hp) operating at a 0.74 load factor for 8 hours per day

1 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 8 hours per day

3 Welders (45 hp) operating at a 0.45 load factor for 8 hours per day

Phase: Architectural Coating 12/1/2013 - 1/31/2014 - Default Architectural Coating Description

Rule: Residential Interior Coatings begins 1/1/2005 ends 6/30/2008 specifies a VOC of 100

Rule: Residential Interior Coatings begins 7/1/2008 ends 12/31/2040 specifies a VOC of 50

Rule: Residential Exterior Coatings begins 1/1/2005 ends 6/30/2008 specifies a VOC of 250

Rule: Residential Exterior Coatings begins 7/1/2008 ends 12/31/2040 specifies a VOC of 100

Rule: Nonresidential Interior Coatings begins 1/1/2005 ends 12/31/2040 specifies a VOC of 250

Rule: Nonresidential Exterior Coatings begins 1/1/2005 ends 12/31/2040 specifies a VOC of 250

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Construction Mitigated Detail Report:

CONSTRUCTION EMISSION ESTIMATES Winter Pounds Per Day, Mitigated

	ROG	NOx	CO	SO2	PM10 Dust	PM10 Exhaust	PM10	PM2.5 Dust	PM2.5 Exhaust	PM2.5	CO2
Time Slice 7/1/2011-7/1/2011 Active Days: 1	7.56	60.87	35.76	0.00	141.58	3.19	144.77	29.57	2.94	32.51	5,971.73
Mass Grading 07/01/2011-10/31/2012	7.56	60.87	35.76	0.00	141.58	3.19	144.77	29.57	2.94	32.51	5,971.73
Mass Grading Dust	0.00	0.00	0.00	0.00	141.56	0.00	141.56	29.56	0.00	29.56	0.00
Mass Grading Off Road Diesel	7.48	60.72	33.21	0.00	0.00	3.18	3.18	0.00	2.93	2.93	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.08	0.15	2.55	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.55
Time Slice 7/4/2011-12/30/2011 Active Days: 130	10.40	**98.73**	49.63	0.06	141.77	**4.66**	146.43	29.63	**4.29**	33.92	11,781.70
Mass Grading 07/01/2011-10/31/2012	7.56	60.87	35.76	0.00	141.58	3.19	144.77	29.57	2.94	32.51	5,971.73
Mass Grading Dust	0.00	0.00	0.00	0.00	141.56	0.00	141.56	29.56	0.00	29.56	0.00
Mass Grading Off Road Diesel	7.48	60.72	33.21	0.00	0.00	3.18	3.18	0.00	2.93	2.93	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.08	0.15	2.55	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.55
Mass Grading 07/02/2011-01/31/2012	2.83	37.86	13.87	0.05	0.19	1.47	1.66	0.06	1.35	1.41	5,809.98
Mass Grading Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Off Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading On Road Diesel	2.83	37.86	13.87	0.05	0.19	1.47	1.66	0.06	1.35	1.41	5,809.98
Mass Grading Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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Time Slice 1/2/2012-1/31/2012 Active Days: 22	9.77	90.92	46.75	0.06	141.77	4.21	145.98	29.63	3.87	33.50	11,781.37
Mass Grading 07/01/2011-10/31/2012	7.18	57.21	34.33	0.00	141.58	2.93	144.50	29.57	2.69	32.26	5,971.39
Mass Grading Dust	0.00	0.00	0.00	0.00	141.56	0.00	141.56	29.56	0.00	29.56	0.00
Mass Grading Off Road Diesel	7.11	57.08	31.98	0.00	0.00	2.92	2.92	0.00	2.68	2.68	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.07	0.13	2.35	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.22
Mass Grading 07/02/2011-01/31/2012	2.59	33.71	12.42	0.05	0.19	1.28	1.48	0.06	1.18	1.24	5,809.98
Mass Grading Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Off Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading On Road Diesel	2.59	33.71	12.42	0.05	0.19	1.28	1.48	0.06	1.18	1.24	5,809.98
Mass Grading Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Time Slice 2/1/2012-10/31/2012 Active Days: 196	7.18	57.21	34.33	0.00	141.58	2.93	144.50	29.57	2.69	32.26	5,971.39
Mass Grading 07/01/2011-10/31/2012	7.18	57.21	34.33	0.00	141.58	2.93	144.50	29.57	2.69	32.26	5,971.39
Mass Grading Dust	0.00	0.00	0.00	0.00	141.56	0.00	141.56	29.56	0.00	29.56	0.00
Mass Grading Off Road Diesel	7.11	57.08	31.98	0.00	0.00	2.92	2.92	0.00	2.68	2.68	5,662.17
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.07	0.13	2.35	0.00	0.01	0.01	0.02	0.01	0.01	0.01	309.22

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Time Slice 11/1/2012-12/31/2012 Active Days: 43	2.72	22.00	12.45	0.00	100.01	1.08	101.08	20.89	0.99	21.88	2,371.00
Fine Grading 11/01/2012-02/28/2013	2.72	22.00	12.45	0.00	100.01	1.08	101.08	20.89	0.99	21.88	2,371.00
Fine Grading Dust	0.00	0.00	0.00	0.00	100.00	0.00	100.00	20.88	0.00	20.88	0.00
Fine Grading Off Road Diesel	2.69	21.95	11.51	0.00	0.00	1.07	1.07	0.00	0.99	0.99	2,247.32
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.03	0.05	0.94	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.69
Time Slice 1/1/2013-2/27/2013 Active Days: 42	2.58	20.61	11.97	0.00	100.01	0.99	101.00	20.89	0.91	21.80	2,370.89
Fine Grading 11/01/2012-02/28/2013	2.58	20.61	11.97	0.00	100.01	0.99	101.00	20.89	0.91	21.80	2,370.89
Fine Grading Dust	0.00	0.00	0.00	0.00	100.00	0.00	100.00	20.88	0.00	20.88	0.00
Fine Grading Off Road Diesel	2.55	20.56	11.10	0.00	0.00	0.99	0.99	0.00	0.91	0.91	2,247.32
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.03	0.05	0.87	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.57
Time Slice 2/28/2013-2/28/2013 Active Days: 1	4.32	34.78	20.80	0.00	100.01	1.67	101.68	20.89	1.54	22.43	4,209.09
Fine Grading 11/01/2012-02/28/2013	2.58	20.61	11.97	0.00	100.01	0.99	101.00	20.89	0.91	21.80	2,370.89
Fine Grading Dust	0.00	0.00	0.00	0.00	100.00	0.00	100.00	20.88	0.00	20.88	0.00
Fine Grading Off Road Diesel	2.55	20.56	11.10	0.00	0.00	0.99	0.99	0.00	0.91	0.91	2,247.32
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.03	0.05	0.87	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.57
Trenching 02/28/2013-02/28/2013	1.74	14.17	8.84	0.00	0.01	0.68	0.69	0.00	0.63	0.63	1,838.21
Trenching Off Road Diesel	1.72	14.12	7.97	0.00	0.00	0.68	0.68	0.00	0.62	0.62	1,714.64
Trenching Worker Trips	0.03	0.05	0.87	0.00	0.01	0.00	0.01	0.00	0.00	0.01	123.57

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Time Slice 3/1/2013-10/31/2013 Active Days: 175	8.54	63.67	**96.21**	**0.19**	0.75	3.00	3.75	0.26	2.73	2.99	**20,559.05**
Building 03/01/2013-10/31/2013	8.54	63.67	96.21	0.19	0.75	3.00	3.75	0.26	2.73	2.99	20,559.05
Building Off Road Diesel	2.88	13.91	10.20	0.00	0.00	0.93	0.93	0.00	0.86	0.86	1,621.20
Building Vendor Trips	4.17	46.95	36.28	0.11	0.41	1.84	2.25	0.14	1.69	1.82	11,854.59
Building Worker Trips	1.49	2.82	49.73	0.07	0.34	0.23	0.57	0.12	0.19	0.31	7,083.26
Time Slice 11/1/2013-11/29/2013 Active Days: 21	3.44	16.02	10.91	0.01	0.03	1.21	1.25	0.01	1.12	1.13	1,982.56
Asphalt 11/01/2013-11/30/2013	3.44	16.02	10.91	0.01	0.03	1.21	1.25	0.01	1.12	1.13	1,982.56
Paving Off-Gas	1.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paving Off Road Diesel	2.10	12.84	8.03	0.00	0.00	1.09	1.09	0.00	1.00	1.00	1,131.92
Paving On Road Diesel	0.24	3.09	1.15	0.01	0.02	0.12	0.14	0.01	0.11	0.11	603.51
Paving Worker Trips	0.05	0.10	1.74	0.00	0.01	0.01	0.02	0.00	0.01	0.01	247.14
Time Slice 12/2/2013-12/31/2013 Active Days: 22	143.10	0.18	3.22	0.00	0.02	0.01	0.04	0.01	0.01	0.02	458.29
Coating 12/01/2013-01/31/2014	143.10	0.18	3.22	0.00	0.02	0.01	0.04	0.01	0.01	0.02	458.29
Architectural Coating	143.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.10	0.18	3.22	0.00	0.02	0.01	0.04	0.01	0.01	0.02	458.29
Time Slice 1/1/2014-1/31/2014 Active Days: 23	143.09	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90
Coating 12/01/2013-01/31/2014	143.09	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90
Architectural Coating	143.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.09	0.17	2.97	0.00	0.02	0.01	0.04	0.01	0.01	0.02	457.90

Construction Related Mitigation Measures

The following mitigation measures apply to Phase: Mass Grading 7/1/2011 - 10/31/2012 - Default Mass Site Grading/Excavation Description

For Soil Stablizing Measures, the Water exposed surfaces 3x daily watering mitigation reduces emissions by:

PM10: 75% PM25: 75%

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For Unpaved Roads Measures, the Manage haul road dust 3x daily watering mitigation reduces emissions by:

PM10: 75% PM25: 75%

The following mitigation measures apply to Phase: Architectural Coating 12/1/2013 - 1/31/2014 - Default Architectural Coating Description

For Residential Architectural Coating Measures, the Residential Exterior: Use Low VOC Coatings mitigation reduces emissions by:

ROG: 10%

For Residential Architectural Coating Measures, the Residential Interior: Use Low VOC Coatings mitigation reduces emissions by:

ROG: 10%

For Nonresidential Architectural Coating Measures, the Nonresidential Exterior: Use Low VOC Coatings mitigation reduces emissions by:

ROG: 10%

For Nonresidential Architectural Coating Measures, the Nonresidential Interior: Use Low VOC Coatings mitigation reduces emissions by:

ROG: 10%

Appendix B Biological Resources Technical Memorandum

Technical Memorandum

Cardno ENTRIX

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Date November 27, 2012

To: Alison Rondone
Atkins Global, Inc.

cc: Patrick Spillane; IDS Real Estate Group

From: May Lau; John Spranza

RE: CEQA Addendum to Palm/Industrial Distribution Center EIR – Biological Resources

1.0 Background

1.1 Existing Environmental Compliance

In September 2011, the City of San Bernardino (City) adopted Environmental Impact Report (EIR) No. 2007081029: Palm/Industrial Distribution Center Project (Project). The City was the lead agency under the California Environmental Quality Act (CEQA).

1.2 Status

In response to minor project changes, the City has prepared this CEQA Addendum to the project's EIR. The project changes are minor and include a slightly modified site plan to accommodate the SANBAG grade separation project along the intersection of Industrial Parkway and Palm Avenue. Although no new significant environmental effects are associated with the refined Project, up-to-date biological information and reports have resulted in the need for minor technical changes to the EIR's biological resources discussion and corresponding mitigation measures.

2.0 Project Description

The proposed project remains as described in the EIR and includes the construction of a warehouse/distribution facility consisting of a single building totaling 678,275 square feet (sf) on approximately 39 acres. Lot coverage would be 43 percent and the building height of the proposed project would not exceed 40 feet (ft) above finished pad. The existing hill

features located on site would be leveled and approximately 200,000 cubic yards of soil exported. All other excavated soil would remain on site as fill. The front of the proposed project would be sited along Industrial Parkway. The proposed project would include a small office area and a cross-dock loading configuration. The office area would be located at the northwest corner of the warehouse/distribution facility, with trailer docking stations located along the northern and southern facing portions of the structure. Approximately 12 percent of the project site would be landscaped. The proposed project would include an 8-foot wrought-iron fence around the perimeter and a guard shack for entry and exit.

Access to the project site would be from the driveway located at the northern end of the project site on Industrial Parkway. All truck traffic into the project site would be cleared through a guard shack situated at the access driveway. The vast majority of traffic will access Industrial Parkway via Palm Avenue, off I-215.

3.0 Environmental Evaluation

3.1 Biological Resources

This section addresses inconsistencies or inaccuracies of the biological resources section of the EIR that are based on new or updated information pertaining to special-status species, habitats, or potentially jurisdictional features, and include the following:

1. United States Fish and Wildlife Service (USFWS) protocol surveys for the California gnatcatcher (*Polioptila californica californica*) conducted in May and June 2012 (LSA 2012a; Appendix A)
2. USFWS protocol surveys for the San Bernardino Kangaroo Rat (*Dipodomys merriami parvus*) conducted in June 2012 (LSA 2012b; Appendix A)
3. Jurisdictional delineation of potential waters of the U.S. and California conducted in July 2012 (Cardno ENTRIX 2012a)
4. Biological field survey conducted in July 2012 (Cardno ENTRIX 2012b; Appendix A)
5. Review of recent literature/databases regarding special-status species (Appendix A)
6. Evaluation of Potential Jurisdictional Streambed Resources (LSA 2012c; Appendix A)

3.2 Vegetation Communities

The habitats described in the 2007 and 2010 biological technical reports (PBS&J 2007; PBS&J 2010) prepared for the Project are predominantly the same in quantity and quality as observed during the 2012 biological survey. However, due to slight changes to the finalized project site plan, and in consideration

of the biological field survey and jurisdictional delineation conducted by Cardno ENTRIX in July 2012, slight changes to the acreages and classification of the habitats within the Study Area have been made, as shown in Table 1 and depicted in Figure 1.

The descriptions of the coastal sage scrub, disced, and ruderal habitats remain unchanged, with the exception of the addition of "bare ground" and "developed" areas, and the aforementioned slight changes in acreage. Several unvegetated, dirt roads were misclassified as part of the coastal sage scrub community, and the vegetation mapping has been updated to change them to "disced/bare ground" (Figure 1). A small, developed area was also added to the project site to include the vacant dirt and gravel lot in the northwestern portion of the Project site (Figure 1).

The EIR did not rely on any formal jurisdictional delineation of hydrologic features to either properly classify or assess them as potential state and federal waters. Based on the July 2012 wetland delineation of the Project site (Cardno ENTRIX 2012a), the 0.51-acre "ephemeral wash" that was identified in the 2007 biological report has been modified, as it is more characteristic of an erosional or topographic feature rather than an ephemeral wash. This is due to its limited function in water conveyance (e.g., limited to localized runoff), it's lack of defined features common to ephemeral drainages (e.g., consistent bed and bank), and that its origin is an adjacent man-made stormwater drainage from the on-ramp of Interstate 215s. Lastly, as the vegetated portion of this feature consists of coastal sage scrub species, as accurately described in the 2007 biological report, the updated vegetation mapping depicts this as coastal sage scrub rather than a misidentified "ephemeral wash" (Figure 1).

3.3 Critical Habitat

The Final EIR indicated the project area lies within critical habitat designated for coastal California gnatcatcher. However, based on recent review of the USFWS critical habitat portal, the study area does not occur within any USFWS-designated critical habitat, including that which has been finalized by the USFWS for the coastal California gnatcatcher and San Bernardino kangaroo rat (USFWS 2012). Mitigation measures 4.3-2 and 4.3-9 have been revised to reflect this change (Table 2).

3.4 Special-Status Wildlife Species

Recent literature and database review included an updated review of all sources used in the Final EIR, as well as recently conducted biological surveys and reports, which are provided in Appendix A. In consideration of habitat preferences and known ranges of special-status wildlife species that could potentially occur in the region, there were no additional special-status wildlife species that could potentially occur in the study area that were not previously identified in the EIR. Protocol surveys were recently conducted for coastal California gnatcatcher and San Bernardino kangaroo rats, and were determined to be absent from the project site (Appendix A); however, these negative findings do not require any corrections to the EIR.

3.5 Special-Status Plant Species

Based on recent literature and database review, and taking into account the habitat, elevation, and blooming periods of each species, the following six special-status plant species have a moderate or greater potential to occur within the Study Area, and were not previously identified in the EIR.

- thread-leaved brodiaea (*Brodiaea filifolia*)
- Parry's spineflower (*Chorizanthe parryi* var. *parryi*)
- slender-horned spineflower (*Dodecahema leptoceras*)
- Santa Ana River woollystar (*Eriastrum densifolium* ssp. *sanctorum*)
- Robinson's pepper-grass (*Lepidium virginicum* var. *robinsonii*)
- Parish's desert-thorn (*Lycium parishii*)

The presence or absence of these special-status plant species, along with Plummer's mariposa lily (*Calochortus plummerae*) and mesa horkelia *(Horkelia cuneata* ssp. *puberula*), which were previously identified in the Final EIR, would be determined during preconstruction floristic surveys per the revised mitigation measure 4.3-7 (Table 2).

3.6 Potential Federal and State Jurisdictional Waters

Federal Waters

The Project area contains two topographic features (Figure 4) that are unnamed and not identified on the San Bernardino North USGS topographic map. Historic (1938) aerial images of the site show remnants of stream channels crossing the site, but they have been cut off from the stream that was their apparent source decades ago by construction of a road now known as SR 206 / Kendall Drive. From surveys of the features, it appears that they intercept localized stormwater sheetflow from portions of the project site and roadway runoff from adjacent portions of I-215 and Palm Avenue (Figure 2).

The topographic features were delineated in accordance with the 1987 Corps of Engineers Wetlands Delineation Manual and do not contain an Ordinary High Water Mark (OHWM) nor does it meet the Clean Water Act (CWA) definition of "other waters" of the U.S (Cardno ENTRIX 2012). Therefore, based on the results of the jurisdictional delineation, the entire approximately 39-acre Study Area, including the delineated topographic features, do not appear to fall under the regulatory authority of the U.S. Army Corps of Engineers (Corps) or the Santa Ana Regional Water Quality Control Board (RWQCB) per Sections 404 and 401 of the CWA.

A request for an approved jurisdictional determination from the Corps has been made to verify that a Section 404 CWA permit is not required.

State Waters: Porter-Cologne Act and CDFG Jurisdiction

The Porter-Cologne Act is the principal law governing water quality in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. Unlike the Clean Water Act, Porter-Cologne applies to both surface water and ground water. An August 10, 2012 consultation with the Santa Ana Regional Water Quality Control Board (RWQCB) confirmed that the delineated features are not subject to the jurisdiction of the RWQCB pursuant to the Porter-Cologne Water Quality Control Act.[1] Mark Adelson Chief, Regional Planning Programs Section of the Santa Ana RWQCB concluded that no Report of Waste Discharge or Waste Discharge Requirements are required for this project. The basis for the conclusion was that other than ground water recharge, the site does not appear to support any water quality beneficial uses recognized by the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan).[2] A revision to mitigation measure 4.3-10 has been made to only require a Report of Waste Discharge if the RWQCB determines it's necessary (Table 2).

The CDFG, through provisions of the California Fish and Game Code (Sec. 1600 et seq.), is empowered to issue agreements for any substantial alteration of a river, stream, or lake where fish or wildlife resources may be substantially adversely affected. The CDFG's Streambed Alteration Program, as administrated per Section 1602, requires an entity to notify the CDFG of any proposed activity that may substantially modify a river, stream, or lake. Specifically, notification is required by any person, business, state or local government agency, or public utility that proposes an activity that will:

- substantially divert or obstruct the natural flow of any river, stream or lake;
- substantially change or use any material from the bed, channel, or bank of, any river,
- stream, or lake; or
- deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake.

The notification requirement applies to any work undertaken in or near a river, stream, or lake that flows at least intermittently through a bed or channel.

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[1] Adelson, Mark. 2012. Personal communication via email with the Santa Ana Regional Water Quality Control Board. August 10.

[2] Adelson, Mark. 2012. Personal communication via email with the Santa Ana Regional Water Quality Control Board. August 10.

Two independent surveys of the Study Area were performed to assess the topographical features for potential jurisdiction under 1602, one during the dry season (Cardno ENTRIX 2012a) and one during the wet season (LSA Associates 2012c). Results of both surveys concluded that the two features (Topographic Feature 1 and Topographic Feature 2; Figure 2) do not contain the required elements of a stream that would necessitate the need for a Streambed Agreement under Section 1602 (i.e., sediment deposits and debris lines, Photographs 1 through 5). [3] Specifically, there are a few isolated locations where erosion has taken place, creating a shallow shelf that resembles a bank. However, these areas are very short, discontinuous, and infrequent sections of the overall length of the features, which otherwise show no discernible evidence of defined bed and banks. Some minor scour was observed along Topographic Feature 1, where stormwater from I-215 enters the site, presumably a result of localized runoff. Neither feature connects to another stream or channel in the project vicinity. In fact, both features dissipate onto flat surfaces within the Study Area and do not reappear. No standing or flowing water was observed in any survey dating back to 2007, nor was any groundwater or moist soil encountered when excavating pits during the 2012 delineation performed for the Corps. No riparian vegetation is associated with this feature, and all vegetation is upland species typical of the ruderal and sage communities found on site.

The characteristics of these two features are incompatible with the channel features typical of those found in streams. Consequently, as the features do not have a defined bed or bank, riparian vegetation or aquatic habitat, these topographical features do not contain the essential elements of a stream as defined in Title 14 of the California Code of Regulations, Section 1.72, and would not require a Streambed Agreement pursuant to Section 1600 of the California Fish and Game Code.[4]

4.0 References

Cardno ENTRIX. 2012a. Jurisdictional Delineation of Wetlands and Waters Palm/Industrial Distribution Center. September.

Cardno ENTRIX. 2012b. Biological Update for the Palm/Industrial Distribution Center Project Site. November.

LSA Associates, Inc. 2012a. Results of Focused California Gnatcatcher Breeding Season Survey on the Palm/Industrial Distribution Center Project Site, July 9.

LSA Associates, Inc. 2012b. San Bernardino Kangaroo Rat Survey for a 35-Acre Parcel in the City of San Bernardino, San Bernardino County, June 24-29, 2012, July 19.

[3] All jurisdictional determinations and/or opinions are subject to review and verification by the appropriate regulatory agencies.

[4] All jurisdictional determinations and/or opinions are subject to review and verification by the appropriate regulatory agencies.

LSA Associates, Inc. 2012c. Evaluation of Potential Jurisdictional Streambed Resources per Section 1602 of the California Fish and Game Code on a 39-Acre Parcel at Palm Avenue in the City of San Bernardino, San Bernardino County, November 19.

PBS&J. 2007. Palm/Industrial Distribution Center Project Biological Technical Report. October.

PBS&J. 2010. Memorandum: Field Surveys to Confirm Existing Conditions at Palm/Industrial Distribution Center Project, San Bernardino County, CA. October 2.

United States Fish and Wildlife Service. 2012. Critical Habitat Portal. Available online: http://criticalhabitat.fws.gov/crithab/. Accessed August 7.

Tables

November 27, 2012

Cardno ENTRIX
Shaping the Future

Table 1 Vegetation Communities in the Project Site

Vegetation Communities	Acreage as Identified in EIR	Revised Acreage
Coastal Sage Scrub	20.91	21.06
Disced/Bare Ground	13.79	14.49
Ruderal	3.15	3.18
Developed	N/A	0.53

Table 2: Corrected Biological Resources Mitigation Measures

Original Mitigation Measure	Revised Mitigation Measure
MM4.3-2 If California gnatcatcher or San Bernardino kangaroo rat is discovered to occupy the site, then to the extent feasible, habitat for these species shall be avoided through the establishment of a buffer area of 200 feet. Such areas shall be flagged, and encircled with an exclusionary fence. These areas shall be preserved in a conservation easement or other acceptable agreement with a USFWS and/or CDFG approved agency. Any such agreements shall be conducted in coordination with the USFWS and/or CDFG. If impacts on California gnatcatcher or San Bernardino kangaroo rat or their occupied habitat are unavoidable, then formal consultation with the USFWS pursuant to either Section 7 (with federal nexus) or Section 10 (without federal nexus) of FESA, and with CDFG pursuant to the CESA would be required. Specific mitigation measures would be developed as a part of the agency consultation, but would include a combination of on-site avoidance and preservation, and/or creation and preservation of off-site habitat, or payment into an off-site mitigation bank. The mitigation ratio for compensation of suitable habitat lost will not be less than 1:1, and an additional 1:1 for the loss of Critical Habitat.	MM4.3-2 If California gnatcatcher or San Bernardino kangaroo rat is discovered to occupy the site, then to the extent feasible, habitat for these species shall be avoided through the establishment of a buffer area of 200 feet. Such areas shall be flagged, and encircled with an exclusionary fence. These areas shall be preserved in a conservation easement or other acceptable agreement with a USFWS and/or CDFG approved agency. Any such agreements shall be conducted in coordination with the USFWS and/or CDFG. If impacts on California gnatcatcher or San Bernardino kangaroo rat or their ~~occupied~~ habitat are unavoidable, then formal consultation with the USFWS pursuant to either Section 7 (with federal nexus) or Section 10 (without federal nexus) of FESA, and with CDFG pursuant to the CESA would be required. Specific mitigation measures would be developed as a part of the agency consultation, but would include a combination of feasible on-site avoidance and preservation, and/or creation and preservation of off-site habitat, or payment into an off-site mitigation bank. The mitigation ratio for compensation of suitable habitat lost will not be less than 1:1~~, and an additional 1:1 for the loss of Critical Habitat~~.
MM4.3-7 Nonlisted Sensitive Plant Species. Due to potentially suitable habitat present within the project site for two nonlisted sensitive plant species, the project Applicant shall retain a qualified biologist or botanist to conduct a pre-construction survey of the area within the footprint of impact, and extended 50 feet outside of the impact area. The survey shall be conducted according to applicable CNPS and CDFG protocols, during the species blooming period or, if applicable and appropriate, immediately prior to the onset of project-related disturbances. The purpose of the pre-construction survey shall be to locate any special-status plant species that have a moderate or greater potential to occur within or directly adjacent to the proposed area. These surveys shall be restricted to habitat types that could support special-status plant species that have the potential to occur within the proposed project's impact area, including the following plant species: ■ Plummer's mariposa lily ■ Mesa horkelia	MM4.3-7 Listed and Nonlisted Sensitive Plant Species. Due to potentially suitable habitat present within the project site for ~~two~~ eight ~~nonlisted~~ sensitive plant species, the project Applicant shall retain a qualified biologist or botanist to conduct a pre-construction survey of the area within the footprint of impact, and extended 50 feet outside of the impact area, as appropriate. The survey shall be conducted according to applicable CNPS and CDFG protocols, during the species blooming period or, if applicable and appropriate, immediately prior to the onset of project-related disturbances. The purpose of the pre-construction survey shall be to locate any special-status plant species that have a moderate or greater potential to occur within or directly adjacent to the proposed area of disturbance. These surveys shall be restricted to habitat types that could support special-status plant species that have the potential to occur within the proposed project's impact area, including the following plant species: ■ thread-leaved brodiaea ■ Plummer's mariposa lily ■ Parry's spineflower ■ slender-horned spineflower ■ Santa Ana River woollystar ■ Mesa horkelia ■ Robinson's pepper-grass ■ Parish's desert-thorn
MM4.3-8 Nonlisted Sensitive Wildlife Species. Due to potentially suitable habitat present within the project site for ten nonlisted sensitive wildlife species, the project Applicant shall retain a qualified biologist to conduct a pre-construction survey of the area within the footprint of impact, and extended 50 feet outside of the impact area. The survey shall be conducted according to any available CDFG protocols, prior to the onset of project-related disturbances. The purpose of the pre-construction survey shall be to locate any special-status wildlife species that have a moderate or greater potential to occur within or directly adjacent to the proposed project's impact area, and would not be mobile enough to avoid construction activities. These surveys shall including the following species:	MM4.3-8 Nonlisted Sensitive Wildlife Species. Due to potentially suitable habitat present within the project site for ten nonlisted sensitive wildlife species, the project Applicant shall retain a qualified biologist to conduct a pre-construction survey of the area within the footprint of impact, and extended 50 feet outside of the impact area, as appropriate. The survey shall be conducted according to any ~~available CDFG~~ required protocols, prior to the onset of project-related disturbances. The purpose of the pre-construction survey shall be to locate any special-status wildlife species that have a moderate or greater potential to occur within or directly adjacent to the proposed project's impact area, and would not be mobile enough to avoid construction activities. These surveys shall including the following species:

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Figures

Appendix A

Biological Update for the Palm/Industrial Distribution Center Project Site

Tables

November 27, 2012

Cardno ENTRIX
Shaping the Future

Table 1 Vegetation Communities in the Project Site

Vegetation Communities	Acreage as Identified in EIR	Revised Acreage
Coastal Sage Scrub	20.91	21.06
Disced/Bare Ground	13.79	14.49
Ruderal	3.15	3.18
Developed	N/A	0.53

Table 2: Corrected Biological Resources Mitigation Measures

Original Mitigation Measure	Revised Mitigation Measure
MM4.3-2 If California gnatcatcher or San Bernardino kangaroo rat is discovered to occupy the site, then to the extent feasible, habitat for these species shall be avoided through the establishment of a buffer area of 200 feet. Such areas shall be flagged, and encircled with an exclusionary fence. These areas shall be preserved in a conservation easement or other acceptable agreement with a USFWS and/or CDFG approved agency. Any such agreements shall be conducted in coordination with the USFWS and/or CDFG. If impacts on California gnatcatcher or San Bernardino kangaroo rat or their occupied habitat are unavoidable, then formal consultation with the USFWS pursuant to either Section 7 (with federal nexus) or Section 10 (without federal nexus) of FESA, and with CDFG pursuant to the CESA would be required. Specific mitigation measures would be developed as a part of the agency consultation, but would include a combination of on-site avoidance and preservation, and/or creation and preservation of off-site habitat, or payment into an off-site mitigation bank. The mitigation ratio for compensation of suitable habitat lost will not be less than 1:1, and an additional 1:1 for the loss of Critical Habitat.	MM4.3-2 If California gnatcatcher or San Bernardino kangaroo rat is discovered to occupy the site, then to the extent feasible, habitat for these species shall be avoided through the establishment of a buffer area of 200 feet. Such areas shall be flagged, and encircled with an exclusionary fence. These areas shall be preserved in a conservation easement or other acceptable agreement with a USFWS and/or CDFG approved agency. Any such agreements shall be conducted in coordination with the USFWS and/or CDFG. If impacts on California gnatcatcher or San Bernardino kangaroo rat or their ~~occupied~~ habitat are unavoidable, then formal consultation with the USFWS pursuant to either Section 7 (with federal nexus) or Section 10 (without federal nexus) of FESA, and with CDFG pursuant to the CESA would be required. Specific mitigation measures would be developed as a part of the agency consultation, but would include a combination of feasible on-site avoidance and preservation, and/or creation and preservation of off-site habitat, or payment into an off-site mitigation bank. The mitigation ratio for compensation of suitable habitat lost will not be less than 1:1~~, and an additional 1:1 for the loss of Critical Habitat~~.
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Figures

0 250 500 N

Scale in Feet

Legend

- Coastal Sage Scrub
- Developed
- Disced/Bare Ground
- Ruderal
- Project Boundary

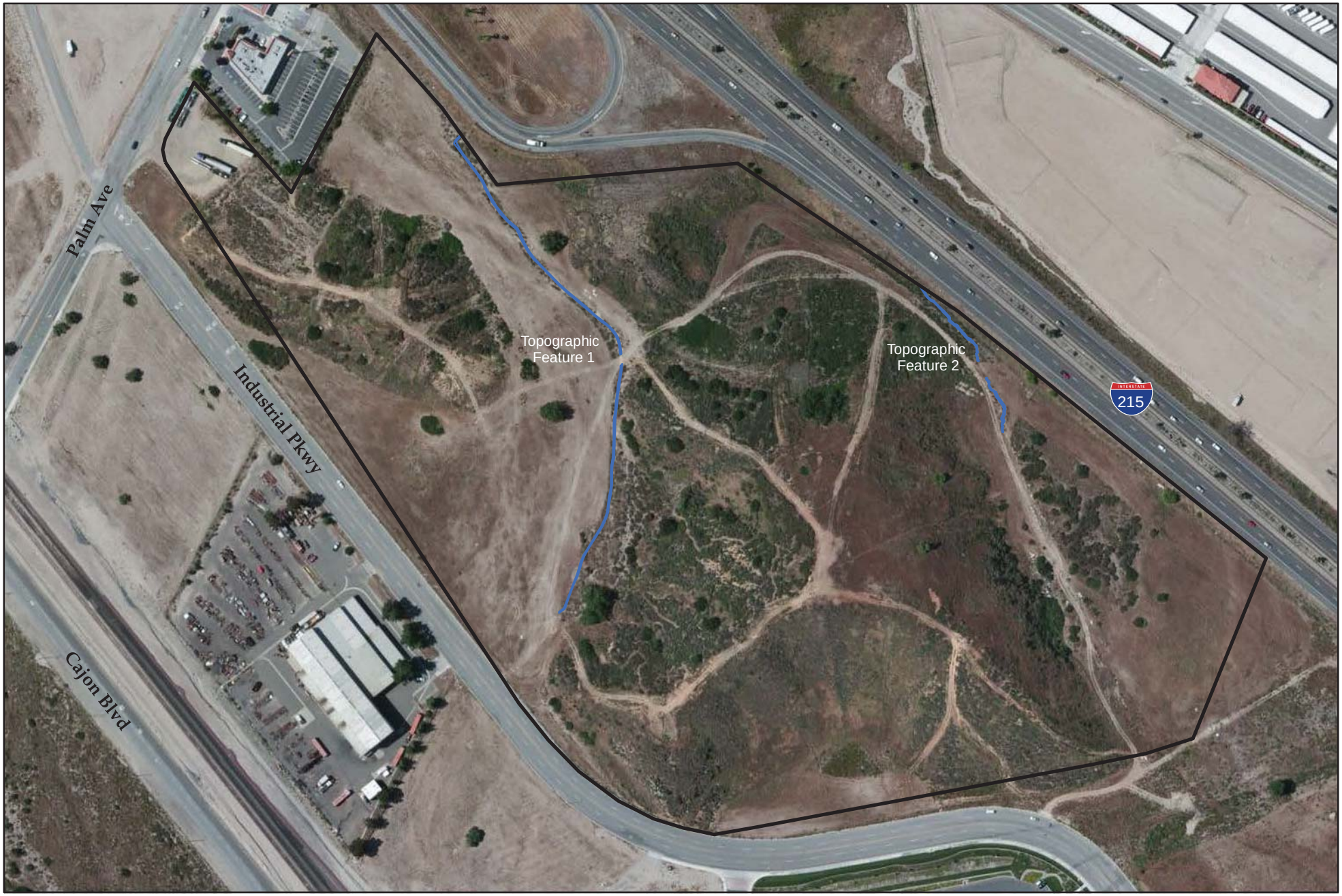
Cardno ENTRIX

Palm/Industrial Distribution Center

FIGURE 1

Vegetation Communities

Date: 11/21/2012



0 250 500
Scale in Feet

N

Legend

Topographic Feature (0.084 ac)

Project Boundary

Cardno ENTRIX

Palm/Industrial Distribution Center

FIGURE 2

Delineation of Topographic Features

Date: 11/21/2012

Appendix A

Biological Update for the Palm/Industrial Distribution Center Project Site

Technical Memorandum

Cardno ENTRIX
Shaping the Future

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Date November 21, 2012

To: Patrick Spillane
IDS Real Estate Group

cc: John Spranza, Cardno ENTRIX

From: May Lau

RE: **Biological Update for the Palm/Industrial Distribution Center Project Site**

1.0 Introduction

This technical memorandum presents the results of a biological field survey conducted on July 24, 2012 at the Palm/Industrial Distribution Center Project Site (Study Area) and consideration of recent literature/database review to address inconsistencies and innaccuracies in previously prepared biological reports (PBS&J 2007, 2010).

1.1 Site Location

The Study Area is located in the City of San Bernardino in San Bernardino County; specifically, on the south side of the intersection of Interstate 215 (I-215) and Palm Avenue within an unsectioned portion of Township 1 North, Range 5 West as shown on the San Bernardino North, California 7.5-minute series U.S. Geological Survey (USGS) topographic map. Figures 1 and 2 provide the regional and vicinity locations of the Study Area. All figures are provided at the end of the memorandum.

2.0 Methodology

A Cardno ENTRIX staff biologist conducted the biological field survey on July 24, 2012. The field survey was conducted on foot with 100% visual coverage and covered the entire Study Area, including all areas identified in the approved project site plan. The survey began at 1000 and concluded at 1330. Weather conditions were sunny with clear skies, and the air temperature was at 90 degrees Fahrenheit. Photographs and field notes were taken to document any species not previously recorded onsite and, consistent with the previously prepared biological reports, information from the following sources were used to identify potential sensitive biological resources in the area:

- California Natural Diversity Database (CNDDB) search for San Bernardino North and surrounding eight USGS quadrangles (CDFG 2012a)
- California Department of Fish and Game's (CDFG) Special Vascular Plants, Bryophytes, and Lichens List (October 2012)
- CDFG's List of State and Federally Listed Endangered and Threatened Animals of California (January 2011)
- CDFG's List of Special Animals (January 2011)
- Cardno ENTRIX. 2012. Jurisdictional Delineation of Wetlands and Waters Palm/Industrial Distribution Center. September.
- LSA Associates, Inc. 2012. Evaluation of Potential Jurisdictional Streambed Resources per Section 1602 of the California Fish and Game Code on a 39-Acre Parcel at Palm Avenue in the City of San Bernardino, San Bernardino County, November 19.

The species lists are provided in Appendix A. Blooming periods were taken from the California Native Plant Society (CNPS) Electronic Inventory of Rare and Endangered Plants of California (CNPS 2012).

3.0 Site Characteristics

The Study Area comprises an approximately 39-acre site that is currently vacant. It has two defining hill features within its boundaries that occupy approximately 35 percent of the property. The flat terrain of the Study Area is located between 1,640 and 1,680 feet above sea level (ASL), with the larger of the two hill features reaching 1,805 feet ASL. The majority of the flat terrain has been disced, and coastal sage scrub vegetation occurs in the northern and eastern portions of the site. A topographic feature enters the Study Area from under the I-215, at the northwest corner of the property, and travels in a southeasterly direction (through the center of the site), eventually dissipating at the western base of the larger of the two hill features.

4.0 Results

4.1 Vegetation

The habitats described in the Palm/Industrial Distribution Center Project Biological Report, October 2007 are predominantly the same in quantity and quality as observed during the 2012 biological survey. However, due to slight changes to the finalized project site plan, and in consideration of a wetland delineation conducted by Cardno ENTRIX in July 2012, slight changes to the acreages and classification of the habitats within the Study Area have been made, as shown in Table 1 and depicted in Figure 3.

Table 1: Vegetation Communities within the Study Area

Vegetation Communities	Acreage
Coastal Sage Scrub	21.06
Disced / Bare Ground	14.49
Ruderal	3.18
Developed	0.53
Total	**39.26**

The descriptions of the coastal sage scrub, disced, and ruderal habitats remain unchanged, with the exception of slight changes in acreage. Based on the July 2012 wetland delineation, the 0.51-acre "ephemeral wash" that was identified in the 2007 biological report is more characteristic of a topographic feature rather than a wash, as its function in water conveyance is very limitied to localized runoff, as further described below in Section 5.4. The vegetated portion consists of coastal sage scrub species, as accurately described in the 2007 biological report; therefore, the updated vegetation mapping depicts this as coastal sage scrub rather than a misidentified "ephemeral wash" (Figure 3). Several unvegetated, dirt roads were also misclassified as part of the coastal sage scrub community, and the vegetation mapping has been updated to change them to "disced/bare ground" (Figure 3). In addition, a small, developed area was also added to the project site, as described below.

4.2 Developed (0.53 acre)

The northwestern portion of the Study Area is developed as a vacant lot with dirt and gravel.

5.0 Special-Status Species and Habitats

Special-status species are defined as plants and animals that are legally protected under the following:

- Species listed, proposed, or candidate for listing as Threatened or Endangered by the USFWS pursuant to the federal Endangered Species Act of 1973 (FESA), as amended;
- Species listed as Rare, Threatened, or Endangered by the CDFG pursuant to the California Endangered Species Act of 1984 (CESA), as amended;
- Species designated as Fully Protected under Sections 3,511 (birds), 4,700 (mammals), and 5050 (reptiles and amphibians) of the California Fish and Game Code;
- Species designated by the CDFG as California Species of Special Concern; and

- Plant species listed as Category 1B and 2 by the CNPS; CNPS Category 3 and 4 species were not considered special-status species for the sake of this assessment, as they are not considered sufficiently rare on a regional level to warrant such status.

Based on the literature review, 20 special-status species were identified as having a moderate or higher potential of occurring within the Study Area, or reported by the CNDDB as occurring within the USGS 7.5-minute quadrangle map for the San Bernardino North and the eight surrounding quadrangles. None of these species were observed within the July 2012 general biological field survey.

The potential for a species to occur within the Study Area was based on the following criteria:

- Absent: Species was not observed during focused surveys conducted at an appropriate time for identification of the species, or species is restricted to habitats that do not occur within the project site.
- Low: No records exist of the species occurring within the project site or its vicinity, or habitats needed to support the species are of poor quality.
- Moderate: A historical record exists of the species within the vicinity of the project site (approximately five miles) and/or the habitat requirements associated with the species occur within the project site.
- High: Both a historical record exists of the species within the project site or its immediate vicinity (approximately one mile) and the habitat requirements associated with the species occur within the project site.
- Species Observed: The species was observed within the project site at the time of the survey.

5.1 Special-Status Plants

Taking into account the habitat, elevation, and blooming periods of each species, eight special-status plant species have a moderate or greater potential to occur within the Study Area.

- thread-leaved brodiaea (*Brodiaea filifolia*)
- Plummer‘s mariposa lily (*Calochortus plummerae*)
- Parry’s spineflower (*Chorizanthe parryi* var. *parryi*)
- slender-horned spineflower (*Dodecahema leptoceras*)
- Santa Ana River woollystar (*Eriastrum densifolium* ssp. *sanctorum*)
- mesa horkelia (*Horkelia cuneata* ssp. *puberula*)
- Robinson's pepper-grass (*Lepidium virginicum* var. *robinsonii*)

- Parish's desert-thorn (*Lycium parishii*)

It should also be noted that even though no sensitive plant species were observed within the Study Area, not all species within the site would have been in bloom at the time of the survey, and thus would not have been easily identifiable.

5.2 Special-Status Wildlife

Based on review of existing information, and in consideration of habitat preferences and known ranges of special-status species potentially occuring in the region, the following 12 special-status wildlife species have a moderate or greater potential to occur within the Study Area:

High Potential to Occur Based on Habitat:

- coastal California gnatcatcher (*Polioptila californica californica*)[1]
- northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*)
- San Bernardino kangaroo rat (*Dipodomys merriami parvus*)[2]
- San Diego desert woodrat (*Neotoma lepida intermedia*)
- Los Angeles pocket mouse (*Perognathus longimembris brevinasus*)
- coast horned lizard (*Phrynosoma blainvillii*)

Moderate Potential to Occur Based on Habitat:

- Bell's sage sparrow (*Amphispiza belli belli*)
- California horned lark (*Eremophila alpestris actia*)
- pallid San Diego pocket mouse (*Chaetodipus fallax pallidus*)
- San Diego black-tailed jackrabbit (*Lepus californicus bennettii*)
- orange-throated whiptail (*Aspidoscelis hyperythra*)
- rosy boa (*Charina trivirgata*)

[1] Not observed during 2012 USFWS protocol surveys (Appendix B).

[2] Not observed during 2012 USFWS protocol surveys (Appendix B).

5.3 Sensitive Habitats

None of the sensitive habitats reported to the CNDDB exist within the Study Area. However, the Study Area does support coastal sage scrub, a sensitive natural community that requires compensatory mitigation for temporary and permanent impacts.

In addition, the Study Area does not occur within any USFWS-designated critical habitat, including that which has been finalized by the USFWS for the coastal California gnatcatcher and San Bernardino kangaroo rat (USFWS 2012).

5.4 Potential Federal and State Jurisdictional Waters

5.4.1 Topographic Feature (0.08 acre)

5.4.1.1 Federal Waters

The project area contains two topographic features (Figure 4) that are unnamed and not identified on the San Bernardino North USGS topographic map. Historic (1938) aerial images of the site show remnants of stream channels crossing the site, but they have been cut off from the stream that was their apparent source decades ago by construction of a road now known as SR 206 / Kendall Drive. From surveys of the features, it appears that they intercept localized stormwater sheetflow from portions of the project site and roadway runoff from adjacent portions of I-215 and Palm Avenue (Figure 4).

The topographic features were delineated in accordance with the 1987 Corps of Engineers Wetlands Delineation Manual and do not contain an Ordinary High Water Mark (OHWM) nor does it meet the Clean Water Act (CWA) definition of "other waters" of the U.S (Cardno ENTRIX 2012). Therefore, based on the results of the jurisdictional delineation, the entire approximately 39-acre Study Area, including the delineated topographic features, do not appear to fall under the regulatory authority of the U.S. Army Corps of Engineers (Corps) or the Santa Ana Regional Water Quality Control Board (RWQCB) per Sections 404 and 401 of the CWA.

A request for an approved jurisdictional determination from the Corps has been made to verify that a Section 404 CWA permit is not required.

5.4.1.2 State Waters: Porter-Cologne Act and CDFG Jurisdiction

The Porter-Cologne Act is the principal law governing water quality in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. Unlike the Clean Water Act, Porter-Cologne applies to both surface water and ground water. An August 10, 2012 consultation with the Santa Ana Regional Water Quality Control Board (RWQCB) confirmed that the delineated features are not subject to the jurisdiction of the RWQCB pursuant to the Porter-Cologne Water Quality Control Act.[3] Mark Adelson Chief, Regional Planning Programs Section of the Santa Ana RWQCB concluded that no Report of Waste Discharge or Waste Discharge Requirements are required for this project. The basis for the conclusion was that other than ground water recharge, the site does not appear

[3] Adelson, Mark. 2012. Personal communication via email with the Santa Ana Regional Water Quality Control Board. August 10.

to support any water quality beneficial uses recognized by the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan).[4]

The CDFG, through provisions of the California Fish and Game Code (Sec. 1600 et seq.), is empowered to issue agreements for any substantial alteration of a river, stream, or lake where fish or wildlife resources may be substantially adversely affected. The term stream, which includes creeks and rivers, is defined in Title 14 of the California Code of Regulations, Section 1.72: *A stream is a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports or has supported riparian vegetation*.

The CDFG's Streambed Alteration Program, as administrated per Section 1602 requires an entity to notify the CDFG of any proposed activity that may substantially modify a river, stream, or lake. Specifically, notification is required by any person, business, state or local government agency, or public utility that proposes an activity that will:

- substantially divert or obstruct the natural flow of any river, stream or lake;
- substantially change or use any material from the bed, channel, or bank of, any river,
- stream, or lake; or
- deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake.

The notification requirement applies to any work undertaken in or near a river, stream, or lake that flows at least intermittently through a bed or channel.

Two independent surveys of the Study Area were performed to assess the topographical features for potential jurisdiction under 1602, one during the dry season (Cardno ENTRIX 2012) and one during the wet season (LSA Associates 2012; Appendix C). Results of both surveys concluded that the two features (Topographic Feature 1 and Topographic Feature 2; Figure 4) do not contain the required elements of a stream that would necessitate the need for a Streambed Agreement under Section 1602 (i.e., sediment deposits and debris lines, Photographs 1 through 5).[5] Specifically, there are a few isolated locations where erosion has taken place, creating a shallow shelf that resembles a bank. However, these areas are very short, discontinuous, and infrequent sections of the overall length of the features, which otherwise show no discernible evidence of defined bed and banks. Some minor scour was observed along Topographic Feature 1, where stormwater from I-215 enters the site, presumably a result of localized runoff. Neither feature connects to another stream or channel in the project vicinity. In fact, both features dissipate onto flat surfaces within the Study Area and do not reappear (Photograph 3 and 5). No standing or flowing water was observed in any survey dating back to 2007, nor was any groundwater or moist soil

[4] Adelson, Mark. 2012. Personal communication via email with the Santa Ana Regional Water Quality Control Board. August 10.

[5] All jurisdictional determinations and/or opinions are subject to review and verification by the appropriate regulatory agencies.

encountered when excavating pits during the 2012 delineation performed for the Corps. No riparian vegetation is associated with this feature, and all vegetation is upland species typical of the ruderal and sage communities found on site.

The characteristics of these two features are incompatible with the channel features typical of those found in streams. Consequently, as the features do not have a defined bed or bank, riparian vegetation or aquatic habitat, these topographical features do not contain the essential elements of a stream as defined in Title 14 of the California Code of Regulations, Section 1.72, and would not require a Streambed Agreement pursuant to Section 1600 of the California Fish and Game Code. [6]

Photograph 1: Looking north down the middle of Topographic Feature 2

[6] All jurisdictional determinations and/or opinions are subject to review and verification by the appropriate regulatory agencies.

Photograph 2: Looking north at the upper portion of Topographic Feature 2.

Photograph 3: Looking southeast at Topographic Feature 1 on 11-5-12.

Photograph 4: Looking north at Topographic Feature 1 along the northern-central boundary of the site (11-5-12).

Phtograph 5: Landscape perspective of the section of Topographic Feature 1 contained in Photograph 4 (11-5-12)

6.0 Conclusion

Based on the updated literature/database review and 2012 field surveys, the following updated information is provided regarding biological resources:

- Vegetation community types and acreages as identified in Table 1 and Figure 3.
- Recent focused surveys conducted by LSA Associates in May and June of 2012 for coastal California gnatcatcher and San Bernardino kangaroo rat yielded negative results, but did reveal the presence of Los Angeles pocket mouse, northwestern San Diego pocket mouse, and San Diego woodrat onsite. These reports are provided in Appendix B. There are no new identified wildlife species that were not previously addressed in the 2007 biological report.
- The presence or absence of six sensitive plant species that were not previously identified in the 2007 biological report as having a moderate or greater potential of occurrence onsite would be determined during preconstruction floristic surveys (which would be required under the mitigation proposed per the project's Environmental Impact Report).
- Revision of the potential jurisdictional nature of the two topographical features.

7.0 References

California Department of Fish and Game (CDFG) Biogeographic Data Branch. 2011a. Special Animals List. January.

Cardno ENTRIX. 2012. Jurisdictional Delineation of Wetlands and Waters Palm/Industrial Distribution Center. September.

CDFG. 2011b. List of State and Federally Listed Endangered and Threatened Animals of California. January.

CDFG Biogeographic Data Branch. 2012a. California Natural Diversity Database. Commercial Version - Dated September 1, 2012.

CDFG, Natural Diversity Database. 2012b. Special Vascular Plants, Bryophytes, and Lichens List. October.

California Native Plant Society (CNPS). 2012. Inventory of Rare and Endangered Plants (online edition, v8-01a). California Native Plant Society.

LSA Associates, Inc. 2012. Results of Focused California Gnatcatcher Breeding Season Survey on the Palm/Industrial Distribution Center Project Site. July 9.

LSA Associates, Inc. 2012. San Bernardino Kangaroo Rat Survey for a 35-Acre Parcel in the City of San Bernardino, San Bernardino County, June 24-29, 2012. July 19.

LSA Associates, Inc. 2012. Evaluation of Potential Jurisdictional Streambed Resources per Section 1602 of the California Fish and Game Code on a 39-Acre Parcel at Palm Avenue in the City of San Bernardino, San Bernardino County. November 19.

PBS&J. 2007. Palm/Industrial Distribution Center Project Biological Technical Report. October.

PBS&J. 2010. Memorandum: Field Surveys to Confirm Existing Conditions at Palm/Industrial Distribution Center Project, San Bernardino County, CA. October 2.

United States Fish and Wildlife Service. 2012. Critical Habitat Portal. Available online: http://criticalhabitat.fws.gov/crithab/. Accessed August 7.

Appendix C Army Corps of Engineers Verification

DEPARTMENT OF THE ARMY

January 11, 2013

REPLY TO
ATTENTION OF

Regulatory Division

May Lau
Cardno Entrix
10940 Wilshire Blvd Suite 1525
Los Angeles, California 90024

SUBJECT: Approved Jurisdictional Determination regarding presence/absence of geographic jurisdiction

Dear Ms. Lau:

Reference is made to your request (File No. SPL-2012-00671-BEM) received September 14, 2012, for an approved Department of the Army jurisdictional determination (JD) for the Palm/Industrial Distribution Center project site located on the south side of the intersection of Interstate 215 and Palm Avenue within the city of San Bernardino, San Bernardino County, California (see Location Map in Attachment A).

As you may know, the Corps' evaluation process for determining whether or not a Department of the Army permit is needed involves two tests. If both tests are met, then a permit is required. The first test determines whether or not the proposed project is located in a water of the United States (i.e., it is within the Corps' geographic jurisdiction). The second test determines whether or not the proposed project is a regulated activity under Section 10 of the River and Harbor Act or Section 404 of the Clean Water Act. As part of the evaluation process, pertaining to the first test only, we have made the jurisdictional determination below.

Based on available information, we have determined there are no waters of the United States on the project site, in the locations depicted on the enclosed drawing. The basis for our determination can be found in the enclosed JD form(s) (Attachment B).

The aquatic resources identified as "TF1A and TF1B" on the attached drawing (Attachment C) are intrastate isolated waters with no apparent interstate or foreign commerce connection. As such, these waters are not currently regulated by the Corps of Engineers. This disclaimer of jurisdiction is only for Section 404 of the Clean Water Act. Other Federal, State, and local laws may apply to your activities. In particular, you may need authorization from the California State Water Resources Control Board and/or the U.S. Fish and Wildlife Service.

This letter contains an approved jurisdictional determination for the Palm/Industrial Distribution Center project site. If you object to this decision, you may request an administrative appeal under Corps regulations at 33 CFR Part 331. Enclosed you will find a Notification of Appeal Process (NAP) fact sheet (Attachment D) and Request for Appeal (RFA) form (Attachment E). If you request to appeal this decision you must submit a completed RFA form to the Corps South Pacific Division Office at the following address:

Tom Cavanaugh
Administrative Appeal Review Officer,
U.S. Army Corps of Engineers
South Pacific Division, CESPD-PDS-O, 2042B
1455 Market Street, San Francisco, California 94103-1399

In order for an RFA to be accepted by the Corps, the Corps must determine that it is complete, that it meets the criteria for appeal under 33 C.F.R. Part 331.5, and that it has been received by the Division Office within 60 days of the date on the NAP. Should you decide to submit an RFA form, it must be received at the above address by March 12, 2013. It is not necessary to submit an RFA form to the Division office if you do not object to the decision in this letter.

This verification is valid for five years from the date of this letter, unless new information warrants revision of the determination before the expiration date. If you wish to submit new information regarding the approved jurisdictional determination for this site, please submit this information to Brianne McGuffie at the letterhead address by March 12, 2013. The Corps will consider any new information so submitted and respond within 60 days by either revising the prior determination, if appropriate, or reissuing the prior determination. A revised or reissued jurisdictional determination can be appealed as described above.

This determination has been conducted to identify the extent of the Corps' Clean Water Act jurisdiction on the particular project site identified in your request. This determination may not be valid for the wetland conservation provisions of the Food Security Act of 1985. If you or your tenant are USDA program participants, or anticipate participation in USDA programs, you should request a certified wetland determination from the local office of the Natural Resources Conservation Service, prior to starting work.

If you have any questions, please contact Brianne Mcguffie of my staff at 213-452-3419 or via e-mail at Brianne.E.McGuffie@usace.army.mil.

Please be advised that you can now comment on your experience with Regulatory Division by accessing the Corps web-based customer survey form at: http://per2.nwp.usace.army.mil/survey.html.

Sincerely,

SWENSON.DANIEL.PATTERSON.1081348363

Digitally signed by SWENSON.DANIEL.PATTERSON.1081348363
DN: c=US, o=U.S. Government, ou=DoD, ou=PKI, ou=USA, cn=SWENSON.DANIEL.PATTERSON.1081348363
Date: 2013.01.11 15:40:54 -08'00'

Daniel P. Swenson, D. Env.
Chief, L.A. & San Bernardino Section
North Coast Branch
Regulatory Division

Copy To:
Palm Avenue SB, LLC.

Attachments:

Attachment A: Location Map
Attachment B: JD Drawing
Attachment C: Approved JD Form and associated JD report
Attachment D: NFA Fact Sheet
Attachment E: RFA Form

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ATTACHMENT A

0 2,500 5,000

Scale in Feet

N

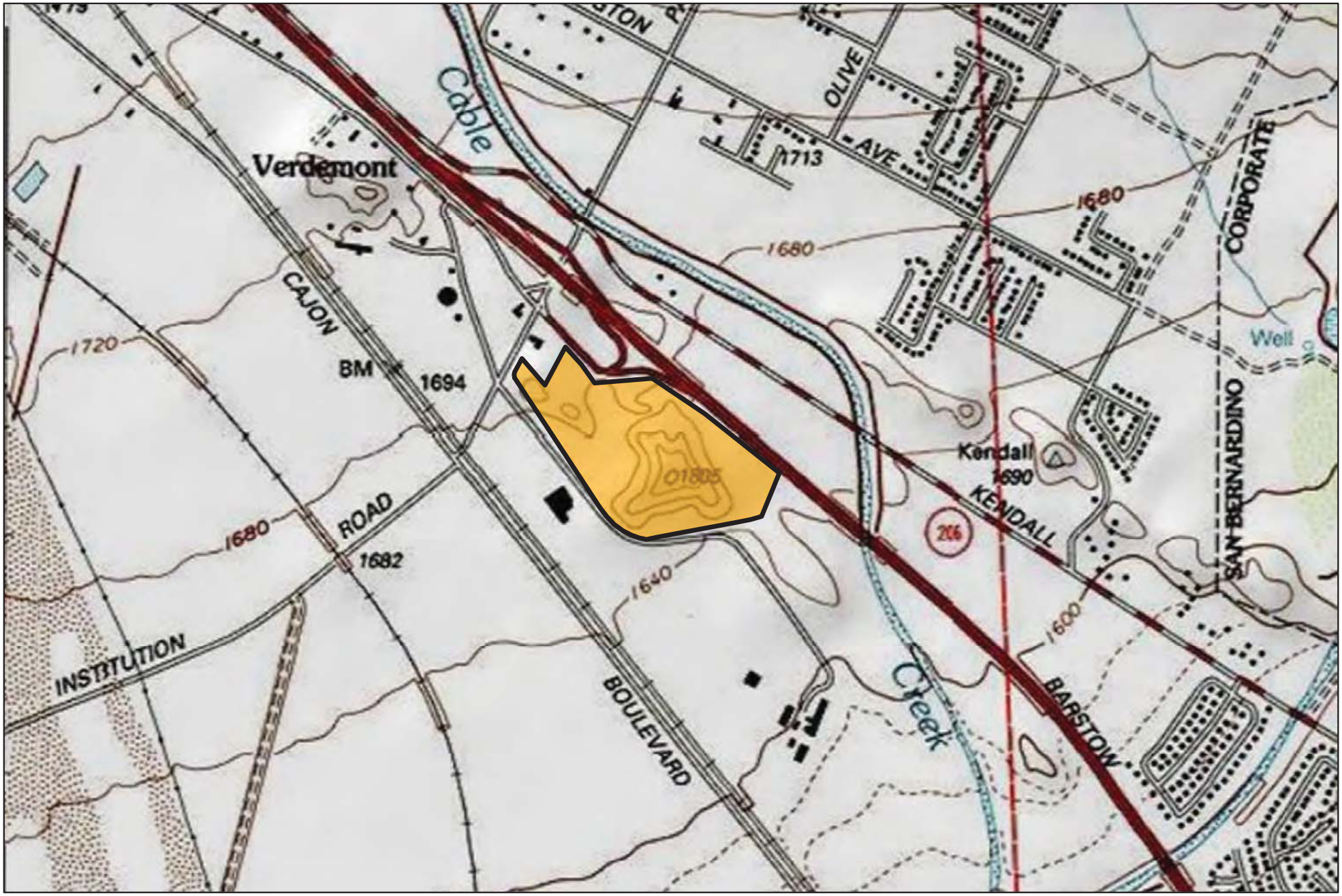
Palm/Industrial Distribution Center

FIGURE 1

Regional Location Map

Cardno ENTRIX

Date: 9/5/2012



0 500 1,000
Scale in Feet

N

Legend

Project Boundary

Palm/Industrial Distribution Center

FIGURE 2
Site Vicinity Map

Date: 9/5/2012

Cardno ENTRIX

ATTACHMENT B

APPROVED JURISDICTIONAL DETERMINATION FORM
U.S. Army Corps of Engineers

This form should be completed by following the instructions provided in Section IV of the JD Form Instructional Guidebook.

SECTION I: BACKGROUND INFORMATION

A. REPORT COMPLETION DATE FOR APPROVED JURISDICTIONAL DETERMINATION (JD): January 7, 2013

B. DISTRICT OFFICE, FILE NAME, AND NUMBER: Los Angeles District, Palm Avenue SB, LLC, "Palm Industrial Distribution Center", SPL-2012-00671(JD-BEM)

C. PROJECT LOCATION AND BACKGROUND INFORMATION:

State: California County/parish/borough: San Bernardino City: San Bernardino
Center coordinates of site (lat/long in degree decimal format): Lat. 34.187419 °**N**, Long. -117.359186 °**W**.
Universal Transverse Mercator:
Name of nearest waterbody: Cajon Wash
Name of nearest Traditional Navigable Water (TNW) into which the aquatic resource flows: N/A
Name of watershed or Hydrologic Unit Code Santa Ana Watershed (8 digit HUC: 18070203)
☒ Check if map/diagram of review area and/or potential jurisdictional areas is/are available upon request.
☐ Check if other sites (e.g., offsite mitigation sites, disposal sites, etc…) are associated with this action and are recorded on a different JD form.

D. REVIEW PERFORMED FOR SITE EVALUATION (CHECK ALL THAT APPLY):
☒ Office (Desk) Determination. Date: December 18, 2012
☐ Field Determination. Date(s):

SECTION II: SUMMARY OF FINDINGS

A. RHA SECTION 10 DETERMINATION OF JURISDICTION.

There **Are no** *"navigable waters of the U.S."* within Rivers and Harbors Act (RHA) jurisdiction (as defined by 33 CFR part 329) in the review area. [*Required*]
☐ Waters subject to the ebb and flow of the tide.
☐ Waters are presently used, or have been used in the past, or may be susceptible for use to transport interstate or foreign commerce.
Explain: .

B. CWA SECTION 404 DETERMINATION OF JURISDICTION.

There **Are no** "*waters of the U.S.*" within Clean Water Act (CWA) jurisdiction (as defined by 33 CFR part 328) in the review area. [*Required*]

1. **Waters of the U.S.**
   a. **Indicate presence of waters of U.S. in review area (check all that apply):** [1]
   ☐ TNWs, including territorial seas
   ☐ Wetlands adjacent to TNWs
   ☐ Relatively permanent waters[2] (RPWs) that flow directly or indirectly into TNWs
   ☐ Non-RPWs that flow directly or indirectly into TNWs
   ☐ Wetlands directly abutting RPWs that flow directly or indirectly into TNWs
   ☐ Wetlands adjacent to but not directly abutting RPWs that flow directly or indirectly into TNWs
   ☐ Wetlands adjacent to non-RPWs that flow directly or indirectly into TNWs
   ☐ Impoundments of jurisdictional waters
   ☐ Isolated (interstate or intrastate) waters, including isolated wetlands

   b. **Identify (estimate) size of waters of the U.S. in the review area:**
   Non-wetland waters: linear feet: width (ft) and/or acres.
   Wetlands: acres.

   c. **Limits (boundaries) of jurisdiction** based on: **1987 Delineation Manual**
   Elevation of established OHWM (if known): .

2. **Non-regulated waters/wetlands (check if applicable):**[3]
   ☒ Potentially jurisdictional waters and/or wetlands were assessed within the review area and determined to be not jurisdictional. Explain:. **The potentially jurisdictional areas of the 38.4 acre site total approximately 0.727 acre of drainage that convey urban runoff and precipitation during high flow events via overland sheet flow (see attached Figure 4) . The primary topographic feature/drainage (TF-1A) enters the Study Area at the northwest corner of the property, and**

---

[1] Boxes checked below shall be supported by completing the appropriate sections in Section III below.
[2] For purposes of this form, an RPW is defined as a tributary that is not a TNW and that typically flows year-round or has continuous flow at least "seasonally" (e.g., typically 3 months).
[3] Supporting documentation is presented in Section III.F.

travels in a southeasterly direction eventually dissipating at the western base of the larger of the two hill features located in the project area. A portion of this feature also branches out in an easterly direction along the northern boundary outside of the project boundary (TF-1B) and re-enters the project area along the north-central boundary before also dissipating on site. Based on information provided by the applicant in the jurisdictional delineation report ("Jurisdictional Delineation of Wetlands and Waters, Palm/Industrial Distribution Center", Cardno Entrix, September 2012) as well as an aerial review of the subject site, the Corps has determined that the existing drainage features/waters within the project area (TF-1A and TF-1B in Figure 4) do not have a hydrologic connection to jurisdictional waters and are isolated. Additionally, based on a review of current aerial imagery and submitted information, there is no current, on-site surface water-related interstate commerce. Based on the above information, the Corps has determined that pursuant to the Supreme Court decision in the Solid Waste Authority of Northern Cook County vs. U.S. Army Corps of Engineers (SWANCC), these waters are not jurisdictional.

SECTION III: CWA ANALYSIS

A. TNWs AND WETLANDS ADJACENT TO TNWs

The agencies will assert jurisdiction over TNWs and wetlands adjacent to TNWs. If the aquatic resource is a TNW, complete Section III.A.1 and Section III.D.1. only; if the aquatic resource is a wetland adjacent to a TNW, complete Sections III.A.1 and 2 and Section III.D.1.; otherwise, see Section III.B below.

1. TNW
Identify TNW: .

Summarize rationale supporting determination: .

2. Wetland adjacent to TNW
Summarize rationale supporting conclusion that wetland is "adjacent": .

B. CHARACTERISTICS OF TRIBUTARY (THAT IS NOT A TNW) AND ITS ADJACENT WETLANDS (IF ANY):

This section summarizes information regarding characteristics of the tributary and its adjacent wetlands, if any, and it helps determine whether or not the standards for jurisdiction established under *Rapanos* have been met.

The agencies will assert jurisdiction over non-navigable tributaries of TNWs where the tributaries are "relatively permanent waters" (RPWs), i.e. tributaries that typically flow year-round or have continuous flow at least seasonally (e.g., typically 3 months). A wetland that directly abuts an RPW is also jurisdictional. If the aquatic resource is not a TNW, but has year-round (perennial) flow, skip to Section III.D.2. If the aquatic resource is a wetland directly abutting a tributary with perennial flow, skip to Section III.D.4.

A wetland that is adjacent to but that does not directly abut an RPW requires a significant nexus evaluation. Corps districts and EPA regions will include in the record any available information that documents the existence of a significant nexus between a relatively permanent tributary that is not perennial (and its adjacent wetlands if any) and a traditional navigable water, even though a significant nexus finding is not required as a matter of law.

If the waterbody[4] is not an RPW, or a wetland directly abutting an RPW, a JD will require additional data to determine if the waterbody has a significant nexus with a TNW. If the tributary has adjacent wetlands, the significant nexus evaluation must consider the tributary in combination with all of its adjacent wetlands. This significant nexus evaluation that combines, for analytical purposes, the tributary and all of its adjacent wetlands is used whether the review area identified in the JD request is the tributary, or its adjacent wetlands, or both. If the JD covers a tributary with adjacent wetlands, complete Section III.B.1 for the tributary, Section III.B.2 for any onsite wetlands, and Section III.B.3 for all wetlands adjacent to that tributary, both onsite and offsite. The determination whether a significant nexus exists is determined in Section III.C below.

1. Characteristics of non-TNWs that flow directly or indirectly into TNW

(i) General Area Conditions:
Watershed size: **Pick List**
Drainage area: **Pick List**
Average annual rainfall: inches
Average annual snowfall: inches

(ii) Physical Characteristics:
(a) Relationship with TNW:

[4] Note that the Instructional Guidebook contains additional information regarding swales, ditches, washes, and erosional features generally and in the arid West.

☐ Tributary flows directly into TNW.
☐ Tributary flows through **Pick List** tributaries before entering TNW.

Project waters are **Pick List** river miles from TNW.
Project waters are **Pick List** river miles from RPW.
Project waters are **Pick List** aerial (straight) miles from TNW.
Project waters are **Pick List** aerial (straight) miles from RPW.
Project waters cross or serve as state boundaries. Explain: .

Identify flow route to TNW[5]: .
Tributary stream order, if known: .

(b) General Tributary Characteristics (check all that apply):
Tributary is: ☐ Natural
☐ Artificial (man-made). Explain: .
☐ Manipulated (man-altered). Explain: .

Tributary properties with respect to top of bank (estimate):
Average width: feet
Average depth: feet
Average side slopes: **Pick List.**

Primary tributary substrate composition (check all that apply):
☐ Silts ☐ Sands ☐ Concrete
☐ Cobbles ☐ Gravel ☐ Muck
☐ Bedrock ☐ Vegetation. Type/% cover:
☐ Other. Explain: .

Tributary condition/stability [e.g., highly eroding, sloughing banks]. Explain: .
Presence of run/riffle/pool complexes. Explain: .
Tributary geometry: **Pick List**
Tributary gradient (approximate average slope): %

(c) Flow:
Tributary provides for: **Pick List**
Estimate average number of flow events in review area/year: **Pick List**
Describe flow regime: .
Other information on duration and volume: .

Surface flow is: **Pick List.** Characteristics: .

Subsurface flow: **Pick List**. Explain findings: .
☐ Dye (or other) test performed: .

Tributary has (check all that apply):
☐ Bed and banks
☐ OHWM[6] (check all indicators that apply):
☐ clear, natural line impressed on the bank
☐ changes in the character of soil
☐ shelving
☐ vegetation matted down, bent, or absent
☐ leaf litter disturbed or washed away
☐ sediment deposition
☐ water staining
☐ other (list):
☐ the presence of litter and debris
☐ destruction of terrestrial vegetation
☐ the presence of wrack line
☐ sediment sorting
☐ scour
☐ multiple observed or predicted flow events
☐ abrupt change in plant community
☐ Discontinuous OHWM.[7] Explain: .

If factors other than the OHWM were used to determine lateral extent of CWA jurisdiction (check all that apply):
☐ High Tide Line indicated by:
☐ oil or scum line along shore objects
☐ Mean High Water Mark indicated by:
☐ survey to available datum;

[5] Flow route can be described by identifying, e.g., tributary a, which flows through the review area, to flow into tributary b, which then flows into TNW.
[6] A natural or man-made discontinuity in the OHWM does not necessarily sever jurisdiction (e.g., where the stream temporarily flows underground, or where the OHWM has been removed by development or agricultural practices). Where there is a break in the OHWM that is unrelated to the waterbody's flow regime (e.g., flow over a rock outcrop or through a culvert), the agencies will look for indicators of flow above and below the break.
[7] Ibid.

☐ fine shell or debris deposits (foreshore)
☐ physical markings/characteristics
☐ tidal gauges
☐ other (list):
☐ physical markings;
☐ vegetation lines/changes in vegetation types.

(iii) Chemical Characteristics:
Characterize tributary (e.g., water color is clear, discolored, oily film; water quality; general watershed characteristics, etc.).
Explain: .
Identify specific pollutants, if known: .

(iv) Biological Characteristics. Channel supports (check all that apply):
☐ Riparian corridor. Characteristics (type, average width): .
☐ Wetland fringe. Characteristics: .
☐ Habitat for:
☐ Federally Listed species. Explain findings: .
☐ Fish/spawn areas. Explain findings: .
☐ Other environmentally-sensitive species. Explain findings: .
☐ Aquatic/wildlife diversity. Explain findings: .

2. Characteristics of wetlands adjacent to non-TNW that flow directly or indirectly into TNW

(i) Physical Characteristics:
(a) General Wetland Characteristics:
Properties:
Wetland size: acres
Wetland type. Explain: .
Wetland quality. Explain: .
Project wetlands cross or serve as state boundaries. Explain: .

(b) General Flow Relationship with Non-TNW:
Flow is: **Pick List**. Explain: .

Surface flow is**: Pick List**
Characteristics: .

Subsurface flow: **Pick List**. Explain findings: .
☐ Dye (or other) test performed: .

(c) Wetland Adjacency Determination with Non-TNW:
☐ Directly abutting
☐ Not directly abutting
☐ Discrete wetland hydrologic connection. Explain: .
☐ Ecological connection. Explain: .
☐ Separated by berm/barrier. Explain: .

(d) Proximity (Relationship) to TNW
Project wetlands are **Pick List** river miles from TNW.
Project waters are **Pick List** aerial (straight) miles from TNW.
Flow is from: **Pick List.**
Estimate approximate location of wetland as within the **Pick List** floodplain.

(ii) Chemical Characteristics:
Characterize wetland system (e.g., water color is clear, brown, oil film on surface; water quality; general watershed characteristics; etc.). Explain: .
Identify specific pollutants, if known: .

(iii) Biological Characteristics. Wetland supports (check all that apply):
☐ Riparian buffer. Characteristics (type, average width): .
☐ Vegetation type/percent cover. Explain: .
☐ Habitat for:
☐ Federally Listed species. Explain findings: .
☐ Fish/spawn areas. Explain findings: .
☐ Other environmentally-sensitive species. Explain findings: .
☐ Aquatic/wildlife diversity. Explain findings: .

3. Characteristics of all wetlands adjacent to the tributary (if any)

All wetland(s) being considered in the cumulative analysis: **Pick List**
Approximately ( ) acres in total are being considered in the cumulative analysis.
For each wetland, specify the following:

Directly abuts? (Y/N)	Size (in acres)	Directly abuts? (Y/N)	Size (in acres)

Summarize overall biological, chemical and physical functions being performed: .

C. SIGNIFICANT NEXUS DETERMINATION

A significant nexus analysis will assess the flow characteristics and functions of the tributary itself and the functions performed by any wetlands adjacent to the tributary to determine if they significantly affect the chemical, physical, and biological integrity of a TNW. For each of the following situations, a significant nexus exists if the tributary, in combination with all of its adjacent wetlands, has more than a speculative or insubstantial effect on the chemical, physical and/or biological integrity of a TNW. Considerations when evaluating significant nexus include, but are not limited to the volume, duration, and frequency of the flow of water in the tributary and its proximity to a TNW, and the functions performed by the tributary and all its adjacent wetlands. It is not appropriate to determine significant nexus based solely on any specific threshold of distance (e.g. between a tributary and its adjacent wetland or between a tributary and the TNW). Similarly, the fact an adjacent wetland lies within or outside of a floodplain is not solely determinative of significant nexus.

Draw connections between the features documented and the effects on the TNW, as identified in the *Rapanos* Guidance and discussed in the Instructional Guidebook. Factors to consider include, for example:

- Does the tributary, in combination with its adjacent wetlands (if any), have the capacity to carry pollutants or flood waters to TNWs, or to reduce the amount of pollutants or flood waters reaching a TNW?
- Does the tributary, in combination with its adjacent wetlands (if any), provide habitat and lifecycle support functions for fish and other species, such as feeding, nesting, spawning, or rearing young for species that are present in the TNW?
- Does the tributary, in combination with its adjacent wetlands (if any), have the capacity to transfer nutrients and organic carbon that support downstream foodwebs?
- Does the tributary, in combination with its adjacent wetlands (if any), have other relationships to the physical, chemical, or biological integrity of the TNW?

Note: the above list of considerations is not inclusive and other functions observed or known to occur should be documented below:

1. **Significant nexus findings for non-RPW that has no adjacent wetlands and flows directly or indirectly into TNWs.** Explain findings of presence or absence of significant nexus below, based on the tributary itself, then go to Section III.D: .

2. **Significant nexus findings for non-RPW and its adjacent wetlands, where the non-RPW flows directly or indirectly into TNWs.** Explain findings of presence or absence of significant nexus below, based on the tributary in combination with all of its adjacent wetlands, then go to Section III.D: .

3. **Significant nexus findings for wetlands adjacent to an RPW but that do not directly abut the RPW.** Explain findings of presence or absence of significant nexus below, based on the tributary in combination with all of its adjacent wetlands, then go to Section III.D: .

D. DETERMINATIONS OF JURISDICTIONAL FINDINGS. THE SUBJECT WATERS/WETLANDS ARE (CHECK ALL THAT APPLY):

1. **TNWs and Adjacent Wetlands.** Check all that apply and provide size estimates in review area:
   ☐ TNWs: linear feet width (ft), Or, acres.
   ☐ Wetlands adjacent to TNWs: acres.

2. **RPWs that flow directly or indirectly into TNWs.**
   ☐ Tributaries of TNWs where tributaries typically flow year-round are jurisdictional. Provide data and rationale indicating that tributary is perennial: .
   ☐ Tributaries of TNW where tributaries have continuous flow "seasonally" (e.g., typically three months each year) are jurisdictional. Data supporting this conclusion is provided at Section III.B. Provide rationale indicating that tributary flows seasonally: .

Provide estimates for jurisdictional waters in the review area (check all that apply):
☐ Tributary waters: linear feet width (ft).
☐ Other non-wetland waters: acres.
Identify type(s) of waters: .

3. **Non-RPWs[8] that flow directly or indirectly into TNWs.**
☐ Waterbody that is not a TNW or an RPW, but flows directly or indirectly into a TNW, and it has a significant nexus with a TNW is jurisdictional. Data supporting this conclusion is provided at Section III.C.

Provide estimates for jurisdictional waters within the review area (check all that apply):
☐ Tributary waters: linear feet width (ft).
☐ Other non-wetland waters: acres.
Identify type(s) of waters: **.**

4. **Wetlands directly abutting an RPW that flow directly or indirectly into TNWs.**
☐ Wetlands directly abut RPW and thus are jurisdictional as adjacent wetlands.
☐ Wetlands directly abutting an RPW where tributaries typically flow year-round. Provide data and rationale indicating that tributary is perennial in Section III.D.2, above. Provide rationale indicating that wetland is directly abutting an RPW: **.**

☐ Wetlands directly abutting an RPW where tributaries typically flow "seasonally." Provide data indicating that tributary is seasonal in Section III.B and rationale in Section III.D.2, above. Provide rationale indicating that wetland is directly abutting an RPW: .

Provide acreage estimates for jurisdictional wetlands in the review area: acres.

5. **Wetlands adjacent to but not directly abutting an RPW that flow directly or indirectly into TNWs.**
☐ Wetlands that do not directly abut an RPW, but when considered in combination with the tributary to which they are adjacent and with similarly situated adjacent wetlands, have a significant nexus with a TNW are jurisidictional. Data supporting this conclusion is provided at Section III.C.

Provide acreage estimates for jurisdictional wetlands in the review area: acres.

6. **Wetlands adjacent to non-RPWs that flow directly or indirectly into TNWs.**
☐ Wetlands adjacent to such waters, and have when considered in combination with the tributary to which they are adjacent and with similarly situated adjacent wetlands, have a significant nexus with a TNW are jurisdictional. Data supporting this conclusion is provided at Section III.C.

Provide estimates for jurisdictional wetlands in the review area: acres.

7. **Impoundments of jurisdictional waters.[9]**
As a general rule, the impoundment of a jurisdictional tributary remains jurisdictional.
☐ Demonstrate that impoundment was created from "waters of the U.S.," or
☐ Demonstrate that water meets the criteria for one of the categories presented above (1-6), or
☐ Demonstrate that water is isolated with a nexus to commerce (see E below).

E. ISOLATED [INTERSTATE OR INTRA-STATE] WATERS, INCLUDING ISOLATED WETLANDS, THE USE, DEGRADATION OR DESTRUCTION OF WHICH COULD AFFECT INTERSTATE COMMERCE, INCLUDING ANY SUCH WATERS (CHECK ALL THAT APPLY):[10]
☐ which are or could be used by interstate or foreign travelers for recreational or other purposes.
☐ from which fish or shellfish are or could be taken and sold in interstate or foreign commerce.
☐ which are or could be used for industrial purposes by industries in interstate commerce.
☐ Interstate isolated waters. Explain: .
☐ Other factors. Explain: .

---

[8] See Footnote # 3.
[9] To complete the analysis refer to the key in Section III.D.6 of the Instructional Guidebook.
[10] Prior to asserting or declining CWA jurisdiction based solely on this category, Corps Districts will elevate the action to Corps and EPA HQ for review consistent with the process described in the Corps/EPA *Memorandum Regarding CWA Act Jurisdiction Following Rapanos.*

Identify water body and summarize rationale supporting determination: .

Provide estimates for jurisdictional waters in the review area (check all that apply):
☐ Tributary waters: linear feet width (ft).
☐ Other non-wetland waters: acres.
Identify type(s) of waters: .
☐ Wetlands: acres.

F. NON-JURISDICTIONAL WATERS, INCLUDING WETLANDS (CHECK ALL THAT APPLY):
☐ If potential wetlands were assessed within the review area, these areas did not meet the criteria in the 1987 Corps of Engineers Wetland Delineation Manual and/or appropriate Regional Supplements.
☒ Review area included isolated waters with no substantial nexus to interstate (or foreign) commerce.
☒ Prior to the Jan 2001 Supreme Court decision in "*SWANCC*," the review area would have been regulated based solely on the "Migratory Bird Rule" (MBR).
☐ Waters do not meet the "Significant Nexus" standard, where such a finding is required for jurisdiction. Explain: .
☐ Other: (explain, if not covered above): .

Provide acreage estimates for non-jurisdictional waters in the review area, where the sole potential basis of jurisdiction is the MBR factors (i.e., presence of migratory birds, presence of endangered species, use of water for irrigated agriculture), using best professional judgment (check all that apply):
☐ Non-wetland waters (i.e., rivers, streams): linear feet width (ft).
☐ Lakes/ponds: acres.
☒ Other non-wetland waters: acres. List type of aquatic resource: List type of aquatic resource: 0.727 acre of drainage that convey urban runoff and precipitation during high flow events via overland sheet flow (see attached Figure 4)
☐ Wetlands:.

Provide acreage estimates for non-jurisdictional waters in the review area that do not meet the "Significant Nexus" standard, where such a finding is required for jurisdiction (check all that apply):
☐ Non-wetland waters (i.e., rivers, streams): linear feet, width (ft).
☐ Lakes/ponds: acres.
☐ Other non-wetland waters: acres. List type of aquatic resource: .
☐ Wetlands: acres.

SECTION IV: DATA SOURCES.

A. SUPPORTING DATA. Data reviewed for JD (check all that apply - checked items shall be included in case file and, where checked and requested, appropriately reference sources below):
☒ Maps, plans, plots or plat submitted by or on behalf of the applicant/consultant: See figures included in Jurisdictional Delineation of Wetlands and Waters report.
☒ Data sheets prepared/submitted by or on behalf of the applicant/consultant.
☒ Office concurs with data sheets/delineation report.
☐ Office does not concur with data sheets/delineation report.
☐ Data sheets prepared by the Corps: .
☐ Corps navigable waters' study: .
☐ U.S. Geological Survey Hydrologic Atlas: .
☐ USGS NHD data.
☐ USGS 8 and 12 digit HUC maps.
☒ U.S. Geological Survey map(s). Cite scale & quad name: Arroyo Grande NE 7.5 minute topographic quadrangle .
☒ USDA Natural Resources Conservation Service Soil Survey. Citation: U.S. Department of Agriculture – Natural Resources Conservation Service. 2008. Soil Survey Geographic Database for San Bernardino County, California, Southwestern Part. Version 4, January 3rd.
☐ National wetlands inventory map(s). Cite name: .
☐ State/Local wetland inventory map(s): .
☐ FEMA/FIRM maps: .
☐ 100-year Floodplain Elevation is: (National Geodectic Vertical Datum of 1929)
☒ Photographs: ☒ Aerial (Name & Date): See figures in Jurisdictional Delineation of Wetlands and Waters report.
or ☒ Other (Name & Date): See photos in Appendix B of Jurisdictional Delineation of Wetlands and Waters report. Photos were taken at the time of the wetland delineation (July 12 and 24, 2012).
☐ Previous determination(s). File no. and date of response letter: .
☐ Applicable/supporting case law: .
☐ Applicable/supporting scientific literature: .
☐ Other information (please specify): .

B. ADDITIONAL COMMENTS TO SUPPORT JD: N/A

Jurisdictional Delineation of Wetlands and Waters

Palm/Industrial Distribution Center

32821001.00

Cardno ENTRIX

Shaping the Future

Document Information

Prepared for	Palm Avenue SB, LLC
Project Name	Palm/Industrial Distribution Center
Project Number	32821001.00
Project Manager	May Lau
Date	September 12, 2012

Prepared by:

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Acronyms

ASL	above sea level
CDFG	California Department of Fish and Game
Corps	Army Corps of Engineers
CWA	Clean Water Act
ft	feet
NRCS	Natural Resource Conservation Service
NTCHS	National Technical Committee for Hydric Soils
OHWM	ordinary high water mark
RWQCB	Regional Water Quality Control Board
sf	square feet
USGS	United States Geological Survey

1 Introduction

This report presents the results of a jurisdictional wetland delineation conducted for the Palm/Industrial Distribution Center Project (proposed project). The Study Area encompasses the wetland delineation area, and includes the entire project site boundary. The Study Area is located in the City of San Bernardino in San Bernardino County; specifically, on the south side of the intersection of Interstate 215 (I-215) and Palm Avenue within an unsectioned portion of Township 1 North, Range 5 West as shown on the San Bernardino North, California 7.5-minute series U.S. Geological Survey (USGS) topographic map. Figures 1 and 2 provide the regional and vicinity locations of the Study Area.

1.1 Site Characteristics

The Study Area is currently vacant, and contains two hill features that occupy approximately 35 percent of the property. The flat terrain of the Study Area is located between 1,640 and 1,680 feet (ft) above sea level (ASL), with the larger of the two hill features reaching 1,805 ft ASL. The majority of the flat terrain has been disked, though the undisked portions and hill features support the California sagebrush-California buckwheat series vegetation community.

1.2 Proposed Project

The proposed project includes the construction of a warehouse/distribution facility consisting of a single building totaling 678,275 square feet (sf) on approximately 38.4 acres. The existing hill features located on site would be leveled and approximately 200,000 cubic yards of soil would be exported. The proposed project would include an office area, with a cross-dock loading configuration. In addition, the proposed project would include an 8-foot wrought-iron fence around the perimeter, a guard shack at the entry on Industrial Parkway, and two 8-foot screenwalls on the west side of the truck yard on both sides of the building.

0 2,500 5,000

Scale in Feet

N

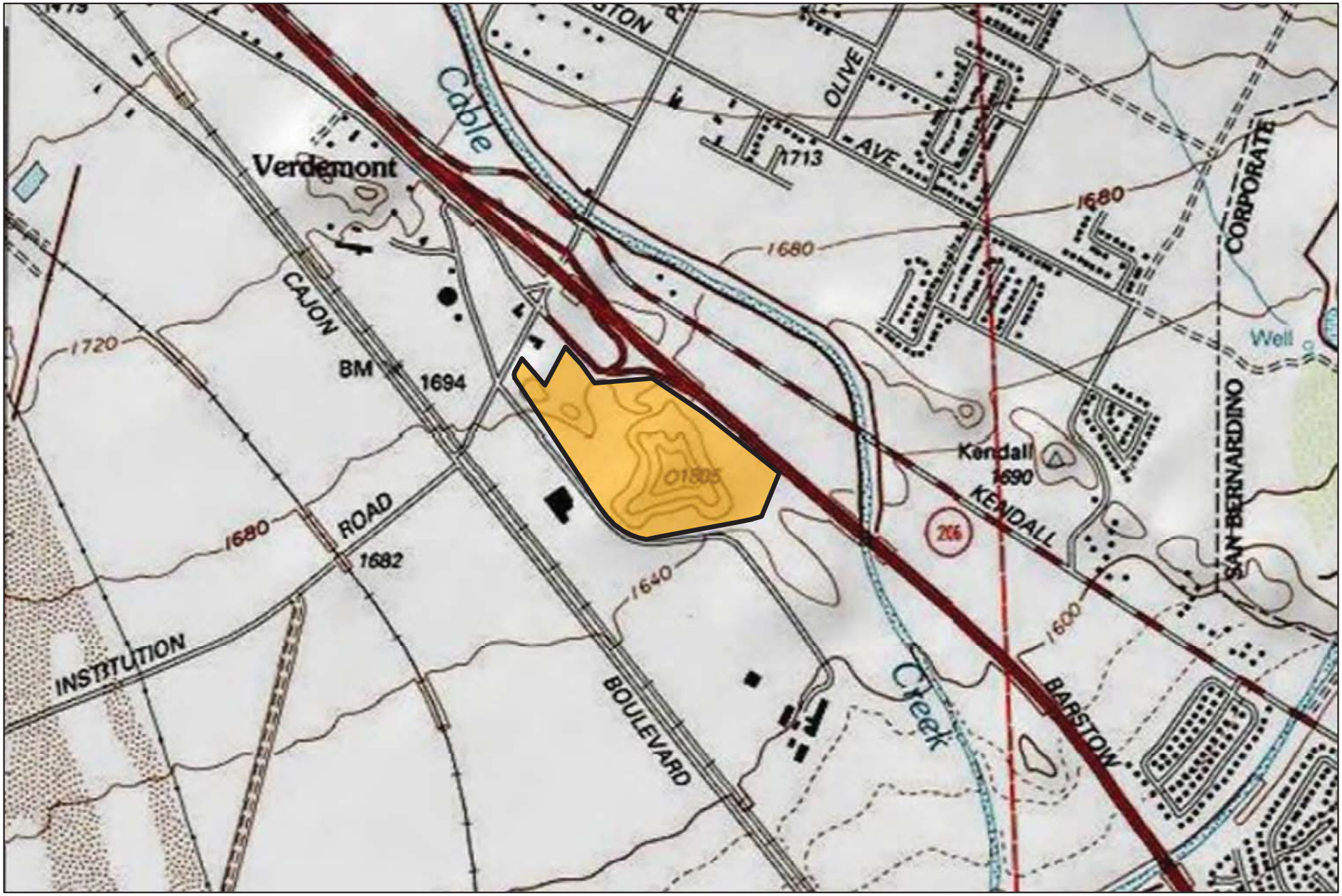
Palm/Industrial Distribution Center

FIGURE 1

Regional Location Map

Cardno ENTRIX

Date: 9/5/2012



0 500 1,000

Scale in Feet

N

Legend

Project Boundary

Palm/Industrial Distribution Center

FIGURE 2

Site Vicinity Map

Date: 9/5/2012

Cardno ENTRIX

2 Methodology

This wetland delineation was conducted in accordance with the 1987 Corps of Engineers Wetlands Delineation Manual[10] and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2.0).[11] This report was prepared in accordance with the Final Map and Drawing Standards for the South Pacific Division Regulatory Program Special Public Notice issued by the U.S. Army Corps of Engineers (Corps).[12]

A Level 2 Determination (i.e., onsite inspection) was conducted as defined in the Wetland Delineation Manual. The onsite inspection evaluated the three parameters that identify and delineate the boundaries of jurisdictional wetlands, including (1) the dominance of wetland vegetation; (2) the presence of hydric soils; and (3) hydrologic conditions that result in periods of inundation or saturation on the surface from flooding or ponding. The National Wetland Plant List - Arid West Final Draft Ratings was used to determine the wetland indicator status of plants observed in the Study Area.[13] The San Bernardino County Soil Survey, Southwestern, California[14] and the National List of Hydric Soils were used to identify soil types that occur within the Study Area.[15]

A field delineation was performed on the 12th and 24th of July 2012 by Cardno ENTRIX. Only potentially jurisdictional features within the Study Area were delineated. Data on vegetation, soils, and hydrologic characteristics were recorded in the field and data points were taken to identify boundaries between upland and potential wetland habitats. All sample locations were examined for the presence of positive hydrologic indicators (i.e., direct evidence of saturated soils). Soils were examined (via soil test pits) to determine composition, matrix color, and the presence of redoximorphic concentrations (i.e., mottles). The percent dominance by hydrophytic vegetation was also recorded at each sample location. Arid West Data Sheets were prepared for sample sites within areas that exhibited potential wetland features or provided a good representation of the physical characteristics of the delineated feature. Data sheets are provided in Appendix A. Representative photographs of the delineated feature are located in Appendix B.

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[10] Environmental Laboratory. 1987. Corps of Engineers Wetlands Delineation Manual. Technical Report Y 87 1, U.S. Army Engineer Waterways Experiment Station. Vicksburg, Miss.

[11] U.S. Army Corps of Engineers. 2008. Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2.0). September.

[12] U.S. Army Corps of Engineers. 2012. Special Public Notice Final Map and Drawing Standards for the South Pacific Division Regulatory Program. August 6.

[13] Robert W. Lichvar and John T. Kartesz. 2009. North American Digital Flora: 2012 National Wetland Plant List, version 2.4.0 (https://wetland_plants.usace.army.mil). U.S. Army Corps of Engineers, Engineer Research and Development Center, Cold Regions Research and Engineering Laboratory, Hanover, NH, and BONAP, Chapel Hill, NC. Published May 9, 2012.

[14] U.S. Department of Agriculture – Natural Resources Conservation Service. 2008. Soil Survey Geographic Database for San Bernardino County, California, Southwestern Part. Version 4, January 3rd.

[15] U.S. Department of Agriculture – Natural Resources Conservation Service. 2012. National Hydric Soils List. April.

3 Results

3.1 Vegetation

Plant communities within the Study Area were classified according to Holland's Preliminary Descriptions of the Terrestrial Natural Communities of California (1986 and 1996 update) and cross-referenced with California Department of Fish and Game's (CDFG) List of Terrestrial Natural Communities (2003).

The Study Area supports coastal sage scrub and ruderal vegetation communities, as well as disked areas. The delineated topographic feature is primarily vegetated with coastal sage scrub plant species, as further described below. Appendix C lists the plant species observed during the field delineation and includes their wetland indicator status.

3.1.1 Coastal Sage Scrub

The coastal sage scrub community occurs throughout the topographic feature. California sagebrush (*Artemisia californica*) and California buckwheat (*Eriogonum fasciculatum*) were the dominant soft-woody shrubs observed in terms of density and distribution. Other species observed included California croton (*Croton californicus*), deerweed (*Lotus scoparius*), western goldenrod (*Euthamia occidentalis*), rip-gut brome (*Bromus diandrus*), yellow star-thistle (*Centaurea solstitialis*), and black mustard (*Brassica nigra*). Due to a high percentage of sand and gravel alluvium throughout the soil profile, soils drain quickly, and do not support a prevalence of hydrophytic (i.e., water-loving) plant species. The vegetated portion of the topographic feature that contains coastal sage scrub comprises approximately 0.653 acre of the Study Area.

3.2 Soils

The Natural Resource Conservation Service (NRCS) mapped two soil types within the Study Area - Tujunga Gravelly Loamy Sand, 0 to 9 percent slopes and Friant-Rock Outcrop Complex (Figure 3). The NRCS surveys for San Bernardino County were reviewed to determine if these soils within the Study Area are considered hydric. Hydric soils are defined by the National Technical Committee for Hydric Soils (NTCHS) as soils that formed under conditions of saturation, flooding, or ponding long enough during the growing season to develop anoxic conditions in the upper part. Below is a description of the two soil types found within the Study Area. Table 1 is an analysis of their respective criterion as hydric soils.

3.2.1 Tujunga gravelly loamy sand, 0 to 9 percent slopes (TvC)

This soil type occurs along the delineated feature and consists of approximately 85 percent Tujunga and similar soils. It typically occurs on alluvial fans at elevations of 10 to 1,500 feet. These soils are somewhat excessively drained, and runoff is high. In consideration of the hydric criteria, this soil is not listed as hydric on the NRCS Soil Survey for San Bernardino County, Southwestern Part.[16]

3.2.2 Friant-Rock Outcrop Complex (Fr)

This soil type occurs in the hills of the Study Area, and consists of approximately 55 percent Friant and similar soils and 30 percent rock outcrop. It occurs on hills at elevations of 500 to 5,800 feet. These soils are somewhat excessively drained, and runoff is high. This soil is not listed as hydric on the NRCS Soil Survey for San Bernardino County, Southwestern Part.

[16] U.S. Department of Agriculture – Natural Resources Conservation Service. 2012. National Hydric Soils List. April.

0 250 500 N

Scale in Feet

Soils (NRCS, 2007)

- Fr, FRIANT-ROCK OUTCROP COMPLEX
- TvC, TUJUNGA GRAVELLY LOAMY SAND, 0 TO 9 PERCENT SLOPES
- Project Boundary

Cardno ENTRIX

Palm/Industrial Distribution Center

FIGURE 3
Soils Map

Date: 9/5/2012

Table 1 Soil Types in the Study Area

Map Symbol	Map Unit Name	Hydric Landforms	Hydric Status	Hydric Criteria
TvC	Tujunga Gravelly Loamy Sand, 0 to 9 percent slopes	Drainageways	Yes	2b3 - Water table is < 1.0 ft from the surface during the growing season is permeability is < 6.0 in/h in any layer within 20 in; 4 - Soils that are frequently flooded for long duration or very long duration during the growing season
Fr	Friant-Rock Outcrop Complex	N/A	N/A	N/A

Source: U.S. Department of Agriculture – Natural Resources Conservation Service. 2012. National Hydric Soils List. April.

3.3 Hydrology

The topographic feature is unnamed and is not identified on the San Bernardino North USGS topographic map. This feature intercepts discharges from along I-215 and its on- and off-ramps (located adjacent to the project site) and Palm Avenue, during heavy precipitation events through a concrete box culvert (Photo 1). Historic (1938) aerial images of the site show remnants of stream channels crossing the site, which have since been cut off from their water source by construction of a road now known as SR 206 / Kendall Drive.[17]

As shown in Figure 4, the primary topographic feature (TF 1A) enters the Study Area at the northwest corner of the property, and travels in a southeasterly direction (through the center of the Study Area), eventually dissipating at the western base of the larger of the two hill features located within the Study Area (Photos 2-9). A portion of the feature also branches out in an easterly direction along the northern boundary outside of the project boundary (TF 1B), and re-enters the Study Area along the north-central boundary before also dissipating on site (Photos 10-13). These features are isolated within the Study Area, and exhibit no connectivity to any drainageways outside of the Study Area. Since TF 1B appears to originate from the same source and exhibits similar characteristics as TF 1A, these features are considered as a single topographic feature for purposes of this report.

[17] Adelson, Mark. 2012. Personal communication via email with the Santa Ana Regional Water Quality Control Board. August 10.

0 250 500
Scale in Feet

N

Legend

- Data Point (DP)
- Project Boundary
- Unvegetated Topographic Feature (0.084 ac)
- Vegetated Topographic Feature (0.643 ac)

Total Acreage of Topographic Feature = 0.727 ac

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FIGURE 4
Jurisdictional Delineation

Date: 9/12/2012

0 250 500
Scale in Feet

N

Legend

- Data Point (DP)
- Project Boundary
- Unvegetated Topographic Feature (0.084 ac)
- Vegetated Topographic Feature (0.643 ac)

Total Acreage of Topographic Feature = 0.727 ac

Cardno ENTRIX

Palm/Industrial Distribution Center

FIGURE 4
Jurisdictional Delineation

Date: 9/12/2012

3.4 Topographic Feature

Data points were taken along TF 1A near the center of the Study Area (DP01 and DP02 on Figure 4). Since no distinct ordinary high water marks (OHWMs) were observed, the vegetated and unvegetated boundaries of TF 1A and TF 1B were delineated rather than the OHWM. DP01 was taken between the vegetated and unvegetated boundaries of TF 1A (Photo 3). DP01 revealed the lack of both hydrophytic vegetation and hydric soil indicators; however, wetland hydrology was observed immediately to the north, specifically, surface soil cracks in an approximate four-square-foot area (Photo 4). No surface flows were present at the time of the field delineation. DP01 did not meet the Corps' wetland criteria and no OHWM was observed. DP02 was taken within the unvegetated portion of TF 1A, between DP01 and the terminus of the feature (Photos 5-6). DP02 revealed the lack of hydrophytic vegetation, hydric soil indicators, and wetland hydrology. No surface flows were present at the time of the field delineation. DP02 also did not meet the Corps' wetland criteria and no OHWM was observed.

The average width of the delineated feature is approximately 5.2 feet. As shown in Table 2, the vegetated and unvegetated portions of the feature are 0.643 acre and 0.084 acre, respectively; thus, the entire topographic feature totals approximately 0.727 acre of the Study Area.

Table 2 Acreage of Topographic Feature

Feature Type	Acreage
Unvegetated Topo Feature	0.084
Vegetated Topo Feature	0.643
Total	0.727

3.5 Summary of Findings

3.5.1 Potential Corps and RWQCB Jurisdictional Areas

The topographic feature mapped within the Study Area does not contain an OHWM nor does it meet the Clean Water Act (CWA) definition of "other waters" of the U.S. Therefore, based on the results of the jurisdictional delineation, the entire approximately 38.4-acre Study Area, including the 0.727-acre delineated topographic feature, does not appear to fall under the regulatory authority of the Corps or the Santa Ana Regional Water Quality Control Board (RWQCB). Consultation with the RWQCB confirmed that the delineated feature is not subject to the jurisdiction of the RWQCB pursuant to the CWA[18] or the Porter-Cologne Water Quality Control Act.[19]

3.5.2 Potential CDFG Jurisdictional Areas

The vegetated and unvegetated portions of the topographic feature do not exhibit bed, bank, or channel characteristics. In addition, only upland vegetation (coastal sage scrub) occurs and no riparian vegetation occurs along the feature. Therefore, based on the results of the jurisdictional delineation, it is anticipated that the approximately 0.727-acre topographic feature is not subject to the regulatory authority of the CDFG pursuant to Section 1600 of the California Fish and Game Code.

[18] Pending confirmation from the Corps the feature is not subject to CWA.

[19] Adelson, Mark. 2012. Personal communication via email with the Santa Ana Regional Water Quality Control Board. August 10.

3.6 Supplemental Information

3.6.1 Directions to the Palm/Industrial Distribution Center Study Area

From Los Angeles, take Interstate 10 East to Interstate 15 North towards Barstow/Las Vegas. Take Interstate 215 South toward San Bernardino and merge onto Kendall Drive toward Palm Avenue. Turn left on Palm Avenue, and the westernmost portion of the Study Area will be on the left near the intersection of Palm Avenue and Industrial Parkway.

3.6.2 Contact Information

Wetland Delineation:

May Lau
Cardno ENTRIX
10940 Wilshire Blvd., Suite 1525
Los Angeles, CA 90024
424.248.2108

Palm/Industrial Distribution Center

APPENDIX A

DATA SHEETS

WETLAND DETERMINATION DATA FORM – Arid West Region

Project/Site: Palm/Industrial Distribution Center Project City/County: San Bernardino County Sampling Date: 7-12-12

Applicant/Owner: Palm Avenue SB, LLC State: CA Sampling Point: DP01

Investigator(s): May Lau; Anna Zepplin Section, Township, Range: Muscupiabe Land Grant

Landform (hillslope, terrace, etc.): Drainage Local relief (concave, convex, none): None Slope (%): < 5%

Subregion (LRR): LRR-D = Interior Deserts Lat: 34.187723 Long: -117.359582 Datum: NAD83

Soil Map Unit Name: Tujunga Gravelly Loamy Sand NWI classification: _____

Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No _____ (If no, explain in Remarks.)

Are Vegetation _____, Soil _____, or Hydrology _____ significantly disturbed? Are "Normal Circumstances" present? Yes X No _____

Are Vegetation _____, Soil _____, or Hydrology _____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes _____	No X	**Is the Sampled Area within a Wetland?** **Yes** _____ **No** X
Hydric Soil Present?	Yes _____	No X	
Wetland Hydrology Present?	Yes X	No _____	

Remarks:

DP01 at boundary between vegetated and unvegetated feature.

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: _____)	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
	_____ = Total Cover		
Sapling/Shrub Stratum (Plot size: _____)			
1. *Eriogonum fasciculatum*	15	Y	UPL
2. *Artemisia californica*	15	Y	UPL
3. *Euthamia occidentalis*	8	N	FACW
4.			
5.			
	38 = Total Cover		
Herb Stratum (Plot size: _____)			
1. *Centaurea solstitialis*	10	N	UPL
2. *Brassica nigra*	2	N	UPL
3.			
4.			
5.			
6.			
7.			
8.			
	12 = Total Cover		
Woody Vine Stratum (Plot size: _____)			
1.			
2.			
	_____ = Total Cover		

% Bare Ground in Herb Stratum 50 % Cover of Biotic Crust _____

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 0 (A)

Total Number of Dominant Species Across All Strata: 2 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 0 (A/B)

Prevalence Index worksheet:

Total % Cover of:		Multiply by:
OBL species	_____	x 1 = _____
FACW species	8	x 2 = 16
FAC species	_____	x 3 = _____
FACU species	_____	x 4 = _____
UPL species	42	x 5 = 210
Column Totals:	50 (A)	226 (B)

Prevalence Index = B/A = 4.52

Hydrophytic Vegetation Indicators:

___ Dominance Test is >50%

___ Prevalence Index is ≤3.0[1]

___ Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)

___ Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present.

Hydrophytic Vegetation Present? **Yes** _____ **No** X

Remarks:

Two large sycamores > 20 ft from right bank.

SOIL

Sampling Point: DP01

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	Matrix %	Redox Features Color (moist)	Redox %	Type[1]	Loc[2]	Texture	Remarks
0-6	2.5 YR 5/3	100					Sandy	Coarse sand

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix. [2]Location: PL=Pore Lining, RC=Root Channel, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)

___ Histosol (A1)
___ Histic Epipedon (A2)
___ Black Histic (A3)
___ Hydrogen Sulfide (A4)
___ Stratified Layers (A5) (**LRR C**)
___ 1 cm Muck (A9) (**LRR D**)
___ Depleted Below Dark Surface (A11)
___ Thick Dark Surface (A12)
___ Sandy Mucky Mineral (S1)
___ Sandy Gleyed Matrix (S4)
___ Sandy Redox (S5)
___ Stripped Matrix (S6)
___ Loamy Mucky Mineral (F1)
___ Loamy Gleyed Matrix (F2)
___ Depleted Matrix (F3)
___ Redox Dark Surface (F6)
___ Depleted Dark Surface (F7)
___ Redox Depressions (F8)
___ Vernal Pools (F9)

Indicators for Problematic Hydric Soils[3]:

___ 1 cm Muck (A9) (**LRR C**)
___ 2 cm Muck (A10) (**LRR B**)
___ Reduced Vertic (F18)
___ Red Parent Material (TF2)
___ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present.

Restrictive Layer (if present):

Type: N/A

Depth (inches): 6

Hydric Soil Present? **Yes** ___ **No** X

Remarks:

No hydric soil indicators observed. Soil type does not meet hydric criteria as identified by NRCS Hydric Soils List (i.e., if water table is < 1.0 ft from the surface during the growing season).

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (any one indicator is sufficient)

___ Surface Water (A1)
___ High Water Table (A2)
___ Saturation (A3)
___ Water Marks (B1) (**Nonriverine**)
___ Sediment Deposits (B2) (**Nonriverine**)
___ Drift Deposits (B3) (**Nonriverine**)
X Surface Soil Cracks (B6)
___ Inundation Visible on Aerial Imagery (B7)
___ Water-Stained Leaves (B9)
___ Salt Crust (B11)
___ Biotic Crust (B12)
___ Aquatic Invertebrates (B13)
___ Hydrogen Sulfide Odor (C1)
___ Oxidized Rhizospheres along Living Roots (C3)
___ Presence of Reduced Iron (C4)
___ Recent Iron Reduction in Plowed Soils (C6)
___ Other (Explain in Remarks)

Secondary Indicators (2 or more required)

___ Water Marks (B1) (**Riverine**)
___ Sediment Deposits (B2) (**Riverine**)
___ Drift Deposits (B3) (**Riverine**)
___ Drainage Patterns (B10)
___ Dry-Season Water Table (C2)
___ Thin Muck Surface (C7)
___ Crayfish Burrows (C8)
___ Saturation Visible on Aerial Imagery (C9)
___ Shallow Aquitard (D3)
___ FAC-Neutral Test (D5)

Field Observations:

Surface Water Present? Yes ___ No X Depth (inches): ___

Water Table Present? Yes ___ No X Depth (inches): ___

Saturation Present? (includes capillary fringe) Yes ___ No X Depth (inches): ___

Wetland Hydrology Present? **Yes** X **No** ___

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:

Surface soil cracks are immediately north of DP01 in a 2' x 2' area.

No OHWM observed.

WETLAND DETERMINATION DATA FORM – Arid West Region

Project/Site: Palm/Industrial Distribution Center Project City/County: San Bernardino County Sampling Date: 7-12-12

Applicant/Owner: Palm Avenue SB, LLC State: CA Sampling Point: DP02

Investigator(s): May Lau; Anna Zepplin Section, Township, Range: Muscupiabe Land Grant

Landform (hillslope, terrace, etc.): Drainage Local relief (concave, convex, none): None Slope (%): < 5%

Subregion (LRR): LRR-D = Interior Deserts Lat: 34.187191 Long: -117.359652 Datum: NAD83

Soil Map Unit Name: Tujunga Gravelly Loamy Sand NWI classification: _____

Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No _____ (If no, explain in Remarks.)

Are Vegetation _____, Soil _____, or Hydrology _____ significantly disturbed? Are "Normal Circumstances" present? Yes X No _____

Are Vegetation _____, Soil _____, or Hydrology _____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes _____	No X	**Is the Sampled Area within a Wetland?** **Yes** _____ **No** X
Hydric Soil Present?	Yes _____	No X	
Wetland Hydrology Present?	Yes _____	No X	

Remarks:
DP02 within unvegetated topo feature.

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: _____)	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
	_____ = Total Cover		
Sapling/Shrub Stratum (Plot size: _____)			
1. *Eriogonum fasciculatum*	20	Y	UPL
2. *Euthamia occidentalis*	15	Y	FACW
3. *Phacelia* sp.	5	N	--
4.			
5.			
	40 = Total Cover		
Herb Stratum (Plot size: _____)			
1. *Brassica nigra*	10	N	UPL
2.			
3.			
4.			
5.			
6.			
7.			
8.			
	10 = Total Cover		
Woody Vine Stratum (Plot size: _____)			
1.			
2.			
	_____ = Total Cover		

% Bare Ground in Herb Stratum 50 % Cover of Biotic Crust _____

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 1 (A)

Total Number of Dominant Species Across All Strata: 2 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 50 (A/B)

Prevalence Index worksheet:

Total % Cover of:		Multiply by:
OBL species	_____	x 1 = _____
FACW species	15	x 2 = 30
FAC species	_____	x 3 = _____
FACU species	_____	x 4 = _____
UPL species	30	x 5 = 150
Column Totals:	45 (A)	180 (B)

Prevalence Index = B/A = 4.0

Hydrophytic Vegetation Indicators:

___ Dominance Test is >50%

___ Prevalence Index is ≤3.0[1]

___ Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)

___ Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present.

Hydrophytic Vegetation Present? **Yes** _____ **No** X

Remarks:

SOIL

Sampling Point: DP02

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	Matrix %	Redox Features Color (moist)	Redox %	Type[1]	Loc[2]	Texture	Remarks
0-6	2.5 YR 5/3	100					Sandy	Coarse sand

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix. [2]Location: PL=Pore Lining, RC=Root Channel, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)

___ Histosol (A1)
___ Histic Epipedon (A2)
___ Black Histic (A3)
___ Hydrogen Sulfide (A4)
___ Stratified Layers (A5) (**LRR C**)
___ 1 cm Muck (A9) (**LRR D**)
___ Depleted Below Dark Surface (A11)
___ Thick Dark Surface (A12)
___ Sandy Mucky Mineral (S1)
___ Sandy Gleyed Matrix (S4)
___ Sandy Redox (S5)
___ Stripped Matrix (S6)
___ Loamy Mucky Mineral (F1)
___ Loamy Gleyed Matrix (F2)
___ Depleted Matrix (F3)
___ Redox Dark Surface (F6)
___ Depleted Dark Surface (F7)
___ Redox Depressions (F8)
___ Vernal Pools (F9)

Indicators for Problematic Hydric Soils[3]:

___ 1 cm Muck (A9) (**LRR C**)
___ 2 cm Muck (A10) (**LRR B**)
___ Reduced Vertic (F18)
___ Red Parent Material (TF2)
___ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present.

Restrictive Layer (if present):

Type: N/A

Depth (inches): 6

Hydric Soil Present? **Yes** ___ **No** X

Remarks:

No hydric soil indicators observed. Soil type does not meet hydric criteria as identified by NRCS Hydric Soils List (i.e., if water table is < 1.0 ft from the surface during the growing season).

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (any one indicator is sufficient)

___ Surface Water (A1)
___ High Water Table (A2)
___ Saturation (A3)
___ Water Marks (B1) (**Nonriverine**)
___ Sediment Deposits (B2) (**Nonriverine**)
___ Drift Deposits (B3) (**Nonriverine**)
___ Surface Soil Cracks (B6)
___ Inundation Visible on Aerial Imagery (B7)
___ Water-Stained Leaves (B9)
___ Salt Crust (B11)
___ Biotic Crust (B12)
___ Aquatic Invertebrates (B13)
___ Hydrogen Sulfide Odor (C1)
___ Oxidized Rhizospheres along Living Roots (C3)
___ Presence of Reduced Iron (C4)
___ Recent Iron Reduction in Plowed Soils (C6)
___ Other (Explain in Remarks)

Secondary Indicators (2 or more required)

___ Water Marks (B1) (**Riverine**)
___ Sediment Deposits (B2) (**Riverine**)
___ Drift Deposits (B3) (**Riverine**)
___ Drainage Patterns (B10)
___ Dry-Season Water Table (C2)
___ Thin Muck Surface (C7)
___ Crayfish Burrows (C8)
___ Saturation Visible on Aerial Imagery (C9)
___ Shallow Aquitard (D3)
___ FAC-Neutral Test (D5)

Field Observations:

Surface Water Present? Yes ___ No X Depth (inches): ___

Water Table Present? Yes ___ No X Depth (inches): ___

Saturation Present? (includes capillary fringe) Yes ___ No X Depth (inches): ___

Wetland Hydrology Present? **Yes** ___ **No** X

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:

Some drift deposits approx. 6 feet downstream of DP02, consisting mostly of twigs along with some leaf litter.

No OHWM observed.

Palm/Industrial Distribution Center

APPENDIX B

REPRESENTATIVE SITE PHOTOGRAPHS

Appendix B
Representative Site Photographs

Photo 1: Box culvert where urban runoff is intercepted below the I-215.

Photo 2: Looking west towards Industrial Parkway at the terminus of the primary topo feature.

Photo 3: DP01, looking north where the primary topo feature is bisected by a dirt road.

Photo 4: Soil cracks observed immediately north of DP01.

Photo 5: DP02, looking north.

Photo 6: DP02, looking south.

Photo 7: Looking north down the middle of the unvegetated topo feature and adjacent coastal sage scrub vegetation along feature.

Photo 8: Looking southeast at the topo feature and adjacent disked areas.

Photo 9: Looking southeast at vegetated and unvegetated portions of the topo feature.

Photo 10: Looking north at the topo feature along the northern-central boundary of the Study Area.

Photo 11: Looking southeast at the topo feature along the northern-central boundary of the Study Area.

Photo 12: Looking north at the topo feature along the northern-central boundary of the Study Area where it is bisected by a dirt path.

Photo 13: Terminus of topo feature along the northern-central boundary of the Study Area.

Palm/Industrial Distribution Center

APPENDIX C

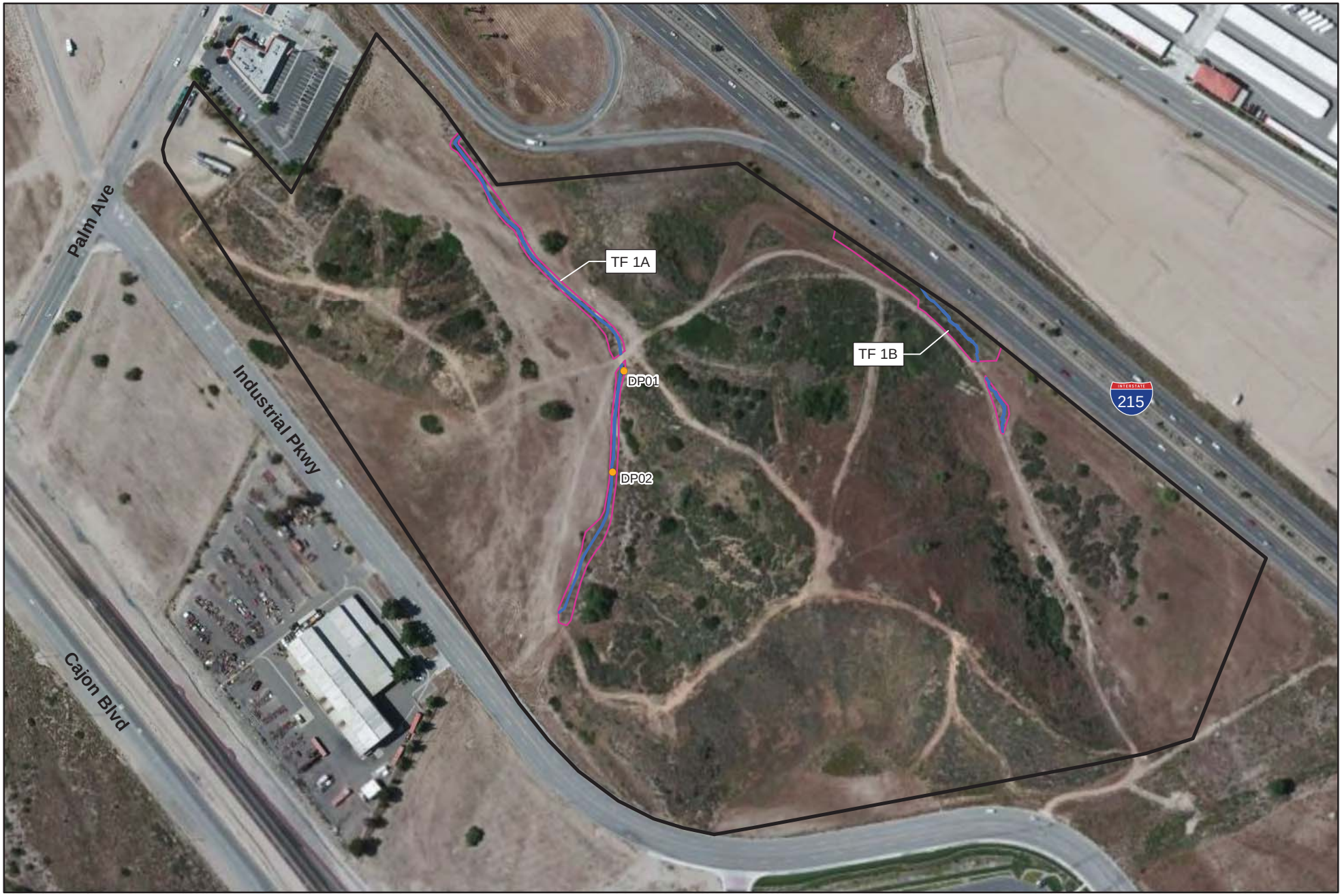
PLANT SPECIES OBSERVED

Appendix C
Plant Species Observed

Scientific Name	Common Name	Wetland Indicator Status
Adenostoma fasciculatum	Chamise	UPL
Artemisia californica	California sagebrush	UPL
Brassica nigra	Black mustard	UPL
Bromus diandrus	Rip-gut brome	UPL
Centaurea solstitialis	Yellow star-thistle	UPL
Croton californicus	California croton	UPL
Eriogonum fasciculatum	California buckwheat	UPL
Euthamia occidentalis	Western goldenrod	FACW
Lotus scoparius	Deerweed	UPL
Phacelia sp.	Phacelia	--
Salvia apiana	White sage	UPL

Wetland Indicator Status:
UPL – Upland
FACU – Facultative Upland
FAC – Facultative
FACW – Facultative Wetland
OBL – Obligate
-- Not enough information to determine wetland indicator status since plant was not identified to species level

ATTACHMENT C



0 250 500
Scale in Feet

N

Legend

- Data Point (DP)
- Project Boundary
- Unvegetated Topographic Feature (0.084 ac)
- Vegetated Topographic Feature (0.643 ac)

Total Acreage of Topographic Feature = 0.727 ac

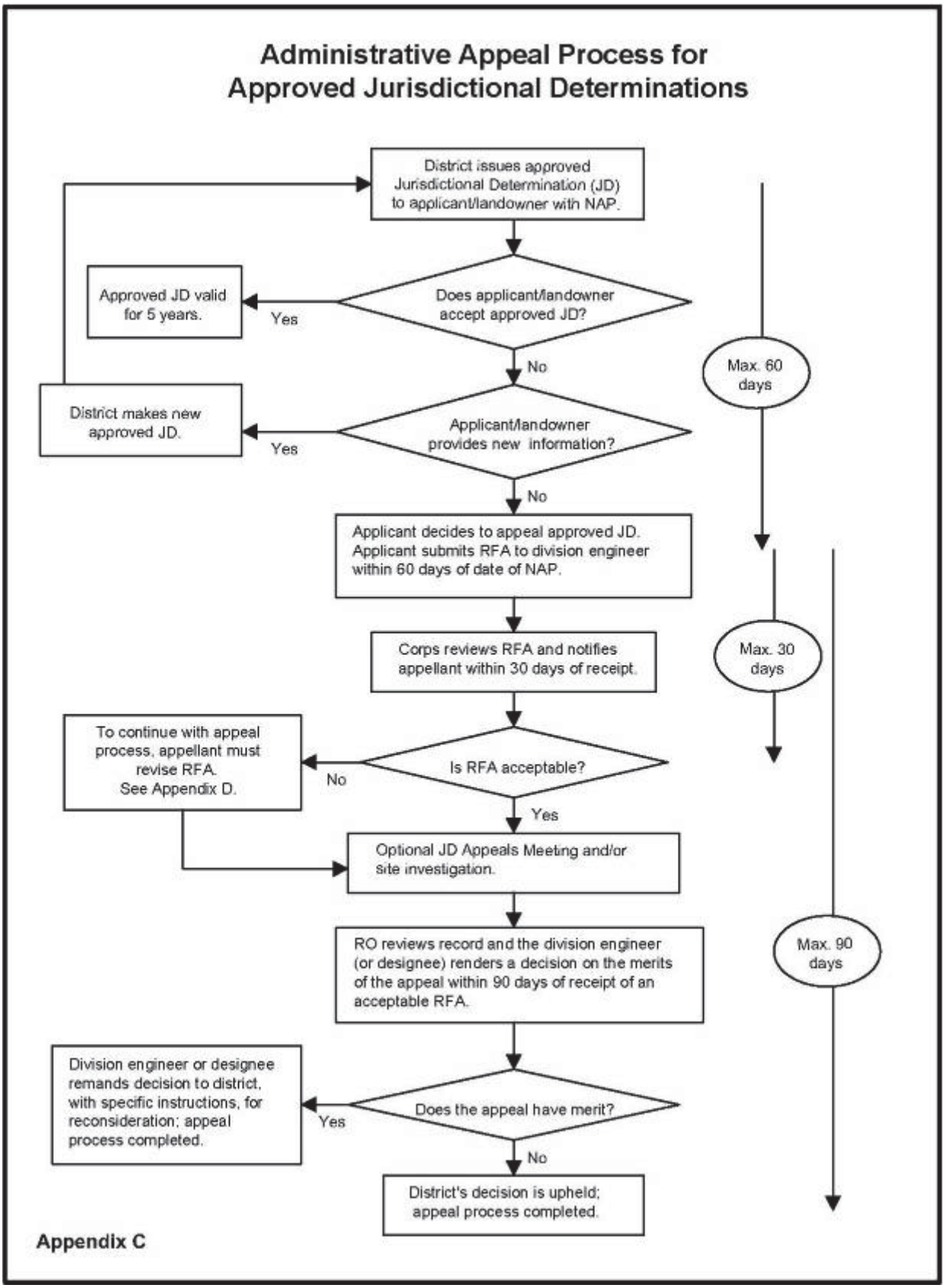
Cardno ENTRIX

Palm/Industrial Distribution Center

FIGURE 4
Jurisdictional Delineation

Date: 9/12/2012

ATTACHMENT D


Administrative Appeal Process for
Approved Jurisdictional Determinations
District issues approved Jurisdictional Determination (JD) to applicant/landowner with NAP.
Does applicant/landowner accept approved JD?
Yes
Approved JD valid for 5 years.
No
Applicant/landowner provides new information?
Yes
District makes new approved JD.
No
Applicant decides to appeal approved JD. Applicant submits RFA to division engineer within 60 days of date of NAP.
Max. 60 days
Corps reviews RFA and notifies appellant within 30 days of receipt.
Max. 30 days
Is RFA acceptable?
No
To continue with appeal process, appellant must revise RFA. See Appendix D.
Yes
Optional JD Appeals Meeting and/or site investigation.
RO reviews record and the division engineer (or designee) renders a decision on the merits of the appeal within 90 days of receipt of an acceptable RFA.
Max. 90 days
Does the appeal have merit?
Yes
Division engineer or designee remands decision to district, with specific instructions, for reconsideration; appeal process completed.
No
District's decision is upheld; appeal process completed.
Appendix C

ATTACHMENT E

NOTIFICATION OF ADMINISTRATIVE APPEAL OPTIONS AND PROCESS AND REQUEST FOR APPEAL

Applicant Palm SB, LLC.	File Number: **SPL-** 2012- 00671	Date: January 10, 2013
Attached is:		See Section below
	INITIAL PROFFERED PERMIT (Standard Permit or Letter of permission)	A
	PROFFERED PERMIT (Standard Permit or Letter of permission)	B
	PERMIT DENIAL	C
X	APPROVED JURISDICTIONAL DETERMINATION	D
	PRELIMINARY JURISDICTIONAL DETERMINATION	E

SECTION I - The following identifies your rights and options regarding an administrative appeal of the above decision. Additional information may be found at http://usace.army.mil/inet/functions/cw/cecwo/reg or Corps regulations at 33 CFR Part 331.

A: INITIAL PROFFERED PERMIT: You may accept or object to the permit.

- ACCEPT: If you received a Standard Permit, you may sign the permit document and return it to the district engineer for final authorization. If you received a Letter of Permission (LOP), you may accept the LOP and your work is authorized. Your signature on the Standard Permit or acceptance of the LOP means that you accept the permit in its entirety, and waive all rights to appeal the permit, including its terms and conditions, and approved jurisdictional determinations associated with the permit.
- OBJECT: If you object to the permit (Standard or LOP) because of certain terms and conditions therein, you may request that the permit be modified accordingly. You must complete Section II of this form and return the form to the district engineer. Your objections must be received by the district engineer within 60 days of the date of this notice, or you will forfeit your right to appeal the permit in the future. Upon receipt of your letter, the district engineer will evaluate your objections and may: (a) modify the permit to address all of your concerns, (b) modify the permit to address some of your objections, or (c) not modify the permit having determined that the permit should be issued as previously written. After evaluating your objections, the district engineer will send you a proffered permit for your reconsideration, as indicated in Section B below.

B: PROFFERED PERMIT: You may accept or appeal the permit

- ACCEPT: If you received a Standard Permit, you may sign the permit document and return it to the district engineer for final authorization. If you received a Letter of Permission (LOP), you may accept the LOP and your work is authorized. Your signature on the Standard Permit or acceptance of the LOP means that you accept the permit in its entirety, and waive all rights to appeal the permit, including its terms and conditions, and approved jurisdictional determinations associated with the permit.
- APPEAL: If you choose to decline the proffered permit (Standard or LOP) because of certain terms and conditions therein, you may appeal the declined permit under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. This form must be received by the division engineer within 60 days of the date of this notice.

C: PERMIT DENIAL: You may appeal the denial of a permit under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. This form must be received by the division engineer within 60 days of the date of this notice.

D: APPROVED JURISDICTIONAL DETERMINATION: You may accept or appeal the approved JD or provide new information.

- ACCEPT: You do not need to notify the Corps to accept an approved JD. Failure to notify the Corps within 60 days of the date of this notice, means that you accept the approved JD in its entirety, and waive all rights to appeal the approved JD.
- APPEAL: If you disagree with the approved JD, you may appeal the approved JD under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. This form must be received by the division engineer within 60 days of the date of this notice.

E: PRELIMINARY JURISDICTIONAL DETERMINATION: You do not need to respond to the Corps regarding the preliminary JD. The Preliminary JD is not appealable. If you wish, you may request an approved JD (which may be appealed), by contacting the Corps district for further instruction. Also you may provide new information for further consideration by the Corps to reevaluate the JD.

SECTION II - REQUEST FOR APPEAL or OBJECTIONS TO AN INITIAL PROFFERED PERMIT

REASONS FOR APPEAL OR OBJECTIONS: (Describe your reasons for appealing the decision or your objections to an initial proffered permit in clear concise statements. You may attach additional information to this form to clarify where your reasons or objections are addressed in the administrative record.)

ADDITIONAL INFORMATION: The appeal is limited to a review of the administrative record, the Corps memorandum for the record of the appeal conference or meeting, and any supplemental information that the review officer has determined is needed to clarify the administrative record. Neither the appellant nor the Corps may add new information or analyses to the record. However, you may provide additional information to clarify the location of information that is already in the administrative record.

POINT OF CONTACT FOR QUESTIONS OR INFORMATION:

If you have questions regarding this decision and/or the appeal process you may contact: **Brianne McGuffie** **US Army Corps of Engineers** **Los Angeles District, Regulatory Division** **915 Wilshire Boulevard** **Los Angeles, CA 90017** **Phone: (213) 452-3419** **Email: Brianne.E.McGuffie@usace.army.mil**	If you only have questions regarding the appeal process you may also contact: **Thomas J. Cavanaugh** **Administrative Appeal Review Officer,** **US Army Corps of Engineers** **South Pacific Division** **1455 Market Street, 2052B** **San Francisco, CA 94103-1399** **Phone: (415) 503-6574 Fax: *415) 503-6646** **Email: Thomas.j.cavanaugh@usace.army.mil**

RIGHT OF ENTRY: Your signature below grants the right of entry to Corps of Engineers personnel, and any government consultants, to conduct investigations of the project site during the course of the appeal process. You will be provided a 15 day notice of any site investigation, and will have the opportunity to participate in all site investigations.

_____ Signature of appellant or agent.	Date:	Telephone number: