

**INITIAL STUDY**  
**Used-Car Retail Development and**  
**Refurbishing Facility Project and**  
**Amendment No. 51 to the East Valley**  
**Corridor Specific Plan**  
**CITY OF REDLANDS, CALIFORNIA**

***Prepared for:***

CITY OF REDLANDS  
35 Cajon Street, Suite 15A  
Redlands, CA 92373



***Prepared by:***

**CHAMBERS GROUP, INC.**  
3151 Airway Ave., Suite F208,  
Costa Mesa, CA 92626  
(949) 261-5414

**May 2024**

**TABLE OF CONTENTS**

	<u>Page</u>
<b>SECTION 1.0 – PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING .....</b>	<b>1</b>
1.1 PROJECT PURPOSE AND BACKGROUND .....	1
1.2 PROJECT LOCATION AND SITE CHARACTERISTICS .....	1
1.2.1 Project Site Location .....	1
1.2.2 General Plan/Zoning .....	1
1.3 PROJECT DESCRIPTION .....	1
1.3.1 Circulation .....	2
1.3.2 Site Plan.....	2
1.3.3 Architecture .....	3
1.3.4 Landscape and Site Drainage .....	3
1.3.5 Site Lighting and Security.....	3
1.3.6 Production/Reconditioning.....	3
1.3.7 Construction.....	4
1.3.8 Operations .....	4
1.4 REQUIRED PERMITS AND APPROVALS.....	4
1.4.1 Permits and Approvals .....	4
1.5 RELATED TECHNICAL STUDIES .....	5
<b>SECTION 2.0 – ENVIRONMENTAL DETERMINATION .....</b>	<b>8</b>
2.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: .....	8
2.2 DETERMINATION .....	8
<b>SECTION 3.0 – EVALUATION OF ENVIRONMENTAL IMPACTS.....</b>	<b>9</b>
<b>SECTION 4.0 – INITIAL STUDY CHECKLIST.....</b>	<b>10</b>
4.1 AESTHETICS.....	10
4.1.1 Impact Analysis .....	10
4.2 AGRICULTURE & FORESTRY RESOURCES .....	12
4.2.1 Impact Analysis .....	12
4.3 AIR QUALITY.....	14
4.3.1 Impact Analysis .....	14
4.4 BIOLOGICAL RESOURCES .....	26
4.4.1 Impact Analysis .....	27
4.5 CULTURAL RESOURCES .....	31
4.5.1 Impact Analysis .....	31
4.6 ENERGY .....	36
4.6.1 Impact Analysis .....	37
4.7 GEOLOGY AND SOILS .....	40
4.7.1 Impact Analysis .....	41

4.8	GREENHOUSE GAS EMISSIONS .....	45
4.8.1	Impact Analysis .....	45
4.9	HAZARDS AND HAZARDOUS MATERIALS.....	48
4.9.1	Impact Analysis .....	49
4.10	HYDROLOGY AND WATER QUALITY.....	54
4.10.1	Impact Analysis .....	54
4.11	LAND USE AND PLANNING .....	58
4.11.1	Impact Analysis .....	58
4.12	MINERAL RESOURCES.....	59
4.12.1	Impact Analysis .....	59
4.13	NOISE .....	60
4.13.1	Impact Analysis .....	60
4.14	POPULATION AND HOUSING .....	64
4.14.1	Impact Analysis .....	64
4.15	PUBLIC SERVICES.....	65
4.15.1	Impact Analysis .....	65
4.16	RECREATION .....	67
4.16.1	Impact Analysis .....	67
4.17	TRANSPORTATION .....	68
4.17.1	Impact Analysis .....	68
4.18	TRIBAL CULTURAL RESOURCES.....	70
4.18.1	Impact Analysis .....	71
4.19	UTILITIES AND SERVICE SYSTEMS .....	75
4.19.1	Impact Analysis .....	75
4.20	WILDFIRE.....	77
4.20.1	Impact Analysis .....	78
4.21	MANDATORY FINDINGS OF SIGNIFICANCE.....	79
4.21.1	Impact Analysis .....	79
<b>SECTION 5.0 – – MITIGATION, MONITORING AND REPORTING PLAN .....</b>		<b>81</b>
<b>SECTION 6.0 – REFERENCES .....</b>		<b>93</b>
<b>APPENDIX A – Air Quality Assessment</b>		
<b>APPENDIX B – Health Risk Assessment</b>		
<b>APPENDIX C – Biological Resources Letter Report</b>		
<b>APPENDIX D – Cultural Resources Survey and Study Letter Report</b>		
<b>APPENDIX E – Geotechnical Engineering Report</b>		
<b>APPENDIX F – Greenhouse Gas Emissions Assessment</b>		
<b>APPENDIX G – Phase 1 Environmental Site Assessment</b>		
<b>APPENDIX H – Preliminary Water Quality Management Plan</b>		
<b>APPENDIX I – Hydrology and Hydraulics (Drainage Report)</b>		
<b>APPENDIX J – Acoustic Assessment</b>		
<b>APPENDIX K – Traffic Study</b>		

**LIST OF TABLES**

	<u>Page</u>
Table 1: Construction-Related Emissions.....	17
Table 2: Operational Emissions.....	17
Table 3: Localized Significance of Construction Emissions .....	18
Table 4: Localized Significance of Operational Emissions.....	18
Table 5: Equipment-Specific Grading Rates.....	23
Table 6: Unmitigated Carcinogenic Risk Assessment .....	25
Table 7: Electricity (kWh/yr) and Natural Gas (kBTU/yr).....	39
Table 8: Construction-Related Greenhouse Gas Emissions .....	46
Table 9: Project Greenhouse Gas Emissions.....	47
Table 10: Project Construction Noise Levels.....	62

**LIST OF FIGURES**

	<u>Page</u>
<b>Figure 1 - Project Vicinity Map</b> .....	6
<b>Figure 2 – Preliminary Site Plan</b> .....	7

## SECTION 1.0 – PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING

### 1.1 PROJECT PURPOSE AND BACKGROUND

The Project Applicant is proposing the construction of a pre-owned automobile sales and service/reconditioning facility within the East Valley Corridor Specific Plan area of the City of Redlands (City). The development will consist of a sales building, service/reconditioning building, final Quality Control building, a non-public carwash, private fuel tank/dispenser, automobile sales display area (retail), vehicle staging areas (reconditions, sales, inspection and pick-up/drop-off), public parking lots, truck loading/unloading driveways and associated landscaped areas (Proposed Project or Project).

The Proposed Project will include an amendment to the Specific Plan General Commercial District to allow pre-owned automobile sales as a conditional use permitted land use (without sales of new automobiles). The automobile refurbishing and reconditioning facility is a conditionally permitted use.

### 1.2 PROJECT LOCATION AND SITE CHARACTERISTICS

#### 1.2.1 Project Site Location

The Proposed Project site is located within undeveloped parcels in the City of Redlands, in San Bernardino County, west of New York Street at West Brockton Avenue (adjacent to Interstate 210 [I-210]), between an existing home improvement retailer (to the north), and automobiles dealership (to the south) (Project site) as shown on Figure 1. The Project site is vacant and regularly disced for weed abatement. The Project site is located within the East Valley Corridor Specific Plan (Specific Plan) at the following Associated Parcel Numbers (APNs): APN 0169-011-39, APN 0169-011-38.

#### 1.2.2 General Plan/Zoning

The Project site is zoned as Commercial (City 2022a). The Redlands General Plan Land Use Map provides two land use designations for the project site. Westerly portions of the two properties are designated for “Commercial” land use (totaling approximately 2.2 acres adjacent to the 210 Freeway), and remaining area of the parcels are within the “Commercial/Industrial” land use designation (totaling approximately 16.36 acres)( City 2022b) Zoning to the north and south of the Project site is EV/CG, to the east are Agricultural (A-1) and Industrial (M-1), and to the west is the I-210. Existing uses surrounding the Project site are a home improvement retailer to the north, automobile dealership to the south, and undeveloped properties and various commercial buildings to the east.

The General Commercial District area within the Specific Plan may contain major department stores, professional headquarters, small customer, and specialty businesses, eating establishments, and regional shopping centers as well as a variety other business. Retail sales of goods for automobiles, automobile rentals, and car washes are permitted uses. Repair and servicing facilities are allowed for any article which is permitted to be sold in this General Commercial District.

### 1.3 PROJECT DESCRIPTION

The Proposed Project includes Commission Review and Approval No. 962, which would include the construction of a pre-owned automobile sales, refurbishing, and reconditioning facility with outdoor vehicle storage. The Project site will be constructed on undeveloped parcels west of New York Street and east of the I-210 on parcels 0169-001-38 and 0169-011-39 on approximately 18.627 acres.

Additional components of the project include: a Specific Plan Amendment to the East Valley Corridor Specific Plan (to allow pre-owned automobile sales without the sale of new vehicles as a conditionally permitted use), and a Conditional Use Permit (CUP). Project details are described further below.

**1.3.1      Circulation**

The site is proposed to be publicly accessed from a single full movement driveway on New York Street, that will be directly aligned with the Brockton Avenue intersection. An additional driveway for test drives only and emergency access with Knox Box access only will be at the north end of the sales/display lot. The customer and employee parking area will be located on the southern side of the site, adjacent to New York Street and the existing automobile dealership to the south. In addition to passenger vehicle parking, four car-carrier loading spaces are provided in the southwestern portion of the lot. A paved and striped area known as the vehicle sales display area will be located along the northeast portion of the property and will be surrounded by a low guardrail system for security purposes. This sales display area is the "outdoor showroom" for vehicles available for retail purchase. Vehicular access to the sales display area is secured with embassy-style security gates and pedestrian access is only available by passing through the building's sales offices. A paved area known as the vehicle staging area will be located to the west and north side of the property and will be surrounded by a 6-foot high masonry wall for screening and security purposes. This staging area is the Project's "back of house" area where vehicles are staged while awaiting inspection, sales, reconditioning, or pickup for distribution elsewhere. Access to the non-public staging area will also be secured with embassy-style security gates.

**1.3.2      Site Plan**

The buildings on-site are centered on the property as shown in Figure 2. The sales building (4,958 square feet (SF)) will be the most prominent building as it fronts all three areas of the site (public parking lot/sales display area/staging area) while the service/reconditioning building (39,621 SF), Final Quality Control (FQC) building (2,772 SF), and non-public carwash (936 SF) are located primarily within the screened staging area. The sales building and service/reconditioning/FQC/carwash buildings are connected by a pass-through "presentation" lane (1,204 SF) where vehicles are exchanged between customers and employees. The total building square footage proposed for the site is 49,491 SF. The development details are provided below:

BUILDING	SQUARE FOOTAGE/ACRES
Sales and Administration	4,958 SF
Production	39,621 SF
Non-Public Car Wash / FQC	3,708 SF
Presentation Lane	1,204 SF
Total Building Area	1.24 acres
Pavement/Impervious Areas	12.1 acres
Landscape/Grass Areas	5.22 acres
Total Area	18.63 acres
Customer/Employee Parking Spaces	Customers/Employees: 292 Spaces Sales Display Area: 304 Spaces Production: 1105 Spaces

### **1.3.3 Architecture**

The proposed building facade will be constructed of earth-tone colored split face and smooth concrete masonry unit (CMU) block along with large glazing areas. Massing will be articulated by a tonal color banding in the CMU. The architectural treatments will be applied consistently to all building facades to create a cohesive look. Variated roof forms will be incorporated to distinguish the main customer entry points to the building. These entry features will be constructed of white exterior insulation and finish system (EIFS) pilasters and a blue standing seam gable roof with the company logo above the entry doors. Roof-top equipment will be screened by a pre-finished earth-tone metal Roof Top Unit (RTU) screen and parapet walls.

### **1.3.4 Landscape and Site Drainage**

Landscaping will be incorporated into the public parking lot, around the perimeter of the site. Landscaping will include deciduous trees and shrubs, evergreen shrubs, sod, wood mulch, and rock mulch. All landscaping will be designed to meet the City's Water Efficient Landscape requirements.

The majority of runoff from the site will be intercepted by inlets and swales that convey the flows downstream to an infiltration basin for detention. The detention basin will infiltrate stormwater and discharge additional runoff directly into the California Department of Transportation (Caltrans) Channel via an outlet pipe. Each inlet is being sized to limit ponding depths to less than the curb height of 6 inches.

### **1.3.5 Site Lighting and Security**

The Proposed Project will use light-emitting diode (LED) lighting fixtures mounted on 26-foot-tall light poles for visibility and security. Fixtures will be fully cut off and downcast to reduce light spill onto adjacent properties. Security at the Project site will use interior and exterior security cameras that are tied to its Home Office security system for safety and inventory protection.

### **1.3.6 Production/Reconditioning**

The Proposed Project will acquire its pre-owned vehicle inventory from its customers and the general public at its retail stores or by purchasing wholesale pre-owned vehicles from third party sellers. Those vehicles purchased from the public, meeting company standards for sale at its retail facility, are prepared for sale through the reconditioning process described below. Inventory that does not meet the company standards for sale to retail customers (due to age, mileage, customization, the level of reconditioning required, or the like) will be transported off-site to other wholesale facilities.

The reconditioning process consists of inspection and reconditioning. The proposed reconditioning facility will contain parking areas for associates, a secured parking area for inventory arriving or departing from the facility, loading, and unloading areas for vehicle transporters, and a fully conditioned and enclosed service building with a paint booth. The reconditioning facility will also be equipped with an attached FQC building and attached carwash building along with fuel pumps for fueling inventory vehicles.

The reconditioning facility only performs work on internal inventory, and it is not open to the public. Likewise, the carwash and fuel pumps located on-site are used only for the reconditioning process by the company associates/employees.

### **1.3.7 Construction**

Construction of the Proposed Project will require multiple workers using equipment such as loaders, pick-up trucks, a backhoe, a water truck for dust suppression, a crane, an asphalt paver, and excavators. Project materials will be staged on-site. The Project site will be excavated and graded to construct the proposed buildings and internal driveways and parking lots. Engineered fill will be used beneath building structures, exterior slabs, and pavements. Approximately 1,506 cubic yards of fill will be imported to the site. An existing sewer line on-site will be left in place. Excavated soils will be kept on-site.

The Project is expected to break ground in 2025 and be completed by 2026. Construction activities will take place from 7:00 a.m. to 6:00 p.m. Monday through Saturday. No construction work will occur on Sundays or holidays per the City's Community Noise Control Section Chapter 8.06 of the Municipal Code (City 2023).

### **1.3.8 Operations**

Store management will set operating hours closer to the opening date; however, the showroom (retail sales) areas are typically open to the public Monday through Saturday from 9:00 a.m. to 9:00 p.m. with more limited hours on Sundays. Associates will be present at the store several hours before and after the public operating hours. Service/reconditioning operations will be up to 24 hours a day, 7 days a week for company operations and not for the general public.

There will be approximately 32 sales/administration employees on-site 12 hours daily 6 days per week (10 a.m.-9 p.m.). The production facility will employ 170 total employees, split in half between two 8-hour shifts (7 a.m.-3 p.m. and 3 p.m.-11 p.m.). Therefore, during daytime work hours, there will be up to 117 total employees on-site between 8 a.m. and 9 p.m.

## **1.4 REQUIRED PERMITS AND APPROVALS**

Reviewing Agencies include those agencies that do not have discretionary authority but may review the Initial Study and Negative Declaration for adequacy and accuracy. Responsible Agencies have discretionary approval authority for a project and may rely on this IS/MND for their independent decision-making process. Potential Reviewing Agencies and Responsible Agencies include the following:

### Responsible Agencies

- California State Water Resources Control Board (SWRCB) Division of Drinking Water (DDW)- Permit for Domestic Water Supply

### Reviewing Agencies

- South Coast Air Quality Management District (SCAQMD) - Permit to Construct a Gasoline Dispensing Facility and compliance with Rules 402,1151, and 1171

### **1.4.1 Permits and Approvals**

The following permits and approvals may be required prior to construction of the Project:

- Commission Review & Approval permit for Site Plan review



- Grading Permit
- Building Permit
- Compliance with National Pollutant Discharge Elimination System (NPDES) Construction General Permit by the Regional Water Quality Control Board (RWQCB)
- Conditional Use Permit for the proposed land use(s)
- South Coast Air Quality Management Plan (AQMD) permit(s), if applicable, for automobile painting operations and Gasoline Dispensing Facility.

## **1.5 RELATED TECHNICAL STUDIES**

The following technical studies have been prepared to evaluate the proposed project's environmental effects, and are hereby incorporated by reference. Appropriate references are included in the text of this Initial Study in the applicable sections and the studies are included as appendices.

- Air Quality Assessment
- Health Risk Assessment
- Biological Resources Letter Report
- Cultural Resources Survey and Study Letter Report
- Geotechnical Engineering Report
- Greenhouse Gas (GHG) Emissions Assessment
- Phase 1 Environmental Site Assessment
- Preliminary Water Quality Management Plan
- Hydrology and Hydraulics (Drainage Report)
- Acoustic Assessment
- Traffic Study

Figure 1 - Project Vicinity Map

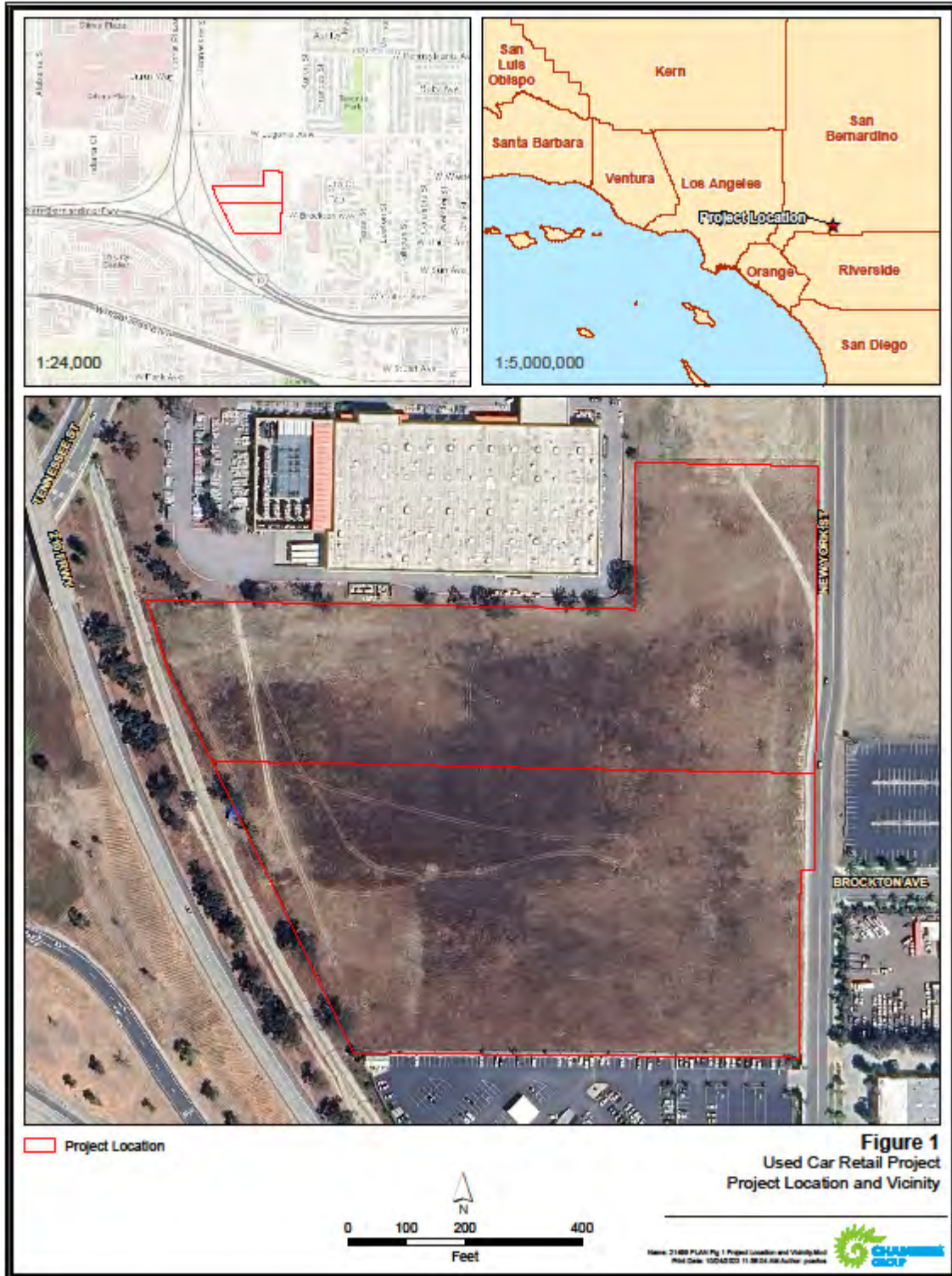
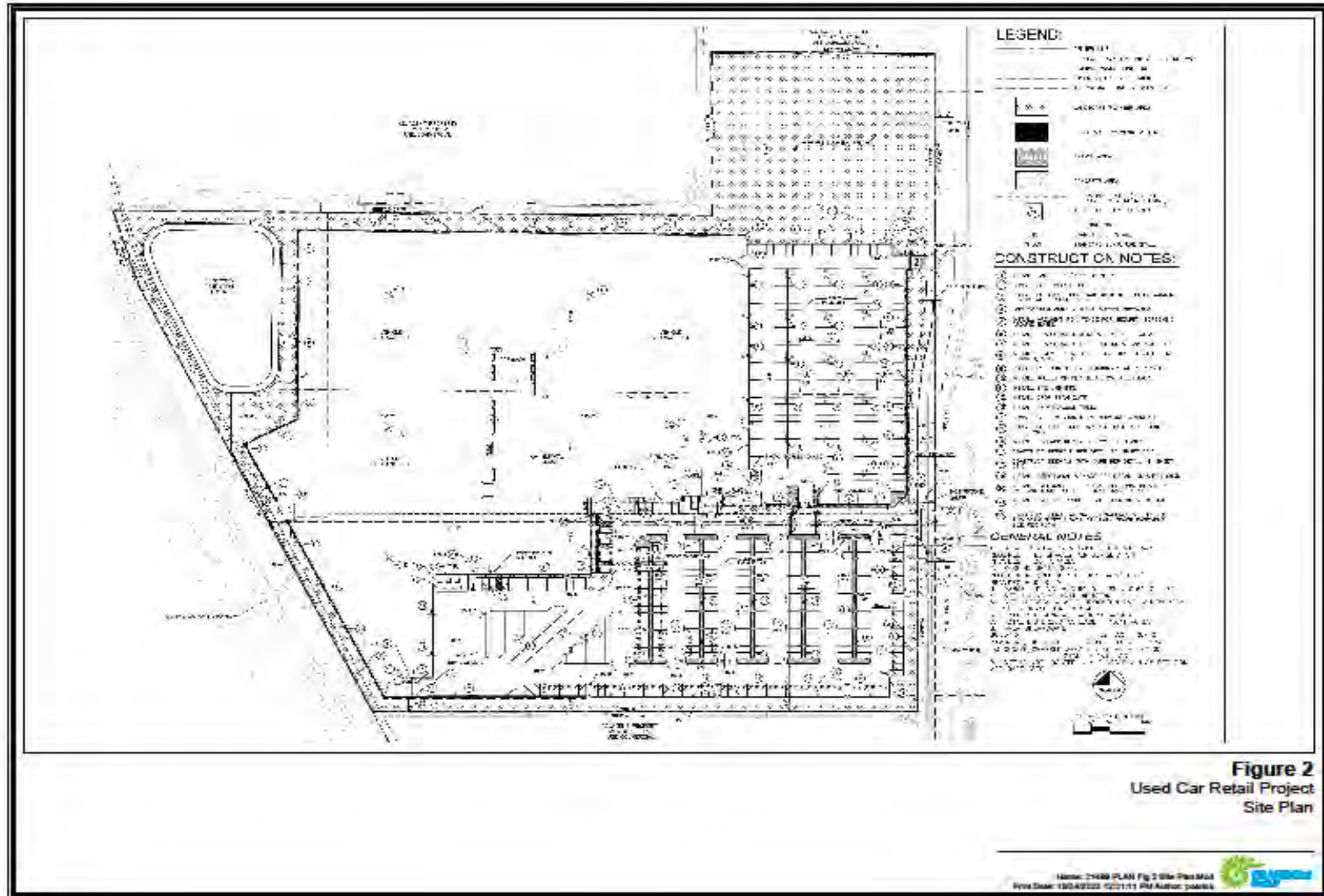


Figure 2 – Preliminary Site Plan



## SECTION 2.0 – ENVIRONMENTAL DETERMINATION

### 2.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:


The environmental factors checked below would potentially be affected by this project, involving at least one impact that is a “Potentially Significant Impact,” as indicated by the checklists on the following pages. For each of the potentially affected factors, mitigation measures are recommended that would reduce the impacts to less than significant levels.

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

### 2.2 DETERMINATION

On the basis of this initial evaluation:

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

 <hr style="border: 0.5px solid black;"/>	<p style="text-align: center;">May 2, 2024</p> <hr style="border: 0.5px solid black;"/>
Signature	Date
Ryan Murphy	Senior Planner
Name	Title



### **SECTION 3.0 – EVALUATION OF ENVIRONMENTAL IMPACTS**

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if substantial evidence exists that an effect may be significant. If one or more “Potentially Significant Impact” entries are marked when the determination is made, an EIR is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from earlier analyses may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - a. Earlier Analysis Used. Identify and state where they are available for review.
  - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c. Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. The explanation of each issue should identify:
- a. the significance criteria or threshold, if any, used to evaluate each question; and
  - b. the mitigation measure identified, if any, to reduce the impact to less than significant.

*\*Note: Instructions may be omitted from final document.*

**SECTION 4.0 – INITIAL STUDY CHECKLIST**

**4.1 AESTHETICS**

1.	AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**4.1.1 Impact Analysis**

a) *Would the project have a substantial adverse effect on a scenic vista?*

**Less than Significant.** As described in the General Plan EIR, scenic vistas within the City include scenic corridors and views to open spaces, canyonlands, hillsides, groves, and the San Bernardino Mountains. Current and future scenic drives are identified within Chapter 2, Distinctive City, of the General Plan. The General Plan indicates that specific development standards have been adopted by Resolution to protect identified scenic highways, drives, and historic streets.

The project site has a Home Depot to the north, a car dealership to the south, residential neighborhoods to the east, and the intersections of Interstate 10 (I-10) and I-210 and Tennessee Street to the west. California Department of Transportation has indicated I-10 near Redlands is a Scenic Highway location from milepost 0 to milepost 49.5 (Caltrans 2020). The project site is not visible from either scenic segment of highways. Although I-10 passes by the project area, the scenic segment starts approximately 0.67 miles to the southeast from the Project site. The scenic portion of the roadway is towards the east away from the Project site. Highway 38/Orange Street is an eligible scenic Highway on the California Department of Transportation (Caltrans) State Scenic Highway Map. This segment is approximately 0.82 miles northeast of the Project site over commercial buildings and

residential neighborhoods. As a result, implementation of the proposed project would not have a substantial adverse impact on a scenic vista character or damage scenic resources within a State scenic highway; therefore, impacts would be less than significant.

- b) *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

**Less Than Significant.** As described in a) above, the project site is surrounded by commercial businesses, freeways, and residential neighborhoods. The facility's maximum height at the peak of the roof is 27 feet and 4 inches, which would not block any scenic views due to the relatively flat topography of the site.

The proposed building facade will be earth-tone colored. Massing will be articulated by tonal color banding. All equipment on the roof will be screened with earth toned metal RTUs and parapet walls. These architectural treatments will be applied to all building facades to create a neutral, cohesive look. This architectural design will complement the neighboring businesses. The City of Redlands Architectural Guidelines encourages these design elements and provides a supplement to the development architectural standards of districts outside of the Downtown Area (City 2009). Therefore, the project would not degrade the existing visual character or public views of the site and surroundings resulting in a less than significant impact.

- c) *Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

**No Impact.** As described in a) above, the Project site is surrounded by commercial businesses, freeways, and residential neighborhoods. The project site is on relatively flat ground in the City. The facility has a maximum height of 27 feet and 4 inches and would not affect a scenic vista; therefore, there would be no impact.

- d) *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

**Less Than Significant.** The outdoor lighting will be LED lighting fixtures mounted on 26-foot poles for visibility and security. These fixtures will be shielded to reduce light spill onto adjacent properties. The proposed project would increase the amount of light in the area because it is a vacant lot with no lighting present. Construction may have security lighting during night hours. Refurbishing of vehicles would occur 24 hours a day, 7 days a week, resulting in an increase of lighting in the area. However, although the project area would increase lighting within the area, compliance with City standards for exterior lighting for new developments, as established by the City's General Plan Action 2-A.35, would reduce this impact to a less than significant level.

Additionally, due to the nature of the project, the proposed car retail facility could result in a new source of substantial glare. The project as proposed would conform to applicable zoning requirements, and specific plan requirements of adhering to all architectural standards to prevent the project from utilizing high gloss or reflective materials with properties that would have the potential to result in adverse glare effects. Additionally, the perimeter of the site will incorporate landscaping including trees and shrubs in accordance with specific plan requirements. With adherence to the City's

design standards and specific plan requirements, adverse effects associated with light and/or glare would be less than significant.

**4.2 AGRICULTURE & FORESTRY RESOURCES**

2.	<b>AGRICULTURE &amp; FOREST RESOURCES.</b> (In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)	Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or the conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**4.2.1 Impact Analysis**

a) *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

**No Impact.** Prime farmland is land that has a combination of characteristics to be used as cropland, pasture, rangeland, and forest land. According to the Department of Conservation (DOC) California Important Farmland Finder mapping system, the Project site is designated as grazing land. Grazing



land is defined as follows: “Land on which the existing vegetation is suited to the grazing of livestock. This category is used only in California and was developed in cooperation with the California Cattlemen’s Association, University of California Cooperative Extension, and other groups interested in the extent of grazing activities” (DOC 2022a).

The Proposed Project area is not zoned for agricultural or farmland use, nor is it proposed to be used for farming and other agricultural purposes. The Project site is proposed to be used for commercial purposes, which is consistent with the surrounding uses. The Project site is not designated as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland. Therefore, implementation of the proposed project would not convert Prime Farmland, Farmland of Statewide Importance, or Unique Farmland to a non-agricultural use. No impact would occur, and no mitigation is required.

b) *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

**No Impact.** While the DOC indicates that the Project site is designated as grazing land, the Project site is located within a commercial district of the Specific Plan (City 2006). It is not zoned for agricultural uses, nor is the Project being proposed to be rezoned for agricultural use. Therefore, the Proposed Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract.

c) *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?*

**No Impact.** The DOC designates the Project site to contain grazing land (DOC 2022a). However, the Project site is within the commercial district of the Specific Plan. While there is existing vegetation and trees along the outer boundaries of the Project site, the area is not designated for forest or timberland use. The trees would not be removed during construction. The Proposed Project would not conflict with existing zoning or cause rezoning of forest or timberland zones. Therefore, the Proposed Project would not conflict with existing zoning for forest or Timberland Production, resulting in no impact.

d) *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

**No Impact.** As discussed in the previous section, the Project site is not designated for forest or timberland use nor is it zoned for forest uses. The Project site is located within the commercial district of the Specific Plan and is proposed to be utilized for commercial purposes. Therefore, the Proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use due to its zoning and lack of forest habitats, resulting in no impact.

e) *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or the conversion of forest land to non-forest use?*

**Less than Significant Impact.** The Project site is zoned as commercial, with a home improvement retailer to the north, automobile dealership to the south, and undeveloped properties and various commercial buildings to the east. West of the Project site is the I-210. While there are existing vegetation and trees around the exterior of the Project boundary, the Project site is not zoned for farmland or forest uses. The Project proposes to utilize the site for automobile related operations.

The Proposed Project would not involve changes in the existing environment involving conversion of farm and forest land to non-agricultural and forest uses. Impacts therefore would be less than significant.

**4.3 AIR QUALITY**

3.	<b>AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:</b>	<b>Potentially Significant Impact</b>	<b>Less than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
(a)	Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**4.3.1 Impact Analysis**

Kimley-Horn and Associates, Inc. (Kimley-Horn) prepared an Air Quality Assessment for the proposed Project, dated May 2023. The Air Quality Assessment was prepared to evaluate the potential construction and operational emissions associated with the Proposed Project and determine the level of impact it would have on the environment. The results of the Air Quality Assessment indicate that the Proposed Project would have a less than significant impact with regard to air quality. The following impact analysis uses data from the Air Quality Assessment. The complete report can be found in Appendix A.

Kimley-Horn also completed a Health Risk Assessment (HRA) for the Proposed Project, dated January 2024. The purpose of this HRA is to evaluate potential health risks associated with Toxic Air Contaminants (TAC), including Diesel Particulate Matter (DPM), resulting from construction of the proposed Project. The HRA, located in Appendix B, was prepared in accordance with the requirements of the SCAQMD and guidance from the Office of Environmental Health Hazard Assessment (OEHHA) to determine if health risks are likely to occur from the Project.

*a) Would the project conflict with or obstruct implementation of the applicable air quality plan?*

**Less than Significant Impact.**

Climate and Meteorology

The California Air Resources Board (CARB) divides the State into 15 air basins that share similar meteorological and topographical features. The Project is located within the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, as well as all of Orange County. The SCAB is on a coastal plain connecting broad valleys and

low hills, bound by the Pacific Ocean on the southwest and high mountains forming the remainder of the perimeter. Air quality in this area is determined by natural factors such as topography, meteorology, and climate, in addition to the presence of existing air pollution sources and ambient conditions.

### Ambient Air Quality

CARB monitors ambient air quality at approximately 250 air monitoring stations across the State. These stations usually measure pollutant concentrations ten feet above ground level; therefore, air quality is often referred to in terms of ground-level concentrations. Existing levels of ambient air quality levels, historical trends, and projections near the Project are documented by measurements made by the SCAQMD, the air pollution regulatory agency in the SCAB that maintains air quality monitoring stations which process ambient air quality measurements. Pollutants of concern in the SCAB include ozone (O<sub>3</sub>), particulate matter 10 micrometers or less in diameter (PM<sub>10</sub>), and particulate matter 2.5 micrometers or less in diameter (PM<sub>2.5</sub>). The closest air monitoring station to the Project that monitors ambient concentrations of these pollutants is the Redlands-Dearborn Monitoring Station (located approximately 2.75 miles to the east of the Project site).

### Federal Clean Air Act

Air quality is federally protected by the Federal Clean Air Act (FCAA) and its amendments. Under the FCAA, the Environmental Protection Agency (EPA) developed the primary and secondary National Ambient Air Quality Standards (NAAQS) for the criteria air pollutants including O<sub>3</sub>, NO<sub>2</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and lead. Proposed projects in or near nonattainment areas could be subject to more stringent air-permitting requirements. The FCAA requires each state to prepare a State Implementation Plan to demonstrate how it will attain the NAAQS within the federally imposed deadlines.

The EPA can withhold certain transportation funds from states that fail to comply with the planning requirements of the FCAA. If a state fails to correct these planning deficiencies within two years of federal notification, the EPA is required to develop a federal implementation plan for the identified nonattainment area or areas. The provisions of 40 Code of Federal Regulations Parts 51 and 93 apply in all nonattainment and maintenance areas for transportation-related criteria pollutants for which the area is designated nonattainment or has a maintenance plan. The EPA has designated enforcement of air pollution control regulations to the individual states.

The EPA requires each state with nonattainment areas to prepare and submit a State Implementation Plan that demonstrates the means to attain the federal standards. The State Implementation Plan must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under State law, the California Clean Air Act (CCAA) requires an air quality attainment plan to be prepared for areas designated as nonattainment regarding the state and federal ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

The Project is located within the SCAB, which is under the jurisdiction of the SCAQMD. The SCAQMD is required, pursuant to the FCAA, to reduce emissions of criteria pollutants for which the SCAB is in nonattainment. To reduce such emissions, the SCAQMD drafted the 2016 and 2022 Air Quality Management Plans (AQMPs). The AQMPs establish a program of rules and regulations directed at reducing air pollutant emissions and achieving California Ambient Air Quality Standards (CAAQS) and

NAAQS. The AQMPs are a regional and multi-agency effort including the SCAQMD, the CARB, the Southern California Association of Governments (SCAG), and the EPA. The pollutant control strategies in the AQMPs are based on the latest scientific and technical information and planning assumptions, including SCAG's Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans. The Project is subject to the AQMPs.

### Analysis

The criteria for determining consistency with the AQMPs are defined by the following indicators:

- Consistency Criterion No. 1: The Project will not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMPs.
- Consistency Criterion No. 2: The Project will not exceed the assumptions in the AQMPs or increments based on the years of the Project build-out phase.

According to the SCAQMD's California Environmental Quality Act (CEQA) Air Quality Handbook, the purpose of the consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and thus if it would interfere with the region's ability to comply with California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The violations to which Consistency Criterion No. 1 refers are CAAQS and NAAQS.

**Table 1: Construction-Related Emissions**

Construction Year	Pollutant (Maximum Pounds per Day)					
	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO <sub>x</sub> )	Carbon Monoxide (CO)	Sulfur Dioxide (SO <sub>2</sub> )	Coarse Particulate Matter (PM <sub>10</sub> )	Fine Particulate Matter (PM <sub>2.5</sub> )
2023	4.04	39.84	37.09	0.06	9.70	5.65
2024	6.55	11.65	14.75	0.03	0.80	0.54
<i>SCAQMD Threshold</i>	<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>	<i>55</i>	<i>150</i>
<b>Exceed SCAQMD Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Notes: SCAQMD Rule 403 Fugitive Dust applied. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stockpiles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. Refer to [Appendix A](#) for Model Data Outputs.

Source: CalEEMod version 2022.1. Refer to [Appendix A: Air Quality Monitoring Data](#) for model outputs.

**Table 2: Operational Emissions**

Source	Pollutant (Maximum Pounds per Day)					
	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO <sub>x</sub> )	Carbon Monoxide (CO)	Sulfur Dioxide (SO <sub>2</sub> )	Coarse Particulate Matter (PM <sub>10</sub> )	Fine Particulate Matter (PM <sub>2.5</sub> )
Area Source Emissions	1.70	0.02	2.35	0.00	0.00	0.00
Energy Emissions	0.03	0.57	0.48	0.00	0.04	0.04
Mobile Emissions	3.04	3.44	30.60	0.08	6.48	1.68
Stationary Source Emissions - Generator	1.69	4.71	4.30	0.01	0.25	0.25
<b>Total Emissions</b>	<b>6.46</b>	<b>8.74</b>	<b>37.73</b>	<b>0.09</b>	<b>6.77</b>	<b>1.97</b>
<i>SCAQMD Threshold</i>	<i>55</i>	<i>55</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: CalEEMod version 2022.1. Refer to [Appendix A: Air Quality Monitoring Data](#) for model outputs.

**Table 3: Localized Significance of Construction Emissions**

Construction Activity	Pollutant (Maximum Pounds per Day)			
	Nitrogen Oxide (NO <sub>x</sub> )	Carbon Monoxide (CO)	Coarse Particulate Matter (PM <sub>10</sub> )	Fine Particulate Matter (PM <sub>2.5</sub> )
Site Preparation (2023)	39.74	35.47	9.47	5.60
Grading (2023)	37.30	31.41	5.18	2.89
Building Construction (2023)	11.81	13.17	0.55	0.51
Building Construction (2024)	11.22	13.12	0.50	0.46
Paving (2024)	7.81	10.03	0.39	0.36
Architectural Coating (2024)	0.91	1.15	0.03	0.03
<i>SCAQMD Localized Screening Threshold (adjusted for 4 acres at 200 meters)</i>	450	8,154	105	37
<b>Exceed SCAQMD Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: CalEEMod version 2022.1. Refer to [Appendix A: Air Quality Monitoring Data](#) for model outputs.

**Table 4: Localized Significance of Operational Emissions**

Activity	Pollutant (Maximum Pounds per Day)			
	Nitrogen Oxide (NO <sub>x</sub> )	Carbon Monoxide (CO)	Coarse Particulate Matter (PM <sub>10</sub> )	Fine Particulate Matter (PM <sub>2.5</sub> )
On-Site and Mobile Source Emissions <sup>1</sup>	5.64	10.19	0.94	0.46
<i>SCAQMD Localized Screening Threshold (Adjusted for 5 acres at 200 meters)</i>	486	9,044	28	10
<b>Exceed SCAQMD Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Notes:  
1. Conservatively assumes 10 percent of mobile emissions are on-site.

Source: CalEEMod version 2022.1. Refer to [Appendix A: Air Quality Monitoring Data](#) for model outputs.

As shown in Table 1, Table 2, Table 3, and Table 4 above, the Project would not exceed the construction standards, operational standards, or localized significance thresholds. Therefore, the Project would not contribute to an existing air quality violation. Thus, the Project would be consistent with the first criterion.

Concerning Consistency Criterion No. 2, the AQMPs contain air pollutant reduction strategies based on SCAG’s latest growth forecasts, and SCAG’s growth forecasts were defined in consultation with local governments and with reference to local general plans. The General Plan land use designation for the Project site is Commercial/Industrial and the zoning designation is General Commercial (EV/CG). The Project is consistent with the City’s General Plan land use designation and the zoning. As such, the Project would not result in substantial unplanned growth or unaccounted for growth in the General Plan used by the SCAQMD to develop the AQMPs. Thus, a less than significant impact would occur, as the Project is also consistent with the second criterion.

- b) *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*

**Less than Significant Impact.**

Air Pollutants of Concern

The air pollutants emitted into the ambient air by stationary and mobile sources are regulated by State and federal laws. These regulated air pollutants are known as “criteria air pollutants” and are categorized into primary and secondary pollutants.

Primary air pollutants are emitted directly from sources. Carbon monoxide (CO), reactive organic gases (ROG), nitrogen oxide (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), coarse particulate matter (PM<sub>10</sub>), fine particulate matter (PM<sub>2.5</sub>), and lead are primary air pollutants. Of these, CO, NO<sub>x</sub>, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> are primary criteria pollutants. ROG and NO<sub>x</sub> are criteria pollutant precursors and form secondary criteria pollutants through chemical and photochemical reactions in the atmosphere. A complete description of the pollutants, its man-made sources and potential human effects are provided in Table 1: Air Contaminants and Associated Public Health Concerns in Appendix A.

Toxic Air Contaminants

Toxic Air Contaminants (TACs) are airborne substances that can cause short-term (acute) or long-term (i.e. chronic, carcinogenic or cancer causing) adverse human health effects (i.e. injury or illness). TACs include both organic and inorganic chemical substances. They may be emitted from a variety of common sources including gasoline stations, automobiles, dry cleaners, industrial operations, and painting operations. The current California list of TACs includes more than 200 compounds, including particulate emissions from diesel-fueled engines.

Construction Emissions

Construction associated with the Project would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the Project area include O<sub>3</sub>-precursor pollutants (i.e., ROG and NO<sub>x</sub>) and PM<sub>10</sub> and PM<sub>2.5</sub>. Construction-generated emissions are short term, lasting only as long as construction activities occur, but would be a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD’s thresholds of significance.

Construction results in the temporary generation of emissions resulting from site grading, road paving, motor vehicle exhaust associated with construction equipment and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities, as well as weather conditions and the appropriate application of water.

Construction of the Project is anticipated to occur over an approximately 18-month period beginning in 2024 and ending in 2025. Construction-generated emissions associated with the Project were calculated using the CARB-approved California Emissions Estimator Model® (CalEEMod) computer program, which is designed to model emissions for land use development projects, based on typical construction requirements. See Appendix A: Air Quality Modeling Data for more information regarding the construction assumptions used in this analysis.

Fugitive dust emissions may have a temporary impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the Project vicinity. Uncontrolled dust from construction can become a nuisance and potential health hazard to those living and working nearby. SCAQMD Rules 402 and 403 (prohibition of nuisances, watering of inactive and perimeter areas, track out requirements, etc.), are applicable to the Project and were applied in CalEEMod to minimize fugitive dust emissions.

Table 1 shows that all criteria pollutant emissions would remain below their respective thresholds. While impacts would be less than significant, the Project would be subject to SCAQMD Rules for reducing fugitive dust, described in the Regulatory Framework in the report in Appendix A.

### Operational Emissions

The Project's operational emissions would be associated with area sources (e.g., landscape maintenance equipment, architectural coatings, off-road equipment, etc.), energy sources, and mobile sources (i.e., motor vehicle use). Primary sources of operational criteria pollutants are from motor vehicle use and area sources. Long-term operational emissions attributable to the Project are summarized in Table 2: Operational Emissions. The operational emissions sources are described below.

- **Area Source Emissions.** Area source emissions would be generated due to on-site equipment, architectural coating, and landscaping that were previously not present on the site.
- **Energy Source Emissions.** Energy source emissions would be generated due to electricity and natural gas usage associated with the Project. Primary uses of electricity and natural gas by the Project would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics.
- **Mobile Source.** Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> are all pollutants of regional concern. NO<sub>x</sub> and ROG react with sunlight to form O<sub>3</sub>, known as photochemical smog. Additionally, wind currents readily transport PM<sub>10</sub> and PM<sub>2.5</sub>. However, CO tends to be a localized pollutant, dispersing rapidly at the source.

Project-generated vehicle emissions are based on the trip generation within the Project's Traffic Scoping Agreement and incorporated into CalEEMod as recommended by the SCAQMD. Per the Traffic Scoping Agreement, the Project would generate a maximum of 715 daily trips.

As shown in Table 2, the Project's net operational emissions would not exceed SCAQMD thresholds for any criteria air pollutants. Therefore, long-term operational emissions would result in a less than significant impact.

### Cumulative Short-Term Emissions

The SCAB is designated nonattainment for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> for the CAAQS and nonattainment for O<sub>3</sub> and PM<sub>2.5</sub> for the NAAQS. Appendix D of the SCAQMD *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution-2003* notes that projects with emissions



that do not exceed the project specific SCAQMD regional thresholds of significance should result in a less than significant impact on a cumulative basis, unless there is other pertinent information to the contrary. The mass-based regional significance thresholds published by the SCAQMD are designed to ensure compliance with both NAAQS and CAAQS and are based on an inventory of projected emissions in the SCAB. Therefore, if a project is estimated to result in emissions that do not exceed the thresholds, the Project's contribution to the cumulative air quality impact in the SCAB would not be cumulatively considerable. As shown in Table 1 above, Project construction-related emissions by themselves would not exceed the SCAQMD significance thresholds for criteria pollutants. Therefore, the Project would not generate a cumulatively considerable contribution to air pollutant emissions during construction.

The SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMPs pursuant to the FCAA mandates. The analysis assumed fugitive dust controls would be utilized during construction, including frequent water applications. SCAQMD rules, mandates, and compliance with adopted emissions control measures would also be imposed on construction projects throughout the SCAB, which would include related projects. Compliance with SCAQMD rules and regulations would further reduce Project construction-related emissions. Therefore, Project-related construction emissions, combined with those from other projects in the area, would not substantially deteriorate local air quality. The Project's construction-related emissions would not result in a cumulatively considerable contribution to significant cumulative air quality.

#### Cumulative Long-Term Impacts

The SCAQMD has not established separate significance thresholds for cumulative operational emissions. The nature of air emissions is largely a cumulative impact. As a result, no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, individual project emissions contribute to existing cumulatively significant adverse air quality impacts. The SCAQMD developed the operational thresholds of significance based on the level above which individual project emissions would result in a cumulatively considerable contribution to the SCAB's existing air quality conditions. Therefore, a project that exceeds the SCAQMD operational thresholds would also be a cumulatively considerable contribution to a significant cumulative impact.

As shown in Table 2, the Project's net operational emissions would not exceed SCAQMD thresholds. As a result, operational emissions associated with the Project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Project operations would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant.

Therefore, the Proposed Project would not result in a cumulatively considerable net increase of criteria pollutants because the estimated construction and operational emissions would be below SCAQMD's thresholds. Impacts would be less than significant.

c) *Would the project expose sensitive receptors to substantial pollutant concentrations?*

**Less than Significant Impact.**

Sensitive Receptors

Sensitive populations are more susceptible to the effects of air pollution than is the general population. Sensitive receptors that are in proximity to localized sources of toxins are of particular concern. Land uses considered sensitive receptors include residences, schools, playgrounds, childcare centers, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. The Project site is mainly surrounded by commercial land uses to the north, east, and south, and vacant land and the I-10 and I-210 to the west. The nearest sensitive receptor is the single-family residences located 657 feet (200 meters) to the east of the Project site and approximately 740 feet to the northeast of the Project site. In addition, Orangewood High School, and Redlands eAcademy are located approximately 0.4 miles to the southeast of the Project site.

Localized Construction Significance Analysis

To identify impacts to sensitive receptors, the SCAQMD recommends addressing Local Significance Thresholds (LSTs) for construction. LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the Final Localized Significance Threshold Methodology (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with Project-specific emissions.

Since CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment, equipment-specific grading rates is used to determine the maximum daily disturbed acreage for comparison to LSTs. The appropriate State Responsibility Area (SRA) for the localized significance thresholds is the East San Bernardino Valley (SRA 35) since this area includes the Project. LSTs apply to CO, NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. The SCAQMD produced look-up tables for projects that disturb areas less than or equal to 5 acres in size. Project construction is anticipated to disturb a maximum of 4 acres in a single day during the grading phase. As the LST guidance provides thresholds for projects disturbing 1-, 2-, and 5-acres in size and the thresholds increase with the size of the site, the LSTs for a 4-acre threshold were interpolated and utilized for this analysis.

The SCAQMD's methodology states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs." Therefore, only emissions included in the CalEEMod "on-site" emissions outputs were considered. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. Therefore, LSTs for 200 meters were utilized in this analysis. Table 3: Localized Significance of Construction Emissions, shows the results of localized emissions during construction. This table represents the worst-case scenario and is based on peak earthwork volumes anticipated. As shown, localized Project construction emissions would not exceed SCAQMD thresholds. Impacts would be less than significant in this regard.

**Table 5: Equipment-Specific Grading Rates**

Construction Phase	Equipment Type	Equipment Quantity	Acres Graded per 8-Hour Day	Operating Hours per Day	Acres Graded per Day
Grading	Tractors	2	0.5	8	1
	Graders	1	0.5	8	0.5
	Dozers	1	0.5	8	0.5
	Scrapers	2	1	8	2
<b>Total Acres Graded per Day</b>					<b>4</b>

Source: CalEEMod version 2022.1. Refer to [Appendix A: Air Quality Monitoring Data](#) for model outputs.

Localized Operational Significance Analysis

According to the SCAQMD LST methodology, LSTs would apply to the operational phase of a project only if it includes stationary sources or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., warehouse or transfer facilities). Since the Project is an automobile sales and service facility, the operational phase LST protocol is conservatively applied to both the area source and mobile source emissions. As the nearest receptor is located approximately 657 feet (200 meters) from the Project site, LSTs for 200 meters for SRA 35 were used in this analysis. Although the Project site is approximately 18.56 acres, the 5-acre LST threshold was conservatively assumed for the Project, as the LSTs increase with the size of the site. Therefore, the 5-acre LSTs are conservative for evaluation of an 18.56-acre site.

The LST analysis only includes on-site sources. However, the CalEEMod model outputs do not separate on- and off-site emissions for mobile sources. For a worst-case scenario assessment, the emissions shown in Table 4: Localized Significance of Operational Emissions, conservatively include all on-site Project-related stationary sources and 10 percent of the Project-related new mobile sources, since a portion of mobile sources could include automobiles idling on-site. Table 4 shows that the maximum daily emissions of these pollutants during operations would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, significant impacts would not occur concerning LSTs during operational activities.

According to the SCAQMD AQMPs, ozone, NO<sub>x</sub>, and ROG have been decreasing in the SCAB since 1975 and are projected to continue to decrease in the future. Although vehicle miles traveled (VMT) in the SCAB continue to increase, NO<sub>x</sub> and ROG levels are decreasing because of the mandated controls on motor vehicles and the replacement of older polluting vehicles with lower-emitting vehicles. NO<sub>x</sub> emissions from electric utilities have also decreased due to the use of cleaner fuels and renewable energy. Appendix A provides further discussion regarding air quality modeling demonstrating NO<sub>x</sub> reductions.

As previously discussed, Project emissions would be less than significant and would not exceed SCAQMD thresholds. Localized effects of on-site Project emissions on nearby sensitive receptors were also found to be less than significant (refer to Table 3 and Table 4). The LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable CAAQS or NAAQS.

The LSTs were developed by the SCAQMD based on the ambient concentrations of that pollutant for each SRA and distance to the nearest sensitive receptor. The CAAQS and NAAQS establish the levels of air quality necessary, with an adequate margin of safety, to protect public health, including protecting the health of sensitive populations. Information on health impacts related to exposure to ozone and particulate matter emissions published by the EPA and CARB have been summarized in the Air Quality Assessment (Appendix A) and discussed in the Regulatory Framework section. The Project-related emissions would not exceed the regional thresholds or the LSTs, and therefore would not exceed the ambient air quality standards or cause an increase in the frequency or severity of existing violations of air quality standards. Therefore, the Project would not expose sensitive receptors to criteria pollutant levels in excess of the health-based ambient air quality standards.

### Carbon Monoxide Hotspots

An analysis of CO “hot spots” is needed to determine whether the change in the level of service of an intersection resulting from the Project would have the potential to result in exceedances of the CAAQS or NAAQS. It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined. Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard.

The SCAB was re-designated as attainment for CO in 2007 and is no longer addressed in the SCAQMD’s AQMP. The 2003 AQMP is the most recent version that addresses CO concentrations. As part of the SCAQMD CO Hotspot Analysis, the Wilshire Boulevard/Veteran Avenue intersection, one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 ppm, which is well below the 35-ppm NAAQS.

The Project would not produce the volume of traffic required to generate a CO hot spot in the context of SCAQMD’s CO Hotspot Analysis. As CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection even though it accommodates 100,000 vehicles daily, it can be reasonably inferred that CO hotspots would not be experienced at any Project area intersections resulting from 715 additional vehicle trips attributable to the Project.

### Health Risk Assessment

As described in Appendix B, health risks were analyzed at the point of maximum impact and are a conservative estimate. The pollutant concentrations are used to estimate the long-term cancer health risks to an individual as well as the non-cancer chronic health index associated with construction of the proposed project. The cancer and chronic health risks are based on the annual average concentration of PM<sub>10</sub> (used as a proxy for DPM). As the Project is proposed near existing sensitive receptors (single-family residences), an analysis of DPM was performed using the EPA-approved AERMOD model (Appendix B).

Construction-related activities would result in Project-generated DPM emissions from the exhaust of offroad, heavy-duty diesel equipment for site preparation (e.g., clearing, grading); paving; application of architectural coatings; and on-road truck travel. For construction activity, DPM is the primary toxic

air contaminant of concern. Exposure duration is based on continual heavy truck operation along nearby roadways.

Table 6 shows the health risk for Project construction for residential and school receptors. Based on OEHHA *Risk Assessment Guidelines*, the exposure duration for a resident is 18 months (the duration of construction activity). As shown in Table 6, the unmitigated construction risk at residential and school receptors would be 1.56 in one million and 0.21 in one million, respectively, which would not exceed the maximum individual cancer risk of 10 in one million. Therefore, Project impacts associated with carcinogenic risk would be less than significant.

**Table 6: Unmitigated Carcinogenic Risk Assessment**

Exposure Scenario (Construction)	Cancer Risk (Risk per Million) <sup>1</sup>	Significance Threshold (Risk per Million)	Exceeds Significance Threshold?
Residential	1.56	10	No
Student	0.21		No

1. The reported annual pollutant concentration is at the closest maximally exposed individual receptor (MEIR) for residential and schools to the Project site.

Source: Refer to Appendix A: Modeling Data in IS/MND Appendix B.

Appendix B goes on to discuss that the significance thresholds for TAC exposure also require an evaluation of non-cancer risk stated in terms of a hazard index. A chronic hazard index of 1.0 is considered individually significant. The chronic hazard was calculated based on the highest annual average concentration at the maximally exposed individual receptor. The highest maximum chronic hazard index associated with DPM emissions from Project construction would be 0.0014 at the residential receptors and 0.0002 at school receptors.

Therefore, as discussed above, the Proposed Project would not result in significant concentrations of pollutants at nearby sensitive receptors during construction and operational activities and would not exceed SCAQMD thresholds. Furthermore, the Proposed Project would not create a significant volume of traffic that would create a CO hot spot within the area. Impacts therefore would be less than significant. Project impacts associated with carcinogenic risk would be less than significant. In addition, non-carcinogenic hazards within acceptable limits and a less than significant impact would occur.

*d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

**Less than Significant Impact.**

Construction

Odors that could be generated by construction activities are required to follow SCAQMD Rule 402 to prevent odor nuisances on sensitive land uses. SCAQMD Rule 402, Nuisance, states:

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons

or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

Construction equipment emissions, such as diesel exhaust, and volatile organic compounds from architectural coatings and paving activities, may generate odors. However, these odors would be temporary, are not expected to affect a substantial number of people and would disperse rapidly. Therefore, Project construction activities would not result in objectionable odors that would adversely affect a substantial number of people, and impacts would be less than significant.

Operations

The SCAQMD CEQA Air Quality Handbook identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Project would not include any of the land uses that have been identified by the SCAQMD as odor sources. Therefore, Project operations would not result in odors that would adversely affect people. Impacts would be less than significant.

**4.4 BIOLOGICAL RESOURCES**

4.	<b>BIOLOGICAL RESOURCES. Would the project:</b>	<b>Potentially Significant Impact</b>	<b>Less than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
(a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### 4.4.1 Impact Analysis

Chambers Group conducted a reconnaissance-level survey and prepared a Biological Resources Letter Report for the Proposed Project dated January 2024. The Biological Resources Letter Report was prepared to summarize the existing vegetation communities, identify special status species that have potential to occur, and identifying potentially jurisdictional water features within the Proposed Project and Project site to determine the level of impact construction and operation of the project would have on biological resources. The complete report can be found in Appendix C.

- a) *Would the project have a substantial adverse effect, either directly or through habitat modification, on any species identified as candidate, sensitive or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

#### **Less than Significant Impact with Mitigation Incorporated.**

##### Vegetation Communities and Other Areas

One vegetation community and one land cover type were found within the Project site during the biological reconnaissance survey: Ruderal and Developed.

**Ruderal:** Areas classified as Ruderal tend to be dominated by pioneering herbaceous species that readily colonize disturbed ground and that are typically found in temporary, often frequently disturbed habitats.

**Developed:** Developed areas are those that have been altered by humans and now display man-made structures such as houses, paved roads, sidewalks, buildings, parks, and other maintained areas.

The majority of the Project site is comprised of Ruderal vegetation with Developed areas bordering the eastern side.

##### General Plants

A total of 16 plant species were observed within the Project site during the biological reconnaissance survey. Plant species observed during the survey were representative of the existing Project site conditions. No special status plant species were observed during the survey.

##### General Wildlife

A total of eight wildlife species were observed within the Project site during the biological reconnaissance survey. Wildlife species observed or detected during the survey were characteristic of the existing Project site conditions. No special status wildlife species were observed or detected during the survey.

##### Special Status Plant Species

Database searches resulted in a list of 54 federal- and/or state-listed threatened, endangered, or otherwise special status plant species documented to historically occur within the vicinity of Project site. Of the 54 special status plant species identified in the literature review, all 54 of the plants are considered absent within the Project site. No special status plant species were found during the biological reconnaissance survey.



### Special Status Wildlife Species

Database searches resulted in a list of 48 federal- and/or state-listed endangered or threatened, state SSC, or otherwise special status wildlife species documented to occur within the Project site. After a literature review and the assessment of the various habitat types within the Project site, it was determined that 47 special status wildlife species are considered absent; one has a low potential to occur within the Project site, the burrowing owl (*Athene cunicularia*) (BUOW). No special status wildlife species were found during the biological reconnaissance survey.

The BUOW is a California special species of concern (SSC). The BUOW breeds in open plains from western Canada and the western United States, Mexico through Central America, and into South America to Argentina. This species inhabits dry, open, native, or non-native grasslands, deserts, and other arid environments with low-growing and low-density vegetation. It may occupy golf courses, cemeteries, road rights-of way, airstrips, abandoned buildings, irrigation ditches, and vacant lots with holes or cracks suitable for use as burrows. BUOWs typically use burrows made by mammals such as California ground squirrels (*Otospermophilus beecheyi*), foxes (*Vulpes sp.*), or badgers (*Mustelidae sp.*). When burrows are scarce, the BUOW may use man-made structures such as openings beneath cement or asphalt pavement, pipes, culverts, and nest boxes. Ground squirrel burrows were observed on the Project site but due to recent tilling and mowing activities, most of these burrows were collapsed. If ground disturbance becomes infrequent and species are able to create burrows (and those burrows persist), it may create a habitat that could support BUOW. BUOW have also been recorded within 4.44 miles of the Project site. Although no BUOW or sign (burrows with whitewash, pellets, feathers etc.) were observed during the survey, the following measures are recommended in accordance with the California Department of Fish and Wildlife's (CDFW) Staff Report on Burrowing Owl Mitigation:

**MM BIO-1      Preconstruction Survey.** A preconstruction BUOW survey shall be conducted no less than 14 days prior to initiating ground disturbance (including clearing, grubbing, grading), and a final survey within 24 hours prior to ground disturbance, to determine whether BUOW or BUOW burrows are present within or adjacent to the Project site, and to avoid negative impacts and direct take of BUOW. If BUOW are confirmed on-site, avoidance measures will be developed and implemented in compliance with and in coordination with CDFW. The results of the survey shall be documented and filed with the City.

### US Fish and Wildlife (USFWS) Critical Habitat

USFWS Critical Habitat is defined as areas of land, water, and air space containing the physical and biological features essential for the survival and recovery of endangered and threatened species. Designated Critical Habitat includes sites for breeding and rearing, movement or migration, feeding, roosting, cover, and shelter. Designated Critical Habitats require special management and protection of existing resources, including water quality and quantity, host animals and plants, food availability, pollinators, sunlight, and specific soil types. Designated Critical Habitat delineates all suitable habitat, occupied or not, that is essential to the survival and recovery of the species. According to the USFWS Critical Habitat WebGIS map, the Project site does not fall within Designated Critical Habitat. The closest USFWS Designated Critical Habitat is for San Bernardino kangaroo rat and occurs approximately 1.25 miles north of the Project site.



### Special Status Habitats

Database searches resulted in a list of four special status habitats documented historically as occurring within the vicinity (approximately 5 miles) of the Project site, including: Riversidian Alluvial Fan Sage Scrub, Southern Mixed Riparian Forest, Southern Riparian Scrub, and Southern Sycamore Alder Riparian Woodland. After the literature review and the assessment of the habitat types within the Project site, it was determined that none of these communities were present within the Project site.

### Nesting Birds

Most bird nests are protected under the Migratory Bird Treaty Act (MBTA). The MBTA states that it is unlawful to pursue, hunt, take, capture, kill, attempt to take, possess, sell, or export any migratory bird, nest, or egg. To avoid the destruction of active nests and to protect the reproductive success of birds protected under the MBTA, the Project will implement the following mitigation to address potential impacts to nesting birds.

**MM BIO-2 Nesting Bird Survey.** Construction activities shall take place outside nesting season (nesting typically February 1 to August 31) to the greatest extent practicable. If construction activities occur during nesting season, a preconstruction nesting bird survey shall be conducted within seven days prior to initiation of ground-disturbing activities (including any clearing, grubbing, or grading), or according to the survey timing in the Project permits. If an active nest is identified, a minimum avoidance buffer around the active nest should be determined and implemented by a qualified biologist to avoid impacts to the active nest. The buffer shall be established with flagging and stakes or construction fencing. A minimum 100-foot no-disturbance buffer shall be placed around passerine nests. For raptors, the no-disturbance buffer shall be expanded to 500 feet. The buffer should be maintained during physical ground-disturbing activities. Once the qualified biologist has determined that nesting has ceased, and the nestlings have fledged and are no longer using the nest, the buffer may be removed. Biological monitoring should be conducted as needed during the nesting season to monitor the status of any active nests, survey for any new nests, and to refresh nesting bird surveys after any periods of construction inactivity. The results of the survey shall be documented and filed with the City.

Based on the desktop research and survey of the Project site, the Proposed Project would not result in a substantial adverse effect on candidate, sensitive or special status species based on the condition of the Project site and implementation of the mitigation measures discussed above. Impacts therefore would be less than significant.

- b) *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

**Less than Significant Impact.** As reported in the Biological Resources Letter Report (Appendix C), the closest water features mapped by the National Wetlands Inventory (NWI) and National Hydrography Dataset (NHD), both riverine, are over a half mile from the Project site: the Santa Ana River to the north, and the Mission Flood Control Ditch to the south. Because both features are located well outside of the Project site boundary and no work would be conducted within or directly adjacent to either feature, no impacts to these features would occur as a result of this Project. Additionally, there are no riparian, wetland, or vernal pool habitats found within or adjacent to the Project site.

A potentially jurisdictional drainage identified on aerial imagery during the literature search is located west (outside) of the Project site and east of I-210. This feature is a channelized, concrete-lined drainage that is located approximately 15 feet from the northwestern corner of the Project site at its closest point. The drainage begins west of New York Street just north of I-10 and continues for approximately 2 miles, generally paralleling I-210, before connecting to the Santa Ana River. The channel appears to transition from a concrete-lined channel to an earthen channel (the last approximately 0.45 mile before joining the Santa Ana River) near Domestic Avenue and becomes more vegetated at this point. The field survey confirmed the presence of this drainage west of the Project site. As the Project site is fenced on the west side, the biologists were not able to inspect the drainage feature up close but noted that the feature was concrete lined and appeared to be dry. As mentioned, this drainage is outside of the Project site and would not be directly affected by the Project based on current Project design.

The Proposed Project would not result in significant impacts to riparian or other sensitive natural community due to its location. Therefore, the impacts would be less than significant.

- c) *Would the project have a substantial adverse effect on state or federally protected wetlands (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

**Less than Significant Impact.** As discussed in the previous section, and in the Biological Resources Letter Report, the Proposed project would not result in impacts to protected wetlands. There are no wetlands found within the Project site as it is located inland within the City, and the proposed construction and operational activities would not involve any removal or filling of any wetlands, marsh, vernal pool, or other coastal habitats. While there is a potential jurisdictional drainage found during the review of the aerial images, this is located outside of the Project boundary. Because of the lack of wetlands at and nearby the Project site, impacts would be less than significant.

- d) *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

**No Impact.** As summarized in the Biological Resources Letter Report (Appendix C), the Project site does not fall within the USFWS Designated Critical Habitat. The area does not contain any suitable habitat for migratory fish or wildlife. The Project site is a vacant and undeveloped parcel of land located within an urbanized area of the City. There are various commercial buildings and a freeway that border the Project site that is frequently disturbed. There are no water bodies or open space habitats. Therefore, the Proposed Project would not result in interfering the movement of migratory species. No impact would occur.

- e) *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

**Less than Significant Impact.** The City's General Plan outlines various preservation policies and ordinances to protect the City's resources. Preservation guidelines for the City's distinct elements include preservation of older neighborhoods, street trees and streetscapes, Citrus Groves, and managing activities within the Santa Ana River Wash and Upper Santa Ana River Land Management Habitat Conservation Plan. The Proposed Project would not conflict with any local policies or

ordinances because the Project will not affect or interfere with the preservation guidelines within the General Plan and the proposed work will not occur within these distinct areas. Additionally, the trees present on the perimeter of the Project site will be protected during construction and will not be removed as part of the Project. Therefore, the impacts would be less than significant.

f) *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservancy Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

**Less than Significant Impact.** The Proposed Project is not located within the Upper Santa Ana River Habitat Conservation Plan area or other opens spaces areas within the County. The Project site does not contain sensitive habitats or areas that are part of a conservation plan. Impacts therefore would be less than significant.

**4.5 CULTURAL RESOURCES**

5.	CULTURAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c)	Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**4.5.1 Impact Analysis**

Chambers Group conducted a cultural resources survey and prepared a Cultural Resource Survey and Study Letter Report (Cultural Report) for the Proposed Project dated December 2023. The Cultural Report was prepared to gather and analyze information needed to assess the potential impacts to cultural resources within the Project site. The results of the Cultural Report indicate that there was no archival evidence found of cultural or paleontological resources within the Project site. However, during the survey, remnants of historic-age features were observed. While no evidence of paleontological resources was observed during the survey, background research and National History Museum of Los Angeles County (NHMLA) records indicate moderate sensitivity for fossil localities within the Project site and its study area. Although the Project site has evidence of past disturbance and while the potential for encountering intact resources within the upper sediments is low, the possibility of buried resources being identified below surface disturbances is not diminished. Research indicates geologic units known to be fossil-bearing underlay the Project site and could be encountered during Project-related ground-disturbing construction activities. Thus, there remains potential that buried cultural and paleontological resources could be encountered during the Project and would therefore require implementation of mitigation measures to result in less than significant impacts. The complete Cultural Report can be found in Appendix D.

a) *Would the project cause a substantial adverse change in the significance of a historical resource?*

**Less than Significant Impact.**

Regulatory Context

As the CEQA lead agency for the Project, the City must determine whether a project may have a significant effect on historical resources (Public Resources Code [PRC] Section 21084.1). In addition to State of California (State) and County regulations, projects in the City are also subject to several local regulations relating to cultural resources. Chapter 2 of the City of Redlands' General Plan pertains specifically to the identification and protection of cultural, historical, archaeological, and paleontological resources within the City. The regulatory framework as it pertains to cultural resources is detailed in Appendix D.

Under the provisions of CEQA, including the CEQA Statutes (PRC §§ 21083.2 and 21084.1), CEQA Guidelines (Title 14 California Code of Regulations [CCR] § 15064.5), and PRC § 5024.1 (Title 14 CCR § 4850 et seq.), properties expected to be directly or indirectly affected by a proposed project must be evaluated for eligibility for listing in the California Register of Historical Resources (CRHR).

California Register of Historical Resources

The purpose of the CRHR is to maintain listings of the State's historical resources and to indicate which properties are to be protected, to the extent prudent and feasible, from material impairment and substantial adverse change. The term "historical resources" includes a resource listed in or determined to be eligible for listing in the CRHR; a resource included in a local register of historical resources; and any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (CCR § 15064.5[a]). The criteria for listing properties in the CRHR were expressly developed in accordance with previously established criteria developed for listing in the National Register of Historic Places (NRHP). The California Office of Historic Preservation (OHP 1995:2) regards "any physical evidence of human activities over 45 years old" as meriting recordation and evaluation.

A cultural resource is considered "historically significant" under CEQA if the resource meets one or more of the criteria for listing in the CRHR. A resource is considered significant if it:

1. is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. is associated with the lives of persons important in our past;
3. embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. has yielded, or may be likely to yield, information important in prehistory or history.
5. In addition to meeting one or more of the above criteria, historical resources eligible for listing in the CRHR must retain enough of their historic character or appearance to be able to convey the reasons for their significance. Such integrity is evaluated in regard to the retention of location, design, setting, materials, workmanship, feeling, and association.

Impacts that adversely alter the significance of a resource listed in or eligible for listing in the CRHR are considered a significant effect on the environment. Impacts to historical resources from a proposed project are thus considered significant if the project:

1. physically destroys or damages all or part of a resource;

2. changes the character of the use of the resource or physical feature within the setting of the resource, which contributes to its significance; or
3. introduces visual, atmospheric, or audible elements that diminish the integrity of significant features of the resource.

### Study Methods

Chambers Group requested a records search from the California Historical Resources Information System (CHRIS) South-Central Coastal Information Center (SCCIC) at California State University, Fullerton, on October 9, 2023. A records search of the Project site and surrounding study area was requested to provide context and additional information regarding types and extent of resources recorded within the Study area.

Resources consulted during the records search conducted by the SCCIC included the NRHP, California Historical Landmarks (CHL), California Points of Historical Interest (CPHI), Caltrans Historic Highway Bridge Inventory, the California State Historic Resources Inventory, local registries of historic properties, and a review of available Sanborn Fire Insurance maps as well as historical photographs, maps, and aerial imagery. The task also included a search for potential prehistoric and/or historic burials (human remains) evident in previous site records and/or historical maps. In addition, Chambers Group submitted a request to the NAHC for a review of the Sacred Land Files (SLF) for the Project site and surrounding vicinity.

### Results

#### *Previous Cultural Resources Reports*

Based on the records on-file with the SCCIC, seven cultural resource studies have previously been completed within the study area. Of these seven reports, one is within the Project site of a half-mile radius (SB-01783, Seven Oaks Dam Project; Water Systems).

#### *Previously Recorded Cultural Resources*

Based upon the records search conducted by the SCCIC, 17 previously recorded cultural resources are recorded within the study area. None are located within the Project site.

#### *Additional Background Research Results*

In addition to the records search review, Chambers Group archaeologists completed background research to determine if any additional historic properties, landmarks, bridges, or other potentially significant or listed properties are located within the Project site or within the study area. This background research included, but was not limited to, the NRHP, California State Historic Property Data Files, California State Historical Landmarks, CPHI, OHP Archaeological Determinations of Eligibility, historic aerial imagery accessed via NETR Online, Historic U.S. Geological Survey topographic maps, Built Environment Resource Directory (BERD), Caltrans, and State and local bridge surveys. Additionally, Chambers Group archaeologists reviewed the San Bernardino County Historical Landmarks inventory designated by the County of San Bernardino Cultural Heritage Board as well as the San Bernardino Historical Society and local historical newspaper clippings via Newspapers.com, ProQuest Historical Newspapers.com, and the California Digital Newspaper Collection. As a result of the records search review and archival research, no previously recorded resources or other listed or potentially significant properties are recorded within the Project site.

### *Field Survey Results*

Chambers Group conducted a pedestrian survey of the Project site in December 2023. The Project site is an open field with evidence of recent discing and historic agricultural activity. Existing vegetation comprise low-growing grasses, and ground visibility varies between 30 and 80 percent across the parcels. Several collection piles of finished concrete debris, cobble rocks, and modern trash were observed scattered throughout the site.

A wastewater line, as delineated by a series of square concrete pads encasing steel covers marked with an “S,” was observed traversing the Project site. There are no date stamps evident, however, their construction appears to be modern, and the alignment appears to conform with a similar series of “S”-marked covers located within the east/west trending W Brockton Avenue. Two on-ground and in-ground features were observed south of the wastewater alignment. These appear to be earlier constructed features that have been heavily impacted and subsequently demolished in part.

As a result of the systematic survey of the Project site, Chambers Group identified two historic-age features. These new resources are documented with the temporary identification 21450-CGI-001S and recorded on California Department of Parks and Recreation (DPR) 523 series forms which are confidential and will be submitted to the SCCIC as required.

When assessing 21450-CGI-001S for potential significance under CEQA, it does not appear to meet the criteria for inclusion in the CRHR. Based on the documented surface assemblage and additional background research, 21450-CGI-001S does not represent any association with events contributing to California’s history and cultural heritage (Criterion 1); an association with the lives of persons important to our past (Criterion 2); embody the distinctive characteristics of a type, period, region, method of construction, or work of an important individual (Criterion 3); or has yielded, or may be likely to yield, information important in prehistory or history (Criterion 4). While additional construction and household refuse was observed near and around feature A, no temporally diagnostic material that can provide a rough manufacture date or date range was observed. In addition, there is no indication that the refuse material is in a primary context and could easily have been redeposited from another location. Further, the two features composing the site are ubiquitous to the area and within the context of the documented historic-period agricultural land use, and do not represent any unique features, qualities, or associations that would answer important scientific research questions of demonstratable public interest.

Based on the condition of the site, along with the results provided in the Cultural Report, the Proposed Project would not result in substantial adverse change in the significance of a historical resource because the historic-age features identified on-site do not meet the criterion pursuant to 15064.5. Impacts therefore would be less than significant.

- b) *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

### **Less than Significant Impact with Mitigation Incorporated.**

Under CEQA, if an archeological site is not a historical resource but meets the definition of a “unique archeological resource” as defined in PRC § 21083.2, then it should be treated in accordance with the provisions of that section. A unique archaeological resource is defined as follows:



An archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
- Has a special and particular quality, such as being the oldest of its type or the best available example of its type; and
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Resources that neither meet any of these criteria for listing in the CRHR nor qualify as a “unique archaeological resource” under CEQA PRC § 21083.2 are viewed as not significant. Under CEQA, “A non-unique archaeological resource need be given no further consideration, other than the simple recording of its existence by the lead agency if it so elects” (PRC § 21083.2[h]). Detailed archaeological history is provided in the Cultural Report in Appendix D.

Although the Project site has evidence of past disturbance and while the potential for encountering intact resources within the upper sediments is low, the possibility of buried resources being identified below surface disturbances is not diminished. Research indicates geologic units known to be fossil-bearing underlay the Project site and could be encountered during Project-related ground-disturbing construction activities. Therefore, the Proposed Project shall implement the following mitigation measures to ensure potential impacts to the discussed resources would be less than significant.

**MM CUL-1 Retain Cultural Resource Monitor.** The Applicant shall retain the services of a qualified cultural resources consultant and require that all initial ground disturbing work be monitored by a cultural resources monitor. This includes all initial construction activities that will potentially expose or encounter intact subsurface sediments underlying the Project site. The cultural resources consultant shall provide a Qualified Archaeologist, meeting the Secretary of the Interior Standards (U.S. Department of the Interior, 2008), and require that all initial ground-disturbing work be monitored by a cultural resources monitor (monitor) proficient in artifact and feature identification in monitoring contexts. The Consultant (Qualified Archaeologist and/or monitor) shall be present at the Project construction phase kickoff meeting.

**MM CUL-2 WEAP Training.** Prior to commencing construction activities and thus prior to any ground disturbance in the Proposed Project site, the Consultant shall conduct initial Worker Environmental Awareness Program (WEAP) training to all construction personnel, including supervisors, present at the outset of the Project construction work phase, for which the lead contractor and all subcontractors shall make their personnel available. This WEAP training will educate construction personnel on how to work with the monitor(s) to identify and minimize impacts to cultural resources and maintain environmental compliance and be performed periodically for new personnel coming on to the Project as needed.

**MM CUL-3 Monitor Schedule Notification.** The contractor shall provide the Consultant with a schedule of initial potential ground disturbing activities. A minimum of 48-hours’ notice will be provided to the archaeological consultant of commencement of any initial ground disturbing activities that have potential to expose or encounter intact

subsurface sediments underlying the Project site. These activities may include grading, trenching, and mass excavation.

As detailed in the schedule provided, a monitor shall be present on-site at the commencement of ground-disturbing activities related to the Project. The Consultant shall observe initial ground disturbing activities and, as they proceed, adjust the monitoring approach as needed to provide adequate observation and oversight. All monitors will have stop-work authority to allow for the recordation and evaluation of finds during construction. The monitor will maintain a daily record of observations as an ongoing reference resource and to provide a resource for final reporting upon completion of the Project.

The Consultant, the lead contractor, and subcontractors shall maintain a line of communication regarding schedule and activity such that the Consultant is aware of all ground-disturbing activities in advance in order to provide appropriate oversight.

**MM CUL-4 Monitoring Report.** At the completion of all ground disturbing activities, the Consultant shall prepare a Cultural Resources Monitoring Report summarizing all monitoring efforts and observations, as performed, and any and all prehistoric or historic archaeological finds, as well as providing follow-up reports of any finds to the SCCIC, as required.

c) *Would the project disturb any human remains, including those interred outside of formal cemeteries?*

**Less than Significant Impact.** The Project site is vacant and undeveloped. While there was no evidence found of cemeteries located on the Project site, there are possibilities of buried remains to be discovered during ground disturbing activity.

In the event that human remains are discovered during ground-disturbing activities, then the proposed Project would be subject to California Health and Safety Code 7050.5, CEQA Section 15064.5, and California PRC Section 5097.98. If human remains are found during ground-disturbing activities, State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner shall be notified immediately. If the human remains are determined to be prehistoric, the County Coroner shall notify the NAHC, which shall notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Following the existing state regulations would result in less than significant impacts associated with disturbance of human remains during project construction.

**4.6 ENERGY**

6.	<b>ENERGY</b> Would the project:	<b>Potentially Significant Impact</b>	<b>Less than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
(a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



6.	<b>ENERGY</b> Would the project:	<b>Potentially Significant Impact</b>	<b>Less than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
(b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**4.6.1      Impact Analysis**

a) *Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

**Less Than Significant Impact.** Energy source emissions would be generated due to electricity and natural gas usage associated with the Project. Primary uses of electricity and natural gas by the Project would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics.

The Proposed Project would impact energy resources during construction and operation. Energy resources that would potentially be impacted include electricity and petroleum-based fuel supplies and distribution systems. A general definition of each of these energy resources is provided below.

Electricity is a man-made consumptive utility. The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. The delivery of electricity involves a number of system components, including substations and transformers that lower transmission line power to an appropriate level for on-site distribution and use. The electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid. Conveyance of electricity through transmission lines is typically responsive to market demands.

Petroleum-based fuels currently account for a majority of California’s transportation energy sources and primarily consist of diesel and gasoline types of fuels. However, the state has been working on developing strategies to reduce petroleum use. Over the last decade, California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and greenhouse gases (GHGs) from the transportation sector, and reduce VMT. Accordingly, petroleum-based fuel consumption in California has declined.

**Construction**

The Proposed Project would consume energy resources during construction in three general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment on the Project site, construction worker travel to and from the Project site, as well as delivery and haul truck trips (e.g., hauling demolition material to off-site reuse and disposal facilities).
2. Electricity associated with the conveyance of water that would be used during Proposed Project construction for dust control (supply and conveyance) and electricity to power any necessary lighting during construction, electronic equipment, or other construction activities necessitating electrical power.
3. Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Project construction activities would require energy consumption that would not result in an adverse impact on available energy supplies and infrastructure. Energy consumed during construction would be obtained from the existing electrical and gas lines in the vicinity of the Project and would be temporary. Project construction would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, and impacts are less than significant.

#### Operations

The ongoing operation of the Proposed Project would require the use of energy resources. Long term operations would require use of energy resources for heating, ventilation, air conditioning (HVAC), lighting, use of appliances, electronics, office equipment, vehicle charging spaces, and use of the car wash and detailing services. Appendix A of the Air Quality Assessment provides the following electricity/energy uses during operations of the Proposed Project.

**Table 7: Electricity (kWh/yr) and Natural Gas (kBTU/yr)**

Land Use	Electricity (kWh/yr)	Natural Gas (kBTU/yr)
General Office Building	199,021	312,926
Other Asphalt Surfaces	0.00	0.00
Parking Lot	199,188	0.00
Automobile Care Center	406,402	1,827,377
<b>Total</b>	<b>804,611</b>	<b>2,140,303</b>
San Bernardino County annual consumption (non-residential)	10,327 GWh/year (millions of kWh per year)	2.94e10 kBTU
kWh = kilowatt hours GWh = gigawatt hours kBTU = kilo British thermal units		

The total electricity consumption of Project operations is estimated to be 0.0078% of the total electricity, and 0.0072% of the total gas consumption for non-residential uses in San Bernardino County’s as of 2022 (CEC 2024). The Proposed Project would comply with all federal, state, and county requirements related to the consumption of transportation energy, including California Code of Regulations Title 24, Part 11, the CALGreen Code. Additionally, the Proposed Project shall comply with the City’s policies related to energy efficiency and conservation as outlined in their Sustainable Community Chapter of the General Plan with the following actions (City 2018).

**8-A.7** Seek alternatives to reduce non-renewable energy consumption attributable to transportation within the Planning Area. Seek funding and other assistance from the South Coast Air Quality Management District (AQMD) for installation of electric vehicle charging stations at appropriate locations throughout the city.

**8-A.8** Implement and enforce California Code of Regulations Title 24 building standards (parts 6 and 11) to improve energy efficiency in new or substantially remodeled construction. Consider implementing incentives for builders that exceed the standards included in Title 24 and recognize their achievements above the minimum standards.

**8-A.9** Encourage the use of construction, roofing materials, and paving surfaces with solar reflectance and thermal emittance values per the California Green Building Code (Title 24, Part 11 of the California Code of Regulations) to minimize heat island effects.

**8-A.10** Integrate trees and shade into the built environment to mitigate issues such as stormwater runoff and the urban heat island effect.

Therefore, construction and operational impacts regarding wasteful and inefficient consumption of energy, and conflicts with an applicable renewable energy or energy efficiency plan, would be less than significant.

b) *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

**Less than Significant Impact.** As discussed in the Air Quality section, the Proposed Project will not conflict with implementation of applicable air quality plans. Additionally, the City adopted a Climate Action Plan (CAP) that provides a long-range plan to reduce local GHG emissions. This includes indirect emission associated with the consumption of energy such as electricity. As noted in the CAP, “The City will update the GHG inventory periodically. If an updated inventory reveals that Redlands is not making adequate progress toward meeting the GHG target, or that new technologies and programs emerge that warrant inclusion in the CAP, the City will adjust the CAP by modifying, adding, and/or replacing policies in the General Plan or elsewhere, or incorporating optional measure(s) to further reduce emissions outlined in Section 4 of this CAP.” The CAP outlines several measures that include energy efficiency retrofits and efficient lighting standards. The Redlands Community Sustainability Plan (RCSP) was published in 2011. It is intended as a conceptual framework for sustainability policy. Actions related to water conservation, green buildings, waste reduction, climate friendly purchasing, renewable energy, carbon emissions, and land use are outlined in the RCSP (City 2018).

The Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. In addition to implementing the CAP and RCSP, the Proposed Project would be consistent with the principle below from the City’s Sustainable Community Plan:

**8-P.1:** Promote energy efficiency and conservation technologies and practices that reduce the use and dependency of nonrenewable resources of energy by both City government and the community.

The Proposed Project would be consistent with all applicable energy-related policies from the General Plan. Therefore, the Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

**4.7 GEOLOGY AND SOILS**

7.	<b>GEOLOGY AND SOILS. Would the project:</b>	<b>Potentially Significant Impact</b>	<b>Less than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
(a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

7.	<b>GEOLOGY AND SOILS. Would the project:</b>	<b>Potentially Significant Impact</b>	<b>Less than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
(c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f)	Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**4.7.1 Impact Analysis**

The site is located on a broad terrace plain of the Santa Ana River in the San Bernardino Valley. The San Bernardino Valley in this area is bounded on the north by the San Bernardino Mountains, from which the Santa Ana River emanates.

In the Fall of 2022, 20 test borings ranging in depth from 6.5 to 51.5 feet below ground level were collected by Terracon; the full report is Appendix E. The ground cover is exposed soil and vegetation. Much of the site is relatively flat and has an approximate elevation ranging between 1297 feet and 1291 feet. To the west of the property is I-210 with a slope (ascending from outside the site boundary to the freeway) varying in height from 15 to 20 feet, and an inclination on the order of 2:1 (horizontal: vertical). A drainage channel is also present outside of the western property boundary, and adjacent/parallel to the I-210 toe of slope.

The site is mapped as younger alluvial valley deposits of Holocene age. The Holocene-age alluvium was encountered in the exploratory borings and consists of interbedded sands with silts, silty sand, and gravel lenses. The subsurface soil is loose to dense sand with varying amounts of silt and loose to dense gravel. (Appendix E).

*a) i) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

**Less than Significant Impact.** The Project site is not located within a state-designated Alquist-Priolo Fault Zone. The site is located between two segments of the South Branch of the San Andreas fault each that are more than 4 miles from the site (DOC 2023). All construction activities for the Project would be conducted in accordance with the Uniform Building Code as well as City regulations and ordinances, pertaining to the mitigation of potential geologic and seismic impacts. Implementation of

the Project would have a less than significant impact associated with risk of loss, injury, or death involving a rupture of a known fault.

*ii) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?*

**Less than Significant Impact.** The most significant seismic hazard potentially affecting the Project site is ground shaking from a major earthquake. The Project site is not identified to be located within a State-designated Alquist-Priolo Fault Zone. The type and magnitude of seismic hazards affecting the site are dependent on the distance to fault zones, the intensity, and the magnitude of the seismic event. The site is located more than 4 miles from the nearest fault trace (DOC 2023). Further, all construction activities for the Project would be conducted in accordance with the Uniform Building Code as well as City regulations and ordinances, pertaining to the mitigation of potential geologic and seismic impacts. Implementation of the Project would result in a less than significant risk of loss, injury, or death involving a rupture of a known fault.

*iii) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?*

**Less than Significant Impact.** The Department of Conservation's EQZapp Program indicates the Project site has not been evaluated for liquefaction hazards (DOC 2023). However, the San Bernadino County Policy Map HZ-2 Liquefaction & Landslide Hazards does not show the project site in a liquefaction zone (County 2020). The Terracon 2022 Geotechnical Engineering Report describes the site as being subject to dry sand seismic settlement due to the potential for ground shaking. Based on the calculations, seismically induced settlement of dry sands is estimated to be less than 1.5 inches and differential seismic dry sand settlement is estimated to be less than one inch. Using the data from the geotechnical report, all Project activities would be conducted in accordance with the Uniform Building Code, as well as City regulations and ordinances, pertaining to the mitigation of potential geologic and seismic impacts. Therefore, implementation of the Project would result in a less than significant impact associated with seismic-induced ground failure, including liquefaction.

*iv) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?*

**Less than Significant Impact.** The San Bernadino County Policy Map HZ-2 Liquefaction & Landslide Hazards does not show the project site in a landslide susceptibility zone (County 2020). The elevation profile on Google Earth indicates an average slope of 2%, or indicating the project site is relatively flat also supported by the Geotechnical Engineering Report in Appendix E. Development of the Project would require grading and finished pad construction in accordance with the California Building Code. Therefore, implementation of the Project would result in a less than significant impact associated with landslides.

b) *Would the project result in substantial soil erosion or the loss of topsoil?*

**Less than Significant.** Project construction would be subject to local and State codes and requirements for erosion control and grading. Because construction activities would disturb one or more acres, the Project must adhere to the provisions of the National Pollution Discharge Elimination System (NPDES) Construction General Permit. Construction activities subject to this permit include clearing, grading, and other soil disturbances such as stockpiling and excavating. The NPDES Construction General Permit requires implementation of a Storm Water Pollution Prevention Plan (SWPPP), which would

include temporary project construction features (i.e., best management practices [BMPs]) designed to prevent erosion and protect the quality of stormwater runoff. Sediment-control BMPs may include stabilized construction entrances, straw wattles on earthen embankments, sediment filters on existing inlets, or the equivalent.

In addition, grading activities would be required to conform to the most current version of the California Building Code and the approved Precise Grading Permit required by the City for grading of more than 50 cubic yards. The Project will require grading of approximately 33,800 cubic yards (excavation and fill). The Project must also comply with SCAQMD Rule 402 (Nuisance) and Rule 403 (Fugitive Dust), which would reduce construction erosion impacts. Rule 403 requires control measures to reduce fugitive dust from active operations, storage piles, or disturbed surfaces, with a goal to omit visibility beyond the property line or avoid exceedance of 20-percent opacity. Rule 402 requires dust suppression techniques be implemented to prevent dust and soil erosion from creating a nuisance off site. Compliance with these federal, regional, and local requirements would reduce the potential for both on-site and off-site erosion effects to accepted levels during Project construction. Upon completion of construction activities, ground surfaces would be stabilized by Project structures, paving, and landscaping. Therefore, impacts associated with soil erosion and topsoil loss would be less than significant.

- c) *Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*

**Less than Significant with Mitigation.** As noted in Impact 4.7 a) iii, the Proposed Project site is not located within a liquefaction zone, and the soil is not prone to liquefaction, is relatively flat, and is excessively drained Tujunga loamy sand (County 2020, USDA 2023). Construction activities would be conducted in accordance with the Uniform Building Code and the City's regulations and ordinances pertaining to the mitigation of potential geologic and seismic impacts. Therefore, implementation of the Proposed Project would result in less than significant impacts associated with off-site landslide, lateral spreading, liquefaction, or collapse. However, as noted in the Geotechnical Report, the near surface soils are loose and could be unstable under exterior slabs and pavements (Appendix E) possibly resulting in subsidence under buildings and pavement. Implementation of Mitigation Measure GEO-1 would reduce impacts associated with existing loose near surface soils leading to subsidence to less than significant levels.

**MM GEO-1 Excavate Loose Soils and Replace with Engineered Fill** The subsurface soils within the proposed building pads will be removed to a minimum depth of 4 feet below existing site grades, or 2 feet below bottom of proposed foundations, whichever is greater. Deeper removals may be required if loose soils are still encountered at a depth of 4 feet below ground surface. Grading for the proposed structures should incorporate the limits of the footings plus 3 feet beyond the outside edge of perimeter footings. The bottoms of excavations should be probed to determine if it is firm and unyielding. Localized deeper removals may be needed where soft soils are encountered at the excavation bottom. Compacted engineered fill should then be placed to design finish grade elevations.



Subgrade soils beneath exterior slabs and pavements should be removed to a depth of 1 foot below the proposed pavement section, including bottom of proposed aggregate base materials. Compacted engineered fill should then be placed to design elevations.

Exposed areas receiving fill, once properly cleared and benched where necessary, should be scarified to a minimum depth of 10 inches, moisture conditioned, and compacted per the compaction requirements of the Terracon 2022 Geotechnical Engineering Report in Appendix E.

- d) *Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

**Less than Significant.** Expansive soils possess clay particles that react to moisture changes by shrinking when dry or swelling when wet. These types of soils have the potential to crack building foundations and, in some cases, structurally distress the buildings themselves. Minor to severe damage to overlying structures is possible. However, the Proposed Project is located on Tujunga loamy sand, which has low expansive properties because it is primarily sand without clay characteristics (USDA 2023). Therefore, impacts associated with expansive soils would be less than significant.

- e) *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?*

**No Impact.** An existing sewer line is present on site. The Proposed Project site would rely on existing wastewater infrastructure to accommodate wastewater disposal requirements. Therefore, implementation of the Proposed Project would not result in an impact associated with soils incapable of supporting septic systems.

- f) *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?*

As discussed in Appendix D, on October 22, 2023, Chambers Group received the results of the paleontological records search from the NHMLA. The results show that no fossil localities lie directly within the Project site, however, there are fossil localities documented nearby from the same sedimentary deposit that underlays the Project site, either at the surface or at depth (Bell 2023). The records search covered only the records of the NHMLA. Based on the available information, the paleontological sensitivity could be considered low to moderate in the overall area considering the fossil localities recorded within the study area surrounding the Project site and the existence of similar fossil-bearing geologic units mapped underlying the Project site. These Pleistocene period deposits are composed of surficial alluvial sediments (Qa) that are unconsolidated, undissected, and indurated dissected alluvial fan deposits. Pleistocene alluvial units are considered sensitive for paleontological resources. However, during the survey of the site no evidence of paleontological resources was observed.

While there are no previously documented paleontological resources in the Project site, due to the mapped geologic formations underlying the Project site which are known to bear paleontological resources and the known fossil localities provided in the surrounding study area, there remains potential that new fossils could be exposed during the Project. Implementation of Mitigation Measures PAL-1 and PAL-2 would reduce impacts associated with unearthing unique paleontological resource during ground disturbance would be less than significant.

**MM GEO-2. Qualified Paleontologist.** Prior to issuance of a grading permit, the Applicant shall be required to obtain the services of a Qualified Project Paleontologist to remain on call for the duration of the proposed ground-disturbing construction activity. Upon approval or request by the City, a paleontological mitigation plan (PMP) outlining procedures for paleontological data recovery shall be prepared for the Project and submitted to the City for review and approval. The development and implementation of the PMP shall include consultations with the City’s Engineering Geologist as well as a requirement that the curation of all specimens recovered under any scenario shall be through an appropriate repository agreed upon by the City. If the City accepts ownership, the curation location may be revised. The PMP shall include developing a multilevel ranking system, or Potential Fossil Yield Classification (PFYC), as a tool to demonstrate the potential yield of fossils within a given stratigraphic unit. The PMP shall outline the monitoring and salvage protocols to address paleontological resources encountered during Project-related ground-disturbing activities, as well as the appropriate recording, collection, and processing protocols to appropriately address any resources discovered.

**MM-GEO-3 Paleontological Report.** At the completion of all ground-disturbing activities, the Project Paleontologist shall prepare a final paleontological mitigation report summarizing all monitoring efforts and observations, as performed in line with the PMP, and all paleontological resources encountered, if any, as well as providing follow-up reports of any specific discovery, if necessary

**4.8 GREENHOUSE GAS EMISSIONS**

8.	GREENHOUSE GAS EMISSIONS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**4.8.1 Impact Analysis**

Kimley-Horn prepared a GHG Emissions Assessment for the Proposed Project on May 2023. The GHG Emissions Assessment was prepared to evaluate the potential construction and operational emissions associated with the Proposed Project and determine the level of impact it would have on the environment. The results of GHG Emissions Assessment indicate that the Proposed Project would have a less than significant impact with regard to greenhouse gas emissions. The complete report can be found in Appendix F.

- a) *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

**Less than Significant Impact.**

Short-Term Construction GHG Emissions

Project construction activities would generate direct CO<sub>2</sub>, N<sub>2</sub>O, and CH<sub>4</sub> emissions from construction equipment, transport of materials, and construction workers commuting to and from the Project site. Total GHG emissions generated during all construction phases were combined and are presented in the table below.

**Table 8: Construction-Related Greenhouse Gas Emissions**

Category	MTCO <sub>2e</sub>
2023 Construction	292
2024 Construction	179
Total Construction	471
30-Year Amortized Construction	15.70
Source: CalEEMod version 2022.1 Refer to <u>Appendix A</u> for model outputs.	

As indicated in Table 8, the Project would result in the generation of approximately 471 MTCO<sub>2e</sub> over the course of construction. Construction GHG emissions are typically summed and amortized over a 30-year period, then added to the operational emissions. The amortized Project construction emissions would be 15.70 MTCO<sub>2e</sub> per year. Once construction is complete, construction related GHG emissions would cease.

Long-Term Operational Greenhouse Gas Emissions

Operational or long-term emissions occur over the life of the Project. GHG emissions would result from direct emissions such as Project generated vehicular traffic, on-site combustion of natural gas, and operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power, the energy required to convey water to, and wastewater from the Project, the emissions associated with solid waste generated from the Project, and any fugitive refrigerants from air conditioning or refrigerators.

Total GHG emissions associated with the Project are summarized in Table 9. As shown in Table 9, the Project would generate approximately 2,823.70 MTCO<sub>2e</sub> annually from both construction and operations activities which is below the SCAQMD’s 3,000 MTCO<sub>2</sub>/year GHG threshold. Therefore, the proposed Project would not generate significant GHG emissions, and the impacts would be less than significant.

**Table 9: Project Greenhouse Gas Emissions**

Emissions Source	MTCO <sub>2</sub> e per Year
Construction Amortized Over 30 Years	15.70
Area Source	1
Energy	242
Mobile	1,010
Stationary Source – Generator <sup>1</sup>	20
Waste	54
Water and Wastewater	18
Refrigeration	1,463
<b>Total</b>	<b>2,823.70</b>
<i>SCAQMD Threshold</i>	<i>3,000</i>
<b>Exceeds Threshold?</b>	<b>No</b>
Notes:	
1. One emergency backup generator has been assumed for the proposed Project.	
Source: CalEEMod version 2022.1. Refer to <u>Appendix A</u> for model outputs.	

- b) *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

**Less than Significant Impact.** On September 3, 2020, SCAG’s Regional Council adopted Connect SoCal (2020 - 2045 Regional Transportation Plan/Sustainable Communities Strategy [2020 RTP/SCS]). The RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals.

The 2022 Scoping Plan sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. The transportation, electricity, and industrial sectors are the largest GHG contributors in the State. The 2022 Scoping Plan plans to achieve the AB 1279 targets primarily through zero-emission transportation (e.g., electrifying cars, buses, trains, and trucks). Additional GHG reductions are achieved through decarbonizing the electricity and industrial sectors.

Several of the State’s plans and policies would contribute to a reduction in mobile source emissions from the Project. These include the CARB’s Advanced Clean Truck Regulation, Executive Order N-79-20, CARB’s Mobile Source Strategy, CARB’s Sustainable Freight Action Plan, and CARB’s Emissions Reduction Plan for Ports and Goods Movement. The San Bernardino County Regional GHG Reduction Plan (County GHG Reduction Plan) presents greenhouse gas inventories, assesses the effectiveness of California initiatives to reduce GHG emissions, and identifies local GHG reduction strategies that were selected for 25 Partnership jurisdictions to reduce local GHG emissions. The County GHG Reduction Plan presents the collective results of all local efforts to reduce GHG emissions consistent with

statewide GHG targets expressed in Senate Bill (SB) 32, the “Global Warming Solutions Act of 2006,” and SB 375. The County GHG Reduction Plan identifies state measures applicable to every Partnership jurisdiction, as well as local measures selected by each jurisdiction, that could reduce future GHG emissions within jurisdictional boundaries.

The City approved and adopted the City of Redlands CAP on December 5, 2017. The proposed Project would be consistent with the transportation and water utility goals of the CAP by providing EV charging stations for electric vehicles and complying with the City’s Water Efficient Landscape requirements. The proposed Project would also be consistent with the CAP’s energy efficiency goals by complying with the latest California Building Code (Title 24), including the latest CALGreen Code standards. Project construction would also comply with current local and State standards and CAP goals to increase diversion and reduction of waste by diverting construction waste from landfills to recycling. As such, the proposed project would be consistent with the applicable GHG reduction goals within the Redlands CAP.

As shown in Table 3, approximately 44 percent of the Project’s GHG emissions are from energy and mobile sources, which would be further reduced by the 2022 Scoping Plan goals described above (including achieving 100 percent clean electricity by 2045 [SB 100], achieving 100 percent zero emission vehicle sales in 2035 [Advanced Clean Cars II], and implementing the Advanced Clean Fleets regulation [ZEV buses and trucks]). It should be noted that the City has no control over vehicle emissions. However, these emissions would decline in the future due to Statewide measures discussed above (including the reduction in fuels’ carbon content, CARB’s Advanced Clean Car Program, CARB’s Mobile Source Strategy, fuel efficiency standards, etc.), as well as cleaner technology and fleet turnover. SCAG’s 2020 RTP/SCS is also expected to help California reach its GHG reduction goals, with reductions in per capita transportation emissions of 19 percent by 2035. The Project would also comply with the goals of the Redlands CAP and would not inhibit its implementation or progress.

In conclusion, the Project does not conflict with the applicable plans that are discussed above and therefore, with respect to this particular threshold, the Project does not have a significant impact.

**4.9 HAZARDS AND HAZARDOUS MATERIALS**

9.	<b>HAZARDS AND HAZARDOUS MATERIALS. Would the project:</b>	<b>Potentially Significant Impact</b>	<b>Less than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
(a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

(d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**4.9.1      Impact Analysis**

a) *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

**Less Than Significant Impact.** During construction of the Project, hazardous and potentially hazardous materials typically associated with construction activities would be routinely transported to/from and used on the Project site. These hazardous materials could include gasoline, diesel fuel, lubricants, and other products used to operate and maintain construction equipment. Construction materials including paints, adhesives, cleaning fluids, and solvents. Handling of these hazardous materials would be temporary in nature and limited to quantities and concentrations consistent with a commercial use of this size. BMPs such as proper labeling of chemicals, storage in approved containers, preparation of an accidental release plan, and compliance with hazardous materials handling protocols would be prepared and implemented to ensure safe storage, handling, transport, use and disposal of all hazardous materials during the construction phase of the Project, in compliance with all applicable laws, ordinances, rules, regulations, and orders. The Contractor would ensure hazardous waste generated is properly disposed. The transport, use, and handling of these materials would be a temporary activity coinciding with short-term Project construction activities.

Operation of the proposed Project would consist of a sales and administrative building, service building, private carwash, associated access drives, landscaped areas, presentation area, staging area, sales display area, and a customer and employee parking lot. Typical daily operations include deliveries of vehicles, parts and supplies to the site, vehicle sales and test drives, preparation of vehicles for sales, and vehicle service work which is to be performed inside fully conditioned buildings equipped with rollup doors. Only minor vehicle servicing will occur, including routine maintenance, oil changes, tire rotations diagnostic and mileage services. No major mechanical work, body work, or painting will occur within the service building.

The Project would include small quantities of hazardous substances as part of daily operations. The servicing operations would require the storage, transport, use and disposal of cleaning solvents, diesel, gasoline, oil, and other automotive fluids. Gasoline would be transported to the site by fuel trucks, which is a routine, permitted use. Given the quantities of potentially hazardous materials and

the characteristics of use (e.g., routine maintenance and cleaning), the Project would not be a potential risk to human health or the environment. Fuel transportation would be subject to federal shipment documentation and reporting requirements. The amount of hazardous materials stored and used would be limited and would be required to comply with applicable local, state, and federal regulations.

Operation of aboveground petroleum storage capacities of 1,320 gallons or more, which include aboveground storage containers or tanks with petroleum storage capacities of 55 gallons or greater, are subject to the Aboveground Petroleum Storage Act (APSA). APSA also regulates tank facilities with less than 1,320 gallons of petroleum if they have one or more stationary tanks in an underground area (TIUGA) with a shell capacity of 55 gallons or more of petroleum, and, in this case, only the TIUGAs are subject to APSA (CALFIRE 2023). The San Bernardino County Fire Protection District is the designated Certified Unified Program Agency (CUPA) responsible for the regulatory inspections of all tank facilities subject to the APSA in the County. In accordance with the APSA program, the Project would prepare and implement a Spill Prevention, Control, and Countermeasure (SPCC) Plan in order to prevent discharge of petroleum and to allow for the preparedness and proper response of petroleum discharges. The SPCC Plan is to be kept on-site for CUPA inspections. The Project would also be required to submit a Hazardous Material Business Plan (HMBP) to the CUPA that provides the on-site use and storage of fuels and hazardous materials in quantities equal or greater than:

- 55 gallons of a liquid,
- 500 pounds of a solid, or
- 200 cubic feet of compressed gas, or
- Extremely hazardous substances above the threshold planning quantity
- Facilities in County must also report any amount of hazardous waste via California Environmental Reporting System (CERS). (CUPA 2023)

The HMBP also provides emergency response personnel with adequate information to help prepare and respond to incidents at regulated facilities.

In summary, construction and operations of the proposed Project would comply with applicable federal, state, and local laws and regulation, and would require permits and the development of a SPCC Plan and a HMBP, resulting in a less than significant impact related to routine transport, use, or disposal of hazardous material.

- b) *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

**Less Than Significant Impact.** The Phase 1 Environmental Site Assessment (ESA) dated November 2022 for the Project site (Appendix G) did not identify any past or present Recognized Environmental Conditions (RECs) in connections with the site. As discussed in a) above, handling of hazardous materials during Project construction would be temporary and limited to quantities and concentrations consistent with construction of this size and type of commercial use facility. BMPs such as proper labeling of chemicals, storage in approved containers, preparation of an accidental release plan, and compliance with hazardous materials handling protocols would be implemented to minimize hazards to the public or the environment.



During Project operations, handling of small quantities of hazardous substances such as cleaning solvents, diesel, gasoline, oil, and other automotive fluids would occur as part of daily operations. Fuel transportation would be subject to federal shipment documentation and reporting requirements. The Project will comply with County CUPA enforced regulations and will obtain the required permits for operation of the aboveground fuel storage tank.

The Project would be required to submit a HMBP to the County CUPA that details the on-site use and storage of fuels and hazardous substances to prevent harm to public health, safety, and the environment involving the release of hazardous materials. Chemicals used in the carwash would be stored in closed containers and used in small amounts. Wastewater from the carwash would go into an oil water separator, the water would be reused in the carwash and the separated chemicals and oil would be taken off-site to be treated by a certified waste vendor. Compliance with applicable state, local, and federal laws and preparation of a HMBP would safeguard operations involving hazardous materials would not result in the release of such materials into the environment. The Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and therefore, impacts are less than significant.

- c) *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

**Less Than Significant Impact.** There are no schools within a ¼ mile of the proposed Project. The nearest schools include the Redlands Adventist Academy located 0.9 miles to the South, and Orangewood High School and Redlands eAcademy (located on the Orangewood High School campus) approximately 0.4 mile to the Southeast. Both locations are on the other side of I-10 from the Project site. As discussed in Section 4.8.1a and 4.8.1b, compliance with applicable state, local, and federal laws and preparation of a HMBP would safeguard construction and operational activities involving hazardous materials from resulting in a significant hazard to the public or the environment. Therefore, impacts associated with emitting hazardous emissions or handling hazardous materials within a ¼ mile of a school would be less than significant.

- d) *Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

**Less Than Significant Impact with Mitigation.** The Phase 1 ESA dated November 2022 for the Project site (Appendix G) did not identify any past or present RECs in connections with the site. The Proposed Project site is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (SWRCB 2023; Department of Toxic Substances Control [DTSC] 2023). However as identified in the ESA and the State Hazardous Waste databases, the previous Teledyne Battery Products facility at 840 Brockton was a LUST Cleanup Site but the case has been closed (DTSC 2023 and SWRB 2023). The site is approximately 602 feet to the northeast of the project area (SWRB 2023). According to the ESA (Appendix G), a 1994 ESA indicating an unauthorized release of heating oil impacting soil in 1987 was reported for the facility, and the responsible party installed borings and/or monitoring wells to further define the extent of contamination. It was concluded due to the distances from the Project site and impacts to soils only that Teledyne Battery is not a REC to the project site. However, in 1996 an additional ESA documented in Appendix G identified Teledyne, located approximately 740 feet east of the site and City of Redlands Well Field, in the regulatory database as

off-site issues. The City of Redlands Well Field was found to be associated with the plume that was identified on the Teledyne property. The 1996 ESA noted that the City of Redlands was utilizing a pump and treat method to clean up the groundwater. DTSC noted that the groundwater was not adequately characterized to determine if a release occurred at Teledyne. The 2022 ESA concluded due to the distance from the site and the depth to groundwater (230 feet), that the City of Redlands Well Field and the Teledyne site were not RECs to the Project site. However, there is a possibility during ground disturbance on the northeast portion of the site that unanticipated contamination could be exposed, which has the potential to impact the public or the environment. Therefore, impacts associated with hazardous materials site resulting in creation of a significant hazard to the public or the environment would be less than significant with implementation of MM HAZ-1 and HAZ-2.

**MM HAZ-1 Unanticipated Contamination Discovery Plan.** An Unanticipated Contamination Discovery Plan (UCDP) will be developed prior to ground disturbing activities on the project site. Contractors will be trained on the requirements of the UCDP during pre-construction environmental training. The UCDP is intended to provide guidance to ensure worker and public safety as well as prevent the spread of further contamination if contaminated soils are encountered during construction of the Project. The UCDP will provide contact information for laboratories that will analyze the samples and solid waste facilities that will accept the contaminated soils. It will identify the procedures for:

- Notification and documentation requirements;
- Identification of the characteristics of the contaminated soil (e.g., sample methods, vertical and horizontal extent of contamination and chemicals of concern);
- Determining baseline at which work can be reinitiated in the area;
- handling and/or disposal requirements for any contaminated media unearthed.
- The UCDP shall be effective during all ground disturbing activities of the Project.

**MM HAZ-2 Initial Response to Unanticipated Soil Contamination.** During excavation, indicators of possible contamination include, but are not limited to:

- Stained or discolored earth, as contrasted to adjoining soil;
- Fill material containing debris unearthed during trenching or grading;
- Household trash covered by earth or other material that appears to be interspersed with industrial debris;
- Gasoline smells or other hydrocarbon odors that emanate when the earth is disturbed; or
- Oily residue intermixed with earth.

Immediately following discovery of potentially hazardous waste or contaminants, the Contractor will:

- Cease work in the vicinity of suspected contamination;
- Cordon off or otherwise restrict access to the suspected area to protect workers and the public;
- Notify the City and Project authorities; and
- Implement the UCDP.

- e) *For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

**Less Than Significant Impact.** The Redlands Municipal Airport runway is approximately 2.8 miles to the Northeast of the project site (Google 2023). The Project area is not within the Redlands Airport Influence Area on the Redlands Municipal Airport Compatibility Map, with the western boundary of Orange Street just North of East Lugonia Avenue (City 2002). The western boundary is approximately 0.75 miles northeast of the project site. The San Bernardino International Airport runway is approximately 2.66 miles Northwest of the Project site on the other side of the I-210 (Google 2023). Figure 3.7-2 Airport Hazards in the Redlands General Plan 2035 EIR displays the Project area outside of the San Bernardino International Airport Influence Area Boundary (City 2018). Therefore, the project would not create a significant hazard or excessive noise for people working in the Project Area. The impact is less than significant.

- f) *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

**Less Than Significant Impact.** The Project area includes two driveways for access to the site from New York Street. The applicable emergency response or emergency evacuation plans for the Project area include the San Bernardino County Emergency Operations Plan (EOP) and the Redlands Local Hazard Mitigation Plan (LHMP). The EOP is administered and coordinated by the San Bernardino County Fire Department Office of Emergency Services. The concepts presented in EOP are comprised of mitigation programs to reduce the vulnerabilities to disasters and preparedness activities to ensure the capabilities and resources are available for an effective response. To assist communities in recovering from a disaster, the plan outlines programs that promote a return to regularity (County 2018). The purpose of the LHMP is to outline a mitigation strategy to help reduce and/or eliminate impacts from hazards within the City of Redlands (City 2021a). Compliance of all San Bernardino County Fire Protection District requirements, through the CUPA permitting process, would reduce the risk that the Project would impair an adopted emergency response plan or emergency evacuation plan, and impacts are less than significant.

- g) *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

**No Impact.** The project site will be primarily covered with asphalt, cement, and buildings as 11.92 acres will be impervious areas and 5.4 acres would be landscaped/grassy areas. It would not exacerbate wildfire risk. The Project site is located outside of the State and locally classified very high fire hazard severity zone. Much of the area surrounding the proposed Project is built out and the undeveloped area has minimal vegetation. Therefore, the project would not exacerbate wildfire risks resulting in no impact.

**4.10 HYDROLOGY AND WATER QUALITY**

10.	HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
	i) Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flood on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**4.10.1 Impact Analysis**

a) *Would the project violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or ground water quality?*

**Less than Significant Impact.** Construction of the Project would be subject to City, County, and State requirements for erosion control and grading. Because construction activities would disturb one or more acres and more than 50 cubic yards of earth, the Applicant would be required to adhere to the provisions of the NPDES Construction General Permit and obtain a Grading Permit from the City. Construction activities subject to these permits include clearing, grading, and soil disturbance through stockpiling and grading. The NPDES Construction General Permit requires implementation of a SWPPP, which would include BMPs designed to prevent erosion and sedimentation in stormwater runoff. These construction BMPs would help retain stormwater and any constituents, pollutants, and sediment on the Project site, which would assist in the prevention of water quality impacts to downstream receiving waters during construction.

During operations, the Project's Water Quality Management Plan (WQMP) in Appendix G, describes the site drainage being intercepted by inlets with full trash capture filter inserts that will filter out trash and debris before runoff is routed to the detention basin system. The on-site catch basins shall be inspected monthly during the rainy season (October-May) and before and after each storm to preserve proper operation. The whole storm drain system will be inspected prior to the rainy season and after every rain event greater than 0.5 inches. Appendix H also identifies BMPs that protect downstream water quality including design of the trash enclosures to divert all storm flows around the enclosure and shall be checked on a weekly basis to ensure that no leaks are present, and that trash does not accumulate on the enclosure floor. All dumpsters will be inspected to ensure that they remain covered and leakproof. The Applicant shall ensure that the site is inspected daily for stray trash and that it is collected and disposed of correctly. No outdoor vehicle processing is proposed, and vehicle wash areas will be operated in compliance with the San Bernardino County Stormwater Program and California Stormwater Best Management Practice Handbook New Development and Redevelopment BMP SD-33 Vehicle Washing Areas. The vehicle wash is indoors, and wash water will be contained and recycled. Also, landscape areas used for water quality swales or infiltration areas shall have appropriate plants for saturated soils, drought tolerance and erosion control qualities. The parking lots will be swept weekly between October and May and quarterly outside of the rainy season.

As described in the WQMP, spill kits will be accessible at vehicle maintenance and fueling area. Employees will be trained in proper spill response. The project site will include Spill Contingency Plans and an Emergency Contingency Plan to provide spill procedures in the inadvertent spill or leak associated with used vehicle transport and reconditioning. Compliance with City, County, and State requirements and implementation of the project WQMP will prevent the project from violating water quality standards or waste discharge requirements or degradation of surface or groundwater quality, resulting in a less than significant impact.

- b) *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

**Less than Significant Impact.** The project would cover 11.92 acres of an 18.5 acre site with impervious pavement and buildings. However, the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge resulting in impeding groundwater management of the basin. There are no groundwater wells present on the site. According to the Geotechnical Engineering Report (Appendix F) dated September 2022, twenty borings were collected at depths ranging from 6.5 to 51.5 feet below ground surface (bgs) and ground water was not encountered. The Phase 1 Environmental Site Assessment (Appendix G), indicates based on wells in the area of the project site, within 740 and 330 feet respectively, groundwater was anticipated to be approximately 230 bgs in the project vicinity. Therefore, the site in its current condition is not significantly recharging the groundwater table. However, the site stormwater management will include an infiltration basin that will allow percolation of stormwater into the underlying groundwater basin.

The City of Redlands provides water to the City and its Sphere of Influence. The Redlands 2020 Urban Water Management Plan (UWMP) that is Part 2 Chapter 4 of the 2020 Upper Santa Ana River Watershed Integrated Regional UWMP, indicates Redlands obtain water from surface water from Mill Creek Watershed and Santa Ana River Watershed, groundwater from the Bunker Hill Subbasin and Yucaipa Subbasin, recycled water, and water imported from the State Water Project (SWP) as needed.

During wet years, the City contributes to regional efforts to recharge the Bunker Hill Basin so there is availability in dry years when other sources may be limited. (City 2021b)

It has been estimated, by the Applicant, that the project would use 33,630 gallons of freshwater per month, which is equivalent to 1.24 acre-feet per year. Based on the UWMP, the long-term analysis of the groundwater table during average years and multi-dry years indicates that the supply will still be capable of meeting the City's demand through 2045. The groundwater portion is projected to be 17,484 acre feet, Bunker Hill and Yucaipa combined (IRUWMP 2020). In addition, the project's primary use of water is for washing, so the water is not required to be 100 % potable; this allows flexibility to the City of the water sources that are provided to the project site. Therefore, the project would have a less than significant impact on groundwater supplies, recharge, and would not impede groundwater management of the basin.

c) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*

i) *result in substantial erosion or siltation on- or off-site;*

**Less Than Significant Impact.** A Hydrology and Hydraulics Report (Drainage Report) was completed for the Project dated May 2023 and is included in Appendix I. The purpose of this report is to provide information about the design of the Storm Water Management System for the project and to determine the impact the proposed development has on the local existing drainage system and to mitigate post development peak flows beyond the pre-development peak flows.

There are no streams or rivers on the site, and the soil is sandy. The site is relatively flat, and the regional topography is sloped toward the northwest. The existing drainage of the site is from the southeast to the northwest, towards a Caltrans Channel to the west of the project boundary and ultimately discharging into the Santa Ana River Reach 5. Runoff from the existing site does not include off-site drainage. Once developed, the project site will have one main drainage area that will continue to contribute runoff to the western Caltrans Channel. However, the drainage will come from an infiltration basin that will infiltrate stormwater and only discharge additional runoff through an outlet pipe directly into the Caltrans Channel. The conclusions of the Drainage Report (Appendix I) specify that the development would discharge less stormwater than existing conditions due to the percolation through the drainage basin. Therefore, the project would have a less than significant impact on existing drainage patterns and would not result in substantial erosion or siltation on or off site.

ii) *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;*

iii) *create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources or polluted runoff; or*

ii and iii) **Less Than Significant Impact.** As described in i) above, the drainage of the site would continue to use the existing drainage pattern of discharging storm runoff into the Caltrans Channel to the west of the site boundary. This channel eventually discharges into the Santa Ana River Reach 5. The Drainage Report (Appendix I) indicates that the infiltration basin has been designed to retain a 100-year storm up to a 24-hour event. The 100-year storm precipitation was used in the volume calculations for the storm water management system design. The infiltration/detention tank



provides 201,640 cubic feet per second (cfs) of storage. The peak flows discharge through an 18" orifice at a max flow of 9.36 cfs. The conclusions of the Drainage Report specify that the development would discharge less stormwater than existing conditions.

The Drainage Report also describes the Project Site as having a hydrologic soil group classification of A. Group A soils that typically has low runoff potential with high infiltration rates when thoroughly wetted and consist primarily of deep, well-drained sands or gravels. This is further supported by the soil type described in the Soil Survey (USDA 2023) that indicates the soil characteristics of Tujunga loamy sand is excessively drained and the underlying soil of the infiltration basin and the Caltrans Channel.

Throughout construction, the conditions of the NPDES Construction General Permit require implementation of a SWPPP, which would include BMPs designed to prevent erosion and sedimentation in stormwater runoff. The WQMP indicates that during operations, the proposed site drainage will be intercepted by proposed inlets with full trash capture filter inserts and will be routed to the detention basin system reducing debris in stormwater discharge. Multiple BMPs are identified in a) above that address the prevention of polluted runoff including diversion of stormwater flows from trash enclosure, weekly street sweeping during raining season, and contingency planning and employee training to prevent spills from getting into the stormwater drains. Therefore, the project construction and operations would have less than significant impact on the drainage pattern, creation of on or off-site flooding, or providing additional sources of polluted runoff.

*iv) impede or redirect flood flows?*

**Less Than Significant Impact.** Although the project development would increase the impervious surfaces on the site, a new on-site storm drain system, designed for the 100-year one-hour storm, will be installed to collect surface runoff at designated storm inlet locations across the site and convey flows downstream. Each inlet will be sized to limit ponding depths across the pavement to less than the 6-inch curb height. The drainage of the site would continue to use the existing drainage pattern of discharging storm runoff into the Caltrans Channel to the west of the site boundary. The Drainage Report (Appendix I) indicates that the infiltration basin has been designed to retain a 100-year storm up to a 24-hour event. The conclusions of the Drainage Report specify that the development would discharge less stormwater than existing conditions due to percolation into the project infiltration basin. Therefore, the impact to existing drainage patterns and impeding or directing flood flows would be less than significant.

*d) Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*

**No Impact.** The site is over 55 miles east of the Pacific Ocean and there are no large bodies of water near the site. The Federal Emergency Management Agency (FEMA) Flood Hazard Firmette for the Project site included in the Drainage Report (Appendix I) indicates it is in Zone X Area of Minimal Flood Hazard. FEMA defines Zone X as being outside a Special Flood Hazard Area and higher elevation than a 0.2 percent annual chance flood (500-year flood) (FEMA 2020). As a result, there is no impact from the project having a high risk of inundation due to being in flood, tsunami, or seiche zones.

*e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*



**Less Than Significant Impact.** The City of Redlands is part of the Santa Ana River RWQCB. The Santa Ana River Basin Water Quality Control Plan (Basin Plan) contains the RWQCB’s policies for managing the region’s water quality. The Basin Plan includes an implementation plan describing the actions by the RWQCB and others that are necessary to achieve and maintain the water quality standards. The City is responsible for monitoring TDS and nitrogen in groundwater every three years starting in 2005 (RWQCB 2020). The City, as part of the Basin Monitoring Program Task Force, must complete a Recomputation of Ambient Water Quality every three years and prepare a Water Quality Report for the Santa Ana River annually (RWQCB 2020). As a result, the City has an active role in collecting data for the management of water quality in the region.

The Project site is in the Upper Santa Ana Valley-San Bernardino Groundwater Basin. According to the Sustainable Groundwater Management Act 2019 (SGMA) Basin Prioritization Dashboard, the groundwater basin is a Very Low Priority (2019 DWR). Therefore, the California Department of Water Resources does not require the formation of a Groundwater Sustainability Agency (GSA) or a Groundwater Sustainability Plan for the Basin (2020 DWR), resulting in no conflict of a sustainable groundwater management plan by the project.

As discussed in a), the project would be required to comply with City, County, and State requirements regarding protection of water quality, and thus would not conflict with a water quality control plan. In addition, the project would not deplete groundwater supplies or interfere with groundwater recharge as discussed in b). Implementing the WQMP and the Drainage Plan (appendices H and I) during construction and operations will result in compliance with all applicable regulations, thus the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, the impact is less than significant.

**4.11 LAND USE AND PLANNING**

11.	LAND USE/PLANNING Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**4.11.1 Impact Analysis**

a) *Would the project physically divide an established community?*

**No Impact.** The Project site is located on undeveloped land within the commercial district of the Specific Plan. Commercial properties are located to the north, east, and south along with the I-210 to the west. There are single-family residences located to the east of the Project site. Land use features that physically divide an established community involve construction of new roads and/or bridges. Division can also include new zoning and land use designations.

The Project site is zoned for commercial uses and does not contain any parcels designated for residential uses. There are no residential communities adjacent to the Project site. The Proposed Project would not physically divide an established community as there are no residential communities within or adjacent to the Project site. Additionally, the Project does not propose construction of new roadways or bridges that would divide existing communities in the area, therefore, no impact would occur.

- b) *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

**Less Than Significant Impact.** The Project site is zoned as commercial. Land uses within the commercial district permit major departments stores and retail sales of automobiles, automobile rentals, and car washes. Repair and serving facilities are allowed within the commercial district of the Specific Plan. The existing language of the Specific Plan permits used automobile sales as an accessory to the sale of new automobiles. The Proposed Project proposes an amendment to the Specific Plan to permit the construction of a pre-owned automobile sales, refurbishing, and reconditioning facility with outdoor vehicle storage with a Conditional Use Permit.

The Proposed Project would not result in significant environmental impact due to a conflict with any land use plan, policy, or regulation. While the Proposed Project is amending the permitted use language of the Specific Plan, the change in language is not proposing incompatible uses. The Proposed Project would be consistent in operating a commercial facility. The Proposed Project would amend the Specific Plan to permit the sale of used vehicles as its primary operation and not as an accessory to the sales of new automobiles. Automobile sales is a consistent use of the parcel and other automobile related businesses are currently operating adjacent to the Project site. Therefore, impacts would be less than significant.

**4.12 MINERAL RESOURCES**

12.	MINERAL RESOURCES Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**4.12.1 Impact Analysis**

- a) *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

**No Impact.** According to the California Division of Mines and Geology, no significant mineral deposits are known to exist in the City. In addition, Redlands is required by the Surface Mining and Reclamation Act of 1975 (SMARA) to adopt policies recognizing the importance of the identified mineral resources,

clarifying the intent that this information is to be used when making land use decisions in areas designated to be of statewide or regional significance, and emphasizing the conservation and development of identified mineral deposits.

The Proposed Project site is not identified as being within a significant mineral resource zone in the DOC’s Mineral Land Classification Map; nor would the Proposed Project involve any mining activities (DOC 1986). In addition, the Proposed Project will not include any oil exploration or drilling. No impact would occur.

*b) Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?*

**No Impact.** The Project proposes to develop on land that has not been designated to contain a locally significant resource for minerals. As noted above, no significant mineral deposits are known to exist in the City (City 2018, DOC 1986). In addition, no mineral resource extraction would occur as part of the Proposed Project. No impact would occur.

**4.13 NOISE**

13.	<b>NOISE</b> Would the project result in:	<b>Potentially Significant Impact</b>	<b>Less than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
(a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**4.13.1 Impact Analysis**

Kimley-Horn prepared an Acoustical Assessment for the Proposed Project on May 2023. The Acoustical Assessment was prepared to evaluate the potential construction and operational noise and vibration levels associated with the Proposed Project and determine the level of impact it would have on the environment. The results of Acoustical Assessment indicate that the Proposed Project would have a less than significant impact with regard to noise. The complete report can be found in Appendix J.

*a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

**Less than Significant Impact.**

## Construction

Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., land clearing, grading, excavation, paving). Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels. During construction, exterior noise levels could affect the residential uses near the construction site. However, it is acknowledged that construction activities would occur throughout the project site and would not be concentrated at a single point near sensitive receptors.

Construction activities would include site preparation, grading, infrastructure improvements, building construction, paving, and architectural coating. Such activities could require dozers and tractors during site preparation; excavators, graders, dozers, tractors, and scrapers during grading; tractors, pavers, and rollers during infrastructure improvements; cranes, generators, tractors, and welders during building construction; pavers, rollers, and a pavement scarifier during paving; and air compressors during architectural coating. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation, followed by 3 to 4 minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts).

Sensitive uses in the Project site vicinity include existing residential uses to the east and northeast that could be exposed to elevated noise levels during Project construction. The noise levels calculated in Table 10 show the exterior construction noise at the nearest sensitive receptor and nearest non-sensitive commercial receptor conservatively, without accounting for attenuation from existing physical barriers and improvements in the technology of construction equipment, which today generate less noise. Construction equipment was assumed to operate simultaneously to represent a worst-case noise scenario, as construction activities would routinely be spread throughout the construction site and would operate at different intervals.

**Table 10: Project Construction Noise Levels**

Construction Phase	Receptor Location		Worst Case Modeled Exterior Noise Level (dBA L <sub>eq</sub> )	Noise Threshold (dBA L <sub>eq</sub> ) <sup>2</sup>	Exceeded?
	Land Use	Distance (feet) <sup>1</sup>			
Site Preparation	Residential (East of the Project site)	1,100	60.8	80	No
Grading			61.4		No
Building Construction			62.5		No
Paving			59.7		No
Architectural Coating			46.9		No
Site Preparation	Commercial (North of the Project site)	400	69.6	85	No
Grading			70.2		No
Building Construction			71.3		No
Paving			68.5		No
Architectural Coating			55.7		No

Note:  
 1. Distance measured from the center of the Project site to the receptor's nearest property line.  
 2. Threshold from Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, Table 7-3, 2018.  
 Source: Federal Highway Administration, *Roadway Construction Noise Model*, 2006. Refer to [Appendix A](#) for noise modeling results.

As shown in Table 10, construction noise levels would not exceed the applicable Federal Transit Administration (FTA) construction thresholds. The highest exterior noise level at the nearest residential receptors would occur during the building construction stage, and would be 62.5 dBA, which is below the FTA's 80 dBA threshold for residential uses. At the adjacent commercial use (north of the Project site located approximately 400 feet from the center of the construction area), maximum construction noise levels of 71.3 dBA would not exceed the FTA's threshold of 85 dBA for commercial uses.

Construction activities may also cause increased noise along site access routes due to movement of equipment and workers. Compliance with the Redlands Municipal Code (RMC) would minimize impacts from construction noise, as construction would be limited to daytime hours on weekdays and Saturdays.

As discussed above, construction noise levels from the Project would not exceed the FTA's construction noise thresholds and would be required to comply with the RMC standards and allowable construction timeframe, and therefore would result in a less than significant noise impact.

## Operation

Implementation of the proposed Project would create new sources of noise in the project vicinity. The major noise sources associated with the project including the followings:

- Mechanical equipment (i.e., trash compactors, air conditioners, etc.);
- Parking lot noise (i.e., car door slamming, car radios, engine start-up, and car pass-by); and
- Off-Site Traffic Noise.
- Truck Delivery Noise
- Car Wash Operations Noise

The results of the noise models show that the operations listed above would not exceed allowable noise levels reaching receptor from mechanical equipment, parking lot activities, and off-traffic noise. Operations from car wash operations, truck delivery noise, and back-up alarms shall comply with the City's noise standards. Impacts would be less than significant.

- b) *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

**Less than Significant Impact.** Increases in ground-borne vibration levels attributable to the proposed Project would be primarily associated with short-term construction-related activities. Construction on the Project site would have the potential to result in varying degrees of temporary ground-borne vibration, depending on the specific construction equipment used and the operations involved. The nearest structure to the Project site is the Home Depot building, located approximately 70 feet to the north of the Project boundary line. The nearest residential structure is located approximately 657 feet east of the Project boundary line. Ground-borne vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. Vibration velocities from typical heavy construction equipment operations that could be used during Project construction range from 0.0006 to 0.0190 in/sec PPV at 70 feet from the source of activity (the distance from active construction zone to the nearest structure to the north), which is below the FTA's 0.20 PPV threshold for structural damage and Caltrans 0.4 in/sec PPV threshold for annoyance. The closest residential uses are approximately 657 feet east of the Project site; at this distance, vibration velocities from typical heavy construction equipment would be far lower than those calculated from the FTA's Transit Noise and Vibration Impact Assessment Manual.

Once operational, the Project would not be a significant source of ground-borne vibration. It is also acknowledged that construction activities would occur throughout the project site and would not be concentrated at the point closest to the nearest structure. Therefore, vibration impacts associated with the Project construction would be less than significant.

- c) *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public us airport, would the project expose people residing or working in the project area to excessive noise levels?*

**Less Than Significant Impact.** The San Bernardino International Airport runway is approximately 2.66 miles Northwest of the Project site on the other side of I-210 (Google 2023). Figure 3.7-2 Airport Hazards in the Redlands General Plan 2035 EIR displays the Project area outside of the San Bernardino International Airport Influence Area Boundary (City 2018). The Redlands Municipal Airport runway is approximately 2.8 miles to the Northeast of the project site (Google 2023). The Project area is not

within the Redlands Airport Influence Area on the Redlands Municipal Airport Compatibility Map with the western boundary of Orange Street just North of East Lugonia Avenue (City 2002). The western boundary is approximately 0.75 miles northeast of the project site. The Project is not within 2.0 miles of a public airport, private airfield, or within an airport land use plan. Therefore, the Project would not expose people residing or working in the Project area to excessive airport- or airstrip-related noise levels and resulting in a less than significant impact.

**4.14 POPULATION AND HOUSING**

14.	POPULATION AND HOUSING. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**4.14.1 Impact Analysis**

*a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

**Less than Significant Impact.** The Proposed Project would construct a commercial facility consisting of a used automobile and conditioning facility on undeveloped land. The Project site is zoned for commercial uses and the surrounding uses consists of commercially operated businesses. The Proposed Project does not propose construction/extension of roads or other infrastructure that could create substantial unplanned growth. The Proposed Project does not include construction of new residential facilities that would increase population growth within the Specific Plan area.

The construction and operation of the Proposed Project would create temporary and permanent jobs within the City (up to 80 workers in the day shift and 120 workers in the evening). However, the Proposed Project is expected to hire from the local population and would therefore not create significant population growth. Impacts therefore would be less than significant.

*b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

**Less than Significant Impact.** The Project site is undeveloped and zoned for commercial uses. The properties surrounding the Proposed Project have been designated for commercial purposes. There are no residential communities or housing on or adjacent to the Project site. Therefore, the Proposed Project would not displace people from existing housing and would not require construction of replacement housing. Impacts would be less than significant.



**4.15 PUBLIC SERVICES**

15.	PUBLIC SERVICES.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
	i) Fire Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	ii) Police Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**4.15.1 Impact Analysis**

a) *i) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?*

*ii) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?*

**Less than Significant Impact.** The Proposed Project would not affect the service standards related to police protection and fire protection. The Proposed Project site is located approximately 1 mile southeast of the Redlands Police Station and Redlands Fire Station 264 (Google 2023).

The Proposed Project would not result in population growth requiring the expansion of existing services or the creation of new services. In addition, there would be no demand for increased police and fire protection throughout the area. The area is currently being serviced by the Redlands Police Station and Fire Station 264 and would continue to receive the same services as nearby land uses. While there may be temporary travel delays during construction with the presence of construction vehicles entering and exiting the Project area transporting heavy equipment, they would not create a long-term and significant delay for police protection in the area. Impacts would be less than significant.

*iii) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?*

**Less than Significant Impact.** There are no schools within ¼ mile of the proposed Project. The nearest schools include the Redlands Adventist Academy located 0.9 miles to the South, and Orangewood High School and Redlands eAcademy (located on the Orangewood High School campus) approximately 0.5 mile to the Southeast. Both locations are on the other side of I-10 from the Project site.

Despite its proximity, the development of the Proposed Project would not induce population growth requiring the creation of new services. Additionally, The Proposed Project would not increase the demand for schools in the City. While there may be temporary travel delays during construction with the presence of construction vehicles and equipment traveling along the roadway, these would occur during construction and are not expected to create long term and significant delay to those accessing the school campus. Impacts would be less than significant.

*iv) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?*

**Less than Significant Impact.** The Proposed Project would not induce population growth requiring the extension of existing or creation of new park services. The nearest parks to the Project site is the Community Park located at East San Bernardino Avenue and Church Street, approximately 1 mile to the northeast, and Terrace Park, approximately one mile east of the Project site. The construction and operation of the Proposed Project would not result in the deterioration or alteration of nearby parks. Impacts, therefore, would be less than significant because of the Project's distance from the parks.

*v) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?*

**Less than Significant Impact.** The Proposed Project would not induce growth requiring the extension of existing or creation of new services. Construction of the Proposed Project would not result in the demand for expansion or the addition of new service areas as the Project site, and surrounding areas are developed and are serviced by existing utilities and other service providers. Impacts would be less than significant.

**4.16 RECREATION**

16.	<b>RECREATION. Would the project:</b>	<b>Potentially Significant Impact</b>	<b>Less than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
(a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**4.16.1 Impact Analysis**

a) *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

**No Impact.** The increased use of existing parks and recreational facilities typically results from a substantial increase in population growth or a lack of recreational facilities in an area. The Proposed Project is the construction of an automobile facility within the commercial district area of the Specific Plan. The Proposed Project would not result in a substantial increase in population growth that would increase the use of existing recreational facilities as it does not propose new residential facilities, nor does it involve the construction or removal of recreational facilities.

The Proposed Project would create temporary and permanent employment with construction and operation of the Proposed Project. The anticipated number of temporary and permanent employees would not result in an increased use of existing neighborhood due to the temporary presence of the construction workers. Additionally, employees of the Proposed Project are expected to be filled by the local workforce. Therefore, the Proposed Project would not result in the substantial physical deterioration of recreational facilities. Therefore, no impacts would occur associated with parks or recreational facilities.

b) *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

**No Impact.** The Proposed Project does not include construction or expansion of recreational facilities. The Project site is undeveloped and zoned for commercial uses. Properties surrounding the Project site consist of various commercial businesses, or lands designated for commercial use. Therefore, the Proposed Project would not create an adverse physical effect on the environment through construction or expansion of recreational facilities, resulting in no impact.

**4.17 TRANSPORTATION**

17.	<b>TRANSPORTATION. Would the project:</b>	<b>Potentially Significant Impact</b>	<b>Less than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
(a)	Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Substantially increase hazards due to a geometric design feature (e. g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**4.17.1 Impact Analysis**

Kimley-Horn prepared a Traffic Study for the Proposed Project dated April 2024. The Traffic Study (Appendix K) was prepared to evaluate and address the traffic-related effects from the Proposed Project.

As described in Appendix K, existing traffic volumes for the study intersections were collected in June 2023, while school was in session. Under Existing Conditions, all study intersections currently operate at an acceptable Level of Service during the morning and evening peak hours. The project is estimated to generate approximately 552 trips daily, with 15 trips in the morning peak hour and 27 trips in the evening peak hour.

- a) *Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities?*

The Traffic Study in Appendix K was conducted in accordance with the City of Redlands traffic study requirements, including Measure “U”, and in accordance with the San Bernardino Association of Governments (SANBAG) Congestion Management Program (CMP) requirements. Project-related traffic volumes were added to existing volumes to establish the conditions for the Existing Conditions Plus Project scenario. With the addition of project traffic to existing volumes, all study intersections would continue to operate at an acceptable Level of Service. The details of the analysis are included in Appendix K. Note that CEQA Guidelines section 15064.3(a) states, “a project’s effect on automobile delay shall not constitute a significant environmental impact” for CEQA analysis purposes. Only VMT may be used to evaluate transportation impacts under CEQA (see part “b” below for further discussion).

The main access to the Project site will be through West Lugonia Avenue and New York Street. Vehicular access provisions for the Project site would be provided via one unsignalized full-movement driveway at the intersection of New York Street and Brockton Avenue. Based on the City of Redland’s Measure “U” requirements, no improvements are required for the proposed project. Therefore, the Proposed Project would not conflict with any program or plan addressing the circulation system in the Project area, resulting in a less than significant impact.

b) *Would the project Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

**Less than Significant.** Senate Bill 743 (SB 743) was approved by the California legislature in September 2013. SB 743 requires changes to CEQA, specifically directing the Governor’s Office of Planning and Research (OPR) to develop alternative metrics to the use of vehicular “Level of Service” (LOS) for evaluating transportation projects. OPR has prepared a technical advisory (“OPR Technical Advisory”) for evaluating transportation impacts in CEQA and has recommended that VMT replace LOS as the primary measure of transportation impacts. The Natural Resources Agency has adopted updates to CEQA Guidelines to incorporate SB 743 that requires VMT for the purposes of determining a significant transportation impact under CEQA.

The City of Redlands CEQA Assessment VMT Analysis Guidelines provide details on appropriate screening thresholds that can be used to identify when a proposed land use project is anticipated to result in a less-than-significant impact without conducting a more detailed level analysis. Screening thresholds include the following three categories:

1. Transit Priority Area (TPA) Screening
2. Low VMT Area Screening
3. Project Type Screening

Land development projects that meet one or more of the above screening thresholds may be presumed to create a less-than-significant impact on transportation and circulation. The screening thresholds were reviewed and evaluated for this project.

Projects located within a TPA may be presumed to have a less-than-significant impact. A TPA is defined as a half-mile area around an existing major transit stop along a high-quality transit corridor. ‘Major transit stop’ means a site containing an existing rail station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and evening peak commute periods. A ‘high-quality transit corridor’ means a corridor with a fixed route bus service with service intervals no longer than 15 minutes during the peak commute hours.

Based on the San Bernardino County Transportation Authority (SBCTA) VMT Screening Tool, the Project is located within a TPA. However as provided in Appendix K, based on discussion with City staff, because the Project has a floor area ratio (FAR) of less than 0.75 and includes more parking than required by the jurisdiction, the TPA screening would not apply. Therefore, TPA Screening criteria is not met by the Project.

Projects located within a low VMT generating area (VMT per worker, 15% below County baseline) may be presumed to have a less-than-significant impact. Based on the SBCTA VMT Screening Tool, the project is not located in a Low VMT Area. The results of the SBCTA VMT Screening Tool are provided in Appendix K.

The proposed Used Auto Sales and Service Facility project is intended to serve the local community. The nearest CarMax locations in the Redlands/Calimesa/Beaumont area (along the I-10) is approximately 20 to 30 miles away to the west in the City of Riverside (7980 Auto Drive) and even farther way to the east in the City of Palm Desert (73450 Dinah Shore Drive). With the proposed project location in the City of Redlands, residents and employees in the Redlands/Calimesa/Beaumont

area would not travel as far to work nor travel as far to receive the services that the Proposed Project can provide. As a result, the overall VMT in the noted area would be reduced by providing a retail project that is local serving in nature. As such, the proposed project meets the intent of SB 743 due to the reduction of VMT by providing a local-serving use.

Per the City of Redlands CEQA Assessment VMT Analysis Guidelines, based on the proposed use and estimated daily trips for the project, the Proposed Project would generate less than 3,000 MT CO<sub>2e</sub> per year (2,823.70 MT CO<sub>2e</sub> per year) as discussed in Section 4.9.1 Greenhouse Gases. As a result, the Proposed Project can be presumed to have a less-than-significant VMT impact and would meet the Project Type Screening criteria.

Based on review of the VMT screening criteria, the project meets the Project Type Screening threshold. Therefore, the project would result in a less-than-significant transportation impact, and no additional VMT analysis is required.

- c) *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?*

**Less than Significant Impact.** The Proposed Project would introduce new traffic flows along New York Street, including ingress and egress to the Project site. While this introduces new features to the site, the Project construction does not include sharp curves or dangerous intersections. Additionally, the Proposed Project is not an incompatible use to the area. Impacts therefore would be less than significant.

- d) *Would the project result in inadequate emergency access?*

**Less than Significant Impact.** The Project site is accessible through Lugonia Avenue and Colton Avenue. Construction and operation of the Proposed Project would not interrupt emergency access to and from the Project site. As described in Section 1.3 Project Description, an additional driveway for emergency access with Knox Box access only will be at the north end of the sales/display lot. Additionally, the operation of the Proposed Project would not interfere with implementation the San Bernadino County Emergency Operations Plan or the City’s Hazard Mitigation Plan. Impacts therefore would be less than significant.

**4.18 TRIBAL CULTURAL RESOURCES**

18.	<b>TRIBAL CULTURAL RESOURCES.</b> <b>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</b>	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

18.	<b>TRIBAL CULTURAL RESOURCES.</b> <b>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</b>	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(b)	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**4.18.1 Impact Analysis**

a) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?*

**No Impact.** As verified by the cultural resources survey for the Proposed Project conducted dated December 2023 (Appendix D), the Proposed Project site does not contain any structures listed or eligible for listing in the CRHR, or in a local register of historic resources as defined in PRC Section 5020.1(k). No impact would occur.

b) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

**Less Than Significant Impact with Mitigation Incorporated.** On October 9, 2023, the Chambers Group requested that the NAHC conduct a search of its SLF to determine if resources important to Native Americans have been recorded in the Project footprint and buffer area. On November 29, 2023, the NAHC responded stating that the search results were positive. Based on the results of the record search review and background research, there is potential to encounter buried archaeological and paleontological resources. Similarly, consultation with the Native American groups have indicated the possible presence of additional significant resources.

The City sent letters to all of the tribes recommended by the NAHC to conduct consultation. The City of Redlands received several initial responses from multiple Native American Tribes and opened



consultations accordingly in compliance with State law. No information or evidence has been presented to the City indicating that any tribal cultural resources are present or likely to be present on the project site or in the immediate vicinity of the project site. However, the City has agreed to implement certain mitigation measures to minimize any potentially significant impacts in the event of any inadvertent discoveries of tribal cultural resources. The City received suggested mitigation measures from the following tribes: Kizh Nation, the Morongo Band of Mission Indians, and the Yuhaaviatam of San Manuel Nation. As such, in addition to the mitigation measures noted in CUL-1 through CUL-6, TCR-1 through TCR-4 will be implemented to address and avoid any potential impacts to tribal cultural resources (TCR). Impacts associated with substantial adverse change in the significance of a tribal cultural resource are therefore less than significant with mitigation incorporated.

**TCR-1 Tribal Monitoring Services Agreement.** Prior to the issuance of the grading permits, the Applicant shall enter into a Tribal Monitoring Services Agreement with the Consulting Tribe(s). There shall be one monitor for the Gabrieleño Band of Mission Indians-Kizh Nation, and one monitor for the other Consulting Tribes (Morongo Band of Mission Indians, Yuhaaviatam of San Manuel Nation). The Tribal Monitors shall be on-site during all ground-disturbing activities (including, but not limited to, clearing, grubbing, tree and bush removal, grading, trenching, fence post placement and removal, construction excavation, excavation for all utility and irrigation lines, and landscaping phases of any kind). The Tribal Monitor shall have the authority to temporarily divert, redirect, or halt the ground-disturbing activities within 60 feet of the inadvertent discovery to allow identification, evaluation, and potential recovery of tribal cultural resources.

A copy of the executed monitoring agreement with each Consulting Tribe shall be submitted to the lead agency prior to the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

On-site tribal monitoring shall conclude upon the latter of the following: (1) written confirmation to the Consulting Tribe[s] from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or

(2) a determination and written notification by the Consulting Tribe[s] to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Consulting Tribe[s]TCRs.

- TCR-2 Native American Monitor.** Native American monitor(s) selected by the tribe should be present at the Project kickoff meeting, and shall be provided with a schedule of initial ground-disturbing activities, be on-site at the commencement of ground-disturbing activities related to the Project, and as the Project proceeds adjusting personnel and schedule as needed to provide sufficient oversight. The developer, lead contractor, and all subcontractors shall routinely update the Native American monitor(s) and their scheduling representative(s) regarding scheduling for ground-disturbing activities, and changes to said schedule, such that there is sufficient advance notice that a Native American monitor can be scheduled accordingly.
- TCR-3 Worker Environmental Awareness Program (WEAP)/Pre-Grade Meeting.** Prior to commencing construction activities and thus prior to any ground disturbance in the Proposed Project site, the Tribal Monitor(s) shall conduct initial WEAP training/pre-grade meeting for all construction personnel, including supervisors, present at the outset of the Project construction work phase, for which the lead contractor and all subcontractors shall make their personnel available. This WEAP training will educate construction personnel on how to work with the tribal monitor(s) to identify and minimize impacts to tribal cultural resources and maintain environmental compliance, and be performed periodically for new personnel coming on to the Project as needed. The retained Consulting Tribe(s) representative(s) shall attend the WEAP meeting with the grading contractors to explain and coordinate the requirements of the monitoring plan.
- TCR-4 Inadvertent Discovery of Human Remains.** The Consulting Tribes request the following specific conditions to be imposed in order to protect any inadvertent discovery of Native American human remains and/or cremations. No photographs are to be taken except by the County Coroner, with written approval by the Consulting Tribe(s) if applicable.
- A. Should human remains and/or cremations be encountered on the surface or during any and all ground-disturbing activities (i.e., clearing, grubbing, tree and bush removal, grading, trenching, fence post placement and removal, construction excavation, excavation for all water supply, electrical, and irrigation lines, and landscaping phases of any kind), work in the immediate vicinity of the discovery shall immediately stop within a 100-foot perimeter of the discovery. The area shall be protected; project personnel/observers will be restricted. The County Coroner is to be contacted within 24 hours of discovery. The County Coroner has 48 hours to make his/her determination pursuant to State and Safety Code §7050.5. and PRC § 5097.98.

- B. In the event that the human remains and/or cremations are identified as Native American, the Coroner shall notify the NAHC within 24 hours of determination pursuant to subdivision (c) of HSC §7050.5.
- C. In the event that the human remains and/or cremations are identified as Native American, the Coroner shall notify the NAHC within 24 hours of determination pursuant to subdivision (c) of HSC §7050.5.
- D. If any of the Consulting Tribes has been named the MLD, the Tribe may wish to rebury the human remains and/or cremation and sacred items in their place of discovery with no further disturbance where they will reside in perpetuity. The place(s) of reburial will not be disclosed by any party and is exempt from the California Public Records Act (California Government Code § 6254[r]). Reburial location of human remains and/or cremations will be determined by the Tribe's MLD, the landowner, and the City Planning Department.

**TCR-5: Pre-Grade Meeting.** A Native American monitor(s) selected by the tribe should be present at the Project kickoff meeting, be provided with a schedule of initial ground-disturbing activities and be on-site at the commencement of ground-disturbing activities related to the Project, and as the Project proceeds adjusting personnel and schedule as needed to provide sufficient oversight. The Consultant, lead contractor, and all subcontractors shall routinely update the Native American monitor and their scheduling representative(s) regarding scheduling for ground-disturbing activities, and changes to said schedule, such that there is sufficient advance notice that a Native American monitor can be scheduled accordingly.

**TCR-6 Inadvertent Discovery of Tribal Cultural Resources and Treatment.** In the event that previously unidentified tribal cultural resources are unearthed during construction, the Tribal Monitor(s) shall have the authority to temporarily divert and/or temporarily halt ground-disturbance operations in the area of discovery (within 60 feet) to allow for the evaluation of potentially significant tribal cultural resources. Tribal isolates and clearly non-significant tribal cultural deposits shall be minimally documented in the field and collected so the monitored grading can proceed.

If a potentially significant tribal cultural resource(s) is discovered, work shall stop within a 60-foot perimeter of the discovery and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. All work shall be diverted away from the vicinity of the find, so that the find can be evaluated by the Tribal Monitor(s). The Archaeologist and/or Tribal Monitor(s) shall notify the Lead Agency and other Consulting Tribe(s) of said discovery. The Tribal Monitor(s), in consultation with the Lead Agency and the other Consulting Tribe(s), shall determine the significance of the discovered tribal cultural resource. A recommendation for the treatment and disposition of the Tribal Cultural Resource shall be made by the Tribal Monitor(s), in consultation with the Lead Agency and the other Consulting Tribe(s) and be submitted to the Lead Agency for review and approval. Below are the possible treatments and dispositions of significant cultural resources in order of CEQA preference:

- A. Full avoidance
- B. If avoidance is not feasible, Preservation in place.

- C. If Preservation in place is not feasible, all items shall be reburied in an area away from any future impacts and reside in a permanent conservation easement or Deed Restriction.
- D. If all other options are proven to be infeasible, data recovery through excavation and then curation in a Curation Facility that meets the Federal Curation Standards (CFR 79.1)

**TCR-7 Final Report.** The final report(s) created as a part of the project (AMTP, isolate records, site records, survey reports, testing reports, etc.) shall be submitted to the Lead Agency and Consulting Tribe(s) for review and comment, to the extent permitted by law. After approval of all parties, the final reports are to be submitted to the local repository (Eastern Information Center or SCCIC), as well as providing follow-up reports of any finds to the Eastern Information Center or SCCIC, as required, and the Consulting Tribe(s) if authorized by law.

**4.19 UTILITIES AND SERVICE SYSTEMS**

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

**4.19.1 Impact Analysis**

The City of Redlands operates its own water and wastewater utilities, cemetery, airport, landfill and solid waste services (City 2023).

- a) *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or expansion of which could cause significant environmental effects?*

**Less than Significant Impact.** The project site would be serviced by Southern California Gas Company for natural gas, Southern California Edison for electricity, Charter Communications for telecommunication services, and the City of Redlands for water and wastewater. There are existing connections in the vicinity of the project site for gas and electricity and Will Serve letters have been received from Southern California Gas Company and Charter Communications. No off-site expansions required.

Wastewater generation during operations would be minimal, as most of the water used in the carwash would be recycled and restroom facilities would serve customers and the approximately 200 workers. The City of Redlands 2021 Wastewater Master Plan capacity analysis indicated that the present treatment system is sufficient to meet projected demands in the near terms, long term, and ultimate buildout (City 2021b). As described in the Drainage Report (Appendix I) the analysis of the proposed storm water management system design would accommodate a 100-year storm up to a 24-hour event. It has been estimated, by the Applicant, that the project would use 33,630 gallons of freshwater per month, which is equivalent to 1.24 acre feet per year (AF/Y). The City of Redlands provides water to the City and its Sphere of Influence. The Redlands 2020 UWMP that is Part 2 Chapter 4 of the 2020 Upper Santa Ana River Watershed Integrated Regional UWMP indicates the 2025 water supply including recycled water is 31,039 AF. The projected water use in 2025 is 25,818 AF including 3,081 AF of Commercial/Institutional use (City 2021b). The projected use by the project is .004 percent of the projected Commercial/Institutional use in 2025. Therefore, there are less than significant impacts associated with relocated or new construction of utilities.

- b) *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal dry and multiple dry years?*

**Less than Significant Impact.** As described in Section 4.9 Hydrology and Water Quality, Redlands obtains water from surface water from Mill Creek Watershed and Santa Ana River Watershed, groundwater from the Bunker Hill Subbasin and Yucaipa Subbasin, recycled water and water imported from the SWP as needed. During wet years, the City contributes to regional efforts to recharge the Bunker Hill Basin so there is availability in dry years when other sources may be limited (City 2021b). The 2020 Upper Santa Ana River Watershed Integrated Regional UWMP includes an analysis of the water supply reliability assessment up to five consecutive dry water years. The assessment is based on a 10% increase throughout the five-year drought, to be conservative. The results of the analysis indicated that Redlands does not anticipate any water shortage due to consecutive dry years. Therefore, the proposed project included in the East Valley Corridor Specific Plan area projected to consume 1.24 AF/Y would have a less than significant impact on water supply in the foreseeable future during multiple dry years.

- c) *Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

**Less than Significant Impact.** The City of Redlands 2021 Wastewater Master Plan future flow projections included 1.1 million gallons per day (MGD) of wastewater flow for 55 developments

currently planned to be built between 2020 and 2030 in addition to the City-wide forecasted population growth. The development plans would include the proposed project because it is part of the East Valley Corridor Specific Plan area and would be constructed before 2030. Therefore, adequate capacity to serve the project is available and the associated impacts would be less than significant.

- d) *Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*
- e) *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

**d & e) Less than Significant Impact.** The California Street Landfill is owned and operated by the City of Redlands and has a remaining capacity of 5,168,182 cubic yards and a permitted throughput of 829 tons per day per CalRecycle. As stated in the Redlands Strategic Plan, in 2017, the City Council adopted a new solid waste rate structure, which included funding designated for capital improvement projects and the purchase of more efficient landfill equipment. This has resulted in increased usable capacity of the landfill by 42 percent. SB 1383, effective January 1, 2022, brought regulations aimed to divert 50% of organic waste from landfills below 2014 levels by 2020 and 75% by 2025. The Strategic Plan also states the City has met and exceeded all required state mandates outlined in SB 1383.

The Project proposes to construct a pre-owned automobile sales, refurbishing, and reconditioning facility with outdoor vehicle storage on currently undeveloped land; therefore, no demolition is required. CalRecycle provides an estimate of 0.9 lb/100 sq ft/ day for auto dealer and service station. The proposed facility has 49,491 sq ft of building footprint. Using the CalRecycle estimate, the facility would generate 445 lbs per day (0.2225 tons per day) resulting in approximately 0.03 percent of the permitted throughput at the California Street Landfill (CalRecycle 2006, 2023).

**4.20 WILDFIRE**

20.	<b>WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</b>	<b>Potentially Significant Impact</b>	<b>Less than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
(a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### 4.20.1 Impact Analysis

- a) *Would the project impair an adopted emergency response plan or emergency evacuation plan?*

**Less than Significant Impact.** The Proposed Project site is not located within a very high fire hazard severity zone of state or local responsibility (CAL FIRE 2023). In addition, the Proposed Project would not interfere with an evacuation or emergency plan as discussed in Section 4.8.1 f) Hazards and Hazardous Materials. Impacts would be less than significant.

- b) *Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

**No Impact.** As described in Section 4.8.1 g) Hazards and Hazardous Materials, the project site will be primarily covered with asphalt, cement, and buildings as 11.92 acres will be impervious areas and 5.4 acres would be landscaped/grassy areas. It would not exacerbate wildfire risk. The Project site is located outside of the State and locally classified as a very high fire hazard severity zone. Much of the area surrounding the proposed Project is built out and the undeveloped area has minimal vegetation. Therefore, the project would not exacerbate wildfire risks, resulting in no impact.

- c) *Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

**Less than Significant.** New infrastructure would be required for the proposed project operations. However much of the electrical distribution in the area is underground. Currently, it is not known if the proposed project would have all underground utility connections. However as stated in b), the Project site would not exacerbate wildfire risks, because it is an essentially built out area. New roads would not be constructed as part of the project. The project would have a less than significant impact associated with infrastructure that may exacerbate fire risk.

- d) *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability or drainage changes?*

**No Impact.** As discussed in Section 4.6.1 iv) Geology and Soils, the Project area is not in a landslide susceptibility zone (County 2021). The project site is relatively flat which is supported by the Geotechnical Engineering Report in Appendix E. Most of the surrounding area is built out and the undeveloped area has minimal vegetation. Therefore, there would be no impact from the Project associated with downslope or downstream flooding or landslides.



**4.21 MANDATORY FINDINGS OF SIGNIFICANCE**

21.	MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects?)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**4.21.1 Impact Analysis**

*a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?*

**Less than Significant Impact with Mitigation.** A Biological Resources Letter Report and Cultural Resources Survey and Study Letter Report (Appendices C and D) were prepared to identify if the Proposed Project would have the potential to substantially degrade the quality of the biological resources and eliminate important examples of major periods of California history or prehistory.

The results of the Biological Resources Letter Report (Appendix C), as analyzed in Section 4.4, resulted in less than significant impacts to most of the resources identified, such as riparian habitats and natural communities, federally protected wetlands, migratory fish, or wildlife species, and for areas that have been identified to be in habitat conservation plans. Mitigation measures are required to ensure that special status species of concern (BUOW) and nesting birds would have a less than significant impact during construction (MM BIO-1 and MM BIO-2).

The results of the Cultural Report, as analyzed in Sections 4.5 Cultural Resources, 4.7 Geology and Soils, and 4.18 Tribal Resources, resulted in less than significant impacts to historical resources and less than significant impacts with mitigation related to archaeological and paleontological resources. As discussed in Appendix D (Cultural Report), fossil localities have been recorded within the area

surrounding the Project site and the existence of similar fossil-bearing geologic units are mapped underlying the Project site. There is a possibility of buried resources being identified below surface during grading and other ground disturbances. Implementation of mitigation measures CUL-1 through CUL-4, GEO-2 and GEO-3, and TRC 1 through 7 would result in less than significant impacts to the potential discovery of these resources.

- b) *Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)*

**Less Than Significant Impact.** The Project does not have potential impacts that are individually limited, but cumulatively considerable. Based on the analysis contained in the above Sections, the proposed Project would not result in any significant and unmitigable impacts in any environmental categories. In all cases, effects associated with the Project would be limited to the existing Project Area/disturbance footprint and either result in no new impacts, less than significant impacts, or less than significant impacts with mitigation incorporated. As such, Project impacts are of such a negligible degree that they would not result in a significant contribution to any cumulative impacts.

According to the City’s Planning Division Major Project List, updated in April 2024, the Tennessee Village Project is in progress. The Tennessee Village project is located east of Tennessee Street, approximately 500 feet north of East Lugonia Avenue, and approximately 950 feet north of the Project site. The Tennessee Village project proposes amending the zoning designation from EVCS to C-3 for construction of a mixed-use project, including 460 apartments and 18,000 sq. ft. of commercial space (City 2024). Also, the Liberty Lane Apartments are about a quarter mile north on the opposite side of W Lugonia Avenue from the Project site. The Liberty Lane Apartments are comprised of 80 apartments for veterans and special needs households. This Project is currently under construction.

While these projects will occur nearby the Proposed Project, the impacts associated with the Proposed Project would not be significant when compared to applicable thresholds; therefore, none of the impacts associated with the Project would make cumulatively considerable, incremental contributions to significant cumulative impacts.

- c) *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

**Less than Significant Impact with Mitigation.** Substantial adverse effects on human beings directly or indirectly are primarily resulting from impacts to air quality, geology and soil, greenhouse gas emissions, hazardous materials, land use, noise, and wildfire. A Health Risk Assessment was prepared by Kimley-Horn dated January 2024 to evaluate potential health risks associated with TAC and DMP from the construction of the Project. The analysis resulted that impacts related to health risk from the Project would be less than significant and the Project’s contribution would be less than cumulatively considerable (Appendix B).

As discussed in 4.7 Geology and Soils, unstable soils are present on the Project site that could create subsidence. Methods and specifications to replace the soil to eliminate the risks of soil instability were identified in Appendix E and incorporated into mitigation measure GEO-1 to reduce impacts associated with unstable soil to less than significant.

In Section 4.9 Hazards and Hazardous Materials, a hazardous waste site approximately 602 feet to the northeast of the project was identified and previously determined to have heating oil impacting soil. DTSC noted that the groundwater was not adequately characterized to determine if a release occurred at Teledyne. As the contaminated site is near the Project site, and the characterization of the impacts may not have been conclusive, mitigations measures HAZ-1 and HAZ-1 have been included as a precaution to avoid toxic exposure to workers and the public if unanticipated contaminated soil is encountered during construction. Therefore, implementation of the mitigations would result in a less than significant impact associated hazardous materials site resulting in creation of a significant hazard to the public or the environment would be less than significant.

As analyzed in this initial study and the technical reports attached in the appendices, impacts associated with air quality, greenhouse gas, land use, noise, and wildfire have been determined to be less than significant as the Proposed Project's construction and operations will comply with the City's General Plan policies and Municipal Code. Impacts therefore will be less than significant.

### **SECTION 5.0 – – MITIGATION, MONITORING AND REPORTING PLAN**

Public Resources Code, Section 21081.6 (Assembly Bill 3180) requires that mitigation measures identified in environmental review documents prepared in accordance with California Environmental Quality Act (CEQA) are implemented after a project is approved. Therefore, this Mitigation Monitoring and Reporting Program (MMRP) has been prepared to ensure compliance with the adopted mitigation measures during the Pre-, During, and Post-construction phases of Used-Car Retail Development and Refurbishing Facility Project and Amendment No. 51 to the East Valley Corridor Specific Plan.

The City is the agency responsible for implementation of the mitigation measures identified in the MND. This MMRP provides the City with a convenient mechanism for quickly reviewing all the mitigation measures including the ability to focus on select information such as timing. The MMRP includes the following information for each mitigation measure:

- The phase of the project during which the required mitigation measure must be implemented, and
- The monitoring agency.

The MMRP includes a checklist to be used during the mitigation monitoring period. The checklist will verify the name of the monitor, the date of the monitoring activity, and any related remarks for each mitigation measure.

Mitigation Measure	Implementation Phase	Monitoring Agency	Level of Significance After Mitigation Less than Significant (LTS)	Verification of Compliance		
				Initial	Date	Remarks
<b>BIOLOGICAL RESOURCES</b>						
<b>BIO-1: Preconstruction Survey</b> A preconstruction burrowing owl (BUOW) survey shall be conducted no less than 14 days prior to initiating ground disturbance (including clearing, grubbing, grading), and a final survey within 24 hours prior to ground disturbance, to determine whether BUOW or BUOW burrows are present within or adjacent to the Project site, and to avoid negative impacts and direct take of BUOW. If BUOW are confirmed on-site, avoidance measures will be developed and implemented in compliance with and in coordination with CDFW. The results of the survey shall be documented and filed with the City.	Pre-Construction	Project Proponent, City of Redlands	LTS			
<b>BIO-2: Nesting Bird Survey</b> Construction activities shall take place outside nesting season (nesting typically February 1 to August 31) to the greatest extent practicable. If construction activities occur during nesting season, a preconstruction nesting bird survey shall be conducted within seven days prior to initiation of ground-disturbing activities (including any clearing, grubbing, or grading), or according to the to the survey timing in the Project permits. If an active nest is identified, a minimum avoidance buffer around the active nest should be determined and implemented by a qualified biologist to avoid impacts to the active nest. The buffer shall be established with flagging and stakes or construction fencing. A minimum 100-foot no-disturbance buffer shall be placed around passerine nests. For raptors, the no-disturbance buffer shall be expanded to 500 feet. The buffer should be maintained during physical ground-disturbing activities. Once the qualified biologist has determined that nesting has ceased, and the nestlings have fledged and are no longer using the nest, the buffer may be removed. Biological monitoring should be conducted as needed during the nesting season to monitor the status of any active nests, survey for any new nests, and to refresh nesting bird surveys after any periods of construction inactivity. The results of the survey shall be documented and filed with the City.	Pre-Construction/Construction	Project Proponent, City of Redlands	LTS			

Mitigation Measure	Implementation Phase	Monitoring Agency	Level of Significance After Mitigation Less than Significant (LTS)	Verification of Compliance		
				Initial	Date	Remarks
<b>CULTURAL RESOURCES</b>						
<b>CUL-1 Retain Cultural Resource Consultant.</b> The Developer shall retain the services of a qualified cultural resources consultant “Consultant” and require that all initial ground disturbing work be monitored by a cultural resources monitor. This includes all initial construction activities that will potentially expose or encounter intact subsurface sediments underlying the Project site. The cultural resources consultant shall provide a Qualified Archaeologist, meeting the Secretary of the Interior Standards (U.S. Department of the Interior, 2008), and require that all initial ground-disturbing work be monitored by a cultural resources monitor (monitor) proficient in artifact and feature identification in monitoring contexts. The Consultant (Qualified Archaeologist and/or monitor) shall be present at the Project construction phase kickoff meeting. The Archaeologist will conduct Cultural Resource Sensitivity Training. The training session will focus on the archaeological and cultural resources that may be encountered during ground-disturbing activities as well as the procedures to be followed in such an event. The Archaeologist shall be present during all ground-disturbing activities to identify any known or suspected archaeological and/or cultural resources.	Pre-Construction/Construction	Project Proponent, City of Redlands	LTS			
<b>CUL-2</b> Prior to commencing construction activities and thus prior to any ground disturbance in the Proposed Project site, the Consultant shall conduct initial Worker Environmental Awareness Program (WEAP) training to all construction personnel, including supervisors, present at the outset of the Project construction work phase, for which the lead contractor and all subcontractors shall make their personnel available. This WEAP training will educate construction personnel on how to work with the archaeological/cultural Monitor(s) to identify and minimize impacts to archaeological and cultural resources and maintain environmental compliance and be performed periodically for new personnel coming on to the Project as needed.	Pre-Construction	Project Proponent, City of Redlands	LTS			

Mitigation Measure	Implementation Phase	Monitoring Agency	Level of Significance After Mitigation Less than Significant (LTS)	Verification of Compliance		
				Initial	Date	Remarks
<p><b>CUL-3</b> The developer or contractor shall provide the Consultant and Monitor with a schedule of initial potential ground disturbing activities. A minimum of 48-hours' notice will be provided to the archaeological Consultant and/or Monitor of commencement of any initial ground disturbing activities that have potential to expose or encounter intact subsurface sediments underlying the Project site. These activities may include grading, trenching, and mass excavation.</p> <ul style="list-style-type: none"> <li>As detailed in the schedule provided, a monitor shall be present on-site at the commencement of ground-disturbing activities related to the Project. The Consultant shall observe initial ground disturbing activities and, as they proceed, adjust the monitoring approach as needed to provide adequate observation and oversight. All monitors will have stop-work authority to allow for the recordation and evaluation of finds during construction. The monitor will maintain a daily record of observations as an ongoing reference resource and to provide a resource for final reporting upon completion of the Project.</li> <li>The Consultant, the lead contractor, and subcontractors shall maintain a line of communication regarding schedule and activity such that the Consultant is aware of all ground-disturbing activities in advance in order to provide appropriate oversight.</li> </ul>	Pre-Construction/Construction	Project Proponent, City of Redlands	LTS			
<p><b>CUL-4</b> If archaeological or cultural resources are discovered, construction shall be halted within 50 feet of any archaeological or cultural artifacts or features and within 100 feet of any potential human remains at the discretion of the Archaeologist, and shall not resume until the Qualified Archaeologist, in consultation with consulting Tribe(s) and the City, can determine the significance of the find and/or the find has been fully investigated, appropriately documented, and cleared. (See also TCR -1 through TCR-7.)</p>	Pre-Construction/Construction	Project Proponent, City of Redlands	LTS			
<p><b>CUL-5</b> At the completion of all ground disturbing activities, the Consultant shall prepare a Cultural Resources Monitoring Report summarizing all monitoring efforts and observations, as performed, and any and all prehistoric or historic archaeological finds, as well as providing follow-up reports of any finds to the Eastern Information Center or SCCIC, as required.</p>	Construction/Post-Construction	Project Proponent, City of Redlands	LTS			

Mitigation Measure	Implementation Phase	Monitoring Agency	Level of Significance After Mitigation Less than Significant (LTS)	Verification of Compliance		
				Initial	Date	Remarks
<b>GEOLOGY and SOILS</b>						
<p><b>GEO-1: Excavate Loose Soil and Replace with Engineered Fill</b> The subsurface soils within the proposed building pads will be removed to a minimum depth of 4 feet below existing site grades, or 2 feet below bottom of proposed foundations, whichever is greater. Deeper removals may be required if loose soils are still encountered at a depth of 4 feet below ground surface. Grading for the proposed structures should incorporate the limits of the footings plus 3 feet beyond the outside edge of perimeter footings. The bottoms of excavations should be probed to determine if it is firm and unyielding. Localized deeper removals may be needed where soft soils are encountered at the excavation bottom. Compacted engineered fill should then be placed to design finish grade elevations.</p> <p>Subgrade soils beneath exterior slabs and pavements should be removed to a depth of 1 foot below the proposed pavement section, including bottom of proposed aggregate base materials. Compacted engineered fill should then be placed to design elevations.</p> <p>Exposed areas receiving fill, once properly cleared and benched where necessary, should be scarified to a minimum depth of 10 inches, moisture conditioned, and compacted per the compaction requirements of the Terracon 2022 Geotechnical Engineering Report in Appendix E.</p>	Construction	Project Proponent, City of Redlands	LTS			
<p><b>GEO-2 Qualified Paleontologist.</b> Prior to issuance of a grading permit, the Applicant shall be required to obtain the services of a Qualified Project Paleontologist to remain on call for the duration of the proposed ground-disturbing construction activity. Upon approval or request by the City, a paleontological mitigation plan (PMP) outlining procedures for paleontological data recovery shall be prepared for the Project and submitted to the City for review and approval. The development and implementation of the PMP shall include consultations with the City's Engineering Geologist as well as a requirement that the curation of all specimens recovered under any scenario shall be through an appropriate repository agreed upon by the City. If the City accepts ownership, the curation location may be revised. The PMP shall include developing a multilevel ranking system, or Potential Fossil Yield Classification (PFYC), as a tool to demonstrate the potential yield of fossils within a given stratigraphic unit. The PMP shall outline the monitoring and salvage protocols to address paleontological resources encountered during Project-related ground-disturbing activities, as well as the appropriate recording, collection, and processing protocols to appropriately address any resources discovered.</p>	Pre- Construction/Construction	Project Proponent, City of Redlands	LTS			



Mitigation Measure	Implementation Phase	Monitoring Agency	Level of Significance After Mitigation Less than Significant (LTS)	Verification of Compliance		
				Initial	Date	Remarks
<p><b>GEO-3 Paleontological Report.</b> At the completion of all ground-disturbing activities, the Project Paleontologist shall prepare a final paleontological mitigation report summarizing all monitoring efforts and observations, as performed in line with the PMP, and all paleontological resources encountered, if any, as well as providing follow-up reports of any specific discovery, if necessary</p>	Construction/Post-Construction	Project Proponent, City of Redlands	LTS			
<b>HAZARDS AND HAZARDOUS MATERIALS</b>						
<p><b>HAZ-1 Unanticipated Contamination Discovery Plan.</b> An Unanticipated Contamination Discovery Plan (UCDP) will be developed prior to ground disturbing activities on the project site. Contractors will be trained on the requirements of the UCDP during pre-construction environmental training. The UCDP is intended to provide guidance to ensure worker and public safety as well as prevent the spread of further contamination if contaminated soils are encountered during construction of the Project. The UCDP will provide contact information for laboratories that will analyze the samples and solid waste facilities that will accept the contaminated soils. It will identify the procedures for:</p> <ul style="list-style-type: none"> <li>▪ Notification and documentation requirements;</li> <li>▪ Identification of the characteristics of the contaminated soil (e.g., sample methods, vertical and horizontal extent of contamination and chemicals of concern);</li> <li>▪ Determining baseline at which work can be reinitiated in the area;</li> <li>▪ handling and/or disposal requirements for any contaminated media unearthed.</li> </ul> <p>The UCDP shall be effective during all ground disturbing activities of the Project.</p>	Pre-Construction	Project Proponent, City of Redlands	LTS			

Mitigation Measure	Implementation Phase	Monitoring Agency	Level of Significance After Mitigation Less than Significant (LTS)	Verification of Compliance		
				Initial	Date	Remarks
<p><b>HAZ-2 Initial Response to Unanticipated Soil Contamination.</b> During excavation, indicators of possible contamination include, but are not limited to:</p> <ul style="list-style-type: none"> <li>▪ Stained or discolored earth, as contrasted to adjoining soil;</li> <li>▪ Fill material containing debris unearthed during trenching or grading;</li> <li>▪ Household trash covered by earth or other material that appears to be interspersed with industrial debris;</li> <li>▪ Gasoline smells or other hydrocarbon odors that emanate when the earth is disturbed; or</li> <li>▪ Oily residue intermixed with earth.</li> </ul> <p>Immediately following discovery of potentially hazardous waste or contaminants, the Contractor will:</p> <ul style="list-style-type: none"> <li>▪ Cease work in the vicinity of suspected contamination;</li> <li>▪ Cordon off or otherwise restrict access to the suspected area to protect workers and the public;</li> <li>▪ Notify the City and Project authorities; and</li> <li>▪ Implement the UCDP.</li> </ul>	Construction	Project Proponent, City of Redlands	LTS			

Mitigation Measure	Implementation Phase	Monitoring Agency	Level of Significance After Mitigation Less than Significant (LTS)	Verification of Compliance		
				Initial	Date	Remarks
<p>TRIBAL CULTURAL RESOURCES</p> <p><b>TCR-1 Tribal Monitoring Services Agreement.</b> Prior to the issuance of the grading permits, the Applicant shall enter into a Tribal Monitoring Services Agreement with the Consulting Tribe(s). There shall be one monitor for the Gabrieleño Band of Mission Indians-Kizh Nation, and one monitor for the other Consulting Tribes (Morongo Band of Mission Indians, Yuhaaviatam of San Manuel Nation). The Tribal Monitors shall be on-site during all ground-disturbing activities (including, but not limited to, clearing, grubbing, tree and bush removal, grading, trenching, fence post placement and removal, construction excavation, excavation for all utility and irrigation lines, and landscaping phases of any kind). The Tribal Monitor shall have the authority to temporarily divert, redirect, or halt the ground-disturbing activities within 60 feet of the inadvertent discovery to allow identification, evaluation, and potential recovery of tribal cultural resources.</p> <p>A copy of the executed monitoring agreement with each Consulting Tribe shall be submitted to the lead agency prior to the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.</p> <p>The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.</p> <p>On-site tribal monitoring shall conclude upon the latter of the following:                      (1) written confirmation to the Consulting Tribe[s] from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or                      (2) a determination and written notification by the Consulting Tribe[s] to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Consulting Tribe[s]TCRs.</p>	Pre-Construction/Construction	Project Proponent, City of Redlands	LTS			

Mitigation Measure	Implementation Phase	Monitoring Agency	Level of Significance After Mitigation Less than Significant (LTS)	Verification of Compliance		
				Initial	Date	Remarks
<p><b>TCR-2 Native American Monitor.</b> Native American monitor(s) selected by the tribe should be present at the Project kickoff meeting, and shall be provided with a schedule of initial ground-disturbing activities, be on-site at the commencement of ground-disturbing activities related to the Project, and as the Project proceeds adjusting personnel and schedule as needed to provide sufficient oversight. The developer, lead contractor, and all subcontractors shall routinely update the Native American monitor(s) and their scheduling representative(s) regarding scheduling for ground-disturbing activities, and changes to said schedule, such that there is sufficient advance notice that a Native American monitor can be scheduled accordingly.</p>	Construction	City of Redlands	LTS			
<p><b>TCR-3 Worker Environmental Awareness Program (WEAP)/Pre-Grade Meeting.</b> Prior to commencing construction activities and thus prior to any ground disturbance in the Proposed Project site, the Tribal Monitor(s) shall conduct initial WEAP training/pre-grade meeting for all construction personnel, including supervisors, present at the outset of the Project construction work phase, for which the lead contractor and all subcontractors shall make their personnel available. This WEAP training will educate construction personnel on how to work with the tribal monitor(s) to identify and minimize impacts to tribal cultural resources and maintain environmental compliance and be performed periodically for new personnel coming on to the Project as needed. The retained Consulting Tribe(s) representative(s) shall attend the WEAP meeting with the grading contractors to explain and coordinate the requirements of the monitoring plan.</p>	Pre-Construction	City of Redlands	LTS			

Mitigation Measure	Implementation Phase	Monitoring Agency	Level of Significance After Mitigation Less than Significant (LTS)	Verification of Compliance		
				Initial	Date	Remarks
<p><b>TCR-4 Inadvertent Discovery of Human Remains.</b> The Consulting Tribes request the following specific conditions to be imposed in order to protect any inadvertent discovery of Native American human remains and/or cremations. No photographs are to be taken except by the County Coroner, with written approval by the Consulting Tribe(s) if applicable.</p> <p>A. Should human remains and/or cremations be encountered on the surface or during any and all ground-disturbing activities (i.e., clearing, grubbing, tree and bush removal, grading, trenching, fence post placement and removal, construction excavation, excavation for all water supply, electrical, and irrigation lines, and landscaping phases of any kind), work in the immediate vicinity of the discovery shall immediately stop within a 100-foot perimeter of the discovery. The area shall be protected; project personnel/observers will be restricted. The County Coroner is to be contacted within 24 hours of discovery. The County Coroner has 48 hours to make his/her determination pursuant to State and Safety Code §7050.5. and PRC § 5097.98.</p> <p>B. In the event that the human remains and/or cremations are identified as Native American, the Coroner shall notify the NAHC within 24 hours of determination pursuant to subdivision (c) of HSC §7050.5.</p> <p>C. The NAHC shall immediately notify the person or persons it believes to be the MLD. The MLD has 48 hours, upon being granted access to the Project site, to inspect the site of discovery and make his/her recommendation for final treatment and disposition, with appropriate dignity, of the remains and all associated grave goods pursuant to PRC §5097.98.</p> <p>D. If any of the Consulting Tribes has been named the MLD, the Tribe may wish to rebury the human remains and/or cremation and sacred items in their place of discovery with no further disturbance where they will reside in perpetuity. The place(s) of reburial will not be disclosed by any party and is exempt from the California Public Records Act (California Government Code § 6254[r]). Reburial location of human remains and/or cremations will be determined by the Tribe's MLD, the landowner, and the City Planning Department.</p>	Pre-Construction/Construction	City of Redlands	LTS			

Mitigation Measure	Implementation Phase	Monitoring Agency	Level of Significance After Mitigation Less than Significant (LTS)	Verification of Compliance		
				Initial	Date	Remarks
<p><b>TCR-5 Pre-Grade Meeting.</b> A Native American monitor(s) selected by the tribe should be present at the Project kickoff meeting, be provided with a schedule of initial ground-disturbing activities and be on-site at the commencement of ground-disturbing activities related to the Project, and as the Project proceeds adjusting personnel and schedule as needed to provide sufficient oversight. The Consultant, lead contractor, and all subcontractors shall routinely update the Native American monitor and their scheduling representative(s) regarding scheduling for ground-disturbing activities, and changes to said schedule, such that there is sufficient advance notice that a Native American monitor can be scheduled accordingly.</p>	Pre-Construction	City of Redlands	LTS			
<p><b>TCR-6 Inadvertent Discovery of Tribal Cultural Resources and Treatment.</b> In the event that previously unidentified cultural resources are unearthed during construction, the Qualified Archaeologist and the Tribal Monitor shall have the authority to temporarily divert and/or temporarily halt ground-disturbance operations in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored grading can proceed.</p> <p>If a potentially significant cultural resource(s) is discovered, work shall stop within a 60-foot perimeter of the discovery and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. All work shall be diverted away from the vicinity of the find, so that the find can be evaluated by the Qualified Archaeologist and Tribal Monitor[s]. The Archaeologist shall notify the Lead Agency and consulting Tribe[s] of said discovery. The Qualified Archaeologist, in consultation with the Lead Agency, the consulting Tribe[s], and the Tribal Monitor, shall determine the significance of the discovered resource. A recommendation for the treatment and disposition of the Tribal Cultural Resource shall be made by the Qualified Archaeologist in consultation with the Tribe[s] and the Tribal Monitor[s] and be submitted to the Lead Agency for review and approval. Below are the possible treatments and dispositions of significant cultural resources in order of CEQA preference:</p> <p>A. Full avoidance</p> <p>B. If avoidance is not feasible, Preservation in place.</p> <p>C. If Preservation in place is not feasible, all items shall be reburied in an area away from any future impacts and reside in a permanent conservation easement or Deed Restriction.</p> <p>D. If all other options are proven to be infeasible, data recovery through excavation and then curation in a Curation Facility that meets the Federal Curation Standards (CFR 79.1).</p>	Pre-Construction	City of Redlands	LTS			

Mitigation Measure	Implementation Phase	Monitoring Agency	Level of Significance After Mitigation Less than Significant (LTS)	Verification of Compliance		
				Initial	Date	Remarks
<p><b>TCR-7 Final Report.</b> The final report(s) created as a part of the project (AMTP, isolate records, site records, survey reports, testing reports, etc.) shall be submitted to the Lead Agency and Consulting Tribe(s) for review and comment, to the extent permitted by law. After approval of all parties, the final reports are to be submitted to the local repository (Eastern Information Center or SCCIC), as well as providing follow-up reports of any finds to the Eastern Information Center or SCCIC, as required, and the Consulting Tribe(s) if authorized by law.</p>	Construction	City of Redlands	LTS			



## SECTION 6.0 – REFERENCES

The following is a list of references used in the preparation of this document.

Bell, Alyssa

2023 Paleontological Records Search. Natural History Museum of Los Angeles County (NHMLA).

California Department of Forestry and Fire Protection (CAL FIRE)

2023 Fire Hazard Severity Zone Viewer. Available online at:  
<https://egis.fire.ca.gov/FHSZ/>

2023 Aboveground Petroleum Storage Act. Accessed December 19, 2023 at:  
<https://osfm.fire.ca.gov/what-we-do/pipeline-safety-and-cupa/certified-unified-program-agency/aboveground-petroleum-storage-act>

California Department of Transportation (Caltrans)

2020 List of eligible and officially designated State Scenic Highways. Accessed November 3, 2023 at: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>

California Energy Commission (CEC)

2024 Energy Reports. Accessed January 2024. <https://ecdns.energy.ca.gov/elecbycounty.aspx>

California Department of Conservation (DOC)

1986 Mineral Land Classification Of the Greater Los Angeles Area Part VII.

2022a California Important Farmland Finder. Accessed October 2023. Available online at:  
<https://maps.conservation.ca.gov/DLRP/CIFF/>

2023 Earthquake Zones of Required Investigation. Accessed November 2023.  
<https://maps.conservation.ca.gov/cgs/eqzapp/app/>

CalRecycle

2006 Commercial Sector Generation Rates. Accessed December 11, 2023.  
<https://www2.calrecycle.ca.gov/wastecharacterization/general/rates>

2023 Site Activity Detail- California Street Landfill. Accessed December 11, 2023.  
<https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1855?siteID=2637>

City of Redlands (City)

2002 Redlands Airport Compatibility Map. Available at: <https://redlandsairport.com/wp-content/uploads/Redlands-Airport-Compatibility-Map.pdf>

2006 Sector 8 Specific Plan (SP 59). Available at:  
[https://www.cityofredlands.org/sites/main/files/file-attachments/specific\\_plan\\_59.pdf?1599075965](https://www.cityofredlands.org/sites/main/files/file-attachments/specific_plan_59.pdf?1599075965)

- 2009 Architectural Guidelines. Accessed on November 6, 2023 at:  
[https://www.cityofredlands.org/sites/main/files/file-attachments/architectural\\_guidelines\\_cc\\_approved\\_12-1-09-1.pdf?1559681036](https://www.cityofredlands.org/sites/main/files/file-attachments/architectural_guidelines_cc_approved_12-1-09-1.pdf?1559681036)
- 2018 General Plan. Available at:  
<https://www.cityofredlands.org/post/planning-division-general-plan>
- 2021a Local Hazards Mitigation Plan. Available at:  
[https://www.cityofredlands.org/sites/main/files/file-attachments/final\\_city\\_of\\_redlands\\_lhmp\\_nov\\_2021.pdf?1643745390](https://www.cityofredlands.org/sites/main/files/file-attachments/final_city_of_redlands_lhmp_nov_2021.pdf?1643745390)
- 2021b City of Redland 2020 IRUWMP Part 2, Chapter 4 Redlands 2020 UWMP. Available at:  
[https://www.cityofredlands.org/sites/main/files/file-attachments/part\\_2\\_chapter\\_4\\_redlands\\_2020\\_uwmp.pdf?1622145365](https://www.cityofredlands.org/sites/main/files/file-attachments/part_2_chapter_4_redlands_2020_uwmp.pdf?1622145365)
- 2022a Zoning Map. Available online at: <https://www.cityofredlands.org/sites/main/files/file-attachments/zoning.pdf?1670528707>
- 2022b Redlands General Plan Land Use Map Available at:  
<https://www.cityofredlands.org/sites/main/files/file-attachments/generalplan2035.pdf?1670275943>
- 2023 City of Redlands Strategic Plan FY 22-23 Through FY 27-28 accessed December 11, 2023 Available online at: [https://www.cityofredlands.org/sites/main/files/file-attachments/redlandsstrategicplan\\_final.pdf?1651172526](https://www.cityofredlands.org/sites/main/files/file-attachments/redlandsstrategicplan_final.pdf?1651172526)
- 2024 Planning Division Major Project List 2024. Available online at:  
[https://www.cityofredlands.org/sites/main/files/file-attachments/major\\_projects\\_list\\_3q\\_2023\\_-\\_9.2023.pdf](https://www.cityofredlands.org/sites/main/files/file-attachments/major_projects_list_3q_2023_-_9.2023.pdf)

#### County of San Bernardino (County)

- 2018 San Bernardino County Emergency Operations Plan (EOP). Available online at:  
[https://www.sbcounty.gov/uploads/SBCFire/documents/OES/2018\\_EOP\\_Update.pdf](https://www.sbcounty.gov/uploads/SBCFire/documents/OES/2018_EOP_Update.pdf)
- 2020 Policy Map HZ-2 Liquefaction & Landslide Hazards. Accessed November 2, 2023 at:  
<https://countywideplan.com/wp-content/uploads/sites/68/2021/02/HZ-2-Liquefaction-Landslide-Hazards-Valley-Mountain-201027.pdf?x23421>
- 2021 Parcels under Open Space contract report. Accessed October 2023. Available at:  
<https://securereservercdn.net/192.169.221.188/787.15f.myftpupload.com/wp-content/uploads/2021/07/NPP874-WilliamsonActParcels.pdf>

#### Department of Toxic Substances Control (DTSC)

- 2023 Envirostor Database. Accessed October 2023.  
<https://www.envirostor.dtsc.ca.gov/public/>

#### Federal Emergency Management Agency (FEMA)

- 2020 Flood Zones. Accessed on November 14, 2023 at: <https://www.fema.gov/glossary/flood-zones>

#### Google

- 2023 Google Earth Pro. Available at: <https://earth.google.com/web/>.

Regional Water Quality Control Board (RWQCB)

2020 Chapter 5 Implementation - Santa Ana River Basin Plan. Accessed on November 15, 2023 at:  
[https://www.waterboards.ca.gov/santaana/water\\_issues/programs/basin\\_plan/docs/2019/New/Chapter\\_5\\_June\\_2019.pdf](https://www.waterboards.ca.gov/santaana/water_issues/programs/basin_plan/docs/2019/New/Chapter_5_June_2019.pdf)

San Bernardino County Fire Protection District (CUPA)

2023 Hazardous Materials Business Plan (HMBP). Accessed on December 19, 2023 at:  
<https://sbcfire.org/hazmatbusinessplan/>

State Water Resources Control Board (SWRCB)

2023 GeoTracker Database. Accessed October 2023. <https://geotracker.waterboards.ca.gov/>

United States Department of Agriculture (USDA)

2023 Web Soil Survey. Accessed November 2, 2023 at:  
<https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>