

Mitigation Measure	Implementation Phase	Monitoring Agency	Level of Significance After Mitigation Less than Significant (LTS)	Verification of Compliance		
				Initial	Date	Remarks
BIOLOGICAL RESOURCES						
BIO-1: Preconstruction Survey 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			
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 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			

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CULTURAL RESOURCES						
CUL-1 Retain Cultural Resource Consultant. 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			
CUL-2 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			

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<p>CUL-3 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"> 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. 	Pre-Construction/Construction	Project Proponent, City of Redlands	LTS			
<p>CUL-4 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>CUL-5 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			

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GEOLOGY and SOILS						
<p>GEO-1: Excavate Loose Soil 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.</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>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.</p>	Pre- Construction/Construction	Project Proponent, City of Redlands	LTS			

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<p>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</p>	Construction/Post-Construction	Project Proponent, City of Redlands	LTS			
HAZARDS AND HAZARDOUS MATERIALS						
<p>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:</p> <ul style="list-style-type: none"> ▪ 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. <p>The UCDP shall be effective during all ground disturbing activities of the Project.</p>	Pre-Construction	Project Proponent, City of Redlands	LTS			

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<p>HAZ-2 Initial Response to Unanticipated Soil Contamination. During excavation, indicators of possible contamination include, but are not limited to:</p> <ul style="list-style-type: none"> ▪ 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. <p>Immediately following discovery of potentially hazardous waste or contaminants, the Contractor will:</p> <ul style="list-style-type: none"> ▪ 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. 	Construction	Project Proponent, City of Redlands	LTS			

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<p>TRIBAL CULTURAL RESOURCES</p> <p>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.</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			

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<p>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.</p>	Construction	City of Redlands	LTS			
<p>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.</p>	Pre-Construction	City of Redlands	LTS			

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<p>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.</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 reburial 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			

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<p>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.</p>	Pre-Construction	City of Redlands	LTS			
<p>TCR-6 Inadvertent Discovery of Tribal Cultural Resources and Treatment. 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			

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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.	Construction	City of Redlands	LTS			