Tennessee Village Mixed-Use Project

Initial Study
and
Mitigated Negative Declaration

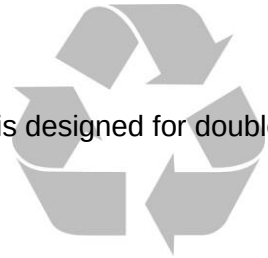
Lead Agency:

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

Prepared by:

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

Public Review Draft
April 22, 2024



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1 Introduction

The city of Redlands ("Lead Agency") received a development proposal from Diversified Pacific Development Group, LLC ("applicant") for a mixed-use development on a 13.48-acre site located to the northwest of the intersection of Tennessee Street and Lugonia Avenue in the city of Redlands, California. The development proposal and associated land use applications constitute a *project* that is subject to review under the California Environmental Quality Act (CEQA) 1970 (Public Resources Code §§ 21000, *et seq.*), and the CEQA Guidelines (14 California Code of Regulations §§ 15000, *et. seq*.).

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

- A description of the project, including the location of the project (See Section 2);
- Identification of the environmental setting (See Section 2.10);
- Identification of environmental effects by the use of a checklist, matrix, or other methods, provided that entries on the checklist or other form are briefly explained to indicate that there is some evidence to support the entries (See Section 4);
- Examination of whether the project is compatible with existing zoning, plans, and other applicable land use controls (See Section 4.13);
- Discussion of ways to mitigate significant effects identified, if any (See Section 5); and,
- The name(s) of the person(s) who prepared or participated in the preparation of the Initial Study (See Section 6).

1.1 – Purpose of CEQA

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

The Legislature finds and declares as follows:

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

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

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

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

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

1.2 – Public Comments

Comments from all agencies and individuals are invited prior to the closing date of the public review period regarding the information contained in this Initial Study and Mitigated Negative Declaration. Such comments should explain any perceived deficiencies in the assessment of impacts in the Initial Study. Please submit comments to the contact listed below:

Sean Reilly, Principal Planner
City of Redlands
35 Cajon St., Ste. 20
Redlands, CA 92373
Office 909.798.7555 ext. 7308
Email: sreilly@cityofredlands.org

Following a 30-day period of circulation and review of the Initial Study and Mitigated Negative Declaration, all comments will be considered by the city of Redlands prior to adoption.

1.3 – Availability of Materials

All materials related to the preparation of this Initial Study are available for public review. To request an appointment to review these materials, please contact Sean Reilly, Principal Planner, via telephone at (909) 798-7555 ext. 7344, or via email at sreilly@cityofredlands.org. The Initial Study and Mitigated Negative Declaration are also made available online at the city of Redlands website.

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2 Project Description

2.1 – Project Title

Tennessee Village Mixed-Use Project

2.2 – Lead Agency Name and Address

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

2.3 – Contact Person and Phone Number

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

2.4 – Project Location

The city of Redlands is located in southwest San Bernardino County adjacent to the San Bernardino/Riverside County line, (see Exhibit 1, Regional Context Map). The project site is comprised of a single undeveloped, 13.48-acre parcel located to the northeast of the intersection of Tennessee Street and Lugonia Avenue in the City of Redlands, California (see Exhibit 2, Project Vicinity Map). The site is located approximately 0.5 miles north of Interstate 10 (I-10) and is located immediately east of Interstate 210 (I-210). The site is located approximately 3.4 miles southwest of Redlands Municipal Airport. The project site is bound by I-210 to the west and undeveloped land to the north, east, and south.

- Latitude 34° 04’ 21.19” North, Longitude 117° 11’ 54.80” West
- APN# 0167-171-015

2.5 – Project Sponsor’s Name and Address

Diversified Pacific Development Group, LLC
10621 Civic Center Drive
Rancho Cucamonga, California 91730

2.6 – General Plan Land Use Designation

The project site has a General Plan land use designation of Commercial. Sites with this designation may be developed with a stand-alone commercial use, two or more commercial uses, or mixed uses. The Commercial land use category may permit residential and mixed uses consistent with the underlying zoning district.

2.7 – Zoning District

The current zoning designation of the project site is EV/SD (East Valley Corridor Specific Plan/Special Development). A Zone Change from (East Valley Corridor Specific Plan/Special Development) to C-3 (General Commercial District) is proposed as part of the project. The C-3 District allows for both non-residential and residential uses combined as mixed-use development subject to approval of a Conditional Use Permit (CPU).

2.8 – Project Description

The proposed project includes Tentative Parcel Map No. 20688, which would include development of 460 new apartment units, approximately 17,899 square feet of commercial space, and associated landscaping and roadway improvements (see Exhibit 3, TPM No. 20688). The project would consist of two (2) three-story buildings and eight (8) four-story buildings (see Exhibit 4, Conceptual Site Plan). Eight (8) of the proposed buildings would include only residential uses and two (2) of the proposed buildings would include mixed-uses that incorporate ground-floor commercial space with residential units on the floors above (see Exhibit 5, Project Elevations). The residential apartment units would range in size from one-bedroom to three-bedroom units (see Exhibit 6, Floor Plans). The project would include six (6) “Live/Work” units that incorporate retail/office uses on the ground floor and a residential unit on the second floor. In addition, approximately 5% of the proposed residential units would be designated as “very low-income” units, which would allow for a 20 percent density bonus in accordance with the “California Density Bonus Law”. The very low-income units would be spread throughout the site to create a cohesive project that does not separate the market rate units from the very low-income units.

Parking would be provided through a combination of underground, garage, outdoor-covered, outdoor-uncovered, and commercial parking spaces throughout the project. The project would include 673 residential parking spaces, and 91 commercial spaces, for a total of 764 spaces. Residential parking would be regulated by security gates and would be separate from the commercial parking spaces. The parking and street immediately surrounding building ten would be publicly accessible and would be designed to connect to a future commercial development proposed to the south. There are three points of entry into the project: one entry point off Tennessee Street, one entry point off Pennsylvania Avenue, and one entry point at the future commercial development proposed to the south.

The project would include approximately 190,098 square feet of common and private open space. Outdoor and open space amenities would include a linear park leading to a resort-style pool in the center of the site along with other smaller open space areas throughout the site. Finally, Building 9 would house leasing offices, mail rooms, and other amenities that may include office/meeting spaces, kitchens, a movie theater, and a rooftop bar. The remainder of the site would be paved, including sidewalks, streets, driveways, and landscaping planters.

Additional components of the project include: Specific Plan Amendment (SPA) to remove the site from East Valley Corridor Specific Plan; Zone Change (ZC) to establish C-3 (General Commercial District) zoning for the site, Conditional Use Permit (CUP) for the mixed use portion of the project; and Tentative Parcel Map to subdivide the property into four lots.

Project construction is anticipated to begin in the summer of 2024 and last approximately 19 months, based on default assumptions generated by the California Emissions Estimator Model (CalEEMod) (see Appendix A). Based on the preliminary estimates, grading for the project would require cut of approximately 23,076 cubic yards (cy), and fill of 40,489 cy, requiring approximately 17,413 cubic yards of soil import during grading. The project is anticipated to be operational by the spring of 2026.

2.9 – Surrounding Land Uses

Surrounding land uses are summarized in Table 2 (Surrounding Land Uses), below.

Table 1
Surrounding Land Uses

Direction	General Plan Designation	Zoning District	Existing Land Use
Project Site	Commercial	EV/SD (East Valley Corridor Specific Plan/Special Development)	Undeveloped Land
North	Commercial	Concept Plan No. 4	Undeveloped Land
South	Commercial	EV/SD (East Valley Corridor Specific Plan/Special Development)	Undeveloped Land
East	High Density Residential	Multiple Family Residential (R-3)	Undeveloped Land
West	Public Facilities	Public Facilities	Interstate 210

2.10 – Environmental Setting

The project site is located on an approximately 13.48-acre, undeveloped parcel of land covered in native and non-native shrubs and trees in a mostly developed portion of the City of Redlands, California. The site is located northeast of the intersection of Tennessee Street and Lugonia Avenue, in an area of the city characterized by residential, commercial, and light industrial land uses as well as undeveloped land. The project site is flat, with an elevation ranging from approximately 1,275 to 1,291 feet above mean sea level (AMSL). . Undeveloped land is located to the north, east, and south of the project site. To the west of the project site is Interstate 210. There are multiple schools and parks located within 2 miles of the project site.

2.11 – Required Approvals

The project will require the following city of Redlands Development Plan and Legislative applications:

- Specific Plan Amendment to remove the project from the East Valley Corridor Specific Plan
- Zone Change to establish the project site's zoning as C-3 (General Commercial)
- Socio-Economic Cost Benefit Analysis
- Tentative Parcel Map No. 20688
- Conditional Use Permit for a mixed-use project within the C-3 zoning district
- Planning Commission (City Council) Review and Approval for site plan and architectural review
- Compliance with the requirements of CEQA
- Density Bonus Housing Agreement
- Grading Permits and Encroachment Permits
- Building Permits*

2.12 – Other Public Agency Whose Approval is Required

- None

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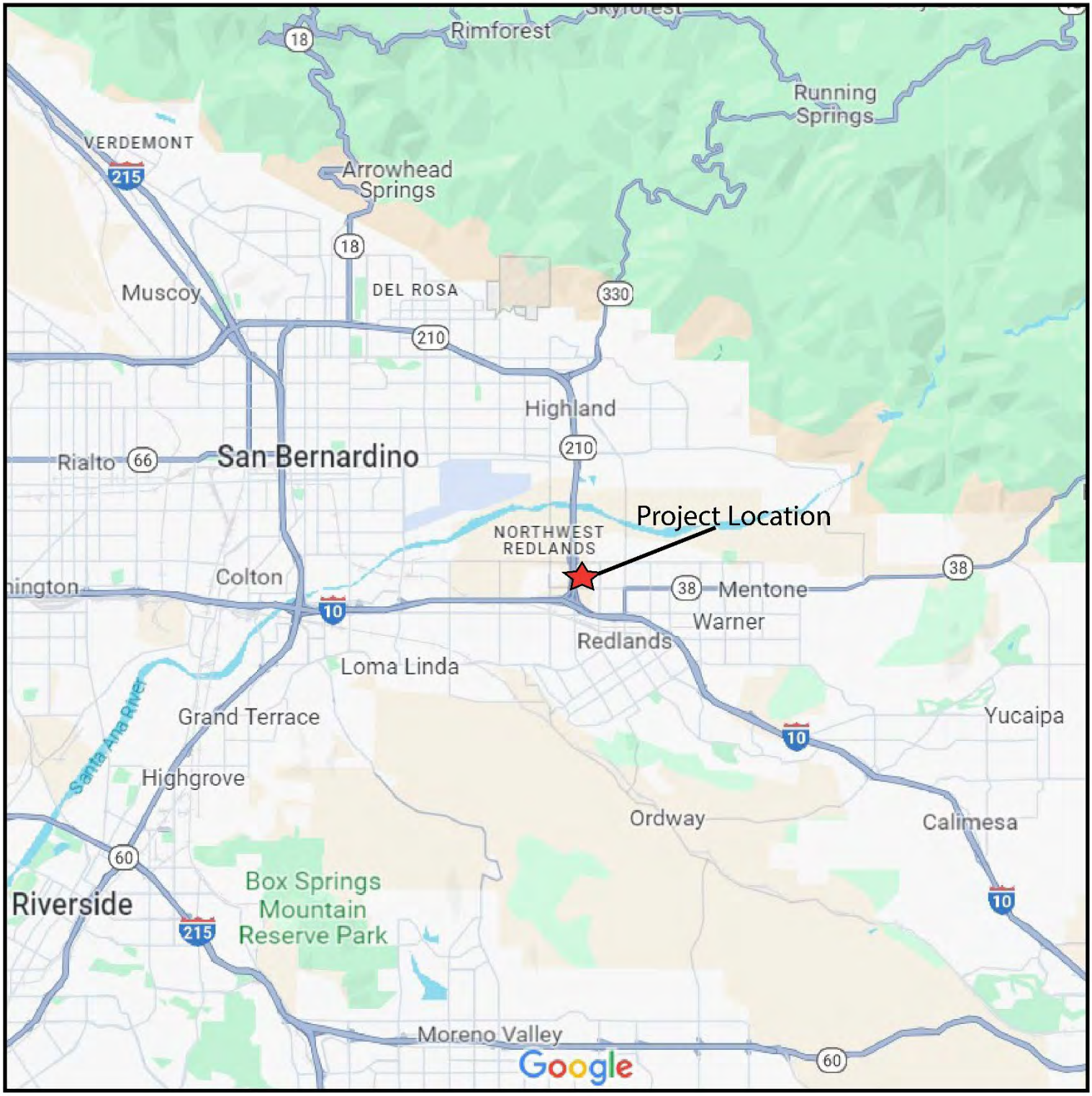

Not to Scale

Source: Google Maps

http://www.migcom.com • 951-787-9222

Exhibit 1 Regional Context Map

Tennessee Village Mixed-Use Project
Redlands, California

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- Project Site

Not to Scale

Source: Google Maps

http://www.migcom.com • 951-787-9222

Exhibit 2 Project Vicinity Map

Tennessee Village Mixed-Use Project
Redlands, California

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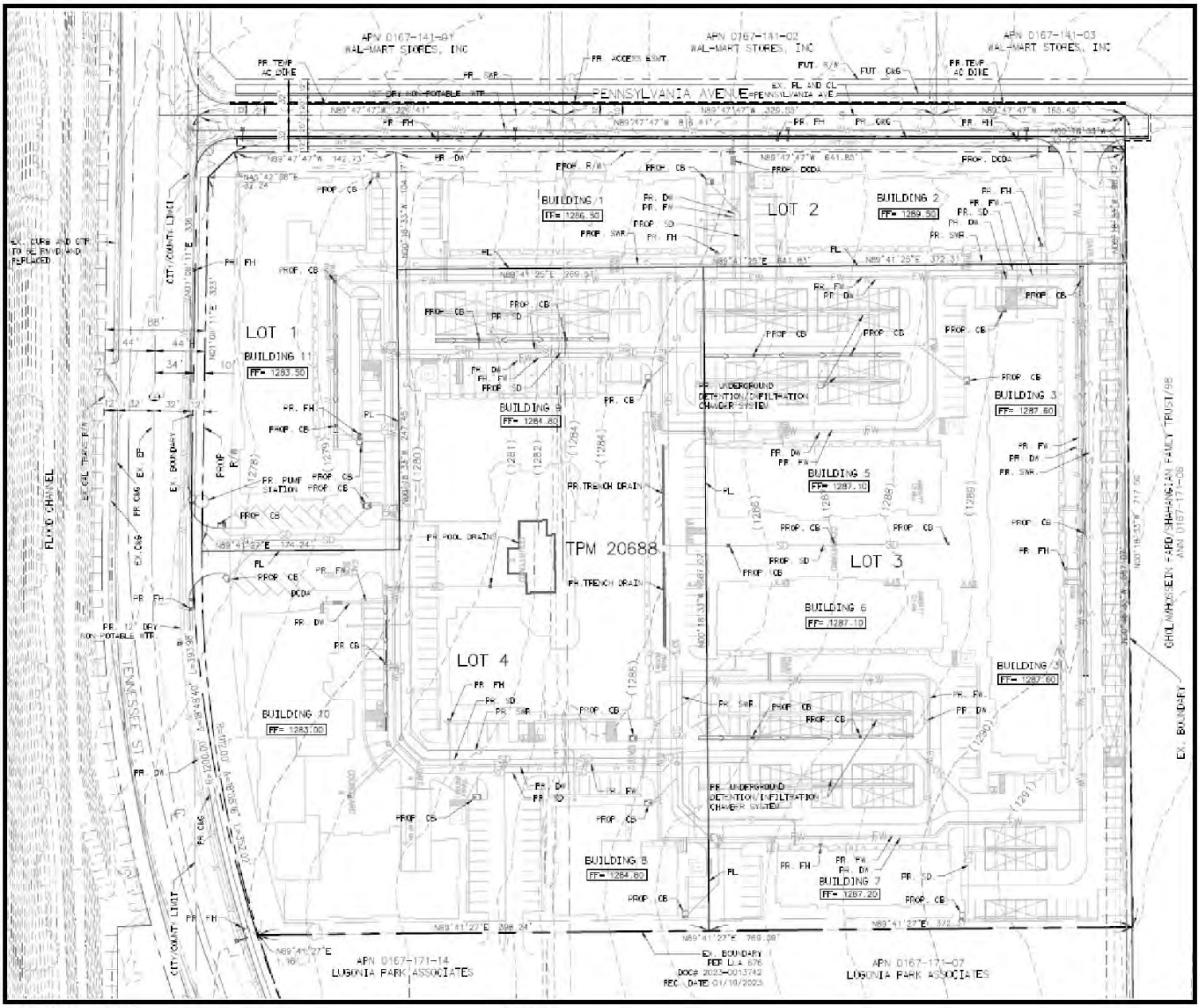

GENERAL NOTES

1. ASSESSOR'S PARCEL NUMBERS: PORTION OF 0167-171-007,014
2. EXISTING ZONING DESIGNATION: EV/SD (EAST VALLEY/SPECIAL DEVELOPMENT)
3. PROPOSED ZONING DESIGNATION: COMMERCIAL C-3
4. EXISTING GENERAL PLAN DESIGNATION: COMMERCIAL
5. PROPOSED GENERAL PLAN DESIGNATION: COMMERCIAL
6. EXISTING USE: VACANT LAND
7. PROPOSED USE: MIXED USE; COMMERCIAL AND MULTI-FAMILY
8. NO REGULATED TREES OR PLANTS KNOWN TO EXIST ON-SITE.
9. NO ADJACENT STRUCTURES WITHIN 15' OF PROJECT PROPERTY LINE, UNLESS OTHERWISE SHOWN.
10. THE PROJECT AREA IS DETERMINED TO BE OUTSIDE THE 0.2% ANNUAL CHANCE FLOODPLAIN. (FIRM # 06071C8704H)
11. PROJECT GROSS AREA: 587,128 SF (13.48 AC)
12. PROJECT NET AREA: 555,661 SF (12.76 AC) (SEE PROJECT AREA TABLE BELOW)
13. PROPOSED NUMBER OF LOTS: 4
14. SEE PRELIMINARY DRAINAGE STUDY TRIBUTARY MAP FOR DRAINAGE AREAS.

ABBREVIATIONS

APN	ASSESSOR PARCEL NUMBER	ℙ	PROPERTY LINE
CB	CATCH BASIN	PROP.	PROPOSED
℄	CENTERLINE	GB	GRADE BREAK
DW	DOMESTIC WATER	HP	HIGH POINT
DWY.	DRIVEWAY	R/W	RIGHT OF WAY
ELEV.	ELEVATION	REF	REFERENCE
EG	EXISTING GRADE	SD	STORM DRAIN
EX.	EXISTING	SWR	SEWER
FG	FINISHED GRADE	S/W	SIDEWALK
FW	FIRE WATER	TC	TOP OF CURB
FL	FLOWLINE	TF	TOP OF FOOTING
HP	HIGH POINT	TG	TOP OF GRATE
INV.	INVERT	TW	TOP OF WALL
MIN.	MINIMUM	TRW	TOP OF RETAINING WALL
MAX.	MAXIMUM	W/	WITH
NG	NATURAL GROUND		

LEGEND

RIGHT-OF-WAY LINE
LOT/PARCEL LINE
STREET CENTERLINE
BOUNDARY LINE
ORIGINAL LOT/PARCEL LINE
PUBLIC ACCESS EASEMENT
1 FOOT CONTOUR INTERVAL
5 FOOT CONTOUR INTERVAL
NO VEHICULAR ACCESS
UTILITY MH
STREET LIGHT
VEGETATION

	SF	ACRES
LOT 1	59,558	1.37
LOT 2	65,014	1.49
LOT 3	218,575	5.02
LOT 4	212,514	4.88
SUB-TOTAL (NET AREA)	**555,661**	**12.76**
ADDITIONAL TENNESSEE ST. R/W	6,429	0.15
ADDITIONAL PENNSYLVANIA AVE. R/W	25,038	0.57
SUB-TOTAL	**31,467**	**0.72**
Totals	**587,128**	**13.48**

Exhibit 3 Tentative Parcel Map

Tennessee Village Mixed-Use Project
Redlands, California

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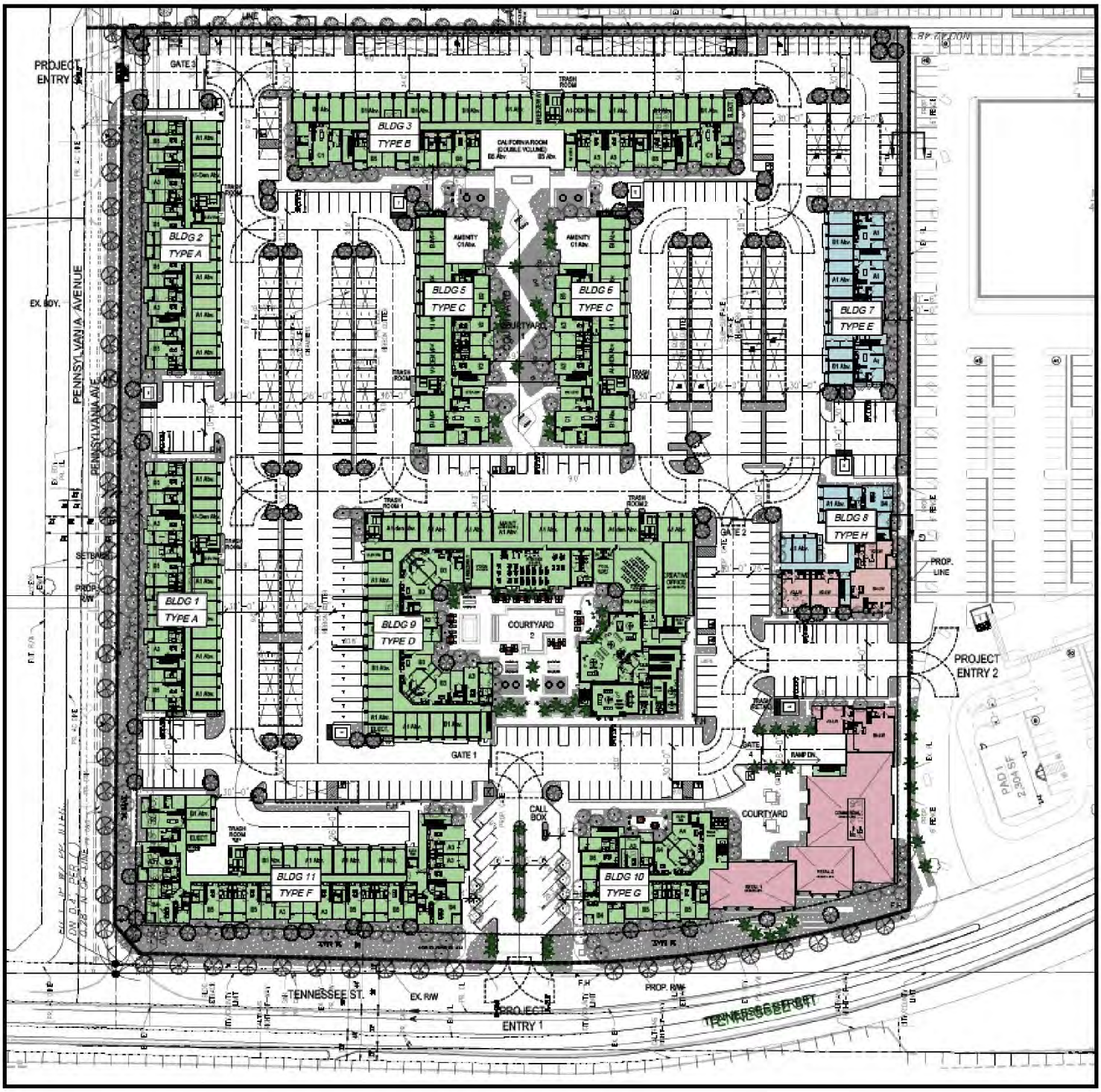


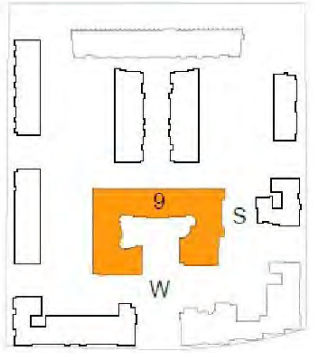
Exhibit 4 Conceptual Site Plan

Tennessee Village Mixed-Use Project
Redlands, California

EXTERIOR ELEVATION KEYNOTES

1. STUCCO
2. BRICK VENEER
3. VINYL WINDOW
4. SHADE CANOPY
5. GARAGE DOOR
6. VENEER STONE
7. PORCELAIN TILE
8. BALCONY RAILING
9. SUN SHADE LOUVER
10. STORE FRONT SYSTEM
11. EXTERIOR LIGHTING
12. JULIET BALCONY RAILING
13. METAL AWNING

SOUTH ELEVATION



WEST ELEVATION

Exhibit 5a - Project Elevations - Type D Building 9

Tennessee Village Mixed-Use Project
Redlands, California

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EXTERIOR ELEVATION KEYNOTES

1. STUCCO
2. BRICK VENEER
3. VINYL WINDOW
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6. VENEER STONE
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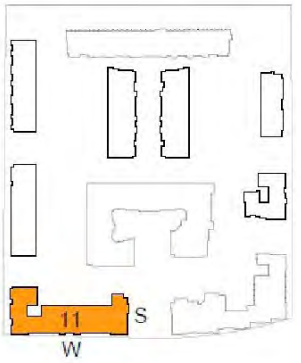
10. STORE FRONT SYSTEM
11. EXTERIOR LIGHTING
12. JULIET BALCONY RAILING
13. METAL AWNING

SOUTH ELEVATION



WEST ELEVATION

Exhibit 5b - Project Elevations - Type F Building 11

Tennessee Village Mixed-Use Project
Redlands, California

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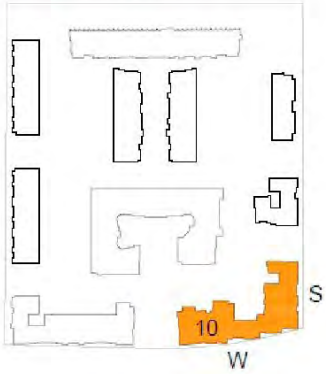
EXTERIOR ELEVATION KEYNOTES

1. STUCCO
2. BRICK VENEER
3. VINYL WINDOW
4. SHADE CANOPY
5. GARAGE DOOR
6. VENEER STONE
7. PORCELAIN TILE
8. BALCONY RAILING
9. SUN SHADE LOUVER
10. STORE FRONT SYSTEM
11. EXTERIOR LIGHTING
12. JULIET BALCONY RAILING
13. METAL AWNING

SOUTH ELEVATION



WEST ELEVATION

Exhibit 5c - Project Elevations - Type G Building 10

Tennessee Village Mixed-Use Project
Redlands, California

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EXTERIOR ELEVATION KEYNOTES

1. STUCCO
2. BRICK VENEER
3. VINYL WINDOW
4. SHADE CANOPY
5. GARAGE DOOR
6. VENEER STONE
7. PORCELAIN TILE
8. BALCONY RAILING
9. SUN SHADE LOUVER
10. STORE FRONT SYSTEM
11. EXTERIOR LIGHTING
12. JULIET BALCONY RAILING
13. METAL AWNING

WEST ELEVATION

SOUTH ELEVATION

EAST ELEVATION

NORTH ELEVATION

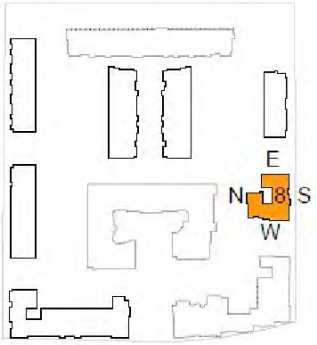

Exhibit 5d - Project Elevations - Type H Building 8

Tennessee Village Mixed-Use Project
Redlands, California

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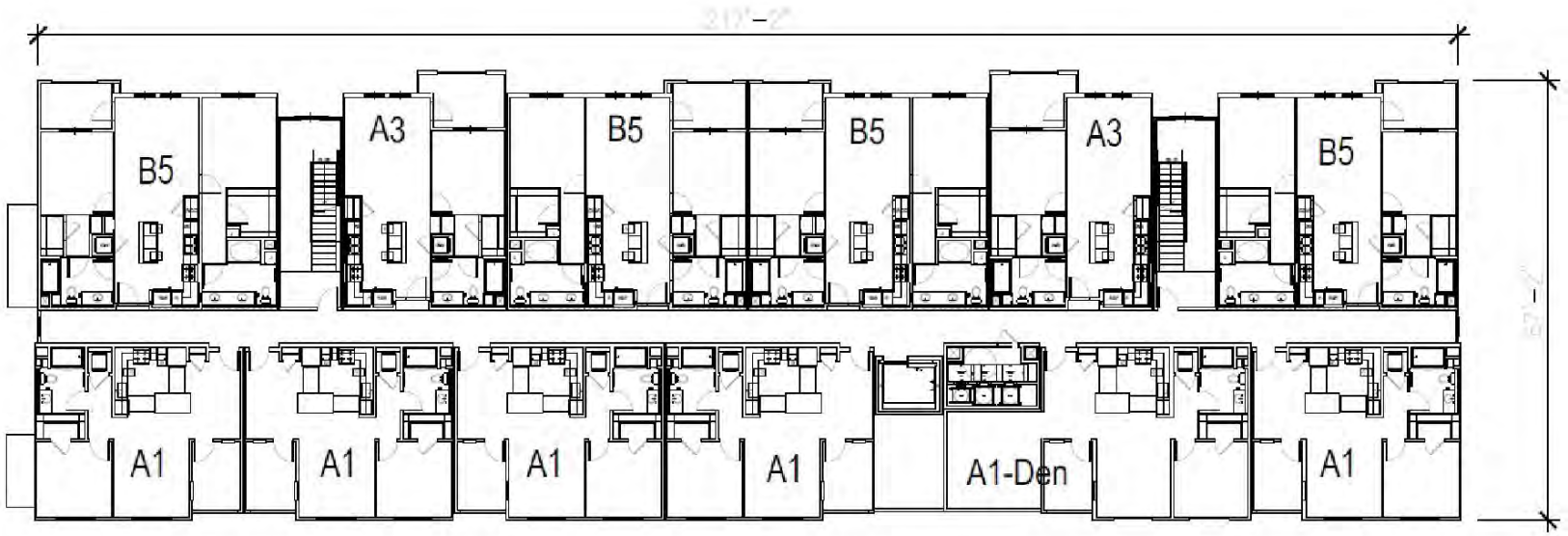
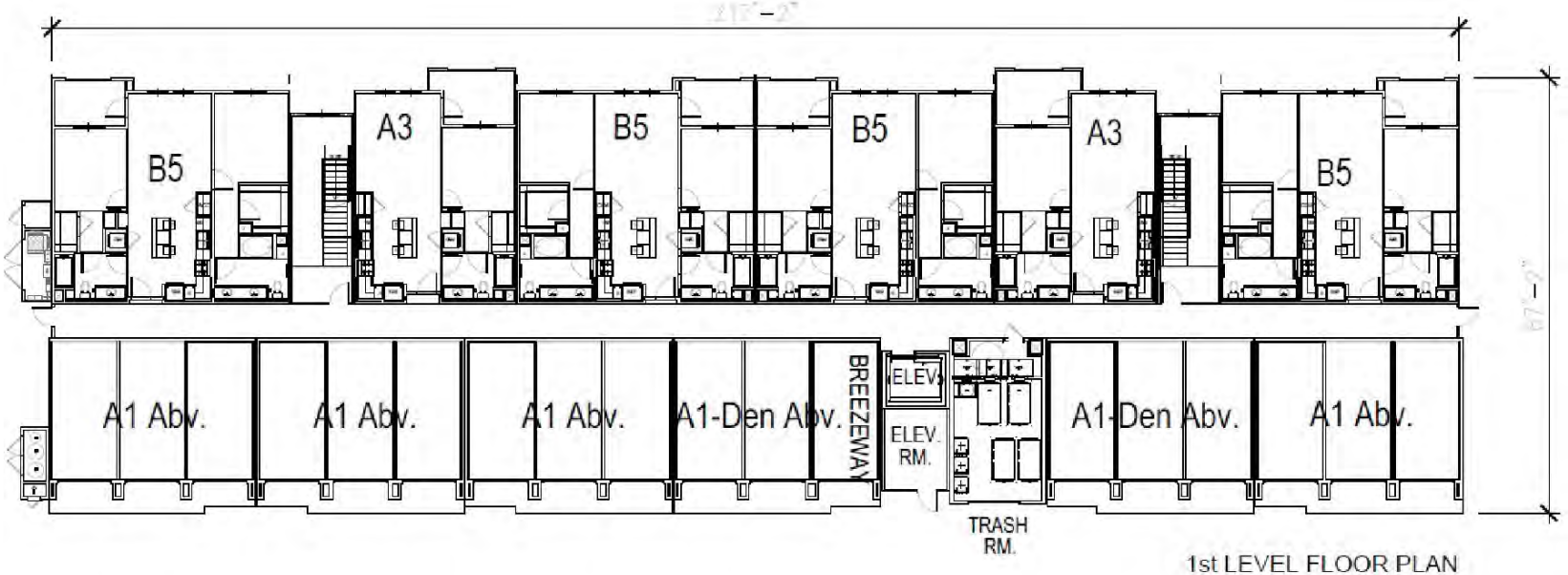


2nd - 4th LEVEL FLOOR PLAN



1st LEVEL FLOOR PLAN

Exhibit 6a - Type A Buildings 1 & 2 Floor Plans

Tennessee Village Mixed-Use Project
Redlands, California

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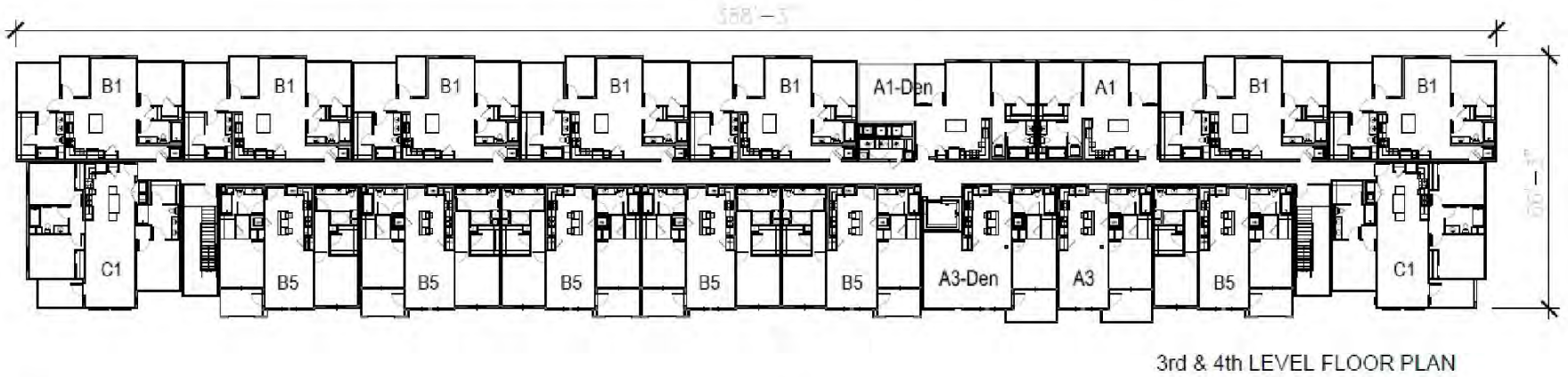

3rd & 4th LEVEL FLOOR PLAN

2nd LEVEL FLOOR PLAN

1st LEVEL FLOOR PLAN

Exhibit 6b - Type B Building 3 Floor Plan

Tennessee Village Mixed-Use Project

Redlands, California

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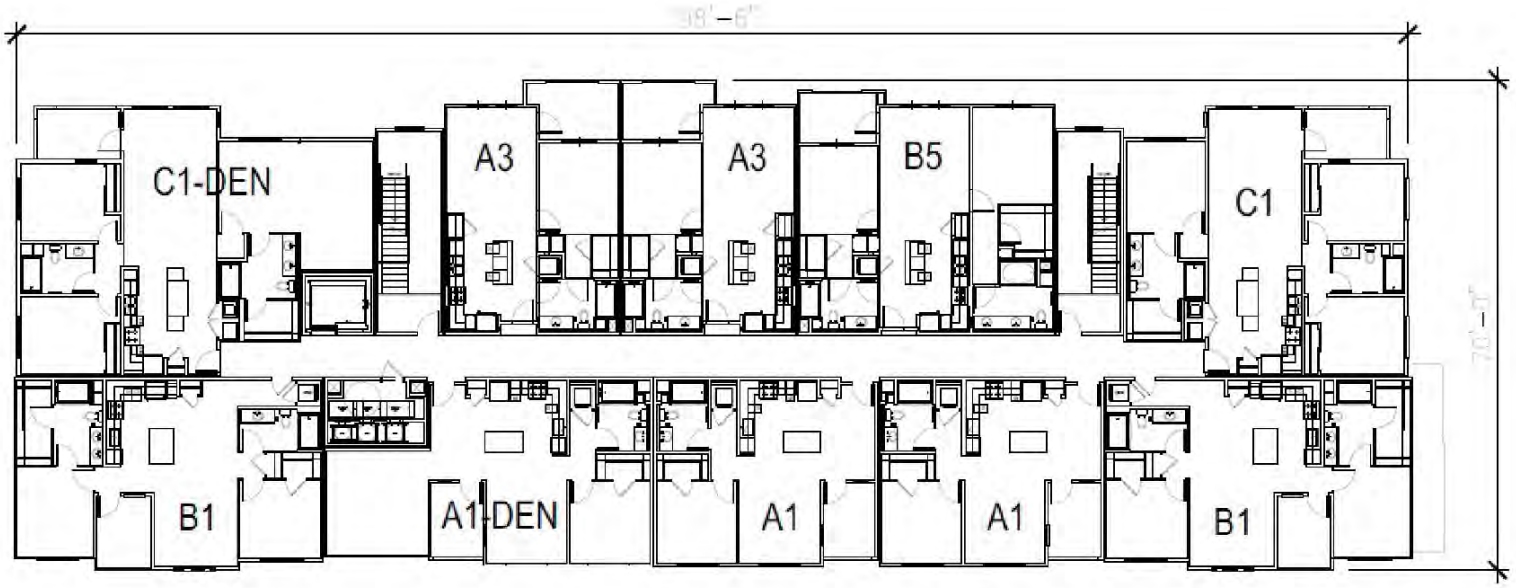
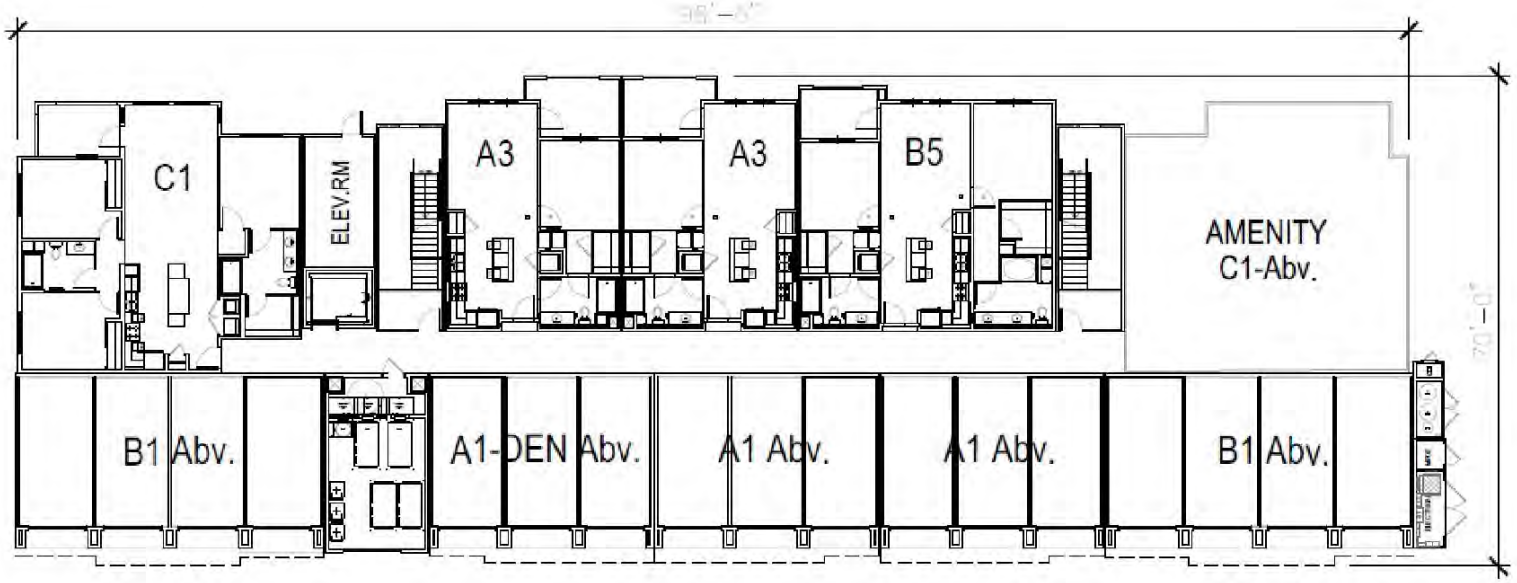


BLDG.5 & 6, 2nd - 4th LEVEL FLOOR PLAN



BLDG. 5 & 6,1st LEVEL FLOOR PLAN

Exhibit 6c - Type C Buildings 5 & 6 Floor Plans

Tennessee Village Mixed-Use Project
Redlands, California

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Exhibit 6d - Type D Building 9 - 1st Floor Plan

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Redlands, California

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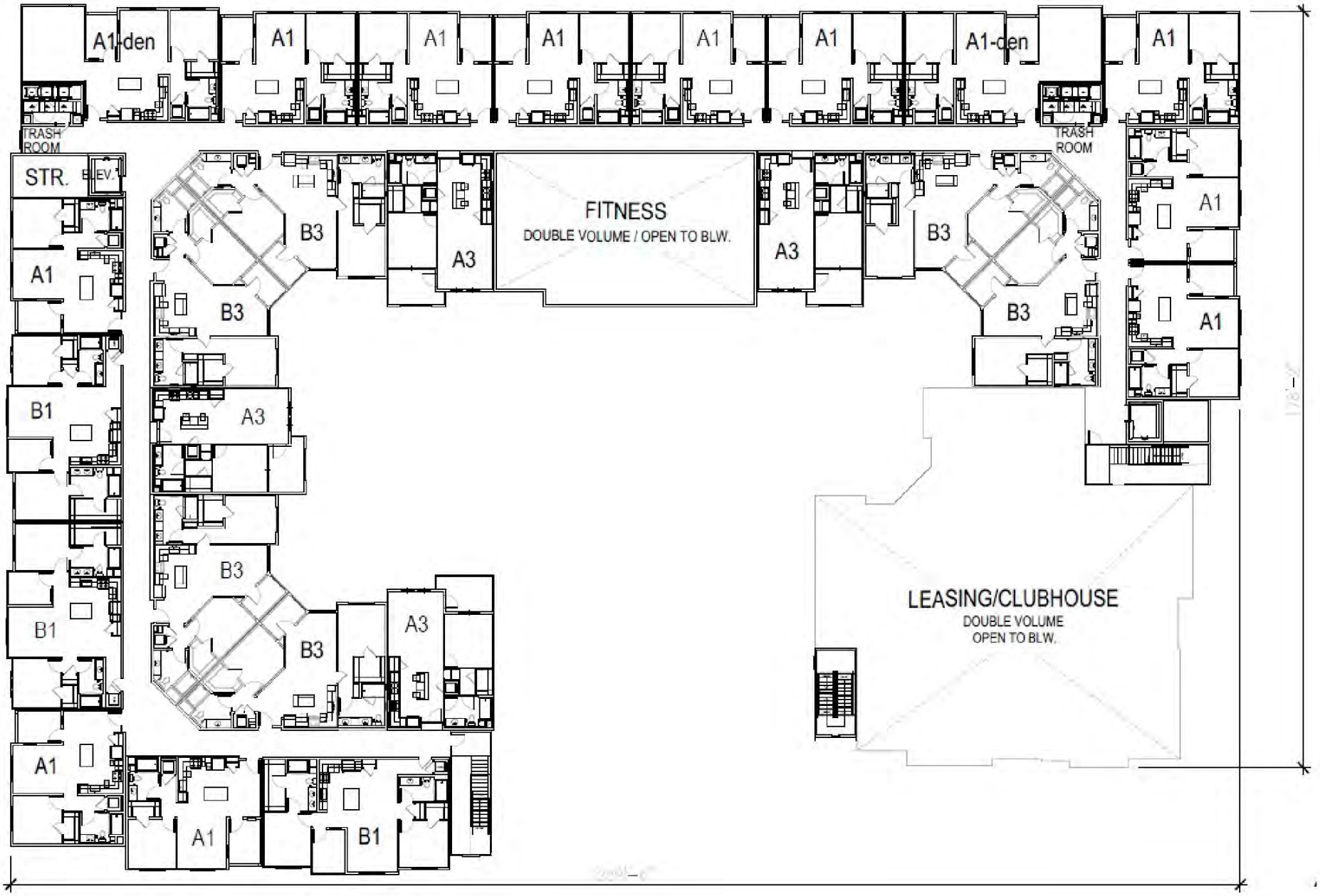

Exhibit 6e - Type D Building 9 - 2nd Floor Plan

Tennessee Village Mixed-Use Project
Redlands, California

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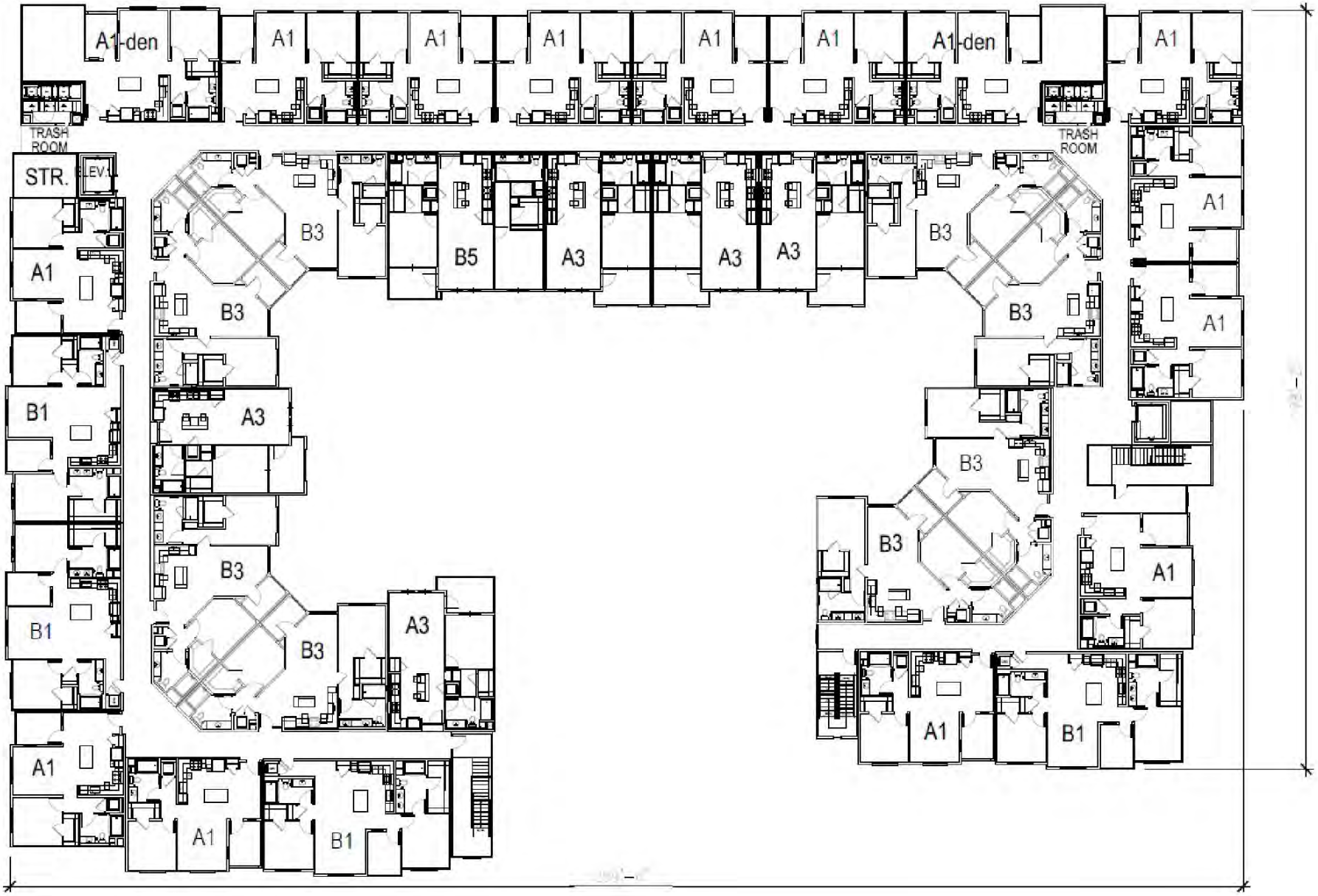

Exhibit 6f - Type D Building 9 - 3rd Floor Plan

Tennessee Village Mixed-Use Project
Redlands, California

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Exhibit 6g - Type D Building 9 - 4th Floor Plan

Tennessee Village Mixed-Use Project
Redlands, California

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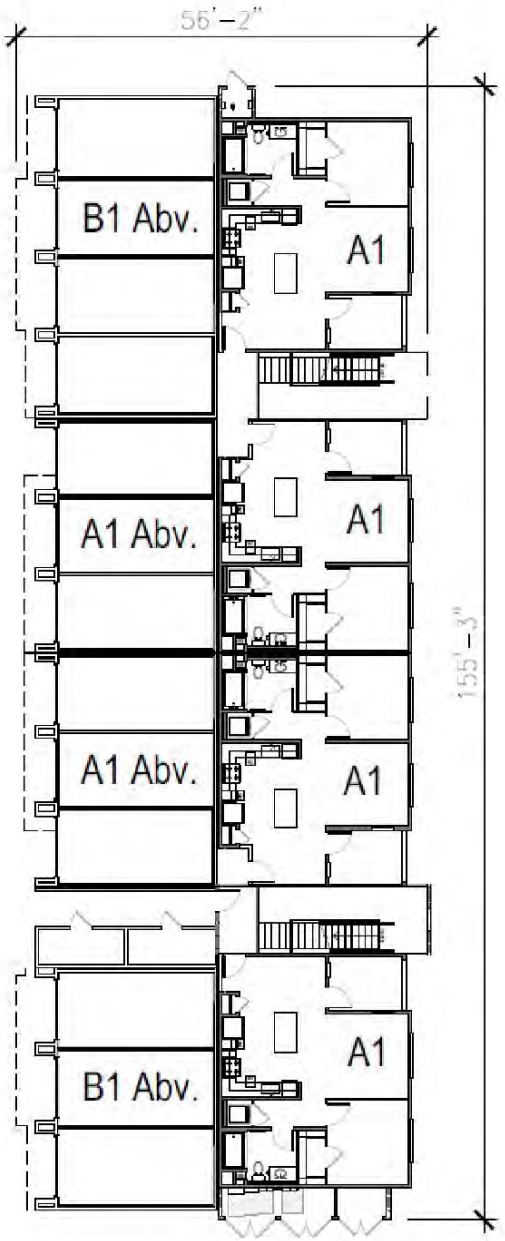
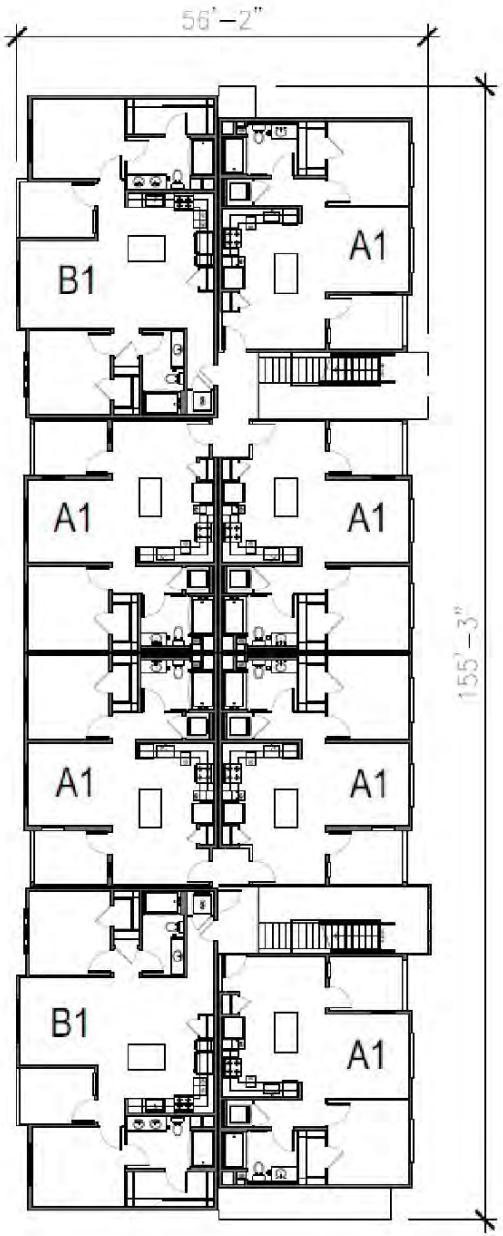


1st LEVEL FLOOR PLAN



2nd - 3rd LEVEL FLOOR PLAN

Exhibit 6h - Type E Building 7 - Floor Plan

Tennessee Village Mixed-Use Project
Redlands, California

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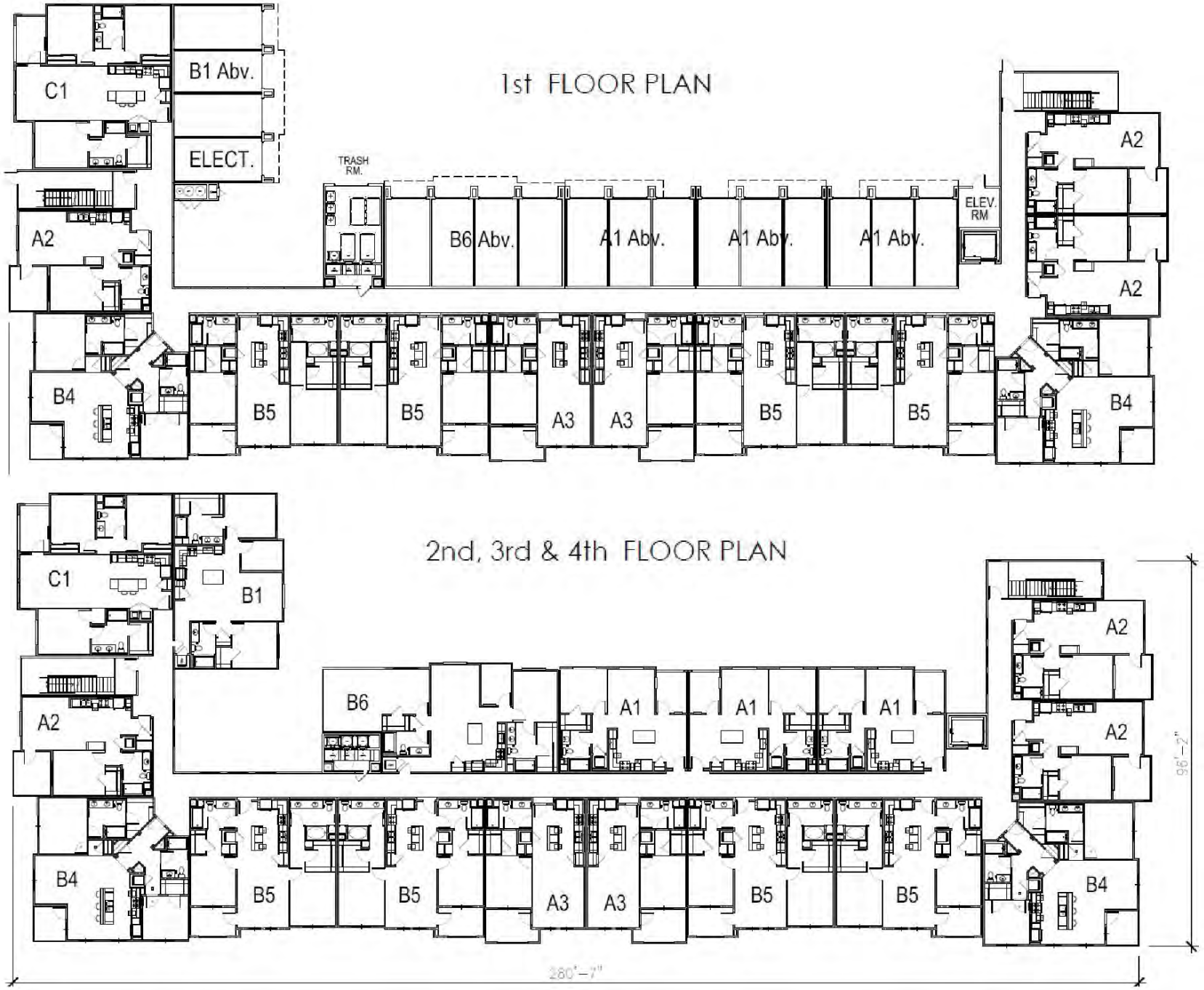

Exhibit 6i - Type F Building 11 - Floor Plans

Tennessee Village Mixed-Use Project
Redlands, California

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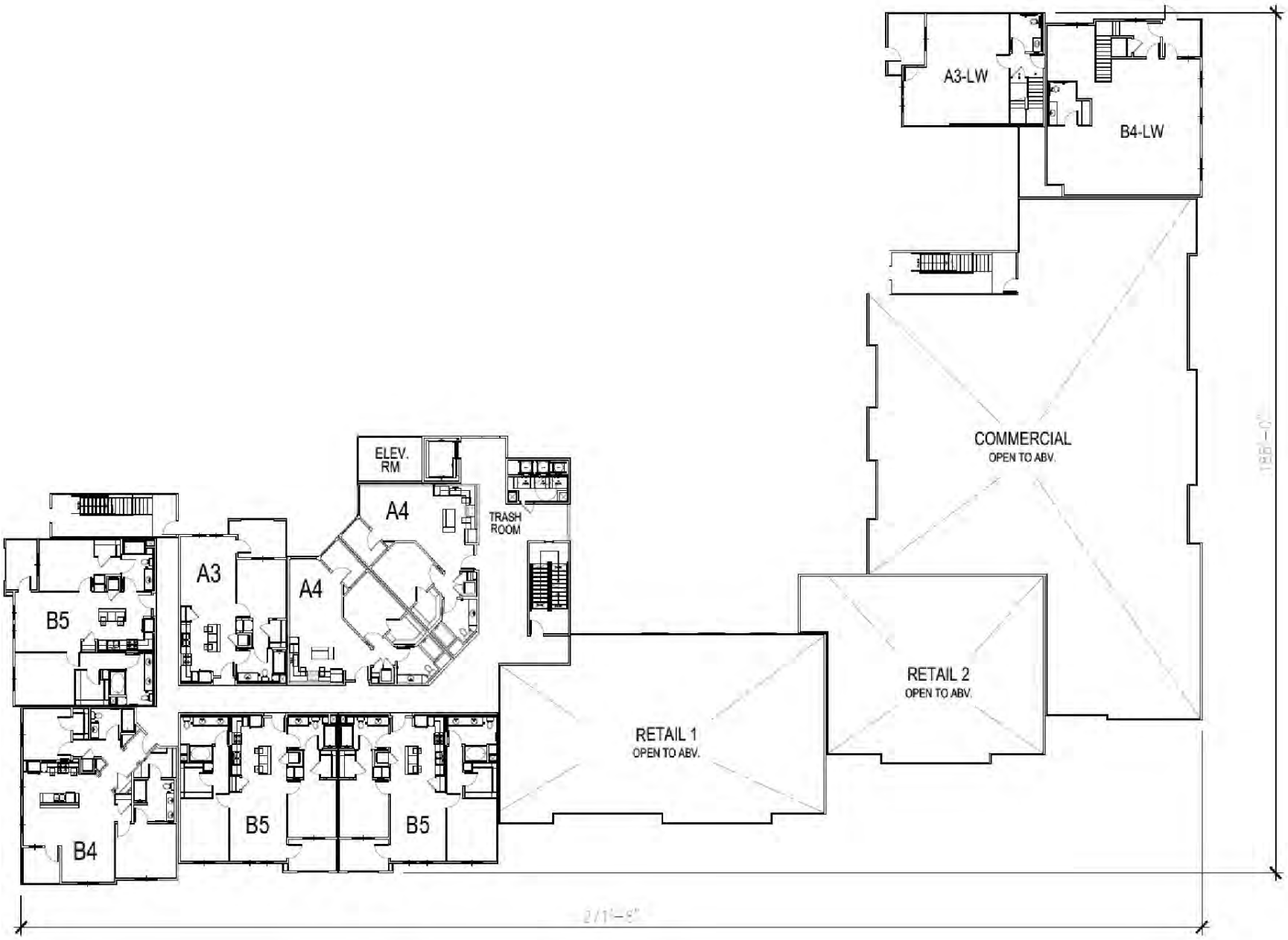

Exhibit 6j - Type G Building 10 - 1st Floor Plan

Tennessee Village Mixed-Use Project
Redlands, California

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3.1 – Environmental Factors Potentially Affected

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

☐	Aesthetics	☐	Agriculture Resources	☑	Air Quality
☑	Biological Resources	☑	Cultural Resources	☐	Energy
☑	Geology /Soils	☐	Greenhouse Gas Emissions	☑	Hazards & Hazardous Materials
☐	Hydrology / Water Quality	☐	Land Use / Planning	☐	Mineral Resources
☐	Noise	☐	Population / Housing	☐	Public Services
☐	Recreation	☐	Transportation/Traffic	☑	Tribal Cultural Resources
☐	Utilities / Service Systems	☐	Wildfire	☐	Mandatory Findings of Significance

3.2 – Determination

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

Name: Sean Reilly, Principal Planner Date

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4.1 – Aesthetics

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☑	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within view from a state scenic highway?	☐	☐	☐	☑
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public view are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☑	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☑	☐

a) Less than Significant Impact. Scenic vistas can generally be defined as natural landscapes that form views of unique flora, geologic, or other natural features that are generally free from urban intrusions. Such resources can be impacted when a structure is built that blocks the view of the vista, or if a development is built on the vista itself. Generally, these vistas play a significant role in the community's character, and will affect the way projects are designed, so as to take advantage of viewsheds.

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

city, and with a general elevation above 2,400 feet, the area is valuable to the city as natural habit and scenic resource. The General Plan ensures the preservation of Redlands' open space corridors and limits development on and around those areas to preserve its visual character and limit encroachment. The General Plan does not designate any scenic vistas within the city.

The project site is located on an undeveloped parcel of land in a mostly developed portion of the city. The project site is surrounded by undeveloped land to the north, south, and east, and is bounded by Interstate 210 (I-210) to the west. The project site is located in an urbanized area, and construction of the proposed mixed-use development would not interfere with the visibility of a scenic vista, as the area's urbanized setting already limits visibility of existing scenic vistas. Impacts to the visibility of scenic vistas in Redlands would be less than significant.

b) No Impact. There are no State Scenic Highways on or near the project site, and the site is not visible to a designated state scenic highway as identified on the California Scenic Highway Mapping System.[1] The nearest officially designated scenic highways are California State Route 243 just outside of Banning, and California State Route 38 near Big Bear Lake; the former starting approximately 25 miles southeast of the project site. As of this document being written, State Route 38 in Redlands has not been officially designated but is eligible. The project site is not located on or near any designated State Scenic Highway and the project site does not include any scenic resources. No impacts would occur.

c) Less than Significant Impact. The project site is currently an undeveloped parcel of land in an urbanized environment. The proposed residential and commercial mixed-use development has been designed according to City design guidelines. The maximum height of the of buildings as part of the proposed project would be 52 feet 6 inches; however, there is no height requirement for developments within the C-3 Zone.[2] The project includes a Specific Plan Amendment (SPA) to remove the site from East Valley Corridor Specific Plan; a Zone Change (ZC) to establish C-3 (General Commercial District) zoning for the site, a Conditional Use Permit (CUP) for the mixed use portion of the project; and a Tentative Parcel Map to subdivide the property into four lots. The project would comply with all applicable zoning regulations with the approval of the SPA and ZC, and would not deteriorate the visual quality of the project area. The proposed project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant.

d) Less than Significant Impact. Excessive or inappropriately directed lighting can adversely impact night-time views by reducing the ability to see the night sky and stars. Glare can be caused by unshielded or misdirected lighting sources, or reflective surfaces. Impacts associated with glare range from a simple nuisance to potentially dangerous. Sources of daytime glare are typically concentrated in commercial areas and associated parking areas that contain reflective materials such as hi-efficiency window glass, highly polished surfaces, and expanses of pavement. Development of parking improvements, related lighting, and associated glare prevention would be conducted in accordance with Conditions of Approval requiring that lighting be shielded and photometrics be provided demonstrating that light spillover is limited. Glare is not expected to result from the increase in pavement or from the proposed buildings as non-reflective materials and architectural coatings would be utilized in the project design. Adhering to Conditions of Approval for the project would ensure any impacts related to excessive or inappropriately directed lighting would be less than significant.

4.2 – Agriculture and Forest Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☑	☐
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☑
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 (g))?	☐	☐	☐	☑
d) Result in loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☑
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☑

a) Less than Significant Impact. The California Important Farmland Finder prepared by the California Department of Conservation does not identify the project site as being located on prime farmland, unique farmland, or farmland of Statewide Importance.[3] The project site is identified as Grazing Land by the Important Farmland Finder, and is categorized as Annual Grassland in Figure 6-2: Land Use and

Vegetation of the Vital Environment Element of the city's General Plan.[4] The project site is currently undeveloped and features scattered non-native vegetation and grasses, however, it is not zoned for agricultural uses, and is not currently used for agricultural or grazing purposes. There would be no conversion of farmlands to non-agricultural uses, and as such impacts would be less than significant.

b) No Impact. The project site is not located on land that is used for or conflicts with nearby agriculturally zoned land. The project is currently zoned as East Valley Corridor Specific Plan/Special Development, which only allows for agricultural uses in an interim setting until a Planned Development is approved.[5] Permitted land uses in the special district include those uses permitted in General Commercial, Commercial Industrial, Administrative Professional, Public Institutional, and Open Space Districts. A Zone Change from (East Valley Corridor Specific Plan/Special Development) to C-3 (General Commercial District) is proposed as part of the project. The parcel comprising the project site is not involved in an active Williamson Act contract, and there would be no conflict with existing zoning for agricultural use or a Williamson Act contract. No impacts would occur.

c) No Impact. Public Resources Code Section 12220(g) identifies forest land as *land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits*. The project site and surrounding properties are not currently being managed or used for forest land as identified in Public Resources Code Section 12220(g). The project site is currently zoned as East Valley Corridor Specific Plan/Special Development, which allows for permitted uses related to administrative, commercial, and light industrial uses as stated above. As such, development of the project would have no impact on any timberland or forestland zoning.

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

e) No Impact. The project site is currently undeveloped, vacant land with scattered non-native vegetation. The site and its surrounding areas are characterized by undeveloped land, residential, commercial, and light industrial land uses. None of the surrounding sites contain existing agricultural or forest uses. The development of this proposed project would not change the existing environment in a manner that would result in the conversion of forest land to non-forest use. No impact would occur.

4.3 – Air Quality

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☑	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☑	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☑	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☑	☐

An *Air Quality & Greenhouse Gas Assessment* was prepared for the proposed project by Urban Crossroads, dated September 30, 2022 (see Appendix A) to evaluate the air quality and greenhouse gas impacts associated with the construction and operation of the proposed project. The information presented below is summarized from this report, which is attached as Appendix A.

a) Less than Significant Impact. The project site is located within the South Coast Air Basin (SoCAB), which is characterized by relatively poor air quality. The Southern California Air Quality Management District (SCAQMD) has jurisdiction over an approximately 10,743 square-mile area consisting of the four-county Basin and the Los Angeles County and Riverside County portions of what use to be referred to as the Southeast Desert Air Basin. In these areas, the SCAQMD is principally responsible for air pollution control, and works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, as well as state and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet state and federal ambient air quality standards. Currently, these state and federal air quality standards are exceeded in most parts of the SoCAB. In response, the SCAQMD has adopted a series of AQMPs to meet the state and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and minimize any negative fiscal impacts of air pollution control on the economy.

In December 2022, the SCAQMD released the Final 2022 AQMP, which continues to evaluate current integrated strategies and control measures to meet the CAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing

existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels. Similar to the 2016 AQMP, the 2022 AQMP incorporates scientific and technological information and planning assumptions, including the 2020-2045 RTP/SCS, a planning document that supports the integration of land use and transportation to help the region meet the federal CAA requirements. Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the 1993 CEQA Handbook. These indicators are discussed below.

Criterion 1: The proposed 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 AQMP.

The violations that under this criterion refer to are the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if regional or localized significance thresholds were exceeded. CAAQS and NAAQS violations would occur if regional or localized significance thresholds were exceeded. As evaluated, the project's regional and localized construction and operational-source emissions would not exceed applicable regional significance thresholds. As such, a less than significant impact is expected. On the basis of the preceding discussion, the project is determined to be consistent with the first criterion.

Criterion 2: The project will not exceed the assumptions in the AQMP based on the years of project buildout phase.

The 2022 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the district are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in City of Redlands General Plan is considered to be consistent with the AQMP. Peak day emissions generated by construction activities are largely independent of land use assignments, but rather are a function of development scope and maximum area of disturbance. Irrespective of the site's land use designation, development of the site to its maximum potential would likely occur, with disturbance of the entire site occurring during construction activities. As such, when considering that no emissions thresholds would be exceeded, a less than significant impact would result. The city of Redlands General Plan designates the Project site for Commercial uses. The Commercial designation allows for a wide range of commercial uses including neighborhood-serving stores and convenience centers, regional commercial centers and commercial recreation. Additionally, this category allows for residential and mixed uses consistent with the zoning district. As the project is to consist of up to 35 multifamily residential dwelling units within 3-story buildings, 425 multifamily residential dwelling units located within 4 story buildings and a 17,899-sf retail component, the project's proposed uses are consistent with the site's land use designations, and a general plan amendment will not be required. For these reasons, the project is determined to be consistent with the second criterion.

Conclusion

On the basis of the preceding discussion, the proposed project is consistent with the site's land use designation, would not exceed any applicable regional or local thresholds, and would not result in or cause NAAQS or CAAQS violations. Therefore, the project would be consistent with the AQMP and a less than significant impact is expected.

b) Less than Significant Impact. The U.S. EPA, CARB, and the SCAQMD assess the air quality of an area by measuring and monitoring the amount of pollutants in the ambient air and comparing pollutant levels against the National and California Ambient Air Quality Standards (NAAQS and

CAAQS). The CAAQS designates the project site as nonattainment for O_3, PM_{10}, and $PM_{2.5}$ while the NAAQS designates the project site as nonattainment for O_3 and $PM_{2.5}$. The SCAQMD has published a report on how to address cumulative impacts from air pollution: White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. In this report the SCAQMD clearly states (Page D-3):

> *"…the SCAQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for TAC emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."*

Therefore, this analysis assumes that individual projects that do not generate operational or construction emissions that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which SoCAB is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Alternatively, individual project-related construction and operational emissions that exceed SCAQMD thresholds for project-specific impacts would be considered cumulatively considerable. The proposed project's estimated construction schedule and anticipated equipment usage is listed in Table 2 (Project Construction Schedule). The project is anticipated to be operational by the spring of 2026.

Table 2
Project Construction Schedule

Construction Phase	Duration (Days)(A)	Typical Equipment Used(B)
Site Preparation	10	Rubber Tired Dozers, Crawler Tractors
Grading	30	Excavators, Graders, Rubber Tired Dozers, Scrapers, Crawler Tractors
Building Construction	300	Cranes, Forklifts, Generator Sets, Tractors/Loaders/Backhoes, Welders
Paving	20	Pavers, Rollers, Paving Equipment
Architectural Coating	20	Air Compressors

Source: Urban Crossroads, 2024. See Appendix A.
(A) Days refers to total active workdays in the construction phase, not calendar days.
(B) The typical equipment list does not reflect all equipment that would be used during the construction phase. Not all equipment would operate eight hours per day each workday.

The SCAQMD's recommended thresholds of significance for criteria pollutants and incremental increases in health risk are shown in Table 3 (SCAQMD-Recommended CEQA Thresholds). The SCAQMD's CEQA Air Quality Significance Thresholds indicate that any projects in the SoCAB with

daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact.

Table 3
SCAQMD-Recommended CEQA Thresholds

Pollutant	Maximum Daily Emissions (lbs/day)	
	Construction	Operation
NO_X	100	55
VOC/ROG	75	55
PM_{10}	150	150
$PM_{2.5}$	55	55
SO_X	150	150
CO	550	550
Source: SCAQMD, 2019b		

Regional Construction Emissions Summary

The estimated maximum daily construction emissions without mitigation are summarized in Table 4 (Overall Regional Construction Emissions Summary). Detailed construction model outputs are included in Attachment A of Appendix A. Under the assumed scenarios, emissions resulting from the Project construction will not exceed thresholds established by the SCAQMD for emissions of any criteria pollutant.

Table 4
Overall Regional Construction Emissions Summary

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SOx	PM_{10}	$PM_{2.5}$
Summer 2024	4.42	23.40	54.90	0.05	5.95	2.06
Summer 2025	68.20	15.90	48.00	0.04	6.21	1.83
Winter 2023	4.99	47.20	39.20	0.06	8.44	5.07
Winter 2024	4.04	37.90	36.70	0.06	5.36	2.69
Winter 2025	2.70	14.60	34.80	0.04	5.29	1.59
Maximum Daily Emissions	**68.20**	**47.20**	**54.90**	**0.06**	**8.44**	**5.07**
SCAQMD CEQA Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Source: Urban Crossroads, 2024; Appendix A. Note: PM10 and PM2.5 source emissions reflect 3x daily watering per SCAQMD Rule 403 for fugitive dust.						

Regional Operational Emissions Summary

Operational activities associated with the project would result in emissions of CO, VOCs, NO_X, SO_X, PM_{10}, and $PM_{2.5}$. Operational related emissions are expected from the following primary sources: area source emissions, energy source emissions, and mobile source emissions. The project related operational air quality impacts derive primarily from vehicle trips generated by the project. Trip characteristics available from the *Tennessee Street and Lugonia Avenue Mixed-Use Measure U Growth Management Analysis* report were utilized in this analysis. The estimated operation-source emissions from the Project are summarized in Table 5 (Total Project Regional Operational Emissions). Detailed

operation model outputs are presented in Attachment A. As shown in Table 5, operational source emissions would not exceed the applicable SCAQMD regional thresholds for emissions of any criteria pollutant.

Table 5
Total Project Regional Operational Emissions

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SOx	PM_{10}	$PM_{2.5}$
Summer						
Mobile Source	11.60	8.66	79.10	0.18	5.96	1.16
Area Source	13.70	7.13	29.70	0.05	0.57	0.57
Energy Source	0.09	1.50	0.65	0.01	0.12	0.12
Total Maximum Daily Emissions	**25.39**	**17.29**	**109.45**	**0.24**	**6.65**	**1.85**
SCAQMD Regional Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Winter						
Mobile Source	10.70	9.28	68.20	0.17	5.96	1.16
Area Source	11.20	6.87	2.92	0.04	0.56	0.56
Energy Source	0.09	1.50	0.65	0.01	0.12	0.12
Total Maximum Daily Emissions	**21.99**	**17.65**	**71.77**	**0.22**	**6.64**	**1.84**
SCAQMD CEQA Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Urban Crossroads, 2024; Appendix A.
Note: PM10 and PM2.5 source emissions reflect 3x daily watering per SCAQMD Rule 403 for fugitive dust.

The project-specific evaluation of emissions presented in the preceding analysis demonstrates that proposed project operational-source air pollutant emissions would not result in exceedances of regional thresholds. Therefore, the proposed project operational-source emissions would be considered less than significant on a project-specific and cumulative basis. Impacts pertaining to construction and operational emissions would be considered less than significant.

c) Less than Significant Impact. The analysis below makes use of methodology included in the SCAQMD *Final Localized Significance Threshold Methodology* (LST Methodology). The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the federal and/or state ambient air quality standards. Collectively, these are referred to as Localized Significance Thresholds (LSTs). The SCAQMD established LSTs in response to the SCAQMD Governing Board's Environmental Justice Initiative I-41. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the sensitive receptor. The SCAQMD states that lead agencies can use the LSTs as another indicator of significance in its air quality impact analyses. It should be noted that SCAQMD also states that projects that are statutorily or categorically exempt under CEQA would not be subject to LST analyses. Projects exempt from CEQA also include infill projects that meet the H&S Code provisions. As such, although not required for this project, LST analysis is presented to further underscore that there are in fact no significant impacts associated with the project.

The SCAQMD recommends that the nearest sensitive receptor be considered when determining a project's potential to cause an individual or cumulatively significant impact. The nearest land use where

an individual could remain for 24 hours to the proposed project site has been used to determine localized construction and operational air quality impacts for emissions of PM_{10} and $PM_{2.5}$ (since PM_{10} and $PM_{2.5}$ thresholds are based on a 24-hour averaging time). The nearest receptor used for evaluation of localized impacts of PM_{10} and $PM_{2.5}$ is location R6 represented by the future residences adjacent and east of the project site, in the recently approved Lugonia Village Project (between the project's eastern boundary and Karon Street). Receptors in the project study area shown on Exhibit 2 of Appendix A.

As consistent with LST Methodology, the nearest industrial/commercial use to the project site was used to determine construction and operational LST air impacts for emissions of NO_X and CO as the averaging periods for these pollutants are shorter (8 hours or less) and it is reasonable to assume that an individual could be present at these sites for periods of one to 8 hours. It should be noted that the existing residence R6 is located at a closer distance than the nearest industrial/commercial use. As such, the same receptor was used for evaluation of localized NO_X and CO. It should also be noted that the LST Methodology explicitly states, "It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters (11)." As such, a 25-meter receptor distance was used for evaluation of localized PM_{10}, $PM_{2.5}$, NO_X and CO.

Localized Construction Emissions

Table 5 identifies the localized impacts at the nearest receptor location in the vicinity of the project. Outputs from the model runs for construction LSTs are provided in Attachment A of Appendix A. For analytical purposes, emissions associated with peak demolition, site preparation and grading activities are considered for purposes of LSTs since these phases represents the maximum localized emissions that would occur. Any other construction phases of development that overlap would result in lesser emissions and consequently lesser impacts than what is disclosed herein. As shown in Table 6 (Project Localized Construction Impacts), emissions resulting from the project construction will not exceed the numerical thresholds of significance established by the SCAQMD for any criteria pollutant. Thus, a less than significant impact would occur for localized project-related construction-source emissions and no mitigation is required.

Table 6
Project Localized Construction Impacts

On-Site Emissions	Emissions (lbs/day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Site Preparation				
Maximum Daily Emissions	47.00	38.00	8.19	5.02
SCAQMD Localized Threshold	**220**	**1,625**	**11**	**7**
Threshold Exceeded?	**No**	**No**	**No**	**No**
Grading				
Maximum Daily Emissions	40.90	32.70	4.65	2.78
SCAQMD Localized Threshold	**237**	**1,175**	**12**	**8**
Threshold Exceeded?	**No**	**No**	**No**	**No**

Source: Urban Crossroads, 2024; Appendix A.
Note: PM10 and PM2.5 source emissions reflect 3x daily watering per SCAQMD Rule 403 for fugitive dust.

The construction-source air pollutant emissions from the proposed project would not result in exceedances of regional thresholds. Therefore, proposed project construction-source emissions would be considered less than significant on a project-specific and cumulative basis.

Localized Operational Emissions

The proposed project is located on approximately 13.48 acres, and the total development is proposed to consist of 35 multifamily residential dwelling units within 3-story buildings, 425 multifamily residential dwelling units located within 4-5 story buildings and a 17,899-sf retail component. According to the SCAQMD LST methodology, LSTs would apply to the operational phase of a proposed project if the project includes stationary sources, or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., transfer facilities and warehouse buildings). The proposed project does not include such uses, and thus, due to the lack of significant stationary source emissions, localized operational emissions from the project are expected to be less than significant.

Toxic Air Contaminants

Construction Activities
During short-term construction activity, the project would result in the emission of some diesel particulate matter (DPM), which is a listed carcinogen and toxic air contaminant (TAC) in the State of California. The 2015 Office of Environmental Health Hazard Assessment (OEHHA) revised risk assessment guidelines suggest that construction projects as short as 2-6 months may warrant evaluation. Notwithstanding, given the distance of the project from surrounding sensitive receptors, the dominant wind patterns blowing to the southwest away for receptors (15), and the annual $PM_{2.5}$ emissions from equipment during each year of construction, any DPM generated from construction activity would result in less than significant ground level concentrations of DPM and not result in a significant health risks and no further evaluation is required.

Operational Activities
TACs analysis applies to the operational phase of a proposed project, if the project includes stationary sources, or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., transfer facilities and warehouse buildings). The proposed project does not include such uses, and thus, due to the lack of significant stationary source emissions, no TAC analysis is needed for operations.

CO Hot Spot Analysis

The Bay Area Air Quality Management District (BAAQMD) concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour (vph)—or 24,000 vph where vertical and/or horizontal air does not mix—in order to generate a significant CO impact. An adverse CO concentration, known as a “hot spot,” would occur if an exceedance of the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm were to occur. Traffic volumes generating the CO concentrations for the “hot spot” analysis is shown in Table 7 (CO Model Results). The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which has a daily traffic volume of approximately 100,000 vph and AM/PM traffic volumes of 8,062 vph and 7,719 vph, respectively. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm; this indicates that, should the daily traffic volume increase four times to 400,000 vehicles per day, CO concentrations (4.6 ppm x 4= 18.4 ppm) would still not likely exceed the most stringent 1-hour CO standard (20.0 ppm).

Table 7
CO Model Results

Intersection Location	Peak Traffic Volumes (vph)				
	Eastbound (AM/PM)	Westbound (AM/PM)	Southbound (AM/PM)	Northbound (AM/PM)	Total (AM/PM)
Wilshire Boulevard / Veteran Avenue	4,954 / 2,069	1,830 / 3,317	721 / 1,400	560 / 933	8,062 / 7,719
Sunset Boulevard / Highland Avenue	1,417 / 1,764	1,342 / 1,540	2,304 / 1,832	1,551 / 2,238	6,614 / 5,374
La Cienega Boulevard / Century Boulevard	2,540 / 2,243	1,890 / 2,728	1,384 / 2,029	821 / 1,674	6,634 / 8,674
Long Beach Boulevard / Imperial Highway	1,217 / 2,020	1,760 / 1,400	479 / 944	756 / 1,150	4,212 / 5,514
Source: Urban Crossroads, 2024; Appendix A.					

As summarized in Table 8 (Peak Hour Traffic Volumes), the intersection of SR-210 WB Ramps-Tennessee Street/San Bernardino Avenue would have the highest AM traffic volume of 2,343 vph and the intersection of Tennessee Street/Lugonia Avenue would have the highest PM traffic volume of 3,238 vph. As such, total traffic volumes at the intersections considered are less than the traffic volumes identified in the 2003 AQMP. Therefore, the project considered herein along with background and cumulative development would not produce the volume of traffic required to generate a CO "hot spot" either in the context of the 2003 Los Angeles hot spot study or based on representative BAAQMD CO threshold considerations. As shown in Table 8, the project would not result in potentially adverse CO concentrations or "hot spots." Therefore, CO "hot spots" are not an environmental impact of concern for the proposed project, and localized air quality impacts related to mobile-source emissions would therefore be less than significant.

Table 8
Peak Hour Traffic Volumes

Intersection Location	Peak Traffic Volumes (vph)				
	Eastbound (AM/PM)	Westbound (AM/PM)	Southbound (AM/PM)	Northbound (AM/PM)	Total (AM/PM)
SR-210 WB Ramps-Tennessee St / San Bernardino Ave	473/580	254/300	705/1180	911/571	2,343/2,631
Tennessee St / Lugonia Ave	536/999	246/267	434/1,290	675/682	1,891/3,238
Tennessee St / I-10 EB Ramps	718/819	574/786	680/1,074	0/0	1,972/2,679
Tennessee St / Colton Ave	646/670	825/897	199/681	352/459	2,022/2,707
Source: Urban Crossroads, 2024; Appendix A.					

d) Less than Significant Impact. The project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed project's (long-term operational) uses. Standard construction requirements would minimize

odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the solid waste regulations. The proposed project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed project construction and operations would be less than significant and no mitigation is required.

4.4 – Biological Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☑	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☑
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☑
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☑
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☑	☐

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☑

A *General Biological Resources Assessment* (see Appendix B) and *Burrowing Owl Survey Report* (see Appendix C) were prepared for the proposed project by MIG Inc., and are both dated July 2023. The reports analyze the potential impacts of the construction and operation of the proposed project to biological resources. The information presented below is condensed from the memos prepared by MIG and are attached as Appendix B and Appendix C, respectively.

a) Less than Significant Impact with Mitigation. The entire project area has been historically altered by mowing and discing, and all the landcover at the project site can be classified as Disturbed and/or Developed. Disturbed habitat type is composed primarily of early successional /ruderal plant species. Much of the vegetation present at the project site is non-native, and the site receives regular clearing to maintain compliance with fire code. A discussion of potential impacts to special-status plant and wildlife species is provided below.

Special-Status Plant Species

Special-status plants are defined here to include: (1) plants that are federal- or state-listed as rare, threatened, or endangered, (2) federal and state candidates for listing, (3) plants assigned a Rank of 1 through 4 by the CNPS Inventory, and (4) plants that qualify under the definition of "rare" in the CEQA, section 15380. The project site was initially determined to provide potentially suitable habitat for a total of 90 special-status plant species based on the proximity of the project to previously recorded occurrences in the region, vegetation types and habitat quality, topography, elevation, soil types, and other species-specific habitat requirements. As determined in the *General Biological Resources Assessment*, none of the 90 plant species are expected to occur on the project site, primarily due to disturbance such as historical discing and recent mowing. Therefore, impacts to special-status plant species would not occur as a result of the proposed project.

Special Status Wildlife Species

Special-status wildlife species include those species listed as endangered or threatened under the FESA or CESA; candidates for listing by the USFWS or CDFW; and species of special concern to the CDFW; and birds protected by the CDFW under CFGC Sections 3503 and 3513. According to the *General Biological Resources Assessment*, it was initially determined that 62 special-status wildlife species have been recorded in the vicinity of the project site. Of these wildlife species, 56 are not expected to occur on the project site. Reasons include the absence of essential habitat requirements for the species, the distance to known occurrences and/or the species distributional range, the limited availability of foraging and nesting habitat, amount of site disturbance from past and present land uses, and/or the proximity of existing human-related disturbances. The wildlife species that occur or have some potential to occur on-site include six (6) birds: Cooper's hawk [*Accipiter cooperii*], burrowing owl [*Athene cunicularia*], Swainson's hawk [*Buteo swainsoni*], California horned lark [*Eremonphila alpestris actia*], merlin [*Falco columbarius*], and loggerhead shrike [*Lanius ludovicianus*]. It is assumed that all of these species could potentially be present at the site because they have been observed in disturbed habitats and/or in similar habitats close proximity to the Project Site. These species could be affected by project construction and/or habitat

loss due the construction of the project. As such, and as detailed below, implementation of **Mitigation Measures BIO-1 and BIO-2** would be required to reduce potential impacts to special status wildlife species to a less than significant level.

Nesting Birds

Nesting birds are protected under California Fish and Game Code (CFGC) 3503, 3503.5, and 3512, which prohibits the take of active bird nests. Native and non-native shrubs and trees within the project site provide highly suitable nesting habitat for songbirds, including common species protected by the code. There is potential for ground- and tree-nesting birds to establish nests on the project site prior to any project-related construction. Construction activities including site mobilization, vegetation clearing, grading, and noise and vibration from the operation of heavy equipment have the potential to result in significant direct (i.e., death or physical harm) and/or indirect (i.e., nest abandonment) impacts to nesting birds. The loss of an active nest of common or special-status bird species and/or their eggs or young as a result of project construction would be considered a violation of the CDFGC, Section 3503, 3503.5, 3513. Therefore, implementation of **Mitigation Measure BIO-1** is required to reduce impacts to nesting birds to a less than significant level.

Burrowing Owls

As determined in the *Burrowing Owl Survey Report,* suitable habitat type (Disturbed and/or Developed) for burrowing owl was determined to be present on the project site. While no burrowing owls or sign thereof were observed on the project site, it was determined that burrows and other round structures present on the project site could potentially provide habitat for burrowing owls. Burrowing owls are commonly found in disturbed sites like the project site and can also be found in a wide variety of other open habitats such as grassland or deserts with sparse vegetation. As such, construction activities may impact burrowing owls in a manner like those already described under the discussion of nesting birds above. Therefore, implementation of **Mitigation Measure BIO-2** is required to reduce impacts to burrowing owls to a less than significant level.

b) No Impact. The project site is located in a developed area of the city of Redlands. As determined in the *Biological Resources Assessment,* no USFWS Critical Habitat is located within the project site. In addition, no sensitive plant communities were observed on the project site, and the site does not exhibit the characteristic attributes that may support sensitive plant communities (such as the known distribution and elevation, landscape position, plant species composition, soil and/or substrate type, water chemistry, and/or hydroperiod) as the project site is highly disturbed. Eight Sensitive Plant Communities were uncovered by the CDFW CNDDB (2023) search as being in the project vicinity; however, none of these communities occurs on the project site. In addition, no USFWS-designated critical habitat areas for any federally listed animals are present within the project boundary. Therefore, no impacts would occur.

c) No Impact. According to the *General Biological Resources Assessment*, no waterways, wetlands, or riparian vegetation subject to regulation by the USACE, CDFW, or RWQCB are present on the project site. Additionally, no features were detected by the National Wetlands Inventory at or immediately adjacent to the project site. The project area is relatively flat and fully separated from drainages such as the adjacent industrial complex as well as other developments in the area. There is no evidence (e.g., watermarks, vegetation, or other characteristics) that water flows from any jurisdictional waterway that may enter the project site. No evidence of previous ponding (no hydric vegetation, no hydric or clay soils, no evidence of hydrology/watermarks) was observed during the site visit or historical aerial photos that would suggest any suitable areas for vernal pools or vernal pool species. Therefore; there would be no impacts related to wetlands as a result of the project.

d) No Impact. The project site is expected to be utilized by common, non-special-status wildlife for foraging and possibly breeding. However, the project site is situated in an urbanized area and does not represent a wildlife movement corridor as it (along with other small neighboring vacant lots) is largely bound on all sides by developments, possesses vegetation that is largely non-native that would support high levels of species diversity, and it is too small of an area to support significant wildlife movement. According to the *Biological Resources Assessment*, no migratory wildlife corridors or native wildlife nursery sites were identified within the project site. The project site and surrounding area does not connect large areas of native habitats and development at this site would not preclude wildlife movement in otherwise open areas. Therefore, no impacts would occur as a result of the project.

e) Less than Significant Impact. The project would not conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. During construction operations, trees and other plant varieties would need to be removed to accommodate current building designs and construction. The removal of trees and plants during construction activities would not interfere with Redlands' Tree Protection Guidelines as outlined in the city's Municipal Code.[6] The Guidelines are applicable to "Native or Specimen trees, Landmark trees, and Public Trees" as defined by the city. As determined in the *Biological Resources Assessment*, plant species observed onsite were described as non-native, and there are no trees on the project site that have been designated as native or specimen by the city. In addition, there are no trees of any historic significance that would warrant a landmark designation. Therefore, impacts would be less than significant.

f) No Impact. The city of Redlands is an active participant in the Upper Santa Ana River Wash Habitat Conservation Plan (the Wash Plan).[7] The project site is located south of the plan, and outside of its boundaries. The project site is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other local, regional, or state habitat conservation plan. Therefore, no impacts would occur.

Mitigation Measures

BIO-1 **Pre-construction Survey for Nesting Birds.** To the extent feasible, construction activities should be scheduled to avoid the nesting season. If construction activities are scheduled to take place outside the nesting season, all impacts to nesting birds protected under the MBTA and California Fish and Game Code would be avoided. The nesting season for most birds in San Bernardino County extends from February 1 through September 1.

If it is not possible to schedule construction activities between September 1 and January 31, then pre-construction surveys for nesting birds will be conducted by a qualified biologist to ensure that no nests would be disturbed during project implementation. These surveys will be conducted no more than 5 days prior to the initiation of any site disturbance activities and equipment mobilization, vegetation removal, fence installation, grading, etc. If project activities are delayed by more than 5 days, an additional nesting bird survey will be performed. During this survey, the biologist will inspect all vegetation and other potential nesting habitats (e.g., shrubs) in and immediately adjacent to the impact area for nests. Active nesting is present if a bird is building a nest, sitting in a nest, a nest has eggs or chicks in it, or adults are observed carrying food to the nest. The results of the surveys will be documented.

If an active nest is found sufficiently close to work areas to be disturbed by these activities, the qualified biologist will determine the extent of a construction-free buffer

zone to be established around the nest (typically up to 300 feet for raptors and up to 100 feet for other species), to ensure that no nests of species protected by the MBTA and California Fish and Game Code will be disturbed during project implementation. Within the buffer zone, no site disturbance and mobilization of heavy equipment, including but not limited to equipment staging, fence installation, clearing, grubbing, vegetation removal, demolition, and grading will be permitted until the chicks have fledged.

A qualified biologist is an individual who has a degree in biological sciences or related resource management with a minimum of two seasonal years post-degree experience conducting surveys for nesting birds. During or following academic training, the qualified biologist will have achieved a high level of professional experience and knowledge in biological sciences and special-status species identification, ecology, and habitat requirements.

BIO-2: **Pre-construction Survey for Burrowing Owl.** No more than 14 days prior to ground disturbance a focused survey for burrowing owl will be required to ensure take avoidance. Even though burrowing owls were not located as part of the general biological survey, a pre-construction survey for burrowing owl is required because burrowing owls may encroach or migrate to the property at any time, and therefore steps should be taken to ensure avoidance, including reevaluating the locations/presence of burrowing owl or burrows. Pre-construction surveys shall be conducted in accordance with the survey requirements outlined in Appendix D of the CDFW's Staff Report on Burrowing Owl, dated March 7, 2012. If burrowing owl are found on the project site during pre-construction surveys, the biologist conducting surveys shall immediately contact the CDFW to develop a plan for avoidance and/or translocation prior to construction crews initiating any ground disturbance on the project site.

4.5 – 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?	☐	☐	☐	☑
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?	☐	☑	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☑	☐	☐

A *Cultural Resources Inventory and Evaluation Report* was prepared by Ecorp Consulting Inc., dated November 2022, to assess possible cultural and historical impacts associated with the construction and operation of the project (see Appendix D).

a) No Impact. A significant impact would occur if the proposed project would cause a substantial adverse change in the significance of a historic resource listed or eligible for listing in the California Resources of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). CEQA Guidelines state the term “historical resources” applies to resources that meet any of the following criteria for listing on the California Register of Historical Resources:

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

A field survey and records search conducted for the Cultural Report of this project identified one cultural resource within the project area: a concrete and brick water conveyance system. The system consists of six features: two north-south water channels, two concrete rectangular vaults, and two standpipe features. The conveyance system was used to irrigate orange groves northeast of Redlands and was likely built in 1945. According to the Ecorp report, the irrigation system identified onsite is not eligible for listing in the California Register of Historical Resources and is not listed on any Certified Local Government historic property register. As described in the Cultural Report, while the project site and the irrigation system were formerly used for agricultural purposes, they are not associated with events or persons that made significant contributions to the history of the local area. Development of the project would not have any physical impacts outside the designated project area boundary. The project would

not result in any adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5. No impact would occur.

b) Less than Significant with Mitigation Incorporated. The project site has been routinely disturbed over time and as such, any archaeological resources that may exist likely have been previously unearthed, disturbed, or left in place. While the field survey conducted as part of the Cultural Report did not identify any archaeological resources, the project area contains Holocene alluvial deposits synchronous with human occupation of the region. Due to the presence of these deposits, as well as the known ephemeral waterways in the vicinity of the project site, there does exist a moderate potential for buried pre-contact archaeological sites within the project site. While it is unlikely, it is possible that subsurface archaeological resources could be encountered during development of the proposed project. **Mitigation Measure CUL-1,** which requires evaluation if deposits are found that could be of cultural or human origin. With implementation of Mitigation Measure CUL-1 potential impacts would be less than significant.

c) Less than Significant with Mitigation Incorporated. No known human remains are anticipated to be located on or beneath the project site. However, these findings do not preclude the existence of previously unknown human remains located below the ground surface, which may be encountered during construction excavations associated with the project, and it is possible to encounter buried human remains during construction. Implementation of **Mitigation Measure CUL-1** will reduce potentially significant impacts to previously undiscovered human remains. With implementation of **Mitigation Measure CUL-1,** impacts would be less than significant as a result of construction of the proposed project.

Mitigation Measures

CUL-1: If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:

- If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately and no agency notifications are required.

- If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, the archaeologist shall immediately notify the lead agencies. The agencies shall consult on a finding of eligibility and implement appropriate treatment measures, if the find is determined to be a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines or a historic property under Section 106 NHPA, if applicable. Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the site either: 1) is not a Historical Resource under CEQA or a Historic Property under Section 106; or 2) that the treatment measures have been completed to their satisfaction.

- If the find includes human remains, or remains that are potentially human, they shall ensure reasonable protection measures are taken to protect the discovery

from disturbance (AB 2641). The archaeologist shall notify the San Bernardino County Coroner (per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California PRC, and AB 2641 will be implemented. If the coroner determines the remains are Native American and not the result of a crime scene, the coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the Project (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (§ 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (§ 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.

4.6 – Energy

Would the project:

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

An *Energy Consumption Estimate Report* was prepared for the proposed project by Urban Crossroads, dated February 7th, 2024 (see Appendix E) to evaluate the possible energy impacts associated with the construction and operation of the proposed project. The information presented below is summarized from the report and is attached as Appendix E.

a) Less than Significant Impact. The proposed project consists of the development of 460 new apartment units, approximately 17,899 square feet of commercial space, and associated landscaping and roadway improvements. Construction activities associated with the proposed project would require the use of heavy-duty, off-road equipment and construction-related vehicle trips that would combust fuel, primarily diesel and gasoline. Heavy-duty construction equipment would be required to comply with the California Air Resources Board's (CARB's) airborne toxic control measures, which restrict heavy-duty diesel vehicle idling to five minutes.

Once operational, the proposed project would consume energy for vehicle trips and electricity and natural gas usage. Operational vehicle trips are anticipated to consume approximately 257,711 gallons of gasoline, 19,752 gallons of diesel, and 119,905 kWh of electricity on an annual basis, upon its first year of operation. As estimated using CalEEMod, the proposed project buildings would consume approximately 2,322 megawatt-hours (mWh) of electricity and 5,940 million British Thermal Units (BTU) of natural gas per year. Electricity, natural gas, and gasoline fuel consumption are energy sources necessary to operate and maintain the proposed project in a safe manner. Lighting is essential for safety and security and natural gas consumption is needed for heating and other temperature-controlled activities. The proposed project would not cause a substantial environmental impact due to wasteful, inefficient, or unnecessary consumption or energy resources, during project construction or operation. As such, impacts would be less than significant.

b) Less than Significant Impact. The proposed project is consistent with the City of Redlands CAP, as discussed below in Section 4.9, Greenhouse Gas Emissions. The proposed project would not conflict with or obstruct any other state or local plan adopted for the purposes of increasing the amount of renewable energy or energy efficiency because no other plans are in place in the project area. Impacts would be less than significant.

4.7 – Geology and Soils

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☑	☐
ii) Strong seismic ground shaking?	☐	☐	☑	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☑	☐
iv) Landslides?	☐	☐	☐	☑
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☑	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☑	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☑

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

a.i) Less than Significant Impact. The city of Redlands, as well as the greater Southern California region, is considered a seismically active region. According to the Healthy Community Element of the city's General Plan, the project site is not located within an Alquist-Priolo Fault Zone, and there are no active or potentially active faults within or adjacent to the project site.[8] Crafton Hills Fault Zone (also known as the Redlands Fault) is the closest fault to the project site, and is located approximately 3.7 miles southeast of the project. This fault, however, is not categorized as an Alquist-Priolo Fault Zone, or as a San Bernardino County designated Fault Zone. According to the city General Plan, development should be restricted within and near Alquist-Priolo designated fault zones.[9] Furthermore, structures should incorporate design standards recommended by the most current California Building Code (CBC). The project is not located on or near a Alquist-Priolo fault zone, and would adhere to design and repair requirements adopted in the current city of Redlands Code of Ordinances from the 2022 CBC.[10] Design requirements adopted by the city would be sufficient in mitigating seismic hazards to the proposed project, and as such, impacts are determined to be less than significant.

a.ii) Less than Significant Impact. Given the project's location in a seismically active region, the site is subject to ground shaking. Per the city's General Plan, the potential for ground shaking and seismic-related damage is also dependent on the underlying soil composition. As indicated in the General Plan, much of the city of Redlands is built on alluvial deposits that create a potential for severe ground shaking.[11] The project site is of no greater risk to ground shaking than another area of Redlands, and while a structure may be damaged during an earthquake, adherence to design requirements adopted by the city from the CBC would minimize damage to property within the structure, as they are designed to not collapse. The CBC is intended to provide minimum requirements to prevent major structural failure and loss of life. As such, impacts due to ground shaking would be less than significant.

a.iii) Less than Significant Impact. Liquefaction is a form of ground failure that occurs when soil transforms from a solid state to liquefied condition due to intense seismic ground shaking. Liquefaction typically occurs in loose granular materials, such as alluvium-type soils, of which much of the city is built on. Saturated soils or areas located near waterways and areas with a high groundwater level are also susceptible to such ground failure. Parts of the city of Redlands are susceptible to liquefaction and ground failure, however, the city's General Plan indicates that the project site is not located in an area considered susceptible to liquefaction.[12] Impacts related to seismic-related ground failure and liquefaction would be less than significant.

a.iv) No Impact. The city's General Plan outlines areas in Redlands susceptible to landslides. According to the Healthy Community Element of the Redlands General Plan, the project site is not located in an area with high susceptibility, or even low to medium susceptibility, to landslide or ground subsidence.[13] Therefore, no impacts related to landslides would occur.

b) Less than Significant Impact. The project site is currently undeveloped, although it has been routinely disturbed and features non-native grasses and ruderal vegetation. The site is located in a mostly developed area of Redlands, characterized by residential, commercial, and light industrial land uses. Although the site is surrounded to the north, south, and east by undeveloped land, with Interstate 210 located at the western boundary of the project site. As the site is undeveloped, there is the potential to expose surface soils to wind and water erosion during demolition and construction activities. However, wind erosion would be minimized through soil stabilization measures required by SCAQMD Rule 403 (Fugitive Dust), such as daily watering.[14] Stormwater related erosion would further be prevented through control practices outlined in the Redlands NPDES program.[15] Following project construction, much of the site would consist of impervious surfaces consisting of houses, commercial businesses, and roadways. The completed project would also feature pervious surfaces in the form of accent landscaping within and around the perimeter of the project site, as well as a courtyard area for residential use. Trees, shrubbery, and other vegetation would keep in place topsoil, and further reduce any potential risk of soil erosion. Impacts related to soil erosion would be less than significant with the implementation of existing regulations.

c) Less than Significant Impact. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The downslope movement is due to a combination of gravity and ground shaking. Lateral spreading has been observed to generally take place toward a free face (i.e., retaining wall, slope, or channel) and to lesser extent on ground surfaces with a very gentle slope. As outlined in Sections 4.6.a.iii and 4.6.a.iv above, the project site is not located in an area susceptible to landslides or liquefaction. As the site has a low susceptibility to liquefaction, there is a low potential for lateral spreading to occur on the project site. The project is required to be constructed in accordance with the CBC, and keeping in compliance with existing CBC regulations would limit hazard impacts arising from unstable soils to less than significant levels.

d) Less than Significant Impact. Much of the city of Redlands is built on alluvium-type soils that are susceptible to liquefaction from ground-shaking and expansion with saturation. Expansive soils are susceptible to ground failure, and lead to property damage and human harm. Development of the proposed project is required to comply with the CBC as adopted by the City Code of Ordinances. The CBC requires building permits to comply with current building code standards. Such standards include the consideration of geological and seismic conditions. Prior to construction, soil conditions at the site would be identified and considered during the design process. Compliance with existing CBC regulations would reduce any impacts from potentially hazardous expansive soils to a less than significant amount.

e) No Impact. The project proposes to install new onsite water and sewer lines that would connect to the existing municipal sewer infrastructure in the surrounding streets. The proposed project would connect to this system and would not require the use of septic tanks. No impact would occur.

f) Less than Significant with Mitigation Incorporated. Development of the proposed project would require site preparation, grading, and construction operations. Given that the proposed project site has been previously disturbed, it is considered unlikely that paleontological resources (fossil evidence of life from past geologic time frames) would be found. However, in the event that paleontological materials are uncovered, **Mitigation Measure GEO-1** would ensure that uncovered resources are evaluated and curated as recommended by a qualified paleontologist. Therefore, impacts to paleontological resources would be less than significant.

Mitigation Measures

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

4.8 – 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?	☐	☐	☑	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☑	☐

A *Residential Air Quality & Greenhouse Gas Assessment* was prepared for the proposed project by Urban Crossroads, dated September 30, 2022 (see Appendix A) to evaluate the air quality and greenhouse gas impacts associated with the construction and operation of the proposed project. The information presented below is summarized from the report and is attached as Appendix A.

a) Less than Significant Impact. Gases that trap heat in the atmosphere and affect regulation of the Earth's temperature are known as GHGs. GHGs that contribute to climate change are a different type of pollutant than criteria or hazardous air pollutants because climate change is global in scale, both in terms of causes and effects. Some GHG are emitted to the atmosphere naturally by biological and geological processes such as evaporation (water vapor), aerobic respiration (carbon dioxide), and off-gassing from low oxygen environments such as swamps or exposed permafrost (methane); however, GHG emissions from human activities such as fuel combustion (e.g., carbon dioxide) and refrigerants use (e.g., hydrofluorocarbons) significantly contribute to overall GHG concentrations in the atmosphere, climate regulation, and global climate change.

The 1997 United Nations' Kyoto Protocol international treaty set targets for reductions in emissions of four specific GHGs – carbon dioxide, methane, nitrous oxide, and sulfur hexafluoride – and two groups of gases – hydrofluorocarbons and perfluorocarbons. These GHG are the primary GHG emitted into the atmosphere by human activities. The six most common GHG's are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride, hydrofluorocarbons (HFCs), and perfluorocarbons (PFCs).

The City of Redlands Climate Action Plan (CAP) was adopted on December 5, 2017. The CAP was prepared pursuant to Section 15183.5(b) of the CEQA Guidelines to be utilized as a tiering document for the General Plan as well as future projects within the City of Redlands that are consistent with the General Plan. The CAP incorporates the guidelines established in CARB's 2017 Scoping Plan. The 2017 Scoping Plan was prepared to meet the most current GHG emissions reduction targets set in Executive Order S-3-15 and SB 32 that recommends local governments to develop plans to reduce GHG emissions to 6 metric tons of carbon dioxide equivalent per year ($MTCO_2e/yr$) by the year 2030 and 2 $MTCO_2e/yr$ by the year 2050. Since the CAP was prepared in coordination with the General Plan that has a horizon year of 2035, the Redlands CAP also provided a year 2035 target of 5 $MTCO_2e/yr$,

which was determined through interpolation of the 2030 and 2050 GHG emissions targets from the 2017 Scoping Plan. The CAP also has a Year 2030 GHG emissions target of 6.0 per capita per year.

The estimated GHG emissions for the project land use are summarized in Table 9 (Total Project GHG Emissions. The estimated GHG emission include emissions from Carbon Dioxide (CO_2), Methane (CH4), Nitrous Oxide ($N0_2$), and Refrigerants (R). As shown in Table 9, the project would generate a total of approximately 2.94 $MTCO_2e$/SP.

Table 9
Total Project GHG Emissions

Source	Emission ($MTCO_2e$/yr)				
	CO_2	**CH_4**	**N_2O**	**R**	**Total CO_2E**
Construction-related emissions*	39.04	0.00	0.00	0.04	39.65
Mobile	2645.00	0.16	0.14	4.44	2696.00
Area	107.00	<0.005	<0.005	0.00	107.00
Energy	682.00	0.06	<0.005	0.00	685.00
Water	28.60	0.67	0.02	0.00	50.10
Waste	32.00	3.20	0.00	0.00	112.00
Refrigerants	0.00	0.00	0.00	0.49	0.49
Total CO_2E (All Sources)	3690.24				
Service Population	1254.53				
Total CO_2e/Service Population	**2.94**				
Threshold (CO_2E)	**6.00**				
Threshold Exceeded?	**No**				

Source: Urban Crossroads, 2024; Appendix A.
* Amortized over a period of 30 years.

The project would result in 2.94 $MTCO_2e$/SP per year in 2025 as summarized in Table 9. As such, the project total GHG emissions would not exceed the screening threshold of 6.0 $MTCO_2e$/SP per year. Thus, project-related emissions would not have a potential significant direct or indirect impact on GHG and climate change. Impacts would be less than significant.

b) Less than Significant Impact.

2022 CARB Scoping Consistency

Included in the 2022 Scoping Plan is a set of Local Actions (Appendix D to the 2022 Scoping Plan) aimed at providing local jurisdictions with tools to reduce GHGs and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development in order to determine consistency with the 2022 Scoping Plan. Notably, this section is focused on Residential and Mixed-Use Projects, in fact CARB states in Appendix D (page 4): "…focuses primarily on climate action plans (CAPs) and local authority over new residential development. It does not address other land use types (e.g., industrial) or air permitting."

Table 10 (Consistency with the 2022 Scoping Plan) summarizes the reduction actions/strategies by emissions source category to determine how the project would be consistent with or exceed reduction actions/strategies outlined in the 2022 Scoping Plan, and as shown, the Project would be consistent with the strategies discussed below.

Table 10
Consistency with the 2022 Scoping Plan

Reduction Strategy	Project Consistency Analysis
Smart Growth / Vehicles Miles Traveled	
Reduce VMT per capita to 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045	**Consistent.** The project site is currently undeveloped and would develop the underutilized land with 35 multifamily residential dwelling units within 3-story buildings, 425 multifamily residential dwelling units located within 4 story buildings and a 17,899-sf retail component. The project is within walking and biking distance between existing commercial and residential developments. Therefore, future residents traveling from and to the proposed project would have more access to work, educational and other destinations and would reduce VMT. As such, the project is consistent with this strategy.
New Residential and Commercial Buildings	
All electric appliances beginning 2026 (residential) and 2029 (commercial) contributing to 6 million heat pumps installed statewide by 2030	**Consistent.** The project is expected to utilize natural gas heating and/or cooking on-site. The City of Redlands has not adopted an ordinance or program limiting the use of natural gas for on-site cooking and/or heating. However, if one is adopted, the project would comply with the applicable goals or policies limiting the use of natural gas equipment in the future. As such, the project would be consistent with this strategy.
Non-combustion Methane Emissions	
Divert 75% of organic waste from landfills by 2025	**Consistent.** The project would be required to recycle and compost 75 percent of waste per AB 341. As such, the project would be consistent with the strategy.

2020-2045 RTP/SCS Consistency

The 2020-2045 RTP/SCS, developed with input from local governments, including the city of Redlands, establishes GHG emissions goals for automobiles and light-duty trucks for 2035, 2045 and establishes an overall GHG target for the region consistent with both the statewide GHG reduction targets for the post-2020 statewide GHG reduction goals. The 2020-2045 RTP/SCS is a long-range visioning plan to encourage and promote the safe and efficient management, operation, and development of a regional intermodal transportation system that, when linked with appropriate land use planning, will serve the

mobility needs of goods and people. Future investments seek to reduce traffic bottlenecks, improve the efficiency of the region's network, and expand mobility choices. The RTP/SCS is an important planning document for the region, allowing project sponsors to qualify for federal funding. In addition, the RTP/SCS is supported by a combination of transportation and land use strategies that help the region achieve state GHG emission reduction goals and federal Clean Air Act requirements, preserve open space areas, improve public health and roadway safety, support the vital goods movement industry, and use resources more efficiently.

Table 11 (Consistency with SCAG's 2020-2045 RTP/SCS) summarizes the project's consistency with the five strategies found within the SCAG's 2020-2045 RTP/SCS and as shown, the project would be consistent with the GHG reduction strategies contained within the SCAG's RTP/SCS. Implementing SCAG's RTP/SCS will reduce the regional GHG emissions from transportation, helping to achieve statewide emission reduction targets. The proposed project would be consistent with and would not conflict with the goals of the RTP/SCS; therefore, the proposed project would not interfere with SCAG's ability to achieve the region's year post-2020 mobile source GHG reduction targets outlined in the RTP/SCS, and it can be assumed that regional mobile emissions will decrease in line with the goals of the RTP/SCS.

Table 11
Consistency with SCAG's 2020-2045 RTP/SCS

Reduction Strategy	Applicable Land Use Tools	Project Consistency Analysis
Focus Growth Near Destinations and Mobility Options		
• Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations • Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets • Plan for growth near transit investments and support implementation of first/last mile strategies • Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses • Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods	Center Focused Placemaking, Priority Growth Areas (PGA), Job Centers, High Quality Transit Areas (HQTAs), Transit Priority Areas (TPA), Neighborhood Mobility Areas (NMAs), Livable Corridors, Spheres of Influence (SOIs), Green Region, Urban Greening.	**Consistent.** The Project site is currently undeveloped and would develop the underutilized land with 35 multifamily residential dwelling units within 3-story buildings, 425 multifamily residential dwelling units located within 4 story buildings and a 17,899-sf retail component. Therefore, future residents traveling from and to the proposed Project would have more access to work, educational and other destinations, as well as reduced commuting times and distances, which would all in turn reduce GHG associated with transportation. Therefore, the Project is consistent with the focus growth near destinations and mobility options strategy.

• Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations) • Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking)		
Promote Diverse Housing Choices		
• Preserve and rehabilitate affordable housing and prevent displacement • Identify funding opportunities for new workforce and affordable housing development • Create incentives and reduce regulatory barriers for building context sensitive accessory dwelling units to increase housing supply • Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions	PGA, Job Centers, HQTAs, NMA, TPAs, Livable Corridors, Green Region, Urban Greening	**Consistent.** The project site is currently undeveloped and would develop the underutilized land with 35 multifamily residential dwelling units within 3-story buildings, 425 multifamily residential dwelling units located within 4 story buildings and a 17,899-sf retail component. Therefore, similar to the discussion above, the Project is consistent with promoting diverse housing choices strategy.
Leverage Technology Innovations		
• Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space • Improve access to services through technology—such as telework and telemedicine as well as other incentives such	HQTA, TPAs, NMA, Livable Corridors.	**Consistent.** The project would include EV charging infrastructure and provide bike storage spaces in accordance with the California Green Building Standards Code. Therefore, the Project is consistent with leveraging technology innovations strategy and would promote alternative modes of transportation that would help the State, County and City meet their GHG reduction goals.

as a “mobility wallet,” an app-based system for storing transit and other multi-modal payments • Identify ways to incorporate “micro-power grids” in communities, for example solar energy, hydrogen fuel cell power storage and power generation		
Support Implementation of Sustainability Policies		
• Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions • Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations • Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space • Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies • Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region • Continue to support long range planning efforts by local jurisdictions	Center Focused Placemaking, Priority Growth Areas (PGA), Job Centers, High Quality Transit Areas (HQTAs), Transit Priority Areas (TPA), Neighborhood Mobility Areas (NMAs), Livable Corridors, Spheres of Influence (SOIs), Green Region, Urban Greening.	**Consistent.** As mentioned previously, the proposed project would install EV charging infrastructure and provide bike storage spaces to promote alternative modes of transportation. Additionally, the project would comply with sustainable development practices included in the 2022 Title 24 standards and CALGreen Code, including installation of vanpooling and carpooling parking spaces, installation of high-efficient lighting, and implementation of water-efficiency irrigation and drought-tolerant landscaping. Thus, the project would be consistent with supporting implementation of sustainability policies strategy.

• Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy		
Promote a Green Region		
• Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards • Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration • Integrate local food production into the regional landscape • Promote more resource efficient development focused on conservation, recycling and reclamation • Preserve, enhance and restore regional wildlife connectivity • Reduce consumption of resource areas, including agricultural land • Identify ways to improve access to public park space	Green Region, Urban Greening, Greenbelts and Community Separators.	The proposed project consists of currently undeveloped and would develop the underutilized land with 35 multifamily residential dwelling units within 3-story buildings, 425 multifamily residential dwelling units located within 4 story buildings and a 17,899-sf retail component and would not interfere with regional wildlife connectivity or concert agricultural land. The project would be required to comply with 2022 Title 24 standards and CALGreen Code, which would help reduce energy consumption and reduce GHG emissions. Thus, the project would support resource efficient development that reduces energy consumption and GHG emissions and the Project would be consistent with promoting a green region strategy.

City of Redlands General Plan and CAP Consistency

The city of Redlands adopted both the General Plan and CAP on December 5, 2017. The CAP was developed concurrently with the General Plan, which identifies the city's most current land use and transportation strategies and GHG implementation of various General Plan's goals and principles. The CAP provides actions to operationalize the General Plan policies that help with GHG reductions. As summarized in Table 12 (Consistency with the General Plan and Climate Action Plan), the project is consistent with the goals related to GHG emissions reductions in the General Plan and CAP. Thus, the

project would not obstruct the city of Redlands CAP GHG reduction measures and would not conflict with the GHG projections included in the CAP and the project would have a less than significant impact.

Table 12
Consistency with the General Plan and Climate Action Plan

Reduction Strategy	Project Consistency Analysis
General Plan Sustainable Community Element	
Goal: Serve as an environmental steward; ensure that residents enjoy clean air and water; make efficient use of energy, water, and land resources; and grow in a manner in which increased population does not negatively impact resources (25). • 8-P.8: Promote sustainability by reducing the community's greenhouse gas (GHG) emissions and festering green development patterns- including buildings, sites, and landscapes. • 8-P.9: Undertake initiatives to enhance sustainability by reducing the community's GHG emissions.	**Consistent.** The project site is currently undeveloped and would develop the underutilized land with 35 multifamily residential dwelling units within 3-story buildings, 425 multifamily residential dwelling units located within 4 story buildings and a 17,899-sf retail component. The project would comply with Title 24 Building Energy Efficiency Standards and is within walking and biking distance between existing commercial and residential developments. Additionally, the Project would provide EV infrastructure and bike storage spaces. Therefore, the Project would be consistent with this goal and promote growth in a manner in which the future population does not negatively impact resources.
Climate Action Plan	
All electric appliances beginning 2026 (residential) and 2029 (commercial) contributing to 6 million heat pumps installed statewide by 2030.	**Consistent.** The project is expected to utilize natural gas heating and/or cooking on-site. The City of Redlands has not adopted an ordinance or program limiting the use of natural gas for on-site cooking and/or heating. However, if one is adopted, the project would comply with the applicable goals or policies limiting the use of natural gas equipment in the future. As such, the project would be consistent with this strategy.

Finally, the project is consistent with the general plan land use designation, density, building intensity, and applicable policies specified for the project area in SCAG's Sustainable Community Strategy/Regional Transportation Plan, which pursuant to SB 375 calls for the integration of transportation, land-use and housing policies to plan for achievement of the GHG-emissions target for the region. Thus, a less than significant impact related to GHG emissions from project construction and operation would occur and no mitigation is required.

4.9 – Hazards and Hazardous Materials

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☑	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☑	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☑	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☑
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☑	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☑	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☑	☐

A *Phase I Environmental Site Assessment and Limited Phase II Site Assessment* was prepared for the proposed project by Petra Geosciences, dated June 20, 2022 (see Appendix F) to evaluate the potential

presence of hazardous materials on the project site. The information presented below is summarized from the report and is attached as Appendix F.

a) Less than Significant Impact. Construction of the proposed project would require the temporary use and transport of fuels, equipment, earth and building materials, as well as other potentially hazardous materials. The contractor would be required to develop and adhere to a Health and Safety Plan, which pursuant to California state Health and Safety Code Chapter 6.95, Division 20 (§§ 25500-25532), would minimize potentially hazardous effects of handling potentially hazardous materials during construction.[16] The project is within the jurisdiction of the Environmental Protection Agency (EPA) and County of San Bernardino, both of which manage the inspection, regulation, transportation, use, and disposal of hazardous materials in Redlands. Development of the project will comply with the standards and regulations of both bodies. Adherence to local, state, and federal regulations, impacts related to the potential disposal or transport of onsite hazardous materials or waste would be less than significant.

The project site is currently zoned as EV/SD (East Valley Corridor Specific Plan/Special Development). The proposed project includes a Zone Change (ZC) to establish C-3 (General Commercial District) zoning for the site. The C-3 zoning designation allows for mixed-use and residential uses, with the residential density permitted as R-3 (multi-family residential district). Development of the project includes 460 new apartment units and the development of approximately 17,899 square feet of commercial space. The transport, use, and/or disposal of hazardous materials is not associated with or expected with the development of onsite residential land uses. While specific commercial uses are not known at the time of this document's preparation, such uses would not require the routine transport and/or use of hazardous materials associated with industrial-related businesses, as those uses are not permitted as part of the C-3 zoning designation. Any hazardous materials used in conjunction with commercial uses would include relatively limited amounts of cleaners, lubricants, and pesticides. Such materials would be disposed of with other Household Hazard Wastes (HHWs) generated from onsite residences. HHWs are prohibited or discouraged from being disposed of at local landfills. As such, the San Bernardino County Fire Protection District operates a Household Hazardous Waste Program, with 14 permanent HHW collection facilities.[17] These facilities would allow easy disposal of any HHW generated from future residents and businesses of the site. With adherence to local regulations, the use of common household hazardous materials, created waste, and their disposal would not present a substantial health risk to the community. As such, impacts would be less than significant.

b) Less than Significant Impact. Based on information obtained during the Phase I Environmental Site Assessment (ESA), the project site appears to have been developed as an orchard since at least 1930 until sometime between/during 1975 and 1985. Infrared aerial photographs suggest that sometime between/during 1975 and 1985 the orchards were removed from the project site and some sort of irrigated vegetation was present over portions of the project site. Irrigated vegetation areas decreased between the 1985 and 1989 photographs. Some sort of managed vegetation was noted within the southern portion of the project site in the black and white aerial photograph from 1994. Sometime between/during 1994 and 2002, the project site appeared to be fallow land and has remained vacant land to present day. Minor debris was also observed along the northern and western portions of the project site, consisting mostly of windblown trash, a car bumper, and remnants of a reclining chair. One area of plywood fragments and plastic sheeting was observed in the central portion of the project site. A concrete irrigation valve riser located in the northwest corner of the project site contained dumped trash and plastic bags. There were no visible signs of this trash containing hazardous substances; however, the trash was not disturbed.

No water wells were observed within the project site during the Phase I ESA. Two concrete irrigation valve risers were observed along the northern boundary of the project site, within the proposed Pennsylvania Avenue extension. Remnants of north-south orientated concrete and brick irrigation

channels were observed north of the proposed Pennsylvania Avenue extension and near the east property boundary. There are no current visual signs that these channels extended into the project site. In addition, remnants of a concrete and brick irrigation valve box with exposed concrete pipe trending east-west along the north side of the dirt road at the northern boundary of the project site was observed. The concrete pipe is estimated to connect with the two concrete irrigation valve risers. No wooden power poles, pole-mounted transformers, or ground mounted transformers are located within or adjacent to the project site. There was no evidence of drums, sumps, pits, pools, or lagoons identified during our site reconnaissance.

One site was identified in a search of various government agency database records, which appears to have adversely impacted the soils, groundwater or soil vapor beneath the project site at this time – the former Lockheed Martin facility (1500 Crafton Avenue), in northeast Redlands (approximately 4.5 miles east-northeast of the project site). Based upon groundwater monitoring results, the project site is located within the Crafton-Redlands Plume boundary, a groundwater plume with known synthetic perchlorate and trichloroethylene (TCE) contamination. Although the boundary of the plume varies in publications, groundwater monitoring wells associated with the plume extends from the former Lockheed Martin facility in northeast Redlands west to near the Waterman Avenue/Interstate 10 interchange. Groundwater monitoring wells associated with the Crafton-Redlands Groundwater Plume are mapped throughout the Redlands area. The closest monitoring wells to the project site, COR#30-A, COR#31-A, and COR#32, are situated east in Texonia Park on Texas Street.

Recognized Environmental Conditions

Recognized Environmental Conditions (REC's) are defined by the American Society of Testing and Materials (ASTM) as any hazardous substance or petroleum product under conditions that indicate an existing, past, or material threat of release into the structures, ground, groundwater, or surface water at the subject site. If the presences of recognized environmental conditions are identified on a subject site, it may warrant additional research, site evaluation, and/or action. However, no REC's have been identified within or affecting the project site.

Controlled recognized environmental conditions (CREC's) are defined by the American Society of Testing and Materials (ASTM) Practice E 1527-13 as a recognized environmental condition resulting from the past *release* of *hazardous substances* or *petroleum products* that has been addressed to the satisfaction of the applicable regulatory authority (i.e., as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with *hazardous substances* or *petroleum products* allowed to remain in place subject to the implementation of required controls. One CREC (former Lockheed Martin Facility), related to a groundwater plume containing TCE and synthetic perchlorate, has been identified underlying the project site. The former Lockheed Martin Facility is mapped approximately 4.5 mile east-northeast of the project site.

Historical recognized environmental conditions (HREC's) are defined by the American Society of Testing and Materials (ASTM) Practice E 1527-13 as a past release of any *hazardous substances or petroleum products* that has occurred in connection with the *property* and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory agency, without subjecting the *property* to any required controls (i.e., *property* use restrictions, *activity and use limitations*, *institutional controls* or *engineering controls*). However, no HREC'S have been identified within or affecting the project site.

The Phase I Environmental Site Assessment found no evidence of recognized environmental conditions in connection with the project site. However, it was determined that the project site is located within the Crafton-Redlands Plume boundary, a groundwater plume with known trichloroethylene (TCE)

contamination. Strict definition of the Crafton-Redlands plume warrants it to be labeled as a Controlled Recognized Environmental Condition; however, based on 2021 measured depths to groundwater (approximately 195 feet below grade [fbg]), the concentrations of TCE are reported to be sufficiently low (below MCLs in close proximity to the site) as to not present a health risk to future residents. Additionally, synthetic perchlorate concentrations are slightly above the MCL and decreasing in close proximity to the project site. Finally, because of the known presence of groundwater contamination and the source, the Regional Water Quality Control Board will more than likely not identify future property owners as Responsible Parties. As a result, the plume underlying the site is considered a de minimis condition.

Limited Phase II Site Assessment

Based upon the property being used as an orchard from at least 1930 to sometime before/during 1985, it was determined that the potential exists for restricted agricultural chemicals (i.e., pesticides) to have been legally applied to the project site. This legal application may have resulted in pesticide residues to be detectable within the subject site. As a result of the proposed land-use change to residential, a Limited Phase II Soil Residue Survey was conducted to evaluate shallow, near surface site soils for detectable pesticide residues. To evaluate pesticide soil residues within the site, soil samples were collected and were discretely analyzed for Organochlorine Pesticides (OCPs) according to Environmental Protection Agency (EPA) Test Method 8081A, and arsenic and lead according to EPA Method 6010B. Three of the samples were analyzed for Title 22 Metals, including arsenic and lead, according to EPA Method 6010B/7471A, one sample was tested for Chlorinated Herbicides using EPA Method 8151A, and four of the 0 to 1-foot samples were analyzed for Total Petroleum Hydrocarbons using EPA Method 8015B. All soil samples analyzed during this assessment were analyzed by Enviro-Chem, Inc. (ECI) in Pomona, California. ECI is accredited by the California Environmental Protection Agency, Department of Health Services Environmental Laboratory Accreditation Program (ELAP). Analyses were requested on a chain-of-custody record. Below is a discussion of the laboratory results.

Organochlorinated Pesticides

Seven discreet and one duplicate soil samples collected at a depth of 0 to 1 foot were tested for Organochlorinated Pesticides (OCPs) according to EPA Method 8081A. All detectable concentrations of Dichlorodiphenyldichloroethylene (DDE) were found to be below the USEPA Region 9 Regional Screening Level (RSL) of 2.0 mg/kg for DDE residential use soils. No other OCP analytes were reported at concentrations above their respective actual detection limit (ADL). Based upon these results, soil containing OCPs residues, DDE, are not considered a recognized environmental condition (REC). As such, no further action is warranted, and near surface soils may be reused as fill materials during grading of the proposed project.

Chlorinated Herbicides

One of the samples collected from a depth of 0 to 1 foot was also analyzed for Chlorinated Herbicides. No detectable levels of Chlorinated Herbicides were present in the sample analyzed. Based upon these results, soil containing chlorinated herbicide residues were not detected above the ADL and are not considered an REC. As such, no further action is warranted, and near surface soils may be re-used as fill materials during grading of the proposed residential project.

Title 22 Metals

Seven discrete soil samples and one duplicate sample collected at a depth of 0 to 1 foot were analyzed for arsenic and lead using EPA Method 6010B based upon their historical use as pesticides. In addition, three discrete soil samples collected at a depth of 0 to 1 foot were tested for CAM Title 22 Metals using EPA Method 6010B/7471. Detected levels of barium, chromium, cobalt, copper, lead, mercury, nickel,

vanadium and zinc were reported below their respective Regional Screening Levels (RSLs) for residential use soil.

Arsenic. A total of eleven tests were ran for residual arsenic levels on eight discrete samples collected from a depth of 0 to 1 foot on the project site (including one duplicate). Arsenic levels detected onsite are well under concentrations and considered background levels. As a result of screening near-surface soils onsite for elevated arsenic residues, concentrations are highly likely related to background levels and not associated with historic pesticide usage.

Lead. Lead residues was reported in the seven discrete samples and one duplicate sample analyzed ranging from 2.38 mg/kg to 21.0 mg/kg. The USEPA RSLs were evaluated for lead residues in soil pertaining to residential land use. Based upon the results, soils containing Title 22 Metal residues, including arsenic and lead, were not detected above their respective residential soil RSL's, DTSC's SL's, or background levels, and are not considered an REC. As such, no further action is warranted, and near surface soils may be re-used as fill materials during grading of the proposed residential project.

Total Petroleum Hydrocarbons. Since petroleum hydrocarbons may have been historically used for weed abatement or dust control in the orchards, three discrete soil samples collected at a depth of 0 to 1 foot were analyzed for total petroleum hydrocarbons (TPH) - carbon chain using EPA Method 8015B. None of the three samples reported TPH-gasoline chain (TPH-g), TPH-diesel chain (TPH-d), and TPH-motor oil chain (TPH-mo) concentrations above non-detect. Based upon the results, soils containing TPH-g, TPH-d, and TPH-mo residues were not detected above the ADL and are not considered a recognized environmental condition (REC). As such, no further action is warranted, and near surface soils may be re-used as fill materials during grading of the proposed residential property.

The proposed project would be required to adhere to the site considerations and recommendations of the *Phase I Environmental Site Assessment and Limited Phase II Site Assessment* as a condition of approval. As such, adherence to the site considerations and recommendations would ensure any impacts to the public through the accidental release of hazardous materials would be less than significant.

c) Less than Significant Impact. Lugonia Elementary School is located approximately 1.1 miles east of the project site. Citrus Valley High School is located approximately 1.3 miles northeast of the project site. The proposed project involves the development of a multi-family mixed-use development that includes 460 new apartment units with approximately 17,899 square feet of commercial space. Daily operation of the proposed project would not involve the use of acutely hazardous materials, substances, or wastes. The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing school. Impacts would be less than significant.

d) No Impact. The proposed project is not located on a site listed on the state *Cortese List*, a compilation of various sites throughout the state that have been compromised due to soil or groundwater contamination from past uses.[18] Based upon review of the *Cortese List*, the project site is not:

- listed as a hazardous waste and substance site by the Department of Toxic Substances Control (DTSC),[19]
- listed as a leaking underground storage tank (LUST) site by the State Water Resources Control Board (SWRCB),[20]
- listed as a hazardous solid waste disposal site by the SWRCB,[21]
- currently subject to a Cease and Desist Order (CDO) or a Cleanup and Abatement Order (CAO) as issued by the SWRCB,[22] or

- developed with a hazardous waste facility subject to corrective action by the DTSC.[23]

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

e) Less than Significant Impact. The proposed project is not located within 2 miles of a public or private use airport. The project is located approximately 2.3 miles southeast of the San Bernardino International Airport, and 4 miles west of the Redlands Municipal Airport.[24] No impact would occur with regard to safety hazards or excessive airport noise.

f) Less than Significant Impact. Construction work along Tennessee Street would include lateral utility connections and half-width roadway improvements. These activities would require temporary street or lane closures during construction and could potentially result in the diversion of traffic onto other area roadways. However, the project applicant would be required to prepare and implement a traffic control plan for construction. Implementation of a traffic control plan would ensure that construction of the proposed project would not interfere with access for emergency personnel or the evacuation of onsite staff in an emergency. Implementation of a traffic control plan would also ensure that construction operations would not significantly impede movement on any major evacuation routes identified in the city's General Plan, including Interstates 10, 15, 210, and 215, and State Highways 30, 60, 66, 71, and 83. While the project is located adjacent to I-210, its development would not impact the availability of the route, or the other identified highways and roadways as evacuation routes. The project as proposed includes three points of entry into the project: one off Tennessee Street, one off Pennsylvania Avenue, and one at the future commercial development proposed to the south of the project site. Development of the proposed project would not impact the implementation of or physically interfere with an adopted emergency response plan or evacuation plan because no permanent public street or lane closures are proposed. Therefore, project impacts would be less than significant.

g) Less than Significant Impact. The project site is not located within a State Responsibility Areas (SRA). The nearest SRA area is located approximately 3.5 miles south of the project site near the San Timoteo Canyon.[25] There are no wildland conditions in the urbanized area where the project site is located. Any potential impacts related to wildland fire would be less than significant.

4.10 – 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?	☐	☐	☑	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☑	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☑	☐
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☑	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☑	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☑	☐
iv) impede or redirect flood flows?	☐	☐	☑	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☑	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☑	☐

A *Preliminary Water Quality Management Plan* (WQMP) dated February 7, 2024 (see Appendix G), a *Hydrology and Hydraulics Report* (Hydrology Report) dated September 2023 (see Appendix H), and a *Preliminary Sewer Sizing Memo* (Sewer Memo) dated October 2023 (see Appendix I) were prepared for the proposed project by Kimley Horn & Associates, Inc.to evaluate the potential water quality impacts associated with the construction and operation of the proposed project. The information presented below is condensed from the above documents and is attached as Appendices G, H, and I respectively.

a) Less than Significant Impact. While the project site is currently undeveloped, it has been regularly disturbed overtime or agricultural uses, and is located in an urbanized area of Redlands. The project proposes the development of 460 new apartment units, approximately 17,899 square feet of commercial space, as well as associated landscaping and roadway improvements to the site. The new streets, sidewalks, and structures on the project site would increase the amount of impermeable surfaces, as well as increase flows into storm drains. Construction and use of the proposed apartments would be required to comply with federal, state and local water guidelines and requirements.

According to the city's General Plan, Redlands is part of the Upper Santa Ana River Watershed Integrated Regional Water Management Plan (IRWM), which aims to improve water supply reliability, flood management, stormwater recharge, water quality, and habitats/open space. Development of the proposed project would be required to adhere to benchmarks outlined in the San Bernardino Valley Regional Urban Water Management Plan (RUWMP), of which the city is one of 10 water providers included.[26] Landscaping proposed with the project would be utilized to limit runoff and provide permeable surfaces throughout the site. Compliance would include following irrigation schedules, water efficiency audits, and non-potable irrigation systems among other guidelines.

The project must also adhere to all Santa Ana Regional Water Quality Control Board (SARWQCB) permitting requirements for construction and NPDES standards for stormwater runoff, as well as adhere to city ordinances requiring the use of Best Management Practices (BMPs) to control the release of potential pollutants entering storm drain systems.[27] Such BMPs include, but are not limited to; routine street sweeping, routine storm drain and catch basin cleaning, regular pavement repair/maintenance, and spill prevention practices. Non-structural, structural source control BMPs, and Low Impact Development (LID) BMPs are included in the preliminary WQMP (Appendix G) and shall be implemented as part of the project. With implementation of BMPs and city and regional standards and guidelines, impacts to water quality standards or waste discharge requirements would be less than significant.

b) Less than Significant Impact. Construction of the proposed residential and commercial mixed-use development has the potential to interfere with groundwater recharge. According to the Hydrology Report prepared for this project, groundwater was not encountered during the field investigation of the project site. The maximum depth explored was 51.5 feet, and while the site's historical groundwater depth is unknown, it is anticipated to be approximately 95 feet below the ground surface. The nearest groundwater well is located approximately 0.5 miles east of the project site, adjacent to Texonia Park off Pennsylvania Avenue. The well has a depth of 743 feet and as of writing this document, the latest measurement recorded was a depth to water of 218.7 feet taken September 9th, 2023.[28]

The project includes the development of 460 residential multi-family dwelling units, as well as approximately 17,899 square feet of commercial space, and associated landscaping and roadway improvements, all within a 13.48-acre parcel. Building, road, sidewalk, and parking development onsite would compromise of a total of 412,152 square feet or 9.46 acres of impervious surfaces. The paving of previously undeveloped land and the increase in building surface area would increase impervious surface coverage on the site, thereby potentially reducing the total amount of infiltration onsite. The remaining 175,037 square feet, or 4.02 acres of the project site would be compromised of open space

and landscaping coverage. The project site will have two drainage areas that will capture on-site storm runoff and convey water to various on-site inlets throughout the site. Flows will be diverted to two onsite underground infiltration facilities. The project site is not utilized for groundwater recharge and would include landscaping and drainage improvements that would contribute to infiltration. The development of the project site would have a less than significant impact on groundwater recharge.

c.i) Less than Significant Impact. The city of Redlands is located in and around several regional watersheds. The city's existing water system is reliant on the Mill Creek and Santa Ana Watersheds. No rivers or streams intersect the project site, and the project would not alter existing drainage patterns and facilities, as it would install new onsite water and storm drains that would connect to the existing infrastructure in the surrounding streets. Those facilities will be regularly maintained. Development of the proposed project will require site grading, which will require a standalone Erosion Control Plan per the city of Redlands.[29] Adherence to the city's erosion plan guidelines during construction of the project and proper maintenance of drainage facilities would decrease any likelihood of erosion of sensitive stream habitats. Impacts related to erosion or siltation would be less than significant.

c.ii) Less than Significant Impact. There are no rivers or streams that intersect the project site, and as such, development of the project would not result in the alteration of any stream course. During construction, the project applicant would be required to comply with drainage and runoff guidelines pursuant to Redlands Municipal Code Chapter 15.54.200.[30] A total of 412,152 square feet (70%) of the project site would consist of buildings, roads, and parking coverage. The majority of the project site would therefore consist of impervious surfaces and would increase the net area of impermeable surfaces on the site and, therefore, may increase discharges to the city's existing storm drain system.

A new on-site storm drain system, designed for the 100-yr 1-hr storm, will be installed to collect surface runoff at designated storm inlet locations across the site and convey flows downstream. The project site will be delineated into 2 major drainage areas. The drainage areas will capture on-site storm runoff and convey water to various on-site inlets throughout the site. These flows will be diverted to two onsite proprietary underground infiltration systems that will serve as the water quality facilities. Per San Bernardino water quality design requirements, the two underground detention systems also have the purpose of allowing storm runoff to infiltrate into the subsurface soils. Additionally, each infiltration system is outfitted with an orifice downstream. The water captured in the detention system will work in conjunction with proposed infiltration basins which will serve as the water quality infiltration BMPs. They will retain the 100-year storm, 24-hour event so the ultimate post construction stormwater flow is no more than the pre-construction stormwater flow. There is no existing stormwater infrastructure for the project to connect to. A proprietary pump is included in the design at the western boundary of the site to bring stormwater to grade. Construction of the proposed project would be required to adhere to all SARWQCB permitting requirements and NPDES standards for stormwater runoff, as well as adhere to city ordinances requiring the use of BMPs to control the release of potential pollutants entering storm drain systems as indicated in the city's General Plan. Impacts will be less than significant with compliance of local drainage guidelines and implementation of pollutant-related BMPs.

c.iii) Less than Significant Impact. Development of the proposed project would increase the area of impermeable surfaces on the site. As discussed in Section 4.9.c.ii above, construction of the proposed project would install new onsite water, sewer, and infiltration facilities. Flows will be diverted to two onsite proprietary underground infiltration systems that will serve as the water quality facilities that will also allow storm runoff to infiltrate into subsurface soils. The proposed Pennsylvania Avenue sewer mainline shall connect to the existing maintenance hole and flow westerly to Tennessee Street. The proposed Tennessee Street sewer mainline shall flow from Pennsylvania Avenue north to a mainline in San Bernardino Avenue (see Appendix I). All drainage plans are subject to city review and approval. As discussed in sections 4.9.a and 4.9.c.ii, BMPs would be required to be incorporated to protect water

quality. With proper maintenance of drainage facilities and adherence to BMPs, impacts would be less than significant.

c.iv) Less than Significant Impact. According to flood maps prepared by the Federal Emergency Management Agency (FEMA) and the Healthy Community Element of the city's General Plan, the project site is located in an area designated as Flood Zone "X." Zone X represents areas determined to be outside the 0.2% annual chance, and not located within a floodway, or within a 100 or 500-year floodplain.[31] The project site is currently undeveloped, vacant land, and construction operations would not impede or redirect flood flows. In addition, the proposed project would comply with city of Redlands Municipal Code Chapter 15.32 (Flood Damage Protection), which would ensure flood flows would not be impeded.[32] Impacts would be less than significant.

d) Less than Significant Impact. The city is not exposed to tsunami hazards due to its inland location. In addition, according to the California Department of Water Resources, the project site is not located in a dam inundation area.[33] There are no impacts related to tsunami or dam inundation.[34] The project site is located in Flood Zone X, representing an area determined to be outside the 0.2% annual chance. Adherence to city ordinances requiring the use of BMPs to control the release of potential pollutants would reduce the potential for the release of pollutants in the event of inundation by a flood. Impacts would be less than significant.

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

4.11 – Land Use and Planning

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☑
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☑	☐

a) No Impact. The project site encompasses one undeveloped, 13.48-acre parcel of land in the city of Redlands. The parcel is surrounded by mostly undeveloped land to the north, south and east of the project site, and is bounded by Interstate 210 to the west. This portion of the city is characterized by residential, commercial, and light industrial uses. Development of the project site would not include the reconfiguration of existing roadways and would not divide an established community. No impacts would occur.

b) Less than Significant Impact. The project includes a Specific Plan Amendment (SPA) to remove the site from East Valley Corridor Specific Plan; a Zone Change (ZC) to establish C-3 (General Commercial District) zoning for the site, a Conditional Use Permit (CUP) for the mixed use portion of the project; and a Tentative Parcel Map to subdivide the property into four lots. The Commercial Land Use Designations allow for mixed-use and residential land uses consistent with the underlying zoning district.[35] The C-3 Zoning District permits residential uses, subject to the approval of a conditional use permit; and those residences may be combined with nonresidential uses as a mixed use development, as indicated in the Redlands Code of Ordinances.[36] While the development requires a SPA and ZC for the project site, the proposed development would be subject to all land use and planning policies in the General Plan. A site design review as part of the project review process will take place and ensure compliance with all site-specific development standards, as outlined in the City's Code of Ordinances. The proposed project would not conflict with a land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As such, impacts will be less than significant.

4.12 – 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?	☐	☐	☑	☐
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☑	☐

a) Less Than Significant Impact. The California Surface Mining and Reclamation Act (SMARA) identifies and protects mineral resources within the State of California. It establishes several Mineral Resource Zones (MRZ), divisions of land containing within them various amounts of known or unknown mineral resources. The MRZ's are defined as follows: MRZ-1 are areas where no significant minerals are considered to be present, MRZ-2 are areas where mineral resources have been identified, MRZ-3 are areas of undetermined mineral resource significance, and MRZ-4 areas are of unknown mineral resource potential. According to the city's General Plan, the Santa Ana Wash, which adjoins Redlands to the north, contains high quality construction aggregates. According to the city's General Plan, the project site is entirely located within an area designated as an MRZ-2 area, suggesting that significant mineral resources may be present.[37] However, Figure 6-4 of the Vital Environment Element of the General Plan indicates that the project site is not located in an area designated by the State Mining and Geology Board as having regionally significant PCC-grade aggregate resources.[38] The project site is currently undeveloped, however it is located in an urbanized area of Redlands, with residential and commercial uses in the surrounding areas. Development of the proposed project would be in keeping with the character of the surrounding area, and would not constitute a loss of availability of a mineral resource. The project site location in an urbanized area is incompatible with mining operations, as such operation would negatively impact nearby businesses and residents. As such, development of the proposed project would not 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. Impacts would be less than significant.

b) Less than Significant Impact. Mineral resources found in and around Redlands have been deemed significant to the region and the State; however, such mineral resources identified have not been designated as locally significant to the city of Redlands. The project site is located entirely within an MRZ-2 area, of which significant mineral deposits are likely to be present. However, while project site is currently undeveloped, the surrounding area is characterized by residential and commercial uses that are incompatible with the development of any mining operations and subsequent related pollution that would take place. Development of the proposed project does not constitute a loss of mineral resources as surrounding land uses do not support mining operations. Impacts to a locally important mineral resources would be less than significant.

4.13 – Noise

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☑	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☑	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☑	☐

A *Noise and Vibration Analysis Memo* was prepared by MIG (January, 2024) to evaluate and document noise levels associated with construction and operation of the proposed project (see Appendix J). The information in this section is taken from the *Noise and Vibration Analysis Memo* for the proposed project. Additional detail regarding how noise is defined and measured can be found in Appendix J.

a) Less than Significant with Mitigation Incorporated. Existing ambient noise levels in the project area were monitored on December 12, 2023 (Appendix J). Three (3) short-term measurements were conducted to determine typical ambient noise levels in the vicinity of the project area, provide direct observations of existing noise sources at and in the vicinity of the project area, and evaluate project noise levels at nearby sensitive receptors. The three monitoring locations are described below and shown in Appendix J.

- Location ST-1 was at the central eastern portion of the project site, approximately 62 feet east of the centerline of Tennessee Street and approximately 930 feet north of the centerline of Lugonia Avenue.
- Location ST-2 was at the south central portion of the project site, approximately 435 feet east of the centerline of Tennessee Street and approximately 800 feet north of the centerline of Lugonia Avenue.
- Location ST-3 was at the central eastern of the project site, approximately 695 feet east of the centerline of Tennessee Street and approximately 980 feet north of the centerline of Lugonia Avenue.

Based on observations made during the ambient noise monitoring, the existing noise environment in the project vicinity consists primarily of vehicles on Tennessee Street and I-210. Table 13 (Measured Short-Term Ambient Noise Levels (dBA)) summarizes the results of the ambient noise monitoring.

Table 13
Measured Short-Term Ambient Noise Levels (dBA)

Monitor	Duration	Measured Noise Level		
		L_{eq}	L_{min}	L_{max}
ST-1	4 hours	70.3	61.7	96.2
ST-2	3.5 hours	62.2	57.1	72.4
ST-3	3.75 hours	60.3	54.8	75.0
Source: MIG, 2024; Appendix J.				

As shown in Table 13, measured ambient noise levels were highest along Tennessee Street (ST-1) while noise levels on the interior of the site (ST-2 and ST-3) were much lower. These noise levels indicate traffic noise levels at the site attenuate at rate of approximately 3 decibel per doubling of distance from the roadway centerline.

Construction Noise Impact Analysis

The proposed project involves construction activities including site preparation, grading, building construction, paving and architectural coating on an undeveloped parcel in an existing residential area of the city. Construction activities are anticipated to begin in 2024 and may last approximately 18 months in total. In general, construction activities would involve the use of worker vehicles, delivery trucks, dump trucks, and heavy-duty construction equipment such as (but not limited to) dozers, backhoes, tractors, loaders, graders, excavators, scrapers, welders, rollers, cranes, material lifts, generators, pavers, paving equipment, and air compressors. These types of construction activities would generate noise and vibration from the following sources:

- Heavy equipment operations at different work areas. Some heavy equipment would consist of mobile equipment such as a loader and excavator that would move around work areas; other equipment would consist of stationary equipment (e.g., cranes or material hoists/lifts) that would generally operate in a fixed location until work activities are complete. Heavy equipment generates noise from engine operation, mechanical systems, and components (e.g., fans, gears, propulsion of wheels or tracks), and other sources such as back-up alarms. Mobile equipment generally operates at different loads, or power outputs, and produces higher or lower noise levels depending on the operating load. Stationary equipment generally operates at a steady power output that produces a constant noise level.
- Vehicle trips, including worker, vendor, and haul truck trips. These trips are likely to primarily occur on Lugonia Avenue and Tennessee Street.

Typical construction equipment noise levels at different distances are shown in Table 14 (Potential Project Construction Equipment Noise Levels) below.

Table 14
Potential project Construction Equipment Noise Levels

Typical Equipment	Noise Level at 50 feet (L_{max})[A]	Percent Usage Factor[B]	Predicted Equipment Noise Levels (L_{eq})[C]						
			25 Feet	50 Feet	100 Feet	200 Feet	300 Feet	425 Feet	850 Feet
Air Compressor	80	40	82	76	70	64	56	57	44
Bulldozer	85	40	87	81	75	69	65	62	56
Backhoe	80	40	82	76	70	64	56	57	51
Compact Roller	80	20	79	73	67	61	57	54	48
Concrete Mixer	85	40	87	81	75	69	65	57	56
Crane	85	16	83	77	71	65	61	58	52
Delivery Truck	85	40	87	81	75	69	65	57	56
Excavator	85	40	87	81	75	69	65	57	56
Grader	85	40	87	81	75	69	65	57	56
Generator	82	50	85	79	73	67	66	60	54
Paver	85	50	88	82	76	70	66	63	57
Pneumatic Tools	85	50	88	82	76	70	66	63	57
Tractor	84	40	86	80	74	68	64	61	55
Scraper	85	40	87	81	75	69	65	62	56
Welder	73	40	75	69	63	57	53	50	44

Source: Caltrans, 2013 and FHWA, 2010.

(A) L_{max} noise levels based on manufacturer's specifications.

(B) Usage factor refers to the amount (percent) of time the equipment produces noise over the time period.

(C) Estimate does not account for any atmospheric or ground attenuation factors. Calculated noise levels based on Caltrans, 2013: L_{eq} (hourly) = L_{max} at 50 feet – 20log (D/50) + 10log (UF), where: L_{max} = reference L_{max} from manufacturer or other source; D = distance of interest; UF = usage fraction or fraction of time period of interest equipment is in use.

With regard to construction noise, site preparation and grading phases typically result in the highest temporary noise levels due to the use of heavy-duty equipment such as dozers, excavators, graders, tractors, scrapers, and trucks. Construction noise impacts generally occur when construction activities occur in areas immediately adjoining noise sensitive land uses, during noise sensitive times of the day, or when construction durations last over extended periods of time.

The proposed project would have a limited potential to result in construction noise impacts at existing sensitive receptor locations because the closest residential properties are located approximately 880 feet east of the project boundary. As shown in Table 14, typical construction noise levels would not exceed 57 dBA L_{eq} at a distance of approximately 850 feet. Thus, the proposed project's potential construction noise levels would be less than the measured ambient levels along Karon Street in December 2022 (Appendix J) and would not result in a significant impact at existing sensitive receptor locations on Karon Street. In addition, the proposed project would be required to comply with all applicable Municipal Code requirements pertaining to the control of construction noise, including Section 8.06.090(F) and 8.06.120(G), which limits construction activities to the hours of 7 AM to 6 PM, Monday through Saturday, with no activities taking place on Sunday or holidays and requires all equipment to include air intake silencers and exhaust mufflers in good work order.[39] These mandatory requirements would further reduce the project's less than significant construction noise levels.

The vacant land that borders the proposed project to the east (between the proposed project's eastern

boundary and Karon Street) is the site of the planned Lugonia Village residential project and subdivision, which would consist of 451 apartment units, 72 townhomes, and 18 single-family detached homes on approximately 24.4 acres of land. The Lugonia Village project is anticipated to begin construction by June 2025 and complete construction by January 2028 (see Appendix J). Based on this published schedule, the Lugonia Village project would result in adjacent sensitive residential receptors no sooner than January 2028. In contrast, the proposed project is anticipated to be constructed over an 18-month period beginning in 2024 and concluding, at latest (i.e., assuming construction begins in December 2024), by May 2026. Thus, the proposed project's construction activities would be complete before the Lugonia Village project is occupied. The proposed project, therefore, would not have the potential to impact future receptors at the Lugonia Village project.

It is noted that, based on their respective schedules, the proposed project's construction activities would combine with the Lugonia Village project's construction activities to result in a cumulative noise impact to existing sensitive receptors on Karon Street. Specifically, it could be possible for the proposed project's building construction, paving, and architectural coating phases to overlap with grading and other activities associated with the Lugonia Village project. If this were to occur, the proposed project would not result in a cumulatively considerable contribution to total construction noise levels on Karon Street because the proposed project's work activities would be located more than 850 feet from Karon Street and result in substantially lower noise levels than heavy equipment operations in the Lugonia Village project area that would be occurring much closer to Karon Street receptors.

Finally, based on their respective schedules, the proposed project may be occupied by sensitive residential receptors prior to the completion of Lugonia Village construction activities. Specifically, Lugonia Village building construction, paving, and architectural coating activities may still be occurring after May 2026, when the proposed project would be occupied. The Initial Study / Mitigated Negative Declaration (IS/MND) prepared for the Lugonia Village project included standard conditions requiring Lugonia Village construction activities to occur in accordance with the Municipal Code's allowable time periods and all construction equipment to be equipped with exhaust and air intake silencers in good working order. With implementation of these conditions, the IS/MND concluded Lugonia Village noise impacts on adjacent sensitive receptors would be less than significant.

In conclusion, the proposed project's construction activities would occur more than 850 feet away from existing sensitive receptors and would not result in significant construction noise levels at existing sensitive receptor locations. The proposed project also would not have the potential to impact future receptors in the Lugonia Village project because the Lugonia Village project is anticipated to be occupied after the proposed project is constructed. Regardless of the timing of the Lugonia Village project, the proposed project's construction activities would occur in compliance with Municipal Code limits on allowable work hours and requirements for intake and exhaust mufflers. The proposed project's construction noise levels would be less than significant.

Operational Noise Impact Analysis

(On-Site Noise Sources)

The proposed project would generate noise from human activity (e.g., use of open space areas), vehicle parking activities, garbage collection activities, landscaping activities, stationary heating, ventilation, and air conditioning (HVAC) equipment, and other residential and commercial activities (e.g., building maintenance). These new sources of noise could be audible at adjacent properties; however, the project would have a limited potential to generate significant on-site noise levels or substantially change overall noise levels in the vicinity of the project for the following reasons:

- Residential uses: Residential land uses, including high density and mixed-use residential development, are a not a substantial source of noise because:

    - Buildings and equipment are setback from front, side, and rear property lines;
    - Mechanical equipment associated with elevators, amenities (e.g., pools,) are typically enclosed within closets, sheds, or equipment rooms;
    - Heating, ventilation, and air conditioning (HVAC) equipment is typically roof mounted behind a parapet wall or screened from public view by landscaping, fences, or walls and, therefore, shielded from adjacent property lines; and
    - Residential activities are subject to the Municipal Code requirements that control and abate unnecessary, excessive, or annoying noise, including . . . .
    - Pursuant to Assembly Bill 1307, for residential projects, the effects of noise generated by project occupants and their guests on human beings is not a significant effect on the environment for the purposes of CEQA.

- Commercial uses: Ground level commercial uses would be located in the southwest corner of the project (in Building 8 and Building 10). The commercial space is intended to create a walkable environment for residents to have easy access to goods and services, as well as access to the potential commercial development to the south of the project area (between the proposed project's southern boundary and Lugonia Avenue). The commercial area would, at closest, be more than 1,300 feet away from existing sensitive receptors on Karon Street, and more than 450 feet away from future sensitive receptors associated with the Lugonia Village project to the east (between the proposed project's eastern boundary and Karon Street). In addition, residential buildings 3, 6, 7, and 9 would serve to partially or fully shield ground-level potential commercial noise from sensitive, off-site receptors to the east. Finally, the proposed project's commercial uses do not include intensive operations or features that could generate elevated exterior noise levels, such as drive-throughs with speaker boxes. The commercial area would include a gated loading dock that would be located at least 75 feet from any residential building façade and the loading dock would operate in accordance with Municipal Code Section 8.06.090(E), which prohibits loading and unloading activities between the hours of 10 PM and 6 AM or at any time in violation of the Municipal Code's general noise regulation contained in Section 8.06.030.
- Project layout: The proposed project layout generally places the housing units around the perimeter of the site, which would shield adjacent properties from noise originating on-site. For example, the courtyards would be shielded from existing and future residences to the east by the proposed project's residential buildings. Indoor common space such as the fitness center and club room would also be shielded from receptors by the project's residential buildings. The roof deck, which is located near the center of the site, would be located over 400 feet from the nearest sensitive receptors and would not generate substantial noise levels at shared property lines.

Once constructed, the proposed project's primary on-site stationary noise source would be HVAC equipment, which would be located on the roof of the project's three- and four-story buildings, at least 30 or 40 feet above the ground, respectively. HVAC units would be located on a platform in the center of each building (or building wing), with approximately one unit per tenant. Although the exact make and model of the HVAC units are unknown at this time, the type of HVAC unit anticipated to be installed is a small fan-type residential unit capable of generating noise levels between 70 and 76 dBA at a distance of three feet, depending on the type of model installed (Appendix J). A parapet wall would shield the HVAC units from adjacent property lines and increase the effective distance equipment noise must travel to reach the property line. Each building's parapet wall would provide a different level of HVAC noise attenuation due to differences in distance between the HVAC platform and the parapet

wall and the parapet wall and the adjacent property line, as well as differences in receiver, source (i.e., HVAC), and top of wall elevations. For the purposes of this analysis, only HVAC equipment noise associated with perimeter buildings adjacent to shared property lines was estimated. The proposed project's estimated HVAC unit noise levels with distance and barrier attenuation are provided in Table 15 (residential property lines) and Table 16 (commercial property lines).

Table 15
Potential HVAC System Noise Levels at Residential Property Lines

HVAC System Variable	Building 2	Building 3	Building 7
Reference HVAC Noise Level at 3 Feet	76.0 dBA L_{eq}	76.0 dBA	76.0 dBA
Distance to Residential Property Line(A)	200 Feet	90 Feet	240 Feet
Number of HVAC Units Operating	42	32	20
Estimated Total Noise Level	42.8	50.0	43.6
Residential Daytime Standard (7 AM – 10 PM)	**60 dBA L_{eq}**	**60 dBA L_{eq}**	**60 dBA L_{eq}**
Residential Nighttime Standard (10 PM – 7 AM)	**50 dBA L_{eq}**	**50 dBA L_{eq}**	**50 dBA L_{eq}**
Standards Exceeded?	**No**	**No**	**No**

Source: MIG, 2024; Appendix J.
(A) Distance is as measured from the center of the HVAC platform to the closest point on the property line.
(B) Total noise level includes attenuation with distance and shielding by parapet wall.

Table 16
Potential HVAC System Noise Levels at Commercial Property Lines

HVAC System Variable	Building 7	Building 8	Building 10
Reference HVAC Noise Level at 3 Feet	76.0 dBA L_{eq}	76.0 dBA	76.0 dBA
Distance to Residential Property Line(A)	45 Feet	30 Feet	50Feet
Number of HVAC Units Operating	20	16	24
Estimated Total Noise Level	51.3	52.5	46.9
Residential Daytime Standard (7 AM – 10 PM)	**65 dBA L_{eq}**	**65 dBA L_{eq}**	**65 dBA L_{eq}**
Residential Nighttime Standard (10 PM – 7 AM)	**60 dBA L_{eq}**	**60 dBA L_{eq}**	**60 dBA L_{eq}**
Standards Exceeded?	**No**	**No**	**No**

Source: MIG, 2024; Appendix J.
(A) Distance is measured from the center of the HVAC platform to the closest point on the property line.
(B) Total noise level includes attenuation with distance and shielding by parapet wall.

As shown in Table 15 and Table 16, the proposed project's potential HVAC noise levels would not exceed the city's daytime or nighttime noise standards for residential or commercial districts. The HVAC estimates provided in Table 15 and Table 16 are considered conservative (i.e., likely to overestimate potential noise levels) because the estimated noise levels assume all HVAC units in a given area are operating at the same time, for a full 30 minutes. In actuality, this condition is unlikely to occur. Although estimated HVAC noise levels would not exceed a city standard, Building 3 HVAC noise levels would be equal to the Municipal Code's residential nighttime standard of 50 dBA L_{eq}. To allow for potential small differences in assumed and final setback distances and building elevations, **Mitigation Measure NOI-1** is incorporated into the project to ensure Building 3 HVAC noise levels do not exceed the city's nighttime noise standard of 50 dBA L_{eq}.

The implementation of **Mitigation Measure NOI-1** would provide a minimum of 1 dBA of additional HVAC noise attenuation along the shared eastern property line and ensure that HVAC noise levels would not exceed the city's 50 dBA L_{eq} exterior nighttime noise standard, nor any other exterior noise standard (e.g., the city's 60 dBA L_{eq} daytime standard for residential properties).

The project also would not have the potential to result in noise levels that exceed the city's maximum permissible interior noise limit of 45 dBA L_{eq} for residential properties. Noise levels inside existing residential buildings would be approximately 12 dBA to 30 dBA lower than estimated exterior noise levels, depending on whether windows and doors were open or closed. Thus, potential HVAC-related interior noise levels at existing residential receptors adjacent to the project would be less than 40 dBA L_{eq} even with windows open, which is less than the city's 45 dBA L_{eq} interior noise standard.

Finally, it is noted that HVAC equipment does not operate continuously and would not affect ambient noise levels when the equipment is not in use. For these reasons, potential HVAC equipment would not generate noise levels that have the potential to exceed the 45 dBA CNEL interior noise standard established by General Plan Policy 9.0s. Furthermore, with **Mitigation Measure NOI-1,** potential HVAC noise is estimated to be less than 50.0 dBA L_{eq} when in operation, which is approximately 10 dBA less than the CNEL measured on Karon Street for the Lugonia Village project (Appendix J). The proposed project, therefore, would not substantially change noise levels in the vicinity of the project, result in incompatible noise levels at sensitive receptor locations, or otherwise result in a substantial permanent increase in ambient noise levels in the vicinity of the project (considered by General Plan Policy 9.0v to be 4 dBA if a land use compatibility threshold is exceeded or 6 dBA in any situation).

For the reasons outlined above, the proposed project would not result in a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of city standards with the incorporation of **Mitigation Measure NOI-1**. With implementation of the above mitigation measure, impacts would be less than significant.

(Off-Site Vehicle Trip Noise)
The Transportation Study Screening Analysis prepared for the proposed project indicates the project would result in a net increase of 2,704 daily vehicle trips (see Appendices L and M). Currently, there are approximately 5,058 passenger car equivalent (PCE) trips per day at the intersection of SR-210 West Bound Ramps and Tennessee Street, 4,828 PCE per day at the intersection of SR-210 East Bound Ramps and San Bernardino Avenue, 6,186 PCE trips per day at the intersection of Tennessee Street and Lugonia Avenue, and 4,162 PCE trips per day at the intersection of Tennessee Street and I-10 West Bound ramps, and 5,174 PCE trips per day at the intersection of Tennessee Street and I-10 East Bound ramps (Appendices L and M). In general, it takes a doubling of traffic to increase traffic noise volumes by 3 dBA, which is considered an audible increase for exterior noise environments by the city's General Plan (Appendix J). The addition of 2,704 passenger cars to the roadway system would not result in a doubling of traffic on any roadway segment at or in the vicinity of the project site and, therefore, would result in a less than 3 dBA increase in noise levels on local roads used to access the project site. The proposed project would not result in a substantial, permanent increase in noise levels along the roadways used to access the proposed project as compared to existing or future conditions. Therefore, this impact would be less than significant.

b) Less than Significant Impact. Construction vibration impacts generally occur when construction activities occur in close proximity to buildings and vibration-sensitive areas, during evening or nighttime hours, or when construction activities last extended periods of time. The potential for groundborne vibration is typically greatest when vibratory or large equipment such as rollers or bulldozers are operated adjacent to or in proximity of occupied buildings and structures. For the proposed project, large equipment would primarily operate during the site preparation, grading, and paving phases; however, the proposed project is currently bordered by vacant land on the east and south, with the closest existing structures being residences located 880 feet east of the project. The proposed project, therefore, does not have the potential to result in excessive groundborne vibrations at existing structures. In addition, the planned Lugonia Village residential project and subdivision is anticipated to

begin construction by June 2025 and complete construction by January 2028.[40] In contrast, the proposed project is anticipated to be constructed over an 18-month period beginning in 2024 and concluding, at latest (i.e., assuming construction begins in December 2024), by May 2026. Thus, the proposed project's site preparation, grading, and paving activities would be complete before the Lugonia Village project is constructed and occupied. The proposed project, therefore, would not have the potential to result in ground-borne vibrations during construction that could impact existing or future off-site receptors or structures. This impact would be less than significant impact.

Once operational, the proposed project would consist of a mix of residential and commercial uses that would not involve any large equipment or other operations that would generate excessive groundborne vibration levels. As such, impacts related to groundborne vibrations and noise levels would be less than significant.

c) Less than Significant Impact. The proposed project is located approximately 2.3 miles southeast of the San Bernardino International Airport. The project site is located outside of the 65 CNEL noise contour for the San Bernardino International Airport and is not located within any other airport planning boundary (SBIAA, 2019; City of Redlands, 2003).[41] The proposed project, therefore, would not expose people living or working at the site to excessive airport-related noise levels.

Mitigation Measures

NOI-1 **Reduce Potential Building 3 HVAC Noise Levels.** To reduce potential noise levels from Building 3 heating, ventilation, and air conditioning (HVAC) equipment:

1. The installation of HVAC units or systems that generate a noise level greater than 75 dBA (at 3 feet) for units located within 90 lateral feet of the project's eastern property line shall be prohibited; or

2. Parapet walls for any building with an HVAC unit or system within 90 feet of the project's eastern property line shall be at least 1 foot taller than the top of the tallest installed HVAC unit.

4.14 – 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)?	☐	☐	☑	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☑

a) Less than Significant Impact. The project would directly induce population growth in the area with the development of new multi-family housing. As outlined in "Table 4-4: Residential Buildout (2035)" of the Livable Community Element of the Redlands General Plan, potential buildout of multi-family residential within the city, outside of the Transit Village, is projected at 374 units by 2035.[42] Furthermore, future development of commercial buildout outside within the city and outside of the Transit Village is projected at 2,889,357 square-feet by 2035.[43] These numbers do not include projects that were under construction, entitled, or in the planning stage when the General Plan was written. The table additionally estimates a population growth from total future buildout, including multi-family residential, of 10,964 people.

The project as proposed includes development of 460 new apartment units and approximately 17,899 square feet of commercial space. Eight of the proposed buildings would exclusively serve as residential uses, while the remaining two buildings would serve mixed-uses that incorporate ground-floor commercial space with residential units on the floors above (see Exhibit 5, Project Elevations). The project also proposes a Specific Plan Amendment (SPA) to remove the site from East Valley Corridor Specific Plan; Zone Change (ZC) to establish C-3 (General Commercial District) zoning for the site, Conditional Use Permit (CUP) for the mixed use portion of the project; and Tentative Parcel Map to subdivide the property into four lots. Per the Redlands Code of Ordinances (18.92.080) the residential density permitted within the C-3 zoning district is R-3 (multi-family residential district). The R-3 residential zoning district allows for high density residential apartments, at a density of 1,450 square feet of lot area per dwelling unit.[44] The 12.79-acre (557,132.4 square-foot) project would therefore support a density of 384 du/ac. As part of the project proposal, approximately 5% of the proposed residential units would be designated as "very low-income" units spread throughout the site, allowing for a 20 percent density bonus in accordance with the "California Density Bonus Law". The 20% density bonus would allow for the possible addition of another 76 dwelling units. As such, the proposed 460 apartments as proposed would not exceed the city's R-3 zoning district's maximum density.

Using an average of 2.91 persons per household (from a current population of 73,849 divided by 25,319 households in Redlands) the proposed 460 apartments would house approximately 1,339 persons.[45] Furthermore, this increase in units and potential population growth would not represent substantial

unplanned growth that cannot be handled by the city's existing utilities and service providers. As discussed in Section 4.18 (Public Services), payment of development impact fees by the proposed project would offset incremental increases in demand for services such as fire protection, police protection, schools, parks and recreation facilities, and other public services such as libraries. Additionally, the potential increase in population growth would be within the SCAG 2020 RTP/SCS growth projections for the City of Redlands (i.e., an increase of 11,300 residents between 2016 and 2045).[46] Therefore, the proposed project would not exceed regional growth assumptions, and as such, impacts would be less than significant.

b) No Impact. The project site is currently undeveloped. No housing would be displaced as a result of project development and as such there would be no impacts.

4.15 – Public Services

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

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

a) Less than Significant Impact. The project is located in the service area of the City of Redlands Fire Department. The Fire Department responds to medical emergencies, hazardous materials incidents, rescue calls, and motor-related accidents, in addition to regular fire suppression services. There are four stations in Redlands[47]:

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

The nearest fire station to the project site is Station 263, located approximately one mile directly east of the project site off Pennsylvania Avenue. The project may create an incremental increase in demand for fire services. To offset any incremental demand in fire protection and emergency medical services, development impact fees are collected at the time of building permit issuance for approved projects. The project as proposed is a mixed-use development that will incorporate 460 multi-family residential units with approximately 17,899 square feet of commercial space. developments and commercial. Fees would be charged at a rate of $528.21 per multi-family dwelling unit, and $69.89 per 1,000 square feet of commercial space, and would go towards fire facilities and staffing.[48] Impacts related to expansion of fire protection services would be less than significant with payment of fees.

b) Less than Significant Impact. The project area is served by the Redlands Police Department. The Police Department and Patrol building is located at 1270 W Park Ave, Building C, Redlands, CA 92373. The station is approximately 1 mile south of the project site. Development of the project may generate an incremental increase in the need for police protection in the project area. The Police Department reviews its needs on a yearly basis and adjusts service levels as needed to maintain an adequate level of public protection. To offset an incremental increase in police services, development impact fees will

be collected at the time of building permit issuance. Fees would be charged at a current rate of $27.56 per multi-family dwelling unit and $3.65 per 1,000 square feet of commercial building area.[49] Fees would go towards law enforcement facilities and staffing, and as such, would offset any impacts from development of the proposed project. Impacts will be less than significant.

c) Less than Significant Impact. The project proposes construction of a mixed-use development incorporating 460 apartment units with approximately 17,899 square feet of commercial space, and is anticipated to lead to a population growth of approximately 1,339 persons (See Threshold 4.14a above). This growth will most likely have a direct growth on the student population of the Redlands Unified School District. To offset this impact, payment of development impact fees towards the cost of increased demand of school district facilities is required under State law. The Redlands Unified School District has established a school fee and charge a current rate of $4.79 per square foot of "assessable space" (space within the perimeter of a residential structure) within new residential construction.[50] Additionally, the District charges a rate of $0.78 per square foot of commercial/industrial space.[51] Payment of these development impact fees would offset any project impacts on school facilities. As such, impacts would be less than significant.

d) Less than Significant Impact. Development of the project could have the potential to impact demand for parks and recreation facilities as it is anticipated to have a direct impact on the growth of the city's population. However, development impact fees collected at the time of building permit issuance would offset any impacts of development on the utilization of local park services. The city has established Open Space and Parks Fees going to those facilities and the project would be charged at a current rate of $3,624.62 per multi-family dwelling.[52] Less than significant impacts would occur with payment of fees.

e) Less than Significant Impact. The project is expected to result in an increase in residents, who may generate an additional demand for public facilities such as libraries. However, the development of the proposed dwelling units is in line with the region's future growth and buildout. Payment of required development impact fees determined by the City of Redlands would offset the cost of increased demand for such facilities in the future. Fees for public facilities would be charged at a current rate of $628.33 per multi-family residential dwelling unit, and $83.13 per 1,000 square feet of commercial building area.[53] Potential impacts to public facilities in Redlands would be less than significant with payment of fees.

4.16 – Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☑	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☑

a) Less than Significant Impact. The project involves the development of 460 multi-family apartments units, as well as approximately 17,899 square feet of commercial space, and associated landscaping and roadway improvements. Texonia Park is a 10.7-acre neighborhood park located approximately 0.7 miles east of the project site. The park includes a lighted soccer field and basketball courts, as well as picnic and playground facilities.[54] Development of the proposed project may lead to an increased use of the park due to the anticipated population increase associated with the project. However, the project proposes several amenities for future residents. The project proposes a 30-foot by 73-foot pool and a 19-foot by 24-foot spa to be located in the courtyard of Building 9. Building 9 is also proposed to feature a golf simulator, theater, and yoga and fitness centers. Use of these facilities would reduce any exacerbation of current local recreational areas. Additionally, Development Impact Fees collected at the time of building permit issuance would help to offset any incremental impacts of development on the utilization of local park services. The city has established Open Space and Parks Fees at a current rate of $3,624.62 per multi-family dwelling.[55] The proposed project will lead to a population increase in the area, however, this increase would not induce unforeseen stress on the city's local or regional parks. The proposed project would not increase the use of local recreational resources to such a substantial amount that would lead to their accelerated physical deterioration. Impacts would be less than significant.

b) No Impact. The project does not include the construction of recreational facilities which might have an adverse physical impact on the environment. No impacts will occur.

4.17 – Transportation

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☑	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☑	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☑	☐
d) Result in inadequate emergency access?	☐	☐	☑	☐

A *Measure U Growth Management Analysis* dated October 12, 2023 (see Appendix K) and a *Vehicle Miles Traveled Screening Analysis* (VMT Study) dated March 21, 2024 (see Appendix L) were prepared for the proposed project by Translutions. The information presented below is provided from the aforementioned evaluations provided in Appendices K and L.

a) Less than Significant Impact. The *Measure U Growth Management Analysis* was prepared to calculate the project's trip generation and evaluate the potential for transportation impacts resulting from the development of the proposed project in the context of the City of Redlands's discretionary authority for conformance with locally established operational standards – specifically Measure U policies (which are largely based on Level of Service (LOS) standards that measure traffic congestion). The *Vehicle Miles Traveled Screening Analysis* was prepared to determine whether the proposed project meets the vehicle miles traveled (VMT) requirements for the San Bernardino County Transportation Authority (SBCTA) Guidelines and screens out from needing to conduct a detailed VMT analysis. CEQA Guidelines section 15064.3(A) states that VMT is the most appropriate measure for transportation impacts, and LOS shall not be considered an environmental impact and "a project's effect on automobile delay shall not constitute a significant environmental impact" (for CEQA purposes).

Project Trip Generation

Table 17 (Proposed Project Trip Generation) shows the estimated trip generation for the proposed project based on trip generation rates collected from the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021). As shown in Table 17, the proposed project is forecast to generate a total of approximately 2,704 new daily trips, including 195 trips during the AM peak hour and 245 trips during the PM peak hour.

Table 17
Proposed Project Trip Generation

Land Use	Dwelling Units / Square Footage	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total	
Residential (Multifamily Housing – Low-Rise)[1] Trip Generation Rates	135 DU	0.10	0.30	0.40	0.32	0.19	0.51	6.74
Trip Generation		13	41	54	43	26	69	910
Internal Trips		(1)	(1)	(2)	(3)	(2)	(5)	(80)
Net Trip Generation		12	40	52	40	24	64	830
Residential (Multifamily Housing – Mid-Rise)[2] Trip Generation Rates	325 DU	0.09	0.28	0.37	0.24	0.15	0.39	4.54
Trip Generation		28	92	120	77	50	127	1,476
Internal Trips		(1)	(1)	(2)	(6)	(5)	(11)	(131)
Net Trip Generation		27	91	118	71	45	116	1,345
Retail (Strip Retail Plaza (<40k))[3] Trip Generation Rates	17.764 TSF	1.42	0.94	2.36	3.30	3.30	6.59	54.45
Trip Generation		25	17	42	59	59	118	967
Internal Trips		0	0	0	(4)	(6)	(10)	(86)
Net Trip Generation		25	17	42	55	53	108	881
Pass By Rate[4]				40%			40%	40%
Pass By Trips		(8)	(9)	(17)	(21)	(22)	(43)	(352)
Net After Pass-By		17	8	25	34	31	65	529
Total Project Trips		**56**	**139**	**195**	**145**	**100**	**245**	**2,704**

Source: Translutions, 2023.
1 - Trip generation based on rates for Land Use 220 - "Multifamily Housing (Low-Rise)" from Institute of Transportation Engineers' (ITE) Trip Generation (11th Edition).
2 - Trip generation based on rates for Land Use 221 - "Multifamily Housing (Mid-Rise)" from Institute of Transportation Engineers' (ITE) Trip Generation (11th Edition).
3- Trip generation based on rates for Land Use 822 - "Strip Retail Plaza(<40k)" from Institute of Transportation Engineers' (ITE) Trip Generation (11th Edition).
4 - Daily Pass-by rates for Land Use 822 (Strip Retail Plaza) are based on pass-by rates for Land Use 821 (Shopping Plaza) from ITE Trip Generation (11th Edition). Rates for a.m.peak hour and daily are assumed to be same as p.m. peak hour rate.

Conflicts with Redlands Measure U

Measure U was an initiative approved by the voters of Redlands in 1997 to enact several principles of managed development within the City of Redlands. The principles in Measure U have been incorporated throughout the new 2035 General Plan, as well as several sections of the Redlands Municipal Code. The *Measure U Growth Management Analysis* evaluated the project using the applicable Measure U Policies identified in the Connected City Element of the City of Redlands 2035 General Plan as well as the County of San Bernardino Transportation Impact Study Guidelines (TIS Guidelines). The Measure U Policies are largely based on Level of Service (LOS) standards that measure traffic congestion. A detailed LOS evaluation is included in the *Measure U Growth Management Analysis* (See Appendix K) in order to demonstrate project compliance with Measure U. As shown in Table 18 below, all study areas intersections are currently operating at satisfactory levels of service, with the exception of the following:

- Tennessee Street and Lugonia (am and pm peak hours)
- Tennessee Street and Redlands Avenue (am and pm peak hours)

The existing "with project levels of service" for the study area intersections are summarized in Table 18 below as well. As shown below, all study areas intersections are forecast to operate at satisfactory levels of service, with the exception of the following:

- Tennessee Street and Lugonia (am and pm peak hours)
- Tennessee Street and Redlands Avenue (am and pm peak hours)

Table 18
Existing Without and With Project Levels of Service

Intersection	Jurisdiction	LOS Standard	Control	Without Project				With Project			
				AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
				Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
SR-210 EB Ramps/San Bernardino Ave.	Caltrans	D	Signal	38.6	D	39.4	D	39.9	D	40.3	D
SR-210 WB Ramps-Tennessee ST/San Bernardino	Caltrans	D	Signal	42.7	D	49.6	D	43	D	49.8	D
Tennessee St/Pennsylvania Ave	Redlands	C	TWSC	Future Intersection				13.6	B	16.1	C
Tennessee St/ DWY 1	Redlands	C	TWSC	Future Intersection				15.8	C	21.9	C
Tennessee St/ Lugonia Ave	Redlands	C	Signal	42.9	D*	52.7	D*	43.5	D*	53.7	D*
Tennessee St/ I-10 WB Ramps	Caltrans	D	Signal	17.4	B	19.4	B	16.6	B	22.2	C
Tennessee St/ I-10 EB Ramps	Caltrans	D	Signal	30.3	C	37.0	D	30.1	C	38.3	D
Tennessee St/ Colton Ave	Redlands	C	Signal	22.5	C	34.6	C	22.5	C	34.6	C
Tennessee St/ Redlands Ave	Redlands	C	Signal	48	D*	50.1	D*	48	D*	50.1	D*

Notes:
LOS = Level of Service
TWSC = Two-Way Stop Control; For TWSC intersections, reported delay is for worst-case movement

Based on Measure U guidelines, where the current LOS at a location within the city is below the LOS standard C, no development project shall be approved that cannot be mitigated so that it does not reduce the existing LOS at that location. Table 18 above demonstrates that, while the intersection of Tennessee Street and Redlands Ave. operates at unsatisfactory LOS D under both "without and with" project conditions, the project does not increase the intersection delay. Therefore, no improvements are recommended at that intersection.

Additionally, the city requires circulation improvements if the study area intersections do not meet Measure U guidelines. Signal cycle length improvements are recommended for the intersection of Tennessee Street and Lugonia Avenue. Table 19 below shows that with the addition of improvements, the intersection delay would be reduced to pre-project conditions.

Table 19
Existing With Project Improvements Levels of Service

Intersection	Jurisdiction	LOS Standard	Control	Without Project				With Project			
				AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
				Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
Tennessee St/ Lugonia Ave	Redlands	C	Signal	43.5	D	53.7	D	39.8	D	50.6	D

As discussed above, the project does not result in a drop in LOS at any intersection and therefore would not cause the LOS to drop below Measure U standards. As shown in the *Measure U Growth Management Analysis,* all study area intersections are forecast to operate at satisfactory levels of service, except for the intersections of Tennessee Street and Lugonia Avenue and Tennessee Street and Redlands Avenue. There is no increase in intersection delay at the latter intersection, and with the addition of circulation improvements, delays at Tennessee Street and Lugonia Avenue are reduced to pre-project conditions. As such, the project would not result in any unsatisfactory LOS; therefore, the project would be in compliance with Measure U, no mitigation is required, and impacts would be less than significant.

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

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

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

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

<u>Screening Criteria 1 –Transit Priority Area (TPA) Screening</u>
Projects located within a TPA, defined as within one-half mile of a major transit stop or high-quality transit corridor, may be presumed to result in a less than significant VMT impact absent substantial evidence to the contrary. This presumption may not apply, however, if the project:

1. Has a Floor Area Ratio (FAR) of less than 0.75.

2. Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking)
3. Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the jurisdiction with input from the Metropolitan Planning Organization): or
4. Replaces affordable residential units with a smaller number of moderate or high-income residential units.

According to Figure 1 of the VMT Study (Appendix L) conducted for the project, the project site is not located within a TPA, and therefore this screening criteria does not apply to the proposed project.

Screening Criteria 2 – Low VMT Screening Area

Residential and office projects located within a low VMT generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary. In addition, other employment-related and mixed-use land use projects may qualify for the use of screening if the project can reasonably be expected to generate VMT per resident, per worker, or per service population (residential plus employment) that is similar to the existing land uses in the low VMT area.

As prescribed in the City VMT Guidelines, the SBCTA VMT Screening Tool was used to assess low VMT area screening for the project, as well as the city's threshold of 15% below the County regional average VMT per service population. The SBCTA VMT Screening Tool utilizes county travel forecasting models to measure VMT performance for individual jurisdiction and for individual traffic analysis zones (TAZ) within the SBCTA region. TAZs are geographic polygons similar to census block groups used to represent areas of homogenous travel behavior.

Total daily VMT per service population was estimated for the TAZ encompassing the project area. The VMT for project TAZ is 24.9 miles and the County VMT is 32 miles (Figure 2, Appendix L). The TAZ VMT is 22.15% lower than the County's VMT, and meets the County's threshold of 15% below County regional average (28.4 VMT per service population). As such, the project is located within a low VMT generating TAZ, and the project is presumed to have a less than significant impact on VMT.

Screening Criteria 3 – Project Type Screening

Some project types have been identified as having the presumption of a less than significant impact as they are local serving by nature, or they are small enough to not warrant assessment. Local serving retail projects with stores less than 50,000 square feet may be presumed to have a less than significant impact absent substantial evidence to the contrary. Local serving retail generally improves the convenience of shopping close to home and has the effect of reducing vehicle travel. In addition to local serving retail, the following uses can also be presumed to have a less than significant impact absent substantial evidence to the contrary as their uses are local serving in nature:

- Local-serving K-12 schools
- Local Parks
- Day care centers
- Local-serving gas stations
- Local-serving banks
- Local-serving hotels (e.g., non-destination hotels)
- Student housing projects on or adjacent to a college campus
- Local-serving assembly uses (places of worship, community organizations)
- Community institutions (public libraries, fires stations, local government)
- Local-serving community colleges that are consistent with the assumptions noted in the RTP/SCS

- Affordable or supportive housing
- Assisted living facilities
- Senior housing (as defined by HUD)
- Projects which generate less than 3,000 MTCO2e per year can be presumed to have a less than significant impact on VMT. Projects which generate less than 3,000 MTCO2e per year5 include the following:
    - Single-family residential – 167 dwelling units or fewer
    - Multi-family residential (1-2 stories) – 232 dwelling units or fewer
    - Multi-family residential (3+ stories) – 299 dwelling units or fewer
    - Office – 59,100 square feet or less
    - Local-serving retail center – 112,400 square feet or less (no stores larger than 50,000 square feet)
    - Warehousing – 463,400 square feet or less
    - Light industrial – 74,600 square feet or less

The project as proposed includes the development of 460 multi-family dwellings in 3 to 4 story buildings and approximately 17,899 square feet of commercial space. The project is not included in the above listed project types, and therefore the Project Type Screening does not apply to the proposed project.

Conclusion

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

c) Less than Significant Impact. A significant impact would occur if the proposed project substantially increased an existing hazardous design feature or introduced incompatible uses to the existing traffic pattern. There are three points of entry into the project: one entry point off Tennessee Street, one entry point off Pennsylvania Avenue, and one entry point at the future commercial development proposed to the south. Approximately 764 total parking spaces will be available onsite through a combination of underground, garage, outdoor-covered, outdoor-uncovered, and commercial parking spaces throughout the project. Access to above ground parking will be available through aisles, akin to driveways, connected to the three project entry points. Those entry points, as well as turns within the project site, will be designed to accommodate the inner (20 feet) and outer (40 feet) turning radius for fire vehicles. The project does not involve any changes to the alignment or uses of existing roadways, and the proposed project is consistent with City of Redlands driveway spacing and design requirements. Construction operations occurring on site would comply with the California Building Code adopted in the City of Redlands Municipal Code.[56] The proposed project would not result in a traffic safety hazard due to any design features, and impacts would be less than significant.

d) Less than Significant Impact. A significant impact would occur if the design of the proposed project would not satisfy emergency access requirements of the City of Redlands Fire Department or in any other way threaten the ability of emergency vehicles to access and serve the project site or adjacent uses. As outlined above, entry ways and aisle turns within the proposed project are designed to accommodate the inner and outer turn radii of fire vehicles, so as to allow adequate access for emergency services throughout the project site. As previously discussed above, access within the project site would be provided aisles accessible via the three entry points. Entry Point 1 via Tennessee Street will be divided by median with ornamental landscaping. The road on each side of the median will be 16 feet wide. Entry Points 2 and 3, connecting the future southern commercial development and Pennsylvania Avenue respectively, will each be 30 feet wide. The streets' width is sufficient to provide

access to fire and emergency vehicles and is consistent with California Fire Code requirements. All access features are subject to and must satisfy the City of Redlands design and the Fire Department's requirements. The project would not result in adverse impacts with regard to emergency access, and impacts would be less than significant.

4.18 – Tribal Cultural Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a Cultural Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☐	☐	☑
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☑	☐	☐

a.i) No Impact. A significant impact would occur if the proposed project would cause a substantial adverse change in the significance of a tribal cultural resource listed or eligible for listing in the California Resources of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). A field survey and records search was conducted as part of the Cultural Resources Report (Report) (see Appendix D) and identified one cultural resource within the project area: a concrete and brick water conveyance system consisting of two north-south water channels, two concrete rectangular vaults, and two standpipe features. This irrigation system, however, is not considered a "historical resource" per the Report, is not eligible for listing in the California Register of Historical Resources, and is not listed on any Certified Local Government historic property register. While the city has several historic landmarks and sites listed under its historic preservation program as defined in Public Resources Code Section 5020.1(k), the proposed project site is completely

undeveloped and there are no buildings, structures, or features on the site that could be listed as a "historical resource." The project site was formerly used for agricultural purposes and is not known to be associated with an important historical period or important persons from the past. The project would not have any physical impacts outside the designated project area boundary. Therefore, the project would not result in any adverse change in the significance of a historical resource as defined in Public Resources Code Section 5020.1(k). No impact would occur.

a.ii) Less than Significant with Mitigation Incorporated. Government Code §§ 65352.3 and 65562.5 (SB 18); and Public Resources Code §§ 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3 (AB 52) provide that a project that may cause a substantial adverse change to a defined Tribal Cultural Resource (TCR) can result in a significant effect on the environment. SB18 requires public notice to be sent to tribes listed on the Native American Heritage Commission's SB18 Tribal Consultation list within the geographical areas affected by the proposed changes. Tribes must respond to a local government notice within 90 days (unless a shorter time frame has been agreed upon by the tribe), indicating whether or not they want to consult with the local government. Consultations are for the purpose of preserving or mitigating impacts to places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code that may be affected by the proposed adoption or amendment to a general or specific plan. The Lead Agency is required to notify tribes within 14 days of deeming a development application complete subject to CEQA to notify the requesting tribe as an invitation to consult on the project.

AB 52 identifies examples of mitigation measures that would avoid or minimize impacts to TCR. The bill makes the above provisions applicable to projects that have a notice of preparation or a notice of intent to adopt a negative declaration/mitigated negative declaration circulated on or after July 1, 2015. Although there is no indication of TCRs at the project site, AB 52 is clear in stating that it is the responsibility of the Public Agency (i.e., Lead Agency) to consult with Native American tribes early in the CEQA process to allow tribal governments, lead agencies, and project proponents to discuss the appropriate level of environment review, identify and address potential adverse impacts to TCRs, and reduce the potential for delay and conflict in the environmental review process (see Public Resources Code Section 2108.3.2). Specifically, government-to-government consultation may provide "tribal knowledge" of the project area that can be used in identifying TCRs that cannot be obtained through other investigative means. Pursuant to AB 52, as the CEQA Lead Agency, the city of Redlands sent consultation notification letters on March 9th, 2023 to tribes identified by the NAHC as having a historic or cultural connection to the project area. Of the contacted tribes, the representatives of the following tribes responded:

- Agua Caliente Band of Cahuilla Indians
- Augustine Band of Cahuilla Mission Indians
- Gabrieleno Band of Mission Indians – Kizh Nation
- Morongo Band of Mission Indians
- Quechan Tribe of the Fort Yuma Reservation
- Rincon Band of Luiseno Indians

Of those tribes who responded, only the Agua Caliente Band of Cahuilla Indians (ACBCI) and the Morongo Band of Mission Indians (MBMI) requested specific actions be taken by the Lead Agency as part of project development. As the project site is located within the ACBCI's Traditional Use Area, they requested the following actions be taken:

- A records search conducted at the appropriate California Historical Resources Information System (CHRIS) center with at least a 1.0-mile search radius from the project boundary. If this

work has already been completed, please furnish copies of the reports and site records generated through this search so that we can compare these with our records to begin productive consultation.

- Tribal participation during survey and testing if this fieldwork has not already taken place. In the event that archaeological crews have completed this work, our office requests a copy of the Phase I study or other cultural assessments as soon as available.

A records search was conducted using CHRIS as part of the *Cultural Resources Inventory and Evaluation Report* prepared by Ecorp Consulting Inc. Pursuant to AB 52, the city will provide the requested items to ACBCI as well as incorporate mitigation measures requested by MBMI, as described below. The other four respondent tribes had no comment on the project as proposed at the time of notification. The city has not been presented with any information or evidence regarding the presence or likelihood of any TCR occurring on or near the project site. Implementation of **Mitigation Measures TCR-1** through **TCR-8**, as requested by MBMI, will reduce potentially significant impacts to previously undiscovered TCRs to less than significant by providing for monitoring during grading and construction of the project. With implementation of **Mitigation Measures TCR-1** through **TCR-8,** impacts would be less than significant with regards to resources of potential importance to California Native American tribes.

Mitigation Measures

TCR-1 **Native American Treatment Agreement.** Prior to the issuance of grading permits, the Applicant shall enter into a Tribal Monitoring Agreement with the Consulting Tribe(s) for the Project. The Tribal Monitor 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 to allow identification, evaluation, and potential recovery of cultural resources.

TCR -2 **Retention of Archaeologist.** Prior to any ground-disturbing activities (including, but not limited to, clearing, grubbing, tree and bush removal, grading, trenching, fence post replacement and removal, construction excavation, excavation for all utility and irrigation lines, and landscaping phases of any kind), and prior to the issuance of grading permits, the Applicant shall retain a qualified archaeologist who meets the U.S. Secretary of the Interior Standards (SOI). The archaeologist shall be present during all ground-disturbing activities to identify any known or suspected archaeological and/or cultural resources. The archaeologist shall conduct a Cultural Resource Sensitivity Training, in conjunction with the Tribe[s] Tribal Historic Preservation Officer (THPO), and/or designated Tribal Representative. The training session shall focus on the archaeological and tribal cultural resources that may be encountered during ground-disturbing activities as well as the procedures to be followed in such an event.

TCR -3 **Cultural Resource Management Plan.** Prior to any ground-disturbing activities the Project archaeologist shall develop a Cultural Resource Management Plan (CRMP) and/or Archaeological Monitoring and Treatment Plan (AMTP) to address the details, timing, and responsibilities of all archaeological and cultural resource activities that occur on the Project site. This Plan shall be written in consultation with the Consulting Tribe(s) and shall include the following: approved Mitigation Measures (MM)/Conditions of

Approval (COA), contact information for all pertinent parties, parties' responsibilities, procedures for each MM or COA, and an overview of the Project schedule.

TCR -4 **Pre-Grade Meeting.** The retained qualified archeologist and Consulting Tribe(s) representative shall attend the pre-grade meeting with the grading contractors to explain and coordinate the requirements of the monitoring plan.

TCR -5 **On-Site Monitoring.** During all ground-disturbing activities the qualified archaeologist and the Native American monitor shall be on-site full-time. The frequency of inspections shall depend on the rate of excavation, the materials excavated, and any discoveries of Tribal Cultural Resources as defined in California Public Resources Code Section 21074. Archaeological and Native American monitoring will be discontinued when the depth of grading and the soil conditions no longer retain the potential to contain cultural deposits. The qualified archaeologist, in consultation with the Native American monitor, shall be responsible for determining the duration and frequency of monitoring.

TCR -6 **Inadvertent Discovery of Cultural Resources.** In the event that previously unidentified cultural resources are unearthed during construction, the qualified archaeologist and the Native American 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. 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 Native American 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 Native American 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:

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 **Inadvertent Discovery of Human Remains.** The Consulting Tribe(s) requests the following specific conditions to be imposed in order to protect Native American human remains and/or cremations. No photographs are to be taken except by the coroner, with written approval by the Consulting Tribe(s).

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 Public Resources Code (PRC) § 5097.98.

B. In the event that the human remains and/or cremations are identified as Native American, the Coroner shall notify the Native American Heritage Commission within 24 hours of determination pursuant to subdivision (c) of HSC §7050.5.

C. The Native American Heritage Commission shall immediately notify the person or persons it believes to be the Most Likely Descendant (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.

D. If the Morongo Band of Mission Indians has been named the Most Likely Descendant (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 shall 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 shall be determined by the Tribe's Most Likely Descendant (MLD), the landowner, and the City Planning Department.

TCR -8 **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 City and Consulting Tribe(s) for review and comment. After approval of all parties, the final reports shall be submitted to the Eastern Information Center, and the Consulting Tribe(s).

4.19 – Utilities and Service Systems

Would the project:

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

a) Less than Significant Impact. The Redlands Municipal Utilities Department oversees some 21,500 metered connections and approximately 400 miles of pipelines that delivers water throughout its service area that includes Redlands, Mentone, parts of Crafton Hills, San Timoteo Canyon, and San Bernardino. The Department receives its water from a mix of sources including local groundwater wells, the Mill Creek Watershed, Santa Ana Watershed, and imported water provided through the State Water Project (SWP). The city owns 15 domestic wells and receives water from an additional two wells owned by the South Mountain Water Company.[57] Furthermore, the city operates both the Tate and Hinkley surface water treatment plants (WTPs), both of which provide treated water from the Mill Creek and Santa Ana watersheds, respectively. Both WTPs treat water from the SWP when required. The city

maintains ownership in multiple local private and mutual water companies to bolster and secure reliable water supplies for their treatment plants. Wastewater is collected and treated at the Redlands Wastewater Treatment Facility and has a treatment capacity of 9.5 million gallons.[58]

As discussed in Section 4.9 (Hydrology and Water Quality), as the project site is currently undeveloped, the project will require the construction of new onsite water, sewer, and stormwater drainage facilities onsite that would connect to the existing infrastructure in the surrounding streets. The project will comply with local drainage guidelines and implement various pollutant-related BMPs that will reduce the chances of substantial runoff accumulating. According to the Preliminary Water Quality Management Plan (WQMP) (see Appendix G) prepared for the project, the project has two drainage areas that will convey stormwater west of the site to an onsite pump system that will flow to Tennessee Street, as it does in the existing condition prior to project development (See Appendix H). Landscaping improvements and BMPs would mitigate any increase in surface runoff due to the expansion of new impermeable surfaces on site. Additionally, standard connection fees would address any incremental impacts of the project. The project would therefore result in a less than significant impact in relation to new or expanded water supply and wastewater treatment facilities.

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

b) Less than Significant Impact. According to the *2020 Integrated Regional Urban Water Management Plan* (*UWMP*) for the Upper Santa Ana River Watershed Region, the city of Redlands is projected to have a total demand of 25,818 acre-feet (AF) in 2025.[59] The same estimates calculated a supply total of 31,039 AF in 2020, a difference of 5,221 AF. The Urban Water Management Plan anticipates an overall increase in demand associated with the continued development of Redlands over 2015 conditions. Development of the proposed project is anticipated to result in operational water demand of approximately 20,489,165 million gallons per year, or approximately 62 AFY. Therefore, the project would not substantially deplete water supplies, and the project would have a less than significant impact on entitled water supplies.

c) Less than Significant Impact. Impacts could be potentially significant as a result of project development if it is determined by the wastewater treatment provider that the project does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. As outlined above in Sections 4.19.a and 4.19.b, the project can be adequately served by existing wastewater treatment facilities. Impacts would be less than significant.

d) Less than Significant Impact. Significant impacts could occur if solid waste generated by the proposed project exceeds the existing permitted landfill capacity or violates federal, state, and local statutes and regulations. Solid waste disposal services are overseen by the City of Redlands Trash Collection. Solid waste collected in Redlands is primarily transferred to the San Timoteo Landfill in Redlands, located approximately 4 miles south of the project site. According to CalRecycle, the San Timoteo Landfill has a maximum capacity of 23,685,785 tons, with a remaining capacity of 12,360,396 tons measured April 30th, 2019.[60] Construction of the project is estimated to generate approximately 3,139 pounds of solid waste per dwelling unit per year, and 4,745 pounds per 1000 square feet of commercial space per year.[61] This would result in a total of approximately 1,528,870 pounds, or approximately 764 tons, of solid waste per year. There would be adequate landfill capacity in the area to accommodate project-generated waste. The project is therefore not expected to generate solid waste

in excess of the capacity of local infrastructure. Impacts related to solid waste disposal capacity would be less than significant.

e) No Impact. The proposed project is required to comply with all applicable federal, state, County, and city statutes and regulations related to solid waste. Therefore, no impact would occur.

4.20 – Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☑
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☑
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☑
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☑

a) No Impact. The project site is not located within a State Responsibility Areas (SRA). The nearest SRA area is located approximately 3.5 miles south of the project site near the San Timoteo Canyon.[62] While the project site is currently undeveloped, the site has been routinely disturbed and is located in an urbanized area surrounded by commercial and residential uses. The city's General Plan identifies several evacuation routes out of the city; these routes were previously designated as potential evacuation routes in the 2007 San Bernardino General Plan.[63] These include: Interstates 10, 15, 210, and 215, and State Highways 30, 60, 66, 71, and 83. In the event of an earthquake, the following roads would provide safe access out of the San Bernardino Valley, as indicated by Caltrans and cited in the Redlands General Plan:

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

While the project is located adjacent to I-210, its development would not impact the availability of the route, or the other identified highways and roadways as evacuation routes. The project would not substantially impair any adopted or informal emergency response plan or evacuation plan. No impacts would occur.

b) No Impact. The project site is not located within a fire hazard zone, as identified on the Very High Fire Hazard Severity Zone (VHFHSZ) maps prepared by the California Department of Forestry and Fire Protection (CALFIRE).[64] The nearest VHFHSZ is located approximately three miles south of the project site adjacent to the Redlands Community Hospital. The project site is located in an urbanized area that is relatively flat. Therefore, the project would not exacerbate wildfire risks, thereby exposing occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No impact would occur.

c) No Impact. The project site is not located within or near a State Responsibility Areas as indicated in Threshold 4.19.a above. Development of the proposed project would involve the construction of two driveways and access roadways within the development providing access throughout as well as in and out of the proposed development. The installation of utility connections to the new mixed-use development would also be required to provide water, heating, and electricity to residents. Such project improvements would not exacerbate fire risk or would result in a temporary or ongoing impact from wildfires. Construction of the project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk, or that may result in temporary or ongoing impacts to the environment. No impact would occur.

d) No Impact. The project site is not located within or near any State Responsibility Areas. As described in Threshold 4.9.c.iv above, the project site is located in an area not considered at risk of flood or inundation. According to Figure 7-3: Flood Hazards, of the Healthy Community Element of the city's General Plan, the project site is not located within a floodway, or within a 100 or 500-year floodplain.[65] Additionally, the project site is not located in a dam inundation area.[66] The project site is located in a relatively flat area, with little to no potential for landslides or downstream flooding or runoff. If the project stie were to experience a flooding event, the city's General Plan includes strategies to mitigate potential impacts from flooding. Development of the proposed project would not exacerbate risks to people from flooding or landslides, and as such, no impacts would occur.

4.21 – 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?	☐	☑	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable?	☐	☑	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☑	☐	☐

a) Less than Significant with Mitigation Incorporated. The proposed project would not substantially impact any scenic vistas, scenic resources, or the visual character of the area, as discussed in Section 4.1, and would not result in excessive light or glare. The project site is located within a developed area with no natural habitat. The proposed project would not significantly impact any sensitive plants, plant communities, fish, wildlife, or habitat for any sensitive species. Impacts to burrowing owl and nesting birds would be less than significant with adherence to existing regulations and incorporation of **Mitigation Measures BIO-1** and **BIO-2**. There are no jurisdictional waters on the project site. Impacts to archaeological resources, buried human remains, and Tribal Cultural Resources would be reduced to less than significant with implementation of **Mitigation Measures CUL-1** and **TCR-1** through **TCR-8**. Based on the preceding analysis of potential impacts in the responses to items 4.1 through 4.20, no evidence is presented that this proposed project would degrade the quality of the environment. Impacts related to degradation of the environment would be less than significant with incorporation of mitigation measures.

b) Less than Significant with Mitigation Incorporated. Cumulative impacts can result from the interactions of environmental changes resulting from one proposed project with changes resulting from other past, present, and future projects that affect the same resources, utilities and infrastructure systems, public services, transportation network elements, air basin, watershed, or other physical conditions. Such impacts could be short-term and temporary, usually consisting of overlapping construction impacts, as well as long-term, due to the permanent land-use changes and operational

characteristics involved with the proposed project. Cumulative impacts would be less than significant, as further discussed herein.

Aesthetics

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

Agricultural Resources

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

Air Quality

The analysis provided in Section 4.3 found that impacts would be less than significant. Therefore, the project would not contribute to cumulatively considerable air quality impacts.

Biological Resources

The analysis provided in Section 4.4 found that no individual impacts to sensitive species or migratory birds would occur with implementation of **Mitigation Measures BIO-**1 and **BIO-2**; therefore, the project would not contribute considerably to regional impacts on such species, and impacts would be less than significant. The analysis also found that the project would have no other impacts on biological resources and would not result in localized or regional cumulative impacts, and as such, impacts would be less than significant.

Cultural Resources

The analysis provided in Section 4.5 found that impacts to archaeological resources and buried human remains would be less than significant with incorporation of **Mitigation Measures CUL-1**. Therefore, the project would not contribute to cumulatively considerable cultural resources impacts.

Energy

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

Geology and Soils

Impacts related to geology at the project-level have no potential for cumulative impacts. Therefore, the proposed project would have no contribution to potential geological or soil degradation or other such impacts. The analysis in section 4.7 found that if during construction operations, paleontological resources are discovered, **Mitigation Measure GEO-1** would establish proper care and attention to such discoveries. Therefore, the project would not contribute to cumulative paleontological resources impacts.

Greenhouse Gas Emissions

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

Hazardous Materials

The analysis provided in Section 4.9 related to hazards and hazardous materials found that impacts would be less than significant. Additionally, compliance with all regulations related to the disposal and storage of household hazardous waste would ensure that impacts would be less than significant.

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

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

Noise
The analysis provided in Section 4.13 found that impacts related to the construction and operation of the proposed project would be less than significant with incorporation of **Mitigation Measures NOI-1**. Therefore, the project would not contribute considerably to cumulative noise impacts.

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

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

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

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

Tribal Cultural Resources
The analysis provided in Section 4.18 related to Tribal Cultural Resources found that impacts would be less than significant with adherence to **Mitigation Measures TCR-1** through **TCR-8**.

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

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

c) Less than Significant with Mitigation Incorporated. The proposed project would not have environmental effects which would cause substantial adverse effects on humans, either directly or indirectly, as noted in the previous sections above, except as it related to operational noise impacts from HVAC units on Building 3. However, potential noise impacts from HVAC units would be reduced to less than significant with incorporation of mitigation.

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BIO-1 **Pre-construction Survey for Nesting Birds.** To the extent feasible, construction activities should be scheduled to avoid the nesting season. If construction activities are scheduled to take place outside the nesting season, all impacts to nesting birds protected under the MBTA and California Fish and Game Code would be avoided. The nesting season for most birds in San Bernardino County extends from February 1 through September 1.

If it is not possible to schedule construction activities between September 1 and January 31, then pre-construction surveys for nesting birds will be conducted by a qualified biologist to ensure that no nests would be disturbed during project implementation. These surveys will be conducted no more than 5 days prior to the initiation of any site disturbance activities and equipment mobilization, vegetation removal, fence installation, grading, etc. If project activities are delayed by more than 5 days, an additional nesting bird survey will be performed. During this survey, the biologist will inspect all vegetation and other potential nesting habitats (e.g., shrubs) in and immediately adjacent to the impact area for nests. Active nesting is present if a bird is building a nest, sitting in a nest, a nest has eggs or chicks in it, or adults are observed carrying food to the nest. The results of the surveys will be documented.

If an active nest is found sufficiently close to work areas to be disturbed by these activities, the qualified biologist will determine the extent of a construction-free buffer zone to be established around the nest (typically up to 300 feet for raptors and up to 100 feet for other species), to ensure that no nests of species protected by the MBTA and California Fish and Game Code will be disturbed during project implementation. Within the buffer zone, no site disturbance and mobilization of heavy equipment, including but not limited to equipment staging, fence installation, clearing, grubbing, vegetation removal, demolition, and grading will be permitted until the chicks have fledged.

A qualified biologist is an individual who has a degree in biological sciences or related resource management with a minimum of two seasonal years post-degree experience conducting surveys for nesting birds. During or following academic training, the qualified biologist will have achieved a high level of professional experience and knowledge in biological sciences and special-status species identification, ecology, and habitat requirements.

BIO-2: **Pre-construction Survey for Burrowing Owl.** No more than 14 days prior to ground disturbance a focused survey for burrowing owl will be required to ensure take avoidance. Even though burrowing owls were not located as part of the general biological survey, a pre-construction survey for burrowing owl is required because burrowing owls may encroach or migrate to the property at any time, and therefore steps should be taken to ensure avoidance, including reevaluating the locations/presence of burrowing owl or burrows. Pre-construction surveys shall be conducted in accordance with the survey requirements outlined in Appendix D of the CDFW's Staff Report on Burrowing Owl, dated March 7, 2012. If burrowing owl are found on the project site during pre-construction surveys, the biologist conducting surveys shall immediately contact the CDFW to develop a plan for avoidance and/or translocation prior to construction crews initiating any ground disturbance on the project site.

CUL-1: If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:

- If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately and no agency notifications are required.

- If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, the archaeologist shall immediately notify the lead agencies. The agencies shall consult on a finding of eligibility and implement appropriate treatment measures, if the find is determined to be a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines or a historic property under Section 106 NHPA, if applicable. Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the site either: 1) is not a Historical Resource under CEQA or a Historic Property under Section 106; or 2) that the treatment measures have been completed to their satisfaction.

If the find includes human remains, or remains that are potentially human, they shall ensure reasonable protection measures are taken to protect the discovery from disturbance (AB 2641). The archaeologist shall notify the San Bernardino County Coroner (per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California PRC, and AB 2641 will be implemented. If the coroner determines the remains are Native American and not the result of a crime scene, the coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the Project (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (§ 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (§ 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.

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

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

NOI-1 **Reduce Potential Building 3 HVAC Noise Levels.** To reduce potential noise levels from Building 3 heating, ventilation, and air conditioning (HVAC) equipment:

1. The installation of HVAC units or systems that generate a noise level greater than 75 dBA (at 3 feet) for units located within 90 lateral feet of the project's eastern property line shall be prohibited; or

2. Parapet walls for any building with an HVAC unit or system within 90 feet of the project's eastern property line shall be at least 1 foot taller than the top of the tallest installed HVAC unit.

TCR-1 **Native American Treatment Agreement.** Prior to the issuance of grading permits, the Applicant shall enter into a Tribal Monitoring Agreement with the Consulting Tribe(s) for the Project. The Tribal Monitor 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 to allow identification, evaluation, and potential recovery of cultural resources.

TCR-2 **Retention of Archaeologist.** Prior to any ground-disturbing activities (including, but not limited to, clearing, grubbing, tree and bush removal, grading, trenching, fence post replacement and removal, construction excavation, excavation for all utility and irrigation lines, and landscaping phases of any kind), and prior to the issuance of grading permits, the Applicant shall retain a qualified archaeologist who meets the U.S. Secretary of the Interior Standards (SOI). The archaeologist shall be present during all ground-disturbing activities to identify any known or suspected archaeological and/or cultural resources. The archaeologist shall conduct a Cultural Resource Sensitivity Training, in conjunction with the Tribe[s] Tribal Historic Preservation Officer (THPO), and/or designated Tribal Representative. The training session shall focus on the archaeological and tribal cultural resources that may be encountered during ground-disturbing activities as well as the procedures to be followed in such an event.

TCR -3 **Cultural Resource Management Plan.** Prior to any ground-disturbing activities the Project archaeologist shall develop a Cultural Resource Management Plan (CRMP) and/or Archaeological Monitoring and Treatment Plan (AMTP) to address the details, timing, and responsibilities of all archaeological and cultural resource activities that occur on the Project site. This Plan shall be written in consultation with the Consulting Tribe(s) and shall include the following: approved Mitigation Measures (MM)/Conditions of Approval (COA), contact information for all pertinent parties, parties' responsibilities, procedures for each MM or COA, and an overview of the Project schedule.

TCR -4 **Pre-Grade Meeting.** The retained qualified archeologist and Consulting Tribe(s) representative shall attend the pre-grade meeting with the grading contractors to explain and coordinate the requirements of the monitoring plan.

TCR -5 **On-Site Monitoring.** During all ground-disturbing activities the qualified archaeologist and the Native American monitor shall be on-site full-time. The frequency of inspections shall depend on the rate of excavation, the materials excavated, and any discoveries of Tribal Cultural Resources as defined in California Public Resources Code Section 21074. Archaeological and Native American monitoring will be discontinued when the depth of grading and the soil conditions no longer retain the potential to contain cultural deposits. The qualified archaeologist, in consultation with the Native American monitor, shall be responsible for determining the duration and frequency of monitoring.

TCR -6 **Inadvertent Discovery of Cultural Resources.** In the event that previously unidentified cultural resources are unearthed during construction, the qualified archaeologist and the Native American 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. 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 Native American 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 Native American 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:

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 **Inadvertent Discovery of Human Remains.** The Consulting Tribe(s) requests the following specific conditions to be imposed in order to protect Native American human remains and/or cremations. No photographs are to be taken except by the coroner, with written approval by the Consulting Tribe(s).

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 Public Resources Code (PRC) § 5097.98.

B. In the event that the human remains and/or cremations are identified as Native American, the Coroner shall notify the Native American Heritage Commission within 24 hours of determination pursuant to subdivision (c) of HSC §7050.5.

C. The Native American Heritage Commission shall immediately notify the person or persons it believes to be the Most Likely Descendant (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.

D. If the Morongo Band of Mission Indians has been named the Most Likely Descendant (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 shall 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 shall be determined by the Tribe's Most Likely Descendant (MLD), the landowner, and the City Planning Department.

TCR-8 **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 City and Consulting Tribe(s) for review and comment. After approval of all parties, the final reports shall be submitted to the Eastern Information Center, and the Consulting Tribe(s).

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6 References

6.1 – List of Preparers

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6.2 – Persons and Organizations Consulted

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