2.0 RESPONSE TO COMMENTS

During the public review period, comment letters were received on the IS/MND from interested public agencies, organizations, and individuals. The following is a list of commenters on the IS/MND during the public review period.

Comment Letter No.	Person, Firm, or Agency	Letter Dated
1	Agua Caliente Band of Mission Indians, Lacy Padilla, Archaeologist, Tribal Historic Preservation Office.	May 28, 2021
2	County of San Bernardino, Department of Public Works, Michael R. Perry, Supervising Planner, Environmental Management	June 21, 2021
3	Fort Yuma Quechan Indians, H. Jill McCormick M.A., Quechan Indian Historic Preservation Officer	June 2, 2021
4	South Coast Air Quality Management District, Lijin Sun, J.D., Program, CEQA IGR, Planning Rule Development and Area Sources	June 15, 2021
5	California Department of Conservation Division of Land Resource Protection, Monique Wilber, Conservation Program Support Supervisor	June 7, 2021

Minor revisions have been made to the text of the Draft IS/MND in response to comments received during the public review period and are included in the Comments and Responses. In accordance with Section 15073.5 of the CEQA Guidelines, a lead agency is required to recirculate a Draft IS/MND when the document must be substantially revised after public notice of its availability has previously been given. A substantial revision is either: a new, avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance; or the lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significance and new measures or revisions must be required.

Recirculation is not required if (1) mitigation measures are replaced with equal or more effective measures; (2) new project revisions are added in response to written or verbal comments on the project's effects identified in the proposed negative declaration which are not new avoidable significant effects; (3) measures or conditions of project approval are added after circulation of the Draft IS/MND which are not required by CEQA, which do not create new significant environmental effects and are not necessary to mitigate an avoidable significant effect; or (4) new information is added to the Draft IS/MND which merely clarifies, amplifies, or makes insignificant modifications to the Draft IS/MND.

Revisions of the Draft IS/MND have been made to clarify the relationship of the project to the future Santa Ana River Trail. None of the revisions made to the Draft IS/MND constitute a substantial revision to the project that would require recirculation.

All revisions to the Draft IS/MND are done with new text <u>double-underlined</u>, and deleted text ~~stricken through~~. Refer to Section 3.0, *Errata*, of this Final IS/MND.

Although the CEQA Guidelines do not require a lead agency to prepare written responses to comments received on an IS/MND (see CEQA Guidelines Section 15088), the City of Redlands has elected to prepare the following written responses with the intent of conducting a comprehensive and meaningful evaluation of the proposed project. The number designations in the responses are correlated to the bracketed and identified portions of each comment letter.

Page 1 of 1
Comment Letter 1
Agua Caliente Band of Mission Indians

AGUA CALIENTE BAND OF CAHUILLA INDIANS

TRIBAL HISTORIC PRESERVATION

03-027-2020-002

May 28, 2021

[VIA EMAIL TO:sreilly@cityofredlands.org]
City of Redlands
Mr. Sean Reilly
35 Cajon Street/ P.O. Box 3005
Redlands, CA 92373

Re: Bergamot Specific Plan

Dear Mr. Sean Reilly,

The Agua Caliente Band of Cahuilla Indians (ACBCI) appreciates your efforts to include the Tribal Historic Preservation Office (THPO) in the Citrus Valley Specific Plan project. The project area is not located within the boundaries of the ACBCI Reservation. However, it is within the Tribe's Traditional Use Area. For this reason, the ACBCI THPO requests the following:

> *At this time the concerns of the ACBCI THPO have been addressed and proper mitigation measures have been proposed to ensure the protection of tribal cultural resouces. This letter shall conclude our consultation efforts under SB 18.

1-1

Again, the Agua Caliente appreciates your interest in our cultural heritage. If you have questions or require additional information, please call me at (760)699-6956. You may also email me at ACBCI-THPO@aguacaliente.net.

Cordially,

Lacy Padilla
Archaeologist
Tribal Historic Preservation Office
AGUA CALIENTE BAND
OF CAHUILLA INDIANS

5401 DINAH SHORE DRIVE, PALM SPRINGS, CA 92264
T 760/699/6800 F 760/699/6924 WWW.AGUACALIENTE-NSN.GOV

Response No. 1

1-1 The comment provides a conclusory statement in that tribal concerns have been addressed with proper mitigation measures to ensure protection of tribal cultural resources. As described in Section 17, *Tribal Cultural Resources*, Mitigation Measures TCR-1 (Tribal Monitoring), TCR-2 (Discovery Securing), and TCR-3 (Treatment and Deposition OF Discovery) provide for a sufficient level of protocol to be implemented during project construction all in accordance with California Public Resources Code 21074 and 5024.1.

County of San Bernardino, Department of Public Works
Page 1 of 2
Comment Letter 2

Main Office - 825 East Third Street, San Bernardino, CA 92415-0835 | Phone: 909.387.7910 Fax: 909.387.7911
www.SBCounty.gov

SAN BERNARDINO COUNTY

Department of Public Works
- Flood Control
- Operations
- Solid Waste Management
- Special Districts
- Surveyor
- Transportation

Brendon Biggs, M.S., P.E.
Director

David Doublet, M.S., P.E.
Assistant Director

June 25, 2021 File: 10(ENV)-4.01

City of Redlands
Planning Division
Attn: Sean Reilly, Senior Planner
P.O. Box 3005
35 Cajon Street, Suite 20
Redlands, CA 92373
sreilly@cityofredlands.org

Transmitted Via Email

RE: CEQA – NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION FOR THE BERGAMOT SPECIFIC PLAN

Dear Mr. Reilly:

Thank you for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. **We received this request on June 1, 2021** and pursuant to our review, we have the following comments:

Transportation & Design Division (Mervat Mikhail, Chief, 909-387-7940):

1. The San Bernardino County Department of Public Works in conjunction with the Regional Parks Department currently have alignment plans under the County's Active Transportation Plan for the Santa Ana River Trail (SART) Phase IV Reach A from California Street in San Bernardino to Orange Street Redlands. The SART's current alignment travels east west along Domestic Ave. adjacent to the southerly boarder of the proposed residential development Project. The Initial Study should adequately discuss how the proposed Project's adjacency would not conflict or result in substantial adverse physical impact to public services provided by the County's Active Transportation Plan and the Santa Ana River Trail prior to certification or adoption. 2-1

2. The County's SART plan proposes using Domestic Ave. and Texas Street for Class II/III bike lanes from the western boundary of the proposed development to eastern boundary at Texas Street, then the SART will turn north on Texas Street to its northern terminus. The Initial Study's Traffic Analysis does not describe how improvements of Domestic Ave. and Texas Street will incorporate the planned bike lanes. Specifically, Section 3.3 of the Traffic Analysis and Exhibit 3-7 City of Redlands General Plan Bicycle Facilities does not depict the SART alignment accurately. The Initial Study and supporting Traffic Analysis should acknowledge the County's Active Transportation Plan and proposed Santa Ana River Trail; the current alignment of the SART should be accurately portrayed in exhibits; and identify how the proposed development will incorporate the proposed SART into the proposed development and avoid conflicts with the proposed SART, prior to the adoption or certification of the environmental documents. 2-2

BOARD OF SUPERVISORS
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Leonard X. Hernandez Chief Executive Officer

Page 2 of 2
Comment Letter 2

3. The Initial Study mentions there will be future connection to the Santa Ana River Trail. The Initial Study does not describe how or where those connections will occur. The Initial Study should include a thorough description of any proposed connectivity to the SART and identify potential impacts and mitigation for the impacts prior to certification or adoption. 2-3

We respectfully request to be included on the circulation list for all project notices, public reviews, or public hearings. In closing, I would like to thank you again for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. Should you have any questions or need additional clarification, please contact the individuals who provided the specific comment, as listed above.

Sincerely,

Michael Perry

MICHAEL R. PERRY
Supervising Planner
Environmental Management

MP:AJ:nl

Response No. 2

2-1 The commenter describes the Regional Parks Department's current alignment plans along the Santa Ana River Trail (SART) and recommends for the Initial Study to describe how the project's adjacency to the SART would not conflict with or result in a substantial physical impacts to public services provided for by the County's Active Transportation Plan and the Santa Ana River Trail, all prior to certification or adoption of the Initial Study.

As shown in Exhibit 3-7 of the Traffic Analysis (*City of Redlands General Plan Bicycle Facilities*), bicycle route configurations, prior to and after General Plan approval in 2017, did not include the County's current alignment of the SART. The General Plan, a conceptual long range planning document, depicted only the existing and conceptual trails that were available at the time the General Plan was approved.

The County's current alignment of the SART proposes using Domestic Avenue and Texas Street for Class II/III bike lanes from the western boundary of the project to intersection of Domestic Avenue and Texas Street. The SART will then turn north on Texas Street to its northern terminus. The proposed project would implement the planned SART as a class III bike lane within Domestic Avenue and Texas Street as planned by the County. Drafted cross sections of Texas Street and Domestic Avenue, confirm this improvement to be constructed as a part of the project. In addition, the project has been conditioned to provide appropriate signage and striping to visually identify the bike lane. Trails within the project would access Domestic Avenue at the southern portion of the public park and would provide trail users with access to the Class III bike lane. All impacts related to the construction of project roadways or trails within the project have been analyzed within the IS/MND. Because the project is implementing the County plan for the SART, no conflicts are anticipated.

2-2 The commenter provides a further description of the how the SART extends northward along Texas Street, and questions why the project proposed street improvements do not include the incorporation of the Class II/III bike lane for Texas Street (Please refer to Response 2-1 above). The commenter also notes that Exhibit 3-7, *City of Redlands General Plan Bicycle Facilities*, of the Traffic Analysis, does not depict the SART alignment accurately. Newly drafted cross sections, in response to the County's comments, of Texas Street and Domestic Avenue, have been included in the project plans.

2-3 The commenter noted that the Initial Study did not describe how and where the project would provide future connections to the SART (Please refer to Response 2-1 above).

Fort Yuma Quechan Indians
Page 1 of 1
Comment Letter 3

From: Quechan Historic Preservation Officer
To: Sean Reilly
Subject: Intent to Adopt a Mitigated Negative Declaration - Beramot Specific Plan - Tentative Tract Map No. 20336
Date: Wednesday, June 02, 2021 7:09:52 AM

This email is to inform you that we have no comments on this project. We defer to the more local Tribes and support their decisions on the project. 3-1

Thank you,
H. Jill McCormick, M.A.

Quechan Indian Tribe
Historic Preservation Officer
P.O. Box 1899
Yuma, AZ 85366-1899
Office: 760-572-2423
Cell: 928-261-0254
E-mail: historicpreservation@quechantribe.com

Response No. 3

3-1 The commenter states that the Fort Yuma Quechan Indians have no comments on the project and defers to more localized Tribes and to support their decisions on the project. The comment is noted; no further response is necessary.

South Coast Air Quality Management District
Page 1 of 2
Comment Letter 4

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL: June 15, 2021
sreilly@cityofredlands.org
Sean Reilly, Senior Planner
City of Redlands, Planning Division
P.O. Box 3005
Redlands, California 92373

Mitigated Negative Declaration (MND) for the Proposed Bergamot Specific Plan

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments on the CEQA air quality analysis and health risk reduction strategies should be considered by the City of Redlands (Lead Agency) and included the Final MND. 4-1

The Lead Agency proposes to build 317 residential units and a 15.49-acre park on 58.64 acres (Proposed Project). The Proposed Project is located on the northwest corner of Domestic Avenue and Texas Street in the City of Redlands. 4-2

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants and include schools, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. The Proposed Project will include, among others, 317 residential units and is located in close proximity to State Route 210, and to facilitate the purpose of a MND as an informational document, it is recommended that the Lead Agency perform a mobile source health risk assessment[1] to disclose the potential health risks[2] in the Final MND. 4-3

Many strategies are available to reduce exposures, including, but are not limited to, building filtration systems with MERV 13 or better, or in some cases, MERV 15 or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Enhanced filtration units are capable of reducing exposures. However, enhanced filtration systems have limitations. For example, in a study that South Coast AQMD conducted to investigate filters3, a cost burden is expected to be within the range of $120 to $240 per year to replace each filter panel. The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary and include costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy 4-4

[1] South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis.
[2] *Ibid.*
[3] This study evaluated filters rated MERV 13 or better. Accessed at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf. Also see 2012 Peer Review Journal article by South Coast AQMD: https://onlinelibrary.wiley.com/doi/10.1111/ina.12013.

South Coast Air Quality Management District
Page 2 of 2
Comment Letter 4

Sean Reilly June 15, 2021

consumption that the Lead Agency should evaluate in the Final MND. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters have no ability to filter out any toxic gases. Furthermore, when used filters are replaced, replacement has the potential to result in emissions from the transportation of used filters at disposal sites and generate solid waste that the Lead Agency should evaluate in the Final MND. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to diesel particulate matter emissions. 4-4

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project. 4-5

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at lsun@aqmd.gov, should you have any questions.

Sincerely,
Lijin Sun
Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS
SBC210601-01
Control Number

Response No. 4

4-1 The comment is a general introduction in referring to the letter's forwarding comments to be considered in regard to the CEQA Air Quality Analysis and consideration of implementation of health risk reduction strategies for incorporation into the Final IS/MND. The comment is noted; no further response is necessary.

4-2 The commenter provides a brief summarization of the project description and location. The comment is noted; no further response is necessary.

4-3 The commenter discusses the definition of sensitive receptors, describes the project's location as close in proximity to State Route 210 and recommends that the Lead Agency perform a mobile source health risk assessment to disclose potential risks in the Final MND. Due to close proximity State Route210 and to nearby light industrial warehouse facilities to the west, a Diesel Emissions Health Risk Assessment (Refer to Appendix A2) was performed to analyzes such impacts onto sensitive receptors in regard to diesel particulate matter (DPM) and toxic air contaminants (TAC). The report summarized that through project implementation of 2019 California Code of Regulations Title 24, Part 6 standards in requiring installation of positive static pressure forced air HVAC systems equipped with MERV 13 filters would be adequate to reduce cancer and non-cancer (acute and chronic) risks from DPM to within acceptable levels as defined by the SCAQMD. Therefore, no further analysis or additional health risk assessment is required in this regard.

4-4 The commenter recommends for the project to incorporate MERV 13 air filters into development of all residential homes in the project. The MERV 13 air filter is a Project Design Feature that was already proposed and included as part of the project plans. To ensure installation, the MERV 13 air filter will be verified by the City upon plan check prior to building permit issuance. Text to the Final Draft Initial Study (Refer to Section 3.c., Air Quality), has been revised to include this Project Design Feature.

4-5 The comment is a general informational request for the Lead Agency to provide SCAQMD with any comments received during the public review process. The comment is noted, whereby the Lead Agency is in contact with and in forwarding comments to SCAQMD once received.

California Department of Conservation
Page 1 of 3
Comment Letter 5

California
Department of Conservation
Division of Land Resource Protection

Gavin Newsom, Governor
David Shabazian, Director

JUNE 7, 2021

VIA EMAIL: SREILLY@CITYOFREDLANDS.ORG
City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
P.O. Box 3005
Redlands, CA 92373

Dear Mr. Reilly:

MITIGATED NEGATIVE DECLARATION FOR THE BERGAMOT SPECIFIC PLAN PROJECT, SCH# 2021050600

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Mitigated Negative Declaration for the Bergamot Specific Plan Project (Project). The Division monitors farmland conversion on a statewide basis, provides technical assistance regarding the Williamson Act, and administers various agricultural land conservation programs. We offer the following comments and recommendations with respect to the project's potential impacts on agricultural land and resources. 5-1

Project Description

The project consists of both land use changes and physical improvements that would result in the establishment of 317 single-family dwellings across three neighborhood concepts, communal open space, a new public park, and public improvements to the adjacent right-of-way.

Land use changes proposed by the project would remove the project area from the East Valley Corridor Specific Plan (EVCSP). Presently, the project site is zoned Science Research Park in the EVCSP, which is inconsistent with the General Plan. The project proposes removing the site from the EVCSP and establishing a new specific plan consistent with the existing general plan land use of Low Density Residential. The project is located in the northwest portion of the City of Redlands in San Bernardino County, and encompasses approximately 58 acres. 5-2

The project site is currently designated as Prime Farmland by the Department of Conservation's Farmland Mapping and Monitoring Program.[1]

[1] California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, https://maps.conservation.ca.gov/DLRP/CIFF/

State of California Natural Resources Agency | Department of Conservation
801 K Street, MS 14-15, Sacramento, CA 95814
conservation.ca.gov | T: (916) 324-0850 | F: (916) 327-3430

California Department of Conservation
Page 2 of 3
Comment Letter 5

Department Comments

Although conversion of agricultural land is often an unavoidable impact under CEQA analysis, feasible alternatives and/or feasible mitigation measures must be considered. In some cases, the argument is made that mitigation cannot reduce impacts to below the level of significance because agricultural land will still be converted by the project, and therefore, mitigation is not required. However, reduction to a level below significance is not a criterion for mitigation under CEQA. Rather, the criterion is feasible mitigation that lessens a project's impacts. As stated in CEQA statue, mitigation may also include, "Compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements."[2]

The conversion of agricultural land represents a permanent reduction in the State's agricultural land resources. As such, the Department advises the use of permanent agricultural conservation easements on land of at least equal quality and size as partial compensation for the loss of agricultural land. Conservation easements are an available mitigation tool and considered a standard practice in many areas of the State. The Department highlights conservation easements because of their acceptance and use by lead agencies as an appropriate mitigation measure under CEQA and because it follows an established rationale similar to that of wildlife habitat mitigation. 5-3

Mitigation via agricultural conservation easements can be implemented by at least two alternative approaches: the outright purchase of easements or the donation of mitigation fees to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural conservation easements. The conversion of agricultural land should be deemed an impact of at least regional significance. Hence, the search for replacement lands should not be limited strictly to lands within the project's surrounding area.

A source that has proven helpful for regional and statewide agricultural mitigation banks is the California Council of Land Trusts. They provide helpful insight into farmland mitigation policies and implementation strategies, including a guidebook with model policies and a model local ordinance. The guidebook can be found at:

http://www.calandtrusts.org/resources/conserving-californias-harvest/

Of course, the use of conservation easements is only one form of mitigation that should be considered. Any other feasible mitigation measures should also be considered.

[2] Public Resources Code Section 15370, Association of Environmental Professionals, 2020 CEQA, California Environmental Quality Act, Statute & Guidelines, page 284, https://www.califaep.org/docs/2020_ceqa_book.pdf

California Department of Conservation
Page 3 of 3
Comment Letter 5

Conclusion

Thank you for giving us the opportunity to comment on the Mitigated Negative Declaration for the Bergamot Specific Plan Project. Please provide this Department with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Associate Environmental Planner via email at Farl.Grundy@conservation.ca.gov. 5-4

Sincerely,

Monique Wilber

Monique Wilber
Conservation Program Support Supervisor

Response No. 5

5-1 The comment is a general introduction in referring to the letter's forwarding comments to be considered in regard to the project's potential impacts on agricultural land resources. The comment is noted; no further response is necessary.

5-2 The commenter summarizes the project site's current land use, the proposed land use and of the project site currently located in an area designated as Prime Farmland by the Department of Conservation's Farmland Mapping and Monitoring Program. The comment is noted; no further response is necessary.

5-3 The commenter noted that the conversion of agricultural land represents a permanent reduction and significant impact to California's agricultural land resources and advises the use of permanent agricultural conservation easements on land of at least equal quality and size as partial compensation for the loss of agricultural land. The commenter further notes that conservation easements can be implemented by the following two alternatives:

1. Outright purchase of easements or,
2. The donation of mitigation fees to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural conservation easements.

The commenter further recommends the contacting of California Council of Land Trusts as a source in providing helpful insight into farmland mitigation policies.

As stated in Section 2.a. of the Draft IS/MND, the loss of prime farmland at the site was evaluated in the 2035 General Plan EIR in the larger context of the General Plan. The site is one of many locations identified in the General Plan EIR as having prime farmland and farmland of statewide importance that would be converted to non-agricultural use. The City adopted the findings and a Statement of Overriding Considerations that stated even with the self-mitigating policies of the General Plan, which are intended to help reduce impacts, there would still be significant and unavoidable impacts.

Although the project site is designated as Prime Farmland and Farmland of Statewide Importance, impacts would be less than significant because the project is consistent with the General Plan 2035 and the East Valley Corridor Specific Plan in that both have incorporated potential impacts to agriculture resources into their respective analyses (General Plan EIR and East Valley Corridor Specific Plan EIR). A zone change is proposed as part of the project to remove the project site from the East Valley Corridor Specific Plan (EVCSP) zoning designation and create the Bergamot Specific Plan, which would allow for the proposed new residential uses on the project site. The project site has an existing land use designation of Low Density Residential (LDR), hence the change of zone would bring the land use designation and zoning into conformance with each other.

Although the project site is designated as Prime Farmland, the General Plan however, designates the project site as LDR and is not contemplated by the General Plan to return the site to back to an agricultural use. Therefore, the proposed zoning would be consistent with the current LDR land use. As a result, there are no changes in the General Plan land use that would create new impacts to farmland when considered in

contrast with the present land use of the project site. There is no new information or change of circumstances, other than the proposed change of zone for creation of the Bergamot Specific Plan, that would result in a new significant impact, or an increase in the severity of the significant and unavoidable impact associated with conversion of Prime Farmland to non-agricultural uses than was previously disclosed in the General Plan EIR.

In conclusion, conversion of Prime Farmland at the project site was previously analyzed in the 2035 General Plan EIR and findings and a Statement of Overriding Considerations were adopted identifying the significant and unavoidable impacts on farmland conversion. Because there is no new information or circumstances that would result in a more severe significant impact than previously considered, no further analysis or mitigation is warranted, and the impact of the proposed project remains less than significant.

5-4 The comment is conclusionary statement in requesting for the Lead Agency to provide the commenter's agency with notices of any future hearing dates and staff reports in pertinence with the project and provides contact information. The comment is noted; no further response is necessary.

3.0 ERRATA

This Errata is being provided for inclusion in this Final IS/MND in order to incorporate minor text revisions into the Draft IS/MND, as noted below. A double underline indicates additions to the text and a ~~strikethrough~~ indicates deletions to the text. These changes to the Draft IS/MND do not affect the overall conclusions of the environmental document. The changes are listed by page and paragraph.
These minor corrections to the Draft IS/MND does not constitute "significant new information" pursuant to CEQA Guidelines Section 15088.5. As a result, a recirculation of the Draft IS/MND is not required.

Draft IS/MND Section B.a., *Project Summary*
Page 8

Land use changes proposed by the project would remove the project area from the East Valley Corridor Specific Plan (EVCSP). The General Plan identifies the project site as Low Density Residential, which accommodates residential uses at a density of up to 6 dwelling units per acre. Presently, the project site is zoned Science Research Park in the EVCSP, which is inconsistent with the General Plan. The project proposes removing the site from the EVCSP and establishing a new specific plan consistent with the existing general plan land use of Low Density Residential.
Specific actions necessary for project approval include the following:

- Adoption of the project Initial Study / Mitigated Negative Declaration
- Adoption of the project Socio-economic cost benefit study
- Approval of Specific Plan Amendment No. 46 to Specific Plan No. 40
- Approval of Specific Plan No. 64
- Approval of Tentative Tract Map No. 20336
- Approval of Commission Review and Approval No. 922

Draft IS/MND Section B.d., *Proposed Improvements*
Page 11

- Roadways
    - Texas Street is currently fully dedicated (66-foot right of way) north of Domestic Avenue. A portion, approximately 445 feet north of Domestic Avenue, has been constructed as a half street along the easterly roadway frontage. The remaining half street will be improved along the westerly edge of the roadway to its existing terminus. Beyond its current terminus, Texas Street would be extended and improved with a minimum of 32 feet of pavement northerly to the intersection of the future proposed Street N. This will also include the designation of a Class II/III bike lane to serve as part of the County's current alignment plan for the Santa Ana Regional Tail (SART) route (See Section 17.a, *Transportation* for further detail).

Draft IS/MND Section B.d., *Proposed Improvements*
Page 12

- Domestic Avenue currently consist of an unimproved 40-foot right-of way. The project would fully dedicate and improve the full 62-foot right-of-way from Texas Street to the public park with curb and gutters, sidewalks, a Class II/III bike lane (to serve as part of County's current alignment plan for the SART route), and pavement.

Draft IS/MND Section C, 8. Description of Project
Page 21

Development of 317 single-family residences with associated utilities, infrastructure, open space and recreational areas on approximately 58.64 acres; Specific Plan Amendment (remove the site from the East Valley Corridor Specific Plan); new Specific Plan (residential development, with applicable development standards); and Tentative Tract Map (subdivision for a new residential tract). Specific actions necessary for project approval include the following:

- Adoption of the project Initial Study / Mitigated Negative Declaration
- Adoption of the project Socio-economic cost benefit study
- Approval of Specific Plan Amendment No. 46 to Specific Plan No. 40
- Approval of Specific Plan No. 64
- Approval of Tentative Tract Map No. 20336
- Approval of Commission Review and Approval No. 922

Draft IS/MND Section 3.c., *Air Quality*
Page 44

Acute Health Impacts

Acute health effects are characterized by sudden and severe exposure and rapid absorption of a TAC. Normally, a single large exposure is involved. Acute health effects are often treatable and reversible. The acute hazard index is calculated from the maximum 24-hour concentrations of PM_{10} at the point of maximum impact (PMI). No acute risk has been found to be directly created from DPM, so there is no Acute Reference Exposure Level (AREL) assigned to DPM; however, in order to provide an DPM equivalent AREL, the ARELs from all of the other TACs that are emitted in diesel exhaust were added together based on their diesel weighting. This resulted in a diesel emission weighted equivalent AREL of 137 µg/m3. The highest 24-hour concentration at the PMI is 0.033 µg/m3 for DPM equivalent acute non-cancer risk emissions. The resulting Hazard Index is 0.033/137 = 0.00066. Since the criterion for significance is an Acute Hazard Index increase of 1.0 or greater as stated above, the non-cancer acute health risks to residents at the proposed homes would be within the SCAQMD standards.

Nonetheless, the MERV 13 air filter, as a Project Design Feature, is included as part of the project plans that would assist in filtering out TACs and DPM. To ensure installation, the MERV 13 air filter would be verified by the City upon plan check prior to building permit issuance. Therefore, ~~and~~ impacts resulting from acute health effects would be less than significant.

Draft IS/MND Section 16.a., *Recreation*
Page 116-117

Less than Significant Impact. Because the project would construct new homes and it is anticipated that residents would utilize nearby parks and recreational facilities, project development would likely increase the use of existing parks and recreational facilities. Texonia Park is the nearest park to the project site (0.8 miles south) and is a 10.7-acre neighborhood park with a lighted mini-soccer fields, basketball courts, and picnic and playground facilities. The project itself also includes an 11.74-acre public park located on the westerly portion of the project site adjacent to SR-210, and a 3.75-acre landscaped paseo within the interior of the project site. In total, the project proposes approximately 15.49 acres of parkland.

As indicated in Exhibit 3-7 of the Traffic Analysis (*City of Redlands General Plan Bicycle Facilities*), bicycle route configurations, prior to and after General Plan approval in 2017, did not include the County's current proposed alignment of the SART. The General Plan, a conceptual long range planning document, depicted only the existing and conceptual trails that were available at the time the General Plan was approved.

The County's current alignment of the SART proposes using Domestic Avenue and Texas Street for Class II/III bike lanes from the western boundary of the project to intersection of Domestic Avenue and Texas Street. The SART will then turn north on Texas Street to its northern terminus. The proposed project would implement the planned SART as a class II/ III bike lane within Domestic Avenue and Texas Street as planned by the County. Drafted cross sections of Texas Street and Domestic Avenue, confirm this improvement to be constructed as a part of the project. In addition, the project has been conditioned to provide appropriate signage and striping to visually identify the bike lane. Trails within the project would access Domestic Avenue at the southern portion of the public park and would provide trail users with access to the Class II/III bike lane. All impacts related to the construction of project roadways or trails within the project have been analyzed within the IS/MND. Because the project is implementing the County plan for the SART, no conflicts are anticipated.

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Bicycle/Pedestrian Facilities and Public Transit Facilities

There are no existing sidewalks along Domestic Avenue and Texas Street within the project area. There currently are no existing bicycle paths or trails. Since many of the roadways are not fully constructed as designated in the General Plan Circulation Element, limited pedestrian facilities exist in the vicinity of the project.

The proposed project would implement the planned SART as a class III bike lane within Domestic Avenue and Texas Street as planned by the County. Drafted cross sections of Texas Street and Domestic Avenue, confirm this improvement to be constructed as a part of the project. In addition, the project has been conditioned to provide appropriate signage and striping to visually identify the bike lane. Trails within the project would access Domestic Avenue at the southern portion of the public park and would provide trail users with access to the Class II/III bike lane.

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~~Fair Share~~ Development Impact Fees ~~Payments~~

The development of the proposed project is not anticipated to require the construction of any off-site improvements; however, there are improvement needs identified at off-site intersections for future traffic analysis scenarios where the project would contribute traffic. Therefore, the project applicant's responsibility for the project's contributions towards off-site intersection deficiencies is fulfilled through payment of development impact fees (DIF) ~~fair share or participation in the preexisting fee programs~~ that would be assigned to construction of ~~recommended~~ roadway improvements ~~identified in the *Traffic Analysis,*~~ as provided for in City Requirements ~~TR-1~~ below. The project applicant would be required to pay ~~requisite fair share contributions and fee~~ DIF payments consistent with the City's requirements. ~~Specifically, the project applicant is required to pay the project's fair share amount of $555,215 for the improvements identified in Table 1-2 of the *Traffic Analysis* at intersections located in the City, in accordance with the most recent construction cost index dated July 1, 2021.~~ The ~~fair share~~ DIF payment would be required ~~to be submitted~~ prior to the issuance of building permits. ~~Detailed fair share calculations for each peak hour have been provided in **Table 15: Project Fair Share Calculations for Intersections** for the applicable deficient study area intersections.~~

~~Recommended Project Roadway Site Access Improvements~~

~~**Exhibit 5: Site Adjacent Roadway and Site Access Recommendations** shows the recommended roadway improvements needed to accommodate site access, as provided in the *Traffic Analysis.* A description of each improvement is provided in Mitigation Measure TR-1 below.~~

Traffic Signal Warrant

A multi-way stop control warrant has been evaluated based on the future project volumes at the intersection of Street L/Domestic Avenue (intersection leading up to the soccer and baseball fields) and Texas Street/Domestic Avenue. Based on the future project volumes, the intersection of Street L/Domestic Avenue is not anticipated to meet a multi-way stop control warrant. ~~However, according to the California Manual on Uniform Traffic Control Devices (CA MUTCD), the application of a multi-way stop control may also include the need to control vehicle/pedestrian conflicts near locations that generate high pedestrian volumes. Since the intersection is proposed to provide pedestrian access from the adjacent Citrus Valley High School to the proposed ball fields, an all-way stop control shall be implemented at this location. Vehicles would be forced to stop at the intersection, which would provide better visibility in the event pedestrians use the crosswalk. In addition, the CA MUTCD indicates that an all-way stop control may be applicable at an intersection of two (2) residential neighborhood collector streets of similar design and operating characteristics if it would improve traffic operational characteristics of the intersection. The intersection of Texas Street and Domestic Avenue is anticipated to meet a multi-way stop warrant with future project traffic volumes. Implementation of this multi-way stop control is included as part of the recommended improvements provided in City Requirement TR-2 below.~~

Table 1: Project Fair Share Calculations for Intersections

ID	Intersection	Hour	Existing	Project	2040 With Project Volume	Total New Traffic	Project % of New Traffic
2	I-210 NB Ramps/ Tennessee Street and San Bernardino Avenue	AM	2,130	156	3,776	1,646	9.5%
		MD	2,913	239	5,584	2,671	8.9%
		PM	3,228	239	5,642	2,414	9.9%
3	Tennessee Street/ San Bernardino Avenue	AM	1,517	156	2,995	1,478	10.6%
		MD	1,700	240	4,168	2,468	9.7%
		PM	1,801	240	3,964	2,163	**11.1%**
5	Texas Street/Pioneer Avenue	AM	1,099	240	1,938	839	28.6%
		MD	1,064	369	2,623	1,559	23.7%
		PM	1,138	369	2,253	1,115	**33.1%**
6	Texas Street/San Bernardino Avenue	AM	1,625	203	3,134	1,509	13.5%
		MD	1,792	313	4,384	2,592	12.1%
		PM	1,975	313	3,979	2,004	**15.6%**

Notes:

BOLD = Denotes highest DIF payment fair share percentage

Source: Urban Crossroads, Citrus Valley Traffic Analysis, November 10, 2020. Table 8-1, p. 101.

Exhibit 1: Site Adjacent Roadway and Site Access Recommendations

Based on traffic forecasts conducted in the *Traffic Analysis*, the project's DIF contribution to fair share payments for future roadway improvements at the intersections identified in **Table 15** would be required to reduce impacts relative to the performance of the circulation system, as discussed in City Requirement CTR-1 below. In addition, project-specific roadway improvements would be implemented, as provided for in City Requirement CTR-2 below as part of the project's conditions of approval. These City Requirements cause the project to conform with City program plans, ordinances and policies addressing the circulation system, resulting in a less than significant impact.

City Requirements/Conditions of Approval

CTR-1 Prior to the issuance of building permits, the project applicant shall pay DIF fees ~~the project's fair share amount of $555,215 for the improvements identified in Table 1-2 of the *Traffic Analysis* at intersections located in the~~ as required by the City of Redlands, ~~or as agreed to by the City and project applicant~~, in conjunction with all other applicable transportation fees (including but not limited to the City's development impact fees).

~~**CTR-2** Recommended roadway improvements shall be constructed by the project applicant as design features in conjunction with development of the project site as follows:~~

~~***Street L/Street N***:~~

- ~~Install a stop control on the northbound approach and a right-turn lane.~~
- ~~Construct a westbound left-turn lane.~~

~~***Street I/Street N:***~~

- ~~Install a stop control on the northbound approach and a shared left-right turn lane.~~
- ~~Construct an eastbound shared through-right turn lane.~~
- ~~Construct a westbound shared left-through lane.~~

~~***Street K/Street N:***~~

- ~~Install a stop control on the northbound approach and a shared left-right turn lane.~~
- ~~Construct an eastbound shared through-right turn lane.~~
- ~~Construct a westbound shared left-through lane.~~

~~***Street L/Domestic Avenue***:~~

- ~~Install a stop control on all approaches (all-way stop control).~~
- ~~Construct a southbound shared left-right turn lane.~~
- ~~Construct an eastbound shared left-through lane.~~
- ~~Construct a westbound shared through-right turn lane.~~

~~***Street G/Domestic Avenue:***~~

- ~~Install a stop control on the southbound approach and a shared left-right turn lane.~~
- ~~Construct an eastbound shared left-through lane.~~
- ~~Construct a westbound shared through-right turn lane.~~

~~***Street C/Domestic Avenue:***~~

- ~~Install a stop control on the southbound approach and a shared left-right turn lane.~~
- ~~Construct an eastbound shared left-through lane.~~
- ~~Construct a westbound shared through-right turn lane.~~

~~***Texas Street/Street N:***~~

- ~~Install a stop control on the eastbound approach and a shared left-right turn lane.~~
- ~~Construct a northbound left-turn lane.~~

~~***Texas Street/Domestic Avenue (#4):***~~

- ~~Install a stop control on the northbound and southbound approaches, converting the intersection to an all-way stop control. Given the proximity to the adjacent Citrus Valley High School and the adjacent residential developments (including the proposed project), an all-way stop control will provide better visibility for pedestrian crossings as vehicles would be required to stop before the crosswalk.~~

~~Domestic Avenue:~~

- ~~Construct Domestic Avenue at its ultimate half-section on the north side of the roadway as a collector (64-foot right-of-way) and on the south side as a local street (60-foot right-of-way with 20-feet of pavement) from the project's western boundary to Texas Street, consistent with the City's standards. Construct the cul-de-sac at the western terminus of Domestic Avenue consistent with the City's standards.~~

~~Street N:~~

- ~~Construct Street N at its ultimate half-section width as a collector (64-foot right-of-way) plus one 12-foot lane on the north side from the Project's western boundary to Texas Street, consistent with the City's standards.~~

~~Texas Street:~~

- ~~Construct Texas Street as a collector (66-foot right-of-way) from Street N to the existing terminus north of Domestic Avenue, consistent with the City's standards. The Project is to accommodate 20-32 feet of pavement on the east side (varies) and a minimum of 14 feet of pavement on the west side.~~