

DRAFT

**Initial Study and Mitigated Negative Declaration
Zanja Trail and Greenway Park Project – 7th St. to Church St.**

October 2019

**Lead Agency:
City of Redlands**



**P.O. Box 3005
Redlands, CA 92373**

Prepared by:



**215 N. 5TH Street
Redlands, CA 92374**

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**DRAFT MITIGATED NEGATIVE DECLARATION
ZANJA TRAIL AND GREENWAY PARK – 7TH ST. TO CHURCH ST. PROJECT**

Lead Agency: City of Redlands

Project Proponent: The Redlands Conservancy

Project Location: Along the Zanja alignment from 7TH St. to Church St. north of Redlands Boulevard and south of Interstate 10.

Project Description: The Proposed Project would begin at 7th Street and end at Church Street. The Proposed Project includes two elements, a Zanja Trail Gateway Monument at its westernmost end at 7th Street, and a 0.4-mile trail from 7th Street to Church Street. The trail is characterized as a decomposed granite pedestrian trail with a varying width of 6 to 12 feet.

Public Review Period: October 25, 2019 to November 13, 2019

Mitigation Measures Incorporated into the Project to Avoid Significant Effects:

Biological Resources

- BIO-1:** If construction activities occur within the bird breeding season (February 1 through August 31) then a pre-construction nesting survey shall be conducted no more than 30 days prior to the start of construction by a qualified biologist. The nest survey shall include the project site and areas within 500 feet of the site that could be affected by construction activities that could generate indirect effects to nesting birds, such as noise, human activity, dust, etc. If active bird nests are found during the survey, and could be affected by construction activities, then the qualified biologist shall establish an appropriate buffer zone around the active nests based on the work activities, nesting species, and likelihood of the species being affected by construction activities. Buffers may typically be a 300-foot radius for songbirds and a 500-foot radius for raptors. Project activities shall be avoided within the buffer zone until the nest is deemed no longer active by the biologist. Weekly nesting surveys and biological monitoring may be necessary if nesting birds are found on the project site.
- BIO-2:** To ensure impacts to waters and habitats jurisdictional to the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife are avoided, an exclusion zone shall be staked by a qualified biologist prior to the commencement of ground-disturbing activities. The exclusion zone shall remain in place for the duration of construction, and the purpose of the exclusion zone shall be included in the construction worker daily briefings (tailgate meetings).

Cultural Resources

- CUL-1: Archaeological Monitoring:** Due to the heightened cultural sensitivity of the proposed project area, an archaeological monitor with at least 3 years of regional experience in archaeology shall

be present for all ground-disturbing activities that occur within the proposed project. Ground disturbance is defined as any activity that compacts or disturbs the ground within a project area. The project area is defined as all areas where project activities will occur, including: the actual construction activities, permanent easements, temporary construction easements, staging areas for supplies and equipment, and borrow pits. Ground disturbance can also be caused by the use of hand tools (shovels, pick axe, posthole digger, etc.), heavy equipment (excavators, backhoes, bulldozers, trenching and earthmoving equipment, etc.), and heavy trucks (large four wheel drive trucks, dump trucks and tractor trailers, etc.). Trenching, bulldozing, excavating, scraping, and plowing are typical examples of ground disturbance activities. Project types that usually involve ground disturbance include acquisition/demolition/relocation of structures; vegetation management; landslide stabilization; and infrastructure projects such as utilities, storm water management, and flood control. However, any projects that include the installation of utilities, culverts, temporary roads or structures, permanent roads, foundations and footers all typically involve ground disturbance activities. A sufficient number of archaeological monitors shall be present each work day to ensure that simultaneously occurring ground disturbing activities receive thorough levels of monitoring coverage. A Monitoring and Treatment Plan that is reflective of the project mitigation (“Cultural Resources” and “Tribal Cultural Resources”) shall be completed by the archaeologist and submitted to the Lead Agency for dissemination to the government representatives of consulting Tribes. Once all parties review and approve the plan, it shall be adopted by the Lead Agency – the plan must be adopted prior to permitting for the project. Any and all findings will be subject to the protocol detailed within the Monitoring and Treatment Plan.

Hazards and Hazardous Materials

HAZ-1: Prior to work in any City street, a Traffic Control Plan shall be submitted to the City of Redlands Engineering Department for review and approval. The Traffic Control Plan shall include measures to maintain emergency access to residences and structures in the vicinity of the project area.

Noise

NOI-1: The applicant shall limit construction activities to the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday with no construction activities permitted on weekends and Federal holidays. Project contractors shall ensure that all construction equipment, fixed or mobile, shall be operated with properly functioning and maintained mufflers, consistent with manufacturer standards. Stationary construction equipment shall be located as far away from residences or religious institutions as is practical.

Transportation/Traffic

TRANS-1: The final design of traffic and pedestrian control features at trail’s intersection with 7th Street and 9th Street shall be approved by the City Engineer prior to encroachment permit issuance.

These design features could include, but are not limited to, removable lockable bollards at the trail entrances, colored stamped concrete, and signage.

Tribal Cultural Resources

TCR-1: Tribal Monitoring: Due to the heightened cultural sensitivity of the proposed project area, Tribal monitors representing the consulting Tribes shall be present, on a rotating basis, for all ground-disturbing activities that occur within the proposed project. Ground disturbance is defined as any activity that compacts or disturbs the ground within a project area. The project area is defined as all areas where project activities will occur, including: the actual construction activities, permanent easements, temporary construction easements, staging areas for supplies and equipment, and borrow pits. Ground disturbance can also be caused by the use of hand tools (shovels, pick axe, posthole digger, etc.), heavy equipment (excavators, backhoes, bulldozers, trenching and earthmoving equipment, etc.), and heavy trucks (large four wheel drive trucks, dump trucks and tractor trailers, etc.). Trenching, bulldozing, excavating, scraping, and plowing are typical examples of ground disturbance activities. Project types that usually involve ground disturbance include acquisition/demolition/relocation of structures; vegetation management; landslide stabilization; and infrastructure projects such as utilities, storm water management, and flood control. However, any projects that include the installation of utilities, culverts, temporary roads or structures, permanent roads, foundations and footers all typically involve ground disturbance activities. A sufficient number of Tribal monitors shall be present each work day to ensure that simultaneously occurring ground disturbing activities receive thorough levels of monitoring coverage. A Monitoring and Treatment Plan that is reflective of the project mitigation (“Cultural Resources” and “Tribal Cultural Resources”) shall be completed by the archaeologist, as detailed within CUL-1, and submitted to the Lead Agency for dissemination to the government representatives of consulting Tribes. Once all parties review and agree to the plan, it shall be adopted by the Lead Agency – the plan must be adopted prior to permitting for the project. Any and all findings will be subject to the protocol detailed within the Monitoring and Treatment Plan.

TCR-2: Treatment of Cultural Resources: If a pre-contact and/or post-contact cultural resource is discovered during project implementation, ground disturbing activities shall be suspended 60 feet around the resource(s) and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. Representatives from the consulting Tribal governments, the Archaeological Monitor/applicant, and the Lead Agency shall confer regarding treatment of the discovered resource, as detailed within the Monitoring and Treatment Plan. A research design shall be developed and will include a plan to evaluate the resource for significance under CRHR criteria, as well as its potential as a Tribal Cultural Resource (TCR).

Should any significant resource(s) not be a candidate for avoidance or preservation in place, and the removal of the resource(s) is necessary to mitigate impacts, the research design shall include a comprehensive discussion of limited non-destructive sampling strategies, resource processing, analysis, and reporting protocols/obligations. Removal of any cultural resource(s) shall be conducted with the presence of a Tribal monitor representing the consulting Tribes, unless otherwise decided by government representatives of the consulting Tribes. All plans for analysis

shall be reviewed and approved by the applicant and government representatives of the consulting Tribes prior to implementation, and all removed material shall be temporarily curated on-site. It is the preference that removed cultural material be reburied as close to the original find location as possible. However, should reburial within/near the original find location during project implementation not be feasible, then a reburial location for future reburial shall be decided upon by the consulting Tribes, the landowner, and the Lead Agency, and all finds shall be reburied within this location. Additionally, in this case, reburial shall not occur until all ground-disturbing activities associated with the project have been completed, all monitoring has ceased, all cataloguing and basic recordation of cultural resources have been completed, and a final monitoring report has been issued to Lead Agency, CHRIS, and consulting Tribes. All reburials are subject to a reburial agreement that shall be developed between the landowner and government representatives of the consulting Tribes outlining the determined reburial process/location, and shall include measures and provisions to protect the reburial area from any future impacts (vis a vis project plans, conservation/preservation easements, etc.).

Should it occur that avoidance, preservation in place, and on-site reburial are not an option for treatment, the landowner shall relinquish all ownership and rights to this material and confer with government representatives of the consulting Tribes to identify an American Association of Museums (AAM)-accredited facility within the County that can accession the materials into their permanent collections and provide for the proper care of these objects in accordance with the 1993 CA Curation Guidelines. A curation agreement with an appropriate qualified repository shall be developed between the landowner and museum that legally and physically transfers the collections, along with title and associated records to the facility. This agreement shall stipulate the payment of fees necessary for permanent curation of the collections and associated records and the obligation of the Project developer/applicant to pay for those fees.

All draft records/reports containing the significance and treatment findings and data recovery results shall be prepared by the archaeologist and submitted to the Lead Agency and government representatives of the consulting Tribes for their review and comment within 30 days of receipt. After approval from all parties, the final reports and site/isolate records are to be submitted to the local CHRIS Information Center, the Lead Agency, and consulting Tribes.

TCR-3: Inadvertent Discoveries of Human Remains/Funerary Objects: In the event that any human remains are discovered within the project area, ground disturbing activities shall be suspended 100 feet around the resource(s) and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. The on-site lead/foreman shall then immediately notify the government representatives of the consulting Tribes, the applicant/developer, and the Lead Agency. The Lead Agency and the applicant/developer shall then immediately contact the County Coroner regarding the discovery. If the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner shall ensure that notification is provided to the NAHC within twenty-four (24) hours of the determination, as required by California Health and Safety Code § 7050.5 (c). The NAHC-identified Most Likely Descendant (MLD), shall be allowed, under California Public Resources Code § 5097.98

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(a), to (1) inspect the site of the discovery and (2) make determinations as to how the human remains and funerary objects shall be treated and disposed of with appropriate dignity. The MLD, Lead Agency, and landowner agree to discuss in good faith what constitutes "appropriate dignity" as that term is used in the applicable statutes. The MLD shall complete its inspection and make recommendations within forty-eight (48) hours of the site visit, as required by California Public Resources Code § 5097.98.

Reburial of human remains and/or funerary objects (those artifacts associated with any human remains or funerary rites) shall be accomplished in compliance with the California Public Resources Code § 5097.98 (a) and (b). The MLD in consultation with the landowner, shall make the final discretionary determination regarding the appropriate disposition and treatment of human remains and funerary objects. All parties are aware that the MLD may wish to rebury the human remains and associated funerary objects on or near the site of their discovery, in an area that shall not be subject to future subsurface disturbances. The applicant/developer/landowner should accommodate on-site reburial in a location mutually agreed upon by the Parties.

It is understood by all Parties that unless otherwise required by law, the site of any reburial of Native American human remains or cultural artifacts shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code § 6254 (r).

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ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
APE	Area of Potential Effect
AQMP	Air Quality Management Plan
BMPs	Best Management Practices
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation

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CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CH ₄	Methane
CO	Carbon Monoxide
CO ₂	Carbon Dioxide
CO ₂ e	Carbon Dioxide Equivalent
CO Plan	Federal Attainment Plan for Carbon Monoxide
CRHR	California Register of Historic Places
CWA	California Water Act
DTSC	Department of Toxic Substances Control
EIC	Eastern Information Center
EIR	Environmental Impact Report
GHGs	Greenhouse Gases
LSTs	Localized Significance Thresholds
MBTA	Migratory Bird Treaty Act
MLD	Most Likely Descendent
MND	Mitigated Negative Declaration
NAHC	Native American Heritage Commission
ND	Negative Declaration
NO _x	Nitrogen Oxides
NRHP	National Register of Historic Places
PM ₁₀ and PM _{2.5}	Particulate Matter
ROG	Reactive Organic Gases
RWQCB	Regional Water Quality Control Board
USACE	United States Army Corps of Engineers
SCAQMD	South Coast Air Quality Management District
SP	Service Population
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board

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SECTION 1.0 BACKGROUND

1.1 Summary

Project Title:	Zanja Trail and Greenway Park Project – 7 th St. to Church St.
Lead Agency Name and Address:	City of Redlands PO Box 3005 Redlands, CA 02373
Contact Person and Phone Number:	Chris Boatman, Facilities & Community Services (909) 798-7655
Project Location:	Adjacent to the Zanja alignment, from 7 th St. to Church St., north of Redlands Boulevard and south of Interstate 10.
General Plan Designation:	Linear Park, Parks/Golf Courses, and Commercial/Industrial
Zoning:	SP-45/TC, Specific Plan 45/Town Center

1.2 Introduction

The City of Redlands (City) is the Lead Agency and the San Bernardino Flood Control District is a Responsible Agency for this Initial Study. The Initial Study has been prepared to identify and assess the anticipated environmental impacts of the Zanja Trail and Greenway Park Project – 7th St. to Church St. This document has been prepared to satisfy the California Environmental Quality Act (CEQA) (Pub. Res. Code, Section 21000 *et seq.*) and State CEQA Guidelines (14 CCR 15000 *et seq.*). CEQA requires that all state and local government agencies consider the environmental consequences of Projects over which they have discretionary authority before acting on those Projects. A CEQA Initial Study is generally used to determine which CEQA document is appropriate for a Project (Negative Declaration [ND], Mitigated Negative Declaration [MND], or Environmental Impact Report [EIR]).

1.3 Surrounding Land Uses/Environmental Setting

The Zanja Trail and Greenway Park Project – 7th Street to Church Street (Proposed Project) would parallel an approximately 1,050 linear foot segment of the Mill Creek Zanja along its north side between 9th Street and Church Street, and an approximately 600 linear foot segment north of the Hatfield Buick property (Figures 1 and 2). The proposed trail alignment between 9th Street and Church Street is located adjacent to multiple-family residential neighborhoods. The proposed trail alignment between 7th Street and 9th Street is located adjacent to commercial and office uses (Hatfield Buick dealer, The Door Christian Fellowship, and the Redlands Mill office building). The Zanja is listed on the National Register of Historic Places (NRHP) and is a California Historic Landmark. The Zanja is the oldest civil engineering project

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remaining in southern California and was fundamental to the founding and settlement of Redlands. The Zanja is depicted on the earliest United States Geological Survey (USGS) topographic maps of the area.

The elevation of the project area ranges from 1,375 feet above mean sea level (msl) to 1,404 feet msl. It is located approximately 1.9 miles south of the Santa Ana Wash that emanates from the San Bernardino Mountains approximately 5.3 miles to the northeast. Soil in the area consists of fluvial sediments of the Santa Ana River flood plain, made up of coarse granitic sand and gravel. The project site contains only heavily disturbed habitat in an urban setting that is mostly void of vegetation and includes non-native grassland, disturbed habitat, and developed areas. Sediments in the area are highly disturbed due to the creation of the Zanja itself and other modern improvements to the channel. The banks of the Zanja have been graded to provide a flat maintenance access road adjacent to the channel that also serves as an informal pedestrian walkway. Representative site photos are provided below.



Photo 1 - Mill Creek Zanja between 9th Street and Church Street facing west.



Photo 2 - Mill Creek Zanja between 9th Street and Church Street facing west.



Photo 3 - Mill Creek Zanja Inlet at 9th Street facing west.



Photo 4 - Proposed Zanja Trail Gateway Monument location at 7th Street facing east.

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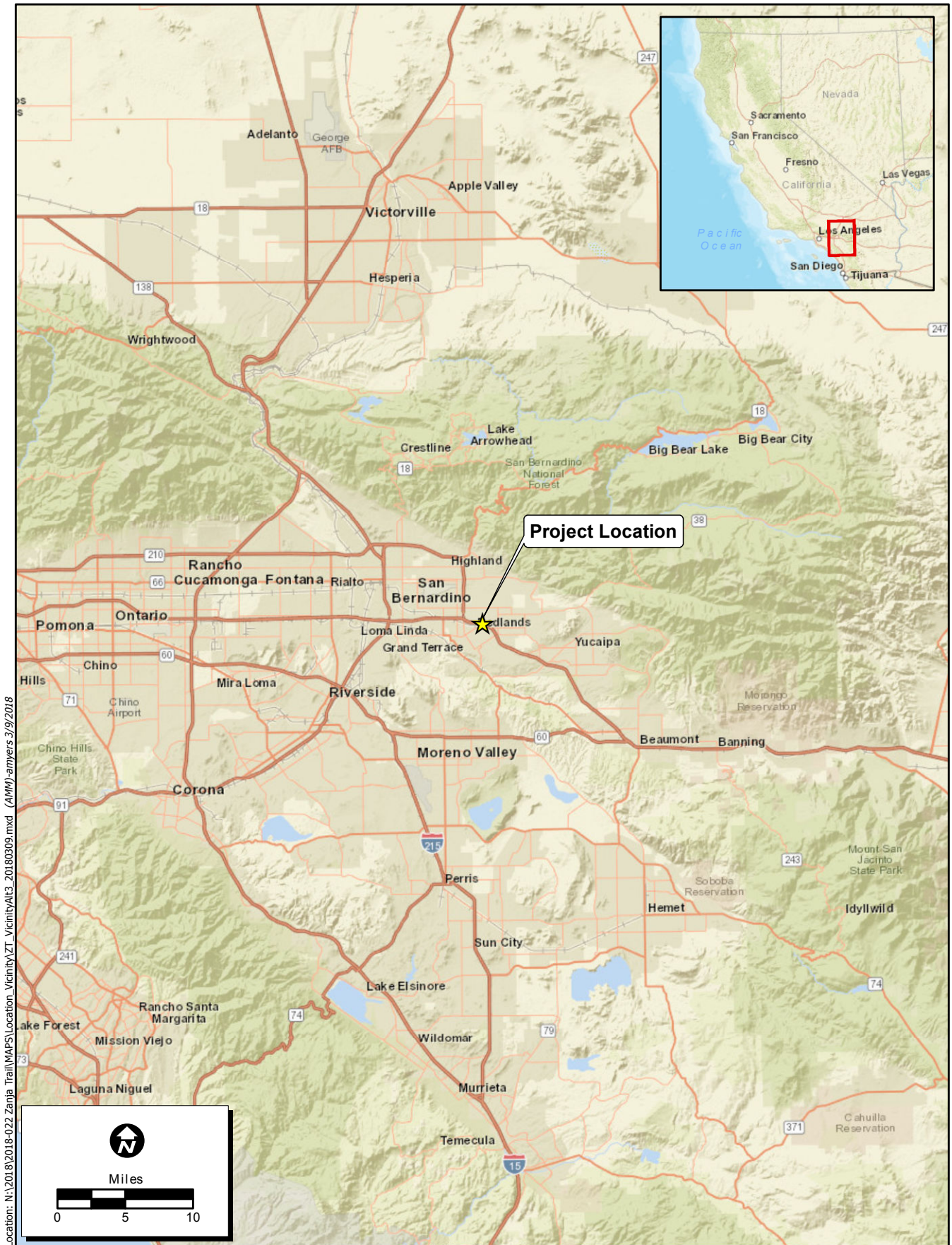
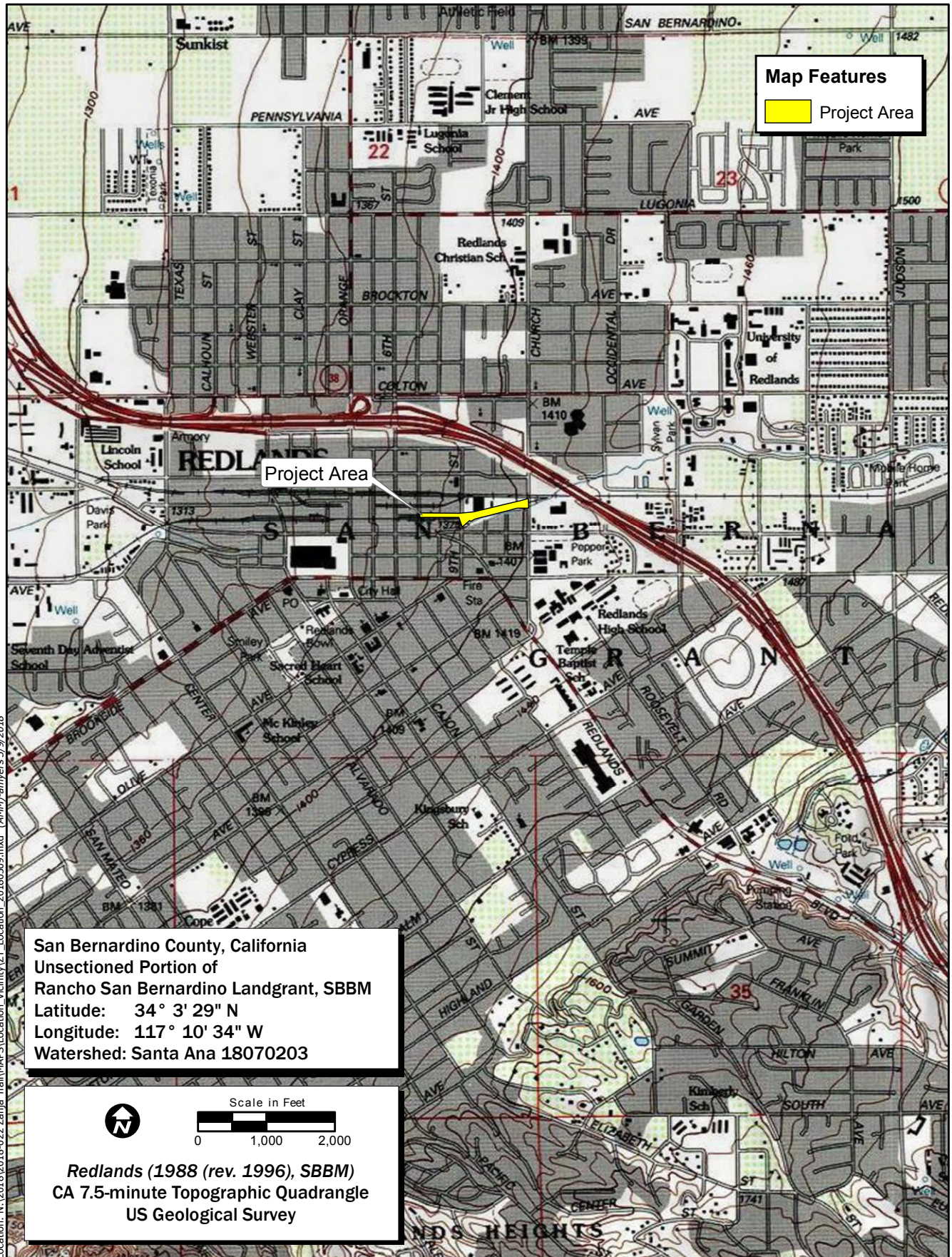


Figure 1. Project Vicinity

2018-022 Zanja Trail Project

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Map Date: 3/9/2018
 iService Layer Credits: Copyright © 2013 National Geographic Society, I-cubed

Figure 2. Project Location
 2018-022 Zanja Trail Project

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SECTION 2.0 PROJECT DESCRIPTION

2.1 Project Background

The information in the Project Background is taken from the *Zanja Trail and Greenway Park Project Master Plan* (Redlands Conservancy 2015). This Master Plan was accepted by the Redlands City Council on December 15, 2015 as the guiding document for development of the Zanja Trail.

The City of Redlands Park and Open Space Plan, adopted in 1987, calls for eight major features, one of which is the creation of “a strip park and related trails following the Zanja from Crafton through the downtown area to the westerly city limits.” Much of this 1987 plan was incorporated into the City’s Open Space and Conservation Element of the 1995 General Plan. The recently-adopted 2017 General Plan includes the Zanja Trail as part of a regional trail network which also includes the Orange Blossom Trail and Santa Ana River Trail.

The Redlands Conservancy has prepared a Master Plan, which identifies the route, potential amenities, and opportunities and constraints of the full Zanja trail alignment, which originally extended from Wabash Avenue to 9th Street/Redlands Boulevard and has since been revised to extend to 7th Street, approximately 2.3 miles. This Initial Study focuses only on the 7th Street to Church Street portion of the trail.

2.2 Project Characteristics

The Proposed Project would begin at 7th Street and end at Church Street. The Proposed Project includes two elements, a Zanja Trail Gateway Monument at its westernmost end at 7th Street, and a 0.4-mile trail from 7th Street to Church Street. The trail is characterized as a pedestrian trail with a varying width of 6 to 12 feet (Figure 3).

7th Street to 9th Street Trail Segment

This trail segment would be approximately 600 feet long, within a 54- to 60-foot-wide alignment from the western curb of 7th Street to the western curb of 9th Street. In this area the Zanja channel is underground. This space is currently used as a surface parking for a religious facility (The Door Christian Fellowship) located north of the Hatfield Buick dealership. This space is owned by the City and is leased to the religious facility.

The trail would begin at the western curb of 7th Street, north of Redlands Boulevard, where an enhanced paving crosswalk would be installed. On the eastern side of 7th Street a Zanja Trail Gateway Monument would be installed. A 6-foot-wide natural surface pedestrian trail would be built within a 16 to 22-foot-wide strip of landscaping north of the Hatfield Buick dealership. Landscaping would include native trees and shrubs to provide shade and help shield pedestrians from vehicles using the parking lot. Interpretive way-finding and mile-marking signs would also be installed along the route and at the northwest corner of Redlands Boulevard and 7th Street. The area north of the trail would include a 40-space parking lot with a two-way drive aisle. Existing fencing on both the north and south side of the existing parking lot would remain.

9th Street to Church Street Trail Segment

This trail segment would be approximately 1,050 feet long and extend from the western curb of 9th Street to the western curb of Church Street. This segment of the trail alignment would be constructed within an area owned by City of Redlands Successor Agency.

Improvements would include an enhanced pavement street crossing at 9th Street and Church Street. The proposed trail alignment would consist of a 12-foot-wide natural surface pedestrian trail. Along this segment, both the pedestrian trail would be located north of the Zanja channel with a 42 inch tall post and rail fence separating the path from the channel. Along the route, interpretive way-finding signs would be installed. Removable lockable bollards would be installed at the trail entrances at 9th Street and Church Street to deter motorized vehicles from entering the trail. If necessary, the pedestrian trail would also serve as an access road for San Bernardino Flood Control District vehicles. Trash receptacles and dog waste removal units would be installed at road crossings. Native plantings and shade trees would be planted along the route.

Proposed Project improvements would avoid work in the Zanja channel or the portions of its banks that have been designated as under the jurisdiction of the U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and/or California Department of Fish and Wildlife (CDFW).

2.3 Project Timing

Project construction is anticipated to begin in December 2019 and take approximately 6 months.



ZANJA TRAIL, PHASE TWO: 7TH ST. - CHURCH ST.
 CONCEPTUAL SITE PLAN
 ZANJA TRAIL AND GREENWAY PARK, REDLANDS, CA

SCHMIDT DESIGN GROUP, INC.
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 Lic. CA 9198, NY 219, AZ 54399



SCALE: 1"=30'
 Project Number 14-406
 June 5, 2018

Source: Schmidt Design Group, Inc. 2018

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2.4 Regulatory Requirements, Permits, and Approvals

The following approvals and regulatory permits would be required for implementation of the Proposed Project:

- City of Redlands
 - Design approval
 - Encroachment permit for work in 7th, 9th, and Church Streets
 - Building Permit

2.5 Consultation With California Native American Tribe(s)

The following California Native American tribes traditionally and culturally affiliated with the project area have been notified of the project: Morongo Band of Mission Indians; San Manuel Band of Mission Indians; Torres Martinez Desert Cahuilla Indians; Soboba Band of Luiseño Indians; and Gabrieleño Band of Mission Indians – Kizh Nation. The Morongo Band of Mission Indians, San Manuel Band of Mission Indians, and the Soboba Band of Luiseño Indians have requested consultation pursuant to Public Resources Code section 21080.3.1. A summary of the consultation process is provided in Section 4.18 of this Initial Study.

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SECTION 3.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED AND DETERMINATION

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.

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

Determination

On the basis of this initial evaluation:

I find that the Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

I find that although the 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 Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

I find that the 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 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 Project, nothing further is required.



Tabitha Kevari
Senior Manager

10/21/19

Date

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SECTION 4.0 ENVIRONMENTAL CHECKLIST AND DISCUSSION

4.1 Aesthetics

4.1.1 Environmental Setting

State Scenic Highways

The California Scenic Highway Program protects and enhances the scenic beauty of California’s highways and adjacent corridors. A highway can be designated as scenic based on how much natural beauty can be seen by users of the highway, the quality of the scenic landscape, and if development impacts the enjoyment of the view. There are no State Scenic Highways in the vicinity of the Proposed Project (Caltrans 2018).

City of Redlands General Plan

The project area is designated as a scenic trail in the City of Redlands General Plan (City of Redlands 2017). The City’s General Plan Historic and Scenic Conservation element has also designated several scenic drives in the City; none of these are in proximity to the project site (City of Redlands 2017).

Visual Character of the Project Site

The Proposed Project would encompass an approximately 600 linear foot segment north of the Hatfield Buick property from 7th Street to 9th Street and an approximately 1,050 linear foot segment of the Mill Creek Zanja along its north side between 9th Street and Church Street. The project site from 7th Street to 9th Street consists of a paved parking lot. The project site from 9th Street to Church Street consists of an existing County of San Bernardino flood control access road adjacent to the Zanja from 9th Street to Church Street.

The proposed trail alignment between 9th Street and Church Street is located adjacent to multiple-family residential neighborhoods. The proposed trail alignment between 7th Street and 9th Street is located adjacent to commercial and office uses (Hatfield Buick dealer, The Door Christian Fellowship, and the Redlands Mill office building). The project site is largely unvegetated, covered in non-native grassland, and paved areas associated with the adjacent dealer and religious facility land uses. The Zanja channel is an unvegetated trapezoidal streambed that supports scattered disturbed riparian vegetation.

4.1.2 Aesthetics (I) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Proposed Project is not located in proximity to a designated scenic drive in the City’s General Plan. The Proposed Project would create a pedestrian and multipurpose trail segment of the Zanja Trail with

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associated landscaping in an area currently devoid of vegetation, improving the views from nearby properties. The Proposed Project would also improve the views of a designated scenic trail. A beneficial impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Proposed Project would not be located within or near a State Scenic Highway (Caltrans 2018). No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site is composed of unvegetated areas, areas covered in non-native grassland, and paved areas associated with the adjacent automobile dealer and religious facility land uses. As discussed previously, the Proposed Project would improve the visual character of the site, which is a designated scenic trail. A beneficial impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Proposed Project does not include lighting. Future lighting for security and safety may be included but would be shielded and directed downward to avoid spillover effects on surrounding properties. Impacts would be less than significant.

4.1.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.2 Agriculture and Forestry Resources

4.2.1 Environmental Setting

The project site is located in an area designated as Linear Park, Parks/Golf Courses, and Commercial/Industrial land use by the City of Redlands General Plan (City of Redlands 2017). The majority of the project site is located adjacent to a multiple-family residential neighborhood with the exception of the Hatfield Buick dealer at the western end of the proposed alignment. The project site is designated as Urban and Built Up Land on the most recent California Department of Conservation Important Farmland and Williamson Act Maps (CDC 2016; 2017). The project site is zoned Specific Plan 45/Town Center and is not used for forestry.

4.2.2 Agriculture and Forestry Resources (II) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site is not located within any farmland uses (City of Redlands 2017). The California Mapping and Monitoring Program, Important Farmlands Map for San Bernardino County does not list the soils on the project site as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (CDC 2017). No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site is zoned Specific Plan 45/Town Center and not zoned for agricultural use (City of Redlands 2017). According to the California Department of Conservation Williamson Act Parcels Map for San Bernardino County, the project site is not subject to a Williamson Act Contract (CDC 2016). No impact would occur.

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Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site is zoned Specific Plan 45/Town Center and not zoned for forest land or timberland (City of Redlands 2017). Surrounding areas are developed with commercial and residential uses. No impact would occur.

Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site is zoned Specific Plan 45/Town Center and not zoned for forest land (City of Redlands 2017). The project site is currently developed in some areas and does not contain forestland or timberland. Surrounding areas are developed with commercial and residential uses. No impact would occur.

Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site and surrounding properties are not currently used for agriculture. The Proposed Project would not result in the conversion of forest land to non-forest use. No impact would occur.

4.2.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.3 Air Quality

An air quality and greenhouse gas (GHG) report was recently prepared for the Zanja Trail and Greenway Project – Wabash Avenue to Lincoln Street (Rincon Consultants 2016). The Wabash Avenue to Lincoln Street segment of the Zanja Trail and Greenway Project is located approximately 1.25 miles east of the Proposed Project. A comparison of the scope of the Wabash Avenue to Lincoln Street segment and the Proposed Project is shown on Table 4.3-1.

Due to the close proximity of the two projects and because the Wabash Avenue to Lincoln Street segment includes a greater scope of work (see table 4.3-1), it was determined that the previously prepared air quality and GHG study would be a conservative representation of potential air quality and GHG impacts that would result from the Proposed Project. As such, the Proposed Project relies on the air quality and GHG report prepared for Wabash Avenue to Lincoln Street segment of the Zanja Trail and Greenway Project (Rincon Consultants 2016).

Table 4.3-1. Comparison of Wabash Avenue to Lincoln Street Segment and Proposed Project

Component	Wabash Avenue to Lincoln Street Segment (Representative Project)	Proposed Project
Pocket Park (Laramie)	1.2 acre	Not included
Trail Segment	3,300 linear feet	1,700 linear feet
Pocket Park (Wabash)	0.5 acre	Not Included

4.3.1 Environmental Setting

The Proposed Project is located in a portion of San Bernardino County that is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). This portion of the South Coast Air Basin is a non-attainment area for both the federal and state standards for ozone and particulates less than 10 microns and 2.5 microns in diameter (PM₁₀ and PM_{2.5}).

4.3.2 Air Quality (III) Environmental Checklist and Discussion

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SCAQMD's 2012 Air Quality Management Plan (AQMP) was designed to meet state and federal Clean Air Acts planning requirements for all areas within SCAQMD jurisdiction. The 2012 AQMP focuses on ozone and PM_{2.5} and incorporates scientific data, emission inventories, ambient measurements, control strategies, and air quality modeling. The 2012 AQMP uses approved motor vehicle emissions model and planning assumptions. Per Section 40925 of the Health and Safety Code, the triennial updates to the

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AQMP must incorporate new data and projections on rates of population-related, industry-related, and vehicle-related emissions growth actually experienced and projected for the future.

Projects consistent with the projections of employment and population growth in the 2012 AQMP would not interfere with attainment of air quality standards. The AQ/GHG report for the Wabash Avenue to Lincoln Street segment of the Zanja Trail and Greenway Project concluded that development of this portion of the Zanja Trail would be consistent with the City’s General Plan and would not cause employment or population growth; and therefore, would be consistent with the 2012 AQMP (Rincon Consultants 2016). In comparison, the Proposed Project would develop a similar project with a smaller scope (see Table 4.3-1). Based on the previous analysis, it can be determined that the Proposed Project is less likely to obstruct implementation of an applicable air quality plan and would be consistent with the 2012 AQMP. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Construction Impacts

To provide a worst-case analysis of the Proposed Project the AQ/GHG report for the Wabash Avenue to Lincoln Street segment of the Zanja Trail and Greenway Project was used to determine AQ/GHG impacts for the Proposed Project. This representative project entails a typical (i.e., usual) construction scenario, including site preparation, grading, paving, and application of architectural coatings. Construction scenario assumptions were based on anticipated construction of a pocket park at the corner of Lincoln Street and Laramie Avenue, a 3,300-linear-foot multipurpose trail, and a pocket park at the trail terminus at Wabash Avenue. It should be noted that the representative project is greater in size and scope than the Proposed Project, as shown in Table 4.3-1.

The AQ/GHG report for the representative project determined that criteria pollutant emissions from construction of the representative project would not exceed the SCAQMD regional daily thresholds for reactive organic gases (ROG), nitrogen oxides (NO_x), carbon monoxide (CO), PM₁₀, or PM_{2.5} as shown in Table 4.3-2.

Table 4.3-2. Estimated Maximum Daily Construction Emissions (Representative Project)

	Maximum Emissions (lbs/day)¹				
	ROG	NO_x	CO	PM₁₀	PM_{2.5}
Maximum Daily Emissions	66.0	28.7	20.1	4.4	3.0
SCAQMD Regional Thresholds	75	100	550	150	55
Threshold Exceeded?	No	No	No	No	No
Maximum Daily Emissions (onsite only) ²	n/a	28.6	19.0	4.3	2.9
Local Significance Threshold	n/a	170	1,174	7	5

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	Maximum Emissions (lbs/day)¹				
	ROG	NOx	CO	PM₁₀	PM_{2.5}
Threshold Exceeded?	n/a	No	No	No	No

Source: Rincon Consultants 2016

The Proposed Project’s scope would be smaller compared to the representative project. Based on the previous analysis, it can be determined that impacts associated with construction of the Proposed Project would be the same or less than the representative project; and therefore, less than significant.

Long-Term Operational Impacts

Operational emissions associated with the representative project were modeled using CalEEMod. Because CalEEMod does not contain a trail project land use type, a city park land use type was used instead. This results in a very conservative air quality emissions increase, as many users of the Zanja trail are expected to be from nearby residential neighborhoods. Operational impacts can come from motor vehicle trips to and from the trailheads and emissions from equipment used to maintain landscaping and the decomposed granite trails. Note that the representative projects’ operational emissions were only compared to SCAQMD’s regional thresholds. LSTs do not apply to long-term operation of the trails and pocket parks because the majority of emissions would be generated by mobile sources, which are not considered by LSTs. Table 4.3-3 summarizes estimated operational emissions from the representative project.

Table 4.3-3. Estimated Maximum Daily Operational Emissions (Representative Project)

	Maximum Emissions (lbs/day)¹				
	ROG	NOx	CO	PM₁₀	PM_{2.5}
Maximum Daily Emissions	0.4	<0.1	<0.1	<0.1	<0.1
SCAQMD Regional Thresholds	55	55	550	150	55
Threshold Exceeded?	No	No	No	No	No

Source: Rincon Consultants 2016

Notes: ¹ROG = Reactive Organic Gases; NOx = oxides of nitrogen; CO = carbon monoxide; PM₁₀= particulate matter 10 microns in diameter; PM_{2.5} = particulate matter 2.5 microns in diameter; n/a = not applicable

As shown in table 4.3-3 above, emissions for the representative project are anticipated to be lower than SCAQMD thresholds and would be less than significant.

As shown on Table 4.3-1, the Proposed Project does not include pocket parks and the proposed trails would only measure approximately 1,700 linear feet compared to 3,300 linear feet of the representative project. Based on the modeled operational emissions of the representative project and the smaller scope of the Proposed Project, it can be determined that impacts associated with the operation of the Proposed Project would be the same or less than the representative project. Impacts would be less than significant.

It should also be noted that the Proposed Project would provide an alternative mode of transportation which could potentially improve air quality.

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Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The SCAQMD’s approach for assessing cumulative impacts is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and state Clean Air Acts. As previously discussed, the Proposed Project would be consistent with the AQMP, which is intended to bring the South Coast Air Basin into attainment for all criteria pollutants. Impacts would be less than significant.

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Proposed Project would temporarily contribute to localized air pollutant emissions during short-term construction; however, the emissions are not anticipated to exceed daily emission thresholds for criteria pollutants (see response to question b, above). The Proposed Project would not create substantial pollutant concentrations. A less than significant impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Construction of the Proposed Project could result in minor amounts of odor compounds associated with diesel exhaust from heavy equipment. However, construction would be short-term. Impacts associated with odors during construction would be less than significant.

4.3.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.4 Biological Resources

The project site was surveyed for biological resources in March 2018 (ECORP 2018a).

4.4.1 Environmental Setting

Vegetation Communities

The project site contains only heavily disturbed habitat that is mostly void of vegetation and includes non-native grassland, disturbed habitat, and developed areas. Non-native grassland within the project area is sparse and occurs in upland areas south of the Zanja channel and immediately west and adjacent to Church Street, adjacent to residential neighborhoods. Dominant plants within the grassland community were nonnative grasses such as wild brome (*Bromus* sp.). Disturbed is not a vegetation classification, but rather a land use type. Disturbed areas located on the project site included the vacant lot west of 9th Street and other areas bordering the north side of the Zanja channel. Areas designated as developed have infrastructure present and any vegetation in the immediate surroundings represents ornamental landscaping. Developed is not a vegetation classification, but rather a land use type. Developed areas were located at the west end of the project site and consisted of a paved parking lot. The Zanja channel itself is generally void of vegetation as well, with only several occurrences of resprouting Mexican fan palm and one mulefat (*Baccharis salicifolia*). The re-sprouting vegetation is evidence that the channel is regularly cleared and maintained. Areas immediately surrounding the project site consist of disturbed habitat, non-native grassland, and urban commercial properties.

Wildlife

Wildlife species observed or detected within the project area were mostly native species typical of the surrounding urban and suburban environment. Species observed included western fence lizard (*Sceloporous occidentalis*), house finch (*Carpodacus mexicanus*), American crow (*Corvus brachyrhynchos*), and red-tailed hawk (*Buteo jamaicensis*). Coyote (*Canis latrans*) tracks were observed within sandy areas of the Zanja channel.

Special-Status Plants and Wildlife

Sensitive plants or wildlife were not observed or detected in the project area during the survey, and the area is currently considered likely to be unoccupied by sensitive plants and wildlife due to the high degree of disturbance present. Several of the trees, including gum, African sumac, and Peruvian pepper trees have potential to support raptor species and other nesting birds, but no existing nests or roosts were observed during the survey. The disturbed dirt and gravel portions of the project site provide suitable habitat for ground bird nesters, such as killdeer (*Charadrius vociferous*). These birds lay their eggs directly on compact or gravelly soil and remain there until the young hatch.

Burrowing owls, sign or potential burrows were not observed on the project site during the survey. The non-native grassland located southeast of the project site did not contain any abandoned California ground squirrel (*Otospermophilus beecheyi*) burrows that would facilitate burrowing owl occupancy. Although the project site may contain suitable foraging habitat for the species, it lacks suitable burrows or structures required for nesting and the species is not expected to occur.

The compact soils, gravelly areas, and lack of vegetation cover on the project site do not provide suitable habitat for San Bernardino kangaroo rat. The project site also occurs outside the known range of the species.

The federal Migratory Bird Treaty Act and California Fish and Game Code specify that migratory bird species are protected from being taken or possessed, including by indirect action due to tree removal, etc. Due to the number of trees and shrubs, and other potential nesting areas within and adjacent to the project area, there is a potential for birds to nest in and near the Project area. Birds nest seasonally, usually from around the beginning of March until the end of August.

Potential Waters of the U.S.

A jurisdictional delineation was prepared for the project site by Helix Environmental Planning (Helix 2015). The results of the jurisdictional delineation were reviewed for the preparation of this Initial Study, and conditions were determined to be the same. The Jurisdictional Delineation determined that the Zanja is a feature that contains areas jurisdictional to the USACE, CDFW, and RWQCB. The portion of the Zanja between 9th Street and Church Street is designated as a non-vegetated channel/streambed. Although no hydrophilic vegetation was evident within the channel during the survey, one re-sprouting mulefat was observed, which indicates that the channel is regularly cleared and maintained to prevent overgrowth of vegetation.

During ECORP's survey of the project area, the biologist identified a one-foot wide unvegetated erosional feature that originates from the road edge of Church Street. The feature conveys stormwater runoff from Church Street and runs west through the proposed location for the trail and north of the Zanja channel. The feature enters a damaged, but still functional, three-foot wide culvert in a dirt area of the proposed trail approximately 560 feet west of Church Street. The culvert conveys the feature south into the Zanja channel. It is probable that this erosional feature is non-jurisdictional due to it being a man-made channel located within an otherwise upland environment. This feature was not identified during Helix's jurisdictional delineation on the project in 2015.

Wildlife Movement Corridors

The Zanja was analyzed as a potential wildlife corridor because the channel traverses a heavily developed area, wildlife expected to potentially use the channel for movement would be those that are accustomed to the urban environment. Mammal species that could use such a corridor include mostly small to medium sized wildlife such as coyote (known due to evidence of tracks), desert cottontail (*Sylvilagus audubonii*), raccoon (*Procyon lotor*), and opossum (*Didelphus virginiana*). Several bird species could use such a wildlife corridor as well, but would be left with fewer movement constraints than many species due to their ability to fly across different habitat zones. Larger wildlife such as deer (*Odocoileus hemionus*) and mountain lion (*Felix concolor*) would be unexpected to use an urban corridor because of the human presence nearby.

Wildlife movement corridors usually contain some degree of cover and connect regional open space or undeveloped lands. The Zanja provides intermittent water sources for wildlife and is connected to the east of the project area with more of the same channel and additional suburban areas. The depth of the

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trapezoidal channel can provide both topographic cover for wildlife and provide some limited vegetative cover. Both the configuration of the channel topography and the available water source are potential attractants to wildlife. Upstream and to the east, the Zanja connects with several residential areas, a golf course, and the University of Redlands. Downstream and west of 9th Street, the Zanja is subterranean through a concrete box culvert five feet high by 10 feet wide, which can serve as a wildlife movement corridor. These dimensions are generally not suitable for larger game mammals, but are suitable for smaller mammal, reptile, amphibian, and bird species. Further downstream, the Zanja resurfaces 0.5 mile to the west near Eureka Street, and eventually joins the concrete channel that flows northwest and into the Santa Ana River.

Due to its dimensions, surrounding land uses, and connection to open spaces both up and downstream, the Zanja is expected to serve as a wildlife corridor but its use is expected to be restricted to urban adapted wildlife species.

4.4.2 Biological Resources (IV) Environmental Checklist and Discussion

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 Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

No plant or wildlife species listed as Threatened or Endangered by the U.S. Fish and Wildlife Service or CDFW were observed in the project area, and none are likely to be present due to the lack of native habitat. However, the project area has the potential to support nesting birds, including raptors and songbirds that are protected by the federal Migratory Bird Treaty Act and California Fish and Game Code. These laws specify that migratory bird species are protected from being taken or possessed, including by indirect action from tree removal, etc. If Proposed Project construction activities occur during the nesting bird season, there would be the potential for birds to be disturbed from any tree or shrub removal as well as noise, dust, etc. Mitigation Measure BIO-1 would ensure that impacts to nesting birds would be less than significant.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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Within the project area the Zanja is regularly cleared and maintained to prevent overgrowth of vegetation; therefore, it does not contain riparian vegetation. No other sensitive natural communities were identified in the project area during the field survey conducted for the Proposed Project (ECORP 2018a). No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The Zanja channel is a feature that contains areas jurisdictional to the USACE, CDFW, and RWQCB. The portion of the Zanja channel between 9th Street and Church Street is designated as a non-vegetated channel/streambed. As designed, the Proposed Project's elements would avoid the Zanja channel. Mitigation Measure BIO-2 would ensure that inadvertent disturbance of jurisdictional areas during construction is avoided.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

As described previously, the Zanja likely serves as a wildlife corridor to many small- to medium-sized urban-adapted wildlife species, including smaller mammals, reptiles, and amphibians. During the six-month construction period, the use of the Zanja corridor for wildlife movement would be impeded. Although construction would only occur during the day, and no construction would occur in the channel itself, increased human presence may still deter some animals from using the corridor. This impact is expected to be less than significant, however, because the corridor would be available for use immediately after the end of construction.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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As previously described, several ornamental non-native tree species surround the project site and include gum tree, African sumac, and Peruvian pepper tree. The current design of the Proposed Project would not remove any of these trees. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project area is not located in an area subject to a Habitat Conservation Plan. No impact would occur.

4.4.3 Mitigation Measures

BIO-1: If construction activities occur within the bird breeding season (February 1 through August 31) then a pre-construction nesting survey shall be conducted no more than 30 days prior to the start of construction by a qualified biologist. The nest survey shall include the project site and areas within 500 feet of the site that could be affected by construction activities that could generate indirect effects to nesting birds, such as noise, human activity, dust, etc. If active bird nests are found during the survey, and could be affected by construction activities, then the qualified biologist shall establish an appropriate buffer zone around the active nests based on the work activities, nesting species, and likelihood of the species being affected by construction activities. Buffers may typically be a 300-foot radius for songbirds and a 500-foot radius for raptors. Project activities shall be avoided within the buffer zone until the nest is deemed no longer active by the biologist. Weekly nesting surveys and biological monitoring may be necessary if nesting birds are found on the project site.

BIO-2: To ensure impacts to waters and habitats jurisdictional to the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife are avoided, an exclusion zone shall be staked by a qualified biologist prior to the commencement of ground-disturbing activities. The exclusion zone shall remain in place for the duration of construction, and the purpose of the exclusion zone shall be included in the construction worker daily briefings (tailgate meetings).

4.5 Cultural Resources

4.5.1 Environmental Setting

Cultural Resources

A Cultural Resources Inventory Report was prepared by ECORP Consulting, Inc. (ECORP 2018b) for the Proposed Project to determine if cultural resources were present in or adjacent to the Project area and assess the sensitivity of the Project area for undiscovered or buried cultural resources.

Literature Review. A cultural resources records search was conducted at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton, and a search of the Sacred Lands File was requested from the Native American Heritage Commission (NAHC). The records search results indicated that two cultural resources were documented within the project area: the Mill Creek Zanja itself (CA-SBR-8092H/P36-008092), which is listed on the National Register of Historic Places (NRHP), and the San Bernardino Motor Line of the Southern Pacific Railroad (CA-SBR-31266H/P36-031266), which was recommended eligible for the California Register of Historical Resources (CRHR). An additional 673 resources have been documented within one-mile radius of the project area. Two national/state historic districts are located within one-mile of the project area, which include Smiley Park and the Redlands Santa Fe Depot Districts.

The records search indicated that the project area had been previously surveyed in 1937, 1985 and 1988, and 36 additional cultural resources investigations were conducted within the one-mile records search radius between 1937 and 2016. The results of the search of the Sacred Lands File by the NAHC indicated the presence of a Native American cultural resource within one mile of the project area. This resource was later identified by the San Manuel Band of Mission Indians as the Mill Creek Zanja (CA-SBR-8092H/P36-008092). In addition to the search of the Sacred Lands File, the NAHC identified 20 Native American groups and individuals with historical and traditional ties to the project area.

Field Survey. As a result of the field survey, three historic-period isolated finds (ZJ-001-I, ZJ-002-I and ZJ-003-I) were documented, and two previously recorded and evaluated resources, the Mill Creek Zanja and the San Bernardino Motor Line of the Southern Pacific Railroad, were field checked and updated.

Evaluation for the CRHR

Isolated Finds. An evaluation using CRHR eligibility criteria was carried out for isolated finds ZJ-001-I, ZJ-002-I, and ZJ-003-I. Isolated finds are not eligible for inclusion in the CRHR, and are therefore not Historical Resources as defined by CEQA.

Mill Creek Zanja. The Mill Creek Zanja is a California Historical Landmark; a segment of the resource, located east of the project area, is listed on the NRHP (and is therefore eligible for the CRHR); and the entire length of the resource is considered a Sacred Land by local Native American communities. The section of the Mill Creek Zanja within the project site, located between 9th Street and Church Street in the City of Redlands, is not included in the NRHP-listed segment of this resource and has not been previously evaluated for inclusion in the CRHR. The NRHP Nomination Form ends the listed section at the western border of Sylvan Park arguing that west of Division Street the Zanja goes underground and no longer acts as a natural stream course. However, the portion of the Zanja within the current project site is still east of the area where the Zanja goes underground and retains a fair amount of integrity. Because of this, the portion of the Zanja within the project site was evaluated for eligibility for the CRHR.

The Zanja was constructed to provide irrigation water to the village of Guachama, and is among the earliest civil engineering projects in Southern California. In the latter part of the 19th century, settlement and development in the area occurred along the banks of the Zanja, as it was the only stable water source. Due to it being among the earliest civil engineering projects in the region, and its considerable

impact on the development and settlement patterns of the area, the resource is evaluated as eligible for the CRHR under Criterion 1.

As stated in the NRHP Nomination Form, construction of the ditch was accomplished by Native Americans from the village of Guachama under their chief, Solano. Due to the association of the resource with the Native American residents of Guachama and their chief Solano, the resource is evaluated as eligible for the CRHR under Criterion 2.

This segment of the Zanja consists of a v-shaped ditch with earthen banks with steeply sloped sides and a flat-bottomed bed containing large cobbles and boulders. This segment of the Zanja is of utilitarian design and was not constructed to exhibit high aesthetic values. It is a typical example of an irrigation ditch with no unique architectural or engineering design characteristics. The feature does not embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master or possesses high artistic values. Therefore, the resource is evaluated as not eligible for the CRHR under Criterion 3.

Given the nature of the resource, it does not possess the potential to yield any additional information regarding the historical significance, construction, or design of the Mill Creek Zanja that is not already represented in the archival record. Therefore, the resource does not have the potential to yield information important in history and is not eligible for the CRHR under Criterion 4.

A study of maps and historic aerial photographs reveals that this section of the Zanja follows the original alignment and course of the resource and it still functions as a water conveyance feature. This segment of the Zanja has received minor alterations since the time of its original construction, but such alterations do not compromise the integrity or detract from the significance of the Zanja. This segment of the Zanja retains integrity of location, design, setting, materials, workmanship, feeling, and association.

The segment of the Mill Creek Zanja from Church Street to 9th Street is eligible for listing under Criterion 1, for its impact on settlement of the area, and Criterion 2, for its association with Guachama chief Solano. This portion of the Mill Creek Zanja retains integrity and is recommended as eligible for inclusion in the CRHR. Therefore, it is considered a Historical Resource under CEQA.

San Bernardino Motor Line of the Southern Pacific Railroad. The San Bernardino Motor Line of the Southern Pacific Railroad was constructed in the late 19th Century to serve the needs of citrus packing houses in Redlands. At the time, citrus was the main industry in the growing community. The segment of the San Bernardino Motor Line in the project area lacks integrity (the tracks have been removed) and therefore is not a Historical Resource as defined by CEQA.

Paleontological Resources

A paleontological assessment was prepared by the Vertebrate Paleontology Section of the Los Angeles County Natural History Museum (Natural History Museum of Los Angeles County 2018) for the Proposed Project to determine if paleontological resources were present in or adjacent to the project area and assess the sensitivity of the project area for undiscovered paleontological resources. The entire project area is composed of soil and younger Quaternary alluvium deposited from the Crafton Hills to the east.

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Typically these types of deposits do not contain significant fossils and there are no vertebrate fossil records near the project site in these deposits.

4.5.2 Cultural Resources (V) Environmental Checklist and Discussion

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 as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

As previously described, the only historical resource as defined by CEQA located within the project site is the Mill Creek Zanja (ECORP 2018b). The Proposed Project would install a multi-use trail adjacent to the Zanja; therefore, the Proposed Project would not have any significant direct impacts on the Mill Creek Zanja. However, the Proposed Project has the potential to result in indirect impacts to the Mill Creek Zanja. Indirect impacts could include increased dust during trail installation, increased foot traffic and attention to the resource by the general public, and a change in the visual landscape/setting in the immediate vicinity of the resource. A temporary increase in dust is not likely to have a significant impact on the resource. The proposed foot trail may increase foot traffic and allow the public more accessibility to the resource; however, the area immediately surrounding the resource contains suburban developments and an informal walking path already exists alongside this portion of the Zanja. The small increase in pedestrian traffic would not likely create a significant impact on the resource. The Proposed Project would not result in a substantial change to the visual landscape or setting of the resource. The Proposed Project would not alter the features of the resource that make it eligible for the CRHR, its association with historical events. As such, although the Proposed Project may result in indirect impacts to the resource, these impacts would be less than significant.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The archaeological sensitivity of the project area is believed to be high. There may be subsurface historic-period artifacts or features within the project area related to the Zanja and the San Bernardino Motor Line of the Southern Pacific Railroad that may be disturbed during construction. Impacts would be less than significant with the implementation of CUL-1.

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Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The project site is located on younger Quaternary alluvium deposited from the Crafton Hills to the east. Excavations in this soil type are very unlikely to uncover any significant vertebrate fossils. Deeper excavations into older sedimentary deposits, however, could yield fossils. The project area has been disturbed from construction of the existing County flood control access road and paved parking lot, and the majority of project construction activities would not require very deep excavations. Impacts would be less than significant.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

In the unlikely event that human remains are discovered during construction, impacts would be less than significant with Mitigation Measure TCR-3.

4.5.3 Mitigation Measures

CUL-1: Archaeological Monitoring: Due to the heightened cultural sensitivity of the proposed project area, an archaeological monitor with at least 3 years of regional experience in archaeology shall be present for all ground-disturbing activities that occur within the proposed project. Ground disturbance is defined as any activity that compacts or disturbs the ground within a project area. The project area is defined as all areas where project activities will occur, including: the actual construction activities, permanent easements, temporary construction easements, staging areas for supplies and equipment, and borrow pits. Ground disturbance can also be caused by the use of hand tools (shovels, pick axe, posthole digger, etc.), heavy equipment (excavators, backhoes, bulldozers, trenching and earthmoving equipment, etc.), and heavy trucks (large four wheel drive trucks, dump trucks and tractor trailers, etc.). Trenching, bulldozing, excavating, scraping, and plowing are typical examples of ground disturbance activities. Project types that usually involve ground disturbance include acquisition/demolition/relocation of structures; vegetation management; landslide stabilization; and infrastructure projects such as utilities, storm water management, and flood control. However, any projects that include the installation of utilities, culverts, temporary roads or structures, permanent roads, foundations and footers all typically involve ground disturbance activities. A sufficient number of archaeological monitors shall be present each work day to ensure that simultaneously occurring ground disturbing activities receive thorough levels of monitoring coverage. A Monitoring and Treatment Plan that is

reflective of the project mitigation (“Cultural Resources” and “Tribal Cultural Resources”) shall be completed by the archaeologist and submitted to the Lead Agency for dissemination to the government representatives of consulting Tribes. Once all parties review and approve the plan, it shall be adopted by the Lead Agency – the plan must be adopted prior to permitting for the project. Any and all findings will be subject to the protocol detailed within the Monitoring and Treatment Plan.

4.6 Energy

4.6.1 Energy (VI) Environmental Checklist and Discussion

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 of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Construction of the Proposed Project would take approximately 6 months. Due to the short-term nature of the proposed construction and scope of the Proposed Project it is anticipated that fuel consumption during project construction would have a nominal effect on local and regional energy supplies, especially over the long-term. Additionally, construction equipment fleet turnover and increasingly stringent state and federal regulations on engine efficiency combined with state regulations limiting engine idling times and require recycling of construction debris, would further reduce the amount of transportation fuel demand during project construction. For these reasons, it is expected that construction fuel consumption associated with the Proposed Project would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature. For these reasons, this impact would be less than significant.

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

The Proposed Project would be designed in a manner that is consistent with relevant energy conservation plans designed to encourage development that results in the efficient use of energy resources. Relevant energy conservation plans specific to the City of Redlands include the City’s General Plan, specifically the Sustainable Community chapter.

An overarching goal of this chapter is to encourage energy conservation activities throughout the City, to be achieved through several policy provisions. Specifically, the following policy:

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

The Proposed Project would create a pedestrian trail through the downtown portion of the City which would offer residents an alternative form of transportation that is not dependent on non-renewable energy sources.

All development in the City of Redlands, including the Proposed Project, is required to adhere to all City-adopted policy provisions, including those contained in the General Plan Sustainable Community chapter. The City ensures all provisions of these policy documents are incorporated into projects and their permits through development review and applications of conditions of approval as applicable. The Proposed Project would not conflict or obstruct any local or state plans for renewable energy or energy efficiency.

For these reasons, this impact would be less than significant.

4.6.2 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.7 Geology and Soils

4.7.1 Environmental Setting

The project is located in the upper Santa Ana Valley region of southwestern San Bernardino County in the southern part of the Bunker Hill-San Timoteo Basin. The basin formed as a rift between the San Andreas Fault Zone on the northeast and the San Jacinto Fault Zone on the southwest. The project area is not located in an area subject to geologic hazards (City of Redlands 2017). The project area is underlain by Hanford coarse sandy loam 2 to 9 percent slopes, a well-drained soil with a low shrink-swell potential (USDA 2018; 1979).

Regional Seismicity and Fault Zones

An “active fault,” according to California Department of Conservation, Division of Mines and Geology, is a fault that has indicated surface displacement within the last 11,000 years. A fault that has not shown geologic evidence of surface displacement in the last 11,000 years is considered “inactive.” The City of Redlands is bound by the San Andreas Fault Zone to the north and the San Jacinto Fault Zone to the southwest. The City of Redlands is traversed by the Crafton Hills Fault Zone through the southern portion of the City. The project area is not located on or near a fault zone. The closest fault to the project site is the Redlands Fault located approximately one mile southeast of the project site.

4.7.2 Geology and Soils (VI) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

i through iv): The project site is located in the City of Redlands, which is between the active San Andreas and San Jacinto faults. Like most areas of southern California, the project site is subject to strong ground shaking during an earthquake. However, the project does not include housing or other habitable structures. Therefore, risk to people or structures from strong seismic ground shaking would be less than significant. The project site is not located within an Alquist-Priolo Zone or in an area subject to ground failure or landslide (City of Redlands 2017). No impact would occur from these hazards.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Because the Proposed Project would disturb more than one acre, it would be required to prepare a Storm Water Pollution Prevention Plan (SWPPP), which would include Best Management Practices (BMPs) to manage erosion and the loss of topsoil during construction-related activities. Impacts would be less than significant. During operation, a decomposed granite path and landscaping would reduce erosion from existing conditions resulting in a beneficial impact.

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Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Proposed Project would not be located on unstable soil. According to the City of Redlands General Plan, the project area is not susceptible to landslide, lateral spreading, liquefaction, or collapse. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project area is underlain by Hanford coarse sandy loam 2 to 9 percent slopes, a well-drained soil with a low shrink-swell potential (USDA 2018; 1979). Therefore, the Proposed Project would not be located on expansive soil. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Proposed Project does not include restrooms or otherwise require waste water disposal systems. No impact would occur.

4.7.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.8 Greenhouse Gas Emissions

As previously mentioned in Section 4.3 (Air Quality) of this Initial Study, an air quality and GHG report was recently prepared for the Zanja Trail and Greenway Project – Wabash Avenue to Lincoln Street (Rincon Consultants 2016). Due to the close proximity of this project, and because the Wabash Avenue to Lincoln Street segment includes a greater scope of work (see table 4.3-1), it was determined that the previously

prepared air quality and GHG study would be a conservative representation of potential air quality and GHG impacts that would result from the Proposed Project.

4.8.1 Environmental Setting

Climate change refers to changes in climate (such as wind patterns, precipitation, and storm frequency/intensity) over an extended period of time resulting from observed increases in the average temperature of the Earth’s atmosphere and oceans. Gases that absorb and re-emit infrared radiation in the atmosphere are called GHGs. The accumulation of GHGs in the atmosphere regulates the Earth’s temperature. Because GHGs absorb different amounts of heat, a common reference gas, carbon dioxide, (CO₂) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as “carbon dioxide equivalent” (CO₂e), and is the amount of a GHG emitted multiplied by its Global Warming Potential (GWP). Carbon dioxide has a 100-year GWP of one. By contrast, methane has a GWP of 25, meaning its global warming effect is 25 times greater than CO₂ on a molecule per molecule basis.

4.8.2 Greenhouse Gas Emissions (VII) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The air quality and GHG report prepared for the representative project found that the vast majority of individual projects do not generate sufficient GHG emissions to create significant project-specific environmental effects (Rincon Consultants 2016). However, a project’s contribution towards climate change typically involves an analysis of whether or not the project’s contribution toward climate change is cumulatively considerable. The GHG emissions associated with the representative project were calculated using CalEEMod. Because CalEEMod does not contain a trail project land use type, a city park land use type was used instead, which results in conservative GHG emissions would result from increases in vehicle miles traveled, water use, energy use, and landscape maintenance. Construction GHG emissions were estimated for the representative project at 83.5 metric tons CO₂e. Amortized over a 30-year period, construction of the representative project would generate approximately 2.8 metric tons CO₂e per year. Long term operational emissions were estimated to be approximately 4.2 metric tons CO₂e per year. Added together, the combined annual emissions would be approximately 15 metric tons CO₂e per year, well below the SCAQMD’s recommended GHG threshold of 3,000 metric tons CO₂e per year (Rincon Consultants 2016). As shown in table 4.3-1 above, the Proposed Project includes a smaller scope of development compared to the representative project. Based on this previous analysis, it can be determined that GHG impacts associated with the construction and operation of the Proposed Project would be the same or less than the representative project; and therefore, less than significant.

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Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The City of Redlands has selected a goal to reduce its community GHG emissions to a level that is 15 percent below its 2008 GHG emissions levels by 2020 as part of the San Bernardino Association of Governments' San Bernardino County Regional Greenhouse Gas Reduction Plan. The representative project was determined not to conflict with the goals of this plan (Rincon Consultants 2016). The Proposed Project is a trail project like the representative project and is anticipated that it would result in the same or less GHG emissions compared to the representative project. As such, the Proposed Project would not conflict with goals of the San Bernardino County Regional Greenhouse Gas Reduction Plan. No impact would occur.

4.8.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.9 Hazards and Hazardous Materials

4.9.1 Environmental Setting

The project site is located adjacent to the Zanja channel in residential and commercial neighborhoods in the City of Redlands. There are no known hazardous materials sites on or near the project area (DTSC 2018). The closest airport is the Redlands Municipal Airport, located approximately 2.3 miles northeast of the proposed alignment.

4.9.2 Hazards and Hazardous Materials (VIII) Environmental Checklist and Discussion

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Some hazardous materials, such as diesel fuel, would be used by heavy equipment at the site during construction. No fueling or maintenance of equipment would occur on the site. The use of such materials would not create a significant hazard to the public and impacts would be less than significant. No hazardous materials would be used after the construction of the Proposed Project. Impacts would be less than significant.

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Would the Project:

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?

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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During construction, some hazardous materials, such as diesel fuel, would be used. No fueling, repair, or maintenance would occur at the project site. A SWPPP would be prepared for the Proposed Project, and would list BMPs to prevent construction pollutants and products from violating any water quality standard or waste discharge requirements in the event of an accidental spill. The release of hazardous materials would be prevented through the implementation of BMPs listed in the SWPPP. Daily operation of the Proposed Project would not result in a new hazard to the public or the environment. Impacts would be less than significant.

Would the Project:

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Redlands High School is located 0.1 mile from the eastern end of the proposed trail alignment. As discussed in Section 4.3 Air Quality of this Initial Study, emissions from the Proposed Project's construction and operation would be less than the Localized Significance Thresholds established by the SCAQMD. The Proposed Project does not include handling of hazardous or acutely hazardous materials, substances or waste. A less than significant impact would occur.

Would the Project:

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?

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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A search of the Department of Toxic Substances Control EnviroStor database was conducted for the project area. The research revealed that no known hazardous material sites compiled pursuant to Government Code Section 65962.5 are located within the project area. As such, ground disturbing

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activities associated with the Proposed Project are not anticipated to encounter hazardous materials. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The closest airport to the project site is Redlands Municipal Airport located approximately 2.3 miles northeast of the project site. The Proposed Project is not within any safety zones for the airport. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f) Within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

There are no private airstrips within the vicinity of the project site. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The Proposed Project would require temporary closure of portions of 7th Street, 9th Street, and Church Street for short periods of time during construction. Impacts would be less than significant with the implementation of Mitigation Measure HAZ-1.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
urbanized areas or where residences are intermixed with wildlands?				

According to the City of Redlands General Plan, the project site is located in an area with a moderate fire threat level. However, the project site would be located in an urbanized area where wildland fires are not a risk. No impact would occur.

4.9.3 Mitigation Measures

HAZ-1: Prior to work in any City street, a Traffic Control Plan shall be submitted to the City of Redlands Engineering Department for review and approval. The Traffic Control Plan shall include measures to maintain emergency access to residences and structures in the vicinity of the project area.

4.10 Hydrology and Water Quality

4.10.1 Environmental Setting

The City of Redlands is in the Santa Ana River watershed, and all flows in the City’s Planning Area eventually lead to the Santa Ana River. In the project area, runoff flows to the Zanja channel. The project area is within a 100-year flood zone (City of Redlands 2017).

4.10.2 Hydrology and Water Quality (IX) Environmental Checklist and Discussion

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Proposed Project would not have storm water runoff issues that would violate any water quality standards or waste discharge requirements. A SWPPP, listing BMPs to prevent construction pollutants and products from violating any water quality standard or waste discharge requirements, would be prepared for the Proposed Project. Impacts would be less than significant. The Proposed Project would include a decomposed granite trail and landscaping, which would improve erosion conditions on the site during operation. A beneficial impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Would the Project:

such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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The Proposed Project would require water for landscaping, which would be obtained from the City's water supply. The Proposed Project would include drought tolerant landscaping, and it is not anticipated that groundwater supplies would be substantially depleted. A less than significant impact would occur.

Would the Project:

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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A SWPPP, listing BMPs to prevent construction pollutants and products from violating any water quality standard or waste discharge requirements, would be prepared for the Proposed Project. Impacts would be less than significant. The Proposed Project would include a decomposed granite trail and landscaping, which would improve erosion conditions on the site during operation. A beneficial impact would occur.

Would the Project:

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The Proposed Project would not alter the course of the Zanja channel, and drainage patterns would remain similar to existing conditions. The Proposed Project would not cause flooding on- or off-site. No impact would occur.

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Would the Project:

e) 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?

Potentially Significant Impact Less than Significant with Mitigation Incorporated Less than Significant Impact No Impact

A SWPPP, listing BMPs to prevent construction pollutants and products from violating any water quality standard or waste discharge requirements, would be prepared for the Proposed Project. Impacts would be less than significant. The Proposed Project would include a decomposed granite trail and landscaping, which would improve erosion conditions on the site during operation. A beneficial impact would occur.

Would the Project:

f) Otherwise substantially degrade water quality?

Potentially Significant Impact Less than Significant with Mitigation Incorporated Less than Significant Impact No Impact

The Proposed Project would implement a SWPPP listing BMPs to prevent construction pollutants and products from violating any water quality standards. Impacts would be less than significant.

Would the Project:

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

Potentially Significant Impact Less than Significant with Mitigation Incorporated Less than Significant Impact No Impact

The project site is within a 100-year flood hazard area, but would not include housing. No impact would occur.

Would the Project:

h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?

Potentially Significant Impact Less than Significant with Mitigation Incorporated Less than Significant Impact No Impact

The Proposed Project would place structures related to multipurpose trail uses within the 100-year flood hazard area, including directional signage, gateway monument, post and rail fence, trash receptacle, and other park amenities. These structures would not impede or redirect flood flows. A less than significant impact would occur.

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Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Proposed Project would be subject to flooding during a 100-year flood. However, flooding of the trails would not be expected to expose people or structures to a significant risk of loss, injury, or death. A less than significant impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
j) Be subject to inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project area is relatively flat and would not be located in an area subject to mudflow. The project area is located approximately 50 miles northeast of the Pacific Ocean. Due to the distance to the ocean the project area would not be subject to inundations from seiches or tsunamis. No impact would occur.

4.10.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.11 Land Use and Planning

4.11.1 Environmental Setting

The western half (7th Street to 9th Street) of the project area would be located in a paved parking lot and vacant disturbed lot north of the Hatfield Buick dealer and south of a religious facility and office building. The eastern half (9th Street to Church Street) of the project area would be located adjacent to the Zanja north of an established multiple-family residential neighborhood. This area currently contains an existing County flood control access road.

4.11.2 Land Use and Planning (X) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Proposed Project would be located partially within an existing parking lot between 7th Street and 9th Street and follow an existing County flood control access road from 9th Street to Church Street. The

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Proposed Project would not divide an established community. The Proposed Project would help connect residential neighborhoods to the downtown area of Redlands. A beneficial impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Proposed Project would be constructed in areas designated as Linear Park, Parks/Golf Courses, and Commercial/Industrial on the City General Plan. Trail uses are allowed in all of these land use types. The construction of the trail would help meet the goals of the General Plan. A beneficial impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The City of Redlands is not subject to a habitat conservation plan or natural community conservation plan. No impact would occur.

4.11.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.12 Mineral Resources

4.12.1 Environmental Setting

The project site is not used for mining, and would not be located in a known Mineral Resources Zone (City of Redlands 2017).

4.12.2 Mineral Resources (XI) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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According to the City of Redlands General Plan the project site is not located in a Mineral Resource Zone. The Proposed Project would begin at 7th Street and end at Church Street and would construct a pedestrian trail from 7th street to 9th street and a multipurpose trail from 9th street to Church Street. The Proposed Project would not include mining activities. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Proposed Project would not result in a loss of a locally-important mineral resource recovery site (City of Redlands 2018). No impact would occur.

4.12.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.13 Noise

Land uses sensitive to noise are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as parks, historic sites, cemeteries, and recreation areas are considered sensitive to increases in exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are also considered noise-sensitive land uses.

The nearest sensitive receptors to the project site include the religious facility adjacent to the western half of the alignment between 7th Street and 9th Street and the residences south of the Zanja between 9th Street and Church Street.

4.13.1 Noise (XII) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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Noise generated by the construction of the Proposed Project would be temporary and no permanent noise sources would be created. Construction activities would take place within permitted hours (7:00 A.M. to 6:00 P.M. Monday through Saturday) and would be exempt per the City of Redlands Municipal Code Noise Ordinance 8.06.120. Operation of the Proposed Project would not include noise sources that would generate noise levels in excess of standards established in the City's General Plan or noise ordinance. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Proposed Project does not include elements that would generate groundborne vibration or noise. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Due to the temporary nature of construction activities, no permanent increases in ambient noise levels in the project area are expected. The Proposed Project does not include elements that would result in a substantial increase in ambient noise levels. Operational noise would be similar to current conditions. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Construction of the Proposed Project would generate short-term noise levels associated with the use of heavy equipment and other construction activity. The nearest sensitive receptors to the project site include the religious facility adjacent to the western half of the alignment between 7th Street and 9th Street and the residences south of the Zanja between 9th Street and Church Street. Construction of the Proposed Project would take approximately 6 months. Mitigation Measure NOI-1 would reduce impacts from temporary construction noise to a less than significant level.

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Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Proposed Project would not be located within the Airport Land Use Compatibility Plan for Redlands Municipal Airport. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

There are no private airstrips in the vicinity of the Proposed Project. No impact would occur.

4.13.2 Mitigation Measures

NOI-1: The applicant shall limit construction activities to the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday with no construction activities permitted on weekends and Federal holidays. Project contractors shall ensure that all construction equipment, fixed or mobile, shall be operated with properly functioning and maintained mufflers, consistent with manufacturer standards. Stationary construction equipment shall be located as far away from residences or religious institutions as is practical.

4.14 Population and Housing

4.14.1 Population and Housing (XIII) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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The Proposed Project does not include new homes or businesses. The Proposed Project would include new park infrastructure to serve existing neighborhoods. Substantial population growth would not occur. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Proposed Project would be located adjacent to the Zanja channel in disturbed and paved areas. The Proposed Project involves the construction of a trail segment and would not displace housing. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Proposed Project would not include the removal of housing; and therefore, would not displace people. No impact would occur.

4.14.2 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.15 Public Services

4.15.1 Environmental Setting

Police, fire and other public services in the project area are provided by the City of Redlands. School services are provided by the Redlands Unified School District.

4.15.2 Public Services (XIV) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) 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:				
Fire Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other Public Facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Proposed Project would not create a substantial new fire or public safety hazard. The Proposed Project is the provision of a new City trail. The Proposed Project would be beneficial to the City of Redlands by providing updated public facilities. This facility is included in the City’s General Plan, and accounted for when determining performance objectives for public services. The Proposed Project is not expected to induce population growth; therefore, there would be no additional demand for schools, parks, or other public facilities. The Proposed Project would not result in the need for new or physically altered government facilities nor affect response time or other performance objectives. A less than significant impact would occur.

4.15.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.16 Recreation

4.16.1 Environmental Setting

The Proposed Project is identified in the City’s General Plan as a linear park (City of Redlands 2018). The closest existing park to the project site is Sylvan Park, located approximately 0.2 mile from the proposed Project.

4.16.2 Recreation (XV) Materials Checklist

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Proposed Project would not increase the use of existing neighborhood or regional parks or other recreational facilities such that physical deterioration would occur or be accelerated. The proposed segment of the Zanja trail may increase use of the overall trail. However, this increase in use has been anticipated in the design of the trail, and a less than significant impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The Proposed Project is the construction of new recreational facilities. The environmental impacts of construction and operation of the Proposed Project, including required mitigation measures, are discussed in this Initial Study.

4.16.3 Mitigation Measures

Mitigation measures required for the Proposed Project are provided in the appropriate sections of this Initial Study.

4.17 Transportation/Traffic

A traffic memorandum was prepared for the Proposed Project by Hernandez, Kroone & Associates (HKA 2018). The results of the traffic memorandum are summarized in the following responses.

4.17.1 Transportation/Traffic (XVI) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?				

The Proposed Project would not conflict with current applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. Project trip generation was estimated to be less than 10 trips a weekday. This estimated trip generation is less than the average daily fluctuation of traffic volumes (HKA 2018). This low number of average daily vehicular trips would have minimum impact on intersections, streets, highways, freeways, pedestrian and bicycle paths, and mass transit. A less than significant impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Proposed Project would comply with the San Bernardino Associated Government's (SANBAG's) Congestion Management Plan. The estimated trips are far below the average daily fluctuation of traffic counts. A less than significant impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

There are no airport or air transit facilities near the project site. The Proposed Project would not include changes in air traffic patterns. No impact would occur.

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Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The Zanja Trail would intersect with 7th Street, 9th Street and Church Street which may result in an increase to potential hazards for trail users using these street crossings. With the implementation of Mitigation Measure TRANS-1 impacts would be less than significant.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The Proposed Project would require temporary closure of portions of 7th Street, 9th Street, and Church Street for short periods of time during construction. Impacts would be less than significant with the implementation of Mitigation Measure HAZ-1 (see Section 4.8.3).

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The nearest bus stop to the project site is OmniTrans Route 19 located on Citrus Avenue, about 1,000 feet south of Church Street at the Zanja Trail, and OminTrans Route 8 located on Orange Street, about 1,000 feet west of 7th Street at the Zanja Trail. Some pedestrian might use these transit routes and existing sidewalks or roads to reach the proposed trail. No impact would occur.

4.17.2 Mitigation Measures

TRANS-1: The final design of traffic and pedestrian control features at trail’s intersection with 7th Street, 9th Street, and Church Street shall be approved by the City Engineer prior to encroachment permit issuance. These design features could include, but are not limited to, removable lockable bollards at the trail entrances, colored stamped concrete, and signage.

4.18 Tribal Cultural Resources

4.18.1 Environmental Setting

The project area is located within the territory known to have been occupied by the Serrano group of Native Americans at the time of contact with Europeans, around AD 1769. The Serrano occupied an area in and around the San Bernardino Mountains and northward into the Mojave Desert. Their territory also extended west along the north slope of the San Gabriel Mountains, east as far as Twentynine Palms, north into the Victorville and Lucerne Valley areas, and south to the Yucaipa Valley and San Jacinto Valley. The Serrano speakers in the Mojave Desert who lived along the Mojave River were known as Vanyume. Serrano is a language within the Takic family of the Uto-Aztecan language stock (ECORP 2018b).

The Serrano were mainly hunters and gatherers who occasionally fished. Game that was hunted included mountain sheep, deer, antelope, rabbits, small rodents, and various birds, particularly quail. Vegetable staples consisted of acorns, pinyon nuts, bulbs and tubers, shoots and roots, juniper berries, mesquite, barrel cacti, and Joshua tree (ECORP 2018b).

A variety of materials were used for hunting, gathering, and processing food, as well as for shelter, clothing, and luxury items. Shells, wood, bone, stone, plant materials, and animal skins and feathers were used for making baskets, pottery, blankets, mats, nets, bags and pouches, cordage, awls, bows, arrows, drills, stone pipes, musical instruments, and clothing (ECORP 2018b).

Settlement locations were determined by water availability, and most Serranos lived in villages near water sources. Houses and ramadas were round and constructed of poles covered with bark and tule mats. Most Serrano villages also had a ceremonial house used as a religious center. Other structures within the village might include granaries and sweathouses (ECORP 2018b).

Serrano social and political units were clans, patrilineal exogamous territorial groups. Each clan was led by a chief who had both political and ceremonial roles. The chief lived in a principal village within the clan's territory. The clans were part of a moiety system such that each clan was either a wildcat or coyote clan and marriages could only occur between members of opposite moieties. On the north side of the San Bernardino Mountains, clan villages were located along the desert-mountain interface on Deep Creek, on the upper Mojave River, in Summit Valley, and in Cajon Pass. The principal plant food available near these villages was juniper berries. These villages also had access to mountain resources, such as acorns and pinyon nuts.

Vanyume villages were located along the Mojave River from south of Victorville to Soda Lake. These river villages had populations of 40 to 80 people. Marriage ties between the Serrano foothill villages and Vanyume desert villages facilitated access to mountain resources, such as acorns and pinyon nuts, by the desert villages. The principal desert resources were mesquite beans, screw beans, tule reed roots, and carrizo grass sugar (produced by aphids that lived on the Carrizo grass). Animal resources were rabbits, jackrabbits, desert bighorn sheep, pronghorn, and desert tortoise. The Vanyume also collected salt from Soda Lake and from the Barstow-Daggett area to exchange for acorns and other resources from the mountains (ECORP 2018b).

Partly due to their mountainous and desert inland territory, contact between Serrano and European-Americans was minimal prior to the early 1800s. In 1819, an asistencia (mission outpost) was established near present-day Redlands and was used to help relocate many Serrano to Mission San Gabriel. However, small groups of Serrano remained in the area northeast of the San Geronio Pass and were able to preserve some of their native culture. Today, most Serrano live either on the Morongo or San Manuel reservations (ECORP 2018b).

4.18.2 Regulatory Setting

Assembly Bill 52

Effective July 1, 2015, Assembly Bill 52 (AB 52) amended CEQA to require that: 1) a lead agency provide notice to those California Native American tribes that requested notice of projects proposed by the lead agency; and 2) for any tribe that responded to the notice within 30 days of receipt with a request for consultation, the lead agency must consult with the tribe. Topics that may be addressed during consultation include Tribal Cultural Resources (TCRs), the potential significance of project impacts, type of environmental document that should be prepared, and possible mitigation measures and project alternatives.

Pursuant to AB 52, Section 21073 of the Public Resources Code defines California Native American tribes as “a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of the Statutes of 2004.” This includes both federally and non-federally recognized tribes.

Section 21074(a) of the Public Resource Code defines TCRs for the purpose of CEQA as:

1. Sites, features, places, cultural landscapes (geographically defined in terms of the size and scope), sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
 - a. included or determined to be eligible for inclusion in the California Register of Historical Resources; and/or
 - b. included in a local register of historical resources as defined in subdivision (k) of Section 5020.1; and/or
 - c. 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

Because criteria a and b also meet the definition of a historical resource under CEQA, a TCR may also require additional consideration as a historical resource. TCRs may or may not exhibit archaeological, cultural, or physical indicators.

Recognizing that California tribes are experts in their tribal cultural resources and heritage, AB 52 requires that CEQA lead agencies provide tribes that requested notification an opportunity to consult at the commencement of the CEQA process to identify TCRs. Furthermore, because a significant effect on a TCR is considered a significant impact on the environment under CEQA, consultation is used to develop appropriate avoidance, impact minimization, and mitigation measures.

4.18.3 Summary of AB 52 Consultation

The City of Redlands notified the Morongo Band of Mission Indians, the Gabrieleño Band of Mission Indians – Kizh Nation, the San Manuel Band of Mission Indians, the Soboba Band of Luiseño Indians, and the Torres Martinez Desert Cahuilla Indians of the Proposed Project in accordance to AB 52 via letters sent on May 28, 2019. Each recipient was provided a brief description of the project and its location, the lead agency contact information, and a notification that the tribe has 30 days to request consultation.

As a result of the initial notification letters, the Morongo Band of Mission Indians (Morongo), San Manuel Band of Mission Indians (San Manuel), and the Soboba Band of Luiseño Indians (Soboba) requested to consult with the City about the project pursuant to Public Resources Code section 21080.3.1. No responses to the notification letter were received from Gabrieleño Band of Mission Indians – Kizh Nation or the Torres Martinez Desert Cahuilla Indians.

Soboba. On July 1, 2019, the Soboba requested to consult on the project via an email and an attached letter. On July 8, 2019, the City initiated consultation with the Soboba via an initiation letter. On July, 29, 2019, the Tribe provided the City with mitigation measures taken from a 2016 IS/MND prepared for separate section of the Zanja Trail and Greenway Project. The City responded via an email on August 5, 2019 confirming receipt of the mitigation measures and informing the Tribe that more recent mitigation language for the project had been provided by San Manuel. The City asked the Soboba to review the San Manuel mitigation language to see if it met their requirements and provide comments. On August 5, 2019, the Soboba provided comments and edits to the new mitigation measures drafted by the San Manuel. On August 29, 2019, the City provided revised mitigation language to the Soboba for final review. The revised language incorporated all but one of the Soboba's requested additions and edits. The City did not remove the language requiring a rotating schedule for Tribal monitors as had been requested by the Tribe. The City cited concerns about the financial responsibility of this request. On September 16, 2019, the Soboba responded that they reviewed the revised mitigation measures and understood the City's concern regarding financial responsibility of removing the requirement for a rotating monitoring schedule. The Tribe did not agree with the rotating schedule but acknowledged that the City would likely move forward anyway. In that event, the Tribe requested that that the Soboba be included in the first round of the monitoring rotation, be included in the preparation of the Monitoring and Treatment Plan, and that the Tribe will receive a weekly summary of activities from the archaeologist during construction. On October 3, 2019, consultation was terminated without agreement via a letter sent to the Tribe containing the final mitigation measures. In the letter the City agreed to the three requests and confirmed that the that the Soboba will be included in the first round of the monitoring rotation, in the preparation of the Monitoring and Treatment Plan, and that the Tribe will receive a weekly summary emails during construction.

San Manuel. On June 6, 2019, the San Manuel responded to the notification letter, requested consultation and stated that the Mill Creek Zanja is a San Manuel Sacred Land and an NRHP-listed resource. In addition, they requested copies of the cultural report, paleontological report, geotechnical report, and plans for the project. On July 8, 2019, the City initiated consultation with the San Manuel via an initiation letter. Copies of the requested documents were supplied with the initiation letter. A meeting was scheduled between the City and Tribe for Monday July 29, 2019. On July 23, 2019, the San Manuel sent an email to the City stating that, following the review of the cultural resources report, they consider any impact to the Zanja, which is a TCR, to be significant, and that they agree with the recommendation for construction monitoring. In addition the Tribe provided mitigation measures for the project that would minimize impacts to the Zanja from the project. The meeting between the City and the Tribe was subsequently cancelled while the City reviewed the mitigation measures. On August 16, 2019, the City provided the San Manuel with a version of the mitigation measures that included revisions requested by the Soboba. On August 19, 2019, the Tribe accepted the mitigation measures with the revisions. The consultation was terminated via a letter sent on September 25, 2019, after the parties agreed to appropriate mitigation measures.

Morongo. On June 18, 2019, the Morongo requested to consult on the project via an email. In addition, they requested a copy of all cultural studies related to the project. On July 8, 2019, the City initiated consultation with the Morongo Band of Mission Indians via an initiation letter along with a copy of the cultural resources technical report for the project. A follow-up email was sent to the Tribe on July 23, 2019 checking in on their review of the project documents. On August 5, 2019, a second follow-up email was sent containing a copy of the proposed mitigation measures supplied by the San Manuel Band for the Tribe’s review and comment. On August 7, 2019, the Tribe responded that they concurred with the language in the mitigation measures and they may conclude consultation. On August 16, 2019, revised mitigation measures with Soboba edits were sent to the Tribe for review. The Tribe responded on August 29, 2019 that the revised mitigation measures were acceptable. The consultation was terminated via a letter sent on September 25, 2019, after the parties agreed to appropriate mitigation measures.

4.18.4 Tribal Cultural Resources (XVII) Environmental Checklist and Discussion

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 California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<p>register of historical resources as defined in Public Resources Code Section 5020.1(k), or</p> <p>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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>i. The project area includes a 1,016-foot long section of the Mill Creek Zanja. A six-mile segment of the Zanja located east of the project area is listed on the National Register of Historic Places (NRHP; NRHP-L-77-329) and is on the list of California Historical Landmarks (No. 43) (ECORP 2018b). The NRHP-listed segment stretches from the intake at Mill Creek and ends just west of Sylvan Park. The section of the Mill Creek Zanja within the project area, located between 9th Street and Church Street, is not included in the NRHP-listed segment of this resource. As part of the Proposed Project, this portion of the Mill Creek Zanja was updated and evaluated for inclusion in the CRHR. The evaluation recommended this resource as eligible for inclusion in the CRHR.</p> <p>The Proposed Project would install a multi-use trail adjacent to the Zanja; therefore, the Proposed Project would not have any significant direct impacts on the Mill Creek Zanja. However, the Proposed Project has the potential to result in indirect impacts to the Mill Creek Zanja. Indirect impacts could include increased dust during trail installation, increased foot traffic and attention to the resource by the general public, and a change in the visual landscape/setting in the immediate vicinity of the resource. A temporary increase in dust is not likely to have a significant impact on the resource. The proposed foot trail may increase foot traffic and allow the public more accessibility to the resource; however, the area immediately surrounding the resource contains suburban developments and an informal walking path already exists alongside this portion of the Zanja. The small increase in pedestrian traffic would not likely create a significant impact on the resource. The Proposed Project would not result in a substantial change to the visual landscape or setting of the resource. The Proposed Project would not alter the features of the resource that make it eligible for the CRHR, its association with historical events. As such, although the Proposed Project may result in indirect impacts to the resource, these impacts would be less than significant.</p>				
<p>ii. The Soboba and the Morongo identified the Zanja as a TCR and identified the project area as being sensitive with the potential to contain unknown TCRs. Significant impacts may occur from</p>				

the disturbance of known and unknown TCRs during ground disturbing construction activities associated with the Proposed Project. Impacts to TCRs would be less than significant with the implementation of Mitigation Measures TCR-1, TCR-2, and TCR-3

4.18.5 Mitigation Measures

TCR-1: Tribal Monitoring: Due to the heightened cultural sensitivity of the proposed project area, Tribal monitors representing the consulting Tribes shall be present, on a rotating basis, for all ground-disturbing activities that occur within the proposed project. Ground disturbance is defined as any activity that compacts or disturbs the ground within a project area. The project area is defined as all areas where project activities will occur, including: the actual construction activities, permanent easements, temporary construction easements, staging areas for supplies and equipment, and borrow pits. Ground disturbance can also be caused by the use of hand tools (shovels, pick axe, posthole digger, etc.), heavy equipment (excavators, backhoes, bulldozers, trenching and earthmoving equipment, etc.), and heavy trucks (large four wheel drive trucks, dump trucks and tractor trailers, etc.). Trenching, bulldozing, excavating, scraping, and plowing are typical examples of ground disturbance activities. Project types that usually involve ground disturbance include acquisition/demolition/relocation of structures; vegetation management; landslide stabilization; and infrastructure projects such as utilities, storm water management, and flood control. However, any projects that include the installation of utilities, culverts, temporary roads or structures, permanent roads, foundations and footers all typically involve ground disturbance activities. A sufficient number of Tribal monitors shall be present each work day to ensure that simultaneously occurring ground disturbing activities receive thorough levels of monitoring coverage. A Monitoring and Treatment Plan that is reflective of the project mitigation (“Cultural Resources” and “Tribal Cultural Resources”) shall be completed by the archaeologist, as detailed within CUL-1, and submitted to the Lead Agency for dissemination to the government representatives of consulting Tribes. Once all parties review and agree to the plan, it shall be adopted by the Lead Agency – the plan must be adopted prior to permitting for the project. Any and all findings will be subject to the protocol detailed within the Monitoring and Treatment Plan.

TCR-2: Treatment of Cultural Resources: If a pre-contact and/or post-contact cultural resource is discovered during project implementation, ground disturbing activities shall be suspended 60 feet around the resource(s) and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. Representatives from the consulting Tribal governments, the Archaeological Monitor/applicant, and the Lead Agency shall confer regarding treatment of the discovered resource, as detailed within the Monitoring and Treatment Plan. A research design shall be developed and will include a plan to evaluate the resource for significance under CRHR criteria, as well as its potential as a Tribal Cultural Resource (TCR).

Should any significant resource(s) not be a candidate for avoidance or preservation in place, and the removal of the resource(s) is necessary to mitigate impacts, the research design shall include a comprehensive discussion of limited non-destructive sampling strategies, resource processing, analysis, and reporting protocols/obligations. Removal of any cultural resource(s) shall be conducted with the presence of a Tribal monitor representing the consulting Tribes, unless

otherwise decided by government representatives of the consulting Tribes. All plans for analysis shall be reviewed and approved by the applicant and government representatives of the consulting Tribes prior to implementation, and all removed material shall be temporarily curated on-site. It is the preference that removed cultural material be reburied as close to the original find location as possible. However, should reburial within/near the original find location during project implementation not be feasible, then a reburial location for future reburial shall be decided upon by the consulting Tribes, the landowner, and the Lead Agency, and all finds shall be reburied within this location. Additionally, in this case, reburial shall not occur until all ground-disturbing activities associated with the project have been completed, all monitoring has ceased, all cataloguing and basic recordation of cultural resources have been completed, and a final monitoring report has been issued to Lead Agency, CHRIS, and consulting Tribes. All reburials are subject to a reburial agreement that shall be developed between the landowner and government representatives of the consulting Tribes outlining the determined reburial process/location, and shall include measures and provisions to protect the reburial area from any future impacts (vis a vis project plans, conservation/preservation easements, etc.).

Should it occur that avoidance, preservation in place, and on-site reburial are not an option for treatment, the landowner shall relinquish all ownership and rights to this material and confer with government representatives of the consulting Tribes to identify an American Association of Museums (AAM)-accredited facility within the County that can accession the materials into their permanent collections and provide for the proper care of these objects in accordance with the 1993 CA Curation Guidelines. A curation agreement with an appropriate qualified repository shall be developed between the landowner and museum that legally and physically transfers the collections, along with title and associated records to the facility. This agreement shall stipulate the payment of fees necessary for permanent curation of the collections and associated records and the obligation of the Project developer/applicant to pay for those fees.

All draft records/reports containing the significance and treatment findings and data recovery results shall be prepared by the archaeologist and submitted to the Lead Agency and government representatives of the consulting Tribes for their review and comment within 30 days of receipt. After approval from all parties, the final reports and site/isolate records are to be submitted to the local CHRIS Information Center, the Lead Agency, and consulting Tribes.

TCR-3: Inadvertent Discoveries of Human Remains/Funerary Objects: In the event that any human remains are discovered within the project area, ground disturbing activities shall be suspended 100 feet around the resource(s) and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. The on-site lead/foreman shall then immediately notify the government representatives of the consulting Tribes, the applicant/developer, and the Lead Agency. The Lead Agency and the applicant/developer shall then immediately contact the County Coroner regarding the discovery. If the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner shall ensure that notification is provided to the NAHC within twenty-four (24) hours of the determination, as required by California Health and Safety Code § 7050.5 (c). The NAHC-identified

Most Likely Descendant (MLD), shall be allowed, under California Public Resources Code § 5097.98 (a), to (1) inspect the site of the discovery and (2) make determinations as to how the human remains and funerary objects shall be treated and disposed of with appropriate dignity. The MLD, Lead Agency, and landowner agree to discuss in good faith what constitutes "appropriate dignity" as that term is used in the applicable statutes. The MLD shall complete its inspection and make recommendations within forty-eight (48) hours of the site visit, as required by California Public Resources Code § 5097.98.

Reburial of human remains and/or funerary objects (those artifacts associated with any human remains or funerary rites) shall be accomplished in compliance with the California Public Resources Code § 5097.98 (a) and (b). The MLD in consultation with the landowner, shall make the final discretionary determination regarding the appropriate disposition and treatment of human remains and funerary objects. All parties are aware that the MLD may wish to rebury the human remains and associated funerary objects on or near the site of their discovery, in an area that shall not be subject to future subsurface disturbances. The applicant/developer/landowner should accommodate on-site reburial in a location mutually agreed upon by the Parties.

It is understood by all Parties that unless otherwise required by law, the site of any reburial of Native American human remains or cultural artifacts shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code § 6254 (r).

4.19 Utilities and Service Systems

4.19.1 Environmental Setting

Water, wastewater, and solid waste service in the project area are provided by the City of Redlands.

4.19.2 Utilities and Service Systems (XVIII) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Proposed Project would not exceed wastewater treatment requirements of the Regional Water Quality Control Board. No impact would occur.

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Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Proposed Project would require minimal water for landscaping. No restrooms are proposed. The Proposed Project would not require the construction of new water or wastewater treatment facilities or expansion of existing facilities. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Proposed Project would not exceed the capacity of the existing stormwater system. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Proposed Project would use City water for landscaping. No restrooms are proposed. Existing entitlements and resources are sufficient to serve the Proposed Project and no new or expanded entitlements are needed. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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The Proposed Project does not include restrooms, and would not affect the wastewater treatment plant capacity. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Proposed Project would include trash and dog waste receptacles. The City's landfill has sufficient permitted capacity to accommodate the Proposed Project's solid waste disposal needs. A less than significant impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Proposed Project would comply with federal, state, and local statutes and regulations related to solid waste during construction and operation. No impact would occur.

4.19.3 Mitigation Measures

No significant impacts were identified, and no mitigation measures are required.

4.20 Wildfire

4.20.1 Environmental Setting

The project site is not located on land within a State Responsibility Area (SRA) (CAL FIRE 2019). According to the City of Redlands General Plan, the project site is located in an area with little or no fire threat (City of Redlands 2017).

4.20.2 Wildfire (XX) Environmental Checklist and Discussion

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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The project site is not located within or near a SRA (CAL FIRE 2019). Furthermore, the City of Redlands General Plan classifies the project area as *"Little or No Threat"* fire hazard (City of Redlands 2017). No impact would occur.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Proposed Project is located in a developed area characterized mostly commercial development. The project site is not located within or near a SRA (CAL FIRE 2019). Furthermore, the City of Redlands General Plan classifies the project area as *"Little or No Threat"* fire hazard (City of Redlands 2017). No impact would occur.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site is not located within or near a SRA (CAL FIRE 2019). Furthermore, the City of Redlands General Plan classifies the project area as *"Little or No Threat"* fire hazard (City of Redlands 2017). No impact would occur.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site is not located within or near a SRA (CAL FIRE 2019). Furthermore, the City of Redlands General Plan classifies the project area as *"Little or No Threat"* fire hazard (City of Redlands 2017). No impact would occur.

4.21 Mandatory Findings of Significance

4.21.1 Mandatory Findings of Significance (XIX.) Environmental Checklist and Discussion

Does the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have the potential to 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, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impacts to biological resources and cultural resources are discussed above. Impacts would be less than significant with Mitigation Measures BIO-1, BIO-2, and CUL-1.

Does the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impacts from the Proposed Project would not be cumulatively considerable with the implementation of the Mitigation Measures listed in this Initial Study.

Does the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Direct and indirect impacts to human beings would be less than significant with the implementation of mitigation measures listed in this Initial Study.

SECTION 5.0 LIST OF PREPARERS

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SECTION 7.0 APPENDICES

Appendix A – Air Quality and Greenhouse Gas Study

Appendix B – Biological Resources Assessment

Appendix C – Jurisdictional Delineation Report

Appendix D – Cultural Resources Inventory and Evaluation

Appendix E – Paleontological Records Search

Appendix F – Traffic Memorandum

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APPENDIX A

Air Quality and Greenhouse Gas Study

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APPENDIX B

Biological Resources Assessment

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APPENDIX C

Jurisdictional Delineation Report

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Cultural Resources Inventory and Evaluation

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Paleontological Records Search

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APPENDIX F

Traffic Memorandum

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