

CITY OF REDLANDS

ENVIRONMENTAL CHECKLIST FORM AND INITIAL STUDY

1. **Project Title:** PulteGroup - Citrus Estates TTM No. 20473
2. **Lead Agency Name and Address:**
City of Redlands
Development Services Department
35 Cajon Street, Suite 20
Redlands, CA 92373
3. **Contact Person and Phone Number:**
Jocelyn Torres
Associate Planner
(909) 798-7555, Ext. 1797
4. **Project Location:** The Project Site is in the city of Redlands, San Bernardino County. The 37.9-acre property is bounded by Wabash Avenue to the east, San Bernardino Avenue to the north, Capri Avenue to the south, and to the west by an existing residence and vacant land east of the intersection of Capri Avenue and Granite Street. The Assessor's Parcel Number (APN) is 0168-132-05. The Project Site is in the northeastern portion of the city of Redlands (see Figure 1 - Regional Vicinity).
5. **Project Sponsor's Name and Address:**
Pulte Group
Attn: Patric Lynam
27401 Los Altos, Suite 400
Mission Viejo, California 92691
6. **General Plan Designation:** Very Low Density Residential
7. **Zoning:** Residential Estate District (R-E)
8. **Project Description:** Pulte Group (Project Applicant) is requesting approval from the City of Redlands for a Tentative Tract Map (TTM No. 20473) and Planned Residential Development (PRD) to develop a 37.9-acre parcel, into 98 single-family residential lots and 20 lettered lots. The Proposed Project is known as Citrus Estates.

The Project Site is generally flat, gently sloping from east to west with an elevation of approximately 1,550 feet above mean sea level (amsl) in the northwestern corner to

1,610 feet amsl in the southeastern corner. Where vegetation is present, it is dominated by ruderal (weedy) plant species. The property is heavily disturbed as a result of previous agricultural uses, routine discing, illegal dumping, domestic pet (dog) use, and abutting development (see Figure 2 - Project Vicinity). The Project Site is currently zoned R-E, Residential Estate District (14,000-square-foot minimum lots) with a General Plan designation of Very Low Density Residential. The Proposed Project is an allowable use within the R-E zoning district, and is therefore consistent with the City of Redlands General Plan.

The residential lots would range from 7,842 square-feet (SF) SF to 12,683 SF. Lettered Lot A in the northwest corner of the TTM is proposed to be utilized as a detention basin. Lettered Lot B in the southwest corner is proposed as a paseo providing pedestrian access from internal streets to Capri Avenue. Lot C is proposed as a 73,455-SF park at the center of the Project Site. Landscape and pedestrian/bicycle trails around the perimeters are shown on Figure 3 as lettered lots D and E. The remaining lettered lots are proposed landscape areas around street blocks.

Access to the Project Site would be provided by two proposed 44-foot-wide entry streets, “A Street” from Capri Avenue and “B Street,” from San Bernardino Avenue; each would include a raised median for ingress/egress. All proposed internal streets would include 12-foot rights of way consisting of a 7-foot landscaped area curb adjacent and a 5-foot sidewalk from the back of the 7-foot landscaped area to the right of way line on each side of the internal streets.

9. **Surrounding Land Uses and Setting:** The Project Site is located in a developed area of the city with residential, recreational, and industrial uses. It is surrounded by residences to the east, south and west. The Redlands Sports Park and vacant land are to the north on the opposite side of San Bernardino Avenue. Adjacent property uses and land use designations are shown below in Table 1.

Table 1			
Existing Land Use and General Plan Designation			
Location	Existing Land Use	General Plan Designation	Zoning
Project Site	Vacant & Undeveloped	Very Low Density Residential	Residential Estate (14,000 SF minimum lots) (R-E)
North	Public Park - Soccer Field	Parks/Golf Courses	Open Land District (O)
South	Citrus trees Single-family residences	Agriculture; Very Low Density Residential	Residential Estate (14,000 SF minimum lots) (R-E)

East (Redlands sphere of influence)	Single-Family Residences, Vacant Land	Low Medium Density Residential	Single Residential (RS)
West	Single-Family Residences, Vacant Land	Agriculture	Agricultural (5-acre minimum lots) (A-1)



REGIONAL LOCATION

Citrus Estates TTM No. 20473

City of Redlands, California

FIGURE 1

Source: Lilburn Corp., April, 2022.

LILBURN
CORPORATION



PROJECT SITE

San Bernardino Ave.

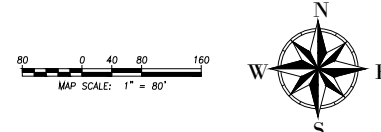
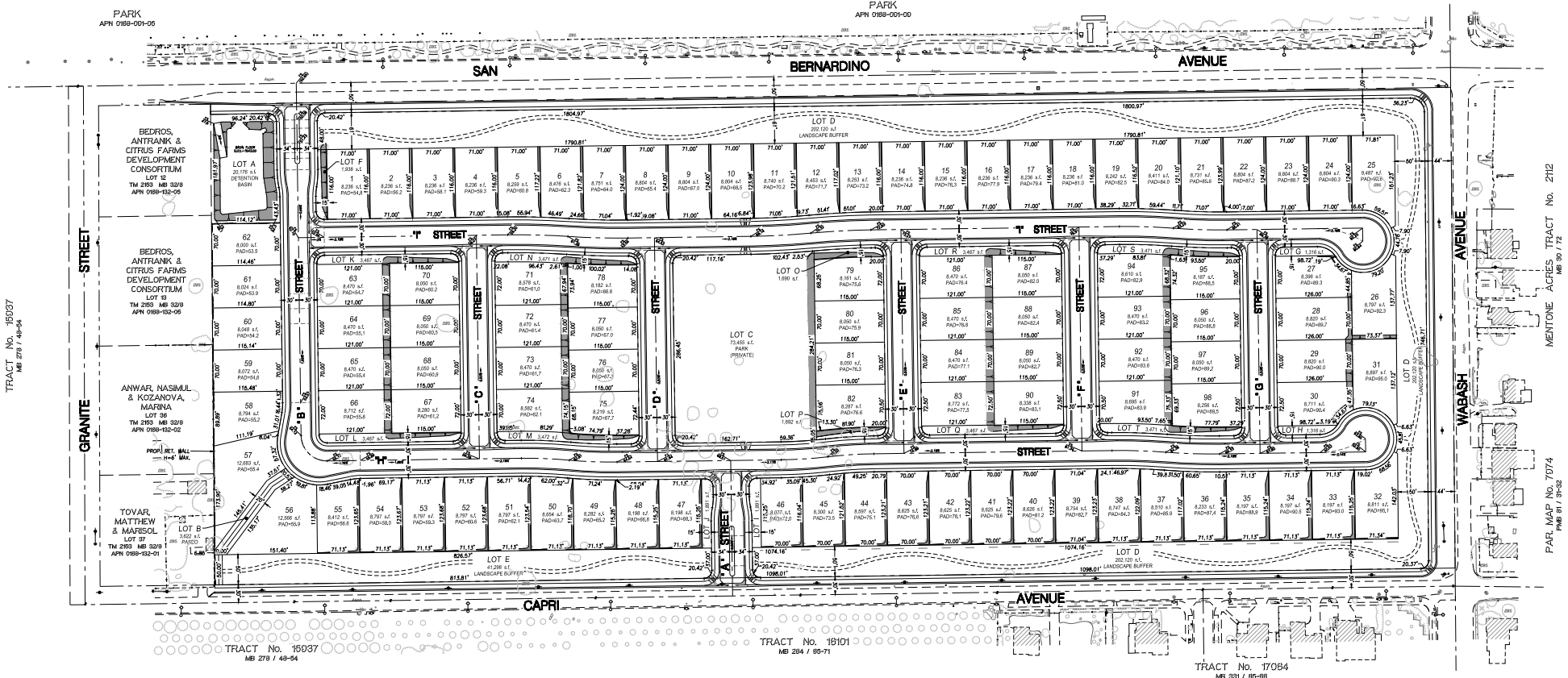
Wabash Ave.

San Bernardino Ave.

Granite St.

Capri Ave.

Wabash Ave.



Dan Guerra & Associates
 CIVIL ENGINEERS • LAND SURVEYORS
 10271-S TRACEMARK STREET
 PACHO OCEANOGRAPHY, CA 97670
 PH (503) 957-0200 FAX (503) 941-1282
 info@danaguerra.com

IN THE CITY OF REDLANDS TENTATIVE TRACT MAP PulteGROUP - CITRUS ESTATES - TTM No. 20473

Sheet 2 of 2

SITE PLAN

Citrus Estates TTM No. 20473
 City of Redlands, California

FIGURE 3

- 10. Other public agencies whose approval is required:**
Regional Water Quality Control Board, Santa Ana Region (SWPPP)
- 11. Related Technical Reports (incorporated by reference):** The technical studies/reports referenced herein and listed in the References section at the end of this Initial Study have been used to analyze the project. All reports are available for review at City of Redlands Development Services Department.
- 12. Evaluation Format:** This Initial Study is prepared in compliance with the California Environmental Quality Act (CEQA) Guidelines. This format of the study is presented as follows. The project is evaluated based upon its effect on twenty-one (21) major categories of environmental factors. Each factor is reviewed by responding to a series of questions regarding the impact of the project on each element of the overall factor. The Initial Study Checklist provides a formatted analysis that provides a determination of the effect of the project on the factor and its elements. The effect of the project is categorized into one of the following four categories of possible determinations:

Potentially Significant
Impact

Less than Significant
with Mitigation

Less than Significant

No Impact

Substantiation is then provided to justify each determination. One of the four following conclusions is then provided as a summary of the analysis for each of the major environmental factors.

1. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
2. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.
3. Possible significant adverse impacts have been identified or anticipated and the following mitigation measures are required as a condition of project approval to reduce these impacts to a level below significant. The required mitigation measures are: (List mitigation measures).
4. Significant adverse impacts have been identified or anticipated. An Environmental Impact Report (EIR) is required to evaluate these impacts, which are: (List the impacts requiring analysis within the EIR).

At the end of the analysis the required mitigation measures are restated and categorized as being either self- monitoring or as requiring a Mitigation Monitoring and Reporting Program.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

ENVIRONMENTAL DETERMINATION

On the basis of this Initial Study, the City of Perris Environmental Review Committee finds:

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

Signature Jocelyn Torres

Printed Name Jocelyn Torres

Date 7-28-2022

For _____

ENVIRONMENTAL CHECKLIST FORM

I. AESTHETICS – Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
a) Less Than Significant. Scenic vistas in the General Plan Planning Area of the City consist of the scenic corridors and views to and from the open spaces, canyonlands, hillsides, groves, and the San Bernardino Mountains.¹ There are citrus groves to the south and northeast of the Project Site that primarily serve as buffers for the developments on those properties. There are minimal views of these groves from San Bernardino and Wabash avenues. The Project Site is located in an area with views of the San Bernardino mountains and nearby hills. The Project Site is surrounded by single-family residences and a vacant lot to the east; single-family residences and a citrus grove to the south; one single-family residence and vacant land to the west; and a park and vacant land to the north. None of the views of the San Bernardino Mountains from these properties would be hindered by the Proposed Project due to the size of the structures (maximum two-story, or 35 feet) compared to the distance from and the height of the mountains. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.				
b) No Impact. Where vegetation is present on the vacant Project Site, it is dominated by ruderal (weedy) plant species. The property is heavily disturbed as a result of previous agricultural uses, routine disking, illegal dumping, domestic animal use, and abutting developments.² No scenic resources are located at the Project Site. The nearest State Scenic highway is State Route 38,³ located approximately 0.3 mile south of the Project Site. There				

¹ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.

² HELIX Environmental Planning, Inc. Biological Technical Report. October 2021.

³ San Bernardino County. Policy Plan web maps. NR-3 “Scenic Routes & Highways.” Accessed March 29, 2022.

is an existing residential tract between the Project Site and State Route 38. Therefore, implementation of the Proposed Project would not substantially degrade scenic resources within a state scenic highway. No impacts are identified or anticipated, and no mitigation measures are required.

- c) **Less than Significant.** The Project Site is currently vacant, and therefore, the Proposed Project would change the existing visual character of the site. The general area of the Project Site consists of a mix of vacant land and residential development. The Project Site is surrounded by single-family residences to the east, south, and west. The Proposed Project is a planned residential development with 98 lots and would therefore be compatible with the surrounding, existing development. Furthermore, it would include recreational open space and landscaping. The proposed change in the visual character of the site would not be degrading. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.
- d) **Less than Significant.** Although the Project Site is currently vacant, the development of 98 single-family would not generate a significant amount of light and glare when compared to the surrounding area, which include existing lighting from streetlights and vehicle headlights, residential homes, and the Redlands Sports Park. The Redlands Sports Park is a major contributor of light and glare to adjacent land uses during events held after dark. The design and placement of light fixtures within the future development would be reviewed for consistency with City standards and subject to City approval. City Standards require shielding, diffusing, or indirect lighting to avoid glare. Lighting would be selected and located to confine the area of illumination to the streets. Since lighting would be consistent with adjacent residential development to the south, east and west, the Proposed Project would not generate a new source of substantial light or glare. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

II. AGRICULTURE AND FORESTRY RESOURCES

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

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as	☐	☐	☐	☒

shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? ☐ ☐ ☐ ☒
- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 (g))? ☐ ☐ ☐ ☒
- d) Result in loss of forest land or conversion of forest land to non-forest use? ☐ ☐ ☐ ☒
- e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use? ☐ ☐ ☐ ☒
- a) **No Impact.** The Project Site is not identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. However, the Project Site is identified as “Grazing Land.”⁴ Appendix G of the CEQA Guidelines identifies the California Agricultural Land Evaluation and Site Assessment (LESA) Model as an optional method for assessing impacts to agriculture and farmland associated with development projects.

The LESA was prepared in accordance with the California Department of Conservation Office of Land Conservation (1997). LESA is a term used to define an approach for rating the relative quality of land resources based upon specific measurable features. The LESA system is a point-based approach composed of six factors. Two Land Evaluation (LE) factors are based upon soil resource quality. Four Site Assessment (SA) factors rate the value of the land for agricultural purposes based on the size of the site, water resource availability, surrounding agricultural lands and surrounding protected resource lands. Each factor is separately rated on a 100-point scale and then weighted relative to one another and combined, resulting in a single numeric score with a maximum attainable score of 100 points. It is this project score that becomes the basis for a determination of a project’s potential significance, based upon a range of established scoring thresholds⁵.

⁴ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.2-1: Farmland Classifications.

⁵ California Department of Conservation, Land Evaluation and Site Assessment Model, 1997

The site was evaluated using the California LESA Model to identify whether the Proposed Project would meet the threshold criteria as a significant impact to Agricultural Resources under the CEQA Guidelines. The factors used to perform the LESA evaluation are described as follows:

The Land Evaluation (LE) portion of the LESA Model focuses on two main components that are separately rated:

1. **Land Capability Classification Rating:** The Land Capability Classification (LCC) indicates the suitability of soils for most kinds of crops. Soils are rated from Class I to Class VIII. Soils having the fewest limitations receive the highest rating.
2. **Storie Index Rating:** The Storie Index provides a numeric rating (based upon a 100-point scale) of the relative degree of suitability or value of a given soil for intensive agriculture use. This rating is based upon soil characteristics only.

There are a total of three different soil types within the approximate 38-acre Project Site. Descriptions for each of the soils is presented herein.

According to the United States Department of Agriculture (USDA) survey, Tujunga gravelly loamy sand (TvC) is one of the main soil types occurring on approximately 22.5 acres of the 38-acre site. This soil is a Capability Class IVs-4 soil with a Storie Index rating of 34. According to the NRCS, Class IV soils have severe limitation that make them generally unsuited to cultivation and restrict their use largely to pasture or range, woodland or wildlife habitat. The subclass "s" shows that the soil is limited mainly because it is shallow. Capability units in California are given Arabic numbers that suggest the chief kind of limitations responsible for placement of the soils in the capability class and subclass. In this case, subclass 4 marks a problem or limitation caused by coarse soil texture or excessive gravel.

Tujunga loamy sand (TuB) occurs on approximately 9.5 acres of the 38-acre site. This soil is a Capability Class IIIe-4 and a storie index of 70. Class III soils have severe limitations which minimizes the selection of plants, requires special conservation practices, or both. Subclass "e" notes that shows that the main limitation is risk of erosion close-growing plant cover is maintained. The Arabic number 4 as previously described, is a limitation caused by coarse soil texture or excessive gravel.

A 6-acre portion of the 38-acre Project Site contains Soboba gravelly loamy sand (SoC), which has a Capability Class VIIs-1 and a Storie Index rating of 29. According to the NRCS, Class VI soils have severe limitations that make them generally unsuited to cultivation and limit their use largely to pasture or range, woodland or wildlife habitat. Subclass "s" notes that the soil is limited mainly because it is shallow, droughty, or stony. The Arabic number 1 indicates an actual or potential erosion hazard.

The LESA Model assigns ratings to each land capability class and multiplies that number by the proportion of the project area that contains each soil class to find the Land Capability

Classification score. A Storie Index score is calculated by multiplying the proportion of the project within each soil type by the soil type's Storie Index rating. Table 2 provides a summary of the Land Evaluation (LE) scores. In this case, Class IVs soils have a LCC Rating of 40, Class IIIe soils have an LCC rating of 70 and Class VIIs have a LCC rating of 20. Since the Project Site is composed of three different capability classes and three different corresponding Storie Indexes, the sum of these provides a total score that reflects the portion and occurrence of the soil map units on the Project Site.

Table 2
Land Capability Classification (LCC) and Storie Index Score

A	B	C	D	E	F	G	H
Soil Map Unit	Acres	Proportion of Project Area	LCC	LCC Rating	LCC Score	Storie Index	Storie Score
TvC	22.5	0.59	IVs-4	40	23.6	34	20.1
TuB	9.5	0.25	IIIe-4	70	17.5	70	17.5
SoC	6.0	0.16	VIIs-1	20	3.2	29	4.64
TOTALS	38	1.0		LCC Total Score	44.3	Storie Index Total Score	42.2

The California LESA Model includes the following four Site Assessment (SA) factors that are separately rated: 1) Project Size Rating; 2) Water Resources Availability Rating; 3) Surrounding Agricultural Land Rating; 4) Surrounding Protected Resource Land Rating.

Project Size Rating - The project size rating recognizes the role that farm size plays in the viability of commercial agricultural operations. To define agricultural productivity, the size of the farming operation is considered as well as the proportion of different quality lands comprising the total acreage. Lands with higher quality soils facilitate greater management and cropping flexibility and have the potential to provide higher economic return per acre unit than land with lower quality soils. Thus, rather than rely upon a single acreage figure in the Project Size rating, the project is divided into three acreage groupings based upon possible LCC ratings. The 38-acre site has Class III, Class IV and Class VI soils with a corresponding Project Size score of 0. The score reflects that there is not enough of a particular soil on-site of particular consequence as shown in Table 3.

Table 3
Project Size Score

	LCC CLASS I-II	LCC CLASS III	LCC CLASS IV-VIII
Total Acres	0	9.5	28.5
Project Size Scores	0	0	0

Water Resources Available Rating - The Water Resource Availability Rating is based upon the availability of water sources that supply the Project Site and then determining whether restrictions in supply are likely to take place in years characterized as periods of drought and non-drought. The 38-acre site occurs adjacent to existing City of Redlands water lines that would be used to serve the Project Site. The Project Site has no known physical or economic restrictions that could alter water supply and therefore is assigned a rating of 100.

Surrounding Agricultural Land Rating, Surrounding Protected Resource Land Rating, and Project Zone of Influence – The Project Site is surrounded by development. Except for citrus trees that occur as buffers on nearby residential develop, no significant amount of agriculture occurs within ¼ mile (i.e., Zone of Influence) of the Project Site. Similarly, no protected resource lands (e.g., Williamson Act Contracts) occur within ¼-mile of the site. Thus, the Surrounding Agricultural Land Rating, Surrounding Protected Resources Land Rating, and the Project Zone of Influence Rating factors receive a score of zero, as demonstrated in Table 4.

Conclusion - The LESA Model is weighted so that one-half of the total score is derived from the LE and one-half from the SA. As shown in Table 4, the LE sub-score is 21.7, and the SA sub-score is 15. The final LESA score is 36.7. As discussed in Section IV of the LESA Instruction Manual, a final LESA score between 0 and 39 points is not considered significant. Therefore, no impact would result, and no mitigation measures are warranted.

Table 4
Final LESA Score Sheet Summary

	Factor Rating (0-100 Points)	Factor Weighting (Total = 1.00)	Weighted Factor Rating
Land Evaluation (LE)			
1. Land Capability Classification (LCC Rating)	44.3	0.25	11.1
2. Storie Index Rating	42.2	0.25	10.6
LE Sub-score			21.7
Site Assessment (SA)			
1. Project Size Rating	0	0.15	0
2. Water Resource Availability Rating	100	0.15	15
3. Surrounding Agricultural Land Rating	0	0.15	0
4. Surrounding Protected Resource Lands Rating	0	0.05	0
SA Sub-score			15
TOTAL			36.7

- b) **No Impact.** The Project Site is currently zoned Residential Estate, (14,000 sq. ft. minimum lots) (R-E). It is not zoned for agricultural zone. In addition, the Project Site is not enrolled in a Williamson Act contract.⁶ Implementation of the Proposed Project would not interfere with such a contract. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- c) **No Impact.** The Project Site has a land use designation of Very Low Density Residential and is currently zoned R-E. The Proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g), timberland. The Project Site does not contain forestland. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- d) **No impact.** The Project Site does not support, nor is it near any forest land. Therefore, implementation of the Proposed Project would not convert forest land to non-forest use. No impacts are identified or anticipated, and no mitigation measures are required.
- e) **No Impact.** The Project Site does not support agricultural or forest land uses that would be lost as a result of the Proposed Project implementation. There are no such land uses in the vicinity. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

III. AIR QUALITY

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

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

⁶ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.2-1: Farmland Classifications.

- a) **Less than Significant.** The Project Site is located in the South Coast Air Basin (SCAB). The South Coast Air Quality Management District (SCAQMD) has jurisdiction over air quality issues and regulations within the SCAB. The Air Quality Management Plan (AQMP) for the SCAB establishes a program of rules and regulations administered by the SCAQMD to obtain attainment of the state and federal ambient air quality standards. The most recent AQMP (AQMP 2016) was adopted by the SCAQMD on March 3, 2017. The 2016 AQMP incorporates the latest scientific and technological information and planning assumptions, including transportation control measures developed by the Southern California Association of Governments (SCAG) from the 2016 Regional Transportation Plan/Sustainable Communities Strategy, and updated emission inventory methodologies for various source categories. Consistency with the AQMP 2016 for general development projects is determined by demonstrating compliance with local land use plans and/or employment projections.

The Project Site is located within the City General Plan Planning area. The Proposed Project does not include a General Plan Amendment nor a Zone Change and is therefore, consistent with the AQMP. The emissions associated with the Proposed Project would not result in a conflict or obstruction to the implementation of the AQMP. Therefore, project emissions are within those accounted for in the AQMP and no significant inconsistency with the AQMP would occur. The impact would be less than significant, and no mitigation measures are required.

- b) **Less than Significant.** The California Emissions Estimator Model (CalEEMod) recommended by the SCAQMD for all general development projects within the South Coast Air Basin. Therefore, the Proposed Project's construction and operational emissions were estimated using CalEEMod version 2020.4.0 (Appendix A). The criteria pollutants estimated for include: reactive organic gases (ROG), nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), and fugitive particulates (PM₁₀ and PM_{2.5}). Two of the analyzed pollutants, ROG and NO_x, are ozone precursors. Both summer and winter season emission levels were estimated.

Construction Emissions

Construction emissions are considered short-term, temporary emissions and were modeled with the following construction parameters: demolition, site preparation, site grading (fine and mass grading), building construction, paving, and architectural coating. Construction is anticipated to begin in the beginning of 2023 and be completed towards the end of 2026. The resulting emissions generated by construction of the Proposed Project are shown in Table 5 and Table 6, which represent summer and winter construction emissions, respectively.

Table 5
Summer Construction Emissions
(Pounds per Day)

Source/Phase	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Demolition	2.3	21.5	20.2	0.0	1.2	1.0
Site Preparation	2.8	32.1	20.3	0.1	11.1	6.0
Grading	3.4	34.6	28.8	0.1	5.8	3.0
Building Construction	2.7	18.4	27.5	0.1	4.3	1.6
Paving	1.1	8.6	15.0	0.0	0.6	0.4
Architectural Coating	23.1	1.2	3.4	0.0	0.6	0.2
Highest Value (lbs/day)	23.1	34.6	28.8	0.1	11.1	6.0
SCAQMD Threshold	75	100	550	150	150	55
Significant	No	No	No	No	No	No

Source: CalEEMod.2020.4.0 Summer Emissions.

Phases do not overlap and represent the highest concentration.

Table 6
Winter Construction Emissions
(Pounds per Day)

Source/Phase	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Demolition	2.3	21.5	20.1	0.0	1.2	1.0
Site Preparation	2.8	32.4	20.2	0.1	11.1	6.0
Grading	3.4	34.6	28.7	0.1	5.8	3.0
Building Construction	2.7	18.7	25.8	0.1	4.3	1.6
Paving	1.1	8.6	15.0	0.0	0.6	0.4
Architectural Coating	23.1	1.2	3.1	0.0	0.6	0.2
Highest Value (lbs/day)	23.1	34.6	28.7	0.1	11.1	6.0
SCAQMD Threshold	75	100	550	150	150	55
Significant	No	No	No	No	No	No

Source: CalEEMod.2020.4.0 Winter Emissions.

Phases do not overlap and represent the highest concentration.

As shown in Table 5 and Table 6, construction emissions during either summer or winter seasonal conditions would not exceed the SCAQMD thresholds. Although the Proposed Project does not exceed SCAQMD thresholds for construction emissions, the Project Proponent would be required to comply with all applicable SCAQMD rules and regulations as the SCAB is in non-attainment status for ozone and suspended particulates (PM₁₀ and PM_{2.5}).

Operational Emissions

The operational mobile emissions were calculated using CalEEMod with the vehicle trip generation estimates from the Traffic Impact Analysis (TIA), dated October 26, 2021, prepared for the Proposed Project by Michael Baker International. The TIA determined that the Proposed Project would generate approximately 1,021 total trips with a trip generation rate of 10.42 trips per dwelling unit per day. The CalEEMod default trip lengths

were used in this analysis. The summer and winter ROG, NO_x, CO, SO₂, PM₁₀, and PM_{2.5} emissions created from the Proposed Project's long-term operations have been calculated and are summarized below in Table 7 and Table 8.

Table 7
Summer Operational Emissions Summary
(Pounds per Day)

Source	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Area	4.3	0.1	8.1	0.0	0.0	0.0
Energy	0.1	0.7	0.3	0.0	0.1	0.1
Mobile	3.1	3.9	29.7	0.1	6.7	1.8
Totals	7.4	4.7	38.1	0.1	6.8	1.9
SCAQMD Threshold	55	55	550	150	150	55
Significant	No	No	No	No	No	No

Source: CalEEMod.2020.4.0 Summer Emissions.

Table 8
Winter Operational Emissions Summary
(Pounds per Day)

Source	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Area	4.3	0.1	8.1	0.0	0.0	0.0
Energy	0.1	0.7	0.3	0.0	0.1	0.1
Mobile	2.7	4.1	26.6	0.1	6.7	1.8
Totals	7.0	4.9	35.0	0.1	6.8	1.9
SCAQMD Threshold	55	55	550	150	150	55
Significant	No	No	No	No	No	No

Source: CalEEMod.2020.4.0 Winter Emissions.

As shown, both summer and winter season operational emissions are below SCAQMD thresholds. The Proposed Project does not exceed applicable SCAQMD regional thresholds either during construction or operational activities. The Proposed Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

- c) **Less than Significant.** For the purposes of a CEQA analysis, the SCAQMD considers a sensitive receptor to be a residence, hospital, convalescent facility or anywhere that it is possible for an individual to remain for 24 hours. Additionally, schools, playgrounds, childcare centers, and athletic facilities can also be considered as sensitive receptors. The use of Local Significance Threshold (LSTs) methodology is voluntary, to be implemented at the discretion of local public agencies acting as a lead agency pursuant to CEQA. According to SCAQMD LST methodology, LSTs would apply if the Proposed Project includes stationary sources or attracts mobile sources (such as heavy-duty trucks) that may spend long periods queuing and idling at the site; such as industrial warehouse/transfer facilities. The Proposed Project is the development of a single-family residential tract.

Therefore, no long-term localized significant threshold analysis is warranted. No significant impacts are identified or anticipated, and no mitigation measures are required.

- d) **Less than Significant.** The Proposed Project is a planned residential development and does not contain land uses typically associated with the emission of objectionable odors. Potential temporary odor sources associated with the Proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities. The Proposed Project would be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. SCAQMD Rule 402 regarding nuisances states: "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property." During operations, project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City of Redlands's solid waste regulations. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a) Have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
migratory wildlife corridors, or impede the use of native wildlife nursery sites?				
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan?	☐	☐	☐	☒

- a) **Less than Significant with Mitigation.** A Biological Technical Report was prepared in October 2021 for the Proposed Project by HELIX Environmental Planning, Inc. (HELIX) and is summarized herein (see Appendix B for report). The purpose of the report was to document the existing biological conditions within the Project Site and analyze the Proposed Project's potential impacts to sensitive biological resources with respect to local, state, and federal policy.

The Proposed Project was found to have no impact on special status plant species. No special status plant species or suitable conditions for such species were observed within the Project Site. The property is characterized predominately by ruderal (weedy) vegetation and disturbances related to previous agricultural uses, routine discing, and others.

While U.S. Fish and Wildlife Service (USFWS) critical habitat for the San Bernardino kangaroo rat occurs along the Santa Ana River approximately 0.25 mile north of the Project Site, the site lacks the species' critical habitat Primary Constituent Elements (PCE) and any suitable habitat for the species. No suitable habitat or areas supporting the species' critical habitat PCE's occur immediately adjacent to the Project Site. Existing barriers occur between the Project Site and suitable habitat associated with the Santa Ana River corridor that preclude the species from readily moving onto the Project Site. In conclusion, San Bernardino kangaroo rat is not expected to occur and the Proposed Project would have no impacts on the species.

The Proposed Project could result in significant direct and/or indirect impacts on bird species with the potential to nest on-site. The project would require the removal of non-sensitive vegetation and other potential nesting habitat for common birds and raptors protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game (CFG) Code. This includes the burrowing owl, which is not expected to occur based on current conditions, but could move onto the site if conditions become suitable for the species in the future. If unmitigated, impacts on active nests belonging to bird species protected under the MBTA and CFG Code, including burrowing owl, would be significant. Mitigation measures BIO-1 and BIO-2 would ensure that the appropriate pre-construction survey and avoidance measures are implemented prior to and during construction to avoid any impacts on nesting birds and raptors, including the burrowing owl. With the

implementation of mitigation measures BIO-1 and BIO-2, less than significant impacts would occur.

BIO-1: Nesting Bird and Raptor Avoidance - Trimming, grubbing, and clearing of vegetation shall be avoided during the general avian breeding season (January 15 to July 15 for raptors; February 15 to August 31 for other avian species) to the extent feasible. If trimming, grubbing, or clearing of vegetation is proposed to occur during the general avian breeding season, a pre-construction survey shall be conducted by a qualified biologist no more than seven days prior to vegetation clearing to determine if active bird nests are present in the affected areas. If there are no nesting birds (includes nest building or other breeding/nesting behavior) within this area, trimming, grubbing, and clearing of vegetation shall be allowed to proceed. If active bird nests are confirmed to be present during the pre-construction survey, a buffer zone will be established by the biologist. Construction activities shall avoid any active nests until a qualified biologist has verified that the young have fledged, or the nest has otherwise become inactive.

BIO-2: Burrowing Owl Pre-Construction Take Avoidance Survey - Prior to construction, the project proponent shall retain a qualified biologist to conduct required pre-construction take avoidance surveys for the burrowing owl in accordance with the protocol described in the California Department of Fish and Wildlife (CDFW) Staff Report on Burrowing Owl Mitigation (CDFW 2012). The initial take avoidance survey shall occur no less than 14 days prior to initiating ground disturbing activities, with a final survey conducted within 24 hours prior to initiating ground disturbing activities. If, after the initial take avoidance survey, no suitable burrowing owl habitat, including burrows, is present, then the second survey 24 hours prior to ground disturbance shall not be required. If no active burrowing owl burrows (nesting sites) are identified within the potential impact area of the project during the take avoidance surveys, then no additional action shall be required. If active burrowing owl burrows are identified within the potential impact area, then no impacts shall occur to active burrowing owl nests or individuals and the following additional avoidance actions shall be required:

The project shall avoid disturbing active burrowing owl burrows (nesting sites) and burrowing owl individuals. Buffers shall be established around occupied burrows in accordance with guidance provided in the CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012) based on the proposed level of disturbance. For low disturbance projects, initial setback distances for avoidance of active burrows shall be 200 meters from April 1 to October 15 and 50 meters from October 16 to March 31. Exceptions can be made to the avoidance distance for areas with natural (hills, trees) or artificial (buildings, walls) barriers in place. The final avoidance buffer shall be at the discretion of the biologist. If, after consideration of a reduced buffer, an adequate avoidance buffer cannot be provided between an occupied burrow and required ground disturbing activities, then passive relocation activities during the non-breeding season (September 1 through January 31) may be authorized in consultation with CDFW, which would include preparation, approval, and implementation of a Burrowing Owl Exclusion Plan in accordance with protocol described in the CDFW Staff Report on Burrowing Owl Mitigation.

Project implementation could result in significant impacts to nesting birds and raptors, including burrowing owl. Implementation of Mitigation Measures BIO-1 and BIO-2 would ensure that potential impacts are less than significant.

- b) **No Impact.** There is one plant alliance, association, or semi-natural stand present within the Project Site. Within the Project Site, disturbed habitat consists of disced bare ground with scattered annual nonnative species, primarily non-native grasses such as ripgut (*Bromus diandrus*) and wild oat (*Avena fatua*), and ruderal (weedy) species such as short-pod mustard (*Hirschfeldia incana*), telegraph weed (*Heterotheca grandiflora*), and rancher's fiddleneck (*Amsinckia menziesii*). Disturbed habitat covers approximately all 38.0 acres of the Project Site and consists of dirt paths and undeveloped land adjacent to roadsides.

Sensitive vegetation communities/habitat types are defined as land that supports unique vegetation communities or the habitats of rare or endangered species or subspecies of animals or plants. The Proposed Project would result in impacts to disced land comprised of disturbed ruderal (weedy) habitat, which is not considered a sensitive natural community. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

- c) **No Impact.** Jurisdictional waters and wetlands include waters of the U.S., including wetlands regulated by the U.S. Army Corps of Engineers (USACE) pursuant to the Clean Water Act (CWA) Section 404; waters of the State regulated by the Regional Water Quality Control Board (RWQCB) pursuant to Section 401 of the CWA and State Porter-Cologne Water Quality Control Act; and/or streambed and riparian habitat regulated by the CDFW pursuant to Sections 1600 et seq. of the CFG Code.

Helix determined that potential waters of the U.S., waters of the State, and CDFW jurisdictional habitat are not present within the Project Site. The property is comprised entirely of flat uplands that lack drainage features, ditches, depressions, riparian habitat, potential wetlands, and other aquatic resources. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

- d) **Less than Significant.** Wildlife movement and the fragmentation of wildlife habitat are recognized as critical issues that must be considered in assessing impacts to wildlife. Habitat fragmentation is the division or breaking up of larger habitat areas into smaller areas that may or may not be capable of independently sustaining wildlife and plant populations. Habitat linkages provide connections between larger habitat areas that are separated by development. Wildlife corridors are similar to linkages but provide specific opportunities for animals to disperse or migrate between areas.

The Project Site is not located within any linkages recognized by the South Coast Missing Linkages report (South Coast Wildlands 2008). The property does not by itself function as nor does it contribute to any local or regional wildlife corridors or linkages. It is also not contained within or connected to any local or regional core resource areas. The Project Site and project features occur within disturbed areas that are separated from other open areas

by transportation corridors and development. The Santa Ana River corridor is located approximately 0.7 mile north of the Project Site, and functions to facilitate regional wildlife movement. The Santa Ana River corridor is not connected to the Project Site due to development that occurs north of the site, separating it from the Santa Ana River corridor. No significant impacts are identified or anticipated, and no mitigation measures are required.

- e) **Less than Significant.** If standard design features and construction practices are not implemented, the project could conflict with local policies and ordinances pertaining to biological resources. The City of Redlands General Plan 2035 requires that new development take actions to protect biological resources. The Project Site is characterized by low-quality disturbed land that generally lacks biological resources of value. The Proposed Project could, however, impact nesting birds, including burrowing owl, if standard pre-construction survey and avoidance measures are not implemented prior to construction. Mitigation measures BIO-1 and BIO-2 would ensure that the appropriate pre-construction survey and avoidance measures are implemented prior to and during construction to avoid any impacts on nesting birds and raptors, including the burrowing owl. For trees located on-site that are to be removed, the Applicant shall comply with the City of Redlands Landmark Tree protection criteria established in Sections 12.52.20 and 12.52.30 of the Redlands Municipal Code.
- f) **No Impact.** The Project Site is not located within the boundaries of any adopted conservation plan. Therefore, no impact on any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan would occur. No impacts are identified or anticipated, and no mitigation measures are required.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐
a) Less than Significant with Mitigation. A Cultural Resources Study, dated September 29, 2021 and revised May 19, 2022, was prepared for the Project Site by Brian F. Smith and Associates, Inc. (see Appendix C for report). Findings of the study are summarized herein.				

The purpose of the investigation was to locate and record any cultural resources present within the project and subsequently evaluate any resources as part of the City of Redlands' environmental review process conducted in compliance with the CEQA.

The aerial photographs reviewed indicate that the property was used agriculturally as an orchard from at least 1939 through 1995. It appears that the project area continued to be used agriculturally between 1995 and 2009 but for dry lot farming instead of as an orchard. In 2006, the northwestern corner of the project was graded, but no development was completed. After 2009, the property was left vacant.

Sources indicated that the Project Site is located within the 1876 Brink Homestead property and is associated with the early twentieth century orchard. None of the visible structures on the aerials and USGS maps are directly associated with the early twentieth century orchard within the property, and none of the past owners of the property ever lived within or adjacent to the Project Site. Sources reviewed indicate that the subject property retains a high level of probability for the presence of buried historic and prehistoric resources, including circa 1940's irrigation features. Further, a previous study of the property indicated the presence of historic-aged standpipes and associated artifacts (Dice and Vianna 2003). While the Dice and Vianna (2003) study did not recommend monitoring and did not formally record these features or artifacts associated with the historic citrus grove, the presence of these features and artifacts also indicate that the subject property retains the potential for buried cultural resources associated with the historic development of the property as it pertains to the citrus economy of the greater Redlands area, specifically Lugonia.

Given that the prior agricultural use (since 1876) and orchard removal (in 2009) within the project might have masked archaeological deposits, and based upon the association of the site with the Brink Ranch property, there is a potential that buried archaeological deposits are present within the project boundaries and therefore Mitigation Measures CR-1 through CR-5 shall be implemented.

CR-1: The archaeological monitor shall be present full-time during all soil-disturbing and grading/excavation/trenching activities that could result in impacts to archaeological resources. The principal investigator (PI) may submit a detailed letter to the lead agency during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating previous grading/trenching activities, presence of fossil formations, or native soils is encountered that may reduce or increase the potential for resources to be present.

CR-2: In the event of an archaeological discovery, either historic or prehistoric, the archaeological monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to, digging, trenching, excavating, or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources, and immediately notify the Native American monitor and client, as appropriate. The monitor shall immediately notify the PI (unless monitor is the PI) of the discovery.

CR-3: The PI shall evaluate the significance of the resource and shall immediately notify the City to discuss significance determination and shall also submit a letter indicating whether additional mitigation is required. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) that has also been reviewed by the Native American consultant/monitor, and obtain written approval from the City to implement that program. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume. If the resource is not significant, the PI shall submit a letter to the City indicating that artifacts will be collected, curated, and documented in the final monitoring report. The letter shall also indicate that no further work is required.

CR-4: The PI shall submit to the City a draft monitoring report (even if negative) prepared in accordance with the agency guidelines, which describes the results, analysis, and conclusions of all phases of the archaeological monitoring program (with appropriate graphics). For significant archaeological resources encountered during monitoring, the ADRP shall be included in the draft monitoring report. Recording sites with the State of California Department of Parks and Recreation (DPR) shall be the responsibility of the PI, including recording (on the appropriate forms-DPR 523 A/B) any significant or potentially significant resources encountered during the archaeological monitoring program. The PI shall submit a revised draft monitoring report to the City for approval, including any changes or clarifications requested by the City

CR-5: The PI shall be responsible for ensuring that all cultural remains collected are cleaned and cataloged. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.

With the implementation of Mitigation Measures CR-1 through CR-5, less than significant impacts would occur.

- b) **Less than Significant with Mitigation.** BFSA also requested a SLF search from the NAHC to search for the presence of sacred sites or locations of religious or ceremonial importance within the search radius. The NAHC results were positive for the presence of sacred sites or locations of religious or ceremonial importance within the search radius.

While BFSA's investigation did not indicate the presence of any additional visible archaeological resources within the project, the absence of positive results does not necessarily indicate the absence of resources. These sources do indicate that the subject property retains a high level of probability for the presence of buried historic and prehistoric resources, including irrigation features. Further, a previous study of the property indicated the presence of historic-aged standpipes and associated artifacts (Dice and Vianna 2003). While the Dice and Vianna (2003) study did not recommend monitoring and did not formally record these features or artifacts associated with the historic citrus grove, the presence of these features and artifacts also indicate that the subject property retains the potential for buried cultural resources associated with the historic development

of the property as it pertains to the citrus economy of the greater Redlands area, specifically Lugonia.

Given that the prior agricultural use (since 1876) and orchard removal (in 2009) within the project might have masked archaeological deposits, and based upon the association of the site with the Brink Ranch property, there is a potential that buried archaeological deposits are present within the project boundaries. Therefore, it is recommended that the Mitigation Measures CR-1 to CR-5 above be implemented. With the implementation of Mitigation Measures CR-1 through CR-52, less than significant impacts would occur.

- c) **Less than Significant with Mitigation.** The discovery of human remains is always a possibility during ground-disturbing activities. Therefore, possible significant adverse impacts have been identified or anticipated and mitigation measure CR-6 is required as a condition of project approval to reduce these impacts to a less than significant level.

CR-6: If human remains are discovered, work shall halt in that area until a determination can be made regarding the provenance of the human remains, and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98), and the State Health and Safety Code (Sec. 7050.5) shall be undertaken. All work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the medical examiner in consultation with the PI concerning the provenance of the remains. The medical examiner will determine, with input from the PI, if the remains are or are most likely to be of Native American origin. If human remains ARE determined to be Native American, the medical examiner will notify the NAHC within 24 hours. If human remains are not Native American, the medical examiner will determine the appropriate course of action with the PI and city staff (Public Resources Code 5097.98).

With the implementation of Mitigation Measures CR-6, less than significant impacts would occur.

VI. ENERGY

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

a) **Less than Significant.**

Electricity

Southern California Edison (SCE) provides electricity to the area of Project Site. Currently, the Project Site is vacant and undeveloped. Therefore, development of the Proposed Project would cause a permanent increase in demand for electricity when compared to existing conditions. The CalEEMod output estimates that the Proposed Project would consume 0.780 GWh annually. According to the California Energy Commission, the residential sector of the SCE planning area consumed 38,498.76 GWh of electricity in 2020.⁷ The increase in electricity demand from the project would represent a 0.002 percent of the overall 2020 SCE residential consumption. Therefore, projected electrical demand would not significantly impact SCE's level of service.

Natural Gas

The Project Site is located within the service area of Southern California Gas (SoCal Gas). The Project Site is currently vacant and has no demand for natural gas. The Proposed Project will create a permanent increase demand for natural gas. The Proposed Project's estimated annual natural gas demand is 27,721.2 therms. According to the California Energy Commission, the natural gas consumption of the SoCal Gas's residential sector was 2,474,195,977 therms in 2020.⁸ The Proposed Project's estimated annual natural gas consumption, using the output from CalEEMod, compared to the 2020 annual natural gas consumption of the overall residential sector in the SoCal Gas Planning Area would account for approximately 0.0011 percent of the total natural gas consumption. Therefore, projected natural gas demand would not significantly impact SoCal Gas's level of service.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

- b) **Less than Significant.** As concluded above, the Proposed Project's total impact on regional energy supplies would be minor. The Proposed Project would be required to comply with the California Building Code (CBC) and California Green Building Standards Code (CALGreen Code) pertaining to energy and water conservation standards in effect at the time of construction. The Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant and no mitigation is required.

⁷California Energy Commission. <https://ecdms.energy.ca.gov/Default.aspx>. Accessed February 15, 2022.

⁸California Energy Commission. <https://ecdms.energy.ca.gov/Default.aspx>. Accessed February 15, 2022.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 181-B of the California Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
a)				
i. Less Than Significant. A Report of Geotechnical Due Diligence Exploration, dated June 28, 2021, was prepared for the Proposed Project by Leighton and Associates, Inc. (Leighton) (see Appendix D for report). The due diligence included field exploration and the excavation of four test pits. A mapped trace associated with of the San Andreas fault zone is located approximately 2.8 miles northeast of the Project Site. The proposed development is not within an Earthquake Fault Zone as designated by the State of California or County of San Bernardino for active surface faulting. No known active faults have been mapped onsite nor are trending toward the Project Site. The nearest known active faults are San Andreas fault, located about 2.8 miles to the northwest, and San Jacinto fault, located about 6.6 miles to the southwest. As stated in the geotechnical report, the potential for surface rupture from active faulting is very low. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.				
ii. Less Than Significant. The site is anticipated to experience strong ground shaking during the life of the Proposed Project resulting from an earthquake occurring along one or more of the major active or potentially active faults in southern California. Accordingly, the project shall be designed in accordance with all applicable current codes and standards utilizing the appropriate seismic design parameters to reduce seismic risk as defined by California Geological Survey (CGS) Chapter 2 of Special Publication 117a (CGS, 2008). Through compliance with these regulatory requirements and the utilization of appropriate seismic design parameters selected by the design professionals, potential effects relating to seismic shaking can be reduced. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.				
iii. Less Than Significant. Liquefaction is a phenomenon in which cohesion-less, saturated, fine-grained sand and silt soils maps this site as outside any liquefaction or landslide hazard areas. The Project Site is located outside of any mapped liquefaction hazards. ⁹ The State of California has not prepared liquefaction hazard maps for this area. Based on the dense nature of the deposits found onsite, which include cobbles and boulders, and the lack of shallow groundwater encountered during exploration, Leighton concludes that the potential for liquefaction on-site is considered low. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are recommended.				

⁹San Bernardino County. County Policy Plan web maps: HZ-2 Liquefaction & Landslides.

<https://www.arcgis.com/apps/webappviewer/index.html?id=fcb9bc427d2a4c5a981f97547a0e368>

⁸Accessed May 4, 2022.

- iv. **No Impact.** The Project Site is not located within an area susceptible to landslides.¹⁰ The property and its immediate surroundings are relatively flat and level. Based on this, Leighton determined the potential for seismically induced landslides is considered negligible. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- b) **Less than Significant.** Construction activities could result in soil erosion if the Project Site is not properly designed. The Proposed Project would result in a net cut of 10,000 cubic yards of material. The potential impacts of soil erosion would be minimized through the preparation and implementation of a Storm Water Pollution and Prevention Plan (SWPPP). The SWPPP would prescribe temporary Best Management Practices (BMPs) to control wind and water erosion during and shortly after the construction of the Proposed Project. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.
- c) **Less than Significant.** Soil compressibility refers to a soil's potential for settlement when subjected to increased loads as from a fill surcharge. Based on Leighton's investigation, near-surface native soil encountered is generally considered slightly compressible. Partial removal and recompaction of this material under shallow foundations will help reduce the potential for adverse total and differential settlement of the proposed improvements. Collapse potential refers to the potential settlement of a soil under existing stresses upon being moistened. Generally, the presence of gravel in soil indicates a high energy fluvial environment, which had deposited sediment densely, and collapse potential is considered negligible.
- Alluvial deposits observed in Leighton's test pits consisted of silty sand, gravelly sand, cobbles with boulders up to 4 feet in their largest dimension, which indicated a relatively high stream power to reach the critical threshold for grain movement during transport. Because sediment was transported in a relatively high-energy flow environment, the stresses applied to the grains would have compacted them tightly together during deposition. Considering this depositional environment, the alluvial deposits on-site are expected to be very dense, and the potential for significant seismically induced settlement is considered very low. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.
- d) **Less than Significant.** Expansive soils (shrink-swell) are fine grained clay soils generally found in historical floodplains and lakes. Expansive soils are subject to swelling and shrinkage in relation to the amount of moisture present in the soil. Based on the high percentage of coarse-grained material, expansion potential is expected to be very low. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

¹⁰ San Bernardino County. County Policy Plan web maps: HZ-2 Liquefaction & Landslides.

<https://www.arcgis.com/apps/webappviewer/index.html?id=fcb9bc427d2a4c5a981f97547a0e368>

⁸ Accessed May 4, 2022.

- e) **No Impact.** The Proposed Project would connect to the City's existing sewer collection system which includes sewer lines adjacent to the Project Site within Granite Avenue and Capri Avenue.¹¹ No septic tanks or alternative wastewater disposal are proposed. No impacts are identified or are anticipated, and no mitigation measures are required.
- f) **Less Than Significant with Mitigation.** A Paleontological Assessment report, dated September 29, 2021, was prepared for the Project Site by Brian F. Smith and Associates, Inc. (see Appendix E for report). As summarized in the report, the existence of Holocene, very coarse young axial-valley deposits are mapped at the surface of the project. Based on the lack of known significant fossil localities nearby and a low sensitivity rating typically assigned to Holocene-aged cobbly and bouldery deposits for yielding paleontological resources, it is recommended that paleontological monitoring not be implemented during mass grading and excavation activities in order to mitigate any adverse impacts (loss or destruction) to potential nonrenewable paleontological resources. Monitoring for paleontological resources does not appear warranted at the project. However, should paleontological resources be discovered at any time during earth disturbance activities at the project, Mitigation Measure GEO-1 shall be implemented. Paleontological monitoring may be reduced or increased based upon the observations and recommendations of the professional-level project paleontologist.:

GEO-1: If paleontological resources (fossils) are discovered, earth disturbance activities should stop, and the fossil location shall be protected and cordoned off at a distance of 50 feet in all directions. A qualified paleontologist should be notified immediately to determine the significance of the discovery. After examination of the fossil(s), and if the paleontologist determines the fossil(s) to be significant, monitoring for paleontological resources is warranted. Monitoring of mass grading and excavation activities in areas identified as likely to contain paleontological resources shall be performed by the paleontological monitor. Monitoring will be conducted in areas of grading or excavation in undisturbed sediments. The duration of monitoring shall be determined by the qualified project paleontologist. Paleontological monitors will be equipped to salvage fossils as they are unearthed to avoid construction delays. The monitor will be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or, if present, are determined upon exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources. The monitor

¹¹ Michael Baker International City of Redlands - General Plan Housing Element. Figure 3-1 "RHNA Sites and Sewer Infrastructure."

shall notify the project paleontologist, who will then notify the concerned parties of the discovery.

Implementation of Mitigation Measure GEO-1 would reduce potentially significant impacts to paleontological resources to a level below significant.

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	☐	☐	☒	☐
b) Conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing the emissions of greenhouse gases.	☐	☐	☒	☐
a) Less than Significant. Emissions were estimated using CalEEMod version 2020.4.0 with construction anticipated to begin in the beginning of 2023 and be completed towards the end of 2026. The CalEEMod defaults were used for other parameters which are used to estimate construction emissions, such as the worker and vendor trips and trip lengths. The operational mobile emissions were calculated using CalEEMod with the vehicle trip generation estimates from the Traffic Impact Analysis (TIA), dated October 26, 2021, prepared for the Proposed Project by Michael Baker International. The TIA determined that the Proposed Project will generate approximately 1,021 total trips with a trip generation rate of 10.42 trips per dwelling unit per day.				

Many gases make up the group of pollutants which contribute to global climate change. However, three gases are currently evaluated and represent the highest concentration of GHG: Carbon dioxide (CO₂), Methane (CH₄), and Nitrous oxide (N₂O). The California Air Resources Board (CARB) recommends that local governments reduce their GHG emissions to 6 MTCO₂e per capita per year in 2030 and 2 MTCO₂e per capita per year in 2050. Projects that garner a GHG emissions targets of 6 MT CO₂e per capita per year would not require mitigation of project specific GHG emissions. On December 5, 2017, the City of Redlands adopted a Climate Action Plan (CAP), to focus on adaptive GHG measures that reduce emissions through standard practice measures and help prepare the City for the impacts of climate change. The Proposed Project's emissions were compared to SCAQMD draft screening threshold of 3,000 metric tons CO₂e and the CAP threshold of 6 MT CO₂e per capita per year. A summary of the results is shown below in Table 9 and Table 10.

Table 9
Greenhouse Gas Construction Emissions
(Metric Tons per Year)

Source/Phase	CO ₂	CH ₄	N ₂ O
Demolition	53.4	0.0	0.0
Site Preparation	87.2	0.0	0.0
Grading	210.9	0.1	0.0
Building Construction (2023)	259.5	0.0	0.0
Building Construction (2024)	809.9	0.1	0.0
Building Construction (2025)	795.6	0.1	0.0
Building Construction (2026)	402.9	0.0	0.0
Paving	58.3	0.0	0.0
Architectural Coating	18.4	0.0	0.0
Total (MTCO₂e)	2,774.9		
Construction Amortized 30 Years	92.5		

Source: CalEEMod.2020.4.0 Annual Emissions.

Table 10
Greenhouse Gas Operational Emissions
(Metric Tons per Year)

Source/Phase	CO ₂	CH ₄	N ₂ O
Area	1.7	0.0	0.0
Energy	275.3	0.0	0.0
Mobile	1,036.9	0.1	0.1
Waste	23.3	1.4	0.0
Water	19.3	0.2	0.0
Construction Amortized 30 Years	92.5		
Total (MTCO₂e)	1,507		
SCAQMD Threshold	3,000		
Project Population (number of residences)	260		
CO ₂ e per capita	5.8		
CAP Threshold	6.0		
Significant	No		

Source: CalEEMod.2020.4.0 Annual Emissions.

As shown in Table 8 and Table 9, the Proposed Project's emissions would not exceed SCAQMD's draft screening threshold and the CAP's threshold of significance. Less than significant impacts are identified or anticipated, and no mitigation measures are required.

- b) **Less than Significant.** The SCAQMD's thresholds used the California Governor Executive Order S-3-05 goals as the basis for deriving the screening level. The Proposed Project's emissions meet the threshold for compliance with Executive Order S-3-05. Additionally, as the Proposed Project meets the current interim emissions

targets/thresholds established by the SCAQMD (as described in Section III. Air Quality of this Initial Study), the Proposed Project would also be on track to meet the reduction target of 40 percent below 1990 levels by 2030 as mandated by SB 32. Furthermore, all of the post-2020 reductions in GHG emissions are addressed via regulatory requirements at the State level and the Proposed Project will be required to comply with these regulations as they come into effect. As discussed, the Proposed Project's GHG emissions fall below the Tier 3 SCAQMD draft screening threshold of 3,000 metric tons of CO₂ equivalent per year and the Proposed Project is in compliance with the reduction goals AB 32 and SB 32.

The CAP quantifies existing and projected GHG emissions in the General Plan Planning Area through horizon year 2035 resulting from activities within the Planning Area and the region, and it includes GHG emissions reduction targets for the year 2035. To reflect SB 32 target, CARB's 2017 Climate Change Scoping Plan Update recommends that local governments target 6 MTCO₂e per capita for 2030 emissions and 2 MTCO₂e per capita for 2050 emissions.¹² The Proposed Project's emissions would not exceed the CAP's threshold of 6 MTCO₂e per capita per year.

Therefore, construction and operation of the Proposed Project will not conflict with any applicable plan, local or regional greenhouse gas plans. No significant impacts are identified or anticipated, and no mitigation measures are required.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a) Create a significant hazard to the public or the Environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a	☐	☐	☒	☐

¹² Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
result, would it create a significant hazard to the public or the environment?				
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐
a, b) Less Than Significant. The Proposed Project is the subdivision of the Project Site into 98 residential lots and 20 lettered lots. It does not contain land uses typically associated with hazardous emissions or the handling hazardous or acutely hazardous materials, substances, or waste. Construction of the Proposed Project would require the routine transport, use, storage, and disposal of limited quantities of common hazardous materials such as gasoline, diesel fuel, oils, solvents, paint, fertilizers, pesticides, and other similar materials. All materials required during construction would be kept in compliance with State and local regulations and Best Management Practices. Operations would include standard maintenance (i.e., landscape upkeep, exterior painting and similar activities) involving the use of commercially available products (e.g., pesticides, herbicides, gas, oil, paint, etc.) the use of which would not create a significant hazard to the public. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.				
c) No Impact. The nearest schools to the Project Site are Redlands East Valley High School and Crafton Elementary both approximately one mile to the south of the Project Site; and Mentone Elementary approximately one mile to the east. No schools exist within a quarter-mile of the Project Site. Furthermore, the Proposed Project is a residential development, which does not contain land uses typically associated with the hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.				
d) Less Than Significant. The Project Site is not included on a list of hazardous material sites as compiled pursuant to Government Code Section 65962.5 and reported in the				

EnviroStor database.¹³ A Phase I Environmental Site Assessment (Phase I ESA), dated June 11, 2021, was prepared for the Proposed Project by Leighton and Associates, Inc. (see Appendix F for report). The assessment has revealed no evidence of recognized environmental conditions (RECs), historical RECs (HRECs), or controlled RECs (CRECs) associated with the Project Site. Therefore, no significant adverse impacts are identified or anticipated.

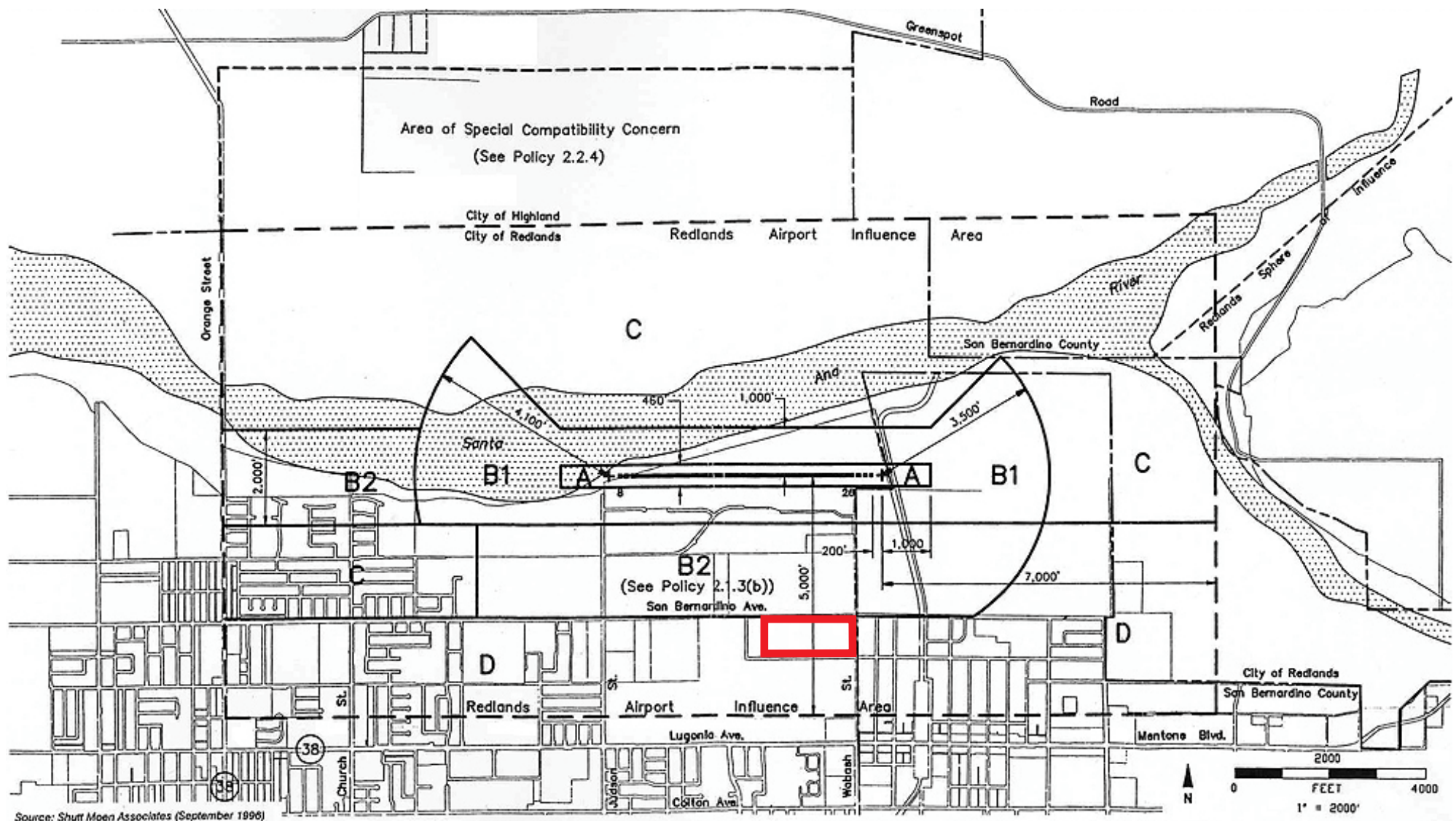
- e) **Less Than Significant.** The nearest airport to the Project Site is the Redlands Municipal Airport, which is located approximately 2,235 feet (or 0.4 mile) to the north of the Project Site (see Figure 4). The Project Site is located entirely within Compatibility Zone D in the Redlands Land Use Compatibility Plan. Zone D “includes other areas within the airport vicinity which are overflowed less frequently or at higher altitude by aircraft arriving and departing the airport” (Redlands ALUCP, pg. 2-8). The Proposed Project is an allowed use within Compatibility Zone D, there are no residential density limits, and there are no occupancy limits in terms of buildings or people per acre.¹⁴ The Proposed Project is a planned residential development, and would not change air traffic patterns or create a safety hazard to people on the ground or to aircraft overflight. In accordance with the Redlands ALCUP and the project Conditions of Approval, a deed notice shall be required notifying potential buyers and homeowners that an airport is in the vicinity and they can expect aircraft overflight and related effects such as noise. In addition, RMC Chapter 17.28 (Marketing and Disclosure Requirements for New Residential Subdivision Development Located Within the Redlands Airport Influence Area) is a standard requirement and obligates the developer or seller to notify potential buyers of the Redlands airport nearby prior to closing escrow. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.
- f) **Less than Significant.** The Project Site does not contain any emergency facilities.¹⁵ It is adjacent to San Bernardino Avenue, Capri Avenue, and Wabash Avenue, which are not evacuation routes.¹⁶ The Proposed Project would include local interior streets “C” through “I,” which would connect to San Bernardino Avenue (minor arterial) via the proposed “B Street” and connect to Capri Avenue (local road) via the proposed “A Street.” The California Emergency Services Act requires the City to manage and coordinate the overall emergency and recovery activities within its jurisdictional boundaries. The City’s Emergency Operations Plan includes policies and procedures to be administered by the City in the event of a disaster. During disasters, the City of Redlands is required to coordinate emergency operations with the County of San Bernardino. Policies within the City’s General Plan and updates to the City’s Emergency Plan, as required by State law, would ensure the Proposed Project would not interfere with adopted policies and procedures. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

¹³ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.7-1: Hazardous Material Site.

¹⁴ Shutt Moen Associates. Redlands Municipal Airport Land Use Compatibility Plan. Table 2A “Primary compatibility Criteria.”

¹⁵ San Bernardino County. Countywide Policy Plan web maps: PP-1 “Critical Facilities.” Accessed March 30, 2022.

¹⁶ San Bernardino County. Countywide Policy Plan web maps: PP-2 “Evacuation Routes.” Accessed March 30, 2022



 **Project Site**

REDLANDS MUNICIPAL AIRPORT COMPATABILITY MAP

Citrus Estates TTM No. 20473
City of Redlands, California

- g) **Less than Significant.** The Project Site is located in an area with moderate threat to fire hazards.¹⁷ It is not located within a High or Very High Fire Hazard Severity Zone. The property is located in an area mixed with developed and undeveloped land. The Project Site is not located adjacent to or near wildlands. The proposed residential development would replace the existing vegetation on site with impervious surface (sidewalks, roads), buildings with fire safety and fire suppression design elements, and proper landscaping, thereby reducing the risk of wildfire. Development of the Proposed Project shall comply with the California Fire Code. Therefore, the Proposed Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. No significant impacts are identified or anticipated, and no mitigation measures are required.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede substantial groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
i) result in substantial erosion or siltation on- or off-site;				
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;				
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				
iv) impede or redirect flood flows?				
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐

¹⁷ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.7-3: Fire Hazards and Fire Safety Services.

- | | Potentially
Significant
Impact | Less than
Significant with
Mitigation | Less than
Significant | No
Impact |
|---|--------------------------------------|---|-------------------------------------|--------------------------|
| e) Conflict with or obstruct implementation of a water quality control plan or substantial groundwater management plan? | ☐ | ☐ | ☒ | ☐ |

- a) **Less than Significant.** The Proposed Project would disturb an approximate 37.9-acre site and would therefore be subject to the National Pollutant Discharge Elimination System (NPDES) permit. The State of California is authorized to administer various aspects of the NPDES. Construction activities covered under the State's General Construction permit include the removal of vegetation, grading, excavating, or any other activity that causes the disturbance of one acre or more. The General Construction permit requires recipients to reduce or eliminate non-storm water discharges into stormwater systems, and to develop and implement a SWPPP. The SWPPP is based on the principles of Best Management Practices (BMPs) to control and abate pollutants. The SWPPP must include BMPs to prevent project-related pollutants from impacting surface waters. The purpose of a SWPPP is to: 1) identify pollutant sources that may affect the quality of discharges of storm water associated with construction activities; and 2) identify, construct and implement storm water pollution control measures to reduce pollutants in storm water discharges from the construction site during and after construction.

The NPDES also requires a Water Quality Management Plan (WQMP), which is subject to review and approval by the City. A preliminary WQMP was prepared for the Proposed Project by Encompass Associates, Inc. (see Appendix G for report). The WQMP includes mandatory compliance of BMPs as well as compliance with NPDES Permit requirements. Review and approval of the WQMP by the City would ensure that all potential pollutants of concern are minimized or otherwise appropriately treated prior to being discharged from the Project Site. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

- b) **Less Than Significant.** The Project Site is located within the City of Redlands water service area. The City's water supply comprises surface water from the Santa Ana River (SAR) and Mill Creek and supplemented by groundwater extracted from the Bunker Hill Basin (part of the San Bernardino Basin) and Yucaipa Basin and a small amount of imported water when needed.¹⁸

The proposed 98 lots would result in an estimated population of 260 and a water demand of 27,342 gallons per day.¹⁹ The Proposed Project is consistent with the land use and population projections included in the General Plan. Therefore, the Proposed Project water demand is already anticipated from buildout of the General Plan Planning Area.

¹⁸ Water Systems Consulting, Inc. and Woodard & Curran. 2020 Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan.

¹⁹ Based on City of Redland's actual 2020 water demand of 279 gallons per capita per day.

Moreover, implementation of the project Best Management Practices (BMPs) would ensure that stormwater discharge does not substantially alter the existing drainage pattern and water quality, thereby allowing runoff from the Project Site to be utilized as a resource that can eventually be used for groundwater recharge. Therefore, the Proposed Project is not anticipated to have a substantial impact on groundwater supplies or interfere substantially with groundwater recharge. No significant impacts are identified or anticipated, and no mitigation measures are required.

c)

i)

Less than Significant. Erosion is the wearing away of the ground surface as a result of the movement of wind or water, and siltation is the process by which water is affected by fine mineral particles in the water. Soil erosion could occur due to a storm event. Construction activities covered under the State of California's General Construction permit include removal of vegetation, grading, excavating, or any other activities that causes the disturbance of one acre or more. The General Construction permit requires recipients to reduce or eliminate non-storm water discharges into stormwater systems, and to develop and implement a Storm Water Pollution Prevention Plan (SWPPP). The purpose of the SWPPP is to: 1) identify pollutant sources that may affect the quality of discharges of stormwater associated with construction activities; and 2) identify, construct, and implement stormwater pollution control measures to reduce pollutants in stormwater discharges from the construction site during and after construction. The SWPPP must list BMPs to avoid and minimize soil erosion. Adherence to BMPs would prevent substantial soil erosion or the loss of topsoil. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

ii, iii, iv) **Less than Significant.** A preliminary Drainage Study, dated December 2, 2021, was prepared for the Proposed Project by Encompass Associates, Inc. (see Appendix H for report). The purpose of the study is to determine the drainage facility requirements for the Proposed Project. Under existing conditions, all flows drain to the north and west, ultimately to San Bernardino Avenue. There is an existing storm drain with catch basins located on San Bernardino Avenue just west of the Project Site.

Under developed conditions, drainage is proposed overland and by sheet flow generally in a northwesterly direction. The Project Site would not be subject to runoff from off-site areas. The Project Site is approximately 37 acres. Only about 28 acres will be developed into single family residences. A portion of the remainder of the site will be established as a park, Lot C, and will consist of 73,455 SF, and the proposed WQMP basin on Lot A is 20,176 SF. The remainder of the perimeter of the site will be established as a landscape buffer.

Runoff from the residences will be conveyed via street flow to catch basins proposed throughout the project, ultimately draining to the project low point located in the northwest corner, just prior to discharge onto San Bernardino Avenue. Low flows will be directed to Lot A in order to address Storm Water Quality Low Impact Development requirements. Overflows in excess of the LID capture requirements will be discharged via a proposed

storm drain out to San Bernardino Avenue and westerly to the existing storm drain located near the intersection of Granite Street.

No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

- d) **Less Than Significant.** Due to the inland distance from the Pacific Ocean and any other significant body of water, tsunamis and seiches are not potential hazards at the site. The Project Site is neither located within a 100-year floodplain nor a 500-year floodplain.²⁰ Therefore, the risk of release of pollutants due to project inundation is low. No significant impacts are identified or anticipated, and no mitigation measures are required.
- e) **Less than Significant.** Requirements of a NPDES permit to be issued for the Proposed Project would include development and implementation of a SWPPP and is subject to RWQCB review and approval. The Proposed Project would not otherwise substantially degrade water quality as appropriate measures relating to water quality protection would be implemented. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
a) No Impact. The physical division of an established community is typically associated with construction of a linear feature, such as a major highway or railroad tracks, or removal of a means of access, such as a local road or bridge, which would impair mobility in an existing community or between a community and an outlying area. The Proposed Project does not include the construction of a linear feature, and the Project Site is currently vacant. Therefore, the Proposed Project would neither physically divide an established community nor cause a significant environmental impact due to conflict with any land use plans or policies. No impacts would occur, and no mitigation measures are required.				
b) Less Than Significant. The Project Site is currently undeveloped and has a zoning of Residential Estate, (14,000 sq. ft. minimum lots) (R-E). This zoning district requires a minimum of 14,000 SF per residential lot and at max, one dwelling unit per lot. The				

²⁰ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.9-2 "Flood Hazards."

Proposed Project includes 98 single-family lots, ranging from 7,842 SF to 12,683 SF. The Project Applicant is requesting approval of a Planning Residential Development (PRD) application. The purpose of the PRD provisions is to provide for greater flexibility in the design of residential developments and the promotion of a more efficient, aesthetically pleasing and desirable use of land.²¹ The PRD allows for a maximum of 3 dwelling units per acre of new development area within the R-E zone. The Proposed Project would have less units than the maximum number of dwelling units (108.8) allowed for the Project Site. Therefore, the Proposed Project would be an allowable use within the R-E zoning district. It would be subject to the development standards established by the R-E zoning district and the Planned Residential Development (PRD) regulations. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒	☐
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☒	☐
a, b) Less than Significant. The Project Site is located within a Mineral Resource Zone-2 (MRZ-2). ²² MRZ-2 are areas where geologic data indicate that significant PCC-Grade aggregate resources are present. Moreover, the Project Site is designated by the State Mining and Geology Board (1987) as containing regionally significant PCC-grade aggregate resources. The Project Site is located in a partially developed, residential area. It is surrounded by single-family residences and a vacant lot to the east; single-family residences and an orange grove to the south; one single-family residence and vacant land to the west; and a park and vacant land to the north. Furthermore, the lands immediately south and west of the Project Site are identified as designated areas lost to land uses incompatible with mining since 1987. Therefore, the surrounding uses make the site unsuitable for mineral resources extraction. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.				

²¹ Redlands Municipal Code. https://codelibrary.amlegal.com/codes/redlandscalatest/redlands_ca/0-0-0-19555#JD_18.144.100

²² Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.11-1: Mineral Resources.

XIII. NOISE

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

- a) **Less than Significant.** A Noise Impact Analysis, dated June 9, 2022, was prepared for the Proposed project by Ganddini Group, Inc. (see Appendix I for report). The purpose of the study is to provide an assessment of the noise impacts resulting from development of the Proposed Project and to identify mitigation measures that may be necessary to reduce those impacts. The noise issues related to the proposed land use and development have been evaluated in light of applicable federal, state and local policies, including those of the City of Redlands.

The unit of measurement used to describe a noise level is the decibel (dB). The human ear is not equally sensitive to all frequencies within the sound spectrum. Therefore, the “A-weighted” noise scale, which weights the frequencies to which humans are sensitive, is used for measurements. Noise levels using A-weighted measurements are written dB(A) or dBA.

Impacts Related to Construction Noise

Construction activities will occur in phases including grading, building construction, paving, and architectural coating. Assumptions for the phasing, duration, and required equipment for the construction of the Proposed Project were obtained from the project applicant.

Construction noise associated with the Proposed Project was calculated utilizing methodology presented in the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual (2018) together with several key construction parameters including: distance to each sensitive receiver, equipment usage, percent usage

factor, and baseline parameters for the Project Site. Distances to receptors were based on the acoustical center of the proposed construction activity.

Modeled unmitigated construction noise levels reached a maximum of 62.9 dBA Leq at the nearest existing residential property line to the west, 68.6 dBA Leq at the nearest existing residential property line to the south, 62.6 dBA Leq at the nearest existing residential property line to the east, and 66.5 dBA Leq at the existing sports park property line to the north of the Project Site.

The City's Municipal Code Sections 8.06.120 (G) and 8.06.090 limit the hours of construction to between the hours of 7:00 AM and 6:00 PM, including Saturdays, with no activities taking place at any time on Sundays or federal holidays. Per the EIR prepared for the City of Redlands General Plan (2019), a substantial temporary increase in ambient noise levels from construction noise would be considered less than significant if construction activities comply with the City's Noise Control Ordinance in the Municipal Code, Section 8.06.090. Project construction will not occur outside of the hours outlined as "exempt" in City's Municipal Code Sections 8.06.120 (G) and 8.06.090; and therefore, will not result in a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance. Impacts would be less than significant.

In addition to adherence to the City of Redlands Municipal Code which limits the construction hours of operation, the following best management practices will be implemented to further reduce construction noise emanating from the Proposed Project:

Construction Noise - Best Management Practices

1. All construction equipment whether fixed or mobile, will be equipped with properly operating and maintained mufflers, consistent with manufacturer standards.
2. All stationary construction equipment will be placed so that emitted noise is directed away from the noise sensitive receptors nearest the project site.
3. As applicable, all equipment shall be shut off when not in use.
4. Equipment staging in areas shall be located to create the greatest distance between construction-related noise/vibration sources and existing sensitive receptors.
5. Jackhammers, pneumatic equipment, and all other portable stationary noise sources will be directed away and shielded from existing residences in the vicinity of the project site. Either one-inch plywood or sound blankets can be utilized for this purpose. They should reach up from the ground and block the line of sight between equipment and existing residences. The shielding should be without holes and cracks.
6. No amplified music and/or voice will be allowed on the project site.
7. Haul truck deliveries will not occur outside of the hours presented as exempt for construction per City's Municipal Code Sections 8.06.120 (G) and 8.06090.

Off-Site Construction Noise

Construction truck trips would occur throughout the construction period. According to the FHWA, the traffic volumes need to be doubled in order to increase noise levels by 3 dBA CNEL. The greatest number of construction-related vehicle trips per day would be during building construction at up to 358 vehicle trips per day (260 for worker trips and 98 for vendor trips). Given the Project Site's proximity to the 210 and 10 Freeways, it is anticipated that vendor and/or haul truck traffic would take the most direct route to the appropriate freeway ramps. Therefore, the addition of project vendor/haul trucks and worker vehicles per day along off-site roadway segments would not be anticipated to result in a doubling of traffic volumes. Off-site project generated construction vehicle trips would result in a negligible noise level increase and would not result in a substantial increase in ambient noise levels. Impacts would be less than significant and no mitigation measures are required.

Noise Impacts to Off-Site Receptors Due to Project-Generated Trips

During operation, the Proposed Project is expected to generate approximately 1,021 average daily trips. Modeled Existing traffic noise levels range between 46.3-75.8 dBA CNEL at the right-of-way of each modeled roadway segment; and the modeled Existing Plus Project traffic noise levels range between 51.1-76 dBA CNEL at the right-of-way of each modeled roadway segment. The City's General Plan 2035 identifies a potentially substantial increase as either an increase of four or more dB, if the resulting noise level would exceed the clearly compatible standards.

Other than the roadway segment of Capri Avenue east of Granite Street, all of the modeled roadway segments noise are anticipated to change a nominal amount (approximately 0 to 3 dBA CNEL) with implementation of the Proposed Project. The modeled roadway segment of Capri Avenue east of Granite Street is anticipated to have an increase of 6 dB. However, the modeled existing plus project noise level along the roadway segment of Capri Avenue east of Granite Street is 52 dBA CNEL, which is below the City's 60 dBA CNEL exterior "clearly compatible" noise level standard for single-family residential uses. Furthermore, this segment has very low existing daily traffic as the majority of the land adjacent to this roadway segment is that of the vacant Project Site. As the Proposed Project is consistent with the City's General Plan existing land use designation, the noise level increase along this segment was already anticipated and accounted for in the City's General Plan. Therefore, a change in noise level would not be readily noticeable and would be less than significant.

Transportation Noise Impacts to the Proposed Project

Per the City of Redlands General Plan, noise levels of up to 60 dBA CNEL are considered "clearly compatible"; and noise levels between 60 and 75 dBA CNEL are considered "normally incompatible" for single-family, multi-family, and mobile home residential uses.

Future noise levels at backyards proposed adjacent to either Wabash Avenue or San Bernardino Avenue are expected to range between 53 and 60 dBA CNEL and will not

exceed the City's outdoor exterior noise standard of 60 dBA CNEL. This impact is less than significant.

Future noise levels at proposed single-family structures adjacent to Wabash Avenue or San Bernardino Avenue are expected to range between 57-60 dBA CNEL at the first floor building facade and between 63 to 66 dBA CNEL at the second story building facade. Upgraded windows and sliding glass doors with a Sound Transmission Class (STC) rating of 24 would be installed in the northern and eastern facades of the home located at the southwest corner of Wabash Avenue and San Bernardino Avenue to ensure that interior noise levels do not exceed 45 dBA CNEL. This impact would be less than significant and no mitigation measures are required.

- b) **Less than Significant.** The Caltrans Transportation and Construction Vibration Guidance Manual (2020) provides a comprehensive discussion regarding groundborne vibration and the appropriate thresholds to use to assess the potential for damage. The threshold at which there is a risk of "architectural" damage to historic structures is a peak particle velocity (PPV) of 0.25 in/sec, and a PPV of 0.3 in/sec at older residential structures. There is a risk of architectural damage at newer residential structures and modern commercial/industrial buildings at a PPV of 0.5 in/sec. In addition, vibration becomes strongly perceptible to people in buildings at a PPV of 0.1; however, the City of Redlands has prohibited the operation of any device that creates a vibration, which is above the vibration perception threshold of an individual at or beyond the property boundary of the source if on private property; or at 150 feet from the source if on a public space or public right-of-way. The City of Redlands Municipal Code, Section 8.06.020, defines the vibration perception threshold as 0.01 inches per second (in/sec) RMS.

The closest existing off-site structure is the residential dwelling unit located approximately 66 feet to the east of the project's eastern property line. Groundborne vibration associated with project construction may reach up to a PPV of 0.049 in/sec at the nearest residential structure to the east of the Project Site and will not exceed the 0.3 PPV (in./sec.) damage potential threshold for residential structures.

To assess the impact in terms of the City's vibration perception, the threshold of 0.01 inches per second (in/sec) RMS was converted to a PPV (0.014 in/sec). Therefore, if a vibratory roller is used within 150 feet of an existing structure or if a large bulldozer is used within 85 feet of an existing structure, there will be some potential for vibration related annoyance.

As concluded in the Noise Impact Analysis, vibration related annoyance could occur at the residential structures to the west, south and east of the Project Site. However, perceptibility of construction vibration would be temporary and would only occur while vibratory equipment is utilized within 150 feet of the existing structures. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

- c) **Less Than Significant.** The nearest airport to the Project Site is the Redlands Municipal Airport, which is located approximately 2,235 feet (or 0.4 miles) to the north of the Project Site. The Redlands Municipal Airport noise contours provided in the Redlands Municipal

Airport Land Use Compatibility Plan (revised May 6, 2003) shows that the Project Site is outside the 60 dBA CNEL noise contour for the airport. The Project Site is located in Airport Compatibility Zone D, which, as per Table 2A of the Redlands Municipal Airport Land Use Compatibility Plan, has no limit on the densities allowed for residential uses. Therefore, the Proposed Project would not expose people residing or working in the area to excessive noise levels. In accordance with the Redlands ALCUP and the project Conditions of Approval, a deed notice shall be required notifying potential buyers and homeowners that an airport is in the vicinity and they can expect aircraft overflight and related effects such as noise. In addition, RMC Chapter 17.28 (Marketing and Disclosure Requirements for New Residential Subdivision Development Located Within the Redlands Airport Influence Area) is a standard requirement and obligates the developer or seller to notify potential buyers of the Redlands airport nearby prior to closing escrow. No significant impacts are identified or anticipated, and no mitigation measures are required.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
a) Less Than Significant. Between 2016 and 2045, Southern California Association of Governments (SCAG) projects that the number of households in Redlands will grow from 24,400 to 30,800 (a 26% increase). ²³ As of 2020, Redlands' population was estimated to be 73,168. By 2045, SCAG projects that Redlands' population will grow to 80,800. The Proposed Project is a planned residential development of 98 single-family residential lots. The population from General Plan buildout was estimated assuming 2.65 persons per household in Redlands. ²⁴ The proposed 98 lots would therefore result in an estimated population of 260. The Proposed Project would account for approximately 3.4% of the projected 25-year growth in Redlands. The Project Site is currently undeveloped and has a zoning of Residential Estate (14,000 sq. ft. minimum lots) (R-E). The Proposed Project would be an allowable use within the R-E zoning district. Therefore, population growth from the Proposed Project is already anticipated from buildout of the Planning Area. No significant adverse impacts are identified or anticipated, and no mitigation measures are required.				

²³ Michael Baker International. 2021-2029 Housing Element - Revised Public Revised Draft. December 2021.

²⁴ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.

- b) **No Impact.** The Project Site is currently undeveloped. Implementation of the Proposed Project would neither displace existing housing nor require construction of replacement housing elsewhere. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

XV. PUBLIC SERVICES

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

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Fire Protection?	☐	☐	☒	☐
Police Protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other Public Facilities?	☐	☐	☒	☐

- a)

Fire Protection

Less than Significant. Fire protection at the Project Site would be provided by the City of Redlands Fire Department (emergency operations, fire prevention services, and emergency medical services). The City of Redlands is served by four Redlands Fire Stations and responds as an all-risk fire and EMS agency. The Redlands Fire Department responded to 11,386 calls for service in 2021 and experiences a 6.65 percent increase on average annually. The Redlands Fire Department is staffed with 52 sworn personnel, of which 41 personnel are Paramedics and 16 are Emergency Medical Technicians. The Redlands Fire Department strives to meet the National Fire Protection Association (NFPA) standards, which recommend that the first arriving unit arrive within four minutes 90 percent of the time. A more lenient goal of arriving eight minutes and 30 seconds 90 percent of the time, per the June 25, 2020, Fire Department Assessment and Deployment Study for the Redlands Fire Department, is a more realistic objective given the analysis within this study.

Currently, only 34 percent of the city is within an Effective Response Force (ERF) during congested periods. The Fire Department will be able to improve service levels with the addition of two new fire stations and the relocation of a third. This will increase the four-minute service response time by 60 percent, providing an improvement in the ability of first responders to reach areas within the community that are currently outside of a four-minute response time window. Redlands Fire Station 263, located at 10 W. Pennsylvania, is approximately 2.1 miles west of the Project Site. Average travel time between Station 263 and the Project Site is approximately six minutes. San Bernardino County Fire Station 9, located at 1300 Crafton Avenue, is located approximately 1.0 mile east of the Project Site. Average travel time between County Fire Station 9 and the Project Site is approximately four minutes. Automatic aid provided by Station 9 to the City of Redlands is a contractual arrangement that ensures the best outcome for the patient and/or reduced property loss. This agreement is designed to have reciprocity and cooperation among fire agencies and can be rescinded if reciprocity is not achieved. Redlands Fire Department responds to multiple calls at one time (2 or more) 13.83 percent of the time. This is a significant percentage of calls that continues to rise based on the current fire and EMS defense system in the City.

Development of the Proposed Project may incrementally increase the demand for fire protection services as it could increase the local area's population by approximately 260 additional residents. The Proposed Project is required to meet minimum fire safety requirements of Title 24 which helps to support fire suppression activities, including building construction, automatic fire sprinkler systems, fire hydrants, and paved fire access. The City's Fire Department and the Building Division enforce fire safety standards during review of building plans and inspections. Development impact fees (DIF) are collected at the time of building permit issuance and would increase funding to assist in reducing impacts to fire protection services. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation are required.

Police Protection

Less than Significant. The City of Redlands Police Department (RPD) provides police protection for the Project Site and vicinity. The service ratio for the City is 1.1 officers per 1,000 residents. Though the City does not have a service ratio standard, the City recognizes that its ratio falls below the national average of 2.1, and that hiring additional officers would be optimal.²⁵ In 2015, the Department had an average response time of 6.5 minutes for police services. Although there are no industry standards for response time to emergency calls, according to the City of Redlands, a response time of 4.5 minutes is desirable in a city of Redlands' size. Development of the Proposed Project may incrementally increase the demand for police protection services due to the increased population on the site. In its review of new development plans, the RPD evaluates project plans on its ability to provide proper police protection to the development. Additionally, the proponent of the Proposed Project would be required to pay service fees and DIF to the RPD. The DIF would be used to fund capital costs associated with acquiring land for new police stations, constructing new police stations, purchasing crime-fighting equipment for

²⁵ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.

new police stations, and providing for additional staff as needed and as identified by the City. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Schools

Less than Significant. The Redlands Unified School District (RUSD) provides public schools in the Planning Area, which includes the Project Site. The following schools within RUSD provide educational services to the project area: Judson & Brown Elementary School, Clement Middle School, and Redlands East Valley High School. As of the 2019-2020 school year, Kingsbury Elementary School has a capacity for an additional 30 students; Clement Middle School has a capacity for an additional 256 students; and Redlands East Valley High School has a capacity for an additional 1,858 students.²⁶²⁷

The Proposed Project would increase the population in the local area and would consequently add students to the local school system. The RUSD has accounted for the generation of its student population through its facilities planning activities based on the City's buildout. Development of the Proposed Project has been included in the buildout of the General Plan; as such, RUSD does not anticipate further growth in its boundary that would exceed planned development associated with the City's buildout. Construction and operation of new school facilities are funded through school impact fees assessed on new developments that occur within the school district. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Parks

Less than Significant. The Redlands Parks Division currently operates 18 parks.²⁸ The Redlands Sports Park is located immediately north of the Project Site. Therefore, the residents of the Proposed Project are anticipated to increase the use of Redlands Sport Park. A portion of the park (36.2 acres) has been developed for active recreation, with 60 acres as yet unbuilt. Future improvements will include additional athletic fields.²⁹ In 2035, with the development of 140.9 acres of proposed parkland as designated in the General Plan, and the addition of 10,355 residents, the ratio will be 6.9 acres per 1,000 residents, which would exceed the City's park standard of 5 acres per 1,000 people.³⁰

The Redlands Municipal Code provides for open space and park fees (i.e. DIF) to be imposed as a condition of approval of new residential, commercial, and office and industrial development (Chapter 3.32). The DIF are intended to ensure that open space lands and active and passive parks are made available to the public concurrent with the need for such lands and parks caused by new development. They may be used to pay for

²⁶ Full Enrollment of Schools as listed in Table 3.13-3 of Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.

²⁷ 2019-2020 Enrollment as listed in

<https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdLevels.aspx?cds=3667843&aggllevel=District&year=2019-20>

²⁸ City of Redlands. City-Owned and Operated Parks. <https://www.cityofredlands.org/parks>

²⁹ Dyett and Bhatia. City of Redlands General Plan 2035. Adopted December 5, 2017.

³⁰ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.

costs incurred by the City for acquiring, developing, improving, and expanding open space areas, scenic drives, parks, playgrounds, and recreational facilities to meet the increased needs for those facilities resulting from the effects of new development. Collection of the DIF would ensure no significant impacts to parks would occur. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Other Public Facilities

Less than Significant. DIF are charged by local governments to defray all or a portion of the cost of public facilities related to development projects. The requirements for enactment of a development impact fee program are set forth in Government Code Sections 66000-66025 (the "Mitigation Fee Act"). In Redlands, DIF are collected at the time a building permit is issued for the purpose of mitigating the impacts caused by new development on the City's infrastructure. Fees are used to finance the acquisition, construction, and improvement of public facilities needed as a result of a new development. A separate funding structure has been established to account for the impact of new development on each of the following types of public facilities: Open Space, Parks, Public Facilities (including public safety, library and general government facilities), Transportation, Water, Solid Waste, and Sewer. Collection of developer impact fees would ensure no significant impacts to other public facilities would occur. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

XVI. RECREATION

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

Less than Significant. The Redlands Parks Division currently operates 18 parks.³¹ The Redlands Sports Park is located immediately north of the Project Site. Therefore, the anticipated 260 residents of the Proposed Project are anticipated to increase the use of Redlands Sport Park. A portion of the park (36.2 acres) has been developed for active recreation, with 60 acres as yet unbuilt. Future improvements will include additional athletic fields.³² In 2035, with the development of 140.9 acres of proposed parkland as designated in the General Plan, and the addition of 10,355 residents, the ratio will be

³¹ City of Redlands. City-Owned and Operated Parks. <https://www.cityofredlands.org/parks>

³² Dyett and Bhatia. City of Redlands General Plan 2035. Adopted December 5, 2017.

6.9 acres per 1,000 residents, which would exceed the City's park standard of 5 acres per 1,000 people.³³

The Redlands Municipal Code provides for open space and park fees to be imposed as a condition of approval of new residential, commercial, and office and industrial development (Chapter 3.32). The fees are intended to ensure that open space lands and active and passive parks are made available to the public concurrent with the need for such lands and parks caused by new development. They may be used to pay for costs incurred by the City for acquiring, developing, improving, and expanding open space areas, scenic drives, parks, playgrounds, and recreational facilities to meet the increased needs for those facilities resulting from the effects of new development. Collection of developer impact fees would ensure no significant impacts to parks would occur. Additionally, the Proposed Project would include development of a park for its future residents. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

- a) **Less than Significant.** The Proposed Project includes 20 lettered lots. Lot B would be developed as a paseo, Lot C as a park, and Lots D and E as landscape buffers along property boundaries. The remaining lettered lots are proposed as landscape buffers along street blocks. Development of these lots and its potential environmental impacts have been analyzed and discussed throughout this environmental document. Impacts pertaining to the development of the on-site open space would be less than significant. No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

XVII. TRANSPORTATION

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

³³ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.

- a) **Less Than Significant.** A Traffic Impact Analysis (TIA), dated May 17, 2022, prepared for the Proposed Project by Michael Baker International (see Appendix J for report). The TIA determined that the Proposed Project would generate approximately 1,021 total trips with a trip generation rate of 10.42 trips per dwelling unit per day. The Proposed Project trips were estimated using trip generation rates obtained from the Institute of Transportation Engineers' (ITE) Trip Generation Manual (10th Edition) for land use code 210 (Single-Family Detached Housing). It should be noted after the initial scoping process with city staff, ITE published the 11th Edition Trip Generation Manual with updated rates. Based on a review of the 11th Edition rates, the proposed 98 dwelling units would be forecasted to generate fewer trips utilizing the updated rates than what was estimated for the Proposed Project. Therefore, the results of the TIA provide a more conservative assessment utilizing the 10th Edition rates.

The Connected City theme of the City General Plan promotes an efficient and integrated circulation system by enhancing the vehicular, biking, walking, and transit networks. The following analysis details project consistency with the applicable Connected City proposed actions:

5-A.3: Ensure new street design and potential retrofit opportunities for existing streets minimize traffic volumes and/or speed as appropriate within residential neighborhoods without compromising connectivity for emergency vehicles, bicycles, pedestrians, and users of mobility devices.

Consistency: The Proposed Project would be required to provide right-of-way easements, thereby allowing emergency vehicles to pass through the main roads. In addition, the landscape buffers planned along the northern, southern, and eastern perimeter of the Project Site includes pedestrian trails.

5-A.24: Use the City's Bicycle Master Plan as the primary resource for planning and implementing bikeway improvements.

5-A.27: Implement bicycle and trail improvements that provide strong north-south connections, especially with major east-west trails, including routes on Mountain View Avenue, California Street, Nevada Street, Alabama Street, Texas Street, New York Street, Orange Street, Church Street, Dearborn Street, and Wabash Avenue.

Consistency: A future bicycle route is planned along Wabash Avenue and San Bernardino Avenue adjacent to the Project Site.³⁴ The Proposed Project would be required to provide right-of-way easements, which would allow for future bicycle and trail improvements along Wabash Avenue and San Bernardino Avenue. In addition, the landscape buffers planned along the northern, southern, and eastern perimeter of the Project Site includes pedestrian trails.

³⁴ Dyett and Bhatia. City of Redlands General Plan 2035. Adopted December 5, 2017. Figure 5-3: "Bicycle Facilities."

5-A.47: Maximize the carrying capacity of arterials and boulevards by controlling the number of driveways and intersections, limiting residential access where applicable, and requiring sufficient on-site parking to meet the needs of proposed projects.

Consistency: The proposed 98 lots would all share the same central entry points, “A Street” and “B Street.” The Proposed Project includes driveways and garage space for each residential lot, and off-street parking within the proposed interior streets.

5-A.50: Plan an integrated network of collector and local streets serving new neighborhoods. Design cul-de-sacs so they have pedestrian/bike connections at the terminus.

Consistency: The Proposed Project would include local interior streets “C” through “I,” which would connect to San Bernardino Avenue (minor arterial)³⁵ via “B Street” and connect to Capri Avenue (local road) via “A Street.” In addition, the Proposed Project would provide a landscape buffer along the eastern, southern, and northern perimeters of the Project Site. There are pedestrian trails proposed within the landscape buffers. The cul-de-sacs have pedestrian/bike connections at the terminus that would connect the sidewalks within the interior streets to these trails.

5-A.68: Provide for direct pedestrian paths and access from new developments to the nearest public transportation stop.

Consistency: The nearest bus stop to the Project Site is the Omnitrans Route 8 bus stop at the intersection of Wabash Avenue and Lugonia Avenue. The residents of the Proposed Project would be able to access Wabash Avenue via the proposed “A Street” and “B Street,” the proposed paseo that leads to Capri Avenue, and the pedestrian connections at the cul-de-sacs.

As demonstrated, the Proposed Project is not anticipated to conflict with the Connected City theme of the General Plan. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

- b) **Less than Significant.** A Vehicle Miles Traveled (VMT) assessment memorandum, dated May 17, 2022, was prepared for the Proposed Project by Michael Baker International (see Appendix K for report). The Proposed Project is anticipated to generate 1,021 daily trips, 73 AM peak hour trips, and 100 PM peak hour trips during an average weekday. Based on the City of Redlands CEQA Assessment VMT Analysis Guidelines, land use projects that meet certain screening thresholds based on size, location, proximity to transit or trip-making potential are presumed to result in a less-than-significant transportation impact under CEQA and do not require a detailed quantitative VMT assessment. The Proposed Project meets the Screening Criteria for Project Type, thus allowing for a determination of a less than significant impact on VMT. Therefore, a detailed project-specific VMT

³⁵ Dyett and Bhatia. City of Redlands General Plan 2035. Adopted December 5, 2017. Figure 5-5: “Roadway Classification.”

assessment is not required. No significant impacts are identified or anticipated, and no mitigation measures are required.

c)

Less than Significant. The Project Site is not adjacent to windy roads or dangerous intersections. The Proposed Project is a tentative tract map to include 98 single-family residential lots and 20 lettered lots. It does not include a geometric design or incompatible uses that would substantially increase hazards. The Proposed Project would be compatible with the surrounding residential uses. The design of the proposed streets must provide adequate sight distance and traffic control measures. Roadway frontage improvements in and around the Project site would be designed and constructed to satisfy all City requirements for street widths, corner radii, and intersection control, as well as incorporate design standards tailored specifically to site access requirements. The Site Plan is subject to approval by the City of Redlands Fire Department. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

d)

No Impact. Access to the Project Site would be provided by two central entry points “A Street” and “B Street,” each with a raised median. The Proposed Project will comply with Section 18.164.080 Single-Family Residential Dwellings, of the City Municipal Code requiring the Proposed Project to provide two covered parking spaces in a garage or carport for every dwelling unit. The proposed interior streets would be 36-feet-wide, and “A Street” and “B Street” would each be 44-feet-wide with the raised median included, allowing sufficient space for street parking and residential traffic. Therefore, residents and their visitors are not anticipated to park along San Bernardino Avenue, Wabash Avenue, or Capri Avenue. During construction, the contractor would be required to maintain adequate emergency access for emergency vehicles. Project operations would not interfere with an adopted emergency response or evacuation plan. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

XVIII. TRIBAL CULTURAL RESOURCES

Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
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a)

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is?

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or?

☐	☐	☒	☐
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	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☒	☐	☐
a) i) Less Than Significant With Mitigation. BFSA prepared a Cultural Resources study with the conclusion that there was no indication of the presence of any visible archaeological resources within the project. However, the absence of positive results does not necessarily indicate the absence of historic resources. There is an indication that the Project Site retains a high level of probability for the presence of buried historic and prehistoric resources, including irrigation features. An archaeological records search for the project and the surrounding area within a one-mile radius was compiled using previous records searches conducted by the SCCIC at CSU Fullerton. The available data indicated that there are a total of 47 cultural resources located within one mile of the Project Site, none of which are located within the Project Site. These sites include one prehistoric lithic scatter, 13 historic water conveyance system sites, one historic water conveyance system and refuse scatter site, six historic refuse scatters, eight historic farms/orchards, one historic structure, one historic single-family residence, 11 historic road alignments, one historic cobble ring features, one historic railroad alignment, and four historic glass fragment isolates, 36 cultural resources studies have been conducted within a one-mile radius of the Project Site, one of which includes the Project Site. With implementation of Mitigation Measures CR-1 to CR-5 identified above, potential impacts to historical resources with Native American cultural value are anticipated to be less than significant.				
ii) Less Than Significant with Mitigation. California Assembly Bill 52 (AB52) was approved by Governor Brown on September 25, 2014. AB52 specifies that CEQA projects with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource may have a significant effect on the environment. As such, the bill requires lead agency consultation with California Native American tribes traditionally and culturally affiliated with the geographic area of a proposed project, if the tribe requested to the lead agency, in writing, to be informed of proposed projects in that geographic area. The legislation further requires that the tribe-requested consultation be completed prior to determining whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project.				

On January 20, 2022, the City provided notification to the following tribes in accordance with AB52: the Gabrieleno Band of Mission Indians – Kizh Nation (Gabrieleno), Soboba Band of Luiseno Indians (Soboba), San Manuel Band of Mission Indians (San Manuel), Torres Martinez Desert Cahuilla Indians, and Morongo Band of Mission Indians (Morongo).

The Gabrieleno requested consultation but then deferred the project to San Manuel. In an email dated January 24, 2022, San Manuel indicated that the Project Site exists within Serrano ancestral territory and is therefore of interest to the Tribe. The Tribe requested that the following mitigation measures be incorporated:

TCR-1: The Consulting Tribe(s) shall be contacted of any pre-contact and/or historic-era cultural resources discovered during project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a cultural resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with the Consulting Tribe(s), and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents the Consulting Tribe(s) for the remainder of the project, should the Consulting Tribe(s) elect to place a monitor on-site.

TCR-2: Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to the Consulting Tribe(s). The Lead Agency and/or applicant shall, in good faith, consult with the Consulting Tribe(s) throughout the life of the project.

With implementation of Mitigation Measures TCR-1 and TCR-2 identified above, potential impacts to Native American tribal resources are anticipated to be less than significant.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
development during normal, dry and multiple dry years?				
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐
a) Less Than Significant. The Project Site is located within the City of Redlands water and sewer service area. The Proposed Project would include the development of on-site water delivery infrastructure through 8- inch water pipes in the proposed interior streets as well as laterals serving each of the 98 proposed residential units. The Project Applicant would construct water lines along San Bernardino Avenue that the Proposed Project would connect to. The environmental impacts from the construction of water lines are anticipated to be negligible.				
The Proposed Project would be served by the City of Redlands for sewer service. The Project Applicant would construct sewer lines along San Bernardino Avenue that the Proposed Project would connect to. The environmental impacts from the construction of sewer lines are anticipated to be negligible.				
The Proposed Project would be serviced by Southern California Edison (SCE), which provides electrical service to the general area. There are existing utility poles on the south side of San Bernardino Avenue, the west side of Wabash Avenue, and the north side that the Proposed Project would connect to. Southern California Gas (SoCal) would provide natural gas for the Proposed Project. There are existing natural gas distribution lines along Wabash Avenue that the Proposed Project would connect to.				
Runoff from the residences will be conveyed via street flow to catch basins proposed throughout the Project Site, ultimately draining to the project low point located in the northwest corner, just prior to discharge onto San Bernardino Avenue. Low flows will be directed to Lot A in order to address Storm Water Quality Low Impact Development requirements. Overflows in excess of the LID capture requirements will be discharged via				

a proposed storm drain out to San Bernardino Avenue and westerly to the existing storm drain located near the intersection of Granite Street.

The Proposed Project would be serviced by Frontier for landline requirements and Charter Spectrum for cable. The Proposed Project is not anticipated to require the expansion or construction of new communications systems facilities. Furthermore, the telecommunication lines would be joint trenched with the electricity and natural gas lines.

The Proposed Project is not anticipated to require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electrical power, natural gas, or telecommunications facilities that could cause significant environmental effects. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

- b) **Less than Significant.** The Project Site is located within the City of Redlands water service area. The City's water supply comprises surface water from the Santa Ana River (SAR) and Mill Creek, groundwater extracted from the Bunker Hill Basin and Yucaipa Basin, and imported water when needed.³⁶ The Urban Water Management Plan (UWMP) for City of Redlands is based on projected growth included in General Plan.

Per UWMP requirements, Redlands has evaluated reliability for an average year, single dry year, and a 5 consecutive dry year period. The City's demands in single dry years are assumed to increase by 10% above normal year demands. The local groundwater basins Redlands produces water from have storage for use in dry years. Redlands' supplies are 100% reliable during normal and single dry years.³⁷ Moreover, Redlands can produce the volume of water needed to meet 100% of projected demands in multiple dry years.³⁸

The population from General Plan buildout was estimated assuming 2.65 persons per household in Redlands.³⁹ The proposed 98 lots would result in an estimated population of 260 and a water demand of 27,342 gallons per day.⁴⁰ The Proposed Project is consistent with the land use and population projections included in the General Plan. Therefore, the Proposed Project's water demand is already anticipated from buildout of the General Plan Planning Area. Since the City has sufficient water supplies to meet current and future development consistent with its General Plan as projected through the year 2035, additional water storage and treatment facilities are not anticipated to be required through build out of the General Plan in 2035.

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

³⁶ Water Systems Consulting, Inc. and Woodard & Curran. 2020 Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan.

³⁷ Water Systems Consulting, Inc. and Woodard & Curran. 2020 Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan.

³⁸ Water Systems Consulting, Inc. and Woodard & Curran. 2020 Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan.

³⁹ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.

⁴⁰ Based on City of Redland's actual 2020 water demand of 279 gallons per capita per day.

- c) **Less Than Significant.** Sewer service in the General Plan Planning Area is provided by the City of Redlands. The Redlands Wastewater Treatment Plant (WWTP) has a secondary treatment capacity of 9.5 million gallons per day (mgd).⁴¹ Approximately 6 million gallons of that capacity is in a membrane bioreactor system, the remaining 3.5 million gallons is in a conventional activated sludge process. The Proposed Project is anticipated to generate 19,992 gallons of wastewater per day⁴² or 0.02 percent of the WWTP's capacity. The wastewater generated would not exceed the WWTP's daily capacity. The Proposed Project would generate wastewater that can be discharged to a municipal system with sufficient capacity.

The WWTP meets all current regional, State, and federal requirements for secondary treatment. The City regularly samples the WWTP's influent and effluent to ensure compliance with State regulations. Current regulations require compliance with water quality standards and these measures would preclude development lacking adequate utility capacity, including wastewater treatment capacity. The Proposed Project would be reviewed by the City and the applicable wastewater providers to determine that sufficient sewer capacity exists to serve the additional population that would be generated by the Proposed Project. The City would continue to coordinate with the wastewater service providers to ensure that new development would not exceed the capacity of wastewater conveyance and treatment facilities, and that new development would pay development fees to increase capacity of those facilities. No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

- d) **Less than Significant.** Solid waste from Redlands is primarily disposed of at the California Street Landfill operated by the City and the San Timoteo Sanitary Landfill operated by the County, both within the city limits. The California Street Landfill is located at 2151 Nevada Street and encompasses 115 acres. Its design capacity is 11.4 million cubic yards, and its maximum permitted capacity is 10 million cubic yards. It has a maximum permitted throughput of 829 tons per day. As of July 25, 2018, it has a remaining capacity of 5,168,162 cubic yards.⁴³ The San Timoteo Sanitary Landfill is located on San Timoteo Canyon Road and is 366 acres in size. It has a permitted capacity of 20,400,000 cubic yards and a maximum permitted daily throughput of 2,000 tons. As of April 30, 2019, the remaining capacity was 12,360,396 cubic yards.⁴⁴ The Proposed Project includes 98 residential lots. According to CalRecycle's estimated solid waste generation rates for single-family residences, the Proposed Project would generate approximately 980 pounds of solid waste per day, or approximately 0.49 tons per day, based on 10 pounds per unit per day.⁴⁵ Therefore, the Proposed Project solid waste generation contribution to these landfills would be nominal and would not exceed the daily permitted capacities of these facilities. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

⁴¹ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.

⁴² Black & Veatch Wastewater Collection System Master Plan. Prepared for the East Valley Water District. Land Use Sewer Generation Study Results. October 18, 2013. (204 gallons per day per unit)

⁴³ CalRecycle. Solid Waste Information System database.

⁴⁴ CalRecycle. Solid Waste Information System database.

⁴⁵ CalRecycle. Estimated Solid Waste Generation Rates. Accessed April 5, 2022.

- e) **Less than Significant.** The Proposed Project would be required to comply with City of Redlands Municipal Chapter 13.66 (Recycling Requirements for Specified Developmental Activity). Chapter 13.66 establishes requirements for recycling by specified development activities to facilitate the City's compliance with state recycling mandates, remove architectural barriers to recycling and ensure the recycling of construction and demolition. Future residents would be required to coordinate with a waste hauler to collect solid waste on a common schedule as established in applicable local, regional, and State programs. The Proposed Project shall adhere the California Integrated Waste Management Act of 1989 (AB 939), AB 1327, Chapter 18 (California Solid Waste Reuse and Recycling Access Act of 1991), and any other applicable local, State, and federal solid waste management regulations. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

XX. WILDFIRE

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

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

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan? | ☐ | ☐ | ☐ | ☒ |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | ☐ | ☐ | ☒ | ☐ |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary ongoing impacts to the environment? | ☐ | ☐ | ☒ | ☐ |
| d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | ☐ | ☐ | ☒ | ☐ |
- a) **No Impact.** The Project Site does not contain any emergency facilities.⁴⁶ It is adjacent to San Bernardino Avenue, Capri Avenue, and Wabash Avenue, which are not evacuation

⁴⁶ San Bernardino County. Countywide Policy Plan web maps: PP-1 "Critical Facilities." Accessed March 30, 2022.

routes.⁴⁷ The Proposed Project will comply with Section 18.164.080 Single-Family Residential Dwellings, of the City Municipal Code requiring the Proposed Project to provide two covered parking spaces in a garage or carport for every dwelling unit. The proposed interior streets would be 36-feet-wide, and “A Street” and “B Street” would each be 44-feet-wide with the raised median included, allowing sufficient space for street parking and residential traffic flow. During construction, the contractor would be required to maintain adequate emergency access for emergency vehicles. Project operations would not interfere with an adopted emergency response or evacuation plan. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

- b) **Less than Significant.** The Project Site is located in an area with moderate threat to fire hazards.⁴⁸ It is not located within a High or Very High Fire Hazard Severity Zone. The property is located in an area mixed with developed and undeveloped land. The Project Site is not located adjacent to or near wildlands. Development of the Proposed Project shall comply with the California Fire Code. Therefore, the Proposed Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. No significant impacts are identified or anticipated, and no mitigation measures are required.
- c) **Less than Significant.** The Proposed Project may include the installation of utilities; however, installation, operation and maintenance of utilities would be in compliance with fire safety regulations. The Project Site is not located within a Very High Fire Hazard Severity Zone.⁴⁹ The proposed residential development would replace the existing vegetation on site with impervious surface (sidewalks, roads), buildings with fire safety and fire suppression design elements, and proper landscaping, thereby reducing the risk of wildfire. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.
- d) **Less than Significant.** The Project Site is neither located within a 100-year floodplain nor a 500-year floodplain.⁵⁰ Furthermore, it is not located within a High or Very High Fire Hazard Severity Zone. The property is located in a relatively flat area mixed with developed and undeveloped land. The Project Site is not located adjacent to or near wildlands. Therefore, the Proposed Project would not expose persons or structures to post-fire slope instability or post-fire drainage. No significant impacts are identified or are anticipated, and no mitigation measures are required.

⁴⁷ San Bernardino County. Countywide Policy Plan web maps: PP-2 “Evacuation Routes.” Accessed March 30, 2022

⁴⁸ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.7-3: Fire Hazards and Fire Safety Services.

⁴⁹ Placeworks. San Bernardino Countywide Policy Plan Draft EIR. Hazards and Hazardous Materials. Figure 5.8-6 “Fire Severity and Growth Areas in the East Desert Regions.”

⁵⁰ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.9-2 “Flood Hazards.”

XXI. MANDATORY FINDINGS OF SIGNIFICANCE:

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact
a) Does the project 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?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐
a) Less than Significant with Mitigation. A Biological Technical Report was prepared in October 2021 for the Proposed Project by HELIX. No special status plant species known to the region were observed within the Project Site; none have potential to occur due to lack of suitable habitat. Therefore, no impacts to special status plant species would occur as a result of project implementation. Similarly, no special status animal species were observed or otherwise detected within the Project Site; none have a moderate or high potential to occur due to lack of suitable habitat. A single California state species of special concern bird, burrowing owl, is known to the region and has a low potential to occur. No evidence of burrowing owl was observed or otherwise detected within the Project Site. The Proposed Project shall include pre-construction take avoidance surveys in accordance with protocol guidelines set forth by the CDFW. With the implementation of take avoidance measures, potential impacts on burrowing owl would be less than significant. The Project Site supports suitable nesting habitat for other bird species protected under the federal MBTA and CFG Code. If removal of nesting habitat for birds protected under the MBTA and CFG Code must occur during the general breeding season (January 15 to September 15), the project shall be required to complete pre-construction surveys to ensure that no inadvertent impacts on nesting birds occur. With the implementation of the Mitigation Measures BIO-1 and BIO-2, potential impacts of the project on biological resources would be less than significant.				

BFSa prepared a Cultural Resources study with the conclusion that there was no indication of the presence of any visible archaeological resources within the project. However, the absence of positive results does not necessarily indicate the absence of historic resources. There is an indication that the Project Site retains a high level of probability for the presence of buried historic and prehistoric resources, including irrigation features. An archaeological records search for the project and the surrounding area within a one-mile radius was compiled using previous records searches conducted by the SCCIC at CSU Fullerton. The available data indicated that there are a total of 47 cultural resources located within one mile of the Project Site, none of which are located within the Project Site. These sites include one prehistoric lithic scatter, 13 historic water conveyance system sites, one historic water conveyance system and refuse scatter site, six historic refuse scatters, eight historic farms/orchards, one historic structure, one historic single-family residence, 11 historic road alignments, one historic cobble ring features, one historic railroad alignment, and four historic glass fragment isolates. 36 cultural resources studies have been conducted within a one-mile radius of the Project Site, one of which includes the Project Site. The field survey did not result in the identification of any historic or prehistoric cultural resources. With implementation of Mitigation Measures CR-1 to CR-5 identified above, the Proposed Project would not eliminate important examples of the major periods of California history or prehistory.

- b) **Less than Significant.** Cumulative impacts are defined as two or more individual affects that, when considered together, are considerable or that compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the development when added to the impacts of other closely related past, present, and reasonably foreseeable or probable future developments. Cumulative impacts can result from individually minor, but collectively significant, developments taking place over a period. The CEQA Guidelines, Section 15130 (a) and (b), states:

- (a) Cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable.
- (b) The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided of the effects attributable to the project. The discussion should be guided by the standards of practicality and reasonableness.

Air Quality

Development of the Proposed Project will be conditioned to comply with current SCAQMD rules and regulations to minimize impacts to air quality as discussed. Approval of the project does not require a zone change nor a general plan amendment and is consistent with the City General Plan. Therefore, cumulative impacts are anticipated to be less than significant.

Greenhouse Gas

Greenhouse gas (GHG) emissions are cumulative in nature, in that, no one single project can measurably contribute to climate change and its affects (global average change in temperature, rising sea levels etc.). The direct or indirect GHG impacts are therefore not evaluated on a local level, but whether or not the GHG emissions resulting from the project are cumulative; that is, they add considerably to an increase in GHGs as compared to the existing environmental setting based on: 1) an established significance threshold(s); or 2) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

The project's total net operational GHG emissions do not exceed the CAP threshold of 6 MT CO₂e per capita per year. Therefore, the Proposed Project is consistent with the CAP. The Proposed Project's incremental contribution to greenhouse gas emissions and their effects on climate change would not be cumulatively considerable.

Although cumulative impacts are always possible, the Proposed Project, by incorporating all mitigation measures outlined herein, would reduce its contribution to any such cumulative impacts to less than cumulatively considerable. Therefore, with the incorporation of mitigation identified in this document, the Proposed Project would result in individually limited, but not cumulatively considerable, impacts.

- c) **Less than Significant.** The development of the Proposed Project would not cause adverse impacts on humans, either directly or indirectly. Based on Leighton's study, construction of the proposed residential development is feasible from a geotechnical standpoint. The most significant geotechnical issues with respect to the project are those related to the potential for strong seismic shaking, the presence of potentially compressible soil, and the presence of boulders. Good planning and design of the project can limit the impact of these constraints. With adherence to the City of Redlands Development Code, the Proposed Project is not anticipated to result in a safety hazard for people residing or working at the Project Site.

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