City Center Project

Sustainable Communities Environmental Assessment

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1 INTRODUCTION

This Sustainable Communities Environmental Assessment (SCEA) has been prepared pursuant to Section 21155.2 of the California Public Resources Code (PRC).

1.1 Project Description Summary

The subject of this SCEA is a proposed mixed-use development known as the City Center Project (Project; proposed Project). The Project site is comprised of multiple parcels bordered by commercial buildings, single-family residences, W Citrus Avenue, Brookside Avenue, and Eureka Street. The Project site is currently vacant but has been previously graded.

The Project proposes the development of one four-story apartment building with 131 multi-family dwelling units and three restaurant pads on the 3.03-acre site.

1.2 Background Information on Senate Bill 375 and the SCEA

The State of California adopted Senate Bill 375 (SB 375), also known as "The Sustainable Communities and Climate Protection Act of 2008," which outlines growth strategies that better integrate regional land use and transportation planning, and that help meet the State's greenhouse gas (GHG) emission reduction mandates. SB 375 requires the State's 18 metropolitan planning organizations to incorporate a "sustainable communities strategy" (SCS) into the regional transportation plans to achieve their respective region's GHG emission reduction targets set by the California Air Resources Board (CARB). Correspondingly, SB 375 provides various California Environmental Quality Act (CEQA) streamlining provisions for projects that are consistent with an adopted applicable SCS and meet certain objective criteria. One such CEQA streamlining tools is the SCEA.

The Southern California Association of Governments (SCAG) is the metropolitan planning organization for the County of San Bernardino (along with the Counties of Los Angeles, Imperial, Riverside, Orange, and Ventura). On September 3, 2020, SCAG's Regional Council adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS). For the SCAG region, CARB has set GHG emission reduction targets at 19 percent per capita reduction by 2035 relative to 2005 levels. The 2020-2045 RTP/SCS outlines strategies to meet or exceed the targets set by CARB. By Executive Order G-20-239, approved on October 30, 2020, CARB officially determined that the 2020-2045 RTP/SCS would achieve CARB's 2035 emission reduction targets.

SB 375 allows the City of Redlands, acting as Lead Agency, to prepare a SCEA as the environmental CEQA clearance for "transit priority projects" (as described below) that are consistent with SCAG's 2020-2045 RTP/SCS.

1.3 Transit Priority Project Criteria

SB 375 provides CEQA streamlining benefits to qualifying transit priority projects (TPPs). For purposes of projects in the SCAG region, a qualifying TPP is a project that meets the following four criteria (see PRC 21155 (a) and (b)):

- Is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in the SCAG 2020-2045 RTP/SCS;
- Contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;
- Provides a minimum net density of at least 20 dwelling units per acre; and
- Is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

1.4 SCEA Process and Streamlining Provisions

Qualifying TPPs that have incorporated all feasible and applicable mitigation measures, performance standards, or criteria set forth in the prior applicable EIR (SCAG's 2020-2045 RTP/SCS Program EIR), and that are determined to not result in significant and unavoidable environmental impacts, may be approved with a SCEA. The specific substantive and procedural requirements for the approval of a SCEA include the following:

1. An initial study shall be prepared for a SCEA to identify all significant impacts or potentially significant impacts of the TPP, except for the following:
    a. Growth-inducing impacts, and
    b. Project-specific or cumulative impacts from cars and light trucks on global warming or the regional transportation network.

    Note: all relevant and feasible 2020-2045 RTP/SCS Program EIR mitigation measures shall be incorporated into the Project prior to conducting the initial study analysis.
2. The initial study shall identify any cumulative impacts that have been adequately addressed and mitigated in a prior applicable certified EIR. Where the lead agency determines the impact has been adequately addressed and mitigated, the impact shall not be cumulatively considerable.
3. The SCEA shall contain mitigation measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the project required to be identified in the initial study.
4. A draft of the SCEA shall be circulated for a public comment period of no less than 30 days, and the lead agency shall consider all comments received prior to acting on the SCEA.
5. The SCEA may be approved by the lead agency after the lead agency's legislative body conducts a public hearing, reviews comments received, and finds the following:
    a. All potentially significant or significant effects required to be identified in the initial study have been identified and analyzed, and
    b. With respect to each significant effect on the environment required to be identified in the initial study, either of the following apply:
        i. Changes or alterations have been required in or incorporated into the project that avoid or mitigate the significant effects to a level of insignificance.
        ii. Those changes or alterations that are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
6. The lead agency's decision to review and approve a TPP with a SCEA shall be reviewed under the substantial evidence standard.

1.5 Required Findings

The City of Redlands finds, based on the information contained in Section 2 (Environmental Setting), Section 3 (Project Description), Section 4 (Sustainable Communities Environmental Assessment Criteria), Section 5 (Incorporation of 2020-2045 RTP/SCS Program EIR Mitigation Measures), and Section 6 (Sustainable Communities Environmental Analysis/Checklist) of this document, that preparation of a SCEA in accordance with PRC Section 21155.2(b) is appropriate for the Project for the following reasons:

- The Project is consistent with the general use designations, density, building intensity, and applicable policies specified for the area of the Project site in the 2020-2045 RTP/SCS prepared by SCAG, which is the metropolitan planning organization for the City.
- The State Air Resources Board, pursuant to subparagraph (H) of paragraph (2) of subdivision (b) of Section 65080 of the Government Code, has accepted SCAG's determination that the sustainable communities strategy adopted by SCAG in the 2020-2045 RTP/SCS would, if implemented, achieve the GHG emission reduction targets.
- The Project qualifies as a transit priority project pursuant PRC Section 21155 in that the Project contains more than 50 percent residential use; provides a minimum net density greater than 20 units

an acre; and is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan;

- The Project is a residential or mixed-use project as defined by PRC Section 21159.28(d);
- The Project incorporates all feasible and applicable mitigation measures, performance standards, or criteria set forth in the prior environmental reports and adopted findings made pursuant to PRC Section 21081, including the 2020-2045 RTP/SCS Program EIR;
- All potentially significant or significant effects required to be identified and analyzed pursuant to CEQA in an initial study have been identified and analyzed in an initial study; and
- As outlined in detail in Section 6, *Sustainable Communities Environmental Analysis/Checklist,* changes or alterations have been required in or incorporated into the Project that avoid or mitigate the significant effects to a level of less than significant.

1.6 Organization of the SCEA

Based on the information presented above, the SCEA for the Project is organized as follows:

- **Section 1. Introduction:** This section provides introductory information about the Project and background information regarding SB 375, lists the TPP criteria, and describes the required content of the SCEA.
- **Section 2. Environmental Setting:** This section provides information on the current uses and designations for the Project site and surrounding areas.
- **Section 3. Project Description:** This section provides a detailed description of the Project, including Project characteristics and required discretionary approvals.
- **Section 4. Sustainable Communities Environmental Assessment Criteria:** This section includes a discussion of the Project's consistency with the TPP criteria listed above and demonstrates that the Project satisfies all necessary criteria for approval of a SCEA as set forth in PRC Sections 21155.2 and 21159.28(a).
- **Section 5. Incorporation of 2020-2045 RTP/SCS Program EIR Mitigation Measures:** This section identifies all of the mitigation measures contained in the Mitigation Monitoring and Reporting Program (MMRP) for SCAG's 2020-2045 RTP/SCS Program EIR and a discussion of the applicability of the mitigation measures to the Project.
- **Section 6. Sustainable Communities Environmental Impact Analysis/ Initial Study Checklist:** This section contains the completed Initial Study Checklist and assesses the significance level under each environmental impact threshold. Each environmental issue identified in the Initial Study Checklist contains an assessment and discussion of Project-specific and cumulative impacts associated with each subject area. Where the evaluation identifies potentially significant effects, as identified in the Checklist, mitigation measures are provided to reduce such impacts to less than significant levels.

2 ENVIRONMENTAL SETTING

2.1 Project Location

The City of Redlands encompasses approximately 36 square miles of land within San Bernardino County and is bound by Loma Linda to the west; the unincorporated community of Mentone to the east; Highland to the north; and Riverside County and Moreno Valley to the south.

The Project site is located at the northwest corner of Eureka Street and Brookside Avenue in Downtown Redlands. As shown on Figure 2-1, *Regional Location,* regional access to the Project site is provided by I-10 to Orange Street. Local access to the site is provided by Eureka Street and Brookside Avenue, as shown on Figure 2-2, *Local Vicinity*.

2.2 Existing Project Site

The Project site encompasses approximately 3.03-acres and 17 parcels of land. The 17 Assessor's Parcel Numbers (APNs) of the Project site are listed in Table 2-1 below.

Table 2-1: Assessor's Parcel Numbers

0171-101-01	0171-211-12	0171-211-18
0171-101-02	0171-211-13	0171-211-19
0171-101-03	0171-211-14	0171-211-20
0171-101-04	0171-211-15	0171-211-21
0171-101-05	0171-211-16	0171-211-25
0171-211-11	0171-211-17	

Project site is currently vacant and undeveloped. The Project site was previously used as the City Hall Annex, which was recently demolished and has since been graded. The Project site's existing conditions are shown in Figure 2-3, *Project Aerial,* and Figures 2-4, *Existing Site Photos.*

2.3 Existing Land Uses and Zoning Designation of the Project Site

As shown on Figure 2-5, *Existing General Plan Designation,* the Project site has General Plan land use designation of Commercial, which allows commercial development. The entire Project site is within the Transit Village Overlay.

As shown on Figure 2-6, *Existing Zoning,* the entire Project site is zoned as General Commercial (C-3). As indicated in the City's Municipal Code, the General Commercial zoning district is intended to provide a central commercial location, accessible from all areas of the city and surrounding areas. Additionally, the C-3 zoning designation allows for residential uses combined with nonresidential uses in an existing building or entirely new building. The C-3 zone allows for development at up to a 4.0 FAR maximum and has no specified building height limit.

2.4 Surrounding General Plan and Zoning Designations

The Project site is located within a developed, mixed-use area within the City of Redlands as described below:

North: Immediately north of the Project site are commercial uses, designated as Commercial and zoned General Commercial (C-3). Areas directly to the north of the Project site are within the Transit Village Overlay.

South: Directly south of the southern portion of the Project site are multiple office buildings, residences, and the Redlands U.S. Post Office. Areas to the south of the Project site are designated as Commercial and Public/Institutional by the Redlands General Plan and zoned Administrative (A-P) followed by Transitional (T).

East: Directly to the east of the Project site is Eureka Street followed by the Redlands Mall. Areas to the east of the Project site are designated as Commercial and Public/Institutional by the Redlands General Plan, and zoned General Commercial (C-3) and Administrative (A-P).

West: Directly to the west of the Project site are commercial buildings and residences followed by Kendall Street. Areas to the west of the Project site are designated as Medium Density Residential and Commercial by the Redlands General Plan, and zoned Administrative (A-P) and Multi-Family Residential (R-2).

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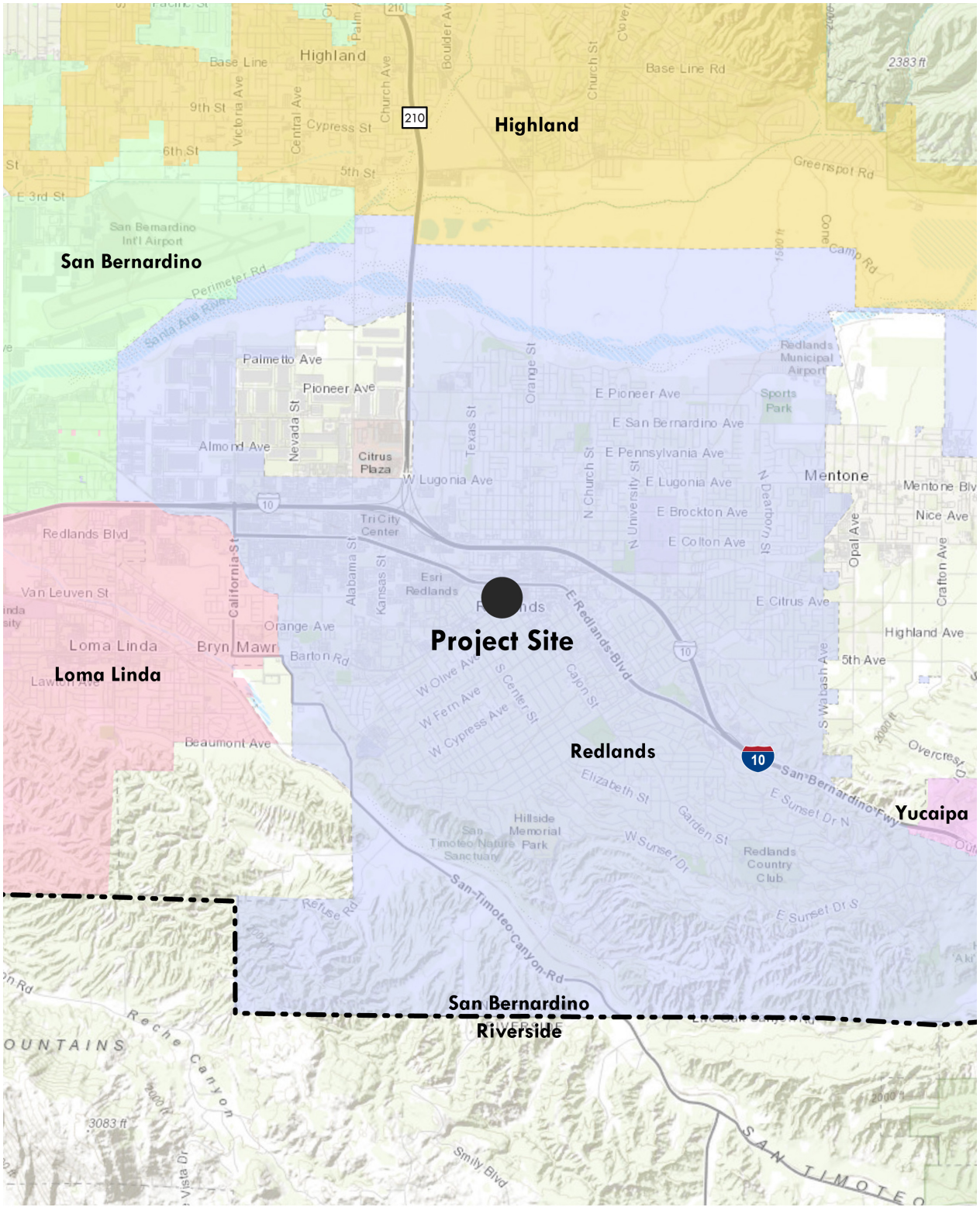
Regional Location



City Center
City of Redlands

Figure 2-1

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Local Vicinity



City Center
City of Redlands

Figure 2-2

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Aerial View



City Center
City of Redlands

Figure 2-3

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Existing Site Photos



View from northwest corner of site on Citrus Ave and 1st St.



View from northeast corner on Eureka St.

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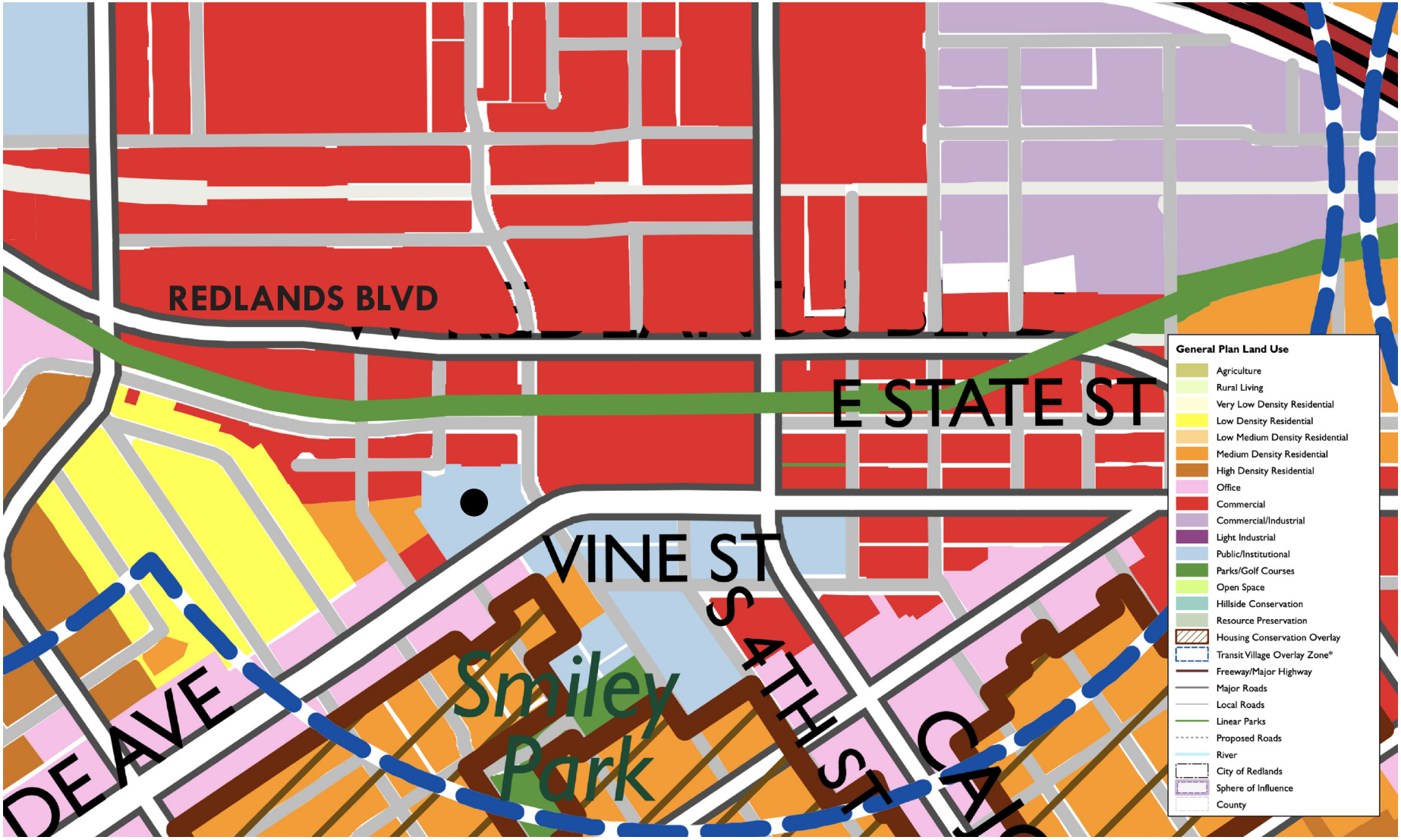
Existing General Plan Designation



Project Site

N

City Center
City of Redlands

Figure 2-5

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Existing Zoning



Project Site

N

City Center
City of Redlands

Figure 2-6

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3 PROJECT DESCRIPTION

3.1 Proposed Project

3.1.1 Project Overview

The Project proposes to construct a new mixed-use development consisting of multi-family residential units and restaurant uses. The Project would also develop a ground floor and subterranean parking garage located beneath the proposed residential building. The Project includes 131 multifamily dwelling units and 23,476 square feet (SF) of amenity space consisting of a 9,770 SF roof deck, a 7,380 SF pool plaza, a 5,356 SF spa plaza, and a 527 SF upper lounge. The Project also proposes 10,550 SF of restaurant space on the corner of Eureka Street and Brookside Avenue, as shown on Figure 3-1, *Conceptual Site Plan.*

3.1.2 Project Features

Architectural Design

The proposed apartment building would be 4-stories with a maximum height of 55 feet from grade. The proposed restaurant buildings would be 30 feet in height. As shown in Figure 3-6, Project elevations would include a variety of architectural elements, including articulated massing and finish material palates, and are designed to be compatible with the Downtown historic architectural styles within the city including Spanish Mission and 19th Century, and Mediterranean Style Contemporary.

Residential Units

The Project would construct approximately 131 multi-family residential units in one 4-story building for a density of 45.6 dwelling units per acre. The residential units would include studio, studio/den, one-bedroom, two-bedroom, and two-bedroom/den floor plans that range from approximately 517 SF to 1,252 SF. Residential unit breakdown for each building is provided in Table 3-1.

Table 3-1: Residential Unit Breakdown

Unit Type	Square Footage	Number of Units
Unit 1 (JR 1 Bed)	517	40
Unit 1D (JR 1 Bed/Den)	657	2
Unit 2 (1 Bed, 1 Bath)	585	28
Unit 2X (1 Bed, 1 Bath, Den)	655	16
Unit 2XD1 (1 Bed, 1 Bath)	774	15
Unit 3 (1 Bed, 1 Bath)	744	6
Unit 4 (1 Bed, 1 Bath)	835	5
Unit 5 (1 Bed, 1 Bath, Den)	862	10
Unit 6 (2 Bed, 2 Bath)	939	3
Unit 6X (2 Bed, 2 Bath)	1,133	2
Unit 6X+ (2 Bed, 2 Bath)	1,053	1
Unit 6X++ (2 Bed, 2 Bath, Den)	1,252	3
Total	---	**131**

The residential building would also include approximately 23,476 SF of amenity space, including a pool, lounge, rooftop bar, fitness room, shared kitchen, and game room. Additionally, the apartment building would include private interior courtyard areas, with an outdoor pool and spa, and a rooftop lounge, as shown on Figure 2-2, *Conceptual Site Plan, Unit Floor 1*.

Restaurant Space

The Project would develop approximately 10,550 SF of street-facing, ground floor restaurant space on the corner of Brookside Avenue and Eureka Street. The proposed restaurant space would be split into three separate pads. Restaurant Pad 1 is approximately 3,505 SF, Restaurant Pad 2 is approximately 3,450 SF, and Restaurant Pad 3 is approximately 3,578 SF. Restaurant parking would be provided through a surface lot adjacent to the proposed restaurants.

Circulation and Parking

The Project would be accessed via four proposed driveways: two along Brookside Avenue, one along Eureka Street, and one along West Citrus Avenue, as shown on Figures 3-1 through 3-5. The Project would also include 20-foot to 26-foot-wide access lanes throughout the site.

The Project proposes a single-level parking structure beneath the apartment building with approximately 100 covered parking spaces to serve future residents. Access to this parking structure would be provided the internal access lane to the north of the proposed residential building. In addition to the proposed parking structure, the Project also proposes a surface lot for with 112 spaces for restaurant employees, restaurant patrons, and guests.

Recreation and Open Space

The Project would provide approximately 23,476 SF of common recreational space. The common recreational space would include a 9,770 SF roof deck, 7,380 SF pool plaza, 5,356 SF spa plaza, and 527 SF upper lounge. Additionally, the Project would include approximately 12,532 SF of private open space. All 131 units would include balconies or terraces that range in size from 35 SF to 473 SF.

Landscaping

The Project would install new drought tolerant ornamental landscaping throughout the Project site, as shown on Figure 2-3, *Landscape Plan*, which would include trees, such as: king palms, orange trees, and birds of paradise. In addition, a variety of ornamental shrubs and groundcovers would be installed for a total of 17,303 SF of landscape area.

Fencing and Walls

The Project would include the installation of a 6-foot-high concrete wall on the western property lines and the installation of a guard rail on top of the existing retaining wall along a portion of the western property line. Additionally, the Project would include the installation of a 6-foot-high concrete wall on the northern property line.

Lighting

Lighting proposed as part of the Project would be typical of residential and commercial uses and would consist of primarily of wall mounted lighting, security lighting, as well as pole mounted lights along roadway and sidewalks. Additional accent lighting, such as string lighting, would be provided in outdoor community recreation areas. All of the Project's outdoor lighting would be directed downward or shielded to minimize offsite spill, as required by General Plan Action 2-A.35.

Easements

The Project would include a 25-foot public access easement through the center of the site. Additionally, a 15-foot public utility easement is proposed in the northwest portion of the site.

Infrastructure Improvements

Street Improvements

The proposed Project would dedicate 5 feet of right-of-way to Citrus Avenue and 4 feet of right-of-way to Eureka Street.

The Project would construct new 8-foot-wide sidewalks along Eureka Street. New curb and gutter are proposed along the northeast property line. A new curb is also proposed along a portion of the northwest property line.

Water

The Project would install new onsite potable water infrastructure that would connect to existing 12-inch domestic water lines in Brookside Avenue and Eureka Street. The Project would install an 8-inch dry non-potable water line in Brookside Avenue. The non-potable line would be connected in the future to provide irrigation. Additionally, the Project would install fire water lines onsite that would connect to the existing and proposed 12-inch domestic water lines in Brookside Avenue and Eureka Street.

Sewer

The Project would install two new 14-inch onsite sewer lines that would connect to the existing 14-inch sewer line in First Street and a new 14-inch sewer line in Eureka Street that would connect to the existing 8-inch sewer line in North Eureka Street. The Project also proposes to realign existing public and private sewer lines within the site.

Drainage

The Project would install new storm drain lines throughout the site and realign existing storm drain lines. Two corrugated metal pipe (CMP) underground storage systems are proposed: one in the northeastern portion of the Project site and the other in the northwestern portion of the Project site.

3.1.3 General Plan and Zoning

As shown on Figure 2-5, *Existing General Plan Designation,* the Project site has a designation of Commercial. The entire Project site is within the Transit Village Overlay. The Project would be consistent with the Commercial General Plan Designation.

As shown on Figure 2-6, *Existing Zoning,* the entire Project site is zoned as General Commercial (C-3). The C-3 zone allows for development at up to a 4.0 FAR maximum and has no specified building height limit. The Project would be consistent with the General Commercial zoning.

3.1.4 Construction and Phasing

Construction activities would include the following: (1) site preparation; (2) grading and excavation; (3) construction of drainage, utilities, and subgrade infrastructure; (4) building construction; and (5) paving and application of architectural coatings. The proposed excavation and grading of the Project site would result in export of 16,500 cubic yards of soil. Construction activities would be limited to the hours between 7:00 am to 6:00 pm, Monday through Saturday, excluding federal holidays, which would be consistent with the City's noise regulations (Municipal Code Chapter 8.06).

3.1.5 Discretionary Approvals, Permits, and Studies

The following discretionary approval, permits, and studies are anticipated to be necessary for implementation of the proposed Project:

- **Parcel Map** to combine the site's existing 17 parcels to allow the creation of two parcels upon which the to construct the commercial and residential portions of the Project.
- **Conditional Use Permit** to allow residential combined with nonresidential uses in the C-3 zoning district.
- **Street Vacation** to vacate a portion of excess right-of-way adjacent to the north side of the project at W. Citrus Avenue and First Street.
- **Minor Exception Permit** to allow deviations in Municipal Code requirements for proposed walls and fences to allow heights taller than six feet.

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Conceptual Site Plan, Parking Level 1



LEGEND:

UNIT 1 (JR 1 BED)	517 SQFT - 23'X23'
UNIT 1D (JR 1 BED/1BA/DEN)	657 SQFT - 35.66'X23'
UNIT 2 (1 BED/1BA)	585 SQFT - 26'X23'
UNIT 2X (1 BED/1BA)	655 SQFT - 29'X23'
UNIT 2XD1 (1 BED/1BA/DEN)	774 SQFT - 40'X23'
UNIT 3 (1 BED/1BA)	744 SQFT - 23.33'X33'
UNIT 4 (1 BED/1BA)	835 SQFT - 41.66'X23'
UNIT 5 (1 BED/1BA/DEN)	862 SQFT - 38'X23'
UNIT 6 (2 BED/2BA)	939 SQFT - 44'X23'
UNIT 6X (2 BED/2BA)	1133 SQFT - 49.83'X23'
UNIT 6X+ (2 BED/2BA)	1053 SQFT - 44'X29'
UNIT 6X++ (2 BED/2BA/DEN)	1252 SQFT - 45'X36.33'
STAIRS/ELEVATORS	
COMMUNITY ROOM	
CORRIDOR	
MECHANICAL/STORAGE	
RESTAURANT SPACE	
BOUNDARY OF RETAIL PARCEL	

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Conceptual Site Plan, Unit Floor 1



LEGEND:

UNIT 1 (JR 1 BED)	517 SQFT - 23'X23'
UNIT 1D (JR 1 BED/1BA/DEN)	657 SQFT - 35.66'X23'
UNIT 2 (1 BED/1BA)	585 SQFT - 26'X23'
UNIT 2X (1 BED/1BA)	655 SQFT - 29'X23'
UNIT 2XD1 (1 BED/1BA/DEN)	774 SQFT - 40'X23'
UNIT 3 (1 BED/1BA)	744 SQFT - 23.33'X33'
UNIT 4 (1 BED/1BA)	835 SQFT - 41.66'X23'
UNIT 5 (1 BED/1BA/DEN)	862 SQFT - 38'X23'
UNIT 6 (2 BED/2BA)	939 SQFT - 44'X23'
UNIT 6X (2 BED/2BA)	1133 SQFT - 49.83'X23'
UNIT 6X+ (2 BED/2BA)	1053 SQFT - 44'X29'
UNIT 6X++ (2 BED/2BA/DEN)	1252 SQFT - 45'X36.33'
STAIRS/ELEVATORS	
COMMUNITY ROOM	
CORRIDOR	
MECHANICAL/STORAGE	
RESTAURANT SPACE	
BOUNDARY OF RETAIL PARCEL	

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Conceptual Site Plan, Unit Floor 2



LEGEND:

UNIT 1 (JR 1 BED)	517 SQFT - 23'X23'
UNIT 1D (JR 1 BED/1BA/DEN)	657 SQFT - 35.66'X23'
UNIT 2 (1 BED/1BA)	585 SQFT - 26'X23'
UNIT 2X (1 BED/1BA)	655 SQFT - 29'X23'
UNIT 2XD1 (1 BED/1BA/DEN)	774 SQFT - 40'X23'
UNIT 3 (1 BED/1BA)	744 SQFT - 23.33'X33'
UNIT 4 (1 BED/1BA)	835 SQFT - 41.66'X23'
UNIT 5 (1 BED/1BA/DEN)	862 SQFT - 38'X23'
UNIT 6 (2 BED/2BA)	939 SQFT - 44'X23'
UNIT 6X (2 BED/2BA)	1133 SQFT - 49.83'X23'
UNIT 6X+ (2 BED/2BA)	1053 SQFT - 44'X29'
UNIT 6X++ (2 BED/2BA/DEN)	1252 SQFT - 45'X36.33'
STAIRS/ELEVATORS	
COMMUNITY ROOM	
CORRIDOR	
MECHANICAL/STORAGE	
RESTAURANT SPACE	
BOUNDARY OF RETAIL PARCEL	

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Conceptual Site Plan, Unit Floor 3



LEGEND:

UNIT 1 (JR 1 BED)	517 SQFT - 23'X23'
UNIT 1D (JR 1 BED/1BA/DEN)	657 SQFT - 35.66'X23'
UNIT 2 (1 BED/1BA)	585 SQFT - 26'X23'
UNIT 2X (1 BED/1BA)	655 SQFT - 29'X23'
UNIT 2XD1 (1 BED/1BA/DEN)	774 SQFT - 40'X23'
UNIT 3 (1 BED/1BA)	744 SQFT - 23.33'X33'
UNIT 4 (1 BED/1BA)	835 SQFT - 41.66'X23'
UNIT 5 (1 BED/1BA/DEN)	862 SQFT - 38'X23'
UNIT 6 (2 BED/2BA)	939 SQFT - 44'X23'
UNIT 6X (2 BED/2BA)	1133 SQFT - 49.83'X23'
UNIT 6X+ (2 BED/2BA)	1053 SQFT - 44'X29'
UNIT 6X++ (2 BED/2BA/DEN)	1252 SQFT - 45'X36.33'
STAIRS/ELEVATORS	
COMMUNITY ROOM	
CORRIDOR	
MECHANICAL/STORAGE	
RESTAURANT SPACE	
BOUNDARY OF RETAIL PARCEL	



City Center
City of Redlands

Figure 3-4

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Conceptual Site Plan, Unit Floor 4



LEGEND:

UNIT 1 (JR 1 BED)	517 SQFT - 23'X23'
UNIT 1D (JR 1 BED/1BA/DEN)	657 SQFT - 35.66'X23'
UNIT 2 (1 BED/1BA)	585 SQFT - 26'X23'
UNIT 2X (1 BED/1BA)	655 SQFT - 29'X23'
UNIT 2XD1 (1 BED/1BA/DEN)	774 SQFT - 40'X23'
UNIT 3 (1 BED/1BA)	744 SQFT - 23.33'X33'
UNIT 4 (1 BED/1BA)	835 SQFT - 41.66'X23'
UNIT 5 (1 BED/1BA/DEN)	862 SQFT - 38'X23'
UNIT 6 (2 BED/2BA)	939 SQFT - 44'X23'
UNIT 6X (2 BED/2BA)	1133 SQFT - 49.83'X23'
UNIT 6X+ (2 BED/2BA)	1053 SQFT - 44'X29'
UNIT 6X++ (2 BED/2BA/DEN)	1252 SQFT - 45'X36.33'
STAIRS/ELEVATORS	
COMMUNITY ROOM	
CORRIDOR	
MECHANICAL/STORAGE	
RESTAURANT SPACE	
BOUNDARY OF RETAIL PARCEL	

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Elevations


ELEVATION KEY
±45'-7" (FROM GRADE)
±54'-11" (FROM GRADE)
±55' (FROM GRADE)
±48'-10" (FROM GRADE)
±49'-8" (FROM GRADE)
±30'
RESTAURANT
FRONT ELEVATION
(FACING BROOKSIDE AVENUE)


ELEVATION KEY
±48'-10" (FROM GRADE)
±55' (FROM GRADE)
±54'-8" (FROM GRADE)
±55' (FROM GRADE)
±53' (FROM GRADE)
RIGHT ELEVATION 1
(FACING PARKING LOT/NORTH EUREKA STREET BEYOND)

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4 SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT CRITERIA

4.1 Senate Bill 375

The State of California adopted SB 375, the Sustainable Communities and Climate Protection Act of 2008 to outline growth strategies and better integrate regional land use and transportation planning, which will help the State meet its GHG reduction mandates. SB 375 requires that the State's 18 metropolitan planning organizations incorporate a "sustainable communities strategy" with their respective regional transportation plans to achieve their respective region's GHG emissions reduction targets set by CARB. SCAG is the metropolitan planning organization that has jurisdiction over the Project site.

For the SCAG region, pursuant to SB 375, CARB set GHG emissions reduction targets that were updated in 2018 to a 19 percent reduction by 2035 in per capita passenger vehicle GHG emissions.

On September 3, 2020, SCAG adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS): Connect SoCal. The 2020-2045 RTP/SCS outlines strategies that meet or exceed these targets set by CARB. On October 30, 2020, pursuant to California Government Code Section 65080(b)(2)(J)(ii) and via Executive Order G-20-239, CARB accepted SCAG's determination that its 2020-2045 RTP/SCS would, if implemented, achieve CARB's GHG reduction targets. In addition to the GHG reduction targets set by CARB, the 2020-2045 RTP/SCS includes strategies for accommodating projected population, housing, and employment growth in the region. As a Land Use Tool, the 2020-2045 RTP/SCS identifies Priority Growth Areas (PGAs) throughout the SCAG region where 2020-2045 RTP/SCS strategies can be fully realized. These PGAs include Job Centers, transit priority areas (TPAs), High Quality Transit Areas (HQTAs), Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence. These PGAs account for only 4 percent of region's total land area, but implementation of SCAG's growth strategies will help these areas accommodate an estimated 64 percent of forecasted household growth and 74 percent of forecasted employment growth between 2016 and 2045.

4.2 Transit Priority Project Criteria

SB 375 provides CEQA streamlining benefits to transit priority projects (TPPs). A TPP is a project that meets the following four criteria (PRC Section 21155(a) and (b)):

1. Is consistent with the use designation, density, building intensity, and applicable policies specified for the project area in SCAG's 2020-2045 RTP/SCS;
2. Contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 and 50 percent nonresidential uses, a floor area ratio of no less than 0.75;
3. Provides a minimum net density of at least 20 units per acre; and
4. Is located within one-half mile of a major transit stop or high-quality transit corridor included in the 2020-2045 RTP/SCS.

4.2.1 Consistency with Criterion 1: Project uses designation, density, building intensity, and applicable policies specified for the Project Area in SCAG's 2020-2045 RTP/SCS.

Use Designation, Density, and Building Intensity

As discussed above, for the SCAG region, CARB has set GHG emission reduction targets to 19 percent below 2005 per capita emission levels by 2035. The 2020-2045 RTP/SCS outlines strategies that meet or exceed these targets set by CARB and balances Southern California's regional future mobility and housing needs with economic, environmental, and public health goals. On October 3, 2020, CARB accepted SCAG's quantification of GHG emission reductions from the 2020-2045 RTP/SCS and its determination that the 2020-2045 RTP/SCS would, if implemented, achieve the 2035 GHG emission reduction targets established by CARB.

For the reasons stated below, the Project is consistent with the land use designation, density, and building intensity of the 2020-2045 RTP/SCS.

Land Use Designation

The proposed Project would be consistent with the land use patterns promoted by the Connect SoCal Forecasted Regional Development Pattern. The Project site, which is within one-half mile from a planning major transit stop, is in an area that is considered by SCAG as a Priority Growth Area. The Project site is in an area that is considered a Priority Growth Area as it is in a 2045 HQTA, Neighborhood Mobility Area, and inside job centers. Furthermore, the Project would not be located in any absolutely constrained areas such as on agricultural land, open space, or on tribal lands.

The Project proposes to construct a new mixed-use development consisting of multi-family residential units and restaurant uses. The Project would also develop a ground floor parking garage located beneath the proposed residential building. The Project includes 131 multifamily dwelling units and 23,476 SF of amenity space consisting of a 9,770 SF roof deck, a 7,380 SF Pool Plaza, a 5,356 SF Spa Plaza, and a 527 SF Upper Lounge. The Project also proposes 10,550 SF of restaurant space on the corner of Eureka Street and Brookside Avenue.

Density/Building Intensity

The Project site is located within an urbanized area within the City of Redlands, in the Downtown Redlands area. The Project is an infill, mixed-use Project that proposes a residential density of approximately 45.6 dwelling units per acre. The 2020-2045 RTP/SCS identifies the HQTAs as appropriate for including high-density development, supporting pedestrian and bike infrastructure, reducing parking requirements, and retaining affordable housing near transit.

The Project site is located within a HQTA, as defined by SCAG, and a Transit Priority Area (TPA), as defined by SB 743, which supports transit opportunities and promotes a walkable environment. The Project site is well served by public transit, including the San Bernardino County Transit Authority's Arrow Line Downtown Station; and the Project's location along a mixed-use corridor and proposed onsite commercial and residential uses would encourage the use of transit, walking, and bicycling. Consistent with land within a HQTA, the Project would provide mixed-use development, including housing, on an infill, vacant site.

The proposed Project promotes pedestrian activity and bicycling activity by providing landscaping along the public right-of-way, outdoor open space, and walking paths. The proposed Project is similar to other developments within a HQTA in other jurisdictions.

Applicable Policies

The Project is consistent with applicable goals and policies presented within SCAG's 2020-2045 RTP/SCS, as shown by the consistency analysis presented in Table 4-1.

Table 4-1. Consistency Analysis with the 2020-2045 RTP/SCS Policies

Goals and Policies	Consistency Assessment
Connect SoCal Goals	
Goal 1: Encourage regional economic prosperity and global competitiveness.	**Not Applicable.** This Goal is directed at SCAG and the City of Redlands and does not apply to the proposed Project. This strategy calls on encouraging regional economic prosperity and global competitiveness. The proposed Project would not interfere with such policymaking.
Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods.	**Consistent.** The Project site is located in an urbanized are within the City of Redlands. The Project proposes to construct a new mixed-use development consisting of multi-family residential

	units and restaurant uses. The Project would also develop a ground floor parking garage located beneath the proposed residential building. The Project includes 131 multifamily dwelling units and 23,476 square feet (SF) of amenity space consisting of a 9,770 SF roof deck, a 7,380 SF pool plaza, a 5,356 SF spa plaza, and a 527 SF upper lounge. The Project also proposes 10,550 SF of restaurant space on the corner of Eureka Street and Brookside Avenue in a HQTA and TPA. The Project site is located less than one-quarter mile from the Arrow Line Rail Station in Downtown Redlands, which is currently under construction. The proposed Project would provide residents, employees, and visitors with convenient access to public transit and opportunities for biking and walking. The location of the Project encourages a variety of transportation options and access and is therefore consistent with this Goal.
Goal 3: Enhance the preservation, security, and resilience of the regional transportation system.	**Consistent**. The Project would improve public safety infrastructure near the Project site by providing new lighting within the Project site and around the perimeter, including new building identification lighting, commercial accent lighting, wayfinding, balcony lighting, and security lighting. Pedestrian areas would include pathways and entryways into the Project would be well lit for security. Pedestrian access to the site would be distinct from vehicle driveways and the Project would not mix pedestrian and automobile traffic to ensure pedestrian safety. The Project would be subject to Site Plan review to ensure vehicle and pedestrian safety throughout the Project.
Goal 4: Increase person and goods movement and travel choices within the transportation system.	**Not Applicable.** This strategy calls on SCAG to increase person and goods movement and travel choices across the transportation system. The proposed Project would not interfere with this goal.
Goal 5: Reduce greenhouse gas emissions and improve air quality.	**Consistent.** The Project would result in criteria air pollutant and GHG emissions during construction and operation. However, emissions would not exceed the SCAQMD significance thresholds and would be consistent with the City's Climate Action Plan.
Goal 6: Support healthy and equitable communities.	**Consistent.** The Project would be consistent with this Goal by facilitating the use of alternative modes of transportation, which would aid in reducing car trips and positively impact air quality. The Project includes bicycle parking spaces and bicycle storage rooms for the

	residential and commercial uses within the Project. The project would encourage pedestrian travel by incorporating new residential and commercial uses onsite within a mixed-use development as well as locating the Project in an urban area surrounding by a diverse mix of land uses. Additionally, the Project would provide a mix of housing units in order to encourage equitable access to transit.
Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**Not Applicable.** This goal is directed towards SCAG and does not apply to individual development projects. The proposed Project would be located in proximity to public transit opportunities.
Goal 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	**Not Applicable.** This Goal is directed towards SCAG and does not apply to the proposed Project. This strategy calls on SCAG to use new transportation technologies and data-driven solutions to increase efficiency. The proposed Project would not interfere with this goal.
Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.	**Consistent.** The proposed project would construct approximately 131 apartment units and condos which would include studios, one-bedrooms, and two-bedrooms. The proposed Project would be within one-quarter mile of the Downtown Redlands Arrow Line Station and within feet of multiple bus line stops.
Goal 10: Promote conservation of natural and agricultural lands and restoration of habitats.	**Consistent.** The proposed Project site is currently vacant but was previously developed with public/institutional uses. As such, the Project site is fully disturbed. Therefore, the Project would not encroach on agricultural lands or protected habitats. As such, the Project would not interfere with this goal.
Connect SoCal Strategies	
Strategy 1: Focus growth near destinations and mobility options.	**Consistent.** The proposed Project site is located in a HQTA, a TPA, neighborhood mobility area, and near job centers, as defined by SCAG. The site is located less than 0.5-mile from the Arrow Line Station in Downtown Redlands, which is slated for completion by 2022. Additionally, there are multiple bus lines with stops adjacent to the proposed Project.
Strategy 2: Promote diverse housing choices.	**Consistent.** The proposed Project would develop 131 apartment units which would include studios, one-bedrooms, and two-bedrooms in order to provide a diverse amount of housing choices.
Strategy 3: Leverage technology innovations.	**Not Applicable.** This strategy is directed to SCAG and jurisdictions and does not apply to the

	proposed Project. This strategy aims to promote low emission technologies, improve access to services through technology, and identify ways to incorporate micro power grids into communities. The proposed Project would not interfere with this strategy.
Strategy 4: Support implementation of sustainability policies.	**Consistent.** The proposed Project would incorporate Green Building Measures, including water efficient landscaping, efficient lighting, low-flush toilets, and energy efficient appliances.
Strategy 5: Promote a Green Region.	**Consistent.** The proposed Project would include open space areas and walkways. Additionally, the development would emphasize sustainability features that promote more resource efficient development. The Project site is also located within 0.5-mile from the Arrow Line Station at Downtown Redlands.

4.2.2 Consistency with Criterion 2: Based on total building square footage, the Project contains at least 50 percent residential use, and if the Project contains between 26 and 50 percent nonresidential uses, a floor area of not less than 0.75.

Criterion 2A: Project contains at least 50 percent residential use

Based on the total building square footage, the Project contains at least 50 percent residential use. Table 4-2 shows the proposed land uses, dwelling units, total square feet, and percentage of use for the site. The Project would include 134,616 SF of residential use (including residential amenities) and 10,550 SF of restaurant space.

Table 4-2. Proposed Land Use

Land Use	Units/Square Feet	Percentage of Use
Residential & Residential Amenity	131 units, 134,616 SF	92.7%
Commercial/Restaurant	10,550 SF	7.3%
Total Floor Area	**145,166 SF**	**100%**

As shown on Table 4-2, overall, the Project includes a total floor area of approximately 134,616 square feet with approximately 92.7 percent dedicated to residential uses. Residential uses would include approximately 110,648 SF of unit floor area and up to 131 dwelling units, including studios, one-bedrooms, and two-bedrooms.

New commercial space with restaurant uses would be approximately 7.3 percent of uses, as 10,550 SF of commercial uses would be developed.

Criterion 2B: Project would have a density of at least 20 units per acre.

The Project includes a minimum net density of at least 20 units per acre. The Project site consists of 17 parcels that combine for a total of approximately 3.03-acres. Therefore, the Project would provide up to 131 residential units for a density of approximately 45.6 du/acre. Accordingly, the Project would exceed the required net density of at least 20 dwelling units per acre. Therefore, the Project would be consistent with Criterion 2B.

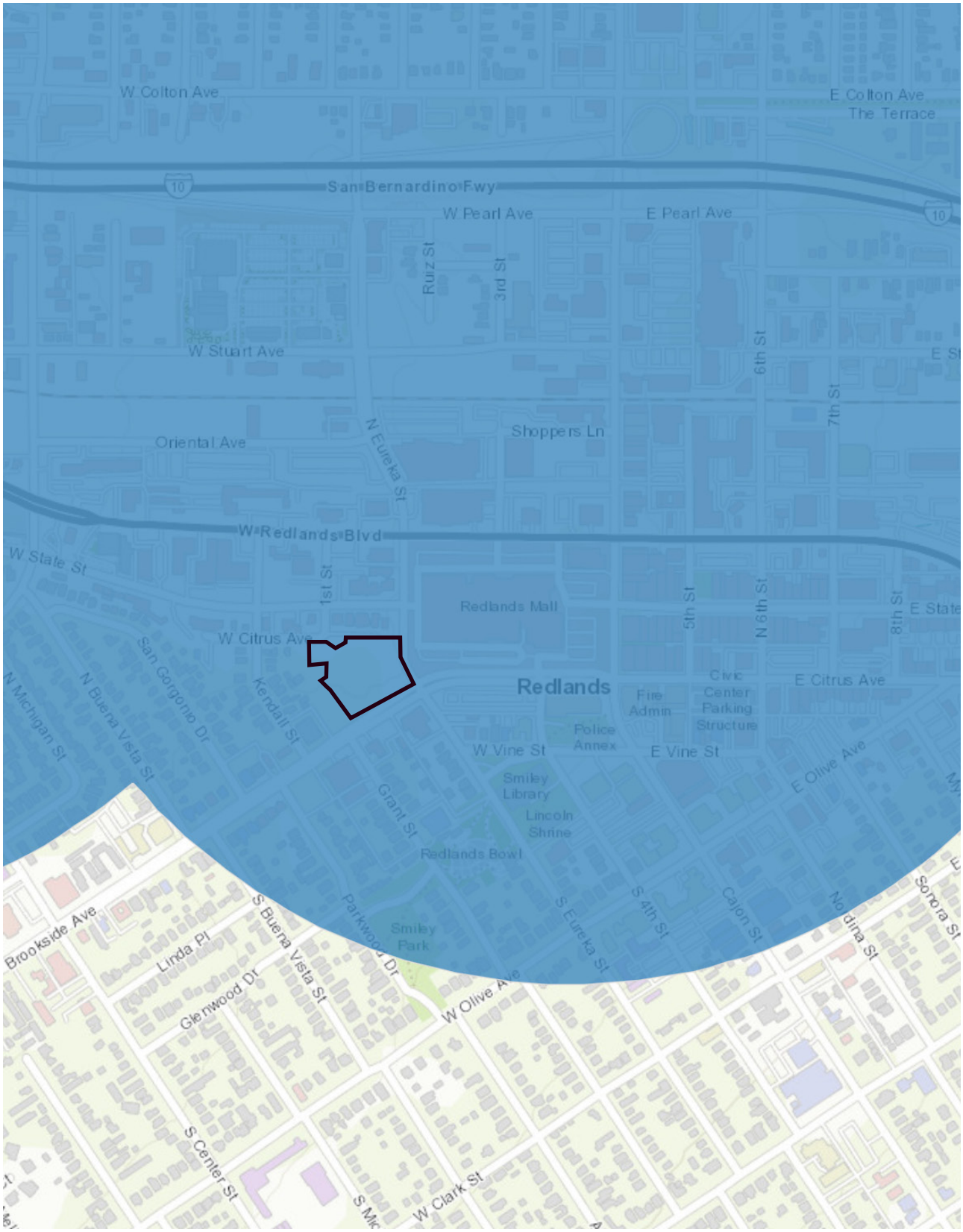
Criterion 2C: The Project is located within one-half mile of a major transit stop or high-quality transit corridor included in the 2020-2045 RTP/SCS.

The Project site is located within one-half mile of either a major transit stop that contains an existing rail station, a ferry terminal served by transit, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during peak commute periods; or a high-quality transit corridor that has fixed route bus service with service intervals no longer than 15 minutes during peak commute hours, as shown on Figure 4-1, *Transit Priority Areas*.

A major transit stop is defined as a "site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods" and is included in the applicable regional transportation plan (PRC Sections 21064.3 and 21155(b)). A high-quality transit corridor is a "corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours" (PRC Section 21155(b)).

The Project site is 0.26-mile south of the Arrow Line Station in Downtown Redlands. The Arrow Line provides a connection to the University of Redlands, ESRI campus, and San Bernardino. While the Arrow Line is still under construction, station would be complete prior to buildout of the proposed Project. As such, the Project is located within 0.5-mile of a major transit stop and would be consistent with Criterion 2C.

Transit Priority Areas



Project Site

Transit Priority Areas

City Center
City of Redlands

Figure 4-1

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5 INCORPORATION OF 2020-2045 RTP/SCS PROGRAM EIR MITIGATION MEASURES

5.1 Incorporation of Feasible Mitigation Measures, Performance Standards, and Criteria from Prior Applicable EIRs

Public Resources Code (PRC) Sections 21155.2 and 21159.28(a) require that a TPP incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs, which for the Project would include the 2020-2045 RTP/SCS Program Environmental Impact Report for Southern California Association of Governments, which was certified May 7, 2020 (RTP/SCS PEIR). It is the intent of SCAG that lead agencies and others use the information contained within the PEIR in order to "tier" subsequent environmental documentation of projects in the region.

The Mitigation Monitoring and Reporting Program for the RTP/SCS PEIR (SCAG MMRP) does not include project level mitigation measures that are required to be incorporated into the Project. However, the SCAG MMRP does provide a list of mitigation measures that SCAG determined a lead agency can and should consider, as applicable and feasible, where the lead agency has concluded that a project has the potential to result in significant effects. The City of Redlands has complied with PRC Section 21155.2 and 21159.28.

The RTP/SCS PEIR serves as an informational document to inform decision-makers and the public of the potential environmental consequences of approving the proposed RTP/SCS. The RTP/SCS PEIR includes mitigation measures designed to help avoid or minimize significant environmental impacts. The RTP/SCS PEIR serves as a first-tier document for later CEQA review of individual projects included in the program.

The City has reviewed all mitigation measures contained in the RTP/SCS PEIR (and determined their applicability) to the Project. For each such mitigation measure, the City considered whether to use the RTP/SCS PEIR mitigation measure or an equally effective City mitigation measure or federal, State, regional, or City regulation. The City's applicability determination is found in Table 5-1, Project Consistency with 2020-2045 RTP/SCS Mitigation Measures. As indicated in Table 5-1, the City has incorporated an equally or more effective Project-specific mitigation measure or federal, State, regional, or City regulation, or has for other reasons determined that incorporation of the SCAG 2020 RTP/SCS MMRP mitigations measures is not required.

Table 5-1. Project Consistency with 2020-2045 RTP/SCS PEIR Mitigation Measures

Topic	2020-2045 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to the Project
Aesthetics		
Impact AES-1: Potential for the Project to have a substantial adverse effect on a scenic vista. **Impact AES-2:** Potential to substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.	**PMM AES-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts to scenic vistas, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development. b) Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile. c) Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas. d) Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements. e) Retain or replace trees bordering highways, so that clear-cutting is not evident. f) Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas. g) Reduce the visibility of construction staging areas by fencing and screening these areas with low contrast materials consistent with the surrounding environment, and by revegetating graded slopes and exposed earth surfaces at the earliest opportunity; h) Use see-through safety barrier designs (e.g., railings rather than walls)	No mitigation is required. PRC Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site or within a transit priority area shall not be considered significant impacts on the environment." As such, the Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. Further provisions of SB 743 provide that this legislation "does not affect, change, or modify the authority of a lead agency to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers provided by other laws or policies" (PRC Section 21099(d)(2)(A)), and that "aesthetic impacts do not include impacts on historical or cultural resources" (Section 21099(d)(2)(B)).
Impact AES-3: Potential to substantially degrade the existing visual character or quality of public views (public views are those that are experienced from publicly accessible vantage points). In an urbanized area, would the Project conflict with applicable zoning and	**PMM AES-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds,	No mitigation is required. PRC Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site or within a transit priority area shall not be considered significant impacts on the environment." As such, the Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099.

Topic	2020-2045 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to the Project
other regulations governing scenic quality.	and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable. b) Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors. c) Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible, or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria. d) Design projects consistent with design guidelines of applicable general plans. e) Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape. f) Where sound walls are proposed, require sound wall construction and design methods that account for visual impacts as follows: • use transparent panels to preserve views where sound walls would block views from residences; • use landscaped earth berm or a combination wall and berm to minimize the apparent sound wall height; • construct sound walls of materials whose color and texture complements the surrounding landscape and development; g) Design sound walls to increase visual interest, reduce apparent height, and be visually compatible with the surrounding area; and landscape the sound walls with plants that screen the sound wall, preferably with either native vegetation or landscaping that complements the dominant landscaping of surrounding areas.	Further provisions of SB 743 provide that this legislation "does not affect, change, or modify the authority of a lead agency to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers provided by other laws or policies" (PRC Section 21099(d)(2)(A)), and that "aesthetic impacts do not include impacts on historical or cultural resources" (Section 21099(d)(2)(B)).
Impact AES-4: Create a new source of substantial light or glare which would adversely effect day or nighttime views in the area.	**PMM AES-3:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties.	No mitigation is required. PRC Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site or within a transit priority area shall not be considered significant impacts on the environment." As such, the Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099.

Topic	2020-2045 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to the Project
	b) Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m. c) Use high-pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting. d) Use unidirectional lighting to avoid light trespass onto adjacent properties. e) Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses. f) Provide structural and/or vegetative screening from light-sensitive uses. g) Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses. h) Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces. i) Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.	The proposed Project would be subject to City of Redlands General Plan Action 2-A.35 that requires shielding of light to minimize lighting of adjacent off-site areas and generation of glare.
Agricultural Resources		
Impact AG-1: Potential for the Project to 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 nonagricultural use.	**PMM AG-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential adverse effects on agricultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Require project sponsors to mitigate for loss of farmland by providing permanent protection of in-kind farmland in the form of easements, fees, or elimination of development rights/potential. b) Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance. c) Maintain and expand agricultural land protections such as urban growth boundaries. d) Provide for mitigation fees to support a mitigation bank that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands. e) Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access.	No mitigation is required. The Project site is currently fully disturbed, and was previously developed with public institutional uses, and is located in an urbanized setting. There is no farmland or agricultural activity on the Project site or in the vicinity of the Project.

Topic	2020-2045 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to the Project
	f) Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.	
Impact AG-2: Potential for the Project to conflict with existing zoning for agricultural use, or a Williamson Act Contract.	**PMM AG-2:** Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects on Williamson Act contracts to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Project relocation or corridor realignment to avoid lands in Williamson Act contracts. b) Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection.	No mitigation is required. The Project site is not currently zoned for agricultural production, the site was previously developed with public/institutional uses and is currently vacant, there is no farmland onsite, and there are no Williamson Act Contracts in effect for the Project site.
Impact AG-3: Potential for the Project to 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)). **Impact AG-4:** Potential for the Project to result in the loss of forest land or conversion of forest land to non-forest use.	**PMM AG-3:** Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland to maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Minimize construction related impacts to agricultural and forestry resources by locating materials and stationary equipment in such a way as to prevent conflict with agriculture and forestry resources	No mitigation is required. The Project site is currently vacant but was previously fully developed with urban uses, not forest use. Therefore, no forest land will be lost or converted to non-forest uses.
Impact AG-5: Potential for the Project to involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to	See **PMM AG-2** and **PMM GHG-2.** **PMM AG-4:** Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent	No mitigation is required. The Project site is vacant but was previously fully developed with urban uses and is not used for any agricultural uses or forest land. Additionally, the Project site is in an urbanized area and there are no agricultural or forest uses within the Project vicinity. Therefore, no agricultural

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non-agricultural use or conversion of forest land to non-forest use.	practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued agricultural land. b) Redesign project features to minimize fragmenting or isolating Farmland. Where a project involves acquiring land or easements, ensure that the remaining non-project area is of a size sufficient to allow economically viable farming operations. The project proponents shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management. c) Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other infrastructure, the project proponents shall be responsible for restoring access as necessary to ensure that economically viable farming operations are not interrupted. **PMM AG-5:** Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.	or forest land will be converted with implementation of the Project.
Air Quality		
Impact AQ-1: Conflict with or obstruct implementation of the applicable air quality plan.	No mitigation is required.	No mitigation is required.
Impact AQ-2: Potential to violate any air quality standard or	**PMM-AQ-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can	The Project's impacts with respect to air quality standards are less than significant. Pursuant to CEQA Guidelines Section

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contribute substantially to an existing or projected air quality violation. **Impact AQ-3:** 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. **Impact AQ-4:** Expose sensitive receptors to substantial pollutant concentrations.	and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Minimize land disturbance. b) Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes. c) Cover trucks when hauling dirt. d) Stabilize the surface of dirt piles if not removed immediately. e) Limit vehicular paths on unpaved surfaces and stabilize any temporary roads. f) Minimize unnecessary vehicular and machinery activities. g) Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. h) Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities. i) On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18- Dust Palliative shall be incorporated into project specifications. j) Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet. Daily logging of the operating hours of the equipment should also be required. k) Ensure that all construction equipment is properly tuned and maintained. l) Minimize idling time to 5 minutes or beyond regulatory requirements —saves fuel and reduces emissions. m) Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. n) Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators.	15126.4, subd. (a)(4)(A)–(B), there must be a nexus between PMM AQ-1 and environmental impacts from the proposed Project. However, the Project would nevertheless substantially conform to this mitigation measure as set forth in the 2020-2045 RTP/SCS, as it consists of existing regulatory compliance measures set by CARB and the South Coast Air Quality Management District (SCAQMD). • CARB Anti-Idling Air Toxics Control Measure: This measure, codified in Title 13 California Code of Regulations (CCR) Section 2485, applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given time, with certain exception for vehicles where idling is a necessary performance activity such as for concrete trucks. • SCAQMD Rule 401 – Visible Emissions: This rule states that a person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or of such opacity as to obscure an observer's view. • SCAQMD Rule 402 – Nuisance: This rule states that 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. • SCAQMD Rule 403 – Fugitive Dust: This rule requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM10 emissions to less than 50 micrograms per

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	o) Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. p) As appropriate require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site. q) Require projects to use Tier 4 Final equipment or better for all engines above 50 horsepower (hp). In the event that construction equipment cannot meet to Tier 4 Final engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by SCAG before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should make available for inspection and remain on-site for a period of at least two years from completion of construction, unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds. Project sponsors should also consider including ZE/ZNE technologies where appropriate and feasible. r. Projects located within the South Coast Air Basin should consider applying for South Coast AQMD "SOON" funds which provides funds to applicable fleets for the purchase of commercially available .low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. s. Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for additional mitigation that can be applied to individual projects. t. Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community Partnerships	cubic meter (µg/m3) and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule). Dust control measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers and/or ceasing all activities. • SCAQMD Rule 1113 – Architectural Coatings: This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories. • SCAQMD Rule 1186 – PM10 Emissions from Paved and Unpaved Roads, and Livestock Operations: This rule applies to owners and operators of paved and unpaved roads and livestock operations. The rule is intended to reduce PM10 emissions by requiring the cleanup of material deposited onto paved roads, use of certified street sweeping equipment, and treatment of high-use unpaved roads (see also SCAQMD Rule 403). • The Project will comply with South Coast Air Quality Management District Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, which sets requirements to control the emission of VOC from excavating, grading, handling and treating VOC-contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition. • The Project will install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138. • In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines will meet specified fuel and fuel additive requirements and emission standards.

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	(EJCP), Clean Air Ranger Education (CARE), and Why Air Quality Matters programs. u. Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors). v. As applicable for airport projects, the following measures should be considered: – Considering operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxing, if feasible as allowed per Federal Aviation Administration guidelines. – Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project. – Require the use of ground service equipment (GSE) that can operate on battery-power. If electric equipment cannot be obtained, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4, at a minimum. w. As applicable for port projects, the following measures should be considered: – Develop specific timelines for transitioning to zero emission cargo handling equipment (CHE). – Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress. – Use short side electric power for ships, which may include tugboats and other ocean-going vessels or develop incentives to gradually ramp up the usage of shore power. – Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized. – Maximize participation in the Port of Los Angeles' Vessel Speed Reduction Program or the Port of Long Beach's Green Flag Initiation Program in order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin. – Encourage the participation in the Green Ship Incentives. – Offer incentives to encourage the use of on-dock rail.	• Nitrogen oxide emissions shall be minimized through the use of emission control measures (e.g., use of best available control technology for new combustion sources such as boilers and water heaters) as required by South Coast Air Quality Management District Regulation XIII, New Source Review. With implementation of CARB and SCAQMD rules, the Project would minimize construction emissions and would therefore be substantially in conformance with SCAG PMM AIR-1.

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	x. As applicable for rail projects, the following measures should be considered: – Provide the highest incentives for electric locomotives and then locomotives that meet Tier 5 emission standards with a floor on the incentives for locomotives that meet Tier 4 emission standards. y. Projects that will introduce sensitive receptors within 500 feet of freeways and other sources should consider installing high efficiency of enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit. z. Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters. – Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open or residents are outside. – Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued. – Disclose the potential increase in energy costs for running the HVAC system to prospective residents. – Provide information to residents on where MERV filters can be purchased. – Provide recommended schedule (e.g., every year or every six months) for replacing the enhanced filtration units. – Identify the responsible entity such as future residents themselves, Homeowner's Association, or property managers for ensuring enhanced filtration units are replaced on time. – Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units. – Set criteria for assessing progress in installing and replacing the enhanced filtration units; and – Develop a process for evaluating the effectiveness of the enhanced filtration units.	

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	aa. Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities. bb. The following criteria related to diesel emissions shall be implemented on by individual project sponsors as appropriate and feasible: – Diesel nonroad vehicles on site for more than 10 total days shall have either (1) engines that meet EPA on road emissions standards or (2) emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%. Diesel generators on site for more than 10 total days shall be equipped with emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%. – Nonroad diesel engines on site shall be Tier 2 or higher. – Diesel nonroad construction equipment on site for more than 10 total days shall have either (1) engines meeting EPA Tier 4 nonroad emissions standards or (2) emission control technology verified by EPA or CARB for use with nonroad engines to reduce PM emissions by a minimum of 85% for engines for 50 hp and greater and by a minimum of 20% for engines less than 50 hp. – Emission control technology shall be operated, maintained, and serviced as recommended by the emission control technology manufacturer. – Diesel vehicles, construction equipment, and generators on site shall be fueled with ultra-low sulfur diesel fuel (ULSD) or a biodiesel blend approved by the original engine manufacturer with sulfur content of 15 ppm or less. – The construction contractor shall maintain a list of all diesel vehicles, construction equipment, and generators to be used on site. The list shall include the following: i. Contractor and subcontractor name and address, plus contact person responsible for the vehicles or equipment. ii. Equipment type, equipment manufacturer, equipment serial number, engine manufacturer, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. iii. For the emission control technology installed: technology type, serial number, make, model, manufacturer, EPA/CARB verification	

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	number/level, and installation date and hour-meter reading on installation date. – The contractor shall establish generator sites and truck-staging zones for vehicles waiting to load or unload material on site. Such zones shall be located where diesel emissions have the least impact on abutters, the general public, and especially sensitive receptors such as hospitals, schools, daycare facilities, elderly housing, and convalescent facilities. – The contractor shall maintain a monthly report that, for each on road diesel vehicle, nonroad construction equipment, or generator onsite, includes: i. Hour-meter readings on arrival on-site, the first and last day of every month, and on off-site date. ii. Any problems with the equipment or emission controls. iii. Certified copies of fuel deliveries for the time period that identify: 1. Source of supply 2. Quantity of fuel 3. Quantity of fuel, including sulfur content (percent by weight) cc. Project should exceed Title-24 Building Envelope Energy Efficiency Standards (California Building Standards Code). The following measures can be used to increase energy efficiency: – Install programmable thermostat timers – Obtain Third-party HVAC commissioning and verification of energy savings (to be grouped with exceedance of Title 24). – Install energy efficient appliances (Typical reductions for energy-efficient appliances can be found in the Energy Star and Other Climate Protection Partnerships Annual Reports.) – Install higher efficacy public street and area lighting – Limit outdoor lighting requirements – Replace traffic lights with LED traffic lights – Establish onsite renewable or carbon neutral energy systems – generic, solar power and wind power	

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	− Utilize a combined heat and power system − Establish methane recovery in Landfills and Wastewater Treatment Plants. − Locate project near bike path/bike lane − Provide pedestrian network improvements, such as interconnected street network, narrower roadways and shorter block lengths, sidewalks, accessibility to transit and transit shelters, traffic calming measures, parks and public spaces, minimize pedestrian barriers. − Provide traffic calming measures, such as: i. Marked crosswalks ii. Count-down signal timers iii. Curb extensions iv. Speed tables v. Raised crosswalks vi. Raised intersections vii. Median islands viii. Tight corner radii ix. Roundabouts or mini-circles x. On-street parking xi. Chicanes/chokers − Create urban non-motorized zones − Provide bike parking in non-residential and multi-unit residential projects − Dedicate land for bike trails − Limit parking supply through: i. Elimination (or reduction) of minimum parking requirements ii. Creation of maximum parking requirements iii. Provision of shared parking	

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	− Require residential area parking permit. − Provide ride-sharing programs i. Designate a certain percentage of parking spacing for ride sharing vehicles ii. Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles iii. Providing a web site or messaging board for coordinating rides iv. Permanent transportation management association membership and finding requirement.	
Impact AQ-5: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	No mitigation is required.	No mitigation is required.
Biological Resources		
Impact BIO-1: Have a substantial adverse effect, either directly or through habitat modification, 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 US Fish and Wildlife Service.	**PMM BIO-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible. b) Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal ESA, Section 2081 of the California ESA to support issuance of an incidental take permit, and/or as identified in local or regional plans. Conservation strategies to protect the survival and recovery of federally and state-listed endangered and local special status species may include: i. Impact minimization strategies ii. Contribution of in-lieu fees for in-kind conservation and mitigation efforts iii. Use of in-kind mitigation bank credits	Pursuant to CEQA Guidelines Section 15126.4, subd. (a)(4)(A)–(B), there must be a nexus between PMM BIO-1 and environmental impacts from the proposed Project. No mitigation is required as Project impacts would be less than significant. The site does not contain any candidate, sensitive, or special status species or any native habitat. However, the Project would be substantially in conformance with this mitigation measure for the following reasons: The Project site is an infill site located in an urban area that is fully disturbed and was previously fully developed. The Project site does not contain any critical habitat or support any species identified or designated as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service. This mitigation measure is not incorporated because the City has determined that the existing regulatory compliance measures listed below would apply to the Project and ensure potential impacts are less than significant. Applicable regulations:

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	iv. Funding of research and recovery efforts
	v. Habitat restoration
	vi. Establishment of conservation easements
	vii. Permanent dedication of in-kind habitat
	c) Design projects to avoid desert native plants protected under the California Desert Native Plants Act, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies.
	d) Temporary access roads and staging areas will not be located within areas containing sensitive plants, wildlife species or non-native habitat wherever feasible, so as to avoid or minimize impacts to these species
	e) Develop and implement a Worker Environmental Awareness Program (environmental education) to inform project workers of their responsibilities to avoid and minimize impacts on sensitive biological resources.
	f) Retain a qualified botanist to document the presence or absence of special status plants before project implementation.
	g) Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact.
	h) Appoint a qualified biologist to monitor implementation of mitigation measures.
	i) Schedule construction activities to avoid sensitive times for biological resources (e.g. steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased.
	j) Develop an invasive species control plan associated with project construction
	k) If construction occurs during breeding seasons in or adjacent to suitable habitat, include appropriate sound attenuation measures required for sensitive avian species and other best management practices appropriate for potential local sensitive wildlife
	l) Conduct pre-construction surveys to delineate occupied sensitive species' habitat to facilitate avoidance.
	m) Where projects are determined to be within suitable habitat and may impact listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction
		• Federal Endangered Species Act
		• Migratory Bird Treaty Act
		• California Endangered Species Act
		• California Native Plant Protection Act
		• California Desert Native Plants Act
		• Lists from the CDFW:
		  ○ Species of Special Concern
		  ○ Fully Protected Animals Lists
		  ○ Special Vascular Plants, Bryophytes and Lichens List
		  ○ California Sensitive Natural Communities
		  ○ Inventory of Rare and Endangered Plants by the California Native Plant Society

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	surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel. n. Project design should address the protection of habitat on both sides of a freeway to improve effectiveness of the crossings. o. Project sponsors shall consider the impacts of nitrogen deposition on sensitive species.	
Impact BIO-2: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service.	**PMM BIO-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA. b) Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino. c) Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California ESA, or Fully Protected Species afforded protection pursuant to the State Fish and Game Code. d) Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to Lakes and Streambeds. e) Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the MBTA during the breeding season. f) Consult with the CDFW for state-designated sensitive or riparian habitats where furbearing mammals, afforded protection pursuant to the provisions of the State	Pursuant to CEQA Guidelines Section 15126.4, subd. (a)(4)(A)–(B), there must be a nexus between PMM BIO-2 and environmental impacts from the proposed Project. No mitigation measures are required. The Project is located in a developed, urban area. The Project site was formerly developed with public/institutional uses and is currently fully disturbed and vacant. This mitigation measure is not incorporated because the Project site does not contain any wetlands, riparian habitats, sensitive natural community or critical habitat, or support any species identified or designated as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or the U.S. Fish and Wildlife Service. No impacts related to this issue would occur.

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	Fish and Game Code for fur-beaming mammals, are actively using the areas in conjunction with breeding activities. g) Require project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. Where practicable and feasible, require upland buffers that sufficiently minimize impacts to riparian corridors. h) Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats and develop appropriate compensatory mitigation, where required. i) Appoint a qualified wetland biologist to monitor construction activities that may occur in or adjacent to sensitive communities. j) Appoint a qualified wetland biologist to monitor implementation of mitigation measures. k) Schedule construction activities to avoid sensitive times for biological resources and to avoid the rainy season when erosion and sediment transport is increased. l) When construction activities require stream crossings, schedule work during dry conditions and use rubber-wheeled vehicles, when feasible. Have a qualified wetland scientist determine if potential project impacts require a Notification of Lake or Streambed Alteration to CDFW during the planning phase of projects. m) Consult with local agencies, jurisdictions, and landowners where such state-designated sensitive or riparian habitats are afforded protection pursuant an adopted regional conservation plan. n) Install fencing and/or mark sensitive habitat to be avoided during construction activities. o) Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial native plants, when recommended by the qualified wetland biologist, for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils containing invasive species, seeds and/or rhizomes will be avoided as identified by the qualified wetland biologist. p) Revegetate with appropriate native vegetation following the completion of construction activities. as identified by the qualified wetland biologist. q) Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species).	

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	r) Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of native vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.	
Impact BIO-3: 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.	**PMM BIO-3:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands. Such measures may include the following or other comparable measures identified by the Lead Agency. a) Require project design to avoid federally protected aquatic resources consistent with the provisions of Sections 404 and 401 of the CWA, wherever practicable and feasible. b) Where the lead agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters, such as those considered Waters Of the State of California under the State Wetland Definition and Procedures for Dischargers of Dredged or Fill Material to Waters of the State, not protected under Section 404 or 401 of the CWA, seek comparable coverage for these wetlands and waters in consultation with the SWRCB, applicable RWQCB, and CDFW. c) Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federal and state protected aquatic resource to support issuance of a permit under Section 404 of the CWA as administered by the USACE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACE's Final Compensatory Mitigation Rule. The USACE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation: • Permittee-responsible mitigation • Contribution of in-kind in-lieu fees	Pursuant to CEQA Guidelines Section 15126.4, subd. (a)(4)(A)–(B), there must be a nexus between PMM BIO-3 and environmental impacts from the proposed Project. No mitigation measures are required. The Project site is vacant but fully disturbed and is not located on federally or state protected wetlands or water features.

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	• Use of in-kind mitigation bank credits • Where avoidance is determined to be infeasible and d) Where avoidance is determined to be infeasible and proposed projects' impacts exceed an existing Nationwide Permit (NWP) and/or California SWRCB-certified NWP, the lead agency should provide USACE and SWRCB (where applicable) an alternative analysis consistent with the Least Environmentally Damaging Practicable Alternatives in this order of priorities: • Avoidance • Impact Minimization • On-site alternatives • Off-site alternatives e) Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether aquatic resources will be affected and, if necessary, perform formal wetland delineation.	
Impact BIO-4: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	See **PMM BIO-1** through **PMM BIO-3.** **PMM BIO-4:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino. b) Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement related to local ordinances or conservation plans. c) Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting furbearing mammals, during the breeding season. d) Conduct a survey to identify active raptor and other migratory nongame bird nests by a qualified biologist at least two weeks before the start of construction at project sites from February 1 through August 31.	Sections PMM BIO-4 d through f are applicable to the proposed Project and would be incorporated through Project specific MM BIO-1. The Project site is vacant, but fully disturbed and is in an urbanized area in the City of Redlands. No wildlife corridors or native wildlife nursery sites are present on the Project site or in the surrounding area. Further, due to the urbanized nature of the Project area, the potential for native resident or migratory wildlife species movement through the site is extremely limited. Nonetheless, offsite areas along Brookside Avenue contain multiple ornamental trees that could support raptor and/or songbird nests. Migratory nongame native bird species are protected under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 CFR Section 10.13). California Fish and Wildlife Code Sections 3503, 3503.5, and 3513 prohibit take of all birds and their active nests (as listed under the Federal MBTA). The removal of vegetation with nesting birds during the breeding season is considered a potentially significant impact. The Applicant will be required to ensure compliance with all applicable laws and regulations to ensure that no significant impacts to nesting birds would occur due to the removal of the

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	e) Prohibit construction activities with 250 feet of occupied nest of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season. f) Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season. g) When feasible and practicable, proposed projects will be designed to minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors. h) Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site. i) Long linear projects with the possibility of impacting wildlife movement should analyze habitat linkages/wildlife movement corridors on a broad scale to avoid critical narrow choke points that could reduce function of recognized movement corridor. j) Require review of construction drawings and habitat connectivity mapping by a qualified biologist to determine the risk of habitat fragmentation. k) Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat). l) When practicable and feasible design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches. m) Evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Provide wildlife crossings in accordance with proven standards, such as FHWA's Critter Crossings or Ventura County Mitigation Guidelines and in consultation with wildlife corridor authorities. n) Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction. o) Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation	existing trees located on the Project site. As included in Project-specific MM BIO-1, construction plans and Project specifications shall state that if construction or other Project activities are scheduled to occur during the bird breeding season (February through August for raptors and March through August for most migratory bird species), a pre-construction nesting bird survey shall be conducted by a qualified biologist to ensure that active bird nests, will not be disturbed or destroyed. The survey shall be completed no more than three days prior to initial ground disturbance. The nesting bird survey shall include the Project are and adjacent areas where proposed Project activities have the potential to affect active nests, either directly or indirectly due to construction activity or noise. If an active nest is identified, a qualified biologist shall establish an appropriate disturbance limit buffer around the nest using flagging or staking. Construction activities shall not occur within any disturbance limit buffer zones until the nest is deemed inactive by the qualified biologist. Therefore, with adherence to existing regulations and incorporation of Project-specific MM BIO-1, impacts would be less than significant.

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	measures may include the following measures, in addition to the measures outlined in MM-BIO-1(b), where applicable: • Wildlife movement buffer zones • Corridor realignment • Appropriately spaced breaks in center barriers • Stream rerouting • Culverts • Creation of artificial movement corridors such as freeway under- or overpasses • Other comparable measures p) Where the lead agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions. q. Incorporate applicable and appropriate guidance (e.g. FHWA-HEP-16-059), as well as best management practices, to benefit pollinators with a focus on native plants. r. Implement berms and sound/sight barriers at all wildlife crossings to encourage wildlife to utilize crossings. Sound and lighting should also be minimized in developed areas, particularly those that are adjacent to or go through natural habitats. s. Reduce lighting impacts on sensitive species through implementation of mitigation measures such as, but not limited to: – Use high pressure sodium and/or cut-off fixtures instead of typical mercury vapor fixtures for outdoor lighting. – Design exterior lighting to confine illumination to the project site – Provide structural and/or vegetative screening from light-sensitive uses. – Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces. – Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties. t. Reduce noise impacts to sensitive species through implementation of mitigation measures such as, but not limited to:	

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	− Install temporary noise barriers during construction. − Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses. − Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded. − Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures. − Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where repavement is planned − Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction. − Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures. u. Require large buffers between sensitive uses and freeways. v. Create corridor redundancy to help retain functional connectivity and resilience.	
Impact BIO-5: Conflict with any local policies or ordinances protecting biological resources,	See **PMM BIO-1** through **PMM BIO-4.** **PMM BIO-5:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and	Pursuant to CEQA Guidelines Section 15126.4, subd. (a)(4)(A)–(B), there must be a nexus between PMM BIO-1 through PMM BIO-5 and environmental impacts from the proposed Project. Mitigation is not required because Project

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such as a tree preservation policy or ordinance.	ordinances protecting biological resources. Such measures may include the following or other comparable measures identified by the Lead Agency. a) Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources. b) Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by an International Society of Arboriculture (ISA) certified arborist. c) If specific project area trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species, as directed by a qualified biologist. d) Appoint an ISA certified arborist to monitor construction activities that may occur in areas with trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," to facilitate avoidance of resources not permitted for impact. Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed. e) Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree. Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree. f) Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree.	impacts would be less than significant with the implementation of regulatory compliance measures. Nevertheless, the Project would be in substantial conformance with these mitigation measures for the reasons stated below. Chapter 12.52 of the City of Redlands's Municipal Code regulates trees and tree protection along streets and in public places. As part of the Project, existing trees around the perimeter of the Project site would be removed and replaced with a variety of trees and ornamental landscaping. Any trees removed from the Project site, would be subject to applicable regulatory compliance measures. Any tree removals within the public right-of-way would require permit approval from the City's Public Works Director. With adherence to Municipal Code Chapter 12.52, impacts would be less than significant.

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	g) Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration, as directed by the certified arborist. h) If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, as determined by the certified arborist, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and ordinances protecting biological resources i) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include: • Avoidance strategies • Contribution of in-lieu fees • Planting of replacement trees • Re-landscaping areas with native vegetation post-construction • Other comparable measures developed in consultation with local agency and certified arborist.	
Impact BIO-6: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	See **PMM BIO-1** through **PMM BIO-5.** **PMM BIO-6:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs or NCCPs. b) Wherever practicable and feasible, the project shall be designed to avoid lands preserved under the conditions of an HCP or NCCP. c) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP, which would include but not be limited to applicable authorization for incidental take pursuant to	Pursuant to CEQA Guidelines Section 15126.4, subd. (a)(4)(A)–(B), there must be a nexus between PMM BIO-1 through PMM BIO-6 and environmental impacts from the proposed Project. No mitigation measures are required. The Project site is not located in or subject to provisions of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

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	Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California ESA, shall be developed to support issuance of an incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in SMM-BIO-2, where applicable.	
Cultural Resources		
Impact CULT-1: Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5.	**PMM CULT-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Pursuant to CEQA Guidelines Section 15064.5, conduct a record search during the project planning phase at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historical resources were identified. b) During the project planning phase, retain a qualified architectural historian, defined as an individual who meets the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS) in Architectural History, to conduct historic architectural surveys if a built environment resource greater than 45 years in age may be affected by the project or if recommended by the Information Center. c) Comply with Section 106 of the National Historic Preservation Act (NHPA) including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following: • Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible.	PMM CULT-1 measures j through l are applicable to the proposed Project and are included as Mitigation Measure CUL-1. The records search conducted for the Project site indicated that there are no known cultural resources within the Project site (AA 2018). There are no known historical resources located onsite. The Phase I ESAs prepared for the Project site include aerial photographs that detail that the site was used for commercial uses and public/institutional uses since 1925. The Preliminary Geotechnical Investigation conducted for the Project site describes that onsite testing identified artificial fill soils of seven feet in depth across the site. Project construction would include overexcavation to a depth of at least 11 feet below ground surface (bgs) as part of development of the proposed building foundations. Project grading has the potential to encroach into native soils that have not been previously disturbed and could contain archaeological resources. As such, Mitigation Measure CUL-1 requires retention of an archaeologist that would observe ground disturbing activities and recover archaeological resources as necessary. In addition, the archaeologist would be present at the pre-grading conference to establish procedures for archeological resource surveillance. Mitigation CUL-1would also halt work within 50 feet of a find until it can be evaluated by the qualified on-call archaeologist. Construction activities could continue in other areas. If the discovery proves to be significant, additional work, such as data recovery excavation, may be warranted and shall be discussed in consultation with the appropriate regulatory agency(ies). With implementation of Mitigation Measure CUL-1, impacts related to archaeological resources would be less than significant.

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	• Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources. d) If a project requires the relocation, rehabilitation, or alteration of an eligible historical resource, the Secretary of the Interior's Standards for the Treatment of Historic Properties should be used to the maximum extent possible to ensure the historical significance of the resource is not impaired. The application of the standards should be overseen by an architectural historian or historic architect meeting the SOI PQS. Prior to any construction activities that may affect the historical resource, a report, meeting industry standards, should identify and specify the treatment of character-defining features and construction activities and be provided to the Lead Agency for review and approval. e) If a project would result in the demolition or significant alteration of a historical resource eligible for or listed in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register, recordation should take the form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation, and should be performed by an architectural historian or historian who meets the SOI PQS. Recordation should meet the SOI Standards and Guidelines for Architectural and Engineering, which defines the products acceptable for inclusion in the HABS/HAER/HALS collection at the Library of Congress. The specific scope and details of documentation should be developed at the project level in coordination with the Lead Agency. f) During the project planning phase, obtain a qualified archaeologist, defined as one who meets the SOI PQS for archaeology, to conduct a record search at the appropriate Information Center of the California Historical Resources Information System (CHRIS) to determine whether the project area has been previously surveyed and whether resources were identified. g) Contact the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information. h) During the project planning phase, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the qualified professional, the Lead Agency, or the Information Center. In the event the records indicate that no previous survey has been conducted, the qualified professional or Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources.	

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	i) If potentially significant archaeological resources are identified through survey, and impacts to these resources cannot be avoided, a Phase II Testing and Evaluation investigation should be performed by a qualified archaeologist prior to any construction-related ground-disturbing activities to determine significance. If resources determined significant or unique through Phase II testing, and avoidance is not possible, appropriate resource-specific mitigation measures should be established by the lead agency and undertaken by qualified personnel. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the OHP's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format and Guidelines for Archaeological Research Designs. Additional options can include 1) interpretative signage, or 2) educational outreach that helps inform the public of the past activities that occurred in this area. Archaeological materials collected from a significant resource should be curated with a recognized scientific or educational repository j) If a record search or archaeological assessment indicates that the project is located in an area sensitive for archaeological resources, as determined by the Lead Agency in consultation with a qualified archaeologist, retain an archaeological monitor to observe ground disturbing operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. The archaeological monitor should be supervised by an archaeologist meeting the SOI PQS k) Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist, and/or as appropriate, a qualified architectural historian who should make recommendations regarding the work necessary to assess significance. If the cultural resource is determined to be significant under state or federal guidelines, impacts to the cultural resource will need to be mitigated. l) Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine whether these resources are significant. If the archaeologist determines that the discovery is significant, it should be curated with a recognized scientific or educational repository.	
Impact CULT-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5.	See **PMM CULT-1.**	

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Impact CULT-3: Disturb human remains, including those interred outside of dedicated cemeteries.	**PMM CULT-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains. Such measures may include the following or other comparable measures identified by the Lead Agency: a) In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required. b) If any discovered remains are of Native American origin: • Contact the County Coroner to contact the NAHC to designate a Native American Most Likely Descendant (MLD). The MLD should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains • If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation within 48 hours after being notified by the commission, or the landowner or his representative rejects the recommendation of the MLD and the mediation by the NAHC fails to provide measures acceptable to the landowner, obtain a culturally affiliated Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance.	The Project substantially complies with this mitigation measure. If human remains are encountered during construction, State Health and Safety Code Section 7050.5, included as PPP CUL-1, states that no further disturbance shall occur until the County coroner has made the necessary findings as to origin and disposition, pursuant to PRC Section 5097.98. If the county coroner concludes that the remains are of Native American descent, the Native American Heritage Commission must be notified within 24 hours, and NAHC guidelines would be adhered to in the treatment and handling of the remains. With regulatory compliance, included as PPP CUL-1, any potential significant impacts of the Project related to this threshold would be less than significant.
Energy		
Impact ENR-1: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.	No mitigation is required.	No mitigation is required.
Impact ENR-2: Conflict with or obstruct a state or local plan for	No mitigation is required.	No mitigation is required.

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renewable energy or energy efficiency.		
Geology and Soils		
Impact GEO-1: 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.	No mitigation is required.	No mitigation is required.
Impact GEO-2: Result in substantial soil erosion or the loss of topsoil	**PMM-GEO-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems. b) Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list	Pursuant to CEQA Guidelines Section 15126.4, subd. (a)(4)(A)–(B), there must be a nexus between PMM GEO-1 and environmental impacts from the proposed Project. The Project would result in less than significant impacts as a result of compliance with regulatory requirements, but nonetheless substantially conforms with this mitigation measure. The Project would require approval of a SWPPP to minimize soils erosion from stormwater during construction. Additionally, the Project would require a Water Quality Management Plan in order to reduce soil erosion from stormwater during Project operation. With implementation of the SWPPP and Water Quality Management Plan, impacts related to soil erosion or loss of topsoil would be less than significant.

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	of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program. c) Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation. d) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils.	
Impact GEO-3: 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.	No mitigation is required.	No mitigation is required.
Impact GEO-4: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.	No mitigation is required.	No mitigation is required.
Impact GEO-5: 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.	No mitigation is required.	No mitigation is required.
Impact GEO-6: Directly or indirectly destroy a unique	**PMM-GEO-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects	The Project substantially conforms to PMM-GEO 1 measures 1 through h. Project excavation has the potential to impact paleontologically sensitive older Quaternary sediments. As

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paleontological resource or site or unique geologic feature.	related to paleontological resources. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Ensure compliance with the Paleontological Resources Preservation Act, the Federal Land Policy and Management Act, the Antiquities Act, Section 5097.5 of the Public Resources Code (PRC), adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible, by adhering to and incorporating the performance standards and practices from the 2010 Society for Vertebrate Paleontology (SVP) standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. b) Obtain review by a qualified paleontologist (e.g., who meets the SVP standards for a Principal Investigator or Project Paleontologist or the Bureau of Land Management (BLM) standards for a Principal Investigator), to determine if the project has the potential to require ground disturbance of parent material with potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. The assessment should include museum records searches, a review of geologic mapping and the scientific literature, geotechnical studies (if available), and potentially a pedestrian survey, if units with paleontological potential are present at the surface. c) Avoid exposure or displacement of parent material with potential to yield unique paleontological resources. d) Where avoidance of parent material with the potential to yield unique paleontological resources is not feasible: 1) All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered. 2) A qualified paleontologist prepares a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of unique paleontological resources encountered during construction. The PRMP should adhere to and incorporate the performance standards and practices from the 2010 SVP Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. If unique paleontological resources are encountered during construction, use a qualified paleontologist to oversee the implementation of the PRMP.	such, the Project will incorporate Project-specific Mitigation Measure PAL-1, which requires preparation of a Paleontological Resource Mitigation Program (PRMP) and paleontological monitoring for ground disturbing activities occurring past five feet in depth within native soil, as determined by the Project paleontologist. With implementation of MM PAL-1, impacts related to this threshold would be less than significant.

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	3) Monitor ground disturbing activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontological monitor meeting the standards of the SVP or the BLM to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols. 4) Identify where ground disturbance is proposed in a geologic unit having the potential for containing fossils and specify the need for a paleontological monitor to be present during ground disturbance in these areas. e) Avoid routes and project designs that would permanently alter unique geological features. f) Salvage and document adversely affected resources sufficient to support ongoing scientific research and education. g) Significant recovered fossils should be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility. h) Following the conclusion of the paleontological monitoring, the qualified paleontologist should prepare a report stating that the paleontological monitoring requirement has been fulfilled and summarize the results of any paleontological finds. The report should be submitted to the lead CEQA and the repository curating the collected artifacts, and should document the methods and results of all work completed under the PRMP, including treatment of paleontological materials, results of specimen processing, analysis, and research, and final curation arrangements.	
Greenhouse Gases		
Impact GHG-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	**PMM-GHG-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into project design including:	Pursuant to CEQA Guidelines Section 15126.4, subd. (a)(4)(A)–(B), there must be a nexus between PMM GHG-1 and environmental impacts from the proposed Project. The Project would result in less than significant impacts as a result of compliance with regulatory requirements, but nonetheless substantially conforms with this mitigation measure. The Project would incorporate energy efficiency measures of Title 24 of the California Building Code. Additionally, the

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	i. Use energy efficient materials in building design, construction, rehabilitation, and retrofit. ii. Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems. iii. Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight. iv. Incorporate passive environmental control systems that account for the characteristics of the natural environment. v. Use high-efficiency lighting and cooking devices. vi. Incorporate passive solar design. vii. Use high-reflectivity building materials and multiple glazing. viii. Prohibit gas-powered landscape maintenance equipment. ix. Install electric vehicle charging stations. x. Reduce wood burning stoves or fireplaces. xi. Provide bike lanes accessibility and parking at residential developments. b) Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines. c) Include off-site measures to mitigate a project's emissions. d) Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to: i. Use energy and fuel-efficient vehicles and equipment; ii. Deployment of zero- and/or near zero emission technologies; iii. Use lighting systems that are energy efficient, such as LED technology; iv. Use the minimum feasible amount of GHG-emitting construction materials;	Project would provide mixed-use buildings within 0.5-mile from the Arrow Line and provide sidewalks to promote walkability and bike storage to promote biking, which would reduce VMT and greenhouse gas emissions.

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	v. Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production; vi. Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse; vii. Incorporate design measures to reduce energy consumption and increase use of renewable energy; viii. Incorporate design measures to reduce water consumption; ix. Use lighter-colored pavement where feasible; x. Recycle construction debris to maximum extent feasible; xi. Plant shade trees in or near construction projects where feasible; and xii. Solicit bids that include concepts listed above. e) Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following: i. Promote transit-active transportation coordinated strategies; ii. Increase bicycle carrying capacity on transit and rail vehicles; iii. Improve or increase access to transit; iv. Increase access to common goods and services, such as groceries, schools, and day care; v. Incorporate affordable housing into the project; vi. Incorporate the neighborhood electric vehicle network; vii. Orient the project toward transit, bicycle and pedestrian facilities; viii. Improve pedestrian or bicycle networks, or transit service; ix. Provide traffic calming measures; x. Provide bicycle parking; xi. Limit or eliminate park supply through: i. Elimination (or reduction) of minimum parking requirements ii. Creation of maximum parking requirements	

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	iii. Provision of shared parking. xii. Unbundle parking costs; xiii. Provide parking cash-out programs; xiv. Implement or provide access to commute reduction program; f) Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network; g) Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and h) Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that: i. Provide car-sharing, bike sharing, and ride-sharing programs; ii. Provide transit passes; iii. Shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services; iv. Provide incentives or subsidies that increase that use of modes other than single occupancy vehicle; v. Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms; vi. Provide employee transportation coordinators at employment sites; vii. Provide a guaranteed ride home service to users of non-auto modes. i) Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles; j) Land use siting and design measures that reduce GHG emissions, including: i. Developing on infill and brownfields sites; ii. Building compact and mixed-use developments near transit;	

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	iii. Retaining on-site mature trees and vegetation, and planting new canopy trees; iv. Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and v. Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse. k. Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities. The measures provided above are also intended to be applied in low income and minority communities as applicable and feasible. l. Require at least five percent of all vehicle parking spaces include electric vehicle charging stations, or at a minimum, require the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in. m. Encourage telecommuting and alternative work schedules, such as: i. Staggered starting times ii. Flexible schedules iii. Compressed work weeks n. Implement commute trip reduction marketing, such as: i. New employee orientation of trip reduction and alternative mode options ii. Event promotions iii. Publications o. Implement preferential parking permit program p. Implement school pool and bus programs q. Price workplace parking, such as: i. Explicitly charging for parking for its employees; ii. Implementing above market rate pricing;	

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	iii. Validating parking only for invited guests; iv. Not providing employee parking and transportation allowances; and v. Educating employees about available alternatives.	
Impact GHG-2: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases	See **PMM GHG-1.**	
Hazards and Hazardous Materials		
Impact HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	**PMM HAZ-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the routine transport, use, or disposal of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials. b) Specify Project requirements for interim storage and disposal of hazardous materials during construction and operation. Storage and disposal strategies must be consistent with applicable federal, state, and local statutes and regulations. Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the business plan for projects as applicable and appropriate. c) Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following:	Pursuant to CEQA Guidelines Section 15126.4, subd. (a)(4)(A)–(B), there must be a nexus between PMM HAZ-1 and environmental impacts from the proposed Project. The Project would result in less than significant impacts as a result of compliance with regulatory requirements, but nonetheless substantially conforms with this mitigation measure. Like the majority of construction projects, construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings, cleaning materials, fuels and oils. However, all materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Also, construction work would be performed in compliance with applicable federal Occupational Safety and Health Administration (OSHA) Safety and Health Standards and CalOSHA requirements to ensure the safety of construction workers. As discussed in the Phase I Environmental Site Assessment, included as Appendix F1, conducted for 212 Brookside Avenue, two recognized environmental conditions (RECs) were identified. Based on a review of records at the City of Redlands Department of Building and Safety, an underground diesel fuel storage tank (UST) was removed from the site in 1996. The UST was replaced with an aboveground diesel fuel storage tank. No soil sampling report was found for the removal of this UST. Additionally, during site reconnaissance, significant quantities of used bullet shells and bullet fragments were found inside the now-demolished shooting range room.

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	• The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids. • The location of such hazardous materials. • An emergency response plan including employee training information. • A plan that describes the way these materials are handled, transported and disposed. d) Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction. e) Avoid overtopping construction equipment fuel gas tanks. f) Properly contain and remove grease and oils during routine maintenance of construction equipment. g) Properly dispose of discarded containers of fuels and other chemicals. h) Prior to shipment remove the most volatile elements, including flammable natural gas liquids, as feasible. i) Identify and implement more stringent tank car safety standards. j) Improve rail transportation route analysis, and modification of routes based on that analysis. k) Use the best available inspection equipment and protocols and implement positive train control. l) Reduce train car speeds to 40 miles per hour when passing through urbanized areas of any size. m) Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments. n) Notify in advance county and city emergency operations offices of all crude oil shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident. o) Report quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying crude oil identified.	The Phase I Environmental Site Assessment concluded that there is a potential for lead from bullets accumulating in soil within the shooting range. As such, a Phase II Environmental Site Assessment was conducted with soils testing. Soils testing results indicated low concentrations of petroleum hydrocarbons in soils in two samples and low concentrations of lead. However, these concentrations were below the Department of Toxic Substances (DTSC) residential and commercial limits. As such, the Phase II Environmental Site Assessment concluded that no additional testing was needed. Therefore, impacts related to the former UST and shooting range would be less than significant. Operation of the Project's residential and commercial uses would involve the use and storage of small quantities of potentially hazardous materials in the form of typical cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance. The use of these materials would be in small quantities and in accordance with the manufacturers' instructions for use, storage, and disposal of such products. Therefore, with compliance with applicable regulations, the Project's potential impacts would be less than significant.

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	p) Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training. q) Undertake annual emergency responses scenario/field-based training including Emergency Operations Center Training activations with local emergency response agencies.	
Impact HAZ-2: 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.	See **PMM HAZ-1.** **PMM HAZ-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce hazards related to the reasonably foreseeable upsets and accidents involving the release of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Removal of the most volatile elements, including flammable natural gas liquids, prior to shipment; b) More stringent tank car safety standards; c) Improved rail transportation route analysis, and modification of routes based on that analysis; d) Utilization of the best available inspection equipment and protocols, and implementation of positive train control; e) Reduced train car speeds to 40 miles per hour when passing through urbanized areas of any size; f) Limitations on storage of hazardous materials tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments; g) Advance notification to county and city emergency operations offices of all crude oil and hazardous materials shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident; h) Quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying hazardous materials.	Pursuant to CEQA Guidelines Section 15126.4, subd. (a)(4)(A)–(B), there must be a nexus between PMM HAZ-1 and PMM HAZ-2 and environmental impacts from the proposed Project. The Project would result in less than significant impacts as a result of compliance with regulatory requirements, but nonetheless substantially conforms with this mitigation measure. Construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils typical of construction projects. However, all materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Also, all construction work would be performed consistent with applicable federal Occupational Safety and Health Administration (OSHA) Safety and Health Standards and CalOSHA requirements to ensure the safety and well-being of construction workers. As discussed in the Phase I Environmental Site Assessment conducted for 212 Brookside Avenue, two recognized environmental conditions (RECs) were identified. Based on a review of records at the City of Redlands Department of Building and Safety, an underground diesel fuel storage tank (UST) was removed from the site in 1996. The UST was replaced with an aboveground diesel fuel storage tank. No soil sampling report was found for the removal of this UST. Additionally, during site reconnaissance, significant quantities of used bullet shells and bullet fragments were found inside the now-demolished shooting range room. The Phase I Environmental Site Assessment concluded that there is a potential for lead from bullets accumulating in soil within the shooting range. As such, a Phase II Environmental Site Assessment was conducted with soils testing. Soils testing results indicated low concentrations of petroleum hydrocarbons in

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		soils in two samples and low concentrations of lead. However, these concentrations were below the Department of Toxic Substances (DTSC) residential and commercial limits. As such, the Phase II Environmental Site Assessment concluded that no additional testing was needed. Therefore, impacts related to the former UST and shooting range would be less than significant. The City has determined that, with compliance with applicable regulations, the Project's potential impacts would be less than significant.
Impact HAZ-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school	See **PMM HAZ-1** and **PMM HAZ-2.** **PMM HAZ-3:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the release of hazardous materials within one-quarter mile of schools, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible. b) Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notifications of the anticipated schedule of transport of such materials	Pursuant to CEQA Guidelines Section 15126.4, subd. (a)(4)(A)–(B), there must be a nexus between PMM HAZ-1, PMM HAZ-2, and PMM HAZ-3 and environmental impacts from the proposed Project. The Project would result in less than significant impacts as a result of compliance with regulatory requirements, but nonetheless substantially conforms with this mitigation measure. Construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils typically used in construction. The types of potentially hazardous substances and materials that would be used in association with the operation of the Project would include those typical of residential and commercial developments, such as small quantities of cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance. However, all such substances and materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. With compliance to applicable laws, regulations, and manufacturers' instructions, construction of the Project would not create a significant risk of exposure to hazardous materials for schools.
Impact HAZ-4: Be located on a site which is included on a list of hazardous materials sites compiled	**PMM HAZ-4:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects	Pursuant to CEQA Guidelines Section 15126.4, subd. (a)(4)(A)–(B), there must be a nexus between PMM HAZ-4 and environmental impacts from the proposed Project. The Project

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pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.	related to projects that are located on a site which is included on the Cortese List, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) For any listed sites or sites that have the potential for residual hazardous materials as a result of historic land uses, complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects. b) Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer. c) Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action. d) Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans. e) Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building. f) Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps. g) Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency. h) Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g.,	would result in less than significant impacts as a result of compliance with regulatory requirements, but nonetheless substantially conforms with this mitigation measure. According to the DTSC EnviroStor database, the Project site is not located on a federal Superfund site, State response site, voluntary cleanup site, school cleanup site, corrective action site, or tiered permit site (DTSC 2022). Additionally, according to the State Water Resources Control Board's Geotracker database, the Project site is not located on a Leaking UST Cleanup Site, Cleanup Program Site, Military Cleanup Site, Military Privitized Site, or Military UST site (SWRCB 2022). Therefore, the proposed Project would result in less than significant impacts related to a known hazardous materials site pursuant to Government Code Section 65965.5 and would not create a significant hazard to the public or the environment.

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	identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to, notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority. i) Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies. j) Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building. k) As needed and appropriate, prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site. l) Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction. m) If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915- 25919.7; and other local regulations.	

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	n) Where projects include the demolitions or modification of buildings constructed prior to 1978, complete an assessment for the potential presence or lack thereof of ACM, lead based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law. o) Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.	
Impact HAZ-5: 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	See **PMM NOISE-1.**	No mitigation is required. There are no private or public airstrips within the vicinity of the Project area. The closest airport is the Redlands Municipal Airport, at 1755 Sessums Drive, Redlands, CA, which is approximately 2.6 miles from the Project site. As such, the Project is not within the airport's land use plan, noise contours, or influence area, and the Project would not result in an airport-related safety hazard for people residing or working in the Project area.
Impact HAZ-6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan	**PMM HAZ-5:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Continue to coordinate locally and regionally based on ongoing review and integration of projected transportation and circulation conditions.	Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation including proper emergency exits for visitors, employees, and residents. Project site access and circulation plans would be subject to review and approval by the Redlands Fire Department (RFD). Furthermore, the Project would comply with City of Redlands General Plan Policy 5-A.15, which requires two means of ingress/egress into new residential communities. In addition, the City of Redlands has completed this Hazard Mitigation Plan in accordance with 44 Code of Federal Regulations (44 CFR Parts 201 and 206). The

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	b) Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks; c) Continue to evaluate lifeline routes for movement of emergency supplies and evacuation.	Project would not interfere with the City's Hazard Mitigation Plan.
Impact HAZ-7: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	See Wildfire, Impact WF-2.	No mitigation measures are required. The Project site is located in a fully urbanized area and is not within a High Fire Hazard Severity Zone and is not near a wildland fire hazard.
Hydrology and Water Quality		
Impact HYD-1: Potential to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality	**PMM HYD-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction. b) Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable. c) Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control. d) Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures. e) Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings. f) Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse: g) Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project.	The Project's impacts would be less than significant as a result of the implementation of regulatory compliance measures. Nevertheless, the Project substantially conforms with this mitigation measure because the Project is subject to regulatory compliance measures such as NPDES and SWPPP regulations that are capable of avoiding or reducing the potential impacts on water quality. The Project would comply with waste discharge requirements that are within the jurisdiction and authority of the Regional Water Quality Control Board and other regulatory agency requirements including, but not limited to, the NPDES permitting requirements.

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	h) Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities. i) Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase. j) Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff. k) Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process. l) Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels. m) Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible.	
Impact HYD-2: Potential to substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	**PMM HYD-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Avoid designs that require continual dewatering where feasible. For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that	The Project's impacts would be less than significant, and no mitigation is required. Nevertheless, Project substantially conforms with this mitigation measure because the Project site is located in an urbanized area that does not contain any significant groundwater recharge areas. As discussed in the Preliminary Water Quality Management Plan, included as Appendix H, the Project would maximize permeable surfaces in order to promote groundwater recharge.

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	prevents degrading of surface water and minimizes adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code. b) Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize new impervious surfaces, including the use of in-lieu fees and off-site mitigation. c) Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface. d) Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.	
Impact HYD-3a: 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 result in substantial erosion or siltation on- or off-site.	See **PMM HYD-1.**	The Project's impacts would be less than significant with the implementation of regulatory compliance measures. Nevertheless, the Project substantially conforms to this mitigation measure, because the Project is required to comply with regulatory requirements including NPDES and City requirements, including those requiring the preparation of a Project-specific SWPPP and WQMP. The proposed stormwater BMPs would include multiple planter boxes for stormwater infiltration and an infiltration chamber under parking areas.
Impact HYD-3b: 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 substantially increase the rate or amount of flooding on- or off-site.	See **PMM HYD-1** and **PMM HYD-2.**	The Project's impacts would be less than significant as a result of the implementation of regulatory compliance measures. Nevertheless, the Project substantially conforms to this mitigation measure, because the Project is required to comply with regulatory requirements including NPDES and City requirements, including those requiring the preparation of a Project-specific SWPPP and WQMP. The proposed stormwater BMPs would include multiple planter boxes for stormwater infiltration and infiltration chambers under parking areas.
Impact HYD-3c: 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 create or	See **PMM HYD-1** and **PMM HYD-2.**	The Project's impacts would be less than significant as a result of the implementation of regulatory compliance measures. Nevertheless, the Project substantially conforms to this mitigation measure, because the Project is required to comply with regulatory requirements including NPDES and City requirements, including those requiring the preparation of a Project-specific SWPPP and WQMP. The proposed

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contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.		stormwater BMPs would include multiple planter boxes for stormwater infiltration and infiltration chambers under parking areas.
Impact HYD-4: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.	**PMM-HYD-4:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.	According to FEMA flood insurance rate maps, a portion the Project site is located within flood Zone AO, which would have an approximate flood depth of 1 foot. However, the Project is required to comply with City Municipal Code Chapter 15.32, which includes regulations for development within flood hazard areas. Regulations include requiring any new occupiable finished floor to be 2 feet above the 100-year flood elevation. With adherence to Municipal Code Chapter 15.32, the Project would not risk release of pollutants due to inundation in a flood hazard zone. Additionally, the Project site is not located in a seiche or tsunami flood hazard area.
Impact HYD-5: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	See **PMM HYD-2.**	The Project's impacts would be less than significant as a result of the implementation of regulatory compliance measures. Nevertheless, the Project substantially conforms to this mitigation measure, because the Project is required to comply with regulatory requirements including NPDES and City requirements, including those requiring the preparation of a Project-specific SWPPP and WQMP. The proposed stormwater BMPs would include multiple planter boxes for stormwater infiltration and an infiltration chamber under parking areas. The Project would not interfere with a groundwater management plan as it would increase the pervious surfaces onsite and would not reduce groundwater levels.
Land Use		
Impact LU-1: Potential for the Project to physically divide an established community	**PMM LU-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may	No mitigation is required. The Project site is currently vacant and undeveloped. The Project vicinity is highly urbanized and generally built out. The local vicinity is characterized by a blend of commercial, residential, and office uses. The Project would provide a new mixed-use development that would

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	include the following or other comparable measures identified by the Lead Agency: a) Facilitate good design for land use projects that build upon and improve existing circulation patterns b) Encourage implementing agencies to orient transportation projects to minimize impacts on existing communities by: • Selecting alignments within or adjacent to existing public rights of way. • Design sections above or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project. • Wherever feasible incorporate direct crossings, overcrossings, or under crossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles). c) Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to: • Alignment shifts to minimize the area affected. • Reduction of the proposed right-of-way take to minimize the overall area of impact. • Provisions for bicycle, pedestrian, and vehicle access across improved roadways.	include residential uses and restaurant uses. As such, the Project would be an infill project providing uses consistent with the mixed-use character of the surrounding area. Given the type of uses in the Project site vicinity, and the infill character of the Project, it would not physically divide an established community. The Project would not disrupt or divide an established community through a change in street or land use patterns within the community.
Impact LU-2: 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	**PMM LU-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) When an inconsistency with the adopted general plan policy or land use regulation (adopted for the purpose of avoiding or mitigating an impact) is identified modify the transportation or land use project to eliminate the conflict; or, determine if the environmental, social, economic, and engineering benefits of the project warrant an amendment to the general plan or land use regulation.	No mitigation is required as the proposed Project would not conflict with the City of Redlands General Plan, as shown in Table LU-1.
Mineral Resources		
Impact MIN-1: Potential to result in the loss of availability of a known	**PMM MIN-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can	No mitigation is required. The Project site is located within an urbanized area of the City of Redlands. According to

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mineral resource that would be of value to the region and the residents of the state.	and should consider mitigation measures to reduce the use of mineral resources that could be of value to the region, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects. b) Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures such as: 1) Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable. 2) Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site. 3) Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations. 4) Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.	Redlands General Plan Figure 6-4, the Project site is designated as MRZ-3, which contains areas with known or inferred mineral occurrences of undetermined mineral resource significance. The Project site is not zoned for mineral extraction use and has not been historically used for mineral resource extraction.
Impact MIN-2 Potential to 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.	See **PMM MIN-1.**	No mitigation is required. The Project site is located within an urbanized area of the City of Redlands. According to Redlands General Plan Figure 6-4, the Project site is designated as MRZ-3, which contains areas with known or inferred mineral occurrences of undetermined mineral resource significance. The Project site is not zoned for mineral extraction use and has not been historically used for mineral resource extraction.
Noise		

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Impact NOISE-1: 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.	**PMM NOISE-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Install temporary noise barriers during construction. b) Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses. c) Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance d) Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem. e) Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance. f) Designate an on-site construction complaint and enforcement manager for the project. g) Ensure that construction equipment is properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded. h) Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact	The Project's impacts would be less than significant as a result of the implementation of regulatory compliance measures. Nevertheless, the Project substantially conforms to this mitigation measure. The Project is required to comply with regulatory control measures in City of Redlands Municipal Code Section 8.06.120, which regulates noise from construction activities (e.g. construction activities will occur between the hours of 7 a.m. and 6 p.m. on weekdays, including Saturdays, with no activities taking place on Sundays or federal holidays; Municipal Code Section 8.06.070, which sets exterior noise limits based on land use; and Municipal Code Section 8.06.080, which sets interior noise limits based on land use. Additionally, procedures and phone numbers would be posted at the construction site for notifying City of Redlands staff, Redlands Police Department, and the construction contractor to notify regarding complaints.

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	equipment, whenever such procedures are available and consistent with construction procedures. i) Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors. j) Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction. k) Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned l) Projects that require pile driving or other construction noise above 90 dBA in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater than 90 dBA; a set of site-specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant. m) Use land use planning measures, such as zoning, restrictions on development, site design, and buffers to ensure that future development is compatible with adjacent transportation facilities and land uses; n) Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance. o) Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction. p) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction. q) Use of portable barriers in the vicinity of sensitive receptors during construction. r) Implement noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings (for instance by the use of sound	

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	blankets), and implement if such measures are feasible and would noticeably reduce noise impacts. s) Monitor the effectiveness of noise attenuation measures by taking noise measurements. t) Maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other new noise-generating facilities. u) Construct sound reducing barriers between noise sources and noise-sensitive land uses. v) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction. w) Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures. x) Locate transit-related passenger stations, central maintenance facilities, decentralized maintenance facilities, and electric substations away from sensitive receptors to the maximum extent feasible.	
Impact NOISE-2: Generation of excessive groundborne vibration or groundborne noise levels.	See **PMM NOISE-1.** **PMM-NOISE-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency: a) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations. b) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds.	Sections PMM NOISE-2 sections d through f are applicable to the proposed Project and would be incorporated through Project specific MM N-1, which would require a setback of 30 feet from the western boundary of the site for the use of heavy construction equipment over 80,000 pounds. The Project is required to comply with regulatory control measures in City of Redlands Municipal Code Section 8.06.120, which regulates noise from construction activities (e.g., construction activities will occur between the hours of 7 a.m. and 6 p.m. on weekdays, including Saturdays, with no activities taking place on Sundays or federal holidays. Additionally, procedures and phone numbers would be posted at the construction site for notifying City of Redlands staff, Redlands Police Department, and the construction contractor to notify regarding complaints.

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	c) For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain. d) Restrict construction activities to permitted hours in accordance with local jurisdiction regulation. e) Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silences, wraps). f) Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.	
Impact NOISE-3: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels.	See **PMM NOISE-1.**	No mitigation is required. There are no private or public airstrips within the vicinity of the Project area. The closest airport is the Redlands Municipal Airport, at 1755 Sessums Drive, Redlands, CA, which is approximately 2.6 miles from the Project site. The Project site is outside the noise contours for the airport. As such, the Project would not expose people residing or working in the area to excessive noise levels.
Population and Housing		
Impact POP-1: Induce substantial unplanned population growth to areas of the region either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., by extending roads and other infrastructure)	There are no project-level mitigation measures.	No mitigation is required. The Project would provide infill development within a currently developed urban setting. It would not add new infrastructure beyond that required to connect the Project to existing utility lines and adjacent roadways. Therefore, the Project would not open new areas to development or promote new development in an area not otherwise expected to be developed. The Project's 131 residential units are expected to result in an increase of 191 residents onsite. Additionally, the Project would result in an increase of 85 employees. The Project's estimated housing, population, and employment growth would be within SCAG's 2045 growth projections based on the

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		2020-2045 RTP/SCS and would occur on a Project site located within a HQTA and TPA.
Impact POP-2: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.	**PMM-POP-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the displacement of existing housing, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people. b) Prioritize the use existing ROWs, wherever feasible. c) Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction. d) Review capacities of available urban infrastructure and augment capacities as needed to accommodate demand in locations where growth is desirable to the local lead Agency and encouraged by the SCS (primarily TPAs, where applicable). e) When General Plans and other local land use regulations are amended or updated, use the most recent growth projections and RHNA allocation plan.	No mitigation is required. The Project site is currently vacant and undeveloped and does not contain any existing housing. Therefore, development of the Project would not displace existing people or housing.
Fire Services		
Impact PSF-1: Result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.	See **PMM PSP-1.**	Mitigation is not required because Project impacts would be less than significant with implementation of regulatory requirements. The Project would be subject to compliance with fire protection design standards per the California Building Code, California Fire Code, the City of Redlands Municipal Code, and City of Redlands Fire Department, to ensure adequate fire protection. Existing facilities and planned future facilities are capable of providing acceptable response times for fire protection and emergency response services. The Project site is served by Redlands Fire Department Station 261, which is located at 525 E Citrus Avenue, which is approximately 0.6 roadway miles from the Project site. Station 263 is located at 10 W Pennsylvania Avenue approximately 2.0 roadway miles from the Project site. In addition, Station 264 is located at 1270

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		West Park Avenue approximately 1.1 roadway miles from the Project site. Additionally, the Project would be subject to the existing regulations in the City's Fire Code related to emergency access and would be required to pay development fees pursuant to the Redlands Municipal Code. Therefore, the Project would not result in new or physically altered government facilities.
Police Services		
Impact PSP-1: Result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities, need for new or physically altered police facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.	**PMM PSP-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new emergency response facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Coordinate with emergency response agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times or other performance objectives for emergency response services and that any required additional construction of buildings is incorporated into the project description. b) Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements, as appropriate and applicable, to mitigate identified CEQA impacts. c) Project sponsors can and should develop traffic control plans for individual projects. Traffic control plans should include information on lane closures and the anticipated flow of traffic during the construction period. The basic objective of each traffic control plan (TCP) is to permit the contractor to work within the public right of way efficiently and effectively while maintaining a safe, uniform flow of traffic. The construction work and the public traveling through the work zone in vehicles, bicycles or as pedestrians must be given equal consideration when developing a traffic control plan.	The Project's impacts would be less than significant. Nevertheless, the Project substantially conforms to this mitigation measures because the Project is not expected to result in a substantial increase in demand for police protection services that would require the need for a new or physically altered police facility to maintain service ratios. In addition, existing facilities are capable of providing acceptable response times and payment of development impact fees are equally effective in minimizing impacts to police service. The Project site is currently served by the Redlands Police Department. The main police station is located at 1270 West Park Avenue, with four other divisions located citywide, including one at 30 Cajon Street, adjacent to the Project site. The project would incorporate crime prevention features into the design of the buildings and public spaces, such as lighting of entryways and public spaces. The Project would feature the following: • Security cameras • Perimeter lighting to supplement the street lighting and to provide increased visibility and security
Schools		
Impact PSS-1: Result in substantial adverse physical impacts associated with the provision of new or physically altered educational facilities, need for new or physically altered educational	**PMM PSS-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new or physically altered school facilities, as applicable and feasible.	Pursuant to Government Code Section 65995 et seq., the need for additional school facilities is addressed through compliance with school impact fee assessment. SB 50 (Chapter 407 of Statutes of 1998) sets forth a state school facilities construction program that includes restrictions on a local jurisdiction's ability to condition a project on mitigation of a

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facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.	Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.	project's impacts on school facilities in excess of fees set forth in the Government Code. These fees are collected by school districts at the time of issuance of building permits for development projects. Pursuant to Government Code Section 65995 applicants shall pay developer fees to the appropriate school districts at the time building permits are issued; and payment of the adopted fees provides full and complete mitigation of school impacts.
Library Services		
Impact PSL-1: Result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, need for new or physically altered library facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.	**PMM PSL-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of construction of new or altered library facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where construction or expansion of library facilities is required to meet public library service ratios, require library fees, as appropriate and applicable, to mitigate identified CEQA impacts	The proposed residences would result in a limited incremental increase in the need for additional services, such as public libraries and post offices, etc. Because the Project area is already served by other services and the Project would result in a limited increase in residences, the Project would not result in the need for new or physically altered facilities to provide other services, the construction of which could cause significant environmental impacts. Furthermore, the Applicant would be required to pay Developer Impact Fees to offset any impacts to public services.
Recreation		
Impact REC-1: Potential to 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.	**PMM REC-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on the use of existing neighborhood and regional parks or other recreational facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies. b) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as:	No mitigation is required. However, the Project would substantially conform with PMM REC-1. The Project would provide 23,476 SF of common open space and would be compliant with open space requirements. The Project applicant would be responsible for meeting any park fee requirements pursuant to the Quimby Act and in accordance with Redlands Municipal Code Chapter 3.32.

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	i. Increasing the accessibility to natural areas for outdoor recreation ii. Utilizing "green" development techniques iii. Promoting water-efficient land use and development iv. Encouraging multiple uses, such as the joint use of schools v. Including trail systems and trail segments in General Plan recreation standards	
Impact REC-2: Result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, need for new or physically altered park facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, or other performance objectives. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	See **PMM REC-1**, **PMM AQ-2**, and **PMM NOISE-1.**	No mitigation is required. The Project would provide 23,476 SF of common open space. These recreational amenities include multiple courtyards, a pool, and spa. While the Project does include recreational facilities, impacts related to construction of this facility are analyzed throughout this SCEA and would not result in an adverse environmental impact. Furthermore, the Applicant would be required to pay Developer Impact Fees to offset any impacts to recreational facilities.
Transportation, Traffic, and Safety		
Impact TRA-1: Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	No mitigation is required.	No mitigation is required.
Impact TRA-2: Conflict or be inconsistent with CEQA Guidelines section 15064.3(b).	**PMM-TRA-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts. Such measures may include the following or other comparable measures identified by the Lead Agency: • Transportation demand management (TDM) strategies should be incorporated into individual land use and transportation projects and	No mitigation is required as Project impacts would be less than significant. However, the Project would substantially conform with PMM-TRA-1. Due to the Project's location in a TPA, impacts related to VMT would be less than significant. Additionally, the Project would include sidewalks along all street frontages. Additionally, the Project would include bike lockers to promote bike use. Furthermore, the Project would

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	plans, as part of the planning process. Local agencies should incorporate strategies identified in the Federal Highway Administration's publication: Integrating Demand Management into the Transportation Planning Process: A Desk Reference (August 2012) into the planning process (FHWA 2012). For example, the following strategies may be included to encourage use of transit and non-motorized modes of transportation and reduce vehicle miles traveled on the region's roadways: ○ include TDM mitigation requirements for new developments; ○ incorporate supporting infrastructure for non-motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks; ○ provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road and parking pricing; ○ implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools; ○ develop TDM-specific performance measures to evaluate project-specific and systemwide performance; ○ incorporate TDM performance measures in the decision-making process for identifying transportation investments; ○ implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and ○ set aside funding for TDM initiatives. ○ The increase in per capita VMT on facilities experiencing LOS F represents a significant impact compared to existing conditions. To assess whether implementation of these specific mitigation strategies would result in measurable traffic congestion reductions, implementing actions may need to be further refined within the overall parameters of the proposed Plan and matched to local conditions in any subsequent project-level environmental analysis.	provide convenient and direct pedestrian access to the nearby Downtown train station less than 0.5-mile to the north.
Impact TRA-3: Substantially increase hazards due to geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	No mitigation is required.	No mitigation is required.
Impact TR-4: Result in inadequate emergency access.	**PMM TRA-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can	The Project's impacts would be less than significant as a result of implementation of regulatory requirements. Nevertheless,

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Impact WF-1: Substantially impair an adopted emergency response plan or emergency evacuation plan	and should consider mitigation measures to reduce substantial adverse effects which may substantially impair implementation of an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements: ○ Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow. ○ Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone. ○ Scheduling of truck trips outside of peak morning and evening commute hours. ○ Limiting of lane closures during peak hours to the extent possible. ○ Usage of haul routes minimizing truck traffic on local roadways to the extent possible. ○ Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction. ○ Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones. ○ Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures.	the Project substantially conforms to this mitigation measure because emergency access to the site would be provided by the existing street system, and the Project is designed and would be constructed in accordance with City of Redlands requirements to ensure proper emergency access. In addition, the Applicant will submit a parking and driveway plan for review by the City of Redlands staff and the Redlands Fire Department to ensure compliance with all applicable code-required site access and circulation requirements as well as code-required emergency access.

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	○ Storage of construction materials only in designated areas. ○ Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary. ○ Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities. ○ Enhance emergency preparedness awareness among public agencies and with the public at large.	
Tribal Cultural Resources		
Impact TCR-1: Cause a substantial adverse change in the significance of a tribal cultural resource defined in Public Resources Code section 21074 that is: a) 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 b) 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.	See **PMM CULT-1.** **PMM TCR-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria b) Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: protecting the cultural character and integrity of the resource; protecting the traditional use of the resource; and protecting the confidentiality of the resource; c) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places; and protecting the resource.	The Project substantially conforms to this mitigation measure. In compliance with AB 52 requirements, on April 8, 2022, the City sent letters to 5 Native American tribes that may have knowledge regarding tribal cultural resources in the Project vicinity. The San Manuel Band of Mission Indians consulted with the City via email regarding the proposed Project. The San Manuel Band of Mission Indians stated that the Project is within Serrano ancestral territory; however, due to the nature of the Project site, the Tribe does not have any concerns with the Project's implementation. Mitigation Measures TCR-1 has been included to require a Monitoring and Treatment Plan and Native American monitoring of excavation and grading activities should any cultural resources be discovered during Project construction activities.
Solid Waste		
Impact USSW-1: Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or	**PMM USSW-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the generation of solid waste, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:	The Project's impacts would be less than significant as a result of the implementation of regulatory requirements. Nevertheless, the Project substantially conforms to this mitigation measure because the Project would comply with the City of Redlands Municipal Code Chapter 15.16, which

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otherwise impair the attainment of solid waste reduction goals. **Impact USSW-2:** Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.	Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including, but not limited to the following: a) Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. b) Inclusion of a waste management plan that promotes maximum C&D diversion. c) Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.). d) Reuse of existing structure and shell in renovation projects. e) Development of indoor recycling program and space. f) Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities. g) Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and Connect SoCal policies can and should be required. h) Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 80 percent waste diversion target. i) Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices. j) Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities. k) Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts.	requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste, and AB 341 that requires diversion of a minimum of 75 percent of operational solid waste. Additionally, the proposed Project would be required comply with the City's Municipal Code Section 13.66.040, *Construction and Demolition Recycling Requirements*, which requires that no demolition permit or building permit shall be issued for any development activity subject to this chapter unless the construction and demolition recycling plan has been approved by the Facilities and Community Services Director.

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	l) Integrate reuse and recycling into residential industrial, institutional and commercial projects. m) Provide education and publicity about reducing waste and available recycling services. n) Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.	
Wastewater		
Impact USWW-1: Require or result in the relocation or construction of new or expanded wastewater treatment or storm drainage facilities, the construction or relocation of which could cause significant environmental effects.	See **PMM HYD-1.** **PMM USWW-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on utilities and service systems, particularly for construction of wastewater facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • During the design and CEQA review of individual future projects, implementing agencies and projects sponsors shall determine whether sufficient wastewater capacity exists for the proposed projects. There CEQA determinations must ensure that the proposed development can be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities.	The Project's impacts would be less than significant as a result of implementation of regulatory requirements. Nevertheless, the Project substantially conforms to this mitigation measure because most wastewater generated by sewered development within the Planning Area is treated at the Redlands Wastewater Treatment Facility. The Redlands Wastewater Treatment Facility treats approximately 6 million gallons per day (mgd) with a capacity of 9.5 mgd. As discussed in Section 6.3.19, *Utilities and Service Systems,* the Project would connect to existing water, wastewater, and storm drainage facilities, and would not require new or expanded wastewater treatment or storm drainage facilities. Furthermore, the Applicant would be required to pay Developer Impact Fees to offset any impacts to existing wastewater facilities.
Impact USWW-2: 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	See **PMM UWW-1.**	The Project's impacts would be less than significant as a result of implementation of regulatory requirements. Nevertheless, the Project substantially conforms to this mitigation measure because most wastewater generated by sewered development within the Planning Area is treated at the Redlands Wastewater Treatment Facility. The Redlands Wastewater Treatment Facility treats approximately 6 million gallons per day (mgd) with a capacity of 9.5 mgd. As

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addition to the provider's existing commitments.		discussed in Section 6.3.19, *Utilities and Service Systems,* the Project would generate approximately 17,645 gpd of wastewater per day. All new residential development that connects to the system is required to pay its applicable fair-share Development Impact Fee(s). As such, the Redlands Wastewater Treatment Facility would have adequate capacity to serve the Project.
Water Supply		
Impact USWS-1: Require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects.	**PMM USSW-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to ensure sufficient water supplies, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings, using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives. b) Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible. c) Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair. d) For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non-potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater onsite to tertiary standards and use it for non-potable uses onsite	The Project's impacts would be less than significant as a result of implementation of regulatory requirements. Nevertheless, the Project substantially conforms to this mitigation measure because the Project would connect to the existing water lines in the surrounding streets. The construction activities related to the onsite water infrastructure that would be needed to serve the proposed Project is included as part of the Project and would not result in any physical environmental effects beyond those identified throughout this SCEA. Additionally, the new onsite water system would convey water supplies to the proposed residences and landscaping through plumbing/landscaping fixtures that are compliant with the CalGreen Plumbing Code for efficient use of water. Furthermore, the Applicant would be required to pay Developer Impact Fees to offset any impacts to existing water facilities.
Impact USWS-2: Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.	See **PMM USWS-1.**	The Project's impacts would be less than significant. Nevertheless, the Project substantially conforms to this mitigation measure because the City has determined that the projected water supply available during normal, single-dry water years as included in the 25-year projection contained in its adopted 2020 Urban Water Management Plan can accommodate the projected water demand associated with the Project, in addition to the existing and planned future

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		development. Additionally, the Project would have a demand of 31.39 acre-feet per year, which is within the projected water demands and supplies as analyzed in the UWMP. In addition, all new residential development that connects to the system is required to pay its applicable fair-share Development Impact Fee(s).
Wildfire		
Impact WF-2: 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. **Impact HAZ-7:** Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	**PMM WF-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Launch fire prevention education for local cities and counties such that local fire agencies, homeowners, as well as commercial and industrial businesses are aware of potential sources of fire ignition and the related procedures to curb or lessen any activities that might initiate fire ignition. b) Ensure structures in high fire risk areas are built to current state and federal standards which serve to greatly increase the chances the structure will survive a wildfire and also allow for people to shelter-in-place. c) Improve road access for emergency response and evacuation so people can evacuate safely and timely when necessary. d) Improve, and educate regarding, local emergency communications and notifications with residents and businesses. e) Enforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures. f) Provide public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place g. Include external sprinklers with an independent water source to reduce flammability of structures. h. Include local solar power paired with batteries to reduce power flow in electricity lines.	The Project's impacts would be less than significant. Nevertheless, the Project substantially conforms to this mitigation measure because the Project is not located in a Fire Hazard Area that may contain substantial fire risk or a Very High Fire Hazard Severity Zone.

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	i. For developments in high fire-prone areas, have a fire protection plan for residents and businesses. j. Provide fire hazard and fire safety education for homeowners in or near fire hazard areas. k. Developments in fire-prone areas should have fire-resistant feature, such as: – Ember-resistant vents – Fire-resistant roofs – Surrounding defensible space – Proper maintenance and upkeep of structures and surrounding area	
Impact WF-3: 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 risks or that may result in temporary or ongoing impacts to the environment.	See **PMM HAZ-4.** **PMM WF-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) New development or infrastructure activity within very high hazard severity zones or SRAs shall be required to: 1) Submit a fire protection plan including the designation of fire watch staff; 2) Maintain water and other fire suppression equipment designated solely for firefighting on site for any construction and maintenance activities; 3) Locate construction and maintenance equipment in designated "safe areas" such that they do not discharge combustible materials; and 4) Designate trained fire watch staff during project construction to reduce risk of fire hazards.	The Project's impacts would be less than significant. Nevertheless, the Project substantially conforms to this mitigation measure because the Project is not located in a Fire Hazard Area that may contain substantial fire risk or a Very High Fire Hazard Severity Zone.
Impact WF-4: Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope stability, or drainage changes.	See **PMM WF-1**, **PMM WF-2**, **PMM HYD-1**, and **PMM HAZ-4.**	The Project's impacts would be less than significant. Nevertheless, the Project substantially conforms to this mitigation measure because the Project is not located in a Fire Hazard Area that may contain substantial fire risk or a Very High Fire Hazard Severity Zone. The City's General Plan Safety Element (Section 7.4) discusses Emergency Management, which outlines goals and policies aimed at

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		emergency preparedness to protect the health, safety and welfare of the general public during and after natural, man-made (technological), or attack-related emergencies. Additionally, the proposed Project does not include any characteristics (e.g., permanent road closures or long-term blocking of road access) that would substantially impair or otherwise conflict with an emergency response plan or emergency evacuation plan.

6 SUSTAINABLE COMMUNITIES ENVIRONMENTAL ANALYSIS/ INITIAL STUDY CHECKLIST

This section includes the completed environmental checklist form. The checklist form is used to assist in evaluating the potential environmental impacts of the proposed Project. The checklist form identifies potential Project effects as follows: 1) Potentially Significant Impact; 2) Less Than Significant with Mitigation Incorporated; 3) Less Than Significant Impact; and, 4) No Impact. Substantiation and clarification for each checklist response is provided in Section 5 (Environmental Evaluation). Included in the discussion for each topic are standard condition/regulations and mitigation measures, if necessary, that are recommended for implementation as part of the proposed Project.

6.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below (☒) would be potentially affected by this Project, involving at least one impact that is a "Potentially Significant Impact" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

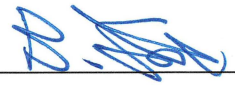
Environmental Factors Potentially Affected

☐	Aesthetics	☐	Agriculture and Forest Resources	☐	Air Quality
☒	Biological Resources	☒	Cultural Resources	☐	Energy
☒	Geology/Soils	☐	Greenhouse Gas Emissions	☐	Hazards and 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

6.2 DETERMINATION

(To be completed by the Lead Agency) on the basis of this initial evaluation

☐	I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
☐	I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
☐	I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	I find that the proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
☐	I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.
☒	I find that the proposed Project is a qualified "transit priority project" that satisfies the requirements of Sections 21155 and 21155.2 of the Public Resources Code (PRC), and/or qualified "residential or mixed use residential project" that satisfies section 21159.28(d) of the PRC, and although the Project could have a potentially significant effect on the environment, there will not be a significant effect in this case, because the SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT (SCEA) identifies measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the Project.



Signature

7/11/2022

Date

BRIAN FOOTE

Printed Name

JEAN REILLY

For

EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Potentially Significant Unless Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross-referenced).

5) Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063 (c)(3)(d). In this case, a brief discussion should identify the following:
   (a) Earlier Analysis Used. Identify and state where they are available for review.

   (b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   (c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The analysis of each issue should identify: (a) the significance criteria or threshold used to evaluate each question; and (b) the mitigation measure identified, if any, to reduce the impact to less than significance.

6.3 ENVIRONMENTAL CHECKLIST QUESTIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. Except as provided in Public Resources Code Section 21099 would the Project:				
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?	☐	☐	☒	☐

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

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-d) Less than Significant Impact. In 2013, the State of California enacted Senate Bill 743 (SB 743), which made several changes to the California Environmental Quality Action (CEQA) for projects located in areas served by transit. Specifically, Public Resources Code Section 21099 provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Public Resources Code Section 21099 defines a "transit priority area" as an area within one-half mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." Public Resources Code Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Public Resources Code Section 21099 defines an

infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds set forth in CEQA Guidelines Appendix G.

The Project would be a mixed-use, infill project located in a TPA. The Project includes development of an urban and developed site in Downtown Redlands. Public bus and rail transit is provided within the area of the Project site and the site is designated as a transit priority area and high quality transit area by the 2020-2045 RTP/SCS. The nearest rail station is the Arrow Line Downtown Redlands Station that is located approximately 0.26 mile north of the Project site. Furthermore, the Project would be subject to City of Redlands General Plan Action 2-A.35 that requires shielding of light to minimize lighting of adjacent off-site areas and generation of glare.

Thus, the Project's aesthetic (and parking) impacts are not considered significant on the environment pursuant to Public Resources Code Section 21099. Therefore, an assessment of the Project's potential aesthetic impacts is not required.

Existing Plans, Programs, or Policies

None.

Mitigation Measure

None.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
2. 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 Dept. 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:				
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 the 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) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The Project site was formerly developed with public/institutional uses and located in an urbanized area that is not used for agriculture. In addition, the Project site is designated as "Urban and Built-Up Land" on maps prepared pursuant to the California Department of Conservation Important Farmland Finder (CDC 2022). The Project site and adjacent areas are not designated as Prime, Unique, or Farmland of Statewide Importance. No areas of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would be affected by the Project or converted to a non-agricultural use. Thus, no impact would occur.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Williamson Act (California Land Conservation Act of 1965) restricts the use of agricultural and open space lands to farming and ranching by enabling local governments to contract with private landowners for indefinite terms in exchange for reduced property tax assessments. The Project site is zoned C-3. Therefore, rezoning and development of the site would not result in the loss of agricultural land or affect any Williamson Act contracts. In addition, no parcels in the Project vicinity have Williamson Act contracts. Therefore, implementation of the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and no impact would occur.

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))?

No Impact. As discussed previously, the Project site within an urbanized area and was previously developed with public/institutional uses. The Project site and vicinity is void of forest land or timberland. As described previously, the Project site is currently zoned for C-3 (General Commercial) District and is surrounded by areas zoned for commercial, residential, or public institution uses. No areas designated or zoned as forest land or timberland, or for timberland production, exist on or near the Project site. Thus, no impact would occur from implementation of the proposed Project.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The Project site contains offsite ornamental palm trees that would be replaced by the Project and does not include forestland or timberland. Additionally, the Project site is not zoned as forestland, and is surrounded by urban development on all sides. The Project would not conflict with existing zoning for, or cause rezoning of, forestland, timberland, or timberland zoned Timberland Production. No impact would occur.

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?

No Impact. As discussed previously, the Project site is in an urbanized mixed-use area of the City of Redlands and is fully disturbed based on former development of the site with public/institutional uses. It is currently not used for agricultural purposes and is not designed or zoned for forest land. The proposed Project would not convert farmland to a nonagricultural use or convert forest land to a non-forest use. Likewise, the proposed Project would not contribute to environmental changes that could result in conversion of farmland to a nonagricultural use or conversion of forest land to a non-forest use. Thus, no impact would occur.

Existing Plans, Programs, or Policies

None.

Mitigation Measure

None.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the Project:				
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) affecting a substantial number of people?	☐	☐	☒	☐

The discussion below is based on the City Center Air Quality Impact Analysis prepared by Urban Crossroads, included as Appendix A.

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The Project site is located in the South Coast Air Basin and is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD and the Southern California Association of Governments (SCAG) are responsible for preparing the Air Quality Management Plan (AQMP), which addresses federal and state Clean Air Act (CAA) requirements. The AQMP details goals, policies, and programs for improving air quality in the Basin. In preparation of the AQMP, SCAQMD and SCAG uses regional growth projections to forecast, inventory, and allocate regional emissions from land use and development-related sources. For purposes of analyzing consistency with the AQMP, if a proposed Project would result in growth that is substantially greater than what was anticipated, then the proposed Project would conflict with the AQMP. On the other hand, if a Project's density is within the anticipated growth of a jurisdiction, its emissions would be consistent with the assumptions in the AQMP, and the Project would not conflict with SCAQMD's attainment plans. In addition, the SCAQMD considers a Project consistent with the AQMP if the Project would not result in an increase in the frequency or severity of existing air quality violations or cause a new violation.

Furthermore, The South Coast Air Basin (SCAB) is in a non-attainment status for federal and state ozone standards and state and federal particulate matter standards. Any development in the SCAB, including the proposed Project, could cumulatively contribute to these pollutant violations. Should construction or operation of the proposed Project exceed these thresholds a significant impact could occur; however, if estimated emissions are less than the thresholds, impacts would be considered less than significant.

The proposed Project would develop the site with 131 multi-family residences and 10,550 SF of restaurant uses. As further described in Section 14, *Population and Housing*, the 131 new residences would result in 2

percent of the projected increase of residential units within the city. Furthermore, the development of the 10,550 SF of restaurant uses would result in the need for approximately 85 employees. This limited level of growth on within a developed area would not exceed growth projections and would be consistent with the assumptions in the AQMP. Additionally, as previously discussed within Section 4.2.1 of this SCEA, the proposed Project would be consistent with 2020-2045 RTP/SCS

In addition, as detailed below, the emissions generated by construction and operation of the proposed Project would not exceed thresholds, and the Project would not result in an increase in the frequency or severity of existing air quality violations or cause a new violation. Therefore, impacts related to conflict with the AQMP from the proposed Project would be less than significant.

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?

Less Than Significant Impact. The South Coast Air Basin (SCAB) is in a non-attainment status for federal and state ozone standards and state and federal particulate matter standards. Any development in the SCAB, including the proposed Project, could cumulatively contribute to these pollutant violations. Evaluation of cumulative air quality impacts of the proposed Project has been completed pursuant to SCAQMD's cumulative air quality impact methodology, SCAQMD states that if an individual project results in air emissions of criteria pollutants (ROG, CO, NOx, SOx, PM_{10}, and $PM_{2.5}$) that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of the criteria pollutant(s) for which the project region is in non-attainment under an applicable federal or state ambient air quality standard.

SCAQMD published its *Final Localized Significance Threshold Methodology* in July 2008, recommending that all air quality analyses include an assessment of both construction and operational impacts on the air quality of nearby sensitive receptors from emissions of CO, NO_X, PM_{10}, and $PM_{2.5}$. The methodologies from the SCAQMD CEQA Air Quality Handbook are used in evaluating Project impacts. SCAQMD has established daily mass thresholds for regional pollutant emissions, which are shown in Table AQ-1.

Table AQ-1: SCAQMD Regional Daily Emissions Thresholds

Pollutant	Construction (lbs/day)	Operations (lbs/day)
NOx	100	*55*
VOC	*75*	*55*
PM10	150	150
PM2.5	*55*	*55*
SOx	150	150
CO	*550*	*550*
Lead	3	3

Source: Urban Crossroads 2022 (Appendix A)

Construction

Construction activities associated with the proposed Project would generate pollutant emissions from the following: (1) site preparation, (2) grading, (3) building construction, (4) paving, and (5) architectural coating. The amount of emissions generated on a daily basis would vary, depending on the intensity and types of construction activities occurring.

It is mandatory for all construction projects to comply with several SCAQMD Rules, including Rule 403 for controlling fugitive dust, PM_{10}, and $PM_{2.5}$ emissions from construction activities. Rule 403 requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the proposed Project site, covering all trucks hauling soil with a fabric cover and maintaining a freeboard

height of 12-inches, and maintaining effective cover over exposed areas. Compliance with Rule 403 was accounted for in the construction emissions modeling and is included as PPP AQ-1. In addition, implementation of SCAQMD Rule 1113, which governs the VOC content in architectural coating, paint, thinners, and solvents was accounted for in construction emissions modeling, and is included as PPP AQ-2. As shown in Table AQ-2, CalEEMod results indicate that construction emissions generated by the proposed Project would not exceed SCAQMD regional thresholds with implementation of PPP AQ-1 and PPP AQ-2. Therefore, construction activities would result in a less than significant impact.

Table AQ-2: Project Construction Emissions and Regional Thresholds

Year	Emissions (lbs/day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Summer						
2023	5.00	48.80	39.60	0.15	8.98	5.07
2024	41.40	29.70	42.70	0.05	3.92	2.05
Winter						
2023	2.69	19.90	24.80	0.03	2.88	1.47
2024	41.40	29.90	39.40	0.05	3.92	2.05
Maximum Daily Emissions	**41.40**	**48.80**	**42.70**	**0.15**	**8.98**	**5.07**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: Urban Crossroads, 2022 (Appendix A)

Operation

Implementation of the proposed Project would result in long-term regional emissions of criteria air pollutants and ozone precursors associated with area sources, such as natural gas consumption, landscaping, applications of architectural coatings, and consumer products. Operational vehicular emissions would generate a majority of the emissions from implementation of the Project. In addition, compliance with SCAQMD Rule 445 that prohibits the use of wood burning stoves and fireplaces in new developments will also be included as PPP AQ-3 to ensure compliance.

Operational emissions associated with the proposed Project were modeled using CalEEMod and are presented in Table AQ-3. As shown, the proposed Project would result in long-term regional emissions of the criteria pollutants, however, these emissions would be below the SCAQMD's applicable thresholds. Therefore, the Project's operational emissions would not exceed the NAAQS and CAAQS, would not result in a cumulatively considerable net increase of any criteria pollutant, and impacts would be less than significant.

Table AQ-3: Project Operational Emissions and Regional Thresholds

Source	Emissions (lbs/day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Summer						
Area Source	24.20	10.20	97.10	0.23	7.71	1.49
Energy Source	4.45	2.27	10.70	0.01	0.18	0.18

Mobile Source	0.04	0.67	0.41	< 0.005	0.05	0.05
Total Maximum Daily Emissions	**28.69**	**13.14**	**108.21**	**0.24**	**7.94**	**1.72**
SCAQMD Regional Threshold	*55*	*550*	150	150	*550*	*55*
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
Winter						
Area Source	23.40	11.00	79.90	0.21	7.71	1.49
Energy Source	3.37	2.17	0.92	0.01	0.18	0.18
Mobile Source	0.04	0.67	0.41	< 0.005	0.05	0.05
Total Maximum Daily Emissions	**26.81**	**13.84**	**81.23**	**0.22**	**7.94**	**1.72**
SCAQMD Regional Threshold	*55*	*550*	150	150	*550*	*55*
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: Urban Crossroads, 2022 (Appendix A)

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. The SCAQMD's *Final Localized Significance Threshold Methodology* (SCAQMD 2008) recommends the evaluation of localized NO_2, CO, PM_{10}, and $PM_{2.5}$ construction-related impacts to sensitive receptors in the immediate vicinity of the Project site. Such an evaluation is referred to as a localized significance threshold (LST) analysis. According to the SCAQMD's *Final Localized Significance Threshold Methodology*, "off-site mobile emissions from the Project should not be included in the emissions compared to the LSTs" (SCAQMD 2008). SCAQMD has developed LSTs that represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards, and thus would not cause or contribute to localized air quality impacts. LSTs are developed based on the ambient concentrations of NOx, CO, PM_{10}, and $PM_{2.5}$ pollutants for each of the 38 source receptor areas (SRAs) in the SCAB. The City of Redlands is located within SCAQMD SRA 35.

Sensitive receptors can include residences, schools, playgrounds, childcare centers, athletic facilities. The nearest sensitive receptors are existing residences are located adjacent to the Project site. The distance between the Project site boundary and the closest existing residential structure is approximately 11-feet west of the Project site. The LST Methodology explicitly states that "It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters (82 feet) to the nearest receptor should use the LSTs for receptors located at 25 meters." As the existing residence is located less than 25-meters from the Project site, the 25-meter receptor distance is used for evaluation of localized impacts.

Construction

Construction of the proposed Project may expose nearby residential sensitive receptors to airborne particulates as well as a small quantity of construction equipment pollutants (i.e., usually diesel-fueled vehicles and equipment). However, construction contractors would be required to implement measures to reduce or eliminate emissions by following SCAQMD's standard construction practices (Rules 402 and 403, as included as PPP AQ-1 and PPP AQ-2). Rule 402 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off site. Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. As shown in Table AQ-4, Project construction-source emissions would not exceed the applicable SCAQMD LSTs.

Table AQ-4: Localized Significance Summary of Construction

Construction Activity	Year	Scenario	Emissions (lbs/day)			
			NO_X	CO	PM_{10}	$PM_{2.5}$
Site Preparation	2023	Summer	47.00	38.00	8.19	5.02
		Winter	0.64	0.52	0.11	0.07
		Maximum Daily Emissions	**47.00**	**38.00**	**8.19**	**5.02**
		SCAQMD Localized Threshold	220	1,625	11	7
		Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Grading	2023	Summer	25.40	21.60	3.77	2.31
		Winter	0.56	0.47	0.08	0.05
		Maximum Daily Emissions	**25.40**	**21.60**	**3.77**	**2.31**
		SCAQMD Localized Threshold	187	1,324	8	6
		Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

Source: Urban Crossroads, 2022 (Appendix A)

Operations

Operation of the proposed Project would include emissions from vehicles traveling to the Project site and from vehicles in the parking lots and loading areas. According to SCAQMD LST methodology, LSTs would apply to the operational phase of a proposed project, if the project includes stationary sources, or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., transfer facilities and warehouse buildings). The proposed Project does not include such uses, and thus, due to the lack of significant stationary source emissions, no long-term localized significance threshold analysis is needed. As such, impacts from operation of the Project to sensitive receptors would be less than significant.

CO Hot Spot Analysis

An adverse CO concentration, known as a "hot spot", would occur if an exceedance of the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur. In 2003, the SCAQMD estimated that a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a CO hot spot.

As detailed in Section 6.3.13, *Transportation*, in Table T-1, the proposed Project would generate 143 new vehicle trips (79 inbound trips and 64 outbound trips) during the weekday AM peak hour. During the weekday PM peak hour, the Project is expected to generate 133 new vehicle trips (74 inbound trips and 59 outbound trips). Over a 24-hour period, the Project is forecast to generate approximately 1,751 daily trip ends during a typical weekday. Thus, buildout of the proposed Project would not result in an increase in traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix and would not generate a CO hot spot. Therefore, impacts related to CO "hot spots" from operation of the proposed Project would be less than significant.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor issues include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting activities, refineries, landfills, dairies, and fiberglass molding operations. The proposed project would implement residential development within the project area. Residential uses do not involve the types of activities that would emit objectionable odors affecting a substantial number of people. In addition,

odors generated by new and existing non-residential land uses are required to be in compliance with SCAQMD Rule 402 to prevent odor nuisances on sensitive land uses. SCAQMD Rule 402, Nuisance, 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 construction, emissions from diesel equipment, use of volatile organic compounds from architectural coatings, and paving activities may generate some nuisance odors. However, these odors would be temporary and are not expected to affect a substantial number of people. Therefore, emission impacts relating to both operational and construction activity odors would be less than significant.

Existing Plans, Programs, or Policies

PPP AQ-1: Rule 403. All applicable measures included in Rule 403, shall be incorporated into Project plans and specifications as implementation of Rule 403, which include but are not limited to (1):

- All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions.
- The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are limited to 15 miles per hour or less.
- The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the mid-morning, afternoon, and after work is done for the day.

PPP AQ-2: Rule 1113. The following measures shall be incorporated into Project plans and specifications as implementation of SCAQMD Rule 1113 (2):

- Only "Low-Volatile Organic Compounds (VOC)" paints (no more than 50 gram/liter of VOC) consistent with SCAQMD Rule 1113 shall be used.

PPP AQ-3: Rule 445. The following measures shall be incorporated into Project plans and specifications as implementation of SCAQMD Rule 445 (3):

- Rule 445 prohibits the use of wood burning stoves and fireplaces in new developments.

Mitigation Measures

None.

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

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Less than Significant Impact with Mitigation Incorporated. The Project site is located in an urbanized and developed area of the city. The Project site is heavily disturbed, graded, and was previously fully developed with public/institutional uses. In its existing condition, the Project site contains non-native shrubs and grasses in few areas and offsite palm trees within the Brookside Avenue right-of-way. The existing trees on Brookside Avenue have the potential to provide habitat for nesting migratory birds. Many of these trees would be removed and replaced during construction. Therefore, the proposed Project has the potential to impact active bird nests if vegetation and trees are removed during the nesting season. Nesting birds are protected under

the federal Migratory Bird Treaty Act (MBTA) (United States Code Title 33, Section 703 et seq.; see also Code of Federal Regulations Title 50, Part 10) and Section 3503 of the California Fish and Game Code. Any activities that occur during the nesting/breeding season of birds protected by the federal Migratory Bird Treaty Act (MBTA), could result in a potentially significant impact if requirements of the MBTA are not followed. Therefore, implementation of MM BIO-1 would ensure MTBA compliance and would require a nesting bird survey to be conducted prior to the commencement of construction during nesting season, which would reduce potential impacts related to nesting avian species and native wildlife nursery sites to a less than significant level.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?

No Impact. Riparian habitats are those occurring along the banks of rivers and streams. Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies, known to provide habitat for sensitive animal or plant species, or known to be important wildlife corridors. As described above, the Project site is heavily disturbed, graded, and consists of mostly vacant land. According to the National Wetlands Inventory managed by the USFWS, the Project site does not contain riparian habitat (USFWS 2022). There are no riparian habitat or other sensitive natural communities as identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS. Therefore, no impact would occur.

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?

No Impact. Wetlands are defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as swamps, marshes, and bogs. As previously discussed, according to the National Wetlands Inventory managed by the USFWS, the Project site does not contain federally protected wetlands (USFWS 2022). In addition, the Project site does not contain any jurisdictional areas that would be subject to Section 404 of the Clean Water Act, and the proposed Project does not involve any hydrological interruption on any existing water resources. Therefore, the redevelopment of the Project site would not result in impacts to wetlands.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less than Significant Impact with Mitigation Incorporated. Wildlife corridors are linear features that connect areas of open space and provide avenues for the migration of animals and access to additional areas of foraging. The Project site does not contain, or is not adjacent to, any wildlife corridors. The Project site is surrounded by roadways and developed areas. Areas of commercial, residential, public institutional, and additional roadways are located beyond the roadways adjacent to the site. Development of the site would not result in impacts related to established native resident or migratory wildlife corridor.

As described previously, offsite areas contain ornamental vegetation that provides potentially suitable habitat for nesting birds. Therefore, if vegetation is required to be removed during nesting bird season, Mitigation Measure BIO-1 has been included to require a nesting bird survey to be conducted prior to vegetation removal. With the implementation of Mitigation Measure BIO-1, impacts related to native wildlife nursery sites would be reduced to a less than significant level.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less than Significant Impact. Chapter 12.52 of the City of Redlands's Municipal Code regulates trees and tree protection along streets and in public places. As part of the Project, existing trees around the perimeter of the Project site would be removed and replaced with a variety of trees and ornamental landscaping. The Project would be required obtain permits for tree removal and replacement within the Brookside Avenue public sidewalk. With compliance with Municipal Code Chapter 12.52, Project impacts to public trees would be less than significant.

In addition, the City General Plan outlines policies that protect biological resources; however, these policies pertain to ecological areas such as San Timoteo Canyon, Live Oak Canyon, the Crafton Hills, and the Santa Ana River, Mill Creek, and other riparian areas within the city. The Project site is in an urbanized area of the city and is not located in an area identified by the city as having ecological value. Therefore, implementation of the proposed Project would not conflict with any local policies or ordinances protecting biological resources, and impact would be less than significant.

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?

No Impact. The Project site is developed and within an urbanized area. The Project site is not located within the boundaries of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, implementation of the proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impact would occur.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

MM BIO-1: Pre-construction Nesting Bird Survey. Construction plans and Project specifications shall state that if construction or other Project activities are scheduled to occur during the bird breeding season (February through August for raptors and March through August for most migratory bird species), a pre-construction nesting bird survey shall be conducted by a qualified biologist to ensure that active bird nests, will not be disturbed or destroyed. The survey shall be completed no more than three days prior to initial ground disturbance. The nesting bird survey shall include the Project area and adjacent areas where proposed Project activities have the potential to affect active nests, either directly or indirectly due to construction activity or noise. If an active nest is identified, a qualified biologist shall establish an appropriate disturbance limit buffer around the nest using flagging or staking. Construction activities shall not occur within any disturbance limit buffer zones until the nest is deemed inactive by the qualified biologist.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
5. CULTURAL RESOURCES. Would the Project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in § 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?	☐	☐	☒	☐

The discussion below is based on the Architectural and Historical Significance Assessments of 212 or 216 Brookside Avenue, City of Redlands, San Bernardino County, prepared by Archaeological Associates, June 2018 (AA 2018), Appendix B; Preliminary Geotechnical Report, prepared by Hilltop Geotechnical, Inc., February 2018, Appendix C.

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Less than Significant Impact. According to the *State CEQA Guidelines*, a historical resource is defined as something that meets one or more of the following criteria: (1) listed in, or determined eligible for listing in, the California Register of Historical Resources; (2) listed in a local register of historical resources as defined in Public Resources Code (PRC) Section 5020.1(k); (3) identified as significant in a historical resources survey meeting the requirements of PRC Section 5024.1(g); or (4) determined to be a historical resource by the Project's Lead Agency. Implementation of the proposed Project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines, as there are no eligible historical resources on the Project site.

The California Register of Historical Resources defines a "historical resource" as a resource that meets one or more of the following criteria: (1) associated with events that have made a significant contribution to the broad patterns or local or regional history of the cultural heritage of California or the United States; (2) associated with the lives of persons important to local, California, or national history; (3) embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic values; or (4) has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

In addition, Section 2.62 of the Redlands Municipal Code states that a structure with aesthetics, architectural, historical value which is 50 years old or older may be designated as a Historic Resource. A structure with exceptional esthetics, architectural, or historical value may be designated as a Landmark Resource. The criteria, any one of which may be used to determine such designation, are as follows:

A. It [a nominated resource] has significant character, interest, or value as part of the development, heritage or cultural characteristics of the city of Redlands, state of California, or the United States;

B. It is the site of a significant historic event;

C. It is strongly identified with a person or persons who significantly contributed to the culture, history or development of the city;

D. It is one of the few remaining examples in the city possessing distinguishing characteristics of an architectural type or specimen;

E. It is a notable work of an architect or master builder whose individual work has significantly influenced the development of the city;

F. It embodies elements of architectural design, detail, materials, or craftsmanship that represents a significant architectural innovation;

G. It has a unique location or singular physical characteristics representing an established and familiar visual feature of a neighborhood, community, or the city;

H. It has unique design or detailing;

I. It is a particularly good example of a period or style;

J. It contributes to the historical or scenic heritage or historical or scenic properties of the city (to include, but not be limited to, landscaping, light standards, trees, curbings, and signs);

K. It is located within a historic and scenic or urban conservation district, being a geographically definable area possessing a concentration of historic or scenic properties which contribute to each other and are unified aesthetically by plan or physical development.

The Project site is currently vacant and undeveloped. The Project site was formerly developed with the City of Redlands Safety Hall and San Bernardino County Branch Building. Both buildings were demolished in 2018. Therefore, there are no buildings onsite which could qualify as a historic resource pursuant to CEQA. Based on the records search result conducted for the Project site, the site does not contain any known historical resources and is not directly adjacent to any known historical resources (AA 2018). As such, the Project would not cause a substantial adverse change to a historical resource, and impacts would be less than significant.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less than Significant Impact with Mitigation Incorporated. The records search conducted for the Project site indicated that there are no known cultural resources within the Project site (AA 2018). The Phase I ESAs prepared for the Project site include aerial photographs that detail that the site was used for commercial uses and public/institutional uses since 1925. The Preliminary Geotechnical Investigation conducted for the Project site describes that onsite testing identified artificial fill soils of seven feet in depth across the site.

Project construction would include overexcavation to a depth of at least 11 feet below ground surface (bgs) as part of development of the proposed building foundations. Project grading has the potential to encroach into native soils that have not been previously disturbed and could contain archaeological resources. As such, Mitigation Measure CUL-1 requires retention of an archaeologist that would observe ground disturbing activities and recover archaeological resources as necessary. In addition, the archaeologist would be present at the pre-grading conference to establish procedures for archeological resource surveillance. Mitigation CUL-1would also halt work within 50 feet of a find until it can be evaluated by the qualified on-call archaeologist. Construction activities could continue in other areas. If the discovery proves to be significant, additional work, such as data recovery excavation, may be warranted and shall be discussed in consultation with the appropriate regulatory agency(ies). With implementation of Mitigation Measure CUL-1, impacts related to archaeological resources would be less than significant.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant Impact. The Project site has been previously disturbed, as described above, and has not been previously used as a cemetery. It is not anticipated that implementation of the proposed Project would result in the disturbance of human remains. In addition, compliance with California Health and Safety

Code Section 7050.5, CEQA Section 15064.5, and Public Resources Code Section 5097.98, mandate the process to be followed in the event of an accidental discovery of any human remains. Specifically, California Health and Safety Code Section 7050.5 requires that if human remains are discovered, disturbance of the site shall remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of death, and made recommendations concerning the treatment and disposition of the human remains to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. If the coroner determines that the remains are not subject to his or her authority and if the coroner has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Compliance with existing law, included as PPP CUL-1, would ensure that impacts to human remains would be less than significant.

Existing Plans, Programs, or Policies

PPP CUL-1: Human Remains. Should human remains be discovered during project construction, the project will be required to comply with State Health and Safety Code Section 7050.5, which states that no further disturbance may occur in the vicinity of the body until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission, which will determine the identity of and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD must complete the inspection within 48 hours of notification by the NAHC.

Mitigation Measures

MM CUL-1: **Archaeological Monitoring.** The Applicant shall retain a qualified archaeologist to perform archaeological monitoring and the archaeologist shall be present during initial ground-disturbing activities (e.g., site preparation, demolition of historic structures, and grading up to ten feet below surface) to identify and assess any known or suspected archaeological and/or cultural resource. The qualified archaeologist shall develop a Cultural Resources Management Plan to address the details, timing, and responsibility of all archaeological and cultural resource activities that occur on the Project site. The plan shall include a scope of work, project grading and development scheduling, pre-construction meeting (with consultants, contractors, and monitors), a monitoring schedule during all initial ground-disturbance related activities, safety requirements, and protocols to follow in the event of previously unknown cultural resources discoveries that could be subject to a cultural resources evaluation. The plan shall be submitted to the City and the Consulting Tribe(s) for review and comment, prior to final approval by the City. The Monitoring and Treatment Plan shall incorporate the components described in Mitigation Measure TCR-1.

In the event that cultural resources are discovered during Project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and the qualified archaeologist shall assess the find. Work on the other portions of the Project outside the buffered area may continue during the assessment period. Additionally, the San Manuel Band of Mission Indians shall be contacted, as detailed within Mitigation Measure TCR-1, regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes their initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.

If significant pre-contact and/or historic-era cultural resources, as defined by CEQA, are discovered and avoidance cannot be ensured, the archaeologist shall follow the stipulations of the Monitoring and Treatment Plan. If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a

100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the Project.

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

The discussion below is based on the City Center Energy Tables, prepared by Urban Crossroads, included as Appendix C.

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than Significant Impact.

Construction

During construction of the proposed Project would consume energy in three general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment on the Project sites, construction worker travel to and from the project site, as well as delivery truck trips;
2. Electricity associated with providing temporary power for lighting and electric equipment; and
3. Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Construction activities related to the proposed mixed-use development and the associated infrastructure is not expected to result in demand for fuel greater on a per-unit-of-development basis than other development projects in Southern California. Table E-1 details the construction fuel usage over the Project's 1-year construction period. As shown in Table E-1, Project construction would require the consumption of 54,473 gallons of diesel fuel.

Table E-1: Construction Equipment Fuel Consumption Estimates

Construction Activity	Duration (Days)	Equipment	HP Rating	Quantity	Usage Hours	Load Factor	HP-hrs/day	Total Fuel Consumption
Site Preparation	5	Crawler Tractors	87.0	4.00	8.00	0.43	1,197	324
		Rubber Tired Dozers	367	3.00	8.00	0.40	3,523	952
Grading	8	Crawler Tractors	87.0	3.00	8.00	0.43	898	388
		Excavators	36.0	1.00	8.00	0.38	109	47
		Graders	148	1.00	8.00	0.41	485	210
		Rubber Tired Dozers	367	1.00	8.00	0.40	1,174	508
Building Construction	390	Cranes	367	1.00	8.00	0.29	851	17,949
		Crawler Tractors	87.0	3.00	8.00	0.43	898	18,927

		Forklifts	82.0	3.00	8.00	0.20	394	8,298
		Generator Sets	14.0	1.00	8.00	0.74	83	1,747
		Welders	46.0	1.00	8.00	0.45	166	3,491
Paving	18	Cement and Mortar Mixers	10.0	2.00	8.00	0.56	90	87
		Crawler Tractors	87.0	1.00	8.00	0.43	299	291
		Pavers	81.0	1.00	8.00	0.42	272	265
		Paving Equipment	89.0	2.00	8.00	0.36	513	499
		Rollers	36.0	2.00	8.00	0.38	219	213
Architectural Coating	36	Air Compressors	37.0	1.00	8.00	0.48	142	276
							CONSTRUCTION FUEL DEMAND (GALLONS DIESEL FUEL)	***54,473***

Source: Urban Crossroads, 2022 (Appendix C)

Table E-2 shows the energy consumption for construction worker light-duty auto (LDA) vehicles. As shown, construction worker LDAs would consume 14,087 gallons of gasoline.

Table E-2: Construction Worker Fuel Consumption Estimates (LDA)

Construction Activity	Duration (Days)	Worker Trips/ Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
2023						
Site Preparation	5	9	18.5	833	30.68	27
Grading	8	8	18.5	1,184	30.68	39
Building Construction	181	59	18.5	197,562	30.68	6,438
2024						
Building Construction	209	59	18.5	228,124	31.57	7,225
Paving	18	10	18.5	3,330	31.57	105
Architectural Coating	36	12	18.5	7,992	31.57	253
TOTAL CONSTRUCTION WORKER (LDA) FUEL CONSUMPTION						***14,087***

Source: Urban Crossroads, 2022 (Appendix C)

Table E-3 and E-4 show the energy consumption for construction worker light-duty-trucks (LDT). As shown, construction worker LDT-1s would require 9,153 gallons of fuel and LDT-2s would require 9,226 gallons of fuel.

Table E-3: Construction Worker Fuel Consumption Estimates (LDT1)

Construction Activity	Duration (Days)	Worker Trips / Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
2023						
Site Preparation	5	5	18.5	463	24.14	19
Grading	8	4	18.5	592	24.14	25
Building Construction	181	30	18.5	100,455	24.14	4,162

2024						
Building Construction	209	30	18.5	115,995	24.59	4,717
Paving	18	5	18.5	1,665	24.59	68
Architectural Coating	36	6	18.5	3,996	24.59	162
TOTAL CONSTRUCTION WORKER (LDT1) FUEL CONSUMPTION						***9,153***

Source: Urban Crossroads, 2022 (Appendix C)

Table E-4: Construction Worker Fuel Consumption Estimates (LDT2)

Construction Activity	Duration (Days)	Worker Trips / Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
2023						
Site Preparation	5	5	18.5	463	23.82	19
Grading	8	4	18.5	592	23.82	25
Building Construction	181	30	18.5	100,455	23.82	4,218
2024						
Building Construction	209	30	18.5	115,995	24.51	4,733
Paving	18	5	18.5	1,665	24.51	68
Architectural Coating	36	6	18.5	3,996	24.51	163
TOTAL CONSTRUCTION WORKER (LDT1) FUEL CONSUMPTION						***9,226***

Source: Urban Crossroads, 2022 (Appendix C)

Tables E-5 shows the fuel consumption by medium-heavy duty (MHDT) and heavy-heavy duty (HHDT) vendor and hauling vehicle trips during various construction phases of the Project.

Table E-5: Construction Vendor Fuel Consumption Estimates (MHDT & HHDT)

Year	Construction Activity	Duration (Days)	Vendor/ Hauling Trips/Day	Trip Length (miles)	VMT	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
2023	MHDT						
	Site Preparation	5	1	10.2	51	8.30	6
	Grading	8	1	10.2	82	8.30	10
	Building Construction	181	11	10.2	20,308	8.30	2,448
	HHDT (Vendor)						
	Site Preparation	5	1	10.2	51	5.94	9
	Grading	8	1	10.2	82	5.94	14
	Building Construction	181	11	10.2	20,308	5.94	3,418
	HHDT (Hauling)						
	Grading	8	34	20	5,440	5.94	916
2024	MHDT						
	Building Construction	209	11	10.2	23,450	8.34	2,811

	HHDT (Vendor)						
	Building Construction	209	11	10.2	23,450	6.03	3,892
TOTAL CONSTRUCTION VENDOR/HAULING FUEL CONSUMPTION							***13,523***

Source: Urban Crossroads, 2022 (Appendix C)

Construction of the Project would result in fuel consumption from the use of construction tools and equipment, vendor and haul truck trips, and vehicle trips generated from construction workers traveling to and from the site. There are no unusual Project characteristics that would cause the use of construction equipment that would be less energy efficient compared with other similar construction sites in other parts of the State. Therefore, construction-related fuel consumption by the Project would not result in inefficient, wasteful, or unnecessary energy use compared with other construction sites in the region, and impacts would be less than significant.

Operation

Once operational, the Project would generate demand for electricity, natural gas, as well as gasoline for fuel tanks. Operational use of energy includes the heating, cooling, and lighting of the building, water heating, operation of electrical systems and plug-in appliances, parking lot and outdoor lighting, and the transport of electricity, natural gas, and water to the areas where they would be consumed. This use of energy is typical for urban development, and no operational activities or land uses would occur that would result in extraordinary energy consumption.

The State of California provides a minimum standard for building design and construction standards through Title 24 of the California Code of Regulations (CCR). Compliance with Title 24 is mandatory at the time new building permits are issued by local governments. The City's administration of the Title 24 requirements includes review of design components and energy conservation measures that occurs during the permitting process, which ensures that all requirements are met. Typical Title 24 measures include insulation; use of energy-efficient heating, ventilation and air conditioning equipment (HVAC); solar panels on each residential building; energy-efficient indoor and outdoor lighting systems; reclamation of heat rejection from refrigeration equipment to generate hot water; and incorporation of skylights, etc. In complying with the Title 24 standards, impacts to peak energy usage periods would be minimized, and impacts on statewide and regional energy needs would be reduced. Thus, operation of the Project would not use large amounts of energy or fuel in a wasteful manner, and no operational energy impacts would occur. As detailed in Table E-6, vehicles and trucks traveling to and from the operational Project site would consume 260,203 gallons of fuel.

Table E-6: Total Project-generated Traffic Annual Fuel Consumption

Vehicle Type	**Average Vehicle Fuel Economy** (mpg)	**Annual VMT**	**Estimated Annual Fuel Consumption** (gallons)
LDA	31.57	3,079,771	97,543
LDT1	24.59	255,605	10,394
LDT2	24.51	1,226,330	50,042
MDV	19.97	947,476	47,453
LHDT1	15.81	179,062	11,323
LHDT2	14.97	48,328	3,229
MHDT	8.34	104,185	12,490
HHDT	6.03	104,853	17,402
OBUS	6.15	3,843	625
UBUS	4.86	1,940	399

MCY	41.98	129,861	3,093
SBUS	6.43	6,709	1,044
MH	5.74	29,652	5,164
TOTAL ANNUAL FUEL CONSUMPTION		***6,117,613***	***260,203***

MDV = Medium Duty Trucks; LHDT1 = Light-Duty Trucks (Vehicles under the LHDT1 category have a GVWR of 8,501 to 10,000 lbs.); LHDT2 = Light-Duty Trucks (Vehicles under the LHDT2 category have a GVWR of 10,001 to 14,000 lbs.); OBUS = Other Buses; UBUS = Urban Buses; MCY = Motorcycle; SBUS = School Bus; MH = Motorhome
Source: Urban Crossroads, 2022 (Appendix C)

As shown in Table E-7, the Project would result in an annual natural gas demand of 2,586,459 thousand British thermal units (kBTU) of natural gas, and approximately 916,881 kilowatt-hour (kWh) of electricity.

Table E-7: Project Annual Operational Energy Demand Summary

Land Use	**Natural Gas Demand** (kBTU/year)	**Electricity Demand** (kWh/year)
Apartments Mid Rise	1,445,871	565,417
High Turnover (Sit Down Restaurant)	1,140,588	350,667
Enclosed Parking with Elevator	0	797
Landscape	0	0
Other Asphalt Surfaces	0	0
TOTAL PROJECT ENERGY DEMAND	***2,586,459***	***916,881***

Source: Urban Crossroads, 2022 (Appendix C)

As such, Project construction and operations would not result in the inefficient, wasteful, or unnecessary consumption of energy. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. Therefore, impacts would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less than Significant Impact. As previously discussed, the City of the Redlands Municipal Code Chapter 15.18 requires that all new residential development comply with the California Green Building Standards, Title 24, Part 11 (CalGreen). CALGreen Code includes provisions related to insulation and design aimed at minimizing energy consumption. In addition, the proposed Project would be consistent with applicable plans related to renewable energy and energy efficiency, including the implementation of solar energy. Implementation of the requirements are ensured through the City's development permitting process. As such, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would not occur.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

None.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
7. GEOLOGY AND SOILS. 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 18-1-B of the Uniform 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 waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

The discussion below is based on the Report of Preliminary Geotechnical/Geologic Study & Infiltrometer Testing, prepared by Hilltop Geotechnical, Inc., February 12, 2018 (Hilltop 2018) included as Appendix D.

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?

No Impact. In 1972, the Alquist-Priolo Special Studies Zones Act was signed into law and renamed the Alquist-Priolo Earthquake Fault Zoning Act (A-P Act) in 1994. The primary purpose of the Act is to mitigate the hazard of fault rupture by prohibiting the location of structures for human occupancy access the trace of an active fault. The A-P Act requires the State Geologist (Chief of the California Geology Survey) to delineate "Earthquake Fault Zones" along with faults that are "sufficiently active" and "well-defined." The boundary of an "Earthquake Fault Zone" is generally about 500 feet from major active faults and 200 to 300 feet from well-defined minor faults. The A-P Act dictates that cities and counties withhold development permits for sites within an Alquist-Priolo Earthquake Zone until geologic investigations demonstrate that the site zones are not threatened by surface displacements from future faulting.

The Project site does not contain and is not in the vicinity of an earthquake fault, is not affected by a state-designated Alquist-Priolo Earthquake Fault Zone. The closest active faults are the San Andreas Fault, which is located approximately 5.2 miles northeast of the site, and the San Jacinto Fault, which is located approximately 4.5 miles southwest of the site. Accordingly, the potential for ground rupture at the site is considered low. Thus, the proposed Project would not expose people or structures to potential substantial adverse effects from rupture of a known earthquake fault that is delineated on an Alquist-Priolo Earthquake Fault Zoning Map, and impacts would not occur.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project site is located within a seismically active region of Southern California. As mentioned previously, the San Andreas Fault is located approximately 5.2 northeast of the Project site and the San Jacinto Fault is located approximately 4.5 miles southwest of the Project site. Thus, moderate to strong ground shaking can be expected at the site. The amount of motion can vary depending upon the distance to the fault, the magnitude of the earthquake, and the local geology. Greater movement can be expected at sites located closer to an earthquake epicenter, that consists of poorly consolidated material such as alluvium, and in response to an earthquake of great magnitude.

Structures built in the City are required to be built in compliance with the California Building Code (CBC [California Code of Regulations, Title 24, Part 2]), included in the Municipal Code as Chapter 15.04. In addition, PPP GEO-1 has been included to provide provisions for earthquake safety based on factors including occupancy type, the types of soils onsite, and the probable strength of the ground motion. Compliance with the CBC would include the incorporation of: 1) seismic safety features to minimize the potential for significant effects as a result of earthquakes; 2) proper building footings and foundations; and 3) construction of the building structures so that it would withstand the effects of strong ground shaking. Because the proposed Project would be constructed in compliance with the CBC, the proposed Project would result in a less than significant impact related to strong seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Soil liquefaction is a phenomenon in which saturated, cohesionless soils layers, located within approximately 50 feet of the ground surface, lose strength due to cyclic pore water pressure generation from seismic shaking or other large cyclic loading. During the loss of stress, the soil acquires "mobility" sufficient to permit both horizontal and vertical movements. Soil properties and soil conditions such as type, age, texture, color, and consistency, along with historical depths to ground water are used to identify, characterize, and correlate liquefaction susceptible soils.

Soils that are most susceptible to liquefaction are clean, loose, saturated, and uniformly graded fine-grained

sands that lie below the groundwater table within approximately 50 feet below ground surface. Lateral spreading is a form of seismic ground failure due to liquefaction in a subsurface layer.

According to Redlands General Plan Figure 7-6, the Project site is not located in an area mapped for liquefaction susceptibility; therefore, the potential for liquefaction to occur is low. Additionally, as discussed in the Report of Preliminary Geotechnical, historic groundwater levels are approximately 75 feet below ground surface. Compliance with the CBC, included as PPP GEO-1, would require specific engineering design recommendations be incorporated into grading plans and building specifications as a condition of construction permit approval to ensure that project structures would withstand the effects of seismic ground movement, including liquefaction and settlement. Compliance with the requirements of the CBC and City's Municipal Code for structural safety (included as PPP GEO-1) would reduce hazards from seismic-related ground failure, including liquefaction and settlement to a less than significant level.

iv. Landslides?

No Impact. Landslides and other slope failures are secondary seismic effects that are common during or soon after earthquakes. Areas that are most susceptible to earthquakes induced landslides are steep slopes underlain by loose, weak soils, and areas on or adjacent to existing landslide deposits.

As described above, the Project site is located in a seismically active region subject to strong ground shaking. However, the site is located in a relatively flat and developed area. According to the Redlands General Plan Figure 7-6, the Project site is not located in an area mapped for landslide risk. Therefore, the Project would not cause potential substantial adverse effects related to slope instability or seismically induced landslides.

b) Result in soil erosion or the loss of topsoil?

Less Than Significant Impact. In its existing condition, the Project site is disturbed and vacant. The Project would involve the construction of a mixed-use development on the Project site. During construction activities, soil would be exposed and there would be an increased potential for soil erosion compared to existing conditions. Additionally, during a storm event, soil erosion could occur at an accelerated rate. The increased erosion potential could result in short-term water quality impacts.

As discussed in further detail in Section 10, *Hydrology and Water Quality*, the proposed Project would increase the impervious surface area on the Project site compared to existing conditions. This would change the volume of stormwater runoff generated from the Project site. However, since the Project site is relatively flat, soil erosion would be controlled via implementation of standard erosion control practices required by a Stormwater Pollution Prevention Plan (SWPPP) during construction (included as PPP WQ-1). Furthermore, the Project would implement SCAQMD Rule 403 (included as PPP AQ-1), which would limit wind erosion during Project construction.

Once developed, the Project's implementation would not increase the volume of runoff from the Project site because the proposed Project would include landscaped pervious surfaces intended to capture stormwater runoff, as well as new drainage infrastructure designed to accommodate the increase in stormwater runoff, which is further described in Section 10, *Hydrology and Water Quality*. In addition, implementation of the project requires City approval of a site-specific Water Quality Management Plan (WQMP), which would ensure that the City's Municipal Code, RWQCB requirements, and appropriate operational BMPs would be implemented to minimize or eliminate the potential for soil erosion or loss of topsoil to occur. As a result, potential impacts related to substantial soil erosion or loss of topsoil would be less than significant.

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 offsite landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant Impact. As described above, the Project site is relatively level, and does not contain

nor is adjacent to any significant slope or hillside area. The Project would not create slopes. Thus, on or off-site landslides would not occur from implementation of the Project.

Lateral spreading, a phenomenon associated with seismically induced soil liquefaction, is a display of lateral displacement of soils due to inertial motion and lack of lateral support during or post liquefaction. It is typically exemplified by the formation of vertical cracks on the surface of liquefied soils, and usually takes place on gently sloping ground or level ground with nearby free surface such as drainage or stream channel. According to the Report of Preliminary Geotechnical for the proposed Project, the depth of groundwater is anticipated to be at a depth of 75 feet or greater; therefore, lateral spreading is not considered a geotechnical hazard for the Project (Hilltop, 2018). Thus, the soils are not susceptible to lateral spreading and impacts related to liquefaction and lateral spreading would be less than significant.

Differential settlement or subsidence could occur if buildings or other improvements are built on low-strength foundation materials (including imported fill) or if improvements straddle the boundary between different types of subsurface materials (e.g., a boundary between native material and fill). Although differential settlement generally occurs slowly enough that its effects are not dangerous to inhabitants, it can cause building damage over time. Soils susceptible to seismically induced settlement typically include loose, granular materials.

With implementation of the requirements of the CBC, as included as PPP GEO-1, the potential for settlement or collapse of soils is considered low (Hilltop, 2018). Therefore, compliance with the requirements of the CBC as identified in the site geotechnical design recommendations that would be reviewed by the City for appropriate inclusion, as part of the building plan check and development review process, would reduce potential impacts related to ground collapse to a less than significant level.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. Expansive soils contain certain types of clay minerals that shrink or well as the moisture content changes; the shrinking or swelling can shift, crack, or break structures built on such soils. Arid or semiarid areas with seasonal changes of soil moisture experiences, such as southern California, have a higher potential of expansive soils than areas with higher rainfall and more constant soil moisture.

The Report of Preliminary Geotechnical performed an evaluation of the potential for expansive soils at the site and expansion index testing was performed on representative samples of the near surface soils which are anticipated to be within the zone of influence of the planned improvements. The report found that the site has approximately 5 to 7 feet of fill material across the majority of the site. As discussed in the Report of Preliminary Geotechnical, all onsite soils and engineered fill soils would be required to meet CBC expansion index requirements, included as PPP GEO-1. As required by PPP GEO-1, specific engineering design recommendations would be incorporated into grading plans and building specifications as a condition of construction permit approval to ensure that Project structures would withstand the effects of related to ground movement, including expansive soils. Thus, impacts related to expansive soils would be less than significant.

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?

No Impact. The Project would not use septic tanks or alternative methods for disposal of wastewater into subsurface soils. Furthermore, the proposed Project would connect to existing public wastewater infrastructure. Therefore, the Project would not result in any impacts related to septic tanks or alternative wastewater disposal methods.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant with Mitigation Incorporated. As mentioned previously, the proposed Project is located on a previously disturbed site within an urbanized area of the City of Redlands. As discussed in the Report of Preliminary Geotechnical, the site soils consist of younger and older surficial deposits, more specifically very young wash deposits, active (Qvyw) and very old axial-valley deposits, Unit 3 (Qvoa3).

Very young surficial deposits are the result of recently transported and deposited sediment into channels and washes on surfaces of alluvial fans, alluvial plains, and on hill slopes. Very old surficial deposits are sedimentary units that are moderately to well consolidated to lithified, and moderately to well dissected. Valley-filling deposits (Qvoa series) are dominated by sand with minor gravel alluvial deposits and includes residuum or pedogenic-soil profile developed on the San Timoteo Formation beds. The San Timoteo Badlands area and the western portion of the City of Redlands have a high potential to produce significant paleontological resources.

Records of vertebrate fossil localities have been found in other local sedimentary deposits similar to those that occur on the Project site. Previous finds include a vertebrate fossil locality from somewhat similar deposits is located approximately 8 to 10 miles south of the Project site. The locality came from the San Timoteo Formation and consisted of vertebrates belonging to the horse and camel family at an unknown depth. Additional literature was consulted, including The University of California Museum of Paleontology (UCMP)'s Miocene Mammal Mapping Project (MioMap), resulting in eight fossil localities from the San Timoteo Formation located approximately five miles south-southeast of the Project site.

Therefore, Project related excavations that extend down into older Quaternary deposits may encounter fossil vertebrates. As a result, Mitigation Measure PAL-1 is included to require that any substantial excavations below three feet be monitored to identify and recover any significant fossil remains. With implementation of Mitigation Measure PAL-1, impacts to paleontological resources would be less than significant.

Existing Plans, Programs, or Policies

PPP GEO-1: **California Building Code.** The Project is required to comply with the California Building Code as included in the City's Municipal Code Chapter 15.04 to preclude significant adverse effects associated with seismic hazards. California Building Code related and geologist and/or civil engineer specifications for the Project are required to be incorporated into grading plans and specifications as a condition of Project approval.

PPP WQ-1: **SWPPP.** As listed below in Section 10, *Hydrology and Water Quality*.

Mitigation Measures

MM PAL-1: **Paleontological Resources.** Prior to the issuance of the first grading permit, the applicant shall provide a letter to the City of Redlands Planning Department, or designee, from a qualified professional paleontologist pursuant to the 2010 Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources by the Society for Vertebrate Paleontology, stating that the paleontologist has been retained to provide services for the project. The paleontologist shall develop a Paleontological Resources Impact Mitigation Plan (PRIMP) to mitigate the potential impacts to unknown buried paleontological resources that may exist onsite for the review and approval by the City. The PRIMP shall require that the paleontologist be present at the pre-grading conference to establish procedures for paleontological resource surveillance. The PRIMP shall also require paleontological monitoring pursuant to the 2010 Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources by the Society for Vertebrate Paleontology for ground disturbing activities greater than five feet in depth within native soil, as determined by the Project paleontologist.

In the event paleontological resources are encountered, ground-disturbing activity within 50 feet of the area of the discovery shall cease. The paleontologist shall examine the materials encountered, assess the nature and extent of the find, and recommend a course of action to further investigate and protect or recover and salvage those resources that have been encountered.

Criteria for discard of specific fossil specimens will be made explicit. If a qualified paleontologist determines that impacts to a sample containing significant paleontological resources cannot be avoided by project planning, then recovery may be applied. Actions may include recovering a sample of the fossiliferous material prior to construction, monitoring work and halting construction if an important fossil needs to be recovered, and/or cleaning, identifying, and cataloging specimens for curation and research purposes. Recovery, salvage and treatment shall be done at the Applicant's expense. All recovered and salvaged resources shall be prepared to the point of identification and permanent preservation by the paleontologist. Resources shall be identified and curated into an established accredited professional repository. The paleontologist shall have a repository agreement in hand prior to initiating recovery of the resource.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
8. GREENHOUSE GAS EMISSIONS. 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 purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

The discussion below is based on the City Center Greenhouse Gas Analysis, prepared by Urban Crossroads, included as Appendix E.

Technical Background

Constituent gases of the Earth's atmosphere, called atmospheric greenhouse gases (GHGs), play a critical role in the Earth's radiation amount by trapping infrared radiation from the Earth's surface, which otherwise would have escaped to space. Prominent greenhouse gases contributing to this process include carbon dioxide (CO_2), methane (CH_4), ozone (O_3), water vapor, nitrous oxide (N_2O), and chlorofluorocarbons (CFCs). This phenomenon, known as the Greenhouse Effect, is responsible for maintaining a habitable climate. Anthropogenic (caused or produced by humans) emissions of these greenhouse gases in excess of natural ambient concentrations are responsible for the enhancement of the Greenhouse Effect and have led to a trend of unnatural warming of the Earth's natural climate, known as global warming or climate change. Emissions of gases that induce global warming are attributable to human activities associated with industrial/manufacturing, agriculture, utilities, transportation, and residential land uses.

Section 15364.5 of the California Code of Regulations defines GHGs to include carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride[1]. Emissions of CO_2 and N_2O are byproducts of fossil fuel combustion. Methane, a potent greenhouse gas, results from off-gassing associated with agricultural practices and landfills. Sinks of CO_2, where CO_2 is stored outside of the atmosphere, include uptake by vegetation and dissolution into the ocean.

California has passed several bills and the Governor has signed at least three executive orders regarding greenhouse gases. These regulations require the use of alternative energy, such as solar power. The California Energy Commission passed a measure as an update to the state's 2019 Title 24, Part 6, Building Energy Efficiency Standards, which requires that all new homes under three stories high install solar panels starting January 1, 2020, and that solar systems must be sized to net out the annual kilowatt-hour energy usage of the dwelling[2]. All new residential projects under three stories, including the proposed project, are required to comply with these new standards.

GHG Thresholds

The City of Redlands has an adopted Climate Action Plan (CAP), which was adopted December 5, 2017, however the CAP does not itself establish a numeric threshold of significance for determining impacts with respect to GHG emissions. Notwithstanding, the City has utilized a screening threshold of 3,000 metric tons of carbon dioxide equivalent (MTCO2e) per year to determine if a potential GHG related impact would

[1] Section 38505(g), Health and Safety Code; and Section 21083.05, Public Resources Code
[2] 2019 California Energy Code, Title 24, Part 6, Section 110.10(b), https://codes.iccsafe.org/content/CAEC2019/subchapter-2-all-occupancies-mandatory-requirements-for-the-manufacture-construction-and-installation-of-systems-equipment-and-building-components

occur from a project. This approach is a widely accepted screening threshold used by the City of Redlands and numerous agencies in the SCAB.

In addition, SCAQMD methodology for Project's construction are to average them over 30-years and then add them to the Project's operational emissions to determine if the Project would exceed the screening values listed above.

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. GHG emissions associated with Project construction would occur over the short term and would consist primarily of emissions from equipment exhaust. Long-term regional emissions would also be associated with new vehicular trips and stationery-source emissions (i.e., natural gas used for heating and electricity usage for lighting). The calculations presented below include construction emissions in terms of annual CO_2e GHG emissions from increased energy consumption, water usage, and solid waste disposal, as well as estimated GHG emissions from vehicular traffic that would result from implementation of the proposed Project.

As discussed previously, during construction of the proposed Project, GHGs would be emitted through the operation of construction equipment, as well as emissions from worker and vendor vehicles, each of which typically uses fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O. Furthermore, CH_4 is emitted during the fueling of heavy equipment. Exhaust emissions from onsite construction activities would vary daily as construction activity levels change.

During operations, the Project would generate long-term GHG emissions from vehicular trips; water, natural gas, and electricity consumption; and solid waste generation. Mobile-source emissions of GHGs would include project generated vehicle trips associated with resident trips to and from the project site. Area-source emissions would be associated with activities such as landscaping and maintenance of proposed land uses, natural gas for cooking and heating, and other sources. Increases in stationary-source emissions would also occur at off-site utility providers as a result of demand for electricity, natural gas, and water by the proposed use.

The annual GHG emissions associated with the operation of the proposed Project are estimated to be approximately 2,761.15 MT CO2e/yr as summarized in Table GHG-1. This would be below the 3,000 MT CO2e/yr threshold used by the City of Redlands. As such, a less than significant impact related to greenhouse gas emissions would result from the Project.

Table GHG-1: Total Project GHG Emissions

Emission Source	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	R	Total CO_2e
Annual construction-related emissions amortized over 30 years	33.87	1.67E-03	1.67E-03	0.03	34.37
Mobile Source	2,297.00	0.13	0.12	4.16	2,339.00
Area Source	34.70	<0.005	<0.005	-	34.70
Energy Source	282.00	0.03	<0.005	-	283.00
Water Usage	12.00	0.28	0.01	-	20.90
Waste	13.20	1.32	0.00	-	46.30
Refrigerants	-	-	-	2.88	2.88
Total CO_2e (All Sources)	**2,761.15**				

Source: Urban Crossroads, 2022 (Appendix E)

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

Less than Significant Impact. The Project's consistency with SB 32 (2017 Scoping Plan) and the City's CAP are described below.

SB 32/2017 Scoping Plan Consistency. The 2017 Scoping Plan Update reflects the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. As summarized in Table GHG-2, the Project will not conflict with any of the provisions of the Scoping Plan and in fact supports seven of the action categories.

Table GHG-2: 2017 Scoping Plan Consistency Summary

Action	Responsible Parties	Consistency
Implement SB 350 by 2030		
Increase the Renewables Portfolio Standard to 50% of retail sales by 2030 and ensure grid reliability.	CPUC, CEC, CARB	**Consistent.** This measure is not directly applicable to development projects, but the proposed Project would use energy from Southern California Edison (SCE), which has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources.
Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.		**Consistent.** The Project would be constructed in compliance with current California Building Code requirements. Specifically, new buildings must achieve compliance with the current Building and Energy Efficiency Standards and the current California Green Building Standards requirements. The proposed Project includes energy efficient field lighting and fixtures that meet the current Title 24 Standards throughout the Project Site and would be a modern development with energy efficient boilers, heaters, and air conditioning systems.
Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in Integrated Resource Planning (IRP) to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly- owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.		
Implement Mobile Source Strategy (Cleaner Technology and Fuels)		
At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025.	CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of Transportation (Caltrans), CEC, OPR, Local Agencies	**Consistent.** These are CARB enforced standards; vehicles that access the Project that comply with the standards will comply with the strategy.
At least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030.		**Consistent.** These are CARB enforced standards; vehicles that access the Project that comply with the standards will comply with the strategy.
Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.		**Consistent.** These are CARB enforced standards; vehicles that access the Project that comply with the standards will comply with the strategy

Action	Responsible Parties	Consistency
Medium- and Heavy-Duty GHG Phase 2.		**Consistent.** These are CARB enforced standards; vehicles that access the Project that comply with the standards will comply with the strategy
Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20% of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100% of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NO_X standard.		**Not applicable.** This measure is not within the purview of this Project.
Last Mile Delivery: New regulation that would result in the use of low NO_X or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5% of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10% in 2025 and remaining flat through 2030.		**Not applicable.** This Project is not responsible for implementation of SB 375 and would therefore not conflict with this measure.
Further reduce vehicle miles traveled (VMT) through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."		**Not applicable.** This Project is not responsible for implementation of SB 375 and would therefore not conflict with this measure.
Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).	CARB	**Not applicable.** The Project is not within the purview of SB 375 and would therefore not conflict with this measure.
By 2019, adjust performance measures used to select and design transportation facilities		
Harmonize project performance with emissions reductions and increase competitiveness of transit and active transportation modes (e.g., via guideline documents, funding programs, project selection, etc.).	CalSTA, SGC, OPR, CARB, Governor's Office of Business and Economic Development (GO Biz), California Infrastructure and Economic Development Bank (IBank), Department of Finance (DOF), California Transportation Commission (CTC),	**Not applicable.** Although this is directed towards CARB and Caltrans, the proposed Project would be designed to promote and support pedestrian activity onsite and in the Project Site area by providing pedestrian access from the residential section to the restaurants and offsite retail uses.

Action	Responsible Parties	Consistency
	Caltrans	
By 2019, develop pricing policies to support low-GHG transportation (e.g., low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR, SGC, CARB	**Not applicable.** This Project is not responsible for developing pricing policies to support low-GHG transportation.
Implement California Sustainable Freight Action Plan		
Improve freight system efficiency.	CalSTA, CalEPA, CNRA, CARB, Caltrans, CEC, GO-Biz	When adopted, this measure would apply to all trucks accessing the Project site, this may include existing trucks or new trucks that are part of the statewide goods movement sector.
Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.		**Not applicable.** This measure is not within the purview of this Project.
Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.	CARB	LCFS, with an increased stringency (18% by 2030). When adopted, this measure would apply to all fuel purchased and used by the Project in the state.
Implement the Short-Lived Climate Pollutant Strategy by 2030		
40% reduction in methane and hydrofluorocarbon emissions below 2013 levels.	CARB, CalRecycle, CDFA, SWRCB, Local Air Districts	When adopted, the Project would be required to comply with this measure and reduce SLPS accordingly.
50% reduction in black carbon emissions below 2013 levels.		**Not applicable.** This measure is not within the purview of this Project.
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	CARB, CalRecycle, CDFA SWRCB, Local Air Districts	**Not applicable.** This measure is not within the purview of this Project.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	When adopted, the Project would be required to comply with the Cap-and-Trade Program if it generates emissions from sectors covered by Cap-and-Trade.
By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink		
Protect land from conversion through conservation easements and other incentives.	CNRA, Departments Within CDFA, CalEPA, CARB	**Not applicable.** This measure is not within the purview of this Project.
Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity		**Not applicable.** This measure is not within the purview of this Project.

Action	Responsible Parties	Consistency
Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments		**Not applicable.** This measure is not within the purview of this Project.
Establish scenario projections to serve as the foundation for the Implementation Plan		**Not applicable.** This measure is not within the purview of this Project.
Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018	CARB	**Not applicable.** This measure is not within the purview of this Project.
Implement Forest Carbon Plan	CNRA, California Department of Forestry and Fire Protection (CAL FIRE), CalEPA and Departments Within	**Not applicable.** This measure is not within the purview of this Project.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	**Not applicable.** This measure is not within the purview of this Project.

Consistency with the Redlands CAP. The City of Redlands adopted its CAP in December 2017. The CAP did not identify any required measure to achieve the 2030 emission targets. However, the CAP did recommend several measures that would achieve GHG reductions including providing solar photovoltaic systems, increasing energy efficiency 5% over 2016 standards, and using high efficiency lighting, and reducing GHG emissions associated with water delivery and treatment by 10%. In support of these measures the Project would increase energy efficiency approximately 30% over 2016 standards primarily through high efficiency of lighting. Additionally, the Project would comply with CALGreen indoor water requirements, which represent a 20% reduction in water use, and the Redlands MWELO, which would reduce outdoor water use. Thus, the Project would not obstruct the City of Redlands CAP GHG reduction and would therefore have a less than significant impact.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

None.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
9. HAZARDS AND HAZARDOUS MATERIALS. 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 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?	☐	☐	☐	☒

The discussion below is based on the Phase I Environmental Site Assessments, prepared by Force Environmental, Inc., included as Appendix F1 and F2 and the Phase II Environmental Site Assessment, prepared by Force Environmental, Inc., included as Appendix G.

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. A hazardous material is defined as any material that, due to its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the environment. Hazardous materials include, but

are not limited to, hazardous substances, hazardous wastes, and any material that regulatory agencies have a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the home, workplace, or environment. Hazardous wastes require special handling and disposal because of their potential to damage public health and the environment.

Construction

The proposed construction activities would involve the transport, use, and disposal of hazardous materials such as paints, solvents, oils, grease, and caulking. In addition, hazardous materials would be needed for fueling and servicing construction equipment on the site. These types of materials are not acutely hazardous, and all storage, handling, use, and disposal of these materials are regulated by federal and state requirements, which the project construction activities are required to strictly adhere to. These regulations include: the federal Occupational Safety and Health Act and Hazardous Materials Transportation Act; Title 8 of the California Code of Regulations (CalOSHA), and the state Unified Hazardous Waste and Hazardous Materials Management Regulatory Program. As a result, the routine transport, use or disposal of hazardous materials during construction activities of the project would be less than significant.

Operation

The Project involves construction of 131 multi-family residential uses and 10,550 SF of restaurant space. Residential and commercial uses typically do not present a hazard associated with the accidental release of hazardous substances into the environment because residents and retail/office employees are not anticipated to use, store, dispose, or transport large volumes of hazardous materials. Typically used hazardous materials include solvents, cleaning agents, paints, pesticides, batteries, fertilizers, and aerosol cans. These types of materials are not acutely hazardous and would only be used and stored in limited quantities within the residential and commercial buildings. The normal routine use of these hazardous materials products pursuant to existing regulations would not result in a significant hazard to people or the environment in the vicinity of the Project. Therefore, the Project would not result in a significant hazard to the public or to the environment through the routine transport, use, or disposal of hazardous waste, and impacts would be less than significant.

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?

Less Than Significant Impact.

Construction

Accidental Releases. While the routine use, storage, transport, and disposal of hazardous materials in accordance with applicable regulations during construction activities would not pose health risks or result in significant impacts; improper use, storage, transportation and disposal of hazardous materials and wastes could result in accidental spills or releases, posing health risks to workers, the public, and the environment. To avoid an impact related to an accidental release, the use of best management practices (BMPs) during construction are implemented as part of a Stormwater Pollution Prevention Plan (SWPPP) as required by the National Pollution Discharge Elimination System General Construction Permit (and included as PPP WQ-1). Implementation of an SWPPP would minimize potential adverse effects to workers, the public, and the environment. Construction contract specifications would include strict on-site handling rules and BMPs that include, but are not limited to:

- Establishing a dedicated area for fuel storage and refueling and construction dewatering activities that includes secondary containment protection measures and spill control supplies;
- Following manufacturers' recommendations on the use, storage, and disposal of chemical products used in construction;
- Avoiding overtopping construction equipment fuel tanks;
- Properly containing and removing grease and oils during routine maintenance of equipment; and
- Properly disposing of discarded containers of fuels and other chemicals.

Underground Storage Tanks & Shooting Range. As discussed in the Phase I Environmental Site Assessment conducted for 212 Brookeside Avenue, two recognized environmental conditions (RECs) were identified. Based on a review of records at the City of Redlands Department of Building and Safety, an underground diesel fuel storage tank (UST) was removed from the site in 1996. The UST was replaced with an aboveground diesel fuel storage tank. No soil sampling report was found for the removal of this UST. Additionally, during site reconnaissance, significant quantities of used bullet shells and bullet fragments were found inside the now-demolished shooting range room. The Phase I Environmental Site Assessment concluded that there is a potential for lead from bullets accumulating in soil within the shooting range. As such, a Phase II Environmental Site Assessment was conducted with soils testing. Soils testing results indicated low concentrations of petroleum hydrocarbons in soils in two samples and low concentrations of lead. However, these concentrations were below the Department of Toxic Substances (DTSC) residential and commercial limits. As such, the Phase II Environmental Site Assessment concluded that no additional testing was needed. Therefore, impacts related to the former UST and shooting range would be less than significant.

Operation

Operation of the proposed multi-family residences and restaurants involve use and storage of common hazardous materials such as paints, solvents, cleaning products, fuels, lubricants, adhesives, sealers, and pesticides/herbicides. Normal routine use of these typical commercially used products pursuant to existing regulations would not result in a significant hazard to the environment, residents, or workers in the vicinity of the Project.

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

Less Than Significant Impact. As described previously, the proposed mixed-use Project would not produce hazardous emissions or handle acutely hazardous materials, substances, or wastes. The nearest schools to the Project site are McKinley Elementary School located at 645 W. Olive Avenue, which is 0.35-mile from the Project site, and Redlands High School located at 840 E. Citrus Avenue, which is 0.69-mile from the Project site. As such, the Project site is not located within one-quarter mile of any existing or proposed schools. Therefore, the Project would not emit hazardous emissions or handle hazardous materials, substances, or waste within one-quarter mile of a school and impacts would be less than significant.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less Than Significant Impact. According to the California Department of Toxic Substances Control (DTSC) EnviroStor database, the Project site is not located on a federal Superfund site, State response site, voluntary cleanup site, school cleanup site, corrective action site, or tiered permit site (DTSC 2022). Additionally, according to the State Water Resource Control Board's Geotracker database, the Project site is not located on a Leaking UST Cleanup Site, Cleanup Program Site, Military Cleanup Site, Military Privitized Site, or Military UST site (SWRCB 2022). Therefore, the proposed Project would result in less than significant impacts related to a known hazardous materials site pursuant to Government Code Section 65965.5 and would not create a significant hazard to the public or the environment.

e) For a project 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?

No Impact. The proposed Project is not within an airport land use plan; however, the proposed Project is located approximately 2.6 miles southwest from the Redlands Municipal Airport. According to the Figure 7-7: Airport Hazards, within the City's General Plan, the Project site is not within a A: Runway Protection Zone, B1: Approach/Departure Zone, B2: Extended Approach/Departure Zone, C: Common Traffic Pattern, D:

Other Airport Environ, or within an Area of Special Compatibility Concern. Additionally, the proposed mixed-use development would be a maximum of four stories and approximately 55 ft in height at the parapet. Thus, the development would not be of a sufficient height to require modifications to the existing air traffic patterns at the airport and would not affect aviation traffic levels or otherwise result in substantial aviation-related safety risks. Therefore, the proposed Project would not result in an impact to an airport land use plan and would not result in a safety hazard or excessive noise for people residing or working in the Project area.

f) Impair implementation of an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The proposed Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan.

Construction

The proposed construction activities, including equipment and supply staging and storage, would occur within the Project site, and would not restrict access of emergency vehicles to the Project site or adjacent areas. The installation of new driveways and connections to existing infrastructure systems that would be implemented during construction of the proposed Project would not require closure of Eureka Street, W Citrus Avenue, or Brookside Avenue. Any temporary lane closures needed for utility connections or driveway construction would be required to implement appropriate measures to facilitate vehicle circulation, as included within construction permits. Thus, implementation of the project through the City's permitting process would ensure existing regulations are adhered to and would reduce potential construction related emergency access or evacuation impacts to a less than significant level.

Operation

Direct access to the Project site would be provided from driveways along W Citrus Avenue, Eureka Street, and Brookside Avenue. The Project driveways and internal access would be required through the City's permitting procedures to meet the City's design standards to ensure adequate emergency access and evacuation. Additionally, the drive aisles would be a minimum of 20-feet-wide, which would ensure adequate spacing for emergency access and evacuation. The Project is also required to provide fire suppression facilities (e.g., hydrants and sprinklers). The Fire Department and/or Public Works Department would review the development plans as part of the permitting procedures to ensure adequate emergency access pursuant to the requirements in Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9), included as Municipal Code Chapter 15.20. As such, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The Project site is within an urbanized area of the City of Redlands. The Project site is bounded by residences and commercial uses to the west, W Citrus Avenue and commercial uses to the north, Eureka Street to the east, and Brookside Avenue to the south. The Project site is not adjacent to any wildland areas. According to the CAL FIRE Fire Hazard Severity Zone map, the Project site is not within an area identified as a Fire Hazard Area that may contain substantial fire risk or a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2022). As a result, the proposed Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

Existing Plans, Programs, or Policies

PPP WQ-1: SWPPP. As listed below in Section 10, *Hydrology and Water Quality*.

Mitigation Measures

None.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
10. HYDROLOGY AND WATER QUALITY. 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 sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

The discussion below is based on the Preliminary Water Quality Management Plan, prepared by Hicks & Hartwick, Inc., included as Appendix H.

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. The proposed Project involves construction of a mixed-use development on the Project site.

Construction

Construction of the Project would require grading and excavation of soils, which would loosen sediment, and then have the potential to mix with surface water runoff and degrade water quality. Pollutants of concern during Project construction include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. During construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and transport of sediment downstream compared to existing conditions. During a storm event, soil erosion could occur at an accelerated rate. In addition, construction-related pollutants, such as chemicals, liquid and petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste, could be spilled, leaked, or transported via stormwater runoff into adjacent drainages and into downstream receiving waters.

Construction of the Project would disturb more than one acre of soil; therefore, the proposed Project would be required to obtain coverage under the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity. Construction of the Project would disturb more than one acre of soil; therefore, the proposed Project would be required to obtain coverage under the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity. Construction activity subject to this permit includes clearing, grading, and ground disturbances such as trenching, stockpiling, or excavation. The Construction General Permit requires implementation of a stormwater pollution prevention plan (SWPPP) that is required to identify all potential sources of pollution that are reasonably expected to affect the quality of storm water discharges from the construction site. The SWPPP would generally contain a site map showing the construction perimeter, proposed buildings, stormwater collection and discharge points, general pre- and post-construction topography, drainage patterns across the site, and adjacent roadways. The SWPPP would also include construction Best Management Practices (BMPs) such as:

- Maximize the permeable area,
- Incorporate landscaped buffer areas,
- Maximize canopy interception with drought tolerant landscaping
- Low flow infiltration within sand filter zones
- Site design with minimum design standards
- Landscape design with minimum to no impervious surfaces
- Isolated roof run-off into proposed Treatment Control Facility

Adherence to the Construction General Permit requirements and implementation of the appropriate BMPs as ensured through the City's construction permitting process are included as PPP WQ-1, which would ensure that the Project would not violate any water quality standards or waste discharge requirements. Potential water quality degradation associated with construction activities would be minimized, and impacts would be less than significant.

Operation

The proposed Project would include operation of multi-family residences and commercial restaurant uses, which would introduce the potential for pollutants such as, chemicals from cleaners, pesticides and sediment from landscaping, trash and debris, and oil and grease from vehicles. These pollutants could potentially discharge into surface waters and result in degradation of water quality. However, in accordance with the County of San Bernardino and the NPDES Areawide Stormwater Program, the proposed Project would be required to incorporate a WQMP with post-construction (or permanent) Low Impact Development (LID) site design, source control, and treatment control BMPs. The LID site design would minimize impervious surfaces and provide infiltration of runoff into landscaped areas.

The source control BMPs would minimize the introduction of pollutants that may result in water quality impacts; and treatment control BMPs that would treat stormwater runoff. The proposed Project would install an onsite storm drain system that would convey runoff to an underground infiltration system. This system would remove coarse sediment, trash, and pollutants (i.e., sediments, nutrients, heavy metals, oxygen demanding substances, oil and grease, bacteria, and pesticides). The additional types of BMPs that would be implemented as part of the proposed Project are listed in Table HYD-1.

Table HYD-1: Types of BMPs Incorporated into the Project Design

Type of BMP	Description of BMPs
LID Site Design	Optimize the site layout: The site has been designed so that runoff from impervious surfaces would flow to underground infiltration systems. Overflow would be directed to planter boxes.
	Use pervious surfaces: Landscaping is incorporated into the Project design to increase the amount of pervious area and onsite retention of stormflows. Additionally, the Project would include planter boxes throughout the site.
Source Control	Storm Drain Stenciling: All inlets/catch basins would be stenciled with the words "No Dumping—Drains to River," or equivalent message.
	Need for future indoor & structural pest control: The buildings would be designed to avoid openings that would encourage entry of pests to minimize the use of pesticides.
	Landscape/outdoor pesticide use: Final landscape plans would accomplish all of the following: • Design landscaping to minimize irrigation and runoff, to promote surface infiltration where appropriate, and to minimize the use of fertilizers and pesticides that can contribute to storm water pollution. • Consider using pest-resistant plants, especially adjacent to hardscape. • To ensure successful establishment, select plants appropriate to site soils, slopes, climate, sun, wind, rain, land use, air movement, ecological consistency, and plant interactions
	Roofing, gutters and trim: The architectural design would avoid roofing, gutters, and trim made of copper or other unprotected metals that may leach into runoff.
	Sidewalks and parking lots: Sidewalks and parking lots shall be swept regularly to prevent the accumulation of litter and debris. Debris from pressure washing would be collected to prevent entry into the storm drain system. Wash water containing any cleaning agent or degreaser would be collected and discharged to the sanitary sewer and not discharged to a storm drain.
Treatment Control	The infiltration systems proposed for the Project would detain runoff, filter it prior to discharge.

With implementation of the operational source and treatment control BMPs that are outlined in the Preliminary WQMP (Appendix H) that would be reviewed and approved by the City during the project permitting and approval process, potential pollutants would be reduced to the maximum extent feasible, and implementation of the proposed Project would not substantially degrade water quality. Therefore, impacts would be less than significant.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. The proposed Project would not deplete groundwater supplies. The Project site is underlain by the Bunker Hill Subbasin and Yucaipa Subbasin. The City extracts water from the Bunker Hill Subbasin and Yucaipa Subbasin (UWMP 2020). As of 2020, the groundwater from Bunker Hill totals 48.4% and the groundwater from Yucaipa Subbasin totals 1.1% of the City's annual water production.

Water pumping from the Bunker Hill Subbasin is adjudicated, which limits the allowable groundwater extraction to ensure a safe yield. Because the groundwater basin is managed through this plan, which limits the allowable withdrawal of water from the basin by water purveyors, and the Project would not pump water from the Project area (as water supplies would be provided by the City), the proposed Project would not result in a substantial depletion of groundwater supplies.

In addition, development of the proposed Project would result in large areas of impervious surfaces on the Project site. However, the Project would install an onsite storm drain system that would convey runoff to infiltration chambers within the parking areas. In addition, the Project includes areas of landscaping that would infiltrate stormwater onsite. Stormwater capture would be compliant with the Design Capture Volume (DCV) requirements of the San Bernardino County Stormwater Program through the implementation of infiltration, biotreatment, and Water Quality Credits. As a result, the proposed Project would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. The proposed Project would have a less than significant impact.

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;

Less Than Significant Impact. As described previously, existing regulations require the project to implement a project specific SWPPP during construction activities, that would implement erosion control BMPs, such as silt fencing, fiber rolls, or gravel bags, stabilized construction entrance/exit, hydroseeding, etc. to reduce the potential for siltation or erosion during Project construction. In addition, the Project is required to implement a WQMP, included as PPP WQ-2, that would provide operational BMPs to ensure that operation of the multi-family residences and restaurants would not result in erosion or siltation. With implementation of these regulations, impacts related to erosion or siltation onsite or off-site would be less than significant.

ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

Less Than Significant Impact. As discussed previously, the Project would install an onsite storm drain system that would convey runoff to underground infiltration systems that would capture and filter runoff. In addition, the Project includes 17,303 SF of landscaping that would capture stormwater onsite. These drainage facilities have been designed to accommodate the Project. The drainage facilities in drainage management area (DMA) 1 of the site have been designed to accommodate 8,631 cubic feet of stormwater and DMA 2 of the site has been designed to accommodate 2,330 cubic feet of stormwater. Additional stormwater capture and treatment methods such as biotreatment and Water Quality Credits would be applied to comply with San Bernardino County Stormwater Program requirements. As such, impacts related to flooding resulting from alteration of drainage patterns would be less than significant.

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

Less Than Significant Impact. As discussed previously in Response 6.3.10(a), construction of the proposed Project has the potential to introduce pollutants to the storm drainage system from erosion, siltation, and accidental spills. However, as required by PPP WQ-1, a SWPPP would be implemented to reduce potential impacts to water quality, including those impacts associated with soil erosion, siltation, and spills, so as not to provide additional sources of polluted runoff to the storm drain system. Therefore, construction impacts related to the provision of substantial additional sources of polluted runoff would be less than significant, and no mitigation is required.

The Project would realign existing storm drains lines within the site and install new storm drain lines throughout the site. Additionally, the Project would install multiple planter boxes for stormwater infiltration (17,303 SF of landscaping) and infiltration chambers under the proposed parking lot. These drainage facilities have been designed to accommodate the Project and would reduce potential additional sources of polluted runoff to a less than significant level.

iv. impede or redirect flood flows?

Less Than Significant Impact. According to FEMA's FIRM Flood Map, the northeastern tip of the Project site is located in Flood Zone AO, which means that portion of the Project site has the potential for shallow flooding during 100-year storm events. Since the proposed Project is partially within Zone AO, it must comply with City of Redlands Municipal Code Chapter 15.32, *Flood Damage Prevention*. Compliance measures include constructing occupiable building floors at least 2 feet above the estimated 100-year flood level to limit impacts from flooding. With compliance with Municipal Code Chapter 15.32, the proposed Project would not impede or redirect flood flows and impacts would be less than significant.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impact. According to FEMA's FIRM Flood Map, the northeastern tip of the Project site is located in Flood Zone AO, which means that portion of the Project site has the potential for shallow flooding during 100-year storm events. Since the proposed Project is partially within Zone AO, it must comply with City of Redlands Municipal Code Chapter 15.32, *Flood Damage Prevention*. With compliance with Municipal Code Chapter 15.32, the proposed Project would not risk release of pollutants due to Project inundation and impacts would be less than significant.

Tsunamis are generated ocean wave trains generally caused by tectonic displacement of the sea floor associated with shallow earthquakes, sea floor landslides, rock falls, and exploding volcanic islands. The proposed Project is approximately 50 miles from the ocean shoreline. Based on the inland location of the Project site, the Project site is not at risk of inundation from tsunami. Therefore, the proposed Project would not risk release of pollutants from inundation from a tsunami and no impacts would occur.

A seiche is a phenomenon that occurs when seismic ground shaking induces standing waves inside water retention facilities (e.g., reservoirs and lakes). Such waves can cause retention structures to fail and flood downstream properties. The Project site is not located adjacent to any water retention facilities. For this reason, the Project site is not at risk of inundation from seiche waves. Therefore, the proposed Project would not risk release of pollutants from inundation from seiche and no impacts would occur.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. The Project site is fully vacant and was previously developed, and the proposed Project would result in a substantial increase of imperviousness. As described above, the proposed storm drain system is sized to adequately accommodate increased stormwater flows from the Project area and would maintain the existing drainage pattern of the site. Runoff would discharge into one of onsite infiltration chambers or planter boxes, which would retain, slow, and/or filter the runoff before its discharge through new storm drain connections to the existing storm drain infrastructure.

As described previously, the Project would be required to have an approved SWPPP, which would include construction BMPs to minimize the potential for construction related sources of pollution. For operations, the proposed Project would be required to implement source control BMPs to minimize the introduction of pollutants; and treatment control BMPs to treat runoff. With implementation of the operational source and treatment control BMPs that would be required by the City during the project permitting and approval

process, potential pollutants would be reduced to the maximum extent feasible, and implementation of the proposed Project would not obstruct implementation of a water quality control plan.

Also as described previously, groundwater is adjudicated, which limits the allowable groundwater extraction to ensure a safe yield. Because the groundwater basin is managed through this plan, which limits the allowable withdrawal of water from the basin by water purveyors, and the Project would not pump water from the project area (as water supplies would be provided by the City), the proposed Project would not conflict with or obstruct a groundwater management plan, and no impacts would occur.

Existing Plans, Programs, or Policies

PPP WQ-1: Prior to grading permit issuance, the project developer shall have a Stormwater Pollution Prevention Plan (SWPPP) prepared by a QSD (Qualified SWPPP Developer) pursuant to the Municipal Code Chapter 13.54. The SWPPP shall incorporate all necessary Best Management Practices (BMPs) and other City requirements to comply with the National Pollutant Discharge Elimination System (NPDES) requirements to limit the potential of polluted runoff during construction activities. Project contractors shall be required to ensure compliance with the SWPPP and permit periodic inspection of the construction site by City of Redlands staff or its designee to confirm compliance.

PPP WQ-2: Prior to grading permit issuance, the project developer shall have a Water Quality Management Plan (WQMP) approved by the City for implementation. The project shall comply with the City's Municipal Code Section 13.54 and the Municipal Separate Storm Sewer System (MS4) permit requirements in effect for the Regional Water Quality Control Board (RWQCB) at the time of grading permit to control discharges of sediments and other pollutants during operations of the Project.

Mitigation Measures

None.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
11. LAND USE AND PLANNING. 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) Physically divide an established community?

No Impact. The Project site is currently vacant and disturbed within an urbanized portion of the city surrounded by commercial, public institution, and residential uses. The proposed Project would develop the site to provide a mixed-use development with 131 multi-family residential units, 10,550 SF of restaurant space, recreational areas, and associated parking. The Project would not physically divide an established community and will be consistent with the mixed-use character of the surrounding Downtown Redlands area. In addition, the Project would not change roadways, pedestrian bridges, or install any infrastructure that would result in a physical division. Thus, the proposed Project would not result in impacts related to physical division of 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?

Less Than Significant Impact. The documents regulating land use for the Project site and immediate vicinity are the City's General Plan and the City's Municipal Code. The proposed Project's relationship to these planning documents is described below.

General Plan. The Project site has a General Plan designation on Commercial. Additionally, the entire Project site is within the Transit Villages overlay. These General Plan designations do not have the purpose of avoiding or mitigating an environmental effect.

The proposed Project is a mixed-use development with a residential density of approximately 45.6 du/ac. The Commercial designation allows for residential and mixed-use development, which the Project would be consistent with.

Table LU-1: General Plan Consistency

General Plan Policies	Project Consistency
Distinctive City	
2-A.1 Provide for the equitable distribution of public facilities and amenities, such as parks and public facilities, throughout Redlands.	**Consistent.** The Project would provide enhanced public sidewalks along Brookside Avenue and Eureka Street, which would enhance pedestrian connectivity in Downtown Redlands.
2-A.4 Maintain continuity in streetscape design along major streets and avenues that traverse north and south – California, Nevada, Alabama, Tennessee, Orange, Church, University, Judson, and Wabash; and those that traverse east and west –	**Consistent.** The Project would enhance the streetscape designs, consistent with the City of Redlands's General Plan, along W Citrus Avenue, Eureka Street, and Brookside Avenue. The Project would provide ground floor restaurant uses on the corner of Brookside

Pioneer, San Bernardino, Lugonia, Redlands Boulevard, and Citrus.	Avenue and Eureka Street, which is consistent with surrounding commercial uses along these streets.
2-A.8 Insist on high-quality development and revitalization in older neighborhoods, such as the Orange Street and Colton Avenue commercial corridors, that is sensitive to historic architecture, and provides a broad range of retail, restaurants, professional services, and offices that meet the community's needs. Build a sense of community in these commercial areas.	**Consistent.** The Project would develop the underutilized, infill site with a mixed-use development. Project development includes design features to ensure sensitivity to surrounding historical architecture.
2-A.16 Use transit stations as focal points for interconnectivity; plan to equally serve travelers from north and south. Plan for each village around the transit stations to have a unique character that complements the adjacent neighborhoods.	**Consistent.** The proposed Project would be within the Transit Villages Overlay. The Project would complement surrounding commercial uses by providing a mixed-use development with restaurants, residential units, and public/private open space in the Downtown Redlands area.
2-A.18 Promote a safe and secure environment near transit stations through design, adjacent land use considerations, public space programming, and coordination with public safety providers.	**Consistent.** The Project would be reviewed by the City of Redlands Police Department and City of Redlands Fire Department to ensure that accurate safety measures are provided, including security lighting and parking lot lighting.
2-A.25 Require any application that would alter or demolish an undesignated and unsurveyed resource over 50-years-old to be assessed on the merits of the structure, and to be approved by the Historic and Scenic Preservation Commission.	**Consistent.** The Project site is currently vacant and does not contain any buildings. As such, no buildings over 50-years-old would be demolished.
2-A.34 Uphold the designation of the following streets within the city as scenic highways, drives, and historic streets. Special development standards have been adopted by Resolution for these streets. The streets are: • Brookside Avenue, from Lakeside Avenue to Eureka Street; • Olive Avenue, from Lakeside Avenue to Cajon Street; • Center Street, from Brookside Avenue to Crescent Avenue; • Highland Avenue, from Serpentine Drive to Cajon Street; • Sunset Drive, from Serpentine Drive to Edgemont Drive; • Cajon Street; • Mariposa Drive, between Halsey and Sunset Drive; and • Dwight Street, between Pepper Street and Mariposa Drive. In addition, consider designating the following roads as scenic drives within the community as neighborhood connectors and recreational routes for drivers and bike riders.	**Consistent.** The Project is bounded by Brookside Avenue, W Citrus Avenue, and Eureka Street. Brookside Avenue is considered a historic street. The proposed Project would be consistent with the development standards set forth by the City and would compliment the architecture of the historic U.S. Post Office building across Brookside Avenue.

• Riverview Drive along the Santa Ana River Wash; • Live Oak Canyon Road; • San Timoteo Canyon Road; • Sylvan Boulevard; • Nevada Street, from the Orange Blossom Trail to Barton Road; • Pioneer Avenue, from River Bend Drive to Judson Street; and • Rural roads in Crafton.	
2-A.35 Establish standards for the evaluation of exterior lighting for new development and redevelopment to ensure that exterior lighting (except traffic lights, navigational lights, and other similar safety lighting) is minimized, restricted to low-intensity fixtures, shielded, and concealed to the maximum feasible extent, and that high-intensity perimeter lighting and lighting for sports and other private recreational facilities is limited to reduce light pollution visible from public viewing areas.	**Consistent.** The proposed Project would include exterior lighting in the public open space and surrounding Project buildings. The Project would be conditioned to provide a photometric study. All exterior lighting will be required to be properly shielded and concealed to reduce light pollution.
2-A.71 Using an annually updated Archaeological Resource Sensitivity Map, review proposed development projects to determine whether a site contains known prehistoric or historic cultural resources and/or to determine the potential for discovery of additional cultural resources.	**Consistent.** As discussed in Section 6.5, *Cultural Resources,* a review of the SCCIC was conducted. The Project site does not contain any known archaeological or historical resources. However, there is a potential that during ground disturbing activities, archaeological resources are uncovered. As such, the Project would incorporate MM CUL-1 requiring archaeological monitoring. With implementation of MM CUL-1, impacts would be less than significant.
2-A.72 Require that applicants for projects identified by the South Coastal Information Center as potentially affecting sensitive resource sites hire a consulting archaeologist to develop an archaeological resource mitigation plan and to monitor the project to ensure that mitigation measures are implemented.	
2-A.73 Require that areas found during construction to contain significant historic or prehistoric archaeological artifacts be examined by a qualified consulting archaeologist (RPA certified) or historian for appropriate protection and preservation.	
2-A.74 Proactively coordinate with the area's native tribes in the review and protection of any tribal cultural resources discovered at development sites.	**Consistent.** As discussed in Section 6.18, *Tribal Cultural Resources,* in compliance with AB 52 requirements, the City sent letters to multiple Native American tribes. The San Manuel Band of Mission Indians requested consultation regarding the proposed Project. The San Manuel Band of Mission Indians consulted with City on May 3, 2022 and stated that the Project site is within Serrano ancestral territory. However, the Tribe stated that due to the nature and location of the Project site, the Tribe does not have any concerns with the Project's implementation. However, the San Manuel Band of Mission Indians requests that in addition to MM CUL-1,

	the Tribe be notified of any incidental discoveries of cultural resources and requests that a tribal monitor be retained if any incidental discoveries occur. Mitigation Measures TCR-1 has been included to require a Monitoring and Treatment Plan and Native American monitoring of excavation and grading activities if cultural resources are unearthed by Project construction activities. Therefore, the proposed Project would result in significant impacts to tribal cultural resources.
2-A.75 Require, as a standard condition of approval, that project applicants provide an assessment as to whether grading for the proposed project would impact underlying soil units or geologic formations that have a moderate to high potential to yield fossiliferous materials, prior to issuance of a grading permit. If the potential for fossil discovery is moderate to high, require applicants to provide a paleontological monitor during rough grading of the project.	**Consistent.** As discussed in Section 6.3.7, *Geology and Soils,* soils underlying the Project site are mapped as younger and older surficial deposits, more specifically very young wash deposits, active (Qvyw) and very old axial-valley deposits, Unit 3 (Qvoa3). While the younger deposits typically do not contain significant vertebrate fossils within the uppermost layers, it is likely there are underlaying sediments of older Quaternary deposits. As such, MM PAL-1 is included to require paleontological monitoring and preparation of a PRMP. With implementation of MM PAL-1, impacts would be less than significant.
2-A.76 Establish a procedure for the management of paleontological materials found on-site during a development, including the following provisions: • If materials are found on-site during grading, require that work be halted until a qualified professional evaluates the find to determine if it represents a significant paleontological resource. • If the resource is determined to be significant, the paleontologist shall supervise removal of the material and determine the most appropriate archival storage of the material. • Appropriate materials shall be prepared, catalogued, and archived at the applicant's expense and shall be retained within San Bernardino County if feasible.	
2-A.94 Encourage mixed-use projects Downtown that integrate retail, restaurant, office, and residential uses. Permit urban housing at a density up to the High-Density Residential standard.	**Consistent.** The proposed Project would include the development of a mixed-use development within the Downtown Redlands area. The proposed buildings would include 131 multi-family dwelling units and 10,550 SF of restaurant space. The Project would result in a residential density of 45.6 dwelling units per acre, which would be above High-Density Residential standard, but within the allowed density set forth by the proposed Transit Villages Specific Plan.
2-A.97 Seek an increased presence of both residents and activity in Downtown with new development—particularly residential as part of mixed-use development—as well as commercial, entertainment, and cultural uses that serve both residents and visitors.	**Consistent.** The proposed Project would develop the site with 131 multi-family dwelling units and 10,550 SF of restaurant space. Additionally, the Project would include a 9,770 SF roof deck, a 7,380 SF pool plaza, a 5,356 SF spa plaza, and a 527 SF upper lounge,

	which would provide for increased residences and activity in Downtown Redlands.
2-A.98 Promote a variety of housing types to attract a spectrum of households to live Downtown.	**Consistent.** The proposed Project include 131 multi-family dwelling units including studios, 1-bedroom units, and 2-bedroom units to provide a variety of housing within the Downtown Redlands area.
Prosperous Economy	
3-A.10 Encourage mixed-use projects within the Transit Villages that will attract a wide array of uses including retail, restaurant, entertainment, office, residential, and cultural offerings	**Consistent.** As discussed above, the proposed Project would develop the site with 131 multi-family dwelling units and 10,550 SF of restaurant space. Additionally, the Project would include a 9,770 SF roof deck, a 7,380 SF pool plaza, a 5,356 SF spa plaza, and a 527 SF upper lounge.
3-A.12 Encourage the location of commercial centers according to function and scale – regional, general, and neighborhood –so that centers of different scales complement one another and each is accessible to the primary market it is designed to serve.	**Consistent.** The proposed Project would be scaled, buffered, and designed to be compatible with the surrounding commercial uses and historic architecture throughout Redlands.
3-A.19 Support opportunities to enhance innovation through business incubators, expanded broadband and digital infrastructure, live-work spaces, mixed-use development, and policies that accommodate other industry innovations at the Redlands Municipal Airport, along Colton Avenue and Orange Street, Downtown, and in the Transit Villages.	**Consistent.** As discussed above, the proposed Project would develop the site with 131 multi-family dwelling units and 10,550 SF of restaurant space. Additionally, the Project would include a 9,770 SF roof deck, a 7,380 SF pool plaza, a 5,356 SF spa plaza, and a 527 SF upper lounge.
3-A.34 Encourage and support unique specialty retail and restaurant uses in the Downtown core.	**Consistent.** As discussed previously, the proposed Project would develop the site with 131 multi-family dwelling units and 10,550 SF of restaurant space. Additionally, the Project would include a 9,770 SF roof deck, a 7,380 SF pool plaza, a 5,356 SF spa plaza, and a 527 SF upper lounge.
3-A.37 Ensure adequate parking Downtown and efficiency in traffic flow to enable the continued revitalization of the commercial core	**Consistent.** Street parking along the boundaries of the Project. In addition, a parking garage would be provided for residents and a surface parking lot would be provided for restaurant guests.
3-A.39 Encourage and support the development of additional housing Downtown to increase the vitality and diversity of Downtown retail and services.	**Consistent.** The proposed Project would include 131 multi-family dwelling units which would provide additional housing Downtown. As the Project proposes a mixed-use development, it would provide diverse uses to the Downtown area.
3-A.40 Enhance and expand the public spaces Downtown (streetscapes, plazas, parks) to improve the pedestrian experience.	**Consistent.** Sidewalks would be provided throughout the Project and new sidewalks would be constructed along Eureka Street and Brookside Avenue to improve the pedestrian experience.
Livable Community	
4-A.1 Promote the orderly development and growth of urban areas in infill areas and the city center while encouraging the ongoing cultivation of agricultural land and the preservation of rural living areas in the canyons, Crafton, and Mentone.	**Consistent**. The proposed Project would develop an underutilized site within Downtown and would not affect any agricultural land within the City as the existing Project site is vacant and was previously developed with public/institutional uses.
4-A.3 Ensure that infill development complements existing development in use, design, and scale, and	**Consistent.** The proposed Project would be scaled and designed to be compatible with the Downtown

that it supports the cohesion and integration of the city's development pattern.	architectural styles within the City including Spanish Mission and 19th Century, and Mediterranean Style Contemporary.
4-A.7 Promote a range of residential densities to encourage a mix of housing types in varying price ranges and rental rates.	**Consistent.** The proposed Project would include 131 multi-family dwelling units which would include studios, one-bedroom, and two-bedroom units. The proposed dwelling units would vary in price range and provide a mix of housing types.
4-A.8 Promote the development of a greater variety of housing types, including single-family homes on small lots, accessory dwelling units, townhomes, lofts, live-work spaces, and senior and student housing to meet the needs of future demographics and changing family sizes.	**Consistent.** As mentioned above, the proposed Project would include 131 multi-family dwelling units which would include studios, one-bedroom, and two-bedroom units. The proposed dwelling units would vary in price range and provide a mix of housing types.
4-A.11 Ensure that opportunities exist for the development of housing types that are affordable to all segments of the Redlands community and are distributed equitably throughout the community.	**Consistent.** As mentioned above, the proposed Project would include 131 multi-family dwelling units which would include studios, one-bedroom, and two-bedroom units. The units would vary in price based on size and location.
4-A.12 Support new residential development in Downtown, the Transit Villages, and other focused infill sites accessible to transit and in central parts of the community.	**Consistent.** The proposed Project would include 131 multi-family dwelling units located Downtown which would be accessible to transit.
4-A.20 Establish new neighborhood commercial centers to serve the needs of community members in areas planned to accommodate new growth, such as Downtown and the Transit Village areas.	**Consistent. T**he proposed Project would develop the site with 131 multi-family dwelling units and 10,550 SF of restaurant space. Additionally, the Project would include a 9,770 SF roof deck, a 7,380 SF pool plaza, a 5,356 SF spa plaza, and a 527 SF upper lounge.
4-A.87 Promote clusters of mixed-use development along Redlands Boulevard near the Mixed-Use Cores of the proposed Transit Villages, providing opportunities for commercial, office, and residential development consistent with the needs and characteristics specific to each Transit Village.	**Consistent.** As mentioned previously, the proposed Project would develop the site with 131 multi-family dwelling units and 10,550 SF of restaurant space. Additionally, the Project would include a 9,770 SF roof deck, a 7,380 SF pool plaza, a 5,356 SF spa plaza, and a 527 SF upper lounge.
4-A.95 Promote infill development to create a continuous corridor of mixed-use and commercial activity.	**Consistent.** The proposed Project would be an infill development that would develop an underutilized site with multi-family dwelling units, amenity areas, and restaurant space.
4-A.97 Encourage the development of bicycle, pedestrian, and transit access that reduces the need for on-site parking. Improve the pedestrian experience within these corridors through street trees and landscaping.	**Consistent.** The proposed Project would include sidewalks and transit access that would increase walkability and improve the pedestrian experience.
4-A.98 Create greater opportunity to intensify and consolidate land uses on adjacent parcels and connect existing assets through infill development.	**Consistent.** The proposed Project would consist of an infill development that would develop an underutilized site with a mixed-use development that would be similar to the surrounding uses.
4-A.121 Encourage a centrally-located mix of uses to promote activity and economic vitality.	**Consistent.** The proposed Project would develop the site with 131 multi-family dwelling units and 10,550 SF of restaurant space. Additionally, the Project would include a 9,770 SF roof deck, a 7,380 SF pool plaza, a 5,356 SF spa plaza, and a 527 SF upper lounge.

4-A.150 Encourage the undergrounding of utilities for all new development.	**Consistent.** The proposed Project would install new onsite utilities that would be underground and connect to existing lines.
4-A.157 Include the Police and Fire departments in the review of new developments to provide feedback on building and site design safety.	**Consistent.** The proposed Project would undergo plan checks that would allow for Police and Fire review to ensure building and site design safety requirements are met.
Connected City	
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. This could be accomplished through: • Management and implementation of complete street strategies, including retrofitting existing streets to foster biking and walking as appropriate; • Short block lengths, reduced street widths, and/or traffic calming measures; and • Providing pedestrians and bicyclists with options where motorized transportation is prohibited.	**Consistent.** The proposed Project would be designed to include sidewalks and bike lanes to facilitate pedestrian and bicyclists with accessibility to and from the Project site. The Project would undergo City review which would ensure appropriate emergency vehicle access and circulation is provided.
5-A.15 Maintain access for emergency vehicles and services by providing two means of ingress/egress into new communities, limitations on the length of cul-de-sacs, proper roadway widths and road grades, adequate turning radius, and other requirements per the California Fire Code.	**Consistent.** The proposed Project would undergo City review to ensure adequate emergency access is provided throughout the Project site.
5-A.68 Provide for direct pedestrian paths and access from new developments to the nearest public transportation stop.	**Consistent.** The nearest Omnitrans bus stop is located directly adjacent to the Project site on Brookside Avenue. Sidewalks would be provided throughout the site and along Eureka Street and Brookside Avenue which would provide access to the bus stop and connect to existing sidewalks.
5-A.73 Provide adequate parking availability Downtown for residents, commuters, visitors, and shoppers throughout the day.	**Consistent.** As mentioned previously, a parking garage would be provided for residents and a surface parking lot would be provided for restaurant patrons and would be adequate for residents, commuters, visitors, and shoppers.
5-A.75 Consider techniques to reduce the amount of area in the Transit Villages occupied by parking, especially for developments located within easy walking distance of the Passenger Rail stations.	**Consistent.** As mentioned previously, a parking garage would be provided for residents and a surface parking lot would be provided for restaurant patrons.
5-A.77 Encourage developers to meet their minimum parking requirements via shared parking between uses, payment of in-lieu fees, joint parking districts, or off-site parking within a reasonable walking time of 10 minutes or less.	**Consistent.** The proposed Project would undergo City review to ensure that the Project meets the minimum parking requirements. Parking would be included onsite which would not result in off-site parking.
Vital Environment	
6-A.35 Promote the use of Low Impact Development strategies, BMPs, pervious paving	**Consistent.** The proposed Project would include low impact development strategies, BMPs, pervious paving

materials, and on-site infiltration for treating and reducing stormwater runoff before it reaches the municipal stormwater system.	materials, and on-site infiltration for treating and reducing stormwater runoff as discussed in the WQMP included as Appendix H.
6-A.43 Ensure that post-development peak stormwater runoff discharge rates do not exceed the estimated pre-development rate. Dry weather runoff from new development must not exceed the pre-development baseline flow rate to receiving waterbodies.	**Consistent.** A preliminary WQMP was prepared for the Project and is included as Appendix H. The hydrology report ensures that post-development peak stormwater runoff discharge rates would not exceed the estimated pre-development rates.
Healthy Community	
7-A.35 Implement street design features that facilitate walking and biking in both new and established areas. Require a minimum standard of these features for all new developments.	**Consistent.** Sidewalks would be provided throughout the Project and new sidewalks would be constructed along Eureka Street and Brookside Avenue to improve the pedestrian experience.
7-A.46 Encourage the provision of bike lockers, bike-sharing, and other methods of supporting active transportation that can contribute to healthy lifestyles.	**Consistent.** The proposed Project would include bike racks and bike locker rooms throughout the Project site to support active transportation in the City.
7-A.75 Consider the impacts to health and safety from potential flooding on future development in flood-prone areas, including Downtown Redlands. Ensure that new development follows appropriate design standards.	**Consistent.** The Project has been designed to reduce flooding impacts by including landscaping throughout the site. Additionally, buildings would be designed to be above the flood line in order to minimize impacts related to flooding.
7-A.95 Coordinate with the Redlands Fire Department and other fire prevention agencies to review all applications for new development. The Fire Department's review should ensure compliance with fire safety regulations and assess potential impacts to existing fire protection services and the need for additional and expanded services	**Consistent.** The proposed Project would undergo City review which includes Redlands Fire Department review. The Fire Department would ensure the Project complies with all fire safety regulations.
7-A.107 Continue to restrict development within Alquist-Priolo Earthquake Fault Zones and along other active and potentially active faults that have not yet received Alquist-Priolo classification	**Consistent.** The proposed Project is not within an Alquist-Priolo Earthquake Fault Zone. The nearest Alquist-Priolo Earthquake Fault Zone is approximately 2.7 miles to the northeast. In addition, the Project would comply with Title 24 of the California Building Code as included in Chapter 15.04 of the City's Municipal Code.
7-A.109 Require areas identified as having significant liquefaction potential (including secondary seismic hazards such as differential compaction, lateral spreading, settlement, rock fall, and landslide) to undergo geotechnical study prior to development and to mitigate the potential hazard to a level of insignificance or, if mitigation is not possible, to preserve these areas as open space or agriculture.	**Consistent.** A geotechnical report was prepared for the proposed Project included as Appendix D. Based on the geotechnical report, the proposed Project site is not located within an area identified as having liquefaction potential.
7-A.114 For new construction and exterior building expansions including multistory additions or lateral expansions as deemed appropriate by the City Building Department, require the preparation of a geotechnical/soils/geologic report by a registered civil geotechnical/soils engineer and a certified engineering geologist. This report shall address erodible or expansive and collapsible soils, existing	**Consistent.** As mentioned above, a geotechnical report was prepared for the proposed Project included as Appendix D. The geotechnical report addresses geologic concerns on the site and provides recommendations for Project grading and construction.

or potential landslides, areas with unsuitable percolation characteristics, large-scale subsidence, non-rippable bedrock areas, ground motion parameters, active/potentially active faulting, liquefaction, and any other geotechnical concepts as appropriate, and make recommendations for mitigating any potential adverse impacts.	
7-A.115 Require soil erosion mitigation during construction.	**Consistent.** The proposed Project would include preparation of a SWPPP to mitigate any potential soil erosion during construction.
7-A.123 Regulate development on sites with known contamination of soil and groundwater to ensure that construction workers, future occupants, the public, and the environment are adequately protected from hazards associated with contamination. Work with State and local agencies to encourage cleanup of such sites.	**Consistent**. The proposed Project would redevelop the vacant site with a mixed-use development. As discussed in Section 6.3.9, *Hazards*, the Project site does not contain any contaminated soils.
7-A.124 Prohibit the development of projects that would reasonably be anticipated to emit hazardous air emissions or handle extremely hazardous substances within a quarter mile of a school.	**Consistent.** The proposed Project would develop 131 multi-family residential units and 10,550 SF of restaurant space. The proposed Project would not emit hazardous air emissions or handle extremely hazardous substances. In addition, the closest schools are McKinley Elementary School, located approximately 0.33 miles south of the Project site, and Redlands High School, located approximately 0.69 miles east of the Project site.
7-A.135 Use the noise and land use compatibility matrix (Table 7-10) and Future Noise Contours map (Figure 7-9) as criteria to determine the acceptability of a given land use, including the improvement/construction of streets, railroads, freeways, and highways. Do not permit new noise-sensitive uses—including schools, hospitals, places of worship, and homes—where noise levels are "normally unacceptable" or higher, if alternative locations are available for the uses in the city.	**Consistent.** A noise study was prepared for the proposed Project included as Appendix I. As demonstrated by the Noise Impact Analysis, the Project would satisfy the City of Redlands 45 dBA CNEL residential interior noise level standards, which would be verified as a part of the permit issuance and building plan check process.
7-A.136 Require a noise analysis be conducted for all development proposals located where projected noise exposure would be other than "clearly" or "normally compatible" as specified in Table 7-10	**Consistent**. As mentioned above, a noise study was prepared for the proposed Project included as Appendix I. As demonstrated by the Noise Impact Analysis, the Project would satisfy the City of Redlands 45 dBA CNEL residential interior noise level standards, which would be verified as a part of the permit issuance and building plan check process.
7-A.137 For all projects that have noise exposure levels that exceed the standards in Table 7-10, require site planning and architecture to incorporate noise-attenuating features. With mitigation, development should meet the allowable outdoor and indoor noise exposure standards in Table 7-11. When a building's openings to the exterior are required to be closed to meet the interior noise standard, mechanical ventilation shall be provided.	**Consistent.** The proposed Project would not exceed noise levels that exceed the standards set forth in Table 7-10. As demonstrated by the Noise Impact Analysis, the Project would satisfy the City of Redlands 45 dBA CNEL residential interior noise level standards, which would be verified as a part of the permit issuance and building plan check process.

7-A.138 Continue to maintain performance standards in the Municipal code to ensure that noise generated by proposed projects is compatible with surrounding land uses.	**Consistent.** The proposed Project would be consistent with the noise standards set by the City's Municipal code. As discussed in Section 6.3.13, *Noise*, projected construction and operational noise levels at surrounding sensitive receptors, including nearby residences, would be within allowable limits.
7-A.149 Ensure that construction and grading projects minimize short-term impacts to air quality. a. Require grading projects to provide a stormwater pollution prevention plan (SWPPP) in compliance with City requirements, which include standards for best management practices (BMPs) that control pollutants from dust generated by construction activities and those related to vehicle and equipment cleaning, fueling, and maintenance; b. Require grading projects to undertake measures to minimize mono-nitrogen oxides (NOx) emissions from vehicle and equipment operations; and c. Monitor all construction to ensure that proper steps are implemented.	**Consistent.** As discussed in Section 6.3.3, *Air Quality,* the proposed Project would minimize short-term impacts to air quality and impacts related to air quality during construction would be less than significant. In addition, a SWPPP would be prepared for the proposed Project in compliance with City requirements.
7-A.153 Require applicants for sensitive land uses (e.g. residences, schools, daycare centers, playgrounds, and medical facilities) to site development and/or incorporate design features (e.g. pollution prevention, pollution reduction, barriers, landscaping, ventilation systems, or other measures) to minimize the potential impacts of air pollution on sensitive receptors.	**Consistent.** The proposed Project would include landscaping along the boundaries of the site and throughout the Project. In addition, the proposed mixed-use development would not exceed operational Air Quality or GHG thresholds and would not significantly impact air pollution on sensitive receptors.
Sustainable Community	
8-A.8 Implement and enforce California Code of Regulations Title 24 building standards (parts 6 and 11) to improve energy efficiency in new or substantially remodeled construction. Consider implementing incentives for builders that exceed the standards included in Title 24 and recognize their achievements over the minimum standards	**Consistent.** The proposed Project would implement Title 24 building standards and California Green Building Standards as included in Chapter 15.16 of the City's Municipal Code.
8-A.9 Encourage the use of construction, roofing materials, and paving surfaces with solar reflectance and thermal emittance values per the California Green Building Code (Title 24, Part 11 of the California Code of Regulations) to minimize heat island effects.	**Consistent.** As discussed above, the Project would comply with the California Green Building Standards as included in Chapter 15.16 of the City's Municipal Code.
8-A.10 Integrate trees and shade into the built environment to mitigate issues such as stormwater runoff and the urban heat island effect.	**Consistent.** The proposed Project would include street trees along the Project boundaries and throughout the site.
8-A.25 Encourage water conservation through the following strategies: • Establish water and wastewater rates that encourage conservation and provide for system maintenance.	**Consistent.** The proposed Project would include landscaping and irrigation consistent with CalGreen requirements which would be designed to reduce water demand, retain runoff, decrease flooding, and recharge groundwater.

• Update the landscape irrigation ordinance to continue reducing the use of potable water for landscape irrigation to CALGreen requirements. All aspects of landscaping from the selection of plants to soil preparation and the installation of irrigation systems should be designed to reduce water demand, retain runoff, decrease flooding, and recharge groundwater. • Establish incentives for use of water efficient fixtures and fittings. • Expand the current landscaping ordinance for parking lots (Section 18.168.210 of the Municipal Code) to encourage the use of drought tolerant species. • Promote the use of permeable surfaces for hardscape. Impervious surfaces such as driveways, streets, and parking lots should be minimized so that land is available to absorb stormwater, reduce polluted urban runoff, recharge groundwater, and reduce flooding. • Incorporate water holding areas such as creek beds, recessed athletic fields, ponds, cisterns, and other features that serve to recharge groundwater, reduce runoff, improve water quality, and decrease flooding into the urban landscape.	
8-A.37 Promote design in new development that incorporates space for recycling containers and other waste diversion facilities.	**Consistent.** The proposed Project would include recycling containers for onsite waste. Additionally, the Project would comply with AB 341 that requires diversion of a minimum of 75 percent of operational solid waste
8-A.39 Continue implementation and enforcement of the California Building and Energy codes to promote energy efficient building design and construction.	**Consistent.** As mentioned previously, the proposed Project would comply with the CBC and California Green Building Standards Code as included in Chapter 15.16 and 15.04.

Existing Plans, Programs, and Policies

None.

Mitigation Measures

None.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
12. MINERAL RESOURCES. 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) 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?

No Impact. In 1975, the California Legislature enacted the Surface Mining and Reclamation Act (SMARA), which, among other things, provided guidelines for the classification and designation of mineral lands. Areas are classified on the basis of geologic factors without regard to existing land use and land ownership. The areas are categorized into four Mineral Resource Zones (MRZs): MRZ-1: An area where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence; MRZ-2: An area where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence; MRZ-3: An area containing mineral deposits, the significance of which cannot be evaluated; and MRZ-4: An area where available information is inadequate for assignment to any other MRZ zone.

As shown in Figure 6-4 of the City's General Plan, the Project site is located within MRZ-3. Additionally, the site has not been historically used for the extraction of mineral resources. Therefore, development of the site would not result in the loss of availability of a known mineral resource and no impacts would occur.

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

No Impact. As discussed in Response 6.3.12(a), no known valuable mineral resources exist on or near the Project site, and no mineral resource extraction activities occur on the site. In addition, the Project site has not been historically used for mineral resource extraction. Therefore, no impacts related to the loss of availability of a locally important mineral resource recovery site, as delineated on a local general plan, specific plan, or other land use plan, would occur as a result of Project implementation.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

None.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
13. NOISE. 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 the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

The discussion below is based on the City Center Noise Impact Analysis prepared by Urban Crossroads, included as Appendix I.

Noise Element of the General Plan

The City's General Plan Noise Element (Section 7.5) establishes limitations on sound levels to be received by various land uses. New development may cause existing noise-sensitive land uses to be affected by noise generated from new developments, or it may locate a sensitive use in such a place that it is adversely affected by noise. Of particular attention to the City of Redlands are noise levels near loud transportation corridors, including roadways, the airport, railways. The Noise Element also states that typical noise standards for sensitive land uses include 60 dBA CNEL for exterior areas and 45 dBA CNEL for interior areas for single family, duplex, and multiple family land uses.

Municipal Code

Section 8.06.070 and Section 8.06.080 of the City's Municipal Code outline the exterior and interior noise standards for stationary noise sources, as shown in Table N-1 below.

Table N-1: Significance Thresholds

Receiving Land Use Category	Exterior Time Period	Exterior Noise Level - dBA	Interior Time Period	Interior Noise Level - dBA
Residential districts; public space; institutional	10:00 P.M. - 7:00 A.M.	50 dBA Leq	Anytime	45 dBA Leq
	7:00 A.M. - 10:00 P.M.	60 dBA Leq		
Commercial	10:00 P.M. - 7:00 A.M.	60 dBA Leq	Anytime	50 dBA

	7:00 A.M. - 10:00 P.M.	65 dBA Leq		

Source: City of Redlands's Municipal Code Sections 8.06.070 and 8.06.080

In addition, it is unlawful to cause the noise level on any residential property to exceed these interior noise standards:

1. For a cumulative period of more than 5 minutes in any hour;
2. Plus 5 dB(A) for a cumulative period of more than 1 minute in any hour; or
3. Plus 10 dB(A) for any period of time.

Section 8.06.120 of the City's Municipal Code states that the noise standards shall not apply to noise sources associated with new construction, remodeling, rehabilitation, or grading of any private property, provided such activities take place between the hours of 7:00 am and 8:00 pm on weekdays, including Saturdays, with no activity taking place at any time on Sundays or federal holidays. In addition, all motorized equipment used in such activities are required to be equipped with functioning mufflers.

Existing Noise Levels

As detailed in the Noise Impact Analysis (Appendix I), to identify the existing ambient noise level environment, 24-hour noise level measurements were taken at six locations in the Project study area. The long-term noise level measurements were positioned as close to the nearest sensitive receiver locations, as possible to assess the existing ambient hourly noise levels surrounding the Project site. See Figure N-1, *Noise Measurement Locations*.

A description of the locations and the existing noise levels are provided in Table N-2.

Table N-2: 24-Hour Ambient Noise Level Measurements

Location[1]	Description	Energy Average Noise Level (dBA L_{eq})[2]	
		Daytime	Nighttime
L1	Located north of the Project site near single-family residence at 321 West State Street.	49.3	48.0
L2	Located southeast of the Project site near single-family residence at 124 West Vine Street.	58.8	59.4
L3	Located south of the Project site near Cortner Chapel at 221 Brookside Avenue.	55.3	53.8
L4	Located west of the Project site near single-family residence at 18 Kendall Street.	52.7	56.5

[1] See Figure N-1 for the noise level measurement locations.
[2] Energy (logarithmic) average levels. The long-term 24-hour measurement worksheets are included in Appendix I
"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.
Source: Urban Crossroads, 2022 (Appendix I)

Sensitive receptors adjacent to the Project site are shown in Figure N-2, *Receiver Locations*.

R1: Location R1 represents existing noise sensitive residence at 321 West State Street, approximately 71 feet north of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receiver R1 is placed at the building façade. A 24-hour noise measurement was taken near this location, L1, to describe the existing ambient noise environment.

R2: Location R2 represents the existing noise sensitive residence at 124 West Vine Street, approximately 370 feet southeast of the Project site. Receiver R2 is placed at the private outdoor living areas (backyards) facing the Project site. A 24-hour noise measurement was taken near this location, L2, to describe the existing ambient noise environment.

R3: Location R3 represents the existing noise sensitive Cortner Chapel at 221 Brookside Avenue, approximately 135 feet south of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receiver R3 is placed at the building façade. A 24-hour noise measurement was taken near this location, L3, to describe the existing ambient noise environment.

R4: Location R4 represents the existing noise sensitive residence at 11204 Lilac Avenue, approximately 11 feet west of the Project site. Receiver R4 is placed at the private outdoor living areas (backyards) facing the Project site. A 24-hour noise measurement was taken near this location, L4, to describe the existing ambient noise environment.

Figure N-1 Noise Measurement Locations



Figure N-2: Receiver Locations



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?

Less Than Significant Impact.

Construction

As described above, General Plan and Municipal Codes do not identify specific construction noise level limits and Section 8.06.120 of the City's Municipal Code exempts construction noise between the hours of 7:00 am and 8:00 pm on weekdays, including Saturdays, with no activity taking place at any time on Sundays or federal holidays. The Project would comply with the City's construction hours regulations, as verified by standard City Conditions of Approval. Neither the City's General Plan nor Municipal Code establish numeric maximum acceptable construction source noise levels at potentially affected receivers, which would allow for a quantified determination of what CEQA constitutes a substantial temporary or periodic noise increase. Thus, a construction-related noise level threshold is applied from the Criteria for Recommended Standard: Occupational Noise Exposure prepared by the National Institute for Occupational Safety and Health (NIOSH). A division of the U.S. Department of Health and Human Services, NIOSH identifies a noise level threshold based on the duration of exposure to the source. To evaluate whether the Project would generate potentially significant short-term noise levels at off-site sensitive receiver locations a construction-related NIOSH noise level threshold of 85 dBA Leq is used (Urban Crossroads, 2022).

The highest construction noise levels are expected to occur when the temporary construction activities take place at the closest point for the center of Project construction activity to each of any nearby sensitive receiver locations. Noise generated by construction equipment would include a combination of trucks, power tools, concrete mixers, and portable generators that when combined can reach high levels, as shown on Table N-3. Construction of the proposed Project is anticipated to occur in the following stages:

- Site Preparation
- Grading
- Building Construction
- Paving
- Architectural Coating

The noise generated from construction of the Project has been estimated using reference construction equipment noise levels and the CadnaA noise prediction model, which are listed in Table N-4, below. For each phase of construction, the nearest piece of equipment was analyzed at the closest distance of the proposed activity to the nearest sensitive receptor. Construction noise would be temporary in nature as the operation of each piece of construction equipment would not be constant throughout the construction day, and equipment would be turned off when not in use. The typical operating cycle for a piece of construction equipment involves one or two minutes of full power operation followed by three or four minutes at lower power settings.

Table N-3: Construction Equipment Noise Levels

Construction Stage	Reference Construction Activity[1]	Reference Noise Level @ 50 Feet (dBA L_{eq})	Highest Reference Noise Level (dBA L_{eq})
Site Preparation	Crawler Tractors	77	77
	Hauling Trucks	71	
	Rubber Tired Dozers	71	
Grading	Graders	79	79
	Excavators	64	

	Compactors	67	
Building Construction	Cranes	67	72
	Tractors	72	
	Welders	65	
Paving	Pavers	70	70
	Paving Equipment	69	
	Rollers	69	
Architectural Coating	Cranes	67	67
	Air Compressors	67	
	Generator Sets	67	

[1] Update of noise database for prediction of noise on construction and open site expressed in hourly average L_{eq} based on estimated usage factor.
Source: Urban Crossroads, 2022 (Appendix I)

The noise volumes in Table N-3 were applied to the locations of the closest sensitive receptors, the closest of which is R4, the backyard of the existing residence on Kendall Street. To assess the worst-case construction noise levels, the Project construction noise analysis relies on the highest noise level impacts when the equipment with the highest reference noise level is operating at the closest point from the edge of primary construction activity (Project site boundary) to each receiver location. As shown in Table N-4, the unmitigated construction noise levels are expected to range from 61.5 to 76.1 dBA L_{eq}, which would satisfy the 85 dBA L_{eq} significance threshold. Therefore, the noise impacts due to Project construction noise would be less than significant at all noise sensitive receiver locations.

Table N-4: Construction Equipment Noise Level Compliance

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})					
	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	Highest Levels[2]
R1	69.1	71.1	64.1	62.1	59.1	71.1
R2	59.5	61.5	54.5	52.5	49.5	61.5
R3	65.9	67.9	60.9	58.9	55.9	67.9
R4	74.1	76.1	69.1	67.1	64.1	76.1

[1] Construction noise source and receiver locations are shown on Figure N-2.
[2] Construction noise level calculations based on distance from the project site boundaries (construction activity area) to nearby receiver locations. CadnaA construction noise model inputs are included in Appendix I.
Source: Urban Crossroads, 2022 (Appendix I)

Operations

Development of the proposed Project would result in a mixed-use development with 131 multi-family dwelling units, amenity areas, and 10,550 SF of restaurant space. Potential long-term noise impacts associated with Project operation would include exterior traffic noise, operational noise, and stationary equipment noise.

Traffic Noise

The Project would generate 1,751 daily trips, including 143 trips during the AM peak hour and 133 trips during the PM peak hour (EPD 2022). The noise generated from these vehicular trips has been identified through utilization of the FHWA Roadway Noise Model, and a comparison of noise generated by traffic volumes with and without the Project is provided in Table N-5.

Neither the General Plan nor Municipal Code quantifies what constitutes a significant degradation of the future acoustic environment. Therefore, thresholds from the FTA T*ransit Noise and Vibration Impact Assessment* (2018) have been utilized, which identifies noise impacts by comparing the existing noise levels and the future noise levels with the proposed Project. Based on the FTA guidance, a substantial increase in ambient noise from vehicular traffic could occur when the noise levels at noise-sensitive land uses (e.g., residential, etc.) are less than 60 dBA CNEL and the Project creates an increase of 3 dBA CNEL or greater noise level increase; or when noise levels range from 60 to 65 dBA CNEL and the Project creates 2 dBA CNEL or greater noise level increase.

Table N-5 shows that in the 2025 buildout year, the cumulative plus Project off-site traffic noise level increases range from 0.0 to 0.8 dBA CNEL. Therefore, land uses adjacent to the study area roadway segments would experience less than significant noise level impacts due to unmitigated Project-related traffic noise levels.

Table N-5: Existing Cumulative With Project Traffic Noise Level Increases

ID	Road	Segment	Receiving Land Use[1]	CNEL at Receiving Land Use (dBA)[2]			Noise-Sensitive Land Use?	Incremental Noise Level Increase Threshold[3]	
				No Project	With Project	Project Addition		Limit	Exceeded?
1	Eureka St.	n/o Redlands Blvd.	Non-Sensitive	67.9	68.4	0.5	No	5.0	No
2	Eureka St.	s/o Redlands Blvd.	Non-Sensitive	67.0	67.8	0.8	No	5.0	No
3	Eureka St.	s/o Citrus Ave.	Sensitive	60.5	60.8	0.3	Yes	3.0	No
4	Brookside Ave.	e/o Eureka St.	Non-Sensitive	65.7	66.4	0.7	No	5.0	No
5	Brookside Ave.	w/o Eureka St.	Sensitive	66.3	66.4	0.1	Yes	1.5	No
6	Brookside Ave.	e/o Center St.	Sensitive	65.6	65.7	0.1	Yes	1.5	No
7	Redlands Blvd.	w/o Eureka St.	Non-Sensitive	70.2	70.3	0.1	No	3.0	No
8	Redlands Blvd.	e/o Eureka St.	Non-Sensitive	70.1	70.3	0.2	No	3.0	No

[1] Based on a review of existing aerial imagery. Noise sensitive uses limited to existing residential land uses.
[2] The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.
[3] Does the Project create an incremental noise level increase exceeding the significance criteria?
Source: Urban Crossroads, 2022 (Appendix I)

Operational Noise

It is expected the onsite Project-related noise sources would include sources such as roof-top air conditioning units, trash enclosure activity, parking lot vehicle movements, outdoor gatherings, and outdoor pool/spa activity. Using the reference noise levels to represent the proposed Project operations, operational source noise levels were calculated that are expected to be generated at the Project site and the Project-related noise level increases that would be experienced at each of the sensitive receiver locations. The City's Municipal Code Section 8.06.070 does not allow exterior noise to substantially exceed 50 dBA between 10:00 p.m. and 7:00 a.m., and 60 dBA between 7:00 a.m. and 10:00 p.m. As shown in Table N-6, the daytime hourly noise levels at the off-site receiver locations are expected to range from 38.5 to 43.6 dBA L_{eq}. The nighttime hourly noise levels at the off-site receiver locations are expected to range from 37.1 to 42.4 dBA L_{eq}.

Table N-6: Project Operational Noise Level Compliance

Receiver Location[1]	Project Operational Noise Levels (dBA Leq)		Noise Level Standards (dBA Leq)[2]		Noise Level Standards Exceeded?[3]	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime

R1	42.5	41.1	60	50	No	No
R2	38.5	37.1	60	50	No	No
R3	42.0	40.8	60	50	No	No
R4	43.6	42.4	60	50	No	No

[1] See Figure N-2 for the receiver locations.
[2] City of Redlands Municipal Code, Section 8.06.070 (Appendix 3.1)
[3] Do the estimated Project operational noise source activities exceed the noise level standards?
"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.
Source: Noise Impact Analysis, 2022 (Appendix I)

Table N-6 shows the operational noise levels associated with the Project would satisfy the City's 60 dBA L_{eq} daytime and 50 dBA L_{eq} nighttime exterior noise level standards at all nearby receiver locations. The differences between the daytime and nighttime noise levels are largely related to the duration of noise activity. Noise activity associated with the trash enclosures, courtyard, paseo, and pool/spa are expected to be limited to the daytime hours between 7:00 a.m. and 10:00 p.m. The Noise Impact Analysis prepared by Urban Crossroads, included as Appendix I includes the detailed noise analysis of operational noise levels from each noise source and activity, as well as model inputs including the existing perimeter walls used to estimate the Project operational noise levels presented in this section.

To describe the Project operational noise level contributions, the Project operational noise levels were combined with the existing ambient noise levels measurements for the nearby receiver locations to determine the Project increase. The Federal Interagency Committee on Noise (FICON) developed guidance to be used for the assessment of project-generated increases in noise levels that consider the ambient noise level. FICON identifies a readily perceptible 5 dBA or greater project-related noise level increase is considered a significant impact when the noise criteria for a given land use is exceeded. Per the FICON, in areas where the without project noise levels range from 60 to 65 dBA, a 3 dBA barely perceptible noise level increase appears to be appropriate for most people. When the without project noise levels already exceed 65 dBA, any increase in community noise louder than 1.5 dBA or greater is considered a significant impact if the noise criteria for a given land use is exceeded, since it likely contributes to an existing noise exposure exceedance.

As indicated on Tables N-7 and N-8 the Project would generate an unmitigated daytime and nighttime operational noise level increases ranging from 0.0 to 0.8 dBA Leq at the nearby receiver locations. Project-related operational noise level contributions the increases at the sensitive receiver locations would be less than significant.

Table N-7 Daytime Project Operational Noise Level Contributions

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria	Increase Criteria Exceeded?
R1	42.5	L1	49.3	50.1	0.8	5.0	No
R2	38.5	L2	58.8	58.8	0.0	5.0	No
R3	42.0	L2	58.8	58.9	0.1	5.0	No
R4	43.6	L3	55.3	55.6	0.3	5.0	No

[1] See Figure N-2 for the receiver locations.
[2] Total Project daytime operational noise levels as shown on Table N-6
[3] Reference noise level measurement locations as shown on Figure N-1
[4] Observed daytime ambient noise levels as shown on Table N-2.
[5] Represents the combined ambient conditions plus the Project activities.
[6] The noise level increase expected with the addition of the proposed Project activities.
Source: Noise Impact Analysis, Appendix I

Table N-8 Nighttime Operational Noise Level Contributions

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria	Increase Criteria Exceeded?
R1	41.1	L1	48.0	48.8	0.8	5.0	No
R2	37.1	L2	59.4	59.4	0.0	5.0	No
R3	40.8	L2	59.4	59.5	0.1	5.0	No
R4	42.4	L3	53.8	54.1	0.3	5.0	No

[1] See Figure N-2 for the receiver locations.
[2] Total Project nighttime operational noise levels as shown on Table N-7
[3] Reference noise level measurement locations as shown on Figure N-2
[4] Observed nighttime ambient noise levels as shown on Table N-2
[5] Represents the combined ambient conditions plus the Project activities.
[6] The noise level increase expected with the addition of the proposed Project activities.
Source: Urban Crossroads, 2022 (Appendix I)

Therefore, the operational noise impacts are considered less than significant at the nearby noise-sensitive receiver locations.

The Project is required to satisfy the City of Redlands 45 dBA CNEL residential interior noise level standards as a part of the permit issuance and building plan check process. Additionally, operational noise from HVAC units would be required to comply with the Municipal Code Section 8.06.070, which does not allow exterior noise to substantially exceed 50 dBA for residential uses and 60 dBA for commercial uses between 10:00 p.m. and 7:00 a.m., and 60 dBA for residential uses and 65 dBA for commercial uses between 7:00 a.m. and 10:00 p.m. Compliance with the Municipal Code would ensure that a substantial permanent increase in ambient noise levels would not occur, and noise related to HVAC units would be less than significant.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant with Mitigation Incorporated.

Construction

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. It is expected that ground-borne vibration from Project construction activities would cause only intermittent, localized intrusion. The proposed Project's construction activities most likely to cause vibration impacts are:

- Heavy Construction Equipment: Although all heavy mobile construction equipment has the potential of causing at least some perceptible vibration while operating close to buildings, the vibration is usually short-term and is not of sufficient magnitude to cause building damage.
- Trucks: Trucks hauling building materials to construction sites can be sources of vibration intrusion if the haul routes pass through residential neighborhoods on streets with bumps or potholes. Repairing the bumps and potholes generally eliminates the problem.

Ground-borne vibration levels resulting from construction activities occurring within the Project site were estimated by data published by the Federal Transit Administration (FTA). Construction activities that would have the potential to generate low levels of ground-borne vibration within the Project site include grading. Table N-9 presents the expected Project related vibration levels at each of the sensitive receiver locations.

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings. Decibel notation (VdB) is commonly used to measure RMS. The City

of Redlands Municipal Code, Section 8.06.020, defines the vibration perception threshold as 0.01 inches per second (in/sec) RMS. Based on FTA methodology, an RMS of 0.01 in/sec equates to 0.04 in/sec PPV. Decibel notation (VdB) serves to reduce the range of numbers used to describe human response to vibration. Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receivers for vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), vibration-sensitive equipment and/or activities. Based on the reference vibration levels provided by the FTA, a large bulldozer represents the peak source of vibration with a reference velocity of 0.089 in/sec PPV at 25 feet.

Table N-9 shows the highest construction vibration levels in PPV are expected to range from 0.019 to 0.305. Based on maximum acceptable continuous vibration threshold of 0.040 PPV (in/sec), the typical Project construction vibration levels will exceed the vibration thresholds at R4, which represents the residential Properties southwest of the Project site. As shown in Table N-9, smaller dozer would result in 0.01 PPV in/sec, which would not exceed the vibration limit. Therefore, MM N-1 is included to require Project construction plans to limit the equipment that would operate along the southwestern property line. Areas where MM N-1 applies are shown in Figure N-3. Furthermore, construction at the Project site would be restricted to daytime hours consistent with City's Municipal Code requirements, thereby eliminating potential vibration impact during the sensitive nighttime hours. As such, with implementation of MM N-1, construction vibration impacts would be less than significant.

Table N-9 Project Construction Vibration Levels

Receiver Location[1]	Distance to Const. Activity (Feet)[2]	Typical Construction Vibration Levels PPV (in/sec)[3]					Thresholds PPV (in/sec)[4]	Thresholds Exceeded?[5]
		Small bulldozer	Jack-hammer	Loaded Trucks	Large Bulldozer	Highest Vibration Level		
R1	71'	0.001	0.007	0.016	0.019	0.019	0.04	No
R2	370'	0.000	0.001	0.001	0.002	0.002	0.04	No
R3	135'	0.000	0.003	0.006	0.007	0.007	0.04	No
R4	11'	0.010	0.120	0.260	0.305	0.305	0.04	**Yes**

[1] Construction receiver locations are shown in Figure N-2.
[2] Distance from receiver location to Project construction boundary.
[3] Based on the Vibration Source Levels of Construction Equipment.
[4] City of Redlands Municipal Code Section 8.06.020
[5] Does the peak vibration exceed the acceptable vibration thresholds?
"PPV" = Peak Particle Velocity
Source: Urban Crossroads, 2022 (Appendix I)

Operation

The proposed mixed-use Project would not include any equipment that would result in high vibration levels, which are more typical for large industrial projects. While groundborne vibration within and surrounding the Project site may occur from heavy-duty vehicular travel (e.g., refuse trucks and delivery trucks) on the nearby local roadways, this would not result in significant vibration impacts to the proposed Project or surrounding sensitive uses. As such, vibration impacts associated with operation of the proposed Project would be less than significant.

Figure N-3: Mitigation Area



c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The proposed Project is not within an airport land use plan. The proposed Project is located approximately 2.6 miles southwest from the Redlands Municipal Airport; however, the Project site is located outside of the 60 and 65 dBA CNEL noise contours of the Redlands Municipal Airport. In addition, there are no private airstrips within the Project's vicinity. Therefore, proposed Project would not expose people residing or working in the Project area to excessive noise levels from aircraft. No impacts would occur from aircraft noise.

Existing Plans, Programs, or Policies

PPP N-1: The Project plans shall state the Project is required to comply with construction hours of operation outlined in Section 8.06.120 of the City's Municipal Code; construction activities shall take place between the hours of 7:00 am and 8:00 pm on weekdays, including Saturdays, with no activity taking place at any time on Sundays or federal holidays. In addition, all motorized equipment used in such activities are required to be equipped with functioning mufflers.

Mitigation Measures

MM N-1: Large loaded trucks and dozers (greater than or equal to 80,000 pounds) shall not be used within 30 feet of the southwest Property line, as shown on N-3. Instead, smaller, rubber-tired bulldozers (less than 80,000 pounds) shall be used within this area during Project construction to reduce vibration effects.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
14. POPULATION AND HOUSING. 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) Induce substantial unplanned population growth in an area, either directly or indirectly?

Less Than Significant Impact. The proposed Project would develop the Project site to provide 131 multi-family dwelling units and 10,550 SF of restaurant space. Additionally, the Project would include a 9,770 SF roof deck, 7,380 SF pool plaza, 5,356 SF spa plaza, and 527 SF upper lounge. According to the City of Redlands General Plan EIR, the city has an average of 2.65 persons per household and is expected to by 4,355 residential units and 10,964 persons by 2035 with buildout of the General Plan, according. However, this 2.65 person per household ratio considers all housing types within the city, including single-family residences, which consists of 68 percent of the housing within the city and typically attracts and accommodates larger household sizes.

The proposed Project's unit mix consists of 40 studios, 82 one-bedroom units, and 9 two-bedroom units. The size of the units would range size from 517 SF studios to approximately 1,252 SF two-bedroom units. These are smaller multi-family units that would not accommodate or attract large households. The proposed unit mix and smaller unit size of the Project suggests an orientation towards singles and young families that differ significantly in demographic features from the relatively large average Redlands household size of approximately 2.65 members per household.

Therefore, a more accurate calculation of the anticipated population that would be generated by the proposed Project was determined by utilizing U.S. Census data for a market area that represents similar multi-family residential housing types and costs of rent. As shown in Table POP-1, at full occupancy the Project would house approximately 191 residents.

Table POP-1: Anticipated Residents at Full Occupancy

Unit Type	Number of Units	Persons per Unit[1]	Total Residents
Studio	40	1.31	53
One-bedroom	82	1.42	117
Two-bedroom	9	2.26	21
Total	**131**	**-**	**191**

[1]Persons per unit retrieved from Census American Community Survey (ACS) 2019 Microdata Sample (PUMS)

The 191 residents at full occupancy would constitute a 0.18 percent increase over the 2020 City of Redlands population of 73,168 (US Census). It is projected that the city will experience a population increase of approximately 11,300 residents or approximately 16.3 percent from 2016 to 2045. Thus, the population

of the Project would be within the projected population growth, based on the US Census and within the growth projected in the City's General Plan EIR. Similarly, SCAG anticipates the number of housing units throughout the County would increase by 6,400 units or approximately 26.2 percent from 2016 to 2045. Thus, the 131 new multi-family units would also be within the SCAG projected growth. The Project would also help provide the needed numbers and types of housing units identified in the City's 2013-2021 Housing Element as well as those included in the draft 2021-2019 Housing Element Update.

Based on employee generation factors utilized by SCAG, the Project would result in 1 employee for every 124 square feet of retail restaurant space. Thus, the proposed 10,550 SF of restaurant retail space, would generate approximately 85 employees at full occupancy of the restaurant retail space. As of 2017, the City of Redlands had approximately 41,609 jobs (SCAG 2019). Therefore, the additional 85 employment opportunities would be 0.2 percent of the existing jobs within the city; and therefore, would not result in induced unplanned employment growth. As such, the proposed Project would not induce substantial unplanned population growth in the area, and impacts would be less than significant.

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

No Impact. The proposed Project would not displace a substantial number of existing people or housing, as no housing currently exists onsite. The Project site would construct 131 multi-family dwelling units. Therefore, there would be no impacts related to the displacement of substantial numbers of existing people or housing.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

None.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
15. 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:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

a) Result in substantial adverse physical impacts associated with the provision of 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:

Fire protection?
Police protection?
Schools?
Parks?
Other public facilities?

***Fire Protection* – Less than Significant Impact.** Fire protection services in the Project area are provided by the Redlands Fire Department (RFD). The Fire Department provides services including fire prevention and suppression, emergency medical services, technical rescue, and hazardous materials response. The Fire Department consists of approximately 52 total sworn personnel, (including 44 firefighter/paramedics and 16 firefighter/EMTs) and covers an area of 37 square miles.

RFD operates four fire stations in the city and has mutual aid agreements with Loma Linda Stations 251 and 252 (to the west) and San Bernardino County Fire (Mentone Station 9) to the east, City of San Bernardino Station 228 and 231 to the northwest), which are facilitated by a consolidated dispatch center operated by CONFIRE. CONFIRE is a multi-agency organization that functions as the result of a 25-year Joint Powers Agreement for the collective provision of fire, rescue, and emergency medical dispatch services.

There are three fire stations within 2 miles of the site, which include the following:

- Station 261 located at 525 East Citrus Avenue, is approximately 0.6 roadway miles from the Project site. Station 261 was originally built in 1948 but was remodeled in 2002. The station provides daily staffing of 7 personnel with a medic fire engine, medic fire truck, battalion vehicle, an OES, and a reserve engine (Citygate).
- Station 264 is located at 1270 West Park Avenue, approximately 1.1 roadway miles from the Project site. The station consists of a portable building that was installed in 2009 and is staffed with 5 personnel with a medic fire engine, medic squad truck, reserve medic squad truck, and a brush engine (Citygate).
- Station 263 is located at 10 West Pennsylvania Avenue, approximately 2.0 roadway miles from the Project site. This station was developed in 1986 is staffed with three personnel daily with a medic fire engine, water tender, incident support vehicle, and a reserve engine (Citygate).

The City currently has plans to acquires sites for and to construct two new fire stations (Stations 265 and 266) in different parts of the City and relocate Station 264 based on the annual increase in calls for service and location of service need. Thus, future facilities are planned by the City to expand service coverage in other portions of the City, and would reduce the geographical coverage of the existing stations.

In 2021, RFD received 11,836 calls for service and had 72,933 residents (California Department of Finance), which results in 0.16 calls per resident. The calls for service increased by an average by 6.65 percent in the three years between October 2016 and September 2019. Additionally, approximately 45 percent of the calls for service occur simultaneously. A majority of the increased calls were for emergency medical services (Citygate), which is consistent with the City's *Fire Department Assessment and Deployment Study* (2020) that details that 63 percent of service calls in 2018/2019 were for emergency medical services. The RFD currently has a goal response time of 7 minutes, 90 percent of the time (Citygate, 2020).

The Project site is located within 2 miles of three existing fire stations. Per the Redlands Fire Department Deployment/Assessment Study, the Project site is within the 4-minute response time with congestion area (Citygate, 2020), and in the area that would meet the response time goal of 7 minutes, 90 percent of the time.

The proposed Project develop 131 multi-family residences and 10,550 SF of restaurant space on the site. Implementation of the Project would be required to adhere to California Fire Code (Title 24, Part 9 of the California Code of Regulations) included in Chapter 15.20 of the City's Municipal Code, which regulates fire-resistant construction, emergency planning, fire protection system, and appropriate emergency access throughout the site. As part of the permitting process, the Project plans would be reviewed by the City's Fire Department and the Building Division (part of the Development Services Department) to ensure that the Project plans meet the fire protection requirements for fire safety. Additionally, the proposed Project would be required to comply with City fire suppression standards including the current California Fire Code, which evaluates the Project for adequate emergency access. Thus, fire and emergency access hazards resulting in a need for additional fire services would not occur.

As described in the Section 14, *Population and Housing*, the Project would result in 191 new residents, which is a 0.18 percent increase in the City's population and within the City's projected growth. The additional population would generate an incremental increase in calls for fire and emergency medical services. Because the Project site is within 2.0 miles of three existing fire stations, the Project would be served by the existing stations, and the Project would not result in the need to construct or expand a new fire station. Thus, impacts would be less than significant.

Should the calls for service from the Project coincide with call for service from another parcel within in the same fire station response area, an increase in response times could occur. However, to reduce cumulative impacts related to fire and emergency medical services, such as response times, the General Plan EIR (page 3.13-27) directs that fire protection equipment and staffing be augmented by the City development impact fees that all development projects are required to pay. Also, as set forth in the General Plan's "Principles of Managed Development," and in the City's resolution establishing development impact fees, Resolution No. 7951, adopted April 2, 2019), the fees are to expand fire protection and emergency medical staffing and

equipment provided from existing stations and better accommodate simultaneous service calls. Further, Chapter 3.60 of the City's Municipal Code requires a public facility fee to be collected prior to the issuance of a building permit to fund the City's Public Facility Program, which includes a budget for RFD facilities. Thus, the project would be required to pay the existing City fees to be used exclusively for the planned expansion and improvement of fire protection and emergency medical services provided by RFD.

Overall, because there are three existing fire stations within 2.0 miles of the Project site, the area has adequate nearby fire facilities to serve the proposed Project in addition to the existing service needs of the area; and construction of a new or expanded fire station would not be required as a result of the proposed Project. Thus, the Project would not result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered fire protection facilities. Also, cumulative impacts related to the expanded fire protection facilities and staffing needed from population growth are planned to be augmented through development fees that are required by Chapter 3.60 of the Municipal Code and the General Plan EIR prior to the issuance of building permits. Therefore, impacts related to fire protection services would be less than significant.

***Police Protection* – Less Than Significant Impact.** The City of Redlands receives public safety services from the Redlands Police Department. The main police station is located at 1270 West Park Avenue, with four other divisions located citywide. The Police Department personnel is made up of approximately 100 volunteers, 80 sworn officers and 58 full and part-time civilians, resulting in a service level of 1.12 officers per 1,000 residents. In 2020, the Department had an average response time of 9.08 minutes for Priority one police service calls and a service ratio of 1.1 officers per 1,000 residents. Although there are no industry standards for response time to emergency calls, according to the Redlands Police Department, a response time of 4.5 minutes is desirable in a city of this size.

Due to the increase in onsite people that would occur from implementation of the Project, an incremental increase in demand for police protection would occur. As described previously, the residential population of the Project site at full occupancy would be approximately 191 residents and based on the Police Department's staffing of 1.1 officers per 1,000 residents, the proposed Project would not require an additional officer.

Since the need by the Project is less than one officer, the Project would not require the construction or expansion of the City's existing policing facilities and development impact fees would contribute to the cost of hiring one additional officer. Thus, substantial adverse physical impacts associated with the provision of new or expanded facilities would not occur. In addition, the Project Applicant/Developer would be required to pay any applicable development impact fees pursuant to the Redlands Municipal Code, included as PPP PS-3 below. Therefore, impacts related to police services would be less than significant.

***Schools* – Less Than Significant Impact.** The Project site is located within the Redlands Unified School District (RUSD), which serves Redlands and the surrounding communities of Mentone and Crafton, as well as Loma Linda and the eastern portion of Highland. There are currently 17 elementary schools, five middle schools, and six high schools within the RUSD. The schools that serve the site are listed below:

- McKinley Elementary School located at 645 W Olive Avenue, which is 0.33 miles from the Project site.
- Cope Middle School located at 1000 W Cypress Avenue, which is 0.8 miles from the Project site.
- Redlands High School located at 840 E Citrus Avenue, which is 0.85 miles from the Project site.

The Project would develop 131 multi-family residences. The RUSD student generation rate for multi-family residences is 0.21 students per residence for grades K-6; 0.06 students per residence for grades 7-8; and 0.09 students per residence for grades 9-12. As shown in Table PS-1 below, based on the existing capacity of the schools serving the Project area, and the number of students that would be generated by the Project, the existing elementary, middle, and high school would be able to serve the Project.

Table PS-1: School Capacity and Project Generated Students

School	Enrollment Capacity	2021-2022 Enrollment[1]	Existing Remaining Capacity	Students Generated by Project	Remaining Capacity with Project
McKinley Elementary School	511	339	172	28	144
Cope Middle School	1,507	1,287	220	8	212
Redlands High School	3,930	2,233	1,697	12	1,685

[1] Source: City of Redlands Revised Draft Environmental Impact Report of the Redlands General Plan Update and Climate Action Plan, Table 3.13-3: Redlands Unified School District Enrollment; 2020-2021 Enrollment Data obtained from the California Department of Education, Accessed: https://dq.cde.ca.gov/dataquest/

As shown, the schools serving the Project have additional capacity to serve the population increase associated with the proposed Project. In addition, pursuant to Government Code Section 65995 et seq., the need for additional school facilities is addressed through compliance with school impact fee assessment. SB 50 (Chapter 407 of Statutes of 1998) sets forth a state school facilities construction program that includes restrictions on a local jurisdiction's ability to condition a project on mitigation of a project's impacts on school facilities in excess of fees set forth in the Government Code. These fees are collected by school districts at the time of issuance of building permits for development projects. Pursuant to Government Code Section 65995 applicants shall pay developer fees to the appropriate school districts at the time building permits are issued; and payment of the adopted fees provides full and complete mitigation of school impacts. Therefore, with implementation of PPP PS-1, which would require the payment of applicable school development impact fees pursuant to Government Code Section 65995, impacts related to school facilities would be less than significant.

***Parks* – Less Than Significant Impact.** As discussed in Response 6.3.16(a) below, according to the City's General Plan Parks and Recreational Open Space Element (Section 7.2), there are several different kinds of parks in Redlands, including community parks, neighborhood parks, and pocket parks. The City establishes a parkland/recreational space standard of 5 acres per 1,000 residents, consistent with State law. The current (as of 2016) parkland exceeds this standard with a total parkland area of 424.2 acres. The parks closest to the Project site include the following:

- Smiley Park located at 101 Parkwood Drive, which is 0.3 miles from the Project site. This park is 9.42 acres and contains the following facilities: trails, benches, restrooms, and open grassy areas.
- Jennie Davis Park located at 899 Redlands Boulevard, which is 0.5 miles from the Project site. This park is 5.2 acres and contains the following facilities: picnic tables, seating, open grassy area, and a playground.
- Sylvan Park located at 601 N University St, which is 1 mile from the Project site. This park is 23 acres and contains the following facilities: baseball/softball fields, horseshoe pits, lawn bowling, open grassy areas, picnic areas, playground equipment, restrooms, shuffleboards, a stage/bandstand area, trails/nature study, and volleyball.

The Project would develop a new mixed-use development which would result in 131 new multi-family residences and an increase in the use of public parks. The Project would result in a demand for .96 acres of parkland/open space. The proposed Project would include 23,467 SF (0.53 acre) of common open space which includes landscaped plazas, courtyards, a private pool, and private spa. A portion of the Project's Park demand would be met onsite with the provision of 23,467 SF of open space area, consisting of a pool, sitting areas, garden areas, walkways, and courtyards. In addition, the Project would be required to pay parkland fees pursuant to Municipal Code Chapter 3.32, which requires that open space and parks fees shall be collected from all applicants for development projects (included as PPP PS-2), which would be used for the purpose of acquiring, developing, improving and expanding open space

and park lands identified in the City's open space and park lands acquisition and development capital improvement plan in accordance with the amounts established by resolution of the City Council. The city currently has over 424.2 acres of parkland, with 37.6 acres within one mile of the Project site. Therefore, with implementation of PPP PS-2, which would require the payment of applicable park related fees, impacts related to the need to provide new or altered park and recreation facilities in order to maintain acceptable service ratios would be less than significant.

***Other Services* – Less Than Significant Impact.** The proposed Project would develop the Project site with 131 residential units. The new residences would result in a limited incremental increase in the need for additional services, such as public libraries and post offices, etc. Because the Project area is already served by other services and the Project would result in a limited increase in residences, the Project would not result in the need for new or physically altered facilities to provide other services, the construction of which could cause significant environmental impacts. Therefore, impacts would be less than significant.

Existing Plans, Programs, or Policies

PPP PS-1: Schools Development Impact Fees. Prior to issuance of building permit, the Developer shall pay applicable school development impact fees levied by the Redlands Unified School District pursuant to the School Facilities Act (Senate Bill [SB] 50, Stats. 1998, c.407).

PPP PS-2: Park Fees. As a Condition of Approval of a tentative map, the Developer shall pay applicable park related fees pursuant to Redlands Municipal Code Chapter 3.32.

PPP PS-3: Development Impact Fees. As a standard requirement and included as a Condition of Approval for the Project, and prior to issuance of any building permits for the Project, the Developer shall pay all applicable City of Redlands Development Impact Fees (DIF) pursuant to the Redlands Municipal Code and/or adopted fee schedules.

Mitigation Measures

None.

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

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that physical deterioration of the facility would be accelerated?

Less Than Significant Impact. According to the City's General Plan Parks and Recreational Open Space Element (Section 7.2), there are several different kinds of parks in Redlands, including community parks, neighborhood parks, and pocket parks. In addition to parks, the City of Redlands contains various recreational facilities, including the Redlands Community Center, the Community Senior Center, the Joslyn Senior Center, neighborhood community gardens, and the Carriage House. This also includes large open spaces, including the San Timoteo Canyon, Live Oak Canyon, and the Crafton Hills, which also provide recreational space.

The City establishes a parkland/recreational space standard of five acres per 1,000 residents, consistent with State law. As discussed previously, the Project would develop a new mixed-use development including a 131-unit multi-family residential development, which would result in 191 new residents and a modest increase in the use of public parks. Based on this formula, the Project would result in a demand for 0.96 acres of parkland/recreational space. The Project would be required to pay parkland fees pursuant to Municipal Code Chapter 3.32, which requires that open space and parks fees shall be collected from all applicants for development projects (included as PPP PS-2), which would be used for the purpose of acquiring, developing, improving and expanding open space and park lands identified in the City's open space and park lands acquisition and development capital improvement plan in accordance with the amounts established by resolution of the City Council. In addition, as described previously, the city currently has over 424.2 acres of parkland, with 37.6 acres within one mile of the Project site. Therefore, impacts related to the increase the use of existing parks and recreational facilities, such that physical deterioration of the facility would be accelerated would be less than significant.

b) Require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less than Significant Impact. The proposed Project would include 23,467 SF of common open space area including recreational community amenities consisting of a pool, spa, sitting areas, and gathering spaces for use by residents within the complex. In addition, private patio space would be available to residents in designated floor plans. The impacts of development of the common open space areas are considered part of the impacts of the proposed Project as a whole and are analyzed throughout the various sections of this document. For example, activities such as excavation, grading, and construction as required for the Project,

including open space areas, are analyzed in the Air Quality, Greenhouse Gas Emissions, Noise, and Transportation Sections.

In addition, as discussed above, the Project would contribute park development fees pursuant to Municipal Code Chapter 3.32 to be used towards the future expansion or maintenance parks and recreational facilities, these fees are standard with every residential development, and the proposed Project would not require the construction or expansion of other recreational facilities that might have an adverse physical effect on the environment. As a result, impacts would be less than significant.

Existing Plans, Programs, or Policies

PPP PS-2: Park Fees. Listed previously in Section 15, Public Services.

Mitigation Measures

None.

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

The discussion below is based on the VMT Screening Analysis for the City Center Project, prepared by EPD Solutions, April 26, 2022 (Appendix J).

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact. The proposed Project involves the construction of a mixed-use development with 131 multi-family dwelling units and 10,550 SF of restaurant space. Vehicular traffic to and from the Project site would utilize the existing network of regional and local roadways that currently serve the Project area.

A trip generation was prepared for the Project by EPD Solutions (Appendix J). As shown on Table T-1, the mixed-use development would generate approximately 1,751 weekday daily trips, with 143 trips produced in the weekday AM peak hour and 133 trips produced in the weekday PM peak hour.

Table T-1: Project Trip Generation

Land Use	AM Peak Hour			PM Peak Hour			Daily
	In	Out	Total	In	Out	Total	
Multi-Family Housing[1]	23	18	42	16	22	38	622
High-Turnover Sit-Down Restaurant[2]	55	45	101	58	37	95	1,129
Project Trip Generation	**79**	**64**	**143**	**74**	**59**	**133**	**1,751**

[1] Trip rates from the Institute of Transportation Engineers, *Trip Generation, 11th Edition,* 2021. Land Use Code 221-Multifamily Housing (Mid-Rise). Close to rail transit.
[2] Trip rates from the Institute of Transportation Engineers, *Trip Generation, 11th Edition,* 2021. Land Use Cod 932- High-Turnover (Sit-Down) Restaurant
Source: EPD Solutions (Appendix J)

The Project has been designed to construct onsite roadway improvements consistent with the City guidelines. Additionally, the Project would pay Development Impact Fees as conditioned by the City. The fees shall be collected and utilized as needed by the City to construct the improvements necessary to maintain the required Level of Service (LOS) and build or improve roads to their build-out level.

Alternative Transportation

The proposed Project would construct onsite sidewalks and provide new sidewalks on Eureka Street and Brookside Avenue to provide access to the Arrow Line located approximately 0.26-mile from the Project site. Additionally, the Project would not impact the existing bicycle lane on Brookside Avenue. As such, the proposed Project would enhance pedestrian and bicycle access in the Project vicinity. Therefore, the Project would not conflict with alternative transportation and Project impacts to transit, bicycle, and pedestrian facilities would be less than significant.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less Than Significant Impact. Senate Bill 743 (SB 743) was signed into law on September 27, 2013 and changed the way that public agencies evaluate transportation impact under CEQA. A key element of this law is the elimination of using auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant transportation impacts under CEQA. The legislative intent of SB 743 was to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas (GHG) emissions." According to the law, "traffic congestion shall not be considered a significant impact on the environment" within CEQA transportation analysis.

SB 743 does not prevent a city or county from continuing to analyze delay or LOS as part of other plans (i.e., a city's General Plan), studies, congestion management and transportation improvements, but these metrics may no longer constitute the basis for transportation impacts under CEQA analysis as of July 1, 2020. For example, in the City, the General Plan identifies LOS as being a required analysis, and even though it will no longer be a requirement of CEQA, unless the General Plan is amended, LOS will continue to be analyzed as part of project review independent of CEQA analysis.

The Governor's Office of Planning and Research (OPR) updated the CEQA Guidelines to establish new criteria for determining the significance of transportation impacts. Based on input from the public, public agencies, and various organizations, OPR recommended that Vehicle Miles Traveled (VMT) be the primary metric for evaluating transportation impacts under CEQA.

The City of Redlands has prepared Draft VMT analysis guidelines, which were accepted by the City Council on July 21, 2020; therefore, the City's adopted guidelines were consulted to determine whether a VMT analysis would be required for the Project. The City Guidelines provides details on appropriate "screening thresholds" that can be used to identify when a proposed land use project is anticipated to result in a less-than-significant impact without conducting a more detailed analysis. Screening thresholds are broken into the following three types:

- Step 1: Transit Priority Area (TPA) Screening
- Step 2: Low VMT Area Screening
- Step 3: Project Type Screening

Consistent with guidance identified in the Technical Advisory and City Guidelines, projects located within a Transit Priority Area (TPA) (i.e., within ½ mile of an existing "major transit stop" or an existing stop along a "high-quality transit corridor") may be presumed to have a less than significant impact absent substantial evidence to the contrary. However, the presumption may not be appropriate if a project:

- Has a Floor Area Ratio (FAR) of less than 0.75;

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

As previously discussed throughout this document, the Project site is located within 0.5-mile of an existing major transit stop, and along a high-quality transit corridor. Additionally, the Project would meet the aforementioned secondary criteria of having a FAR of greater than 0.75, the parking supplied by the Project is not in excess of the City's parking code, the Project is consistent with the adopted RTP/SCS, and the Project is not replacing affordable residential units with a smaller number of market rate residential units. Additionally, the Project would meet the Step 3 VMT Screening criteria as it would result in less than 3,000 MTCO2e of GHG emissions. Therefore, the Project would meet the VMT Screening Criteria, and it is presumed that the Project would have a less than significant impact related to VMT.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. Vehicular access to the Project site would be provided via ingress and egress driveways connecting to Brookside Avenue, Eureka Street, and West Citrus Avenue. Vehicular traffic to and from the Project site would utilize the existing network of regional and local roadways that currently serve the Project area. The Project would not include any offsite street improvements, and onsite driveways would be reviewed by the City to ensure they meet City design requirements. As a result, impacts related to vehicular circulation would be less than significant.

d) Result in inadequate emergency access?

Less Than Significant Impact.

Construction

The proposed construction activities, including equipment and supply staging and storage, would occur within the Project site, and would not restrict access of emergency vehicles to the Project site or adjacent areas. The connections to existing infrastructure systems that would be implemented during construction of the proposed Project could require the temporary closure of one side or portions of Brookside Avenue, Eureka Street, and West Citrus Avenue for a short period of time (i.e., hours or a few days). However, the construction activities would be required to ensure emergency access in accordance with Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9), which would be ensured through the City's permitting process. Thus, implementation of the Project through the City's permitting process would ensure existing regulations are adhered to and would reduce potential construction related emergency access impacts to a less than significant level.

Operation

Project parking lots would be accessed from West Citrus Avenue, Brookside Avenue, and Eureka Street. The construction permitting process would provide adequate and safe circulation to, from, and through the Project area, and would provide routes for emergency responders to access different portions of the Project area. Roadways in the vicinity (including West Citrus Avenue, Brookside Avenue, and Eureka Street) would normally remain open and accessible to all vehicle traffic including emergency responders, except for possibly interim or partial closures for construction activities for a few hours or days with a City permit. Because the Project is required to comply with all applicable City codes, as verified by the City, potential impacts related to inadequate emergency access would be less than significant.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

None.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
18. TRIBAL CULTURAL RESOURCES.				
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:				
a) 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)?	☐	☒	☐	☐
b) 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?	☐	☒	☐	☐

AB 52 Requirements

The Project would be required to comply with AB 52 regarding tribal consultation. Chapter 532, Statutes of 2014 (i.e., AB 52), requires that Lead Agencies evaluate a project's potential to impact "tribal cultural resources." Such resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register or included in a local register of historical resources (PRC Section 21074). AB 52 also gives Lead Agencies the discretion to determine, supported by substantial evidence, whether a resource falling outside the definition stated above nonetheless qualifies as a "tribal cultural resource."

In compliance with these requirements, on April 8, 2022, the City sent letters to the following Native American tribes that may have knowledge regarding tribal cultural resources in the Project vicinity.

- Gabrieleno Band of Mission Indians – Kizh Nation
- Morongo Band of Mission Indians
- San Manuel Band of Mission Indians
- Soboba Band of Luiseno Indians
- Torres-Martinez Desert Cahuilla Indians

The San Manuel Band of Mission Indians requested consultation via email regarding the proposed Project. The San Manuel Band of Mission Indians consulted with City on May 3, 2022, via email, and stated that the Project site is within Serrano ancestral territory. However, the Tribe stated that due to the nature and location of the Project site, the Tribe does not have any concerns with the Project's implementation. However, the Tribe requested inclusion of mitigation for incidental discoveries of cultural resources.

a) 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)?

Less Than Significant with Mitigation Incorporated. As discussed in Section 6.3.5 of this document, Response 6.3.5(a), the records search revealed that there are no known cultural resources within the Project site. However, the San Manuel Band of Mission Indians requests that in addition to MM CUL-1, the Tribe be notified of any incidental discoveries of cultural resources and requests that a tribal monitor be retained if any incidental discoveries occur. Mitigation Measures TCR-1 has been included to require a Monitoring and Treatment Plan and Native American monitoring of excavation and grading activities if cultural resources are unearthed by Project construction activities. Therefore, the proposed Project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines or PRC Section 5020.1(k).

b) 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?

Less Than Significant with Mitigation Incorporated. As discussed above, to avoid potential adverse effects to tribal cultural resources, Mitigation Measures TCR-1 has been included to require a Monitoring and Treatment Plan and Native American monitoring of excavation and grading activities if cultural resources are unearthed by Project construction activities. No information has been provided to the Lead Agency indicating any likelihood of uncovering tribal cultural resources on the Project site, there are no known tribal cultural resources on or adjacent to the Project site, and no potentially significant impacts are anticipated. The following mitigation measure is included in the event of any inadvertent discoveries during construction activities.

Additionally, as described previously California Health and Safety Code, Section 7050.5, included as PPP CUL-1, requires that if human remains are discovered in the Project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation. If the coroner determines that the remains are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Therefore, with implementation of Mitigation Measures TCR-1, PPP CUL-1, and MM CUL-1, impacts to TCRs would be less than significant.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

MM TCR-1: The San Manuel Band of Mission Indians Cultural Resources Department shall be contacted, as detailed in MM CUL-1, of any pre-contact and/or historic-era cultural resources discovered during Project implementation, and shall 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, a Cultural Resources Monitoring and Treatment Plan shall be prepared by the Project archaeologist, in coordination with the San Manuel Band of Mission Indians, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents the San Manuel Band of Mission Indians for the remainder of the Project, should the San Manuel Band of Mission Indians elect to place a monitor onsite.

Any and all archaeological and cultural documents created as part of the Project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the Applicant and the City of Redlands Development Services Department for dissemination to the San Manuel Band of Mission Indians.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
19. UTILITIES AND SERVICE SYSTEMS. Would the Project:				
a) Require or result in the relocation or construction of new or expanded water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State 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) Require or result in the relocation or construction of new or expanded water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact.

Water Infrastructure

The Municipal Utilities and Engineering Department (MUED) maintains the water system in the City of Redlands. The proposed Project would redevelop the Project site, which is currently served by MUED's water infrastructure, and would install new onsite potable water infrastructure that would connect to existing 12-inch domestic water lines in Brookside Avenue and Eureka Street. Additionally, the Project would install fire water lines onsite that would connect to the existing and proposed 12-inch domestic water lines in Brookside Avenue and Eureka Street. Within Brookside Avenue, an 8-inch dry non-potable water line will be constructed adjacent to the project site for future irrigation of the site. The new onsite water system would convey water supplies to the proposed residences and landscaping through plumbing/landscaping fixtures that are compliant with the CalGreen Plumbing Code for efficient use of water.

Table UT-1: Proposed Project Estimated Water Demand

Land Use Type	DU/Acreage	Unit Water Demand Factor[1]	Daily Water Usage (gpd)	Annual Water Usage (AFY)
Residential Multi-Family	131 DU	210 gpd/DU	27,510 gpd	30.8 AFY

Retail Commercial (Restaurant)	0.24 acres	2,178 gpd/acre	522.72 gpd	0.59 AFY
Total Water Demand				**31.39 AFY**

[1]City of Redlands "Water and Sewer Demands Spreadsheet" (May 8, 2019)

As shown, the proposed Project would result in a water demand of 31.39 acre-feet per year (AFY). The proposed Project would continue to receive water supplies through the existing water lines located within the Brookside Avenue and Eureka Street rights-of-way that have the capacity to provide the increased water supplies needed to serve the proposed Project, and no expansions of the water pipelines that convey water to the Project site would be required. Installation of the new water distribution lines would only serve the proposed Project and would not provide new water supplies to any offsite areas.

The construction activities related to the onsite water infrastructure that would be needed to serve the proposed Project is included as part of the Project and would not result in any physical environmental effects beyond those identified throughout this document. For example, analysis of construction emissions for excavation and installation of the water infrastructure is included in Sections 6.3.3, *Air Quality* and 6.3.8, *Greenhouse Gas Emissions*. Therefore, the proposed Project would not result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects, and impacts would be less than significant.

Wastewater Treatment

The Project would install two new 14-inch onsite sewer lines that would connect to the existing 14-inch sewer line in First Street and a new 14-inch sewer line in Eureka Street that would connect to the existing 8-inch sewer line in North Eureka Street. The Project also proposes to realign existing public and private sewer lines within the site.

Wastewater demand associated with the proposed Project would be typical of residential and restaurant wastewater usage in the City of Redlands. As shown in Table UT-2, *Proposed Project Estimated Wastewater Generation*, the proposed Project would approximately 17,645 gallons per day (gpd) of wastewater.

According to the City's General Plan EIR, the City of Redlands has projected average wastewater flows of 6.75 mgd at buildout of the proposed General Plan. This projection was based on current flow per customer, scaled to the projected number of customers at buildout. As the projected flow is within the 9.5-mgd secondary treatment capacity and 7.2-mgd tertiary treatment capacity, no new or expanded treatment facilities would be needed to serve the population at buildout. In addition, all new residential development that connects to the system is required to pay its applicable fair-share Development Impact Fee(s).

Table UT-2: Proposed Project Estimated Wastewater Generation

Use	Size	Generation Rate (gpd/unit)	Total Wastewater (gpd)
Restaurant	10,550 SF	300 gpd/1,000 SF	3,165
Studio	40 du	80 gpd/du	3,200
One Bedroom	82 du	120 gpd/du	9,840
Two Bedroom	9 du	160 gpd/du	1,440
Total Project Wastewater Generation:			**17,645 gpd**

City of Los Angeles, CEQA Thresholds Guide, 2006, Exhibit M.2-12

Prior to issuance of building permits, a sewer capacity study will be prepared by the Project Applicant and submitted to the City MUED. The construction activities related to installation of the onsite sewer infrastructure that would serve the proposed Project, is included as part of the proposed Project and would not result in any physical environmental effects beyond those identified throughout this document. For example, construction emissions for excavation and installation of the sewer infrastructure is included in Section 6.3.3, *Air Quality* and 6.3.8, *Greenhouse Gas Emissions*, and noise volumes from these activities are evaluated in

Section 6.3.13, *Noise*. As the proposed Project includes facilities to serve the proposed development, it would not result in the need for construction of other new wastewater facilities or expansions, the construction of which could cause significant environmental effects. Therefore, impacts would be less than significant.

Stormwater Drainage

The proposed Project would increase the overall impervious surface area on the Project site compared to existing condition. As discussed in Section 6.3.10 of this document, the proposed Project would increase the impervious surface area on the Project site compared to existing condition, however, with implementation of BMPs, the proposed Project would install drainage features that would handle and treat all potential stormwater runoff from the Project site. Furthermore, the proposed Project would not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities beyond the onsite improvements included as part of the proposed Project. All new residential development that connects to the system is required to pay its applicable fair-share Development Impact Fee(s). Therefore, impacts to stormwater drainage facilities would be less than significant.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. Water service would be provided to the proposed project site by the City of Redlands MUED. The 2020 San Bernardino Valley Regional UWMP, adopted in June 2021, was prepared for the City of Redlands and therefore accounts for the water usage that would be attributed to development of the Project site, consistent with its existing land use designation and zoning classification. According to the UWMP, the City has four sources of water to provide to its service area: purchased imported water from the State Water Project; groundwater from the Bunker Hill Subbasin and the Yucaipa Subbasin; surface water from the Mill Creek and Santa Ana River watersheds; and recycled water (UWMP 2020).

The Water Supply Reliability Assessment within the UWMP concludes that the City has adequate supplies to meet projected demands under multiple dry year scenarios, taking into account the recent prolonged drought (UWMP 2020). Additionally, the Project would have a demand of 31.39 acre-feet per year, which is within the projected water demands and supplies as analyzed in the UWMP. Therefore, water demand from the proposed Project would be within the City's current and projected water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. All new residential development that connects to the system is required to pay its applicable fair-share Development Impact Fee(s). Thus, impacts related to water supplies would be less than significant.

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?

Less Than Significant Impact. According to the General Plan Livable Community Element, most wastewater generated by sewered development within the Planning Area is treated at the Redlands Wastewater Treatment Facility. The Redlands Wastewater Treatment Facility treats approximately 6 million gallons per day (mgd) with a capacity of 9.5 mgd. As discussed above, the proposed Project would generate approximately 17,645 gpd. All new development that connects to the system is required to pay its applicable fair-share Development Impact Fee(s). As such, the Redlands Wastewater Treatment Facility would have adequate capacity to serve the Project. The proposed Project would connect to and operate under capacity of the current water treatment facility, allowing for sufficient service to the Project area. The quality of sewage discharged from indoor plumbing fixtures would be similar to the quality of other residential dwelling units in the vicinity that currently discharge to the City's sewer system. The Project would not result in any of the wastewater treatment plants discussed above exceeding wastewater treatment requirements. Therefore, impacts related to wastewater generation are less than significant.

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?

Less Than Significant Impact. The City of Redlands Facilities and Community Services Department provides a wide range of services to the city, including waste collection. Solid waste from Redlands is primarily disposed of at the California Street Landfill and the San Timoteo Sanitary Landfill operated by the County, both within the city limits. These have more than adequate capacity to meet the City's needs for the foreseeable future. Solid waste collected from the Project site would be anticipated to be hauled to the California Street Landfill, which 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. In 2019, California Street Landfill received approximately 142 tons per day on average. As such, California Street Landfill has an additional capacity of approximately 687 tons per day. It has a remaining capacity of 5,168,182 cubic yards and is permitted to operate through 2042 (CalRecycle 2022). Additionally, 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. In 2019, San Timoteo Landfill received approximately 758 tons per day on average. As such, San Timoteo Landfill has an additional capacity of approximately 1,242 tons per day. As of CalRecycle's 2021 estimate, the remaining capacity was 12,360,396 cubic yards and is permitted to operate through 2039 (CalRecycle 2022).

Construction

Construction of the proposed Project would require site preparation, grading, and construction of new buildings and infrastructure. The majority of waste generated during demolition and construction activities would be building materials (e.g., concrete, dirt, and waste generated by construction workers). Nonhazardous waste from Project construction activities would be recycled to the extent feasible. As stated in the City's Municipal Code Section 13.66.040, *Construction and Demolition Recycling Requirements*, no demolition permit or building permit shall be issued for any development activity subject to this chapter unless the construction and demolition recycling plan has been approved by the municipal utilities director. Thus, the proposed Project would be required to meet the City's waste diversion requirements as they pertain to Project construction. Furthermore, construction waste is anticipated to be minimal compared to waste generated throughout the lifetime of the Project during operation.

Operation

As described previously in Section 6.3.14 of this document, the proposed Project includes the construction of a mixed-use development with 131 multi-family dwelling units and 10,550 SF of restaurant space that would result in an increase of approximately 191 residents on the Project site. As shown on Table UT-3, it is anticipated that the proposed Project would generate a total of approximately 0.048 ton of solid waste per day (17.47 tons per year) during Project operation.

Table UT-3: Solid Waste Generation during Project Operation

Land Use	Quantity	Generation Rate	Solid Waste Demand
Multi-Family Units[1]	131 units	0.46 tons/unit/year	60.26 tons per year
Restaurant[1]	10,550	0.0009125 tons/SF/year	9.63 tons per year
Total Solid Waste			**69.89 tons per year**
Annual Landfill Disposal with AB 341 (75% Reduction)			**17.47 tons per year**
Weekly Landfill Disposal with AB 341 (75% Reduction)			**0.34 tons per week**

[1]CalRecyle Estimated Solid Waste Generation Rates

As the California Street Landfill has the capacity to process an additional 687 tons of solid waste per day, the solid waste generated by the Project would be within the capacity of the landfill. Thus, the proposed Project would be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs and the Project would not impair the attainment of solid waste reduction goals. Impacts

related to landfill capacity would be less than significant.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. The proposed Project would result in new development that would generate an increased amount of solid waste. All solid waste-generating activities within the City is subject to the requirements set forth in the 2022 California Green Building Standards Code that requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste, and AB 341 that requires diversion of a minimum of 75 percent of operational solid waste.

In addition, as stated in Response 6.3.19(d) above, the proposed Project would be required comply with the City's Municipal Code Section 13.66.040, *Construction and Demolition Recycling Requirements*, which requires that no demolition permit or building permit shall be issued for any development activity subject to this chapter unless the construction and demolition recycling plan has been approved by the municipal utilities director. In addition, the proposed Project would be required to comply with all federal, State, and local regulations related to solid waste. Furthermore, the proposed Project would comply with all standards related to solid waste diversion, reduction, and recycling during Project construction and operation. Therefore, the proposed Project is anticipated to result in less than significant impacts related to potential conflicts with federal, State, and local management and reduction statutes and regulations pertaining to solid waste.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

None.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
20. WILDFIRES. 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 or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. According to the CAL FIRE Fire Hazard Severity Zone map, the Project site is not within an area identified as a Fire Hazard Area that may contain substantial fire risk or a Very High Fire Hazard Severity Zone (VHFHSZ) (Cal Fire 2022). The proposed Project would not substantially impair an adopted emergency response plan or emergency evacuation plan. As stated in Section 6.3.9 of this document, the proposed Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan. The City's General Plan Safety Element (Section 7.4) discusses Emergency Management, which outlines goals and policies aimed at emergency preparedness to protect the health, safety, and welfare of the general public during and after natural, man-made, or attack-related emergencies. Additionally, the proposed Project does not include any characteristics (e.g., permanent road closures or long-term blocking of road access) that would substantially impair or otherwise conflict with an emergency response plan or emergency evacuation plan. Therefore, the impacts related to emergency response and evacuation plans associated with construction of the proposed Project would be less than significant.

The proposed Project does not include any changes to public or private roadways that would physically impair or otherwise conflict with an emergency response plan or emergency evacuation plan. Further, the proposed Project would not obstruct or alter any transportation routes that could be used as evacuation routes during emergency events. In addition, during the operational phase of the proposed Project, site access would be required to comply with standards established by the City and the Redlands Fire Department. The size and location of fire suppression facilities (e.g., hydrants) and fire access routes would be required to conform to City and Fire Department standards. The Project would provide adequate

emergency access to the proposed buildings via driveways from West Citrus Avenue, Eureka Street, and Brookside Avenue. Further, access to and from the Project site for emergency vehicles would be reviewed and approved by the Redlands Fire Department and the City as part of the Project approval process to ensure the proposed Project is compliant with all applicable codes and ordinances for emergency vehicle access. Because the Project is required to comply with all applicable City codes, as verified by the City, any potential impacts related to emergency response or evacuation (if any) would be less than significant.

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?

No Impact. The proposed Project involves the development of the site with 131 multi-family residences and 10,550 SF of restaurant space. As discussed in Section 6.3.14 of this SCEA, the Project is anticipated to result in a population increase of approximately 191 residents. As stated previously, the Project site is not located within a VHFHSZ. Additionally, areas in the Project vicinity are currently developed, and therefore, lack the combustible materials and vegetation necessary for the uncontrollable spread of a wildfire.

The Project site is relatively flat and there are limited elevation changes in the Project vicinity. The Project proposes a mixed-use development in an area characterized by existing commercial, institutional, and residential uses. As such, the Project itself would not exacerbate wildfire risks as compared to existing conditions because it is representative of the existing development in the area. Thus, no impact related to other factors that would expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire would occur from the Project.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The Project does not require the installation or maintenance of associated infrastructure (including roads, fuel breaks, emergency water sources, power lines, or other utilities) that would exacerbate fire risk or that would result in impacts to the environment. Although utility improvements, including domestic water, recycled water, sanitary sewer, and storm drain lines proposed as part of the Project would be extended throughout the Project site, these utility improvements would be underground and would not exacerbate fire risk. Project design and implementation of utility improvements would be reviewed and approved by the City part of the Project approval process to ensure the proposed Project is compliant with all applicable design standards and regulations. Therefore, the proposed Project would not include infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities), that would exacerbate fire risk or that would result in 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?

Less Than Significant Impact. According to the City of Redlands General Plan, Figure 7-3, Flood Hazards, the Project site is partially within Zone AO and is within a 100-year floodplain. Additionally, in its existing condition, the Project site is flat and does not contain any significant slopes.

As established in Section 6.3.10 of this document, during Project construction soil would be compacted and drainage patterns would be temporarily altered due to grading, and there would be an increased potential for flooding compared to existing conditions. However, as stated in PPP WQ-1, construction BMPs would be identified and implemented as part of the proposed Project. Implementation of construction BMPs would control and direct surface runoff to prevent flooding, and as such, Project construction would not expose people or structures to significant risks related to downslope and downstream flooding. Therefore, impacts would be less than significant.

During operation, the proposed Project would not substantially alter the existing onsite drainage patterns. Compliance with the proposed operational BMPs would ensure on-site storm drain facilities would be sized to accommodate stormwater runoff from the Project site so that onsite flooding would not occur. Additionally, as required by Redlands Municipal Code Section 15.32.110 sets forth construction standards for new development within flood hazard areas. With implementation of the requirements set forth in Code Section 15.32.110, operation of the Project would not expose people or structures to significant risks, including downslope or downstream flooding. Therefore, impacts would be less than significant.

As established in Section 6.3.7 of this document, there are no landslide zones close to or within the boundaries of the Project site. The Project site is relatively flat; therefore, the risk of slope failure represents a limited level of concern on the Project site. Further, implementation of PPP GEO-1 requires compliance with the CBC, which would include the incorporation of: 1) seismic safety features to minimize the potential for significant effects as a result of earthquakes; 2) proper building footings and foundations; and 3) construction of the building structures so that it would withstand the effects of strong ground shaking. These features would reduce potential impacts related to landslides to a less than significant level. Therefore, with implementation of PPP GEO-1, the Project would not expose people or structures to significant risks, including downslope or downstream landslides, and impacts (if any) would be less than significant.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

None.

21. MANDATORY FINDINGS OF SIGNIFICANCE.	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("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) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact with Mitigation Incorporated. Based on the discussion in Section 6.3.4, *Biological Resources*, of this document, the proposed Project is anticipated to result in less than significant impacts related to habitat, wildlife species, and/or plant and animal communities. The proposed Project would not eliminate a plant or animal community, nor would it substantially reduce the number or restrict the range of a rare or endangered plant or animal. However, MM BIO-1 has been included to comply with the provisions of the MBTA as there are ornamental trees onsite.

As described in Section 6.3.5, *Cultural Resources*, the Project site does not contain any buildings or structures that meet any of the California Register of Historical Resources (California Register) criteria or qualify as "historical resources" as defined by CEQA. Therefore, the proposed Project would not cause a substantial adverse change in the significance of a historical resource. As described previously, the Project site has been previously disturbed from various past uses that involve grading and installation of utility infrastructure. As a result, the potential for archaeological resources exists on site are low to moderate. However, Mitigation Measure CUL-1 has been included to require archaeological monitoring of ground disturbing activities to ensure that inadvertent discovery of resources during ground-disturbing activities are less than significant. Implementation of Mitigation Measure CUL-1 and Mitigation Measure TCR-1 would reduce potential impacts to important examples of California prehistory to a less than significant level.

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)?

Less Than Significant with Mitigation Incorporated. As presented in this document, potential Project-related impacts are either less than significant or would be less than significant with mitigation incorporated. Based on the analysis contained in this document, Project-related impacts would be reduced to less than significant levels with the incorporation of mitigation measures. Given that the potential Project-related impacts would be mitigated to a less than significant level, implementation of the proposed Project would not result in impacts that are cumulatively considerable when evaluated with the impacts of other current projects, or the effects of probable future projects. Therefore, the proposed Project's contribution to any significant cumulative impacts would be less than cumulatively considerable. As discussed in Sections 6.3.1 through 6.3.20 of this document, mitigation would be required and incorporated as necessary. Therefore, impacts would be less than significant with mitigation incorporated.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant with Mitigation Incorporated. Based on the Project Description and the preceding responses in Sections 6.3.1 through 6.3.20 of this document, implementation of the proposed Project would not cause substantial adverse effects to human beings because all potentially significant impacts of the proposed Project would be mitigated to a less than significant level. Therefore, since all potentially significant impacts of the proposed Project are expected to be mitigated to a less than significant level, implementation of the proposed Project would not cause substantial adverse effects on human beings.

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