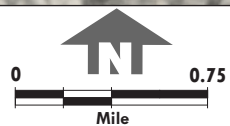


CITY OF *REDLANDS*
ENVIRONMENTAL CHECKLIST FORM
AND INITIAL STUDY

1. **Project Title:** TTM 20402
2. **Lead Agency Name and Address:**
City of Redlands
Development Services Department
35 Cajon Street, Suite 20
Redlands, CA 92373
3. **Contact Person and Phone Number:**
Sean Riley
Senior Planner
(909) 798-7555
4. **Project Location:** The 21.6-acre Project Site is located on the east side of San Timoteo Canyon Road/Nevada Street between Barton Road and San Timoteo Canyon Road in the City of Redlands (refer to Figure 1: Regional Location Map; and Figure 2: Vicinity Map). The Assessor's Parcel Numbers (APNs) are 293-132-01-0000 and 293-141-37-0000. Surrounding land uses include vacant land to the west (proposed Tentative Tract Map No. 20404 in Loma Linda), residential development to the north and east, and vacant land, rural residential to the south.
5. **Project Sponsor's Name and Address:**
Tim England
HighPointe Communities
530 Technology, Suite #100
Irvine, CA 92618
6. **General Plan Designation:** Very Low Density Residential (VLDR)
7. **Zoning:** Agricultural (A-1)
8. **Project Description:** The Applicant is requesting approval of Tentative Tract Map (TTM) 20402 to allow for the subdivision of a 21.6 acre-site into 27 single-family residential lots and five lettered lots including a 0.4-acre detention basin (Lot A), 1.6-acre open space lot (Lot B), and a total of 22,393 square feet of landscaping (Lots C, D and E). Lot sizes would be a minimum of 20,000 square-feet and range from 20,000 square-feet up to 43,719 square-feet (refer to Figure 3: Site Plan). Access to the site would be provided via two access points along San Timoteo Canyon Road (along the west and south property boundary).
9. **Surrounding Land Uses and Setting:** The Project Site was formerly an orange grove and is currently vacant. The 21.6-acre triangular-shaped parcel is relatively flat with a less than one percent slope to the southeast. Elevations within the Project Site range between 1,234 to 1,245 feet above mean sea level.

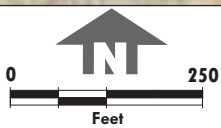


LILBURN
CORPORATION

REGIONAL LOCATION

Tentative Tract Map No. 20402
City of Redlands, California

FIGURE 1



LILBURN
CORPORATION

PROJECT VICINITY

Tentative Tract Map No. 20402
City of Redlands, California

FIGURE 2

The Project Site is designated as Very Low Density Residential (VLDR) in the City of Redlands General Plan Land Use Map. Surrounding properties to the north and east are also designated VLDR, property to the south is designated Resource Preservation, and property west of the Project Site occurs within the unincorporated area of San Bernardino County within the City of Loma Linda's Sphere of Influence and is pre-zoned Rural Residential. As shown on the City's Zoning Map, the Project Site and surrounding area occurs within the Agricultural (A-1) zone. The Project site's current zoning designation is *A-1 Agricultural District*. Under this zoning designation, single-family residences are allowed; however, individual parcels are required to be five acres or more. Although the A-1 zoning district requires parcels to be five acres or more, State Bill 330 (SB 330) allows residential density supported by the General Plan without a zone change.

The City's General Plan currently designates the Project site as *Very Low Density Residential*, which allows for the development of detached single-family dwellings at densities up to 2.7 dwelling units per acre (du/ac) on slopes of up to 15 percent. The Applicant proposing a subdivision, which will utilize the Estate Residential (R-E) zoning district's development standards to design the Project with a density that is consistent with the underlying General Plan density. The proposed density (1.3 dwelling units per gross acre) would not exceed the density limit of *Very Low Density Residential* as established in the General Plan.

10. Other public agencies whose approval is required:

None.

11. Related Technical Reports (incorporated by reference): The technical studies/reports referenced herein and listed in the References section at the end of this Initial Study were used to analyze the project. All reports are available for review at City of Redlands Development Services Department and are attached as appendices to this Initial Study.

12. Evaluation Format: This Initial Study was prepared in compliance with the California Environmental Quality Act (CEQA) Guidelines. This format of the study is presented as follows. The Project was evaluated based upon its effect on 21 major categories of environmental factors. Each factor was reviewed by responding to a series of questions regarding the impact of the project on each element of the overall factor. The Initial Study Checklist provides a formatted analysis that provides a determination of the effect of the project on the factor and its elements. The effect of the project is categorized into one of the following four categories of possible determinations:

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

1. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
2. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

3. Possible significant adverse impacts have been identified or anticipated and the following mitigation measures are required as a condition of project approval to reduce these impacts to a level below significant. The required mitigation measures are: (List mitigation measures).
4. Significant adverse impacts have been identified or anticipated. An Environmental Impact Report (EIR) is required to evaluate these impacts, which are: (List the impacts requiring analysis within the EIR).

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

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

On the basis of this initial evaluation:

- () I find that the Proposed Project COULD NOT have a significant effect on the environment. 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 standard 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 1) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and 2) 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.

Signature: _____



Date: September 25, 2023

EVALUATION OF ENVIRONMENTAL IMPACTS

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. <i>Would the project:</i>				
a) Have a substantial affect 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?	()	()	(✓)	()

Discussion:

- a/b) **No Impact.** The Project Site is not within a scenic vista/scenic highway view corridor as identified by either the State, San Bernardino County or City. The Proposed Project includes a Tentative Tract Map for future development of 27 single-family homes on a 21.6-acre site. The Project Site does not contain any notable geological features. No historic buildings or State Scenic Highways occur within the vicinity of the Project Site. The Project Site is bounded on the north, east and south by residential development, and vacant land to the west proposed for development (TTM 20404, City of Loma Linda). Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- c) **Less Than Significant Impact.** The Project Site is currently vacant. The Proposed Project will subdivide the property into 27 lots for the future construction of 27 single-family homes. The Project is consistent with the site's Very Low Density Residential land use designation as well as the applicable development standards for the Estate Residential (R-E) District and would be compatible with surrounding land uses (i.e., single-family residential to the north, east and south, and future TTM 20404 to the west). The Proposed Project would not degrade the visual character or quality of the Site or its surroundings as the site is currently vacant, contains no structures or significant vegetation and the development would be consistent with the surrounding development that is currently existing and proposed for the area. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.
- d) **Less Than Significant Impact.** Although the Project Site is vacant, the future development of 27 single-family homes would not generate a significant amount of light and glare when

compared to the surrounding area which includes existing lighting from residential homes and vehicles traveling along San Timoteo Canyon Road. The design and placement of light fixtures within the future development would be reviewed for consistency with City standards and subject to City approval. City Standards require shielding, diffusing, or indirect lighting to avoid glare. Lighting would be selected and located to confine the area of illumination to on-site streets. Since lighting would be consistent with adjacent residential development to the north and east, no significant impacts would result. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Issues and Supporting Information Sources:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
2. AGRICULTURE AND FORESTRY RESOURCES. <i>Would the project:</i>		()	()	()	(✓)
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 in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Gov't Code section 51104(g))?		()	()	()	(✓)
d) Result in the loss of forest land or conservation 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?		()	()	()	(✓)

Discussion:

- a) **No Impact.** The Project Site is identified in the Farmland Mapping and Monitoring Program of the California Resources Agency as "Grazing Land." The Project Site is not identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- b) **No Impact.** As verified with the San Bernardino County Assessor's Office on September 15, 2022, the parcels that make up the Project Site (APN 293-132-01 and 293-141-37) are not enrolled in a Williamson Act contract. Implementation of the Project would not

interfere with such a contract. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

- c) **No Impact.** The Project Site has a land use designation of VLDR by the City of Redlands General Plan and is currently zoned Agricultural. The Project Site does not contain forestland and is within an area that is considered Grazing Land as identified in California Department of Conservation, Conservation Program Support map “San Bernardino County Williamson Act FY 2018 Sheet 2 of 2.” 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 would not be impacted by the Proposed Project as no rezoning from timberland to a non-timberland designation would result. Therefore, no impacts have been identified or anticipated, and no mitigation measures are required.
- d) **No Impact.** No portion of the Project Site occurs within forest land, and the Project would not result in the loss of forest land or convert forest land to a non-forest use. Therefore, no impacts have been identified or anticipated, and no mitigation measures are required.
- e) **No Impact.** The Proposed Project does not involve other changes in the existing environment, which due to its location or nature, would result in conversion of Prime Farmland, to a non-agricultural use. The Project Site is surrounded by existing residential development to the north and west and vacant land and rural residential to the south). Property to the north and east is identified as “urban and built up” and property to the west and south is identified as Grazing Land. Therefore, no impacts have been identified or anticipated, and no mitigation measures are required.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3. AIR QUALITY. <i>Would the project:</i>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	()	()	(✓)	()
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	()	()	(✓)	()
c) Expose sensitive receptors to substantial pollutant concentrations?	()	()	(✓)	()
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	()	()	(✓)	()

Discussion:

- a) **Less than Significant Impact.** The Project Site occurs in the South Coast Air Basin (SCAB). The South Coast Air Quality Management District (SCAQMD) has jurisdiction

over air quality issues and regulations within the SCAB. The Air Quality Management Plan (AQMP) for the SCAB establishes a program of rules and regulations administered by the SCAQMD to obtain attainment of the state and federal ambient air quality standards. The SCAB is classified as an “extreme” nonattainment area for the 2015 Ozone National Ambient Air Quality Standards (NAAQS). The most recent AQMP (AQMP 2022) was developed to address the requirements for meeting this standard and was adopted by the SCAQMD on December 2, 2022. The 2022 AQMP incorporates the latest scientific and technological information and planning assumptions, including transportation control measures developed by the Southern California Association of Governments (SCAG) from the 2020 Regional Transportation Plan/Sustainable Communities Strategy, and updated emission inventory methodologies for various source categories. Consistency with the AQMP 2022 for general development projects is determined by demonstrating compliance with local land use plans and/or employment projections.

A project is inconsistent with the AQMP if: (1) it does not comply with the approved general plan; or (2) it uses a disproportionately large portion of the forecast growth increment (change population or employment levels). According to the City of Redlands General Plan, the Project Site is within the Very Low Density Residential land use designation. The proposed 27 single-family lots (1.3 dwelling units per gross acre), ranging from 20,000 square feet up to 43,719 square feet is an allowable use within the land use designation. Therefore, the emissions associated with the Proposed Project have already been accounted for in the AQMP and approval of the Proposed Project would not conflict with the AQMP or obstruct its implementation. Details of the emissions calculations and the resulting emission levels compared to thresholds are presented below in response b). No significant adverse impacts are identified or anticipated and no mitigation measures are required.

- b) **Less than Significant Impact.** The California Emissions Estimator Model (CalEEMod) recommended by the SCAQMD for all general development projects within the South Coast Air Basin. Therefore, the Proposed Project’s construction and operational emissions were estimated using CalEEMod version 2022.1 (Appendix A). The criteria pollutants estimated for include reactive organic gases (ROG), nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), and fugitive particulates (PM₁₀ and PM_{2.5}). Two of the analyzed pollutants, ROG and NO_x, are ozone precursors. Both summer and winter season emission levels were estimated.

Construction Emissions

Construction emissions are considered short-term, temporary emissions and were modeled with the following construction parameters: demolition, site preparation, site grading (fine and mass grading), building construction, paving, and architectural coating. Construction is anticipated to begin in the spring of 2024 and be completed in 2025. The resulting emissions generated by construction of the Proposed Project are shown in Table 1 and Table 2, which represent summer and winter construction emissions, respectively.

Table 1
Maximum Summer Construction Emissions
(Pounds per Day)

Year	ROG	NO_x	CO	SO₂	PM₁₀	PM_{2.5}
2024	3.7	36.0	34.4	0.1	9.5	4.0
2025	190	10.6	13.9	0.02	0.6	0.4
SCAQMD Threshold	55	55	550	150	150	55
Significance	No	No	No	No	No	No

Source: CalEEMod.2022

Table 2
Maximum Winter Construction Emissions
(Pounds per Day)

Year	ROG	NO_x	CO	SO₂	PM₁₀	PM_{2.5}
2024	2.7	25.0	22.7	0.0	1.1	1.0
2025	1.1	10.6	13.7	0.0	0.6	0.4
SCAQMD Threshold	55	55	550	150	150	55
Significance	No	No	No	No	No	No

Source: CalEEMod.2022

Compliance with SCAQMD Rules 402 and 403

As shown in Table 1 and Table 2, construction emissions during either summer or winter seasonal conditions would not exceed the SCAQMD thresholds. Although the Proposed Project does not exceed SCAQMD thresholds for construction emissions, the Project Proponent would be required to comply with all applicable SCAQMD rules and regulations as the SCAB is in non-attainment status for ozone and suspended particulates (PM₁₀ and PM_{2.5}).

The Project Proponent would be required to comply with Rules 402 nuisance, and 403 fugitive dust, which require the implementation of Best Available Control Measures (BACMs) for each fugitive dust source, and the AQMP, which identifies Best Available Control Technologies (BACTs) for area sources and point sources. The BACMs and BACTs would include, but not be limited to the following:

1. The Project Proponent shall ensure that any portion of the site to be graded shall be pre-watered prior to the onset of grading activities.
 - (a) The Project Proponent shall ensure that watering of the site or other soil stabilization method shall be employed on an on-going basis after the initiation of any grading activity on the site. Portions of the site that are actively being graded shall be watered regularly (3x daily) to ensure that a crust is formed on the ground surface and shall be watered at the end of each workday.
 - (b) The Project Proponent shall ensure that all disturbed areas are treated to prevent erosion until the site is constructed upon.

- (c) The Project Proponent shall ensure that landscaped areas are installed as soon as possible to reduce the potential for wind erosion.
- (d) The Project Proponent shall ensure that all grading activities are suspended during first and second stage ozone episodes or when winds exceed 25 miles per hour.

During construction, exhaust emissions from construction vehicles and equipment and fugitive dust generated by equipment traveling over exposed surfaces, would increase NOX and PM10 levels in the area. Although the Proposed Project does not exceed SCAQMD thresholds during construction, the Applicant/Contractor would be required to implement the following conditions as required by SCAQMD:

- 2. To reduce emissions, all equipment used in grading and construction must be tuned and maintained to the manufacturer's specification to maximize efficient burning of vehicle fuel.
- 3. The Project Proponent shall ensure that existing power sources are utilized where feasible via temporary power poles to avoid on-site power generation during construction.
- 4. The Project Proponent shall ensure that construction personnel are informed of ride sharing and transit opportunities.
- 5. All buildings on the Project Site shall conform to energy use guidelines in Title 24 of the California Administrative Code.
- 6. The operator shall maintain and effectively utilize and schedule on-site equipment in order to minimize exhaust emissions from truck idling.
- 7. The operator shall comply with all existing and future California Air Resources Board (CARB) and SCAQMD regulations related to diesel-fueled trucks, which may include among others: (1) meeting more stringent emission standards; (2) retrofitting existing engines with particulate traps; (3) use of low sulfur fuel; and (4) use of alternative fuels or equipment.

Operational Emissions

The operational mobile emissions were calculated using CalEEMod with the vehicle trip generation estimates from the Vehicle Miles Traveled (VMT) Screening, dated October 16, 2021, prepared for the Proposed Project by Translutions, Inc. The Screening determined that the Proposed Project would generate approximately 255 total daily trips with a trip generation rate of 9.44 trips per dwelling unit per day. Operational emissions are listed in Table 3 and Table 4, which represent summer and winter operational emissions, respectively.

Table 3
Summer Operational Emissions Summary
(Pounds per Day)

Source	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Area	8.4	0.6	15.3	0.0	1.9	1.9
Energy	0.0	0.2	0.1	0.0	0.0	0.0
Mobile	1.1	1.1	10.6	0.0	2.2	0.6
Totals (lbs./day)	9.5	1.9	26.0	0.0	4.1	2.5
SCAQMD Threshold	55	55	550	150	150	55
Significance	No	No	No	No	No	No

Source: CalEEMod.2022

Table 4
Winter Operational Emissions Summary
(Pounds per Day)

Source	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Area	8.3	0.6	13.8	0.0	1.9	1.9
Energy	0.0	0.2	0.1	0.0	0.0	0.0
Mobile	1.0	1.2	8.8	0.0	2.2	0.6
Totals (lbs./day)	9.3	2.0	22.7	0.0	4.1	2.5
SCAQMD Threshold	55	55	550	150	150	55
Significance	No	No	No	No	No	No

Source: CalEEMod.2022

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

- c) **Less than Significant Impact.** For the purposes of a CEQA analysis, the SCAQMD considers a sensitive receptor to be a residence, hospital, convalescent facility or anywhere that it is possible for an individual to remain for 24 hours. Additionally, schools, playgrounds, childcare centers, and athletic facilities can also be considered as sensitive receptors. The use of Local Significance Threshold (LSTs) methodology is voluntary, to be implemented at the discretion of local public agencies acting as a lead agency pursuant to CEQA. According to SCAQMD LST methodology, LSTs would apply if the Proposed Project includes stationary sources or attracts mobile sources (such as heavy-duty trucks) that may spend long periods queuing and idling at the site, such as industrial warehouse/transfer facilities. The Proposed Project is the development of a single-family residential tract. Therefore, no long-term localized significant threshold analysis is warranted. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.
- c) **Less than Significant Impact.** The Proposed Project is a planned residential development and does not contain land uses typically associated with the emission of objectionable odors. Potential temporary odor sources associated with the Proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities. The Proposed Project would be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances.

SCAQMD Rule 402 regarding nuisances states: “A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.” During operations, project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City of Redlands’s solid waste regulations. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
4. BIOLOGICAL RESOURCES. <i>Would the project:</i> 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 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?	()	()	()	(✓)
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	()	()	()	(✓)
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 logical 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?	()	()	()	(✓)

Discussion:

- a) **Less Than Significant Impact with Mitigation.** A Biological Resources Assessment (BRA) was prepared for the Project by Michael Baker International. A copy of the report is provided in Appendix B of this Initial Study and is summarized herein.

A literature review and a field survey were conducted to confirm existing site conditions and assess the potential for special-status plant and wildlife species to occur on or within the immediate vicinity of the Project Site. A habitat assessment/field survey was conducted on March 31, 2021, to confirm existing site conditions. Vegetation communities occurring within the Project Site were mapped on an aerial photograph and classified in accordance with the vegetation descriptions provided in *A Manual of California Vegetation* (Sawyer et al. 2009) and cross referenced with the *Preliminary Descriptions of the Terrestrial Natural Communities of California* (Holland 1986) for the purposes of evaluating the presence or absence of special-status vegetation communities identified in the CNDDDB records search.

The Project Site is primarily composed of undeveloped, disturbed habitat which consists of heavily disturbed/compacted soils. Historic aerial imagery from 1994 through 2020 (Google, Inc. 2021) shows that citrus groves encompassed the Project Site from 1994 to 2005. Further, routine weed abatement activities (i.e., disking, tilling) throughout the Project Site have eliminated any natural vegetation communities. Mixed-use areas including residential land uses to the north, east and south, and vacant, disturbed land formerly used as a palm farm were observed west of the Project Site.

A total of 77 special-status wildlife species are recorded in the USGS *Redlands, Riverside East, San Bernardino South, and Sunnymead, California* 7.5-minute quadrangles. Based on the results of the field survey and a review of specific habitat preferences, occurrence records, known distributions, and elevation ranges, the BRA concluded that the Project Site has a high potential to support sharp-shinned hawk (*Accipiter striatus*; a State WL species), burrowing owl (*Athene cunicularia* [BUOW]; a State Species of Special Concern [SSC]), California horned lark (*Eremophila alpestris actia*; a State WL species), loggerhead shrike (*Lanius ludovicianus*; a State SSC), and San Diego black-tailed jackrabbit (*Lepus californicus bennettii*; a State SSC); and a moderate potential to support Vaux's swift (*Chaetura vauxi*; a State SSC). All remaining special-status wildlife species either have a low potential or are not expected to occur within the Project Site.

A single Cooper's hawk was observed carrying nesting material to a large ornamental tree in a residential yard located west of San Timoteo Canyon Road, outside the Project Site limits, and is expected to be present year-round utilizing the Project Site for foraging opportunities. In addition, a single Swainson's hawk was observed roosting in a Peruvian pepper tree (*Schinus molle*) located to the southwest of the Bermudez Street/New Jersey Street intersection and was later observed foraging over the vacant parcel located to the west of the Project Site. This species is not expected to nest within the Project Site, which is out of the typical nesting range of this species; however, the Project Site potentially provides foraging habitat during migration for this species (typically March to May and September to October).

No Burrowing Owls (BUOWs) or signs (i.e., pellets, whitewash, feathers, or prey remains) were observed during the field survey. Disturbed habitat within the Project Site

provides suitable foraging habitat and line of site opportunities for BUOW. In addition, the Project Site contains suitable burrows (> 4 inches in diameter) capable of providing roosting and nesting opportunities for BUOW. Based on occurrence records, the Project Site is located within an area that is or was previously known to be occupied by BUOW and likely provides suitable nesting and foraging habitat. As such, the BRA concluded that the BUOW has a high potential to occur within the Project Site.

To avoid and/or minimize potential impacts to biological resources, the following mitigation measure shall be implemented:

BIO-1: Prior to issuance of grading permits, a qualified biologist shall prepare a **Workers Environmental Awareness Program (WEAP)** and include a brief review of any special-status species (e.g., Cooper's hawk, sharp-shinned hawk, burrowing owl, Swainson's hawk, California horned lark, loggerhead shrike, San Diego black-tailed jackrabbit), including habitat requirements and where they might be found, and other sensitive biological resources that could occur in and adjacent to the Project Site. The WEAP shall also include a summary of the biological mitigation measures, as well as installation of perimeter sediment and erosion control best management practices.

BIO-2: If project-related activities are to be initiated during the nesting season (January 1 to August 31), a pre-construction nesting bird clearance survey shall be conducted by a qualified biologist no more than three (3) days prior to the start of any vegetation removal or ground disturbing activities. The qualified biologist shall survey all suitable nesting habitat within the project impact area, and areas within a biologically defensible buffer zone surrounding the project impact area. If no active bird nests are detected during the clearance survey, project activities may begin, and no additional avoidance and minimization measures shall be required. If an active bird nest is found, the species shall be identified, and a "no-disturbance" buffer shall be established around the active nest. The size of the "no-disturbance" buffer shall be increased or decreased based on the judgement of the qualified biologist and level of activity and sensitivity of the species. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, project activities within the "no-disturbance" buffer may occur following an additional survey by the qualified biologist to search for any new bird nests in the restricted area.

BIO-3: Due to the presence of suitable habitat, focused burrowing owl surveys shall be conducted by a qualified biologist prior to the initiation of project activities. In accordance with the *Staff Report on Burrowing Owl Mitigation* (CDFW, 2012), four (4) separate surveys shall be conducted during the breeding season (February 1 through August 31). The surveys shall be conducted three weeks apart between April 15 and July 15, with at least one survey occurring between February 15 and April 15 and one survey after June 15. The focused surveys shall cover all suitable habitat within the project impact area, including areas containing suitable habitat within a 500-foot buffer (as accessible). Following completion of the focused surveys, the qualified biologist shall prepare a final report documenting the

methods and results of the survey and submit to the City of Redlands prior to initiating project activities.

BIO-4: Two pre-construction clearance surveys shall be conducted 14 to 30 days and 24 hours prior to any vegetation removal or ground disturbing activities to confirm the presence/absence of burrowing owls and ensure impacts to occupied burrows do not occur. The clearance surveys shall be conducted by a qualified biologist in accordance with the methods and guidelines presented in the *Staff Report on Burrowing Owl Mitigation* (CDFW, 2012) and cover all suitable habitat within the project impact area, including areas containing suitable habitat within a 500-foot buffer (as accessible). Following completion of the final clearance survey, the qualified biologist shall prepare a final report documenting the methods and results of the survey and submit to the City of Redlands prior to initiating project activities.

BIO-5: If an occupied burrow is found within the project impact area during pre-construction clearance surveys, a burrowing owl exclusion plan shall be prepared and submitted to the CDFW for approval prior to initiating project activities that includes proposed mitigation for direct and permanent impacts to nesting, occupied and satellite burrows and/or suitable habitat such that the habitat acreage, number of burrows and burrowing owls impacted are replaced in accordance with the *Staff Report on Burrowing Owl Mitigation* (California Department of Fish and Game 2012). If an occupied burrow is found within adjacent habitat that may be indirectly impacted by project activities, a “no disturbance” buffer shall be established around the burrow following the distances recommended in the *Staff Report on Burrowing Owl Mitigation* (CDFW, 2012). The qualified biologist shall continue to monitor the burrow, adjust the “no disturbance” buffer area (as needed), and shall have the authority to stop construction activities to prevent take.

Mammals

The Project Site provides marginal habitat for a limited number of mammalian species adapted to living in urban environments. Coyote (*Canis latrans*) and desert cottontail (*Sylvilagus audubonii*) were the only mammals observed during the field survey. Common mammalian species that may occur within the Project Site include domestic dog (*Canis lupus familiaris*), opossum (*Didelphis virginiana*), raccoon (*Procyon lotor*), and California ground squirrel (*Otospermophilus beecheyi*). In addition, bats occur throughout most of southern California and may use the Project Site and surrounding area for foraging and roosting (e.g., within hollow tree trunks/limbs, underneath tree foliage). Common bat species that may occur within the Project Site include Mexican free-tailed bat (*Tadarida brasiliensis*) and big brown bat (*Eptesicus fuscus*). Roosting habitat is limited since most of the Project Site is disturbed; however, the few date and Mexican fan palm trees located within the Project Site could still provide roosting habitat for bat species that typically roost in hollow tree trunks/limbs or underneath foliage. Bat species that prefer to roost in mines, caves, rock outcrops, deep rock crevices, and old buildings would not be expected to occur as these features are absent from the Project Site. To ensure potential impacts to bats are reduced to a less than significant level, the following mitigation measures shall be made conditions of project approval:

BIO-6: No more than 30 days prior to construction, a qualified bat biologist shall perform a clearance survey within all suitable structures and vegetation within the project impact area. If bat roosts are found within the project impact area, the qualified bat biologist shall identify the bats to the species level and evaluate the colony to determine its size and significance. If any structures house an active maternity colony of bats, construction activities shall not occur during the recognized bat breeding season (March 1 to October 1). Any proposed work in areas with no suitable roosting or foraging habitat shall not require a bat survey. If a bat roost is present within the vicinity of a proposed project impact area that does not need to be removed, a qualified bat biologist shall establish a species-specific “no-disturbance” buffer that must be maintained throughout the duration of the project. If a maternity roost is identified, a “no-disturbance” buffer shall be established and maintained until a qualified bat biologist determines that the roost is no longer active.

BIO-7: If bat roosts are found and project activities must occur during non-daylight hours or during the bat breeding season (March 1 to October 1), a qualified bat biologist shall establish monitoring measures, including frequency and duration, based on species, individual behavior, and type of construction activities. Night lighting shall be used only within the portion of the project actively being worked on and focused directly on the work area. This measure would minimize visual disturbance and allow bats to continue to utilize the remainder of the area for foraging and night roosting. If bats are showing signs of distress, project activities shall be modified to prevent bats from abandoning their roost or altering their feeding behavior. At any time, the qualified biologist shall have the authority to halt work if there are any signs of distress or disturbance that may lead to roost abandonment. Work shall not resume until corrective measures have been taken or it is determined that continued activity would not adversely affect roost success. Any roosting habitat loss shall be sequenced, and roosting habitat shall be restored or replaced in-kind and on-site to prevent temporal or permanent loss based on the bat species roosting requirements.

- b) **No Impact.** Natural habitats within the Project Site have been eliminated due to past agricultural operations as well as routine weed abatement activities (i.e., disking, tilling), resulting in heavily disturbed and compacted surface soils throughout. As such, native vegetation communities do not occur. Vegetation that is present primarily consists of ruderal/weedy plant species including pigweed amaranth (*Amaranthus albus*), wild oats (*Avena fatua*), coastal heron's bill (*Erodium cicutarium*), short podded mustard (*Hirschfeldia incana*), bicolored lupine (*Lupinus bicolor*), Russian thistle (*Salsola tragus*), and common Mediterranean grass (*Schismus barbatus*). Scattered ornamental/non-native trees were also observed including orange tree (*Citrus sinensis*), tangerine (*Citrus tangerina*), tree tobacco (*Nicotiana glauca*), blue paloverde (*Parkinsonia florida*), date palm (*Phoenix* sp.), and Mexican fan palm (*Washingtonia robusta*).

Six special-status vegetation communities have been reported in the USGS Redlands, Riverside East, San Bernardino South, and Sunnymead, California 7.5-minute quadrangles by the CNDDB and include: Riversidian Alluvial Fan Sage Scrub, Southern

Coast Live Oak Riparian Forest, Southern Cottonwood Willow Riparian Forest, Southern Riparian Scrub, Southern Sycamore Alder Riparian Woodland, and Valley Needlegrass Grassland. None of the special-status vegetation communities identified by the CNDDB were observed within the Project Site during the field survey. No impacts to any special status plant species would result.

- c) **No Impact.** There are three agencies that regulate activities within inland streams, wetlands, and riparian areas in California. The U.S. Army Corps of Engineers (USACE) Regulatory Branch regulates discharge of dredged or fill material into “waters of the U.S.” pursuant to Section 404 of the federal Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act. Of the State agencies, the Regional Water Quality Control Board (RWQCB) regulates discharges to surface waters pursuant to Section 401 of the CWA and Section 13263 of the California Porter-Cologne Water Quality Control Act, and the CDFW regulates alterations to streambed and associated vegetation communities under Section 1600 *et seq.* of the CFGC.

No jurisdictional drainage or potential wetland features were observed within the boundaries of the Project Site. Therefore, the Proposed Project would not result in impacts to USACE, RWQCB, or CDFW jurisdictional areas and regulatory approvals would not be required.

- d) **Less Than Significant Impact with Mitigation Incorporated.** Wildlife corridors and linkages are key features for wildlife movement between habitat patches. Wildlife corridors are generally defined as those areas that provide opportunities for individuals or local populations to conduct seasonal migrations, permanent dispersals, or daily commutes, while linkages generally refer to broader areas that provide movement opportunities for multiple keystone/focal species or allow for propagation of ecological processes (e.g., for movement of pollinators), often between areas of conserved land.

The Project Site is not located within any wildlife corridors, areas of critical environmental concern, wilderness areas, wilderness study areas, habitat conservation plans, natural community conservation plans, reserves, or preserves. Adjacent residential land uses and existing roadways have fragmented the connection between the Project Site and surrounding naturally occurring vegetation communities. The disturbed and developed landscape of the Project Site and absence of native vegetation for cover most likely precludes the movement of wildlife through the Project Site. In addition, wildlife movement has likely been reduced by the presence of surrounding high-traffic roadways (i.e., San Timoteo Canyon Road, Nevada Street, Barton Road, Beaumont Avenue). Further, elevated noise levels, vehicle traffic, lighting, and human presence associated with the surrounding residential developments and roadways has decreased the suitability of the Project Site as a wildlife movement corridor.

Nesting birds are protected pursuant to the federal Migratory Bird Treaty Act (MBTA) of 1918 and the California Fish and Game Code (CFGC). To maintain compliance with the MBTA and CFGC, clearance surveys are typically required prior to any ground disturbance or vegetation removal activities to avoid direct or indirect impacts to active bird nests and/or nesting birds. Consequently, if an active bird nest is destroyed or if project activities result in indirect impacts (e.g., nest abandonment, loss of reproductive effort) to nesting birds, it is considered “take” and is potentially punishable by fines and/or imprisonment. Due to the routine weed abatement activities and general lack of mature vegetation, the project site provides limited nesting habitat for most year-round

and seasonal avian residents other than those that nest on the open ground (e.g., killdeer [*Charadrius vociferus*]). However, there is intact Riversidean sage scrub habitat outside of and immediately to the east of the Project Site that still provides adequate nesting habitat for species that nest in shrubs. Therefore, possible significant adverse impacts have been identified or anticipated and the following mitigation measure is required as a condition of project approval:

BIO-8: Trimming, grubbing, and clearing of vegetation shall be avoided during the general avian breeding season (January 15 to July 15 for raptors; February 15 to August 31 for other avian species) to the extent feasible. If trimming, grubbing, or clearing of vegetation is proposed to occur during the general avian breeding season, a pre-construction survey shall be conducted by a qualified biologist no more than seven days prior to vegetation clearing to determine if active bird nests are present in the affected areas. If there are no nesting birds (includes nest building or other breeding/nesting behavior) within this area, trimming, grubbing, and clearing of vegetation shall be allowed to proceed. If active bird nests are confirmed to be present during the pre-construction survey, a buffer zone will be established by the biologist. Construction activities shall avoid any active nests until a qualified biologist has verified that the young have fledged, or the nest has otherwise become inactive.

- e) **No Impact.** Natural habitats within the Project Site have been eliminated due to past agricultural operations as well as routine weed abatement activities (i.e., disking, tilling), resulting in heavily disturbed and compacted surface soils throughout. As such, native vegetation communities do not occur, and the Project Site is instead primarily composed of disturbed habitat that is dominated by ruderal/weedy, low-growing plant species. Therefore, implementation of the Proposed Project would not conflict with any local policies or ordinances such as a tree preservation policy. No impacts have been identified or anticipated and no mitigation measures are warranted.
- f) **No Impact.** The Project Site is not located within the boundaries of any adopted conservation plan. Therefore, no impact to any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan would occur. No impacts are identified or anticipated, and no mitigation measures are required.

Issues and Supporting Information Sources:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
5. CULTURAL RESOURCES. <i>Would the project:</i>					
a)	Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?	()	()	(✓)	()
b)	Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5?	()	(✓)	()	()

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Disturb any human remains, including those interred outside of formal cemeteries?	()	(✓)	()	()

Discussion:

- a) **Less Than Significant Impact.** In March 2022, a Cultural Resources Assessment was prepared for the Proposed Project by BCR Consulting LLC. A copy of the report is provided in Appendix C of this Initial Study and is summarized herein.

A historical resource consists of any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Generally, a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing in the California Register of Historical Resources" (Cal. Code Regs. tit. 14(3), § 15064.5(a)(3). The significance of a historical resource is impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for the California Register. If an impact on a historical resource is significant, CEQA requires feasible measures to minimize the impact (State CEQA Guidelines § 15126.4 (a)(1)). Mitigation of significant impacts must lessen or eliminate the physical impact that the project will have on the resource.

The eligibility criteria for the California Register are similar to those of the National Register of Historic Places (National Register), and a resource that meets one of more of the eligibility criteria of the National Register will be eligible for the California Register. The California Register program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance, identifies historical resources for state and local planning purposes, determines eligibility for state historic preservation grant funding and affords certain protections under CEQA. Criteria for Designation includes the following:

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or 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.
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 to meeting one or more of the above criteria, the California Register requires that sufficient time has passed since a resource's period of significance to "obtain a

scholarly perspective on the events or individuals associated with the resources.” (CCR 4852 [d][2]). Fifty years is normally considered sufficient time for a potential historical resource, and in order that the evaluation remain valid for a minimum of five years after the date of this report, all resources older than 45 years (i.e. resources from the historic-period) will be evaluated for California Register listing eligibility, or CEQA significance. The California Register also requires that a resource possess integrity. This is defined as the ability for the resource to convey its significance through seven aspects: location, setting, design, materials, workmanship, feeling, and association.

The City of Redlands has its own set of criteria for historic eligibility. Although it is based on the National Register and California Register criteria, it is slightly more detailed and expansive, with 11 eligibility criteria listed in Chapter 2.62, Article II of the Redlands Municipal Code.

Records search results were obtained by request from the South-Central Coastal Information Center (SCCIC). The records search included a review of all recorded historic and prehistoric cultural resources, as well as a review of known cultural resources, and survey and excavation reports generated from projects completed within one half-mile of the Project Site. In addition, a review was conducted of the National Register of Historic Places (National Register), the California Register of Historical Resources (California Register), and documents and inventories from the California Office of Historic Preservation including the lists of California Historical Landmarks, California Points of Historical Interest, Listing of National Register Properties, and the Inventory of Historic Structures.

The original owner of the Project Site was Benjamin P. Davis, who received the land patent of 40 acres (including the Project Site) as part of a cash purchase from the U.S. government in 1887. The property was water-leveled and planted with a citrus grove prior to 1938. The earliest known owner after Davis was Ernest Larsen, a Redlands businessman and philanthropist who owned and operated various construction and agricultural businesses from the 1920s until the 1980s. He was born in Copenhagen, Denmark in 1900, arrived in the U.S. in 1904, and lived in Fresno from 1910 until moving to Redlands to attend the University of Redlands in 1919. He graduated in 1923 with a degree in chemistry. He married Dorothy Bridges of Tennessee in 1924, and they raised two daughters in Redlands. The Larsens remained in Redlands the rest of their lives. Ernest died in 1990 and Dorothy died in 1993. The property was cleared of all vegetation by 1959, likely during the Larsen ownership. Between 1959 and 1966, the grove was replanted with citrus and modernized to include three frost fans and a pressurized water tank. Aerial photos show a pump house and two steel tanks situated near the other water conveyance infrastructure at the highest elevation along the easternmost boundary in 1938. The pump house was gone by 1967, likely a casualty of modernization.

During the field survey, BCR Consulting archaeologists identified infrastructure associated with a former historic citrus grove, temporarily designated MBI2006-H-1. CEQA calls for the evaluation and recordation of historic and archaeological resources. The criteria for determining the significance of impacts to cultural resources are based on Section 15064.5 of the *CEQA Guidelines* and Guidelines for the Nomination of Properties to the California Register. Properties eligible for listing in the California Register and subject to review under CEQA are those meeting the criteria for listing in the California Register, or designation under a local ordinance.

California Register Evaluation of MBI2006-H-1

Criterion 1: The citrus grove was originally developed during the early 20th century, although the only elements that remain from that era are the two riveted steel water tanks. The other elements were installed after 1959 when the grove was removed and replanted. The property was utilized within the general context of agricultural (specifically citrus) development of Redlands. However, it is not significantly associated with important events related to the founding of the industry or with development of the region. It is therefore not eligible for the California Register under Criterion 1.

Criterion 2: The Larsen family, who were locally well known for business development in the citrus industry, and philanthropic pursuits, owned the property. However, research has not linked any physical features of the property to convey an important relationship with the Larsens. It is therefore not eligible under Criterion 2.

Criterion 3: The elements represent common, and deteriorating, portions of a citrus grove that no longer functions. Most of the irrigation system and all trees have been removed. Therefore, the property does not embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of an important creative individual or possess high artistic values. As such, the property is not eligible under Criterion 3.

Criterion 4: This resource has been subject to repeated disturbance related to planting and removing a citrus grove and its infrastructure. This activity has removed most of the elements associated with the former grove. As such it has not and is not likely to yield information important in prehistory or history, and therefore is not eligible under Criterion 4.

As concluded in the Cultural Resources Assessment, MBI2006-H-1 is not eligible under any of the four criteria for listing on the California Register and is not considered an historical resource under CEQA. In addition, it is not locally eligible under Chapter 2.62, Article II of the Redlands Municipal Code. Based on these results, the report concluded that no CEQA-significant resources exist within the Project Site and that Project-related adverse effects to historical resources under CEQA are not likely. No significant adverse impacts have been identified or are anticipated and no mitigation measures are warranted.

- b) **Less Than Significant Impact with Mitigation Incorporated.** Although no significant cultural resources were identified within the Project Site, it lies between the San Timoteo Wash, a travel corridor used widely by Native Americans and subsequently by the Spanish, and the San Bernardino Asistencia, a mission outpost that was heavily reliant on Native American labor to construct other local resources such as the Mill Creek Zanja. Due to intense use of the area during the prehistoric and Spanish eras, the Project Site is considered sensitive for buried resources. Therefore, the following mitigation measure shall be implemented to ensure potential impacts to archeological resources are reduced to a less than significant impact:

CR-1: Prior to commencement of any project-related ground disturbance, a Cultural Resources Professional that meets the U.S. Secretary of the Interior Professional Qualification Standards for archaeology (the Project

Archaeologist) shall attend a pre-grade meeting with the applicant, contractors, and any participating Native American entities to address potential to encounter cultural resources. The meeting will establish: Roles, Responsibility and Authority of Archaeological Monitors (and Native American Monitors, as Necessary), Safety Considerations, Communication Protocols, Appropriate Respect Regarding Native American Participation and Discovery of Human Remains, Consequences of unauthorized activities.

- CR-2:** An archaeological monitor shall be present during all earth moving activities associated with the Project. The archaeological monitor will work under the supervision of the Project Archaeologist. If previously unidentified potentially significant cultural resources are discovered, the Archaeological Monitor would have the authority to divert or temporarily halt ground disturbance in the area of discovery to allow evaluation of potentially significant cultural resources. The Project Archaeologist would determine significance of any discoveries in consultation with any Native American Monitor(s), the developer, and the City. Any artifacts discovered shall be recovered and features recorded using professional archaeological methods before construction activities are allowed to resume in the affected area. Isolated artifacts and clearly non-significant deposits would be minimally documented in the field and would represent minimal or no constraint to construction excavation. Ownership of any artifacts identified during ground disturbing activities (including any necessary archaeological excavation) would be relinquished by the landowner. Upon completion of archaeological monitoring, the Project Archaeologist shall submit an Archaeological Monitoring Report to the City. The report shall document the type and disposition of resources recovered, and document cultural sensitivity training. The report shall document the type of monitoring activities conducted, report any problems or issues, and summarize findings.
- CR-3** 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 a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed within TCR-1, regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.
- CR-4:** If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to SMBMI for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.

- c) **Less Than Significant Impact with Mitigation Incorporated.** Construction activities, particularly grading, could adversely affect or eliminate unknown human remains. Possible significant adverse impacts have been identified or anticipated and the following mitigation measures are required as a condition of project approval to reduce these impacts to a level below significant. The required mitigation is:

CR-5: If human remains of any kind are found during earthwork activities, all activities shall cease immediately, the Redlands Police Department and the San Bernardino County Coroner and a qualified archaeologist shall be notified. The Coroner shall examine the remains and determine the next appropriate action based on the findings. If the Coroner determines the remains to be of Native American origin, they shall notify the Native American Heritage Commission. The Native American Heritage Commission shall then identify the most likely descendants to be consulted regarding treatment and/or reburial of the remains. If a most likely descendant cannot be identified, or the most likely descendant fails to make a recommendation regarding the treatment of the remains within 48 hours after gaining access to them, the contractor shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance.

CR-6: 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.

Implementation of the above mitigation measure would ensure potential impacts to unknown human remains are reduced to a less than significant level.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
6. ENERGY. <i>Would the project:</i>	()	()	(✓)	()
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation?				
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	()	()	(✓)	()

- a) **Less Than Significant Impact.**

Electricity

Southern California Edison (SCE) provides electricity to the area of Project Site. Currently, the existing Project Site is vacant and undeveloped. Therefore, development

of the Proposed Project would cause a permanent increase in demand for electricity when compared to existing conditions. The CalEEMod model projected that the Proposed Project would consume 0.358094 GWh annually. According to the California Energy Commission, the residential sector of the Southern California Edison planning area consumed 36,375.76 GWh of electricity in 2021.¹ The increase in electricity demand from the Project would represent approximately 0.00098 percent of the overall 2021 SCE residential consumption. Therefore, projected electrical demand would not significantly impact SCE's level of service.

Natural Gas

The Project Site is located within the service area of Southern California Gas (SoCal Gas). The Project Site is currently vacant and has no demand for natural gas. The Proposed Project will create a permanent increase in demand for natural gas. The CalEEMod model projected that the Proposed Project would consume 8,448.22 therms of natural gas annually. According to the California Energy Commission, the natural gas consumption of the SoCal Gas's residential sector was 230,834,884 therms in 2021.² The Proposed Project's estimated annual natural gas consumption compared to the 2021 annual natural gas consumption of the overall residential sector in the SoCal Gas Planning Area would account for approximately 0.000365 percent of total natural gas consumption. Therefore, projected natural gas demand would not significantly impact SoCal Gas's level of service.

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

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

¹California Energy Commission. <https://ecdms.energy.ca.gov/Default.aspx>. Accessed August 30, 2023

²California Energy Commission. <https://ecdms.energy.ca.gov/Default.aspx>. Accessed August 30, 2023

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
7. GEOLOGY AND SOILS. <i>Would the project:</i>				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	()	()	(✓)	()
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 risks to life or property?	()	()	(✓)	()
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	()	()	(✓)	()
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	()	(✓)	()	()

Discussion:

a,c) **Less Than Significant Impact.** In April 2021, a Design-Level Geotechnical Evaluation was prepared for the Project Site by Leighton and Associates, Inc.; a copy of the report is included as Appendix D to this Initial Study, and is summarized herein.

i) According to the Geotechnical Evaluation and the City of Redlands General Plan Figure 8.3 Geotechnical Hazards, the Project Site does not occur within an Alquist-Priolo Earthquake Fault Zone or special study zone. The nearest fault is the San Jacinto Valley Fault located about 4.1 miles east of the Project Site. The San Jacinto

Valley Fault is a right-lateral strike-slip fault zone that runs through San Bernardino, San Diego and Imperial counties in southern California. The last major earthquake on the San Jacinto occurred on April 9, 1968 and was a 6.5 M_w on the Coyote Creek segment. An earthquake occurring on the San Jacinto Fault could be as large as a magnitude 7.5 M_w . The potential occurrence of ground rupture at the Project Site is considered low, since no fault traverses the site. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

- ii) The Project Site is situated in an area of active and potentially active faults, as is most of southern California. Active faults present a variety of potential risks to structures, the most common of which are strong ground shaking, dynamic densification, liquefaction, mass wasting, and surface rupture at the fault plane. Generally, the following four factors are the principal determinants of seismic risk at a given location including: 1) distance to capable faults; 2) the maximum magnitude earthquake for a capable fault; 3) seismic recurrence interval, in turn related to tectonic slip rates; and 4) nature of earth materials underlying the site.

The San Jacinto fault zone (San Jacinto Valley Segment) is a system of northwest-trending, right-lateral, strike-slip faults, and is the closest known active fault to the Project Site (occurring approximately 4.1 miles east of the Project Site) and is considered the most important fault to the Project Site with respect to the hazard of seismic shaking and ground rupture. More large historic earthquakes have occurred on the San Jacinto fault than any other fault in southern California. Severe seismic shaking can be expected during the lifetime of the Proposed Project. Construction of residential units in accordance with applicable requirements of the Uniform Building Code would ensure that potential impacts are reduced to the maximum extent possible. Therefore, no significant adverse impact is identified or anticipated, and no mitigation measures are required.

- iii) Liquefaction occurs primarily in saturated, loose, fine to medium grained soils in areas where the groundwater table is within 50 feet of the surface. As concluded in the Geotechnical report prepared for the Project, per San Bernardino County Land Use Plan, General Plan, Geologic Hazard Overlays, Sheet FH31 C, the Project Site does not occur within an area known for liquefaction, lateral spreading potential or landslide susceptibility. In addition, liquefaction potential at the Project Site is very low due to an estimated depth to groundwater of 50 feet or greater beneath the existing ground surface.

Seismically induced subsidence is the result of loose sand soils subject to moderate to strong ground shaking. Based on the results of the Geotechnical report, the Project Site is underlain by dense to very dense or hard, consolidated deposits that are not anticipated to be prone to significant seismic settlement. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

- iv) According to the Geotechnical report prepared for the Project, the potential for occurrence of landslides is considered low as the Project Site is relatively flat with a gentle slope of approximately four percent toward the north. Landslides due to seismic shaking would not occur. Therefore, no significant adverse impacts have been identified or anticipated, and no mitigation measures are required.

- b) **Less Than Significant Impact.** As discussed in the Geotechnical Investigation, the San Bernardino County Geologic Hazard Overlay Map EHFH C indicates the Project Site has a low liquefaction susceptibility. The most recent available groundwater data pertinent to the site is from 1979, indicating a depth of around 100 feet. As concluded in the Geotechnical Investigation, based on the absence of shallow groundwater, the subsurface soils are not considered susceptible to liquefaction. Therefore, no significant adverse impacts have been identified or anticipated, and no mitigation measures are required.
- d) **Less Than Significant Impact.** Expansive soils contain significant amounts of clay particles that swell considerably when wetted and shrink when dried. Foundations constructed on these soils are subjected to large uplifting forces caused by the swelling. Without proper measures taken, heaving and cracking of building foundations and slabs-on-grade could result. Expansion index testing was performed as part of the Geotechnical Investigation on a representative sample obtained from near surface fine-grained soils. Laboratory tests resulted in an expansion index of one (1). Based on the exploratory borings, field observations, and laboratory testing, the encountered near-surface clayey soils are expected to have a “very low” expansion potential. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- e) **Less Than Significant Impact.** The nearest City sewer is located at the intersection of Nevada Street and Barton Road; approximately 2,100 feet north of the Project Site. In accordance with City of Redlands Municipal Code 13.44.080: When Sewer Not Available, several alternatives to provide sewer service to the Project site were analyzed. As demonstrated in the February 2021 Canyon Ranch – City of Redlands Sewer Alternatives Memorandum (see Appendix E), septic systems for each of the individual lots was determined to be the most feasible alternative. Per approval from the State Water Resources Control Board and concurrence from the City of Redlands, septic sewer is a viable alternative provided that the average lot size is at least on-half acre. The current Site Plan meets this minimum requirement, therefore septic tanks can be installed for each individual residential lot and no significant impacts would result. Therefore, no adverse significant impacts are identified or anticipated, and no mitigation measures are required.
- f) **Less Than Significant with Mitigation.** As concluded in the Geotechnical report, excavation activity associated with development of the site has the potential to impact the paleontologically sensitive Quaternary alluvial units. Therefore, significant adverse impacts have been identified or anticipated and the following mitigation measure shall be implemented:

GEO-1: Prior to issuance of grading permits, the applicant shall retain a qualified paleontologist to create and implement a Paleontological Resource Mitigation Program (PRIMP). The project paleontologist shall review the grading plan and conduct any pre-construction work necessary to render appropriate monitoring and mitigation requirements, to be documented in the PRIMP. The PRIMP shall be submitted to the City prior to issuance of a grading permit.

GEO-2: In the event paleontological resources are uncovered during grading, the Project Proponent shall notify the City Planning Division of the discovery and contact a qualified vertebrate paleontologist to perform a field survey to determine and record any non-renewable paleontological resources found on-site. The paleontologist shall determine the significance and make recommendations to the City of Redlands for appropriate mitigation measures in compliance with the guidelines of the California Environmental Quality Act.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
8. GREENHOUSE GAS EMISSIONS. <i>Would the project:</i>	()	()	(✓)	()
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	()	()	(✓)	()
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	()	()	(✓)	()

- a) **Less than Significant Impact.** Emissions were estimated using CalEEMod version 2022.0 with construction anticipated to begin in spring of 2024 and be completed towards the end of 2025. The CalEEMod defaults were used for other parameters which are used to estimate construction emissions, such as the worker and vendor trips and trip lengths. The operational mobile emissions were calculated using CalEEMod with the vehicle trip generation estimates from the Vehicle Miles Traveled Screening prepared by Translutions, Inc, dated October 16, 2021. The Proposed Project is anticipated to generate approximately 225 vehicle trips that would be produced by passenger cars.

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

Table 5
Greenhouse Gas Construction Emissions
(Metric Tons per Year)

Source/Phase	CO ₂	CH ₄	N ₂ O
2024	334	0.0	0.0
2025	191	0.0	0.0
Total MTCO₂e	525		
Construction Amortized 30 Years	17.5		
SCAQMD Threshold	3,000		
Significant	No		

Source: CalEEMod.2022

Table 6
Greenhouse Gas Operational Emissions
(Metric Tons per Year)

Source/Phase	CO ₂	CH ₄	N ₂ O
Area	8.8	0.0	0.0
Energy	101	0.0	0.0
Mobile	406	0.0	0.0
Water	3.0	0.0	0.0
Waste	2.3	0.2	0.0
MTCO₂e	522.02		
SCAQMD Threshold	3,000		
Significant	No		

Source: CalEEMod.2022

As shown in Table 5 and Table 6, the Proposed Project's emissions would not exceed SCAQMD's draft screening threshold and the CAP's threshold of significance. Less than significant impacts are identified or anticipated, and no mitigation measures are required.

- b) **Less than Significant Impact.** The SCAQMD's thresholds used the California Governor Executive Order S-3-05 goals as the basis for deriving the screening level. The Proposed Project's emissions meet the threshold for compliance with Executive Order S-3-05, the Proposed Project's emissions also comply with the goals of AB 32. Additionally, as the Proposed Project meets the current interim emissions targets/thresholds established by the SCAQMD (as described in Section III Air Quality of this Initial Study), the Proposed Project would also be on track to meet the reduction target of 40 percent below 1990 levels by 2030 as mandated by SB 32. Furthermore, all post-2020 reductions in GHG emissions are addressed via regulatory requirements at the State level and the Proposed Project would be required to comply with these regulations as they come into effect. As discussed, the Proposed Project's GHG emissions fall below the Tier 3 SCAQMD draft screening threshold of 3,000 metric tons of CO₂ equivalent per year and the Proposed Project would follow the reduction goals AB 32 and SB 32.

The CAP quantifies existing and projected GHG emissions in the General Plan Planning Area through horizon year 2035 resulting from activities within the Planning Area and the region, and it includes GHG emissions reduction targets for the year 2035. To reflect

SB 32 target, CARB's 2017 Climate Change Scoping Plan Update recommends that local governments target 6 MTCO₂e per capita for 2030 emissions and 2 MTCO₂e per capita for 2050 emissions. The Proposed Project's emissions would not exceed the CAP's threshold of 6 MTCO₂e per capita per year. Therefore, construction and operation of the Proposed Project will not conflict with any applicable plan, local or regional greenhouse gas plans. No significant impacts are identified or anticipated, and no mitigation measures are required.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
9. HAZARDS AND HAZARDOUS MATERIALS. <i>Would the project:</i>	()	()	(✓)	()
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 considerations involving the release of hazardous materials into the environment?	()	()	(✓)	()
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 1/4 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?	()	()	()	(✓)

Discussion:

- a,b) **Less Than Significant Impact.** The Proposed Project is the subdivision of the Project Site into 27 residential lots and five lettered lots. Construction of the Proposed Project would require the routine transport, use, storage, and disposal of limited quantities of common hazardous materials such as gasoline, diesel fuel, oils, solvents, paint, fertilizers, pesticides, and other similar materials. All materials required during construction would be kept in compliance with State and local regulations and Best Management Practices. Operations would include standard maintenance (i.e., landscape upkeep, exterior painting and similar activities) involving the use of commercially available products (e.g., pesticides, herbicides, gas, oil, paint, etc.) the use of which would not create a significant hazard to the public. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.
- c) **No Impact.** The nearest school is Bryn Mawr Elementary School located 0.5-miles southwest of the Project Site. No schools exist within a quarter-mile of the Project Site. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- d) **No Impact.** Pursuant to California Government Code Section 65962.5, the California Department of Toxic Substances Control (DTSC) compiles the Cortese List and updates it at least annually. The Cortese List includes hazardous waste facilities subject to corrective action, land designated as hazardous waste property or border zone property, sites included in the abandoned site assessment program, and qualifying sites pursuant to Section 25356 of the Health and Safety Code. A copy of the most recent Cortese List was retrieved from DTSC EnviroStor online database on May 20, 2022; the Project Site is not identified on the list. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- e) **No Impact.** The Project Site is not located within an airport land use plan and is not within two miles of a public airport. The Project Site is located outside of Redlands Municipal Airport Compatibility Map (Figure 2A) and outside the Airport Compatibility Zones in the City of Redlands General Plan Figure 7.7: Airport Hazards. The Proposed Project would not change air traffic patterns or create a safety hazard to people or aircraft. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- f) **No Impact.** The Project Site does not contain any emergency facilities. During construction the contractor would be required to maintain adequate emergency access for emergency vehicles as required by the City. Development of the site with single-family residential homes would not interfere with an adopted emergency response or evacuation plan. Access to the future residential development would be provided via San Timoteo Canyon Road and would be maintained for ingress/egress.

The California Emergency Services Act requires the City to manage and coordinate the overall emergency and recovery activities within its jurisdictional boundaries. The City's Emergency Operations Plan includes policies and procedures to be administered by the City in the event of a disaster. During disasters, the City of Redlands is required to coordinate emergency operations with the San Bernardino County. Policies within the City's General Plan and updates to the City's Emergency Plan, as required by State law,

would ensure the Proposed Project would not interfere with adopted policies and procedures. Therefore, no impacts have been identified or anticipated, and no mitigation measures are required.

- g) **No Impact.** The Project Site is located in an area with moderate threat to fire hazards.³ It is not located within a High or Very High Fire Hazard Severity Zone. The Project Site is surrounded by development to the north, east and south and proposed residential development (TTM 20404) to the west within the City of Loma Linda. The proposed residential development would replace the existing vegetation on site with impervious surface (sidewalks, roads), and single-family structures with fire safety and fire suppression design elements (i.e., tile and composite roofs), and landscaping with irrigation, thereby reducing the risk of wildfire. Development of the Proposed Project shall comply with the California Fire Code. Therefore, the Proposed Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
10. HYDROLOGY AND WATER QUALITY. <i>Would the project:</i>				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	()	()	(✓)	()
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede substantial groundwater management of the basin?	()	()	(✓)	()
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	()	()	(✓)	()
i) result in substantial erosion or siltation on- or off-site;	()	()	(✓)	()
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	()	()	(✓)	()

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

Issues and Supporting Information Sources:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 substantial groundwater management plan?	()	()	(✓)	()

- a) **Less Than Significant Impact.** The Proposed Tentative Tract Map 20402 would disturb approximately 21.6 acres and is therefore subject to the National Pollution Discharge Elimination System (NPDES) permit requirements. The State of California is authorized to administer various aspects of the NPDES. Construction activities covered under the State's General Construction permit include the removal of vegetation, grading, excavating, or any other activity that causes the disturbance of one acre or more. The General Construction permit requires recipients to reduce or eliminate non-storm water discharges into stormwater systems, and to develop and implement a SWPPP. The SWPPP is based on the principles of Best Management Practices (BMPs) to control and abate pollutants. The SWPPP must include BMPs to prevent project-related pollutants from impacting surface waters. The purpose of a SWPPP is to: 1) identify pollutant sources that may affect the quality of discharges of storm water associated with construction activities; and 2) identify, construct and implement storm water pollution control measures to reduce pollutants in storm water discharges from the construction site during and after construction.

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

- b) **Less Than Significant Impact.** The Project Site is located within the City of Redlands water service area. Redlands' water supply is comprised primarily of surface water from the Santa Ana River (SAR) and Mill Creek and supplemented by groundwater extracted from the Bunker Hill Basin (part of the San Bernardino Basin) and Yucaipa Basin and a small amount of imported water when needed. ⁴

⁴ Water Systems Consulting, Inc. and Woodard & Curran. 2020 Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan.

The Urban Water Management Plan for City of Redlands is based on projected growth included in their service area. The buildout population was estimated assuming 2.65 persons per household. The proposed 27 single-family residential lots would result in an estimated population of 72 and a water demand of 20,088 gallons per day⁵. The Proposed Project is consistent with the land use and population projections included in the General Plan. Therefore, the Proposed Project water demand is already anticipated from buildout of the General Plan Planning Area. Moreover, implementation of the Project's Best Management Practices (BMPs) would ensure that stormwater discharge does not substantially alter the existing drainage pattern and water quality, thereby allowing runoff from the Project Site to be utilized as a resource that can eventually be used for groundwater recharge. Therefore, the Proposed Project is not anticipated to have a substantial impact on groundwater supplies or interfere substantially with groundwater recharge. No significant impacts are identified or anticipated, and no mitigation measures are required.

c) **Less Than Significant Impact.**

- i) Erosion is the wearing away of the ground surface as a result of the movement of wind or water, and siltation is the process by which water is affected by fine mineral particles in the water. Soil erosion could occur due to a storm event. The Construction General Permit requires the development and implementation of a SWPPP. The SWPPP must list BMPs to avoid and minimize soil erosion. Adherence to BMPs would prevent substantial soil erosion or the loss of topsoil. Therefore, no adverse significant impacts have been identified or anticipated, and no mitigation measures are required.
- ii, iii) A Preliminary Hydrology Report was prepared in May 2021 for the Project Site by ProActive Engineering Consultants and is included as Appendix G to this Initial Study and is summarized herein.

The study examined the hydrology impacts associated with the Proposed Project and included the preparation of hydrology calculations for existing and proposed conditions. The study examined the differences between pre-and post-development flows to identify the appropriate preliminary infiltration basin size and potential downstream impacts to the San Timoteo Creek. Due to the size of the watershed (less than 640 acres), the rational method was used to calculate the peak runoff at each concentration point for the existing and proposed conditions. The point precipitation value for the 100-year event was used in the rational method analysis. Accommodating to the City of Redlands policy of mitigating developed condition discharge to 80% of existing flows, the hydrograph method was used to size the required bioretention basin for the Project. Point precipitation values for the 100-year event were used in the hydrograph analysis.

For the proposed condition, residential land use would generally maintain the existing drainage pattern on-site. Runoff would be conveyed via surface flows to the proposed catch basins and outlet into a proposed combined infiltration/water quality basin. From here, flows would exit via a designated discharge point and

⁵ Based on City of Redland's 2020 water demand of 279 gallons per capita per day.

travel west across San Timoteo Canyon Road to join the adjacent site of TTM 20404 where a single connection to San Timoteo Creek is proposed.

The Project Site drainage for TTM 20402 is tributary to the San Timoteo Creek. The existing ground surface generally slopes from southeast to northwest in the 1% to 2% range. The Project Site is a minor tributary of the Santa Ana River Watershed and ultimately outlets to the Santa Ana River located northwest of the site.

		Proposed Condition	Outflow % of Existing Q100
Project Site	Peak Inflow (Q100)	42.3 cfs	63%
	Max Storage volume	0.18 ac-ft	
	Peak Outflow	29.0 cfs	

Preliminary hydrology for the Project at TTM 20402 has been completed for the existing and proposed 100-year events. With the use of an infiltration basin, the proposed peak flow has been mitigated to less than 80% of the existing flow as required by the City of Redlands. Since the proposed flow has been mitigated to meet city requirements, no downstream impacts to the San Timoteo Creek are expected.

- d) **No Impact.** Due to the inland distance from the Pacific Ocean and any other significant body of water, tsunamis and seiches are not potential hazards at the site. The Project Site is located outside of the 500-year floodplain.⁶ Therefore, the risk of release of pollutants due to project inundation is low. No impacts are identified or anticipated, and no mitigation measures are required.
- e) **Less Than Significant Impact.** Requirements of a NPDES permit to be issued for the Proposed Project would include development and implementation of a SWPPP and is subject to RWQCB review and approval. The purpose of an SWPPP is to: 1) identify pollutant sources that may affect the quality of discharges of stormwater associated with construction activities; and 2) identify, construct and implement stormwater pollution control measures to reduce pollutants in stormwater discharges from the construction site during and after construction. The SWPPP would include BMPs to control and abate pollutants and treat runoff that can be used for groundwater recharge. The Proposed Project would not otherwise substantially degrade water quality as appropriate measures relating to water quality protection would be implemented. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

⁶ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017. Figure 3.9-2 "Flood Hazards."

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
11. LAND USE AND PLANNING. <i>Would the project:</i>				
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?	()	()	()	(✓)

Discussion:

- a) **No Impact.** The physical division of an established community is typically associated with construction of a linear feature, such as a major highway or railroad tracks, or removal of a means of access, such as a local road or bridge, which would impair mobility in an existing community or between a community and an outlying area. The Proposed Project does not include the construction of a linear feature, and the Project Site is currently vacant. Therefore, the Proposed Project would neither physically divide an established community nor cause a significant environmental impact due to conflict with any land use plans or policies. No impacts would occur, and no mitigation measures are required.
- b) **No Impact.** The Project Site is currently undeveloped and has a land use designation of Very Low Density Residential and is currently zoned Agricultural. The proposed residential uses are consistent with the General Plan and the applicable development standards for the site. The Project Site is adjacent to existing residential development to the north, east, and south, and future residential development to the west (TTM 20404).

The designation of Very Low-Density Residential permits detached single-family dwellings at densities up to 2.7 du/ac on slopes of up to 15 percent, and 0.4 du/ac (1 unit per 2.5 acres) on slopes ranging from 15 to 30 percent.

Although the A-1 zoning district requires parcels to be five acres or more, State Bill 330 (SB 330) allows the project to be developed with the residential density supported by the General Plan without a zone change. The Applicant proposing a subdivision, which will utilize the Estate Residential (R-E) zoning district's development standards to design the Project with a density that is consistent with the underlying General Plan density. The Proposed Project includes 27 single-family lots (1.3 dwelling units per gross acre), ranging from 20,000 square feet up to 43,719 square feet, which is less than the 56 dwelling units allowed for the Project Site based on the allowable General Plan Density (2.7 dwelling units per acre) and would not exceed the density limit of *Very Low Density Residential* as established in the General Plan.

Therefore, the Proposed Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No significant impacts are identified or anticipated, and no mitigation measures are required.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
12. MINERAL RESOURCES. <i>Would the project:</i>				
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?	()	()	()	(✓)

Discussion:

- a,b) **No Impact.** According to the California Department of Conservation, Open File Report 94-08 the Project Site and surrounding area are designated Mineral Resource Zone 3 (MRZ-3). The MRZ-3 designation indicates that significance of mineral deposits within the area cannot be evaluated from the available data due to urbanization. The Proposed Project would not result in the loss of availability of a known mineral resource or locally-important mineral resource recovery site delineated on a local plan that would be of value to the region and the residents of the State because the Project Site occurs within an urbanized area that is surrounded by existing and proposed residential development. No impacts are identified or anticipated and no mitigation measures are required.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
12. NOISE. <i>Would the project result in:</i>				
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?	()	()	()	(✓)

Discussion:

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

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

Construction Noise - Best Management Practices

1. All construction equipment, whether fixed or mobile, will be equipped with properly operating and maintained mufflers, consistent with manufacturer standards.
2. All stationary construction equipment will be placed so that emitted noise is directed away from the noise sensitive receptors nearest the project site.
3. As applicable, all equipment shall be shut off when not in use.
4. Equipment staging in areas shall be located to create the greatest distance between construction-related noise/vibration sources and existing sensitive receptors.
5. Jackhammers, pneumatic equipment, and all other portable stationary noise sources will be directed away and shielded from existing residences in the vicinity of the project site. Either one-inch plywood or sound blankets can be utilized for this purpose. They should reach up from the ground and block the line of sight between equipment and existing residences. The shielding should be without holes and cracks.
6. No amplified music and/or voice will be allowed on the project site.
7. Haul truck deliveries will not occur outside of the hours presented as exempt for construction per City's Municipal Code Sections 8.06.120 (G) and 8.06.090.

Post-construction noise from implementation of the Proposed Project would not result in any significant increase of noise to the surrounding area as no significant vehicle trips would result from the development and future residents would be required to abide by the City's Municipal Code.

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

- b) **Less Than Significant Impact.** Construction activities can produce vibration that may be felt by adjacent land uses. Construction equipment may result in vibration levels that are considered annoying at nearby sensitive receptors when vibration causing equipment is within 100 feet of a receptor. The nearest sensitive receptors (single-family homes) are located over 100 feet to the northwest, east and south of the Project Site. The Proposed Project includes construction of 27 residential dwelling units. However,

vibration produced by construction activities would be short-term and temporary. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

- c) **No Impact.** The Project Site is not located within an airport land use plan and is not within two miles of a public airport. The Project Site is located outside of Redlands Municipal Airport Compatibility Map (Figure 2A) and outside the Airport Compatibility Zones in the City of Redlands General Plan Figure 7.7: Airport Hazards. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
14. POPULATION AND HOUSING. <i>Would the project:</i>				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	()	()	(✓)	()
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	()	()	()	(✓)

Discussion:

- a) **Less Than Significant Impact.** Between 2016 and 2045, Southern California Association of Governments (SCAG) projects that the number of households in Redlands will grow from 24,400 to 30,800 (a 26% increase).⁷ As of 2020, Redlands' population was estimated to be 73,168. By 2045, SCAG projects that Redlands' population will grow to 80,800. The Proposed Project is a planned residential development of 27 single-family residential lots. The population from General Plan buildout was estimated assuming 2.65 persons per household in Redlands.⁸ The proposed 27-lot subdivision would result in an estimated population of 72. The Proposed Project would account for approximately 0.9 percent of the projected 25-year growth in Redlands. The Project Site is currently undeveloped and designated VLDR (20,000 square-foot minimum lot). The Proposed Project includes 27 single-family lots, ranging from 20,000 square feet to 43,719 square feet and would have less units than the 56 dwelling units allowed for the Project Site. The Proposed Project is an allowable use within the VLDR District. Therefore, population growth from the Proposed Project was anticipated for build-out of the Planning Area. No significant adverse impacts are identified or anticipated, and no mitigation measures are required.
- b) **No Impact.** The Project Site is currently undeveloped. Implementation of the Proposed Project would neither displace existing housing nor require construction of replacement housing elsewhere. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

⁷ Michael Baker International. 2021-2029 Housing Element - Revised Public Revised Draft. December 2021.

⁸City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.

Issues and Supporting Information Sources:	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?	()	()	(✓)	()

Discussion:

a) **Less Than Significant Impact.**

Fire Protection – Fire protection is provided by the City of Redlands Fire Department (emergency operations, fire prevention services, and emergency medical services). The majority of Redlands is well-served by the four Redlands Fire Stations, while the outer edges of the Planning Area may receive faster response times from surrounding jurisdictions. The Redlands Fire Department aims for National Fire Protection Association (NFPA) standards, which recommend that the first arriving unit arrive within four minutes 90 percent of the time. A more lenient goal of arriving seven minutes 90 percent of the time, per 2008 High-Level Fire Department Review for the Redlands Fire Department, is a more realistic objective given the 2015 response time of nine minutes. Development of the Proposed Project may incrementally increase the demand for fire protection services as it could increase the local area's population by approximately 72 additional residents. The Proposed Project is required to provide a minimum of fire safety and support fire suppression activities, including type and building construction, fire sprinklers, and paved fire access. The Fire Department and the Building Division (part of the Development Services Department) enforce fire safety standards during review of building plans and inspections. The City maintains a joint response/automatic aid agreement with the fire departments in neighboring cities including Colton, Loma Linda, and San Bernardino. Following receipt of required development fees (including permit and inspection fees) would ensure impacts to fire protection services are lessened. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation is required.

Police Protection –The City of Redlands Police Department (RPD) provides police protection for the Project Site and vicinity. The service ratio for the City is 1.1 officers per 1,000 residents. Though the City does not have a service ratio standard, the City recognizes that its ratio falls below the national average of 2.1, and that hiring additional officers would be optimal.⁹ In 2015, the Department had an average response time of 6.5 minutes for police services. Although there are no industry standards for response time to emergency calls, according to the City of Redlands, a response time of 4.5 minutes is desirable in a city of Redlands' size. Development of the proposed Project may incrementally increase the demand for police protection services due to the increased population of residents on the site. In its review of new development plans, the RPD evaluates project plans on its ability to provide proper police protection to the development. Additionally, the proponent of the Proposed Project would be required to pay service and development fees to the RPD. Such fees would be used to fund capital costs associated with acquiring land for new police stations, constructing new police stations, purchasing crime-fighting equipment for new police stations, and providing for additional staff as needed and as identified by the City. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Schools The Redlands Unified School District (RUSD) provides public schools in the Planning Area, which includes the Project Site. The following schools provide educational services to the project area: Smiley Elementary School, Cope Middle School, and Redlands High School.¹⁰ The Proposed Project would increase the population in the local and would consequently add students to the local school system. The RUSD has accounted for the generation of its student population through its facilities planning activities based on the City's buildout. Development of the Proposed Project has been included in the buildout of the General Plan; as such, RUSD does not anticipate further growth in its boundary that would exceed planned development associated with the City's buildout. Construction and operation of new school facilities would be funded through school impact fees assessed on new developments that occur within the school district. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Parks –The Redlands Parks Division currently operates 18 parks.¹¹ The residents of the Proposed Project are anticipated to increase the use of nearby parks. In 2035, with the development of 140.9 acres of proposed parkland as designated in the General Plan, and the addition of 10,355 residents, the ratio will be 6.9 acres per 1,000 residents, which would exceed the City's park standard of 5 acres per 1,000 people.¹²

The Redlands Municipal Code provides for open space and park fees to be imposed as a condition of approval of new residential, commercial, and office and industrial development (Chapter 3.32). The fees are intended to ensure that open space lands and active and passive parks are made available to the public concurrent with the need for such lands and parks caused by new development. They may be used to pay for costs incurred by the City for acquiring, developing, improving, and expanding open space areas, scenic drives, parks, playgrounds, and recreational facilities to meet the

⁹ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.

¹⁰ <https://ca01900901.schoolwires.net/site/handlers/filedownload.ashx?moduleinstanceid=101&dataid=10515&FileName=High-2013-2014.pdf>

¹¹ City of Redlands. City-Owned and Operated Parks. <https://www.cityofredlands.org/parks>

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

increased needs for those facilities resulting from the effects of new development. Collection of developer impact fees would ensure no significant impacts to parks would occur. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

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

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
16. RECREATION. <i>Would the project:</i>				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	()	()	()	(✓)
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?	()	()	()	(✓)

Discussion:

- a) **No Impact.** The Redlands Parks Division currently operates 18 parks.¹³ In 2035, with the development of 140.9 acres of proposed parkland as designated in the General Plan, and the addition of 10,355 residents, the ratio will be 6.9 acres per 1,000 residents, which would exceed the City's park standard of 5 acres per 1,000 people.¹⁴

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

¹³ City of Redlands. City-Owned and Operated Parks. <https://www.cityofredlands.org/parks>

¹⁴ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.

areas, scenic drives, parks, playgrounds, and recreational facilities to meet the increased needs for those facilities resulting from the effects of new development. Collection of developer impact fees would ensure no significant impacts to parks would occur. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

- b) **No Impact.** The Proposed Project includes five lettered lots including a 0.4-acre detention basin (Lot A), 1.6-acre open space lot (Lot B), and a total of 22,393 square feet of landscaping (Lots C, D and E). The remaining lettered lots are located along the eastern property boundary and are required for additional wildfire protection. Development of these lots and its potential environmental impacts have been analyzed and discussed throughout this environmental document. Impacts pertaining to the development of the on-site open space would be less than significant. No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

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

Discussion:

- a) **No Impact.** The General Plan promotes an efficient and integrated circulation system by enhancing the vehicular, biking, walking, and transit networks. The following analysis details Project consistency with the applicable proposed actions:

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

Consistency: The Proposed Project would be required to provide right-of-way easements, thereby allowing emergency vehicles to pass through the internal roads

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

Consistency: A future bicycle route is planned along San Timoteo Canyon Road adjacent to the Project Site.¹⁵ The Proposed Project would be required to provide right-of-way easements, which would allow for future bicycle and trail improvements along the roadway.

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

Consistency: The Project Site is adjacent to San Timoteo Canyon Road. The Proposed Project would be required to provide right-of-way easements, which would allow for future bicycle and trail improvements along the roadway.

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

Consistency: The proposed 27 residential lots would share the same main entry points, “A Street” and “C Street.” The Proposed Project includes driveways and garage space for each residential lot, and off-street parking within the proposed interior streets.

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

Consistency: The Proposed Project would include local interior streets “A,” “B” and “C,” which would connect to San Timoteo Canyon Road (minor arterial)¹⁶ via “A” and “C” streets. In addition, the Proposed Project would provide a landscape buffer along the eastern property boundary. The cul-de-sacs have pedestrian/bike connections at the terminus that would connect the sidewalks within the interior streets.

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

Consistency: The nearest bus stop is provided by Omnitrans approximately 1,500 feet northeast of the Project Site at the intersection of Barton Road and Terracina Boulevard. The residents of the Proposed Project would be able to access San Timoteo Canyon Road via pedestrian connections at the cul-de-sacs to proposed “A Street” and “C Street” and proceed north toward Barton Road.

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

¹⁵ Dyett and Bhatia. City of Redlands General Plan 2035. Adopted December 5, 2017. Figure 5-3: “Bicycle Facilities.”

¹⁶ Dyett and Bhatia. City of Redlands General Plan 2035. Adopted December 5, 2017. Figure 5-5: “Roadway Classification.”

- b) **Less Than Significant Impact.** A Trip Generation and Vehicle Miles Traveled (VMT) Assessment, dated October 16, 2021, was prepared for the Proposed Project by Translutions, Inc. (see Appendix H) and is summarized herein.

The Proposed Project trips were estimated using trip generation rates obtained from the Institute of Transportation Engineers' (ITE) Trip Generation Manual (10th Edition) for land use code 210 (Single-Family Detached Housing). The Proposed Project is anticipated to generate 255 daily trips, 19 AM peak hour trips, and 25 PM peak hour trips during an average weekday.

The City adopted thresholds of significance and screening thresholds under VMT in July 2020. The City's guidelines include several screening thresholds including: 1) Project Location within a Transit Priority Area; 2) Project Location within a Low VMT Area; and 3) By Type or Project or Land Use. The Proposed Project includes 27 single-family homes, and therefore, meets the third screening threshold, which exempts and presumes less than significant impacts for projects with up to 167 single-family homes. Therefore, a detailed project-specific VMT calculation is not required. No significant impacts are identified or anticipated, and no mitigation measures are required.

- c) **Less Than Significant Impact.** The Proposed Project includes a request to approve TTM 20402 to subdivide 21.6-acres into 27 single-family residential lots and five lettered lots. The Project would not result in a geometric design or incompatible use that would substantially increase hazards in the area. The Proposed Project would be compatible with the surrounding residential uses. The design of the proposed streets must provide adequate sight distance and traffic control measures. The developer has incorporated a traffic signal into the project design to be constructed at Nevada Street and San Timoteo Canyon Road. Conditions of Approval will require the proposed traffic signal to be constructed prior to the completion of the project. Roadway frontage improvements in and around the Project site would be designed and constructed to satisfy all City requirements for street widths, corner radii, and intersection control, as well as incorporate design standards tailored specifically to site access requirements. The Site Plan is subject to approval by the City of Redlands Fire Department. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.
- d) **Less Than Significant Impact.** Access to the Project Site would be provided by two entry points along San Timoteo Canyon Road. The Proposed Project will comply with Section 18.164.080 Single-Family Residential Dwellings, of the City Municipal Code requiring the Proposed Project to provide two covered parking spaces in a garage or carport for every dwelling unit. All proposed interior streets would be 60-foot-wide, allowing sufficient space for street parking and residential traffic. Therefore, residents and their visitors are not anticipated to park along San Timoteo Canyon Road. During construction, the contractor would be required to maintain adequate emergency access for emergency vehicles. Post-construction activities would not interfere with an adopted emergency response or evacuation plan. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

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

Discussion:

- a) i) **Less Than Significant Impact.** The City of Redlands has criteria for historic eligibility. Although based on National Register and California Register criteria, it is slightly more detailed and expansive, with 11 eligibility criteria listed in Chapter 2.62, Article II of the Redlands Municipal Code.

During the field survey the remnants of historic-period elements of a former citrus grove designated MBI2006-H-1 were identified. Based on conclusions of the Cultural Resource Assessment, MB12006-H-1 is not locally eligible under Chapter 2.62, Article II of the Redlands Municipal Code. No significant impacts have been identified or anticipated and no mitigation measures are warranted.

- ii) **Less Than Significant Impact with Mitigation.** California Assembly Bill 52 (AB52) was approved by Governor Brown on September 25, 2014. AB52 specifies that CEQA projects with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource may have a significant effect on the environment. As such, the bill requires lead agency consultation with California Native American tribes traditionally and culturally affiliated with the geographic area of a proposed project, if the tribe requested to the lead agency, in writing, to be informed of proposed projects in that geographic area. The legislation further requires that the tribe-requested consultation be completed prior to determining whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project.

In November 2021, the City provided notification to the following tribes in accordance with AB52: Gabrieleno Band of Mission Indians – Kizh Nation (Gabrieleno), Soboba Band of Luiseno Indians (Soboba), San Manuel Band of Mission Indians (San Manuel), Torres Martinez Desert Cahuilla Indians, Luiseño Indians, Morongo Band of Mission Indians, Pechanga Band of Luiseño Indians, Rincon Band of Mission Indians, and Soboba Band of Luiseño Indians.

As of the date of preparation of this Initial Study, only San Manuel Band of Mission Indians provided correspondence and requested a copy of the cultural report, geotechnical report and project plans. No information or evidence has been provided to the City to indicate a possibility or likelihood of the presence of tribal cultural resources on or near the project site. However, the City has agreed to implement mitigation measures in the event of any inadvertent discovery of tribal cultural resources. Upon receipt of the above-referenced reports and plans, the tribe requested the following mitigation measures be made conditions of approval for the project:

TCR-1: The San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed in CR-3, of any pre-contact and/or historic-era cultural resources discovered during project implementation and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a Cultural Resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with SMBMI, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents SMBMI for the remainder of the project's construction and grading activities, should SMBMI elect to place a monitor on-site.

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

Issues and Supporting Information Sources:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
19. UTILITIES AND SERVICE SYSTEMS. <i>Would the project:</i> a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications, the construction or relocation of which could cause significant environmental effects?	()	()	(✓)	()

Issues and Supporting Information Sources:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	()	()	(✓)	()

Discussion:

- a) **Less Than Significant Impact.** The Project Site is located within the City of Redlands water service area. The Proposed Project would include the development of on-site water delivery infrastructure through 8-inch water pipes in the proposed interior streets as well as laterals serving each of the 27 proposed residential units. The Proposed Project would connect to a 12-inch water line along San Timoteo Canyon Road and the existing 8-inch water line along New Jersey Street. The environmental impacts from the construction of on-site water lines are anticipated to be negligible.

The nearest City sewer is located at the intersection of Nevada Street and Barton Road; approximately 2,100 feet north of the Project Site. In accordance with City of Redlands Municipal Code 13.44.080: When Sewer Not Available, several alternatives to provide sewer service to the Project site were analyzed. As demonstrated in the February 2021 Canyon Ranch – City of Redlands Sewer Alternatives Memorandum, septic systems for each of the individual lots was determined to be the most feasible alternative. Per approval from the State Water Resources Control Board and concurrence from the City of Redlands, septic sewer is a viable alternative provided that the average lot size is at least on-half acre. The current Site Plan meets this minimum requirement, therefore septic tanks can be installed for each individual residential lot and no significant impacts would result. Therefore, no adverse significant impacts are identified or anticipated, and no mitigation measures are required.

The Proposed Project would be serviced by Southern California Edison (SCE), which provides electrical service to the general area. There are existing utility poles on the east side of San Timoteo Canyon Road that the Proposed Project would connect to. Southern California Gas (SoCal) would provide natural gas for the Proposed Project. There are existing natural gas distribution lines along San Timoteo Canyon Road that the Proposed Project would connect to.

Runoff from the residences will be conveyed via street flow to catch basins proposed throughout the Project Site, ultimately draining to the project low point located near the southeast corner of the Project Site, just prior to discharge onto San Timoteo Canyon Road. Low flows will be directed to Lot A in order to address Storm Water Quality Low Impact Development requirements. Overflows in excess of the LID capture requirements will be discharged via a proposed storm drain out to San Timoteo Canyon Road.

The Proposed Project would be served by Verizon for landline requirements and Time Warner Cable for cable. The Proposed Project is not anticipated to require the expansion or construction of new communications systems facilities.

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

- b) **Less Than Significant Impact.** The Project Site is located within the City of Redlands water service area. Redlands' water supply is comprised primarily of surface water from the Santa Ana River (SAR) and Mill Creek and supplemented by groundwater extracted from the Bunker Hill Basin (part of the San Bernardino Basin) and Yucaipa Basin and a small amount of imported water when needed.¹⁷ The UWMP for City of Redlands is based on projected growth for their service area.

Per UWMP requirements, Redlands has evaluated reliability for an average year, single dry year, and a five consecutive dry year period. Redlands' demands in single dry years are assumed to increase by 10 percent above normal year demands. The local groundwater basins Redlands produces water from have storage for use in dry years so Redlands. Redlands' supplies are 100 percent reliable during normal and single dry years.¹⁸ Moreover, Redlands can produce the volume of water needed to meet 100 percent of demands in multiple dry years.¹⁹

The population from General Plan buildout was estimated assuming 2.65 persons per household in Redlands.²⁰ The proposed 27 residential units would result in an estimated population of 72 and a water demand of 20,088 gallons per day.²¹ The Proposed Project is consistent with the land use and population projections as reviewed in the General Plan. Therefore, the Proposed Project water demand is already anticipated from buildout of the General Plan Planning Area. Since the City has sufficient water supplies to meet current and future development consistent with its General Plan through the year 2035, additional water storage and treatment facilities are not anticipated to be required through buildout of the General Plan in 2035. No significant impacts are identified or anticipated, and no mitigation measures are required.

¹⁷ Water Systems Consulting, Inc. and Woodard & Curran. 2020 Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan.

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

¹⁹ Water Systems Consulting, Inc. and Woodard & Curran. 2020 Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan.

²⁰ Dyett and Bhatia. City of Redlands General Plan Update and Climate Action Plan EIR. July 21, 2017.

²¹ Based on City of Redland's actual 2020 water demand of 279 gallons per capita per day.

- c) **No Impact.** The Project includes the construction of on-site septic tanks for the 27 single-family residential lots. The Project would not result in any direct impacts and increase demand on a wastewater treatment provider. No impacts have been identified or anticipated and no mitigation measures are required.
- d) **Less Than Significant Impact.** Solid waste from Redlands is primarily disposed of at the California Street Landfill operated by the Quality of Life Department and the San Timoteo Sanitary Landfill operated by San Bernardino County; both occur within the city limits. The California Street Landfill is located at 2151 Nevada Street and encompasses 115 acres and has a design capacity of 11.4 million cubic yards, with a maximum permitted capacity of 10 million cubic yards. The facility has a maximum permitted throughput of 829 tons per day. As of July 25, 2018, it has a remaining capacity of 5,168,162 cubic yards. The San Timoteo Sanitary Landfill is located on San Timoteo Canyon Road and has a permitted capacity of 20,400,000 cubic yards and a maximum permitted daily throughput of 2,000 tons per day. As of April 30, 2019, the remaining capacity was 12,360,396 cubic yards. The Proposed Project includes 27 residential units. According to CalRecycle's estimated solid waste generation rates for single-family units, the Proposed Project would generate approximately 270 pounds of solid waste per day or approximately 0.14 tons per day, based on 10²² pounds per unit per day, which represents approximately 0.007 percent of San Timoteo Sanitary Landfill's maximum throughput, and 0.02 percent of the California Street Landfill's maximum throughput. Proposed development would not generate a significant amount of additional solid waste into the City's waste stream; impacts to the solid waste collection system would be less than significant.
- e) **Less Than Significant Impact.** The Proposed Project would be required to comply with City of Redlands Municipal Chapter 13.66 (Recycling Requirements for Specified Developmental Activity). Chapter 13.66 establishes requirements for recycling by specified development activities to facilitate the City's compliance with state recycling mandates, remove architectural barriers to recycling and ensure the recycling of construction and demolition waste. The Project Applicant is required to coordinate with a waste hauler to collect solid waste on a common schedule as established in applicable local, regional, and State programs. The Proposed Project shall adhere the California Integrated Waste Management Act of 1989 (AB 939), AB 1327, Chapter 18 (California Solid Waste Reuse and Recycling Access Act of 1991), and any other applicable local, State, and federal solid waste management regulations. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

²² CalRecycle. Estimated Solid Waste Generation Rates. Accessed May 20, 2022.

Issues and Supporting Information Sources:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
20. WILDFIRE - 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) **No Impact.** The Project Site does not contain any emergency facilities, however San Timoteo Canyon Road up to New Jersey Street is identified as a San Bernardino County Transportation Authority evacuation route²³. During construction, the Project Proponent would be required to maintain adequate emergency access for emergency vehicles. The Proposed Project would not interfere with an adopted emergency response or evacuation plan and all construction activities (including staging) would occur within the project site boundaries; therefore, no impacts are identified or are anticipated and no mitigation measures are required.

b) **Less than Significant impact with Mitigation.** Prolonged droughts coupled with high winds and dry vegetation during summer months can create a high fire risk in southern California. The area is subject to Santa Ana winds; defined by the National Weather Service as "strong down slope winds that blow through the mountain passes in southern California. These winds, which can easily exceed 40 miles per hour, are warm and dry and can severely exacerbate brush or forest fires, especially under drought conditions." These winds, which typically occur several times per year between September and December, have been known to topple power lines, trees, and streetlights and can also spread uncontrolled wildfire and hinder firefighters from reaching fires.

Currently, the Project Site is occurring in a Moderate Risk area for fires. However, based on future updates by CalFire, the area could be re-mapped as occurring in a

²³ City of Loma Linda 2021 Updated Safety Element, Figure 10.5, Evacuation Routes.

potential very high fire severity zone. On April 28, 2022, Firewise 2000, LLC. prepared a Fire Protection Plan (FPP) for the Proposed Project. A copy of the report is attached as Appendix I to this Initial Study and is summarized herein.

The FPP assesses the overall (on-site and off-site) wildland fire hazards and risks that may threaten life and property associated with the Proposed Project. In addition, the FPP establishes both short-term and long-term vegetation management actions required to minimize any projected wildland fire hazards and assigns annual maintenance responsibilities for each of the required Vegetation Management actions.

As identified in the FPP, any wildfire burning in the undeveloped easterly open space areas, adjacent to the Project Site would create a high wildland fire hazard, putting developed properties at risk. The FPP outlines requirements for protecting the proposed development through a series of Management Zones. Vegetation maintenance within Vegetation Management Zone 0 - Irrigated and Zone 1, would be the responsibility of the homeowner and common areas (Vegetation Management Zone 2 – Irrigated) would be maintained by a Homeowner Association (HOA). A description of each of the zones is as follows:

Zone 0 - Irrigated is an area that begins at the structure then extends out five feet. The zone includes the area under and around all attached decks and requires the most stringent wildfire fuel reduction. This area must be clear of combustibles, landscaping mulch, and any large shrubs and trees. It may have limited plants that are low growing, nonwoody, properly watered and maintained. Combustible fencing material shall not be attached to the structure.

Zone 1 must be free of all combustible construction and materials. It is an irrigated zone surrounding the structure. It is measured from the exterior walls of the structure or from the most distal point of a combustible projection. It provides the best protection against the high radiant heat produced by wildfire. It also provides a generally open area in which fire suppression forces can operate during wildfire events. This zone includes a level or level-graded area around the structure.

Zone 2 is an area maintained by a HOA and includes specific plant types, irrigation requirements, and maintenance schedule.

Specific requirements as outlined in the FPP shall be incorporated as mitigation and be made conditions of project approval for the Project. Final plans would require review and approval by the Fire Marshal. Therefore, significant adverse impacts have been identified and the following mitigation measures shall be implemented:

WF-1: The Project Proponent shall ensure that requirements of the April 2022 Fire Protection Plan are provided within the notes section of the final site plan for the Project.

WF-2: Prior to the issuance of building permits, the Fire Marshal shall review final site plans to ensure requirements provided in the April 28, 2022 Fire Protection Plan are addressed.

- c) **No Impact.** The Proposed Project includes the construction of 27 single-family residences and associated infrastructure including internal roadways, and construction

of on-site water and septic systems to serve the development. A risk of fire from these activities would not result. Therefore, no impacts have been identified or anticipated and no mitigation measures are required.

- d) **Less Than Significant Impact.** The Project Site occurs outside of any FEMA flood risk exposure²⁴. As discussed, the Project Site occurs within Very High Fire Severity Zone. Post construction activities associated with single-family homes is not associated with a high fire hazard risk. Implementation of requirements outlined in the FPP would ensure that vegetation around homes and the Project Site is maintained. Therefore, the Proposed Project would not risk the loss, injury, or death involving pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, or 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. No significant adverse impacts have been identified or anticipated and no mitigation measures are required.

Issues and Supporting Information Sources:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
21. MANDATORY FINDINGS OF SIGNIFICANCE					
a)	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	()	()	(✓)	()
b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	()	()	(✓)	()
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	()	()	(✓)	()

Discussion:

- a) **Less Than Significant Impact.** During the field survey the remnants of historic-period elements of a former citrus grove designated MBI2006-H-1 were identified. As concluded in the Cultural Resources Assessment, MBI2006-H-1 is not eligible under any of the four criteria for listing on the California Register and is not an historical resource

²⁴ City of Loma Linda General Plan, Figure 10.3.

under CEQA. In addition, it is not locally eligible under Chapter 2.62, Article II of the Redlands Municipal Code.

The Project Site is primarily composed of undeveloped, disturbed habitat which consists of heavily disturbed/compacted soils. Historic aerial imagery from 1994 through 2020 (Google, Inc. 2021) shows that citrus groves encompassed the Project Site from 1994 to 2005. Further, routine weed abatement activities (i.e., disking, tilling) throughout the Project Site have eliminated any natural vegetation communities. Areas including residential land uses to the north, east and south, and vacant, disturbed land formerly used as a palm farm were observed west of the Project Site.

A total of 77 special-status wildlife species are recorded in the USGS *Redlands, Riverside East, San Bernardino South, and Sunnymead, California* 7.5-minute quadrangles. Based on the results of the field survey and a review of specific habitat preferences, occurrence records, known distributions, and elevation ranges, the BRA concluded that the Project Site has a high potential to support sharp-shinned hawk (*Accipiter striatus*; a State WL species), burrowing owl (*Athene cunicularia* [BUOW]; a State Species of Special Concern [SSC]), California horned lark (*Eremophila alpestris actia*; a State WL species), loggerhead shrike (*Lanius ludovicianus*; a State SSC), and San Diego black-tailed jackrabbit (*Lepus californicus bennettii*; a State SSC); and a moderate potential to support Vaux's swift (*Chaetura vauxi*; a State SSC). All remaining special-status wildlife species either have a low potential or are not expected to occur within the Project Site.

To avoid and/or minimize potential impacts to biological resources, mitigation measures BIO-1 through BIO-8 shall be made conditions of project approval.

No significant adverse impacts would occur or are anticipated and no mitigation measures are warranted.

- b) **Less Than Significant Impact.** Individual impacts associated with the Proposed Project would not be considered adverse or unfavorable. The Project is not anticipated to generate significant amounts of air pollutants, traffic or noise. No significant cumulative adverse impacts are expected with implementation of the proposed development, as the majority of the area is developed.

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

The analysis in Section III, Air Quality, found that impacts would be less than significant; therefore, the Project would not contribute to localized or regional cumulative impacts. Additionally, the analysis in Section IV found that no individual impacts to sensitive species would occur with incorporation of Mitigation Measures **BIO-1** through **BIO-8**. The Project would have no other impacts on biological resources and would not result in localized or regional cumulative impacts.

Loss of unknown archaeological or paleontological resources could reduce or eliminate important information relevant to cultural resources; therefore, Mitigation Measures **CUL-1** through **CUL-6** and **GEO-1** and **GEO-2** are required to reduce impacts to archaeological and paleontological resources, as well as buried Native American remains and cultural resources. Implementation of the mitigation measures would eliminate any potential loss of important local archaeological information or Native American remains unknown at the Project Site. Therefore, the proposed Project would have no contribution to a cumulative loss of important local or regional historical, archaeological, or paleontological knowledge.

- c) **Less Than Significant Impact.** Development of the site as proposed would not cause adverse impacts on humans, either directly or indirectly.

Based on the analysis of the Project's impacts within this Initial Study, there is no indication that this Project could result in substantial adverse effects on human beings. Implementation of mitigation measures **WF-1** and **WF-2** would ensure potential impacts from wildfire are reduced to a less than significant level. Although there would be a variety of temporary adverse effects during construction, these would be reduced to less than significant levels through mitigation. Long-term effects include increase vehicular traffic, traffic-related noise, use of standard commercially available hazardous materials (i.e., house paint, petroleum products), emissions of criteria pollutants and greenhouse gas emissions, and increased demand for water use, and electrical use. Based on the analysis in this Initial Study, direct and indirect impacts to human beings would be less than significant with mitigation incorporated. Therefore, no adverse impacts have been identified or anticipated and no additional mitigation measures are warranted.

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