APPENDIX A
LAND EVALUATION AND SITE ASSESSMENT

April 20, 2022

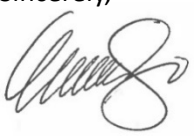
Johanna Crooker, Forward Planning Manager
MLC Holdings, Inc.
5 Peters Canyon Road, Suite 310
Irvine, CA 92606

Subject: **Land Evaluation and Site Assessment Model Letter Report for the Song and Emm Properties, City of Redlands, San Bernardino County, California**

Dear Ms. Crooker:

The attached letter report and exhibits summarize the findings of the Land Evaluation and Site Assessment (LESA) Model for the Song and Emm Properties in the City of Redlands, in San Bernardino County, California. The results indicated that the development of the proposed industrial building would not have a significant impact on loss of Important Farmland. Please let us know if you have any questions or would like additional information.

Sincerely,



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Enc: Attachment A: Exhibits
Attachment B: Land Evaluation and Site Assessment Model Scoring Table

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SONG AND EMM PROPERTIES LAND EVALUATION AND SITE ASSESSMENT MODEL

Project Location

The approximately 14.61-acre project site is located in the City of Redlands, in San Bernardino County, California. The site is generally bounded by Interstate 210 (west), orange groves/future Bergamot Specific Plan residential uses (north), Citrus Valley High School (east), and West Pioneer Avenue (south). The project site is located on the *Redlands, California* United States Geological Survey (USGS) 7.5-minute Topographic Quadrangle Map, Township 1 South, Range 3 West, Section 16 (Latitude 34° 4' 48" North; Longitude 117° 11' 55" West). The Santa Ana River is located approximately 0.5 mile north of the project site.

Project Summary

The project applicant, MLC Holdings, is proposing to develop 117 residential units (at a density of 8.1 units per acre) on the project site.

Existing Conditions

The project site contains undeveloped land. The California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) maps 14.45 acres of the project site as Grazing Land; 0.09 acre as Prime Farmland; 0.05 acre as Urban Built-Up Land; and 0.02 acre as Farmland of Statewide Importance; refer to Exhibit 1. The entire project site contains 14.49 acres of Hanford sandy loam, 0-2 percent slopes (HbA) and 0.13 acre of Tujunga Loamy Sand, 0-5 percent slopes (TuB); Refer to Exhibit 2.

Pursuant to the California Environmental Quality Act (CEQA), Appendix G Checklist, a LESA Model was prepared to determine the significance of the conversion of the project site to permanent nonagricultural use.

LESA Model Findings

The LESA Model is divided into two components: Land Evaluation and Site Assessment. The following narrative describes the model inputs. The weighting factor for each input is shown in parenthesis.

Land Evaluation (50 percent)

Land Capability Classification (25 percent)

The project site contains 14.49 acres of Hanford sandy loam, 0-2 percent soils (Land Capability Classification [LCC] I) and 0.13 acre of Tujunga Loamy Sand, 0-5 percent slopes (LCC 4e). Hanford sandy loam, 0-2 percent soils is considered a prime agricultural soil while Tujunga Loamy Sand, 0-5 percent slopes is not. Because Hanford sandy loam, 0-2 percent slopes, constitutes 99 percent of the project site and has a high LCC, the overall LCC score is **99.5**. (25 percent of this score is 24.9).

Storie Index Rating (25 percent)

The Storie Index is a quantitative rating of the agricultural value of the soils (0 to 100). The higher the score, the better the soil. Hanford sandy loam, 0-2 percent slopes, has a Storie Index of 81. Tujunga Loamy Sand, 0-5 percent slopes, has a Storie Index of 65. Because Hanford sandy loam, 0-2 percent slopes, constitutes 99 percent of the project site and has a high Storie Index, the overall Storie Index score is **80.84**. (25 percent of this score is 20.2)

The Total Land Evaluation Score is 24.9 + 20.2 = **45.1.**

Site Assessment (50 percent)

Project Size (15 percent)

The project site consists of 14.49 acres of LCC I soils (Exhibit 2). The LESA Model assigns 30 points for project size for project sites that are between 10 and 19 acres that contain LCC I soils. The overall project size score is 3**0**. (15 percent of this score is 4.5)

Water Availability (15 percent)

Given the lack of surface water delivery canals and the project site's proximity to the Santa Ana River (approximately 0.5 mile north of the project site),[1] it is assumed that groundwater is the principal source of irrigation water. Although the project site is located within the Redlands city limits and, thus, in theory has access to municipal water, no service connections are known to exist. Furthermore, using municipal water to irrigate commercial agricultural crops would be prohibitively expensive. Thus, it was conservatively assumed that the project site had access to groundwater with no physical or economic restrictions during non-drought and only physical restrictions in drought years. The water availability score is **85**. (15 percent of this score is 12.8)

Surrounding Agricultural Lands (15 percent)

The LESA Model assigns points when Important Farmland accounts for 40 percent or more of surrounding land uses. Properties within 0.25 mile of the project site total 397.73 acres. There are 89.44 acres of Prime Farmland and 17.31 acres of Farmland of Statewide Importance; refer to Exhibit 3. In total, Important Farmland represents 26.8 percent of the surrounding acreage. The remaining 73.2 percent of the surrounding acreage consist of non-Important Farmland designations (e.g., Urban and Built-up Land and Grazing Land). Because less than 40 percent of the surrounding acreage consists of Important Farmland, the surrounding agricultural land score is **0**. (15 percent of this score is 0)

Protected Resource Lands (5 percent)

The LESA Model assigns points when Protected Resource Lands accounts for 40 percent or more of surrounding land uses. Protected resource lands are those with active Williamson Act Contracts for

[1] In addition to conveying surface water flows, rivers also convey substantial subsurface groundwater flows.

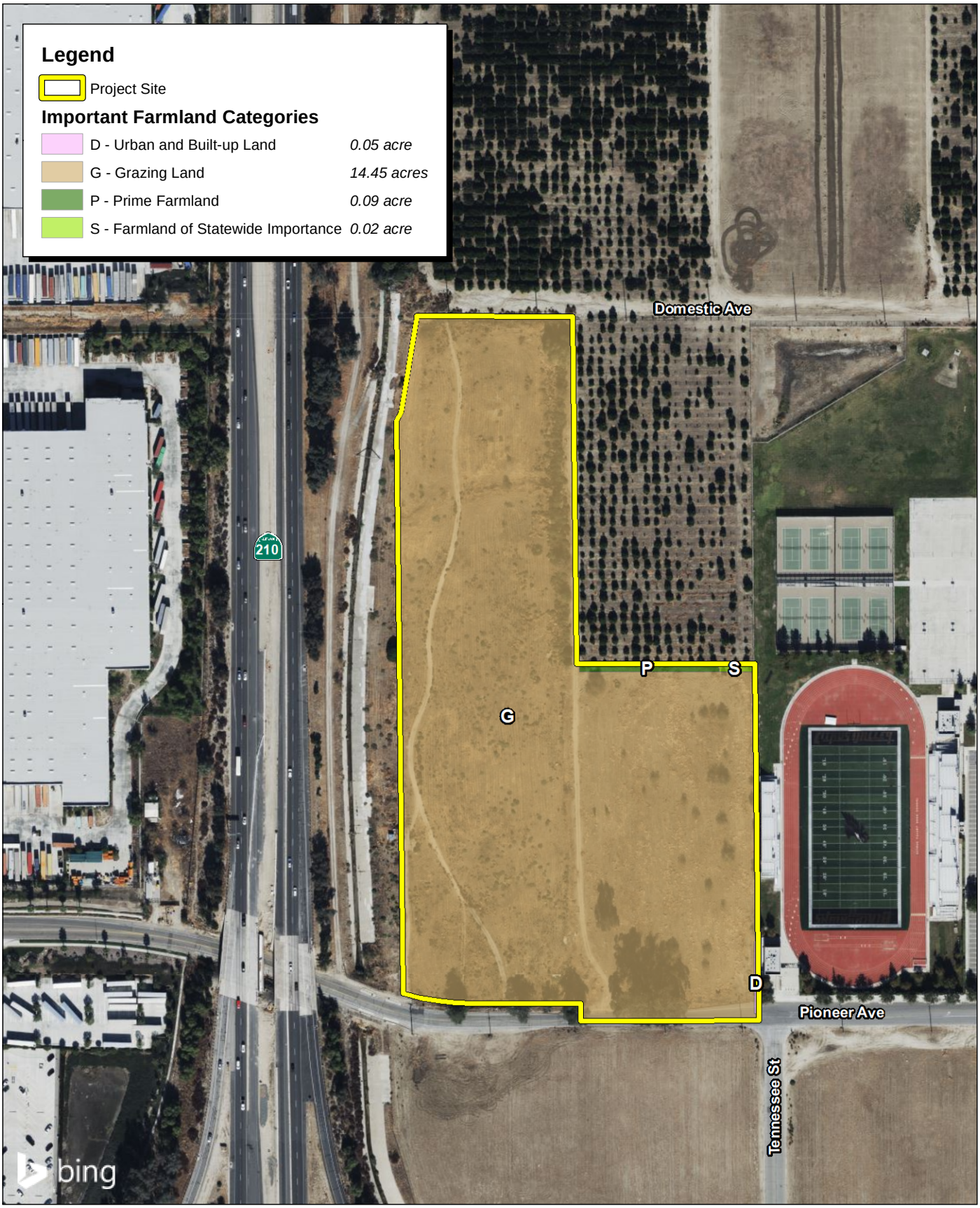
which Notices of Non-Renewal have not been filed. There are no active Williamson Act Contracts within the Zone of Influence. The Protected Resource Lands score is **0**. (5 percent of this score is 0)

The Total Site Assessment score is 4.50 + 12.75 + 0 + 0 = **17.3.**

Conclusions

When the weighting factors are applied, the project site yields a LESA Model score of 62.3. For projects that score between 60 and 79 points, LESA Model significance criteria indicates that this is a significant impact unless either the Land Evaluation or Site Assessment sub-scores are less than 20 points. In this case, the Land Evaluation sub-score is **45.1** points, but the Site Assessment sub-score is **17.2** points. Therefore, the proposed project's conversion of agricultural land to nonagricultural use is *not considered significant* for the purposes of CEQA.

Attachment A:
Exhibits



Source: Bing Aerial Imagery. CA Department of Conservation San Bernardino County FMMP, 2018.

FIRSTCARBON SOLUTIONS™

250 125 0 250
Feet

Exhibit 1
Important Farmland Map

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CITY OF REDLANDS
EMM PROPERTY
LAND EVALUATION AND SITE ASSESSMENT MODEL

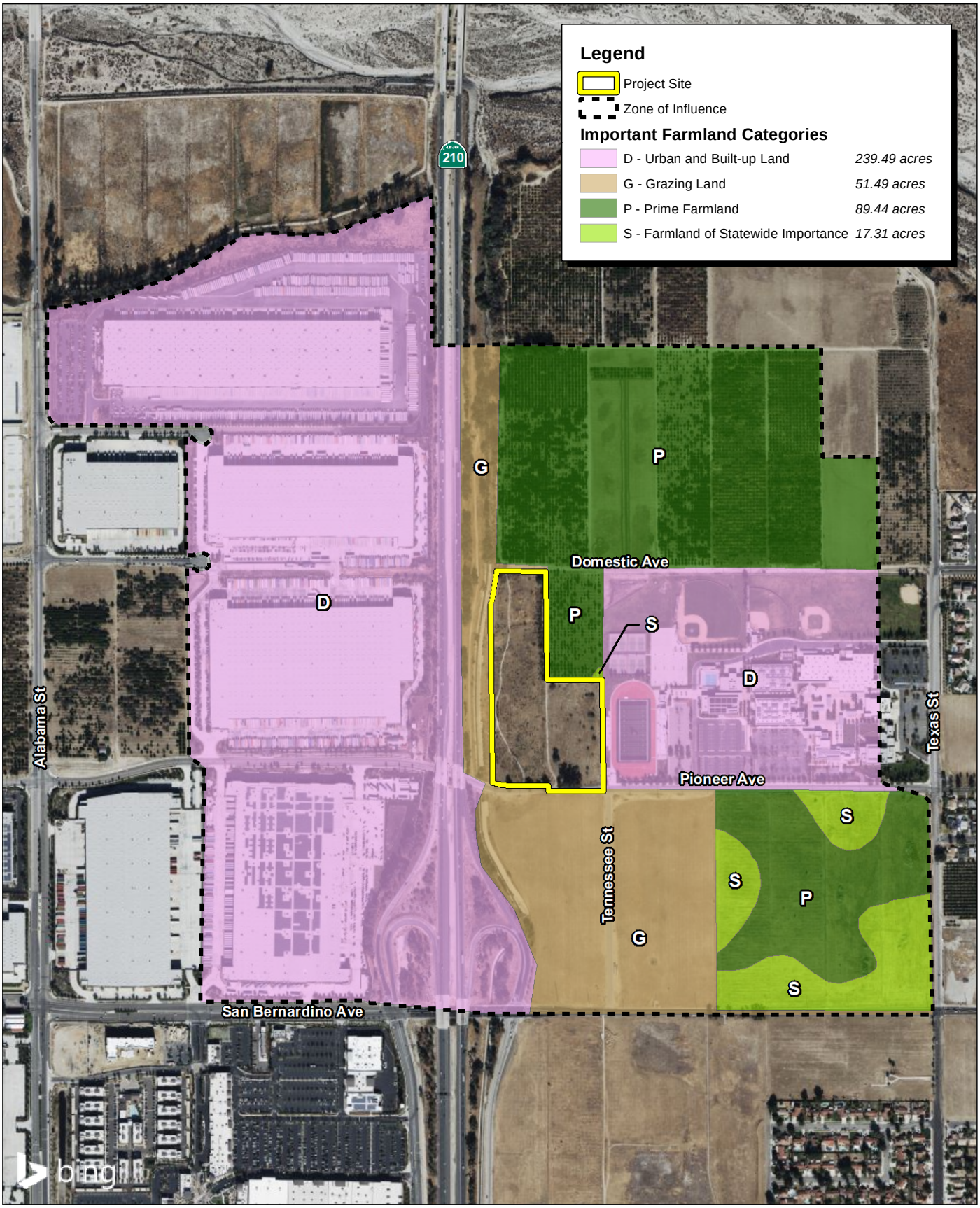


Source: Bing Aerial Imagery. USDA Soils Data, San Bernardino County.

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Exhibit 2
Soils Map



Source: Bing Aerial Imagery. CA Department of Conservation San Bernardino County FMMP, 2018.

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800 400 0 800
Feet

Exhibit 3
Zone of Influence Map

Attachment B:
Land Evaluation and Site Assessment Model Scoring Table

Land Capability Classification (LCC) and Storie Index Scores

Soil Map Unit	Project Acres	Proportion of Project Area	LCC	LCC Rating	LCC Score	Storie Index	Storie Index Score
HbA	14.49	0.99	I	100	99.00	81	80.19
TuB	0.13	0.01	IVe	50	0.50	65	0.65
TOTAL	14.62	1			99.5		80.84

Project Size Score

	LCC Class I-II	LCC Class III	LCC Class IV-VIII	N/A
Total Acres	14.49		0.13	
Project Size Scores	30	0	0	0

Highest Project Size Score 30

Table 3-Proj. Size Scoring

LCC Class I-II		LCC C III
Acres	Score	Acres
80 +	100	160 +
60-79	90	120-159
40-59	80	80-119
20-39	50	60-79
10-19.	30	40-59
fewer than 10	0	20-39
		10-19.
		fewer than 10

Total Class I	Total Class II	Total Cl

Total Acres 14.49
Score 30

TOTAL PROJECT SIZE RATING= 30

Class I	LCC Class IV-VIII	
Score	Acres	Score
100	320 +	100
90	240-319	80
80	160-239	60
70	100-159	40
60	40-99	20
30	fewer than 40	0
10		
0		

ass III	Total Class IV	Total Class V
	0.13	
	0	

Project Portion		Water Source	Proportion	Water Availability Score		Weighted Availability Score (C x D)
	1	Irrigation District Water Only				0
	2	Groundwater only	1		85	85
	3	Both irrigation and ground				0
	4	Not irrigated at all				0
		Total	1	Total water resource score		85

Table 5. Water Resource Availability Scoring

Option	Non-Drought Years			Drought Years			WATER RESOURCE SCORE
	RESTRICTIONS			RESTRICTIONS			
	Irrigated Production Feasible?	Physical Restrictions ?	Economic Restrictions ?	Irrigated Production Feasible?	Physical Restrictions ?	Economic Restrictions ?	
1	YES	NO	NO	YES	NO	NO	100
2	YES	NO	NO	YES	NO	YES	95
3	YES	NO	YES	YES	NO	YES	90
4	YES	NO	NO	YES	YES	NO	85
5	YES	NO	NO	YES	YES	YES	80
6	YES	YES	NO	YES	YES	NO	75
7	YES	YES	YES	YES	YES	YES	65
8	YES	NO	NO	NO	-- --	-- --	50
9	YES	NO	YES	NO	-- --	-- --	45
10	YES	YES	NO	NO	-- --	-- --	35
11	YES	YES	YES	NO	-- --	-- --	30
12	Irrigated production not feasible, but rainfall adequate for dryland production in both drought and non-drought years						25
13	Irrigated production not feasible, but rainfall adequate for dryland production in non-drought years (but not in drought years)						20
14	Neither irrigated nor dryland production feasible						0

in

Table 6: Surrounding Ag Land Rating

Percent of Project's Zone of Influence	Surround Ag Land Score
90-100%	100 points
80-89	90
75-79	80
70-74	70
65-69	60
60-64	50
55-59	40
50-54	30
45-49	20
40-44	10
<40	0

Table 7: Surrounding Protected Resource Land Score

Percent of Project's Zone of Influence	Surround Ag Land Score
90-100%	100 points
80-89	90
75-79	80
70-74	70
65-69	60
60-64	50
55-59	40
50-54	30
45-49	20
40-44	10
<40	0

Section III. Weighting of Factors and Final LESA Scoring

The California LESA Model is weighted so that 50 percent of the total LESA score of a given project is derived from the Land Evaluation factors, and 50 percent from the Site Assessment factors. Individual factor weights are listed below, with the sum of the factor weights required to equal 100 percent.

Land Evaluation Factors

Land Capability Classification	25%
Storie Index Rating	25%
Land Evaluation Subtotal	**50%**

Site Assessment Factors

Project Size	15%
Water Resource Availability	15%
Surrounding Agricultural Lands	15%
Surrounding Protected Resource Lands	5%
Site Assessment Subtotal	**50%**
Total LESA Factor Weighting	**100%**

Each factor is measured separately (each on 100 point scale) and entered in the appropriate line in **Column B** of the **Final LESA Scoresheet** (Table 8). Each factor's score is then multiplied by its respective factor weight, resulting in a weighted factor score in **Column D** as indicated in Table 8. The weighted factor scores are summed, yielding a Total LESA Score (100 points maximum) for a given project, which is entered in **Line 7** of **Column D**.

Factor Name	Factor Rating (0-100 points)	X	Factor Weighting (Total=1.0)	=	Weighted Factor Rating
Land Evaluation					
1. Land Capability Classification	99.5		0.25		24.9
2. Storie Index Rating	80.84		0.25		20.2
	Subtotal		0.5		45.1
Site Assessment					
1. Project Size	30		0.15		4.5
2. Water Resource Availability	85		0.15		12.8
3. Surrounding Agricultural Lands	0		0.15		0.0
4. Protected Resource Lands	0		0.05		0.0
	Subtotal		0.5		17.3
				TOTAL	62.3

Table 9. California LESA Model Scoring Thresholds

Total LESA Score	Scoring Decision
0 to 39 Points	Not Considered Significant
40 to 59 Points	Considered Significant only if LE and SA subscores are each greater than or equal to 20 points
60 to 79 Points	Considered Significant unless either LE or SA subscore is less than 20 points
80 to 100 Points	Considered Significant