KAISER PERMANENTE MEDICAL CENTER

Initial Study

CEQA Analysis Prepared for:

City of Redlands
35 Cajon Street, Suite 20
Redlands, CA 92373
Attn: Kevin Beery, Senior Planner

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PROJECT INFORMATION SHEET

1. Project Title	Kaiser Permanente Medical Center
2. CEQA Lead Agency	**City of Redlands** 35 Cajon Street, Suite 20 Redlands, CA 92373 Kevin Beery, Senior Planner (909) 798-7555 x. 1797 kbeery@cityofredlands.org
3. Project Applicant	Deborah Wong, Senior Land Use Manager **Kaiser Foundation Hospitals** 393 E. Walnut Ave., 4th Floor Pasadena, CA 91188
4. Project Location	1301 California Street Redlands, CA 92374
5. Assessor's Parcel Numbers	APN 0167-441-07-000
6. Project Site General Plan Designation(s)	Commercial Industrial
7. Project Site Zoning Designation(s)	Medical Facilities District, Concept Plan 1 (CP-1) in the East Valley Corridor Specific Plan
8. Surrounding Land Uses and Setting	The project site is surrounded by warehouse/industrial buildings on all sides, including one currently under construction to the south.
9. Description of Project	The project site contains a medical office building, parking lot, and vacant land. Over four phases, the proposed project would ultimately develop the vacant portions of the project site with two medical office buildings, an ambulance service center, a hospital, a parking structure, a central utilities plant, a hospital expansion, and related improvement including parking lots, driveways, utilities, and landscaping. Refer to **Section 3.0** of this document for additional information. The project applicant is requesting the following discretionary approvals, which are discussed in detail in **Section 3.0** of this document: • Amendment to Concept Plan No. 1 • Development Plan

10. Selected Agencies whose Approval is Required	• City of Redlands • California Department of Health Care Access and Information (HCAI) • South Coast Air Quality Management District (SCAQMD) • San Bernardino County Department of Public Health, Division of Environmental Health Services (EHS) (Medical Waste Permit)
11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code § 21080.3.1? If so, has consultation begun?	Letters were sent by the City of Redlands (the Lead Agency), to local Native American tribes asking if they wished to participate in SB 18 and AB 52 consultation concerning the proposed project in the City of Redlands. Tribes have up to 30 days in which to respond to AB 52 notification and 90 days to SB 18 notification of the project. For the proposed project, 29 tribe(s) that could potentially request consultation were contacted by the City per Public Resources Code § 21074. There was a response received from the Gabrieleño Band of Mission Indians – Kizh Nation and consultation is on-going.
12. Other Public Agencies	Agencies that will review the proposed project include the following: • California Regional Water Quality Control Board – Santa Ana • HCAI • SCAQMD • San Bernardino County Department of Public Health, Division of Environmental Health Services (Medical Waste Permit)

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ACRONYMS AND ABBREVIATIONS

Acronym/ Abbreviation	Term
AAQS	Ambient Air Quality Standards
AB	(California) Assembly Bill
ACM(s)	Asbestos-Containing Material(s)
ADA	Americans with Disabilities Act
AFY	Acre-Feet per Year
AIA	Airport Influence Area
AMI	Area Median Income
AMSL	Above Mean Sea Level
APE	Area of Potential Effect
APN	Assessor's Parcel Number
AQA	Air Quality Analysis
AQMP	Air Quality Management Plan
AR4	Fourth Assessment Report
ARB	(California) Air Resources Board
ASC	Ambulatory Services Center
BAU	Business as Usual
BIOS	Biogeographic Information and Observation System
BMPs	Best Management Practices
BSA	Biological Survey Area
BUOW	Burrowing Owl
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CAL Green	California Green Building Standards
Cal/OSHA	California Division of Occupational Safety and Health
Caltrans	California Department of Transportation
CAO	Cleanup and Abatement Order
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CASGEM	California Statewide Groundwater Elevation Monitoring
CAT	Climate Action Team
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDO	Cease and Desist Order
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CEQA	California Environmental Quality Act
CFGC	California Fish and Game Code
CFS	Cubic Feet per Second

Acronym/ Abbreviation	Term
CGS	California Geological Survey
CH_4	Methane
CHRIS	California Historic Resources Inventory System
City	City of Redlands
CMP	Congestion Management Program
CMP	Corrugated Metal Pipe
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalent
CP	Concept Plan
CRC	California Residential Code
CWA	Clean Water Act
CY	Cubic Yards
DAMP	Drainage Area Management Plan
dB	Decibel
dBA	A-weighted decibel scale
DOC	California Department of Conservation
DOGGR	Division of Oil, Gas, and Geothermal Resources
DOSH	California Division of Safety and Health
DTSC	Department of Toxic Substances Control
du/ac	Dwellling units per acre
DWR	Department of Water Resources
ECAP	Energy and Climate Action Plan
EHS	Environmental Health Services
EIR	Environmental Impact Report
EMS	Emergency Medical Services
EO	Executive Order
EPA	(U.S.) Environmental Protection Agency
ESA	Endangered Species Act
ESA	Environmental Site Assessment
ESRL	Earth System Research Laboratory
EV	Electric Vehicle
EVCS	Electric Vehicle Charging Station
EVCSP	East Valley Corridor Specific Plan
°F	degrees in Fahrenheit
FAR	Floor Area Ratio
FEMA	Federal Emergency Management Agency
FEIR	Final Environmental Impact Report
FHSZ	Fire Hazard Severity Zones
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
GHG	Greenhouse Gases
GIS	Geographic Information System

Acronym/ Abbreviation	Term
GPCD	Gallons per Capita per Day
GPD	Gallons per Day
GWP	Global Warming Potential
HABS	Historic American Building Survey
HCAI	California Department of Health Care Access and Information
HCP	Habitat Conservation Plan
HFCs	hydroflourocarbons
HU	Hydrologic Unit
HVAC	Heating, Ventiliation and Air Conditioning
IBC	International Building Code
IPaC	Information, Planning and Conservation
IPCC	Intergovernmental Panel on Climate Change
ISA	International Society of Arboriculture
IS/MND	Initial Study / Mitigated Negative Declaration
ITE	Institute of Transportation Engineers
L_{90}	noise level that is exceeded 90% of the time
L_{eq}	equivalent noise level
LBP	Lead-Based Paint
LCC	Land Capacity Classification
LE	Land Evaluation
LESA	Land Evaluation and Site Assessment
LHMP	Local Hazard Mitigation Plan
LID	Low Impact Development
L_{max}	root mean square maximum noise level
LOS	Level of Service
LQGs	Large Quantity Generators
LRA	Local Responsibility Area
LSTs	Localized Significance Thresholds
LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
mgd	Million Gallons per Day
MLD	Most Likely Descendant
MM(s)	Mitigation Measure(s)
MMRP	Mitigation Monitoring and Reporting Program
$MMTCO_2e$	Million Metric Tons of CO2e
MND	Mitigated Negative Declaration
MOB	Medical Office Building
MPAH	Master Plan of Arterial Highways
MRZ	Mineral Resource Zone
MS4	Municiple Separate Storm Sewer permit
MT	Metric Tons
MUED	(Redlands) Municipal Utilities and Engineering Department
N_2O	Nitrous Oxide (dinitrogen oxide or dinitrogen monoxide)
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission

Acronym/ Abbreviation	Term
National Core	National Community Renaissance
NASA	National Aeronautics and Space Administration
NCCP	Natural Communities Conservation Plan
ND	Negative Declaration
NO	Nitric Oxide
NO_x	Nitrogen Oxides
NO_2	Nitrogen Dioxide
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NWI	National Wetlands Inventory
O_3	Ozone
OPR	Governor's Office of Planning and Research
OSHA	Occupational Safety and Health Administration
Pb	lead
PCB	Polychlorinated Biphenyl
PD	Planned Development
PEIR	Program Environmental Impact Report
PFCs	Perfluorocarbons
PM	Particulate Matter
PM_{10}	Respirable Particulate Matter
$PM_{2.5}$	Fine Particulate Matter
POP	Placentia Operations Plan
ppm	Parts per Million
PPV	Peak Particle Velocity
RCRA	Resource Conservation and Recovery Act
REC	Recognized Environmental Condition
RHNA	Regional Housing Needs Allocation
RMS	Root Mean Square
ROG	Reactive Organic Gases
ROW	Right-of-Way
RPS	Renewables Portfolio Standard
RUSD	Redlands Unified School District
RWQCB	Regional Water Quality Control Board
§	Section
SA	Site Assessment
SB	Senate Bill
SBCFD	San Bernardino County Fire Department
SBCTA	San Bernardino County Transportation Authority
SBIA	San Bernardino International Airport
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison Company
SD	Special Development

Acronym/ Abbreviation	Term
SF_6	Sulfur Hexafluoride
SIP	State Implementation Plan
SLF	Sacred Lands File
SMARA	Surface Mining and Reclamation Act
SMP	Sustainable Mobility Plan
SO_2	Sulfur Dioxide
SoCalGas	Southern California Gas Company
SR	(California) State Route
SRA	State Responsibility Area
SRAs	Source Receptor Areas
SRRE	Source Reduction and Recycling Element
STIP	Statewide Transportation Improvement Program
SUSMP	Standard Urban Stormwater Mitigation Plan
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAPs	Transportation Assembly Points
TCRs	Tribal Cultural Resources
TDM	Transportation Demand Management
TMP	Traffic Management Plan
UFPO	Urban Forest Protection Ordinance
UEI	UltraSystems Environmental, Inc.
U.S.	United States
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VdB	Vibration decibels
VCP	Vitrified Clay Pipe
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
WEG	Wind Erodibility Group
WQMP	Water Quality Management Plan
WRI	World Resources Institute
WSA	Water Supply Assessment
WTP	Wastewater Treatment Plant
ybp	Years Before Present
ZOI	Zone of Influence

1.0 INTRODUCTION

Proposed Project

The City of Redlands (City) is processing a request to implement legislative and discretionary actions that would ultimately allow for the development of the Redlands – Kaiser Permanente Medical Center (project) on the vacant portion of the Kaiser parcel located at 1301 California Street in the City of Redlands.

1.1.1 Project Components

The proposed project would develop the following project components in four separate phases:

- Ambulatory Services Center/Medical Office Building No. 2 (Phase 1);
- Hospital with associated support buildings, central utility plant / parking structure (Phase 2);
- Medical Office Building No. 3 (Phase 3);
- Possible expansion of Hospital (Phase 4).

1.1.2 Estimated Construction Schedule

Project construction and phasing information are summarized in **Section 3.0,** *Project Description*.

1.2 Lead Agencies – Environmental Review Implementation

The City of Redlands is the Lead Agency for the proposed project. Pursuant to the California Environmental Quality Act (CEQA) and its implementing regulations,[1] the Lead Agency has the principal responsibility for implementing and approving a project that may have a significant effect on the environment.

1.3 CEQA Overview

1.3.1 Purpose of CEQA

All discretionary projects within California are required to undergo environmental review under CEQA. A Project is defined in CEQA Guidelines § 15378 as the whole of the action having the potential to result in a direct physical change or a reasonably foreseeable indirect change to the environment and is any of the following:

- An activity directly undertaken by any public agency including but not limited to public works construction and related activities, clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements.
- An activity undertaken by a person which is supported in whole or in part through public agency contracts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.
- An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies.

1 Public Resources Code §§ 21000 - 21177 and California Code of Regulations Title 14, Division 6, Chapter 3.

CEQA Guidelines § 15002 lists the basic purposes of CEQA as follows:

- Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures (MMs) when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

1.3.2 Authority to Mitigate under CEQA

CEQA establishes a duty for public agencies to avoid or minimize environmental damage where feasible. Under CEQA Guidelines § 15041 a Lead Agency for a project has authority to require feasible changes in any or all activities involved in the project in order to substantially lessen or avoid significant effects on the environment, consistent with applicable constitutional requirements such as the "nexus"[2] and "rough proportionality"[3] standards.

CEQA allows a Lead Agency to approve a project even though the project would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that there is no feasible way to lessen or avoid the significant effect. In such cases, the Lead Agency must specifically identify expected benefits and other overriding considerations from the project that outweigh the policy of reducing or avoiding significant environmental impacts of the project.

1.4 Purpose of Initial Study

The CEQA process begins with a public agency making a determination as to whether the project is subject to CEQA at all. If the project is exempt, the process does not need to proceed any farther. If the project is not exempt, the Lead Agency takes the second step and conducts an Initial Study (IS) to determine whether the project may have a significant effect on the environment.

The purposes of an Initial Study as listed in § 15063(c) of the CEQA Guidelines are to:

- Provide the Lead Agency with information necessary to decide if an Environmental Impact Report (EIR), Negative Declaration (ND), or Mitigated Negative Declaration (MND) should be prepared.
- Enable a Lead Agency to modify a project to mitigate adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a ND or MND.
- Assist in the preparation of an EIR, if required, by focusing the EIR on adverse effects determined to be significant, identifying the adverse effects determined not to be significant, explaining the reasons for determining that potentially significant adverse effects would not be significant, and identifying whether a program EIR, or other process, can be used to analyze adverse environmental effects of the project.

2 A nexus (i.e., connection) must be established between the mitigation measure and a legitimate governmental interest.

3 The mitigation measure must be "roughly proportional" to the impacts of the Project.

- Facilitate an environmental assessment early during project design.
- Provide documentation in the ND or MND that a project would not have a significant effect on the environment.
- Eliminate unnecessary EIRs.
- Determine if a previously prepared EIR could be used for the Project.

In cases where no potentially significant impacts are identified, the Lead Agency may issue a ND, and no MMs would be needed. Where potentially significant impacts are identified, the Lead Agency may determine that MMs would adequately reduce these impacts to less than significant levels. The Lead Agency would then prepare a MND for the proposed project. If the Lead Agency determines that individual or cumulative effects of the proposed project would cause a significant adverse environmental effect that cannot be mitigated to less than significant levels, then the Lead Agency would require an EIR to further analyze these impacts.

1.5 Review and Comment by Other Agencies

Other public agencies are provided the opportunity to review and comment on the IS. Each of these agencies is described briefly below.

- A Responsible Agency (14 CCR § 15381) is a public agency, other than the Lead Agency, that has discretionary approval power over the Project, such as permit issuance or plan approval authority.
- A Trustee Agency[4] (14 CCR § 15386) is a state agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California.
- Agencies with Jurisdiction by Law (14 CCR § 15366) are any public agencies who have authority (1) to grant a permit or other entitlement for use; (2) to provide funding for the project in question; or (3) to exercise authority over resources which may be affected by the project. Furthermore, a city or county will have jurisdiction by law with respect to a project where the city or county having primary jurisdiction over the area involved is: (1) the site of the project; (2) the area in which the major environmental effects will occur; and/or (3) the area in which reside those citizens most directly concerned by any such environmental effects.

1.6 Impact Terminology

The following terminology is used to describe the level of significance of potential impacts:

- A finding of ***no impact*** is appropriate if the analysis concludes that the project would not affect the particular environmental threshold in any way.
- An impact is considered ***less than significant*** if the analysis concludes that the project would cause no substantial adverse change to the environment and requires no mitigation.
- An impact is considered ***less than significant with mitigation incorporated*** if the analysis concludes that the project would cause no substantial adverse change to the environment with the inclusion of environmental commitments, or other enforceable measures, that would be adopted by the lead agency.

4 The four Trustee Agencies in California listed in CEQA Guidelines § 15386 are California Department of Fish and Wildlife, State Lands Commission, State Department of Parks and Recreation, and University of California.

An impact is considered if there remains one huge unresolved issue: extending the TNM modeling to the "horizon year." At our meeting with Caltrans and the City, Sean Young said that he would think about our contention that the Caltrans guidance does not require horizon year modeling, and we did not do it for the Málaga Bridge project—and Sean approved our report. Please see if I could have authorization to talk directly to Sean about it.

If we have to do horizon year modeling it will take a few weeks, given how busy we are.

- if the analysis concludes that the project could have a substantial adverse effect on the environment.

An EIR is required if an impact is identified as ***potentially significant***.

1.7 Organization of Initial Study

This document is organized to satisfy CEQA Guidelines § 15063(d), and includes the following sections:

- **Section 1.0 - Introduction**, which identifies the purpose and scope of the IS.
- **Section 2.0 - Environmental Setting**, which describes location, existing site conditions, land uses, zoning designations, topography, and vegetation associated with the project site and surroundings.
- **Section 3.0 - Project Description**, which provides an overview of the project, a description of the proposed development, project phasing during construction, and discretionary actions for project approval.
- **Section 4.0 - Environmental Checklist**, which presents checklist responses for each resource topic to identify and assess impacts associated with the proposed project, and proposes MMs, as needed, to reduce potential environmental impacts to less than significant.
- **Section 5.0 - References**, which includes a list of documents cited in the IS.
- **Section 6.0 - List of Preparers**, which identifies the primary authors and technical experts that prepared the IS.

Technical studies and other documents will include supporting information or analyses used to prepare the Program EIR (PEIR).

1.8 Findings from the Initial Study

1.8.1 No Impact or Impacts Considered Less than Significant

Based on IS findings, the project would have no impact or a less than significant impact on the following environmental categories listed from Appendix G of the CEQA Guidelines.

- Agriculture and Forestry Resources
- Mineral Resources
- Population and Housing
- Recreation
- Wildfire

1.8.2 Potentially Significant

Based on IS findings, the project would have potentially significant impacts on the following environmental categories listed in Appendix G of the CEQA Guidelines and will be further evaluated in the PEIR.

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gases
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
- Transportation and Traffic
- Tribal Cultural Resources
- Utilities and Service Systems
- Mandatory Findings of Significance

2.0 ENVIRONMENTAL SETTING

2.1 Project Location

The proposed Redlands – Kaiser Permanente Medical Center project is located at 1301 California Street in the City of Redlands, California, on an approximately 37-acre site. Refer to **Figure 2.1-1**, which shows the project's location in a regional context. Local surface roadways adjacent to the site include Almond Avenue to the north, California Street to the east, and West Lugonia Avenue to the south. **Figure 2.1-2** depicts an aerial photo of the project site and the surrounding land.

2.2 Project Setting

The project site comprises one parcel – APN 0167-441-07-000. The project site contains a medical office building, a parking lot and vacant land. See **Figure 2.2-3**, which depicts the topography of the site and surrounding area. The project site has a relatively flat topography. Site photographs are provided in **Figure 2.2-4**.

2.2.1 Land Use and Zoning

The land use, zoning, and specific plan designations of the project site and its immediate vicinity are listed in **Table 2.2-1**. The project site has a General Plan land use designation of Commercial Industrial and a zoning designation of Medical Facilities District, Concept Plan 1 (CP-1) in the East Valley Corridor Specific Plan (City of Redlands, 2024a).

Table 2.2-1
SUMMARY OF EXISTING LAND USE, ZONING AND SPECIFIC PLAN DESIGNATIONS

Location	General Plan Designation	Zoning Designation	Existing Development
Project Site	Commercial Industrial	Medical Facilities District under Concept Plan 1 (CP-1)	Medical office building, parking lot, vacant land
North	Commercial Industrial	Concept Plan 1 (CP-1) under the East Valley Corridor Specific Plan	Distribution building
South	Commercial Industrial	Planned Development 3(PD3) and Special Development (EV/SD) under the East Valley Corridor Specific Plan	Distribution buildings (one under construction)
East	Commercial Industrial	Planned Development 1(PD1 and Special Development (EV/SD) under the East Valley Corridor Specific Plan	Distribution building
West	Commercial Industrial	Concept Plan 1 (CP-1) under the East Valley Corridor Specific Plan	Distribution building

Source: City of Redlands, 2024; Google Earth Pro, 2024

Figure 2.1-1
REGIONAL LOCATION

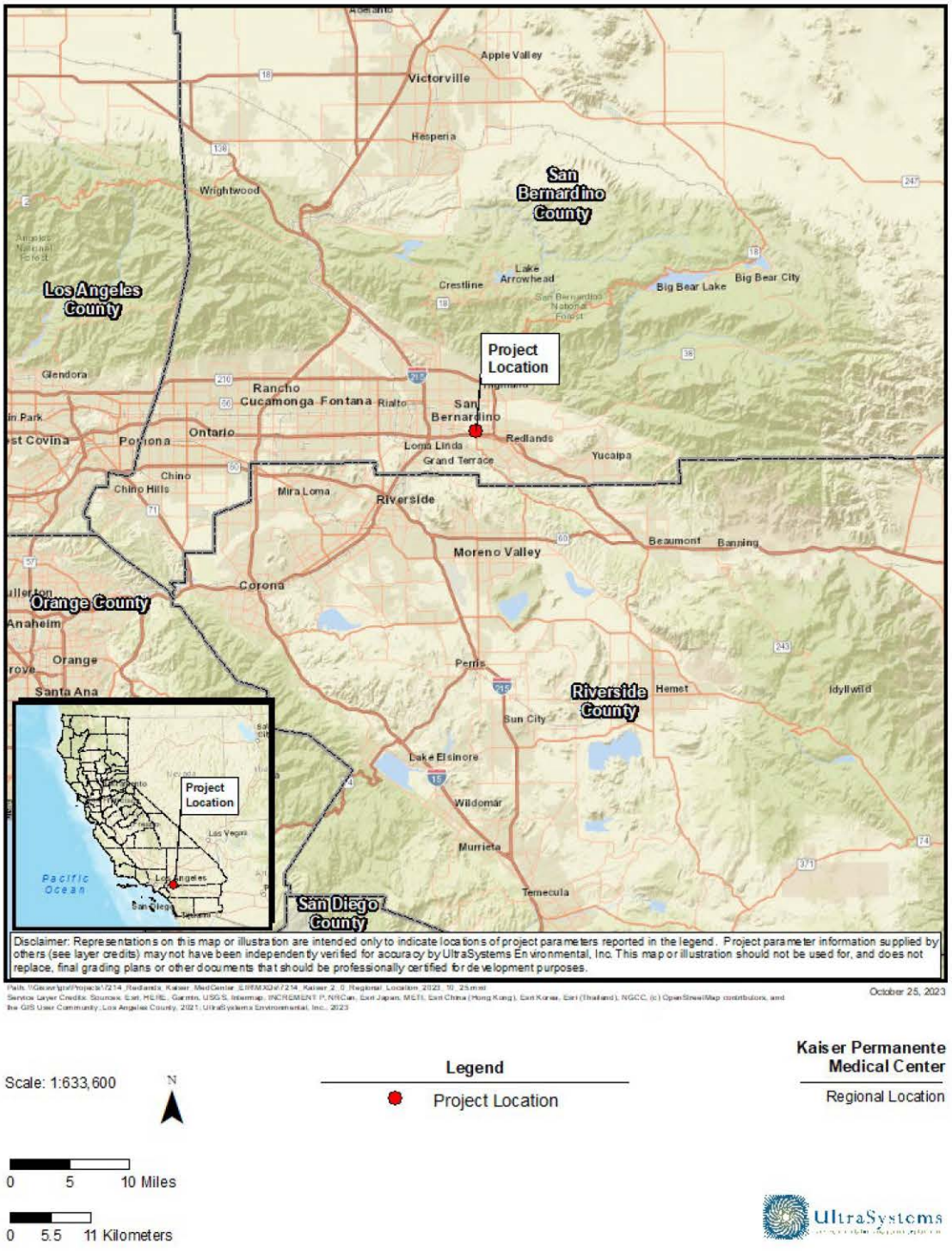


Figure 2.2-2
PROJECT LOCATION

Figure 2.2-3
TOPOGRAPHIC MAP

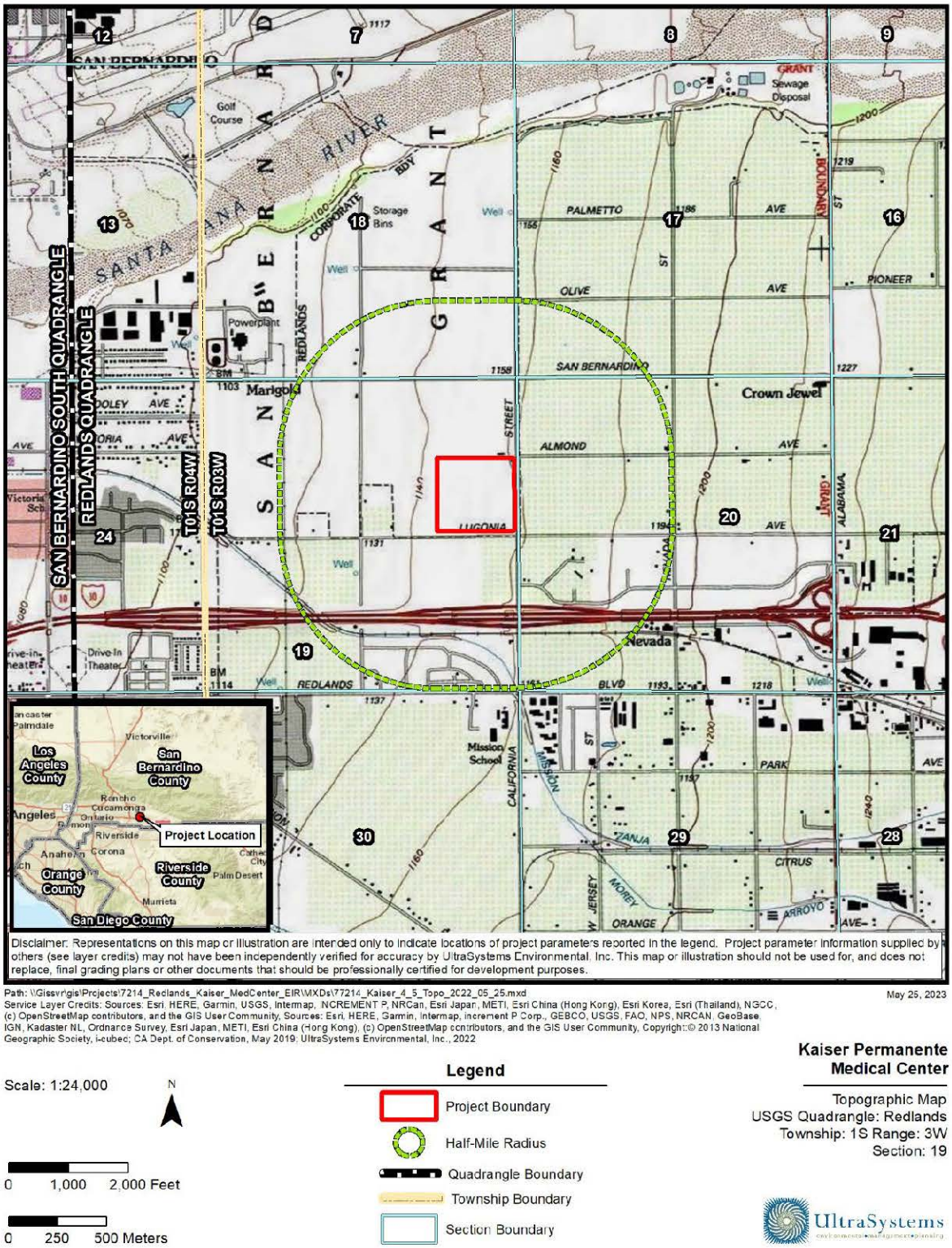


Figure 2.2-4
PROJECT SITE PHOTOGRAPHS

PHOTO 1: View looking at the northern portion of the project site along Almond Avenue.

PHOTO 2: View looking at the eastern portion of the project site along California Street.

PHOTO 3: View looking at the southern portion of the project site along West Lugonia Avenue.

PHOTO 4: View looking at the western portion of the project site along West Lugonia Avenue.

Source: Google Earth, 2023

2.3 Existing Characteristics of the Site

2.3.1 Climate and Air Quality

The project site is located within the South Coast Air Basin (SCAB), a 6,600-square-mile area including San Bernardino County. A persistent high-pressure area that commonly resides over the eastern Pacific Ocean largely dominates regional meteorology. The distinctive climate of this area is determined primarily by its terrain and geographic location. Local climate is characterized by warm summers, mild winters, infrequent rainfall, moderate daytime onshore breezes, and moderate humidity. Ozone (O_3) and pollutant concentrations tend to be lower along the coast, where the onshore breeze disperses pollutants toward the inland valley of the SCAB and adjacent deserts. However, as a whole, the SCAB fails to meet National Ambient Air Quality Standards (NAAQS) for O_3 and fine particulate matter ($PM_{2.5}$) and is classified as a "nonattainment area" for those pollutants (ARB, 2024).

2.3.2 Geology and Soils

Topography within the project site is relatively flat. There are no mapped Alquist-Priolo Earthquake Fault Zones that pass through or near the proposed project site. The nearest Alquist-Priolo Earthquake Fault Zones are the Claremont and San Jacinto Faults, located approximately 2.5 miles to the southwest of the proposed project. Southern California is historically a seismically active region.

2.3.3 Hydrology

The project site consists of a rectangular-shaped parcel encompassing approximately 37 acres of land. Surface topography is generally flat. The project is within FEMA Map 06071C8703J (09/02/2016). The site is entirely within Zone X, which is an area of minimal flood hazard (FEMA, 2016). A hydrology report will be conducted in the PEIR.

2.3.4 Biology

The project site is located in an urbanized area, which provides low habitat value for special-status plant and wildlife species. However, there are some areas of undeveloped habitat within the biological survey area (BSA) that could contain vegetation and soil conditions that could support special-status species. A biological report that includes a field survey and records search will be conducted in the PEIR.

2.3.5 Public Services

Fire protection services are provided to the project site by Redlands Fire Department. Police protection services are provided to the project site by Redlands Police Department. School services are provided by Redlands Unified School District (City of Redlands, 2017b, p. 3.13-9 to 3.13-14).

2.3.6 Utilities

Water supply to the city is provided by the City of Redlands and the Western Heights Water Company. Sewer service in the city is provided by the City of Redlands. Waste collection services are provided by the City of Redlands. Electricity is provided by Southern California Edison, and natural gas is provided by Southern California Gas Company (City of Redlands, 2017b, p. 3.14-1 to 3.14).

3.0 PROJECT DESCRIPTION

3.1 Project Location

The project site is part of an approximately 37-acre campus at 1301 California Street (APN 0167-441-07-000) within Concept Plan No. 1 of the East Valley Corridor Specific Plan. The site is currently developed with a 120,000 square foot building and parking for Kaiser Permanente Redlands Medical Offices on a portion of the site, with the remaining portion currently vacant. The campus is bounded by Almond Avenue on the north, California Street on the east and West Lugonia Avenue on the south; a trailer parking area associated with the Ashley Furniture Distribution Center is on the western boundary near the southwest corner of the campus property. Interstate 10 is approximately 0.25 mile to the south, and the runways of San Bernardino International Airport are approximately 1.4 miles to the northwest.

3.2 Project Background

The City of Redlands (City) is processing a request to implement a series of legislative and discretionary actions that would ultimately allow for the development of the balance of the site. The steps involve: (1) **Amendment No. 7 to Concept Plan 1**, which would amend the permitting procedure in Concept Plan No. 1, Section IV, Part A (Discretionary Actions); and (2) **Planned Development No. 6**, which is a comprehensive, detailed phasing plan for the future development of a medical campus, including a hospital. For the purposes of this analysis, based on the current submitted plans the project does not propose any immediate development, and does not request development permits.

The City's General Plan Land Use designation for the site is Commercial Industrial, and zoning designation for the site (under the East Valley Corridor Specific Plan) is Medical Facilities District under Concept Plan 1 (CP-1). The proposed project is an allowed use within these designations.

The City is the Lead Agency for the purposes of the California Environmental Quality Act (CEQA).

3.3 Project Overview

The project would consist of the two elements as follows: (1) Amendment No. 7 to Concept Plan 1; and (2) Planned Development No. 6.

Amendment No. 7 to Concept Plan 1 would add a 'Development Plan' procedure concerning the review and approval of large-scale, mixed use or multi-phased developments.

Planned Development No. 6 is a proposed Development Plan including the following improvements:

- Ambulatory Services Center/Medical Office Building No. 2 (Phase 1);
- Hospital with associated support buildings, including central utility plant and parking structure (Phase 2);
- Medical Office Building No. 3 (Phase 3);
- Expansion of Hospital (Phase 4).

Planned Development No. 6 is limited to approval of a master/site phasing plan, and no immediate development is proposed. Project construction timing is indeterminate.

3.4 Proposed Project Features

3.4.1 New Buildings

The proposed project will be implemented in four phases which are assumed to be developed at roughly eight-year intervals, although the actual construction of each phase would occur over an indeterminate amount of time. **Table 3.4-1** summarizes the proposed key project features in each phase of development.

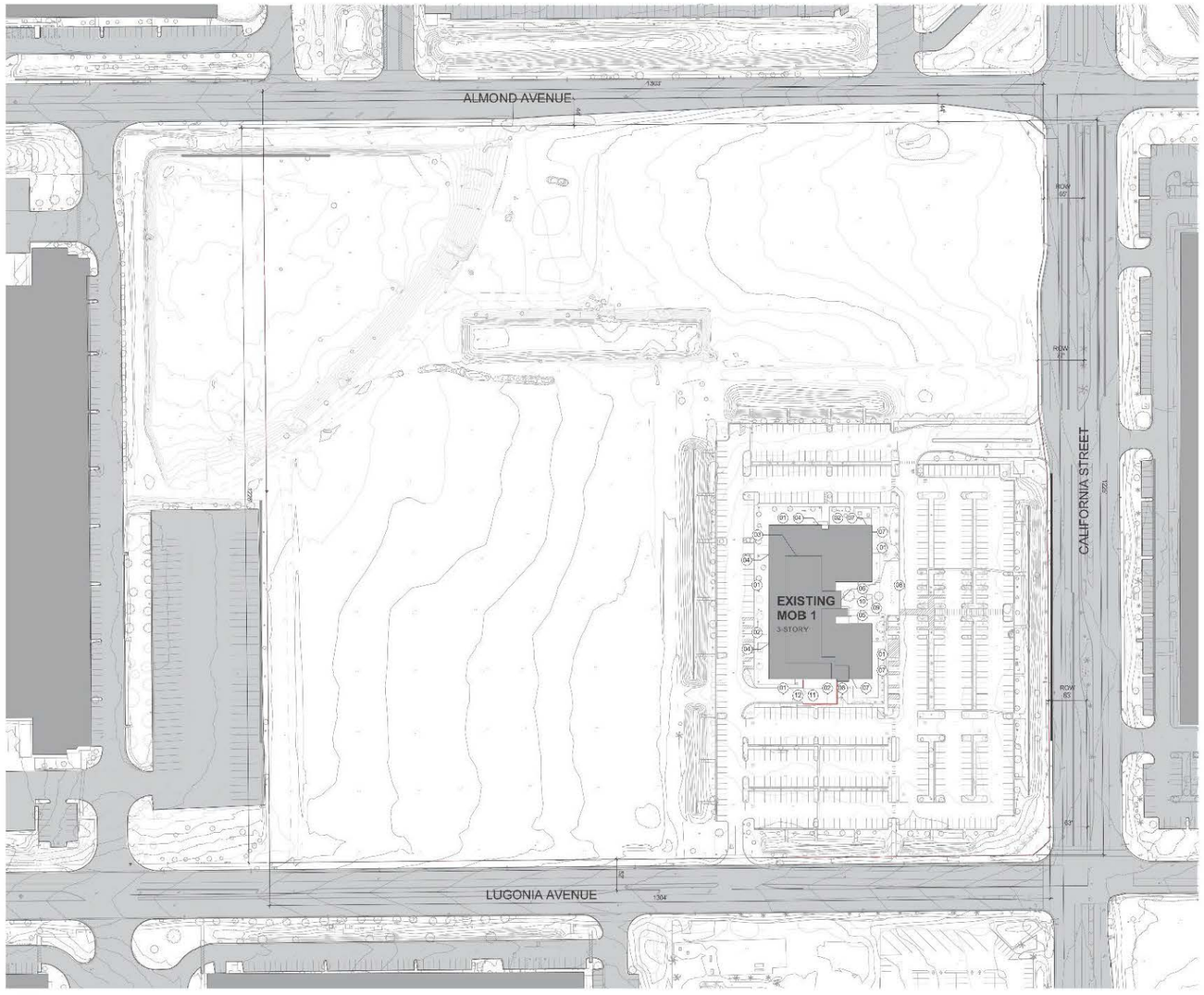
Table 3.4-1
PROJECT SUMMARY

Phase	Description	Purpose	Building Sq. Ft.	Footprint Sq. Ft.	Building Height to Roof	Levels	Rooftop Equipment Screen
Existing	MOB 1	Medical Office	120.000	40,000	Existing	3	6'-6"
1	ASC/MOB 2	Ambulatory Surgery/ Medical Office	165,000	36,000	62'	4	8'-1"
2[1]	Hospital	213 Bed Acute Care Hospital	400,000	122,000	107'	7+base-ment	15'0"
	Central Utilities	Mechanical & Electrical Utilities	35,000	15,000	18'	2+base-ment	-
3	MOB 3	Medical Office	83,000	20,000	62'	4	7'-6"
4	Hospital Addition	108 Bed Hospital Addition	180,000	30,000	77'	5+base-ment	15'-0"
Total at Buildout	-	-	**983,000**	263,000	-	-	-

[1] Phase 2 would include construction of a 464,000-square-foot, seven-story parking structure housing 1,218 parking spaces. The parking structure is omitted from the table above so the square footage will not be added to that of buildings for human occupancy.
Source: Masterplan Development plan Submittal, September 17, 2024

Figure 3.3-1 is the existing site plan depicting the current state of the development, while **Figures 3.3-2** through **3.3-5** show the layout of the campus at the end of each of the four planned phases of new development. **Figures 3.3-6** through **3.3-9** show floor plans of the building in Phase 1, while **Figures 3.3-10** through **3.3-15** show elevations of buildings in all phases. A complete set of project plans, as contained in the Masterplan Development Plan Submittal dated September 17, 2024, can be found in **Appendix A**.

Figure 3.3-1
EXISTING SITE PLAN



EXISTING MOB 1 MATERIAL NOTES:

01 PAINTED PLASTER (45'-0")
02 PAINTED PLASTER (47'-0")
03 SCREEN WALL WITH METAL SIDING (7'-0")
04 SLATE TILE WALL SYSTEM (12'-5.5")
05 STOREFRONT / CURTAINWALL SYSTEM (44'-4")
06 METAL PANEL (54'-0")
07 METAL PANEL (8'-0")
08 CONCRETE BOLLARDS (24")
09 FREESTANDING COURT WALL (12'-6")
10 CAST IN PLACE CONCRETE SEATWALL (18")
11 CMU BLOCK WALL (10'-0")
12 IRON GATE (8'-0")

Not to Scale

Disclaimer: Illustration provided by CO Architects, who has indicated that the information is true and correct. No other warranties are expressed or implied.

Source: CO Architects, July 24, 2024.

Kaiser Permanente
Redlands Medical Center
Existing Site Plan

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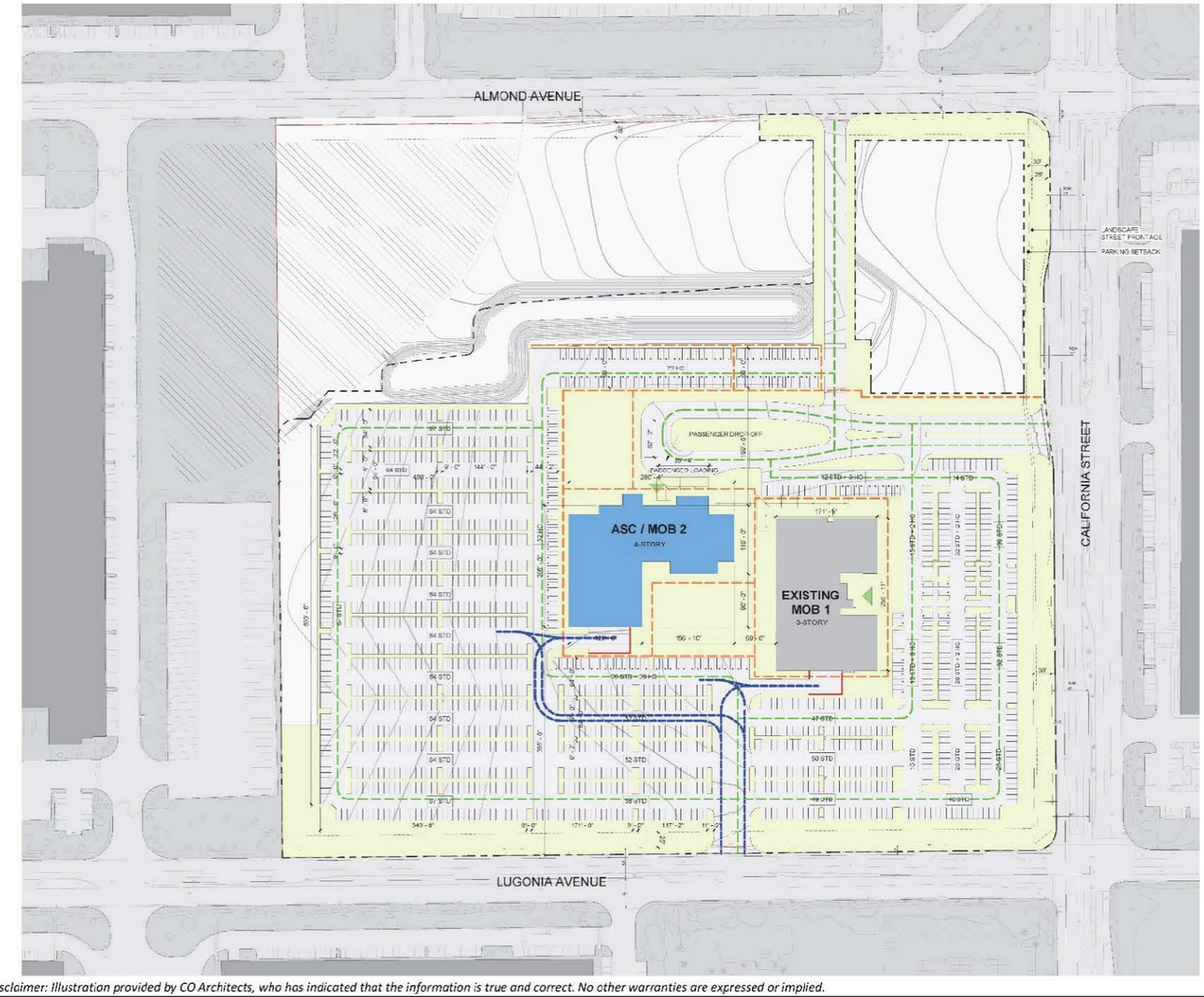
Figure 3.3-2
PHASE 1 SITE PLAN



CIRCULATION LEGEND

- AMBULANCE ROUTE
- VEHICLE ACCESS
- SERVICE ROUTE
- PEDESTRIAN PATH

PHASING LEGEND

- COMPLETE/PROPOSED
- EXISTING

SITE PLAN LEGEND

- DEVELOPED SITE AREA
- LANDSCAPED AREA
- SURFACE PARKING
- PERIMETER WALL

PHASE 1

BUILDING DESCRIPTION:	AREA:
Existing MOB 1	120,000 SF
ASC/MOB 2	165,000 SF
Total Building Area	285,000 SF

Not to Scale

Disclaimer: Illustration provided by CO Architects, who has indicated that the information is true and correct. No other warranties are expressed or implied.

Source: CO Architects, July 24, 2024.

Kaiser Permanente
Redlands Medical Center

Phase 1 Site Plan

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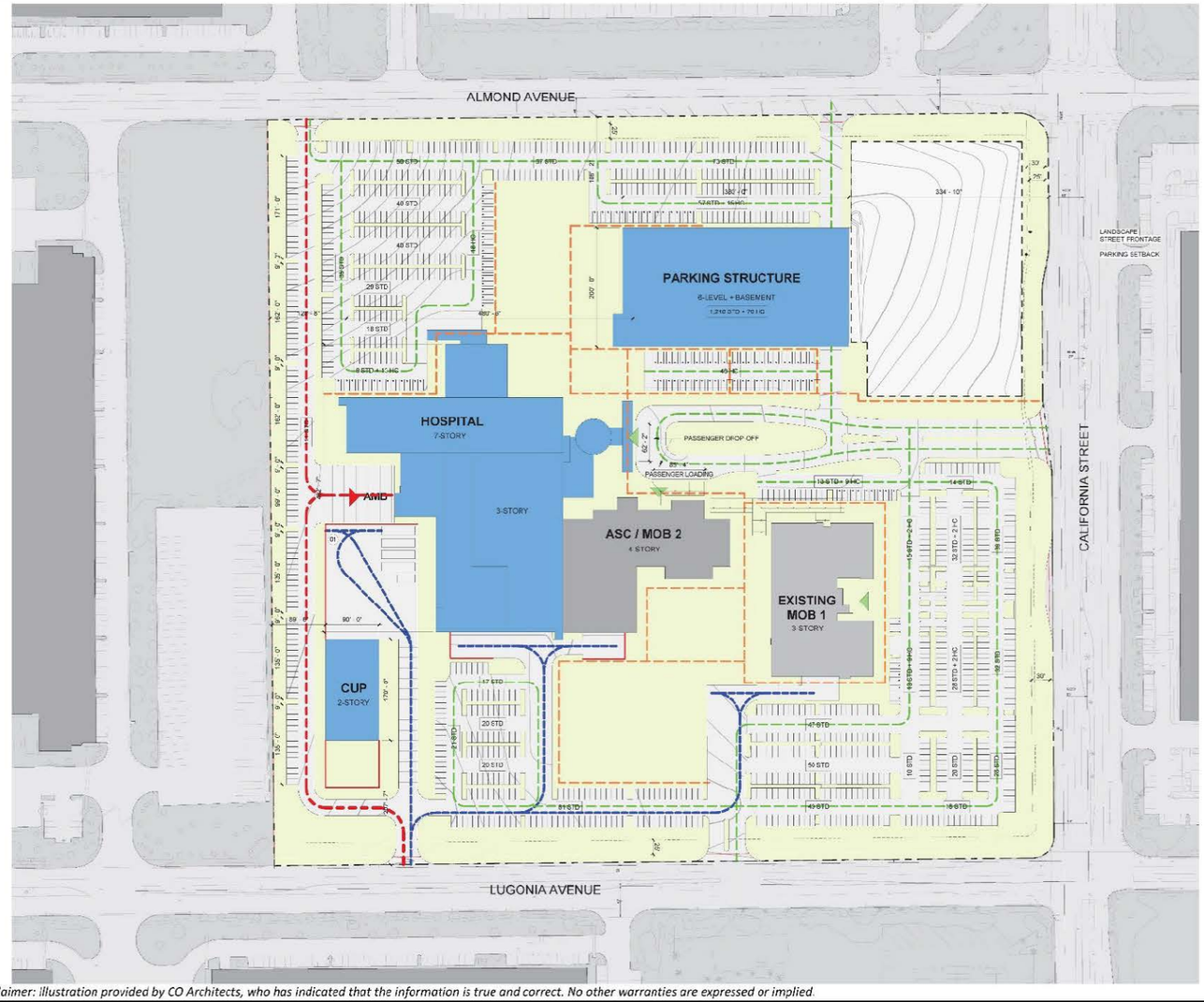
Figure 3.3-3
PHASE 2 SITE PLAN



MATERIAL NOTES:

(01) CMU (6'-0")

CIRCULATION LEGEND

- AMBULANCE ROUTE
- VEHICLE ACCESS
- SERVICE ROUTE
- PEDESTRIAN PATH

PHASING LEGEND

- COMPLETE/PROPOSED
- EXISTING

SITE PLAN LEGEND

- DEVELOPED SITE AREA
- LANDSCAPED AREA
- SURFACE PARKING
- PERIMETER WALL

PHASE 2

BUILDING DESCRIPTION:	AREA:
Existing MOB 1	120,000 SF
ASC/MOB 2	165,000 SF
Hospital	400,000 SF
Central Utility Plant	35,000 SF
Total Building Area	720,000 SF

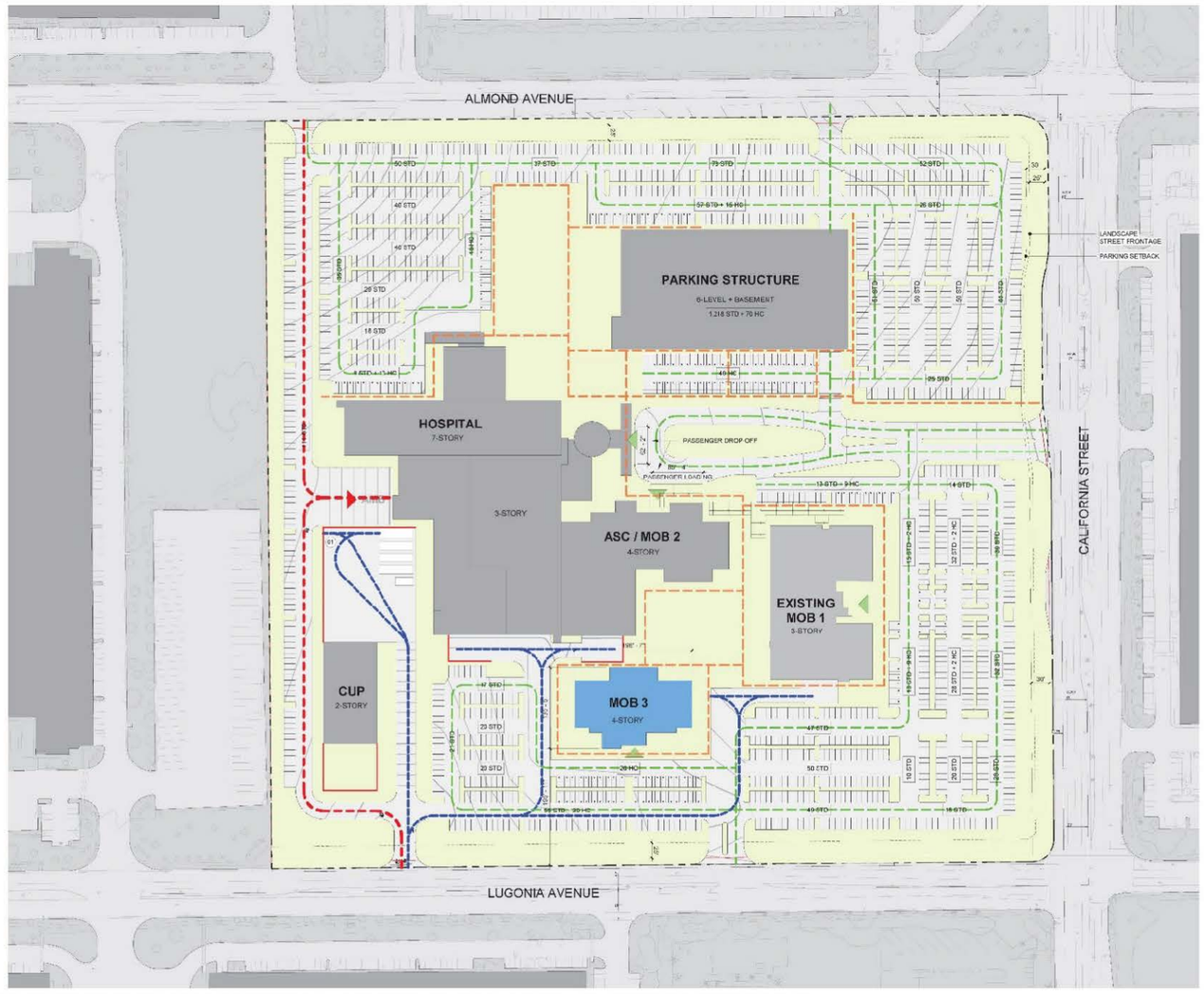
Not to Scale

Disclaimer: Illustration provided by CO Architects, who has indicated that the information is true and correct. No other warranties are expressed or implied.

Source: CO Architects, July 24, 2024

Kaiser Permanente
Redlands Medical Center
Phase 2 Site Plan

Figure 3.3-4
PHASE 3 SITE PLAN



MATERIAL NOTES:

(01) CMU (6'-0")

CIRCULATION LEGEND

- AMBULANCE ROUTE
- VEHICLE ACCESS
- SERVICE ROUTE
- PEDESTRIAN PATH

PHASING LEGEND

- COMPLETE/PROPOSED
- EXISTING

SITE PLAN LEGEND

- DEVELOPED SITE AREA
- LANDSCAPED AREA
- SURFACE PARKING
- PERIMETER WALL

PHASE 3

BUILDING DESCRIPTION:	AREA:
Existing MOB 1	120,000 SF
ASC/MOB 2	165,000 SF
Hospital	400,000 SF
Central Utility Plant	35,000 SF
MOB 3	83,000 SF
Total Building Area	803,000 SF

Not to Scale

Disclaimer: Illustration provided by CO Architects, who has indicated that the information is true and correct. No other warranties are expressed or implied.

Source: CO Architects, July 24, 2024.

Kaiser Permanente
Redlands Medical Center

Phase 3 Site Plan

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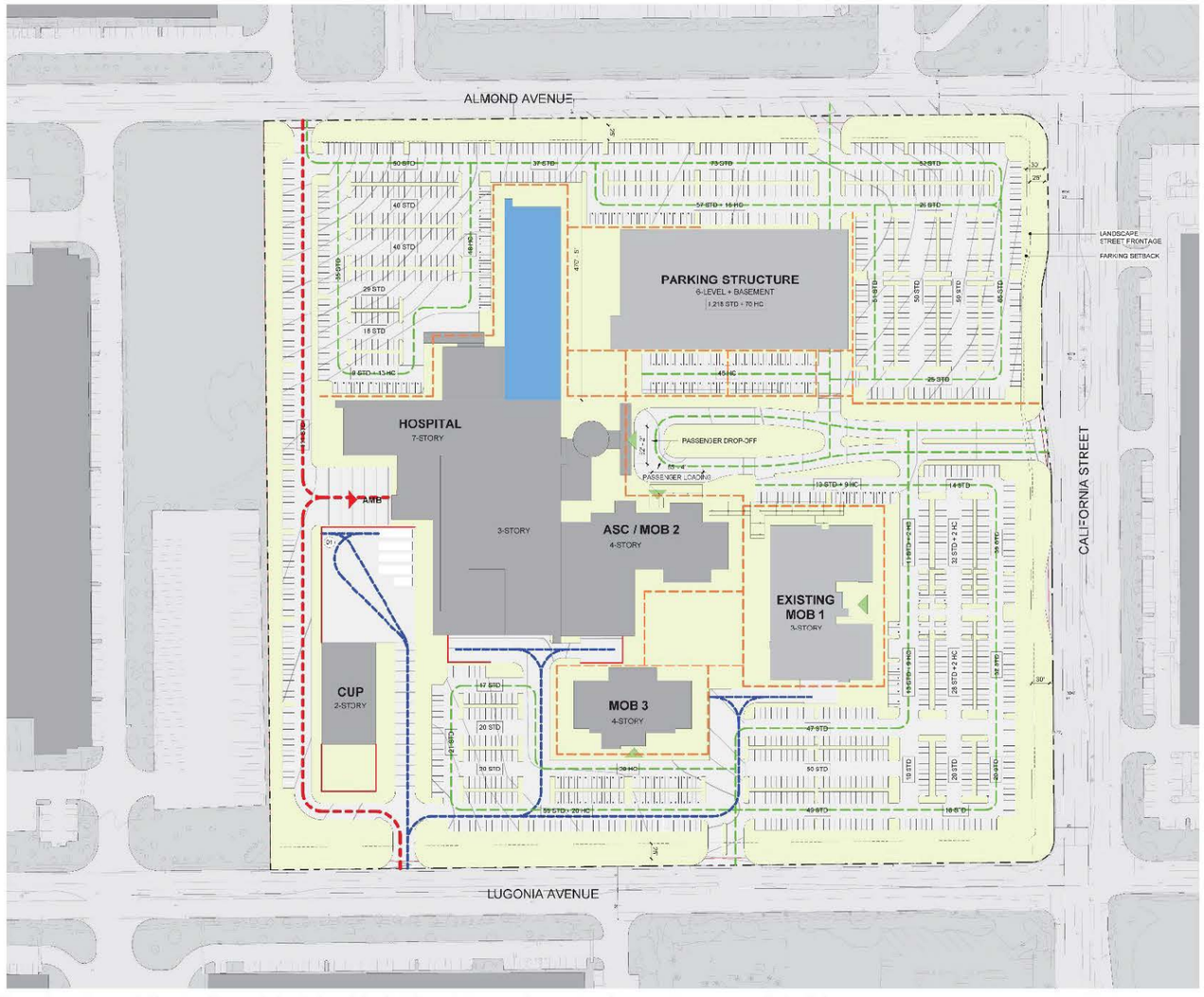
Figure 3.3-5
PHASE 4 SITE PLAN



MATERIAL NOTES:

(01) CMU (6'-0")

CIRCULATION LEGEND

- AMBULANCE ROUTE
- VEHICLE ACCESS
- SERVICE ROUTE
- PEDESTRIAN PATH

PHASING LEGEND

- COMPLETE/PROPOSED
- EXISTING

SITE PLAN LEGEND

- DEVELOPED SITE AREA
- LANDSCAPED AREA
- SURFACE PARKING
- PERIMETER WALL

PHASE 4

BUILDING DESCRIPTION:	AREA:
Existing MOB 1	120,000 SF
ASC/MOB 2	165,000 SF
Hospital	400,000 SF
Central Utility Plant	35,000 SF
MOB 3	83,000 SF
Hospital Addition	180,000 SF
Total Building Area	983,000 SF

Not to Scale

Disclaimer: Illustration provided by CO Architects, who has indicated that the information is true and correct. No other warranties are expressed or implied.

Source: CO Architects, July 24, 2024.

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Redlands Medical Center

Phase 4 Site Plan

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Figure 3.3-6
ASC/MOB 2 LEVEL 1 FLOOR PLAN (PHASE 1)

Source: CO Architects, July 24, 2024.

Kaiser Permanente
Redlands Medical Center
ASC/MOB 2 Level 1 Floor Plan

Figure 3.3-7
ASC/MOB 2 LEVEL 2 FLOOR PLAN (PHASE 1)

Disclaimer: Illustration provided by CO Architects, who has indicated that the information is true and correct. No other warranties are expressed or implied.

Source: CO Architects, July 24, 2024.

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Redlands Medical Center

ASC/MOB 2 Level 2 Floor Plan

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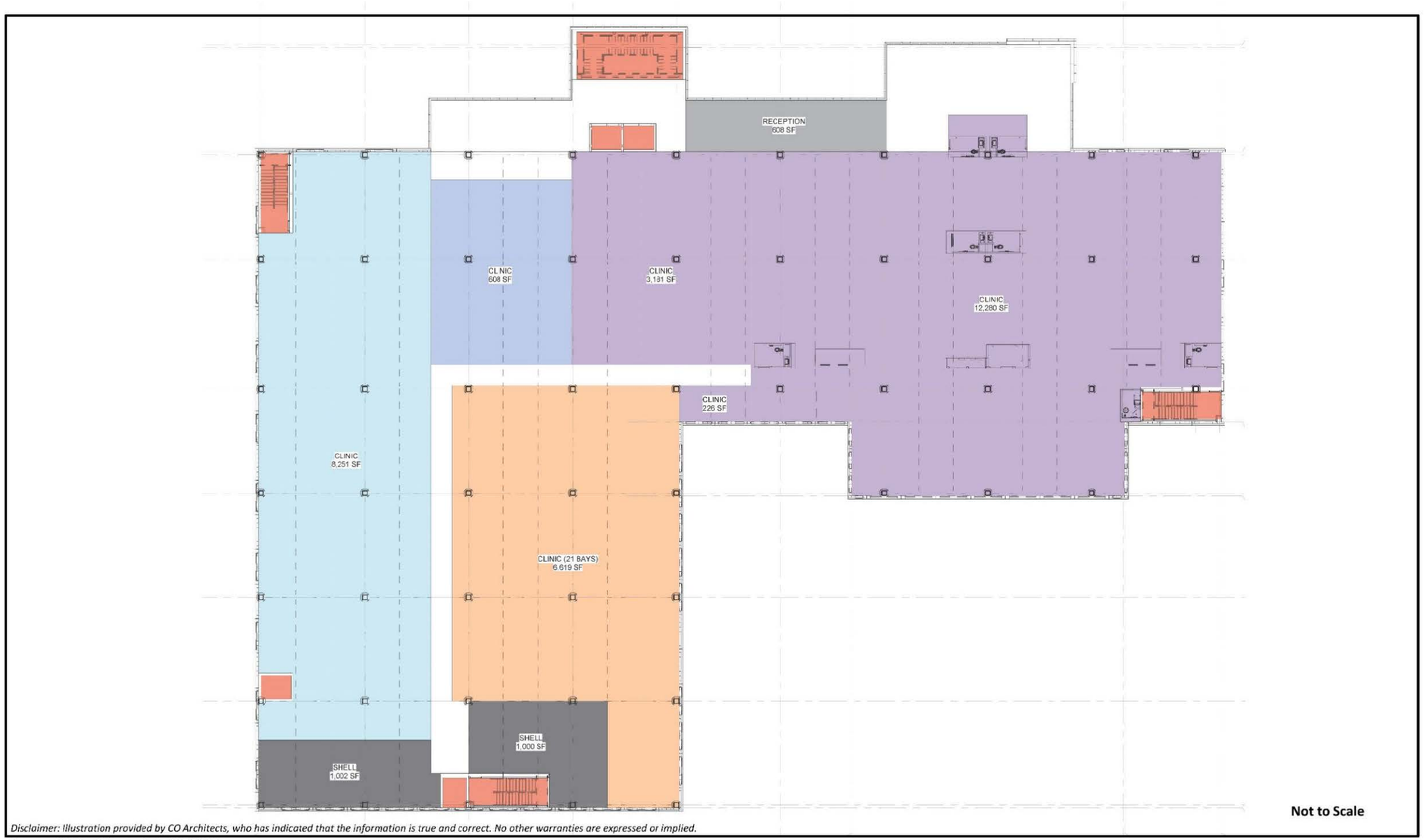
Figure 3.3-8
ASC/MOB 2 LEVEL 3 FLOOR PLAN (PHASE 1)



Disclaimer: Illustration provided by CO Architects, who has indicated that the information is true and correct. No other warranties are expressed or implied.

Source: CO Architects, July 24, 2024.

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ASC/MOB 2 Level 3 Floor Plan

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Figure 3.3-9
ASC/MOB 2 LEVEL 4 FLOOR PLAN (PHASE 1)

Disclaimer: Illustration provided by CO Architects, who has indicated that the information is true and correct. No other warranties are expressed or implied.

Source: CO Architects, July 24, 2024.

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Redlands Medical Center

ASC/MOB 2 Level 4 Floor Plan

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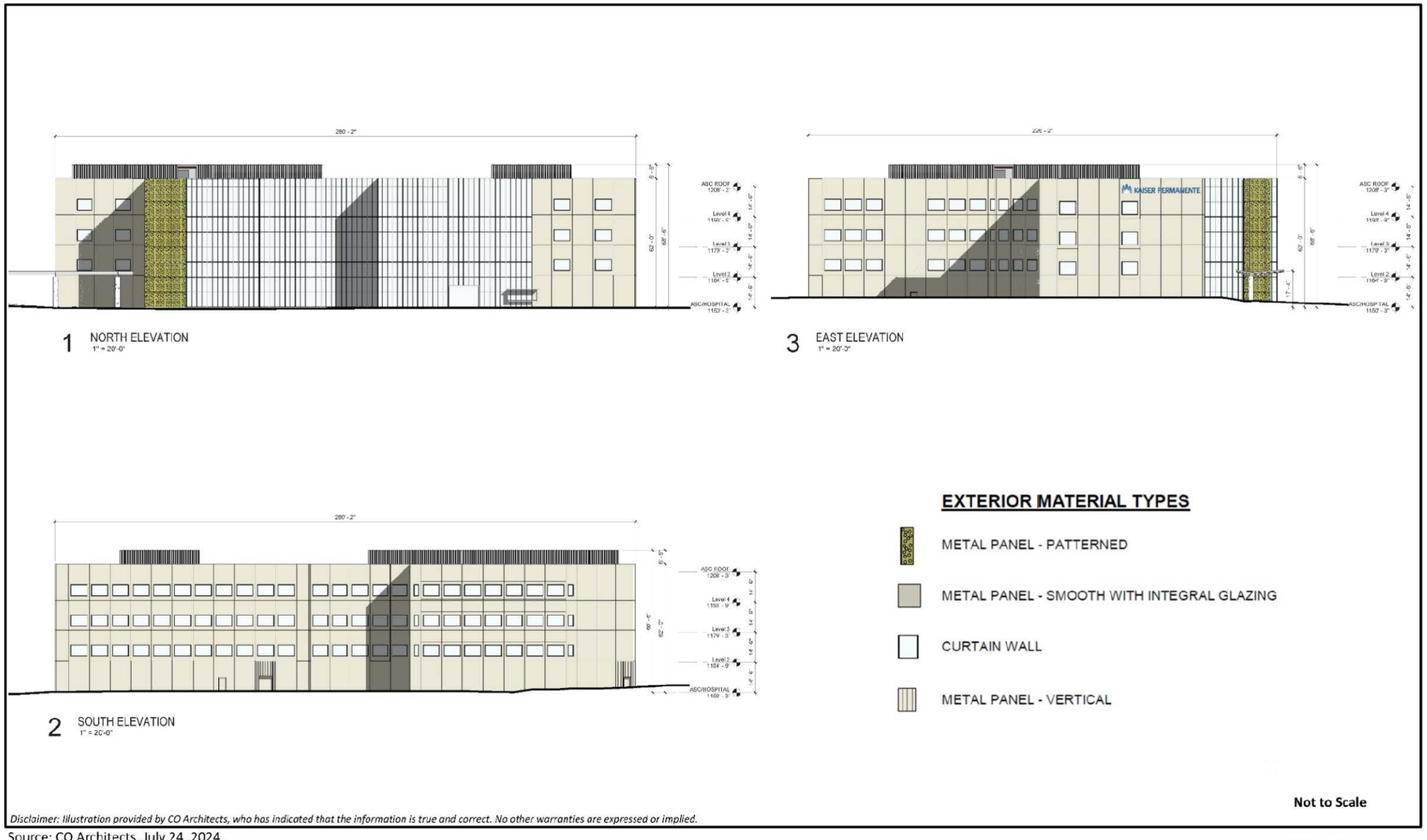
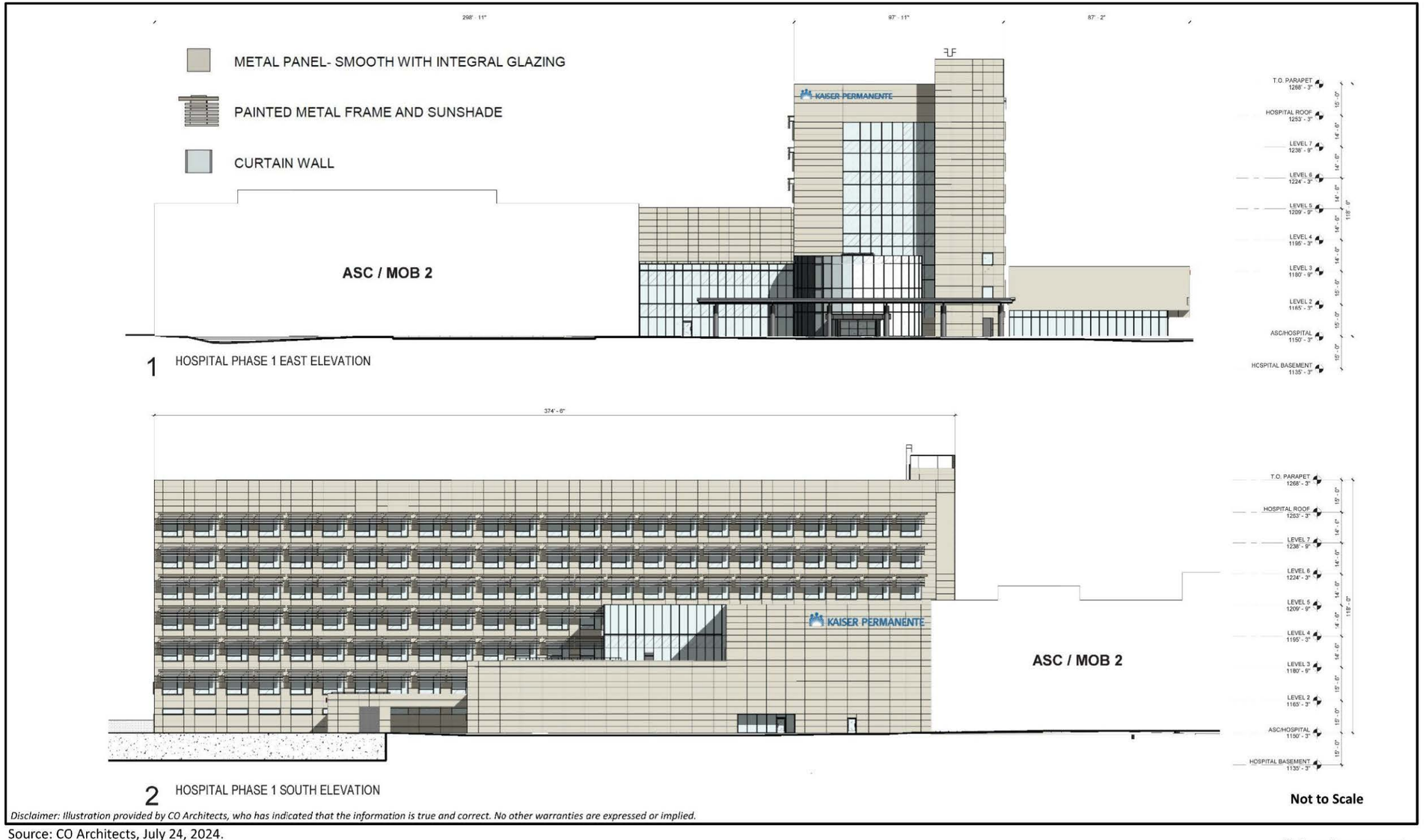
Figure 3.3-10
ASC/MOB 2 ELEVATIONS



Source: CO Architects, July 24, 2024.

Kaiser Permanente
Redlands Medical Center
ASC/MOB 2 Elevations

Figure 3.3-11
HOSPITAL PHASE 2 ELEVATIONS (1 OF 2)



Disclaimer: Illustration provided by CO Architects, who has indicated that the information is true and correct. No other warranties are expressed or implied.

Source: CO Architects, July 24, 2024.

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Redlands Medical Center
Hospital Phase 2 Elevations (1 of 2)

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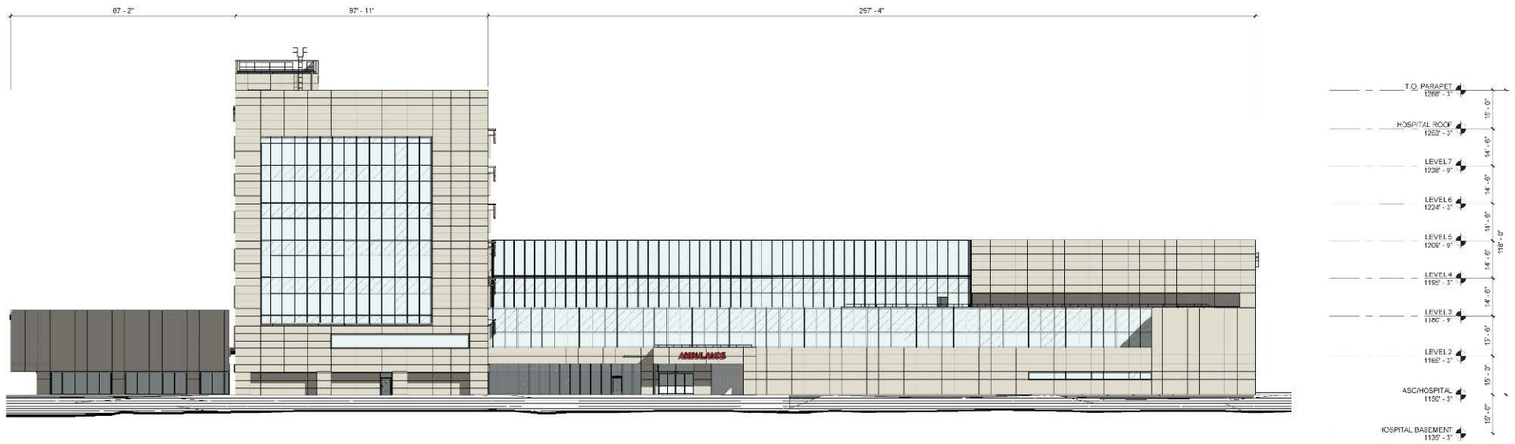
Figure 3.3-12
HOSPITAL PHASE 2 ELEVATIONS (2 OF 2)



Disclaimer: Illustration provided by CO Architects, who has indicated that the information is true and correct. No other warranties are expressed or implied.

Source: CO Architects, July 24, 2024.

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Hospital Phase 2 Elevations (2 of 2)

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Figure 3.3-13
PARKING STRUCTURE ELEVATIONS

Source: CO Architects, July 24, 2024.

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Parking Structure Elevations

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Figure 3.3-14
MOB 3 ELEVATIONS

Source: CO Architects, July 24, 2024.

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Mob 3 Elevations

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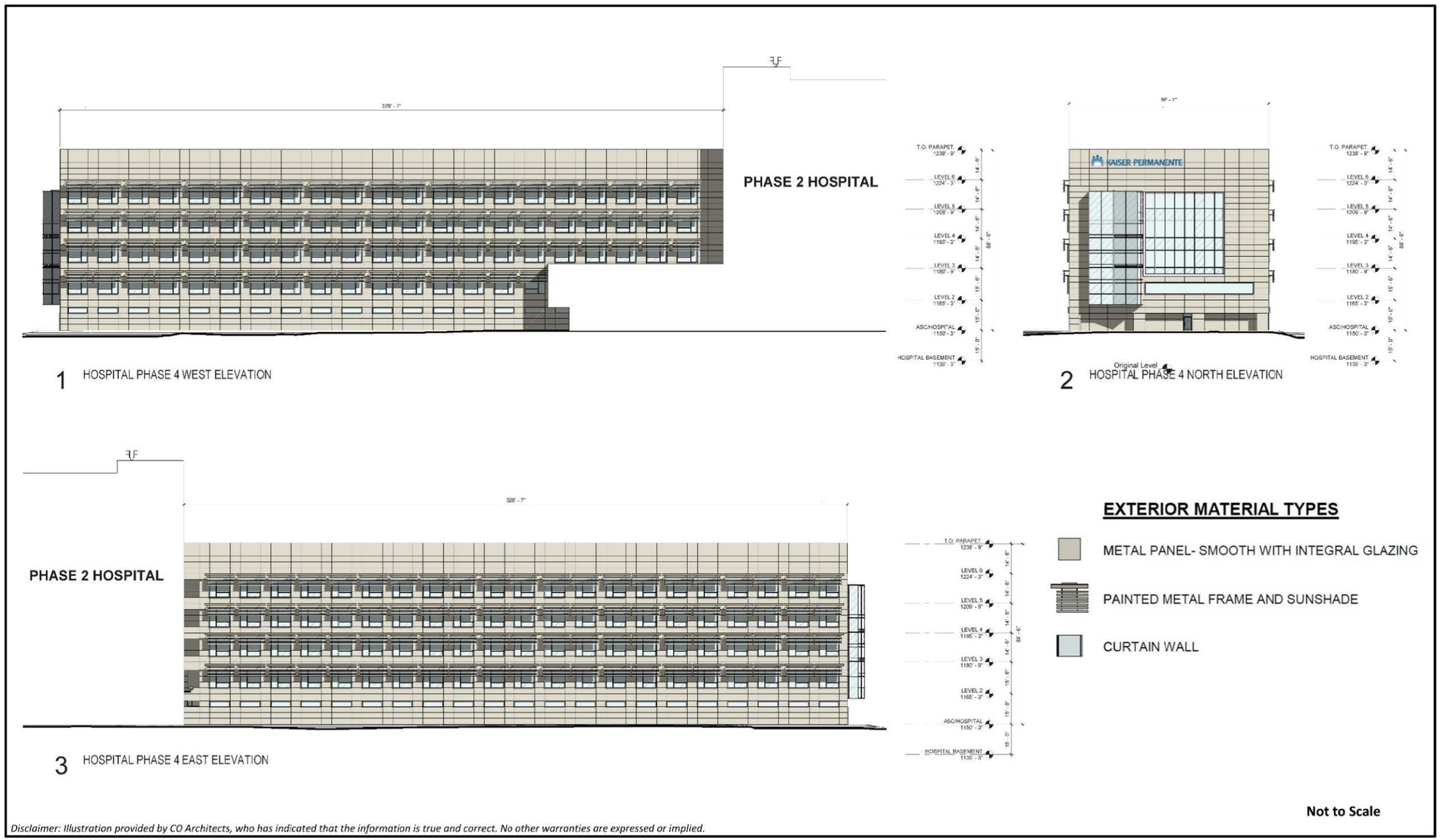
Figure 3.3-15
HOSPITAL PHASE 4 ELEVATIONS



Disclaimer: Illustration provided by CO Architects, who has indicated that the information is true and correct. No other warranties are expressed or implied.

Source: CO Architects, July 24, 2024.

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Hospital Phase 4 Elevations

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3.4.2 Access, Circulation, and Parking

Primary site ingress and egress through all phases of the project, including the existing medical office building, is via a single driveway off California Street; the driveway will be expanded to approximately 60 feet wide starting with Phase 1, including a single inbound lane and a single outbound lane, separated by a median. Additional access will be from Lugonia Avenue (approximately 50 feet wide, with a median) and Almond Avenue (approximately 30 feet wide, with no median). Passenger loading and dropoff for Phase 1 (the ASC/MOB 2 building) will be at the southwest edge of an elongated traffic oval entered via the California Street entrance.

Under the City's parking requirements, the full development of four phases would require 2,711 parking spaces; the proposed project will provide 2,803 spaces (including 226 ADA spaces) upon completion of Phase 4. Phase 2 would include construction of a 1,218-space parking structure and demolition of eight acres of surface parking.

Table 3.4-2 shows specific requirements and parking provided for each phase.

Table 3.4-2
PARKING SUMMARY

Land Use	Parking Requirement	Square feet/beds	Parking Required	Parking Provided	ADA Spaces (included in total)
Existing MOB 1	5 per 1,000 sf	120,000 sf	600	600	60
ASC/MOB 2	5 per 1,000 sf	165,000 sf	825	825	83
Hospital (Phase 2)	1 per bed/1 per peak staff	213 beds / 501 staff	714	714	16
Central Utility Plant (Phase 2)	NA	NA	NA	NA	NA
Phase 2 Completion	-	-	-	*2,139 spaces: 1,218 in parking structure and 921 surface parking*	*157*
MOB 3 (Phase 3)	5 per 1,000 sf	83,000 sf	415	415	42
Hospital Addition (Phase 4)	1 per bed/1 per peak staff	108 beds/ 49 staff	157	157	4
Excess	-	-	-	92	21
TOTALS	**=**	**=**	**2,711**	**2,803[1]**	**226**

[1] Parking provided at completion consists of 1,218 spaces in a parking structure (to be built in Phase 2) plus 1,585 surface parking spaces.
Source: Masterplan Development Plan Submittal, September 17, 2024

3.4.3 Landscaping

Existing landscaping onsite, in the surface parking lot surrounding the existing building, includes 148 trees, with 24 evergreen trees (16 percent of trees) and 124 deciduous trees (84 percent). When the four planned phases are complete, there will be 1,037 trees, of which 710 (68 percent) will be evergreen and 327 (32 percent) will be deciduous.

Landscaping will be provided in each phase of the planned four-phase development. Table 3.4-3 below shows the area of landscaping, both in square feet and as a percentage of the total developed area, in each of the four phases.

Table 3.4-3
LANDSCAPING

Phase	Landscaping, square feet/acres	Parking Lot Landscaping	Total Landscaping	Total Developed Site Area, acres	Total Landscaping, as percent of total development footprint
Phase 1	411,000/9.44	85,000/1.95	496,000/11.39	27.4	41.5%
Phase 2	602,000/13.82	85,000/1.95	687,000/15.77	34.7	45.4%
Phase 3	593,000/13.61	102,000/2.34	695,000/15.96	37.5	42.6%
Phase 4	563,000/12.92	102,000/2.34	665,000/15.27	37.5	40.7%

[1] **Source**: CO Architects 2024

Figure 3.4-1 shows the landscaping plan for the fully developed project (four phases). The full project landscaping palette is shown in **Figure 3.4-2**.

3.4.4 Exterior Lighting

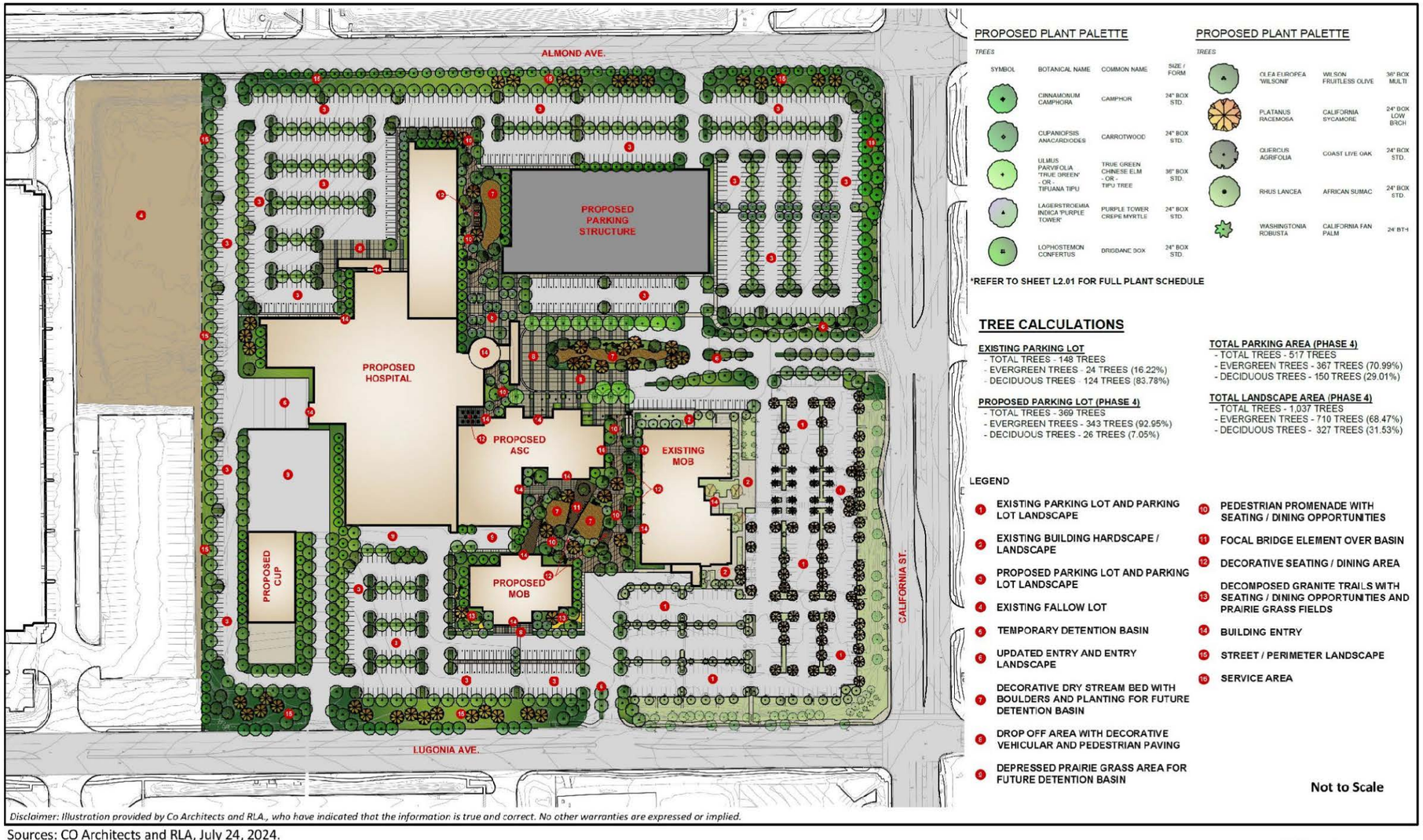
The proposed project includes area lighting throughout the project site. Lighting for the project would comply with the requirements of the East Valley Corridor Specific Plan. Specifically, the project will provide for the following lighting requirements:

- Security lighting shall be shielded, and exterior wall-mounted flood lights are prohibited.
- All light fixtures shall be concealed source fixtures.
- Pedestrian walkway fixtures / poles shall be 12-foot-high maximum.
- Parking lot fixtures / poles shall be 30-foot-high maximum.

Outdoor lighting would be provided during construction for safety and security purposes. Construction would occur during daylight and during regular business hours.

- Pedestrian walkways and plazas, building entries, driveway entries, drop-offs and stairways and grade changes shall be lighted.
- Parking and driveway lighting shall provide 0.5 foot-candle minimum uniform lighting (City of Redlands, 2017c, p. D4-55).

Figure 3.4-1
PRELIMINARY LANDSCAPE PLAN PHASE 4



Sources: CO Architects and RLA, July 24, 2024.

Kaiser Permanente
Redlands Medical Center

Preliminary Landscape Plan Phase 4

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Figure 3.4-2
LANDSCAPE PALETTE

PROPOSED PLANT PALETTE

TREES

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE / FORM	INSTALL SIZE	WATER USE	DESCRIPTION	MATURE SIZE (AT 15 YEARS)
+	CINNAMONUM CAMPHORA	CAMPHOR	24" BOX STD.	8'H X 4'W X 1-1/4"CAL.	M	CALIFORNIA STREET TREE	22'H X 20'W X 4"CAL.
✥	CUPANIOPSIS ANACARDIODES	CARROTWOOD	24" BOX STD.	6'H X 3'W X 1-1/4"CAL.	M	LUGONIA STREET TREE	24'H X 20'W X 4"CAL.
+	ULMUS PARVIFOLIA 'TRUE GREEN' - OR - TIPULANA TIPU	TRUE GREEN CHINESE ELM - OR - TIPU TREE	36" BOX STD.	10'H X 5'W X 2"CAL.	M	CANOPY SHADE TREE	25'H X 25'W X 4"CAL.
▲	LAGERSTROEMIA INDICA 'PURPLE TOWER'	PURPLE TOWER CREPE MYRTLE	24" BOX STD.	6'H X 3'W X 1-1/4"CAL.	L	SMALL DECIDUOUS ACCENT	14'H X 12'W X 3"CAL.
#	LOPHOSTEMON CONFERTUS	BRISBANE BOX	24" BOX STD.	8'H X 3'W X 1-1/4"CAL.	M	PERIMETER EDGE	25'H X 10'W X 4"CAL.
♣	OLEA EUROPEA 'WILSONII	WILSON FRUITLESS OLIVE	36" BOX MULTI	8'H X 5'W X (3) 1.5"CAL.	VL	EVERGREEN MULTI TRUNK FOCAL TREE	20'H X 24'W X (3) 3"CAL.
✱	PLATANUS RACEMOSA	CALIFORNIA SYCAMORE	24" BOX LOW BRCH	8'H X 3'W X 1-1/4"CAL.	M	CONIFEROUS SCREEN	25'H X 18'W X 4"CAL.
•	QUERCUS AGRIFOLIA	COAST LIVE OAK	24" BOX STD.	6'H X 3'W X 1-1/4"CAL.	L	EVERGREEN CANOPY	24'H X 20'W X 4"CAL.
◉	RHUS LANCEA	AFRICAN SUMAC	24" BOX STD.	6'H X 3'W X 1-1/4"CAL.	L	PARKING AREA SHADE CANOPY	20'H X 24'W X 4"CAL.
★	WASHINGTONIA ROBUSTA	CALIFORNIA FAN PALM	24' BTH	24'H X 8'W X 18" CAL.	L	CALIFORNIA STREET SKYLINE PALM	35'H X 8'W X 30"CAL.

BACKGROUND SHRUBS

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	SPACING	WATER USE	DESCRIPTION
	FURCRAEA MACDOUGALLII	MACDOUGALLS CENTURY PLANT	5 GAL.	60" O.C.	L	SUCCULENT ACCENT
	OLEA X MONTRA 'LITTLE OLLIE'	LITTLE OLLIE	5 GAL.	36" O.C.	L	HEDGE
	LELCOPHYLLUM F. 'GREEN CLOUD'	TEXAS RANGER	5 GAL.	48" O.C.	L	LARGE FLOWERING
	WESTRINGIA FRUTICOSA 'WYNYABBIE GEM'	WYNYABBIE GEM COAST ROSEMARY	5 GAL.	42" O.C.	L	HEDGE

MIDGROUND SHRUBS

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	SPACING	WATER USE	DESCRIPTION
	AGAVE OVATIFOLIA	WHALE'S TONGUE AGAVE	5 GAL.	48" O.C.	L	SUCCULENT ACCENT
	MUHLENBERGIA EMERSLEYI 'EL TORO'	BULL GRASS	1 GAL.	36" O.C.	L	ORNAMENTAL GRASS
	RHAPHIOLEPIS UMBELLATA 'MINOR'	DWARF YEDDO HAWTHORN	5 GAL.	36" O.C.	VL	FLOWERING ACCENT
	CALLISTEMON 'LITTLE JOHN'	LITTLE JOHN DWARF BOTTLE BRUSH	5 GAL.	36" O.C.	L	FLOWERING ACCENT
	BACCHARIS PILULARIS 'TWIN PEAKS'	TWIN PEAKS COYOTE BRUSH	5 GAL.	36" O.C.	L	CALIFORNIA NATIVE

FOREGROUND SHRUBS

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	SPACING	WATER USE	DESCRIPTION
	DIANELLA 'LITTLE REV'	LITTLE REV FLAX LILY	1 GAL.	24" O.C.	L	STRAPPY ACCENT
	CAREX DIVULSA	BERKELEY SEDGE	1 GAL.	30" O.C.	L	ORNAMENTAL GRASS
	FESTUCA MAIREI	ATLAS FESCUE	1 GAL.	30" O.C.	L	ORNAMENTAL GRASS
	HESPERALOE FARVIFLORA	RED YUCCA	1 GAL.	36" O.C.	L	FLOWERING ACCENT
	LOMANDRA LONGIFOLIA 'LOMLON'	LOMLON MOOR GRASS	1 GAL.	36" O.C.	VI	ORNAMENTAL GRASS

GROUNDCOVERS

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	SPACING	WATER USE	DESCRIPTION
	ACACIA REDOLENS 'LOW BOY'	PROSTRATE ACACIA	1 GAL.	6' O.C.	VL	EVERGREEN GROUNDCOVER
	BACCHARIS P. 'PIGEON POINT'	DWARF COYOTE BRUSH	1 GAL.	48" O.C.	L	EVERGREEN GROUNDCOVER
	LANTANA 'NEW GOLD'	NEW GOLD LANTANA	1 GAL.	36" O.C.	L	FLOWERING GROUNDCOVER
	SESLERIA AUTUMNALIS 'GREENLEE'	GREENLEE MOOR GRASS	1 GAL.	18" O.C.	VI	FLOWERING GROUNDCOVER
	ROSMARINUS O. 'PROSTRATUS'	PROSTRATE ROSEMARY	FLATS	12" O.C.	L	EVERGREEN GROUNDCOVER

BIOSWALE GRASSES

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	SPACING	WATER USE	DESCRIPTION
	CAREX DIVULSA	BERKELEY SEDGE	1 GAL.	24" O.C.	L	BIOSWALE GRASS
	CHONDROPETALUM TECTORUM	CAPE RUSH	5 GAL.	36" O.C.	VI	BIOSWALE GRASS
	JUNCUS PATENS	CALIFORNIA GRAY RUSH	1 GAL.	18" O.C.	L	BIOSWALE GRASS

VINES

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	SPACING	WATER USE	DESCRIPTION
	DISTICTUS BUCCINATORIA	BLOOD-RED TRUMPET VINE	1 GAL. / STAKED	PER PLAN	VI	FLOWERING VINE

WATER USE KEY:
VL = VERY LOW WATER USE. L = LOW WATER USE. M = MODERATE WATER USE, H = HIGH WATER USE. WATER USE STATED IS PER 'WATER USE CLASSIFICATION OF LANDSCAPE SPECIES' (ALSO REFERRED TO AS WUCOLS IV; FOR THE CITY OF REDLANDS

Disclaimer: Illustration provided by Co Architects and RLA., who have indicated that the information is true and correct. No other warranties are expressed or implied.

Sources: CO Architects and RLA, July 24, 2024.

Kaiser Permanente
Redlands Medical Center
Landscape Palette

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3.4.5 Utilities

The project includes a 2-story Central Utility Plant (CUP) in Phase 2. The building footprint is approximately 15,300 square feet, with 35,000 square feet of floor area and a height of 18 feet. The CUP will provide heating hot water and chilled water for space thermal control, domestic hot water, and normal and emergency power. The power/fuel source will be determined in accord with Kaiser Permanente's commitment to carbon neutral operations but will likely be an all-electric micro-grid with onsite generation combined with a public utility source (Wong, 2024).

Proposed utility connections are listed below in Table 3.4-1 and are shown in the project utilities plans included in the Development Plan Submittal dated July 24, 2024, included as **Appendix A**.

Table 3.4-1
PROPOSED UTILITIES CONNECTIONS

Utility	Phase 1	Phase 2	Phase 3	Phase 4
Water	**Offsite:** Connection to existing water main in Lugonia Avenue	**Offsite:** Water connection to main in Lugonia Ave.	Connection to onsite water main	Connection to onsite water main
Fire Water	Connection to onsite water main	**Offsite:** Connections to existing mains in California Street and Lugonia Avenue	Connection to onsite water main	Connection to onsite water main
Sewer	Connection to onsite sewer main	**Offsite:** Sewer connections in Lugonia Ave. and Almond Ave.	Connection to onsite sewer main	Connection to onsite sewer main
Storm Drainage	**Offsite:** Storm drain connecting to storm drain in Lugonia Ave	Proposed storm drains within project site	Proposed storm drains within project site	Proposed storm drains within project site

Source: CO Architects, 2024

3.4.6 General Development Provisions

The following general provisions will apply to development of the project:

- Employee vanpool and rideshare parking spaces shall be designated near employee building entrances at a rate of 1 per 100 spaces or at a rate of 10 per 100 employees, whichever is greater.
- Bicycle racks shall be provided at a rate of 1 per 30 parking spaces provided at each phase of development.
- All electrical power, low voltage and information technology distribution shall be installed underground.
- All utility appurtenances shall be placed behind the building setback line and screened.
- Refuse areas outside of the Hospital's depressed loading area shall be enclosed with a 6-foot-high masonry wall on all sides with solid metal doors.
- Parking bumpers are prohibited.
- Parallel spaces shall be 8-foot-wide by 24-foot deep.
- Parking stalls shall be 9-foot-wide by 19-foot-deep stalls with 26-foot-wide aisles for 90-degree parking.
- Loading Area for Hospital is depressed 20 feet to Basement Level including a minimum of five loading docks, vehicle turning and ramping.
- Roof top radio, TV microwave antenna or other antennae are prohibited above roof parapet or screen.

3.4.7 Sustainability

Low Impact Development (LID) features such as vegetated swales, tree-based infiltration, and inert bioswales are included throughout the project site to protect water quality. The buildings will meet or exceed Leadership in Energy and Environmental Design (LEED) Gold certification. This is achieved through the combinations of high-performance building enclosure systems, external shading, energy efficient and carbon neutral building systems and equipment selections, and solar panels.

3.5 Offsite Improvements

Almond Avenue will be expanded in Phase 1. The south (eastbound) side of Almond Avenue currently narrows from two lanes to one lane over a length of about 850 feet extending westward from its intersection with California Street. This segment of Almond Avenue will be widened to include two through lanes. Signage and striping modifications will be made in Almond Avenue and Lugonia Avenue for new driveways. A new traffic signal is planned to be installed at California Street and the project driveway.

The project includes the following offsite utilities connections:

Phase 1:

- Water, to existing main in Lugonia Avenue
- Storm drain, to existing storm drain in Lugonia Avenue

Phase 2:

- Water, to existing main in Lugonia Avenue
- Sewer, to existing mains in Lugonia Avenue and Almond Avenue

Offsite utilities installations are described further in **Table 3.4-1** above.

3.6 Project Operation

The proposed project will operate as a hospital. Operating hours and staff for each of the 4 phases are shown below in **Table 3.6-1**.

Table 3.6-1
Operational Hours and Employment

Phase	Building	Operating Hours (expected)	Staff (Operational)
Existing	Medical Office Building (MOB 1)	Monday through Friday, 7:30 a.m. to 7 p.m. Saturday, 8 a.m. to noon Sunday, Closed	175
Phase 1	ASC/MOB 2	6:00 a.m. to 6:00 p.m.	368
Phase 2	Hospital	24 hours	501
Phase 3	Medical Office	7:00 a.m. to 5:00 p.m.	228
Phase 4	Hospital Addition	24 hours	49
Total	Not applicable	Not applicable	**1,321**

[1] Source: Kaiser Foundation Hospitals, 2024

3.7 Construction Activities

For safety reasons, temporary barricades would be used to limit access to the site during project construction and maintain safe access for construction workers. Construction would occur during daylight and during regular business hours. Lighting for the construction site would be limited to the minimum amount of light needed for safety and security.

For the full project, which will be developed in four phases, site grading would be conducted in Phase 2 to create building pads for buildings and other improvements in phases 2, 3, and 4. Grading would involve raw cut of 79,000 cubic yards (cy); raw fill of 105,000 cy; and net fill (and thus, soil import) export of approximately 26,000 cy. In each phase, after site preparation is completed, infrastructure such as sewer laterals and storm drains would be installed and/or connected to existing facilities. The building foundations would be poured and framing of the buildings would begin. The final steps of construction would involve interior furnishings, detail work, and completion of common areas and outside landscaping. All construction staging, including construction worker parking, will be conducted onsite.

The 1,589,940 square foot (36.5-acre) site is currently a combination of developed impervious surfaces; and pervious landscaping and vacant land. Upon completion of all four phases of development, the building footprint would be 263,000 square feet, surface parking area would be 685,000 square feet, and landscaped area would be 563,000 square feet. The project would result in a total of 948,000 square feet (60 percent) of impervious surface on the project site.

The construction contractor would use heavy equipment during grading and building construction. As the PEIR in preparation is programmatic and construction would be carried out over an indeterminate amount of time, the numbers and types of construction equipment, and numbers of construction workers per construction phase and subphase, are currently unknown. That

information will be obtained as defaults in the software UltraSystems will use to conduct the air quality and greenhouse gas emissions analyses.

Construction Schedule

The conceptual construction schedule for each of the four project phases is set forth below in **Table 3.7-1.**

Table 3.7-1
CONCEPTUAL CONSTRUCTION SCHEDULE

Construction Activity (phase and subphase)	Beginning (month)	Ending (month)	Duration, months
Phase 1			
Site Preparation	October 2027	November 2027	1.0
Utilities Trenching and Installation	November 2027	December 2027	1.5
Grading	December 2027	January 2028	1.0
Building Construction	January 2028	February 2029	13.4
Architectural Coatings	February 2029	March 2029	1.0
Paving	March 2029	May 2029	2.0
Landscaping	May 2029	July 2029	2.0
Phase 2			
Site Preparation	November 2035	January 2036	2.1
Utilities Trenching and Installation	January 2036	April 2036	3.1
Grading	April 2036	July 2036	3.1
Building Construction	July 2036	February 2039	32.0
Architectural Coatings	February 2039	April 2039	2.1
Paving	April 2039	August 2039	4.0
Landscaping	August 2039	November 2039	3.0
Phase 3			
Site Preparation	December 2043	January 2044	1.0
Utilities Trenching and Installation	January 2044	February 2044	1.6
Grading	February 2044	March 2044	1.0
Building Construction	March 2044	February 2045	11.4
Architectural Coatings	February 2045	March 2045	1.0
Paving	March 2045	April 2045	1.0
Landscaping	April 2045	May 2045	1.0
Phase 4			
Site Preparation	November 2047	January 2048	2.0
Utilities Trenching and Installation	January 2048	February 2048	1.5
Grading	February 2048	March 2048	1.0
Building Construction	March 2048	November 2049	20.7
Architectural Coatings	November 2049	January 2050	2.1
Paving	January 2050	February 2050	1.0
Landscaping	February 2050	March 2050	1.0

Source: Wong, 2024

3.8 Discretionary Actions

The proposed project will require the City of Redlands Planning Commission and City Council approval of:

(1): Amendment No. 7 to Concept Plan 1, which would amend the permitting procedure in Concept Plan No. 1, Section IV, Part A (Discretionary Actions) under the East Valley Corridor Specific Plan;

(2): Planned Development No. 6.

Other Permits and Approvals

Following the City's approval of the PEIR, the following permits/approvals, as shown in **Table 3.7-2,** would be required prior to the start of construction.

Table 3.7-2
PERMITS AND APPROVALS

Agency	Permit or Approval
City of Redlands	Grading Permit and Building Permits
California Department of Health Care Access and Information (HCAI)	Hospital permitting
SCAQMD	Permit to Operate Central utility plant under Rule 203

4.0 ENVIRONMENTAL CHECKLIST

Environmental Factors Potentially Affected

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

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

Determination (To Be Completed by the Lead Agency)

On the basis of this initial evaluation:

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

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

_____	_____
Signature	Date
_____	City of Redlands
Printed Name	

Evaluation of Environmental Impacts

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

All answers must take into account the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

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

"Negative Declaration": Less than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to less than significant level.

Earlier analyses may be use where, pursuant to the tiering, Program EIR, or other CEQA process, an affect has been adequately analyzed in an earlier EIR or negative declaration. (See Section 15063(c)(3)(D) of the CEQA Guidelines. In this case, a brief discussion should identify the following:

- Earlier Analyses Used. Identify and state where the earlier analysis available for review.
- Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
- Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated. A source list should be attached and other sources used, or individuals contacted should be cited in the discussion.

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

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

The explanation of each issue should identify:

- The significance criteria or threshold, if any, used to evaluate each question;
- The mitigation measure identified, if any, to reduce the impact to less than significant.

4.1 Aesthetics

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	**X**			
b) Substantially damage scenic resources, including, but not limited to, trees, outcroppings, and historic buildings within a state scenic highway?				**X**
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?	**X**			
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			**X**	

A "visual environment" includes the built environment (development patterns, buildings, parking areas, and circulation elements) and natural environment (such as hills, vegetation, rock outcroppings, drainage pathways, and soils) features. Visual quality, viewer groups and sensitivity, duration, and visual resources characterize views.

- Visual quality refers to the general aesthetic quality of a view, such as vividness, intactness, and unity.
- Viewer groups identify who is most likely to experience the view.
- High-sensitivity land uses include residences, schools, playgrounds, religious institutions, and passive outdoor spaces such as parks, playgrounds, and recreation areas.
- Duration of a view is the amount of time that a particular view can be seen by a specific viewer group.
- Visual resources refer to unique views, and views identified in local plans, from scenic highways, or of specific unique structures or landscape features.

a) Would the project have a substantial adverse effect on a scenic vista?

Potentially Significant Impact

Scenic vistas generally include extensive panoramic views of natural features, unusual terrain, or unique urban or historic features, for which the field of view can be wide and extend into the distance, and focal views that focus on a particular object, scene or feature of interest.

As detailed in the city's General Plan EIR, scenic vistas in the city consist of the scenic corridors and views to and from the open spaces, canyonlands, hillsides, groves, and the San Bernardino Mountains. Scenic views are also found in the urbanized part of the city, including along scenic and historic drives (City of Redlands, 2017b, p. 3.1-9). There are no specific scenic vistas in the East Valley Corridor Specific Plan (City of Redlands, 2017c). The project site is located in a highly urbanized portion of the city with industrial buildings developed on all sides. The project site itself does not contain a scenic view, open spaces, canyonlands, hillsides, or groves.. However, there are views of the of the San Bernardino Mountains from the project site and the Emerald Necklace Trail and Scenic Route abuts the southern portion of the project site along West Lugonia Avenue (City of Redlands, 2017b, p. 3.13-3). Therefore, construction and operation of the project may substantially impact scenic vistas and will be evaluated in the PEIR.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact

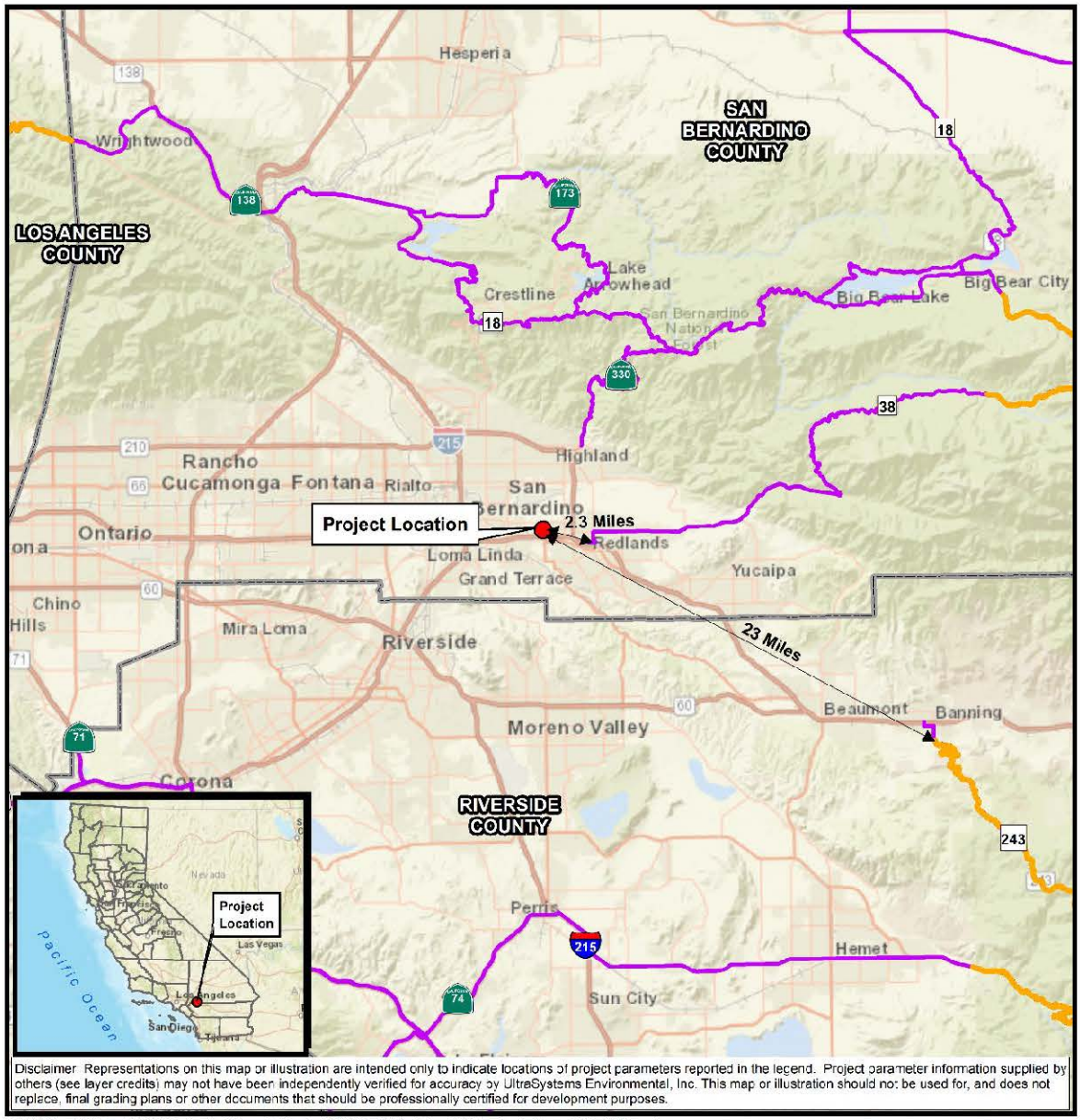
The California Department of Transportation (Caltrans) provides information regarding officially designated or eligible state scenic highways, designated as part of the California Scenic Highway Program. As shown in **Figure 4.1-1**, the nearest designated state scenic highway to the project site is a portion of the State Route-243 (SR-243) freeway, approximately 23 miles southeast of the project site (Caltrans, 2023). The nearest eligible scenic highway is located approximately 2.3 miles east of the project site. Due to the distances of the project site to the nearest officially designated scenic highway and nearest eligible scenic highway along with the amount of development in between, the project would have no impacts on trees, rock outcroppings and historic buildings within a state or county scenic highway.

c) In non-urbanized areas, would the project 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?

Potentially Significant Impact

The project site is located in an urbanized area, and the project should be evaluated to determine if it would conflict with applicable zoning and other regulations governing scenic quality. The City's General Plan contains scenic quality regulations. However, as mentioned above, the project site would be required to be evaluated for scenic quality. Therefore, this aspect of the project will be further evaluated in the PEIR to be prepared for the project.

Figure 4.1-1
STATE SCENIC HIGHWAYS



d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less than Significant Impact

The project site is located in a highly urbanized area characterized with ambient lightning from lighting poles, vehicle lights, and lighting from surrounding development. During the construction and operation phases of the project, the project would create additional lighting in the project area for visibility and safety purposes. No sensitive land uses are in the project area. The project site is surrounded by industrial development on all sides. Additionally, the project would adhere to Section EV4.2015, Site Lighting, of the East Valley Corridor Specific Plan, which would ensure that light and glare from project construction and operation would not cause significant spillover to adjacent rights-of-way or adjacent properties (City of Redlands, 2017c, p. D4-55). Therefore, impacts are less than significant.

4.2 Agriculture and Forestry Resources

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?			**X**	
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				**X**
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220(g)), timberland (as defined by Public Resources Codes § 4526), or timberland zoned Timberland Production (as defined by Government Code § 51104(g))?				**X**
d) Result in the loss of forest land or conversion of forest land to non-forest use?				**X**
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				**X**

a) Would the project 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?

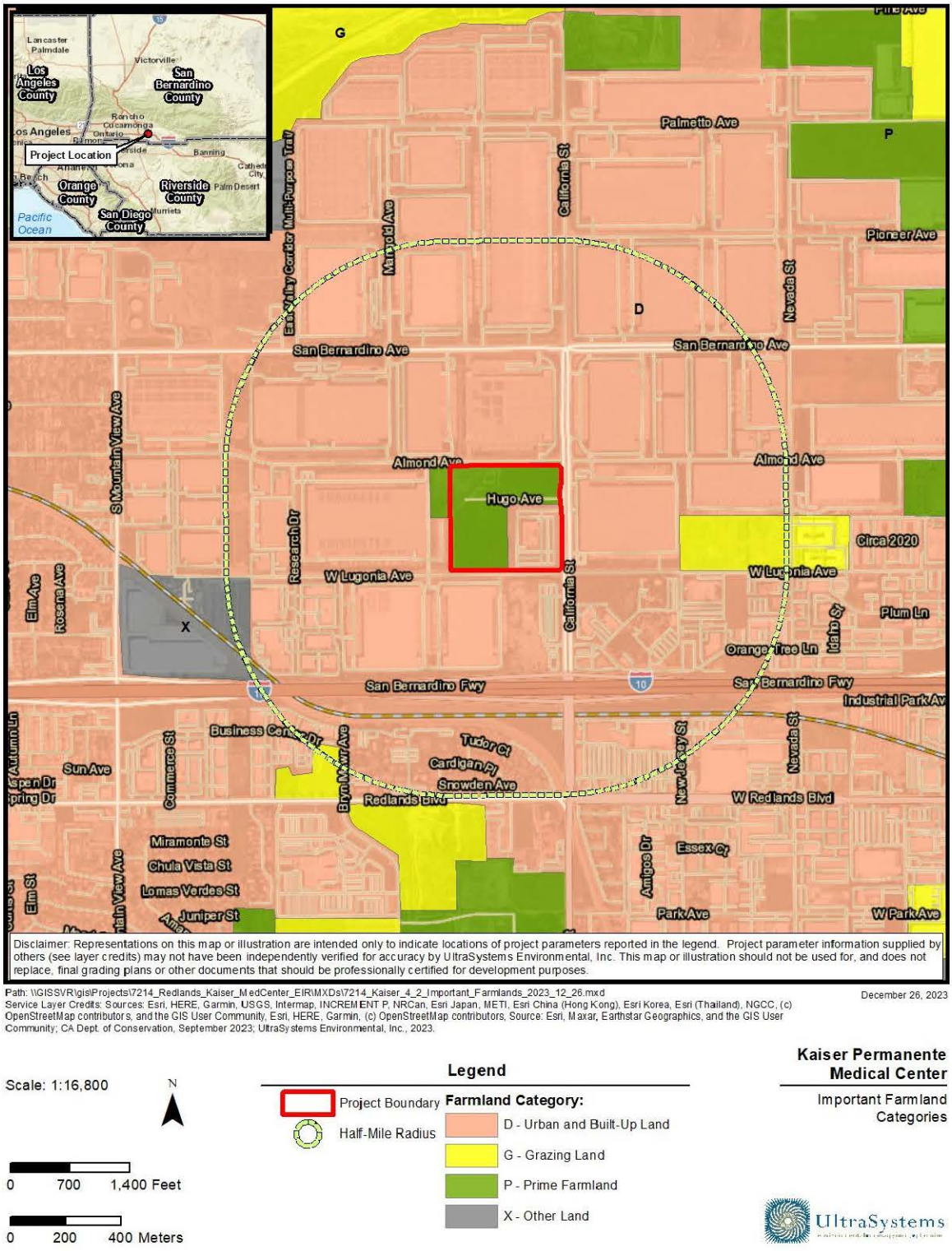
Less than Significant Impact

The Farmland Mapping and Monitoring Program (FMMP) was established in 1982 by the California Department of Conservation (DOC) to analyze critical agricultural farmlands and observe land conversion change over time.

Approximately 25.2 acres of the project site are mapped as prime farmland by the FMMP (see **Figure 4.2-1**). Prime farmland has the best combination of physical and chemical features able to sustain long term agricultural production (DOC, 2024). CEQA analysis applies to three categories of mapped important farmland: prime farmland, farmland of statewide importance, and unique farmland. A Land Evaluation and Site Assessment (LESA) analysis is required for this project site.

The project site is not irrigated; a pedestrian survey for archaeological resources conducted by UltraSystems in November 2023 found no evidence of an irrigation system that has been operational within the last few years. The Phase I Cultural Resources Inventory for the project site (UltraSystems, 2023) noted that Marigold Farms, a dairy, farming, and ranching operation operated on land including the project site dating from 1915 through approximately 1991.

Figure 4.2-1
IMPORTANT FARMLAND CATEGORIES



Site Soil

The entire project site is mapped as Hanford sandy loam, 0 to 2 percent slopes; map symbol HbA, by the Natural Resources Conservation Service (NRCS, 2023).

Land Evaluation and Site Assessment Analysis

The Land Evaluation and Site Assessment model, issued by the California Department of Conservation in 1997, consists of two major portions: Land Evaluation (LE), that assesses the capability of the project site for intensive commercial agriculture; and Site Assessment (SA), which addresses the project site's size; water resource availability, surrounding agricultural land, and surrounding protected resource lands. Each of these factors is separately rated on a 100-point scale. Each of the six factors is then weighted relative to one another and combined, yielding a single numeric score for a given project, with a maximum attainable score of 100 points. The significance determination is based on the subtotal LE and SA scores. If the LE and SA scores are each 20 or over (out of 50 possible for each), then the impact on mapped important farmland is determined to be significant (DOC, 2011).

The LESA analysis presented below is simplified somewhat from the full LESA model in that only one soil type is present onsite (Hanford sandy loam, 0 to 2 percent slopes; map symbol HbA). The full LESA model includes procedures for assessing multiple soil types on one project site that are omitted here, as they are inapplicable to this project site.

Land Evaluation Factors

Land Capability Classification (LCC) - The LCC indicates the suitability of soils for most kinds of crops. The classification is based on limitations of the soils when used to grow crops, and the risk of damage to soils when they are used in agriculture. LCC is rated on a scale from I to VIII, with I indicating the greatest suitability for growing crops. The LCC rating includes a subclass indicating the chief limitation to crop growing. Subclasses are as follows:

- "e" Erosion (unless close-growing plant cover is maintained)
- "w" Water in or on the soil interferes with plant growth or cultivation (in some soils the wetness can be partly corrected by artificial drainage)
- "s" The soil is limited mainly because it is shallow, droughty, or stony
- "c" Used in only some parts of the United States, shows that the chief limitation is climate that is very cold or very dry (DOC, 1997, p. 7; NRCS, 2023)

The LCC for soil type HbA (non-irrigated) is IIIc. LCC point ratings are provided for soils with LCC subclasses of e, w, and s. The project region is arid but is not extremely cold. Therefore, of the three subclasses for which LCC point ratings are provided, subclass s is closest to subclass c.
LCC of IIIc has an LCC rating of 60. The entire project site (100 percent) is soil type HbA; thus, the LCC score for the site (LCC rating x Percent of site consisting of soil type HbA) is also 60.

Storie Index The Storie Index provides a numeric rating (based upon a 100-point scale) of the relative degree of suitability or value of a given soil for intensive agriculture. The Storie index is based on four factors; profile characteristics, texture of the surface layer, slope, and other factors (e.g., drainage, salinity) (DOC, 1997, p. 7). The revised Storie index for the project site is 85. The Storie index score for the site (Storie index x Percent of site consisting of soil HbA) is also 85.

Site Assessment Factors

The LESA model includes four site assessment factors: the project site's size; water resource availability, surrounding agricultural land, and surrounding protected resource lands.

Project Site Size: Project site size is included in the LESA model due to economies of scale; greater flexibility in farm management and marketing decisions; and the greater economic impact of larger farms (DOC, 1997, p. 14). LCC Class III soils on areas ranging from 20 to 39 acres have a project size score of 60. The project size score for the project site (given that only one soil type is present onsite) is therefore 60.

Water Resource Availability: The water resources availability rating involves identifying water sources for the project site, then determining whether supply restrictions would constrain agricultural production in drought or non-drought years (DOC, 1997, p. 16). The City of Redlands Municipal Utilities & Engineering Department (MUED) Water Division provides water to nearly the entire City of Redlands including the project site. MUED water supplies consist of approximately 50 percent surface water from Mill Creek and the Santa Ana River, and 50 percent groundwater from two local groundwater basins, the Bunker Hill and Yucaipa subbasins of the Upper Santa Ana River Groundwater Basin (Redlands, 2021, pp. 4.13, 4.14). MUED provides two types of water for agricultural irrigation: potable water; and recycled water from the City of Redlands Wastewater Treatment Plant and groundwater. Agricultural irrigation supplies in 2020, the latest year for which data are available, were 276 acre-feet (af) of potable water and 4 af of raw water (City of Redlands, 2021, p. 4-6).

Based on Step 4 of the LESA Model: "Irrigated agricultural production is *feasible* when 1) There is an existing irrigation system on the project site that can serve the portion of the project identified in Step 2 (DOC, 1997, p. 18). Although the site was previously used for agricultural crops, the site does not currently have a suitable irrigation system. Natural irrigation from rain would not be enough to sustain expected crops in this area. This analysis is based on past use by Marigold Farms which was a dairy, farming, and ranching operation (UltraSystems, 2023). This analysis assumes that alfalfa would have been the main plant crop during that time. Alfalfa requires about five af of irrigation (that is, 60 inches depth of water one acre in area) per acre annually (Pacific Institute, 2015). Average annual rainfall in Redlands is 13.56 inches, slightly less than 25 percent of the irrigation requirement for alfalfa. Thus, dryland production of alfalfa is considered infeasible. A second representative crop, oranges, was chosen based on the existing conditions description in the 1988 final environmental impact report (FEIR) for the East Valley Corridor Specific Plan (EVCSP). The FEIR noted that most of the portion of the EVSCP area north of I-10 was in agricultural use, with most of that area cultivated as citrus orchards and the majority of the citrus crops being oranges (City of Redlands, 1988). A mature orange orchard cultivated using low volume irrigation requires 30 inches of irrigation water per year (UCCE, 2005). Again, as with alfalfa, dry-land production of oranges in the project region is infeasible. Based in this information, the water resource availability score where neither irrigated nor dryland production are feasible is 0.

Surrounding Agricultural Land and Surrounding Protected Land: Assessment of the last two SA factors, surrounding agricultural land and surrounding protected land, are typically assessed based on a Zone of Influence (ZOI), that is, a buffer at least 0.25 mile wide surrounding the project site, and that can range up to 0.5 mile wide in rural areas.[5] The Surrounding Agricultural Land factor assesses what portion of the ZOI in in agricultural use. The Surrounding Protected Land factor assesses what portion

[5] The Zone of Influence includes parcels within 0.25 mile of the project site, plus all parcels intersected by a rectangle extending 0.25 mile on all sides beyond a rectangle circumscribing the project site, excluding the project site (DOC, 2011).

of the ZOI is protected such that it is available for future agricultural use (e.g., as open space). For this project site there is no need to designate a ZOI, as all of the surrounding land is developed with industrial uses, the San Bernardino County Museum, and Splash Mountain, a closed theme park that is proposed for industrial redevelopment. The surrounding agricultural land and surrounding protected land assessments are based on land within 0.25 mile of the project site, as shown on **Figure 4.2-2.**

Surrounding Agricultural Land: None of the land within 0.25 mile of the project site is in agricultural production; the surrounding agricultural land score is therefore 0.

Surrounding Protected Land: No land within 0.25 mile of the project site is protected as open space (Greeninfo Network, 2023a). The US Natural Resources Conservation Service (NRCS) holds an easement on a 3.17-acre area within the San Bernardino County Museum property (Greeninfo Network, 2023b). The area within 0.25 mile of the project site, excluding the project site, is about 314 acres. The easement is approximately one percent of the area within 0.25 mile of the project site. The surrounding protected land score where 40 percent or less of the ZOI is protected land is 0.

Final LESA Score and Significance Determination

The LESA scores for each of the six factors are summarized below in **Table 4.2-1**. The assessment is based on the entire 37-acre site consisting of one soil type, Hanford sandy loam, 0 to 2 percent slopes; map symbol HbA.

Determining significance of impacts to mapped important farmland can be simplified down to one rule: the impact is significant if the LE and SA subscores are each 20 or greater.[6] As the SA score is 9, the impact on mapped important farmland is less than significant.

Table 4.2-1
LAND EVALUATION AND SITE ASSESSMENT SCORE SUMMARY

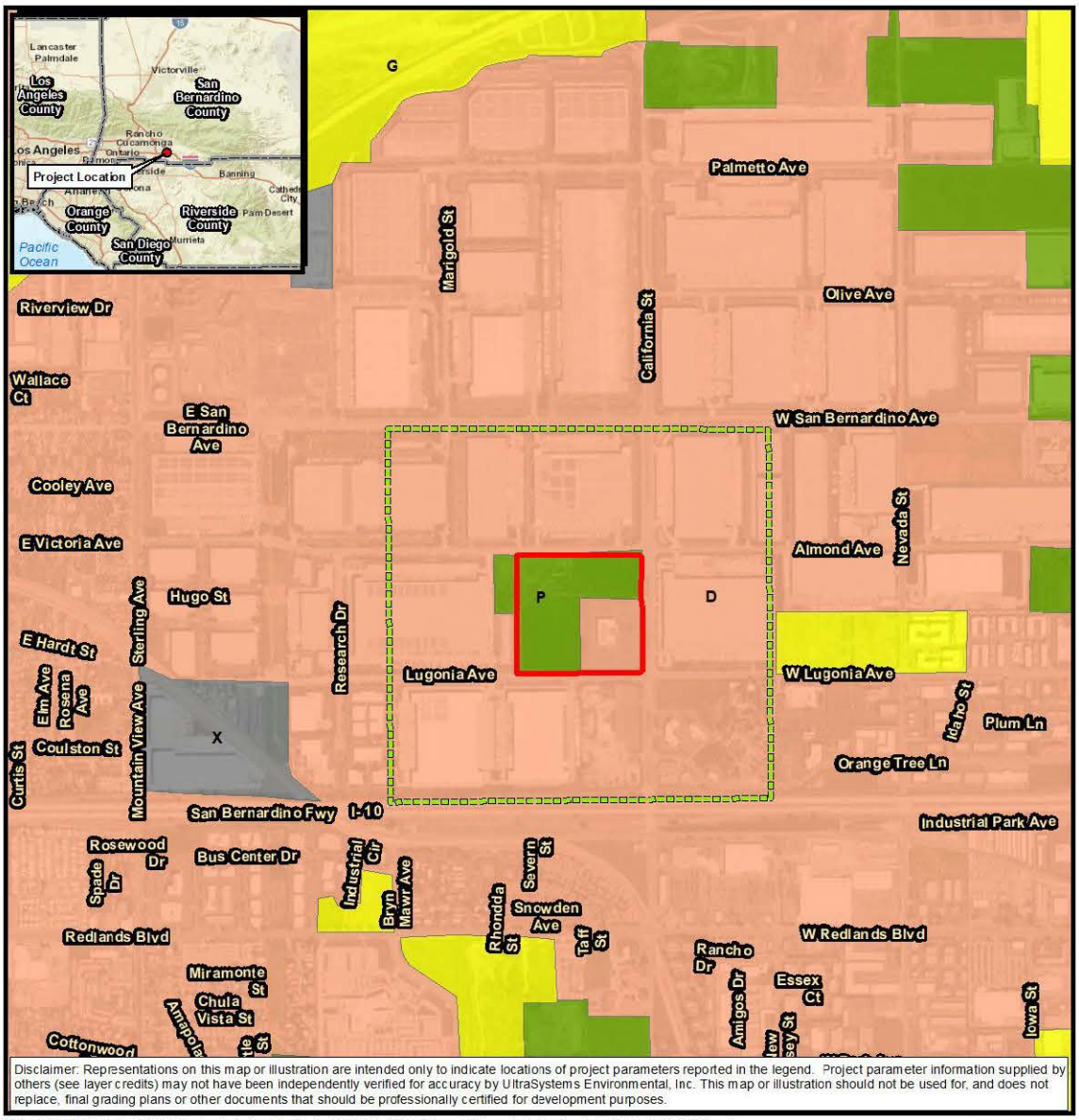
	Factor	Factor Rating	Factor Score	Factor Weight	Weighted Factor Score
Land Evaluation (LE)					
LCC	IIIc	60	60	0.25	15
Storie Index	85	85	85	0.25	21.25
LE Subscore	NA	NA	NA	0.5	**36.25**
Site Assessment (SA)					
Project Site Size	NA	NA	60	0.15	9.0
Water Resource Availability	NA	NA	0	0.15	0
Surrounding Agricultural Land	NA	NA	0	0.15	0
Surrounding Protected Land	NA	NA	0	0.05	0
SA Subscore	NA	NA	NA	0.5	**9.0**
Final LESA Score					
Final LESA Score	NA	NA	NA	1	**45.25**

NA = not applicable
Source: factors, factor ratings, factor scores, and factor weights are from DOC 2011.

[6] The four scoring rules set forth in the LESA Model Instructions are as follows:

Final LE Score	Significance Determination
≤39	Less than significant
40-59	Significant if LE and SA subscores are each 20 or greater
60-79	Significant unless LE or SA subscore is less than 20
80+	Significant (DOC, 1997)

Figure 4.2-2
0.25-MILE-WIDE BUFFER SURROUNDING PROJECT SITE



b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact

The Williamson Act, also known as the California Conservation Act of 1965, authorizes local governments to work with private landowners by negotiating an agreement to tax these landowners at lower rates if they restrict specific pieces of land to agricultural or open space use. The project site is not mapped as enrolled in a Williamson Act contract by the California Department of Conservation (DOC, 2023). The zoning district for the site is Concept Plan 1 under the East Valley Corridor Specific Plan. Concept Plan 1 permits development of a master-planned business park consisting of retail, office, medical, and industrial uses (Urban Environs, et al., 2004). Concept Plan 1 does not permit agricultural uses. Therefore, the project would not conflict with existing zoning for agriculture uses or any Williamson Act contracts. No impacts would occur.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220(g)), timberland (as defined by Public Resources Codes § 4526), or timberland zoned Timberland Production (as defined by Government Code § 51104(g))?

No Impact

The project site is zoned CP-1 (Specific Plan), and is not zoned for forest land or timberland. The project site consists of undeveloped land and existing buildings, and does not contain forest or timberland. Therefore, there would be no impact, and this issue will not be analyzed further in the PEIR to be prepared for the project.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact

The project site and surroundings are not cultivated for forest resources. Therefore, project development would not result in the loss of forest land or conversion of forest land to non-forest use, and no impact would occur. This issue will not be analyzed further in the PEIR to be prepared for the project.

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact

The project site surroundings are mapped as Urban and Built-Up Land, and not as any category of mapped important farmland, by the Division of Land Resource Protection. The site is surrounded by industrial uses. Project development would therefore have no impact on conversion of farmland or forest land to non-agricultural uses, and no impact would occur.

4.3 Air Quality

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

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact

The proposed project is located within the South Coast Air Basin (SCAB). The distinctive climate of the Basin is determined by its terrain and geographic location. The SCAB is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the southwest and high mountains around its remaining perimeter. To assist in implementing plans to attain compliance with federal and state ambient air quality standards (AAQS), the South Coast Air Quality Management District (SCAQMD) developed criteria for determining whether emissions from a project are regionally significant. They are useful for estimating whether a project is likely to result in a violation of the ambient air quality standards (AAQS) or is in conformity with plans to achieve attainment. The proposed project would generate air pollution during the construction and operational phases. Therefore, further and more detailed analysis of this issue is warranted. The project's potential impacts regarding applicable air quality plans will be analyzed in the PEIR to be prepared for the project.

b) Would the project 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?

Potentially Significant Impact

The SCAB is currently in nonattainment for federal ozone and $PM_{2.5}$ AAQS , and state ozone, $PM_{2.5}$ and PM_{10} AAQS. It is in attainment for the remaining federal and state AAQS (USEPA, 2023). The proposed project may exceed an air quality standard or contribute to an existing or projected air quality exceedance. It may result in an increase in air pollutants during short-term construction and long-term operation. Construction-related air pollution would be from onroad worker vehicle trips and from offroad construction equipment. During project operations, air pollutants would be primarily generated from motor vehicle travel and consumption of energy. Therefore, further and more detailed analysis of this issue is warranted. The project's potential impacts regarding air quality will be analyzed in the PEIR to be prepared for the project.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact

The project would have the potential to create localized short-term air quality impacts from construction, which may potentially exceed the localized significance thresholds for criteria pollutants established by the SCAQMD for construction sites. A significant impact may occur if a project were to generate air pollutant concentrations to a degree that would significantly affect sensitive receptors. Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be sensitive to poor air quality because the very young, the old, and the infirm are more susceptible to respiratory infections and other air quality-related health problems than is the general public. Therefore, further and more detailed analysis of this issue is warranted. The project's potential impacts on sensitive receptors will be evaluated in the PEIR to be prepared for the project, by using the SCAQMD's localized significance analysis methodology.

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

Less than Significant Impact

A significant impact may potentially occur if a project were to generate obnoxious odors. The project involves the construction and operation of commercial uses, such as medical offices and facilities, that are not typically associated with odor complaints. The largest potential source of odors during construction is equipment exhaust. Odors from these sources would be localized and generally confined to the immediate project area. The project would use typical construction techniques, and the odors would be typical of most construction sites, would be temporary in nature, and would not be sufficient to impact a substantial number of people or result in a nuisance per SCAQMD Rule 402. According to the SCAQMD *CEQA Air Quality Handbook (SCAQMD, 1993)*, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The project involves no industrial elements, so no long-term operational objectionable odors are anticipated. No further assessment of this issue is warranted, and this issue will not be analyzed in the PEIR to be prepared for the project.

4.4 Biological Resources

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	**X**			
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	**X**			
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	**X**			
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 nursery sites?			**X**	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	**X**			
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?				**X**

4.4.1 Methodology

UltraSystems biologists researched readily available information, including relevant literature, databases, agency websites, various previously completed reports and management plans, GIS data, maps, aerial imagery from public domain sources, and in-house records to identify the following: 1) habitats, special-status plant and wildlife species, waters of the U.S. and State, critical habitats, and wildlife corridors that may occur in and near the project site; and 2) local or regional plans, policies, and regulations that may apply to the project.

A biological survey will be conducted, and a Biological Resources Evaluation report will be included for further analysis of impacts to biological resources, in the PEIR for the proposed project.

Sources accessed by UltraSystems for analysis of potential impacts within this Initial Study include:

- California Natural Diversity Database (CNDDB), provided by the CDFW (CNDDB, 2024a);
- Information, Planning and Conservation (IPaC), provided by the United States Fish and Wildlife Service (USFWS; USFWS, 2024a);
- Critical Habitat Portal, provided by the USFWS (USFWS, 2024b);
- Inventory of Rare and Endangered Plants of California, Online Edition (ver. 9.5), provided by the California Native Plant Society (CNPS, 2024a);
- A Manual of California Vegetation, Online Edition (CNPS, 2024b);
- California Invasive Plant Inventory, provided by the California Invasive Plant Council (Cal-IPC, 2006);
- eBird online database of bird distribution and abundance, provided by Cornell Lab of Ornithology (eBird, 2024);
- EPA Waters GeoViewer, provided by USEPA (USEPA, 2024);
- United States Geological Survey (USGS) 7.5-Minute Topographic Map *Redlands* Quadrangle and current aerial imagery (USGS, 2015; Google Earth Pro, 2024);
- and several other sources as cited in the text.

A biological reconnaissance survey was not conducted for this Initial Study of the project but will be conducted for preparation of the PEIR. A desktop study of the project site and a 500-foot buffer (collectively known as the BSA; see **Figure 4-4-1**) was conducted in which aerial imagery was overlaid with geospatial data by utilizing Geographic Information System (GIS) software to identify documented observations of the following biological or environmental components within the project vicinity, including:

1) Previously recorded observations within the project vicinity and geographic range of special status species and potentially suitable habitats;
2) special-status vegetation communities;
3) protected management lands;
4) proposed and final critical habitats;
5) waters of the State and waters of the U.S., including wetlands; and
6) wildlife corridors.

Figure 4.4-1
PROJECT BOUNDARY AND BIOLOGICAL STUDY AREA

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

Potentially Significant Impact

Plants

Plant species identified in this analysis were determined based on photographs available online and in a literature review of publicly available databases (CNDDB, 2024a; CNPS, 2024a; USFWS, 2024a,b). This review of plant species is referred to hereafter as the *plant inventory*.

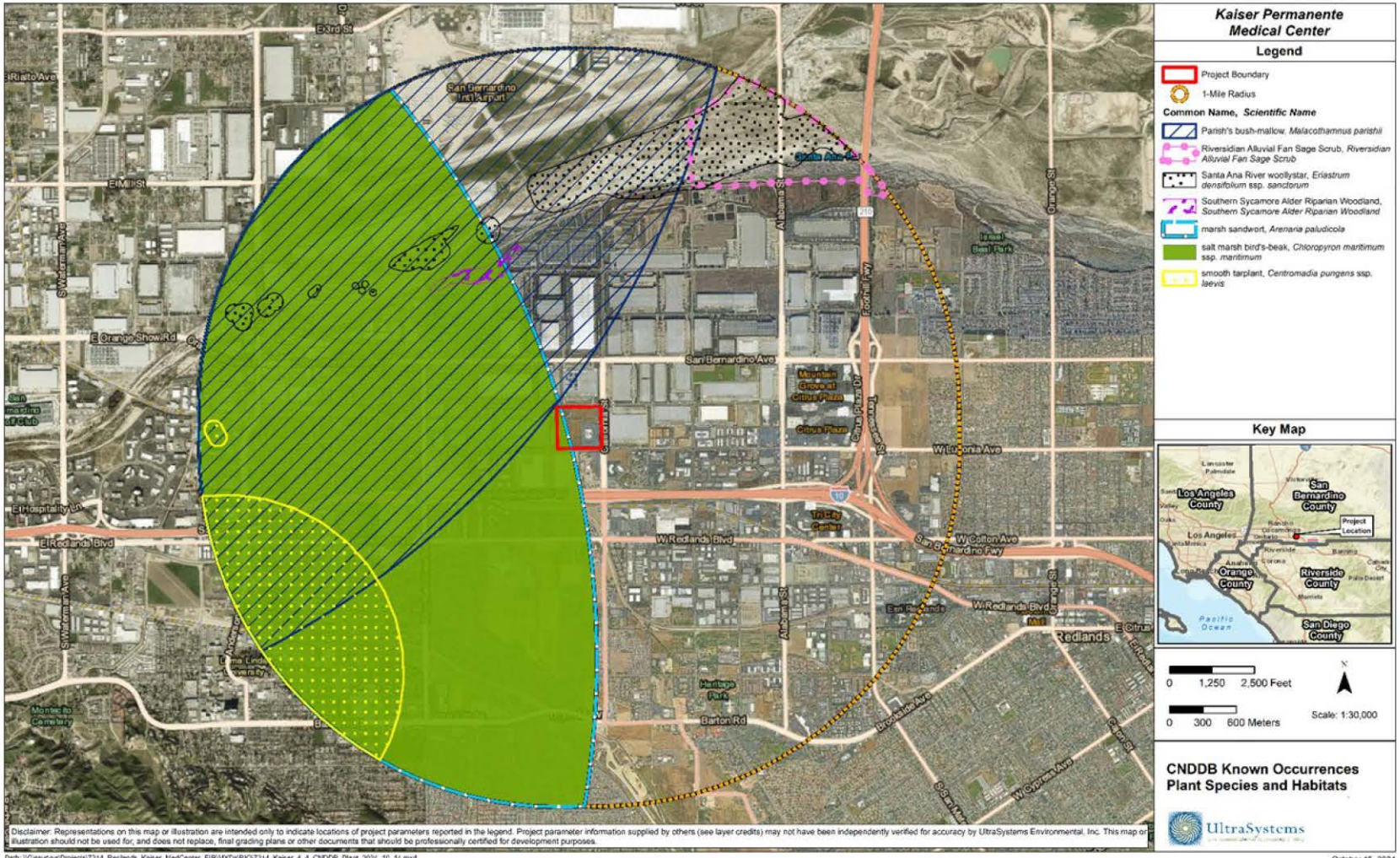
A total of 34 special-status plant species (nine listed and 25 sensitive; collectively referred to as *special-status species*), were identified in the plant inventory as having been recorded within a 10-mile radius of the project site (CNDDB, 2024a). **Figure 4.4-2** displays the five special-status species recorded by the CNDDB within a two-mile radius of the BSA (CNDDB, 2024a).

The special-status plant species reported in the plant inventory were evaluated as to their potential to occur in the BSA based on habitat, geographic and elevational range and site conditions (Calflora, 2024; CDFW, 2024a; CNDDB, 2024a, c; CNPSa, 2024; Google Earth Pro, 2024; iNaturalist, 2023; Jepson eFlora, 2024; Soil Survey Staff, 2024; USFWS, 2024a). Due to biological and physical disturbances within the BSA, it was determined that there is a lack of suitable habitat to support the majority of the special-status plant species identified in the 10-mile radius database query. Some species for which the BSA overlaps with the appropriate elevation range and species range were excluded because the level of disturbance in undeveloped areas resulting from mowing and disking degrade the quality of habitat in the BSA for special-status plants. The majority of the undeveloped area on the project site is covered with ornamental turf grass. Additionally, there is significant coverage of the project site by impermeable surface (developed areas) that cannot support suitable habitat to support many of these species.

Based on the results of the literature review and desktop study, nine special-status plant species within the plant inventory were determined to have a low potential to occur within the BSA due to lack of optimal habitat there. These nine species are listed below.

- San Diego ambrosia (*Ambrosia pumila*) FE /CRPR 1B.1;
- Nevin's barberry (*Berberis nevinii* [=*Mahonia nevinii*]) FE, SE, CRPR 1B.1;
- thread-leaved brodiaea (*Brodiaea filifolia*) FT, SE, CRPR 1B.1
- slender-horned spineflower (*Dodecahema leptoceras*) FE, SE, CRPR 1B.1
- smooth tarplant (Centromadia pungens ssp. laevis [=Hemizonia pungens ssp. laevis]) CRPR 1B.1;
- Parry's spineflower (*Chorizanthe parryi* var. *parryi*) CRPR 1B.1;
- mesa horkelia (Horkelia cuneata var. puberula [=Horkelia cuneata ssp. puperula]) CRPR 1B.1
- Robinson's pepper-grass (*Lepidium virginicum* var. *robinsonii*) CRPR 4.3;
- San Bernardino aster (Symphyotrichum defoliatum [=Aster bernardinus]) CRPR 1B.2

Figure 4.4-2
CNDDB KNOWN OCCURRENCES PLANT SPECIES AND HABITATS



The project is not anticipated to significantly impact these species that were determined to have only a low occurrence potential. None of the plant species evaluated in the plant inventory were determined to have a high or moderate potential to occur in the BSA. The remainder of the plant species evaluated in the plant inventory were determined to not be expected to occur because there is lack of suitable conditions there to support them. A Reconnaissance-Level Biological Survey will be conducted and the results of that survey including the presence of and potential impacts to special-status plant species will be discussed in the PEIR.

Wildlife

Wildlife species identified with potential to occur were determined based on a literature review of publicly available databases (CNDDB, 2024a; eBird 2024; USFWS 2024a,b; iNaturalist 2024) and desktop study. This review of wildlife species is hereafter referred to as the *wildlife inventory*.

A total of 58 special-status wildlife species (19 listed and 39 sensitive) were reported in the wildlife inventory as having been documented within 10 miles of the BSA, or recognized as occurring based on previous surveys or knowledge of the area.

Eighteen of the 58 species in the wildlife inventory have been recorded within a two-mile radius from the project site (CNDDB, 2024a; see **Figure 4.4-3**) and are discussed below.

The special-status wildlife species reported in the literature review were evaluated as to their potential to occur in the BSA based on habitat, geographic and elevational range and site conditions (CNDDB, 2024a, b, d; CDFW, 2024b; eBird, 2024; iNaturalist, 2024; Sibley, 2000; USFWS, 2024a, WBWG, 2024; Zeiner et al., 1988-1990). The majority of the special-status wildlife species evaluated in the wildlife inventory are not expected to occur due to the following factors: urbanization of the area, lack of suitable habitat, and/or the site is outside of the known elevation, and/or general distribution of the target species. Additionally, many of the wildlife species in the wildlife inventory require native vegetation for their foraging and nesting requirements. Thus, certain species would not have sufficient foraging habitat or cover for nesting or shelter requirements

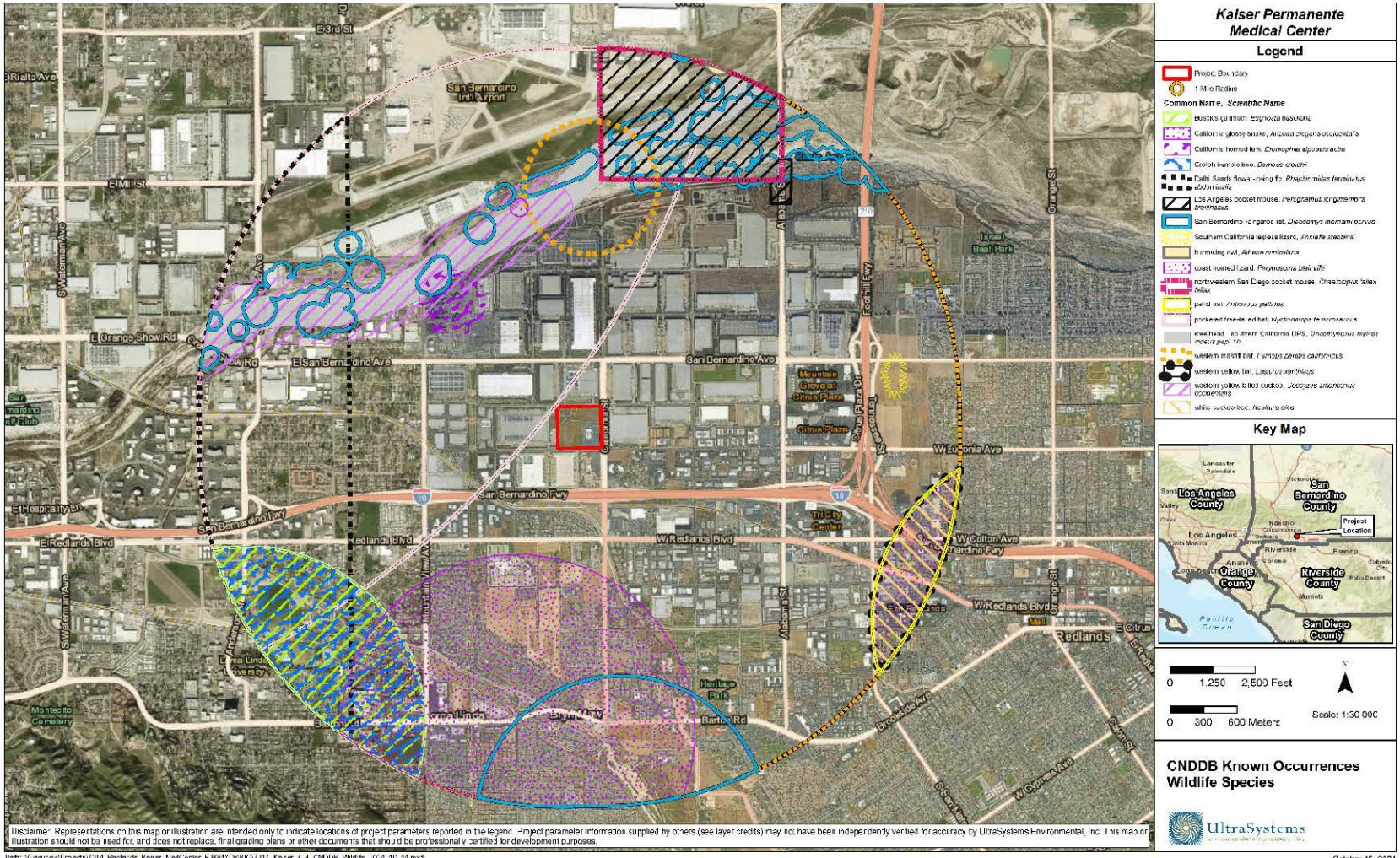
Based on the results of the literature review and desktop study, 19 of the 58 species in the wildlife inventory wildlife were determined to have a low potential to occur within the BSA. One listed and two sensitive wildlife species were determined to have a moderate potential to occur on the project site.

Moderate Potential to Occur

Burrowing owl (*Athene cunicularia*)

The project site contains disturbed, sparsely-vegetated areas with friable soils. These conditions create suitable habitat to support burrowing owl (SCT, SSC, BCC - Season of Concern: burrowing sites and some wintering sites). The results of the literature review (CNDDB, 2024a; Cornell Lab of Ornithology, 2024; Gallagher, 1997; Google Earth Pro, 2024; USFWS, 2024a) determined that there is moderate potential for burrowing owl to colonize the site.

Figure 4.4-3
CNDDB KNOWN OCCURRENCES WILDLIFE SPECIES



The burrowing owl is a small, ground-inhabiting owl found throughout the southern United States. Typical burrowing owl habitat is open, dry, flat ground or low rolling hills with sparse vegetation, containing available burrows (Gallagher, 1997). In general, burrowing owl prefer to occupy open habitat with sparse tree and shrub cover because the sparse vegetative cover improves their ability to spot and hunt prey. Nest and roost burrows of the burrowing owl in California are most commonly dug by California ground squirrels (*Spermophilus beecheyi*) but may also be created by other mammals. Burrow openings are typically at least four inches in diameter. burrowing owl can also utilize artificial structures such as debris piles from which to hunt and to use as nest sites.

The California Fish and Game Commission unanimously voted on October 10, 2024 to protect burrowing owl throughout California as a candidate species under the California Endangered Species Act (CESA). As a candidate species under CESA, burrowing owl is afforded the same level of protection as fully listed species. A Reconnaissance-Level Biological Survey will be conducted and the results of that survey and potential impacts to this species will be discussed in the PEIR.

California horned lark (*Eremophila alpestris actia*)

California horned larks (CDFW Watch List) are residents of a variety of open habitats, usually where trees and large shrubs are absent. They are found from grasslands along the coast and deserts near sea level to alpine dwarf-shrub habitat above tree line. They prefer short, sparsely vegetated prairies, deserts, and agricultural lands. With regards to agricultural land, it may be recently plowed land, with or without emerging crops, or land used the previous year for crops, and then mowed short and left fallow, or very sparse, heavily grazed annual grassland. This species can also be found on sites containing a large expanse of mowed weeds. These birds breed primarily in open fields from March through July, with peak activity in May. They usually build a cup-shaped grass-lined nest and in depression on the ground in the open. These birds forage on the ground in either bare areas or in agricultural fields with short vegetation. A Reconnaissance-Level Biological Survey will be conducted and the results of that survey and potential impacts to this species will be discussed in the PEIR.

Cooper's hawk (*Accipiter cooperii*)

Cooper's hawks (CDFW Watch List) are medium-sized hawks of the woodlands. These raptors are commonly sighted in parks, neighborhoods, over fields, and even along busy streets if there are large trees nearby for perching and adequate prey species such as other birds and small mammals. They prefer to breed in more densely wooded areas than occur in the BSA, such as woodland openings and edges of riparian and oak habitat. Cooper's hawks build nests in pines, oaks, Douglas-firs, beeches, spruces, and other trees. Males typically build the nest over a period of about two weeks, with just the slightest help from the female. Nests are piles of sticks roughly 27 inches in diameter and 6-17 inches high with a cup-shaped depression in the middle, 8 inches across and 4 inches deep. The cup is lined with bark flakes and, sometimes, green twigs (Cornell Lab of Ornithology, 2024).

Many trees within the BSA are routinely trimmed, removing dense foliage needed for nesting cover. Thus, some onsite trees may not provide optimal nesting habitat for this raptor. Cooper's hawks breed between March and August; tree removal activities associated with the project would directly impact nesting and breeding behavior of this raptor, and noise and dust generated by construction activities would indirectly impact its foraging and nesting behavior. A Reconnaissance-Level Biological Survey will be conducted and the results of that survey and potential impacts to this species will be discussed in the PEIR.

MBTA Birds

Migratory birds are protected by the federal Migratory Bird Treaty Act (MBTA) and also by the California Fish and Game Code, which renders it unlawful to take migratory birds, and their nests, eggs, and young. California courts have held that *take*[7] includes incidental take and is not limited to hunting and fishing and other activities that are specifically intended to kill fish and wildlife.

Trees within the BSA could provide suitable current or future bird nesting sites, including ornamental trees such as jacaranda (*Jacaranda mimosifolia*), Callery pear (*Pyrus calleryana*), American sweetgum (*Liquidamber styraciflua*), and other ornamental tree species within the facility grounds, and trees that occur within the undeveloped lands adjacent to the facility grounds. Additionally, the bare ground that currently comprises the majority of the project site could provide suitable habitat for ground-nesting birds such as killdeer (*Charadrius vociferus*), horned lark (*Alauda alpestris*), and California horned lark. If construction activities begin during the nesting season (between January 1 and August 31 of any given year, or as determined by a local CDFW office), direct and indirect impacts to migratory birds could occur as a result of tree trimming and nest destruction, increased noise, vibration, and dust during construction. This could adversely affect the breeding behavior of some birds, and lead to the loss (take) of eggs and chicks, or nest abandonment.

Impacts to nesting birds would have a potential significant impact if protected breeding birds are present. A Reconnaissance-Level Biological Survey will be conducted and the results of that survey and potential impacts to these species will be discussed in the PEIR.

Until a biological reconnaissance survey is conducted, potential impacts to burrowing owl and other special-status species cannot be determined and impacts may be significant. The presence of and potential impacts to special-status plant and wildlife species will be discussed in the forthcoming PEIR.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Potentially Significant Impact

Land Cover Types

Based on the literature review and aerial photos, the project site may include developed/ornamental land cover type and disturbed land cover type. These are discussed below. However, a biological reconnaissance survey will be conducted, and the results of that survey will be included in the PEIR being prepared for this project.

Developed/ornamental. Developed/ornamental land cover includes areas that often support man-made structures such as houses, sidewalks, buildings, parks, water tanks, flood control channels, transportation infrastructure (bridges and culverts), and ornamental landscaping, consisting of exotic, or non-native, plant species, that occurs in parks, gardens and yards. Developed areas in the

[7] The MBTA makes it unlawful to pursue, hunt, take, capture, kill, possess, sell, purchase, barter, import, export, or transport any migratory bird, or any part, nest, or egg or any such bird, unless authorized under a permit issued by the Secretary of the Interior. Some regulatory exceptions apply. *Take* is defined in regulations implementing the MBTA as "to pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to carry out these activities." The MBTA prohibits the collection and destruction of a migratory bird, its nest, and birds or eggs contained in the nest.

BSA contain segments of Almond Avenue, West Lugonia Avenue, and California Street with parking lots, driveways, sidewalks, shipping containers, commercial developments, and other permanent structures. These developed areas provide virtually no habitat for wildlife species. Landscaped (ornamental trees, shrubs, turf, etc.) areas associated with the developed lands within the BSA provide limited habitat for wildlife species; however, birds could use the ornamental trees for foraging and nesting. Ornamental tree species within the parking lot and bordering the streets adjacent to the parking lot include Jacaranda (*Jacaranda mimosifolia*), Callery pear (*Pyrus calleryana*), American sweetgum (*Liquidamber styraciflua*), and other ornamental tree species. Developed/ornamental land cover is not considered a sensitive natural community, according to the CDFW *Natural Community List* (CDFW, 2024b).

Disturbed. The disturbed land cover type is characterized by soils that are either barren and thus completely lacking vegetation or covered with ruderal vegetation including native and non-native trees, shrubs, forbs, and grasses. The disturbed land cover occurs in undeveloped fields that are north, west, and northwest of the developed hospital grounds as well as in an offsite field that is southeast of the intersection of West Lugonia Avenue and California Street. All of this disturbed land cover is within the project site, with the exception of a section of the field northwest of the existing medical facility grounds that abuts the Ashley Furniture Distribution Center to the west. Based on aerial photos, most areas in the disturbed land cover within the project site consist of ruderal forb and grass species such as Russian thistle (*Salsola tragus*), cheeseweed (*Malva parviflora*), and other forb and annual grass species. Immediately northwest of the northwest corner of the parking lot of the existing medical facility, there is a rectangular section of the disturbed land cover in which trees and shrubs are dominant during the wet season, and prior to weed management activities. Weed maintenance, including disking and mowing, is conducted at least annually throughout the disturbed land cover area, such that all vegetation, except for a couple trees near the northeast corner of the project site, is cut down to less than one foot in height during the dry season.

Weed abatement activities such as disking and mowing throughout vegetated areas of the disturbed land cover adversely affect habitat value by reducing vegetative cover. Disturbed land cover within the BSA does not fit any classification described in *A Manual of California Vegetation Second Edition* (Sawyer et al., 2009) or *Preliminary Descriptions of the Terrestrial Communities of California* (Holland, 1986). Disturbed land cover is not considered a sensitive habitat or Natural Community of Special Concern (CDFW, 2024a). Disturbed land cover occupies the majority of the project site and less than 50 percent of the BSA.

Based on the results of the literature review and desktop study, the BSA does not support riparian habitat or other sensitive natural communities; however, a Reconnaissance-Level Biological Survey will be conducted and the results of that survey including the presence of and potential impacts to riparian habitat or other sensitive natural communities will be discussed in the forthcoming PEIR.

c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Potentially Significant Impact

Based on the results of the desktop study, the project site may contain waters of the U.S. and State. A Reconnaissance-Level Biological Survey will be conducted and based on the results of that survey, the presence of and potential impacts to waters of the U.S. and State, including wetlands, will be discussed in the PEIR.

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

Less Than Significant Impact

Wildlife corridors generally contain biological and physical features that are needed to temporarily support wildlife and allow avian and ground-dwelling wildlife to safely move through it. Wildlife corridors may either be contiguous strips of vegetation and habitat, such as ridgelines or riverbeds, or intermittent patches of habitat or physical features spaced closely enough to allow safe travel. Corridors can be natural, such as a riparian corridor, or man-made, such as culverts, tunnels, drainage pipes, walls, underpasses, overpasses, or streets. Man-made corridors are often referred to as *wildlife crossings* or *local corridors*, and they allow wildlife to pass over, under, or through physical barriers that otherwise hinder movement. Wildlife corridors also vary greatly in size, shape, and composition.

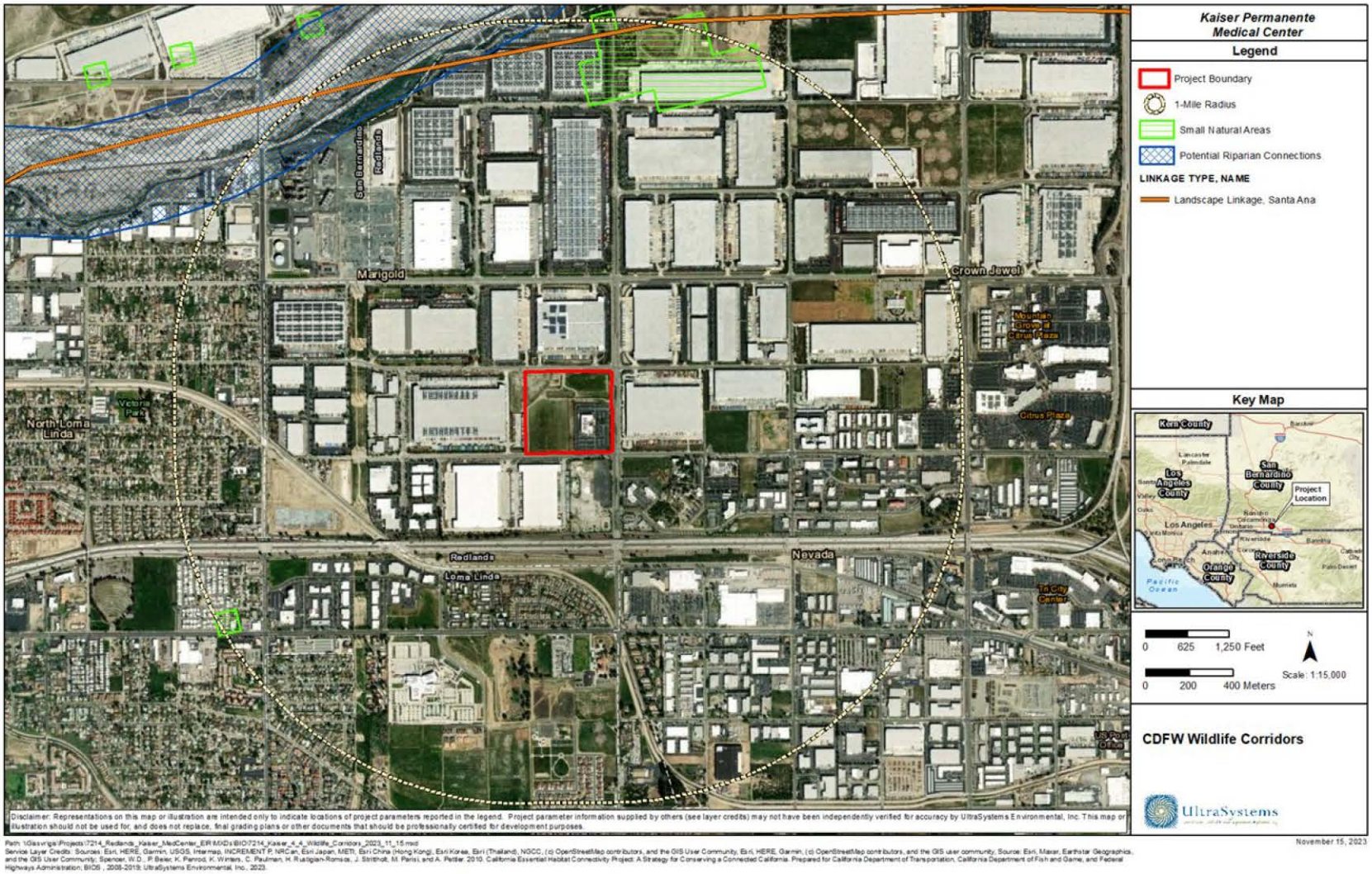
Predators (e.g., coyotes) and smaller mammals (e.g., raccoons [*Procyon lotor*] and striped skunks [*Mephitis mephitis*]) are known to use medium- to low-density residential neighborhoods, commercial areas, golf courses, and vacant land for hunting and foraging, using washes (natural and channelized), culverts, underpasses, and city streets for travelling, often but not necessarily limited to overnight hours when human activity decreases (Baker and Timm, 1998; Grubbs and Krausman, 2009; Ng et. al., 2004). Urban areas provide a unique ecosystem with ecological opportunity in the form of anthropogenic food sources such as discarded human food, pet food, human-associated fruits, and domestic animals (Larson et. al., 2020).

The Santa Ana River, one mile north of the project site, is a potential riparian corridor (see **Figure 4.4-4**) allowing for movement of wildlife species into areas bordering the Santa Ana River. There are many small natural landscape blocks, such as school grounds, parks, and airports within the project vicinity that would remain as local movement corridors after development of the project.

The project site does not contain native wildlife nursery sites.

The project would not interfere substantially with or impede: (1) the movement of any resident or migratory fish or wildlife species; (2) established resident or migratory wildlife corridors; or (3) the use of wildlife nursery sites. Therefore, the project would have less than significant impact to native wildlife movement, native wildlife corridors, and native wildlife nursery sites. This threshold will not be analyzed further in the PEIR.

Figure 4.4-4
CDFW WILDLIFE CORRIDORS



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

Potentially Significant Impact

All trees meeting the definition of native or specimen trees in § 12.52.020 of Chapter 12.52, *Trees and Tree Protection Along Streets and in Public Places* (City of Redlands Tree Ordinance), are subject to the protections of the City Tree Ordinance. Chapter 12.52 Section 12.52.020, *Definitions,* defines *landmark trees* in the City Tree Ordinance (City of Redlands, 2004) as:

> *"a public tree designated as a historic resource under chapter 2.62 of this code as a tree of historic or cultural significance and of importance to the community due to any of the following factors: it is one of the largest or oldest public trees of the species located in the city, it has historical significance due to an association with a historic building, site, street, person or event, or it is a significant outstanding feature of a neighborhood. "*

Native tree is defined as:

> *Any tree, identified by a certified arborist as native to the local area, with a trunk more than eight inches (8") in diameter at a height of four and one-half feet (41/2') above natural grade that is identified on a list of native trees approved by the city council.*
>
> *"Any tree, identified by a certified arborist as native to the local area, with a trunk more than eight inches (8") in diameter at a height of four and one-half feet (41/2') above natural grade that is identified on a list of native trees approved by the city council."*

No onsite tree assessment has been conducted of the project site. However, available online images of the street trees on the project site do not indicate the presence of native trees. Street tree species that were identified during the desktop review include the following non-native ornamental tree species: Callery pear (*Pyrus calleryana*), Mexican fan palm (*Washingtonia robusta*), a winter deciduous small tree, and other ornamental tree species. Based on the desktop review, it is unlikely that any of the street trees bordering the project site are protected under the City Tree Ordinance.

Further investigation is required to determine if the project site contains trees that qualify for protection under the City Tree Ordinance (City of Redlands, 2004). A Reconnaissance-Level Biological Survey will be conducted and the results of that survey including the potential impacts to trees will be discussed in the forthcoming PEIR.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact

The project site is not within adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan (CDFW, 2024a). No conflicts with such plans are anticipated and there would be no impact in this regard. This will not be analyzed further in the PEIR.

4.5 Cultural Resources

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in § 15064.5?	**X**			
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	**X**			
c) Disturb any human remains, including those interred outside of formal cemeteries?	**X**			

A draft Cultural Resources Inventory Report was prepared in October 2024 for the City of Redlands Kaiser Permanente Medical Center Project and will be included in the Project's PEIR. Information from the draft report is presented here (**Appendix B**).

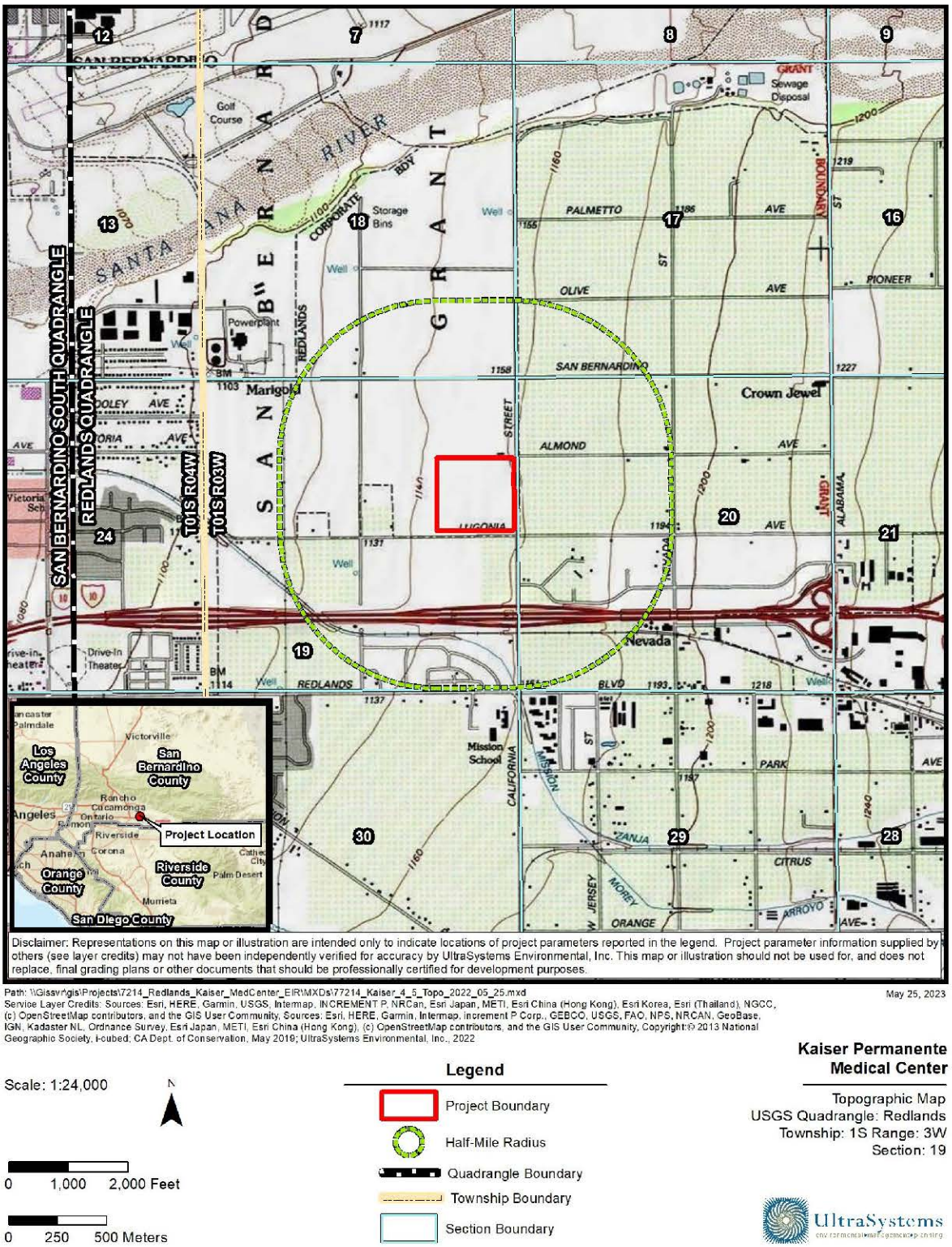
4.5.1 Methodology

The Cultural Resources Inventory Report for the City of Redlands Kaiser Permanente Medical Center Project site (**Figure 4.5-1,** *Topographic Map*) will include background information gathered from a California Historic Resources Inventory System (CHRIS) records and literature search at the South Central Coastal Information Center (SCCIC) located at the California University Fullerton that includes the Area of Potential Effect (APE) encompassing the project boundary, as well as a 0.5-mile buffer surrounding the APE. A request was made to the Native American Heritage Commission (NAHC) on June 8, 2023 to conduct a search of their Sacred Lands File (SLF) for potential traditional cultural properties as well as to provide a list of local Native American tribal organizations to contact, following which outreach letters will be sent to the listed tribes. The NAHC replied on July 13, 2023 noting a positive response to the SLF search and with a list of 38 Tribes and Native American contacts to contact. Outreach letters were sent to the tribes on October 3, 2023. A pedestrian field survey of the project site was conducted for this project on November 6, 2023.

4.5.2 Existing Conditions

A cultural resources records search was conducted at the SCCIC, the local California Historical Resources Information System facility, on June 22, 2023. No prehistoric and two historic cultural resource sites are documented within the APE; there are an additional six historic sites recorded in the 0.5-mile buffer area. There were 17 previous cultural resource studies within portions of the 0.5-mile buffer of the project. Two of the surveys included the project site (SB-2625 and SB-4809), while four other surveys touched upon the boundaries of the project site (SB-2853, - 4600, - 8038, and - 8199). The remaining 11 prior studies are located outside of the project boundary. These resources and reports will be described in the PEIR to be prepared for the project.

Figure 4.5-1
TOPOGRAPHIC MAP



4.5.3 Impact Analysis

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to in § 15064.5?

Potentially Significant Impact

A historical resource is defined in § 15064.5(a)(3) of the *CEQA Guidelines* as any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Historical resources are further defined as being associated with significant events, important persons, or distinctive characteristics of a type, period or method of construction; representing the work of an important creative individual; or possessing high artistic values. Resources listed in or determined eligible for the California Register, included in a local register, or identified as significant in a historic resource survey are also considered as historical resources under CEQA.

Similarly, the National Register criteria (contained in Code of Federal Regulations Title 36 Section 60.4) are used to evaluate resources when complying with Section 106 of the National Historic Preservation Act. Specifically, the National Register criteria state that eligible resources comprise districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and that (a) are associated with events that have made a significant contribution to the broad patterns of our history; or (b) that are associated with the lives of persons significant in our past; or (c) that embody the distinctive characteristics of a type, period, or method of construction, or that possess high artistic values, or that represent a significant distinguishable entity whose components may lack individual distinction; or (d) that have yielded or may be likely to yield, information important to history or prehistory.

A substantial adverse change in the significance of an historical resource, as a result of a project or development, is considered a significant impact on the environment. Substantial adverse change is defined as physical demolition, relocation, or alteration of a resource or its immediate surroundings such that the significance of the historical resource would be materially impaired. Direct impacts are those that cause substantial adverse physical change to a historic property. Indirect impacts are those that cause substantial adverse change to the immediate surroundings of a historic property, such that the significance of a historical resource would be materially impaired.

It was determined that the Kaiser Permanente Medical Center Project site had two historic era cultural resources that were previously recorded within the project site boundary. Within the 0.5-mile buffer zone there are an additional five recorded historic-era cultural resources.

The two historic sites, both related to the Marigold Farms, were situated in the northeast area of the project site. These were recorded as the Marigold Farms complex (CA-BSR-7139H) and an associated barn (P-36-6875). The report concluded that the site record produced mitigated potential impacts of development to the farm, and both structures were subsequently demolished.

Background information on these structures will be presented in the PEIR through the Cultural Resources Inventory Report. This topic will be discussed further in the PEIR, and potential mitigation measures will be provided there.

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

Potentially Significant Impact

An archaeological resource is defined in § 15064.5(c) of the CEQA Guidelines as a site, area or place determined to be historically significant as defined in § 15064(a) of the CEQA Guidelines, or as a unique archaeological resource defined in § 21083.2 of the Public Resources Code as an artifact, object, or site that contains information needed to answer important scientific research questions of public interest or that has a special and particular quality such as being the oldest or best example of its type, or that is directly associated with a scientifically-recognized important prehistoric or historic event or person.

Based on the cultural resources records search conducted by the SCCIC, it was determined that there have been no prehistoric resources recorded within the project boundary or within the 0.5-mile-buffer area.

A pedestrian survey was conducted on November 6, 2023, which consisted of walking over, visually inspecting, and photographing the exposed ground surface of the project site using standard archaeological procedures and techniques. No prehistoric or historic features or isolate artifacts were observed. However, given the poor surface visibility during the survey it cannot be ruled out that cultural resources may be present.

Therefore, further and more detailed analysis of this issue is warranted and will be undertaken in the PEIR to be prepared for the proposed project. Potential mitigation measures will be provided in the PEIR to preserve and/or record prehistoric and historic sites and structures.

c) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Potentially Significant Impact

No human remains have been previously identified or recorded on the Kaiser Permanente Medical Center Project site.

Grading and trenching activities associated with installation of infrastructure including water, sewer, and utility lines; and for construction of proposed buildings of the project. Grading would involve new subsurface disturbance and could result in the unanticipated discovery of unknown human remains, including those interred outside of formal cemeteries. Therefore, further and more detailed analysis of this issue is warranted and will be undertaken in the PEIR to be prepared for the proposed project. A mitigation measure will be provided there in conformity with California Health and Safety Code § 7050.5, CEQA § 15064.5, and California Public Resources Code § 5097.98.

4.6 Energy

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

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

Potentially Significant Impact

Project construction and operation would consume energy. Sources of energy for these activities would include electricity, natural gas, and transportation fuels such as diesel and gasoline. During project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Project construction would also consume fuels for transportation (delivery and haul truck trips and construction worker commute trips) and for offroad construction vehicles and equipment on the project site. During operation of the project, energy use would include, but not be limited to, heating, ventilating, and air conditioning (HVAC); lighting; and the use of appliances and electronics. Energy would also be consumed during project operations related to the central utility plant, water usage, solid waste disposal, and vehicle trips. In addition, the project could result in a significant impact to state or local plans for renewable energy or energy efficiency if it failed to meet energy efficiency standards or prevented energy suppliers from meeting renewable energy source targets. Therefore, further and more detailed analysis of this issue is warranted and will be included in the PEIR to be prepared for the proposed project.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Potentially Significant Impact

Energy use during project construction and operation will be estimated and discussed in the PEIR. Estimated energy use will be compared to energy efficiency metrics set forth in state laws and regulations, and energy efficiency and renewable energy goals, measures, and actions set forth in the Sustainable Community Element in the City of Redlands General Plan 2035 (City of Redlands, 2017a), to evaluate whether project energy use would be wasteful, inefficient, or unnecessary. Project compliance with state laws and regulations respecting energy efficiency and renewable energy, and the City of Redlands General Plan 2035, will be evaluated in the PEIR.

4.7 Geology and Soils

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	**X**			
ii) Strong seismic ground shaking?	**X**			
iii) Seismic-related ground failure, including liquefaction?	**X**			
iv) Landslides?	**X**			
b) Result in substantial soil erosion or the loss of topsoil?	**X**			
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?	**X**			
d) Be located on expansive soil, as defined in Table 18-1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	**X**			
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				**X**
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	**X**			

a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Potentially Significant Impact

The Alquist-Priolo Zones Special Studies Act defines active faults as those that have experienced surface displacement or movement during the last 11,000 years. There are no mapped Alquist-Priolo Earthquake Fault Zones that pass through or near the proposed project site. The nearest Alquist-Priolo Earthquake Fault Zones are the Claremont and San Jacinto Faults, located approximately 2.5 miles to the southwest of the proposed project as shown in **Figure 4.7-1.** A geotechnical investigation report for the proposed project is currently in preparation and will assess hazards from surface rupture of known active faults. The findings of the geotechnical investigation report related to this topic will be included in the PEIR to be prepared for the project.

ii) Strong seismic ground shaking?

Potentially Significant Impact

As shown in **Figure 4.7-2**, the project is located approximately two miles northwest of the San Jacinto Fault. Southern California is historically a seismically active region, and all structures in the region are susceptible to collapse, wall buckling, and foundation damage due to strong seismic ground shaking.

The geotechnical investigation report for the project will calculate the seismic design parameters to be used in the design and construction of the buildings to be constructed under the proposed project. Hazards from strong ground shaking, along with regulatory requirements governing seismic safety in the design and construction of buildings, will be discussed in the PEIR to be prepared for the project.

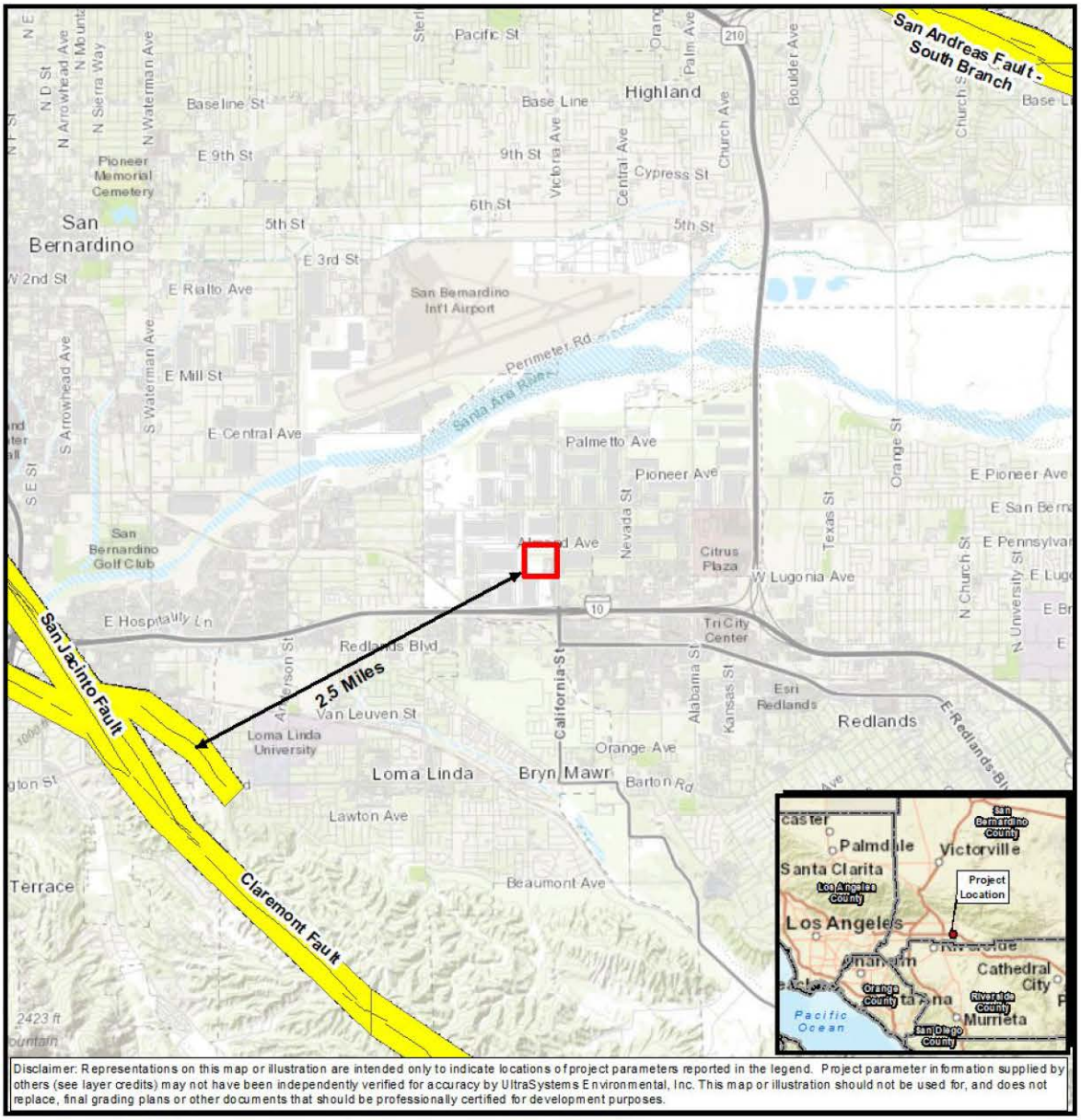
iii) Seismic-related ground failure, including liquefaction?

Potentially Significant Impact

General types of ground failures that can occur as a result of severe ground shaking typically include landslides, ground subsidence, ground lurching, and shallow ground rupture. The probability of the occurrence of each type of ground failure depends on the severity of the earthquake, the distance from the faults, the topography, subsoils, and relatively shallow groundwater tables (approximately 50 feet or less below ground surface), in addition to other factors.

Liquefaction typically occurs when saturated or partially saturated soils behave like a liquid, as a result of losses in strength and stiffness in response to applied stress caused by shaking of the ground or other sudden changes in stress conditions. The project site is mapped as an unevaluated area for liquefaction, as shown in **Figure 4.7-3**. The geotechnical investigation report in preparation will assess the hazards of liquefaction in relation to the proposed project. Therefore, further and more detailed analysis of this issue is warranted and will be undertaken in the PEIR to be prepared for the proposed project.

Figure 4.7-1
ALQUIST PRIOLO FAULT ZONES



Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

Path: \\Gissvr\gis\Projects\7214_Redlands_Kaiser_MedCenter_EIR\MXDs\7214_Kaiser_4_7_Alquist_Priolo_2023_11_15.mxd November 15, 2023

Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community, Seismic Hazards Program, California Geological Survey, California Department of Conservation, Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community; CA Dept. of Conservation, 2017; UltraSystems Environmental, Inc., 2023.

Scale: 1:63,360

N

0 0.5 1 Miles

0 0.5 1 Kilometers

Legend

Alquist Priolo Potentially Active Fault

Project Boundary

Alquist Priolo Special Study Zone Boundary

Kaiser Permanente Medical Center

Alquist Priolo Earthquake Fault Zones

UltraSystems

Figure 4.7-2
REGIONALLY ACTIVE FAULTS

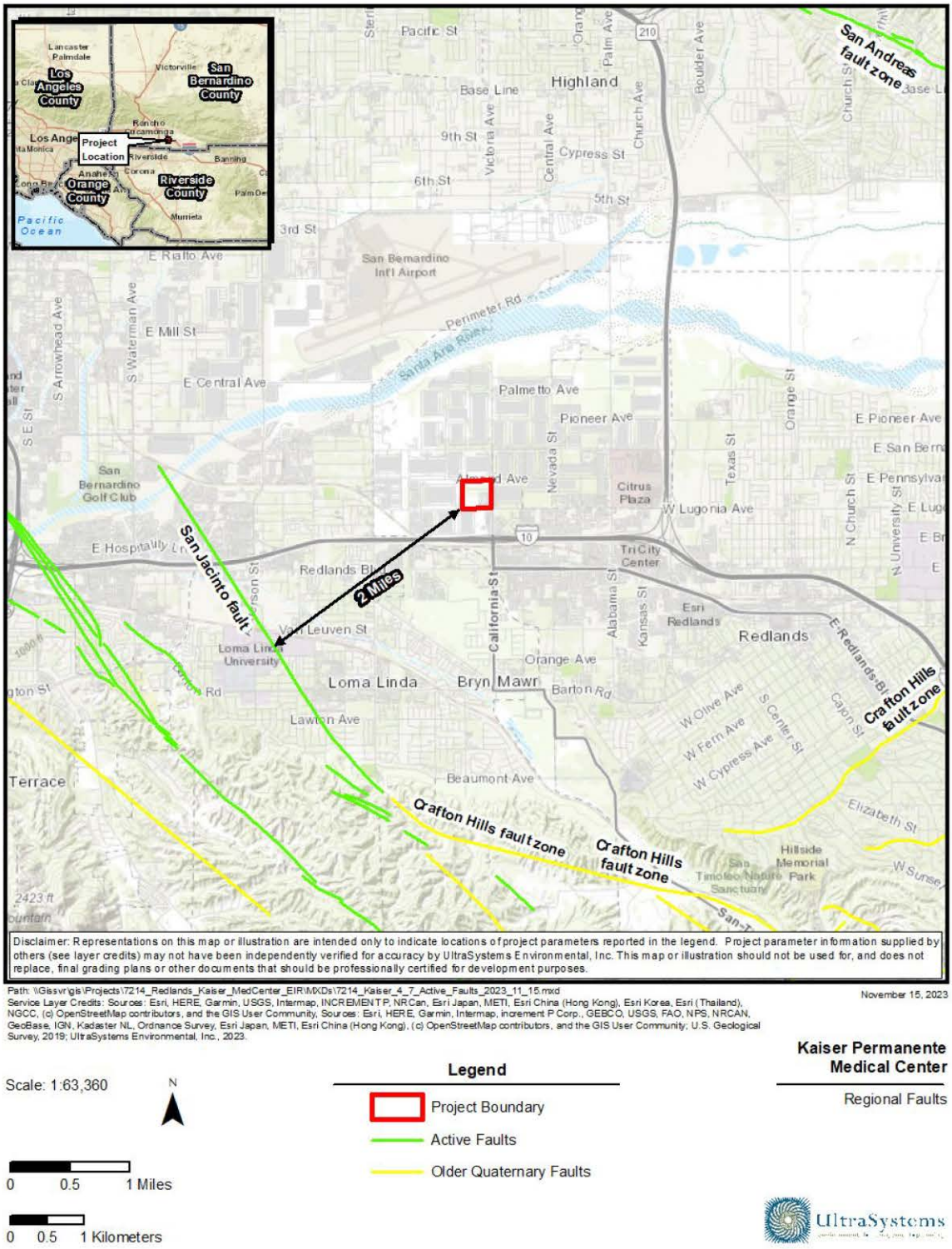
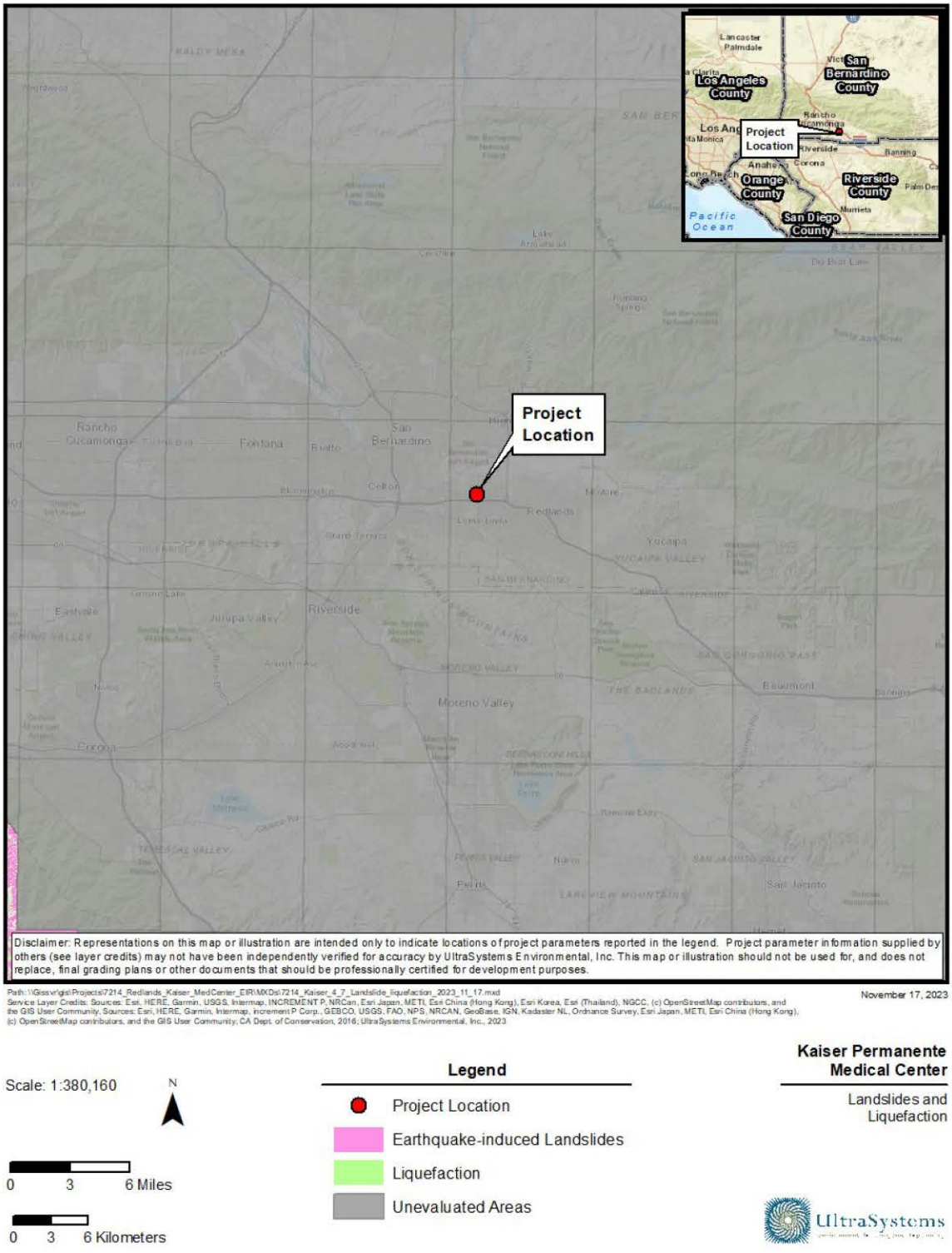


Figure 4.7-3
LANDSLIDES AND LIQUEFACTION



iv) Landslides?

Potentially Significant Impact

Landslides occur when the stability of the slope changes from stable to unstable condition. A change in the stability of a slope can be caused by several factors, acting together or alone. Natural causes of landslides include groundwater pressure (pore water) that acts to destabilize the slope; loss of vegetative structure; erosion of the toe of a slope by rivers or ocean waves; weakening of a slope through saturation by snow melt or heavy rains; earthquakes that add loads to a barely stable slope; earthquake-caused liquefaction that destabilizes slopes; and volcanic eruptions.

Seismically induced landslides and other slope failures are common occurrences during or soon after earthquakes; however, the project site is located on the relatively open flats of the San Bernardino Valley. The potential for the development of the project to be impacted by seismically induced landslide hazards is relatively low. However, the geotechnical investigation report will assess whether the development of the project could potentially exacerbate the hazards of landslides. Therefore, further and more detailed analysis of this issue is warranted and will be undertaken in the PEIR to be prepared for the proposed project.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Potentially Significant Impact

The project site would be most susceptible to erosion during the construction phase when the soil is exposed and before landscaped areas have been installed. To minimize the potential for water and wind erosion, the project would adopt construction best management practices (BMPs) in accordance with the Statewide General Construction Permit issued by the State Water Resources Control Board. The impacts of project erosion, and the requirements of the state-wide general construction permit, will be discussed in the PEIR to be prepared for the proposed project.

c) Would the project 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?

Potentially Significant Impact

Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The downslope movement is due to gravity and earthquake shaking combined. Collapsible soils shrink when wetted and / or subject to a load. The main cause of ground subsidence is excessive groundwater withdrawal. The geotechnical investigation report of the project will assess the suitability of the soils on site to support proposed buildings and other improvements and the hazards of unstable soils on site. Therefore, further and more detailed analysis of this issue is warranted and will be undertaken in the PEIR to be prepared for the proposed project.

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

Potentially Significant Impact

Expansive soils shrink and swell with changes in soil moisture. Soil moisture can change from landscape irrigation, rainfall, and utility leakage. The project geotechnical investigation will include testing subsurface soil samples for expansion potential. The geotechnical investigation report will provide any recommendations needed to minimize hazards from expansive soils. Therefore, further and more detailed analysis of this issue is warranted and will be undertaken in the PEIR to be prepared for the proposed project.

e) Would the project 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 waste water?

No Impact

The project site would connect to the local sewer system and would not use septic tanks or alternative wastewater disposal systems. Therefore, no impacts associated with septic tanks or alternative wastewater disposal systems would occur.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Impact

Excavation and grading for the construction of buildings and other improvements could damage fossils that may be present in the soils of the site. A paleontological resource records search will be conducted at the San Bernardino County Museum and the Western Science Center in Hemet. More detailed analysis of this issue is warranted based on the anticipated(?) findings of the record search and will be undertaken in the PEIR to be prepared for the proposed project.

4.8 Greenhouse Gas Emissions

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	**X**			
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	**X**			

Life on Earth relies on solar energy, with about half of the sunlight passing through the atmosphere to reach the surface, where it is absorbed and re-radiated as infrared heat. Around 90 percent of this heat is trapped by greenhouse gases (GHGs), including carbon dioxide (CO_2), which warm the surface to a life-supporting average temperature of 59°F (NASA, 2024). However, human activities, particularly burning fossil fuels like coal and oil, have disrupted this natural greenhouse effect by increasing CO_2 levels. Fossil fuel combustion combines carbon in the fuel with oxygen from the air to produce CO_2, while deforestation and land-use changes for agriculture and industry have further raised GHG concentrations (NASA, 2024). GHGs, as defined under the California Global Warming Solutions Act of 2006, include CO_2, methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6) (AB 32, chapter 488). The project under consideration will focus on CO_2, CH_4, and N_2O due to their global warming potentials (GWPs) of 1, 25, and 298, respectively (GMI, 2022). Emissions of these gases are expressed as carbon dioxide equivalent (CO_2e) to reflect their varying heat-trapping abilities.

a) Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Potentially Significant Impact

Direct greenhouse gas emissions (GHG) emissions include emissions from construction activities, stationary sources, and mobile (vehicle) sources. Typically, mobile sources make up the majority of direct emissions. Indirect GHG emissions are generated by incremental electricity consumption and waste generation. Project implementation would increase GHG emissions from mobile sources, electricity usage, natural gas consumption, solid waste generation, and water use. Therefore, further and more detailed analysis of this issue is warranted and will be included in the PEIR to be prepared for the proposed project.

b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHG?

Potentially Significant Impact

The City of Redlands Climate Action Plan (CAP), which sets a goal of reducing the City's annual per capita GHG emissions by 5.0 $MTCO_2e$, sets forth strategies for working toward that goal (City of Redlands, 2017d). Project compliance with federal and state plans, policies, and regulations governing GHG emissions, and the CAP, will be evaluated in the PEIR to be prepared for the proposed project.

4.9 Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	**X**			
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	**X**			
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one quarter mile of an existing or proposed school?				**X**
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?	**X**			
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?				**X**
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			**X**	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			**X**	

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

Potentially Significant Impact

Construction

Project construction would involve the use of hazardous materials such as fuels, oils and other lubricants, degreasers, paints, pesticides, and fertilizers. Hazardous materials use would be conducted in compliance with existing regulations of several agencies including the US Environmental Protection Agency, Department of Toxic Substances Control, US Department of Transportation, and San Bernardino County Environmental Health Services.

The project appears to have been in agricultural use from at least 1938 through at least 2005; the medical office building currently in the southeast corner of the project site first appears in a 2009 aerial photograph. Residues from pesticides remaining from past agricultural use could be present in site soils. Project grading and construction activities might disturb such residues. This impact is potentially significant.

Operation

Project operation would generate medical waste. The San Bernardino County Department of Public Health, Division of Environmental Health Services (EHS) regulates medical waste generators, transporters, transfer stations, and treatment facilities within the County under the authority of the Medical Waste Management Act (California Health and Safety Code §§ 117600 et seq.). Medical waste generators producing 200 pounds or more of medical waste per month are classified as Large Quantity Generators (LQGs), who must obtain a permit from EHS. It is expected that the proposed project would be an LQG by the time the medical office building proposed in Phase 1 (165,000 square feet) was completed and operating. The Medical Waste Management Act sets forth requirements governing containment and storage, transport, and treatment of medical wastes. LQGs, medical waste haulers, and treatment facilities are required to register or obtain permits from EHS (EHS, 2023). Eight medical waste transporters located in San Bernardino County are currently registered with the California Department of Public Health (CDPH, 2023a). The CDPH lists one medical waste transfer station, and one medical waste treatment facility, in San Bernardino County (CDPH, 2023b).

State regulations governing medical waste are also issued and enforced by the California Division of Occupational Safety and Health (DOSH) and Caltrans. Federal regulations governing medical waste are also issued and enforced by Occupational Safety and Health Administration and the Centers for Disease Control and Prevention. Operational impacts respecting hazardous materials would be potentially significant.

A Phase I Environmental Site Assessment (ESA) for the project site is currently in preparation. Further analysis of this topic is warranted. The methods and findings of the Phase 1 ESA and project impacts related to transport, use and disposal of hazardous materials during construction and operation will be addressed in the PEIR to be prepared for the proposed project.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Potentially Significant Impact

Construction

Project construction would involve transport, storage, and use of chemical agents, solvents, paints, and other hazardous materials commonly associated with construction activities. Chemical transport, storage, and use would comply with Resource Conservation and Recovery Act (RCRA); Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); Occupational Safety and Health Administration (OSHA); California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5, Hazardous Waste Control); California Division of Safety and Health (DOSH); South Coast Air Quality Management District (SCAQMD); and San

Bernardino County Fire Department (SBCFD) requirements.[8] The SBCFD provides emergency responses for hazardous materials releases. The construction contractor would maintain equipment and supplies onsite for containing and cleaning up small spills of hazardous materials, and in the event of a release of hazardous materials of quantity and/or toxicity that onsite workers could not safely contain and clean up, would notify the SBCFD immediately. Therefore, compliance with applicable laws and regulations during project construction would reduce the potential for accidental releases of hazardous materials, and construction hazards impacts would be less than significant.

Operation

Project operation would generate hazardous materials from uses such as medical waste and maintenance and repair of equipment as needed. Operational impacts respecting hazardous materials would be potentially significant.

Further and more detailed analysis of this topic is warranted. Potential hazards related to accidental releases of hazardous materials during project operation will be addressed in the PEIR to be prepared for the proposed project.

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

No Impact

No schools are within 0.25 mile of the project site (Greeninfo Network, 2023), and thus project development would not subject people on school campuses within 0.25 mile of the project site to hazards through handling hazardous materials or emitting hazardous emissions. No impact would occur.

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

Potentially Significant Impact

Government Code § 65962.5 requires the Department of Toxic Substances Control (DTSC) to compile and update, at least annually, lists of the following:

- Hazardous waste and substances sites from the DTSC EnviroStor database.
- Leaking Underground Storage Tank (LUST) sites by county and fiscal year in the State Water Resources Control Board (SWRCB) GeoTracker database.
- Solid waste disposal sites identified by SWRCB with waste constituents above hazardous waste levels outside waste management units.
- SWRCB Cease and Desist Orders (CDOs), and Cleanup and Abatement Orders (CAOs).

[8] San Bernardino County Fire Department (SBCFD) is the Certified Unified Program Agency (CUPA) for San Bernardino County; the Certified Unified Program coordinates and makes consistent enforcement of several state and federal regulations governing hazardous materials.

- Hazardous waste facilities subject to corrective action pursuant to § 25187.5 of the Health and Safety Code, identified by DTSC.

These lists are collectively referred to as the "Cortese List."

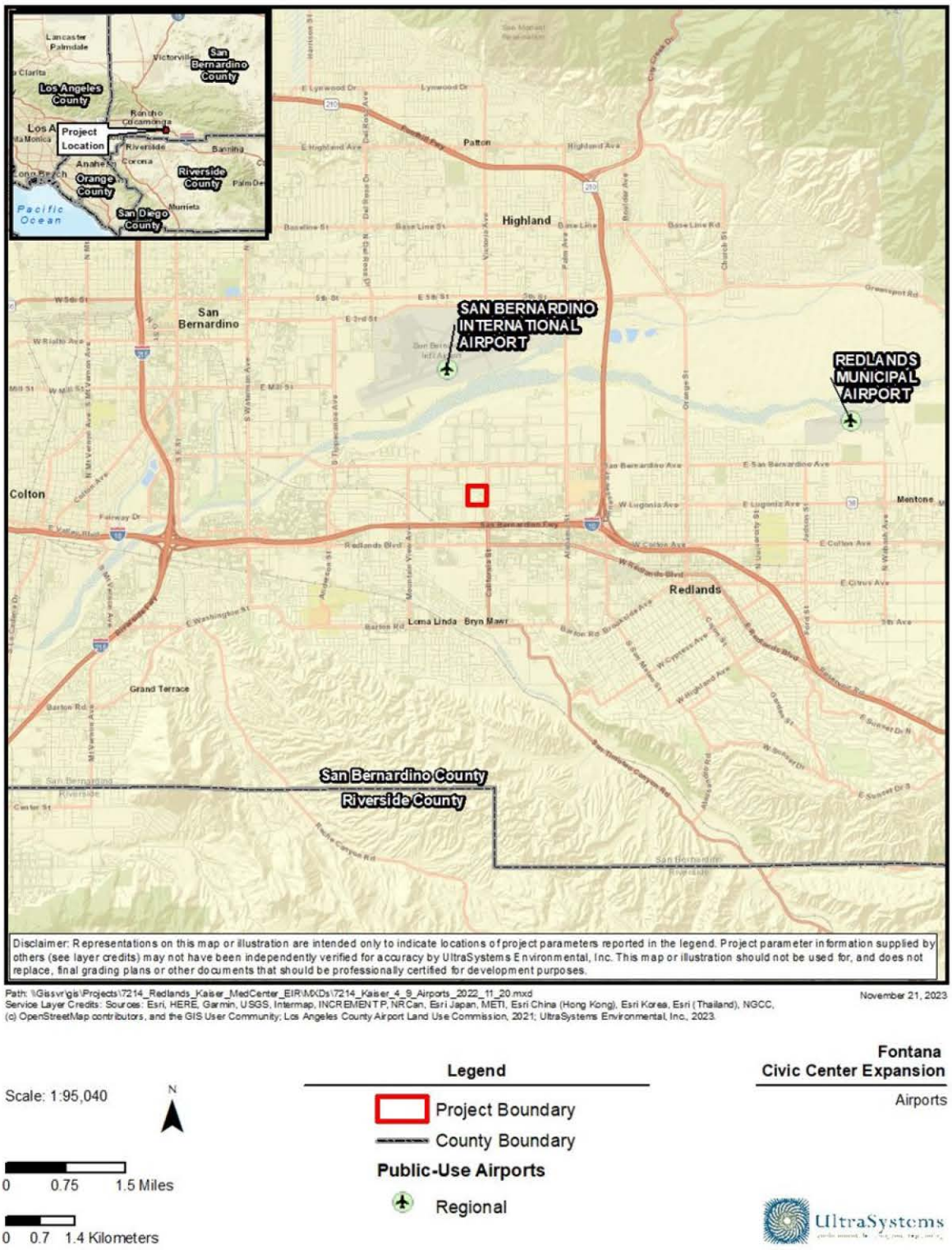
A Phase I Environmental Site Assessment (ESA) for the project site is currently in preparation and will include details about known Cortese List sites on or near the project site. Further analysis of this topic is warranted. The methods and findings of the Phase 1 ESA and hazardous materials related project impacts will be addressed further in the PEIR to be prepared for the proposed project.

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?

No Impact

As shown in **Figure 4.9-1**, The nearest public-use airport to the project site is San Bernardino International Airport (SBIA) approximately 1.3 miles to the north. The project site is outside of noise contours for SBIA. The San Bernardino International Airport Authority Airport Layout Plan Narrative Report does not designate zones surrounding SBIA where land uses are regulated to minimize aviation-related hazards to persons on the ground (SBIAA, 2010). Project development would not cause airport-related hazards, or excessive noise, to people occupying the project site. No impacts would occur, and no mitigation is required. This topic will not be discussed further in the PEIR to be prepared for the project.

Figure 4.9-1
AIRPORTS IN THE PROJECT REGION



f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact

Construction

The City of Redlands Local Hazard Mitigation Plan (LHMP) was adopted by the City Council in 2021. California Street and Lugonia Avenue are both classified as Major Arterials in the City of Redlands General Plan (City of Redlands, 2017a). While the LHMP does not specify evacuation routes, it is assumed here that California Street and Lugonia Avenue would both be used as evacuation and/or emergency response routes due to their classifications. Project construction could temporarily reduce the number of lanes or temporarily close portions of California Street and Lugonia Avenue. The City requires that projects conducting construction work in City right-of-way (ROW) obtain encroachment permits approved by the City Municipal Utilities & Engineering Department. Compliance with City requirements for traffic management during construction in the public ROW would ensure that the project would have a less than significant impact. This topic will not be analyzed further in the PEIR.

Operation

Development of a 400,000-square-foot hospital in Phase 2 of the project, along with a potential 180,000 square-foot expansion of the hospital in Phase 4 of the project, would have some favorable impact on emergency response capacity in Redlands. Project operation would not block traffic on California Street or Lugonia Avenue. The project would provide emergency access to proposed new buildings compliant with California Fire Code § 503. Therefore, impacts would be less than significant. This topic will not be analyzed further in the PEIR to be prepared for the project.

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

Less than Significant Impact

The California Department of Forestry and Fire Protection (CAL FIRE) developed Fire Hazard Severity Zones (FHSZ) for State Responsibility Areas (SRA) and Local Responsibility Areas (LRA). The State is responsible for the costs of wildfire prevention and suppression in SRAs, and local governments are responsible for the same costs in LRAs.

Very High Fire Hazard Severity Zone (VHFHSZ) designation refers to either:

h) Wildland areas supporting high-to-extreme fire behavior resulting from climax fuels typified by well-developed surface fuel profiles (e.g., mature chaparral) or forested systems where crown fire is likely. Additional site elements include steep and mixed topography and climate/fire weather patterns that include seasonal extreme weather conditions of strong winds and dry fuel moistures. Burn frequency is typically high, and should be evidenced by numerous historical large fires in the area. Firebrands from both short- (<200 yards) and long-range sources are often abundant.

OR

i) developed/urban areas typically with high vegetation density (>70% cover) and associated high fuel continuity, allowing for frontal flame spread over much of the area to progress impeded by only isolated non-burnable fractions. Often where tree cover is abundant, these areas look very similar to adjacent wildland areas. Developed areas may have less vegetation cover and still be in this class when in the immediate vicinity (0.25 mile) of wildland areas zoned as Very High (see above).

The nearest FHSZ to the project site is a VHFHSZ in LRA about 2.3 miles to the south, as shown in **Figure 4.20-1** in **Section 4.20,** *Wildfire*, of this document. The nearest FHSZ in SRA is about 3.5 miles to the south; see **Figure 4.20-2**. The project site is surrounded by built-out urban uses. Therefore, project development would not exacerbate wildfire risks, and impacts would be less than significant. This topic will not be addressed in the PEIR to be prepared for the project.

4.10 Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			**X**	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	**X**			
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 offsite;			**X**	
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			**X**	
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			**X**	
iv) impede or redirect flood flows?			**X**	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				**X**
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			**X**	

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less than Significant Impact

The project site is approximately 1.1 miles south of the Santa Ana River and 0.35 mile north of Mission Wash, which discharges into the Santa Ana River. The Santa Ana River ultimately discharges into the Pacific Ocean near Huntington State Beach (see **Figure 4.10-1**). The California State Water Resources Control Board requires its nine Regional Water Quality Control Boards (RWQCBs) to develop water quality control plans (Basin Plans) designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, Basin Plans designate beneficial uses for surface waters and groundwater, set narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State antidegradation policy, and describe implementation programs to protect all waters in the Regions (Los Angeles RWQCB, 2019). In addition, Basin Plans incorporate by reference all applicable State and Regional Board plans and policies, and other pertinent water quality policies and regulations. The proposed project is under the jurisdiction of the Santa Ana RWQCB (Region 8).

Project development could cause two types of water quality impacts: (1) short-term construction impacts; and (2) long-term operational impacts. Temporary soil disturbance would occur during project construction, due to earth-moving activities such as excavation and trenching for foundations and utilities, soil compaction and moving, cut and fill activities, and grading. Disturbed soils are susceptible to high rates of erosion from wind and rain, resulting in sediment transport via stormwater runoff from the project area. Erosion and sedimentation affect water quality of receiving waters through interference with photosynthesis, oxygen exchange, and respiration, growth, and reproduction of aquatic species. Runoff from construction sites may include sediments and contaminants such as oils, fuels, paints, and solvents. Additionally, other pollutants such as nutrients, trace metals, and hydrocarbons can attach to sediment and be carried by stormwater into storm drains which discharge eventually to the Pacific Ocean.

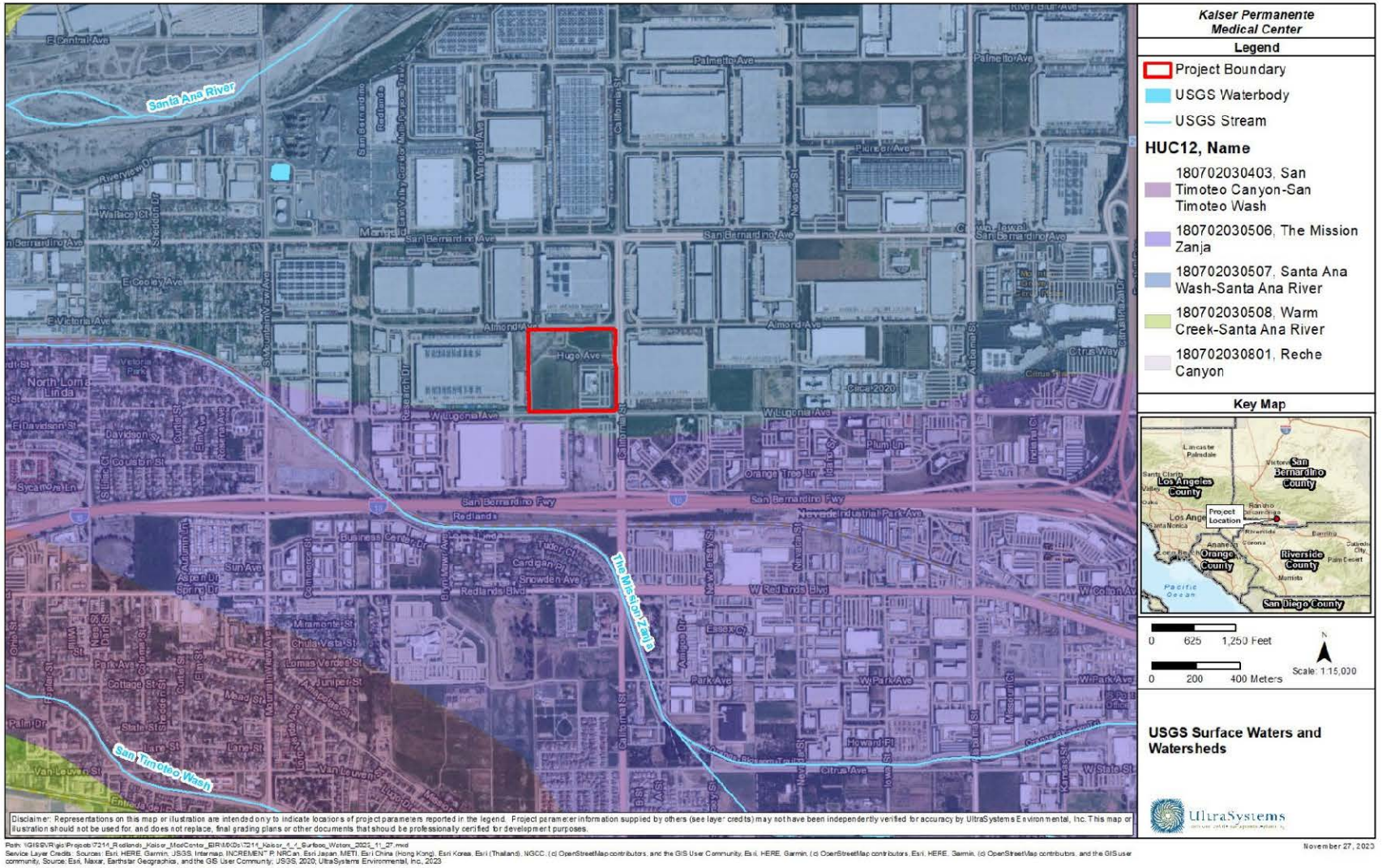
Spills and mishandling of construction materials and waste may also potentially leave the project site and negatively impact water quality. The use of construction equipment and machinery may potentially result in contamination from petroleum products, hydraulic fluids, and heavy metals. Contamination from building preparation materials such as paints and solvents, and landscaping materials such as fertilizers, pesticides, and herbicides may also potentially degrade water quality during project construction. Trash and demolition debris may also be carried into storm drains and discharged into receiving waters.

Construction (Phase I) Pollutant Controls

The project owner would be required by the California State Water Resources Control Board (SWRCB) to obtain coverage under a National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (General Permit; Order No. 2022-0057-DWQ, NPDES No. CAS000002). The General Permit regulates discharges to waters of the U.S. from stormwater and authorized non-stormwater associated with construction activity from sites that disturb one or more acres of land.

The General Permit requires potential dischargers of pollutants into waters of the U.S. to prepare a site-specific Stormwater Pollution Prevention Plan (SWPPP), which establishes enforceable limits on discharges, requires effluent monitoring, designates reporting requirements, and requires construction best management practices (BMPs) to reduce or eliminate point and non-point source discharges of pollutants, including sediment resulting from wind or erosion.

Figure 4.10-1
SURFACE WATERS



A Preliminary Water Quality Management Plan (WQMP) was prepared for this project by Michael Baker International (MBI) dated July 24, 2024. This WQMP is included in **Appendix C**.

The WQMP specifies structural and non-structural source control BMPs that would be incorporated into project design and implemented during construction both phases of construction. In addition to the stormwater construction BMPs required by the SWPPP, the project would incorporate LID BMPs throughout the construction phase of the project. Runoff generated on the project site would be captured by existing and proposed inlets and conveyed via new and existing storm drains to one existing infiltration basin and four new bioretention basins. One area, in which no impervious surfaces exist or are planned, will continue to discharge onto Almond Avenue (MBI 2024, p. 3-2 and Appendix A).

Operational (Phase II) Pollutant Controls

The Municipal Storm Water Program regulates storm water discharges from municipal separate storm sewer systems (MS4s) throughout California. The USEPA defines an MS4 as a *conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) owned or operated by a State* (40 CFR 122.26[b][8]).

The *National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements for the San Bernardino County Flood Control District, the County of San Bernardino, and the Incorporated Cities of San Bernardino County within the Santa Ana Region* (MS4 permit) regulates, through Order No. R8-2010-0036 and NPDES No. CAS618036, the discharge of pollutants into waters of the U.S. through stormwater and urban runoff conveyance systems, including flood control facilities. These conveyance systems are commonly referred to as municipal separate storm sewer systems (MS4s), or storm drains. In this context, the NPDES Permit is also referred to as an MS4 Permit.

Pursuant to the MS4 Permit, Principal Permittees (i.e., the San Bernardino County Flood Control District) and Co-Permittees (the City of Redlands is a Co-Permittee) must regulate discharges of pollutants in urban runoff from anthropogenic sources into storm water conveyance systems within their jurisdiction.

As new development and redevelopment occurs, it can significantly increase pollutant loads in stormwater and urban runoff, because increased development intensity results in proportionately higher levels of vehicle emissions, vehicle maintenance wastes, municipal sewage wastes, household hazardous wastes, fertilizers, pet waste, trash, and other anthropogenic pollutants (SWRCB, 2013). The MS4 Permit requires new development and significant redevelopment projects to incorporate post-construction low-impact development (LID) BMPs into project design to reduce or eliminate the quantity, and improve the quality of, stormwater being discharged from the project site.

A Preliminary WQMP (see **Appendix C**) specifies structural and non-structural source control BMPs that would be incorporated into project design and implemented during construction (Phase I) as well as during operation (Phase II). Runoff generated on the project site would be captured by existing and proposed inlets and conveyed via new storm drains (similar the LID BMPs of Phase I) to the existing infiltration basin and to new bioretention basins, which would replace those used during the construction phase. Runoff generated in the area that previously discharged directly to Almond Avenue would also be captured by proposed inlets and conveyed via new onsite storm drains and conveyed to a new bioretention basin. Filtered water from this bioretention basin would be

discharged to the existing infiltration basin; only treated overflow would discharge into the public storm drain on Almond Avenue (MBI 2024, p. 3-2 and Appendix A).

Additional structural source control BMPs would include (but not be limited to) provision of storm drain system stenciling and signage (all storm drain inlets will include stenciling illustrating an anti-dumping message; e.g., "Drains to Ocean"); design and construction of trash and waste storage areas to reduce pollution introduction to surrounding areas, including storm drains; use of efficient irrigation systems & landscape design, water conservation, smart controllers, and source control (Statewide Model Landscape Ordinance), and finishing the grade of landscaped areas at a minimum of 1 to 2 inches below top of curb, sidewalk, or pavement (MBI 2024, pp. 4-5 – 4-6).

Non-structural source control BMPs would include (but not be limited to) activity restrictions (activity restrictions to minimize potential impacts to water quality will be prescribed by the Covenant, Conditions and Restrictions [CC&R's] or a similar effective measure (activities that violate the ordinances in Chapter 13.54 if the City of Redlands Municipal Code will be restricted); BMP maintenance (activity restrictions to minimize potential impacts to water quality will be prescribed by the Covenant, Conditions and Restrictions (CC&R's) or a similar effective measure (activities that violate the ordinances in Chapter 13.54 if the City of Redlands Municipal Code will be restricted), and BMP maintenance (regular inspections and removal of debris, sediment buildup, and overgrown vegetation within the bioretention basins; and regular inspection of the underground infiltration shall be performed in accordance with manufacturers' guidelines (MBI 2024, pp. 4-2 – 4-4).

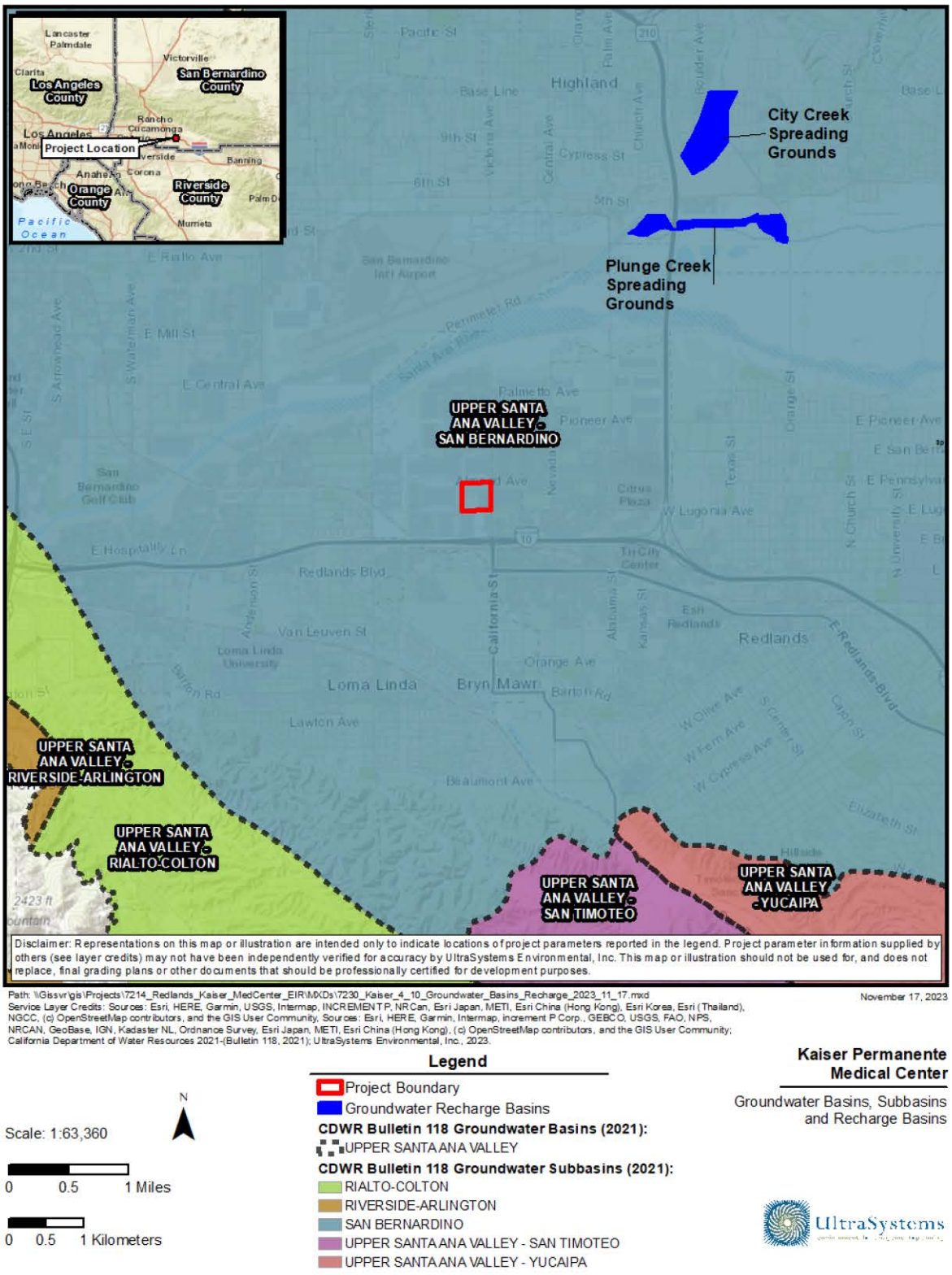
The project would be required to obtain coverage under the General Permit by preparing and implementing a project-specific SWPPP, and implementing construction stormwater BMPs prescribed in the SWPPP prior to commencement of construction activities. Additionally, BMPs must be maintained, inspected before and after each precipitation event, and repaired or replaced as necessary. Because the project is required by the SWRCB to comply with all applicable conditions of General Permit Order No. 2022-0057-DWQ, NPDES No. CAS000002, and with the incorporation of Phase I (construction) and Phase II (operational; i.e., Ultimate Condition) LID BMPs into project design, potential violations of water quality standards of surface, groundwater, and authorized non-stormwater discharge requirements during project construction would be less than significant.

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

Potentially Significant Impact

The project site is above the Upper Santa Ana Valley Groundwater Basin, Bunker Hill Subbasin (see **Figure 4.10-2**). The Bunker Hill Subbasin spans a surface area of 120 square miles, consists of the alluvial materials that underlay the San Bernardino Valley. Recharge to the Bunker Hill Subbasin historically has resulted from infiltration of runoff from the San Gabriel and San Bernardino Mountains. The Santa Ana River, Mill Creek, and Lytle Creek contribute more than 60 percent of the total recharge to the ground-water system. Lesser contributors include Cajon Creek, San Timoteo Creek, and most of the creeks flowing southward out of the San Bernardino Mountains. The subbasin is also replenished by deep percolation of water from precipitation and resulting runoff, percolation from delivered water, and water spread in streambeds and spreading grounds (DWR, 2004).

Figure 4.10-2
GROUNDWATER BASINS



As discussed in **Section 4.19**, The project site is in the City of Redlands and the Western Heights Water Company service area. The city receives surface water from Mill Creek and the Santa Ana River. A water supply assessment (WSA), which will provide a more detailed and detailed analysis of this issue, is being prepared for the proposed project. The impacts of the project on water supply will be addressed in the WSA and discussed further in the PEIR.

c) Would the project 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 offsite;

Less than Significant Impact

Topography of the project site is variable; elevation ranges between 1,132 feet above mean sea level (amsl) to 1,160 feet amsl. According to the existing conditions survey drawing included in Appendix B of the WQMP (MBI, 2024, Appendix B Entitlement Plans) (see **Appendix C** of this IS), the project site contains an existing detention basin in the northwest corner of the site and a smaller existing detention basin east of that. This WQMP also includes design plans for water quality BMPs.

Construction

As described **Section 4.10 a)**, temporary soil disturbance would occur during project construction, due to earth-moving activities such as excavation and trenching for foundations and utilities, soil compaction and moving, cut and fill activities, and grading. Disturbed soils are susceptible to high rates of erosion from wind and rain, resulting in sediment transport via stormwater runoff from the project area.

The project would be required to develop a Storm Water Pollution Prevention Plan (SWPPP) by a certified qualified SWPPP developer. The required SWPPP would be project-specific and would prescribe site specific stormwater BMPs which would be intended to minimize or avoid having soil leave the project site through either stormwater or wind erosion, and thus minimize or avoid soil erosion onsite and siltation in receiving waters.

In addition to implementation of the SWPPP, the project would incorporate LID BMPs into project design during the construction phase of the project, as described in **Section 4.10 a).** With implementation of the required SWPPP and incorporation and of LID BMPs into the design during the construction phase, impacts related to erosion or siltation on or off the project site would be less than significant. Mitigation is not required. would minimize or avoid substantial siltation offsite.

Operation

LID BMPs would be incorporated into the project design. LID BMPs intended to minimize erosion and sedimentation during project operation would be similar to those used during construction and have been discussed in detail in **Section 4.10 a)**.

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

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less than Significant Impact

The project site is within the Santa Ana Wash-Santa Ana River hydrologic until (i.e., watershed; hydrologic unit code 180702030507) that spans approximately 40 square miles (see **Figure 4.10- 2**). Implementation of the SWPPP and LID BMPs as described in **Section 4.10 a)** would retain most stormwater from leaving the project site during construction and operation, and would minimize or avoid the potential of substantially increased amounts of runoff with the potential to cause flooding, exceed the capacity of existing or planned storm drains, or creating additional sources of polluted runoff. Impacts would be less than significant, and mitigation is not required.

iv) Impede or redirect flood flows?

No Impact

The project site located in Zone X, which is defined by the Federal Emergency Management Agency (FEMA) as *Areas determined to be outside the 0.2% chance* [500-year] *floodplain* (see **Figure 4.10- 3**). Development of the project would not impede or redirect flood flows, and no impact would occur.

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

No Impact

As described in **Section 4.10-iv) above**, the proposed project site is above the 100-year flood hazard zone, and it is not anticipated that the site would become inundated due to flood. However, the project site is approximately nine miles downstream from the Seven Oaks Dam, owned by the County of San Bernardino Department of Public Work (National Dam ID CA01530, State Dam ID 87-016). Inundation maps based on a breach of the Seven Oaks Dam were reviewed, and it was determined that the project site is south of the inundation area of Seven Oaks Dam (County of San Bernardino Flood Control District 2017), nor is the project site within the inundation areas of smaller dams and reservoirs (DWR 2024a).

A tsunami is a sea wave (or series of waves) of local or distant origin that results from large-scale seafloor displacements associated with large earthquakes, major submarine slides, or exploding volcanic islands (California Seismic Safety Commission, 2024). The project site is approximately 48 miles northeast of the Pacific Ocean and the nearest tsunami zones are in Laguna Beach. The project is not at risk of inundation from tsunami, and there would be no impact.

A seiche is an oscillating wave caused by wind, tidal forces, earthquakes, landslides and other phenomena in a closed or partially closed water body such as a river, lake, reservoir, pond, and other large inland water body. A review of aerial imagery revealed the nearest waterbody large enough to experience a seiche is the large infiltration pond below Seven Oaks Dam, approximately six miles northeast of the project site. The project would not be at risk of seiche and there would be no impact.

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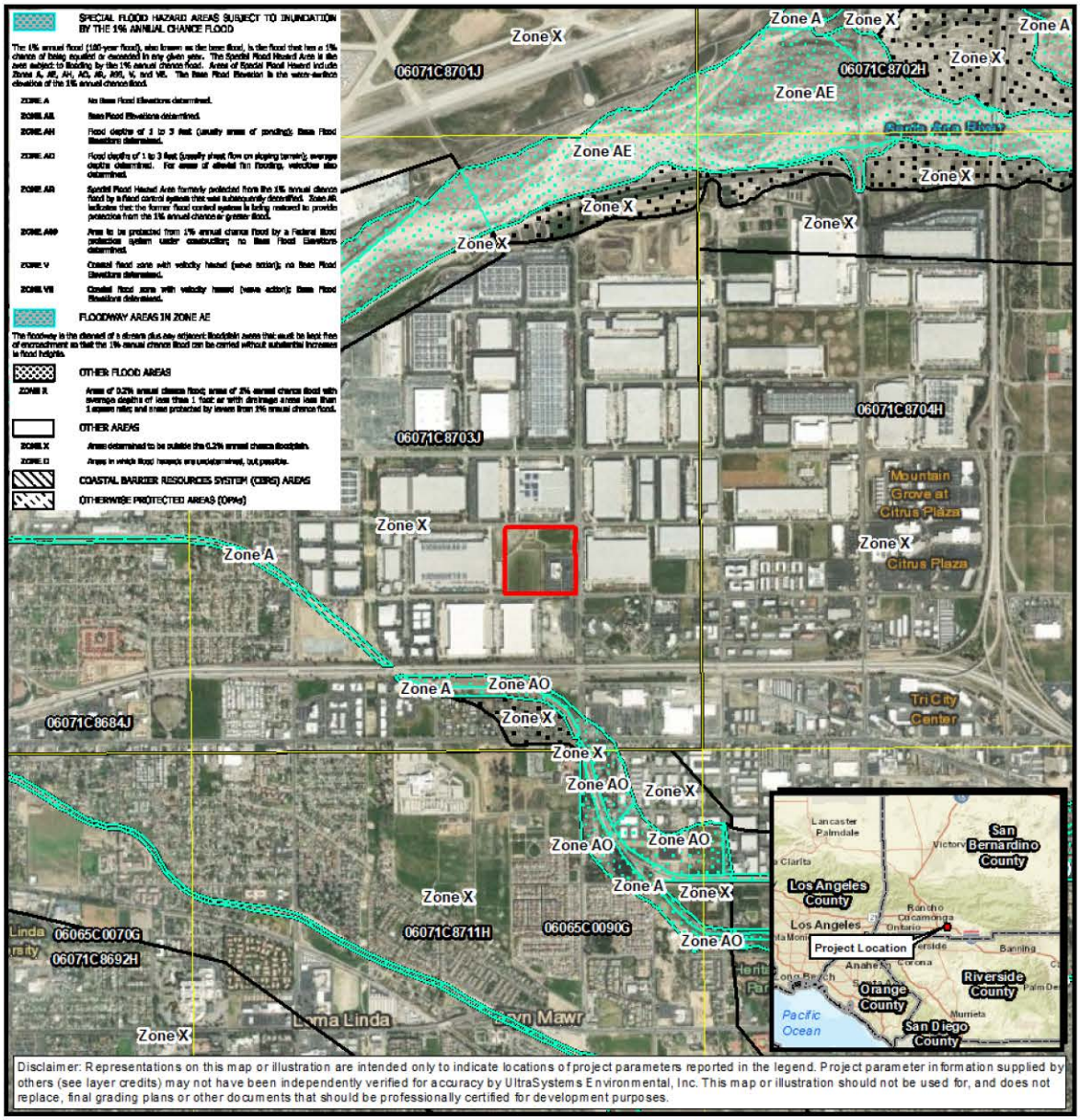
Figure 4.10-3
FEMA FIRM MAP



e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than Significant Impact

Water Quality Control Plan

The Water Quality Control Plan for the Santa Ana River Basin (Basin Plan), issued by the RWQCB in 1995 and updated as recently as 2019, lists beneficial uses of surface waters and groundwater in the region; sets forth water quality objectives, based on beneficial uses, for the same water bodies; and implementation plans and policies (RWQCB, 2019).

Implementation of the SWPPP and LID BMPs described in **Section 4.10 a** would retain most stormwater generated onsite. Stormwater generated onsite would enter the municipal storm drain system as overflow only during very large precipitation events (MBI 2024, pp. 4-11 – 4-12). Impacts would be less than significant.

Sustainable Groundwater Management Plan

The Bunker Hill groundwater subbasin, which underlays the project site, does not have a groundwater sustainability plan prepared (DWR 2024b). Thus, project implementation would not conflict with a groundwater sustainability plan. No impact would occur.

4.11 Land Use and Planning

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Physically divide an established community?				**X**
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?				**X**

a) Would the project physically divide an established community?

No Impact

The proposed project encompasses the development of the balance of an approximately 37-acre health services campus under a new master planned development permit procedure. The steps involve an Amendment No. 7 to Concept Plan 1, which would amend the permitting procedure in Concept Plan No. 1, Section IV, Part A; and the Planned Development No. 6, which would provide for the expansion of the existing Kaiser Permanente Redlands Medical Offices site in multiple phases. The development details are enumerated in **Section 3.0**. The existing development consists of a 120,000 square foot building and parking for Kaiser Permanente Redlands Medical Offices. The development of the project is confined to an existing parcel of record and would not physically divide an established community, and thus there would be no impact.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted to avoid or mitigate an environmental effect?

No Impact

The City of Redlands General Plan land use designation for the project site is Commercial Industrial, while the zoning (under the East Valley Corridor Specific Plan) is Medical Facilities District of Concept Plan 1 (CP-1) (see **Figures 4.11-1** and **4.11-2**). The proposed project is an allowed use within these designations.

There is currently a 120,000 square foot medical office building and parking for Kaiser Permanente Redlands Medical Offices on a portion of the site, and the remaining land is currently vacant on the 37-acre site. The project consists of the two elements summarized above, completed in four phases. Phase 1 would result in the development of the Ambulatory Services Center and the Medical Office Building No. 2; Phase 2 includes a hospital with associated support buildings, including the central utility plant and the parking structure; Phase 3 includes the construction of the Medical Office Building No. 3; and Phase 4 includes the possible expansion of the hospital.

Implementing the proposed project does not result in direct or indirect conflicts with any applicable land use plan, policy, or regulation adopted to avoid or mitigate an environmental effect. In the preparation of this initial study, no land use plans were intended specifically to avoid or mitigate an environmental effect that conflicts with any of the potential changes to the compatibility, conditional compatibility, or incompatibility of the land uses considered.

Figure 4.11-1
GENERAL PLAN LAND USE DESIGNATION

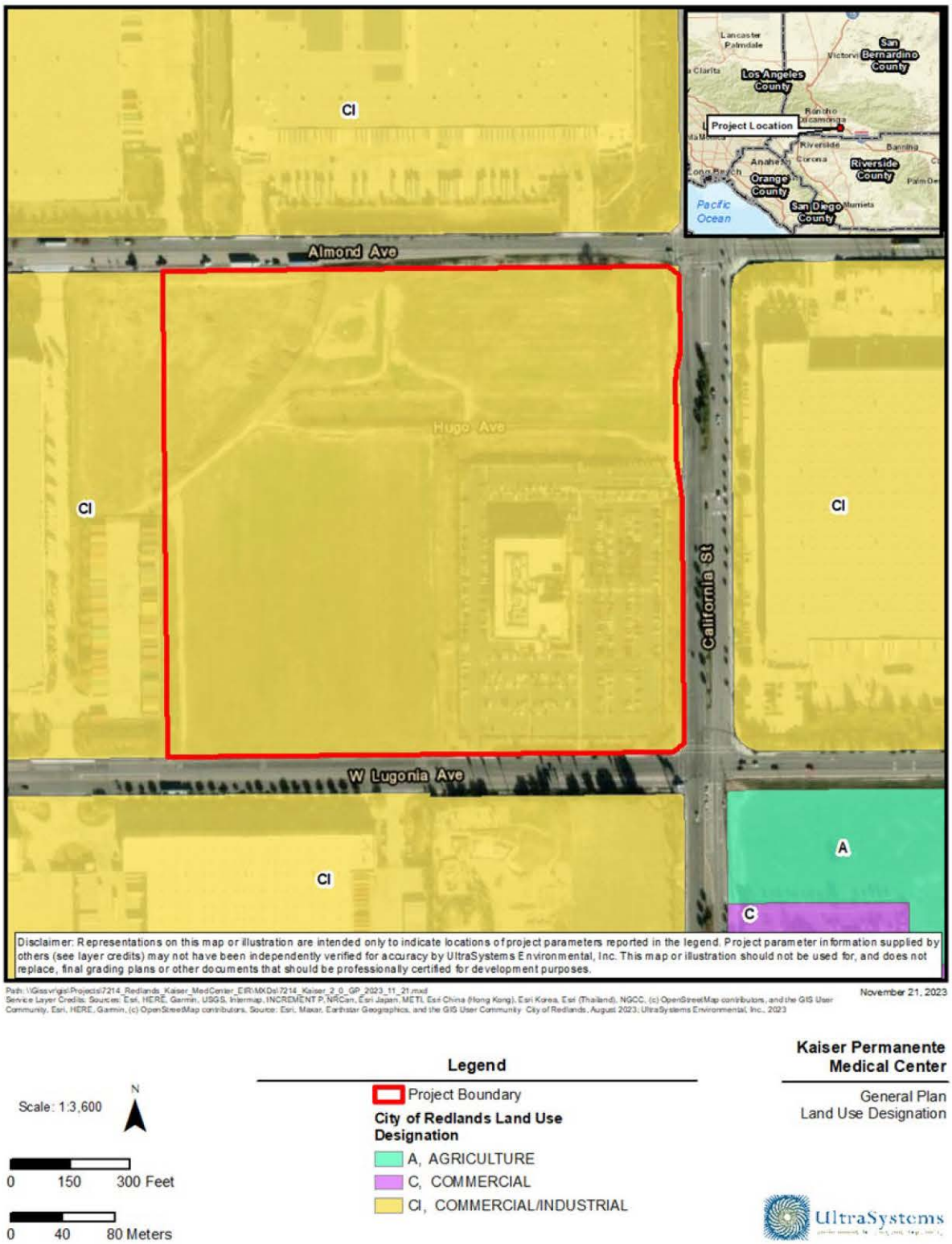
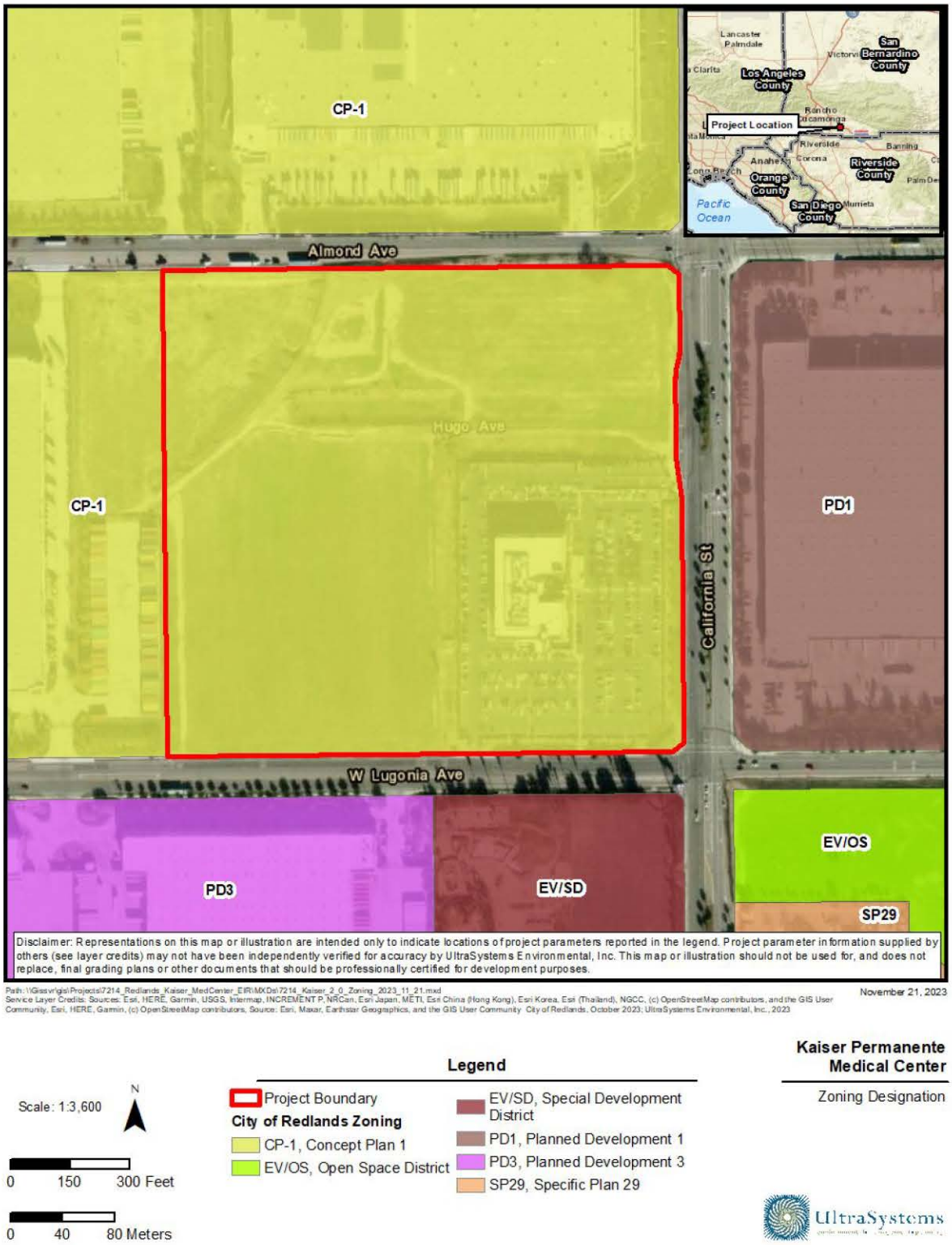


Figure 4.11-2
ZONING DESIGNATION



There is no potential for displacement of residential land use at any of the housing opportunity sites identified in the Housing Element of the General Plan of the City of Redlands. The proposed project is in accordance with the relevant elements of the General Plan, and therefore no adverse impact would occur.

4.12 Mineral Resources

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				**X**
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?				**X**

a) Would the project 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) Would the project 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?

No Impact

The project site is assigned to Mineral Resource Zone 3 (MRZ-3) by the California Geological Survey (CGS), as shown in **Figure 4.12-1**. MRZ-3 indicates an area of aggregate resources of undetermined significance. Nearly all of the southeast quadrant of the project site is developed with a medical office building and is thus unavailable for mining.

The areas proposed by the City of Redlands for future mining, as identified in the City's General Plan, are near the Santa Ana Wash and the northern city boundary, approximately 1.5 miles to the north (City of Redlands, 2017a).

Active oil or gas wells are not identified within the City of Redlands by the Division of Oil, Gas and Geothermal Resources (see **Figure 4.12-2**). The nearest active geothermal well to the project site is in the city of San Bernardino about 3.3 miles to the west (see **Figure 4.12-3**).

The development of the project would not cause a loss of availability of mineral resources valuable to the region or the mining sites identified in the general plan of the City of Redlands. No impact would occur, and this topic will not be further analyzed in the PEIR.

Figure 4.12-1
MINERAL LAND CLASSIFICATION MAP

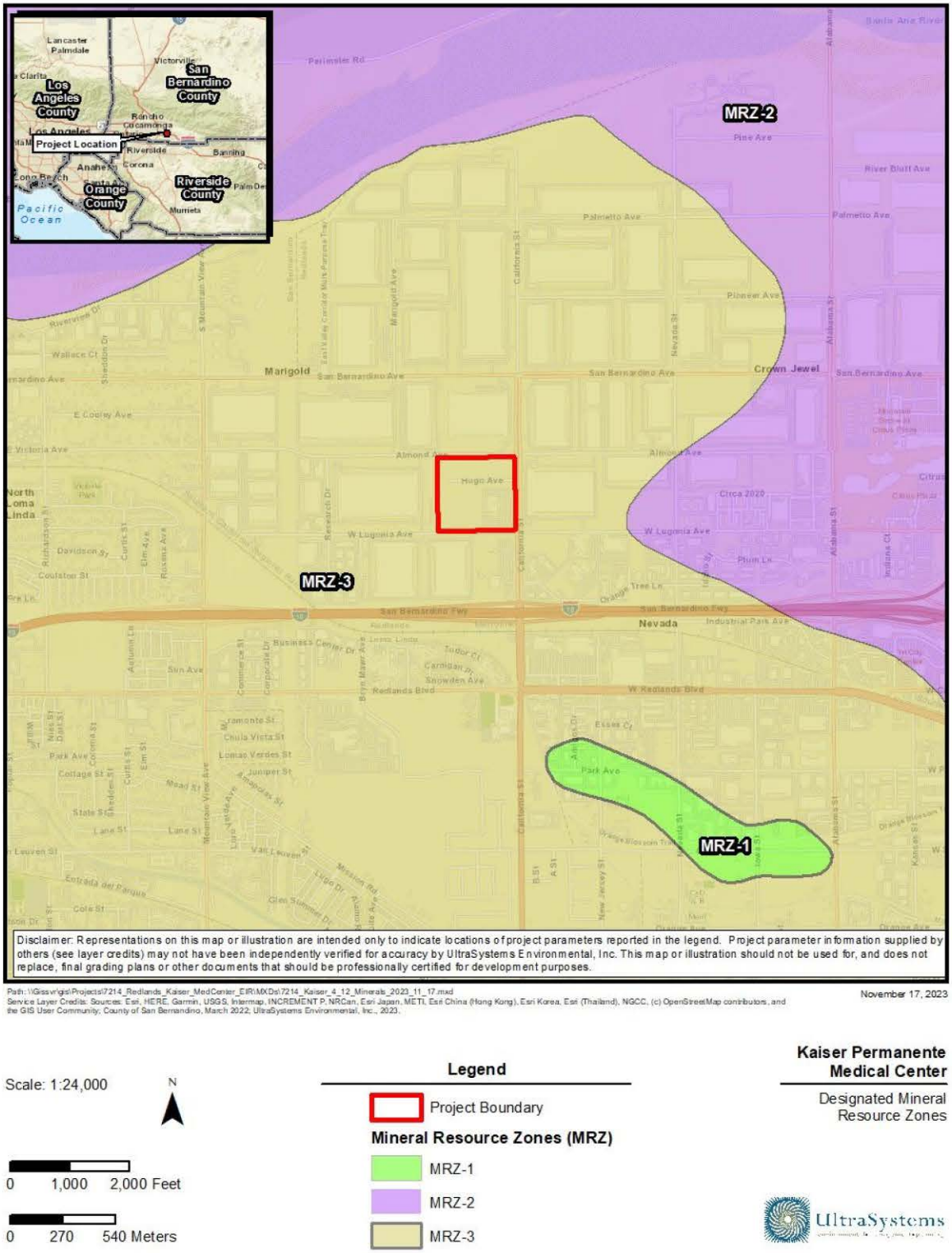


FIGURE 4.12-2
OIL AND GAS WELLS

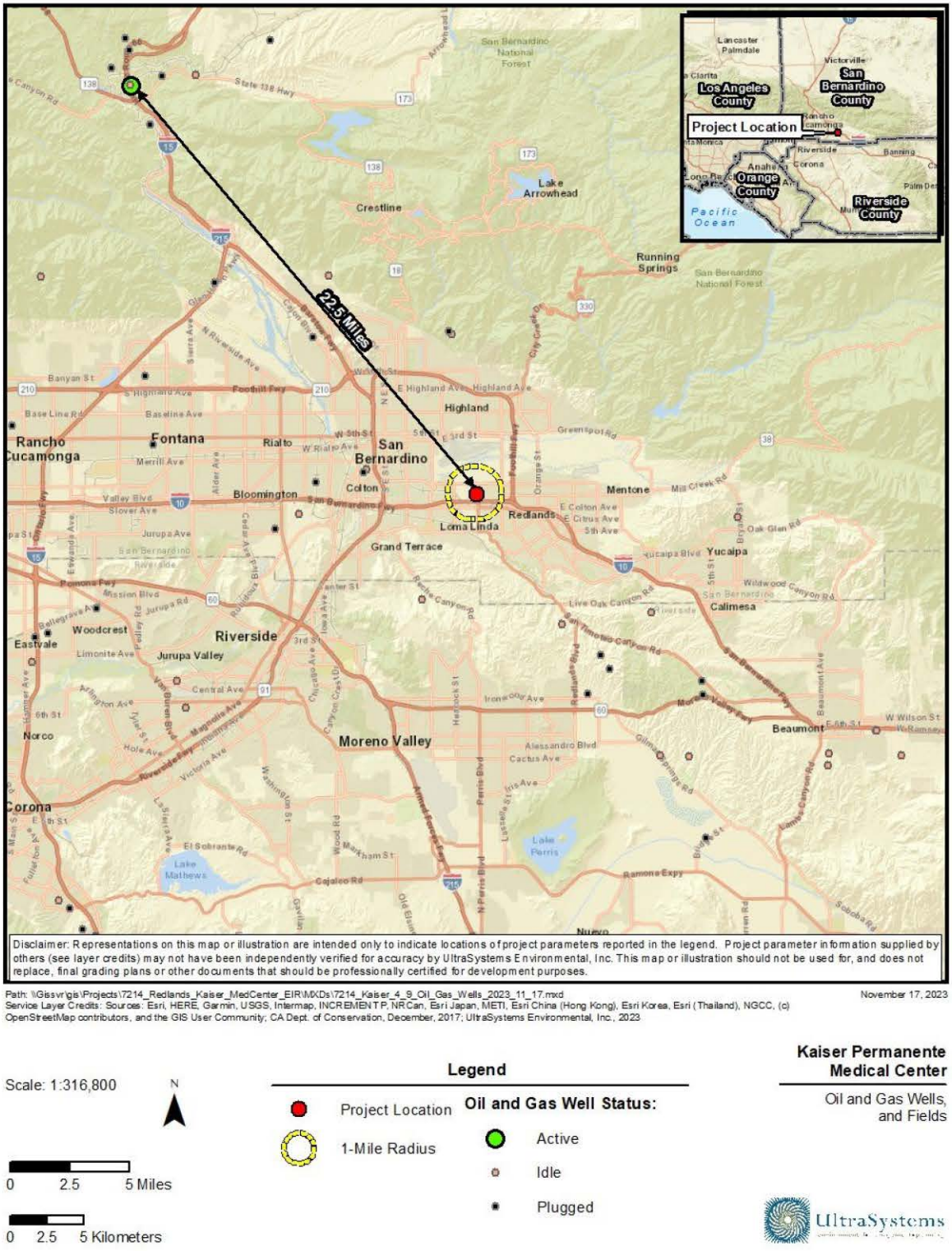
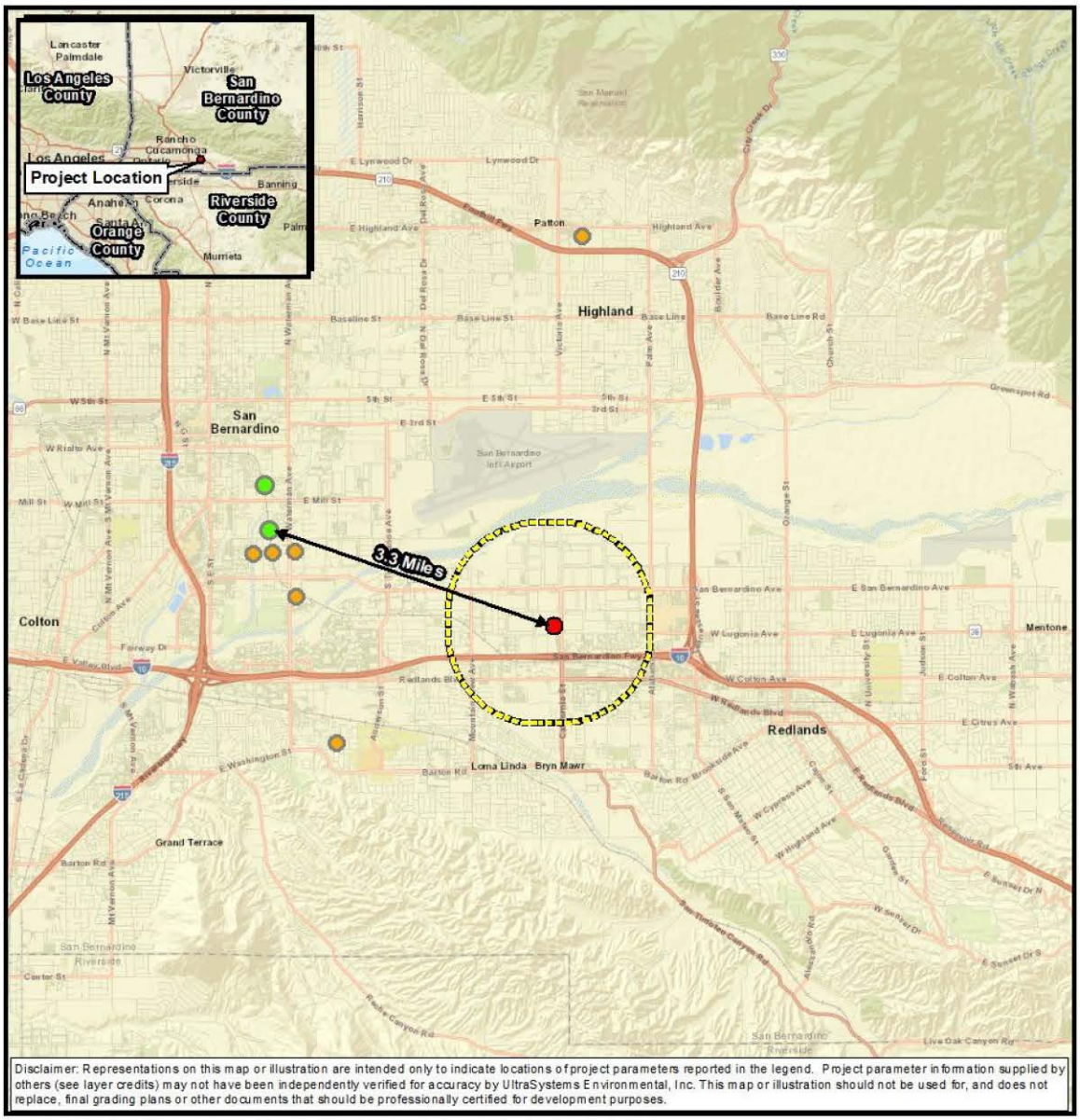


Figure 4.12-3
GEOTHERMAL WELLS



4.13 Noise

Would the project result in:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	X			
b) Generation of excessive groundborne vibration or groundborne noise levels?	X			
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?				X

a) Would the project result in generation of 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?

Potentially Significant Impact

Construction would cause temporary noise generation from specific construction activities, including building construction and other existing improvements. A noise analysis is underway for this project and will include ambient noise monitoring; identification of relevant noise standards (Redlands General Plan, Redlands Municipal Code); estimating construction impacts; determining significance of impacts; and specifying mitigation measures, as needed, to reduce significant impacts. Further and detailed analysis of potential construction noise impacts from the proposed project is warranted and will be included in the PEIR to be prepared for the project.

Project operation would cause noise through increased traffic generation; uses at some of the proposed new and renovated buildings; and mechanical noise from buildings. The noise analysis described in the preceding discussion of construction impacts will also address operational noise impacts. Further and detailed analysis of potential noise impacts during operation of the proposed project is warranted and will be included in the PEIR to be prepared for the project.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact

Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration. CEQA addresses two types of groundborne vibration impacts: architectural vibration and human annoyance.

Construction Vibration

Some types of construction equipment – one example being pile drivers – generate groundborne vibration that may cause significant impacts to nearby sensitive receptors. Further and detailed analysis of this issue is warranted and will be included in the PEIR to be prepared for the project. The noise and vibration analysis in the PEIR will include a screening assessment for groundborne vibration. If significant impacts are identified, mitigation measures will be prescribed in the PEIR.

Operational Vibration

Only a few categories of land uses – for instance, mining, some heavy industrial uses, freight railroads, and subway trains – generate sufficient groundborne vibration to cause significant impacts related to either architectural damage or human annoyance. The proposed project does not propose any of those categories of land uses. Impacts of project operation related to groundborne vibration are anticipated to be less than significant. Therefore, further analysis of operational vibration is not warranted, and this topic will not be included in the PEIR to be prepared for the project.

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

No Impact

As shown in **Figure 4.9-1** in **Section 4.9, Hazards and Hazardous Materials**, the nearest public-use airport to the project site is San Bernardino International Airport (SBIA) approximately 1.3 miles to the north. The project site is outside of noise contours for SBIA. The San Bernardino International Airport Authority Airport Layout Plan Narrative Report does not designate zones surrounding SBIA where land uses are regulated to minimize aviation-related hazards to persons on the ground (SBIA, 2010). Project development would not cause airport-related hazards, or excessive noise, to persons at the project site. No impacts would occur, and no mitigation is required. This topic will not be discussed further in the PEIR to be prepared for the project.

4.14 Population and Housing

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

a) Would the project induce substantial unplanned growth in an area either directly (for example, by proposing new homes and business) or indirectly (for example, through extension of roads or other infrastructure)?

Less than Significant Impact

Estimated and forecasted population, housing, and employment data for the City of Redlands are shown below in **Table 4.14-1**.

Table 4.14-1
ESTIMATED AND FORECAST DEMOGRAPHIC DATA, CITY OF REDLANDS

	2024	2045	Difference, 2045 - 2024	Percent Difference, 2045- 2024
Population	72,696	80,800	8,104	10.6%
Households	26,693	30,800	4,107	14.2%
Employment	39,210	56,300	17,090	35.8%

Sources: California DOF E-5, 2024; US Census Longitudinal Employer- Household Dynamics, 2023; SCAG 2020.

The project does not propose the construction of any residential uses or extension of existing infrastructure. The project would create employment opportunities during construction; however, it is anticipated that employees from the local workforce would be hired during the construction phase of the project. Project-generated increases in highly skilled employment can be anticipated to attract a small number of households into the City of Redlands. However, considering the forecast housing growth in the City (4,107 between 2024 and 2045), the number of households that project employment generation may attract into the city is lower than the regional forecast for housing growth. Impacts would be less than significant. This will not be discussed further in the PEIR.

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

No Impact

The project site does not contain any residential structures. Therefore, the project would not displace any housing or people, and the project would not necessitate the construction of replacement housing. No impact would occur. This will not be discussed further in the PEIR.

4.15 Public Services

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, 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:				
a) Fire protection?	**X**			
b) Police protection?	**X**			
c) Schools?				**X**
d) Parks?				**X**
e) Other public facilities?				**X**

a) Fire protection?

Potentially Significant Impact

Fire protection services are provided to the project site by Redlands Fire Department (City of Redlands, 2017b, p. 3.13-14). Development of the proposed project could potentially cause significant impact to fire protection service times. Therefore, this topic will be further analyzed in the PEIR.

b) Police protection?

Potentially Significant Impact

Police protection services are provided to the project site by Redlands Police Department (City of Redlands, 2017b, p. 3.13-13). Development of the proposed project could potentially cause a significant impact to police protection service times. Therefore, this topic will be further analyzed in the PEIR.

c) Schools?

No Impact

Demands for school services are generated by increases in population. As detailed in **Section 4.14**, Population and Housing, the project's scope would not generate an increase in population since it is not a residential project. Construction and operational workers are expected to be from the project area and would not contribute to an increase in population. Therefore, there would be no impact to schools and this topic will not be further evaluated in the PEIR.

d) Parks?

No Impact

Demands for park services are generated by increases in population. As detailed in **Section 4.14**, Population and Housing, the project's scope would not generate an increase in population as it is not a residential project. Construction and operational workers are expected to be from the project area and would not contribute to an increase in population. Therefore, there would be no impact to parks

and this topic will not be further evaluated in the PEIR.

e) Other Public Facilities?

No Impact

Libraries

Demands for library services are generated by increases in population. As detailed in **Section 4.14**, Population and Housing, the project's scope would not generate an increase in population as it is not a residential project. Construction and operational workers are expected to be from the project area and would not contribute to an increase in population. Therefore, there would be no impact to libraries and this topic will not be further evaluated in the PEIR.

Hospitals

The proposed project would generate more hospital facilities to offer more hospital services in the project area. Therefore, the project would be a benefit to hospital service availability and this topic will not be further evaluated in the PEIR.

4.16 Recreation

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				**X**
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?				**X**

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact

The proposed project includes two elements: (1) Amendment No. 7 to Concept Plan 1; and (2) Planned Development No. 6. Amendment No. 7 to Concept Plan 1 would add a 'Development Plan' procedure concerning the review and approval of large-scale, mixed use or multi-phased developments. Planned Development No. 6 is a proposed Development Plan for proposed future medical offices, hospital buildings, and parking as described in Section 3.0 of this IS. The proposed project does not include residential development or development that would result in the increased use of parks or recreational facilities.

The City has a park standard of five acres per 1,000 persons residing within the City (City of Redlands, 2017b, p. 3.13-19). The City of Redlands has approximately 424.2 acres of developed parkland, enough to meet this performance standard (City of Redlands, 2017b, p. 3.13-2). Brookside Park, 9.5 acres, is at 1630 Brookside Avenue approximately three miles southeast of the project site. Other public parkland within four miles of the project site includes Heritage Park, 18.4 acres, located approximately 3.3 miles to the southeast (City of Redlands, 2017b, p. 3.13-2). The City of Redlands Geneal Plan EIR states that in 2035, with 140.9 acres of proposed parkland and an expected 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 five acres per 1,000 people (City of Redlands, 2017b, p. 3.13-19).

The City of Redlands Recreation Division provides recreation services and maintains city-owned and operated parks in the City, including near the project site. Demands for recreational facilities are generated by the population in the facilities' service areas. As the project would not add population to the City, the project would not increase demand for such facilities. Construction workers will be on the project site during construction, but potential impact on park facilities associated with use by construction workers would be short term and have no impact on the facilities. Therefore, no impacts would occur, and this topic will not be discussed further in the PEIR.

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?

No Impact

As described above, the proposed project does not propose new or expanded recreational facilities that would have any impact on the environment. The sites of potential future parks or park facilities are currently unknown, and thus any attempt at assessing impacts of such development would be speculative. Such development would be subject to separate CEQA review.

4.17 Transportation

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

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

Less than Significant Impact

Lugonia Avenue, which bounds the project site to the south, is a four-lane roadway with a striped ("double-double") median; sidewalks are present along the northern side of the roadway abutting the eastern part of the project site, and next to the south side of the roadway the along entire length of the site. California Street, next to the eastern site boundary, is a four-lane roadway with a raised median and sidewalks along both sides of the roadway. Almond Avenue, which passes along the northern site boundary, is a three-lane roadway (two westbound lanes and one eastbound lane) with a sidewalk present adjacent to the north side of the roadway, across from the project site.

Omnitrans provides transit bus service in the project region. The nearest Omnitrans route to the proposed project site is Route 8, which extends east-west from the city of San Bernardino to the city of Yucaipa (Omnitrans, 2023a). Route 8 operates on Redlands Boulevard south of the project site, seven days per week, at an hourly frequency (Omnitrans, 2023b).

Applicable Plans, Ordinances, and Policies

Statewide Transportation Improvement Program (STIP)

The Statewide Transportation Improvement Program (STIP) is a multi-year capital improvement program of transportation projects on and off the State Highway System, funded with revenues from the State Highway Account and other funding sources. The proposed project development is not a transportation project and would not conflict with the STIP.

San Bernardino County Congestion Management Program (CMP)

The intent of the CMP is to provide the analytical basis for transportation decisions through the STIP process. The CMP, published by the San Bernardino County Transportation Authority (SBCTA), defines a network of state highways and arterials in the county and provides guidelines regarding level of service (LOS) standards, impact criteria, and a process for mitigation of impacts on CMP facilities. With certain exceptions, the minimum acceptable LOS for CMP facilities is LOS E. Specifically, the CMP states, "In no case shall the LOS standards established be below the LOS E or the current level, whichever is farthest from LOS A. When the LOS on a segment or at an intersection fails to attain the established LOS standard, a deficiency plan shall be adopted pursuant to Section 65089.4" (SBAG, 2016, p. 1-2). The CMP was last updated in 2016.

City of Redlands General Plan – Connected City Chapter

The City of Redlands Geneal Plan Connected City Chapter contains policies respecting a layered, multi-modal network; pedestrian, bicycle, and vehicular movement; transit; transportation demand management (TDM) and parking; and goods movement (City of Redlands, 2017).

City of Redlands Sustainable Mobility Plan

The Sustainable Mobility Plan promotes citywide walking, biking, and transit connections for all residents, including communities that currently have limited access and choices. The SMP outlines a strategy that includes balancing street design for use by people, cars, bicyclists, children, seniors, and bus/rail users (City of Redlands, 2021a).

City of Redlands Bicycle Master Plan

The City of Redlands Bicycle Master Plan provides a vision for improving the bicycling environment by providing direction for the expansion of the existing bikeway network, connection of gaps, recommendations for bicycle support facilities, and education and awareness programs (City of Redlands, 2014).

Proposed project development would not conflict with any of the above-described policies. Impacts would be less than significant, and this topic will not be analyzed in the PEIR.

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

Potentially Significant Impact

CEQA Guidelines section 15064.3(b) pertains to the use of Vehicle Miles Traveled (VMT) as a method of determining the significance of transportation impacts. A VMT analysis for the proposed project is under preparation. Further and detailed analysis of this topic is warranted. The methods and findings of the VMT analysis will be included in the PEIR for the proposed project.

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

Less than Significant Impact

Existing vehicular access to the medical office building onsite consists of a main entrance from California street on the east side of the project site, and a secondary entrance from Lugonia Avenue on the south side of the project site. Proposed additional site access points, by project phase, consist of:

Phase 1: access from Almond Avenue on the north side of the project site (see **Figure 3.3-2**).
Phase 2: access from Lugonia Avenue and access from Almond Avenue (see **Figure 3.3-3**).
Phases 3 and 4: no additional access points would be built.

All of the proposed intersections connecting project access driveways and surrounding roadways would be roughly perpendicular. Site plans are included in **Appendix A**. The site plans show proposed project site circulation at each development phase and the Fire Protection Plans for each phase show the fire truck turning movement and routes.

The proposed facilities would be essential facilities, that is, vital to the continued delivery of key government services or having significant impact on the public's ability to recover from an emergency. The proposed project driveways would comply with City of Redlands design standards for driveways and the site plans would be required to be reviewed and approved by the City of Redlands engineering department. The proposed project driveways would also comply with City of Redlands Fire Code requirements for fire apparatus access roads. Approved fire apparatus access roads are required within 150 feet of all portions of the exterior walls of the first story of each building. Such roads must be at least 20 feet wide, have 13 feet 6 inches of vertical clearance, and must provide all-weather driving capabilities for fire apparatus (Amlegal.com, 2023, Chapter 15.20). The City of Redlands Fire Department would verify that driveways and access roads had adequate turning radii for fire apparatus during project planning. Therefore, project development would not cause substantial hazards due to circulation design features or incompatible uses, and impacts would be less than significant. This topic will not be addressed in the PEIR.

d) Would the project result in inadequate emergency access?

Less than Significant Impact

Construction

It is expected that California Street and Lugonia Avenue would both be used as evacuation and/or emergency response routes. Project construction could temporarily reduce the number of lanes or temporarily close portions of California Street and Lugonia Avenue. The City requires that projects conducting construction work in the public right-of-way (ROW) get encroachment permits approved by the City Municipal Utilities & Engineering Department. Emergency access must be maintained. Compliance with City requirements for traffic management during construction in the public ROW would ensure that the project would have a less than significant impact. This topic will not be analyzed further in the PEIR.

Operation

Project operation would not close or impede access via roadways surrounding the project site (Lugonia Avenue, Almond Avenue, and California Street), and would thus have no adverse impact on emergency access. This topic will not be analyzed further in the PEIR.

4.18 Tribal Cultural Resources

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a tribal cultural resource that is 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 § 5020.1(k)?				**X**
b) Cause a substantial adverse change in the significance of a tribal cultural resource that is determined to be a significant resource to a California Native American tribe pursuant to the criteria set forth in subdivision (c) of Public Resource Code § 5024.1(c)?	**X**			

Information from UltraSystems' Phase I Cultural Resources Inventory, dated October 2024 for the proposed project (refer to **Appendix B**) is included in the analysis below.

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource that is 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 § 5020.1(k)?

No Impact

A traditional cultural site within a 0.5-mile buffer of the project boundary is documented in the Native American Heritage Commission's (NAHC) Sacred Lands File (SLF) search. No resources as defined by Public Resources Code § 21074 have been identified. Additionally, the project site has not been recommended for historic designation for prehistoric and tribal cultural resources (TCRs). No specific tribal resources have been identified by local tribes responding to Outreach inquiries for purposes of the Cultural Resources Inventory, outside of the AB 52 and SB 18 consultation process. Three of the tribes did express concerns regarding potential nearby traditional cultural resources.

No prehistoric archaeological resources were observed during the archaeological field survey conducted November 6, 2023 by Stephen O'Neil, M.A., RPA and Mr. Rodrigo Jacobo, M.A., as part of the cultural resources investigation. The results of the pedestrian assessment indicate the low potential for the presence of prehistoric cultural resources. No prehistoric archaeological resources were identified in the CHRIS record literature search in the project site or area.

No tribal cultural resources onsite are 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 § 5020.1(k). Therefore, the project would have no impact in this regard.

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource that is determined to be a significant resource to a California Native American tribe pursuant to the criteria set forth in subdivision (c) of Public Resource Code § 5024.1(c)?

Potentially Significant Impact

Senate Bill 18 (SB 18) and Assembly Bill 52 (AB 52) requires meaningful consultation with California Native American Tribes on potential impacts on tribal cultural resources (TCRs) that may result from zoning and master plan changes. The State of California Governor's Office of Planning and Research developed these Tribal Consultation Guidelines in order to provide guidance to cities and counties on the process for consulting with Native American Indian tribes during the adoption or amendment of local general plans or specific plans (defined in Government Code § 65450 et seq.). SB 18 requires local agencies to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process, thereby providing tribes an opportunity to participate in local land use decisions at an early planning stage.

Kevin Beery, Senior Planner with the City of Redlands (the lead agency) has initiated SB 18 outreach to local tribes for the Kaiser Permanente Medical Center Project. Consultation invitations were sent to the participating tribes through email and certified mail informing them of the project on February 23, 2023 and March 8, 2023. In accordance with SB 18, a tribe has 90 days in which to respond and request opening consultation, unless a shorter timeframe has been agreed to by the tribe.

The tribes contacted on February 23, 2023 included:

- Agua Caliente Band of Cahuilla
- Augustine Band of Cahuilla Mission
- Cabazon Band of Mission Indians
- Cahuilla Band of Indians
- Gabrieleño Band of Mission Indians – Kizh Nation
- Los Coyotes Band of Cahuilla and Cupeño Indians
- Morongo Band of Mission
- Pala Band of Mission Indians
- Pechenga Band of Indians
- Quechan Tribe of Ft. Yuma Reservation
- Ramona Band of Cahuilla
- Rincon Band of Luiseño Indians
- San Manuel Band of Mission
- Santa Rosa Band of Cahuilla
- Serrano Nation of Mission
- Soboba Band of Luiseño
- Torres Martinez Desert Cahuilla

The tribes contacted on March 8, 2023 include:

- Chemehuevi Indian Tribe
- Colorado River Indian Tribes
- Fernandeño Tataviam Band of Mission
- Fort Mojave Indian Tribe
- Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Gabrielino/Tongva Nation
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino-Tongva Tribe
- Juaneño Band of Mission Indians Acjachemen Nation - Belardes
- Juaneño Band of Mission Indians Acjachemen Nation – 84A
- Kern Valley Indian Community
- Pechanga Band of Indians
- Quechan Tribe of the Fort Yuma Reservation
- Ramona Band of Cahuilla Indians
- Twenty-Nine Palms Band of Mission Indians

Six responses have been received to date (K. Beery to S. O'Neil, personal communication; November 7, 2023). Five of these responses indicated that the tribes were not concerned about the project and did not express interest in participating in consultation. These tribes included the Agua Caliente Band of Cahuilla Indians, Augustine Band of Cahuilla Indians, Fernandeño Tataviam Band of Mission Indians. Rincon Band of Luiseño Indians, and Yuhaaviatam of San Manuel Nation. The Yuhaaviatam of San Manuel Nation also provided a set of Mitigation Measures to be included if possible. The first measure describes that the tribe would like to be contacted if any pre-contact and/or historic-era cultural resources are discovered during the project. The second requests that all archaeological/cultural documents be provided to the tribe.

In a response received from the Gabrieleño Band of Mission Indians – Kizh Nation, the tribe indicated that the proposed project location is within the tribe's Ancestral Tribal Territory and requests consultation with the lead agency. Consultation took place over the phone on June 15, 2023. Consultation under AB 52 and S 18 with the Kizh Nation is ongoing.(K. Beery to S. O'Neil, personal communication; October 4, 2024).

The Impacts are deemed Potentially Significant pending completion of the SB 18 and AB 52 consultation and incorporation of suggested mitigation measures.

A more detailed version of the TCR documentation and accepted Mitigation Measures will be presented in the PEIR to be prepared for this project.

4.19 Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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 facilities, the construction or relocation of which could cause significant environmental effects?	**X**			
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	**X**			
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 of the project in addition to the provider's existing commitments?			**X**	
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?			**X**	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			**X**	

a) Would the project 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 facilities, the construction or relocation of which could cause significant environmental effects?

Potentially Significant Impact

Domestic Water – Water in the planning area is provided by the City of Redlands and the Western Heights Water Company. The City's water system is maintained by the Municipal Utilities and Engineering Department (MUED) and covers most of the city.

Domestic water sources for the City of Redlands consist of both surface (about 50 percent of total supply) and groundwater (about 50 percent of total supply). The City is entitled to surface water from Mill Creek and the Santa Ana River. Mill Creek water is available on the basis of rights owned directly by the City and by virtue of the City's stock ownership in the Crafton Water Company, which has established rights on the remainder of Mill Creek flows. Mill Creek water is treated at the Henry Tate Water Treatment Plant, which then flows by gravity to the City's distribution system. The City's entitlement to Santa Ana River flows has a basis in stock ownership in Bear Valley Mutual Water Company (BV) and other mutual water companies. The Santa Ana River water is treated at the Horace

Hinckley Surface Water Treatment Plant (City of Redlands, 2017a, p. 3.14-1). A water supply assessment (WSA) is being prepared for the proposed project. The findings of the WSA will be discussed in the PEIR.

Water Treatment – Currently, the City is the only agency in the Planning Area that produces recycled water that can be used for irrigation and industrial uses. The City wastewater treatment plant (WWTP) has the capacity to treat 7.2 million gallons of wastewater per day at the tertiary level (City of Redlands, 2017a, p. 3.14-2). The impacts of the project on water treatment capacity will be addressed in the WSA and will be discussed in the PEIR.

Stormwater – Project impacts on stormwater drainage will be addressed in the PEIR to be prepared for the project; Refer to **Section 4.10,** Hydrology and Water Quality, for a further detailed discussion of this topic.

Electric Power: Southern California Edison provides electricity to the project site. The proposed project is in a developed area and the infrastructure to provide electric power to the area is well established. SCE typically utilizes existing utility corridors to reduce environmental impacts and has energy efficiency programs to reduce energy usage and maintain reliable service throughout the year (SCE, 2024). Further and more detailed analysis of this issue is warranted and will be undertaken in the PEIR to be prepared for the proposed project.

Natural Gas: The Southern California Gas Company (SoCalGas) provides natural gas to the project site; the SoCalGas service area covers most of the southern half of California. A more detailed analysis of this issue is warranted and will be undertaken in the PEIR to be prepared for the proposed project.

Telecommunications Facilities: Spectrum, Frontier, AT&T, HughesNet, T-Mobile, Verizon, and others provide telecommunications services within the project site area. The facilities of any or all of these telecommunications providers are expected to be extended to the proposed project buildings from existing lines onsite or on adjacent roadways. The proposed project would not interfere with the operation of telecommunication facilities and therefore would have a less than significant impact.

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

Potentially Significant Impact

The project site is in the City of Redlands and the Western Heights Water Company service area. As noted in **Section 4.19a** above, the City receives surface water from Mill Creek and the Santa Ana River. A water supply assessment (WSA), which will provide a more detailed and detailed analysis of this issue, is being prepared for the proposed project. The impacts of the project on water supply will be addressed in the WSA and discussed further in the PEIR.

c) Would the project result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to meet the projected demand of the project in addition to the existing commitments of the provider?

Less than Significant Impact

As noted in **Section 4.19a** above, the City's wastewater treatment plant has the capacity to treat 7.2 million gallons of wastewater per day. The impacts of the project with respect to wastewater treatment capacity will be addressed in the WSA and discussed in the PEIR.

d) Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less than Significant Impact

The Department of Facilities and Community Services of the City of Redlands collects solid waste for the City of Redlands. Solid waste from the City of Redlands is deposited at California Street Landfill, approximately two miles north of the project site (City of Redlands, 2017b, p. 3.7-3). The Department of Municipal Utilities of the City of Redlands operates the California Street Sanitary Landfill, which handles municipal solid waste generated in the City. California Street Landfill has a remaining capacity of 5.17 million cubic yards and a maximum permitted daily disposal capacity of 829 tons (CalRecycle, 2023). With recent improvements, the life of the California Street Landfill has been extended another 11 years, to 2053 (City of Redlands, 2022, p. 11).

Construction

Construction of the project would generate solid waste that would be disposed of in local landfills. Materials generated during the construction of the project would include paper, cardboard, metal, plastics, glass, concrete, lumber scraps, and other materials. Section 5.408 of the 2022 California Green Building Standards Code (CALGreen; California Code of Regulations, Title 24, Part 11) requires that at least 65 percent of the non-hazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. Project construction would include recycling and/or salvaging at least 65 percent of construction and demolition waste in accordance with the 2022 CALGreen standards. Sufficient capacity is available at recycling and landfill facilities in the region for the demolition debris estimated to be generated by the project. The impacts would be less than significant. This topic will not be analyzed further in the PEIR that is being prepared for the project.

Operation

The project operation is estimated to generate a net increase of approximately 6,063 pounds of solid waste per day, as shown in **Table 4.19-1**. The California Street Landfill averages an inbound tonnage of 202.07 tons per operational day. Peak tonnage was recorded on September 5, 2023, with a total inbound tonnage of 253.59 tons. The California Street Landfill has an average residual daily disposal capacity of 626.93 tons per day operating well below the maximum permitted tonnage of 829 tons per day (CalRecycle, 2023). Solid waste generated by the project would be approximately 0.48 percent of the residual daily capacity of the landfill. The impact of the project on the capacity to dispose of solid waste would be less than significant. This topic will not be analyzed further in the PEIR that is being prepared for the project.

Table 4.19-1
ESTIMATED OPERATIONAL SOLID WASTE GENERATION

Building (Phase)	Land Use	Net Change (sq.ft)	Solid Waste Generation*	
			sq. ft.	Total
Ambulatory Services Center/Medical Office Building No. 2 (Phase 1)	Institutional: Health Care, Medical Office, etc.	165,000	0.007	1,155
Hospital (Phase 2)	Institutional	400,000	0.007	2,800
Central Utility (Phase 2)	Infrastructure / Maintenance	35,000	0.01	350
Medical Office Building No. 3 (Phase 3)	Institutional	83,000	0.006	498
(Possible) expansion (Phase 4)	Institutional	180,000	0.007	1,260
Total (all Buildings and Phases)		**863,000**		**6,063**

Source: CalRecycle, 2023 Note: * pounds per square foot

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact

In 1989, the California Legislature enacted the California Integrated Waste Management Act (AB 939), in an effort to address solid waste problems and capacities in a comprehensive way. The law required each city and county to divert 50 percent of its waste from landfills by the year 2000. The County has 49 solid waste diversion programs including composting, facility recovery (such as transfer stations), household hazardous waste, public education, recycling, and source recovery (CalRecycle, 2023c)

Assembly Bill 341 (AB 341; Chapter 476, Statutes of 2011) increases the statewide waste diversion goal to 75 percent by 2020 and mandates recycling for commercial and multi-family residential land uses. The project would include recycling materials storage areas according to AB 341.

Assembly Bill 1826 (AB 1826; California Public Resources Code Sections 42649.8 et seq.) requires the recycling of organic matter by businesses and multifamily residences of five or more units, generating such waste in amounts over certain thresholds. Organic waste means food waste, green waste, landscape and pruning waste, non-hazardous wood waste, and food-soiled paper waste mixed with food waste. The project would include the recycling of organic waste as required for County operations and community organizations under AB 1826. The proposed project would comply with the applicable local, state, and federal standards for solid waste disposal standards; therefore, the impacts would be less than significant.

Senate Bill 1383 (SB 1383; California Health and Safety Code Sections 39730.5 et seq.) set targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The law is intended to reduce methane emissions, a short-lived climate pollutant, from the decomposition of organic waste in landfills, to protect people in at-risk communities, and to reduce GHG emissions. The project would include the recycling of organic waste as required by SB 1383.

Section 5.408 (Construction Waste Reduction, Disposal, and Recycling) of the 2022 California Green Building Standards Code (CALGreen; Title 24, California Code of Regulations, Part 11) requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. Demolition and construction during project development would comply with the specified CALGreen section. The proposed project would comply with the applicable local, state, and federal standards for solid waste disposal standards; therefore, the impacts would be less than significant. This topic will not be further analyzed in the PEIR that is being prepared for the project.

4.20 Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				**X**
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?				**X**
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?				**X**
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?				**X**

a) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact

The project site is not located in a State Responsibility Area (SRA) (i.e., where the State is responsible for the costs of wildfire prevention and suppression), nor is it located in a Very High Fire Hazard Severity Zone (VHFHSZ) within a Local Responsibility Area (LRA) (see **Figures 4.20-1** and **4.20-2**), (i.e., where cities or counties are responsible for the costs of wildfire prevention and suppression). The nearest VHFHSZ in a LRA to the project site is about 2.2 miles to the south, within the City of Redlands. The proposed project would not "substantially impair an adopted emergency response plan or emergency evacuation plan" and as such would have no impact. This topic will not be analyzed further in the PEIR.

Figure 4.20-1
FIRE HAZARD SEVERITY ZONES IN STATE RESPONSIBILITY AREAS

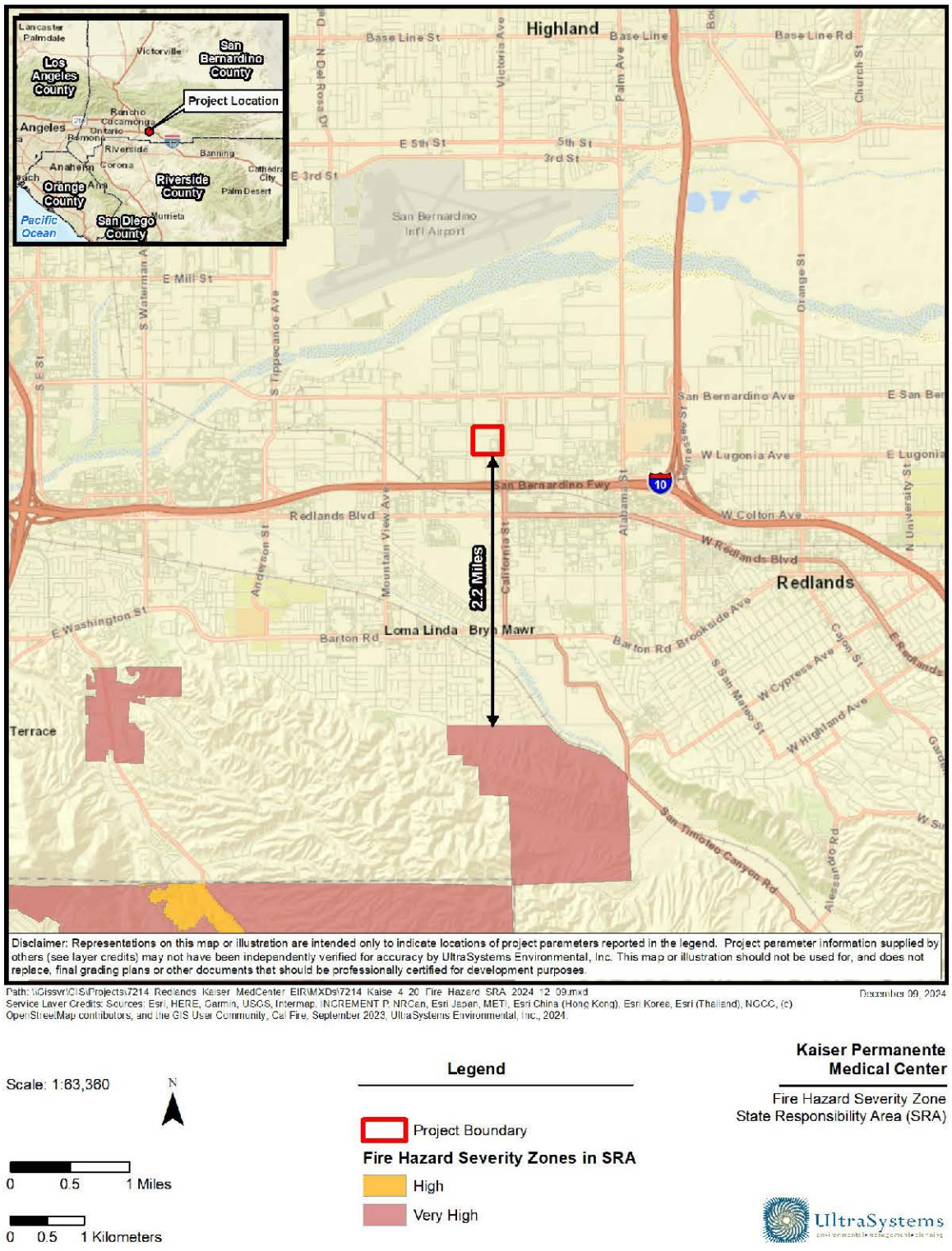
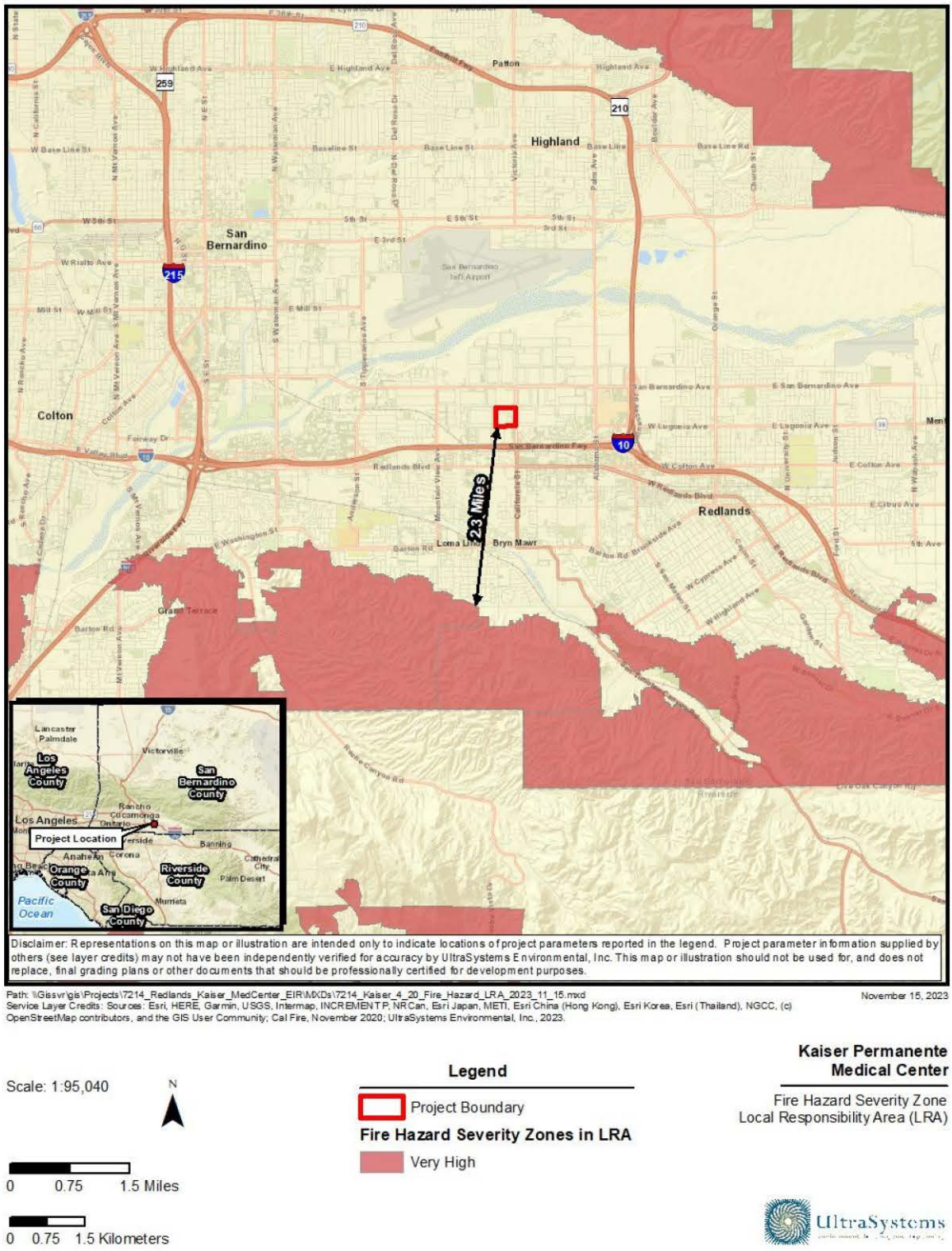


Figure 4.20-2
FIRE HAZARD SEVERITY ZONES IN LOCAL RESPONSIBILITY AREAS



b) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact

As indicated under item a), above the project site is not located in or near either a SRA or a VHFHSZ within a LRA. The proposed project would not "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" and as such would have no impact. This topic will not be discussed further in the PEIR.

c) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact

As indicated under item a), above the project site is not located in or near either a SRA or a VHFHSZ within a LRA. The proposed project would not "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" and as such would have no impact. This topic will not be discussed further in the PEIR.

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

As indicated under item a), above the project site is not located in or near either a SRA or a VHFHSZ within a LRA. The proposed project would not "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" and as such would have no impact. This topic will not be discussed further in the PEIR.

4.21 Mandatory Findings of Significance

Would the project have:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	**X**			
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)?	**X**			
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	**X**			

a) Would the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Potentially Significant Impact

The 37-acre project site in Redlands is situated within the East Valley Corridor Specific Plan under Concept Plan No. 1. Positioned in the city's northwest region, within the West End Planning Area of the Redlands General Plan, the site includes a 120,000 square foot facility and a surface parking lot for the Kaiser Permanente Redlands Medical Offices. The remainder of the site is vacant. Further biological and cultural resources studies are needed to fully evaluate the potential impacts on rare or endangered species, plant or animal communities, and examples of California history and/or prehistory. These topics will be analyzed in the PEIR to be prepared for the project.

b) Would 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)?

Potentially Significant Impact

Projects that may potentially cause individual impacts may also create cumulative impacts. Therefore, the proposed project may have individually limited, but cumulatively considerable impacts, requiring further detailed analysis in the forthcoming PEIR for the project.

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

Potentially Significant Impact

The proposed project presents numerous potentially significant impacts that may affect human beings in areas such as air quality, greenhouse gas emissions, and other hazards. Therefore, a more comprehensive and detailed analysis of this issue is justified and will be incorporated into the PEIR to be prepared for the project.

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6.3 UltraSystems Environmental, Inc.

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