INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION

913 CALIFORNIA STREET, THE COMMONS AT CALIFORNIA PROJECT

CITY OF REDLANDS

SAN BERNARDINO COUNTY, CALIFORNIA

LSA

June 2025

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913 CALIFORNIA STREET, THE COMMONS AT CALIFORNIA PROJECT

CITY OF REDLANDS

SAN BERNARDINO COUNTY, CALIFORNIA

Prepared for:

City of Redlands
Development Services Department, Planning Division
35 Cajon Street, Suite 20
Post Office Box 3005
Redlands, California 92373
(909) 798-7555

Prepared by:

LSA Associates, Inc.
1500 Iowa Avenue, Suite 200
Riverside, California 92507
(951) 781-9310

Project No.20242064

LSA

June 2025

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ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
ADT	average daily traffic
af	acre-feet
afy	acre-feet per year
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
Basin	South Coast Air Basin
Basin Plan	Water Quality Control Plan
bgs	below ground surface
BMP	Best Management Practice
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CALGreen Code	California Green Building Standards Code
California Register	California Register of Historical Resources
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CH_4	Methane
City	City of Redlands
CNEL	Community Noise Equivalent Level

CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CPUC	California Public Utilities Commission
CPUC Strategic Plan	CPUC's Energy Efficiency Strategic Plan
CUP	Conditional Use Permit
DA	drainage area
dB	Decibel
dBA	A-weighted decibel
DCV	Design Capture Volume
DIF	Development Impact Fee
DMA	drainage management area
DTSC	California Department of Toxic Substances Control
EIR	Environmental Impact Report
EMFAC2021	California Air Resources Board Emissions Factor 2021 Model
ESA	Environmental Site Assessment
ESL	environmental screening level
EV	electric vehicle
EV/CG	General Commercial within the East Valley Corridor Specific Plan Area
EW	east-west
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GHG	greenhouse gas
GSP	Groundwater Sustainability Plan
HHD	heavy heavy-duty

HREC	historical recognized environmental condition
HVAC	heating, ventilation, and air conditioning
I-10	Interstate 10
IEPR	Integrated Energy Policy Report
in/sec	inches per second
IRUWMP	Integrated Regional Urban Water Management Plan
IS	Initial Study
IS/MND	Initial Study/Mitigated Negative Declaration
kBTU	thousand British thermal units
kWh	kilowatt hours
L_{eq}	equivalent continuous sound level
LID	Low Impact Development
L_{max}	maximum instantaneous noise level
L_{min}	minimum measured sound level
LOS	level(s) of service
LRA	Local Responsibility Area
LST	Localized Significance Threshold
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
mgd	million gallons per day
MHD	medium heavy-duty
MLD	Most Likely Descendant
MM	Mitigation Measure
MND	Mitigated Negative Declaration
MS4	Municipal Separate Storm Sewer System
MT	metric ton(s)
MT CO_2e	metric tons of carbon dioxide equivalent

N/m^2	micro-Newton per square inch meter
N_2O	nitrous oxide
NAHC	Native American Heritage Commission
ND	Negative Declaration
NO_2	nitrogen dioxide
NOI	Notice of Intent
Non-VHFHSZ	Non-Very High Fire Hazard Severity Zone
NO_x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NS	north-south
OSWER	Office of Solid Waste and Emergency Response
O_3	Ozone
Pb	lead
PCE	perchloroethylene
PM_{10}	particulate matter less than 10 microns in size
$PM_{2.5}$	particulate matter less than 2.5 microns in size
PPV	peak particle velocity
PRC	Public Resources Code
PRDs	Permit Registration Documents
PRIMP	Paleontological Resources Impact Mitigation Program
project/proposed project	913 California Street Project
RCM	Regulatory Compliance Measure
REC	recognized environmental condition
RFD	Redlands Fire Department
RLs	reporting limits
RMS	root-mean-square

ROG	reactive organic gas
RPD	Redlands Police Department
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RUSD	Redlands Unified School District
RWQCB	Regional Water Quality Control Board
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SENEL	single event noise exposure level
SGMA	Sustainable Groundwater Management Act
SLF	Sacred Lands File
SMARTS	Stormwater Multiple Application and Report Tracking System
SO_2	sulfur dioxide
SoCalGas	Southern California Gas Company
SO_x	sulfur oxides
SR-330	State Route 330
SR-38	State Route 38
SRA	Source Receptor Area
State CEQA Guidelines	State of California *Guidelines for Implementation of the California Environmental Quality Act*
SVP	Society of Vertebrate Paleontology
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TIA	Traffic Impact Analysis
TMDL	Total Maximum Daily Load
TPA	transit priority area

USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
UWMP	Urban Water Management Plan
VdB	vibration velocity decibels
VMT	vehicle miles traveled
VOCs	volatile organic compounds
WDID	Waste Discharge Identification Number
WQMP	Water Quality Management Plan
µPa	micro-Pascal

1.0 INTRODUCTION AND PURPOSE

1.1 INTRODUCTION

Chapter 1.0 of this Initial Study (IS) describes the purpose, environmental authorization, the intended uses of the IS, documents incorporated by reference, and the processes and procedures governing the preparation of the environmental document. Pursuant to Section 15367 of the State of California *Guidelines for Implementation of the California Environmental Quality Act* (*State CEQA Guidelines*), the City of Redlands (City) is the Lead Agency under the California Environmental Quality Act (CEQA). The City has primary responsibility for compliance with CEQA and consideration of the 913 California Street Project (herein referred to as "project" or "proposed project").

The IS is organized as follows:

Chapter 1.0 *Introduction and Purpose* provides a discussion of the Initial Study's purpose, focus, and legal requirements.

Chapter 2.0 *Project Description* provides a detailed description of the proposed project.

Chapter 3.0 *Initial Study Checklist* includes a checklist and accompanying analyses of the project's effect on the environment. For each environmental issue, the analysis identifies the level of the project's environmental impact.

Chapter 4.0 *References* details the references cited throughout the document.

Appendices Include the technical material prepared to support the analyses contained in the IS.

1.2 PURPOSE

CEQA requires that the proposed project be reviewed to determine the environmental effects that would result if the project were approved and implemented. The City is the Lead Agency and has the responsibility for preparing and adopting the associated environmental document prior to consideration of the approval of the proposed project. The City has the authority to make decisions regarding discretionary actions relating to implementation of the proposed project.

This IS has been prepared in accordance with the relevant provisions of CEQA (California Public Resources Code [PRC] Section 21000 et seq.), the *State CEQA Guidelines,*[1] and the rules, regulations, and procedures for implementing CEQA as adopted by the City. The objective of the IS is to inform City decision-makers, representatives of other affected/responsible agencies, the public, and interested parties of the potential environmental consequences of the project.

As established in *State CEQA Guidelines* Section 15063(c), the purposes of an IS are to:

- Provide the Lead Agency (City of Redlands) with information to use as the basis for deciding whether to prepare an Environmental Impact Report (EIR), Negative Declaration (ND), or Mitigated Negative Declaration (MND);

[1] California Code of Regulations, Title 14, Chapter 3, Sections 15000 through 15387.

- Enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for an ND or MND;
- Assist in the preparation of an EIR, if one is required;
- Facilitate environmental assessment early in the design of a project;
- Provide a factual basis for finding in an ND or MND that a project will not have a significant effect on the environment;
- Eliminate unnecessary EIRs; and
- Determine whether a previously prepared EIR could be used with the project.

1.3 INTENDED USE OF THIS INITIAL STUDY

The City formally initiated the environmental process for the proposed project with the preparation of this IS. The IS screens out those impacts that would be less than significant and do not warrant mitigation, while identifying those issues that require further mitigation to reduce impacts to a less than significant level. As identified in the following analyses, project impacts related to various environmental issues either do not occur, are less than significant (when measured against established significance thresholds), or have been rendered less than significant through implementation of mitigation measures. Based on these analytical conclusions, this IS supports adoption of an MND for the proposed project.

CEQA[2] permits the incorporation by reference of all or portions of other documents that are generally available to the public. The IS has been prepared utilizing information from City planning and environmental documents, technical studies specifically prepared for the project, and other publicly available data. The documents utilized in the IS are identified in Chapter 3.0 and are hereby incorporated by reference. These documents are available for review at the City of Redlands, Planning Division.

1.4 PUBLIC REVIEW OF THE INITIAL STUDY

The IS and a Notice of Intent (NOI) to adopt an MND will be distributed to responsible and trustee agencies, other affected agencies, and other parties for a 30-day public review period. Written comments regarding this IS should be addressed to:

Sean Reilly, Principal Planner
City of Redlands
35 Cajon Street, Suite 20
P.O. Box 3005
Redlands, CA 92373
sreilly@cityofredlands.org

After the 30-day public review period, consideration of comments raised during the public review period will be taken into account and addressed prior to adoption of the MND by the City.

[2] *State CEQA Guidelines* Section 15150.

2.0 PROJECT DESCRIPTION

This chapter describes the proposed 913 California Street, The Commons at California Project (project), which is the subject of this Initial Study/Mitigated Negative Declaration (IS/MND) prepared pursuant to the California Environmental Quality Act (CEQA). The proposed project includes the construction of a 90-room business hotel, a 1,450-square-foot coffee shop, a 3,588-square-foot express-style car wash, and associated parking on a 5.1-acre property at 913 California Street in Redlands, California, that consists of two undeveloped parcels (Assessor's Parcel Numbers [APNs] 292-034-10 and -17).

Pursuant to Section 15124(c) of the *State CEQA Guidelines*, this chapter includes a description of the proposed project's location, objectives, and a description of the project's technical, economic, and environmental characteristics, which is followed by a summary of the intended uses of the IS/MND, a list of required permits and other approvals required to implement the project, and a list of related environmental review and consultation requirements required by federal, State, and local laws, regulations, or policies.

2.1 PROJECT LOCATION

The following describes the precise location and boundaries of the project site, including its geographic context, and provides a brief overview of the existing land uses within and in the vicinity of the project site.

2.1.1 Regional Location and Access

The 5.1-acre project site is at 913 California Street in Redlands, San Bernardino County, California. The irregularly shaped project site is bounded by a flood control channel, Mission Channel, along the southwestern site boundary, California Street to the east, and a railroad line to the north. The nearest arterial streets to the project site include California Street and Redlands Boulevard, located directly east and approximately 200 feet south of the project site, respectively. The City of Loma Linda is directly southwest of the project site. **Figure 2-1: Regional Location and Project Vicinity**, depicts the project site's location within the region.

Interstate 10 (I-10) facilitates regional access to the project site. I-10, an east-to-west-running regional highway in Southern California, runs approximately 160 feet north of the project site and provides direct access to the project site via the California Street interchange immediately northeast of the project site. In addition, the project site is approximately 30 feet south of a railroad line. The closest Metrolink stations are the Tippecanoe and Esri stations, approximately 2 miles northwest and 2 miles southeast, respectively.

2.1.2 Site Characteristics and Current Site Conditions

The project site is currently undeveloped, triangular in shape, and generally flat. Conditions on the site consist of disturbed vegetation, soils, and power utility poles. An existing gas station is adjacent to the northeast corner of the project site. Overhead utility lines border the eastern boundary of the site, and an existing storm drain is near the southeast corner. Mission Channel separates the project site from the adjacent residential community to the southwest. Unpaved maintenance/access roads exist on both sides of the channel. A railroad line borders the project site to the north, followed by a chain-link fence, rows of orchard trees, and I-10. In addition to being used by the Union Pacific railroad, the railroad line on the north side of the project site is used by the Metrolink and Arrow commuter rail services.

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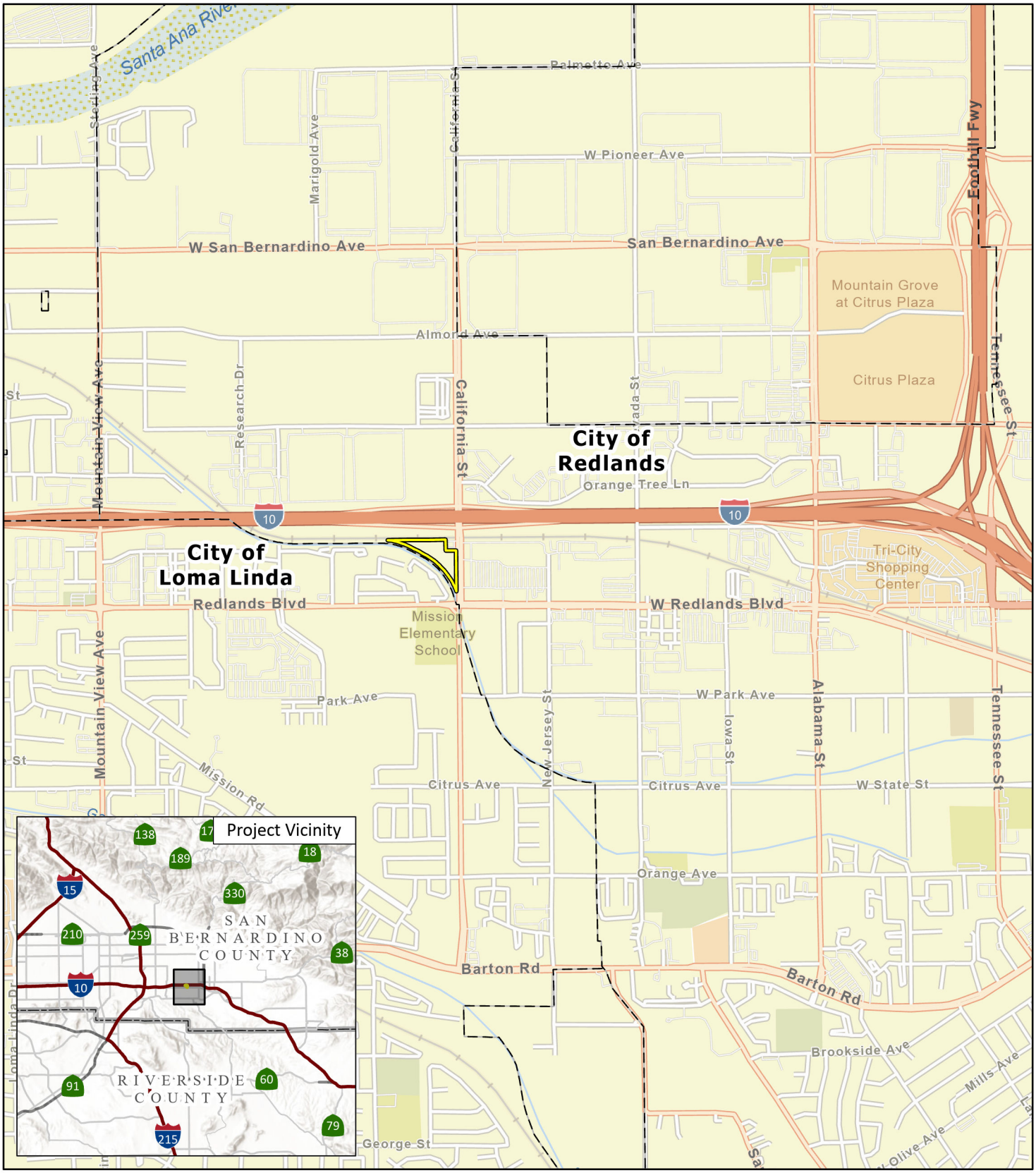

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FIGURE 2-1

SOURCE: Esri World Street Map (2018)

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913 California Street Project

Regional Location and Project Vicinity

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2.1.3 General Plan and Zoning

According to the City's 2035 General Plan Livable Community Element, the project site is currently designated for Commercial uses. The Commercial land use designation is intended for a wide range of commercial uses, including neighborhood-serving stores and convenience centers, regional commercial centers, and commercial recreation. Parcels with this designation may be developed with a stand-alone commercial use, two or more commercial uses, or mixed uses. The Commercial land use designation allows a floor area ratio of 0.3.

The City's Zoning Map designates the project site as General Commercial within the East Valley Corridor Specific Plan Area (EV/CG). Chapter 7 of the East Valley Corridor Specific Plan, which identifies the EV/CG zoning designation, lists permittable uses and conditional uses under the zoning designation. According to Chapter 7, car washes are permitted uses, and drive-through restaurants and hotels are allowed in the EV/CG zone with approval of a conditional use permit.

2.1.4 Surrounding Land Uses

The project site is bounded by Mission Channel along the southwestern site boundary, California Street to the east, and a railroad line to the north. A mix of single- and multi-family residential uses within the City of Loma Linda are located southwest of the project site, across Mission Channel, and commercial uses are located east of California Street. Several rows of orchard trees followed by I-10 are north of the project site, across the railroad line. Commercial/industrial uses exist north of I-10. **Table 2.A: Surrounding Land Uses and Setting** summarizes the existing land uses, General Plan designations, and zoning designations on the project site and surrounding properties and **Figure 2-2: Aerial Photograph of the Project Site and Surrounding Land Uses**, depicts the project site's surrounding land uses.

According to the City's 2035 General Plan and the City of Loma Linda General Plan, surrounding land use designations include Agriculture (City Grove) and Commercial/Industrial to the north, Commercial to the east, and Low Density Residential, High Density Residential, and Open Space to the southwest. According to the City's Zoning Map and the City of Loma Linda Zoning Map, surrounding zoning designations include EV/CG to both the north and east of the project site, and High and Medium Density Residential (R3 and R2), to the southwest.

Table 2.A: Surrounding Land Uses and Setting

Direction	Existing Land Use	General Plan Designation	Zoning Designation
Project Site	Undeveloped, Vacant	Commercial	General Commercial (EV/CG)
North	Railroad line, row of orchard trees, I-10, and commercial/ industrial uses	Agriculture	General Commercial (EV/CG)
		Commercial/Industrial	Planned Development (PD3 and PD7), East Valley Corridor Specific Plan
East	Commercial center, including retail stores, restaurants, and a gas station	Commercial	General Commercial (EV/CG)
Southwest[1]	Mission Channel, residential uses, and undeveloped land	Linear Park	None
		High Density Residential (R3) and Low Density Residential (R1)	High Density Residential (R3) and Low Density Residential (R1)

Sources: Redlands General Plan Land Use Map (City of Redlands, April 11, 2022).
City of Redlands. City of Redlands – Zoning Map. April 11, 2022.
City of Loma Linda. Loma Linda General Plan Land Use Map. May 2009.
City of Loma Linda. City of Loma Linda Zoning Map. February 9, 2021.
[1] Properties southwest of the project site, excluding Mission Channel, are within Loma Linda.

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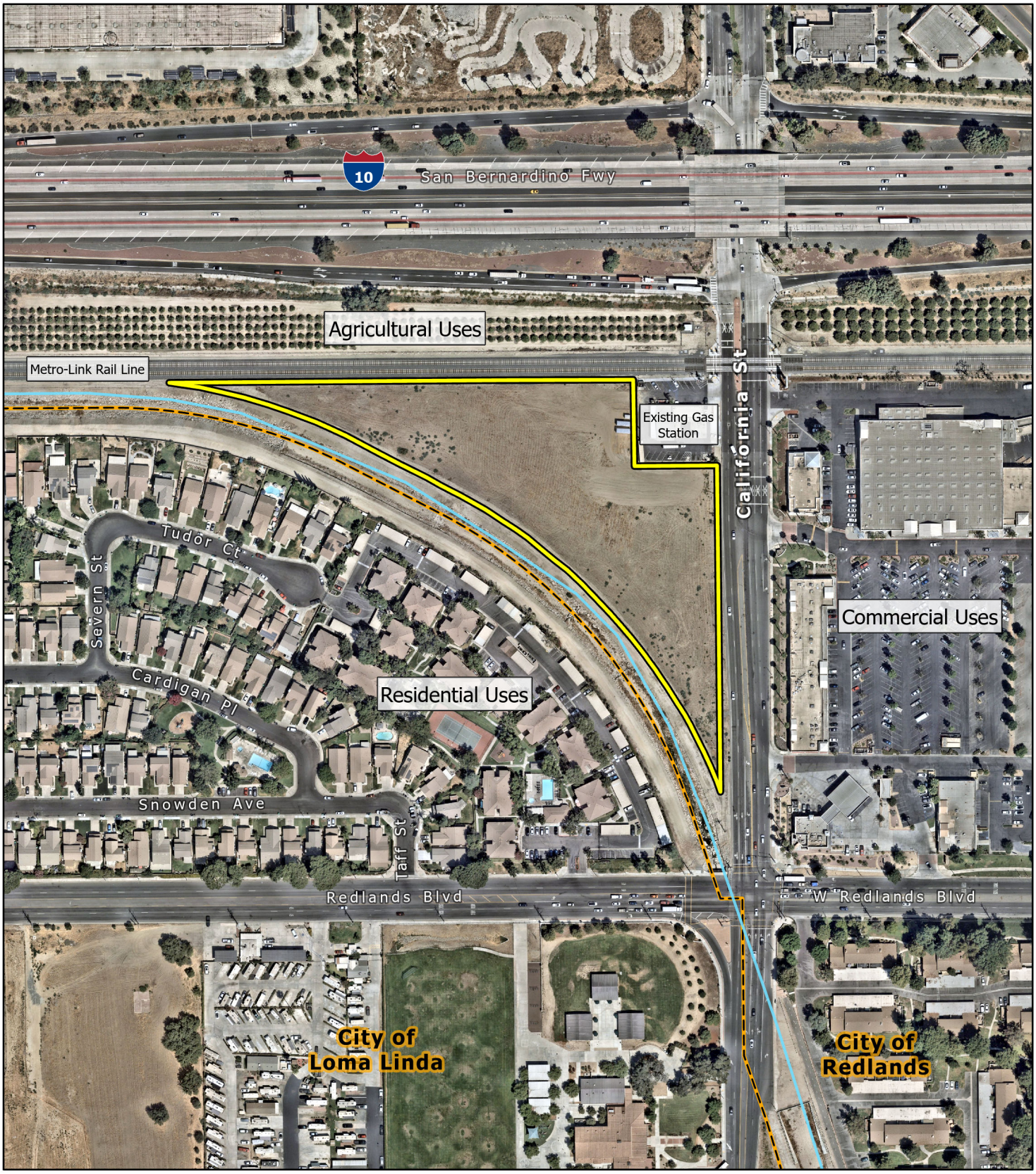

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Project Site
City Boundary
Mission Channel

FIGURE 2-2

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SOURCE: Nearmap (8/27/2024)

913 California Street Project

Aerial Photograph of the Project Site and Surrounding Land Uses

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2.2 PROPOSED PROJECT

2.2.1 Overall Development Concept

The proposed project includes the subdivision of the project site into three parcels to facilitate the development of a four story, 55,186-square-foot business hotel containing 90 rooms (Parcel 1), an approximately 1,450-square-foot drive-through coffee shop (Parcel 2), a 3,588-square-foot semi-automated car wash (Parcel 3), and associated circulation, parking, infrastructure, and landscaping improvements on the undeveloped, 5.1-acre project site. **Figure 2-3: Tentative Parcel Map** shows the proposed boundaries of the parcels described above within the project site. **Figure 2-4: Site Plan** shows the locations of each of the proposed project's component uses. The following describes each individual component of the mixed-use project.

The proposed hotel building would have a maximum height of 58 feet, including the parapet, and would include a lobby, dining area, bar area, business center, meeting room, fitness center, prep areas and market, commercial laundry, utility room, storage rooms, pool equipment and elevator equipment rooms, bedrooms, and associated operational areas. The total building area would be 55,186 square feet with 41,307 square feet dedicated to guestrooms. The proposed hotel would include 119 parking spaces and a loading zone near the northeast corner of the hotel. In addition, the hotel would include two trash enclosures, one of which would be located at the northeast corner of the hotel, and the second, smaller enclosure would be located in the southeast corner of the hotel's parking area. Proposed outdoor amenities would include an outdoor pool with restrooms, an outdoor lounging area near the southeast corner, and a large porte cochere for loading and unloading of hotel guests and their personal belongings.

The proposed coffee shop would consist of a single tenant drive-through building, totaling approximately 1,450 square feet with a maximum building height of 22 feet. The proposed drive-through coffee shop would include a small outdoor patio on the east side of the building and the drive through would include room for approximately 14 cars at a time. A total of 14 parking spaces would be associated with the drive through coffee shop. The proposed coffee shop would be open from 6 a.m. to 9 p.m. every day. The proposed car wash would consist of a single tenant drive through building, totaling 3,588 square feet with a maximum height of 26 feet. The proposed car wash would include a check-in area for payment and the drive-through would include space for approximately 15 cars at a time. All mechanical equipment associated with car wash activities would be located within the proposed building. In addition, a trash enclosure would be located at the northwest corner of the car wash. A total of 22 parking spaces would be associated with the drive-through car wash, many of which would include vacuums. The proposed car wash would be open from 7 a.m. to 7 p.m. every day.

Other site improvements include a new main signalized entrance, a secondary right-in/right-out entrance, a new street connection from the main entrance to the proposed car wash, a drainage basin at the northwest corner of the site, retaining walls along Mission Channel at the west side of the project site, landscaping, drive aisles, pedestrian walkways, and trash enclosures.

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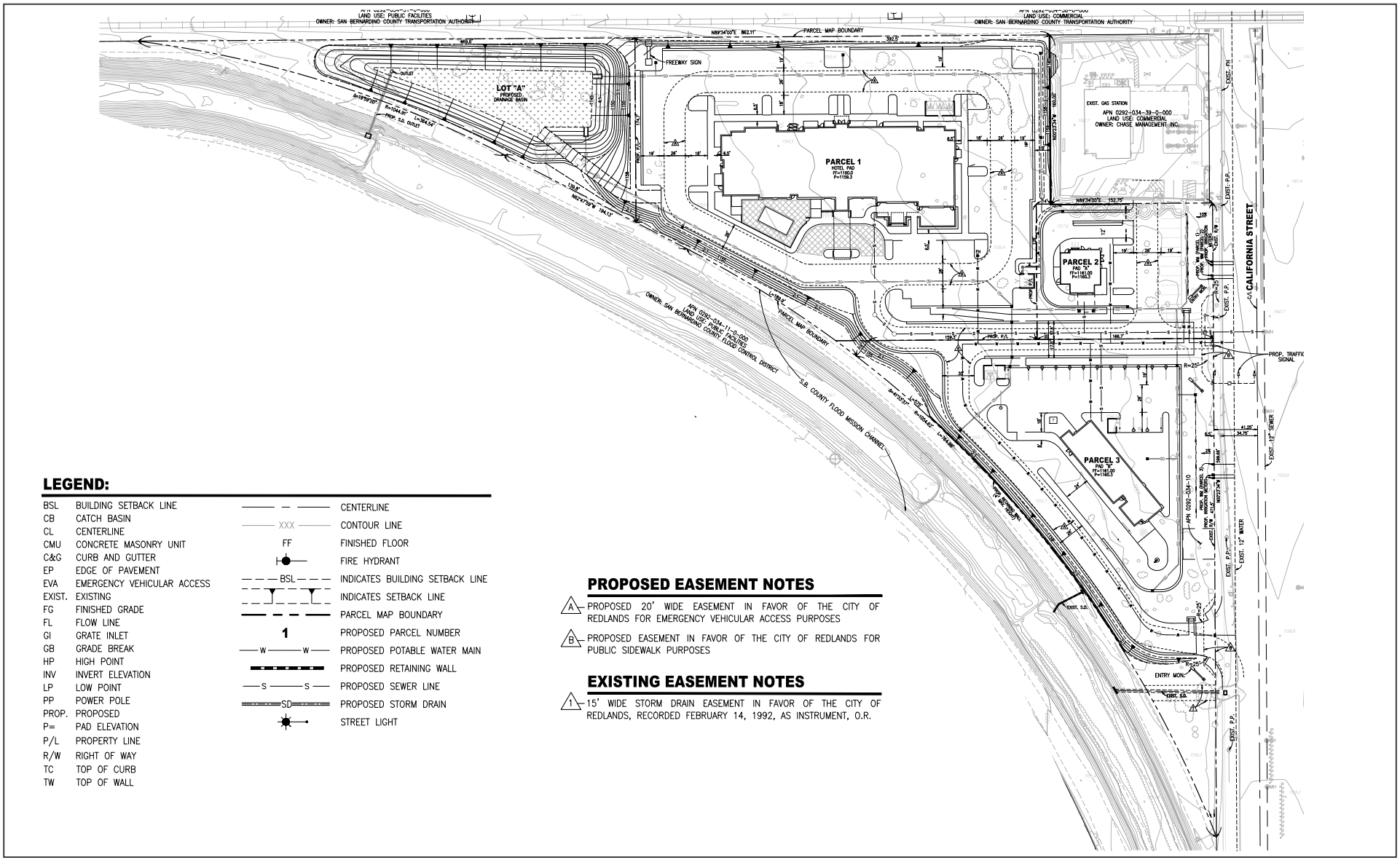

LEGEND:

BSL	BUILDING SETBACK LINE
CB	CATCH BASIN
CL	CENTERLINE
CMU	CONCRETE MASONRY UNIT
C&G	CURB AND GUTTER
EP	EDGE OF PAVEMENT
EVA	EMERGENCY VEHICULAR ACCESS
EXIST.	EXISTING
FG	FINISHED GRADE
FL	FLOW LINE
GI	GRATE INLET
GB	GRADE BREAK
HP	HIGH POINT
INV	INVERT ELEVATION
LP	LOW POINT
PP	POWER POLE
PROP.	PROPOSED
P=	PAD ELEVATION
P/L	PROPERTY LINE
R/W	RIGHT OF WAY
TC	TOP OF CURB
TW	TOP OF WALL

CENTERLINE	
XXX	CONTOUR LINE
FF	FINISHED FLOOR
	FIRE HYDRANT
BSL	INDICATES BUILDING SETBACK LINE
	INDICATES SETBACK LINE
	PARCEL MAP BOUNDARY
1	PROPOSED PARCEL NUMBER
W	PROPOSED POTABLE WATER MAIN
	PROPOSED RETAINING WALL
S	PROPOSED SEWER LINE
SD	PROPOSED STORM DRAIN
	STREET LIGHT

PROPOSED EASEMENT NOTES

A PROPOSED 20' WIDE EASEMENT IN FAVOR OF THE CITY OF REDLANDS FOR EMERGENCY VEHICULAR ACCESS PURPOSES

B PROPOSED EASEMENT IN FAVOR OF THE CITY OF REDLANDS FOR PUBLIC SIDEWALK PURPOSES

EXISTING EASEMENT NOTES

1 15' WIDE STORM DRAIN EASEMENT IN FAVOR OF THE CITY OF REDLANDS, RECORDED FEBRUARY 14, 1992, AS INSTRUMENT, O.R.

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FIGURE 2-3

N

0 60 120

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SOURCE: Sp2 & Co.

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913 California Street Project

Tentative Parcel Map

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REFERENCE NOTES

101. NOT USED
102. 30' WIDE LANDSCAPE EASEMENT
103. RAILROAD TRACKS
104. EXISTING DRAINAGE CHANNEL
105. EXISTING DIRT ROAD
106. EXISTING CURB GUTTER AND SIDEWALK, TO BE IMPROVED AS PART OF ON-GOING CITY IMPROVEMENT PROJECT.
107. EXISTING DRAINAGE INLET, TO BE MODIFIED.
108. EXISTING UTILITY POLE TO BE RELOCATED
109. EXISTING STREET LIGHT TO REMAIN.
110. EXISTING FIRE HYDRANT, TO REMAIN.
111. EXISTING MEDIAN TO REMAIN
112. ORCHARD

114. EXISTING FENCE TO REMAIN
115. EXISTING 15' WIDE DRAINAGE EASEMENT
116. PROPOSED PARCEL LINE, REFER TO PARCEL MAP

150. FUTURE SIGNALIZED INTERSECTION
151. CITY ROAD IMPROVEMENTS, NOT A PART
151.A. CURB GUTTER AND SIDEWALK
151.B. CURB RAMP
151.C. PEDESTRIAN CROSSING
151.D. MODIFIED DRAIN INLET, SEE CIVIL PLANS
152. MAIN SITE ENTRANCE
153. SECONDARY SITE ENTRANCE (RIGHT IN RIGHT OUT)
156. PROPOSED BUILDING, SEE FLOOR PLAN
157. LOADING AREA
158. ACCESSIBLE PARKING SPACE (9'x19').
159. STANDARD PARKING (9'x19')
160. COMPACT PARKING (9'x16')
161. HOTEL CHECK IN SPACE (9'x19')
162. CONCRETE WALK, REFER TO CIVIL AND LANDSCAPE PLANS.
163. PEDESTRIAN CROSSING, SEE CIVIL AND LANDSCAPE PLANS.
164. CONCRETE CURB RAMP, REFER TO CIVIL PLANS
165. ZERO CURB AT PORTE COCHERE, SEE CIVIL PLANS
166. LANDSCAPE AREA, REFER TO LANDSCAPE PLANS
167. DRAINAGE BASIN, SEE CIVIL PLANS
168. HOTEL PORTE COCHERE WITH DECORATIVE PAVING
169. HOTEL POOL
170. POOL RESTOOMS, SEE FLOOR PLAN
171. POOL EQUIPMENT ROOM
172. HOTEL OUTDOOR SPACE.
173. 6' TALL FENCE WITH PRIVACY SCREEN AT POOL
174. TRASH ENCLOSURE, SEE PLAN
175. FIRE LANE. TO CONFORM WITH FIRE CODE AND LOCAL REQ'S INCLUDING:
- PATH SHALL BE 20' CLEAR
- 20' INSIDE TURNING RADIUS
- 40' OUTSIDE RADIUS

176. VACUUM SPACES (9'X19' SPACE WITH 4' WIDE VACUUM SPACE)
177. ACCESSIBLE VACUUM SPACE (9'x19' WITH 8' WIDE ACCESS SPACE)
178. CARWASH EQUIPMENT ENCLOSURE.
179. FLAGPOLE
180. CARWASH CHECK-IN KIOSK
181. EMERGENCY GENERATOR
182. MOTORCYCLE PARKING (4'X8')
183. EV SPACE (9'x19'), PER CGBC TABLE 5.106.5.3.1
184. VAN ACCESSIBLE EV SPACE (9'x19'), PER CGBC TABLE 5.106.5.3.1
185. EV CAPABLE SPACE (9'x19'), PER CGBC TABLE 5.106.5.3.1
186. SHORT TERM BICYCLE PARKING
187. LONG TERM BICYCLE PARKING
188. MONUMENT SIGN, UNDER SEPARATE COVER.
189. FREEWAY ORIENTED SIGN, UNDER SEPARATE COVER.
191. COMBINATION WALL AT GAS STATION, TUBULAR STEEL OVER CMU. HEIGHT TO BE DETERMINED.
192. OVERFLOW PARKING
193. VAN POOL SPACE PER RMC 18.224.010 (E).
194. PASSENGER LOADING AREA (110' LINEAR SPACE), PER RMC 18.224.010 (D).
195. EMPLOYEE PARKING. HALF OF THESE SPACES WILL BE UTILIZED AS RIDESHARE SPACES PER RMC 18.224.010 (L).
196. PROPOSED ELECTRICAL TRANSFORMER
197. CAR WASH DIRECTIONAL SIGNAGE

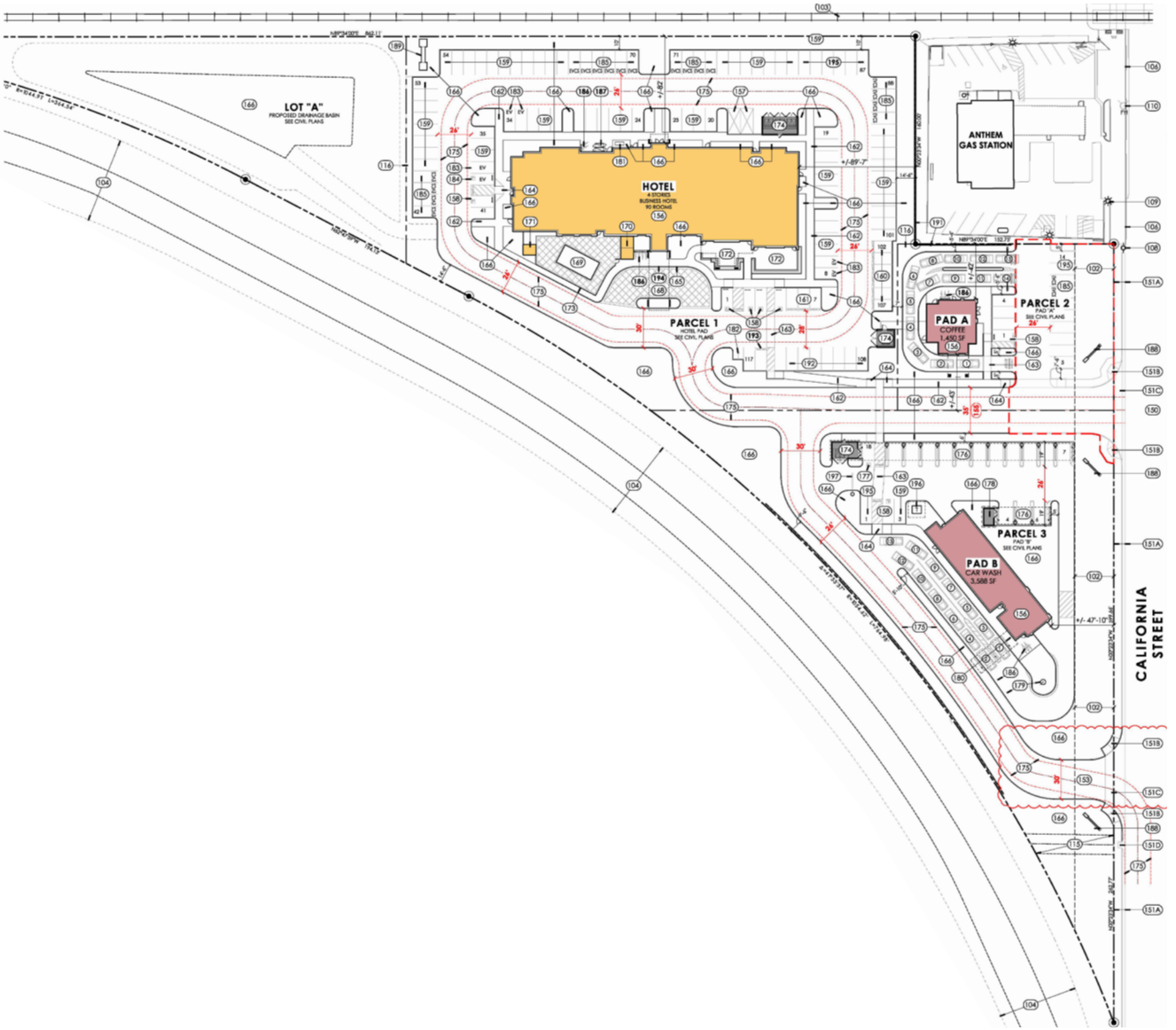

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FIGURE 2-4

0 60 120
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SOURCE: Steve Rigor Design

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913 California Street Project
Site Plan

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The proposed project would include fencing along the project site boundaries, consisting primarily of 8-feet-high tubular steel fencing and 6-feet-high tubular steel fencing. The 8-feet-high tubular steel fencing would be located along the northern project site boundary, separating the project site from the adjacent rail line. This fence would also include an emergency access gate consistent with Redlands Fire Department specifications. The 6-feet-high tubular steel fencing would be located along the southwest project site boundary, separating the project site from Mission Channel, and the southeast project site boundary. The proposed project also includes a combination 6-foot-high tubular steel/concrete masonry unit wall along the project site's boundary with the existing gas station in the northeast corner of the project site.

The discretionary actions required for the proposed project include issuance of a Conditional Use Permit, approval of a Tentative Parcel Map, and the related actions listed in Section 2.3, Required Permits and Approvals.

2.2.2 Construction and Phasing

Construction of the proposed project would include site preparation, installation of utilities, paving, building construction, landscaping, and architectural coating activities. The proposed project would be constructed over approximately 13 months, with construction anticipated to begin in late 2025. Construction activities are anticipated between the hours of 7:00 a.m. and 6:00 p.m. Monday through Saturday. This is consistent with the City's Noise Ordinance, which prohibits the operation of construction equipment between the hours of 6:00 p.m. and 7:00 a.m. weekdays and Saturdays.

The preliminary proposed project construction phasing is presented below in **Table 2.B: Preliminary Project Construction Phasing.**

Table 2.B: Preliminary Project Construction Phasing

Phase	Begin Date	End Date
Site Preparation	October 1, 2025	October 8, 2025
Grading	October 9, 2025	October 20, 2025
Building Construction	October 21, 2025	September 8, 2026
Paving	September 9, 2026	October 4, 2026
Architectural Coating	October 5, 2026	October 30, 2026

Source: MD Acoustics, LLC (2024).

Construction of the proposed project is anticipated to require excavation to a maximum depth 15 feet for construction of utilities and drainage facilities. The entire 5.1-acre project site is anticipated to be disturbed during construction activities. Grading of the project site would result in approximately 5,000 cubic yards of cut and require approximately 35,000 cubic yards of fill, requiring the import of approximately 30,000 cubic yards of soil.

2.2.3 Vehicle Access, Site Circulation, and Parking

As previously discussed, vehicular access to the project site would be provided through a new main signalized entrance and secondary right in right out entrance off California Street. The main signalized entrance would be near the center of the eastern side of the project site and the secondary entrance would be at the southeast corner of the project site. In addition, a new street connection from the main entrance would provide access to the proposed car wash. Drive aisles, specifically for the hotel and coffee

shop, would facilitate traffic circulation throughout the project site. The main signalized entrance would also provide emergency and fire access for first responders.

The proposed project would provide a total of 155 parking spaces, 119 associated with the proposed hotel, 14 associated with the drive-through coffee shop, and 22 associated with the car wash. Of the 155 parking spaces provided by the proposed project, six would be compact spaces, seven would be accessible spaces, one would an accessible electric vehicle (EV) space, 25 would be EV/EV-capable spaces, 2 would be motorcycle parking spaces, two would be loading spaces, 17 would be vacuum spaces (associated with the car wash), one would be an accessible vacuum space, and 96 would be standard spaces. The two loading spaces are not included in the overall parking total or calculations.

Table 2.C: Proposed Vehicle Parking Spaces provides the required number of parking spaces for each project component and summarizes parking spaces provided for project component. As shown in **Table 2.C**, the proposed project would meet the required number of parking spaces.

Table 2.C: Proposed Vehicle Parking Spaces

Parking Spaces	Hotel	Drive-Through Coffee Shop	Car Wash	Total
Standard	82	11	3	96
Compact	6	-	-	6
Accessible	5	1	1	7
EV/EV Capable	23	2	-	25
Accessible EV	1	-	-	1
Motorcycle	2	-	-	2
Vacuum	-	-	17	17
Accessible Vacuum	-	-	1	1
Total Provided	119	14	22	**155**
Required	99	12	3	**114**
Meet Requirements?	**Yes**	**Yes**	**Yes**	**Yes**

Source: Steve Rigor Design (2024).
EV = electric vehicle

In addition to vehicle parking spaces, the proposed project would include 6 bicycle parking spaces, 4 bicycle lockers, and 6 bicycle racks, totaling 16 bicycle spaces. Refer to **Figure 2-4** for a detailed illustration of the proposed roadways and parking configuration on the project site.

2.2.4 Landscaping

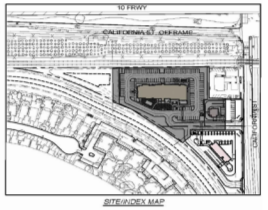
Based on the City of Redlands' Citywide Design Guidelines, the proposed project's plant palette would comprise plant materials and trees known to thrive in the local climate and soil conditions. **Figure 2-5: Landscaping Plan** illustrates the proposed landscaping, detailing the specific plant species to be used. A total of 186 trees would be planted on-site, and all plants would be placed within crushed stone mulch or recycled wood mulch. Locally sourced granite boulders would also be included in the landscaping plan. The proposed project would provide a total of 78,897 square feet of landscaped area (35.7 percent of the project site), which meets the City's landscaping requirements as detailed in the East Valley Corridor Specific Plan Section EV4.0260. **Table 2.D: Landscaping Area** provides a summary of the proposed project's landscaping for each project component.

PLANT SCHEDULE HOTEL/MIXED

SYMBOL	QTY	SIZE	WUCOLS	BOTANICAL NAME	COMMON NAME
TREES					
	36" BOX	LOW		BEAUCARNEA RECURVATA CLUMP/MULTI-STEM FORM	PONY TAIL PALM
	15	15 GAL	LOW	EUCALYPTUS CITRIODORA	LEMON SCENTED GUM
	31	15 GAL	LOW	EUCALYPTUS SIDEROXYLON 'ROSEA'	RED IRONBARK
	19	15 GAL	LOW	GLEDITSIA TRIACANTHOS INERMIS 'SHADEMASTER'	SHADEMASTER LOCUST
	24' BTH	LOW		PHOENIX CANARIENSIS EXCEEDS 48" BOX SIZE	CANARY ISLAND DATE PALM
	89	24" BOX	LOW	PINUS ELDARICA LOW BRANCHED	AFGHAN PINE
	8	24" BOX	LOW	PITTOSPORUM PHILLYRAEOIDES	DESERT WILLOW PITTOSPORUM
	9	15 GAL	MOD	PLATANUS X ACERIFOLIA 'COLUMBIA' LOW BRANCHED	LONDON PLANE TREE
	13	36" BOX	LOW	PROSOPIS ALBA COLORADO	COLORADO MESQUITE
	12' HT.	LOW		SYAGRUS ROMANZOFFIANA EXCEEDS 36" BOX SIZE	QUEEN PALM
STREET TREES					
	10	24" BOX	LOW	ARBUTUS UNEDO SINGLE TRUNK--TREE FORM	STRAWBERRY TREE
	12	24" BOX	LOW	GINKGO BILOBA 'PRINCETON SENTRY'	PRINCETON SENTRY GINKO
	12	24" BOX	LOW	HYMENOSPORUM FLAVUM	SWEETSHADE

PLANT SCHEDULE HOTEL/MIXED

SYMBOL	QTY	SIZE	WUCOS	BOTANICAL NAME	COMMON NAME
SHRUBS					
	34	5 GAL.	LOW	ARTEMISIA X 'POWIS CASTLE'	POWIS CASTLE ARTEMISIA
	78	5 GAL.	LOW	BOUGAINVILLEA BRASILIENSIS 'RASPBERRY ICE'	RASPBERRY ICE BOUGAINVILLEA
	80	5 GAL.	LOW	CAESALPINIA PULCHERRIMA	RED BIRD OF PARADISE
	140	5 GAL.	LOW	CALLISTEMON VIMINALIS 'LITI' TM	BETTER JOHN BOTTLEBRUSH
	4	5 GAL.	LOW	CUPRESSUS SEMPERVIRENS 'MONSHEL'	TINY TOWER® ITALIAN CYPRESS
	28	15 GAL	LOW	JUNIPERUS SCOPULORUM 'WICHITA BLUE'	WICHITA BLUE JUNIPER
	65	5 GAL.	LOW	LEUCOPHYLLUM CANDIDUM 'THUNDER CLOUD'	THUNDER CLOUD TEXAS SAGE
	26	5 GAL.	LOW	LEUCOPHYLLUM FRUTESCENS	TEXAS SAGE
	42	5 GAL.	LOW	PLUMBAGO AURICULATA 'MONOTT'	ROYAL CAPE® PLUMBAGO
GRASSES					
	125	1 GAL.	LOW	LOMANDRA LONGIFOLIA 'BREEZE' TM	BREEZE MAT RUSH
SHRUB COVER					
	202	1 GAL.	LOW	ACACIA REDOLENS 'LOW BOY'	LOW BOY BANK CATCLAW
	250	1 GAL.	LOW	LANTANA MONTEVIDENSIS 'LAVENDER'	LAVENDER LANTANA
	108	1 GAL.	LOW	LANTANA X 'TEENIE GENIE'	TEENIE GENIE LANTANA
SUCCULENTS					
	152	1 GAL.	LOW	ALOE RUDIKOPPIE 'LITTLE GEM'	LITTLE GEM ALOE
	54	5 GAL.	LOW	HESPERALOE PARVIFLORA	RED YUCCA
SYMBOL	QTY	SIZE	WUCOLS	BOTANICAL NAME	COMMON NAME
GROUND COVERS					
	27,543 SF	HYDROSEED	LOW	LOW GROWING, NATIVE PLANTINGS FOR BASIN EROSION CONTROL	



SITE/INDEX MAP

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FIGURE 2-5
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SOURCE: STB Lanscape Architects

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913 California Street Project
Landscaping Plan

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PLANT SCHEDULE HOTEL/MIXED

SYMBOL	QTY	SIZE	WUCOLS	BOTANICAL NAME	COMMON NAME
TREES					
	36" BOX	LOW		BEAUCARNEA RECURVATA CLUMP/MULTI-STEM FORM	PONY TAIL PALM
	16	15 GAL	LOW	EUCALYPTUS CITRIODORA	LEMON SCENTED GUM
	31	15 GAL	LOW	EUCALYPTUS SIDEROXYLON "ROSEA"	RED IRONBARK
	19	15 GAL	LOW	GLEDITSIA TRIACANTHOS INERMIS "SHADEMASTER"	SHADEMASTER LOCUST
	24" BTH	LOW		PHOENIX CANARIENSIS EXCEEDS 48" BOX SIZE	CANARY ISLAND DATE PALM
	59	24" BOX	LOW	PINUS ELDARICA LOW BRANCHED	AFGHAN PINE
	8	24" BOX	LOW	PITTOSPORUM PHILLYRAEOIDES	DESERT WILLOW PITTOSPORUM
	9	15 GAL	MOD	PLATANUS X ACERIFOLIA 'COLUMBIA' LOW BRANCHED	LONDON PLANE TREE
	13	36" BOX	LOW	PROSOPIS ALBA COLORADO	COLORADO MESQUITE
	12' HT.	LOW		SYAGRUS ROMANZOFFIANA EXCEEDS 36" BOX SIZE	QUEEN PALM
STREET TREES					
	10	24" BOX	LOW	ARBUTUS UNEDO SINGLE TRUNK-TREE FORM	STRAWBERRY TREE
	12	24" BOX	LOW	GINKGO BILOBA "PRINCETON SENTRY"	PRINCETON SENTRY GINGKO
	12	24" BOX	LOW	HYMENOSPORUM FLAVUM	SWEETSHADE

PLANT SCHEDULE HOTEL/MIXED

SYMBOL	QTY	SIZE	WUCOLS	BOTANICAL NAME	COMMON NAME
SHRUBS					
	34	5 GAL.	LOW	ARTEMISIA X 'POWIS CASTLE'	POWIS CASTLE ARTEMISIA
	78	5 GAL.	LOW	BOUGAINVILLEA BRASILIENSIS 'RASPBERRY ICE'	RASPBERRY ICE BOUGAINVILLEA
	80	5 GAL.	LOW	CAESALPINIA PULCHERRIMA	RED BIRD OF PARADISE
	140	5 GAL.	LOW	CALLISTEMON VIMINALIS 'LITT' TM	BETTER JOHN BOTTLEBRUSH
	4	5 GAL.	LOW	CUPRESSUS SEMPERVIRENS 'MONSHEL'	TINY TOWER® ITALIAN CYPRESS
	28	15 GAL	LOW	JUNIPERUS SCOPULORUM 'WICHITA BLUE'	WICHITA BLUE JUNIPER
	65	5 GAL.	LOW	LEUCOPHYLLUM CANDIDUM 'THUNDER CLOUD'	THUNDER CLOUD TEXAS SAGE
	26	5 GAL.	LOW	LEUCOPHYLLUM FRUTESCENS	TEXAS SAGE
	42	5 GAL.	LOW	PLUMBAGO AURICULATA 'MONOTT'	ROYAL CAPE® PLUMBAGO
GRASSES					
	125	1 GAL.	LOW	LOMANDRA LONGIFOLIA 'BREEZE' TM	BREEZE MAT RUSH
SHRUB COVER					
	202	1 GAL.	LOW	ACACIA REDOLENS 'LOW BOY'	LOW BOY BANK CATCLAW
	250	1 GAL.	LOW	LANTANA MONTEVIDENSIS 'LAVENDER'	LAVENDER LANTANA
	108	1 GAL.	LOW	LANTANA X 'TEENIE GENIE'	TEENIE GENIE LANTANA
SUCCULENTS					
	152	1 GAL.	LOW	ALOE RUDIKOPPE 'LITTLE GEM'	LITTLE GEM ALOE
	54	5 GAL.	LOW	HESPERALOE PARVIFLORA	RED YUCCA
SYMBOL	QTY	SIZE	WUCOLS	BOTANICAL NAME	COMMON NAME
GROUND COVERS					
	27,543 SF	HYDROSEED	LOW	LOW GROWING, NATIVE PLANTINGS FOR BASIN EROSION CONTROL	

SITE/INDEX MAP

LSA

FIGURE 2-5
Page 2 of 2

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SOURCE: STB Lanscape Architects

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913 California Street Project
Landscaping Plan

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Table 2.D: Landscaping Area

Project Component	Area (sf)	Landscaped Area	
		Required (sf)	Provided (sf)
Lot A[1]	32,670	6,534	25,332
Hotel	100,190	20,038	20,928
Drive-Through Coffee Shop	21,244	4,249	5,152
Car Wash	67,082	13,416	27,485
		Total Landscape Area	**78,897 (35.7 of Project Site)**

Source: Steve Rigor Design (2024).

[1] Lot A would be located in the northwest corner of the project site would be the location of the proposed infiltration basin, Basin A. See **Figure 2-3: Tentative Parcel Map** and Section 2.2.6.3, Stormwater, below.

sf = square feet

Proposed landscaping on-site would be consistent to the landscaping characteristics of surrounding commercial uses and would complement the proposed development and surrounding area.

2.2.5 Lighting

The proposed project would include on-site lighting through the project site for visibility and safety. Lighting would be consistent with the East Valley Specific Plan's Guidelines and would be generally shielded to prevent light spillage onto adjacent properties. In addition, shielded lights and a photometric study would be required under the conditions of approval for the proposed project.

2.2.6 Infrastructure and Utilities

The project site is in an urbanized area, and existing utilities and infrastructure are available for interconnection generally adjacent to or close to the project site. The proposed project would include the installation of the following utility connections to the satisfaction of the applicable utility providers: water, wastewater, stormwater drainage, electric, natural gas, and telecommunications. Connections to existing utility infrastructure would be within the adjacent public rights-of-way. In general, the depths of utility improvements would range from approximately 3 feet to 15 feet below ground surface.

2.2.6.1 Water

Domestic water service to the project site would be provided via separate service lateral connections to an existing 12-inch water line in California Street. These connections would split in four directions on the project site, providing water to the proposed coffee shop, hotel, and car wash, and running beneath the proposed secondary right-in/ right-out entrance.

2.2.6.2 Wastewater

Sewer service to the project site would be provided via a sewer line beneath the proposed main signalized entrance, which would connect to an existing 12-inch sewer line in California Street. Each building would have its own sewer lateral that would connect to the existing sewer line.

2.2.6.3 Stormwater

In its existing condition, the project site is covered entirely by pervious surfaces. The existing topography of the project site gently slopes from northeast to southwest towards the existing drainage channel,

Mission Channel, along the southwest boundary of the project site, with approximately 0.5 to 2 percent slopes. Under existing conditions, stormwater at the project site either infiltrates at the project site or sheet flows southwest to discharge into Mission Channel.

The proposed project would increase the impervious surface coverage on the project site compared to existing conditions. However, the proposed project would generally maintain the existing drainage pattern at the project site, infiltrating stormwater at the project site and reducing the peak runoff from the project site prior to discharging Mission Channel. The proposed project would include an infiltration basin (Basin A) that would be appropriately sized to retain and infiltrate the required Design Capture Volume for the entire project site (10,795 cubic feet), while detaining and reducing the developed peak runoff such that the 100-year outflows would be less than the 25-year existing event, as required by the San Bernardino County Municipal Separate Storm Sewer System (MS4) Permit. Emergency overflow and the reduced peak runoff from the project site would be discharged into Mission Channel via a calibrated outlet structure at the northwest corner of the project site.

2.2.6.4 Electricity and Gas

Electrical service would be provided by Southern California Edison through connections to the existing overhead lines along California Street. Undergrounding of overhead utilities would be required as described in Section 17.17.020, Required Improvements, of the City's Municipal Code. The location and size of natural gas facilities would be coordinated with Southern California Gas Company (SoCalGas), who would provide natural gas to the project site through connections to natural gas infrastructure in California Street.

2.3 REQUIRED PERMITS AND APPROVALS

Although the City is the Lead Agency for the project under CEQA, other agencies also have discretionary authority related to the project and approvals or serve as a responsible and/or trustee agency in connection to the project as established in *State CEQA Guidelines* Section 15124(d)(2), "If a public agency must make more than one decision on a project, all its decisions subject to CEQA should be listed." A list of these agencies and potential permits and approvals that may be required is provided in **Table 2.E: Potential Permits and Approvals.**

Table 2.E: Potential Permits and Approvals

Lead Agency	Permits/Approvals
City of Redlands	• Approval of Conditional Use Permit (CUP) No. 1200 for the proposed hotel • Approval of CUP No. 1203 for the proposed drive through coffee shop • Approval of Tentative Parcel Map No. 20854 • Commission Review and Approvals No. 0973 to approve the site plan, site improvements, landscaping plans, and architectural elevations for each portion of the project • Socio-Economic Cost Benefit Study • Environmental Review
Other Agencies/Entities	
Redlands Fire Department	• Review/approve fire truck access and site fire flow design
City of Redlands Building Division	• Issuance of Building Permits for new construction
City of Redlands Municipal Utilities and Engineering Department	• Issuance of Final Parcel Map • Connection to water system • Connection to wastewater system
County of San Bernardino Flood Control District	• Connection of stormwater infrastructure to Mission Channel.
Southern California Edison and Southern California Gas Company	• Connection of electricity/natural gas service • Undergrounding of utilities

Source: Compiled by LSA Associates, Inc. (2024).

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3.0 INITIAL STUDY CHECKLIST

1. **Project Title:**
   913 California Street, The Commons at California Project

2. **Lead Agency Name and Address:**
   City of Redlands
   Development Services Department, Planning Division
   35 Cajon Street, Suite 20
   Post Office Box 3005
   Redlands, California 92373

3. **Contact Person and Phone Number:**
   Sean Reilly, Principal Planner
   City of Redlands
   (909) 798-7555 ext. 7344

4. **Project Location:**
   913 California Street
   Redlands, California, 92374

5. **Project Sponsor's Name and Address:**
   John Heimann
   Heimann Development Group LLC
   51 Modesto
   Irvine, California, 92602

6. **General Plan Designation:**
   According to the City's 2035 General Plan Livable Community Element, the project site is currently designated as Commercial.

7. **Zoning:**
   The City's Zoning Map designates the project site as General Commercial within the East Valley Corridor Specific Plan Area (EV/CG).

8. **Description of Property:**
   The 5.1-acre project site is at 913 California Street in Redlands, San Bernardino County, California. The project site is currently undeveloped, triangular in shape, and generally flat. Conditions on the site consist of disturbed vegetation, soils, and power utility poles. An existing gas station is adjacent to the northeast corner of the project site. Overhead utility lines border the eastern boundary of the site, and an existing storm drain is near the southeast corner. Mission Channel separates the project site from the adjacent residential community to the southwest. Unpaved maintenance/access roads exist on both sides of the channel. A railroad line borders the project site to the north, followed by a chain-link fence, rows of orchard trees, and Interstate 10 (I-10).

9. Surrounding Land Uses and Setting:
The project site is bounded by Mission Channel along the southwestern site boundary, California Street to the east, and a railroad line to the north. A mix of single- and multi-family residential uses within the City of Loma Linda are located southwest of the project site, across Mission Channel, and commercial uses are located east of California Street. Several rows of orchard trees followed by I-10 are north of the project site, across the railroad line. Commercial/industrial uses exist north of I-10.

10. Other Public Agencies whose Approval is Required:
Refer to **Table 2.E: Potential Permits and Approvals.**

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, has consultation begun?
Yes. Please refer to Checklist Section 3.18.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process (See Public Resources Code Section 21083.3.2.). Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code Section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of the 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: May 29, 2025

Name and Title: Sean Reilly, Principal Planner

EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

3. Once the lead agency has determined that a particular physical impact may occur, 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 Environmental Impact Report (EIR) is required.

4. "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 a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

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

    a. Earlier Analysis Used. Identify and state where they are available for review.

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

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

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

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

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

9. The explanation of each issue should identify:

    a. The significance criteria or threshold, if any, used to evaluate each question; and

    b. The mitigation measure identified, if any, to reduce the impact to less than significant.

3.1 AESTHETICS

Would the project:

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a.	Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b.	Substantially damage scenic resources, including, but not limited to trees, rock outcroppings and historic buildings within a state scenic highway?	☐	☐	☒	☐
c.	In non-urbanized areas, substantially degrade the existing visual character or quality of public views? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d.	Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☐	☐	☒	☐

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

Less Than Significant Impact

Discussion of Effects: Scenic resources and vistas in the city consist of the scenic corridors and views to and from open spaces, canyonlands, hillsides, groves, historic districts and resources, and the San Bernardino Mountains to the north. Specifically, the City's General Plan designates the Crafton Hills Open Space, Emerald Necklace areas, and Crafton Hill citrus groves bordering the city as scenic resources.[3]

The project site is currently undeveloped, and conditions on the site generally consist of disturbed vegetation, soils, and power utility poles. An existing gas station is adjacent to the northeast corner of the project site. Overhead utility lines border the eastern boundary of the site, and an existing storm drain is near the southeast corner. Mission Channel separates the project site from the adjacent residential community to the southwest. Unpaved maintenance/access roads exist on both sides of the channel. A railroad line borders the project site to the north, followed by a chain-link fence, rows of orchard trees, and Interstate 10 (I-10). Land uses in the surrounding area include commercial uses to the north and east, and residential uses to the southwest. The project site is relatively level with no existing topographical features.

[3] City of Redlands. 2017a. City of Redlands General Plan 2035. Website: https://www.cityofredlands.org/post/planning-division-general-plan (accessed November 2024).

The project site is located approximately 6 miles south of the San Bernardino Mountains and approximately 7 miles northwest of the Crafton Hills Open Space and citrus groves. The Emerald Necklace Trail and Scenic Route consists of a 45-mile scenic circuit around the city, the closest point to the project site being approximately 0.4 mile north.[4] Existing intervening development partially obscures views of the distant San Bernardino Mountains to the north and fully obstructs views of the Emerald Necklace Trail and Scenic Route. In addition, existing intervening development, including the commercial buildings located east of the project site fully obstructs any views of the Crafton Hills Open Space and associated citrus groves.

The proposed project would result in the construction of a four-story hotel, drive-through coffee shop, semi-automated car wash, and associated landscaping and parking areas. The proposed hotel would not exceed 50 feet in height, the coffee shop would not exceed 22 feet in height, and the car wash would not exceed 24 feet in height. The heights of all proposed structures would be consistent with the General Commercial (EV/CG) zoning designation, which has no height limit.[5] Although the construction of the proposed buildings would partially obscure the views of the San Bernardino Mountains from the project site itself and may impede views from the residential community to the southwest, partial views of the San Bernardino Mountains would still exist from nearby public access points, including California Street to the east of the project site.

As such, the proposed project would have a **less than significant impact** related to scenic vistas. No mitigation is required.

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

Less Than Significant Impact

Discussion of Effects: According to the California Department of Transportation (Caltrans), no officially designated State Scenic Highways exist in the city.[6] Two highways, State Route 330 (SR-330) north of the City of Highland, approximately 4.7 miles northeast of the project site, and State Route 38 (SR-38) approximately 2.5 miles east of the project site, are considered Eligible State Scenic Highways, presumably due to their views of the San Bernardino Mountains to the north and east. However, neither of these highways are designated as State scenic Highways.

Due to distance and existing intervening development, the project site is not visible from either SR-330 or SR-38. Given that the project site is not visible from the eligible section of SR-38 or SR-330 and the proposed project would not exceed any height limits applicable to the General Commercial zoning designation, the proposed project would not damage scenic resources within a State Scenic Highway. Therefore, impacts to scenic resources within a State Scenic Highway viewshed would be **less than significant**. No mitigation is required.

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4 City of Redlands. 2017. City of Redlands General Plan 2035. Website: https://www.cityofredlands.org/post/planning-division-general-plan (accessed November 2024).

5 City of Redlands. 2024b. East Valley Corridor Specific Plan. Website: https://www.cityofredlands.org/post/specific-plans-and-community-plans (accessed November 2024).

6 California Department of Transportation (Caltrans). 2019. California State Scenic Highway System Map. https://www.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa (accessed November 2024).

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?

Less Than Significant Impact

Discussion of Effects: The project site is located in an urbanized area, adjacent to commercial and residential uses, and I-10. As discussed above under Sections 3.1(a) and 3.1(b), public views from publicly accessible vantage points, including California Street, would not be substantially degraded as a result of the proposed project.

Construction of the proposed project would introduce the use of machinery such as excavators and bulldozers, and the presence of the construction equipment, as well as the construction activities, would temporarily alter the visual character of the project site. Construction staging areas, including earth stockpiling, storage of equipment and supplies, and related activities would contribute to a disturbed site, which could be perceived by some viewers as a potential visual impact. Since construction activities would be temporary, they would not create a significant permanent impact on the visual character or quality of the project site and its surroundings.

Upon completion of the proposed project, public views of the project site from California Street, Redlands Boulevard, and I-10 would include streetscape landscaping, a hotel, a coffee shop, and a carwash, which would be developed to a similar mass, color, and height as surrounding existing commercial uses. As such, public views of the project site would be similar to the views of surrounding existing development. In addition, the landscape frontage along California Street and the northern and southern boundaries of the project site would provide a visual buffer that would allow for an aesthetically pleasing transition to the development on the project site. The proposed project would result in a change in the visual character of the project site; however, such changes would not be out of line with the existing pattern of land uses surrounding the project site. For these reasons, implementation of the proposed project would not generate a substantial degradation of the existing visual character or quality of public views of the site and its surroundings.

The proposed project would be developed on a site that is currently designated for Commercial land uses pursuant to the City's General Plan and is zoned EV/CG. Implementation of the proposed project would include the construction of a hotel, coffee shop, and car wash. The EV/CG zoning designation permits car washes, while drive-through restaurants and hotels are permitted as conditional uses with the approval of a conditional use permit. Proposed fences, landscaping, and walls on the project site would be in compliance with Chapter 18.168 of the City's Municipal Code. Overall, the proposed project would be designed to be consistent with existing development in the vicinity of the project site. These design elements would be complementary of the surrounding visual character of the area and would be consistent with design guidelines in accordance with the City's General Plan. Therefore, impacts to the visual character or quality of the project site and its surroundings would be **less than significant.** No mitigation is required.

d. Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Less Than Significant Impact

Discussion of Effects: Currently, nighttime lighting is produced by surrounding commercial and residential development, street lighting, and vehicles on adjacent roadways, including I-10, which is an important transportation corridor through the city. The proposed project would increase vehicle trips to and from the project site that would incrementally increase ambient nighttime illumination in the area. The proposed project would also incorporate street and pedestrian lighting at the main signalized entrance, secondary entrance and exit, roadways and parking areas, and individual lighting on each of the three proposed buildings. However, all lighting associated with the proposed project would be shielded such that it would minimize light spillage onto adjacent properties, as required by Section EV4.0215 of the City's Community Design Guidelines.[7] Through compliance with existing City regulations, proposed lighting would not substantially affect daytime or nighttime views in the vicinity of the proposed project.

Glare can be produced during the daytime and is usually associated with reflective building materials, such as glass, stainless steel, aluminum, and photovoltaic panels. The proposed building exteriors would generally be covered by non-reflective materials, which would minimize glare, and glass windows would be incorporated into each building design in accordance with development standards established for the commercial land use and zoning designations. The project site perimeter would be developed with drought-tolerant street trees, decorative landscaping, architectural features, and other streetscape design techniques to minimize light spillage onto neighboring areas. Additionally, the proposed project would generally not utilize high gloss or reflective materials that would cause substantial glare or reflection or generate excessive light. Therefore, impacts from new sources of substantial light or glare would be **less than significant**. No mitigation is required.

[7] City of Redlands. 2022b. Division 4: Community Design Guidelines. Amended November 5, 2022. Website: https://www.cityofredlands.org/sites/main/files/file-attachments/ev-division4pg1-42.pdf?1582744503 (accessed January 2025).

3.2 AGRICULTURE AND FORESTRY RESOURCES

Would the project:	Potentially Significant Impact	Less than Significant 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?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for or cause rezoning of forest land (as defined in Public Resources Code section 12220(g), timberland (as defined by Public Resources Code Section 4526) or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

a. 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?

No Impact

Discussion of Effects: The project site is currently undeveloped and generally consists of disturbed vegetation, soils, and power utility poles. According to the California Department of Conservation Farmland Mapping and Monitoring Program, the project site and surrounding area is designated as Urban and Built-Up Land.[8] This designation is defined as land that is occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. Common examples include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water control structures. As such, the project site is not designated as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland. Therefore,

[8] California Department of Conservation. n.d.-b. California Important Farmland Finder. https://maps.conservation.ca.gov/DLRP/CIFF/ (accessed November 2024).

implementation of the proposed project would not convert Farmland to a non-agricultural use. **No impact** would occur.

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

No Impact

Discussion of Effects: The project site is currently zoned as EV/CG and is not zoned for agricultural use. According to the City's General Plan EIR, the project site is not under a Williamson Act Contract.[9] Therefore, implementation of the proposed project would not conflict with existing zoning for agricultural use, nor would it conflict with a Williamson Act Contract. **No impact** would occur.

c. Conflict with existing zoning for or cause rezoning of forest land (as defined in Public Resources Code section 12220(g), timberland (as defined by Public Resources Code Section 4526) or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No Impact

Discussion of Effects: As discussed above, the project site is currently zoned EV/CG, and is not zoned as forest land (as defined in Public Resources Code [PRC] Section 1222(g)), timberland (as defined by PRC Section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)). Therefore, implementation of the proposed project would not conflict with existing zoning for forestry resources. **No impact** would occur.

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

No Impact

Discussion of Effects: The project site is currently undeveloped and generally consists of disturbed vegetation, soils, and power utility poles. The project site is not occupied by forest land. Therefore, implementation of the proposed project would not result in the loss of forest land or the conversion of forest land to non-forest use. **No impact** would occur.

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

Discussion of Effects: The project site is not adjacent to farmland or forest land or zoned for agricultural or forestry use. Therefore, implementation of the proposed project would not involve other changes in the existing environment which, due to its location or nature, could result in conversion of Farmland to non-agricultural use or the conversion of forest land to non-forest use. **No impact** would occur.

[9] City of Redlands. 2017b. City of Redlands General Plan 2035 Environmental Impact Report. Website: https://www.cityofredlands.org/post/planning-division-general-plan (accessed November 2024).

3.3 AIR QUALITY

Would the project:

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

The information and analysis in this section have been prepared based on the Air Quality, Greenhouse Gas, and Energy Impact Study[10] (**Appendix A**) prepared by MD Acoustics, LLC and dated February 17, 2025.

The project site is within the South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) is the regional government agency that monitors and regulates air pollution within the Basin. The federal Clean Air Act and the California Clean Air Act mandate the control and reduction of specific air pollutants. Under these acts, the United States Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have established ambient air quality standards for specific "criteria" pollutants, designed to protect public health and welfare. Primary criteria pollutants include carbon monoxide (CO), volatile organic compounds (VOCs), nitrogen oxides (NO_X), particulate matter less than 10 microns in size (PM_{10}), sulfur dioxide (SO_2), and lead (Pb). Secondary criteria pollutants include ozone (O_3), and particulate matter less than 2.5 microns in size ($PM_{2.5}$). The ambient air quality standard for each criteria pollutant represents the level that is considered safe to the public and avoids specific adverse health effects associated with each criteria pollutant.

The Basin is in nonattainment for the federal and State standards for O_3 and $PM_{2.5}$, and nonattainment for the State PM_{10} standard. In addition, the Basin is in attainment/maintenance for the federal PM_{10}, CO, SO_2, and nitrogen dioxide (NO_2) standards. The SCAQMD has established project-level thresholds for VOCs, NO_X, CO, SO_2, PM_{10}, and $PM_{2.5}$ shown in **Table 3.3.A: SCAQMD Construction and Operation Thresholds of Significance**. The SCAQMD considers any project in the Basin with construction- or operation-related emissions that exceed any of the emission thresholds below to have potentially significant impacts.

[10] MD Acoustics, LLC. 2025a. 913 California Street Air Quality, Greenhouse Gas, and Energy Impact Study, City of Redlands, CA. February 17.

Table 3.3.A: SCAQMD Construction and Operation Thresholds of Significance

Emission Source	Pollutant Emissions Threshold (lbs/day)					
	VOCs	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Construction Thresholds	75	100	550	150	150	55
Operation Thresholds	55	55	550	150	150	55

Source: South Coast AQMD Air Quality Significance Thresholds (South Coast Air Quality Management District [SCAQMD], March, 2023). Website: https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25 (accessed March 2025).

CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_2 = sulfur dioxide
VOCs = volatile organic compounds

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

Less Than Significant Impact

Discussion of Effects: In order to reduce emissions, the SCAQMD adopted the 2022 Air Quality Management Plan (AQMP) which establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving State and federal air quality standards. The 2022 AQMP is a regional and multi-agency effort including the SCAQMD, CARB, the Southern California Association of Governments (SCAG), and the USEPA.

The 2022 AQMP pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans. Additionally, the 2022 AQMP utilized information and data from the SCAG and its 2020–2045 RTP/SCS. The SCAQMD considers projects that are consistent with the 2022 AQMP, which is intended to bring the Basin into attainment for all criteria pollutants, to also have less than significant cumulative impacts.

Criteria for determining consistency with the AQMP are defined by the following indicators:

Criterion 1: With respect to the first criterion, SCAQMD methodologies require that an air quality analysis for a project include forecasts of project emissions in relation to contributing to air quality violations and delay of attainment.

1. *Would the project result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP?*

   Since the consistency criteria identified under the first criterion pertain to pollutant concentrations, rather than to total regional emissions, an analysis of a project's pollutant emissions relative to localized pollutant concentrations is used as the basis for evaluating project consistency. As discussed under Section 3.3(b) and (c), below, the proposed project's short-term construction emissions, long-term operational emissions, and localized concentrations of CO, NO_X, PM_{10}, and $PM_{2.5}$ would result in less than significant impacts during project construction and

operations. Therefore, the proposed project would not contribute to the exceedance of any air pollutant concentration standard and is found to be consistent with the first criterion of the AQMP.

Criterion 2: With respect to the second criterion for determining consistency with SCAQMD and SCAG air quality policies, it is important to recognize that air quality planning within the Basin focuses on attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing, and growth trends. Thus, the SCAQMD's second criterion for determining project consistency focuses on whether or not a proposed project exceeds the assumptions utilized in preparing the forecasts presented in the 2022 AQMP.

1. *Would the project exceed the assumptions in the AQMP in 2022 based on the year of project buildout and phase?*

   The emphasis of this criterion is to ensure that the analyses conducted for the proposed project are based on the same forecasts as the AQMP. A project is consistent with the AQMP in part if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the AQMP, three sources of data form the basis for the projections of air pollutant emissions: the City's General Plan, SCAG's regional growth forecast, and the SCAG RTP/SCS.

   The project site is currently designated for Commercial uses. The Commercial land use designation is intended for a wide range of commercial uses, including neighborhood-serving stores and convenience centers, regional commercial centers, and commercial recreation. The project site is currently zoned EV/CG, within the East Valley Corridor Specific Plan area. The purpose of the East Valley Corridor Specific Plan is to provide for large undeveloped areas along I-10 to facilitate future industrial, commercial and residential development in an orderly and aesthetic manner, provide a strong job base to support the local economy, and to ensure high-quality development through design guidelines and standards. The intent of the EV/CG zoning district is to create, preserve and enhance areas for businesses which provide a variety of goods and services serving a community or regional market. Car washes are a permitted land use under this zoning designation, while development of hotels and drive-through restaurants would require approval of a Conditional Use Permit (CUP). As discussed in Section 3.11, Land Use and Planning, the proposed project would be consistent with the General Plan and zoning designations for the project site.

   As such, the proposed project would be consistent with the types, intensity, and patterns of land use envisioned for the project site and vicinity and would be considered consistent with the General Plan upon the City's approvals of the required permits. Further, the population and housing growth projections, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the City. As the SCAQMD has incorporated these same projections into the AQMP, it can be concluded that the proposed project would be consistent with the projections. Therefore, the proposed project would not exceed the AQMP assumptions for the project site and is found to be consistent with the AQMP for the second criterion.

In conclusion, the determination of 2022 AQMP consistency is primarily concerned with the long-term influence of a project on air quality in the Basin. The proposed project would not result in a long-term impact on the region's ability to meet State and federal air quality standards. Also, the proposed project

would be consistent with the goals and policies of the 2022 AQMP for control of fugitive dust (refer to Section 3.3(b)). As discussed above, the proposed project's long-term influence would also be consistent with the SCAQMD and SCAG's goals and policies and, therefore, it would be considered consistent with the 2022 AQMP. Impacts would be **less than significant**, and no mitigation is required.

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?

Less Than Significant Impact

Discussion of Effects: As identified above, the Basin is currently designated as nonattainment for the federal and State standards for O_3 and $PM_{2.5}$. The Basin's nonattainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, the SCAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified SCAQMD significance thresholds identified in **Table 3.3.A**, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Therefore, additional analysis to assess cumulative impacts is not necessary. The following analysis assesses the potential project-level air quality impacts associated with construction and operation of the proposed project.

Construction Emissions. During construction, short-term degradation of air quality may occur due to the release of particulate matter emissions (i.e., fugitive dust) generated by site preparation and grading activities. Emissions from construction equipment are also anticipated and would include CO, NO_X, VOCs, directly emitted $PM_{2.5}$ or PM_{10}, and toxic air contaminants such as diesel exhaust particulate matter.

Project construction activities would include site preparation, grading, building construction, architectural coating, and paving activities. Construction-related effects on air quality from the proposed project would be greatest during the site preparation phase due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at the construction site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM_{10} emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM_{10} emissions would depend on soil moisture, silt content of soil, wind speed, and amount of operating equipment. Larger dust particles would settle near the source, whereas fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. The SCAQMD has established Rule 403: Fugitive Dust, which would require the Applicant to implement measures that would reduce the amount of particulate matter generated during the construction period. The Rule 403 measures that were incorporated in this analysis include:

- Water active sites at least three times daily (locations where grading is to occur shall be thoroughly watered prior to earthmoving).

- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 2 feet (0.6 meter) of freeboard (vertical space between the top of the load and the top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.

- Reduce traffic speeds on all unpaved roads to 15 miles per hour or less.

In addition to dust-related PM_{10} emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, sulfur oxides (SO_X), NO_X, VOCs, and some soot particulate ($PM_{2.5}$ and PM_{10}) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

The proposed project would be constructed over 13 months, with construction anticipated to begin in late 2024[11]. Exhaust emission factors for typical diesel-powered heavy equipment are based on the California Emissions Estimator Model (CalEEMod) version 2022.1.1.22 program defaults. The construction equipment list was provided by the Applicant and used in the CalEEMod analysis. Variables factored into estimating the total construction emissions include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported on or off site. The analysis of daily construction emissions has been prepared using CalEEMod. Refer to **Appendix A** for the CalEEMod outputs and results. **Table 3.3.B: Short-Term Construction Emissions** presents the anticipated daily short-term construction emissions.

[11] Since the time this analysis was prepared, the construction year has changed to 2025. As the analysis year increases, emission factors decrease due to the natural turnover of older equipment being replaced by less polluting equipment and emission regulations becoming more stringent. Therefore, the construction schedule utilized in the analysis represents a more conservative analysis.

Table 3.3.B: Short-Term Construction Emissions

Activity	Pollutant Emissions (lbs/day)[1]					
	VOCs	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Site Preparation						
On-Site[2]	3.65	36.00	32.90	0.05	9.27	5.41
Off-Site[3]	0.09	0.10	1.12	0.00	0.23	0.05
Total	**3.74**	**36.10**	**34.02**	**0.05**	**9.50**	**5.46**
Grading						
On-Site[2]	1.90	18.20	18.80	0.03	3.62	2.11
Off-Site[3]	0.18	7.14	4.76	0.044	1.75	0.52
Total	**2.08**	**25.34**	**23.56**	**0.07**	**5.37**	**2.63**
Building Construction						
On-Site[2]	1.20	11.20	13.10	0.02	0.50	0.46
Off-Site[3]	0.14	0.56	1.95	0.00	0.46	0.11
Total	**1.34**	**11.76**	**15.05**	**0.02**	**0.96**	**0.57**
Paving						
On-Site[2]	0.90	6.52	8.84	0.01	0.29	0.26
Off-Site[3]	0.10	0.43	1.75	0.00	0.35	0.09
Total	**1.00**	**6.95**	**10.59**	**0.01**	**0.64**	**0.35**
Architectural Coating						
On-Site[2]	34.73	0.88	1.14	0.00	0.03	0.03
Off-Site[3]	0.02	0.03	0.32	0.00	0.07	0.02
Total	**34.75**	**0.91**	**1.46**	**0.00**	**0.10**	**0.05**
Total of Overlapping Phases[4]	37.09	19.62	27.10	0.03	1.70	0.97
SCAQMD Regional Threshold	75	100	550	150	150	55
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: 913 California Street Air Quality, Greenhouse Gas, and Energy Impact Study (MD Acoustics, LLC, February 17, 2025) **(Appendix A).**

[1] Emissions were calculated using CalEEMod, version 2022.1.1.22.

[2] On-site emissions from equipment operated on-site that is not operated on public roads.

[3] Off-site emissions from equipment operated on public roads.

[4] Depending on final construction schedules, building construction, architectural coatings and paving phases may overlap, and these data represent that worst-case scenario.

CalEEMod = California Emissions Estimator Model
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

As shown in **Table 3.3.B**, above, construction emissions associated with the proposed project would not exceed the SCAQMD's thresholds for VOCs, NO_X, CO, SO_X, $PM_{2.5}$, and PM_{10}. Construction activities would comply with SCAQMD Rule 402, which prohibits fugitive dust from creating a nuisance off site, and Rule 403, which requires that excessive fugitive dust emissions be controlled by regular watering or other dust prevention measures. Adherence to SCAQMD Rule 403 would greatly reduce PM_{10} and $PM_{2.5}$ concentrations. In addition, all architectural coatings for the proposed project's structures would be required to comply with SCAQMD Rule 1113. Rule 1113 provides specifications on painting practices as well as regulates the VOC content of paint. Therefore, construction of the proposed project would not result in a cumulatively considerable increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard. Impacts would be **less than significant,** and no mitigation is required.

Operational Emissions. Long-term air quality impacts would consist of mobile source emissions generated from project-related traffic, and emissions from stationary area and energy sources. Emissions associated with each of these sources were calculated and are discussed below.

Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, VOC, NO_X, SO_X, PM_{10}, and $PM_{2.5}$ are all pollutants of regional concern (NO_X and VOC react with sunlight to form O_3 [photochemical smog], and wind currents readily transport SO_X, PM_{10}, and $PM_{2.5}$); however, CO tends to be a localized pollutant, dispersing rapidly at the source.

Energy source emissions would be generated as a result of electricity and natural gas (non-hearth) usage associated with the proposed residential development. The primary use of electricity and natural gas by the proposed project would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. Criteria air pollutant emissions from electricity use were not quantified since criteria pollutants emissions occur at the site of the power plant, which is off site. Therefore, energy source emissions from electricity usage would be zero and the emissions would only be generated from consumption of the natural gas.

Typically, area source emissions consist of direct sources of air emissions located at the project site, including architectural coatings and the use of landscape maintenance equipment. Area source emissions associated with the proposed project would include emissions from the use of landscaping equipment, architectural coating, and consumer products.

Operational emissions generated by the proposed project were calculated with CalEEMod and are detailed in **Table 3.3.C: Project Operational Emissions,** below.

Table 3.3.C: Project Operational Emissions

Activity	Pollutant Emissions (lbs/day)[1]					
	VOC	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Area Sources[2]	2.04	0.02	2.84	0.00	0.01	0.00
Energy Usage[3]	0.03	0.57	0.48	0.00	0.04	0.04
Mobile Sources[4]	6.60	6.65	58.50	0.14	12.00	3.12
Total Emissions	**8.67**	**7.24**	**61.82**	**0.14**	**12.05**	**3.16**
SCAQMD Threshold	55.0	55.0	550.0	150.0	150.0	55.0
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: 913 California Street Air Quality, Greenhouse Gas, and Energy Impact Study (MD Acoustics, LLC, February 17, 2025) **(Appendix A).**

1 Emissions were calculated using CalEEMod, version 2022.1.1.22.

2 Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.

3 Energy usage consists of emissions from on-site natural gas usage.

4 Mobile sources consist of emissions from vehicles and road dust.

CalEEMod = California Emissions Estimator Model
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

As shown in **Table 3.3.C,** above, the proposed project would not exceed the significance criteria for daily VOCs, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$ emissions. Therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is

in nonattainment under an applicable federal or State ambient air quality standard. Impacts would be **less than significant**, and no mitigation is required.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact

Discussion of Effects: Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis. The nearest sensitive receptors to the project site include the single-family residences located approximately 165 feet to the southwest of the project site.

Local Significance Thresholds (LSTs) were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003 and revised 2008) for guidance. The LST methodology assists lead agencies in analyzing localized air quality impacts. The SCAQMD provides the LST screening lookup tables for projects that disturb/grade 1, 2, or 5 acres per day emitting CO, NO_X, $PM_{2.5}$, or PM_{10}. The LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling over the roadways. The SCAQMD recommends that air quality dispersion modeling be completed for any project over 5 acres in size to assess impacts to nearby sensitive receptors from area source emissions. For LST analysis purposes, the SCAQMD is divided into 38 Source Receptor Areas (SRAs), each of which contain specific localized air quality emission thresholds for CO, NO_X, $PM_{2.5}$, and PM_{10} to determine local air quality impacts. The proposed project would be located in SRA 35, East San Bernardino Valley.

The SCAQMD provides LST thresholds for 1-, 2-, and 5-acre site disturbance areas per day; it is noted that the SCAQMD does not provide LST thresholds for projects disturbing over 5 acres per day. The SCAQMD guidance on applying CalEEMod to LSTs specifies the number of acres a particular piece of equipment would likely disturb per day.[12] As the SCAQMD provides LST thresholds for 1-, 2-, and 5-acre disturbance areas, with lower thresholds for smaller disturbance areas, the emission thresholds were based on a disturbance of 2 acres per day to provide a conservative analysis. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. As the nearest sensitive receptor is located approximately 50 meters from the project site's boundary, the LST values for 50 meters were used.

Table 3.3.D: Localized Significance of Construction Emissions, shows the localized construction-related emissions. It is noted that the localized emissions presented in **Table 3.3.D: Localized Significance of Construction Emissions** are less than those in **Table 3.3.A** because localized emissions include only on-site emissions (i.e., from construction equipment and fugitive dust), and do not include off-site emissions (i.e., from worker, vendor, and hauling trips).

[12] The number of acres represents the total acres traversed by grading equipment. In order to properly grade a piece of land, multiple passes with equipment may be required. The disturbance acreage is based on the equipment list and days of the grading phase according to the anticipated maximum number of acres a given piece of equipment can pass over in an 8-hour workday.

Table 3.3.D: Localized Significance of Construction Emissions

Phase	On-Site Pollutant Emissions (lbs/day)[1]			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Site Preparation	36.00	32.90	9.27	5.41
Grading	18.20	18.80	3.62	2.11
Building Construction	11.20	13.10	0.50	0.46
Paving	6.52	8.84	0.29	0.26
Architectural Coating	0.88	1.14	0.03	0.03
Peak Daily Emissions[2]	**36.00**	**32.90**	**9.27**	**5.41**
Localized Significance Threshold[3]	200	1,1712	21	7
Exceeds Threshold?	**No**	**No**	**No**	**No**

Source: 913 California Street Air Quality, Greenhouse Gas, and Energy Impact Study (MD Acoustics, LLC, February 17, 2025) **(Appendix A).**

1 Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for two acres in East San Bernardino Valley Source Receptor Area (SRA 35). This is a conservative threshold as the project will disturb a maximum of 3.5 acres per day.

2 Considers overlapping phases.

3 The nearest sensitive receptor is located 50 meters southwest; therefore, the 50-meter threshold has been used.

CalEEMod = California Emissions Estimator Model
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
SCAQMD = South Coast Air Quality Management District

As shown in **Table 3.3.D**, emissions would not exceed the LSTs for SRA 35. Therefore, construction LST impacts would be **less than significant**.

In addition, according to SCAQMD localized significance threshold methodology, LSTs would apply to the operational phase of a proposed project if the project includes stationary sources or attracts mobile sources that may spend extended periods queuing and idling at the site (e.g., warehouse or transfer facilities). For operational emissions, the screening tables for a disturbance area of 5 acres per day, as the proposed project is approximately 5 acres, and a distance of 50 meters were used to determine significance. The tables were then compared to the proposed project's on-site operational emissions. **Table 3.3.E: Localized Significance of Operational Emissions**, shows the localized construction-related emissions.

Table 3.3.E: Localized Significance of Operational Emissions

Phase	On-Site Pollutant Emissions (lbs/day)[1]			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Area Sources[2]	0.02	2.84	0.01	0.00
Energy Usage[3]	0.57	0.48	0.04	0.04
On-Site Vehicle Emissions[4]	0.67	5.85	1.20	0.31
Total Emissions	**1.26**	**9.17**	**1.25**	**0.35**
Localized Significance Threshold[5]	302	2,890	11	3
Exceeds Threshold?	**No**	**No**	**No**	**No**

Source: 913 California Street Air Quality, Greenhouse Gas, and Energy Impact Study (MD Acoustics, LLC, February 17, 2025) **(Appendix A).**

1 Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for five acres in East San Bernardino Valley Source Receptor Area (SRA 35). The project site includes 5.093 acres.

2 Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.

3 Energy usage consists of emissions from generation of electricity and on-site natural gas usage.

4 On-site vehicular emissions based on 1/10 of the gross vehicular emissions and road dust.

5 The nearest sensitive receptor is located 50 meters southwest; therefore, the 50-meter threshold has been used.

CalEEMod = California Emissions Estimator Model
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
SCAQMD = South Coast Air Quality Management District

As shown in **Table 3.3.E**, operational emissions would not exceed the LSTs for SRA 35. Therefore, operational LST impacts would be **less than significant**.

Long Term Microscale (CO Hot Spot) Analysis. CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels (adversely affecting residents, school children, hospital patients, the elderly, etc.).

The SCAQMD requires a quantified assessment of CO hotspots when a project increases the volume-to-capacity ratio (also called the intersection capacity utilization) by 0.02 (2 percent) for any intersection with an existing level of service (LOS) of D or worse. Because traffic congestion is highest at intersections where vehicles queue and are subject to reduced speeds, these hot spots are typically produced at intersections.

The Basin is designated as an attainment/maintenance area for the federal CO standards and an attainment area for State standards. There has been a decline in CO emissions even though vehicle miles traveled on United States urban and rural roads have increased. Nationwide estimated anthropogenic CO emissions have decreased 68 percent between 1990 and 2014. In 2014, mobile sources accounted for 82 percent of the nation's total anthropogenic CO emissions.[13] CO emissions have continued to decline since this time. The Basin was re-designated as attainment in 2007 and is no longer addressed in the SCAQMD's AQMP. Three major control programs have contributed to the reduced per-vehicle CO emissions: exhaust standards, cleaner burning fuels, and motor vehicle inspection/maintenance programs.

To determine if the proposed project would cause emission levels in excess of applicable CO standards, a sensitivity analysis was conducted to determine the potential for CO "hot spots" at a number of intersections in the general project vicinity. Because of reduced speeds and vehicle queuing, "hot spots" potentially can occur at high traffic volume intersections with an LOS E or worse.

Micro-scale air quality emissions have traditionally been analyzed in environmental documents where the air basin was a non-attainment area for CO. However, the SCAQMD has demonstrated in the CO attainment redesignation request to United States Environmental Protection Agency (USEPA) that there are no "hot spots" anywhere in the Basin, even at intersections with much higher volumes, much worse congestion, and much higher background CO levels than anywhere in San Bernardino County. If the worst-case intersections in the air basin have no "hot spot" potential, any local impacts will be below thresholds.

The project-specific trip generation analysis showed that the proposed project is anticipated to generate 1,619 daily vehicle trips, and the maximum daily traffic volume, including project-related trips, at any intersection within the project vicinity would be 24,500 daily trips. The 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan) showed that an intersection which has a daily traffic volume of approximately 100,000 vehicles per day would not violate the CO standard. The volume of traffic at project buildout would be well below 100,000 vehicles and below the necessary volume to cause a violation of the CO standard. Therefore, CO "hot spot" modeling not required, and no significant long-term air quality impact is anticipated to local air quality with the on-going use of the proposed project. Therefore, impacts would be **less than significant**, and no mitigation is required.

[13] United States Environmental Protection Agency (USEPA). n.d. Carbon Monoxide Emissions. Website: https://cfpub.epa.gov/roe/indicator_pdf.cfm?i=10 (accessed March 2025).

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

Discussion of Effects: According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed project does not include any uses identified by the SCAQMD as being associated with odors.

Construction activities associated with the project may generate detectable odors from heavy-duty equipment exhaust and architectural coatings. However, construction-related odors would be short term in nature and cease upon project completion. In addition, the proposed project would be required to comply with the California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than 5 minutes. Potential sources that may emit odors during operation of the proposed project would include odor emissions from vehicles and trash storage areas. Due to the distance of the nearest receptors from the project site (50 meters) and through compliance with SCAQMD's Rule 402, which prohibits the discharge of air contaminants that may cause a nuisance off site, impacts related to odors would be **less than significant**. No mitigation is required.

3.4 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?	☐	☐	☒	☐
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c.	Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	☐	☐	☐	☒

The information and analysis in this section have been prepared based on the Biological Resource Letter Report (**Appendix B**)[14] prepared by Helix Environmental Planning and dated January 24, 2025.

[14] Helix Environmental Planning, Inc. 2024. Biological Resource Letter Report for 913 Redlands Mixed-use Development Project. April 23. Revised January 24, 2025.

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?

Less Than Significant Impact

Discussion of Effects: The project site is currently undeveloped, triangular in shape, and generally flat. Conditions on the site consist of disturbed vegetation, soils, and power utility poles, and Mission Channel separates the project site from the adjacent residential community to the southwest.

The Biological Resource Letter Report (**Appendix B**) included database review to identify special-status plant and animal species potentially occurring on or within the vicinity of the project site and a biological field survey/habitat assessment of the project site, which was conducted on March 13, 2024, to evaluate the condition of any potential habitat present within the project site. Previously recorded occurrences of special-status plant and animal species and their proximity to the project site were determined through a query of the California Natural Diversity Database, Calflora data, California Native Plant Society's Electronic Inventory of Rare and Endangered Vascular Plants of California, and the United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation. The database review identified 12 special-status plant species and 31 special-status animal species with potential to occur on the project site; however, all of these species were determined to have low potential to occur at the project site and within the surrounding area based on the geographic range, elevation range, and lack of suitable habitat. In addition, the project site is not within USFWS-designated critical habitat for any federally listed species. The nearest USFWS designated critical habitat to the project site is for the San Bernardino kangaroo rat (*Dipodomys merriami parvus*) and is located approximately 1.5 miles north of the project site. This critical habitat is separated from the project site by existing development as well as I-10.

No special-status animal or plant species were observed or otherwise detected during the field survey. During the biological field survey/habitat assessment of the project site, a total of 10 animal species and nine plant species were observed. Animal species observed on the project site included killdeer (*Charadrius vociferus*), American kestrel (*Falco sparverius*), common raven (*Corvus corax*), house finch (*Haemorhous mexicanus*), northern rough-winged swallow (*Stelgidopteryx serripennis*), European sparrow (*Passer domesticus*), European starling (*Sturnus vulgaris*), red imported fire ant (*Solenopsis invicta*), convergent lady beetle (*Hippodamia convergens*), and the stink beetle (*Coelocnemis magna*). Two of the observed plant species were native species and the remaining seven were non-native species, indicating a high degree of disturbance due to historical and current uses of the project site. Plant species identified on the project site include blue elderberry (*Sambucus mexicana*), common fiddleneck (*Amsinckia intermedia*), short-pod mustard (*Hirschfeldia incana*), London rocket (*Sisymbrium irio*), redstem filaree (*Erodium cicutarium*), cheeseweed (*Malva parviflora*), wild oat (*Avena fatua*), bromegrass (*Bromus diandrus*), and foxtail barley (*Hordeum mrinum*). No fish or amphibian species were observed during the field survey as no hydrogeomorphic features were observed on the project site that would provide suitable habitat. As such, the proposed project would have a less than significant impact on special-status animal species, as no special-status species or suitable habitat conditions were observed on the project site.

While no breeding or nesting birds or raptors were observed within the project site and surrounding vicinity, vegetation on the project site could provide nesting habitat for birds protected by the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code. Construction of the proposed project may occur during the bird breeding season (typically February 1 through August 31), which could result in

ground-disturbing construction activities directly affecting birds protected by the MBTA and their nests through the removal of habitat on the project site and indirectly through increased noise, vibration, and increased human activity. To avoid or minimize impacts to birds in compliance with the MBTA and California Fish and Game Code, **Regulatory Compliance Measure (RCM) BIO-1** would require appropriate pre-construction surveys and avoidance measures be implemented before and during construction to avoid any impacts on nesting birds and raptor species.

RCM BIO-1

Pre-construction Nesting Bird Survey. Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.3, 3511, and 3513 of the California Fish and Game Code prohibit the take, possession, or destruction of birds, their nests or eggs). In order to protect nesting and migratory bird species, a nesting bird clearance survey shall be conducted prior to any ground disturbance or vegetation removal activities that may disrupt the birds during the nesting season. Consequently, if avian nesting behaviors are disrupted, such as nest abandonment and/or loss of reproductive effort, it is considered "take" and is potentially punishable by fines and/or imprisonment.

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

With adherence to **RCM BIO-1** and the implementation of pre-construction nesting bird surveys, implementation of the proposed project would have a **less than significant** impact on special-status species. No mitigation is required.

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

No Impact

Discussion of Effects: No discernible drainage courses, inundated areas, or wetland features/obligate plant species that would be considered jurisdictional by the United States Army Corps of Engineers (USACE), the Regional Water Quality Control Board (RWQCB), or the California Department of Fish and Wildlife (CDFW) were observed within the project site. In addition, no special-status vegetation or other natural community were observed on the project site during the biological field survey/habitat assessment. Therefore, the proposed project would have **no impact** on riparian habitat or other sensitive natural communities.

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

No Impact

Discussion of Effects: As discussed under Section 3.4(b) above, no discernible drainage courses, inundated areas, or wetland features/obligate plant species that would be considered jurisdictional by the USACE, the RWQCB, or the CDFW were observed within the project site. Therefore, the proposed project would have **no impact** on federally protected wetlands.

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

Less Than Significant Impact

Discussion of Effects: Habitat fragmentation occurs when a single, contiguous habitat area is divided into two or more areas, or where an action isolates the two or more new areas from each other. Isolation of habitat occurs when wildlife cannot move freely from one portion of the habitat to another or to/from one habitat type to another. Habitat fragmentation may occur when a portion of one of more habitats is converted into another habitat, as when scrub habitats are converted into annual grassland habitat because of frequent burning. Wildlife movement includes seasonal migration along corridors, as well as daily movements for foraging. Examples of migration corridors may include areas of unobstructed movement for deer, riparian corridors providing cover for migrating birds, routes between breeding waters and upland habitat for amphibians, and between roosting and feeding areas for birds.

The project site is surrounded by developed land in all directions, with minimal opportunities for movement. The project site does not function or contribute to any local or regional wildlife corridors or linkages and is not connected to any regional core resource areas. The Santa Ana River Corridor is located approximately 1.5 miles north of the project site; however, this natural area is separated from the project site by existing roads and developments. Based on the surrounding area, any wildlife movement across the project site is most likely to be local movements rather than regional. In addition, the surrounding residential land uses and existing roadways have fragmented the connection between the project site and other undeveloped areas in the vicinity and region. The existing landscape of the project site and absence of native vegetation would also limit the movement of wildlife through the project site. In addition, wildlife movement across the project site is further reduced by the presence of surrounding high-traffic roadways (e.g., California Street, Redlands Boulevard, and I-10) and existing residential and commercial development. Elevated noise levels, vehicle traffic, lighting, and human presence associated with the

surrounding residential and commercial developments and roadways would also decrease the suitability of the project site to be used as a wildlife movement corridor.

Although no riparian or other natural vegetation communities occur on the project site, existing vegetation on the project site may provide nesting habitat for migratory birds. To avoid or minimize impacts to migratory birds in compliance with the MBTA and California Fish and Game Code, **RCM BIO-1**, as detailed above, would require appropriate pre-construction surveys and avoidance measures be implemented before and during construction to avoid any impacts on nesting birds and raptor species. With adherence to **RCM BIO-1** for the protection of birds pursuant to the MBTA, the proposed project would have a **less than significant** impact on the movement of native resident or migratory fish or wildlife species, native or migratory wildlife corridors, or native wildlife nursery sites. No mitigation is required.

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

No Impact

Discussion of Effects: The City's General Plan outlines policies that protect biological resources. These policies pertain to important ecological areas in the city, such as San Timoteo Canyon, Live Oak Canyon, the Crafton Hills, the Santa Ana River, Mill Creek, and other riparian areas within the city. The project site is not in the vicinity of any of the important ecological areas identified in the City's General Plan, and no riparian areas were observed on the project site.

Street trees and other trees in the public domain within the city are managed pursuant to Chapter 12.52 of the City's Municipal Code.[15] However, the City does not have any local policies or ordinances pertaining to trees on private property.

The proposed project would not conflict with any policies protecting biological resources in the city and would not require the removal of any trees. Therefore, development of the proposed project would not conflict with any local policies or ordinances protecting biological resources, and **no impact** would occur.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact

Discussion of Effects: The City has adopted the Upper Santa Ana River Wash Land Management and Habitat Conservation Plan, which permits and mitigates construction and maintenance activities within the Santa Ana River Wash, approximately 1.7 miles north of the project site, including water conservation, wells and water infrastructure, aggregate mining, transportation, flood control, agriculture, trails, and habitat enhancement. The project site is located outside the boundaries of the Upper Santa Ana River Wash Land Management and Habitat Conservation Plan. As such, **no impact** or conflict would occur in regard to conservation plans.

[15] City of Redlands. 2024c. Municipal Code. July. Website: https://codelibrary.amlegal.com/codes/redlandsca/latest/redlands_ca/0-0-0-1 (accessed March 2025).

3.5 CULTURAL RESOURCES

Would the project:

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

The information and analysis in this section have been prepared based on the Cultural Resources Assessment (**Appendix C**)[16] prepared by LSA Associates, Inc. and dated March 2025.

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

Less Than Significant Impact

Discussion of Effects: Pursuant to §15064.5, the term "historical resource" shall include:

(1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources [California Register] (Pub. Res. Code §5024.1, Title 14 California Code of Regulations [CCR], Section 4850 et seq.).

(2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

(3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code, § 5024.1, Title 14 CCR, Section 4852) including the following:

[16] LSA Associates, Inc. (LSA). 2025a. Cultural Resources Assessment 913 California Street Mixed-Use Project. March.

A. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

B. Is associated with the lives of persons important in our past.

C. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

D. Has yielded, or may be likely to yield, information important in prehistory or history.

A "substantial adverse change" to a historical resource, according to Public Resources Code (PRC) §5020.1(q), "means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired."

A project-specific cultural resources assessment was conducted for the project site and included an archaeological and historical resources record search by the South Central Coastal Information Center (SCCIC) at California State University, Fullerton, a Sacred Lands File (SLF) search, an intensive pedestrian survey of the project site, and additional research from a qualified LSA archaeologist including review of historic period aerial photographs, maps, and the Built Environment Resource Directory.

The results of the record search identified 26 previous cultural resource studies within 1 mile of the project site, none of which included any portion of the project site. Additionally, 37 previously identified cultural resources were recorded within 1 mile of the project site, including both prehistoric- and historic-period sites. The prehistoric sites include a cave shelter and a flake scatter; the historic sites include residential properties, foundations, historic refuse scatters, and water conveyance features. Additionally, six built environment resources have been evaluated as eligible for listing on historical registers, including three resources eligible for local listing and three resources eligible for national listing as historic properties. Review of historic period aerial photographs and maps indicates that there have been no buildings or structures present within the project site dating back to 1939 and the project site was used as an orchard until at least 1968. Between 1968 and 1980, the adjacent housing development to the southwest was constructed, and the project site was no longer used for agriculture.

A search of the SLF records was completed by the Native American Heritage Commission (NAHC). On February 24, 2025, the NAHC responded indicating the record search was positive, and provided the City with a list of Native American contacts in San Bernardino County to be contacted for consultation was provided. The records and results of tribal consultation are discussed in Section 3.18, Tribal Cultural Resources.

The intensive pedestrian survey of the project site did not identify any prehistoric or historic period resources within the project area. The project site has been subjected to surface disturbance from decades of citriculture and subsequent weed abatement discing, which was evident during the pedestrian survey. Although 37 cultural resources have been recorded within 1 mile of the project site, and six of the historic resources have been evaluated as being eligible for local or national listing, none predate the agricultural use at the project site, and the disturbed nature of sediments within the project site suggests low potential for in situ subsurface cultural resources.

Although no prehistoric or historic period resources were identified on the project site, ground-disturbing activities associated with construction of the proposed project has the potential to unearth previously

undocumented cultural resources. In the event that previously undocumented cultural resources are encountered during construction activities, the proposed project would be required to comply with CCR Title 14, Chapter 3, Section 15064.5(f), as detailed in **RCM CUL-1**. **RCM CUL-1** requires all construction work to be halted if archaeological materials are encountered during construction and a qualified archaeologist be consulted to determine appropriate treatment of the discovery.

RCM CUL-1 **Unanticipated Archaeological Deposits.** In the event that any historical or unique archaeological resources are encountered on the project site during any construction activities associated with the project, all ground disturbing activities within 50 feet of the resource shall be halted, and a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archaeology shall be consulted for an immediate evaluation of the resource. If the find is determined to be a historical or unique archaeological resource, the qualified archaeologist shall determine the appropriate treatment of the discovery, including the implementation of the appropriate mitigation measures. Mitigation measures may include recording the archaeological deposit, data recovery and analysis, and public outreach regarding the scientific and cultural importance of the discovery. Upon completion of the selected mitigations, a report documenting methods, findings, and recommendations shall be prepared by the qualified archaeologist, and the final report shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton. Significant archaeological materials shall be submitted to an appropriate local curation facility and used for future research and public interpretive displays, as appropriate. Work can continue on other parts of the project site while historical or unique archaeological resource mitigation takes place.

Compliance with **RCM CUL-1** would ensure impacts to known, unknown, or potential cultural resources that may be located within the project site would be **less than significant**. No mitigation is required.

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

Less Than Significant Impact

Discussion of Effects: Please refer to Section 3.5(a), above. Implementation of **RCM CUL-1** would ensure that impacts to known, unknown, or potential archaeological resources that may be located within the project site would be **less than significant**. No mitigation is required.

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

Less Than Significant Impact

Discussion of Effects: No known human remains are present on the project site, and there is no evidence to support the idea that Native Americans or people of European descent are buried on the project site; however, buried and undiscovered archaeological resources, including human remains, may be present below the ground surface in portions of the project site. Disturbing human remains could violate the State Health and Safety Code, as well as destroy the resource. In the unlikely event that human remains are

encountered during project grading, the Construction Contractor would be required to notify the proper authorities and adhere to standard procedures that would ensure the respectful handling of human remains during the earthmoving activities.

Construction contractors are required to adhere to CCR Section 15064.5(e), PRC Section 5097, and Section 7050.5 of the State's Health and Safety Code. To ensure proper treatment of burials in the event of an unanticipated discovery of a burial, human bone, or suspected human bone, the law requires that all excavation or grading in the vicinity of the find halt immediately, the area of the find be protected, and the contractor immediately notify the County Coroner of the find. The Construction Contractor, the Applicant, and the County Coroner are required to comply with the provisions of CCR Section 15064.5(e), PRC Section 5097.98, and Section 7050.5 of the State Health and Safety Code, as specified in **RCM CUL-2**.

RCM CUL-2 **Human Remains.** In the event that human remains or funerary objects are encountered on the project site during any construction activities associated with the proposed project, work within 100 feet of the discovery shall be redirected and the County Coroner notified immediately consistent with the requirements of California Code of Regulations (CCR) Section 15064.5(e). State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98. If the remains are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), which shall determine and notify a Most Likely Descendant (MLD).

With the permission of the property owner, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Consistent with CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the Applicant shall consult with the MLD as identified by the NAHC to develop an agreement for treatment and disposition of the remains. Prior to the issuance of grading permits, the Director of the City of Redlands Department of Development Services, or designee, shall verify that all grading plans specify the requirements of CCR Section 15064.5(e), State Health and Safety Code Section 7050.5, and PRC Section 5097.98, as stated above.

Compliance with **RCM CUL-2** would ensure that any potential impacts to unknown buried human remains would be **less than significant**. No mitigation is required.

3.6 ENERGY

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

The information and analysis in this section have been prepared based on the Air Quality, Greenhouse Gas, and Energy Impact Study[17] (**Appendix A**) prepared by MD Acoustics, LLC and dated February 17, 2025.

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

Less Than Significant Impact

Discussion of Effect: This analysis focuses on three sources of energy that are relevant to the proposed project: electricity, natural gas, and transportation fuel for vehicle trips and off-road construction equipment associated with project construction and operations. The analysis of operational electricity is based on the California Emissions Estimator Model (CalEEMod) version 2022.1.1.22 modeling results for the proposed project. The proposed project's estimated electricity consumption is based primarily on CalEEMod's default settings for San Bernardino County, and consumption factors provided by Southern California Edison (SCE) and the Southern California Gas Company (SoCalGas), who are the electricity and natural gas providers for the City and the project site. The results of the CalEEMod and energy consumption modeling are included in **Appendix A**. The amount of operational fuel consumption was estimated using the California Air Resources Board (CARB) Emissions Factor 2021 (EMFAC2021) computer program which provides projections for typical daily fuel (i.e., diesel and gasoline) usage in San Bernardino County, and the proposed project's annual vehicle miles traveled (VMT) outputs from CalEEMod. The estimated construction fuel consumption is based on the proposed project's construction equipment list timing/phasing, hours of duration for construction equipment, as well as vendor, hauling, and construction worker trips.

Construction. Construction of the proposed project would consume fuel from construction equipment, worker trips, and construction vendor/hauling trips. Fossil fuels used for construction vehicles and other energy-consuming equipment would be used during grading, paving, building construction, and architectural coatings. Fuel energy consumed during construction would be temporary and would not represent a significant demand on energy resources. In addition, some incidental energy conservation

[17] MD Acoustics, LLC. 2025a. 913 California Street Air Quality, Greenhouse Gas, and Energy Impact Study, City of Redlands, CA. February 17.

would occur during construction through compliance with State requirements that heavy-duty diesel equipment not in use for more than five minutes be turned off. Project construction equipment would also be required to comply with the latest United States Environmental Protection Agency (USEPA) and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Due to increasing transportation costs and fuel prices, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction. **Table 3.6.A: Construction Equipment Fuel Consumption Estimates**, below, summarizes fuel consumption estimates for the proposed project by construction phase and equipment, based on CARB's 2017 Emissions Factors Tables.

Table 3.6.A: Construction Equipment Fuel Consumption Estimates

Phase	Number of Days	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor	HP hrs/day	Total Fuel Consumption (gas diesel fuel)[1]
Site Preparation	5	Rubber Tired Dozers	3	8	367	0.4	3,523	952
	5	Tractors/Loaders/Backhoes	4	8	84	0.37	995	269
Grading	8	Excavators	1	8	36	0.38	109	47
	8	Graders	1	8	148	0.41	485	210
	8	Rubber Tired Dozers	1	8	367	0.4	1,174	508
	8	Tractors/Loaders/Backhoes	3	8	84	0.37	746	323
Building Construction	230	Cranes	1	7	367	0.4	1,028	12,776
	230	Forklifts	3	8	82	0.2	394	4,893
	230	Generator Sets	1	8	14	0.74	83	1,030
	230	Tractors/Loaders/Backhoes	3	8	84	0.37	746	9,274
	230	Welders	1	8	46	0.45	166	2,059
Paving	18	Cement and Mortar Mixers	2	6	10	0.56	67	65
	18	Pavers	1	8	81	0.42	272	265
	18	Paving Equipment	2	6	89	0.36	384	374
	18	Rollers	2	6	36	0.38	164	160
	18	Tractors/Loaders/Backhoes	1	8	84	0.37	249	242
Architectural Coating	18	Air Compressors	1	6	37	0.48	107	104
CONSTRUCTION FUEL DEMAND (gallons of diesel fuel)								33,550

Source: 913 California Street Air Quality, Greenhouse Gas, and Energy Impact Study (MD Acoustics, LLC, February 17, 2025) **(Appendix A).**

[1] Using Carl Moyer Guidelines Table D-21 Fuel consumption rate factors (bhp-hr/gal) for engines less than 750 hp. (Source: https://www.arb.ca.gov/msprog/moyer/guidelines/2017gl/2017_gl_appendix_d.pdf).

As shown above in **Table 3.6.A,** construction equipment fuel consumption associated with the proposed project would consume approximately 33,550 gallons of diesel fuel.

In addition to fuel consumption by construction equipment, the proposed project would generate fuel consumption through construction worker trips. The analysis assumes that all construction worker trips are from light duty vehicles along roadways in the vicinity of the project site. According to CalEEMod, the construction worker trips would generate an estimated 128,043 VMT. Vehicle fuel efficiencies for construction workers were estimated using information generated using CARB's EMFAC2021 model. **Table 3.6.B: Construction Worker Fuel Consumption Estimates**, depicts the breakdown of construction worker fuel consumption during each phase of construction. As shown in Table 3.6.B, the proposed project would use at total of approximately 4,216 gallons of fuel related to construction worker trips.

Table 3.6.B: Construction Worker Fuel Consumption Estimates

Phase	Number of Days	Worker Trips/Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Site Preparation	5	17.5	18.5	1,619	30.37	53
Grading	8	15	18.5	2,220	30.37	73
Building Construction	230	27.2	18.5	115,736	30.37	3,810
Paving	18	20	18.5	6,660	30.37	219
Architectural Coating	18	5.43	18.5	1,808	30.37	60
Total Construction Worker Fuel Consumption						**4,216**

Source: 913 California Street Air Quality, Greenhouse Gas, and Energy Impact Study (MD Acoustics, LLC, February 17, 2025) **(Appendix A)**.
Assumptions for the worker trip length and vehicle miles traveled are consistent with CalEEMod 2022.1.1.22 defaults.
CalEEMod = California Emissions Estimator Model
mpg = miles per gallon

In addition, fuel consumption for vendor and hauling during construction and architectural coating is estimated to generate an estimated 39,434 VMT, and to consume approximately 5,274 gallons of fuel, as shown below in **Table 3.6.C: Construction Vendor Fuel Consumption Estimates (Medium Heavy-Duty [MHD] Trucks)** and **Table 3.6.D: Construction Hauling Fuel Consumption Estimates (Heavy Heavy-Duty [HHD] Trucks)**.

Table 3.6.C: Construction Vendor Fuel Consumption Estimates (MHD Trucks)

Phase	Number of Days	Vendor Trips/Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Site Preparation	5	0	10.2	0	8.38	0
Grading	8	0	10.2	0	8.38	0
Building Construction	230	10.7	10.2	25,102	8.38	2,997
Paving	18	10	10.2	1,836	8.38	219
Architectural Coating	18	0	10.2	0	8.38	0
Total Vendor Fuel Consumption						**3,216**

Source: 913 California Street Air Quality, Greenhouse Gas, and Energy Impact Study (MD Acoustics, LLC, February 17, 2025) **(Appendix A)**.
mpg = miles per gallon

Table 3.6.D: Construction Hauling Fuel Consumption Estimates (HHD Trucks)

Phase	Number of Days	Hauling Trips/Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Site Preparation	5	0	20	0	6.07	0
Grading	8	78.1	20	12,496	6.07	2,058
Building Construction	230	0	20	0	6.07	0
Paving	18	0	20	0	6.07	0
Architectural Coating	18	0	20	0	6.07	0
Total Construction Hauling Fuel Consumption						**2,058**

Source: 913 California Street Air Quality, Greenhouse Gas, and Energy Impact Study (MD Acoustics, LLC, February 17, 2025) **(Appendix A)**.
mpg = miles per gallon

While construction equipment, worker trips, and construction hauling and vendor trips would consume fuel, all construction equipment used during construction of the proposed project would conform to CARB regulations and California emissions standards. In addition, the idling times of construction vehicles would be limited to no more than five minutes, thereby minimizing unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. As such, construction would not have a significant effect on the local and regional energy supplies. It is noted that construction fuel use is temporary and would cease upon completion of construction activities. There are no unusual project characteristics that would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in the region or State. Therefore, construction fuel consumption would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature. As such, this impact would be **less than significant.**

Operation. Operational energy demand associated with the proposed project would include transportation energy demands (energy consumed by employee and patron vehicles accessing the project site) and facilities energy demands (energy consumed by building operations and site maintenance activities).

The largest source of energy consumption associated with operation of the proposed project would be vehicle operation of customers. Using the CalEEMod results for the proposed project, an average trip for all vehicles was assumed to be 10.379 miles. To show a worst-case analysis, it was assumed that vehicles would operate 365 days per year. **Table 3.6.E: Estimated Vehicle Operations Fuel Consumption** shows the worst-case estimated annual fuel consumption for all classes of vehicles from autos to heavy-heavy trucks.

Table 3.6.E: Estimated Vehicle Operations Fuel Consumption

Vehicle Type	Vehicle Mix	Number of Vehicles	Average Trip (miles)	Daily VMT	Average Fuel Economy (mpg)	Total Gallons per Day	Total Annual Fuel Consumption (gallons)
Light Auto	Automobile	903.8	10.379	9,380	30.37	308.83	112,724
Light Truck	Automobile	93.7	10.379	973	25.00	38.91	14,204
Light Truck	Automobile	288.7	10.379	2,996	24.89	120.41	43,950
Medium Truck	Automobile	228.2	10.379	2,369	20.18	117.38	42,844
Light Heavy Truck	2-Axle Truck	44.0	10.379	456	16.06	28.42	10,371
Light Heavy Truck 10,000 lbs +	2-Axle Truck	11.9	10.379	123	15.14	8.14	2,973
Medium Heavy Truck	3-Axle Truck	19.5	10.379	203	8.38	24.20	8,832
Heavy Heavy Truck	4-Axle Truck	29.2	10.379	303	6.07	49.86	18,197
Total		1,619	-	16,803	-	696.15	-
Total Annual Fuel Consumption							**254,096**

Source: 913 California Street Air Quality, Greenhouse Gas, and Energy Impact Study (MD Acoustics, LLC, February 17, 2025) **(Appendix A)**.
lbs = pound(s)
mpg = miles per gallon
VMT = vehicle miles traveled

As shown above in **Table 3.6.E**, an estimated 254,096 gallons of fuel would be consumed per year for operation of the proposed project. Trip generation generated by the proposed project is consistent with

other similar commercial uses of similar scale and configuration as reflected in the trip generation analysis. The key drivers of transportation-related fuel consumption are job locations/commuting distance and many personal choices on when and where to drive for various purposes. Those factors are outside of the scope of the design of the proposed project. However, the proposed project would provide electric vehicle charging stations and bicycle parking in compliance with the California Green Building Standards Code (CALGreen Code). As discussed in Chapter 2.0, Project Description, of the 155 parking spaces provided by the proposed project, one would an accessible electric vehicle (EV) space and 25 would be EV/EV-capable spaces. Inclusion of electrical vehicle charging stations would encourage and support the use of electric vehicles, and the availability of other alternative transportation methods would reduce the petroleum fuel consumption associated with operation of the proposed project. Therefore, fuel consumption associated with project-related vehicle trips would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

Energy demand resulting from operation of the proposed project would also include natural gas and electricity demand. **Table 3.6.F: Project Unmitigated Annual Operational Energy Demand Summary** shows the natural gas and electricity demands estimated by CalEEMod.

Table 3.6.F: Project Unmitigated Annual Operational Energy Demand Summary

Natural Gas Demand	kBTU/year
Automobile Care Center	128,444
Hotel	1,820,905
Fast Food Restaurant with Drive Through	165,693
Total	2,115,042
Electricity Demand	**kWh/year**
Automobile Care Center	28,565
Hotel	972,767
Fast Food Restaurant with Drive Through	50,847
Parking Lot	49,988
Total	1,102,167

Source: 913 California Street Air Quality, Greenhouse Gas, and Energy Impact Study (MD Acoustics, LLC, February 17, 2025) **(Appendix A)**.
kBTU = thousand British thermal units
kWh = kilowatt hours

As shown in **Table 3.6.F**, operation of the proposed project would consume approximately 2,115,042 thousand British thermal units (kBTU) of natural gas per year, and approximately 1,102,167 kilowatt hours (kWh) of electricity per year. According to the California Energy Commission, non-residential energy consumption in San Bernardino County in 2022 totaled approximately 295 million therms, or 29.5 billion kBTU of natural gas, and 10,328 million kWh of electricity.[18] Therefore, the proposed project's natural gas use would constitute an approximate 0.07 percent increase over San Bernardino County's typical natural gas consumption. Similarly, the proposed project's electricity consumption would increase San Bernardino County's typical annual electricity consumption by approximately 0.01 percent. As a result, the proposed project would not result in unique or more intensive peak or base period electricity demand.

[18] California Energy Commission. 2022. Electricity and Gas Consumption by County. Website: http://www.ecdms.energy.ca.gov/ (accessed February 21, 2025).

The proposed project would also be required to comply with the most current Title 24 Building Energy Efficiency Standards, which provide minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Implementation of the Title 24 standards significantly reduces energy usage. The Title 24 Building Energy Efficiency Standards are updated every 3 years and become more stringent between each update. The proposed project would also incorporate sustainable building design features in accordance with Title 24 and CALGreen Code standards, such as installing energy efficient appliances.

Furthermore, the electricity provider, SCE, is subject to California's Renewables Portfolio Standard (RPS). The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020 and to 60 percent of total procurement by 2030. Renewable energy is generally defined as energy that comes from resources which are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat. The increase in reliance of such energy resources further ensures that new development projects will not result in the waste of the finite energy resources. Therefore, the proposed project would not cause wasteful, inefficient, and unnecessary consumption of building energy during project operation, or preempt future energy development or future energy conservation. The impact would be **less than significant**, and no mitigation is required.

For the reasons provided above, implementation of the proposed project would not result in the wasteful, inefficient, and unnecessary consumption of building energy during construction of operation. Impacts would be **less than significant**, and no mitigation is required.

b. Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Less Than Significant Impact

Discussion of Effect: The City does not have an adopted renewable energy or energy efficiency plan. State and regional plans for renewable energy and energy efficiency include the California Energy Commission's Integrated Energy Policy Report (IEPR), California Public Utilities Commission's (CPUC) Energy Efficiency Strategic Plan (CPUC Strategic Plan), Title 24 standards, and CALGreen standards. The proposed project would be required to comply with Title 24 and CALGreen standards and incorporates all applicable energy efficiency measures. Energy efficiency measures could include installation of energy efficient windows, insulation, lighting, ventilation systems, and water efficient fixtures, conservation of roof areas for future installation of solar panels, as well as provision of electric vehicles charging infrastructure, among others. Compliance with Title 24 and CALGreen standards would also be consistent with the CPUC Strategic Plan strategies and the IEPR building energy efficiency recommendations, which would ensure the proposed project's conformance with the State's energy reduction goals. It should be noted that the proposed project is consistent with the City's Climate Action Plan (CAP), which includes City-specific policies related to energy. As such, the proposed project would result in a **less than significant** impact associated with conflict or obstruction of a renewable energy or energy efficiency plans. No mitigation is required.

3.7 GEOLOGY AND SOILS

Would the project:

	Potentially Significant Impact	Less than Significant 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.	☐	☐	☐	☒
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

The following geology and soils analysis is based, in part, on the Geotechnical Investigation[19] (**Appendix D-1**) prepared by Applied Earth Sciences and dated November 30, 2023, which was updated to reflect project changes in a letter report dated April 18, 2025[20] (**Appendix D-2**).

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

No Impact

Discussion of Effects: The project site is located within a seismically active region; however, it is not located within the boundaries of an identified Earthquake Fault Zone for fault rupture hazard as defined by the Alquist-Priolo Earthquake Fault Zoning Act of 1972.[21] According to the Geotechnical Investigation, the nearest active fault to the project site is the San Bernardino South Fault, located approximately 3.1 miles west.[22] Due to the distance between the project site and the nearest active fault, the potential for ground rupture at the project site is considered low. In the absence of any on-site active faults, **no impact** related to fault rupture would occur.

ii. Strong seismic shaking?

Less Than Significant Impact

Discussion of Effects: The project site is located within a seismically active area, where earthquakes have the potential to produce very strong seismically related ground shaking during the anticipated operational life of the proposed project. As provided above, the nearest known active fault is the San Bernardino South Fault, located approximately 3.1 miles to the west of the project site.

The extent of ground shaking associated with an earthquake is dependent upon the size of the earthquake and the geologic material of the underlying area. All future construction and development on the project site would comply with applicable provisions of the California Building Code (CBC) and the City's building regulations in effect at the time when building permit applications are submitted. In addition, as provided in **Regulatory Compliance Measure (RCM) GEO-1,** the proposed project would be required to implement the project-specific design and construction recommendations detailed in the Geotechnical Investigation.

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19 Applied Earth Sciences, Geotechnical & Environmental Engineering Consultants. 2025. Report of Geotechnical Investigation and Percolation testing for SUSMP, Proposed Commercial Development Project, APN: 0292034170000, 913 California Street, Redlands, California 92374. April 18.

20 Applied Earth Sciences, Geotechnical & Environmental Engineering Consultants. 2025. Geotechnical Investigation Report Update, Proposed Commercial Development Project, APN: 0292034170000, 913 California Street, Redlands, California 92374. April 18.

21 California Department of Conservation. 2019. CGS Seismic Hazards Map. Website: https://maps-cnra-cadoc.opendata.arcgis.com/datasets/cadoc::cgs-seismic-hazards-program-alquist-priolo-fault-hazard-zones/explore?location=34.063088%2C-117.244306%2C11.59 (accessed December 2024).

22 Applied Earth Sciences, Geotechnical & Environmental Engineering Consultants. 2023. Report of Geotechnical Investigation and Percolation testing for SUSMP, proposed Commercial Development Project, APN: 0292034170000, 913 California Street, Redlands, California 92374. November 30.

Proper engineering design and construction in conformance with the CBC standards and Geotechnical Investigation would address potential impacts related to seismic ground shaking.

RCM GEO-1 **California Building Code and Geotechnical Recommendations.** Prior to the approval of any grading and/or building permits, the Applicant shall provide evidence to the City of Redlands for review and approval that on-site structures, features, and facilities have been designed and will be constructed in conformance with applicable provisions of the California Building Code in effect at the time of City review and the recommendations cited in the project-specific Geotechnical Investigation. This measure shall be implemented to the satisfaction of the Director of the City of Redlands Department of Development Services, Building and Safety Division, or designee.

Compliance with the current CBC and adherence to the recommendations identified in the Geotechnical Investigation would ensure ground shaking hazards would be **less than significant.** No mitigation is required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact

Discussion of Effects: Liquefaction is a phenomenon that occurs when strong seismic ground shaking causes soils to collapse from a sudden loss of cohesion and undergo a transformation from a solid to a liquefied state. There are three basic factors that must exist concurrently in order for liquefaction to occur:

- A source of ground shaking, such as an earthquake, capable of generating soil mass distortions;
- A relatively loose silty and/or sandy soil; and
- A relatively shallow groundwater table (within approximately 50 feet below ground surface) or completely saturated soil conditions that would allow positive pore pressure generation.

According to the Geotechnical Investigation, no groundwater was encountered in borings up to 51.5 feet below ground surface (bgs). However, the Geotechnical Investigation notes that there is no historic groundwater data available for this site and its vicinity. Therefore, liquefaction potential at the project site was evaluated under the assumption of groundwater being present at a depth of 4 feet bgs with infiltration of stormwater into the subsurface soils. The result of the liquefaction analysis concluded that no liquefaction would occur at the project site.

Secondary effects of seismic activity which may occur at the project site include ground subsidence and lateral spreading. The probability of occurrence of each type of seismically induced ground failure is dependent on the severity of the earthquake, distance from the fault, topography of the site, subsoil, and groundwater conditions at the site. According to the Geotechnical Investigation, grading and construction on the project site is anticipated to be safe against the hazards of landsliding, settlement, or slippage and would not have an adverse effect on geologic stability with implementation of the project-specific recommendations identified in the Geotechnical Investigation. With compliance with **RCM GEO-1**, potential impacts from seismically induced ground failure would be **less than significant,** and no mitigation is required.

iv. Landslides?

No Impact

Discussion of Effects: According to the Department of Conservation California Geological Survey Map of Earthquake Zones, the project site is not located within an area susceptible to landslides.[23] Due to the project site's flat topography, the absence of significant nearby slopes or hills in the area planned for development, and the planned site grading in accordance with **RCM GEO-1**, **no impact** from landslides or slope instabilities at the project site would occur.

b. Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact

Construction. Construction at the project site would disturb surface soils and make them susceptible to erosion from wind and water. Additionally, during a storm event, soil erosion and siltation could occur at an accelerated rate. As discussed in Section 3.10, Hydrology and Water Quality, and as specified in **RCM HYD-1**, the Applicant would be required to obtain coverage under the Nation Pollution Discharge Elimination System (NPDES) Program's Construction General Permit, which requires preparation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would detail Erosion Control and Sediment Control Best Management Practices (BMPs) to be implemented during construction to minimize erosion and retain sediment on site. The proposed project would also be required to comply with the grading permit requirements of chapter 70 of the uniform building code as noted in Section 18.212.030 of the City's Municipal Code, including measures to protect exposed soils such as limiting work to dry seasons, covering stockpiled soils, and use of straw bales and silt fences to minimize off-site sedimentation. In addition, the April 2025 letter report that updated the Geotechnical Investigation determined that no channel erosion or undermining from the adjacent Mission Channel would occur during construction based on the distance of the proposed structures from the channel.

With compliance with the requirements of the Construction General Permit and the Section 18.212.030 of the City's Municipal Code, including implementation of construction BMPs, construction impacts related to substantial soil erosion or the loss of topsoil would be **less than significant**, and no mitigation is required.

Operation. Implementation of the proposed project would increase the amount of impervious surface area on the project site due to the construction of a new hotel, drive-through coffee shop, semi-automated car wash, and associated parking improvements. An increase in impervious surface area increases the rate and volume of runoff during a storm, which can more effectively transport sediments to receiving waters. However, the impervious surface areas on the project site would not be prone to erosion because there would be no exposed soil. The remaining pervious surfaces on the project site would be landscaped with vegetation that would stabilize the soil and promote infiltration, thereby minimizing on-site erosion and siltation. Furthermore, as discussed in Section 3.10, Hydrology and Water Quality, the proposed project would be required to adhere to **RCM HYD-2**, which requires the preparation of a Final Water Quality Management Plan (WQMP) in compliance with the San Bernardino County Municipal Separate Storm Sewer System (MS4) permit and the implementation of Site Design,

[23] California Department of Conservation. n.d.-a. California Geological Survey. Earthquake Zones of Required Investigation. CGS Landslide Zones. https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/ (accessed December 2024).

Source Control, and Low Impact Development (LID) BMPs that minimize stormwater runoff thereby minimizing on-site erosion and siltation. With adherence to **RCM HYD-2**, operational impacts related to on-site or off-site erosion or siltation would be **less than significant**.

Overall, with adherence to **RCMs HYD-1** and **HYD-2** and compliance with the Section 18.212.030 of the City's Municipal Code, potential impacts related to soil erosion or loss of topsoil with implementation of the proposed project would be **less than significant**, and no mitigation is required .

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?

Less Than Significant Impact

Discussion of Effects: As discussed under Section 3.7(a)(iv) above, the project site is not located within an area susceptible to landslides. Due to the project site's flat topography, the absence of significant nearby slopes or hills, and the planned site grading in accordance with **RCM GEO-1**, **no impact** from landslides or slope instabilities would occur.

As discussed under Section 3.7(a)(iii), no groundwater was encountered to the maximum depth drilled of 51.5 feet bgs, and the liquefaction analysis concluded that no liquefaction would occur at the project site. According to the Geotechnical Investigation, the project site generally consists of surficial fill underlain by natural deposits of silty sand and/or clayey silt, and relatively clean sand soils. According to the Geotechnical Investigation, the native soils found below the surficial fill were found to be generally firm in-place with moderate strength and compressibility and the project site's upper soils were found to be granular in nature and virtually non-expansive. Therefore, the Geotechnical Investigation determined that the proposed project would not be located on any unstable soils. With adherence to **RCM GEO-1**, impacts from subsidence and/or collapse would be **less than significant**, and no mitigation is required.

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

Less Than Significant Impact

Discussion of Effects: As described above under Section 3.7(c), the near surface soils on the project site have a very low expansion potential and are not anticipated to pose a hazard for the proposed project. Therefore, impacts related to being located on expansive soils would be **less than significant,** and no mitigation is required.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact

Discussion of Effects: The proposed project would connect to existing wastewater collection and conveyance facilities owned and operated by the City in the surrounding area. Therefore, the use of septic tanks would not be necessary. Because the proposed project would not include the installation of septic tanks or alternative wastewater disposal systems, **no impact** would occur.

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

Less Than Significant Impact with Mitigation Incorporated

Discussion of Effect: According to the City's General Plan EIR, paleontological resources, including fossils, have been found throughout the city and there is potential for paleontological finds to occur in remaining, unexcavated open space areas within and adjacent to the city. Paleontological resources are the fossil remains or traces of past life forms, including both vertebrate and invertebrate species, as well as plants. These resources are found in geologic strata conducive to their preservation, typically sedimentary formations. In the past, paleontological resources have been identified in the San Timoteo Canyon area.

The soils on the project site generally consist of surficial fill underlain by natural deposits of silty sand and/or clayey silt, and relatively clean sand soils. Mission Channel is adjacent to the southwest border of the project site and a small orchard exists north of the project site; however, the project site has generally remained undeveloped. In addition, the project site is approximately 2.7 miles northwest of San Timoteo Canyon, the nearest area of paleontological significance identified in the City's General Plan EIR. In its existing state, no unique geologic features are present on the project site, and no unique geologic features would be destroyed, either directly or indirectly, as a result of the proposed project's actions.

General Plan Objective OSC-7.1, Policy P3 requires the appropriate protection, evaluation, and recovery of any potential paleontological resource to a less than significant level. Although no known paleontological resources exist on the proposed project site and surrounding area, because of the citywide potential to encounter paleontological resources, unknown/undiscovered resources could be encountered during on-site grading or construction activities. As such, **MM GEO-1** is required to reduce any potential impact on unknown and unanticipated paleontological resources on the project site. As required by **MM GEO-1**, if paleontological resources are unintentionally unearthed during project construction, work would be temporarily halted until the significance of the find is determined by a qualified paleontologist and appropriate actions are taken.

MM GEO-1 **Paleontological Resources.** Prior to the issuance of a grading permit, the Applicant shall retain a qualified paleontologist, subject to the review and approval of the Director of the City of Redlands Department of Development Services, Planning Division, or designee. The qualified paleontologist shall be present at the pre-grade conference and shall establish procedures for paleontological resource surveillance and procedures for temporarily halting and redirecting work to permit sampling and identification and evaluation of fossils. If the resources are deemed to be significant, the paleontologist shall determine appropriate actions, in cooperation with the Applicant, which ensure proper exploration and/or salvage. Full-time monitoring and salvage efforts will be necessary whenever previously undisturbed sediments are being disturbed (8 hours per day during grading or trenching activities). Once the earth moving is 50 percent completed, monitoring may be reduced if no fossils are being recovered. The paleontologist shall be empowered to temporarily divert or direct grading operations to facilitate assessment and salvaging of exposed fossils. Collection and processing of matrix samples through fine screens will be necessary to salvage any micro-vertebrate remains.

In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor shall temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery shall

be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the monitor shall remove the rope and allow grading to recommence in the area of the find. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the proposed project in order to mitigate adverse impacts to paleontological resources that may exist on-site in on-site sediments. The PRIMP shall follow guidelines developed by the Society for Vertebrate Paleontology and shall include, but not be limited to, monitoring of earthmoving activities during project excavation in native sediments, specimen recovery, and screen washing; preparation of any collected specimens to the point of identification; identification and curation of any collected specimens into a museum repository with permanent, retrievable storage; and preparation of a final compliance report that would provide details of monitoring, fossil identification, cataloging, and repository arrangements. The PRIMP shall be filed with the Director of the City of Redlands Department of Development Services, Planning Division, or designee, prior to the issuance of a grading permit.

With implementation of **MM GEO-1,** potential impacts to paleontological resources would be **less than significant with mitigation incorporated**.

3.8 GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less than Significant 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?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

The information and analysis in this section have been prepared based on the Air Quality, Greenhouse Gas, and Energy Impact Study[24] (**Appendix A**) prepared by MD Acoustics, LLC and dated February 17, 2025.

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

Less Than Significant Impact.

Discussion of Effects: *State CEQA Guidelines* Section 15064(b) provides that the "determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data," and further states that an "ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting."

Appendix G of the *State CEQA Guidelines* includes significance thresholds for greenhouse gas (GHG) emissions. A project would normally have a significant effect on the environment if it would do either of the following:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions. Similarly, the South Coast Air Quality Management District (SCAQMD), California Air Resources Board (CARB), or any other State or regional agency have not yet adopted a numerical significance threshold for assessing GHG emissions that is applicable to the proposed project. Since there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the proposed project's impacts related to GHG emissions focuses on its consistency with

[24] MD Acoustics, LLC. 2025a. 913 California Street Air Quality, Greenhouse Gas, and Energy Impact Study, City of Redlands, CA. February 17.

statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the project's GHG-related impacts on the environment.

Notwithstanding, for informational purposes, the analysis also calculates the amount of GHG emissions that would be attributable to the proposed project using recommended air quality models, as described below. The primary purpose of quantifying the proposed project's GHG emissions is to satisfy *State CEQA Guidelines* Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. The estimated emissions inventory is also used to determine if there would be a reduction in the proposed project's incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions.

The proposed project would result in direct and indirect emissions of carbon dioxide (CO_2), nitrous oxide (N_2O), and methane (CH_4), and would not result in other GHGs that would facilitate a meaningful analysis. Therefore, this analysis focuses on these three forms of GHG emissions. Direct project-related GHG emissions include emissions from construction activities, area sources, and mobile sources, while indirect sources include emissions from energy consumption, water demand, and solid waste generation. The most recent version of CalEEMod (version 2022.1.1.22) was used to calculate project related GHG emissions. **Table 3.8.A: Estimated Project Greenhouse Gas Emissions** presents the estimated CO_2, N_2O, and CH_4 emissions of the proposed project. CalEEMod outputs are contained within **Appendix A**.

Table 3.8.A: Estimated Project Greenhouse Gas Emissions

Category	Pollutant Emissions (MT per year)[1]			
	CO_2	CH_4	N_2O	CO_2e
Area Sources	1.33	0.00	0.00	1.33
Energy Usage	378.00	0.03	0.00	380.00
Mobile Sources	2,248.00	0.11	0.11	2,288.00
Solid Waste	6.91	0.69	0.00	24.20
Water Demand	6.09	0.10	0.00	9.25
Refrigerants	0.00	0.00	0.00	119.00
Construction[3]	12.80	0.00	0.00	12.97
Total Emissions	2,647.04	0.93	0.11	2,834.75
Total Project-Related Emissions[3]				**2,834.75**
SCAQMD Draft and San Bernardino County Screening Threshold				**3,000**
Exceeds Threshold?				**No**

Source: 913 California Street Air Quality, Greenhouse Gas, and Energy Impact Study (MD Acoustics, LLC, February 17, 2025) **(Appendix A)**.

[1] Emissions calculated using CalEEMod Version 2022.1.1.22

[2] Total project construction GHG emissions equate to 389 MT CO_2e. However, construction emissions are amortized over the lifetime of the project (assumed to be 30 years) and added to operational GHG emissions consistent with SCAQMD's guidance.

CalEEMod = California Emissions Estimator Model
CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent
GHG = greenhouse gas
MT = metric tons
N_2O = nitrous oxide
SCAQMD = South Coast Air Quality Management District

Construction. Construction activities associated with the proposed project would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O. Furthermore, CH_4 is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

As mentioned above, the SCAQMD and the City do not provide a separate GHG significance threshold for construction emissions; rather, applicable guidance specifies that construction emissions should be amortized over 30 years (a typical project's lifetime), added to the project's operational emissions, and that total compared to the GHG significance threshold. **Table 3.8.B: Construction Greenhouse Gas Emissions** shows the emissions estimated from the proposed project from all phases of construction.

Table 3.8.B: Construction Greenhouse Gas Emissions

Activity	Emissions (MT CO_2e)[1]
2024[2]	118.00
2025	271.00
Total	389.00
Averaged over 30 years [3]	12.97

Source: 913 California Street Air Quality, Greenhouse Gas, and Energy Impact Study (MD Acoustics, LLC, February 17, 2025) **(Appendix A)**.

[1] MT CO_2e=metric tons of carbon dioxide equivalents (includes carbon dioxide, methane, and nitrous oxide).

[2] Since the GHG analysis from this project was originally done, project construction has shifted to 2025. As GHG emissions decrease every year, the emissions generated from the proposed project in 2025 will likely be less than shown in the table above.

[3] The emissions are averaged over 30 years because the average is added to the operational emissions, pursuant to SCAQMD. * CalEEMod output **(Appendix A)**

CalEEMod = California Emissions Estimator Model
GHG = greenhouse gas
SCAQMD = South Coast Air Quality Management District

As shown in **Table 3.8.B,** construction of the proposed project would generate a total of approximately 389.00 MT CO_2e. The amortized construction emissions would be approximately 12.97 metric tons (MT) of CO_2 equivalents (CO_2e) per year (refer to the CalEEMod output in **Appendix A** for details). In accordance with SCAQMD's guidance, **Table 3.8.A** shows the amortized construction emissions added to the project operational emissions and the total emissions compared to the GHG significance threshold to evaluate the proposed project's operational emissions impact, as discussed below.

Since there is no separate GHG significance threshold for construction emissions, project-level and cumulative GHG emissions during construction activities alone would be **less than significant**, and no mitigation is required.

Operation. Long-term GHG emissions are typically generated from mobile sources (e.g., cars, trucks, and buses), area sources (e.g., maintenance activities and landscaping), indirect emissions from sources associated with energy consumption, waste sources (land filling and waste disposal), and water sources (water supply and conveyance, treatment, and distribution). Mobile-source GHG emissions would include project-generated vehicle and truck trips to and from the project site. Area-source emissions would be associated with activities such as landscaping and maintenance on the project site.

Waste source emissions generated by the proposed project include energy generated by land filling and other methods of disposal related to transporting and managing project-generated waste. Refrigerant source emissions are generated by the substances used in equipment for air conditioning and refrigeration. Operational GHG emissions associated with the proposed project are shown in **Table 3.8.A** above.

As shown in **Table 3.8.A**, the total amount of project-related GHG emissions from direct and indirect sources combined would total 2,834.75 MT CO_2e per year. As such, the proposed project's emission would be below the County of San Bernardino CAP and SCAQMD screening threshold of 3,000 MT CO_2e per year. As such, impacts would be **less than significant**, and no mitigation is required.

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

Less Than Significant Impact

Discussion of Effects: The GHG plan consistency analysis provided below is based on the project's consistency with the City's General Plan and CAP, Southern California Association of Governments' (SCAG) 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and CARB's 2022 Scoping Plan. The General Plan contains goals and principles to reduce GHG emissions in the City. The 2024–2050 RTP/SCS is a regional growth management strategy that targets per-capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region. The 2024–2050 RTP/SCS incorporates local land use projections and circulation networks in City and County general plans. The 2022 Scoping Plan identifies strategies to achieve carbon neutrality by 2050 or earlier.

SCAG 2024-2050 RTP/SCS. In April 2024, the Regional Council of SCAG formally adopted the 2024–2050 RTP/SCS. The 2024–2050 RTP/SCS includes performance goals that were adopted to help focus future investments on the best-performing projects, as well as different strategies to preserve, maintain, and optimize the performance of the existing transportation system. The objectives of the 2024–2050 RTP/SCS are to create a region with: transit as a backbone of the transportation system; more Complete Streets where people and safety are prioritized; policies that encourage emerging technologies and mobility innovations that support rather than hamper regional goals; more housing, jobs, and mobility options closer together in Priority Development Areas to preserve natural lands and open spaces; more housing to address the existing housing need as defined by the RHNA; safe and fluid movement of goods, with a commitment to the broad deployment of zero- and near-zero emission technologies. The proposed project would be required to comply with the latest California Building Code (CBC) and California Green Building Standards Code (CALGreen Code) and would not impede the attainment of the objectives of the 2024–2050 RTP/SCS. As such, the proposed project would be consistent with the applicable GHG reduction goals within the SCAG 2024–2050 RTP/SCS.

2022 CARB Scoping Plan. The 2022 Scoping Plan identifies reduction measures necessary to achieve the goal of carbon neutrality by 2045 or earlier. Actions that reduce GHG emissions are identified for each Assembly Bill (AB) 32 inventory sector. Provided in **Table 3.8.C: Consistency with the 2022 Scoping Plan: AB 32 GHG Inventory Sectors,** is an evaluation of applicable reduction actions/strategies by emissions source category to determine how the project would be consistent with or exceed reduction actions/strategies outlined in the 2022 Scoping Plan. In addition, as discussed above, the proposed project would be required to comply with the latest CBC and CALGreen Code Standards. As such, the proposed project would be consistent with the applicable GHG reduction goals within the 2022 CARB Scoping Plan.

Table 3.8.C: Consistency with the 2022 Scoping Plan: AB 32 GHG Inventory Sectors

Actions and Strategies[1]	Project Consistency Analysis
Smart Growth/Vehicles Miles Traveled (VMT)	
Reduce VMT per capita to 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045	**Consistent.** The proposed project would construct a business hotel, drive-through coffee shop, semi-automated car wash, and associated circulation, parking, infrastructure, and landscaping improvements on undeveloped land. The project site is in an urbanized area and within walking and biking distance of existing residential and commercial uses. As such, the proposed project's future users would enjoy greater access to residences, work, educational, and other destinations, reducing VMT. As such, the proposed project would be consistent with this action.
New Residential and Commercial Buildings	
All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030.	**Consistent**. The proposed project is anticipated to include natural gas heating and/or cooking on-site. The City of Redlands has not adopted an ordinance or program limiting the use of natural gas for on-site cooking and/or heating. However, if adopted, the proposed project would comply with the applicable goals or policies limiting the use of natural gas equipment in the future. As such, the proposed project would be consistent with this action.
Non-combustion Methane Emissions	
Divert 75% of organic waste from landfills by 2025.	**Consistent**. The proposed project would be required to recycle and compost 75 percent of waste per Assembly Bill 341. As such, the proposed project would be consistent with this action.

Source: *2022 Scoping Plan* (California Air Resources Board, November 16, 2022).

General Plan and CAP. The City adopted both the General Plan and CAP on December 5, 2017. The CAP has been prepared concurrently with the updated General Plan, reflecting the City's most current land use and transportation strategy, and GHG implications of various General Plan's goals and principles. The CAP is designed to provide discrete actions to operationalize the General Plan policies that help with GHG reduction. The proposed project would be consistent with the transportation and water utility goals of the CAP by providing EV charging stations for electric vehicles per City requirements and complying with the City's Water Efficient Landscape requirements. The proposed project would also be consistent with the CAP's energy efficiency goals by complying with the latest CBC (Title 24), including the latest CALGreen Code standards. Project construction would also comply with current local and State standards and CAP goals to increase diversion and reduction of waste by diverting construction waste from landfills to recycling. As such, the proposed project would be consistent with the applicable GHG reduction goals within the City's CAP.

In summary, the proposed project complies with the plans, policies, regulations, and strategies outlined in the City's General Plan (and CAP), SCAG's 2024–2050 RTP/SCS, and CARB's 2022 Scoping Plan. Therefore, the proposed project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs, and impacts would be **less than significant.** No mitigation is required.

3.9 HAZARDS AND HAZARDOUS MATERIALS

Would the project:

		Potentially Significant Impact	Less than Significant 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?	☐	☐	☒	☐
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g.	Expose people or structures, directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	☐	☐	☒	☐

The following hazards and hazardous materials analysis is based, in part, on the Phase I Environmental Site Assessment (ESA)[25] (**Appendix E**) prepared by Krazen & Associates, Inc. and dated August 1, 2024, and the Phase II Limited Soil Vapor Assessment[26] (**Appendix F**) prepared by Krazen & Associates, Inc. and dated October 17, 2024. Although these two reports were prepared for the car wash parcel, the Phase I ESA included database review and a field survey for the entire project site.

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

Less Than Significant Impact

Discussion of Effects: Construction of the proposed project has the potential to create a hazard to the public or environment through the routine transportation, use, and disposal of construction-related hazardous materials such as fuels, soils, solvents, and other materials. These materials are typical of materials delivered to construction sites. The amount of hazardous chemicals present during construction would be limited to what is required to operate construction equipment and would be handled in compliance with existing government regulations. The potential for the release of hazardous materials during project construction is low, and even if a release were to occur, it would not result in a significant hazard to the public, surrounding land uses, or the environment due to the small quantities of these materials associated with construction vehicles. In addition, the United States Department of Transportation regulates the transport of hazardous materials and waste in connection with construction of the proposed project and would require carriers to register with the Department of Toxic Substances Control (DTSC).

Operation of the proposed hotel, coffee shop, and car wash is expected to utilize relatively small amounts of hazardous materials, such as chemicals associated with landscape maintenance and equipment, solvents, cleaning products, pesticides/fertilizers, and other similar chemicals. These materials are substantially similar to household chemicals and solvents already in general and wide use throughout the city and in the vicinity of the project site. In addition, such materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be less than significant through compliance with these standards and regulations. Furthermore, operation of the proposed project would not transport, generate, or dispose of large quantities of hazardous substances.

Therefore, with compliance with all applicable federal, State, local, and manufacturer regulations, potential impacts to the public or environment from the routine transportation, use, and disposal of hazardous materials would be **less than significant**, and no mitigation is required.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact

[25] SP2 & Co. 2024a. Preliminary Water Quality Management Plan For: The Commons at California, 913 California St. Redlands, Tentative Parcel Map 20854. April 23.

[26] SP2 & Co. 2024b. Preliminary Drainage Study for Tentative Parcel Map 20854, 913 California St. Redlands, California. April 22.

Discussion of Effects: There are two primary ways that the public and/or the environment could be affected by the release of hazardous materials from the project site, including: (1) exposing workers and/or the public to potentially contaminated soil and groundwater during construction and/or operation of the project; or (2) exposing workers and/or the public to hazardous building materials (e.g., lead paint, asbestos) during demolition of existing structures.

As described above, small quantities of common hazardous materials would be used at the project site during construction and operation of the proposed project. Improper use, storage, or handling could result in a release of hazardous materials into the environment which could pose a risk to construction workers and the public. However, the proposed project would be required to comply with existing government regulations in the use and disposal of these materials, and such materials would not be used in sufficient strength or quantity to create a substantial risk to human or environmental health.

A Phase I ESA (**Appendix E**) was prepared for the proposed car wash parcel in accordance with the standards and procedures outlined in the American Society for Testing and Materials E 1527-21. The Phase I ESA included a review of official government databases concerning the locations of known hazardous materials releases for the purpose of identifying any listings suggesting a potential impact to the proposed car wash parcel due to presence or migration of hazardous substances and/or petroleum products. The report provided a search of standard environmental record sources for listings of the proposed car wash parcel, adjoining properties (which included the entire project site) and sites within the surrounding area. In addition, the project site and the surrounding area were evaluated via the State Water Resources Control Board (SWRCB) GeoTracker database, the DTSC's EnviroStor database, and the Hazardous Waste and Substances Sites (Cortese) list for the purposes of identifying recognized environmental conditions or historical recognized environmental conditions, as discussed in greater detail under Section 3.9(d), below.

"Recognized environmental condition" means the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. The term is not intended to include de minimis conditions that generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be de minimis are not recognized environmental conditions. "Historical Recognized environmental condition" means an environmental condition which in the past would have been considered a recognized environmental condition, but which may or may not be considered a recognized environmental condition currently. If a past release of any hazardous substances or petroleum products has occurred in connection with the property, with such remediation accepted by the responsible regulatory agency (for example, as evidenced by the issuance of a case closed letter or equivalent), this condition shall be considered a historical recognized environmental condition.

The Phase I ESA identified no evidence of recognized environmental conditions (RECs) or historical recognized environmental conditions (HRECs) in connection with the proposed car wash parcel and surrounding area; however, three potential areas of concern were identified. These are discussed below.

Based on historic records, the proposed car wash parcel and surrounding area was utilized for agricultural purposes from at least 1930 until the 1980s. Although there is a potential that environmentally persistent pesticides/herbicides may have been applied to the crops grown on the project site prior to the 1970s, no chemical mixing or chemical storage areas were observed during the site reconnaissance and no material

evidence of the use of environmentally persistent pesticides/herbicides was obtained during the course of this assessment. Therefore, the potential for elevated concentrations of environmentally persistent pesticides/herbicides to currently exist in the near-surface soils of the subject appears to be low.

A former dry cleaner was located approximately 130 feet east of the project site at 2094 West Redlands Boulevard, Suite G. The dry cleaner operated from at least 1997 until 2014 and used perchloroethylene (PCE) in its operation. No spills, releases, or violations are listed for this facility; however, based on the length of operation (approximately 17 years) and the close proximity to the project site, the former dry cleaner represents a potential area of concern in connection with the project site.

In addition, a former gasoline service station was located approximately 140 feet to the north of the project site and was the focus of an investigation for a release of gasoline to groundwater. This leaking underground storage tank (LUST) site was remediated via a soil vapor extraction treatment system and the San Bernardino County Fire Department – Hazardous Materials Division issued case closure with no further action required on October 1, 2008. However, based on the close proximity to the project site, there is potential that hydrocarbon vapors migrated onto the subject site from this former release. Therefore, this LUST site represents a potential environmental concern to the subject site.

Based on the close proximity of the former LUST site and dry cleaners, the Phase I ESA recommended a Phase II Limited Soil Vapor Assessment be conducted to investigate the potential for volatile organic compounds (VOCs) in soil vapor from the former LUST site and the former dry cleaner operations to have impacted the proposed car wash parcel.

As recommended by the Phase I ESA, a Phase II Limited Soil Vapor Assessment (**Appendix F**) was prepared for the proposed car wash parcel. As part pf the Phase II Limited Soil Vapor Assessment, four soil borings were drilled on the proposed car wash parcel to collect and test soil vapor samples for VOCs. The Phase II Limited Soil Vapor Assessment determined that 14 of the 53 VOCs analyzed were detected at or above the laboratory reporting limits (RLs). Of the 14 VOCs detected above the RLs, only PCE, was detected above its corresponding Commercial environmental screening level (ESL). No other VOCs detected at or above the laboratory's RLs were reported above their corresponding Commercial ESLs, where established.

The results indicate a nonhomogeneous PCE soil vapor concentration on the proposed car wash parcel, with a significant reduction from the eastern boundary to the central portion of the parcel. In addition, the Phase II Limited Soil Vapor Assessment indicated the location of the contamination serves as a "hot spot" for PCE soil vapor and does not accurately reflect the subsoil conditions of the proposed car wash parcel and surrounding area. Further, the location of the proposed car wash would serve as a vapor intrusion mitigation measure against the PCE soil vapor concentration, consistent with the United States Environmental Protection Agency's (USEPA) Office of Solid Waste and Emergency Response (OSWER) *Technical Guide For Assessing and Mitigating the Vapor Intrusion Pathway From Subsurface Vapor Sources to Indoor Air*. Therefore, PCE at concentrations exceeding its corresponding Commercial ESL was not deemed to pose a significant health risk to future on-site workers. Soil vapor samples from other areas of the proposed car wash parcel are considered a better representation of the project site's subsoil condition, indicating the proposed indoor area PCE soil vapor concentration is below their respected Commercial ESL.

Although the project site currently contains three potential areas of concern associated with historical pesticide use at the project site and a LUST site near the project site, results from the Phase II Limited Soil Vapor Assessment determined that PCE concentrations near the proposed project are not deemed to

pose a significant health risk to future on-site workers. Therefore, impacts would be **less than significant**, and no mitigation measures would be required.

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

Less Than Significant Impact

Discussion of Effects: The proposed project would not produce or emit hazardous emissions or handle a significant amount of hazardous or acutely hazardous materials, substances, or wastes during either construction or operations. The nearest school facility in proximity to the project site is Mission Elementary School, located at 10568 California Street in the City of Loma Linda, approximately 0.06 mile to the south. As discussed above under Section 3.9(a), construction activities associated with the proposed project would use a limited amount of hazardous and flammable substances/oils during heavy equipment operation for site excavation, grading, and construction. The amount of hazardous chemicals present during construction would be limited and would be in compliance with existing government regulations.

During operation, the proposed project would not require the use, storage, disposal, or transport of large volumes of hazardous materials that could cause serious environmental damage in the event of an accident. Although hazardous substances would be present and utilized in limited amounts within the project site, they would typically be present in small quantities and can be cleaned up without affecting the environment. Therefore, although the project site is within 0.25 mile of an existing school, impacts related to hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste would be **less than significant**, and no mitigation is required.

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?

No Impact

Discussion of Effects: The project site and a 0.5-mile radius encompassing the project site were evaluated via the SWRCB's GeoTracker database,[27] the DTSC's EnviroStor database,[28] and the Cortese List[29] for the purposes of identifying hazardous materials sites associated with the project site. The project site is not included on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. In addition, the three hazardous materials sites within a 0.5 mile of the project site were listed as closed. A closed site indicates that regulatory requirements for response actions, such as site assessment and remediation, have either been completed or were not necessary and therefore potential migration of residual contaminants in groundwater beneath the project site does not likely pose a risk to human health

[27] State Water Resources Control Board (SWRCB). 2022b. Geotracker Database. Website: https://geotracker.waterboards.ca.gov/ (accessed August 2024).

[28] California Department of Toxic Substances Control (DTSC). 2022. EnviroStar Database. Website: https://www.envirostor.dtsc.ca.gov/public/ (accessed August 28, 2024).

[29] California Environmental Protection Agency. 2020. Cortese List Data Resources. Website: calepa.ca.gov/sitecleanup/corteselist/ (accessed August 2024).

and the environment. Therefore, **no impact** associated with the proposed project being included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 would occur.

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 for people residing or working in the project area?

No Impact

Discussion of Effects: The project site is located approximately 1.7-miles southeast of San Bernardino International Airport and approximately 4.4-miles southwest of Redlands Municipal Airport. The project site is located outside the Airport Compatibility Zones of both San Bernardino International Airport and Redlands Municipal Airport. **No impact** related to the project's vicinity to a public airport would occur, and no mitigation is required.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact

Discussion of Effects: Emergency management in the city is coordinated within the Redlands Fire Department (RFD). Emergency management is the framework for which companies, communities, and organizations respond to natural and man-made disasters and acts of terrorism, and is focused on mitigating the risks, preparing for possible catastrophes and disasters, responding to threats or actual disasters and recovering from disaster.[30]

The proposed project includes the construction of a new hotel, coffee shop, and car wash, and associated circulation, parking, infrastructure, and landscaping improvements in accordance with applicable standards associated with vehicular access, resulting in the provision of adequate emergency access and evacuation. Vehicular access to the project site would be provided through a new main signalized entrance and secondary right in right out entrance off California Street. The main signalized entrance would be located near the center of the eastern side of the project site and the secondary entrance would be located at the southeast corner of the project site. In addition, a new street connection from the main entrance would provide access to the proposed car wash. Drive aisles, specifically for the hotel and coffee shop, would facilitate traffic circulation throughout the project site. The main signalized entrance would also provide emergency and fire access for first responders and internal drive aisles would be designed to provide adequate fire access.

The design of the proposed project would be submitted for review and approval by the RFD and Redlands Police Department (RPD) prior to the issuance of building permits in order to ensure development would not interfere with the City's Emergency Management framework. In addition, adherence to the emergency access measures required by the City would ensure that potential impacts related to physical interference with an adopted emergency response plan or emergency evacuation plan would be **less than significant**, and no mitigation is required.

[30] City of Redlands. n.d.-a. Emergency Management. Website: https://www.cityofredlands.org/emergency-management-0 (accessed December 2024).

g. Expose people or structures to a significant risk of loss, injury or death involving wildland fires.

Less Than Significant Impact

Discussion of Effects: According to the California Department of Forestry and Fire Protection (CAL FIRE)[31], the project site is not located within a Fire Hazard Severity Zone, and the City's General Plan EIR indicates that the project site is located in an area designated as having a moderate threat of fire. However, no hillside areas or natural areas prone to wildfires are located in the immediate project vicinity as this area of the city is urbanized with residential neighborhoods and commercial areas. Due to the nature of the project vicinity, on-site and adjacent areas have minimal capability to support a wildfire. The proposed project would be required to implement and abide by Redlands General Plan policies (specifically Policies 7-A.83 through 7-A.106) that promote fire safety through agency cooperation and management of risk factors; adhere to applicable building and fire codes; and implement existing programs such as weed abatement and education under the Redlands Fire Department; all of which would reduce the wildfire risk at the project site. In addition, the proposed project will be designed in accordance with current California Fire Code Standards, which include requirements for internal road widths, access points to the project site, and construction fire suppression techniques. Proper enforcement of these existing regulations will ensure that implementation of the proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be **less then significant**, and no mitigation is required.

[31] California Department of Forestry and Fire Protection (CAL FIRE). 2025. Fire Hazard Severity Zones. March 24. Website: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones (accessed March 2025).

3.10 HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less than Significant 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 groundwater quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere with groundwater recharge such that the project may impede substantial groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner, which would:				
i. Result in substantial erosion or siltation on or off site?	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?	☐	☐	☒	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☒	☐
d. Result in flood hazard, tsunami, or seiche zones, or risk release of pollutants due to project inundation?	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

The following hydrology and water quality analysis is based, in part, on the Preliminary Water Quality Management Plan[32] (**Appendix G**) prepared by SP2 & Co. and dated May 20, 2025, the Preliminary Drainage Study[33] (**Appendix H**) prepared by SP2 & Co. and dated April 4, 2025, and the Geotechnical Investigation[34] (**Appendix D**) prepared by Applied Earth Sciences and dated November 30, 2023, which was updated to reflect project changes in a letter report dated April 18, 2025.

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant Impact

Discussion of Effects: The State Water Resources Control Board (SWRCB) and nine Regional Water Quality Control Boards (RWQCBs) regulate the quality of surface water and groundwater bodies throughout California. In the City of Redlands, the Santa Ana RWQCB is responsible for implementation of the Water Quality Control Plan (Basin Plan). The Basin Plan establishes beneficial water uses and water quality objectives for waterways and water bodies within the region. Section 303(d) of the federal Clean Water Act requires that states identify water bodies, including bays, rivers, streams, creeks, and coastal areas, which do not meet water quality standards and the pollutants that are causing the impairment. Total Maximum Daily Loads (TMDLs) describe the maximum amount of a pollutant that a water body can receive while still meeting established water quality standards. A TMDL establishes limits for pollutant discharges into impaired water bodies.

The proposed project site is currently covered entirely by pervious surfaces. The existing topography of the project site gently slopes from northeast to southwest towards the existing drainage channel, Mission Channel, along the southwest boundary of the project site, with approximately 0.5 to 2 percent slopes. Under existing conditions, stormwater at the project site either infiltrates at the project site or sheet flows southwest to discharge into Mission Channel. Mission Channel discharges into the Santa Ana River (Reaches 3 and 4), which passes through Prado Dam and Orange County before discharges into the Pacific Ocean at Huntington State Beach. The SWRCB Surface Water Quality Assessment 2020–2022 Integrated Report for Clean Water Act Sections 303(d) and 305(b) does not list any impairments for the Mission Channel. Santa Ana River (Reach 3) is listed as an impaired water body for pathogens and metals (lead and copper), Santa Ana River (Reach 4) is listed as impaired for pathogens, and Prado Dam is listed as impaired for pH.[35] TDMLs have been adopted for these constituents, which would be applicable to the proposed project.

Runoff water quality is regulated by the Nation Pollution Discharge Elimination System (NPDES) Program (established through the federal Clean Water Act). The NPDES Program objective is to control and reduce

[32] SP2 & Co. 2025. Preliminary Water Quality Management Plan For: The Commons at California, 913 California St. Redlands, Tentative Parcel Map 20854. May 20.

[33] SP2 & Co. 2025. Preliminary Drainage Study for Tentative Parcel Map 20854, 913 California St. Redlands, California. April 4.

[34] Applied Earth Sciences, Geotechnical & Environmental Engineering Consultants. 2025. Report of Geotechnical Investigation and Percolation testing for SUSMP, proposed Commercial Development Project, APN: 0292034170000, 913 California Street, Redlands, California 92374. April 18.

[35] SWRCB. 2023. 2020–2022 California Integrated Report (Clean Water Act Section 303(d) List and 305(b) Report). Website: https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.waterboards.ca.gov%2Fwater_issues%2Fprograms%2Ftmdl%2F2020_2022state_ir_reports_revised_final%2Fapx-a-303d-list.xlsx&wdOrigin=BROWSELINK (accessed November 2024).

pollutant discharges to surface water bodies. Compliance with NPDES permits is mandated by State and federal statutes and regulations. Locally, the NPDES Program is administered by the Santa Ana RWQCB.

Construction activities are subject to the SWRCB's *NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities*, *Order No. 2022-0057-DWQ, NPDES No. CAS000002* (Construction General Permit).[36] Any construction activity, including grading, that would result in the disturbance of 1 acre or more would require compliance with SWRCB's Construction General Permit, which requires preparation of a Storm Water Pollution Prevention Plan (SWPPP) and implementation of Construction Best Management Practices (BMPs) during construction activities. Construction BMPs would include, but not be limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site, and Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters.

The City is a co-permittee under the Santa Ana RWQCB's *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 Area-Wide Urban Stormwater Runoff Management Program, Order No. R8-2010-0036, NPDES No. CAS618036* (San Bernardino County Municipal Separate Storm Sewer System [MS4] Permit).[37] The San Bernardino County MS4 Permit requires the preparation of project-specific Water Quality Management Plans (WQMPs) for priority projects. The Final WQMP would specify the Site Design, Source Control, Low Impact Development (LID), and Treatment Control BMPs that would be implemented to capture, treat, and reduce pollutants of concern in storm water runoff. Site Design BMPs are storm water management strategies that emphasize conservation and use of existing site features to reduce the amount of runoff and pollutant loading generated from a site. Source Control BMPs are preventative measures that are implemented to prevent the introduction of pollutants into storm water. LID BMPs mimic a project site's natural hydrology by using design measures that capture, filter, store, evaporate, detain, and infiltrate runoff rather than allowing runoff to flow directly to piped or impervious storm drains. Treatment Control BMPs are structural BMPs designed to treat and reduce pollutants in storm water runoff prior to releasing it to receiving waters.

Construction. The proposed project includes the subdivision of the project site into three parcels in order to facilitate the development of a four story, 55,186-square-foot business hotel, containing 90 rooms (Parcel 1), an 1,450-square-foot drive-through coffee shop (Parcel 2), an 3,588-square-foot semi-automated car wash (Parcel 3), and associated parking, infrastructure, and landscaping improvements on the undeveloped, 5.1-acre project site.

Pollutants of concern during construction include pathogens, nutrients (phosphorous and nitrogen), sediment, metals, oil and grease, trash/debris, pesticides/herbicides, and organic compounds. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. During construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and sedimentation compared to existing conditions. In addition, chemicals, liquid

[36] SWRCB. 2022a. National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, Order No. 2022-0057-DWQ, NPDES No. CAS000002. September 8. Effective September 1, 2023.

[37] SWRCB. 2010. Order No. R8-2010-0036, NPDES No. CAS618036, 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 Area-Wide Urban Stormwater Runoff Management Program. Santa Ana Region. January 29.

products, petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste may be spilled or leaked during construction. Any of these pollutants have the potential to be transported via storm water runoff into receiving waters (i.e., Mission Channel, Santa Ana River Reaches 3 and 4, Prado Dam, and the Pacific Ocean).

Construction of the proposed project is anticipated to disturb the entire 5.1-acre project site. Because project construction would disturb greater than 1 acre of soil, the proposed project would be subject to the requirements of the Construction General Permit. The proposed would also be required to comply with the City's Municipal Code Chapter 13.54. Chapter 13.54 prohibits land disturbance or construction activities without first obtaining coverage under the State Construction General Permit, development of a SWPPP, and implementation of BMPs to ensure that construction practices include measures to address pollutant discharge into storm drains. As specified in **RCM HYD-1,** and as required by the Construction General Permit and the City's Municipal Code, the Construction Contractor would be required to prepare a SWPPP and implement Construction BMPs detailed in the SWPPP during construction activities. Construction BMPs would include, but not be limited to, erosion and sediment control (designed to minimize erosion and retain sediment on site), and good housekeeping practices to prevent spills, leaks, and discharge of construction debris and waste into receiving waters.

RCM HYD-1 **Construction General Permit and Chapter 13.54 of the City's Municipal Code.** Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board (SWRCB) *National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements for Discharges of Stormwater Runoff Associated with Construction and Land Disturbance Activities, Order No. 2022-0057-DWQ, NPDES No. CAS000002* (Construction General Permit). This shall include submission of Permit Registration Documents (PRDs), including a Notice of Intent for coverage under the permit to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTS). The Applicant shall provide the Waste Discharge Identification Number (WDID) to the Director of the City of Redlands Department of Municipal Utilities and Engineering, or designee, to demonstrate proof of coverage under the Construction General Permit. Project construction shall not be initiated until a WDID is received from the SWRCB and is provided to the City, or designee. A Stormwater Pollution Prevention Plan (SWPPP) shall be prepared and implemented for the proposed project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify Construction Best Management Practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in storm water runoff as a result of construction activities. Upon completion of construction and stabilization of the site, a Notice of Termination shall be submitted via SMARTS.

As required by Chapter 13.54 of the City's Municipal Code, the SWPPP shall be submitted to the City for review and approval to ensure the identified BMPs would protect water quality during construction activities pursuant to Chapter 13.54.

According to the Geotechnical Investigation prepared for the proposed project, no groundwater was encountered to the maximum depth drilled of 51 feet below the existing ground surface (bgs). Excavation at the project site during construction of the proposed project is anticipated to extend to a maximum depth of 15 feet bgs for installation of utility improvements. Therefore, it is unlikely that excavation activities would have the potential to encounter groundwater and groundwater dewatering is not anticipated to be required during construction activities.

With adherence to **RCM HYD-1**, including preparation of a SWPPP and implementation of Construction BMPs, impacts associated with the violation of water quality standards or waste discharge requirements during project construction would be **less than significant**, and no mitigation is required.

Operation. As previously discussed, the City is a co-permittee under the Santa Ana RWQCB's San Bernardino County MS4 Permit, which requires the preparation of project-specific WQMPs for priority projects. The proposed project is considered a priority project because it involves the development of more than 10,000 square feet of impervious surface and because it includes more than 5,000 square feet of parking lots that would be exposed to stormwater runoff. As specified in **RCM HYD-3** and required by the San Bernardino County MS4 Permit, the Applicant would be required to prepare a Final WQMP. The Final WQMP would specify the Site Design, Source Control, LID, and Treatment Control BMPs that would be implemented to capture, treat, and reduce pollutants of concern in storm water runoff.

A Preliminary WQMP has been prepared for the proposed project that details the following Operational BMPs that would be implemented to reduce impacts to water quality from operation of the proposed project:

1. **Site Design BMPs** include minimizing impervious surface areas; maximizing natural infiltration capacity; preserving existing on-site drainage patterns; re-vegetating disturbed areas; minimizing unnecessary compaction in stormwater retention/infiltration basin/trench areas; utilizing vegetated drainage swales in place of underground piping or imperviously lined swales; and staking off areas that will be used for landscaping to minimize compaction during construction.

2. **Non-Structural Source Control BMPs** include education of property owners regarding potential impacts to downstream water quality; activity restrictions; landscape management BMPs, such as mowing lawns, pruning vegetation, and removal of invasive plant species; employee training on stormwater BMPs; catch basin inspection program; vacuum sweeping of private streets and parking lots, and compliance with all applicable NPDES permits.

3. **Structural Source Control BMPs** include storm drain stenciling and signage; trash and waste storage areas that are designed and constructed to reduce pollution introduction, efficient irrigation systems and landscape design; the protection of slopes and channels through the provision of energy dissipation; spill containment plans for vehicle and equipment wash areas; and wash water control for food preparation.

4. **LID BMPs** include catch basins and curb inlets with filters and infiltration and detention systems.

The proposed project would generally maintain existing drainage pattens at the project site. With implementation of the proposed project, the project site would consist of one drainage area (DA 1) and one drainage management area (DMA A) to manage stormwater on the project site.

DMA A would be 215,657 square feet and would manage stormwater runoff from the entire project site. Stormwater runoff from impervious areas (e.g., concrete, asphalt, and roofs) within DMA A would be directed to proposed inlets with storm filters and discharged into a 7,471-square-foot infiltration basin (Basin A) located in the northwest corner of the project site. Basin A would be appropriately sized to retain and infiltrate the required Design Capture Volume (DCV) for the entire project site (10,795 cubic feet) while detaining and mitigating the developed peak runoff such that the 100-year outflows would be less than the 25-year existing event, as required by the San Bernardino County MS4 Permit. The DCV is the volume of stormwater runoff that must be captured and treated by stormwater BMPs. Emergency overflow and mitigated peak runoff from Basin A would be discharged into Mission Channel via a calibrated outlet structure, similar to existing conditions.

Infiltration of stormwater could have the potential to affect groundwater quality. As discussed above, the proposed project includes site design, source control, and LID BMPs, including catch basins and curb inlets with storm filters to capture trash and debris to reduce pollutants of concern in stormwater prior to entering the underground chambers and infiltrating into the soil. Furthermore, when storm water is infiltrated, soil and plants absorb and filter pollutants and reduce the potential for pollutants of concern to reach groundwater. As specified in **RCM HYD-2**, a Final WQMP would be prepared in compliance with the San Bernardino County MS4 Permit prior to or during final design, which would ensure that the proposed project design would adequately target pollutants of concern in stormwater runoff before infiltrating into the soil.

RCM HYD-2 **San Bernardino County MS4 Permit.** Prior to issuance of a grading permit, the Applicant shall submit a Final Water Quality Management Plan (WQMP) to the Director of the City of Redlands Department of Development Services review and approval in compliance with the requirements of the Santa Ana Regional Water Quality Control Board's (RWQCB) *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 Area-Wide Urban Stormwater Runoff Management Program, Order No. R8-2010-0036, NPDES No. CAS618036* (San Bernardino County Municipal Separate Storm Sewer System [MS4] Permit). The Final WQMP shall specify the Best Management Practices (BMPs) to be incorporated into the project design to target pollutants of concern in storm water runoff from the project site and the necessary operation and maintenance activity for each BMP. The City shall ensure that the BMPs specified in the Final WQMP are incorporated into the final Project design. The proposed BMPs specified in the Final WQMP shall be incorporated into the grading and development plans submitted to the City for review and approval. Project occupancy and operation shall be in accordance with the schedule outlined in the WQMP.

With adherence to **RCM HYD-2**, which requires adherence to the San Bernardino County MS4 Permit, including preparation of a Final WQMP to address pollutants of concern in storm water runoff, potential impacts associated with the violation of water quality standards or waste discharge requirements during operation of the proposed project would be **less than significant**, and no mitigation is required.

Overall, with adherence to **RCMs HYD-1** and **HYD-2**, the proposed project would not violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or groundwater quality, during construction or operation. Impacts would be **less than significant**, and no mitigation is required.

b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that may impede substantial groundwater management of the basin?

Less Than Significant Impact

Discussion of Effects: The project site is located within the boundaries of the Upper Santa Ana Valley Groundwater Basin, Bunker Hill Subbasin, which underlies San Bernardino County and the city.[38] The surface area of the basin is approximately 89,600 acres or 120 square miles, with average annual rainfall over the basin ranging from approximately 12 to 31 inches. The subbasin is bounded by contact with consolidated rocks of the San Gabriel Mountains, San Bernardino Mountains, and Crafton Hills, and by several faults. The southern boundary is the Banning fault, the east boundary is the Redlands fault, the San Andreas fault is roughly the northern boundary, the Glen Helen fault abuts the northwest boundary, and the southwest boundary is the San Jacinto fault. The Santa Ana River, Mill Creek, and Lytle Creek are the main tributary streams in the subbasin.[39]

The estimated groundwater storage capacity of the Bunker Hill Subbasin is 5,976,000 acre-feet (af), and in 1998 the calculated groundwater in storage was 5,890,300 af.[40] Natural recharge to the basin is primarily from infiltration of runoff from the San Gabriel and San Bernardino Mountains, with the Santa Ana River, Mill Creek, and Lytle Creek contributing more than 60 percent of the total recharge to the groundwater 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.[41]

Construction. According to the Geotechnical Investigation prepared for the proposed project, no groundwater was encountered to the maximum depth drilled of 51 feet bgs. Excavation at the project site during construction of the proposed project is anticipated to extend to a maximum depth of 15 feet bgs for installation of utility improvements. Therefore, it is unlikely that excavation activities would have the potential to encounter groundwater and groundwater dewatering is not anticipated to be required during construction activities. Furthermore, according to the Preliminary Water Quality Management Plan, soil compaction would be minimized during construction, which would promote natural infiltration during construction activities, and the proposed project would maximize natural infiltration capacity at the project site. Therefore, construction impacts related to a decrease in groundwater supplies or interference with groundwater recharge in a manner that may impede sustainable groundwater management would be **less than significant**, and no mitigation is required.

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38 California Department of Water Resources. n.d.-b. Groundwater Basin Boundary Assessment Tool. Website: https://gis.water.ca.gov/app/bbat/ (accessed November 2024).

39 California Department of Water Resources. 2004. Upper Santa Ana Valley Groundwater Basin, Bunker Hill Subbasin Bulletin 118. February 27.

40 Ibid.

41 Ibid.

Operation. Currently, the project site is undeveloped and entirely covered by pervious surfaces. Implementation of the proposed project would increase impervious surface coverage on the project site compared to existing conditions due to the construction of a four story, 55,186-square-foot business hotel, 1,450-square-foot drive-through coffee shop, 3,588-square-foot semi-automated car wash, and associated parking improvements, which would decrease on-site infiltration. However, as described above under Section 3.10(a), the proposed project would include an infiltration basin to collect and infiltrate stormwater at the project site in accordance with the San Bernardino County MS4 Permit. Therefore, development of the proposed project would not substantially decrease the amount of stormwater that infiltrates as compared to the existing conditions.

As discussed above, the project site is located within the Upper Santa Ana Valley Groundwater Basin, Bunker Hill Subbasin. The Upper Santa Ana Valley Groundwater Basin is identified by the Department of Water Resources as a low priority basin[42] and, therefore, a Groundwater Sustainability Plan is not required for this basin. While groundwater from the Upper Santa Ana Valley Groundwater Basin provides the city with approximately 70 percent of its water supply, the city has sufficient supplies to meet current and future development consistent with its General Plan through the year 2035. As discussed in Section 3.19, Utilities and Service Systems, based on the proposed project's anticipated water demand of 165,497 gallons per year (9.81 af per year [afy]), the proposed project would account for less than 0.1 percent of the total water usage for the city in 2035 and 2045. Because the City has sufficient water supplies to meet current and future development within the city, as indicated in the City's Urban Water Management Plan (UWMP),[43] the proposed project's water demand would not deplete groundwater supplies. Therefore, operational impacts related to a decrease in groundwater supplies or interference with groundwater recharge in a manner that may impede sustainable groundwater management would be **less than significant**, and no mitigation is required.

Overall, implementation of the proposed project would not deplete groundwater supplies or interfere with groundwater recharge during construction or operation such that the proposed project may impede sustainable groundwater management. Impacts associated with groundwater supply and recharge would be **less than significant,** and no mitigation is required.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces in a manner which would:

i Result in substantial erosion or siltation on or off site?

Less Than Significant Impact

Discussion of Effects: In the existing condition, stormwater at the project site either infiltrates at the project site or sheet flows southwest to discharge into Mission Channel. In the post-project condition, stormwater would be intercepted by multiple proposed catch basins and curb inlets and conveyed to one of three infiltration basins where stormwater would infiltrate into the soil. Overflows from the infiltration

[42] California Department of Water Resources. n.d.-c. SGMA Basin Prioritization Dashboard. Website: https://gis.water.ca.gov/app/bp-dashboard/final/ (accessed November 2024).

[43] City of Redlands. 2021. 2020 Integrated Regional Urban Water Management Plan (IRUWMP), Part 2, Chapter 4, Redlands 2020 UWMP. May 27.

basins would be discharged to Mission Channel via a calibrated outlet structure associated with Basin A, similar to existing conditions.

Construction. During construction activities, soil would be exposed and disturbed, drainage patterns would be temporarily altered, and there would be an increased potential for soil erosion and siltation compared to existing conditions. Additionally, during a storm event, soil erosion and siltation could occur at an accelerated rate. As discussed above under Section 3.10(a), and as specified in **RCM HYD-1**, the Applicant would be required to obtain coverage under the Construction General Permit, which requires preparation of a SWPPP. The SWPPP would detail Erosion Control and Sediment Control BMPs to be implemented during construction to minimize erosion and retain sediment on site. The proposed project would also be required to comply with the grading permit requirements of Chapter 70 of the Uniform Building Code as noted in Section 18.212.030 of the City's Municipal Code, which would ensure that construction practices include measures to protect exposed soils such as limiting work to dry seasons, covering stockpiled soils, and use of straw bales and silt fences to minimize off-site sedimentation. In addition, as discussed in Section 3.7, Geology and Soils, the April 2025 letter report that updated the Geotechnical Investigation determined that no channel erosion or undermining from the adjacent Mission Channel would not occur during construction based on the distance of the proposed structures from the channel.

With compliance with the requirements of the Construction General Permit and the Section 18.212.030 of the City's Municipal Code, including implementation of construction BMPs, construction impacts related to substantial soil erosion or the loss of topsoil would be **less than significant**, and no mitigation is required.

Operation. Implementation of the proposed project would increase the amount of impervious surface area on the project site due to the construction of a four story, 55,186-square-foot business hotel, 1,450-square-foot drive-through coffee shop, 3,588-square-foot semi-automated car wash, and associated parking improvements. An increase in impervious surface area increases the rate and volume of runoff during a storm, which can more effectively transport sediments to receiving waters. However, the impervious surface areas on the project site would not be prone to on-site erosion or siltation because there would be no exposed soil. The remaining pervious surfaces on the project site would be landscaped with vegetation that would stabilize the soil and promote infiltration, thereby minimizing on-site erosion and siltation. Furthermore, the proposed project would be required to adhere to **RCM HYD-2**, which requires the preparation of a Final WQMP in compliance with the San Bernardino County MS4 permit and the implementation of Site Design, Source Control, and LID BMPs that minimize stormwater runoff thereby minimizing on-site erosion and siltation. With adherence to **RCM HYD-2**, operational impacts related to on-site or off-site erosion or siltation would be **less than significant,** and no mitigation is required.

Overall, with adherence to **RCMs HYD-1** and **HYD-2**, compliance with Section 18.212.030 of the City's Municipal Code, the proposed project would not result in substantial erosion or siltation on or off site. Impacts would be **less than significant**, and no mitigation is required.

ii Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?

iv Impede or redirect flood flows?

Less Than Significant Impact

Discussion of Effects: According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map No. 06071C8703J (effective August 2, 2016),[44] the northeast portion of the project site is mapped as within Zone X, Area of Minimal Flood Hazard, and is not within a 100-year flood zone. However, the southwestern portion of the project site, adjacent to Mission Channel, is mapped as within Zone AO, Special Flood Hazard Area, which has a 1 percent chance of flooding annually (i.e., 100-year flood zone).

Construction. As discussed above under Section 3.10(a), project construction would comply with the requirements of the Construction General Permit and the City's Municipal Code (**RCM HYD-1**), which require preparation of a SWPPP that would specify Construction BMPs to control and direct on-site surface runoff to ensure that project construction does not increase the rate or amount of surface runoff or impede or redirect flood flows in manner that would result in on-site or off-site flooding. With implementation of a SWPPP and associated Construction BMPs, construction impacts related to a substantial increase in the rate or amount of surface runoff or impeding or redirecting flood flows in a manner that would result in on-site or off-site flooding would be **less than significant**, and no mitigation is required.

Operation. As stated under Section 3.10(c)(i) above, development of the proposed project would increase the total impervious surface area at the project site, which would increase stormwater runoff and could potentially result in flooding. However, as discussed above, the proposed LID BMPs (infiltration basin), would capture and treat stormwater runoff consistent with the requirements of the San Bernardino County MS4 Permit. Compliance with the San Bernardino County MS4 Permit (**RCM HYD-2**) would ensure that operational activities would not result in a substantial increase in the rate or amount of surface runoff or impede or redirect flood flows in a manner that would result in on- or off-site flooding, and impacts would be **less than significant**. No mitigation is required.

Overall, with adherence to **RCMs HYD-1** and **HYD-2**, the proposed project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site or significantly impede or redirect flood flows. Impacts would be **less than significant**, and no mitigation is required.

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

Less Than Significant Impact

Discussion of Effects:

Construction. As discussed above under Section 3.10(a), project construction would comply with the requirements of the Construction General Permit and the City's Municipal Code (**RCM HYD-1**), which require preparation of a SWPPP that would specify Construction BMPs to control and direct on-site surface runoff to ensure that storm water runoff from the construction site does not exceed the capacity of the stormwater drainage system and does not discharge polluted runoff during construction activities.

[44] Federal Emergency Management Agency (FEMA). 2016. Flood Insurance Rate Map No. 06071C8703J. August 2.

With adherence to **RCM HYD-1**, construction impacts related to exceeding the capacity of the storm water drainage system or additional polluted runoff would be **less than significant**, and no mitigation is required.

Operation. As previously discussed, the project site is undeveloped and stormwater at the project site either infiltrates at the project site or sheet flows southwest to discharge into Mission Channel under existing conditions. The proposed project would increase the impervious surface area compared to existing conditions, which would increase stormwater runoff collected on the project site and discharged off-site into the existing storm drainage system and receiving waters. However, as previously discussed, the proposed project would capture and retain the required DCV for the project site and gradually release overflows to Mission Channel such that the 100-year outflows would be less than the 25-year existing event, as required by the San Bernardino County MS4 Permit. Therefore, stormwater runoff would not exceed the capacity of the existing stormwater system pursuant to the requirements of the San Bernardino County MS4 Permit. Additionally, as discussed under Section 3.10(a), the proposed project would implement Operational BMPs to reduce pollutants of concern in stormwater runoff in compliance with the County of San Bernardino MS4 permit, as required by **RCM HYD-2**. With adherence to **RCM HYD-2**, operational impacts related to the creation or contribution of storm water runoff that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff would be **less than significant**, and no mitigation is required.

Overall, with adherence to **RCMs HYD-1** and **HYD-2**, the proposed project would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. Impacts would be **less than significant**, and no mitigation is required.

d. Result in flood hazard, tsunami, or seiche zones, or risk release of pollutants due to project inundation?

Less Than Significant Impact

Discussion of Effects:

Flooding. As discussed under Section 3.10(c)(ii) above, the northeastern portion of the project site is not within a 100-year flood zone; however, the southwestern portion of the projects site, along Mission Channel, is located in an area that has a 1 percent chance of flooding annually (i.e., 100-year flood zone). During construction, BMPs would be implemented to ensure that during a rain event, pollutants would be retained on site and would be prevented from reaching downstream receiving waters in accordance with **RCM HYD-1**. During operation, the proposed project would generally maintain the existing drainage pattern of the project site, and development would include catch basins and inlets with storm filters and an infiltration basin that would ensure that pollutants would be treated and prevented from reaching downstream receiving waters, consistent with the requirements of the San Bernardino County MS4 Permit. Compliance with the San Bernardino County MS4 Permit, as required by **RCM HYD-2**, would ensure the proposed project would not result in the release of pollutants due to flooding during operation.

In addition, according to the California Department of Water Resources Division of Safety of Dams, the project site is not located within a dam inundation area.[45] Therefore, the proposed project would not result in the release of pollutants due to flooding cause by a dam failure.

Tsunami. The project site is approximately 52 miles northeast of the Pacific Ocean, and the Santa Ana Mountains are between the project site and the Pacific Ocean. Based on the distance from the Pacific Ocean and the presence of an intervening mountain range, the project site would not be susceptible to inundation from a tsunami and there is no risk of a release of pollutants from the project site.

Seiches. Seiches are oscillations in enclosed bodies of water (e.g., a bay, lake, or harbor) that are caused by a number of factors, most often wind or seismic activity. Seiches go up and down or oscillate and do not progress forward like standard ocean waves. The nearest sizeable, enclosed bodies of water to the project site are the reservoir associated with Seven Oaks Dam, located approximately 6 miles northeast of the project site, and Lake Perris, located approximately 14 miles south of the project site. Given the distance of large standing bodies of water from the project site, there is no risk of a release of pollutants from the project site due to seiche-related flooding.

With adherence to **RCMs HYD-1** and **HYD-2**, including the development of an infiltration basin and associated on-site stormwater infrastructure at the project site that would treat stormwater and address the volume and rate of stormwater flows, and because the project site is not within a tsunami or seiche zone, implementation of the proposed project would not result in the release of pollutants from a flood, dam inundation, tsunami, or seiche. Impacts would be **less than significant**, and no mitigation is required.

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

Less Than Significant Impact

Discussion of Effects: The project site is within the jurisdiction of the Santa Ana RWQCB. The Santa Ana RWQCB adopted a Water Quality Control Plan (Basin Plan) in January 1995, which was updated in June 2019, that designates beneficial uses for all surface and groundwater within its jurisdiction and establishes the water quality objectives and standards necessary to protect those beneficial uses. The proposed project would comply with the Construction General Permit and the existing San Bernardino County MS4 Permit, as detailed in **RCMS HYD-1** and **HYD-2**, which require preparation of a SWPPP, preparation of a Final WQMP, and implementation of Construction and Operational BMPs to reduce pollutants of concern in storm water runoff. Therefore, the proposed project would not result in water quality impacts that would conflict with the Santa Ana RWQCB Basin Plan. Impacts related to a conflict with or obstruction of the implementation of a water quality control plan would be **less than significant**, and no mitigation is required.

The Sustainable Groundwater Management Act (SGMA) was enacted in September 2014. SGMA requires governments and water agencies located within high- and medium-priority groundwater basins to halt overdraft of the basins. SGMA requires the formation of local Groundwater Sustainability Agencies, which are required to adopt Groundwater Sustainability Plans (GSPs) to manage the sustainability of the

[45] California Department of Water Resources. n.d.-a. Dam Breach Inundation Map Web Publisher. Division of Safety Dams. Website: https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2 (accessed November 2024).

groundwater basins. The project site is located within the Upper Santa Ana Valley Groundwater Basin. The Upper Santa Ana Valley Groundwater Basin is identified by the Department of Water Resources as a very low priority basin;[46] therefore, development of a GSP or an approved GSP alternative is not required.

As discussed previously, no groundwater was encountered to the maximum depth drilled of 51 feet bgs. Due to the depth to groundwater, it is not expected that any storm water that may infiltrate during construction would affect groundwater quality because the groundwater table is deep, and pollutants would be filtered prior to reaching groundwater. In addition, the proposed project would include three infiltration basins to collect and treat storm water before it could reach groundwater. Further, pollutants in storm water are generally removed by soil through absorption as water infiltrates. Therefore, in areas of deep groundwater, there is more absorption potential and, as a result, less potential for pollutants to reach groundwater. Due to the depth to groundwater, it is not expected that any storm water that may infiltrate during construction or operation would affect groundwater quality because there is not a direct path for pollutants to reach groundwater.

Although the proposed project would increase impervious surface area on the project site, which would decrease on-site infiltration, the proposed project would collect and infiltrate the required DCV for the project site in accordance with the requirements of the San Bernardino County MS4 Permit. Therefore, the proposed project would not substantially decrease on-site infiltration and groundwater recharge when compared to existing conditions. Therefore, with adherence to **RCMs HYD-1** and **HYD-2**, the proposed project would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be **less than significant**, and no mitigation is required.

[46] California Department of Water Resources. n.d.-c SGMA Basin Prioritization Dashboard. Website: https://gis.water.ca.gov/app/bp-dashboard/final/ (accessed November 2024).

3.11 LAND USE AND PLANNING

Would the project:

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a.	Physically divide an established community?	☐	☐	☐	☒
b.	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

a. Physically divide an established community?

No Impact

Discussion of Effects: The project site is bounded by Mission Channel along the southwestern site boundary, California Street to the east, and a railroad line to the north. A mix of single- and multi-family residential uses within the City of Loma Linda are located southwest of the project site, across Mission Channel, and commercial uses are located east of California Street. Several rows of orchard trees followed by I-10 are north of the project site, across the railroad line. Commercial/industrial uses exist north of I-10. Implementation of the proposed project would result in the construction of a new four-story hotel, drive-through coffee shop, semi-automatic car wash, and associated landscaping and parking improvements. The proposed uses are consistent with the surrounding land uses, which include commercial and residential areas, and the proposed project can be seen as an extension of the existing surrounding development.

The proposed project would be served by existing public streets, including California Street, and other infrastructure. In addition, the proposed project would not separate the existing neighborhood to the southwest from commercial uses to the north and east as no access currently exists. Therefore, **no impact** would occur.

b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact

Discussion of Effects: The project site is currently zoned General Commercial, within the East Valley Corridor Specific Plan Area (EV/CG). The purpose of the East Valley Corridor Specific Plan is to provide for large undeveloped areas along I-10 to facilitate future industrial, commercial and residential development in an orderly and aesthetic manner, provide a strong job base to support the local economy, and to ensure high-quality development through design guidelines and standards. The intent of the EV/CG zoning district is to create, preserve and enhance areas for businesses which provide a variety of goods and services serving a community or regional market. Car washes are a permitted land use under this zoning

designation, while development of hotels and drive-through restaurants would require approval of a Conditional Use Permit (CUP).

With approval of a CUP, the proposed project would not conflict with any land use plan, policy, or regulation adopted by the City. As detailed throughout this Initial Study, all impacts to the environment resulting from the proposed project are subject to applicable mitigation and local, State and/or federal regulations, which would reduce those impacts to less than significant levels. Therefore, impacts related to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the proposed project (including, but not limited to the General Plan, Specific Plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect are **less than significant**. No mitigation is required.

3.12 MINERAL RESOURCES

Would the project:

		Potentially Significant Impact	Less than Significant 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?	☐	☐	☐	☒
b.	Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

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?

No Impact.

Discussion of Effect: Minerals are any naturally occurring chemical element or compound, or groups of elements and compounds, formed from inorganic processes and organic substances including, but not limited to, coal, peat, and oil-bearing rock, but excluding geothermal resources, natural gas, and petroleum. Rock, sand, gravel, and earth are also considered minerals by the Department of Conservation when extracted by surface mining operations. According to the City's General Plan EIR, the project site is located within Mineral Resource Zone-3 (MRZ-3) where geologic data indicate that mineral resources cannot be determined from available data.[47] Therefore, no mineral resources of value to the region and the residents of the state have been identified on the project site.

In addition, any construction activities, such as grading or soil excavation, would not be at a depth where unknown mineral resources may be inadvertently discovered. Therefore, the development of the proposed project would not result in the loss of available mineral resources. Therefore, development of the proposed project would have **no impact** related to the availability of mineral resources or mineral resource recovery sites.

[47] City of Redlands. 2017b. City of Redlands General Plan 2035 Environmental Impact Report. Website: https://www.cityofredlands.org/post/planning-division-general-plan (accessed November 2024).

3.13 NOISE

Would the project:

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

The following noise analysis describes the potential short-term construction noise and vibration impacts associated with the proposed project, as well as long-term operational noise and vibration impacts. The analysis is based, in part, on the Noise Impact Study[48] (**Appendix I**) prepared by MD Acoustics, LLC and dated February 18, 2025.

Fundamentals of Noise and Vibration

The following provides basic information about noise and vibration and presents some of the terms used within this section.

Frequency and Hertz. A continuous sound is described by its frequency (pitch) and its amplitude (loudness). Frequency relates to the number of pressure oscillations per second. Low-frequency sounds are low in pitch (bass sounding) and high-frequency sounds are high in pitch (squeak). These oscillations per second (cycles) are commonly referred to as Hertz (Hz). The human ear can hear from the bass pitch starting at 20 Hz to the high pitch of 20,000 Hz.

Sound Pressure Levels and Decibels. The amplitude of a sound determines its loudness. The loudness of sound increases or decreases as the amplitude increases or decreases. Sound pressure amplitude is measure in units of micro-Newton per square inch meter (N/m^2), also called micro-Pascal (µPa). One µPa is approximately one hundred billionths (0.00000000001) of normal atmospheric pressure. Sound pressure level (SPL) is used to describe in logarithmic units the ratio of actual sound pressures to a

[48] MD Acoustics, LLC. 2025b. 913 California Street Noise Impact Study, City of Redlands, CA. February 18.

reference pressure squared. These units are called decibels (dB). Exhibit C of the Noise Impact Study (**Appendix I**) illustrates references sound levels for different noise sources.

Addition of Decibels. Because decibels are on a logarithmic scale, sound pressure levels cannot be added or subtracted by simple plus or minus addition. When two sounds or equal SPL are combined, they will produce an SPL 3 dB greater than the original single SPL. In other words, sound energy must be doubled to produce a 3 dB increase. If two sounds differ by approximately 10 dB, the higher sound level is the predominant sound.

Sensitive Receptors. Noise-sensitive land uses include residential (single- and multi-family dwellings, mobile home parks, dormitories, and similar uses); transient lodging (including hotels, motels, and similar uses); hospitals, nursing homes, convalescent hospitals, and other facilities for long-term medical care; public or private educational facilities, libraries, churches, and places of public assembly.

Human Response to Changes in Noise Levels. In general, the healthy human ear is most sensitive to sounds between 1,000 Hz and 5,000 Hz, (A-weighted scale) and it perceives a sound within that range as being more intense than a sound with a higher or lower frequency with the same magnitude. For purposes of this analysis, as well as with most environmental documents, the A-scale weighting is typically reported in terms of A-weighted decibel (dBA). Typically, the human ear can barely perceive a change in noise level of 3 dB. A change in 5 dB is readily perceptible, and a change in 10 dB is perceived as being twice or half as loud. As previously discussed, a doubling of sound energy results in a 3 dB increase in sound, which means that a doubling of sound energy (e.g., doubling the volume of traffic on a highway) would result in a barely perceptible change in sound level.

Noise Descriptors. Noise in our daily environment fluctuates over time. Some noise levels occur in regular patterns, others are random. Some noise levels are constant while others are sporadic. Noise descriptors were created to describe the different time-varying noise levels, as defined below:

- ***A-Weighted Sound Level:*** The sound pressure level in decibels as measured on a sound level meter using the A-weighted filter network. The A-weighting filter de-emphasizes the very low and very high-frequency components of the sound in a manner similar to the response of the human ear. A numerical method of rating human judgment of loudness.

- ***Ambient Noise Level:*** The composite of noise from all sources, near and far. In this context, the ambient noise level constitutes the normal or existing level of environmental noise at a given location.

- ***Community Noise Equivalent Level (CNEL):*** The average equivalent A-weighted sound level during a 24-hour day, obtained after the addition of five (5) decibels to sound levels in the evening from 7:00 to 10:00 PM and ten (10) decibels to sound levels in the night before 7:00 AM and after 10:00 PM.

- ***Decibel (dB):*** A unit for measuring the amplitude of a sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure, which is 20 micro-pascals.

- ***dB(A):*** A-weighted sound level (see definition above).

- ***Equivalent Sound Level (L_{eq}):*** The sound level corresponding to a steady noise level over a given sample period with the same amount of acoustic energy as the actual time-varying noise level. The energy average noise level during the sample period.

- ***Habitable Room:*** Any room meeting the requirements of the Uniform Building Code or other applicable regulations which is intended to be used for sleeping, living, cooking, or dining purposes, excluding such enclosed spaces as closets, pantries, bath or toilet rooms, service rooms, connecting corridors, laundries, unfinished attics, foyers, storage spaces, cellars, utility rooms, and similar spaces.

- ***L(n):*** The A-weighted sound level exceeded during a certain percentage of the sample time. For example, L_{10} is the sound level exceeded 10 percent of the sample time. Similarly, L_{50}, L_{90}, and L_{99}, etc.

- ***Noise:*** Any unwanted sound or sound which is undesirable because it interferes with speech and hearing, or is intense enough to damage hearing, or is otherwise annoying. The State Noise Control Act defines noise as "...excessive undesirable sound...".

- ***Outdoor Living Area:*** Outdoor spaces that are associated with residential land uses typically used for passive recreational activities or other noise-sensitive uses. Such spaces include patio areas, barbecue areas, jacuzzi areas, etc. associated with residential uses; outdoor patient recovery or resting areas associated with hospitals, convalescent hospitals, or rest homes; outdoor areas associated with places of worship which have a significant role in services or other noise-sensitive barbecue areas, jacuzzi areas, etc. associated with residential uses; outdoor patient recovery or resting areas associated with hospitals, convalescent hospitals, or rest homes; outdoor areas associated with places of worship which have a significant role in services or other noise-sensitive activities; and outdoor school facilities routinely used for educational purposes which may be adversely impacted by noise. Outdoor areas usually not included in this definition are: front yard areas, driveways, greenbelts, maintenance areas and storage areas associated with residential land uses; exterior areas at hospitals that are not used for patient activities; outdoor areas associated with places of worship and principally used for short-term social gatherings; and, outdoor areas associated with school facilities that are not typically associated with educational uses prone to adverse noise impacts (for example, school play yard areas).

- ***Percent Noise Levels:*** See L(n).

- ***Sound Level (Noise Level):*** The weighted sound pressure level obtained by use of a sound level meter having a standard frequency filter for attenuating part of the sound spectrum.

- ***Sound Level Meter:*** An instrument, including a microphone, an amplifier, an output meter, and frequency weighting networks for the measurement and determination of noise and sound levels.

- ***Single Event Noise Exposure Level (SENEL):*** The dB(A) level which, if it lasted for one second, would produce the same A-weighted sound energy as the actual event.

Traffic Noise Prediction. Noise levels associated with traffic depends on a variety of factors: volume of traffic; the speed of traffic; auto, medium truck (two-axle), and heavy truck percentage (three-axle and greater); and sound propagation. Higher traffic volume, speeds, and truck percentages equate to a louder volume in noise. A doubling of the average daily traffic (ADT) along a roadway will increase noise levels by approximately 3 dB.

Sound Propagation. As sound propagates from a source it spreads geometrically. Sound from a small, localized source (i.e., a point source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates at a rate of 6 dB per doubling of distance. The movement of vehicles down a roadway makes the source of the sound appear to propagate from a line (i.e., line source) rather than a point source. This line source results in the noise propagating from a roadway in a cylindrical spreading versus a spherical spreading that results from a point source. The sound level attenuates for a line source at a rate of 3 dB per doubling of distance.

As noise propagates from the source, it is affected by the ground and atmosphere. Noise models use hard site (reflective surfaces) and soft site (absorptive surfaces) to help calculate predicted noise levels. Hard site conditions assume no excessive ground absorption between the noise source and the receptor. Soft site conditions such as grass, soft dirt, or landscaping attenuate noise at a rate of 1.5 dB per doubling of distance. When added to the geometric spreading, the excess ground attenuation results in an overall noise attenuation of 4.5 dB per doubling of distance for a line source and 7.5 dB per doubling of distance for a point source.

Research has demonstrated that atmospheric conditions can have a significant effect on noise levels when noise receptors are located 200 feet from a noise source. Wind, temperature, air humidity, and turbulence can further impact how far sound can travel.

Vibration Descriptors. Ground-borne vibrations consist of rapidly fluctuating motions within the ground that have an average motion of zero. The effects of ground-borne vibrations typically only cause a nuisance to people, but at extreme vibration levels, damage to buildings may occur. Although ground-borne vibration can be felt outdoors, it is typically only an annoyance to people indoors where the associated effects of the shaking of a building can be notable. Ground-borne noise is an effect of ground-borne vibration and only exists indoors since it is produced from noise radiated from the motion of the walls and floors of a room and may also consist of the rattling of windows or dishes on shelves.

Several different methods are used to quantify vibration amplitude, as discussed below:

- ***PPV*** – Known as the peak particle velocity (PPV) which is the maximum instantaneous peak in vibration velocity, typically given in inches per second.
- ***RMS*** – Known as root mean squared (RMS) can be used to denote vibration amplitude
- ***VdB*** – A commonly used abbreviation to describe the vibration level (VdB) for a vibration source.

Vibration Perception. Typically, developed areas are continuously affected by vibration velocities of 50 VdB or lower. These continuous vibrations are not noticeable to humans, whose threshold of perception is around 65 VdB. Outdoor sources that may produce perceptible vibrations are usually caused by construction equipment, steel-wheeled trains, and traffic on rough roads, while smooth roads rarely produce perceptible ground-borne noise or vibration. To counter the effects of ground-borne vibration, the Federal Transit Administration (FTA) has published guidance relative to vibration impacts. According to the FTA, fragile buildings can be exposed to ground-borne vibration levels of 0.3 inches per second without experiencing structural damage.

As vibration waves propagate from a source, the vibration energy decreases in a logarithmic nature and the vibration levels typically decrease by 6 VdB per doubling of the distance from the vibration source. As

stated above, this drop-off rate can vary greatly depending on the soil but has been shown to be effective enough for screening purposes to identify potential vibration impacts that may need to be studied through actual field tests.

Regulatory Framework

Noise Regulations

City of Redlands General Plan. The City of Redlands General Plan, Noise Element[49] has established policies to meet City noise-related goals as well as a noise land use compatibility matrix shown in **Table 3.13.A: Noise/Land Use Compatibility Matrix and Interpretation** to assess the compatibility of proposed land uses and interior and exterior noise standards for specific land uses shown in **Table 3.13.B: Interior and Exterior Noise Standards**. As shown in **Table 3.13.B**, hotels have an interior noise standard of 45 dBA CNEL and an exterior noise standard 65 dBA CNEL. Restaurant and commercial uses have an interior noise standard of 55 dBA CNEL.

The following provides the applicable City policies, as detailed in the City's General Plan, Noise Element:

Policy 9.0e: Use the criteria specified in GP Table 7-10 (**Table 3.13.A**) to assess the compatibility of proposed land uses with the projected noise environment, and apply the noise standards in GP Table 7-11 (**Table 3.13.B**), which prescribe interior and exterior noise standards in relation to specific land uses. Do not approve projects that would not comply with the standards in GP Table 7-11 (**Table 3.13.B**).

These tables are the primary tools which allow the City to ensure noise-integrated planning for compatibility between land uses and outdoor noise.

Policy 9.0f: Require a noise impact evaluation based on noise measurements at the site for all projects in Noise Referral Zones (B, C, or D) as shown on GP Table 7-10 (**Table 3.13.A**) and on GP Figure 7-9 or as determined from tables in the Appendix, as part of the project review process. Should measurements indicate that unacceptable noise levels will be created or experienced, require mitigation measures based on a detailed technical study prepared by a qualified acoustical engineer (i.e., a Registered Professional Engineer in the State of California with a minimum of three years experience in acoustics).

[49] City of Redlands. 2017a. City of Redlands General Plan 2035. Website: https://www.cityofredlands.org/post/planning-division-general-plan (accessed November 2024).

Table 3.13.A: Noise/Land Use Compatibility Matrix and Interpretation

Land Use Categories		Community Noise Equivalent Level (CNEL)							
Categories	**Uses**	**<**	**60**	**65**	**70**	**75**	**80**	**85**	**>**
RESIDENTIAL	Single Family, Duplex Multiple Family	A	C	C	C	D	D	D	
RESIDENTIAL	Mobile Homes	A	C	C	C	D	D	D	
COMMERCIAL Regional, District	Hotel, Motel, Transient Lodging	A	A	B	B	C	C	D	
COMMERCIAL Regional, Village District, Special	Commercial Retail, Bank, Restaurant, Movie Theater	A	A	A	A	B	B	C	
COMMERCIAL INDUSTRIAL INSTITUTIONAL	Office Building, Research & Dev., Professional Offices, City Office Building	A	A	A	B	B	C	D	
COMMERCIAL Recreation INSTITUTIONAL Civic Center	Amphitheater, Concert Hall, Auditorium, Meeting Hall	B	B	C	C	D	D	D	
COMMERCIAL Recreation	Childrens Amusement Park, Miniature Golf Course, Go-cart Track, Equestrian Center, Sports Club	A	A	A	A	B	B	B	
COMMERCIAL General, Special INDUSTRIAL, INSTITUTIONAL	Automobile Service Station, Auto Dealership, Manufacturing, Warehousing, Wholesale, Utilities	A	A	A	A	B	B	B	
INSTITUTIONAL General	Hospital, Church, Library, Schools Classroom	A	A	B	C	C	D	D	
OPEN SPACE	Parks	A	A	A	B	C	D	D	
OPEN SPACE	Golf Course, Cemeteries, Nature Centers, Wildlife Reserves, Wildlife Habitat	A	A	A	A	B	C	C	
AGRICULTURE	Agriculture	A	A	A	A	A	A	A	

Zone A CLEARLY COMPATIBLE	Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.
ZONE B NORMALLY COMPATIBLE	New construction or development should be undertaken only after detailed analysis of the noise reduction requirements are made and needed noise insulation features in the design are determined. Conventional construction, with closed windows and fresh air supply systems or air conditioning, will normally suffice.
ZONE C NORMALLY INCOMPATIBLE	New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of noise reduction requirements must be made and needed noise insulation features included in the design.
ZONE D CLEARLY INCOMPATIBLE	New construction or development should generally not be undertaken.

Source: City of Redlands General Plan Noise Element, Table 7-10 (City of Redlands, December 2017).

Table 3.13.B: Interior and Exterior Noise Standards

Land Use Categories	Community Noise Equivalent Level (CNEL) Energy Average	
	Interior[1]	Exterior[2]
Residential		
Single Family, Duplex, Multiple Family	45[3]	60
Mobile Home	---	60[4]
Commercial, Industrial, Institutional		
Hotel, Motel, Transit Lodging	45	65[3]
Commercial Retail, Bank, Restaurant	50	---
Office Building, Research & Development, Professional Offices, City Office Building	50	---
Amphitheater, Concert Hall, Auditorium, Meeting Hall	45	---
Gymnasium (Multipurpose)	50	---
Sports Club	55	---
Manufacturing, Warehousing, Wholesale, Utilities	60	---
Movie Theaters	45	---
Institutional		
Hospitals, Schools classrooms	45	60
Open Space		
Parks	---	60

Source: City of Redlands General Plan Noise Element, Table 7-11 (City of Redlands, December 2017).

1 Indoor environment excludes bathrooms, toilets, closest, corridors.

2 Outdoor environment limited to private yard of single family as measured at property line; multifamily private patio or balcony that is served by means of exist from inside; mobile home park; hospital patio; park picnic area; school playground; hotel and recreational area.

3 Noise level requirement with open window if they are used to meet natural ventilation requirements.

4 Exterior noise levels should be such that interior noise levels will not exceed 45 CNEL.

5 Expect those areas affected by aircraft noise.

CNEL = Community Noise Equivalent Level

Policy 9.0h: Require construction of barriers to mitigate sound emissions where necessary or where feasible, and encourage use of walls and berms to protect residential or other noise sensitive land uses that are adjacent to major roads, commercial, or industrial areas.

Policy 9.0k: Ensure the effective enforcement of City, State and federal noise levels by all appropriate City departments.

Policy 9.0s: Require mitigation to ensure that indoor noise levels for residential living spaces not exceed 45 dB L_{dn}/CNEL due to the combined effect of all exterior noise sources.

The Uniform Building Code (specifically, the California Administrative Code, Title 24, Part 6, Division T25, Chapter 1, Subchapter 1, Article 4, Sections T25 28) requires that "Interior community noise levels (CNEL/L_{dn}) with windows closed, attributable to exterior sources shall not exceed an annual CNEL or L_{dn} of 45 dB in any habitable room." The code requires that this standard be applied to all new hotels, motels, apartment houses and dwellings other than detached single family dwellings.

Policy 9-s sets the maximum acceptable interior noise level at 45 CNEL. The Noise Referral Zones (65 CNEL) delineate areas within which tests to ensure compliance are to be required for new structures.

Policy 9.0t: Require proposed commercial projects near existing residential land use to demonstrate compliance with the Community Noise Ordinance prior to approval of the project.

Policy 9.0v: Consider the following impacts as possibly "significant":

- An increase in exposure of four or more dB if the resulting noise level would exceed that described as clearly compatible for the affected land use, as established in GP Table 7-10 (**Table 3.13.A**) and GP Table 7-11 (**Table 3.13.B**);
- Any increase of 6 dB or more, due to the potential for adverse community response.

Policy 9.0w: Limit hours for all construction or demolition work where site-related noise is audible beyond the site boundary.

Policy 9.0x: Work with Caltrans to establish sound walls along freeways where appropriate.

Policy 9.0y: Minimize impacts of loud trucks by requiring that maximum noise levels due to single events be controlled to 50 dB in bedrooms and 55 dB in other habitable spaces.

City of Redlands Municipal Code. Section 8.06.070.A of the City's Municipal Code[50] outlines the exterior noise standards for stationary noise sources and are shown below in **Table 3.13.C: Maximum Permissible Exterior Sound Levels by Receiving Land Use.**

Section 8.06.090(F) of the City's Municipal Code prohibits the operation or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of 6:00 p.m. and 7:00 a.m., including Saturdays, or at any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real property line, except for emergency work by public service utilities, the city or another governmental entity. All mobile or stationary internal combustion engine powered equipment or machinery shall be equipped with exhaust and air intake silencers in proper working order, or suitable to meet the standards set forth herein.

Section 8.06.090(F) of the City's Municipal Code prohibits the operation or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of 6:00 p.m. and 7:00 a.m., including Saturdays, or at any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real property line, except for emergency work by public service utilities, the city or another governmental entity. All mobile or stationary internal combustion engine powered equipment or machinery is required to be equipped with exhaust and air intake silencers in proper working order, or suitable to meet the standards set forth in the City's Municipal Code.

[50] City of Redlands. 2024c. Municipal Code. July. Website: https://codelibrary.amlegal.com/codes/redlandsca/latest/redlands_ca/0-0-0-1. Accessed March 2025.

Table 3.13.C: Maximum Permissible Exterior Sound Levels by Receiving Land Use

Receiving Land Use Category	Time Period	Noise Level (dBA)					
		Noise Standard	L_{50}[1]	L_{25}[2]	L_8[3]	L_2[4]	L_{max}[5]
Single-family residential districts	10:00 p.m. to 7:00 a.m.	50	50	55	60	65	70
	7:00 a.m. to 10:00 p.m.	60	60	65	70	75	80
Multifamily residential districts; Public space; institutional	10:00 p.m. to 7:00 a.m.	50	50	55	60	65	70
	7:00 a.m. to 10:00 p.m.	60	60	65	70	75	80
Commercial	10:00 p.m. to 7:00 a.m.	60	60	65	70	75	80
	7:00 a.m. to 10:00 p.m.	65	65	70	75	80	85
Industrial	Any time	75	--	--	--	--	--

Source: City of Redlands. Municipal Code, Section 8.06.070 (2024).

Note: Per the City of Redlands Municipal Code: *If the measured ambient level exceeds the allowable noise exposure standard within any of the first 4 noise limit categories above, the allowable noise exposure standard shall be adjusted in 5 dBA increments in each category as appropriate to encompass or reflect said ambient noise level. In the event the ambient noise level exceeds the 5th noise limit category, the maximum allowable noise level under this category shall be increased to reflect the maximum ambient noise level. The ambient noise shall be measured at the same location along the property line with the alleged offending noise source inoperative. If the alleged offending noise source cannot be shut down, the ambient noise shall be estimated by performing a measurement in the same general area of the source but at a sufficient distance that the noise from the source is at least 10 dBA below the ambient in order that only the ambient level be measured. If the difference between the ambient and the noise source is 5 to 10 dBA, then the level of the ambient itself can be reasonably determined by subtracting a one decibel correction to account for the contribution of the source. In the event the alleged offensive noise contains a steady, audible tone such as a whine, screech, hum, or is a repetitive noise such as hammering or riveting, or contains music or speech conveying informational content, the standard limits shall be reduced by 5 dBA*.

[1] The noise standard for a cumulative period of more than 30 minutes in any hour.
[2] The noise standard plus 5 dBA for a cumulative period of more than 15 minutes in any hour.
[3] The noise standard plus 10 dBA for a cumulative period of more than 5 minutes in any hour.
[4] The noise standard plus 15 dBA for a cumulative period of more than 1 minute in any hour.
[5] The noise plus 20 dBA or the maximum measured ambient level for any period of time.

dBA = A-weighted decibels
L_{eq} = Equivalent continuous sound level

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

Vibration Regulations

City of Redlands Municipal Code. Section 8.06.090(G) of the City's Municipal Code prohibits the operation or permitting the operation of any device that creates a vibration which is above the vibration perception threshold of an individual at or beyond the property boundary of the source if on private property or at 150 feet from the source if on a public space or public right-of-way.

Caltrans. The California Department of Transportation (Caltrans) Transportation and Construction Vibration Guidance Manual[51] also has applicable vibration damage thresholds based on the type of structure and its condition provided in **Table 3.13.D: Guideline Vibration Damage Potential Threshold Criteria.**

Table 3.13.D: Guideline Vibration Damage Potential Threshold Criteria

Structure and Condition	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

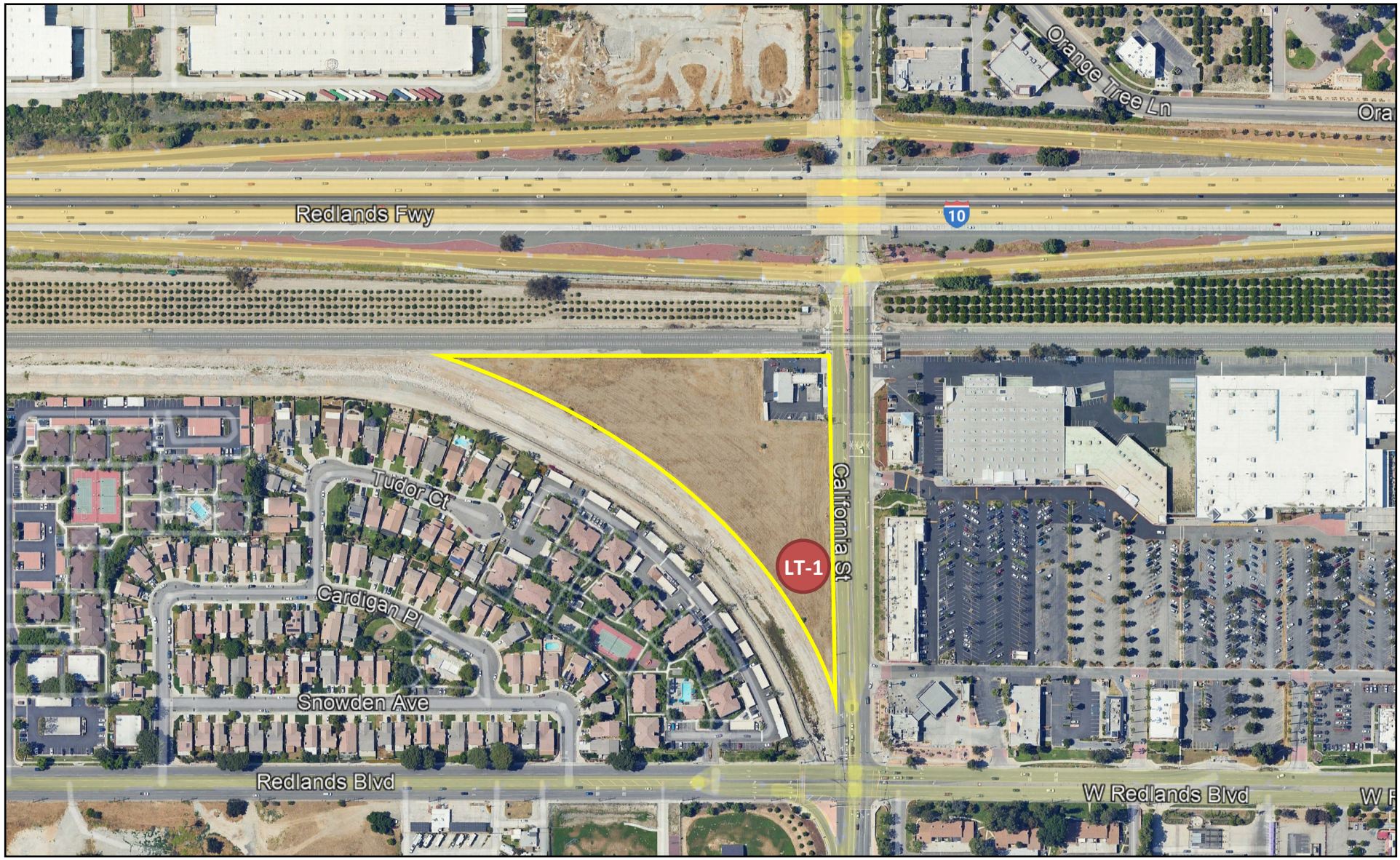
Source: Caltrans Transportation and Construction Vibration Guidance Manual, Table 19 (Caltrans 2020).
Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.
Caltrans = California Department of Transportation
in/sec = inch/inches per second
PPV = peak particle velocity

Existing Conditions

Long-Term Noise Measurement.

One long-term 24-hour noise measurement was conducted on Tuesday, January 23, 2024, at the project site to document the existing noise environment. The measurement included the 1-hour L_{eq}, minimum measured sound level (L_{min}), maximum instantaneous noise level (L_{max}), and other statistical data (e.g., L_2, L_8). The long-term noise level measurement results are provided in **Appendix I.** The ambient noise levels on the project site range between 52 and 66 dBA L_{eq}, with an average of 64 dBA L_{eq} for daytime hours and 58 dBA L_{eq} for nighttime hours. The overall CNEL level was 66 dBA. **Figure 3-1: Noise Monitoring Location** shows the location of the long-term noise measurement. The noise measurement field sheets are provided in **Appendix I**. The field data indicate that I-10 is the dominant noise source.

[51] California Department of Transportation (Caltrans). 2020. *Transportation and Construction Vibration Guidance Manual*. April. Website: https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf (assessed March 2025).



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Project Site

LT-1 Measurement Location

FIGURE 3-1

913 California Street Mixed-Use Project

Noise Monitoring Location

SOURCE: Google Earth (2024)

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a. Result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less than Significant Impact

Discussion of Effects:

Short-Term (Construction) Noise. The degree of construction noise during construction activities may vary for different areas of the project site and depends on the specific construction activity. Project construction would occur in five phases, including site preparation, grading, building construction, paving, and architectural coating. **Table 3.13.E: Typical Construction Equipment Noise Levels** provides the typical construction equipment noise levels at a distance of 50 feet. Construction noise associated with each phase of the proposed project was calculated at nearby sensitive receptors using methodology provided in the Federal Highway Administration (FHWA) Construction Noise Model along with several key construction parameters including distance to each sensitive receptor, equipment usage factor, and baseline parameters for the project site. Construction equipment typically moves back and forth across the site, and it is an industry-standard to use the acoustical center of the site to model average construction noise levels.

Table 3.13.E: Typical Construction Equipment Noise Levels

Equipment Description	Maximum Noise Level (L_{max}) at 50 ft[1]
Compactors (Ground)	80
Front End Loader	80
Backhoe	80
Tractor	84
Scraper	85
Grader	85
Pavers	85
Dump Truck	84
Concrete Mixer Truck	85
Concrete Pump Truck	82
Crane	85
Pumps	77
Generator	82
Compressors	80
Concrete Saws	90
Vibratory Pile Driver	95

Source: FHWA Highway Construction Noise Handbook, Table 9.1 (FHWA 2006).
Note: The noise levels reported in this table are rounded to the nearest whole number.
[1] The maximum noise levels were developed based on Specification 721.560 from the CA/T program to be consistent with the City of Boston, Massachusetts, Noise Code for the "Big Dig" project.
CA/T = Central Artery/Tunnel
FHWA = Federal Highway Administration
ft = foot/feet
L_{max} = maximum instantaneous noise level

Table 3.13.F: Construction Noise Level by Phase provides the calculated construction noise levels at the closest residences and commercial use for each construction phase. The construction noise calculation output worksheet is provided in **Appendix I**. As shown in **Table 3.13.F**, project construction noise would range between 57 to 69 dBA L_{eq} at the residential property to the southwest and 56 to 68 dBA L_{eq} at the commercial property to the east.

Table 3.13.F: Construction Noise Level by Phase

Construction Phase	Noise Level at Receptors (dBA L_{eq})	
	Southwestern Residences	East Commercial
Site Preparation	67	67
Grading	67	66
Building Construction	66	66
Paving	69	68
Architectural Coating	57	56

Source: 913 California Street Noise Impact Study, City of Redlands, CA (MD Acoustics, LLC, February 18, 2025).
dBA = A-weighted decibel(s)
L_{eq} = equivalent continuous sound level

Although noise generated from project construction activities would temporarily increase ambient noise levels, construction noise would stop once project construction is completed. In addition, compliance with the City's Municipal Code, as detailed in **RCM NOI-1**, would ensure that construction noise impacts would be minimized to the greatest extent feasible. **RCM NOI-1** would limit construction hours to between the hours of 7:00 a.m. and 8:00 p.m. Monday through Saturday provided all motorized equipment is equipped with functioning mufflers pursuant to Sections 8.06.090F (Noise Disturbances Prohibited) and 8.06.120 (Exemptions) of the City's Municipal Code.

RCM NOI-1

Construction Noise. Compliance with Sections 8.06.090F (Noise Disturbances Prohibited) and Chapter 8.06.120(G) (Exemptions) of the City of Redlands (City) Municipal Code. Construction activities, including operating or causing the operation of any tools or equipment used in site preparation, construction, drilling, repair, alteration, grading, paving, and/or architectural coating shall be restricted to the hours of 7:00 a.m. to 8:00 p.m. Mondays through Saturdays, and are prohibited at any time on Sundays and holidays unless permission is given by the City and noise levels remain below the City's noise level standards.

As required by Section 8.06.090F, all mobile or stationary internal combustion engine-powered equipment or machinery shall be equipped with exhaust and air intake silencers in proper working order and shall be maintained so that vehicles and their loads are secured from rattling and banging.

With compliance with **RCM NOI-1**, construction noise impacts would be **less than significant**. No mitigation measure is required.

Long-Term (Operational) Traffic Noise. The following discusses potential long-term impacts associated with both off-site and on-site traffic noise.

Off-Site Traffic Noise. The FHWA Traffic Noise Prediction Model (FHWA-RD-77-108) was used to model traffic noise levels along roadways affected by project-related traffic. The FHWA model calculates the predicted traffic noise level through a series of adjustments to the Reference Energy Mean Emission Level (REMEL) along with specific roadway parameters and vehicle distribution that are provided in **Appendix I**.

Traffic noise contours were generated for the existing and existing plus project conditions to determine the proposed project's long-term traffic noise impacts on the surrounding land uses. The traffic noise contours describe noise levels at a set distance from the roadway centerline and represent a worst-case scenario without shielding such as structures, sound walls, topography, and/or other sound-attenuating features. The noise contours are also used for comparative purposes and to determine the change in project-related traffic noise along roadways in the vicinity of the project site.

The potential off-site noise impacts from project-related traffic were calculated at a distance of 50 feet from affected roadway segments. The existing traffic noise levels at 50 feet both with and without project conditions were compared and the project-related traffic noise increase was calculated. **Table 3.13.G**: **Change in Existing Noise Levels as a Result of Project Generated Traffic** shows that the addition of project-related traffic on California Street and Redlands Boulevard would result in negligible increases in ambient noise levels. Therefore, project-related traffic noise on off-site noise-sensitive uses would be **less than significant**, and no mitigation measure is required.

Table 3.13.G: Change in Existing Noise Levels as a Result of Project Generated Traffic

Roadway Segment	Modeled Noise Levels (dBA CNEL) at 50 feet from the Centerline			
	Existing without Project	Existing with Project	Change in Noise Level	Increase of 3 dBA or More?[1]
California Street (north of Redlands Boulevard)	71.6	71.8	0.2	No
Redlands Boulevard (east of California Street)	75.7	75.7	0.0	No

Source: 913 California Street Noise Impact Study, City of Redlands, CA (MD Acoustics, LLC, February 18, 2025).
[1] Typical CEQA significance threshold.
CEQA = California Environmental Quality Act dBA = A-weighted decibel(s)
CNEL = Community Noise Equivalent Level

On-Site Traffic Noise. Based on the long-term noise measurement shown in **Table 3.13.E,** the existing noise level on the project site is 66 dBA CNEL. However, noise levels at the proposed hotel site were set to 70 dBA CNEL based on future noise contours projected for 2035 in the City's General Plan Noise Element[52] because the proposed hotel would be located closer to the railroad and freeway. This noise level is considered normally compatible for the proposed hotel based on the City's Noise/Land Use Compatibility Matrix shown in **Table 3.13.A**.

The exterior noise level at sensitive receptors within the hotel area (i.e., the pool area) is expected to be shielded from the highway and railroad noise by the architectural layout design of the proposed hotel building. The proposed hotel building would provide acoustical shielding from the railroad and freeway and would obstruct the line-of-sight to both the patio and pool area. It is anticipated that the four-story hotel would provide a minimum of 10 dBA of noise reduction to the areas which would lower the exterior noise level from 70 dBA CNEL to approximately 60 dBA CNEL. This noise level would

[52] City of Redlands. 2017a. City of Redlands General Plan 2035. Website: https://www.cityofredlands.org/post/planning-division-general-plan (accessed November 2024).

comply with the City's exterior noise standard of 65 dBA CNEL for outdoor use areas associated with the hotel and would be confirmed by a final acoustic report, which would be required during the City's design review process.

The proposed hotel would require a building shell design to achieve an overall sound transmission class 30 or higher (70 dBA - 45 dBA = 25 dBA + 5 dBA for construction defects) to reduce interior noise levels to the City's interior noise standard of 45 dBA CNEL or below. Once architectural details are available, the final acoustic report would be required to demonstrate that interior noise levels would be reduced to the City's interior noise standard of 45 dBA CNEL or below.

Long-Term (Operational) Stationary Noise. The SoundPLAN modeling software was used to predict noise from proposed project operations at nearby sensitive receptors. The SoundPLAN software utilizes algorithms (based on the inverse square law) to calculate noise level projections. It allows the user to input specific noise sources, spectral content, sound barriers, building placement, topography, and sensitive receptor locations. It also calculates noise level increases due to the reflection of noise from hard surfaces.

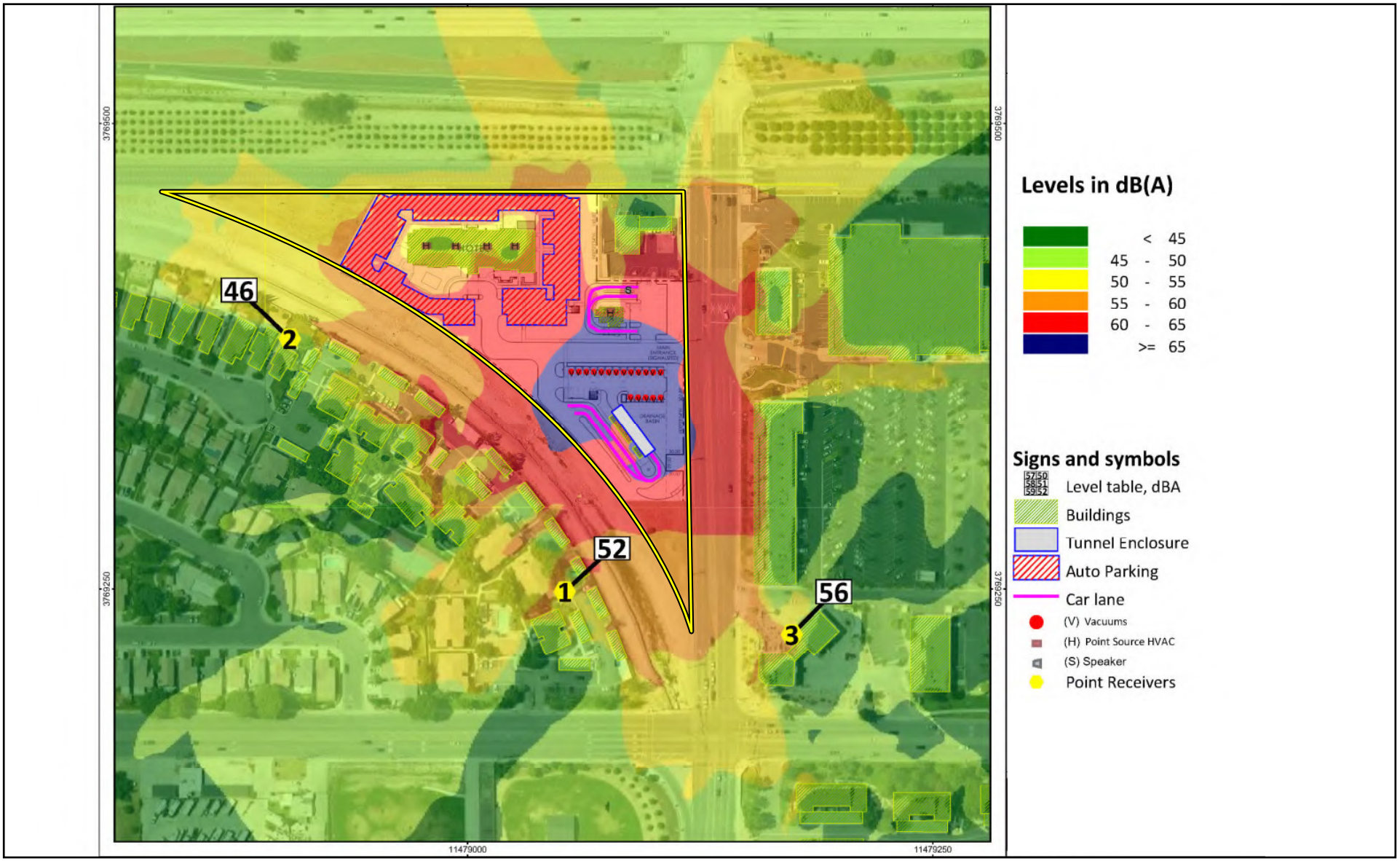
Table 3.13.H: SoundPLAN Modeling Assumptions lists the measured and reference sound levels used to model the various on-site stationary noise sources associated with proposed project operations such as dryer blowers, the vacuum turbine, idling cars, parking movements, drive-through speakers, and heating, ventilation, and air conditioning (HVAC). The proposed car wash tunnel would be approximately 130 feet in length and would include a 10-foot by 16-foot entrance/exit opening. The car wash blowers (14 MacNeil blowers) were modeled at 10 to 12 feet high as point sources. The blowers would be located approximately 5 to 10 feet inside the exit of the tunnel. The car wash vacuum bays, the vacuum turbine inside an enclosure, drive-through speaker, and HVAC were modeled as point sources. Idling cars at the drive-through were modeled as continuous line sources. Finally, car parking lots were modeled as 0.3 movements per space per hour. SoundPLAN noise modeling input and results are provided in **Appendix I**.

Table 3.13.H: SoundPLAN Modeling Assumptions

Noise Source	Source Type	Reference Sound Level (dBA L_{eq})	Reference Distance (ft)
Drive-Thru Speaker	Point Source	65	5
Idling Car	Point Source	67	5
HVAC	Point Source	67	3
14 MacNeil Dryers	Point Source (inside tunnel)	97	5
Vacuum Bay	Point Source	71	2
Vacuum Turbine	Point Source (inside enclosure)	43	3

Source: 913 California Street Noise Impact Study, City of Redlands, CA (MD Acoustics, LLC, February 18, 2025).
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibels
ft = foot/feet
HVAC = heating, ventilation, and air conditioning
L_{eq} = equivalent continuous sound level

The closest receptors surrounding the project site include multifamily residences to the southwest, represented by Receptors R1 and R2, and commercial to the east represented by R3. **Figure 3-2**: **SoundPLAN Operational Noise Modeling Results** depicts the locations of these receptors. **Table 3.13.I: Daytime Operational Noise Levels** summarizes the results of the SoundPLAN modeling, which show proposed project operational noise levels ranging between 46 and 56 dBA L_{eq}. When factoring the existing ambient noise level of 64 dBA L_{eq}, the combined noise level would range between 64 and 65 dBA L_{eq} and project-related noise increase would reach up to 1 dBA.



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Project Site

0 150 300

FEET

SOURCE: MD Acoustics

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FIGURE 3-2

913 California Street Mixed-Use Project

SoundPLAN Operational Noise Modeling Results

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Table 3.13.I: Daytime Operational Noise Levels

Receptor	Land Use	Noise Level (dBA L_{eq})				Noise Level Change (dBA)
		Existing Ambient Noise Level	Project Noise Level	Combined Noise Level	Daytime Noise Standard[1]	
R-1	Multifamily	64	52	64	65	0
R-2	Multifamily	64	46	64	65	0
R-3	Commercial	64	56	65	65	1

Source: 913 California Street Noise Impact Study, City of Redlands, CA (MD Acoustics, LLC, February 18, 2025).

[1] In accordance with Section 8.06.070(C) of the City Municipal Code, the allowable standard shall be adjusted in 5 dB increments if the ambient level exceeds the limit.

dBA = A-weighted decibels

L_{eq} = Equivalent continuous sound level

As shown in **Table 3.13.I**, the combined noise level would not exceed the City's daytime noise standard of 65 dBA L_{eq} for both residential and commercial uses and the project-related noise increase of up to 1 dBA would not be substantial because the noise increase would not be perceptible to the human ear in an outdoor environment. Therefore, noise generated from proposed project operations would be **less than significant**, and no mitigation measure is required.

b. Result in generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant Impact

Discussion of Effects:

Short-Term Construction Vibration. Construction activities can generate vibration that may be felt by adjacent land uses. However, the construction of the proposed project would not require the use of construction equipment which are known to generate substantial vibration levels, such as pile drivers. The primary vibration source during construction is anticipated to be from a bulldozer. **Table 3.13.J: Vibration Source Levels for Construction Equipment** shows that a large bulldozer has a reference vibration level of 0.089 inches per second PPV at a distance of 25 feet.[53] The following equation is used to calculate vibration propagation through average soil conditions and distance is as follows:

$$PPV_{equipment} = PPV_{ref} (100/D_{rec})^n$$

Where: PPV_{ref} = reference PPV at 100ft.

D_{rec} = distance from equipment to receiver in ft.

n = 1.1 (the value related to the attenuation rate through ground)

[53] Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment Manual*. September. Website: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf (accessed March 2025).

Table 3.13.J: Vibration Source Levels for Construction Equipment

Equipment		Reference PPV/LV at 25 ft	
		PPV (in/sec)	Approximate L_V (VdB)[1]
Pile Driver (impact)	upper range	1.518	112
	typical	0.644	104
Pile Driver (sonic)	upper range	0.734	105
	typical	0.170	93
Clam shovel drop (slurry wall)		0.202	94
Hydromill (slurry wall)	in soil	0.008	66
	in rock	0.017	75
Vibratory Roller		0.210	94
Hoe Ram		0.089	87
Large Bulldozer		0.089	87
Caisson Drilling		0.089	87
Loaded Trucks		0.076	86
Jackhammer		0.035	79
Small Bulldozer		0.003	58

Source: Transit Noise and Vibration Impact Assessment Manual (FTA 2018).
[1] RMS vibration velocity in decibels (VdB) is 1 µin/sec.
µin/sec = microinches per second
ft = foot/feet
FTA = Federal Transit Administration
in/sec = inches per second
LV = vibration velocity in decibels
PPV = peak particle velocity
RMS = root-mean-square
VdB = vibration velocity decibels

The nearest existing buildings are the residential building approximately 175 feet west of the project site. At this distance, a large bulldozer would generate a vibration level of 0.010 PPV (in inches per second [in/sec]). This vibration level would not be perceptible and would not have the potential to result in annoyance. Additionally, no structures are located within 15 feet of construction activities and the project proposes to use standard construction equipment (i.e. no blasting or pile driving), thus, construction vibration would not result in damage to surrounding buildings. Therefore, vibration generated from project construction activities would be **less than significant**, and no mitigation is required.

Long-Term (Operational) Vibration. The proposed project would not generate vibration. In addition, vibration levels generated from project-related traffic on roadways within the vicinity of the project site, including California Street and Redlands Boulevard, would not be unusual for on-road vehicles because the rubber tires and suspension systems of on-road vehicles provide vibration isolation. Therefore, vibration impacts from project-related operations would be **less than significant**, and no mitigation measure is required.

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

No Impact

Discussion of Effect: The nearest airport to the project site is the San Bernardino International Airport, which is located approximately 1.7 miles northwest of the project site. The project site is outside of the airport's 65 dBA CNEL noise contour based on the Airport Layout Plan Narrative Report for San Bernardino

International Airport.[54] In addition, there are no private airstrips located within the vicinity of the project site. Therefore, the proposed project would not expose people residing or working in the project site and surrounding area to excessive noise levels generated from nearby airport operations. **No impact** would occur**.**

[54] San Bernardino International Airport Authority. 2010. Airport Layout Plan Narrative Report for San Bernardino International Airport. November.

3.14 POPULATION AND HOUSING

Would the project:

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

a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact

Discussion of Effects: The project site is currently undeveloped and does not contain any residential units. The proposed project would construct a new hotel, drive-through coffee shop, and semi-automatic car wash, and associated landscaping and parking improvements. The United States Census Bureau estimated the City's population to be approximately 74,279 residents in July 2024. [55]

According to the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Demographics Draft Growth Projections, the city is anticipated to experience a 10 percent increase in population from approximately 72,800 people in 2019 to approximately 80,400 people in 2050. This accounts for an increase of approximately 7,600 people in the city. [56]

Construction of the proposed project is not anticipated to induce substantial population growth as construction workers are anticipated to come from the city and surrounding area. In addition, operation of the hotel would likely induce temporary population growth as visitors pass through or visit the Redlands area. It is assumed that the majority of visitors would be staying short-term and for business purposes, and therefore would not impact the population of Redlands.

[55] United States Census Bureau. 2024. QuickFacts Redlands City, California. 2024. Website: https://www.census.gov/quickfacts/fact/table/redlandscitycalifornia/PST045223 (accessed May 2025).

[56] Southern California Association of Governments (SCAG). 2023. Draft Connect SoCal 2024 growth projections. September 21. Website: https://www.google.com/search?q=scag+growth+projection+data+exc+el&oq=scag+growth+projection+data+exc+el&gs_lcrp=EgRlZGdlKgYIABBFGDkyBggAEEUYOTIKCAEQABiiBBiJBTIKCAIQABiABBiiBDIHCAMQABjvBTIKCAQQABiiBBiJBTIHCAUQABjvBdIBCDQ3NzZqMGoxqAIAsAIA&sourceid=chrome&ie=UTF-8 (accessed January 2025).

Operation of the new hotel, drive-through coffee shop, and semi-automatic car wash would create up to 31 new jobs. However, these jobs would not incite substantial population growth as the surrounding local cities and residential areas would supply a sufficient workforce to operate these new facilities. All new jobs are anticipated to be filled by local the local workforce, and therefore, would not incite substantial population growth in the vicinity of the project site or within the city.

Any increase in population at the project site would be negligible and consistent with planned population growth and housing development in the city, as anticipated by the General Plan and regional planning documents, but the proposed facilities are not expected to cause substantial indirect population growth. Since population generated by the proposed project would not exceed local and regional population growth projections, any population growth generated by the proposed project would not be substantial. Impacts would be **less than significant,** and no mitigation is required.

b. Displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact

Discussion of Effects: As discussed above, the project site is currently undeveloped and does not contain any residential units. Therefore, the proposed project would not displace existing housing. In addition, implementation of the proposed project would not cause substantial population growth, necessitating the construction of additional housing elsewhere in the city. **No impact** would occur.

3.15 PUBLIC SERVICES

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☒	☐
iv. Parks?	☐	☐	☒	☐
v. Other public facilities?	☐	☐	☒	☐

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

Less Than Significant Impact

Discussion of Effects:

i. Fire Protection

Fire protection services in the city and at the project site are provided by the Redlands Fire Department (RFD). In its review of new development plans, the RFD would evaluate the proposed project plans in their ability to provide proper fire protection to the development. Additionally, the proposed project would be required to pay service and development fees to the RFD in accordance with Chapter 3.60.000, Public Facilities Fees, of the City's Municipal Code. Such fees would be used to fund capital costs associated with acquiring land for new fire stations, constructing new fire stations, purchasing fire equipment, and providing for additional staff as needed and as identified by the City.

The RFD aims to meet the National Fire Protection Association's standards of a four-minute response time for first responders 90 percent of the time, but as of 2015, RFD's 90 percent response time was approximately nine minutes.[57]

The RFD has determined that it would need to increase the number of fire stations in order to meet increased future citywide service demands. In the City's Strategic Plan for Fiscal Year 2022/2023 through 2027/2028, the construction of additional fire stations to maintain critical response times and provision of additional emergency response personnel were established as strategic objectives to enhance public health and safety within the city.[58] As such, the City has begun identifying locations for additional fire stations and developing a fire staffing plan. Any construction of future fire protection facilities would require project-level environmental review and site-specific mitigation as appropriate in order to ensure significant environmental impacts are avoided or mitigated.

The project site is located adjacent to an established residential neighborhood in the City of Loma Linda, and is within a Local Responsibility Area (LRA) Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ).[59] The nearest fire stations to the project site are Redlands Fire Station 264, located at 1270 West Park Avenue, approximately 1.5 miles southeast of the project site, and Redlands Fire Station 263, located at 10 West Pennsylvania Avenue, approximately 2.6 miles northeast of the project site.[60] Average travel times between Redlands Fire Station 263 and Redlands Fire Station 264 and the project site is approximately seven minutes. Through compliance with California Vehicle Code 21806(A)(1), which requires all vehicles to yield to emergency vehicles, travel time between the fire stations and the project site is expected to be reduced. Additionally, the City maintains mutual aid agreements with surrounding cities (i.e., cities of Yucaipa and Loma Linda), as well as with the County of San Bernardino and the United States Forest Service, which allow for the services of nearby fire departments to assist the City during major emergencies.

Project design features incorporated into the structural design and layout would keep service demand increases to a minimum. For example, the proposed project would be constructed in accordance with the current California Building Code (CBC), which requires all on-site structures to incorporate construction techniques and materials such as roofs, eaves, exterior walls, vents, appendages, windows, and doors resistant to and/or to perform at high levels against ignition during the exposure to fires. As detailed further in Section 3.20, Wildfire, below, the proposed project would be required to comply with RFD standard requirements including inspection requirements and general requirements, as well as project-specific requirements. The project-specific requirements include an underground piping plan for an automatic fire sprinkler system or fire hydrant system, an architectural plan including sprinklers and fire walls, a chemical classification and hazardous materials compliance plan, a fire alarm system, and all other city, State, regional and federal requirements that are applicable. Access to the project site would be provided via a main signalized entrance on California Street, and the internal streets on the project site

[57] City of Redlands. 2017b. City of Redlands General Plan 2035 Environmental Impact Report. Website: https://www.cityofredlands.org/post/planning-division-general-plan (accessed November 2024).

[58] City of Redlands. 2022a. City of Redlands Strategic Plan FY 22-23 through FY 27-28. Website: https://www.cityofredlands.org/sites/main/files/file-attachments/redlandsstrategicplan_final.pdf?1651172526 (accessed November 2024).

[59] CAL FIRE. 2025. Fire Hazard Severity Zones. March 24. Website: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones (accessed March 2025).

[60] City of Redlands. n.d.-b. Fire Station Locations. Website: https://www.cityofredlands.org/profile/fire-department (accessed November 2024).

would be developed to City and Fire Code Standards to allow emergency vehicles ease of access and maneuverability. Finally, fire hydrants would be placed within the project site, at specific distances required by fire service and City requirements.

Based on the project site's location in a LRA Non-VHFHSZ in proximity to existing RFD facilities capable of responding to emergencies at the project site within the City's stated response time objective of seven minutes 90 percent of the time, development of the proposed project would not cause fire staffing, facilities, or equipment to operate at a deficient level of service (LOS). The proposed project itself would not require the construction of new or physically altered fire protection facilities, the construction of which could result in an environmental impact. Additionally, because the proposed project would not induce substantial population growth and would be required to pay development impact fees in accordance of Chapter 3.60.000 of the City's Municipal Code to fund future fire facilities and services, which would be subject to project- and site-specific environmental review, impacts associated with the need to expand fire protection services and facilities in order to maintain acceptable levels of service would be **less than significant**. No mitigation is required.

ii. Police Protection

Police protection services in the city and at the project site are provided by the Redlands Police Department (RPD). As previously mentioned, development of the proposed project is unlikely to incite substantial population growth within the City. In its review of new development plans, the RPD evaluates project plans on its ability to provide proper police protection to the development. Additionally, the Applicant would be required to pay service and development fees to the RPD. Such fees would be used to fund capital costs associated with acquiring land for new police stations, constructing new police stations, purchasing crime-fighting equipment for new police stations, and providing for additional staff as needed and as identified by the City. Any construction of future police facilities would require project-level environmental review and site-specific mitigation as appropriate in order to ensure significant environmental impacts are avoided or mitigated.

The RPD does not base service standards on an industry standard; instead, the City aims for a response time of 4.5 minutes. The RPD has determined that it would need to increase the number of police stations in order to meet increased future citywide service demands. The nearest police station to the project site is Redlands Police Department located at 1270 West Park Avenue, approximately 1.5 miles southeast of the project site. Average travel time between the nearest police station and the project site is approximately seven minutes. Through compliance with California Vehicle Code 21806(A)(1), which requires all vehicles to yield to emergency vehicles, travel time between the nearest police station and the project site is expected to be reduced below 4.5 minutes. Additionally, the City maintains mutual aid agreements with surrounding cities (i.e., cities of Yucaipa and Loma Linda), as well as with the County of San Bernardino, which allow for the services of nearby law enforcement agencies to assist the City during major emergencies.

Based on the project site's location in proximity to existing RPD facilities capable of responding to emergencies at the project site within the City's stated response time objective of 4.5 minutes, development of the proposed project would not cause law enforcement staffing, facilities, or equipment to operate at a deficient LOS. The proposed project itself would not require the construction of new or physically altered law enforcement protection facilities, the construction of which could result in an environmental impact. Additionally, because the proposed project would be required to pay development impact fees in accordance of Chapter 3.60.000 of the City's Municipal Code to fund future law

enforcement facilities and services, which would be subject to project- and site-specific environmental review, impacts associated with the need to expand law enforcement protection services and facilities in order to maintain acceptable levels of service would be **less than significant**. No mitigation is required.

iii. Schools

The project site is located within the Redlands Unified School District (RUSD). RUSD currently operates 16 elementary schools (serving kindergarten through fifth grade); four middle schools (servings grades sixth through eighth); and three high schools (serving grades ninth through twelfth). The nearest school to the project site is Mission Elementary School, located at 10568 California Street, approximately 0.1 mile south.

As previously mentioned, the proposed project would not result in substantial population growth. In addition, future employees of the proposed project are anticipated to come from the local workforce. As such, it is anticipated that any children of future employees would already attend school in the RUSD. Therefore, any additional students attending RUSD schools as a result of the proposed project is unlikely. In addition, the RUSD has accounted for the generation of its student population through its facilities planning activities based on the City's buildout; as such, RUSD does not anticipate further growth in its boundary that would exceed planned development associated with the City's buildout. The proposed project itself would not require the construction of new or physically altered educational facilities, the construction of which could result in an environmental impact. Additionally, because the proposed project would be required to pay development impact fees in accordance with Chapter 3.60.000 of the City's Municipal Code to fund future educational services provided by RUSD, which would be subject to project- and site-specific environmental review, impacts associated with the need to expand educational services and facilities in order to maintain acceptable levels of service would be **less than significant**. No mitigation is required.

iv. Parks/Recreational Facilities

The City owns and operates 21 parks totaling approximately 424.2 acres of land. The nearest park to the project site is Heritage Park, located at 1885 Orange Avenue approximately 1 mile southeast of the project site. Heritage Park is an 18.4-acre natural park featuring an outdoor amphitheater, schoolhouse, a small farm, vineyards, and an orchard.[61] The City's General Plan establishes a park standard of 5.0 acres of parkland for every 1,000 residents. As of 2024, the City had an estimated population of 74,279 residents.[62] Pursuant to the City's park standard, the city would require 361.64 acres of parkland.[63] As such, under current conditions, the city has a surplus of 62.55 acres of parkland.

The proposed project would not result in substantial population growth in the city. The proposed project also includes on-site recreational amenities for hotel guests, including an outdoor gathering space, pool, and landscaped areas. As such, it is anticipated that impacts to surrounding parks and recreational facilities would not be substantial as any temporary visitors staying at the hotel are expected to use on-site amenities. Nevertheless, some hotel guests may use other public recreational facilities. In addition, the proposed project would be required to adhere to Chapter 3.32.000, Open Space and Park Fees, of the

61 City of Redlands. 2023. Heritage Park. Available at: https://storymaps.arcgis.com/stories/f49d713dfc694039a8203d08071ea5d0 (accessed November 2024).

62 United States Census Bureau. 2024. QuickFacts Redlands City, California. Website: https://www.census.gov/quickfacts/fact/table/redlandscitycalifornia/PST045223 (accessed November 2024).

63 72,329 / 1,000 = 72.329 * 5 = 361.64.

City's Municipal Code which requires the payment of an Open Space and Park Development Impact Fee for commercial developments, including hotels. With payment of these in-lieu fees, as required by Chapter 3.32.000 of the City's Municipal Code, impacts to parks with implementation of the proposed project would be **less than significant,** and no mitigation is required.

v. Other Public Facilities

The proposed project would not result in substantial population growth at the project site or within the city. As such, the demand on public services. including those listed above and others such as libraries and City administrative facilities. would not increase substantially. The proposed project would be required to adhere to Chapter 3.60.000, Public Facilities Fees, of the City's Municipal Code which requires the payment of Public Facilities Fees for commercial development. Therefore, impacts to other public facilities with implementation of the proposed project would be **less than significant**, and no mitigation is required.

3.16 RECREATION

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

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

Less Than Significant Impact

Discussion of Effects: The proposed project includes the construction of a four-story hotel, drive-through coffee shop, and semi-automated car wash. As discussed in Section 3.14, Population and Housing, the proposed project is not expected to contribute to population growth directly or indirectly, as all employment generated by the proposed project would be satisfied by the existing local workforce. As the proposed project includes three commercial uses, it is not expected to result in a substantial increase in demand on existing parks in the surrounding area. In addition, the proposed hotel would provide recreational amenities to temporary guests.

The proposed project would also be required to adhere to Chapter 3.32.000, Open Space and Park Fees, of the City's Municipal Code which requires the payment of an Open Space and Park Development Impact Fee for commercial developments, including hotels. Twenty-five percent of this fee would be deposited into the City's Open Space Fund to be used solely for the purposed of acquisition, improvement, preservation, and expansion of open space areas within the city.[64] As such, impacts associated with the deterioration of surrounding recreational facilities would be **less than significant**, and no mitigation is required.

b. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

Less Than Significant Impact

Discussion of Effects: As discussed above, the proposed hotel would include on-site amenities such as an outdoor gathering area and pool. The construction of these recreational facilities is considered part of the

[64] City of Redlands. 2024. Annual Report of Development Impact Fees. December 17.

proposed project, and any potential and adverse effects associated with implementation of the proposed project's recreational facilities have been considered throughout the analysis of this IS/MND. As discussed elsewhere in this document, all of the proposed project's significant impacts can be mitigated to less than significant levels. As discussed above under Section 3.16(a), the proposed project would not cause or accelerate the substantial physical deterioration of existing recreational facilities, so it would not require the construction or expansion of off-site recreational facilities. Therefore, impacts would be **less than significant**, and no mitigation is required.

3.17 TRANSPORTATION

Would the project:	Potentially Significant Impact	Less than Significant 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?	☐	☐	☒	☐
b. Conflict or be inconsistent with *CEQA Guidelines* Section 15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

The following transportation analysis is based on the Traffic Impact Analysis (TIA)[65] (**Appendix J**) prepared by Ganddini and dated February 27, 2025, and the Vehicle Miles Traveled (VMT) Analysis Memorandum[66] (**Appendix K**) prepared by LSA Associates, Inc. and dated February 4, 2025.

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

Less Than Significant Impact

Discussion of Effects: The proposed project would develop the project site with a 55,186-square-foot, 90-room business hotel, a 1,450-square-foot drive-through coffee shop, and a 3,588-square-foot semi-automatic car wash. Vehicular access to the project site would be provided via one full access driveway and one restricted right turn in/out driveway from California Street. The proposed project would also include the installation of a signalized intersection at California Street and the project's main driveway.

The proposed project trip generation forecast is based on average rates obtained from the Institute of Transportation Engineers Trip Generation Manual (11th Edition, 2021) for Land Use Code 312 (Business Hotel), Land Use Code 937 (Coffee Donut Shop with Drive-through Window) and Land Use Code 948 (Automated Car Wash). The proposed project is forecast to generate approximately 1,619 new daily trips, including 124 new trips during the AM peak hour and 130 new trips during the PM peak hour. In accordance with City requirements, the transportation study area was determined in consultation with the City's engineering staff and consists of classified roadway intersections to which the proposed project

[65] Ganddini. 2025. 913 California Street Mixed-Use Center Traffic Impact Analysis. February 27.

[66] LSA Associates, Inc. (LSA). 2025. *913 California Street Project Vehicle Miles Traveled Analysis Memorandum*. February 4.

is forecast to contribute at least 50 peak hour trips. Based on the proposed project's trip generation and distribution forecasts, the TIA analyzed the proposed project's impact on the following City intersections:

- California Street (north-south [NS]) at I-10 Westbound Ramps (east-west [EW])
- California Street (NS) at I-10 Eastbound Ramps (EW)
- California Street (NS) at Project Main Driveway (EW)
- California Street (NS) at Redlands Boulevard (EW)
- California Street (NS) at Project South Driveway (EW)

Under existing conditions, the above City intersections operate at overall acceptable LOS C or better during both peak hours (the intersections with the project's main and south driveways do not currently exist). Implementation of the proposed project would not degrade the LOS at the above intersections below the current LOS grade; therefore, implementation of the proposed project is forecast to result in no substantial transportation effects at these intersections. The proposed project would also be required to comply with the City's standard development review process measures, including the following: site-adjacent roadways would be constructed and repaired at their ultimate half-section width, including landscaping and parkway improvements in conjunction with development, or as otherwise required by the City; all on-site and off-site roadway design, signing/striping, and traffic control improvements relating to the proposed project shall be submitted to the City for review and approval; the final grading, landscaping and street improvement plans shall demonstrate that applicable sight distance requirements are met; the proposed project shall comply with municipal parking requirements which will be reviewed and approved by the City; final project plans would demonstrate adequate emergency vehicle access and circulation to the satisfaction of the City's Public Works and Fire Departments; and the proposed project would include a construction worksite traffic control plan that complies with applicable engineering standards outlined in the *California Manual of Uniform Traffic Control Devices*.

Within the vicinity of the project site, paved sidewalks are present on the east side of California Street and the west side of California Street between the gas station located north of the project site and I-10. Sidewalks are also present on both sides of Redlands Boulevard west of California Street and on the north side of Redlands Boulevard east of California Street. The proposed project would construct sidewalks along the project site frontages and would enhance sidewalk connectivity along California Street. As such, the proposed project would increase the performance and safety of the existing pedestrian facilities in the vicinity of the project site. Although the City's General Plan Circulation Element identifies both California Street and Redlands Boulevard as planned bike routes, there are currently no existing bicycle facilities along these streets adjacent to the project site. Implementation of the proposed project would not conflict with any plans and policies related to the construction of bike facilities or decrease the performance or safety of any existing or proposed bicycle facilities in the vicinity of the project site. Omnitrans is the public transit agency serving the San Bernardino Valley, providing safe, reliable, affordable, friendly, and environmentally responsible transportation. Omnitrans Route 8 serves the project site along Redlands Boulevard. Although the project site is adjacent to Metrolink's Arrow Route commuter rail line, there are no existing or proposed stops within the vicinity of the project site. However, none of these transit facilities would be affected with implementation of the proposed project. As such, the proposed project is not anticipated to decrease the performance or safety of any existing or proposed public transit facilities.

The City's General Plan and Section 1A.60 Principle Six has established the minimum acceptable LOS as C or better for roadway segments and peak hour intersection operations, and both existing and existing plus proposed project scenarios resulted in the applicable roadways remaining at LOS C. Based on the information provided in the TIA and summarized above, the proposed project would comply with the City's Measure "U" Principles of Managed Development, which states that the following must remain true with development of a project: (1) levels of traffic service throughout the City shall be maintained; (2) collector and local street standards shall be maintained; (3) circulation patterns shall protect residential neighborhoods from increased traffic congestions; and (4) designated scenic highways within the City shall be maintained.

Because all of the study intersections would operate at acceptable LOS C or maintain the existing overall LOS with implementation the proposed project, the proposed project would not result in adverse impacts related to transportation, and would be consistent with all applicable programs, plans, ordinances, and policies addressing the circulation system, including Measure "U". In addition, pursuant to the requirements of the City, Development Impact Fees (DIFs) will be required to be paid by the Applicant. The DIF applied to the proposed project would pay the proposed project's "fair share" portion of the costs identified for public facilities, including transportation-related improvements. Therefore, impacts would be **less than significant**, and no mitigation is required.

b. Conflict or be inconsistent with *CEQA Guidelines Section 15064.3, subdivision (b)*?

Less Than Significant Impact

Discussion of Effects: As part of the *State CEQA Guidelines* 2019 updates, Section 15064.3 was added, which codifies that project-related transportation impacts are typically best measured by evaluating the project's VMT. Specifically, subdivision (b) focuses on specific criteria related to transportation analysis and is divided into four subdivisions: (1) land use projects, (2) transportation projects, (3) qualitative analysis, and (4) methodology. Subdivision (b)(1) provides guidance on determining the significance of transportation impacts of land use projects using VMT; projects located within 0.5 mile of high-quality transit should be considered to have a less than significant impact. Subdivision (b)(2) addresses VMT associated with transportation projects and states that projects that reduce VMT, such as pedestrian, bicycle, and transit projects, should be presumed to have a less than significant impact. Subdivision (b)(3) acknowledges that Lead Agencies may not be able to quantitatively estimate VMT for every project type; in these cases, a qualitative analysis may be used. Subdivision (b)(4) stipulates that Lead Agencies have the discretion to formulate a methodology that would appropriately analyze a project's VMT. Therefore, the *City of Redlands CEQA Assessment VMT Analysis Guidelines*, adopted July 2020 (VMT Guidelines) was used to determine the proposed project's VMT impacts. The City's VMT Guidelines provide several screening criteria for projects within the City. Projects that cannot be screened out by the screening criteria should conduct further VMT analysis to identify project-related VMT impacts.

The City's VMT Guidelines provide three screening criteria for land use projects. These three criteria were reviewed to examine if the proposed project could be screened out from a detailed VMT analysis. Following is a brief description of project screening criteria that is applicable to the proposed project and whether the proposed project would be eligible to be screened out:

- **Transit Priority Area Screening:** Based on the City's VMT Guidelines, projects located within a transit priority area (TPA) may be presumed to have a less than significant impact if they also meet the floor area ratio (FAR), parking, and sustainable communities' strategy requirement criteria

recommended in the City's VMT Guidelines. The project site's location was examined using the San Bernardino County Transportation Authority (SBCTA) VMT Screening Tool to determine whether the project would be located within a TPA. Based on the SBCTA VMT Screening Tool, the project site is not located within a TPA. Therefore, the proposed project cannot be screened out using this criterion.

- **Low VMT Area Screening:** Based on the City's VMT Guidelines, residential and office projects, as well as certain employment-related and mixed-use projects located within a low-VMT-generating area may be presumed to have a less than significant impact, absent substantial evidence to the contrary. The proposed project does not consist of residential or office uses. However, since the City's VMT Guidelines also allows the application of this criterion for mixed-use or employment generating projects, the project site's location was examined using the SBCTA VMT Screening Tool to determine whether the project would be located within a low VMT area. Based on the SBCTA VMT Screening Tool evaluation, the project site is not located in a low VMT generating area and cannot be screened out using this criterion.
- **Project Type Screening:** Based on the City's VMT Guidelines, local serving retail projects with store areas less than 50,000 square feet may be presumed to have a less than significant impact absent substantial evidence to the contrary. Additionally, based on the City's VMT Guidelines, certain local-serving types of projects, including local serving gas station, K-12 schools, parks, day care centers, banks, non-destination hotels, and community institutions are presumed to have a less than significant VMT impact.

  As previously noted, the proposed project includes the construction of a 1,450-square-foot drive-through coffee shop, a 3,588-square-foot semi-automatic car wash, and a 55,186-square-foot, 90-room business hotel. As such, both the coffee shop and the car-wash component of the proposed project would have a store area less than the 50,000-square-foot threshold and would serve local patrons. Therefore, these components of the proposed project would be considered small local-serving retail uses and are eligible to be screened out using this criterion.

  Similarly, given the project site's location adjacent to multiple existing and recently developed employment-based land uses (business parks, industrial parks, and the ESRI campus), and because the proposed hotel would not offer any conference space or resort-style amenities, the business hotel component of the proposed project is not anticipated to function as a destination hotel. This is because the proposed hotel is not anticipated to attract new visitor trips to the City on its own. Instead, the proposed hotel would provide visitors to the City with a new hotel option close to these employment areas that do not currently have adequate hotel rooms available for such business patrons. This would result in a potential reduction in visitor VMT once the proposed project is constructed as it would allow visitors to stay closer to their destinations. Therefore, as a non-destination hotel, this component of the proposed project is also eligible to be screened out using this criterion.

As the proposed project meets the Project Type Screening criteria, the proposed project would not result in any significant VMT impacts. In addition, according to the City's VMT Guidelines, a significant impact occurs when a project conflicts with adopted plans, policies, or programs regarding active transportation or public transit facilities, or otherwise decreases the performance or safety of such facilities. As previously discussed in Section 3.17(a) above, implementation of the proposed project would not conflict with existing or proposed bicycle, pedestrian, and public transit facilities. Therefore, it can be considered to

conform to all adopted policies, plans, or programs concerning these facilities and would not have a significant impact.

Based on the City's VMT Guidelines, the proposed project's land use components are presumed to have a less than significant impact and therefore are eligible to be screened out. As such, the entire project is anticipated to have a **less than significant** VMT impact and therefore, is eligible to be screened out from further analysis. Impacts would be **less than significant**, and no mitigation is required.

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

Less Than Significant Impact

Discussion of Effects: Vehicular access for the project site is proposed via one full access driveway and one restricted right-turn in/out driveway from California Street. The main driveway for the project site would include a signalized intersection on California Street. As previously mentioned, roadway frontage improvements in and around the project site would be designed and constructed to satisfy all City requirements for street widths, corner radii, and intersection control, as well as incorporate design standards tailored specifically to site access requirements.

All final site plans would be subject to review and approval by the City's Public Works and Fire Departments prior to issuance of building permits, and adherence to applicable requirements would ensure the proposed development would not include any sharp curves, dangerous driveway intersections, or visual obstructions for drivers negotiating roadway curves. Therefore, impacts related to a substantial increase in hazards due to a design feature or incompatible use would be **less than significant**. No mitigation is required.

d. Result in inadequate emergency access?

Less Than Significant Impact

Discussion of Effects: The Applicant would be required to design, construct, and maintain structures, roadways, and facilities that would provide for adequate emergency access and evacuation. The proposed project would be required to implement a construction worksite traffic control plan that complies with applicable engineering standards outlined in the *California Manual of Uniform Traffic Control Devices*, ensuring that construction activities which may temporarily restrict vehicular traffic would be required to implement adequate and appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures.

As previously discussed, vehicular access to the project site would be provided via one full access driveway and one restricted right-turn in/out driveway from California Street. Both of the driveways would also act as fire access roads and would be designed to adequately accommodate fire trucks and apparatuses. As previously mentioned, final site plans would be subject to review and approval by the City's Fire and Police Departments to ensure adequate emergency vehicle access to and within the project site prior the issuance of building permits. Adherence to the emergency access measures required by the City would ensure impacts related to inadequate emergency access would be **less than significant**. No mitigation is required.

3.18 TRIBAL CULTURAL RESOURCES

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

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

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

Less Than Significant Impact with Mitigation Incorporated

Discussion of Effect: Chapter 532, Statutes of 2014 (i.e., Assembly Bill [AB] 52), requires Lead Agencies evaluate a project's potential to impact "tribal cultural resources." Such resources include "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register of Historical Resources or included

in a local register of historical resources." AB 52 also gives Lead Agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a "tribal cultural resource."

Per AB 52 (specifically Public Resources Code [PRC] 21080.3.1), Native American consultation is required upon request by a California Native American tribe that has previously requested that the City provide it with notice of such projects. Pursuant to provisions of AB 52, the City contacted the following Native American Tribes, which have previously requested to be notified of projects within the City, via email and certified mail on November 25, 2024.

- Agua Caliente Band of Cahuilla Indians
- Gabrieleño Band of Mission Indians - Kizh Nation
- Morongo Band of Mission Indians
- Yuhaaviatam of San Manuel Nation
- Soboba Band of Luiseño Indians
- Torres Martinez Desert Cahuilla Indians

The Agua Caliente Band of Cahuilla Indians, the Gabrieleño Band of Mission Indians - Kizh Nation, the Morongo Band of Mission Indians and the Yuhaaviatam of San Manuel Nation responded, requesting further consultation. The Torres Martinez Desert Cahuilla Indians and Soboba Band of Luiseño Indians did not respond to the notice.

The City met with the Agua Caliente Band of Cahuilla Indians virtually on February 12, 2025. During this meeting, the tribe requested to be included in the mitigation measure being drafted in consultation with the other consulting tribes, which included active tribal monitoring of the project site during ground disturbing activities. Mitigation measures were shared with the tribe by email on April 25, 2025, and on April 30, 2025, consultation was closed by a letter from the tribe stating their agreement with the proposed mitigation measures.

Consultation with the Gabrieleno Band of Mission Indians – Kizh Nation was conducted via email due to scheduling constraints with the tribe. The City and the tribe agreed to consult by email on February 5, 2025. On February 13, 2025, the tribe provided information and proposed mitigation measures, which included provisions for active tribal monitoring for their tribe alone. In response to the tribe's email, on February 19, 2025, the City informed the tribe of ongoing consultation with other tribes and noted that the tribe's proposed mitigation would likely need to be revised. Emails from the tribe on February 19 and March 5, 2025, again requested mitigation that would not include participation by other consulting tribes. The City proposed draft mitigation measures that would allow the consulting tribes the ability to actively monitor ground disturbing activities on March 25, 2025, which included as much of the proposed mitigation proposed by the consulting tribes as possible. The Gabrieleno Band of Mission Indians – Kizh Nation emailed on May 1, 2025, to again state their objection to the inclusion of other consulting tribes within the mitigation. In subsequent emails, no new information was exchanged and no agreement on the mitigation was reached. On May 21, 2025, the City closed consultation with tribe.

A virtual meeting was held with the Morongo Band of Mission Indians on February 18, 2025. In this meeting, the tribe provided information and requested specific mitigation measures, which included provisions for active tribal monitoring of ground disturbance. A draft of the tribe's proposed mitigation measures was provided to the City by email on February 18, 2025. On April 25, 2025, the City provided revised mitigation measures that would allow the consulting tribes the ability to actively monitor ground

disturbing activities. On April 30, the tribe agreed to the mitigation measures proposed by email.

On February 5, 2025, the City virtually met with the Yuhaaviatam of San Manuel Nation. During this meeting, the tribe requested additional information about the proposed project including geotechnical reports, cultural resources report and grading plans. Following the completion of the Cultural Resources Report, this information was provided to the tribe on March 13, 2025, via email. Draft mitigation measures were emailed to the City by the tribe on March 25, 2025. On April 25, 2025, the City provided revised mitigation measures that would allow the consulting tribes the ability to actively monitor ground disturbing activities. On May 5, 2025, both parties agreed to the proposed mitigation.

Based on tribal consultation and the potential for the proposed project to inadvertently discover or unearth previously undocumented Native American tribal cultural resources during ground-disturbing activities, **MMs TCR-1 through TCR-8** are prescribed.

MM TCR-1 **Native American Treatment Agreement.** Prior to the issuance of grading permits, the Applicant shall enter into a Tribal Monitoring Agreement with the Consulting Tribes for the project. The Tribal Monitor(s) shall be approved by all consulting tribes, including the Gabrieleño Band of Mission Indians – Kizh Nation, the Morongo Band of Mission Indians, Yuhaaviatam of San Manuel Nation, and Agua Caliente Band of Cahuilla Indians, and be on-site during all ground-disturbing activities (including, but not limited to, clearing, grubbing, tree and bush removal, grading, trenching, fence post placement and removal, construction excavation, excavation for all utility and irrigation lines, and landscaping phases of any kind). The Tribal Monitor(s) shall have the authority to temporarily divert, redirect, or halt the ground-disturbing activities to allow identification, evaluation, and potential recovery of cultural resources and/or tribal cultural resources. A copy of the executed monitoring agreement(s) shall be submitted to the Director of the Development Services Department of the City of Redlands, or their designee, prior to the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

MM TCR-2 **Retention of Archaeologist.** Prior to any ground-disturbing activities (including, but not limited to, clearing, grubbing, tree and bush removal, grading, trenching, fence post replacement and removal, construction excavation, excavation for all utility and irrigation lines, and landscaping phases of any kind), and prior to the issuance of grading permits, the Applicant shall retain a qualified archaeologist who meets the U.S. Secretary of the Interior Standards (SOI). The archaeologist shall be present during all ground-disturbing activities to identify any known or suspected archaeological and/or cultural resources. The archaeologist shall conduct a Cultural Resource Sensitivity Training, in conjunction with the Tribe[s] Tribal Historic Preservation Officer (THPO), and/or designated Tribal Representative. The training session will focus on the archaeological and tribal cultural resources that may be encountered

during ground-disturbing activities as well as the procedures to be followed in such an event.

MM TCR-3 **Cultural Resource Management Plan.** Prior to any ground-disturbing activities, the project archaeologist shall develop a Cultural Resource Management Plan (CRMP) and/or Archaeological Monitoring and Treatment Plan (AMTP) to address the details, timing, and responsibilities of all archaeological and cultural resource activities that occur on the project site. This Plan shall be written in consultation with the consulting Tribes and shall include the following: approved Mitigation Measures (MM)/Conditions of Approval (COA), contact information for all pertinent parties, parties' responsibilities, procedures for each MM or COA, and an overview of the project schedule.

MM TCR-4 **Pre-Grade Meeting.** The retained qualified archeologist and Monitoring Tribes representative shall attend the pre-grade meeting with the grading contractors to explain and coordinate the requirements of the Cultural Resource Management Plan.

MM TCR-5 **On-site Monitoring.** During all ground-disturbing activities the qualified archaeologist and the Tribal Monitor(s) shall be on-site full-time. The frequency of inspections shall depend on the rate of excavation, the materials excavated, and any discoveries of Tribal Cultural Resources as defined in California Public Resources Code Section 21074. The Tribal Monitor(s) shall complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Consulting Tribes. The monitoring logs shall identify and describe any discovered tribal cultural resources, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of the monitoring logs shall be provided to the Applicant/City upon written request to the Monitoring Tribes. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Consulting Tribes from a designated point of contact for the Applicant/City that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the monitoring Tribes to the Applicant/City that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact tribal cultural resources.

MM TCR-6 **Inadvertent Discovery of Tribal Cultural Resources (Non-Funerary/Non-Ceremonial).** In the event that previously unidentified tribal cultural

resources are discovered during construction, the qualified archaeologist and the Tribal Monitor(s) shall have the authority to temporarily divert and/or temporarily halt ground-disturbance activities in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored ground-disturbing activities can proceed.

If a potentially significant tribal cultural resource(s) is discovered, work shall stop within a 60-foot perimeter of the discovery and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. All work shall be diverted away from the vicinity of the find(s), so that the find(s) can be evaluated by the qualified archaeologist and Tribal Monitor(s). The archaeologist shall notify the City and Consulting Tribes of said discovery. The qualified archaeologist, in consultation with the City, the Consulting Tribes, and the Tribal Monitor(s), shall determine the significance of the discovered resource. A recommendation for the treatment and disposition of the tribal cultural resource shall be made by the qualified archaeologist in consultation with the Consulting Tribes and the Tribal Monitor(s) and be submitted to the City for review and approval. Below are the possible treatments and dispositions of significant cultural resources in order of CEQA preference:

A. Full avoidance.

B. If avoidance is not feasible, preservation in place.

C. If preservation in place is not feasible, all items shall be reburied in an area away from any future impacts and reside in a permanent conservation easement or Deed Restriction.

D. If all other options are proven to be infeasible, data recovery through excavation and then curation in a Curation Facility that meets the Federal Curation Standards (36 CFR 79)

If the tribal cultural resource is determined by the Consulting Tribes to be associated with the Kizh Nation, the Kizh Nation shall recover and retain the tribal cultural resource in the form and/or manner the Kizh Nation deems appropriate, in the Kizh Nation's sole discretion, and for any purpose the Kizh Nation deems appropriate, including for educational, cultural and/or historic purposes.

MM TCR-7 **Inadvertent Discovery of Human Remains and Associated Funerary or Ceremonial Objects.** Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Associated Funerary objects, also called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. If Native

American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and associated grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). The following specific conditions shall be imposed to protect Native American human remains and/or cremations and associated funerary or ceremonial objects:

A. Any discovery of human remains/associated burial goods shall be kept confidential to prevent further disturbance.

B. No photographs are to be taken except by the coroner, with written approval by the Consulting Tribes.

C. Should human remains and/or cremations be encountered on the surface or during any and all ground-disturbing activities (i.e., clearing, grubbing, tree and bush removal, grading, trenching, fence post placement and removal, construction excavation, excavation for all water supply, electrical, and irrigation lines, and landscaping phases of any kind), work in the immediate vicinity of the discovery shall immediately stop within a 100-foot perimeter of the discovery. The area shall be protected by the establishment of an Environmentally Sensitive Area (ESA) with a marked boundary. Project personnel/observers shall be restricted from entry into the ESA. The County Coroner shall be contacted within 24 hours of discovery. The County Coroner has 48 hours to make his/her determination pursuant to State and Safety Code §7050.5. and Public Resources Code (PRC) § 5097.98.

D. In the event that the human remains and/or cremations are identified as Native American, the Coroner shall notify the Native American Heritage Commission within 24 hours of determination pursuant to subdivision (c) of HSC §7050.5.

E. The Native American Heritage Commission shall immediately notify the person or persons it believes to be the Most Likely Descendant (MLD). The MLD has 48 hours, upon being granted access to the Project site, to inspect the site of discovery and make his/her recommendation for final treatment and disposition, with appropriate dignity, of the remains and all associated grave goods pursuant to PRC §5097.98

F. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or associated buried goods. However, the MLD may wish to rebury the human remains and/or cremation and sacred items in their place of discovery with no further disturbance where they will reside in perpetuity. The place(s)

of reburial will not be disclosed by any party and is exempt from the California Public Records Act (California Government Code § 6254[r]). The reburial location(s) of human remains and/or cremations and sacred items will be determined by the MLD, the landowner, and the Director of the City of Redlands Development Services Department, or their designee.

MM TCR-8 **Final Report.** The final report(s) created as a part of the project (CRMP/AMTP, isolate records, site records, survey reports, testing reports, Tribal monitoring logs, etc.) shall be submitted to the Director of the City of Redlands Development Services Department, or their designee Lead Agency, and the Consulting Tribes for review and comment. After approval of all parties, the final reports are to be submitted to the appropriate Information Center (IC), and the Consulting Tribes.

With implementation of **MMs TCR-1 through TCR-8,** impacts to tribal cultural resources would be **less than significant with mitigation incorporated.**

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant Impact with Mitigation Incorporated

Discussion of Effect: As discussed above in Section 3.18(a), the City engaged in tribal consultation with the Agua Caliente Band of Cahuilla Indians, the Gabrieleño Band of Mission Indians - Kizh Nation, the Morongo Band of Mission Indians and the Yuhaaviatam of San Manuel Nation responded, requesting further consultation pursuant to AB 52. Based on tribal consultation and the potential for the proposed project to inadvertently discover or unearth previously undocumented Native American tribal cultural resources during ground-disturbing activities, **MMs TCR-1 through TCR-8** are prescribed. With implementation of **MMs TCR-1 through TCR-8,** impacts to tribal cultural resources would be **less than significant with mitigation incorporated.**

3.19 UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water or wastewater treatment or storm drainage, electrical power, natural gas or telecommunication facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

The most recent version of California Emissions Estimator Model (CalEEMod) (Version 2022.1.1.22) was used to estimate the proposed project's demand on utilities that would be generated during operation of the proposed project. The CalEEMod output sheets are provided in **Appendix A.**

a. Require or result in the relocation or construction of new or expanded water or wastewater treatment or storm drainage, electrical power, natural gas or telecommunication facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact

Discussion of Effects: The proposed project would construct a business hotel, drive-through coffee shop, semi-automated car wash, and associated circulation, parking, infrastructure, and landscaping improvements on the undeveloped project site, which would increase demand on utilities from existing

conditions. The proposed project's demand on utilities, including water, wastewater, storm drainage, electrical power, and natural gas is discussed below.

Water. The City's Municipal Utilities and Engineering Department provides water service to the city, including the project site. The City operates two surface water treatment plants and uses 15 wells, 37 booster pumps, 18 reservoirs, and 400 miles of transmission and distribution lines to provide water to its customers. Of this infrastructure, one booster station is used for non-potable water. The capacity of the City's 18 reservoirs is a total of 54.45 million gallons. [67]

Domestic water service to the project site would be provided via separate service lateral connections to an existing 12-inch water line in California Street. These connections would split in four directions on the project site, providing water to the proposed coffee shop, hotel, and car wash, and running beneath the proposed secondary right-in/right-out entrance. As discussed under Section 3.19(b) below, the proposed project would not substantially increase demand for water and would therefore not exceed the capacity of existing water treatment facilities. As such, implementation of the proposed project would not require or result in the relocation or construction of new or expanded water supply infrastructure and the proposed project would not require any new infrastructure, aside from the project-specific tie-ins and water pipelines to serve the proposed project, and all proposed water infrastructure would be limited to the project site. Therefore, the impact of the proposed project on water infrastructure would be **less than significant.**

Wastewater. The City's Municipal Utilities and Engineering Department also provides wastewater collection and treatment services in the City and maintains existing sanitary sewer lines within the vicinity of the project site. Sewer service to the project site would be provided via a sewer line beneath the proposed main signalized entrance, which would connect to an existing 12-inch sewer line in California Street. Each building would have its own sewer lateral that would connect to the existing sewer line.

The City's wastewater treatment plant, Redlands Wastewater Treatment Facility, currently treats approximately 6 million gallons per day (mgd) and has the capacity to process up to 9.5 mgd.[68] The proposed project would result in typical wastewater discharges that would not require new methods or equipment for treatment that are not currently permitted for the Redlands Wastewater Treatment Facility, which would serve the proposed project. Based on the CalEEMod results, the proposed project is estimated to generate approximately 2,848,947 gallons of wastewater per year (approximately 7,805 gallons per day).[69] Based on this estimate, the proposed project would contribute less than 0.1 percent[70] of the current wastewater treatment rate of the Redlands Wastewater Treatment Facility. As such, the Redlands Wastewater Treatment Facility would have adequate capacity to accommodate the wastewater flow from the proposed project and the existing sewer system has adequate capacity for the project. Therefore, impacts associated with the project's construction would be **less than significant**.

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67 City of Redlands. 2017b. City of Redlands General Plan 2035 Environmental Impact Report. Website: https://www.cityofredlands.org/post/planning-division-general-plan (accessed November 2024).

68 City of Redlands. n.d.-c. Waste Water Treatment. Website: https://www.cityofredlands.org/post/wastewater-treatment (accessed January 31, 2025).

69 In the absence of an official wastewater generation rate, wastewater can be reasonably assumed to be 90 percent of water use. 3,165,497 of gallons per year * 0.9 = 2,848,947.3 gallons per year / 365 days per year = 7,805.33 gallons per day.

70 7,805 gallons per day / 9.5 million gallons per day (mgd) = 0.00082

Stormwater. Under existing conditions, the project site is entirely covered by pervious surfaces. The existing topography of the project site gently slopes from northeast to southwest towards the existing drainage channel, Mission Channel, along the southwest boundary of the project site, with approximately 0.5 to 2 percent slopes. Under existing conditions, stormwater at the project site either infiltrates at the project site or sheet flows southwest to discharge into Mission Channel.

The proposed project would increase the impervious surface coverage on the project site compared to existing conditions. However, the proposed project would generally maintain the existing drainage pattern at the project site, infiltrating stormwater at the project site and reducing the peak runoff from the project site prior to discharging at Mission Channel. The proposed project would include three infiltration basins (Basins A, B, and C) that would be appropriately sized to retain and infiltrate the required Design Capture Volume for the project site (10,398 cubic feet), while detaining and reducing the developed peak runoff such that the 100-year outflows would be less than the 25-year existing event, as required by the San Bernardino County Municipal Separate Storm Sewer System (MS4) Permit. Emergency overflow and the reduced peak runoff from the project site would be discharged into Mission Channel via a calibrated outlet structure at the northwest corner of the project site. As discussed in Section 3.10, Hydrology and Water Quality, the implementation of the proposed infiltration basins would comply with all applicable regulatory compliance measures and would not result in significant environmental effects from the construction of new or expanded storm drainage facilities. Therefore, impacts associated with the construction of the proposed stormwater infrastructure would be **less than significant.**

Electricity and Natural Gas. Electrical service would be provided by Southern California Edison (SCE) and the Southern California Gas Company (SoCalGas) would provide natural gas service. Electrical service would be provided by SCE through connections to the existing overhead lines along California Street. The location and size of natural gas facilities would be coordinated with SoCalGas, who would provide natural gas to the project site through connections to natural gas infrastructure in California Street. Section 3.6, Energy, discusses the proposed project's energy requirements (i.e., electricity, fuel consumption, and natural gas consumption). As discussed in Section 3.6, the proposed project would consume nominal amounts of electricity and natural gas when compared to what is currently being generated and being consumed within the City and within the region. The energy suppliers would have enough electricity and natural gas to adequately serve the proposed project once it is developed and operational. As such, implementation of the proposed project would not require or result in the relocation or construction of new or expanded electricity or natural gas supply infrastructure, and impacts would be **less than significant.**

Overall, because the proposed project would connect to existing utility services within or adjacent to the project site, the proposed project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects, and this impact would be **less than significant**. No mitigation is required.

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

Less Than Significant Impact

Discussion of Effects: As discussed above, water services are provided to the City and the project site by the City's Municipal Utilities Department, which is party to the 2020 Upper Santa Ana River Watershed

Integrated Regional Urban Water Management Plan (IRUWMP). Chapter 4 of the 2020 Upper Santa Ana River Watershed IRUWMP provides the City's Urban Water Management Plan (UWMP). According to the City's 2020 UWMP, the City's water use in 2020 (potable, raw, and recycled water) totaled 26,866 acre-feet (af), with commercial and institutional uses accounting for approximately 12 percent (2,640 af) of the City's potable water usage. The average water use for the City is projected to be 27,902 af per year (afy) in 2035 and 29,735 afy in 2045. In addition, the 2020 UWMP indicates that the City has sufficient supplies to meet projected water demands in normal, single dry and multiple dry years.[71]

Based on the CalEEMod results, the proposed project's estimated water usage would be 3,165,497 gallons per year or 9.81 afy.[72] Based on this estimate, the proposed project would account for less than 0.1 percent of the total water usage for the City in 2035 and 2045. This represents a negligible percent of the City's projected service-wide annual water demand for 2035 and 2045. Furthermore, the City's projected water demand accounts for projected growth within the region as identified by the City's General Plan. As the proposed project is consistent with the General Plan designation for the project site, the proposed project's water demand has been accounted for in the City's water supply and demand estimates. Therefore, the City would not require new or expanded water entitlements to serve the proposed project, and impacts would be **less than significant**. No mitigation is required.

c. Result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact

Discussion of Effects: Please refer to the discussion under Section 3.19(a), above. Based on modeled flows, the proposed project would contribute less than one percent of the current wastewater treatment rates of the Redlands Wastewater Treatment Facility. The Redlands Wastewater Treatment Facility would have adequate capacity to serve the proposed project's projected demand in addition to the provider's existing commitments, and impacts would be **less than significant.** No mitigation is required.

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? Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than Significant Impact

Discussion of Effects: Solid waste in the city is primarily disposed of at the California Street Landfill, which is operated by the City's Facilities and Community Services Department, and the San Timoteo Sanitary Landfill, which is operated by San Bernardino County.[73] The California Street Landfill, located at 2151 Nevada Street, accepts a maximum of 829 tons of solid waste per day and as of July 7, 2023, had a remaining capacity of 4,184,751 cubic yards.[74] The maximum permitted capacity is 11,400,000 cubic yards

[71] City of Redlands. 2021. 2020 Integrated Regional Urban Water Management Plan (IRUWMP), Part 2, Chapter 4, Redlands 2020 UWMP. May 27.

[72] 1 US gal/yr = .0000031 afy

[73] City of Redlands. 2017b. City of Redlands General Plan 2035 Environmental Impact Report. Website: https://www.cityofredlands.org/post/planning-division-general-plan (accessed November 2024).

[74] California Department of Resources Recycling and Recovery (CalRecycle). 2025. Solid Waste Information System Facility Detail. Website: https://calrecycle.ca.gov/SWFacilities/ (accessed January 31, 2025).

and is anticipated to reach full capacity by 2042. This landfill currently accepts the following types of solid waste: construction/demolition debris, mixed municipal, other designated, and sludge (biosolids).[75] The San Timoteo Sanitary Landfill, located at San Timoteo Canyon Road, accepts a maximum of 2,000 tons of solid waste per day and as of January 19, 2022, has a remaining capacity of 11,780,000 cubic yards. The San Timoteo Sanitary Landfill's maximum permitted capacity is 23,685,785 cubic yards and is anticipated to reach full capacity by June 1, 2038.[76]

The project site is currently undeveloped and generates no solid waste under existing conditions. Construction and operation of the proposed hotel, drive-through coffee shop, and semi-automatic car wash would increase the amount of solid waste generated at the project site from existing conditions. Based on the CalEEMod results for the proposed project, the proposed project is anticipated to generate an estimated 77.4 tons of solid waste per year (0.2 tons per day). This estimate accounts for less than 0.1 percent[77] of the maximum solid waste accepted per day by the California Street Landfill and approximately 0.01 percent[78] of the maximum solid waste accepted per day at the San Timoteo Sanitary Landfill. This increase in solid waste would be negligible compared to maximum allowable capacity per day for these landfills. As such, the project would be served by a landfill with sufficient capacity to accommodate the project's waste disposal needs, and impacts associated with the disposition of solid waste would be **less than significant**. No mitigation is required.

e. Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact

Discussion of Effects: All land uses within the city that generate waste are required to coordinate with a waste hauler to collect solid waste on a common schedule as established in applicable local, regional, and State programs. Additionally, all development within the city, including the proposed project, is required to comply with applicable elements of AB 1327, Chapter 18 (California Solid Waste Reuse and Recycling Access Act of 1991), AB 939 (California Department of Resources Recycling and Recovery [CalRecycle]), and other local, State, and federal solid waste disposal standards.

The proposed project would be required to comply with applicable provisions of AB 1327, AB 939, and AB 341 related to solid waste as a matter of policy. In addition, as noted above, the California Street Landfill and the San Timoteo Sanitary Landfill have adequate capacity to serve the proposed project. Therefore, impacts related to solid waste regulations would be **less than significant**. No mitigation is required.

[75] California Department of Resources Recycling and Recovery (CalRecycle). 2025. Solid Waste Information System Facility Detail. Website: https://calrecycle.ca.gov/SWFacilities/ (accessed January 31, 2025).

[76] CalRecycle. 2025. Solid Waste Information System Facility Detail. Website: https://calrecycle.ca.gov/SWFacilities/ (accessed January 31, 2025).

[77] 0.2 tons per day / 829 tons per day = 0.00025579

[78] 0.2 tons per day / 2,000 tons per day = 0.0001

3.20 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 with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

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

Less Than Significant Impact

Discussion of Effect: Please refer to Section 3.9(f) of this IS/MND for a discussion on impacts pertaining to the proposed project's potential to substantially impair an adopted emergency response plan or emergency evacuation plan. The design of the proposed project would be submitted for review and approval by the RFD and RPD prior to the issuance of building permits in order to ensure development would not interfere with the City's Emergency Management framework. In addition, adherence to the emergency access measures required by the City would ensure that potential impacts related to physical interference with an adopted emergency response plan or emergency evacuation plan would be **less than significant**, and no mitigation is required.

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?

Less Than Significant Impact

Discussion of Effect: The project site is not located within an LRA or SRA high fire hazard severity zone according to California Department of Forestry and Fire Protection (CAL FIRE).[79] The City's General Plan EIR indicates that the project site is located in an area designated as a Moderate Fire Level Threat.[80] The nearest designated fire hazard severity zones to the project site are associated with the Santa Ana River Wash, located 1.5 miles north of the project site, and the foothills of the San Jacinto Mountain range, located 1.8 miles south of the project site.[81] As such, no hillside areas or natural areas prone to wildfires are located in the immediate vicinity of the project site. In addition, the project site is located in a highly urbanized area of the city, developed with residential neighborhoods and commercial areas. Winds may push wildfire smoke into the area of the proposed project; however, these conditions would be temporary and if conditions warranted, the local air quality control district would warn residents of potential impacts due to wildfire smoke. The proposed project would be required to implement and abide to the City's General Plan policies, specifically Policies 7-A.83 through 7-A.106, that promote fire safety through agency cooperation and management of risk factors; adhere to applicable building and fire codes; and implement existing programs such as weed abatement and education under the RFD; all of which would reduce the wildfire risk at the project site.

In addition, the project-specific Fire Master Plan outlines inspection, general, and project-specific requirements for the proposed project, subject to approval by the RFD[82]. These requirements include but are not limited to the implementation of an underground piping plan, a chemical classification and hazardous materials compliance plan, a fire alarm system, and a sprinkler system. Due to the nature of the project site and surrounding areas, on-site and adjacent areas have minimal capability to support a wildfire. Therefore, impacts related to this issue would be **less than significant**, and no mitigation is required.

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

Less Than Significant Impact

Discussion of Effect: The project site is located an urbanized area of the city that is already served by existing water, wastewater, power, and roadway infrastructure, and the proposed project would connect to the existing infrastructure networks in the surrounding area. The project-specific Fire Master Plan requires an underground piping plan for the installation of an automatic fire sprinkler system. The Fire Master Plan would require the proposed project to develop several compliance plans in order to ensure no impacts related to the environment and is subject to California Fire Code and California Building Code (CBC) requirements as well as approval by the RFD. Therefore, the proposed project would not create any additional environmental impacts due to the installation or maintenance of required infrastructure that are not already address and mitigated, if necessary, in this IS/MND. Impact would be **less than significant**, and no mitigation is required.

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79 CAL FIRE. 2025. Fire Hazard Severity Zones. March 24. Website: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones (accessed March 2025).

80 City of Redlands. 2017b. City of Redlands General Plan 2035 Environmental Impact Report. Website: https://www.cityofredlands.org/post/planning-division-general-plan (accessed November 2024).

81 CAL FIRE. 2025. Fire Hazard Severity Zones. March 24. Website: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones (accessed March 2025).

82 Lutz and Associated Consulting. 2024. The Commons at California Fire Master Plan. April 30.

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?

No Impact

Discussion of Effect: Similar to adjacent properties, the project site is generally flat. No hillside areas or natural areas prone to wildfire fire are located in the immediate vicinity, and none of the surrounding areas or and uses are prone to wildfires. Therefore, implementation of the proposed project would not expose persons or structures to post-fire slope instability or post-fire drainage. **No impact** would occur.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

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

Less Than Significant Impact with Mitigation Incorporated.

Discussion of Effects: The proposed project's impacts to biological resources and cultural resources were analyzed in this IS/MND, and all direct, indirect, and cumulative impacts were determined to have **no impact**, a **less than significant impact**, or reduced to a **less than significant impact with mitigation incorporated.**

As discussed in Section 3.4, Biological Resources, no special-status plant species or special-status vegetation communities were observed within the project site during the field survey. The nearest United States Fish and Wildlife Service (USFWS) designated critical habitat to the project site is for the San Bernardino kangaroo rat and is located approximately 1.5 miles north of the project site, but this critical habitat is separated from the project site by existing development, including I-10. Therefore, the Biological

Resource Letter Report determined that the proposed project would have a less than significant impact on special-status animal species, as no special-status species or suitable habitat conditions were observed on the project site. In addition, the implementation of the proposed project would not cause fish or wildlife populations to drop below self-sustaining levels or restrict the movement/distribution of rare or endangered species. While no breeding or nesting birds or raptors were observed within the project site and surrounding vicinity, vegetation on the project site could provide nesting habitat for birds protected by the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code. However, implementation of **RCM BIO-1**, which requires pre-construction nesting bird surveys, would ensure any impacts to migratory and nesting birds would be **less than significant**.

As discussed in Section 3.5, Cultural Resources, development of the proposed project would not affect known historic or archaeological resources, and as discussed in Section 3.7, Geology and Soils, would not affect any known paleontological resources. There are no known unique ethnic or cultural values associated with the project site, nor are known religious or sacred uses associated with the project site. Implementation of **RCMs CUL-1** and **CUL-2**, which require compliance with applicable State laws and regulations related to the unanticipated discovery of previously unknown cultural resources, including human remains, would ensure impacts to known, unknown, or potential cultural resources, including human remains, that may be located within the project site would be **less than significant**. Furthermore, as discussed in Section 3.18, Tribal Cultural Resources, the City engaged in tribal consultation with the Agua Caliente Band of Cahuilla Indians, the Gabrieleño Band of Mission Indians - Kizh Nation, the Morongo Band of Mission Indians and the Yuhaaviatam of San Manuel Nation responded, requesting further consultation pursuant to AB 52. Based on tribal consultation and the potential for the proposed project to inadvertently discover or unearth previously undocumented Native American tribal cultural resources during ground-disturbing activities, **MMs TCR-1 through TCR-8** are prescribed. Implementation of **MMs TCR-1 through TCR-8** would reduce impacts to previously unknown tribal cultural resources that may be located within the project site to **less than significant**.

In addition, **MM GEO-1** has been prescribed to reduce any potential impact on unknown and unanticipated paleontological resources on the project site. As required by **MM GEO-1**, if paleontological resources are unintentionally unearthed during project construction, work would be temporarily halted until the significance of the find is determined by a qualified paleontologist and appropriate actions are taken.

Adherence to **RCMs BIO-1, CUL-1,** and **CUL-2,** and implementation of **MM GEO-1** and **MMs TCR-1 through TCR-8**, would ensure potential impacts to biological, cultural, and paleontological resources would be **less than significant with mitigation incorporated**.

b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

Less Than Significant Impact

Discussion of Effects: The proposed project would have either **no impact**, a **less than significant impact**, or a **less than significant impact with mitigation incorporated** with respect to all environmental issues pursuant to CEQA. Due to the limited scope of direct physical impacts to the environment associated with the proposed project, the proposed project's impacts are primarily project specific in nature.

The cumulative effects resulting from build out of the City's General Plan were previously identified in the General Plan EIR. The type, scale, and location of the proposed project is consistent with the General Plan. Because of this consistency, the potential cumulative impacts of the proposed project would fall within the impacts identified in the City's General Plan EIR. In addition, the Applicant is required to pay their "fair share" of Development Impact Fees (DIFs) associated with the proposed project. Therefore, the proposed project would have a **less than cumulatively considerable impact**.

c. Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant with Mitigation Incorporated

Discussion of Effects: Based on the analysis provided throughout this IS/MND, with incorporation of mitigation measures and regulatory compliance measures, the proposed project would not result in any environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly. Potential impacts on human beings would be **less than significant with mitigation incorporated.**

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