

**Addendum prepared by the
Commission's
Environmental Consultant,
Tom Dodson and
Associates, Including the
City's Environmental
Assessment and Mitigated
Negative Declaration for
Annexation No. 94**

Attachment 6

TOM DODSON & ASSOCIATES
2150 N. ARROWHEAD AVENUE
SAN BERNARDINO, CA 92405
TEL (909) 882-3612 • FAX (909) 882-7015
E-MAIL tda@tdaenv.com



November 3, 2017

Ms. Kathleen Rollings-McDonald
Executive Officer
Local Agency Formation Commission
1170 West 3rd Street, Unit 150
San Bernardino, CA 92415-0490

RECEIVED
NOV 06 2017

LAFCO
San Bernardino County

Dear Kathy:

LAFCO 3207 consists of a request by the City of Redlands (City) for a Reorganization to include City of Redlands Annexation No. 94 and Detachments from San Bernardino County Fire Protection District, its Valley Service Zone, County Service Area 70 and its Zone P-7 (Jacinto Tract). The proposed Reorganization area consists of two parcels (Assessor Parcel Numbers 0299-011-11 and 0299-011-12) that encompass approximately 12 +/- acres. The Reorganization area is bounded by parcel lines on the north and east, Sylvan Boulevard on the south, and Wabash Avenue (existing City of Redland' s boundary) on the west . The Reorganization area is within the City of Redlands' eastern Sphere of Influence, which is commonly known as the Mentone community. The reorganization area has been modified by LAFCO staff to include the full right-of-way easement of Sylvan Boulevard adjacent to Tentative Tract Map 19942.

The City of Redlands prepared an environmental document, Initial Study to support a Mitigated Negative Declaration (IS/MND) and approved a Zone Change (No. 454), Tentative Tract Map (No. 19942), and adopted the IS/MND on March 21, 2017. The Notice of Determination was filed on March 22, 2017. This document concluded that implementation of the proposed residential subdivision would not result in significant adverse environmental impacts to the environment with implementation of a number of mitigation measures that all fall within the City' s jurisdiction. Subsequent to adoption of the City' s Mitigated Negative Declaration (MND), LAFCO Staff determined that the actual area proposed for Reorganization should be expanded to include the Sylvan Boulevard ROW adjacent to the project site. This raises the actual acreage being considered for annexation under LAFCO 3207, which is slightly larger than the 11.97 acre area considered in City' s MND. Based on the Staff review, the disparity between the City' s MND acreage and the Reorganization acreage is the inclusion of adjacent public Sylvan Boulevard ROW. After reviewing this disparity and utilizing the CEQA requirements for subsequent review (Section 15162 of the State CEQA Guidelines), I recommend that the Commission rely upon the City' s IS/MND

and this letter report which will serve as an Addendum to that document. Thus, the Commission will be utilizing the IS/MND as the base environmental document and this letter Addendum as a CEQA Lead Agency for LAFCO 3207. This is because the addition of the adjacent public right-of-way to the Reorganization, which is an existing paved roadway, will not result in any additional adverse impact on the physical environment.

Environmental Review Process

LAFCO has prepared this Addendum in accordance with the current CEQA Statutes and Guidelines for implementing CEQA. CEQA Section 15164 includes the following procedures for the preparation and use of an Addendum:

- (b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.
- (c) An addendum need not be circulated for public review, but can be included in or attached to the Final EIR or adopted negative declaration.
- (d) The decision-making body shall consider the addendum with the Final EIR or adopted negative declaration prior to making a decision on the project.
- (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

Note that Section 15164 (a) addresses use of an Addendum in conjunction with a Final EIR, which is not the procedure being used in this document. If changes to a project or its circumstances occur or new information becomes available after certification of an EIR or MND, the lead agency may: (1) prepare a subsequent EIR if the criteria of State CEQA Guidelines Section 15162(a) are met, (2) prepare a subsequent negative declaration, (3) prepare an addendum, or (4) prepare no further documentation. (State CEQA Guidelines Section 15162(b)) When only minor technical changes or additions to the certified EIR are necessary and none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred, CEQA allows the lead agency to prepare and adopt an addendum. (State CEQA Guidelines, Section 15164(a))

Under Section 15162, a subsequent EIR or negative declaration is required only when:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the negative declaration due to the involvement of any new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the negative declaration was adopted, shows any of the following:
- (A) The project will have one or more significant effects not discussed in the previous negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternative; or
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Based on the change in the expanded Reorganization being considered under LAFCO 3207, LAFCO concludes that an Addendum is the appropriate environmental determination for this second tier environmental review process to comply with CEQA. This is because the addition of the entire right-of-way easement of Sylvan Boulevard adjacent to TTM 19942 to the area being annexed under 3207 has no potential to cause or result in additional adverse impacts (physical changes) to the environment.

This Addendum, combined with the City' s original Initial Study, serves as the basis for this second tier environmental review of the City' s decision to adopt the IS/MND and approve the residential subdivision. This Addendum modifies the original IS/MND adopted by the City in March 2017 as its California Environmental Quality Act (CEQA) environmental determination for the proposed implementation of the City' s rezoning and tract map development. Aside from the inclusion of the Sylvan Boulevard roadway easement, no other changes in the approved project are proposed at this time.

Pursuant to the provisions of CEQA and State and local CEQA Guidelines, LAFCO is the Lead Agency for the LAFCO 3207, and is charged with the responsibility of deciding whether or not to approve the original annexation area and the proposed modifications to the project as described above and this Addendum as a second tier CEQA environmental determination. As part of its decision making process, LAFCO is required to review and consider the potential environmental effects that could result from modifying the original project relative to the previously approved project. LAFCO has compiled this Addendum as the basis for making a new CEQA environmental determination for the modified project, LAFCO 3207.

Under this situation, I recommend that the Commission take the following steps if it chooses to approve LAFCO 3207, acting as a CEQA Lead Agency:

1. Indicate that the Commission staff and environmental consultant have independently reviewed the City's IS/MND and found them adequate for the City's proposed Reorganization.
2. The Commission needs to indicate that it has considered the Mitigated Negative Declaration and environmental effects, as outlined in the Initial Study, and this Addendum prior to reaching a decision on the project and finds the information substantiating the Mitigated Negative Declaration and Addendum adequate for approval of the Reorganization.
3. The Commission should indicate that it does not intend to adopt alternatives or mitigation measures for this project. Mitigation measures were required for this project and they will remain the responsibility of the City to implement.
4. File a Notice of Determination with the County Clerk of the Board as a CEQA Lead Agency for LAFCO 3207.

If you have any questions regarding these recommendations, please feel free to give me a call.

Sincerely,



Tom Dodson

DATE FILED & POSTED

Posted On: 3/22/17

Removed On: 5/4/17

Receipt No: 30-032217-163 Appendix D

Notice of Determination

TO: Clerk of the Board of Supervisors
County of San Bernardino
385 North Arrowhead Avenue
San Bernardino, CA 92415-0130

 Office of Planning and Research
P.O. Box 3044
Sacramento, CA 95812-3044

FROM: City of Redlands
Planning Division
P.O. Box 3005
Redlands, CA 92373

SUBJECT: *Filing of Notice of Determination in Compliance with Section 21152 of the Public Resources Code.*

State Clearinghouse Number: 2017011069

Project Title: Sam-Redlands, LLC Tract [Annexation No. 94 (LAFCO 3207), Zone Change No. 454, Tentative Tract No. 19942, and Demolition Permit No. 258.]

Project Applicant: Sam-Redlands LLC

Loralee Farris, Principal Planner
Contact Person

(909) 798-7555
Telephone Number

Project Location: The development project is located on 11.97 acres located on the east side of Wabash Avenue, and the north side of Sylvan Boulevard (APNs: 0299-011-11, 12).

Project Description:

The project includes a request for annexation of contiguous parcels (11.97 acres) into the City of Redlands (as required by Section 16.60.030 of the Redlands Municipal Code to connect to City water and sewerage systems), a zone change application to pre-zone the 11.97 acres as R-1 (Single Family Residential) District, and a Tentative Tract Map to subdivide 11.97 acres into thirty four (34) residential lots, ranging in size from 7,200 square feet to 16,454 square feet in size, and four (4) lettered lots for landscaping, open space and stormwater basins.

This is to advise that the City of Redlands City Council has approved Annexation No. 94, Zone Change No. 454, Tentative Tract Map No. 19942 on March 21, 2017 and made the following determinations:

1. The project will not have a significant effect on the environment.
2. An Environmental Impact Report was prepared and certified for this project pursuant to the provisions of CEQA.
- A Negative Declaration was prepared for this project pursuant to the provisions of CEQA.
- A Mitigated Negative Declaration was prepared for this project pursuant to the

provisions of CEQA.

3. Mitigation measures were made a condition of the approval of the project.
4. A mitigation reporting or monitoring plan was adopted for this project.
4. A Statement of Overriding Considerations was not adopted for this project.
5. Findings were not made pursuant to the provisions of CEQA.

This is to certify that the Mitigated Negative Declaration and record of project approval are available to the general public and may be examined at the City of Redlands Development Services Department, Planning Division at 35 Cajon Street, Suite 20, Redlands, CA 92373.



Lorelee Farris
Principal Planner
March 22, 2017



Date Received for Filing

**RESPONSES TO COMMENTS
LETTER #1
OFFICE OF PLANNING AND RESEARCH
STATE CLEARINGHOUSE**

- 1-1 This is an acknowledgement letter verifying that the State Clearinghouse submitted the Initial Study and proposed Mitigated Negative Declaration (MND) to selected state agencies for review, and that one state agency (State Department of Fish and Wildlife) submitted comments by the close of the review period, which occurred on February 27, 2017. The State Clearinghouse assigned this project the following tracking number, SCH #2017011069. This letter is for information purposes only.

**RESPONSES TO COMMENTS
LETTER #2
STATE DEPARTMENT OF FISH AND WILDLIFE**

The lead agency appreciates the State Department of Fish and Wildlife's comments on the proposed project.

- 2-1 The mitigation measures for BIO-1 and BIO-2 have been amended to incorporate the preferred language of the State Department of Fish and Wildlife. See attached response from the research biologist of Cadre Environmental.

- 2-2 The project will be required to adhere to the City's Water Efficient Landscaping Ordinance, to promote the conservation and efficient use of water and to prevent the waste of this valuable resource, which includes the incorporation of drought tolerant landscaping.

RESPONSES TO COMMENTS
LETTER #3
COUNTY OF SAN BERNARDINO DEPARTMENT OF PUBLIC WORKS

- 3-1 The lead agency appreciates the County of San Bernardino Department of Public Works' comments on the proposed project. This comment has been noted.
- 3-2 So noted.
- 3-3 So noted.
- 3-4 The City of Redlands concurs with the County of San Bernardino on the current flood zone designations on-site (Zone X and Zone A-E), which has been clarified in the Initial Study. The applicant has provided a FEMA Zone Exhibit for Tentative Tract No. 19942, which is consistent with this comment.
- 3-5 Please see attached responses from the research biologist with Cadre Environmental. In concurrence, staff has incorporated a condition of approval to require the installation of a Dog Waste Bag Dispenser and Trash Bin at the entrance of the trail, as well as signage urging the proper pick-up and disposal of dog waste.



STATE OF CALIFORNIA

GOVERNOR'S OFFICE of PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT



EDMUND G. BROWN JR.
GOVERNOR

February 28, 2017



KEN ALEX
DIRECTOR

Loralee Farris
City of Redlands
PO Box 3005
Redlands, CA 92373

Subject: Sam-Redlands Tract (Annex 94, Zone Change 454, TT 19942, Demolition Permit No..258)
SCH#: 2017011069

Dear Loralee Farris:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on February 27, 2017, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1-1

**Document Details Report
State Clearinghouse Data Base**

SCH# 2017011069
Project Title Sam-Redlands Tract (Annex 94, Zone Change 454, TT 19942, Demolition Permit No. 258)
Lead Agency Redlands, City of

Type MND Mitigated Negative Declaration
Description Entitlement actions include: 1) approval of a proposed annexation of approximately 11.97 acres from the unincorporated area of the county of San Bernardino into the boundaries of the city of Redlands, 2) approval of a proposed zone change to pre-zone approximately 11.97 acres to be annexed from rural-living to single family residential district, 3) approval of tentative tract map no. 19942 to subdivide approximately 11.97 acres into thirty four single family residential lots (7,200-16,450 sf in size) and four lettered lots, and 4) approval of a demolition permit to allow removal of one existing residential structure on the subject site, two commercial buildings, one carport, and one garage and shed.

Lead Agency Contact

Name Lorelee Farris
Agency City of Redlands
Phone (909) 798-7555
email
Address PO Box 3005
City Redlands
Fax
State CA **Zip** 92373

Project Location

County San Bernardino
City Redlands
Region
Lat / Long 34° 03' 29.8" N / 117° 08' 16.7" W
Cross Streets Wabash Ave and Sylvan Blvd
Parcel No. 0299-011-11, -12
Township **Range** **Section** **Base**

Proximity to:

Highways hwy 38
Airports Redlands
Railways
Waterways Mill Creek Zanja Canal
Schools Crafton
Land Use USE: single family residence, contractors yard, citrus groves zoning: rural living GP Des: low density residential

Project Issues Aesthetic/Visual; Agricultural Land; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Water Quality; Landuse

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 6; Department of Parks and Recreation; Department of Water Resources; Resources, Recycling and Recovery; California Highway Patrol; Caltrans, Division of Aeronautics; Caltrans, District 8; Native American Heritage Commission; State Water Resources Control Board, Division of Drinking Water, District 13; Regional Water Quality Control Board, Region 8

Date Received 01/27/2017 **Start of Review** 01/27/2017 **End of Review** 02/27/2017



State of California - Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Inland Deserts Region
3602 Inland Empire Blvd., Suite C-220
Ontario, CA 91764
(909) 484-0167
www.wildlife.ca.gov

EDMUND G. BROWN, Jr., Governor
CHARLTON H. BONHAM, Director



February 27, 2017
Sent via email

Ms. Lorelee Farris
Principal Planner
City of Redlands
Community Development Department
P.O. Box 3005
Redlands, CA 92373
lfarris@cityofredlands.org

Subject: Initial Study and Mitigated Negative Declaration
Sam-Redlands Tract (Annex 94, Zone Change 454, TT 19942,
Demolition Permit No. 258)
State Clearinghouse No.2017011069

Dear Ms. Farris:

The Department of Fish and Wildlife (Department) appreciates the opportunity to comment on the Initial Study and Mitigated Negative Declaration (IS/MND) for the Sam-Redlands Tract (project). The Department is responding to the IS/MND as a Trustee Agency for fish and wildlife resources (California Fish and Game Code Sections 711.7 and 1802, and the California Environmental Quality Act [CEQA] Guidelines Section 15386), and as a Responsible Agency regarding any discretionary actions (CEQA Guidelines Section 15381), such as the issuance of a Lake or Streambed Alteration Agreement (California Fish and Game Code Sections 1600 et seq.) and/or a California Endangered Species Act (CESA) Permit for Incidental Take of Endangered, Threatened, and/or Candidate species (California Fish and Game Code Sections 2080 and 2080.1).

The project proposes the removal of a citrus grove, two commercial structures, two accessory structures, and a single family residence and construction of thirty four single family residences, four open space lots, an infiltration basin, and associated roadways on approximately 11.97 acres. The project site is located northeast of the intersection of Sylvan Boulevard and Wabash Avenue in Redlands, San Bernardino County; within assessor parcel numbers 0299-011-11 and 0299-011-12.

COMMENTS AND RECOMMENDATIONS

The Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and the habitat necessary for

Conserving California's Wildlife Since 1870

biologically sustainable populations of those species (i.e., biological resources); and administers the Natural Community Conservation Planning Program (NCCP Program). The Department offers the comments and recommendations presented below to assist the City of Redlands (City; the CEQA lead agency) in adequately identifying and/or mitigating the project's significant, or potentially significant, impacts on biological resources. Following review of the IS/MND the Department has concerns related to project-related impacts to bats and nesting birds, and the adequacy and enforceability of mitigation measures proposed by the City. The Department's comments and recommendations on the IS/MND include:

Bats

The Department appreciates that the IS/MND has addressed potential impacts to bats. To increase the specificity and enforceability of Mitigation Measure (MM) BIO-1 the Department recommends that the City revise MM BIO-1 and condition the measure to include the following (edits are in **bold** and ~~strikethrough~~):

Mitigation Measure BIO-1: A detailed bat survey shall be conducted by a qualified **bat** biologist prior to **site preparation or ground-disturbing activities, including, but not limited to** demolition of ~~on-site the abandoned structures on-site~~ and/or the removal or **trimming** of mature trees and palms. **Any locations with potential for roosting or suitable as a maternity roost will be surveyed by the qualified bat biologist using an appropriate combination of structure inspection, exit counts, and acoustic surveys. Surveys shall be conducted during the appropriate season and time of day/night to ensure detection of bats. If bats are found using any structures or trees within the project area, the qualified bat biologist shall identify the bats to the species level, and evaluate the colony to determine its size and significance. The bat survey shall include: 1) the exact location of all roosting sites (location shall be adequately described and drawn on a map); 2) the number of bats present at the time of visit (count or estimate); 3) each species of bat present shall be named (include how the species was identified); and 4) the type of roost, i.e., a night roost (rest at night while out feeding) versus a day roost (resting during the day). A report containing the bat survey findings shall be submitted to the City and to the Department of Fish and Wildlife (Department), at the following address: 3602 Inland Empire Blvd., Suite C-220, Ontario, CA 91764.**

If a roosting site and/or maternity colony(s) is detected, and the qualified bat biologist determines that impacts (either direct or indirect, including disturbance from noise, vibration, dust, exhaust) from project-related activities may occur, the Applicant shall consult with the Department to determine the most appropriate type of avoidance, minimization, and mitigation measures to implement. Examples of avoidance and

minimization strategies may include daily work timing restrictions and buffer distances. Work timing restrictions and buffer distances will be determined based on the expert opinion of the qualified bat biologist, as approved by the Department. Mitigation measures may include replacement of impacted roosting sites with alternate roosting structures. Alternate roosting structures shall be designed to ensure use by bats impacted by the project. For example, designs will take into consideration the thermal and crevice/structure roosting requirements of the impacted bats. If a nonbreeding bat colony is detected, all individuals shall be humanely evicted based upon the direction of the monitoring biologist. If a maternity colony is detected on site, a construction free buffer shall be established around the buildings and/or mature trees and palms until it has been determined by a qualified biologist that the nursery is no longer active. Removal of structures, and/or the removal or trimming of trees, and palms shall preferably be done not occur during the bat maternity season, typically between March 15 through September 15 and April 15, or August 15 and October 15, to avoid interfering with the active nursery.

Burrowing Owl and Nesting Birds

Mitigation Measure (MM) BIO-2 provides mitigation measures for impacts to burrowing owl and nesting birds. Please note it is the project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Migratory non-game native bird species are protected by international treaty under the federal Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 *et seq.*). In addition, sections 3503, 3503.5, and 3513 of the Fish and Game Code (FGC) afford the following protective measures: Section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by FGC or any regulation made pursuant thereto; Section 3503.5 states that it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by FGC or any regulation adopted pursuant thereto; and Section 3513 states that it is unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA. Because some avian species may not adhere to the nesting dates stated in the IS and proposed MND the Department recommends that the City revise MM BIO-2 to require the completion of nesting bird surveys regardless of time of year to ensure compliance with all applicable laws related to nesting birds and birds of prey.

The Department also recommends that surveys occur over the entirety of the project site, and not be limited to those areas with shrubs and trees, as not all bird species nest in vegetation; some species nest directly on the ground. The

Department recommends that the City revise MM BIO-2 and condition the measure to include the following (edits are in **bold** and ~~strikethrough~~):

Mitigation Measure BIO-2: ~~If construction is proposed between February 1 and August 31, a~~ A qualified biologist shall conduct a burrowing owl and nesting bird survey(s) no more than three days prior to initiation of **grading project-related activities** to document the presence or absence of nesting birds within or directly adjacent (4500 feet) to the project site. The survey(s) shall focus upon identifying any raptor and/or passerine nests that ~~may be~~ **may be** directly or indirectly affected by ~~construction~~ **project-related** activities. If active burrowing owl or other avian nests are documented, species-specific measures shall be prepared by a qualified biologist and implemented to prevent abandonment of the active nest. At a minimum, **grading disturbances** in the vicinity of a nest shall be postponed until the young birds have fledged. A minimum exclusion buffer of 100 feet shall be maintained during construction, depending upon the species and location. The perimeter of the nest setback zone shall be fenced or adequately demarcated with stakes and flagging at 20-foot intervals, and construction personnel and activities restricted from the area.

Additional Comments and Recommendations

Landscaping

2-2 California is experiencing one of the most severe droughts on record. To ameliorate the water demands of this project, the Department recommends incorporation of water-wise concepts in project landscape design plans. In particular the Department recommends xeriscaping with locally native California species, and installing water-efficient and targeted irrigation systems (such as drip irrigation). Information on drought-tolerant landscaping and water-efficient irrigation systems is available on California's Save our Water website: <http://saveourwater.com/what-you-can-do/tips/landscaping/>

Department Conclusions and Further Coordination

The Department appreciates the opportunity to comment on the IS/MND for the Sam-Redlands Tract. We recommend that the City address the Department's comments and concerns prior to adoption of the MND.

If you should have any questions pertaining to the comments provided in this letter, and to schedule a meeting, please contact Edith Martinez at (909) 944-0187 or at Edith.Martinez@wildlife.ca.gov.

Mitigated Negative Declaration
Sam-Redlands Tract
SCH No. 2017011069
Page 5 of 5

Sincerely,

For 
Leslie MacNair
Regional Manager



Department of Public Works

- Flood Control
- Operations
- Solid Waste Management
- Surveyor
- Transportation

Gerry Newcombe
Director

February 23, 2017

City of Redlands
 Development Services Department
 Lorelee Farris, Principal Planner
 P.O. Box 3005
 Redlands, CA. 92373
lfarris@cityofredlands.org

File: 10(ENV)-4.01

RE: NOTICE OF AVAILABILITY OF A MITIGATED NEGATIVE DECLARATION FOR TENTATIVE TRACT 19942 FOR THE CITY OF REDLANDS

Ms. Farris:

Thank you for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. **We received this request on January 30, 2017** and pursuant to our review, the following comments are provided:

General Comment

- 3-1 1. Since this project is adjacent to the San Bernardino County Flood Control District's (District) Zanja Creek facility, any work affecting the District right-of-way would need a Flood Control Permit. Also, any work affecting the Count of San Bernardino Maintained Road System right-of-way would need a Transportation Permit. For further information, please contact Melissa Walker in the Permits/Operations Support Division at 909-387-7995.
- 3-2 2. We are aware there may be storm drains in and around the site that may be affected by the proposed project. When planning for or altering existing or future storm drains, be advised that the Project is subject to the District's Comprehensive Storm Drain Plan No. 4, dated May 1975, with updated hydrology dated February 2013. The responsible agency should review and approve any changes to the existing drainage. If you have any questions, please contact David Lovell in the Flood Control Planning Division at 909-387-8120.
- 3-3 3. The levee tops, and therefore the proposed project area, may be within the jurisdiction of the California Department of Fish and Wildlife (CDFW). A permit, or documentation, from CDFW stating a permit is not required will be requested prior to the issuance of a District encroachment permit. If you have any questions, please contact Patrick Egle in the Environmental Management Division at 909-387-1865.

BOARD OF SUPERVISORS

ROBERT A. LOVINGOOD
Chairman, First District

JANICE RUTHERFORD
Second District

JAMES RAMOS
Third District

CURT HAGMAN
Vice Chairman, Fourth District

JOSE GONZALES
Fifth District

GREGORY C. DEVEREAUX
Chief Executive Officer

Water Resources Division (Mary Lou Mermilliod, PWE III, 909-387-8213):

- 3-4
1. According to the most recent FEMA Flood Insurance Rate Map, Panel 06071C8717H, dated August 28, 2008, the majority of the project lies within Zone X-shaded, with the southern-most portion within Zone AE and the Regulatory Floodway. This should be stated in the Final IS/MND.

Environmental Management Division (Patrick Egle, Planner III, 909-387-1865):

- 3-5
1. San Bernardino Kangaroo Rat (*Dipodomys merriami parvus*) (SBKR) has been known to occupy and thrive in small isolated patches of orange groves. We believe the Initial Study does not adequately support the conclusion that no suitable habitat for federally endangered or threatened species was documented within the Project site. The Final/Adopted IS/MND should analyze and discuss any impact to this species in detail.
 2. The Biological Resources Study does not identify Los Angeles pocket mouse (*Perognathus longimembris brevinasus*), a state species of concern, as occurring within the region and being potentially impacted by this project. The Final/Adopted IS/MND should address all biological resources impacts and contain any mitigation necessary to reduce impacts to this species to a less than significant level.
 3. We recommend protocol trapping for SBKR, Northwestern San Diego pocket mouse and Los Angeles pocket mouse be conducted to support the Initial Studies determination of no suitable habitat. The Final/Adopted IS/MND should address all biological resources impacts and contain any mitigation necessary to reduce impacts to a less than significant level.
 4. We believe the Initial Study does not adequately address project impacts to burrowing owl. The Final/Adopted IS/MND should address all biological resources impacts and contain mitigation necessary to reduce impacts to a less than significant level. Mitigation Measure BIO-2 identifies a minimum exclusion buffer of 100 feet. The mitigation measure should be revised to include appropriate exclusion buffers as identified in the Staff Report on Burrowing Owl Mitigation which was published by the State of California Natural Resources Agency Department of Fish and Game, March 7, 2012.
 5. Additionally, the document does not address issues associated with potential trail usage by pedestrians with pets. Domesticated dogs and their fecal matter represent one of the largest unregulated sources of aquatic fecal contaminants with zoonotic potential in areas impacted by urban runoff." - Green et. al. *Environ. Sci. Technol.*, 2014, 48 (19), pp 11453–11461. While the Water Quality Study provides a County pamphlet at the end of the document, the IS/MND lacks necessary discussion and potential mitigation measures to address this impact of trails along waterways.

Please note: If a new avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance impact, the lead agency is required to recirculate the negative declaration accordance with CEQA Guidelines Section 15073.5.

L. Farris, City of Redlands
NOA of a MND for Tentative Tract 19942
February 23, 2017
Page 3 of 3

We respectfully request to be included on the circulation list for all project notices, public reviews, or public hearings. In closing, I would like to thank you again for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. Should you have any questions or need additional clarification, please contact the individuals who provided the specific comment, as listed above.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael R. Perry".

Michael R. Perry
Supervising Planner
Environmental Management

MRP:PE:sr



February 27th, 2017

Mr. Raymond Dorame
Executive Vice President
MasterCraft Homes Group
20201 SW Birch St., Suite 100
Newport Beach, CA 92660

Re: Response to Comments to California Department of Fish and Wildlife and San Bernardino County Department of Public Works Review of Initial Study/Mitigated Negative Declaration – State Clearinghouse No. 2017011069. Tentative Tract 19942 Residential Development Project, City of Redlands Sphere of Influence, Unincorporated San Bernardino County, California:

Dear Mr. Dorame:

The following letter summarizes responses to those biological resources comments submitted by the California Department of Fish and Wildlife (CDFW) "*Initial Study and Mitigated Negative Declaration – Sam-Redlands Tract (Annex 94, Zone Change 454, TT 19942, Demolition Permit No. 258) – State Clearinghouse No. 2017011069*" (February 27th, 2017), and San Bernardino County Department of Public Works "*Notice of Availability of a Mitigated Native Declaration for Tentative Tract 19942 for the City of Redlands*" (February 23rd, 2017) to Ms. Lorelee Farris, City of Redlands.

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

Comment 1: Bats *"The Department appreciates that the IS/MND has addressed potential impacts to bats. To increase the specificity and enforceability of Mitigation Measure (MM) B10-1 the Department recommends that the City revise MM B10-1 and condition the measure to include the following:"* (CDFW 2017)

Response 1: MM B10-1 will be updated as recommended by CDFW.

Mitigation Measure B10-1: A detailed bat survey shall be conducted by a qualified bat biologist prior to site preparation or ground-disturbing activities, including, but not limited to demolition of on-site structures and/or the removal of trimming of mature trees and palms. Any locations with potential for roosting or suitable as a maternity roost will be surveyed by the qualified bat biologist using an appropriate combination of structure inspection, exit counts, and acoustic surveys. Surveys shall be conducted during the appropriate season and time of day/night to ensure detection of bats. If bats are found using any structures or trees within the project area, the qualified bat biologist shall identify the bats to the species level, and evaluate the colony to determine its size and significance. The bat survey shall include: 1) the exact location of all roosting sites (location shall be adequately described and drawn on a map); 2) the number of bats present at the time of visit (count or estimate); 3) each species of bat present shall be named (include how the species was identified); and 4) the type of roost, i.e., a night roost (rest at night while out feeding) versus a day roost (resting during the day). A report containing the bat survey findings shall be submitted to the City and to the Department of Fish and Wildlife (Department), at the following address: 3602 Inland Empire Blvd., Suite C-220, Ontario, CA 91764.

If a roosting site and/or maternity colony(s) is detected, and the qualified bat biologist determines that impacts (either direct or indirect, including disturbance from noise, vibration, dust, exhaust) from project-related activities may occur, the Applicant shall consult with the Department to determine the most appropriate type of avoidance, minimization, and mitigation measures to implement. Examples of avoidance and minimization strategies may include daily work timing restrictions and buffer distances. Work timing restrictions and buffer distances will be determined based on the expert opinion of the qualified bat biologist, as approved by the Department. Mitigation measures may include replacement of impacted roosting sites with alternate roosting structures. Alternate roosting structures shall be designed to ensure use by bats impacted by the project. For example, designs will take into consideration the thermal and crevice/structure roosting requirements of the impacted bats. Removal of structures, and/or the removal or trimming of trees, and palms occupied by bats shall not occur during the bat maternity season, typically March 15 through September 15.

Comment 2: Burrowing Owl and Nesting Birds *"The Department recommends that the City revise MM BIO-2 and condition the measure to include the following:"* (CDFW 2017)

Response 2: MM BIO-2 will be updated as recommended by CDFW.

Mitigation Measure BIO-2: A qualified biologist shall conduct a burrowing owl and nesting bird survey(s) no more than three days prior to initiation of project-related activities to document the presence or absence of nesting birds within or directly adjacent (500 feet) to the project site. The survey(s) shall focus upon identifying any raptor and/or passerine nests that may be directly or indirectly affected by project-related activities. If active burrowing owl or other avian nests are documented, species-specific measures shall be prepared by a qualified biologist and implemented to prevent abandonment of the active nest. At a minimum, disturbances in the vicinity of a nest shall be postponed until the young have fledged. A minimum exclusion buffer of 100 feet shall be maintained during construction, depending upon the species and location. The perimeter of the best setback zone shall be fenced or adequately demarcated with stakes and flagging at 20-foot intervals, and construction personnel and activities restricted from the area.

SAN BERNARDINO COUNTY DEPARTMENT OF PUBLIC WORKS ENVIRONMENTAL MANAGEMENT DIVISION

Comment 1: *"San Bernardino Kangaroo Rat (*Dipodomys merriami parvus*) (SBKR) has been known to occupy and thrive in small isolated patches of orange groves. We believe the Initial Study does not adequately support the conclusion that no suitable habitat for federally endangered or threatened species was documented within the project site. The Final/Adopted IS/MND should analyze and discuss any impact to this species in detail."* (County of San Bernardino Department of Public Works 2017).

Response 1: No characteristic kangaroo rat sign including burrows, scat, dust bowls or tail drags were documented within the project site. The project site was initially surveyed and documentation prepared by Ruben Ramirez who possesses a United States Fish and Wildlife Service (USFWS) and CDFW permit to conduct focused trapping for the San Bernardino kangaroo rat (780566-13, CDFW GSC 002243) (Cadre Environmental 2016).

This San Bernardino kangaroo rat is primarily found on sandy loam substrates, characteristic of alluvial fans and floodplains (USFWS 1994). These habitats are generally dominated by alluvial

scrub vegetation, which consists of chaparral and sage scrub species. No native vegetation or suitable soils were documented within or adjacent (Mill Creek Zanja) to the project site. Although, the San Bernardino kangaroo rat has been documented in small patches of orange groves, these observations are primarily located within the terrace habitats adjacent to occupied floodprone areas (Santa Ana River wash). The project site is located approximately 2 miles south of the Santa Ana River and is not located within USFWS designated critical habitat for the species. The species is not expected to occur onsite.

Comment 2: *"The Biological Resources Study does not identify Los Angeles pocket mouse (*Perognathus longimembris brevinasus*), a state species of concern, as occurring within the region and being potentially impacted by this project. The Final/Adopted IS/MND should address all biological resources impacts and contain any mitigation necessary to reduce impacts to this species to a less than significant level."* (County of San Bernardino Department of Public Works 2017).

Response 2: The project site was initially surveyed and documentation prepared by Ruben Ramirez who possesses experience and USFWS and CDFW permits to conduct focused trapping for the genus *Perognathus* (780566-13, CDFW GSC 002243) (Cadre Environmental 2016). Specifically, Ruben Ramirez possess a USFWS permit to conduct focused trapping for the federally endangered subspecies Pacific pocket mouse (*Perognathus longimembris pacificus*).

The Los Angeles pocket mouse, described by Osgood in 1900, is a little-known subspecies of the widespread little pocket mouse. The little pocket mouse relies mostly on grass seeds as a food source and prefers to inhabit open ground of finely sandy composition. It is restricted to lower elevation grassland, alluvial sage scrub, and coastal sage scrub in cismontane southern California. No native vegetation or suitable soils were documented within or adjacent (Mill Creek Zanja) to the project site. Based on the fact that no suitable conditions occur onsite for the species and the closest known occurrence to the project site is within the Santa Ana River floodprone area (5.5 miles north west), the species was not addressed. The species is not expected to occur onsite.

Comment 3: *"We recommend protocol trapping for SBKR, Northwestern San Diego pocket mouse and Los Angeles pocket mouse be conducted to support the Initial Studies determination of no suitable habitat. The Final/Adopted IS/MND should address all biological resources impacts and contain any mitigation necessary to reduce impacts to a less than significant level."* (County of San Bernardino Department of Public Works 2017).

Response 3: Based on the initial site assessment conducted by Ruben Ramirez, a USFWS/CDFW permitted biologist for San Bernardino Kangaroo Rat and genus *Perognathus*, the complete lack of suitable habitat (soils and vegetation) for these species including the Northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*), a focused trapping effort is not warranted.

Comment 4: *"We believe the Initial Study does not adequately address project impacts to burrowing owl. The Final/Adopted IS/MND should address all biological resources impacts and contain mitigation necessary to reduce impacts to a less than significant level. Mitigation Measure B10-2 identifies a minimum exclusion buffer of 100 feet. The mitigation measure should be revised to include appropriate exclusion buffers as identified in the Staff Report on Burrowing Owl Mitigation which was published by the State of California Natural Resources Agency"*

Department of Fish and Game, March 7, 2012." (County of San Bernardino Department of Public Works 2017).

Response 4: MM BIO-2 will be updated to adequately address the burrowing owl as recommended by CDFW and the County of San Bernardino Department of Public Works.

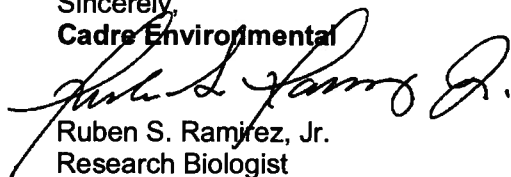
Mitigation Measure BIO-2: A qualified biologist shall conduct a burrowing owl and nesting bird survey(s) no more than three days prior to initiation of project-related activities to document the presence or absence of nesting birds within or directly adjacent (500 feet) to the project site. The survey(s) shall focus upon identifying any raptor and/or passerine nests that may be directly or indirectly affected by project-related activities. If active burrowing owl or other avian nests are documented, species-specific measures shall be prepared by a qualified biologist and implemented to prevent abandonment of the active nest. At a minimum, disturbances in the vicinity of a nest shall be postponed until the young have fledged. A minimum exclusion buffer of 100 feet shall be maintained during construction, depending upon the species and location. The perimeter of the best setback zone shall be fenced or adequately demarcated with stakes and flagging at 20-foot intervals, and construction personnel and activities restricted from the area.

Comment 5: *"Additionally, the document does not address issues associated with potential trail usage by pedestrians with pets. Domesticated dogs and their fecal matter represent one of the largest unregulated sources of aquatic fecal contaminants with zoonotic potential in areas impacted by urban runoff." -Green et. al. Environ. Sci. Technol., 2014, 48 (19), pp 11453-11461. While the Water Quality Study provides a County pamphlet at the end of the document, the IS/MND lacks necessary discussion and potential mitigation measures to address this impact of trails along waterways.*" (County of San Bernardino Department of Public Works 2017).

Response 5: The proposed trail will be owned and maintained by the City of Redlands and to help reduce the impact of fecal matter on the Mill Creek Zanja, the City of Redlands should consider the installation of a Dog Waste Bag Dispenser and Trash Bin at the entrance of the trail. The City should also consider installing a dog waste sign urging the proper pick up and disposal of dog fecal matter.

Sincerely,

Cadre Environmental



Ruben S. Ramirez, Jr.
Research Biologist

USFWS Permit 780566-13
CDFW GSC Permit 002243

ENVIRONMENTAL CHECKLIST FORM

1. **Project Title:** Annexation No. 94 (LAFCO 3207), Zone Change No. 454, Tentative Tract No. 19942, and Demolition Permit No. 258.

2. **Lead Agency Name and Address:**
City of Redlands
Community Development Department
35 Cajon Street, Suite 20
PO Box 3005
Redlands, CA 92373

3. **Contact Person and Phone Number:**
Loralee Farris, Principal Planner
35 Cajon Street, Suite 20
P.O. Box 3005
Redlands, CA 92373

4. **Project Location:** The project is located in the unincorporated area of the County of San Bernardino north of Sylvan Boulevard and east of Wabash Avenue. Assessor's Parcel Numbers (APN's): 0299-011-11 and 0299-011-12.

5. **Project Sponsor's Name and Address:** Sam-Redlands LLC, Mastercraft Homes Group, 20201 Birch Street, Suite 100, Newport Beach, CA. 92660.

Applicant's Representative: Patrick J. Meyer, Urban Environs, 1345 Fountain Place, Redlands, CA. 92373. Phone: 909/798-4446. Email:environs@verizon.net.

6. **General Plan Designation:** **Existing** - Rural Living (RL) - 5 Acre Minimum Parcel Size (County of San Bernardino General Plan). **Proposed** - Low Density Residential (LDR) 0-6 dwelling units per acre (City of Redlands General Plan).

7. **Zoning:** **Existing** - RL-5: Rural Living, 5 acre Minimum Parcel Size (County of San Bernardino); **Proposed** - R-1 Low Density Residential, 7200 square feet minimum lot size. (City of Redlands).

8. **Description of Project:** Entitlement actions include: 1) Approval of a proposed annexation of approximately 11.97 acres from the unincorporated area of the County of San Bernardino into the boundaries of the City of Redlands, 2) Approval of a proposed Zone Change to pre-zone approximately 11.97 acres to be annexed from (RL-5) Rural Living (County of San Bernardino) to the Single-Family Residential (R-1) District (City of Redlands), 3) Approval of Tentative Tract Map No. 19942 to subdivide approximately 11.97 acres into thirty four (34) single family residential lots and four (4) lettered lots, and 4) Approval of a Demolition Permit to allow removal of one existing residential structure on the subject site, two commercial buildings, one carport, and one garage and shed.

Proposed residential lot areas would vary from approximately 7,200 – 16,450 square feet

and would average approximately 8,990 square feet in area. The proposed gross density is 2.84 dwelling units (du) per acre, and the proposed net density is 2.89 du/acre. Approximately 1.97 acres or 16% of the project site will be open space, including public landscape areas and a flood detention basin. All streets are proposed to be public streets and the community will not be gated.

Pursuant to Redlands Municipal Code Section 16.60.030, as a condition of receiving water and/or sewer connections to the city's water and sewerage system, unincorporated parcels contiguous to the City of Redlands boundaries are required to annex into the City of Redlands. As the proposed development would need to connect to these systems, the applicant has concurrently submitted a request for annexation into the City of Redlands. To ensure compliance with the Local Agency Formation Commission requirements for annexing unincorporated parcels into the City of Redlands, the project site must be contiguous to the City of Redlands boundaries.

9. **Surrounding Land Uses and Setting:** The project site is surrounded by single family residential use to the north and east, to the west by Wabash Avenue and an institutional (school) use, and to the south by the Mill Creek Zanja and Sylvan Boulevard. A mix of rural residential and agricultural uses is located across Sylvan Boulevard to the south and east.

10. **Other public agencies whose approval is required:** Local Agency Formation Commission (LAFCO)

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.

- | | | |
|--|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Population and Housing |
| <input checked="" type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Hazards/Hazardous Materials | <input checked="" type="checkbox"/> Public Services |
| <input checked="" type="checkbox"/> Air Quality | <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Land Use and Planning | <input checked="" type="checkbox"/> Transportation/Circulation |
| <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Utilities and Service Systems |
| <input type="checkbox"/> Geology and Soils | <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION:

On the basis of this initial evaluation:

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

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

I find that the 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 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 Project, nothing further is required.



Loralee Farris
Principal Planner
City of Redlands
March 6, 2017

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g. the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g. the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an 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 Section XVII, "Earlier Analyses," 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 Analyses 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 significance.

Issues:

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

I. **AESTHETICS.** Would the project:

a) Have a substantial adverse effect on a scenic vista?	—	—	—	<u>X</u>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	—	—	—	<u>X</u>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	—	—	<u>X</u>	—
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	—	—	<u>X</u>	—

AESTHETICS

- I.a) The proposed project abuts residential development to the north and east and a mix commercial and institutional uses to the west, thus will not significantly stand out from surrounding development. The R-1 (Single Family Residential) District provides for a maximum building height of thirty five feet (35') and two and one half (2½) stories, which is similar to heights of surrounding residential structures. The scenic views of the San Bernardino Mountains to the north and of San Gorgonio mountain to the east, will still be visible above any structures constructed within the proposed project, as the mountain views far exceed the maximum structure height of the proposed zoning district. However, the subdivision will alter views of the citrus groves on the property, which are proposed to

be removed to accommodate the residential tract. Therefore, through implementation of no more than the maximum structure heights and the project's landscaping plan, the impact to scenic vistas would be less than significant.

- I.b) The proposed project will not damage scenic resources, including trees, rock outcroppings, or historic buildings within a state scenic highway. Caltrans identifies two eligible scenic highways within five miles of the proposed project site, the segment of State Route 210 between Interstate 10 and State Route 330, and State Route 330, which begins at the base of the San Bernardino Mountains, and travels through the San Bernardino Mountains. These highways are identified as "eligible, not officially designated. The subject site is not located in proximity to either of these highways.
- I.c) Implementation of the proposed project will alter the current agricultural/rural visual character of the project site to low density single family land use. The project will add 34 single family lots to the area. Single family residential use exists to the north and east of the project site, as well as further to the west. Proposed lot elevations along property lines abutting existing residential development to the north and east vary from approximately 0 feet to 10 feet below the grade of adjacent development. As a result, adjacent residential uses will not experience visual intrusion any greater than already exists with their existing neighbors, although the visual character of "views" from the rear of these properties will be altered. The project site is located immediately adjacent to the easterly corporate boundary of the City of Redlands and represents an extension of the established low density residential pattern in the project vicinity. Consequently, the proposed project will not substantially degrade the existing visual character or affect the quality of the site and its surroundings.
- I.d) Implementation of the proposed project will create new sources of light or glare typical of low density single family development. As has been noted, the surrounding area is currently developed in similar land uses to the north, east and west. Lighting would be used for illumination of new streets for safety purposes. Construction of single family residences also typically involves porch and threshold lighting at entrances, exits, pathways, and parking areas. Such lighting would be similar in nature to surrounding residential ambient day and nighttime illumination from surrounding urbanization in the area. While the proposed project will create new sources of light and glare, impacts are not expected to be significant with compliance to applicable City standards. The City of Redlands Municipal Code requires that outdoor lighting be shielded such that it will minimize light spillage to adjacent properties. The proposed project will also incorporate street trees, decorative landscaping, architectural features, and other streetscape design techniques that will contribute to minimizing light spillage onto neighboring areas. Additionally, through adherence to applicable City standards, the proposed project would not utilize high gloss or reflective materials that would cause glare or reflection or generate excessive light. In consideration of the preceding factors, a less than significant impact would occur. No mitigation is required

Issues:

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

II. **AGRICULTURE AND FOREST RESOURCES.** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

a). Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

—	<u>X</u>	→	—
---	----------	---	---

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

—	—	—	<u>X</u>
---	---	---	----------

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))?

—	—	—	<u>X</u>
---	---	---	----------

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

—	—	—	<u>X</u>
---	---	---	----------

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

Issues:

land to non-forest use?

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
—	—	<u>X</u>	—

AGRICULTURE AND FOREST RESOURCES

II.a) The project site is partially occupied by a citrus orchard, which has existed for several decades. Aerial photographs indicate the presence of groves on the property back to at least 1938, however, aerial photographs illustrate the removal of grove area on the property between 1980 and 2005, to accommodate the establishment of an equipment yard. Presently, approximately 5.5 acres of groves on the 11.97 acre site remain on the southern and western areas of the project site. Farmland maps are compiled by the California Department of Conservation, Farmland Mapping and Monitoring Program (FMMP). These maps utilize data from the United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) soil survey and land use information to inventory agricultural resources. The City contains approximately 1,357 acres of land classified by the FMMP as Prime, Statewide or Local Important, or Unique Farmland, with another 1,837.1 acres located within the City’s Sphere of Influence. The FMMP designates the southern and western portion of the site, presently planted with citrus groves, as “Prime Farmland”. This area encompasses approximately 5.5 acres of the project site. However, the portion of the project site, located at the north and eastern areas of the site, where groves have been removed for the previous equipment yard use, are designated as “Urban and Built-Up Land”. The proposed project will convert this remaining Prime Farmland to non-farmland use. The project site is currently zoned for residential use, under the Rural Living (RL) 5-Acre Minimum District in the County of San Bernardino and within the Rural Living residential designation of the City of Redlands General Plan. The project includes a Zone Change to pre-zone 11.97 acres to the R-1 (Single Family Residential) zone. Further, the area in the vicinity of the project site has changed over time from agricultural to residential uses. Increasing prices of land, higher water and labor costs, competition from other parts of the state, increased environmental regulations, and the expansion of urbanization have all put considerable pressure on farming as an economically viable use within the area. The project site is bounded on two sides by residential development and the existing agricultural use represents a fragmented portion of citrus groves, non-contiguous with other citrus orchards located further east in the unincorporated area of Crafton. A minor arterial roadway (Wabash Avenue) exists at the west boundary of the project site and a local street (Sylvan Boulevard) at the south boundary of the project site. Thus, this parcel should be considered a small island of agricultural land that does not have long-term viability regardless of the current development proposal. Based on these constraints, **Mitigation Measure AGR-1** is adequate to offset the removal of this parcel of land from agricultural productivity. The City of Redlands concludes that implementation of this measure provides reasonable mitigation based on the magnitude of the impact pursuant State CEQA Guidelines Section 15370. :

Mitigation Measure AGR-1: The project developer shall fund acquisition of farmland or farmland conservation easements at a ratio of 0.50/1. Based on the

5.5 agricultural acre area of the 11.97 acre project site, a total of 2.75 acres of prime agricultural land or conservation easements over 2.75 acres of prime agricultural land shall be acquired and permanently protected. The prime agricultural land or the conservation easement shall be acquired and made available to an existing farmland trust or comparable organization prior to issuance of a grading permit, or a farmland trust or comparable organization shall verify that it has received sufficient funds to acquire prime agricultural land or a conservation easement over such lands. The project developer shall submit verification to the City of Redlands Development Services Department that the acquisition of farmland has been completed. A receipt from the farmland conservation agency will serve as adequate verification.

- II.b) The Williamson Act is a non-mandated State program, administered by counties and cities, for the preservation of agricultural land. Participation in the program is voluntary on the part of both landowners and local governments, and is implemented through the establishment of Agricultural Preserves and the execution of Williamson Act contracts. The project site is not located within a Williamson Act contract area, pursuant to the 2015/2016 San Bernardino County William Act Map, Sheet 2 of 2, maintained by the California State Department of Conservation, Division of Land Resource Projection; therefore, no impact would occur. No mitigation is required.
- II.c) The proposed project site is not located in an area considered forest land or zoned for any forestry uses. Forest land is defined by the California Public Resources Code (PRC Section 12220[g]) as land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. The project site abuts existing residential development on the north, and east. No impact would occur and no mitigation is required.
- II.d) There are no forest resources on the project site or in proximity. Consequently, implementation of the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use.
- II.e) The project consists of an annexation of 11.97 acres into the City of Redlands, a Zone Change to pre-zone the property area as R-1 (Single Family Residential) District, and a Tentative Tract Map to subdivide the property into thirty-four residential lots and four lettered lots. Residential use on five acre lots is permitted under the current zoning district, the Rural Living – 5 Acre Minimum District, in the unincorporated county of San Bernardino. One single family residence exists on-site and will be demolished with the proposed project. The proposal would facilitate a density for residential higher under the County of San Bernardino’s zoning designation, but consistent with the City of Redlands’ current General Plan designation for the property of Low Density Residential (0-6 units per gross acre). The citrus groves on the property represent a fragmented and noncontiguous area of citrus orchards, surrounded by residential development on two sides and by a minor arterial on the west, and a local street on the south. The project site abuts an institutional use to the west.

Subdivision of the subject site into thirty-four residential lots is consistent with the residential context of the adjacent area. The area to the west of the project site has been urbanized and developed into a mix of commercial, institutional and residential uses, and the project will represent an extension of that urbanization. As such, the project would not have a direct impact on the conversion of farmland to non-agricultural use. Any indirect impact, over time, due to the expansion of residential development within area, related to this project, would be less than significant. Any future development proposals in adjacent areas would require a similar analysis under CEQA.

Issues:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. <u>AIR QUALITY.</u> Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	—	—	<u>X</u>	—
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	—	—	<u>X</u>	—
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	—	—	<u>X</u>	—
d) Expose sensitive receptors to substantial pollutant concentrations?	—	—	<u>X</u>	—
e) Create objectionable odors affecting a substantial number of people?	—	—	<u>X</u>	—

AIR QUALITY

An Air Quality Impact Analysis has been prepared for the proposed project by the firm Urban Crossroads. Findings are summarized in the following sections. Please refer to the Appendix for additional detail including description of study methodology, the air quality setting, air quality standards, regulatory background, and detailed emissions model outputs.

- III.a) Adoption of the proposed project will not conflict or obstruct implementation of the regional Air Quality Management Plan (AQMP). The project would not result in or cause either national air quality standards (NAAQS) or California Air Quality Standards (CAAQS) violations. The project's proposed land use designation is allowed within the Redlands General Plan Land Use Element. The project is therefore considered to be consistent with the AQMP.
- III.b) Land uses such as the proposed project affect air quality through construction-source and operational source emissions. Peak operational-source emissions (without mitigation) from the proposed project have been calculated to not exceed applicable South Coast Air Quality Management District (SCAQMD) regional thresholds of significance. Construction related emissions (without mitigation) have also been calculated to not exceed SCAQMD's localized significance thresholds. In addition, localized impacts (carbon monoxide "hot spots") due project related to mobile-source emissions have been determined to be less than significant. As has been noted, development consistent with the City of Redlands General Plan Update is considered to be consistent with the South Coast Air Quality Management Plan (AQMP). In summary, implementation of the proposed project will not violate any air quality standard or substantially contribute to an existing or projected air quality violation. Please refer to the Appendix for additional discussion.

Project-related long-term air quality impacts, as indicated above, would not be significant and no mitigation measures would be required. Short-term impacts related to construction would be mitigated with compliance with SCAQMD Rule 403 guidelines to ensure that potential short-term air quality impacts on nearby sensitive receptors will be less than significant. Mitigation Measure AQ-1 has been added to reinforce compliance with these requirements.

AQ-1 The project is required to comply with regional rules that assist in reducing short-term air pollutant emissions, including SCAQMD Rule 403, which requires that fugitive dust be controlled with best-available control measures. SCAQMD Rule 403 requires implementation of dust-suppression techniques to prevent fugitive dust from creating a nuisance off site. Applicable dust suppression techniques from Rule 403 include watering active sites at least twice daily; covering all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 2 feet of freeboard (vertical space between the top of the load and top of the trailer) in accordance with the requirements of California Vehicle Code (CVC) Section 23114; and controlling traffic speeds within the property to 15 mph or less.

- III.c) The project site is located in a designated non-attainment area for ozone and particulate matter (PM₁₀ and PM_{2.5}). The SCAQMD has recognized that there is insufficient information to quantitatively evaluate the cumulative contributions of multiple projects because each project applicant has no control over nearby projects. Individual projects that do not generate operational or construction emissions that exceed the SCAQMD's recommended daily thresholds for project specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment. Implementation of the proposed project will not result in a cumulatively considerable increase of any criteria pollutant within the South Coast Air Basin (SCAB) that

is presently in nonattainment under federal or state ambient air quality standards. Please refer to the Appendix for additional discussion.

III.d) Implementation of the proposed project will not result in the exposure of sensitive receptors to pollutants. Sensitive receptors can include uses such as long term health care facilities, rehabilitation centers, and retirement homes. Residences, schools, playgrounds, child care centers, and athletic facilities can also be considered as sensitive receptors. Results of the air quality analysis indicate that the proposed project would not exceed the SCAQMD localized significance thresholds during construction. Therefore sensitive receptors would not be subject to a significant air quality impact during project construction. The proposed project has also been determined to not result in a CO “hotspot” as a result of project related traffic during ongoing operations, nor would the project result in a significant adverse health impact as discussed in the Appendix. In consideration of the preceding factors, a less than significant impact to sensitive receptors during long term operational activity is anticipated.

III.e) Implementation of the proposed project would not result in the creation of objectionable odors that would affect a substantial number of people. The Project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities as well as temporary storage of typical solid waste (refuse) associated with residential uses.

Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and thus are considered less than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City’s solid waste regulations. The proposed Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed project construction and operations would be less than significant and no mitigation is required.

<u>Issues:</u>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
-----------------------	--------------------------------------	--	---------------------------------------	--------------

IV. **BIOLOGICAL RESOURCES.** Would the project:

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

— X → —

b) Have a substantial adverse effect on any

Issues:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	—	<u>X</u>	→	—
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	—	—	—	<u>X</u>
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?	—	<u>X</u>	→	—
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	—	—	—	<u>X</u>
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?	—	—	—	<u>X</u>

BIOLOGICAL RESOURCES

A Biological Resources Habitat Assessment, including a reconnaissance level field investigation, has been prepared for the proposed project by the firm of Cadre Environmental, which details the study methodology, discussion of field investigations, and detailed description of potential biological impacts. Findings are summarized in the following Section.

- IV.a) The project site is partially occupied by citrus grove, located on the southern and western portions of the project site, and disturbed, developed area located to the north and eastern portion of the site, which contains two commercial buildings and two accessory structures, which was previously utilized as an equipment yard, and a single family residence. No native vegetation communities or undisturbed soils are present on-site. As such, suitable habitat for sensitive plant or wildlife species of any kind is extremely limited to non-existent. Field investigations did not identify any endangered, threatened, candidate, sensitive or special status species present on-site, although sensitive bat species such as the pallid bat and the western yellow bat may occasionally roost within groves and

abandoned farm structures, and mature trees may occasionally serve as nesting sites for some sensitive raptor species, such as Cooper's Hawk. The following mitigation measures will ensure that potential impacts to sensitive bat and raptor species are less than significant and ensure consistency with plans, policies and regulations of the California Department of Fish and Game or U.S. Fish and Wildlife Service.

Mitigation Measure BIO-1: A detailed bat survey shall be conducted by a qualified bat biologist prior to site preparation or ground-disturbing activities, including, but not limited to demolition of the on-site structures and/or the removal or trimming of mature trees and palms. Any locations with potential for roosting or suitable as a maternity roost will be surveyed by the qualified bat biologist using an appropriate combination of structure inspection, exit counts, and acoustic surveys. Surveys shall be conducted during the appropriate season and time of day/night to ensure detection of bats. If bats are found using any structures or trees within the project area, the qualified bat biologist shall identify the bats to the species level, and evaluate the colony to determine its size and significance. The bat survey shall include: 1) the exact location of all roosting sites (location shall be adequately described and drawn on a map); 2) the number of bats present at the time of visit (count or estimate); 3) each species of bat present shall be named (include how the species was identified); and 4) the type of roost (resting during the day). A report containing the bat survey findings shall be submitted to the City and to the Department of Fish and Wildlife (Department), at the following address: 3602 Inland Empire Blvd., Suite C-220, Ontario, CA 91764.

If a roosting site and/or maternity colony(s) is detected, and the qualified bat biologist determines that impacts (either direct or indirect, including disturbance from noise, vibration, dust, exhaust) from project-related activities may occur, the Applicant shall consult with the Department to determine the most appropriate type of avoidance, minimization, and mitigation measures to implement. Examples of avoidance and minimization strategies may include daily work timing restrictions and buffer distances. Work timing restrictions and buffer distances will be determined based on the expert opinion of the qualified bat biologist, as replacement of impacted roosting sites with alternate roosting structures. Alternate roosting structures shall be designed to ensure use by bats impacted by the project. For example, designs will take into consideration the thermal and crevice/structure roosting requirements of the impacted bats. Removal of structures and/or the removal or trimming of trees, and palms shall not occur during the bat maternity season, typically March 15 through September 15.

Mitigation Measure BIO-2 : A qualified biologist shall conduct a burrowing owl and nesting bird survey(s) no more than three days prior to initiation of project-related activities to document the presence or absence of nesting birds within or directly adjacent (500 feet) to the project site. The survey(s) shall focus upon identifying any raptor and/or passerine nests that may be directly or indirectly affected by construction activities. If active burrowing owl or other avian nests are documented, species-specific measures shall be prepared by a qualified biologist and implemented to prevent abandonment of the active nest. At a minimum, disturbances in the vicinity of a nest shall be postponed until the young birds have

fledged. A minimum exclusion buffer of 100 feet shall be maintained during construction, depending upon the species and location. The perimeter of the nest setback zone shall be fenced or adequately demarcated with stakes and flagging at 20-foot intervals, and construction personnel and activities restricted from the area.

Mitigation Measure BIO-3: A survey report by a qualified biologist verifying that no active raptor and/or passerine nests are present, or that the young have fledged, shall be submitted to the City of Redlands prior to initiation of grading in the nest setback zone. The qualified biologist shall serve as a construction monitor during those periods when construction activities occur near active nest areas to ensure that no inadvertent impacts on these nests occur.

- IV.b) There is no riparian habitat located within the project site. However, the Mill Creek Zanja is located immediately south of the project area. Project related storm run-off is proposed to be discharged into an on-site filtration basin. Major flood events (100 year flood or greater) would, however, discharge into the Zanja. In order to ensure that the proposed project will not directly or indirectly impact the Mill Creek Zanja, mitigation measures are recommended. Please refer to Section IX of this Mitigated Negative Declaration for further discussion of hydrology and water quality impacts. In summary, implementation of the proposed project would not have an adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service, with recommended mitigation outlined.

Mitigation Measure BIO-4: A monitoring biologist experienced in identifying jurisdictional resources regulated by the United States Army Corp of Engineers, California Department of Fish and Wildlife and Regional Water Quality Control Board shall define the location and monitor the installation of orange silt fencing between the Mill Creek Zanja and the Project Site as described below:

- a. Install siltation fencing at least 10 ft. north of the Mill Creek Zanja along the entire southern extent of the Project Site. The fencing will be buried at least 4 inches in depth and will also be secured in place by a continuous line of sandbags. The orange silt fencing will serve both as a sediment barrier as well as a highly visible feature between the construction area and Mill Creek Zanja.
- b. Siltation fencing shall be tied into existing bridge crossings currently utilized by residents to allow for continued access to their properties.
- c. No staging of materials or soils shall occur within 50 ft. of the siltation fencing.
- d. Any breaches in the silt fencing will be repaired immediately.

- e. Any direct/indirect impacts to the Mill Creek Zanja would be reported immediately to the City of Redlands.
- f. Following completion of construction, the monitoring biologist will provide the City of Redlands a letter of compliance with all conservation and avoidance measures implemented to ensure protection of the Mill Creek Zanja.

IV.c) There are no wetlands or vernal pools located within the project area. Thus, implementation of the proposed project will not have an adverse effect on federally protected wetlands of any type.

IV.d) The project site does not represent a regional wildlife movement corridor and provides extremely limited cover and food, and no natural, unrestricted water courses that would facilitate regional wildlife movement on-site. The closest regional wildlife movement corridor is located 2.5 miles northeast of the project site within Mill Creek Zanja. Although the Zanja, located immediately south of the project site, may represent a limited local movement route and refuge for wildlife species, this historic irrigation canal does not represent a regional wildlife movement corridor. Consequently, implementation of the proposed project would not 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.

IV.e) No regulated plants as outlined in sections 88.01.060(c), 88.01.070(b), 88.01.080(b), or 88.01.050 e(4) of the County of San Bernardino Development Code were documented on-site. However, native sycamore trees documented adjacent to the existing residential structure in the northwest portion of the project site may require a tree removal permit issued in compliance with Section 88.01.50 (Tree or Plant Removal Permits). With any required permits, implementation of the proposed project would not cause a conflict with any local policies or ordinances protecting biological resources.

IV.f) There are no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plan in the project vicinity.

Issues:

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

V. **CULTURAL RESOURCES.** Would the project:

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

___	<u> X </u>	<u> → </u>	___
-----	--------------	--------------	-----

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

___	<u> X </u>	<u> → </u>	___
-----	--------------	--------------	-----

Issues:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	—	<u>X</u>	→	—
d) Disturb any human remains, including those interred outside of formal cemeteries?	—	<u>X</u>	→	—
e) Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?	—	<u>X</u>	→	—

CULTURAL RESOURCES

A report assessing the potential for archaeological and paleontological resources, historical resources, and human remains has been prepared for the proposed project by the firm of Brian F. Smith and Associates. In addition, a Mill Creek Zanja Protection Plan has been prepared by the firm of Cadre Environmental.

V.a) During field investigations no artifacts or cultural resources were discovered, with the exception of the residential structure, which is estimated to have been constructed between 1924 and 1927. The architectural and historical significance of this building has been evaluated in accordance with City of Redlands Nomination and Designation criteria, and identified as the mixture of the Craftsman and Hall-and-Parlor Family architectural styles, but it is not currently listed on the City of Redlands List of Historic Resources (LHR). Despite being containing elements of these styles, the structure does not represent an exemplary form of historical, archaeological, cultural, economic, political, aesthetic, landscape, or architectural development, nor is it associated with any noteworthy individuals. Therefore, the 988 North Wabash Avenue residential structure is determined to be not eligible for listing on the City of Redlands LHR or the California Register of Historical Resources (CRHR). State of California Department of Parks and or the California Register of Historical Resources (CRHR).

The southern portion of the project site includes an existing 80-foot easement where Sylvan Boulevard is located. The Mill Creek Zanja is located immediately south of the easement outside the boundaries of the project site. The Zanja represents a historic irrigation canal that was designated as a California Historic Landmark in 1932 and placed on the National Register of Historic Places in 1977. No construction activities are to occur that would directly affect the Zanja. A ten foot wide pedestrian trail is, however, proposed along the southern boundary but north of the Mill Creek Zanja and the Sylvan Boulevard alignment. In order to ensure the Zanja is not adversely affected by construction in this

vicinity, a number of Mitigation Measures are required. With these measures, any potential direct or indirect impacts to the Zanja would be reduced to a less than significant level.

Mitigation Measure CUL- 1: A monitoring biologist experienced in identifying jurisdictional resources regulated by the United States Army Corp of Engineers, California Department of Fish and Wildlife and Regional Water Quality Control Board shall define the location and monitor the installation of orange silt fencing between the Mill Creek Zanja and the project site as described below:

- a. Install siltation fencing at least 10 ft. north of the Mill Creek Zanja along the entire southern extent of the project site. The fencing shall be buried at least 4 inches in depth and will also be secured in place by a continuous line of sandbags.
- b. Siltation fencing shall be tied into existing bridge crossings currently utilized by residents to allow for continued access to their properties.
- c. No staging of materials or soils shall occur within 50 ft. of the siltation fencing.
- d. Any breaches in the silt fencing shall be repaired immediately.
- e. Any direct/indirect impacts to the Mill Creek Zanja shall be reported immediately to the City of Redlands Planning Division.
- f. Following completion of construction, the monitoring biologist shall provide the City of Redlands Planning Department a letter of compliance describing all conservation and avoidance measures implemented to ensure protection of the Mill Creek Zanja.

V.b) An archaeological records search for the project and the surrounding area within a one mile radius was conducted by CSU Fullerton, and did not identify any previously recorded cultural resources on the project site. The records search did, however, identify 44 cultural resources located within a one-mile radius of the project area. The records search also indicated that there have been a total of 28 cultural resource studies conducted within a one-mile radius of the proposed project area but no previous studies have been conducted on the project site. Given the historic and prehistoric settlement of the region, in addition to the frequency of cultural sites known to be surrounding the project area, there is a low potential for archaeological discoveries. Should any cultural resources of any kind be discovered during grading and site preparation activities, the following mitigation shall be implemented, as appropriate to the type of resources involved. With these measures, potential impacts to cultural resources are reduced to a less than significant level.

Mitigation Measure CUL-2: If any cultural resources of any kind be discovered during grading and site preparation activities, a qualified archaeologist/paleontologist shall be retained to inspect specimens and

formulate a Mitigation Monitoring and Reporting Program consistent with CEQA, the policies of the City of Redlands and the County of San Bernardino, as well as specific recommendations contained in the Cultural Resource Assessment prepared for the proposed project.

Mitigation Measure CUL-3: An archaeological monitor shall be present full-time during all soil-disturbing and grading/excavation/trenching activities that could result in impacts to archaeological resources.

Mitigation Measure CUL-4: As appropriate, the principal investigator (PI) shall submit a detailed letter to the lead agency during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating previous grading/trenching activities, presence of fossil formations, or native soils is encountered that may reduce or increase the potential for resources to be present.

Mitigation Measure CUL-5: In the event of an archaeological discovery, either historic or prehistoric, the archaeological monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to, digging, trenching, excavating, or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources, and immediately notify the Native American monitor and City of Redlands Planning Department. The monitor shall immediately notify the PI (unless monitor is the PI) of the discovery.

Mitigation Measure CUL-6. The Principal Investigator shall evaluate the significance of the resource. If human remains are involved, the protocol outlined in Mitigation Measures CUL-7 and CUL-8 shall be followed.

- a. The PI shall immediately notify the City of Redlands Planning Department to discuss significance determination and shall also submit a letter indicating whether additional mitigation is required.
- b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) that has also been reviewed by the Native American consultant/monitor, and obtain written approval from the City of Redlands Planning Department to implement that program. Impacts to significant resources shall be mitigated before ground-disturbing activities in the area of discovery are allowed to resume.
- c. If the resource is not significant, the PI shall submit a letter to the City of Redlands Planning Department indicating that artifacts will be collected, curated, and documented in a final monitoring report. The letter shall also indicate that no further work is required.

Mitigation Measure CUL-7: If human remains are discovered, work shall halt in that area until a determination can be made regarding the provenance of the human remains, and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98), and the State Health and Safety Code (Sec. 7050.5) shall be undertaken.

- a. The archaeological monitor shall notify the PI, if the monitor is not qualified as a PI.
- b. The PI shall notify the medical examiner after consultation with the City, either in person or via telephone.
- c.. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the medical examiner in consultation with the PI concerning the provenance of the remains.
- d, The medical examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.
- e. If a field examination is not warranted, the medical examiner will determine, with input from the PI, if the remains are or are most likely to be of Native American origin.
- f. If the human remains are determined to be Native American, the medical examiner shall notify the Native American Heritage Commission (NAHC) within 24 hours.
- g. The NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
- h. The MLD will contact the PI within 24 hours or sooner after the medical examiner has completed coordination to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources, and the State Health and Safety Code.
- i. The MLD will have 48 hours to make recommendations to the property owner or representative for the treatment or disposition with proper dignity of the human remains and associated grave goods.
- j. Disposition of Native American human remains will be determined between the MLD and the PI, and, if:

- (1) The NAHC is unable to identify the MLD, OR the MLD failed to the (NAHC) is unable to identify the MLD, or the MLD failed to make a recommendation within 48 hours after being notified by the NAHC; or
- (2) The City of Redlands and the landowner reject the recommendation of the MLD and mediation in accordance with Public Resources Code 5097.94 (k) by the NAHC fails to provide acceptable measures; then
- (3) Upon the discovery of multiple Native American human remains during a ground-disturbing land development activity, the City of Redlands and the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery shall be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree upon the appropriate treatment measures, the human remains and grave goods buried with the Native American human remains shall be reinterred with appropriate dignity.

Mitigation Measure CUL-8: If the human remains are determined not to be Native American in origin, the PI shall contact the medical examiner and notify them of the historic era context of the burial.

- a. The medical examiner shall determine the appropriate course of action with the PI and the City of Redlands Planning Division.
- b. If the remains are of historic origin, they shall be appropriately removed and conveyed to the City of Redlands Planning Division. The decision for internment of the human remains shall be made in consultation with the City of Redlands Planning Department, the applicant and/or landowner, and any known descendant group.

Mitigation Measure CUL-9. Post construction, the PI shall submit to the City of Redlands Planning Department a draft monitoring report (even if negative) prepared in accordance with the agency guidelines, which describes the results, analysis, and conclusions of all phases of the archaeological monitoring program

- a. For significant archaeological resources encountered during monitoring, the ADRP shall be included in the draft monitoring report.

- b. Recording sites with the State of California DPR shall be the responsibility of the PI, including recording (on the appropriate forms-DPR 523 A/B) any significant or potentially significant resources encountered during the archaeological monitoring program.
- c. The PI shall submit a revised draft monitoring report to the City of Redlands Planning Department for approval prior to issuance of Building Permits, including any changes or clarifications requested by the City.

Mitigation Measure CUL-10. The PI shall be responsible for ensuring that all cultural remains collected are appropriately cleaned and cataloged.

- a. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate. The cost for curation is the responsibility of the property owner.

Mitigation Measure CUL-11: Appropriate measures for long term curation of any artifacts discovered on the project site shall be determined by the PI to the satisfaction of the City of Redlands Planning Department depending upon the nature of artifacts involved. The PI shall submit the approved final monitoring report to the City of Redlands Planning Department and any interested parties.

- V.c) The project site has been highly disturbed, as has been previously described, and there are no unique geologic features present. A field survey of the property did not yield any observable fossils or fossiliferous sediments of any sort. The presence of very old alluvial sediments (early to middle Pleistocene) at depth, however, suggest some possibility of fossil resources, although younger sediments cap these very old sediments to a depth of at least 6 feet. The lack of observable fossils or fossiliferous sediments in the field survey and the lack of any known fossil specimens or fossil locations within several miles of the project site suggest that paleontological monitoring during construction is not warranted. However, if such resources are discovered, appropriate measures are identified in Mitigation Measures CUL-2 through CUL-11 above. With mitigation under these circumstances, any potential adverse impacts to paleontological resources would be reduced to a less than significant level.
- V.d) There are no known human remains interred on the project site. If any are exposed during site preparation activities, mitigation procedures outlined in Mitigation Measures CUL-2 through CUL-11 above will apply. With this mitigation, implementation of the proposed project will result in any significant impacts to any human remains, including those interred outside of formal cemeteries.
- V.e) The records search and literature review conducted suggest that there is a low potential for prehistoric sites to be contained within the boundaries of the property, because the

property does not contain any exposed bedrock, is not associated with any natural drainages, and likely had minimal food resources. The records search, however, identified 44 cultural resources located within a one-mile radius of the project site. In accordance with the recommendations of the NAHC, all Native American consultants listed in the NAHC response letter were contacted. Responses were received from the San Manuel Band of Mission Indians, Gabrieleno Band of Mission Indians - Kizh Nation, Morgono Band of Mission Indians, and the Soboba Band of Luiseno Indians, indicating that the project is located within the tribe's ancestral territory and near the Mill Creek Zanja. Due to the location of the project, the tribe has requested to consult with the lead agency regarding the project. Mitigation Measures CUL-7 through CUL-11, above, and CUL-12, below, incorporate appropriate actions to address tribal cultural resources. With these mitigation measures, impacts to tribal cultural resources would be reduced to a less than significant level.

Mitigation Measure CUL-12: The Project applicant shall contact the consulting Native American Tribe(s) that have requested monitoring through consultation with the City during the AB 52 process (San Manuel Band of Mission Indians, Gabrieleno Band of Mission Indians - Kizh Nation, Morgono Band of Mission Indians, and the Soboba Band of Luiseno Indians). The applicant shall coordinate with these Tribes to develop a Tribal Monitoring Agreement. The tribes must agree upon a coordinated monitoring schedule and the applicant shall submit the agreement to the City of Redlands Development Services Department prior to any clearing and grubbing of the property and prior to the Issuance of a Grading Permit.

Issues:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------	--	------------------------------	-----------

VI. **GEOLOGY AND SOILS.** Would the project:

- a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:
 - i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
 - ii) Strong seismic ground shaking?
 - iii) Seismic-related ground failure, including

—	—	<u>X</u>	—
—	—	<u>X</u>	—

Issues:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
liquefaction?	—	—	<u>X</u>	—
iv) Landslides?	—	—	—	<u>X</u>
b) Result in substantial soil erosion or the loss of topsoil?	—	—	<u>X</u>	—
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?	—	—	—	<u>X</u>
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?	—	—	<u>X</u>	—
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?	—	—	—	<u>X</u>

Geology and Soils

A Preliminary Geotechnical Investigation has been prepared for the proposed project by the firm of GeoSoils, Inc, Findings of this study are summarized in this section. Please refer to the study within the Appendix for additional information.

VI.a) i. and ii.-There are no known active faults crossing the site, nor is the site located within an Alquist-Priolo Earthquake Fault Zone (Bryant and Hart, 2007), or a fault hazard zone established by San Bernardino County. Regional seismic shaking, ranging from moderate to severe may, however, occur on the site associated with nearby and/or regional faults, such as the San Jacinto Fault which is located approximately 6.2 miles from the project site and the San Andreas Fault Zone, which is located approximately 4.2 miles from the project site. These faults are estimated to be capable of generating seismic events ranging up to a magnitude from 6.7 to 7.5 on the Richter scale. The project site is not unique, however, with respect to the potential for strong seismic ground shaking, which is typical of all of Southern California.

Based on site specific seismic hazard analysis, seismic design parameters have been recommended by the project engineering geologist, as outlined in the Appendix. With compliance with these engineering recommendations and all requirements of the Uniform Building Code, the risk of loss, injury or death involving strong seismic ground shaking and seismic ground failure including liquefaction, will be reduced to the extent feasible and are considered acceptable.

iii. and iv.- The subject site consists of relatively flat-lying to gently sloping terrain, and no indications of significant mass wasting on the site were observed during geotechnical investigations or during site reconnaissance by the project engineering geologist. Therefore, the potential for mass wasting phenomena to affect the site is considered low. Likewise, the potential for seismically induced landsliding is considered low.

During on-site investigations, GeoSoils, Inc. did not observe any features commonly caused by seismically induced liquefaction, such as dikes, sills, vented sediment, lateral spreads, or soft-sediment deformation. These features would be expected if the site area had been subject to liquefaction in the past. The future performance of the site with respect to liquefaction should be similar to the past, excluding the effects of urbanization (irrigation). The potential for liquefaction and associated adverse effects within the site, after removal and recompaction of low density near-surface soils, is considered very low, even with a future rise in groundwater levels. Consequently, the potential for seismically induced ground failure, liquefaction, and landsliding are considered less than significant. No mitigation measures other than compliance with all engineering recommendations contained in the Appendix and all requirements of the Uniform Building Code are necessary.

- VI.b) Implementation of the proposed project will require grading and site preparation activities. Necessary earthwork is estimated to be 47,474 cubic yards of cut and 57,982 cubic yards of fill, for a net import of approximately 10,509 cubic yards of fill. All site preparation activities must be performed in compliance with the Grading Code of the City of Redlands and must obtain a National Pollutant Discharge Elimination Permit (NPDES) which addresses the control of potential soil erosion. A Storm Water Pollution Prevention Plan (SWPPP) would also be required to address erosion and discharge impacts associated with the proposed on-site grading. No other mitigation than compliance with all engineering recommendations contained in the Appendix and all requirements of applicable codes and regulations are necessary. On this basis, the potential impacts of soil erosion are considered less than significant.
- VI.c) See Response VI.a-iii and iv, pertaining to potential for liquefaction and landslide. Based on the nature of soils on-site, the potential for subsidence is considered low. Review of the available literature indicated that the site area is not subsiding due to down-faulting along bordering fault zones, groundwater withdrawal, or hydrocompaction. Field investigations and review of aerial photographs showed no features generally associated with areal subsidence. Based on this analysis, the potential for on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse is considered less than significant.
- VI.d) Based on laboratory testing conducted by GeoSoils, Inc. for preliminary planning purposes, the expansion potential of the onsite soils is generally very low (Expansion Index [E.I.] from 0 to 20). However, low to medium (E.I. from 20 to 90) expansive soils may not be precluded from occurring onsite. Preliminary foundation recommendations for conventional and post-tension design have been provided by the engineering geologist for the project based on these parameters. Additional expansion potential (E.I.) and plasticity index (P.I.) testing is recommended during, or shortly after, site grading to further evaluate preliminary test results obtained. No other mitigation than compliance with all engineering

recommendations contained in the Appendix and all requirements of applicable codes and regulations are necessary. On this basis, the potential impacts of expansive soils are considered less than significant.

VI.e) The proposed project will connect to the public sewer system located in Wabash Avenue. Consequently, no impacts related to septic systems or other alternative wastewater disposal methods will occur.

<u>Issues:</u>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate gas emissions, either directly or indirectly, that may have a significant impact on the environment?	—	—	<u>X</u>	—
b) Conflict with an applicable plan, policy or regulation adopted for the purposes of reducing the emissions of greenhouse gases?	—	—	<u>X</u>	—

Greenhouse Gas Emissions

An analysis of greenhouse gas generation has been prepared for this project by the firm of Urban Crossroads and is contained in the Appendix to this Mitigated Negative Declaration. Findings of this analysis are summarized in this section. Please refer to the Appendix for additional information.

VII.a) Construction activities associated with the proposed project will result in emissions of CO2 and CH4 from construction activities. Operational activities associated with the proposed Project will result in emissions of CO2, CH4, and N2O from the following primary sources: area source emissions, energy source emissions, mobile source emissions, solid waste, and water supply, treatment and distribution. The annual GHG emissions associated with the operation of the proposed project are estimated to be 651.14 MTCO2e per year. Direct and indirect operational emissions associated with the project are compared with the SCAQMD threshold of significance for small land use projects, which is 3,000 MTCO2e per year (48). This estimate incorporates construction related activities and well as long term operational activities. As shown, the proposed project would result in a less than significant impact with respect to GHG emissions.

VII.b) Local metropolitan planning agencies are required to prepare a Sustainable Communities Strategy (SCS) that demonstrates how the region will meet its GHG reduction targets. The SCS for the southern California region, including Riverside, Los Angeles, Orange, and San Bernardino counties was prepared by the Southern California Association of Governments (SCAG). The SCS plans to concentrate future development and provide higher intensity development, including residential development, in proximity to transit hubs in order to reduce vehicle miles traveled and, thereby reduce GHG emissions from personal vehicles.

The growth and land use assumptions for the SCS are to be adopted at the jurisdictions. For Redlands, the SCS's Growth Forecast assumes 24,700 households in 2008, and anticipates 28,300 households in 2020, and 32,500 in 2035. Accordingly, the project fits within this growth allocation. Consequently, implementation of the proposed project would not conflict with any applicable plan, policy or regulation adopted for the purposes of reducing the emissions of greenhouse gases.

Issues:

VIII. 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?	—	—	—	<u>X</u>
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?	—	—	—	<u>X</u>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	—	—	—	<u>X</u>
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?	—	<u>X</u>	→	—
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?	—	—	—	<u>X</u>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	—	—	—	<u>X</u>
g) Impair implementation of or physically interfere with an adopted emergency response plan or				

Issues:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
emergency evacuation plan?	—	—	<u>X</u>	—
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	—	—	—	<u>X</u>

Hazards and Hazardous Materials

A Phase I Environmental Site Assessment and a Limited Phase II Agricultural and Chemical Residue Characterization has been prepared for the proposed project site, and soil testing has been done by the firm of GeoSoils, Inc. These studies are included in the Appendix to the Mitigated Negative Declaration. Although the project site is not a designated hazardous waste site, the findings of these studies are summarized in Section VIII.d which follows. Please refer to the Appendix for additional information on these topics.

- VIII.a) The proposed project is a residential tract, which is not a type of land use that is associated with transport, use, or disposal of hazardous materials other than common household products. The transport, use, and disposal of hazardous materials, such as fuel, asphalt, paint products, lubricants, solvents, etc., during the construction of the project would be conducted in accordance with all applicable State and federal laws. Consequently, no impact related to these activities is anticipated.
- VIII.b) The proposed project is a residential tract, which is not a type of land use that is associated with upset and accident conditions involving the release of hazardous materials into the environment. Consequently, no impact related to these activities is anticipated
- VIII.c) The proposed project is a residential tract, which is not a type of land use that is associated with hazardous emissions or involvement in the handling of hazardous or acutely hazardous materials, substances, or waste. Although there is an existing school within one quarter mile, no impacts from such activities are anticipated.
- VIII.d) The project site is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5, which are commonly referred to as “Super Fund Sites”. Consequently, no impact associated with a designated hazardous waste site would occur.

The project site has, however, been utilized for agricultural purposes for many years which can involve the use of various fertilizers, pesticides, herbicides, fumigants and similar chemicals that can contaminate the soil and leave residues. As a result, in an abundance of caution, Phase I and II Environmental Site Assessments and limited supplemental soil testing has been done to assess potential hazards to the proposed project and surrounding residents during grading and site preparation activities.

Soils tests were conducted by GeoSoils, Inc. in a variety of locations on-site determined to be the most likely to have been affected by past site activities. Based on tests of composited soil samples, levels of organochlorine pesticides were greater than the detection limits for either DDT, DDE, DDD, and/or Dieldren. However, the results of these samples were well below the Regional Screening Levels (RSLs) and/or the California Human Health Screening Levels (CHHSLs) for residential soil. Therefore, based on available data, no adverse environmental impacts are anticipated from the previous application of organochlorine pesticides.

Supplemental testing conducted of stained soils identified within the grove areas, however, indicate that soil removals should be conducted prior to removal of the groves in order to avoid the potential for disturbance. Mitigation measures address this concern and require confirmation testing be performed following the removal of impacted soils.

Soil from one area (wind-machine area) showed greater than the detection limits for hydrocarbons (diesel). These results are, however, below action levels as indicated by the California Regional Water Quality Control Board (CRWQCB). All samples tested for arsenic were non-detect. One soil sample obtained from the floor drain (paint booth area) reported greater than the RSLs and CHHSLs action levels for cobalt and lead, and greater than CRWQCB action levels for hydrocarbons (diesel). Relatively minor to moderate hydrocarbon and oil staining of soils was noted in a number of other areas scattered around the project site. Reported chromium concentrations are considered to be below current action levels.

An underground storage tank (UST) sump for oil/water separation located by the front gate entry area, where supplemental soils testing confirmed that the concentrations of contaminants are below action levels. However, an existing oil/water separator UST and associated drains (including soils within the drains) must be properly disposed offsite, including confirmation sampling during removal. In addition, an existing UST located west of the wind machine should be properly disposed offsite in a similar manner. Mitigation measures address proper disposal methods for all affected areas identified in site investigations.

Based on the relative age of the existing single-family residence, it is unknown if asbestos containing materials (ACMs) or lead containing paints (LCPs) are present in the structure on the subject site. Concrete irrigation pipes may also contain asbestos. Mitigation measures address proper remediation for all affected areas identified in site investigations

Review of the government agency database records search indicated that the subject site is not on any database listings regarding the handling, storage, use, unauthorized releases, or disposal of hazardous materials/waste on the subject site.

Based on GeoSoils investigation, the site is considered acceptable for the proposed residential land use, with compliance with all applicable local, State, and Federal standards. With compliance with Mitigation Measures HAZ-1 through 10, any potential impact will be of a less than significant level.

Mitigation Measure HAZ-1: All trash, debris, and waste materials should be disposed of offsite, in accordance with current local, state, and federal disposal regulations. Any buried trash/debris encountered should be evaluated by an experienced environmental consultant prior to removal.

Mitigation Measure HAZ -2: Any, stained soils or materials containing petroleum residues, encountered during site earthwork, should be evaluated prior to removal and disposal, following proper containment procedures.

Mitigation Measure HAZ -3: All structures to be demolished or removed from the site, shall be assessed for asbestos-containing materials and lead containing paints. If present, asbestos-containing materials and/or lead containing paints should be abated prior to demolition and removal in accordance with current regulations.

Mitigation Measure HAZ -4: If asbestos-cement is encountered in irrigation pipes existing on-site, they shall be assessed for asbestos-containing materials. If present, asbestos-containing materials shall be abated prior to demolition and removal in accordance with current regulations.

Mitigation Measure HAZ-5: The steel underground storage tank (UST) sump located near the entry driveway, the UST and associated drains shall be properly disposed offsite in accordance with all applicable State and local guidelines, including confirmation sampling during removal. In addition, if other underground storage tanks are encountered elsewhere on the site, they shall be properly disposed offsite in accordance with all applicable State and local guidelines, including confirmation sampling during removal.

Mitigation Measure HAZ -6: Confirmation samples from the bottoms and sidewalls of the previous oil and diesel above ground storage tank (AST) excavations shall be collected and analyzed for the corresponding contaminants, and handled accordingly in disposal.

Mitigation Measure HAZ -7: Any old fluorescent light fixtures shall be assessed for Polychlorinated Biphenyls (PCB) materials. If present, PCB materials shall be abated prior to demolition and removal in accordance with current regulations.

Mitigation Measure HAZ -8: Any smudge pots, waste oil, and stained soil should be disposed offsite in accordance with State and local requirements. In addition, any stained soils identified within the grove areas should be disposed offsite in accordance with State and local requirements.

Mitigation Measure HAZ - 9: The soil materials within the floor drain should be properly disposed offsite in accordance with all applicable State and local guidelines. The outlet area of the floor drain (if any) should be determined. If any outlet area is found, soils within the outlet area should be tested for Title 22 metals and hydrocarbons.

Mitigation Measure HAZ -10: Any stained soils identified within the grove areas shall be disposed offsite in accordance with State and local requirements. To avoid the potential for disturbance, stained soil removals shall be conducted prior to removal of the groves. Confirmation testing shall be performed following the removal of impacted soils.

- VIII.e) The project site is located approximately 2 miles southeast of the Redlands Municipal Airport and 5 miles southeast of the San Bernardino International Airport, measured parcel boundary to parcel boundary. The Redlands Airport Compatibility Plan indicates that the proposed project is located outside of the limits of all Compatibility Zones. The project site is also located outside of the San Bernardino International Airport Influence Area. The project site is not within the direct approach or departure paths. The project involves the subdivision of land for residential lots. In consideration of the preceding facts, no air traffic safety hazards would affect this project. No mitigation is required.
- VIII.f) The project site is not located in the vicinity of a private airstrip and thus will not result in a safety hazard for people residing or working in the project area.
- VIII.g) Implementation of the proposed project will not result in the alteration of existing collector street patterns and thus will not create any obstacle to traffic/circulation during any emergencies. There is no known reason that the proposed project would physically interfere with an adopted emergency response plan or emergency evacuation plan.
- VIII.h) The project site is not located within, or near, a designated Wildland Fire Hazard Zone. Consequently, implementation of the proposed project will not expose people or structures to a significant risk of loss, injury or death from wildland fires.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---------	--------------------------------------	--	---------------------------------------	--------------

V. **HYDROLOGY AND WATER QUALITY.** Would the project::

- | | | | | |
|---|---|----------|----------|----------|
| a) Violate any water quality standards or waste discharge requirements? | — | <u>X</u> | <u>→</u> | — |
| b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | — | — | — | <u>X</u> |
| c) Substantially alter the existing drainage pattern | | | | |

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	—	—	<u>X</u>	—
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	—	—	<u>X</u>	—
e) 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?	—	—	<u>X</u>	—
f) Otherwise substantially degrade water quality?	—	—	—	<u>X</u>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	—	<u>X</u>	—	—
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	—	<u>X</u>	—	—
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	—	—	<u>X</u>	—
j) Inundation by seiche, tsunami, or mudflow?	—	—	—	<u>X</u>

Hydrology and Water Quality

A preliminary Hydrology report has been prepared for the proposed project by the firm of MDS Consulting, and is contained in the Appendix. The following discussion summarizes the findings of this report. Please refer to the Appendix for further information. In addition, portions of the information outlined below are extracted from the Preliminary Geotechnical Study prepared by the firm of GeoSoils, which is contained in Appendix.

IX.a) The proposed project will alter current drainage patterns on the subject site through the alteration of topography to create building pads, water, sewer, street and storm drain infrastructure. A water quality/detention basin will also be constructed for water treatment

and detention purposes. The entire site run-off will be conveyed by curb and gutter and the storm drain system. The majority of the run-off will be collected by flow-by and sump condition catch basins at critical points on-site. All drainage facilities must comply with NPDES (National Pollutant Discharge Elimination System) requirements and thus, will not violate any water quality standards or waste discharge requirements.

Mitigation Measures HYD-1, HYD-2, and HYD-3 will be implemented to ensure that the project would not violate water quality standards or waste discharge requirements during grading and construction activities.

HYD-1 Prior to the issuance of a grading permit, the project applicant shall file and obtain a Notice of Intent (NOI) with the Regional Water Quality Control Board in order to be in compliance with the State NPDES General Construction Storm Water Permit for discharge of surface runoff associated with construction activities. Evidence that this has been obtained (i.e., a copy of the Waste Discharger's Identification Number) shall be submitted to the City for coverage under the NPDES General Construction Permit. The NOI shall address the potential for an extended and discontinuous construction period based on funding availability.

HYD-2 Prior to the issuance of a grading permit, the project applicant shall submit to and receive approval from the City of Redlands of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP shall include a surface water control plan and erosion control plan citing specific measures to control on-site and off-site erosion during the entire grading and construction period. In addition, the SWPPP shall emphasize structural and nonstructural Best Management Practices (BMPs) to control sediment and non-visible discharges from the site. The SWPPP will include inspection forms for routine monitoring of the site during construction phase to ensure NPDES compliance and additional BMPs and erosion control measures will be documented in the SWPPP and utilized if necessary. The SWPPP shall address the potential for an extended and discontinuous construction period based on funding availability. The SWPPP will be kept on site for the entire duration of project construction and will be available to the local RWQCB for inspection at any time. Some the BMPs to be implemented may include the following:

- Sediment discharges from the site may be controlled by the following: sandbags, silt fences, straw wattles and temporary basins (if deemed necessary), and other discharge control devices. The construction and condition of the BMPs will be periodically inspected during construction and repairs will be made when necessary as required by the SWPPP.
- Materials that have the potential to contribute to non-visible pollutants to storm water must not be placed in drainage ways and must be contained, elevated, and placed in temporary storage containment areas.

- All loose piles of soil, silt, clay, sand, debris, and other earthen material shall be protected in a reasonable manner to eliminate any discharge from the site. Stockpiles will be surrounded by silt fences and covered with plastic tarps.
- In addition, the construction contractor shall be responsible for performing and documenting the application of BMPs identified in the SWPPP. Weekly inspections shall be performed on sandbag barriers and other sediment control measures called for in the SWPPP. Monthly reports and inspection logs shall be maintained by the Contractor and reviewed by the City of Redlands and the representatives of the State Water Resources Control Board. In the event that it is not feasible to implement specific BMPs, the City of Redlands can make a determination that other BMPs will provide equivalent or superior treatment either on or off site.

HYD-3 The project shall be required to comply with the submitted Water Quality Management Plan (WQMP) prepared in accordance with Santa Ana Regional Water Quality Control Board and the City of Redlands. The project shall also provide the appropriate Best Management Practices (BMPs) within the project site to stop “first flush” of accumulated pollutants from entering the City storm drain system. The project-specific BMPs may also incorporate other measures such as bio-swales in planter areas which can also eliminate the “first flush” of accumulated pollutants on street surfaces. BMPs can include onsite bio-swales, infiltration trenches, treatment units and detention basins that will reduce pollutant levels from onsite runoff to meet as defined in Municipal Code section 15.54.160. The specific mix of BMPs will be reviewed and approved by the City.

IX.b) Groundwater was not encountered in any test pits excavated during field work by geologists. Based on review of the California Department of Water Resources Water Data Library by GeoSoils, Inc. in 2014, the depth to groundwater in wells near the project site ranges from approximately ± 120 to ± 370 feet below the ground surface, with the preponderance of groundwater levels ranging from ± 60 to ± 200 feet. Historic high groundwater in the project vicinity ranges between ± 48 to ± 62 feet below grade, and has been locally shallower, and at surface near the drainage channel (Mill Creek Zanja) on the southern margin of the project site.

The proposed project will be serviced by the City of Redlands for domestic water and not draw water from local underground sources. Consequently, implementation of the proposed project will not, however, deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Consequently, impacts to groundwater are considered less than significant.

IX.c) There are no streams or rivers on the project site. The Mill Creek Zanja, which runs along

the southern boundary (but outside the project area) will not be directly affected by drainage from the proposed project, which will be conveyed off-site by curb and gutter and a proposed storm drain system. All drainage facilities must comply with NPDES (National Pollutant Discharge Elimination System) requirements, which incorporate measures to control erosion. In consideration of these factors, the proposed project will not result in the alteration of a stream in a manner that would create substantial erosion or siltation on- or off-site.

- IX.d) According to the hydrology analysis of the proposed project, storm run-off from a 10-Yr storm event will be contained within the street area between curbs while maintaining a 12 foot wide “dry lane” for vehicular movement. 100 year storm run-off will be contained within the Right-of Way. A minor portion (0.5 acres) of run-off will bypass the project site, and will drain into Wabash Avenue and be conveyed by existing curb and gutter into an existing catch basin draining to an existing 24 inch Reinforced Concrete Pipe (RCP) within Wabash Avenue which joins with an existing culvert. This facility ultimately discharges into the Mill Creek Zanja.

A low flow diversion structure will be constructed to divert the 2 Year Storm into a basin located downstream of the project site. A water quality basin to be constructed on-site is designed to address both water treatment and detention. In consideration of the preceding, implementation of the proposed project will not substantially alter the existing drainage pattern of the site or area, nor alter the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

- IX.e) Please refer to the preceding discussion under items IX-a and d. Implementation of the proposed project will 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.
- IX.f) Please refer to the preceding discussion under IXa–e. Implementation of the proposed project will not substantially degrade water quality.
- IX.g) Based on review of the San Bernardino County - Hazard Overlays (San Bernardino County, 2010), the portions of the project site are located within a 500-Year Flood Plain, and partially located within a 100-Year Flood Plain along the southern boundary near the Zanja drainage channel. A two (2) foot concrete vertical drainage ditch is designed to run along the easterly and southerly boundaries of the project site. Other measures to control storm run-off and prevent flooding are described in items IX-d. above. These measures will address the portion of the site located within a 100 year flood plain.
- IX.h) Implementation of the proposed project will place a portion of the project site within a 100-year flood hazard area. The majority of the project lies within Flood Zone X-shaded, with the southern most prtion within Zone AE and the Regulatory Floodway, as depicted on the FEMA Flood Zone Exhibit, including in the project plans. Flood flows within that area will be redirected as a result of measures designed to protect structures and future project residents. 100 year fold flows would not, however be impeded. Please refer to discussion under Item IX-d and g.above.

IX.i) Measures to address potential flooding are discussed under Items IX –d and g above. With these design features, Implementation of the proposed project will not expose people or structures to a significant risk of loss, injury or death involving flooding.

The project site is not located within a dam inundation area. Construction and operation of the proposed project would not cause or increase the likelihood of failure of a levee or dam that could result in flooding from inundation. In consideration of the preceding facts, implementation of the proposed project will not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. No mitigation is required.

IX.j) No lakes or other enclosed bodies of water are located on-site or in the vicinity of the project site. Consequently, implementation of the proposed project will not expose people to seiche hazards.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---------	--------------------------------------	--	---------------------------------------	--------------

X. LAND USE AND PLANNING. Would the project:

a) Physically divide an established community?	___	___	___	<u> X </u>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	___	___	<u> X </u>	___
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	___	___	___	<u> X </u>

Land Use and Planning

X.a) The project site is located on the easterly boundary of the City of Redlands. Implementation of the proposed project will not physically divide an established community.

X.b) In order to implement the proposed project, the following entitlement cations are necessary: 1) Annexation of approximately 11.97 acres from the unincorporated area of the County of San Bernardino into the boundaries of the City of Redlands, 2) Approval of a proposed Zone Change to pre-zone approximately 11.97 acres to be annexed from (RL-5) Rural Living (County of San Bernardino) to the Single-Family Residential (R-1) District (City of Redlands), 3) Approval of Tentative Tract Map No. 19942 to subdivide

approximately 11.97 acres into thirty four (34) single family residential lots and four (4) lettered lots, and 4) Approval of a Demolition Permit to allow removal of one existing residential structure on the subject site, two commercial buildings, and two accessory structures. With these actions, the proposed project will not result in a conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect.

- X.c) There is no habitat conservation plan or natural community conservation plan in the vicinity of the project site. Consequently, no conflicts with any habitat conservation plan or natural community conservation plan are anticipated.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	—	—	—	<u>X</u>
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?	—	—	—	<u>X</u>

Mineral Resources

- XI.a) There are no known mineral resources located on the project site or in the vicinity. Implementation of the proposed project, thus, will not 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.
- XI.b) There are no known mineral resources located on the project site or in the vicinity, and none are designated on any local policy plan. Implementation of the proposed project, thus, will not 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.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---------	--------------------------------------	--	---------------------------------------	--------------

XII. NOISE. Would the project:

- a) Exposure of persons to or generation of noise levels in excess of standards established in the

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
local general plan or noise ordinance, or applicable standards of other agencies?	—	<u>X</u>	—	—
b) Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?	—	—	—	<u>X</u>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	—	—	<u>X</u>	—
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	—	<u>X</u>	—	—
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 expose people residing or working in the project area to excessive noise levels?	—	—	—	—
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	—	—	—	—

Noise

A Noise Impact Analysis has been prepared for the proposed project by the firm of Urban Crossroads, and is contained in the Appendix. The findings of this analysis are summarized in the following discussion. Please refer to the Appendix for additional information.

XII.a) An on-site exterior noise impact analysis has been completed to determine the traffic noise exposure and to identify potential necessary noise abatement measures for the proposed project. It is expected that the primary source of noise impacts to the project site will be traffic noise from Wabash Avenue. The project will also experience some background traffic noise impacts from the project’s internal streets, however, due to the distance, topography and low traffic volume/speed, traffic noise from these roads will not make a significant contribution to the noise environment. The on-site traffic noise level impacts indicate that the lots adjacent to Wabash Avenue will experience unmitigated exterior noise levels ranging from 56.5 to 60.5 dBA CNEL. To satisfy the City of Redlands 60 dBA CNEL exterior noise level standards for residential land use, the construction of the planned 6-foot high perimeter walls is required for the outdoor living areas (backyards) of lots adjacent to Wabash Avenue. With the planned perimeter walls, the mitigated future exterior noise levels will range from 49.9 to 53.7 dBA CNEL. This noise analysis

concluded that the planned perimeter walls will satisfy the City of Redlands 60 dBA CNEL exterior noise level standards.

To ensure that the interior noise levels comply with the City of Redlands 45 dBA CNEL interior noise standards, future noise levels were calculated at the first and second floor building façades. The interior noise level is the difference between the predicted exterior noise level at the building façade and the noise reduction of the structure. Typical building construction will provide a Noise Reduction (NR) of approximately 12 dBA with "windows open" and a minimum 25 dBA noise reduction with "windows closed."

To provide the necessary interior noise reduction, lots adjacent to Wabash Avenue will require a windows closed condition and a means of mechanical ventilation (e.g. air conditioning). Future unmitigated noise levels at the first floor building façades are expected to range from 49.4 to 52.9 dBA CNEL. The first floor interior noise level analysis shows that the City of Redlands 45 dBA CNEL interior noise level standards for residential land use can be satisfied using standard windows with a minimum STC rating of 27.

Future unmitigated noise levels at the second floor building façades are expected to range from 56.1 to 59.6 dBA CNEL. The second floor interior noise level analysis concluded that the City of Redlands 45 dBA CNEL interior noise level standards for residential land use can be satisfied using standard windows with a minimum STC rating of 27. The interior noise analysis indicates that with the minimum interior noise mitigation measures described below, the proposed Project will satisfy the City of Redlands 45 dBA CNEL interior noise level standards for residential development. Consequently, long term operational noise impacts to the proposed project are considered less than significant with the recommended mitigation outlined below.

The proposed project would generate short-term noise in association with site grading and construction-related vehicle/equipment operation. Noise levels that would be generated on and off-site would depend on the type and number of equipment in use, the time of day, and the amount of time that machinery and equipment are operated. The worst-case construction noise scenario, assuming the use of a grader, dozer, excavator and a dump truck or water truck, all ranging between 50-150 feet from the property line of the nearest sensitive receptor, was calculated using the Federal Highway Administration's Roadway Construction Noise Model (RCNM). The sensitive noise receptors within the vicinity would be the adjacent single family residential developments and educational uses in the area, located to the north, west, and east.

Noise levels during project construction are expected to reach up to 82.1 dBA Leq and 85.0 dBA Lmax at the project property line and nearest sensitive receptors. Mitigation measures NOI-2, NOI-3, and NOI-4 will limit the hours and days of construction and requiring equipment with appropriate mufflers to and acoustical insulation to prevent impacts on adjacent residential uses. With implementation of Mitigation Measures NOI-2, NOI-3, and NOI-4, potential construction related sound impacts will be reduced to a less than significant level.

Mitigation Measure NOI -1: To satisfy the City of Redlands 45 dBA CNEL interior noise level standards, lots adjacent to Wabash Avenue require a Noise Reduction (NR) of up to 14.6 dBA and a windows closed condition requiring a means of mechanical ventilation (e.g. air conditioning). In order to meet the City of Redlands 45 dBA CNEL interior noise standards the Project shall provide the following or equivalent noise mitigation measures:

- **Windows:** All windows and sliding glass doors shall be well fitted, well weather-stripped assemblies and shall have a minimum sound transmission class (STC) rating of 27.
- **Doors:** All exterior doors shall be well weather-stripped solid core assemblies at least one and three-fourths-inch thick.
- **Roof:** Roof sheathing of wood construction shall be well fitted or caulked plywood of at least one-half inch thick. Ceilings shall be well fitted, well sealed gypsum board of at least one-half inch thick. Insulation with at least a rating of R-19 shall be used in the attic space.
- **Ventilation:** Arrangements for any habitable room shall be such that any exterior door or window can be kept closed when the room is in use and still receive circulated air. A forced air circulation system (e.g. air conditioning) or active ventilation system (e.g. fresh air supply) shall be provided which satisfies the requirements of the Uniform Building Code.

Mitigation Measure NOI-2 All construction activities shall be limited to the hours of 7:00 a.m. and 6:00 p.m. with no construction activities permitted on Sundays and Federal Holidays.

Mitigation Measure NOI-3 All construction equipment be corrected tuned and operated with appropriate mufflers to ensure noise during construction activities is minimized to the maximum extent feasible.

Mitigation Measure NOI-4 All noise producing equipment shall be acoustically insulated to prevent impacts on adjacent residential uses and/or sensitive receptors.

XII.b A vibration impact would generally be considered significant if it involves any construction- related or operations-related impacts in excess of 0.05 inches per second RMS vertical velocity at nearby sensitive receptors (0.035 inches per second is considered barely perceptible). Primary sources of vibration during construction would be from bulldozers, vibratory rollers and other vibratory equipment which could be used during installation of pavement. Site excavation would require only standard earthmoving equipment. No ripping or blasting would be necessary to excavate the project site. No piles will need to be driven to reach a stable rock foundation for any structures. The project does not entail the use of machinery and equipment that would result in measurable vibration impacts off site. .

The closest receptor to the project site is the single-family detached neighborhood located adjacent to the north project boundary. It is anticipated that a bulldozer could be used at a distance of 25 feet from the property line and vibratory equipment could be utilized at the property line, resulting in groundborne vibration levels of up to 0.045 PPV for short periods of time at adjacent single-family detached residential dwelling units and may be perceptible for brief periods of time, but not a nuisance. The Caltrans Transportation and Construction Induced Guidance Manual identifies 0.3 PPV as the threshold for potential structural damage to older residential structures. The adjacent neighborhood to the north is relatively new modern construction. Residences to the east are located on minimum 5 acre parcels, resulting in greater separation from the project site. In consideration of the preceding factors, the proposed project will not result in building damage.

- XII.c) Adoption of the proposed project will not result in a permanent increase in ambient noise levels in the project vicinity. Construction of future single family homes would not significantly increase existing noise levels and is forecast to remain within the “normally acceptable” level, as identified in Section 14.0 (Noise) of the MEA/EIR. No mitigation other than mitigation Measures NOI-1 is considered necessary.
- XII.d) Please refer to the response in XII(a-b) above regarding short-term construction impacts. The proposed residential development would not involve temporary activities that would generate significant noise levels. As described above in items XII(a) and (b), no significant short- or long-term noise-related impacts are anticipated from the proposed project. Mitigation Measure NOI-3 through NOI-4 will limit construction activity hours to ensure any potential impact does not exceed a less than significant level.
- XII.e) As discussed earlier in the responses to item VIII(e), the proposed project is not located within an airport land use plan. The project site is located within approximately 2 miles southeast of the Redlands Municipal Airport and 5 miles southeast of the San Bernardino International Airport, measured parcel boundary to parcel boundary. At this distance, no associated impacts are anticipated to occur. The project site is not within the direct approach or departure paths. No mitigation is required.
- XII.f) The proposed project will not expose people residing or working in the project area to excessive noise levels. The project site is not located within the influence area of a private airstrip. The project would therefore have no impact related to exposure of residents or workers to excessive airstrip noise levels, and no mitigation is required

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---------	--------------------------------------	--	---------------------------------------	--------------

XIII. POPULATION AND HOUSING. Would the project:

- a) Induce substantial population growth in an area,

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of road or other infrastructure)?	—	—	—	<u>X</u>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	—	—	—	<u>X</u>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	—	—	—	<u>X</u>

Population and Housing

- XIII.a) The proposed project totals 34 residential and thus does not represent substantial population growth. In addition, Implementation of the proposed project will not require the extension of any major infrastructure. Consequently, no direct or indirect impacts from population growth or the possible inducement of such growth are anticipated..
- XIII.b) One residential structure exists on-site and will be demolished with the proposed project. No impact necessitating the construction of replacement housing elsewhere will occur.
- XIII.c) See Response XIII,b above, The proposed project will not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. PUBLIC SERVICES. Would the project:				

- 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? — — X —

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) Police protection?	—	<u>X</u>	<u>→</u>	—
iii) Schools?	—	—	<u>X</u>	—
iv) Parks?	—	—	<u>X</u>	—
v) Other public facilities?	—	—	<u>X</u>	—

Public Services

XIV.a) Implementation of the proposed project is not expected to significantly impact or result in a need for new or altered public services provided by the City of Redlands, the Redlands Unified School District, or other government agencies. Police and fire protection for the project site will be provided by the City of Redlands. The proposed project is not expected to result in the need for new or additional public facilities. The project will not induce significant residential growth requiring additional school facilities, nor will it generate the need for additional park land. The project will be required to pay development impact fees, school facility fees, and any other City required costs to ensure the new development does not adversely impact City services.

Mitigation Measure PUB-1 will reduce any potential impact on police services to a less than significant level.

PUB-1 A construction site security plan approved by the police department is required, providing adequate security measures such as lights, video cameras, vehicle transponders, locks, alarms, trained security personnel, fencing etc. The nature of the measures will depend on the specific requirements of the site, and may vary with the different stages of construction. The developer shall be responsible for the compliance of all sub-contractors working on the site. Other impacts associated with new development are mitigated with the payment of development impact fees, and State established school fees.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---------	--------------------------------	--	------------------------------	-----------

XV. **RECREATION.** Would the project:

- a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of

Issues:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
the facility would occur or be accelerated?	___	___	<u>X</u>	___
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which have an adverse physical effect on the environment?	___	___	<u>X</u>	___

Recreation

XV.a) The City General Plan establishes a park standard of five to six acres of parkland for every 1,000 residents. Currently, the City has approximately 213.3 acres of parkland, and a ratio of 4.1 acres of parkland per 1,000 residents. The proposed project would be limited to the annexation and subdivision of land for residential uses and does not propose plans for neighborhood, community, or city parks. The City will require the project proponent to pay in lieu park fees to offset potential impacts relative to the provision of park facilities. Payment of required park fees would ensure that a less than significant impact to parks or other recreational facilities would occur, and no mitigation is required.

Issues:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. TRANSPORTATION / TRAFFIC. Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	___	<u>X</u>	<u>→</u>	___
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	___	<u>X</u>	<u>→</u>	___

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	—	—	—	<u>X</u>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	—	—	<u>X</u>	—
e) Result in inadequate emergency access?	—	—	<u>X</u>	—
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	—	—	<u>X</u>	—

Transportation / Traffic

An estimate of Trip Generation has been prepared for the project by the firm of Urban Crossroads, and is contained in the Appendix. Please refer to the Appendix for additional information.

XVI.a) The proposed project is small in scale, and is estimated to generate 32 trip ends per day with 26 AM peak trips and 34 PM peak trips, and a total of 324 trips daily. Project construction activities may potentially result in temporary and transient traffic deficiencies related to construction employee commutes, Import of construction materials and soils, and transport and use of heavy construction equipment. To assure that all potential impacts are less than significant, several mitigation measures are, however, recommended

This level of traffic generation will not conflict with any applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.

TRA-1 On-site traffic signing and striping should be implemented in conjunction with detailed construction plans for the project.

TRA-2 Sight distance at the project accesses shall comply with standard California Department of Transportation and City of Redlands sight distance

standards. The final grading, landscaping, and street improvement plans shall demonstrate that sight distance standards are met. Such plans must be reviewed by the City and approved as consistent with this measure prior to issue of grading permits.

TRA-3 The project shall contribute towards the cost of any necessary area improvements on a fair share or “pro-rata” basis.

TRA-4 Participate in the phased construction of off-site traffic signals through payment of traffic signal mitigation fees. The traffic signals within the study area at buildout should specifically include an interconnect of the traffic signals to function in a coordinated system.

XVI.b) The City of Redlands utilizes the San Bernardino County Congestion Management Program (CMP) traffic study guidelines when developing the requirements for traffic studies within the City. The CMP traffic study guidelines indicate that detailed traffic analysis is required if a project generates more than 250 two-way peak hour trips. The proposed project will generate a maximum of 34 two-way peak hour trips. In addition, the proposed project will not contribute 50 or more peak hour trips to adjacent intersections. Implementation of the proposed project will not conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways. Consequently, no detailed CMP traffic analysis is required.

XVI.c) Access to the project site by residents will require ground transportation only. The proposed project would not result in a change in air traffic patterns. No features of the proposed project will interfere in any way with air traffic patterns in the vicinity. No mitigation is required.

VI.d) Street and roadway improvements in and around the project site are designed to satisfy all City requirements for street widths, corner radii, intersection control, and incorporate design standards tailored specifically to site access requirements. Adherence to applicable City requirements would make it unlikely that the proposed development would result in any increase in hazards due to a design feature. The project only includes residential uses, which would not create traffic hazards in the surrounding area. Consequently impacts are considered less than significant.

XVI.e) Traffic associated with project construction may have a temporary effect on existing traffic circulation patterns. Therefore, it may also affect emergency access. The City will require the construction contractor to use standard procedures to minimize the length of time that any driveways would be blocked. No roadways would be closed to through traffic during project construction. Emergency vehicles would be able to pass through the project area without obstruction. Consequently, the project would have less than significant impact on emergency access.

XVI.f) The City provides an extensive network of bicycle paths and sidewalks. Public transportation is provided by Omnitrans, which operates bus routes 8, 9, 15, and 19

within the City and neighboring community of Mentone. Route 19 runs along Wabash Avenue, in front of the project site. The nearest current stop is located on Citrus Avenue at Wabash Avenue. Implementation of the proposed project would not result in permanent modifications to existing alternative transportation facilities. Project roadway improvements would comply with the City Municipal Code and Bicycle Master Plan with regard to providing sidewalks, bicycle lanes, and other alternative transportation facilities. Compliance with existing regulations would ensure that all impacts related to alternative transportation would be less than significant.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	—	—	<u>X</u>	—
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	—	—	<u>X</u>	—
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	—	—	<u>X</u>	—
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	—	—	<u>X</u>	—
e) 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?	—	—	<u>X</u>	—
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	—	—	<u>X</u>	—
g) Comply with federal, state, and local statutes and regulations related to solid waste?	—	—	<u>X</u>	—

Utilities and Service Systems

- XVII.a) Implementation of the proposed project will not impact wastewater treatment requirements of the Regional Water Quality Control Board. All sewage generated on-site will be discharged to sanitary sewer lines and conveyed into the City's collection and trunk sewer mains for treatment at the City's wastewater treatment facility. The quality of sewage discharged from indoor plumbing fixtures would be similar to the quality of other residential dwelling units within the project vicinity that currently discharge to the City's sewer system. No exceedances of applicable water treatment standards are forecast as a result of this project.
- XVII.b) Implementation of the proposed project will not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities which would cause significant environmental effects. The project will connect to City sewer. The City is a sewerage agency that treats approximately 5.6 million gallons of wastewater daily. The Redlands Wastewater Treatment Plant (WWTP) has the capability of treating 9 million gallons a day (MGD) to a secondary level. Of that, 7.2 MGD can be treated to a tertiary level. The proposed project is small in scale. The addition of thirty-four residences will have a negligible impact on the City's wastewater treatment facilities. The sewage system is already designed to accommodate increased treatment needs. The project proponent will be required to pay Development Impact Fees to "purchase" the fair share capacity of the water and wastewater system.
- XVII.c) Implementation of the proposed project may require improvements to the City's storm water drainage system. Any impacts to the storm water drainage system are mitigated with the payment of development impact fees established by the City of Redlands and paid at the time of building permit issuance. This system insures that all impacts to the City's storm water system are self-mitigating. No additional mitigation measures are needed.
- XVII.d) The proposed project would increase the daily demand for potable water supplied by the City of Redlands; however, the City has the capacity to serve the project. Relying upon the City's Urban Water Management Plan (UWMP) an assessment was prepared by the City of Redlands Municipal Utilities Department which concludes that the water supply is sufficient over the next 20 years with regard to reliability as described in the most recently adopted Urban Water Management Plan to meet demand for the proposed project and other projected growth. Furthermore, the San Bernardino Valley 2015 Regional Urban Water Management Plan and the Integrated Regional Water Management Plan (IRWMP) verify the City's capacity to provide water for this development at the proposed density. Local water mains and extensions, or payment of frontage charges, for existing mains are required for the project. Impacts to the water service system are mitigated with the payment of development impact fees paid at the time of applicable approvals. Therefore, impacts to local water supply services would be less than significant, and no additional mitigation measures are needed.
- XVII.e) Implementation of the proposed project will not significantly impact wastewater service. The City is a sewerage agency that treats approximately 5.6 million gallons of wastewater

daily. The Redlands Wastewater Treatment Plant (WWTP) has the capability of treating 9 million gallons a day (MGD) to a secondary level. Of that, 7.2 MGD can be treated to a tertiary level. The addition of 34 dwelling units will have a negligible impact on the City's wastewater treatment facilities. The City's wastewater treatment plant is more than sufficient to handle the proposed project. Local sewer mains and extensions, or payment of frontage charges for existing mains, are required for the project. Impacts to the sewer system are mitigated with the payment of development impact fees paid at the time of applicable approvals. No additional mitigation measures are needed.

XVII.f,g) The City's California Street Landfill is currently being planned and permitted to provide capacity to approximately the year 2031. The remaining capacity of the landfill is estimated to be about 5 million cubic yards/tons. Current average daily tonnage is estimated by the City to be about 300 tons per day, or about 109,500 tons per year. The proposed project would not impact solid waste issues beyond that anticipated in the Redlands General Plan EIR/MEA, and would comply with federal, state and local statutes and regulations related to solid waste. The applicant would also be required by the City's Municipal Utilities Department to pay a development impact fee which would ensure that the project's potential incremental solid waste impacts are reduced to a less than significant level. No mitigation is required.

	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--	---------------------------------------	--------------

Issues:

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.

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

— — X —

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	---------------------------------------	--------------

Issues:

probable future projects.)

—	—	<u>X</u>	—
---	---	----------	---

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

—	—	<u>X</u>	—
---	---	----------	---

Mandatory Findings of Significance

XVIII.a) No native vegetation communities or undisturbed soils are present on-site. As such, suitable habitat for sensitive plant or wildlife species of any kind is extremely limited to non-existent. Field investigations did not identify any endangered, threatened, candidate, sensitive, or special status species present on-site, although sensitive bat species such as the pallid bat and the western yellow bat may occasionally roost in the orchard and abandoned farm structures, and mature trees may occasionally serve as nesting sites for some sensitive raptor species, such as Cooper’s Hawk. Potential impacts to these species or to migratory and nesting bird species would be mitigated to a less than significant level with adherence to **Mitigation Measures BIO-1.** through **BIO-4.**, Development of the proposed project would not cause fish or wildlife populations to drop below self-sustaining levels or restrict the movement/distribution of a rare or endangered species. The proposed project would not affect any threatened or endangered species or habitat.

Development of the proposed project would not result in the elimination of any identified historic or archaeological resource. There are no known unique ethnic or cultural values associated with the site, nor are known religious or sacred uses associated with the site. **Mitigation Measures CUL-1** through **CUL-8** have been identified to address potential impacts if subsurface cultural resources or human remains are encountered during construction operations. Adherence to these measures would reduce potential impacts to a less than significant level.

XVIII.b) As presented in the discussion of environmental Checklist Responses I through XVII, the proposed project has no impact, a less than significant impact, or a less than significant impact with mitigation incorporated with respect to all environmental issues. Due to the limited scope of direct or indirect physical impacts to the environment associated with this development project, the project’s impacts are substantially project-specific in nature. The applicant will be required to pay all applicable development impact fees and adhere to all local, state, and federal laws. The project will not significantly impact the environment by itself and with the mitigation measures identified within this document will not generate cumulatively significant impacts.

XVIII.c) The design of the project, with compliance to all applicable General Plan policies, development standards, and mitigation measures ensures that there would be no substantial adverse effects on human beings, either directly or indirectly,

REFERENCES

Redlands General Plan

County of San Bernardino General Plan

Master Environmental Assessment / Final Environmental Impact Report for Redlands General Plan

California Environmental Quality Act Guidelines

California Environmental Quality Act Air Quality Handbook

California Energy Commission Title 24 Residential Standards

Noise Impact Analysis, Urban Crossroads, September 29, 2015

Preliminary Geotechnical Investigation, GeoSoils, Inc, July 17, 2014

Phase I Environmental Site Assessment and Limited Phase II Agricultural and Chemical Residue Characterization, GeoSoils, Inc., September 10, 2014

Limited Supplemental Phase II Soil Testing and Site Evaluation, GeoSoils, Inc, October 21, 2014

Cultural Resources Study, Brian F. Smith and Associates, Inc., June 27, 2016

Mill Creek Zanja Protection Plan, CADRE Environmental, February 29, 2016

Biological Resources Habitat Assessment, Brian F. Smith and Associates, April 22, 2016

Trip Generation Assessment, Urban Crossroads, May 2, 2016

Air Quality Impact Analysis, Urban Crossroads, April 29, 2016

Greenhouse Gas Analysis, Urban Crossroads, April 29, 2016

County of San Bernardino website, <http://cms.sbcounty.gov/lus/Planning/>

State of California, Department of Conservation website, <http://maps.conservation.ca.gov>

MITIGATION MEASURES AND MITIGATION MONITORING AND REPORTING PROGRAM

Agriculture and Forest Resources:

AGR-1 The project developer shall fund acquisition of farmland or farmland conservation easements at a ratio of 0.50/1. Based on the 5.5 agricultural acre area of the 11.97 acre project site, a total of 2.75 acres of prime agricultural land or conservation easements over 2.75 acres of prime agricultural land shall be acquired and permanently protected. The prime agricultural land or the conservation easement

shall be acquired and made available to an existing farmland trust or comparable organization prior to issuance of a grading permit, or a farmland trust or comparable organization shall verify that it has received sufficient funds to acquire prime agricultural land or a conservation easement over such lands. The project developer shall submit verification to the City of Redlands Development Services Department that the acquisition of farmland has been completed. A receipt from the farmland conservation agency will serve as adequate verification.

To be monitored by the Development Services Department, Planning Division, and satisfied through the receipt of verification of acquisition prior to the issuance of a grading permit.

Air Quality:

AQ-1 The project is required to comply with regional rules that assist in reducing short-term air pollutant emissions, including SCAQMD Rule 403, which requires that fugitive dust be controlled with best-available control measures. SCAQMD Rule 403 requires implementation of dust-suppression techniques to prevent fugitive dust from creating a nuisance off site. Applicable dust suppression techniques from Rule 403 include watering active sites at least twice daily; covering all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 2 feet of freeboard (vertical space between the top of the load and top of the trailer) in accordance with the requirements of California Vehicle Code (CVC) Section 23114; and controlling traffic speeds within the property to 15 mph or less.

To be monitored by the Development Services Department, Building and Safety Division and Planning Division, and the Municipal Utilities and Engineering Department through review of project notes on construction plans and verification through inspections in the field during grading and construction..

Biological Resources:

BIO-1: A detailed bat survey shall be conducted by a qualified bat biologist prior to site preparation or ground-disturbing activities, including, but not limited to demolition of the on-site structures and/or the removal or trimming of mature trees and palms. Any locations with potential for roosting or suitable as a maternity roost will be surveyed by the qualified bat biologist using an appropriate combination of structure inspection, exit counts, and acoustic surveys. Surveys shall be conducted during the appropriate season and time of day/night to ensure detection of bats. If bats are found using any structures or trees within the project area, the qualified bat biologist shall identify the bats to the species level, and evaluate the colony to determine its size and significance. The bat survey shall include: 1) the exact location of all roosting sites (location shall be adequately described and drawn on a map); 2) the number of bats present at the time of visit (count or estimate); 3) each species of bat present shall be named (include how the species was identified); and 4) the type of roost (resting during the day). A report containing the bat survey findings shall be submitted to the City and to the Department of Fish and Wildlife (Department), at the following address: 3602 Inland Empire Blvd., Suite C-220, Ontario, CA 91764.

If a roosting site and/or maternity colony(s) is detected, and the qualified bat biologist determines that impacts (either direct or indirect, including disturbance from noise, vibration, dust, exhaust) from project-related activities may occur, the Applicant shall consult with the Department to determine the most appropriate type of avoidance, minimization, and mitigation measures to implement. Examples of avoidance and minimization strategies may include daily work timing restrictions and buffer distances. Work timing restrictions and buffer distances will be determined based on the expert opinion of the qualified bat biologist, as replacement of impacted roosting sites with alternate roosting structures. Alternate roosting structures shall be designed to ensure use by bats impacted by the project. For example, designs will take into consideration the thermal and crevice/structure roosting requirements of the impacted bats. Removal of structures and/or the removal or trimming of trees, and palms shall not occur during the bat maternity season, typically March 15 through September 15.

To be monitored by the Development Services Department, Planning Division, through receipt of a copy of a signed contract between the developer and a qualified biologist, and the documented results as prepared by a qualified bat biologist, prior to issuance of a site preparation or ground-disturbing activities.

BIO-2 : A qualified biologist shall conduct a burrowing owl and nesting bird survey(s) no more than three days prior to initiation of project-related activities to document the presence or absence of nesting birds within or directly adjacent (500 feet) to the project site. The survey(s) shall focus upon identifying any raptor and/or passerine nests that may be directly or indirectly affected by construction activities. If active burrowing owl or other avian nests are documented, species-specific measures shall be prepared by a qualified biologist and implemented to prevent abandonment of the active nest. At a minimum, disturbances in the vicinity of a nest shall be postponed until the young birds have fledged. A minimum exclusion buffer of 100 feet shall be maintained during construction, depending upon the species and location. The perimeter of the nest setback zone shall be fenced or adequately demarcated with stakes and flagging at 20-foot intervals, and construction personnel and activities restricted from the area.

To be monitored by the Development Services Department, Planning Division, through receipt of a copy of a signed contract between the developer and a qualified biologist, and the documented results as prepared by a qualified biologist, prior to initiation of project-related activities.

BIO-3: A survey report by a qualified biologist verifying that no active raptor and/or passerine nests are present, or that the young have fledged, shall be submitted to the City of Redlands prior to initiation of grading in the nest setback zone. The qualified biologist shall serve as a construction monitor during those periods when construction activities occur near active nest areas to ensure that no inadvertent impacts on these nests occur.

To be monitored by the Development Services Department, Planning Division, through receipt of a copy of a signed contract between the developer and a qualified biologist, and the documented

results as prepared by a qualified biologist, prior to issuance of a grading permit.

BIO-4: A monitoring biologist experienced in identifying jurisdictional resources regulated by the United States Army Corp of Engineers, California Department of Fish and Wildlife and Regional Water Quality Control Board shall define the location and monitor the installation of orange silt fencing between the Mill Creek Zanja and the Project Site as described below:

- a. Install siltation fencing at least 10 ft. north of the Mill Creek Zanja along the entire southern extent of the Project Site. The fencing will be buried at least 4 inches in depth and will also be secured in place by a continuous line of sandbags. The orange silt fencing will serve both as a sediment barrier as well as a highly visible feature between the construction area and Mill Creek Zanja.
- b. Siltation fencing shall be tied into existing bridge crossings currently utilized by residents to allow for continued access to their properties.
- c. No staging of materials or soils shall occur within 50 ft. of the siltation fencing.
- d. Any breaches in the silt fencing will be repaired immediately.
- e. Any direct/indirect impacts to the Mill Creek Zanja would be reported immediately to the City of Redlands.
- f. Following completion of construction, the monitoring biologist will provide the City of Redlands a letter of compliance with all conservation and avoidance measures implemented to ensure protection of the Mill Creek Zanja.

Installation of fencing to be verified by the Development Services Department, Planning Division, Building and Safety Division, and Municipal Utilities and Engineering Department prior to issuance of a grading permit and monitored during the course of construction.

Cultural Resources:

CUL- 1: A monitoring biologist experienced in identifying jurisdictional resources regulated by the United States Army Corp of Engineers, California Department of Fish and Wildlife and Regional Water Quality Control Board shall define the location and monitor the installation of orange silt fencing between the Mill Creek Zanja and the project site as described below:

- a. Install siltation fencing at least 10 ft. north of the Mill Creek Zanja along the entire southern extent of the project site. The fencing shall be buried at least 4 inches in depth and will also be secured in place by a continuous line of sandbags.

- b. Siltation fencing shall be tied into existing bridge crossings currently utilized by residents to allow for continued access to their properties.
- c. No staging of materials or soils shall occur within 50 ft. of the siltation fencing.
- g. Any breaches in the silt fencing shall be repaired immediately.
- h. Any direct/indirect impacts to the Mill Creek Zanja shall be reported immediately to the City of Redlands Planning Division.
- i. Following completion of construction, the monitoring biologist shall provide the City of Redlands Planning Department a letter of compliance describing all conservation and avoidance measures implemented to ensure protection of the Mill Creek Zanja.

Installation of fencing to be verified by the Development Services Department, Planning Division, Building and Safety Division, and Municipal Utilities and Engineering Department prior to issuance of a grading permit, and monitored during the course of construction.

CUL-2: If any cultural resources of any kind be discovered during grading and site preparation activities, a qualified archaeologist/paleontologist shall be retained to inspect specimens and formulate a Mitigation Monitoring and Reporting Program consistent with CEQA, the policies of the City of Redlands and the County of San Bernardino, as well as specific recommendations contained in the Cultural Resource Assessment prepared for the proposed project.

To be monitored by the Development Services Department, Planning Division through receipt of a copy of a signed contract between the developer and a qualified archaeologist, prior to clearing and grubbing and issuance of a grading permit, and a final report containing the significance and treatment findings shall be prepared by the archaeologist, in the case of discovery, and submitted to the Development Services Department, Planning Division.

CUL-3: An archaeological monitor shall be present full-time during all soil-disturbing and grading/excavation/trenching activities that could result in impacts to archaeological resources.

To be monitored by the Development Services Department, Planning Division, through receipt of a copy of a signed contract between the developer and a qualified archaeologist, and the documented results as prepared by a qualified archaeologist, prior to clearing and grubbing and prior to issuance of a grading permit. A copy of the monitoring report shall be provided to the City of Redlands Development Services Department and to the Tribes which requested consultation during the AB52 process (San Manuel Band of Mission Indians, Gabrieleno Band of Mission Indians - Kizh Nation, Morongo Band of Mission Indians, and the Soboba Band of Luiseno Indians) prior to approval of the final map.

CUL-4: As appropriate, the principal investigator (PI) shall submit a detailed letter to the lead agency during construction requesting a modification to the monitoring program when a

field condition such as modern disturbance post-dating previous grading/trenching activities, presence of fossil formations, or native soils is encountered that may reduce or increase the potential for resources to be present.

To be monitored by the Development Services Department, Planning Division, during the course of construction.

CUL-5: In the event of an archaeological discovery, either historic or prehistoric, the archaeological monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to, digging, trenching, excavating, or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources, and immediately notify the Native American monitor and City of Redlands Planning Department. The monitor shall immediately notify the PI (unless monitor is the PI) of the discovery.

To be monitored by the Development Services Department, and Planning Division, and satisfied during construction of the project.

CUL-6. The Principal Investigator shall evaluate the significance of the resource. If human remains are involved, the protocol outlined in Mitigation Measures CUL-7 and CUL-8 shall be followed.

- a. The PI shall immediately notify the City of Redlands Planning Department to discuss significance determination and shall also submit a letter indicating whether additional mitigation is required.
- b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) that has also been reviewed by the Native American consultant/monitor, and obtain written approval from the City of Redlands Planning Department to implement that program. Impacts to significant resources shall be mitigated before ground-disturbing activities in the area of discovery are allowed to resume.
- c. If the resource is not significant, the PI shall submit a letter to the City of Redlands Planning Department indicating that artifacts will be collected, curated, and documented in a final monitoring report. The letter shall also indicate that no further work is required.

To be monitored by the Development Services Department, and Planning Division, and satisfied during construction of the project

CUL-7: If human remains are discovered, work shall halt in that area until a determination can be made regarding the provenance of the human remains, and the following procedures as

set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98), and the State Health and Safety Code (Sec. 7050.5) shall be undertaken.

- a. The archaeological monitor shall notify the PI, if the monitor is not qualified as a PI.
- b. The PI shall notify the medical examiner after consultation with the City, either in person or via telephone.
- c.. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the medical examiner in consultation with the PI concerning the provenance of the remains.
- d, The medical examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.
- e. If a field examination is not warranted, the medical examiner will determine, with input from the PI, if the remains are or are most likely to be of Native American origin.
- f. If the human remains are determined to be Native American, the medical examiner shall notify the Native American Heritage Commission (NAHC) within 24 hours.
- g. The NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
- h. The MLD will contact the PI within 24 hours or sooner after the medical examiner has completed coordination to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources, and the State Health and Safety Code.
- i. The MLD will have 48 hours to make recommendations to the property owner or representative for the treatment or disposition with proper dignity of the human remains and associated grave goods.
- j. Disposition of Native American human remains will be determined between the MLD and the PI, and, if:
 - (1) The NAHC is unable to identify the MLD, OR the MLD failed to the (NAHC) is unable to identify the MLD, or the MLD failed to make a recommendation within 48 hours after being notified by the NAHC; or

- (2) The City of Redlands and the landowner reject the recommendation of the MLD and mediation in accordance with Public Resources Code 5097.94 (k) by the NAHC fails to provide acceptable measures; then
- (3) Upon the discovery of multiple Native American human remains during a ground-disturbing land development activity, the City of Redlands and the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery shall be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree upon the appropriate treatment measures, the human remains and grave goods buried with the Native American human remains shall be reinterred with appropriate dignity.

To be monitored by the Development Services Department, and Planning Division, and satisfied during construction of the project

CUL-8: If the human remains are determined not to be Native American in origin, the PI shall contact the medical examiner and notify them of the historic era context of the burial.

- a. The medical examiner shall determine the appropriate course of action with the PI and the City of Redlands Planning Division.
- b. If the remains are of historic origin, they shall be appropriately removed and conveyed to the City of Redlands Planning Division. The decision for internment of the human remains shall be made in consultation with the City of Redlands Planning Department, the applicant and/or landowner, and any known descendant group.

To be monitored by the Development Services Department, and Planning Division, and satisfied during construction of the project

CUL-9. Post construction, the PI shall submit to the City of Redlands Planning Division a draft monitoring report (even if negative) prepared in accordance with the agency guidelines, which describes the results, analysis, and conclusions of all phases of the archaeological monitoring program.

- a. For significant archaeological resources encountered during monitoring, the ADRP shall be included in the draft monitoring report.

- b. Recording sites with the State of California DPR shall be the responsibility of the PI, including recording (on the appropriate forms-DPR 523 A/B) any significant or potentially significant resources encountered during the archaeological monitoring program.
- c. The PI shall submit a revised draft monitoring report to the City of Redlands Planning Department for approval prior to issuance of Building Permits, including any changes or clarifications requested by the City.

To be monitored by the Development Services Department, and Planning Division, and satisfied during construction of the project

CUL-10. The PI shall be responsible for ensuring that all cultural remains collected are appropriately cleaned and cataloged.

- a. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate. The cost for curation is the responsibility of the property owner.

To be monitored by the Development Services Department, and Planning Division, and satisfied during construction of the project

CUL-11: Appropriate measures for long term curation of any artifacts discovered on the project site shall be determined by the PI to the satisfaction of the City of Redlands Planning Division depending upon the nature of artifacts involved. The PI shall submit the approved final monitoring report to the City of Redlands Planning Division and any interested parties.

To be monitored by the Development Services Department, and Planning Division, and satisfied during construction of the project.

CUL-12: The Project applicant shall contact the consulting Native American Tribe(s) that have requested monitoring through consultation with the City during the AB 52 process (San Manuel Band of Mission Indians, Gabrieleno Band of Mission Indians - Kizh Nation, Morongo Band of Mission Indians, and the Soboba Band of Luiseno Indians). The applicant shall coordinate with these Tribes to develop a Tribal Monitoring Agreement. The tribes must agree upon a coordinated monitoring schedule and the applicant shall submit the agreement to the City of Redlands Development Services Department prior to any clearing and grubbing of the property and prior to the Issuance of a Grading Permit.

To be monitored by the Development Services Department, and Planning Division, and the Municipal Utilities and Engineering Department, and satisfied through receipt of an approved Tribal Monitoring Agreement, prior to clearing and grubbing and issuance of a grading permit.

Hazards and Hazardous Materials

HAZ-1: All trash, debris, and waste materials should be disposed of offsite, in accordance with current local, state, and federal disposal regulations. Any buried trash/debris encountered should be evaluated by an experienced environmental consultant prior to removal.

To be monitored by the Development Services Department, Building and Safety Division and Planning Division, and satisfied during construction of the project.

HAZ -2: Any, stained soils or materials containing petroleum residues, encountered during site earthwork, should be evaluated prior to removal and disposal, following proper containment procedures.

To be monitored by the Development Services Department, Building and Safety Division and Planning Division, and satisfied during site preparation and grading operations.

HAZ -3: All structures to be demolished or removed from the site, shall be assessed for asbestos-containing materials and lead containing paints. If present, asbestos-containing materials and/or lead containing paints should be abated prior to demolition and removal in accordance with current regulations.

To be monitored by the Development Services Department, Building and Safety Division and Planning Division, prior to issuance of a Demolition Permit.

HAZ-4: If asbestos-cement is encountered in irrigation pipes existing on-site, they shall be assessed for asbestos-containing materials. If present, asbestos-containing materials shall be abated prior to demolition and removal in accordance with current regulations.

To be monitored by the Development Services Department, Building and Safety Division and Planning Division, and satisfied prior to initiating demolition activities.

HAZ-5: The steel underground storage tank (UST) sump located near the entry driveway, the UST and associated drains shall be properly disposed offsite in accordance with all applicable State and local guidelines, including confirmation sampling during removal. In addition, if other underground storage tanks are encountered elsewhere on the site, they shall be properly disposed offsite in accordance with all applicable State and local guidelines, including confirmation sampling during removal.

To be monitored by the Development Services Department, Building and Safety Division and Planning Division, and satisfied during construction of the project.

HAZ -6: Confirmation samples from the bottoms and sidewalls of the previous oil and diesel above ground storage tank (AST) excavations shall be collected and analyzed for the corresponding contaminants, and handled accordingly in disposal.

To be monitored by the Development Services Department, Building and Safety Division and Planning Division, and satisfied during construction of the project.

HAZ -7: Any old fluorescent light fixtures shall be assessed for Polychlorinated Biphenyls (PCB) materials. If present, PCB materials shall be abated prior to demolition and removal in accordance with current regulations.

To be monitored by the Development Services Department, Building and Safety Division and Planning Division, prior to issuance of a Demolition permit.

HAZ -8: Any smudge pots, waste oil, and stained soil should be disposed offsite in accordance with State and local requirements. In addition, any stained soils identified within the grove areas should be disposed offsite in accordance with State and local requirements.

To be monitored by the Development Services Department, Building and Safety Division and Planning Division, and satisfied prior to initiating site preparation and grading activities.

HAZ -9: The soil materials within the floor drain should be properly disposed offsite in accordance with all applicable State and local guidelines. The outlet area of the floor drain (if any) should be determined. If any outlet area is found, soils within the outlet area should be tested for Title 22 metals and hydrocarbons.

To be monitored by the Development Services Department, Building and Safety Division and Planning Division, and satisfied prior to initiating site preparation and grading activities.

HAZ -10: Any stained soils identified within the grove areas shall be disposed offsite in accordance with State and local requirements. To avoid the potential for disturbance, stained soil removals shall be conducted prior to removal of the groves. Confirmation testing shall be performed following the removal of impacted soils.

To be monitored by the Development Services Department, Building and Safety Division and Planning Division, and satisfied prior to removal of existing groves.

Hydrology and Water Quality

HYD-1 To mitigate the potential impacts identified in IX (a) of the Environmental Checklist, prior to the issuance of a grading permit, the project applicant shall file and obtain a Notice of Intent (NOI) with the Regional Water Quality Control Board in order to be in compliance with the State NPDES General Construction Storm Water Permit for discharge of surface runoff associated with construction activities. Evidence that this has been obtained (i.e., a copy of the Waste Discharger's Identification Number) shall be submitted to the City for coverage under the NPDES General Construction Permit. The NOI shall address the potential for an extended and discontinuous construction period based on funding availability.

To be monitored by the Municipal Utilities and Engineering Services Department and the Building & Safety Division of the Development Services Department prior to issuance of grading permits.

HYD-2 To mitigate the potential impacts identified in IX (a) of the Environmental Checklist, prior to the issuance of a grading permit, the project applicant shall submit to and receive approval from the City of Redlands of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP shall include a surface water control plan and erosion control plan citing specific measures to control on-site and off-site erosion during the entire grading and construction period. In addition, the SWPPP shall emphasize structural and nonstructural Best Management Practices (BMPs) to control sediment and non-visible discharges from the site. The SWPPP will include inspection forms for routine monitoring of the site during construction phase to ensure NPDES compliance and additional BMPs and erosion control measures will be documented in the SWPPP and utilized if necessary. The SWPPP shall address the potential for an extended and discontinuous construction period based on funding availability. The SWPPP will be kept on site for the entire duration of project construction and will be available to the local RWQCB for inspection at any time. Some the BMPs to be implemented may include the following:

- Sediment discharges from the site may be controlled by the following: sandbags, silt fences, straw wattles and temporary basins (if deemed necessary), and other discharge control devices. The construction and condition of the BMPs will be periodically inspected during construction and repairs will be made when necessary as required by the SWPPP.
- Materials that have the potential to contribute to non-visible pollutants to storm water must not be placed in drainage ways and must be contained, elevated, and placed in temporary storage containment areas.
- All loose piles of soil, silt, clay, sand, debris, and other earthen material shall be protected in a reasonable manner to eliminate any discharge from the site. Stockpiles will be surrounded by silt fences and covered with plastic tarps.
- In addition, the construction contractor shall be responsible for performing and documenting the application of BMPs identified in the SWPPP. Weekly inspections shall be performed on sandbag barriers and other sediment control measures called for in the SWPPP. Monthly reports and inspection logs shall be maintained by the Contractor and reviewed by the City of Redlands and the representatives of the State Water Resources Control Board. In the event that it is not feasible to implement specific BMPs, the City of Redlands can make a determination that other BMPs will provide equivalent or superior treatment either on or off site.

To be monitored by the Municipal Utilities and Engineering Services Department and the Building & Safety Division of the Development Services Department prior to issuance of grading permits.

HYD-3 To mitigate the potential impacts identified in IX (a) of the Environmental Checklist, the project shall be required to comply with the submitted Water Quality Management Plan (WQMP) prepared in accordance with Santa Ana Regional Water Quality Control Board and the City of Redlands. The project shall also provide the appropriate Best Management Practices (BMPs) within the project site to stop “first flush” of accumulated pollutants from entering the City storm drain system. The project-specific BMPs may also incorporate other measures such as bio-swales in planter areas which can also eliminate

the “first flush” of accumulated pollutants on street surfaces. BMPs can include onsite bio-swales, infiltration trenches, treatment units and detention basins that will reduce pollutant levels from onsite runoff to meet as defined in Municipal Code section 15.54.160. The specific mix of BMPs will be reviewed and approved by the City.

To be monitored by the Municipal Utilities and Engineering Department and verified prior to issuance of Building Permits.

Noise

NOI -1: To satisfy the City of Redlands 45 dBA CNEL interior noise level standards, lots adjacent to Wabash Avenue require a Noise Reduction (NR) of up to 14.6 dBA and a windows closed condition requiring a means of mechanical ventilation (e.g. air conditioning). In order to meet the City of Redlands 45 dBA CNEL interior noise standards the Project shall provide the following or equivalent noise mitigation measures:

- **Windows:** All windows and sliding glass doors shall be well fitted, well weather-stripped assemblies and shall have a minimum sound transmission class (STC) rating of 27.
- **Doors:** All exterior doors shall be well weather-stripped solid core assemblies at least one and three-fourths-inch thick.
- **Roof:** Roof sheathing of wood construction shall be well fitted or caulked plywood of at least one half inch thick. Ceilings shall be well fitted, well sealed gypsum board of at least one-half inch thick. Insulation with at least a rating of R-19 shall be used in the attic space.
- **Ventilation:** Arrangements for any habitable room shall be such that any exterior door or window can be kept closed when the room is in use and still receive circulated air. A forced air circulation system (e.g. air conditioning) or active ventilation system (e.g. fresh air supply) shall be provided which satisfies the requirements of the Uniform Building Code.

To be monitored by the Development Services Department, Building & Safety Division and Planning Division, and satisfied through notes on the approved construction plans prior to issuance of Building Permits and implementation during construction of the project.

NOI-2 All construction activities shall be limited to the hours of 7:00 a.m. and 6:00 p.m. with no construction activities permitted on Sundays and Federal Holidays.

To be monitored by the Development Services Department, Building & Safety Division and Planning Division, and satisfied through notes on the approved grading and construction plans and implementation during construction of the project.

NOI-3 All construction equipment be correctly tuned and operated with appropriate mufflers to ensure noise during construction activities is minimized to the maximum extent feasible.

To be monitored by the Development Services Department, Building & Safety Division and Planning Division, and satisfied through notes on the approved grading and construction plans and implementation during construction of the project.

NOI-4 All noise producing equipment shall be acoustically insulated to prevent impacts on adjacent residential uses and/or sensitive receptors.

To be monitored by the Development Services Department, Building & Safety Division and Planning Division, and satisfied through notes on the approved grading and construction plans and implementation during construction of the project.

Public Services

PUB-1 To mitigate the potential impacts identified in XIV (a) of the Environmental Checklist, a construction site security plan approved by the Police Department is required, providing adequate security measures such as lights, video cameras, vehicle transponders, locks, alarms, trained security personnel, fencing etc. The nature of the measures will depend on the specific requirements of the site, and may vary with the different stages of construction. The developer shall be responsible for the compliance of all sub-contractors working on the site. Other impacts associated with new development are mitigated with the payment of development impact fees, and State established school fees.

To be monitored by the Police Department, Development Services Department, Building and Safety Division, and Municipal Utilities and Engineering Department and verified prior to issuance of a grading permit and building permits, as appropriate to the phase of construction.

Transportation/Traffic

TRA-1 On-site traffic signing and striping should be implemented in conjunction with detailed construction plans for the project.

To be monitored by the Municipal Utilities and Engineering Department and verified prior to issuance of building permits.

TRA-2 Sight distance at the project access point(s) shall comply with standard California Department of Transportation and City of Redlands sight distance standards. The final grading, landscaping, and street improvement plans shall demonstrate that sight distance standards are met.

To be monitored by the Municipal Utilities and Engineering Department and verified prior to issuance of grading permits.

TRA-3 The project shall contribute towards the cost of any necessary area improvements on a fair share or "pro-rata" basis.

To be monitored by the Municipal Utilities and Engineering Department prior to issuance of a Certificate of Occupancy.

TRA-4 Participate in the phased construction of off-site traffic signals through payment of traffic signal mitigation fees. The traffic signals within the study area at buildout should specifically include an interconnect of the traffic signals to function in a coordinated system.

To be monitored by the Municipal Utilities and Engineering Department prior to issuance of a Certificate of Occupancy.

