

SAN BERNARDINO COUNTY INITIAL STUDY ENVIRONMENTAL CHECKLIST FORM

This form and the descriptive information in the application package constitute the contents of Initial Study pursuant to County Guidelines under Ordinance 3040 and Section 15063 of the State CEQA Guidelines.

PROJECT LABEL:

APN:	0292-053-08
Applicant:	West Grove 9.5, Inc. c/o Transtech Engineers 413 MacKay Drive, San Bernardino, CA 92408
Project No:	P201900171- Planned Development
Staff:	Steven Valdez, Senior Planner
Rep:	Dave Mlynarski, c/o Transtech Engineers, Telephone: (909) 384-7464 Email: david.mlynarski@transtech.org
Proposal:	Planned Development proposal to develop a 282-unit multi-family apartment complex on an approximate 9.5-acre parcel located at 24000 West Lugonia Avenue, Redlands, CA 92374.

USGS Quad: Redlands
Lat/Long: 34° 04' 36.15.1" N, 117° 13' 14.2" W
T, R, Section: T.1S, R.3W, Section 20, NW ¼
City: Unincorporated
LUZD: East Valley Special Development (EV/SD)
Overlays: FEMA Flood Zone X

PROJECT CONTACT INFORMATION:

Lead agency: County of San Bernardino
Land Use Services Department
385 N. Arrowhead Avenue, 1st Floor
San Bernardino, CA 92415-0182

Contact person: Steven Valdez, Senior Planner
Phone No: (909) 387-4421 **Fax No:** (909) 387-3223
E-mail: Steven.Valdez@lus.sbcounty.gov

PROJECT DESCRIPTION:

Summary

West Grove 9.5 Inc. (Project Applicant) is proposing the development of a 282 unit multi-family apartment complex, known as "The Standard Apartments"(Project) on a vacant 9.5-acre parcel (APN 0292-053-08) located on the north side of Lugonia Avenue west of Nevada Street (see Figure 1- Regional Map and Figure 2 Vicinity Map) in an unincorporated area of San Bernardino County adjacent to the City of Redlands. The Project consists of the construction of five, three-story buildings and two, two-story buildings, including 280 leasable units, one permanent manager's unit and one model unit for preleasing activities. The Project also consists of a 7,584 square-foot clubhouse and a 1,000 square-foot pool house. The clubhouse/pool house buildings will include a leasing office, business center, clubhouse, fitness center, pool bathrooms and pool equipment room. A permanent non-leasable model unit and rooftop deck will be located above the fitness center. Access to the site would be via two driveways along Lugonia Avenue. The Project will also connect via two driveways to the adjacent, approved, but not constructed, apartment complex (The Redlands) to the east.

The Project include a parking garages, secure gated access, recreational pool and clubhouse, landscaping, water features, and open and community space. The maximum building height would not exceed 35 feet. For the residential buildings there are four building types (Type A through Type D). Buildings 1 and 2 (Type C – Carriage Buildings, 4 units each) would be two-story and total approximately 4,792 square feet. Building 3 (Type B, 27 units) would be three-story structures with a total of 37,236 square feet. Buildings 4 through 6 (Type A, 62 units each) and Building 7 (Type D, 64 units) would be three-story structures and total approximately 87,986 square feet.

An elevator would provide access from the ground level and connect the clubhouse roof deck to Building 3 via a pedestrian bridge at the second-floor level. Buildings 1 and 2 (Type C- Carriage Buildings) would house two single-level units over ground floor garages. Proposed floor plans include a total of 22 studio units, 103 one-bedroom units, 146 two-bedroom units and 10 three-bedroom units for a total of 276 units plus 4 carriage units making a grand total of 280 leasable apartment units, plus one manager unit and one non-leasable model for a total of 282 units. The total footprint area of the buildings total 133,662 square-feet.

The apartment buildings would be clustered around four landscaped courtyards. Courtyards would vary with amenities and together would provide for play equipment, B-B-Q facilities, seating, shelter, decorative paved surfaces, potted flowering plants, seat walls, ornamental lighting, water features and/or statuary.

A parking/landscape buffer is proposed between the Project and existing industrial uses (i.e., warehouses) to the north and west. The buffer would include a series of carports, garages and landscape screening. The nearest residential structure occurs approximately 60 feet west from any common property line with existing industrial uses.

The Project Site occurs within the East Valley Area Plan and has a zoning land use designation of East Valley Special Development (EV/SD) as identified in the San Bernardino County General Plan. The EVSD is intended to allow a mix of residential, commercial, and/or manufacturing activities that maximize the utilization of natural as well as man-made resources. Multi-family residential and commercial projects are permitted in the EV/SD District subject to approval of a Planned Development providing adequate buffering from existing 'high impact' commercial and warehouse projects in the area, and ensuring that the project is provided with adequate amenities and infrastructure improvements.

Surrounding Land Uses and Setting

The Project Site occurs in an unincorporated area of San Bernardino County, commonly referred to as "the donut hole." The County of San Bernardino Land Use Zoning Map shows the Project Site is within the East Valley Special Development (EV/SD) zone. Surrounding land uses from the Project Site include industrial development (i.e., warehouses) to the north and west, offices (SoCal Gas) to the south, and vacant land (approved apartment complex, The Redlands) to the east. The following table lists the existing land uses and zoning district designations.

Existing Land Use and Land Use Zoning Districts		
Location	Existing Land Use	Land Use Zoning District
Project Site	Vacant	East Valley Special Development (EV/SD); County of San Bernardino
North	Industrial Complex	East Valley Special Development; County of San Bernardino
South	Commercial Office	Commercial Retail (SP25); City of Redlands
East	Vacant; approved/proposed multi-family residential	East Valley Special Development (EV/SD); County of San Bernardino
West	Industrial	Public Institutional (PDI); County of San Bernardino

ADDITIONAL APPROVAL REQUIRED BY OTHER PUBLIC AGENCIES

(Example: permits, financing approvals, or participation agreements.)

FEDERAL: None required

STATE: Regional Water Quality Control Board (RWQCB) – Santa Ana Region

COUNTY: Land Use Services-Building and Safety/Code Enforcement, County Fire; Public Health-Environmental Health Services (DEHS), Public Works, AND

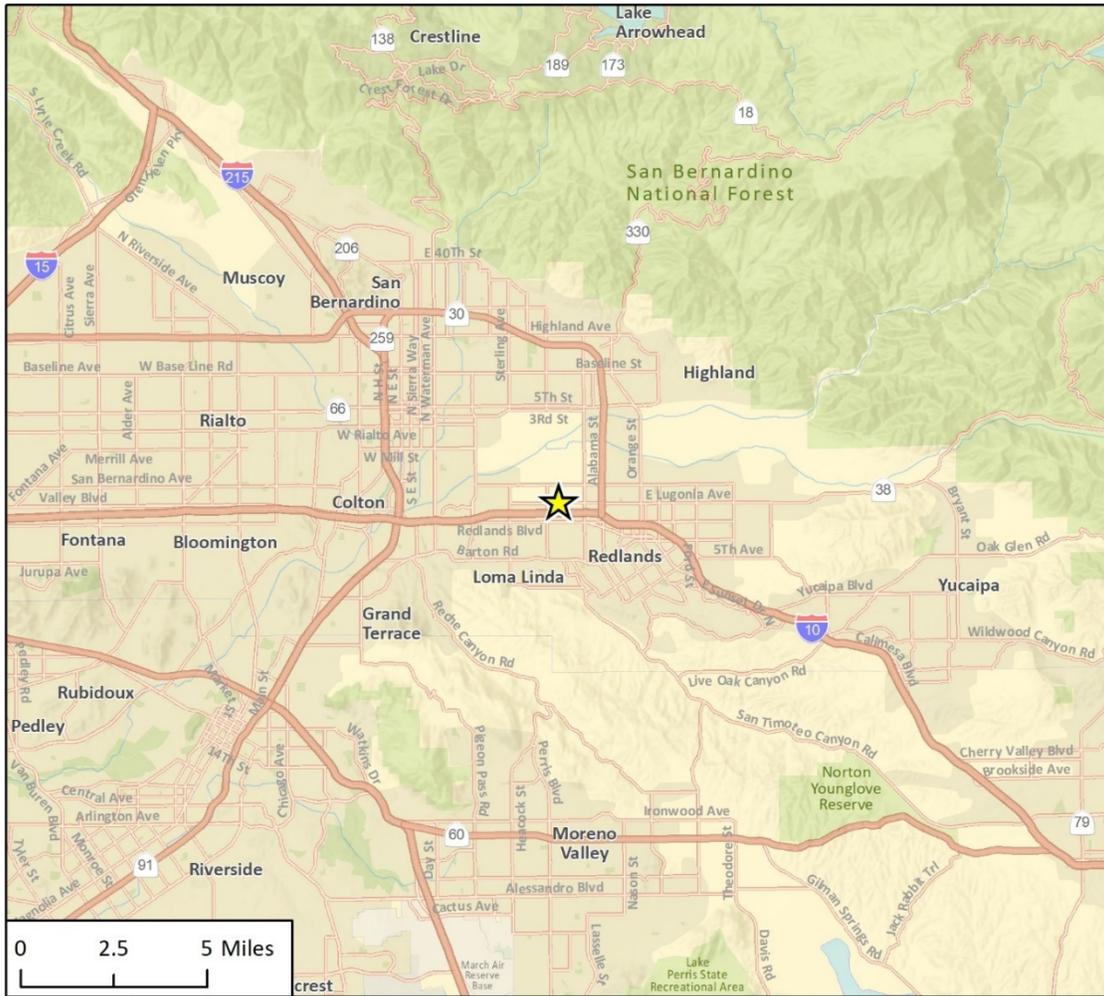
LOCAL: Local Agency Formation Commission (LAFCO), San Bernardino International Airport Authority (Avigation Easement). Special District CSA 70, Improvement Zone EV-1, City of Redlands by special agreement provides water, sewer, sanitation, police and fire services to this area.

SUMMARY OF CONSULTATION WITH CALIFORNIA NATIVE AMERICAN TRIBES

In accordance with AB 52, the County of San Bernardino Land Use Services Department mailed out letters on April 24, 2019, to five tribes requesting information on projects received at the County. In an e-mail from Travis Armstrong, Tribal Historic Preservation Officer for the Morongo Band of Mission Indians, dated May 14, 2019, a request for consultation was made and a copy of the records search and cultural assessment was provided. In a follow up email sent on March 11, 2020, Mr. Armstrong, thanked the County for providing the requested reports and requested the close of consultation for the Project.

In an email provided on May 24, 2019, Ms. Jessica Mauck of the Cultural Resources Management Department for the San Manuel Band of Mission Indians (SMBMI), indicated that due to the existing level of disturbance within the proposed Project Site, SMBMI does not have any concerns with the Project’s implementation, as planned, at this time, but requested that standard mitigation measures/conditions, as provided in an attached in the e-mail) be made a part of the Project.

Figure 1: Regional Location



★ Project Location



Fig. 1 Regional Location

Figure 2: Project Vicinity



Figure 3: Site Plan



EVALUATION FORMAT

This initial study is prepared in compliance with the California Environmental Quality Act (CEQA) pursuant to Public Resources Code Section 21000, et seq. and the State CEQA Guidelines (California Code of Regulations Section 15000, et seq.). Specifically, the preparation of an Initial Study is guided by Section 15063 of the State CEQA Guidelines. This format of the study is presented as follows. The project is evaluated based on its effect on 20 major categories of environmental factors. Each factor is reviewed by responding to a series of questions regarding the impact of the project on each element of the overall factor. The Initial Study checklist provides a formatted analysis that provides a determination of the effect of the project on the factor and its elements. The effect of the project is categorized into one of the following four categories of possible determinations:

Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant	No Impact
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Substantiation is then provided to justify each determination. One of the four following conclusions is then provided as a summary of the analysis for each of the major environmental factors.

1. **No Impact:** No impacts are identified or anticipated, and no mitigation measures are required.
2. **Less than Significant Impact:** No significant adverse impacts are identified or anticipated, and no mitigation measures are required.
3. **Less than Significant Impact with Mitigation Incorporated:** Possible significant adverse impacts have been identified or anticipated and the following mitigation measures are required as a condition of project approval to reduce these impacts to a level below significant. The required mitigation measures are: (List of mitigation measures)
4. **Potentially Significant Impact:** Significant adverse impacts have been identified or anticipated. An Environmental Impact Report (EIR) is required to evaluate these impacts, which are (List of the impacts requiring analysis within the EIR).

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

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below will 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"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology / Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials |
| <input type="checkbox"/> Hydrology / Water Quality | <input type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population / Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities / Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION:

On the basis of this initial evaluation:

<input type="checkbox"/>	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
<input checked="" type="checkbox"/>	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
<input type="checkbox"/>	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
<input type="checkbox"/>	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
<input type="checkbox"/>	I find that the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Steven A. Valdez

Signature (Reviewed by Steven Valdez, Senior Planner)

4/17/2020

Date

David Prusch

Signature: (David Prusch, Supervising Planner)
Land Use Services Department/Planning Division

4/20/2020

Date

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
I. AESTHETICS , Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare, which will adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SUBSTANTIATION: (Check if project is located within the view-shed of any Scenic Route listed in the General Plan):

- a) Have a substantial adverse effect on a scenic vista?

The Project Site and surrounding area does not occur within a scenic vista. Scenic resources for the area include views of the San Bernardino Mountains to the north, San Gabriel mountains to the northwest, and San Gorgonio Peak to the east. The Proposed Project includes the construction of three-story and two-story apartment buildings that would not exceed a maximum height of 35 feet and would be similar in overall appearance to nearby existing and proposed multi-family residential development located east of the Project Site. The Project will have a less than significant impact on scenic vistas. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

Less than Significant Impact

- b) Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?

There are no designated County Scenic Highways within San Bernardino County¹. The nearest State designated Scenic Highway occurs approximately 30 miles northeast of the Project Site and includes a 15.7-mile portion of State Route 38 (beginning from South Fork Campground to approximately 2.9 miles south of Route 18 at State Lane). In addition, there are no protected trees, rock outcroppings or historic buildings that occur on-site or within a State Scenic Highway that would be impacted by

¹Obtaining state recognition as an officially designated County Scenic Highway follows the same Scenic Highway program requirements that apply to State Routes.

implementation of the Project. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

No Impact

- c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The Proposed Project will not substantially degrade the existing visual character of the site and its surroundings. The Project is consistent with the existing visual character of the area and will incorporate landscaping, screen walls and landscaping for exterior mechanical equipment and parking areas. The Project Site is located within an area that is surrounded by existing development, including existing and proposed multi-family residential to the east, industrial development (warehouses) to the north and west, and commercial offices to the south. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

Less than Significant Impact

- d) Create a new source of substantial light or glare, which will adversely affect day or nighttime views in the area?

The Proposed Project will not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Lighting proposed for the Project would be required to will be hooded and shielded to protect surrounding properties from any resultant glare. The Project is designed to be architecturally compatible with surrounding development. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

Less Than Significant Impact

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
<p>II. AGRICULTURE AND FORESTRY 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</p>				

carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Will 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

SUBSTANTIATION: (Check if project is located in the Important Farmlands Overlay):

- 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?

The Project Site is identified as Grazing Land on the Farmland Mapping and Monitoring Program map prepared by the Department of Conservation. Grazing Land is considered land for which the existing vegetation is suited for grazing of livestock. The County of San Bernardino General Plan discusses the loss of designated farmland in its 2007 EIR. In it, the County found that the loss of designated farmland would occur, especially in the Project area. However, the Project Site is located in an area that does not contain prime agricultural soils and was re-zoned for urban development with the adoption of the East Valley Area Plan in the 1990s. In accordance with the East Valley Area Plan, the area surrounding the Project Site has been rapidly changing from agricultural uses (citrus cultivation) to urban uses. Approval of the Project would authorize removal of vegetation suitable for grazing, but it would not constitute a significant loss of an agricultural resource. The Project Site is not considered prime farmland, unique farmland or farmland of statewide importance. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

No Impact

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

The Project Site is not under a Williamson Act Contract as identified in the latest map prepared by the California Department of Conservation, Division of Land Resource Protection. According to the Williamson Act Maps used by the Land Use Services Division, there are no active Williamson Act Contracts for the Project Site or adjacent parcels. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

No Impact

- 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))?

Implementation of the Proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned for Timberland Production because the Project Site is zoned SD/EV and does not support these resources. The Project Site occurs within the East Valley Area Plan and is zoned East Valley Special Development (EV/SD) which is intended to allow a mix of residential, commercial, and/or manufacturing activities that maximize the utilization of natural as well as man-made resources. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

No Impact

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

The Project Site does not support forest land. Implementation of the Proposed Project would not result in loss of forest land or conversion of forest land to non-forest use. No impacts are identified or are anticipated, and no mitigation measures are required.

No Impact

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

The Proposed Project would not involve changes in the existing environment, which, due to their location or nature, would result in conversion of Farmland to a non-agricultural use because, although the Project involves the development of multi-family residential, the site is currently not used for agricultural purposes. The Project Site is planned for urban uses pursuant to the East Valley Area Plan and is not zoned for agricultural use. Therefore, no impacts are identified or are anticipated, and no mitigation measures are required.

No Impact

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
III. AIR QUALITY - Where available, the significance criteria established by the applicable air quality management or air pollution control district might be relied upon to make the following determinations. Will the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in substantial emissions (such as odors or dust) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SUBSTANTIATION: *(Discuss conformity with the South Coast Air Quality Management Plan, if applicable):*

An Air Quality and Greenhouse Gas Emission Study was prepared for the Project by Rincon Consultants, Inc., and is dated December 2019. A copy of the report is available for review at the County of San Bernardino Land Use Services Department.

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

The Project Site occurs in the South Coast Air Basin (SCAB), which is bound by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto mountains to the north and east, and includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, in addition to the San Gorgonio Pass area in Riverside County. The South Coast Air Quality Management District (SCAQMD) is the designated air quality control agency in the SCAB.

Under state law, the SCAQMD is required to prepare a plan for air quality improvement for pollutants for which the District is in nonattainment. Every three years, the SCAQMD prepares a new Air Quality Management Plan (AQMP), which updates the previous plan and has a 20-year horizon. The SCAQMD's latest AQMP, the 2016 AQMP, was adopted on March 3, 2017. The 2016 AQMP incorporates new scientific data and notable regulatory actions that have occurred since adoption of the 2012 AQMP, including the approval of the new federal 8-hour ozone standard of 0.070 ppm finalized in 2015 (SCAQMD 2017). The 2016 AQMP incorporates the latest Southern California Association of Government's (SCAG) forecasts for population, housing, and employment growth for managing Basin air quality.

A project may be inconsistent with the SCAQMD's AQMP if it would generate population, housing, or employment growth exceeding the forecasts used in the development of the AQMP. The 2016 AQMP relies on local city general plans' and SCAG's Regional Transportation Plan (RTP) forecasts of population, housing, and employment growth for managing Basin air quality. In the 2016 RTP/SCS,

SCAG estimates that the population of unincorporated San Bernardino County will increase to 344,100 by 2040 (SCAG 2015).

The development of 282 residential units on the Project Site may cause a direct increase in the County's population. Based on Department of Finance (DOF) 2018 estimates for the average household size in unincorporated San Bernardino County (3.11 persons per household), the Project would accommodate approximately 877 new residents (i.e., 282 units x 3.11 persons/unit). In 2018, the population of the unincorporated area was approximately 311,659 persons (DOF 2018). Thus, the Project would increase the population of the unincorporated area by approximately 0.3 percent to 312,536 people. SCAG projects that the unincorporated area in San Bernardino County would have approximately 344,100 residents in 2040 (SCAG 2016). The Project would not cause the population of unincorporated San Bernardino County to exceed SCAG population forecasts. Therefore, the Project would not conflict with the population forecasts on which the AQMP is based. No significant adverse impacts are identified or anticipated and no mitigation measures are required.

Less than Significant Impact

- b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

The Proposed Project's construction and operational emissions were screened using California Emissions Estimator Model (CalEEMod) version 2016.3.2 prepared by the SCAQMD. CalEEMod was utilized to estimate the on-site and off-site construction emissions. The emissions incorporate Rule 402 and 403 by default as required during construction. The criteria pollutants screened for include, reactive organic gases (ROG), nitrous oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), and particulates (PM₁₀ and PM_{2.5}). Two of the analyzed pollutants, ROG and NO_x, are ozone precursors. Both summer and winter season emission levels were estimated.

In addition to regional thresholds, the SCAQMD has developed Localized Significance Thresholds (LST) in response to concerns about exposure to criteria pollutants in local communities (SCAQMD 2008). LSTs were devised in response to concern regarding exposure of individuals to criteria pollutants in local communities. LSTs represent the maximum emissions from a project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each source receptor area (SRA), project size, and distance to the sensitive receptor. However, LSTs only apply to emissions in a fixed stationary location, including idling emissions during both project construction and operation (SCAQMD 2008). LSTs are not applicable to mobile sources such as cars on a roadway (SCAQMD 2008). LSTs have been developed for NO_x, CO, PM₁₀, and PM_{2.5}. As such, LSTs for operational emissions do not apply to onsite development, as the majority of emissions would be generated by cars on the roadways. LSTs have been developed for emissions in construction areas up to five acres in size. The use of LSTs is voluntary, to be implemented at the discretion of local agencies (SCAQMD 2008). The SCAQMD provides tables for project sites that measure one, two, or five acres.

The Project would disturb approximately a 9.5-acre area. It is unlikely that more than five acres would be under active construction at one time; therefore, this analysis utilizes the five-acre LSTs. The Project Site occurs in Source Receptor Area 35 (SRA-35, East San Bernardino Valley). As described under subsection 2.1.5, *Sensitive Receptors*, the nearest sensitive receptors evaluated in the study included residences, which are currently approved for construction to the east of the Project Site. LSTs are provided for receptors at distances ranging from 82 to 1,640 feet from the Project Site

boundary. According to the SCAQMD’s *Final LST Methodology*, projects with boundaries located closer than 82 feet to the nearest receptor should use the LSTs for receptors located at 82 feet (2008). For the purpose of this analysis, Project construction emissions are compared to construction LSTs.

Construction Emissions

The Project’s construction emissions were calculated using the California Emissions Estimator Model (CalEEMod) software version 2016.3.2 using model defaults for the type and number of pieces of equipment that would be used onsite during each of the construction phases. Additionally, it was assumed that construction of the Project would require the export of approximately 54,600 cubic yards (CY) of material based on applicant provided information. Construction was assumed to start in June 2020. CalEEMod default construction phase lengths were used for the site preparation and paving phases; however, the grading, building construction, and architectural coating phases were extended from the default time frame to reflect a more accurate construction schedule. The grading phase was extended to be triple the default phase length (revised from 20 days to 60 days) to provide a more accurate estimate of material export. The building construction phase was extended as well from 230 days to 300 days and the architectural coating phase was extended to overlap with half of building construction because individual buildings would be painted as construction is completed, representing more realistic construction practices. It was also assumed that the applicant would utilize Tier 3 construction equipment per the requirements of SCAQMD Rule 401 and CARB’s In-use Off-road Diesel-Fueled Fleets Regulation.

Table 1 summarizes maximum daily emissions of pollutants associated with construction of the Proposed Project during each year of construction. Maximum daily estimates account for compliance with the above described requirements, but do not include any additional mitigation. Emissions of CO, PM10, PM2.5, NOX, and ROG would not exceed SCAQMD regional or LSTs, assuming adherence to the conditions listed above required by SCAQMD Rule 403 and 1113.

**Table 1
Construction Emissions Summary
(Pounds per Day)**

Construction Phase	ROG	NO_x	CO	PM₁₀	PM_{2.5}
2020 Maximum lbs/day	2.6	47.0	33.2	9.3	5.5
2021 Maximum lbs/day	18.2	24.2	36.2	5.9	2.3
2022 Maximum lbs/day	16.6	12.9	21.9	1.6	0.9
Maximum lbs/day	18.2	47.0	36.2	9.3	5.5
SCAQMD Threshold	75	100	550	150	55
Thresholds Exceeded?	No	No	No	No	No
Max. on-site lbs/day	15.5	19.1	23.0	9.1	5.4
LSTs (onsite only)	N/A	270	2,075	14	9
Thresholds Exceeded?	N/A	No	No	No	No

Notes: All calculations were made using CalEEMod. Emission data is pulled from “mitigated” results that include compliance with regulations and project design features that will be included in the project.

1 Grading phases incorporate anticipated emissions reductions from the conditions listed above, which are required by SCAQMD Rule 403 to reduce fugitive dust.

2 LSTs are for a 5-acre project in SRA-35 within a distance of 82 feet from the site boundary.

Compliance with SCAQMD Rule 403

For the purposes of construction emissions modeling, it was assumed that the Project would comply with the SCAQMD Rule 403, which identifies measures to reduce fugitive dust and is required to be implemented at all construction sites located in the SCAB. Therefore, the following conditions, which would be required to reduce fugitive dust in compliance with SCAQMD Rule 403, were included in CalEEMod for the site preparation and grading phases of construction.

1. **Minimization of Disturbance.** Construction contractors should minimize the area disturbed by clearing, grading, earth moving, or excavation operations to prevent excessive amounts of dust.
2. **Soil Treatment.** Construction contractors should treat all graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved onsite roadways to minimize fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally safe soil stabilization materials, and/or roll compaction as appropriate. Watering shall be done as often as necessary, and at least twice daily, preferably in the late morning and after work is done for the day.
3. **Soil Stabilization.** Construction contractors should monitor all graded and/or excavated inactive areas of the construction site at least weekly for dust stabilization. Soil stabilization methods, such as water and roll compaction, and environmentally safe dust control materials, shall be applied to portions of the construction site that are inactive for over four days. In addition, a wheel shaker/wheel spreading device consisting of raised dividers (rails, pipe, or grates) at least 24 feet long and 10 feet wide, shall be utilized to remove bulk material from tires and vehicle undercarriages before vehicles exit the site. If no further grading or excavation operations are planned for the area, the area shall be seeded and watered until landscape growth is evident, or periodically treated with environmentally safe dust suppressants, to prevent excessive fugitive dust.
4. **No Grading During High Winds.** Construction contractors should stop all clearing, grading, earth moving, and excavation operations during periods of high winds (20 miles per hour or greater, as measured continuously over a one-hour period).
5. **Street Sweeping.** Construction contractors should sweep all onsite driveways and adjacent streets and roads at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads. Additionally, the model reflected the requirements of SCAQMD Rule 445, which restricts wood burning devices in all new developments within the basin.

Operational Emissions

Operational emissions associated with the proposed Project were also estimated using CalEEMod. Operational emissions include mobile source emissions, energy emissions, and area source emissions. Proposed Project traffic generation rates from the Traffic Impact Analysis prepared by Ganddini Group, Inc. (September 13, 2019) were used in CalEEMod to estimate mobile emissions. Emissions attributed to energy use include natural gas consumption for space and water heating. Area source emissions are generated by landscape maintenance equipment, consumer products and architectural coating.

Table 2 summarizes the Project's operational emissions. The majority of project-related operational emissions would be due to vehicle trips to and from the site. Project-generated emissions would not exceed SCAQMD recommended thresholds for ROG, NO_x, CO, SO₂, PM₁₀, or PM_{2.5}.

Table 2
Project Daily Operational Estimated Emissions
(Pounds Per Day)

Proposed Project¹						
Emission Source	ROG	NO_x	CO	SO₂	PM₁₀	PM_{2.5}
Area	9.2	4.5	25.1	0.1	0.5	0.5
Energy	0.1	1.1	0.4	0.1	0.1	0.1
Mobile	2.4	11.6	28.9	0.1	8.8	2.4
Total Value (lbs/day)	11.7	17.1	54.5	0.1	9.4	3.0
MDAQMD Threshold	55	55	550	150	150	55
Significant	No	No	No	No	No	No

Source: CalEEMod.2016.3.2. Note: Totals may not sum exactly due to rounding.

The Proposed Project does not exceed applicable SCAQMD regional thresholds either during construction or operational activities. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Less than Significant Impact

- c) Expose sensitive receptors to substantial pollutant concentrations?

In *California Building Industry Association v Bay Area Air Quality Management District*, the California Supreme Court held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project (S213478, December 17, 2015). An exception to this general rule is a project that may exacerbate a condition in the existing environment. For such a situation, the lead agency is required to analyze the impact of that exacerbated condition on future residents and users of a project as well as other impacted individuals or resources. For example, a development project could exacerbate hazards relating to wildfire by providing additional fuel and ignition sources, resulting in potential impacts to future residents of the project, existing residents, or resources. Thus, the significance determination with respect to toxic air contaminants focuses on whether the project would exacerbate environmental conditions in a manner that would increase the potential to expose people or resources to environmental impacts. Because the Project is a residential development, project operation would not generate toxic air contaminants, nor would the project substantially increase diesel particulates in the area because it would not attract substantial diesel traffic to the Project Site, like an industrial warehouse or rest area would. Furthermore, as indicated in Table 1, emissions of CO, PM₁₀, PM_{2.5}, NO_x, and ROG during Project construction would not exceed SCAQMD's regional thresholds or LSTs, which are designed to be protective of public health; therefore, the Project would not exacerbate environmental conditions in a manner that would increase the potential to expose sensitive receptors to environmental impacts.

CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* (April 2005) recommends against siting sensitive receptors within 500 feet of a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day. It also recommends against siting receptors within 1,000 feet of distribution centers that accommodate more than 100 diesel trucks per

day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week. The primary concern with respect to heavy-traffic roadway and warehouse adjacency is the long-term effect of diesel exhaust particulates, on sensitive receptors. The Project Site is located approximately 1,000 feet north of I-10 and, therefore, outside of CARB's recommended minimum siting distance of 500 feet. The only roadway within 500 feet of the Project Site is Lugonia Avenue. As documented in the Traffic Impact Analysis prepared for the Project by Gandinni Group, Inc. (2019), average daily vehicle volumes on Lugonia Avenue between California Street and Nevada Street are projected to be approximately 7,800 average daily trips (ADT) under existing plus Project conditions and up to 11,600 ADT under Year 2040 plus Project conditions (Gandinni Group, Inc. 2019). These traffic levels do not meet or exceed the CARB criteria of 100,000 vehicles per day for exposure to diesel particulate matter generated by traffic on adjacent roadways. Therefore, the Project would be consistent with CARB's recommended screening threshold for siting of sensitive receptors near roadways.

The Project would place residences within 1,000 feet of seven warehouses. Two of these warehouses accommodate more than 100 truck trips per day and would exceed CARB's recommended screening threshold. All of the facilities within 1,000 feet of the Project Site are nonrefrigerated based on tenant and property information that indicates they are used for manufacturing of HVAC, auto parts, packaging supplies, and other non-refrigerated uses. Since the facilities are not refrigerated, it is assumed that no trucks with TRUs operate at any of the facilities.

In April 2017, CARB released a technical advisory on how to reduce impacts related to diesel particulate matter entitled, *Strategies to Reduce Air Pollution Exposure near High-Volume Roadways* (CARB 2017b). Although the Project is not exposed to high-volume roadways, the same TAC (diesel particulates) and source of pollutants (heavy duty diesel trucks) are the concern with distribution facilities, and the strategies to reduce impacts from high-volume roadways would be similarly applicable to residences near distribution facilities. CARB envisioned that the advisory would be used by planners and other stakeholders to identify combinations of strategies that can be implemented to reduce exposure at specific developments or to recommend the consideration of these strategies in policy or planning documents. The advisory identifies installation of indoor high efficiency filtration that removes pollution from the air as one of seven strategies for reducing impacts from diesel particulates. The other six strategies do not apply to the Project because they are appropriate for plan level documents.

California building codes [2016 California Energy Code, Section 150.0 (m)(12)(B)] require mechanical ventilation with a minimum filtration efficiency (MERV) 6 in new residential construction (CARB 2017b). MERV 6 filters are medium efficiency filters that remove large particles such as mold spores and cat and dog dander, but do not remove the finer particles produced from heavy duty trucks. MERV 13 high efficiency filters are capable of removing both large and small particulates. According to the advisory, MERV 13 filters remove more than 90 percent of particulates 1.0 to 10 microns in diameter, and more than 75 percent of particulates less than 1.0 microns in diameter. Air Quality Measure-1 is described in Section 4.1.1, *Air Quality Recommendations*, and incorporates recommendations consistent with the strategies identified by CARB's 2017 advisory for reducing exposure to diesel particulate matter from heavy duty trucks. These strategies would provide for the removal of particulates prior to entering into the indoor environment, thereby reducing the overall exposure of future residents. It is also important to note that heavy-duty trucks are prohibited from traveling on Nevada Street east of the Project Site, further reducing future residential exposure to TACs from truck traffic accessing distribution facilities in the vicinity of the Project Site.

As concluded in the Air Quality and Greenhouse Gas Emission Study, the Project would potentially expose onsite residences to TACs associated with adjacent distribution centers. As a result, mitigation would be required to reduce potential impacts to residences on-site associated with emissions of TACs associated with operation of the nearby distribution centers.

AQ-1: Air Filtration and Weatherproofing – The Project Proponent shall incorporate the following air filtration and building weatherproofing measures, consistent with the strategies identified by the California Air Resources Board’s 2017 advisory for reducing exposure to diesel particulate matter from heavy duty trucks:

- Install a central heating, ventilation, and air conditioning (HVAC) system (as is typical of three to four-story suburban residential projects with multiple buildings) that includes high efficiency particulate filters with a MERV rating of 13 for all residential units within 1,000 feet of distribution facility loading docks. Filtration systems must operate to maintain positive pressure within the building interior to prevent entrainment of outdoor air indoors.
- Weatherproof windows and doors with caulking and weather-stripping that is rated to last at least 20 years. Weatherproof should be maintained and replaced by the property owner, as necessary, to ensure functionality for the lifetime of the project.
- Inform occupants regarding the proper use of any installed air filtration system.

Less than Significant Impact with Mitigation Incorporated

- d) Result in substantial emissions (such as odors or dust) adversely affecting a substantial number of people?

The Proposed Project does not contain land uses typically associated with the emission of 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; and the temporary storage of domestic solid waste (refuse) associated with the Proposed Project’s (long-term operational) uses. Standard construction requirements would minimize odor impacts resulting from construction activity. It should be noted that any construction odor emissions generated would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction activity. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the County of San Bernardino’s solid waste regulations. The Project would be also required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

Less than Significant Impact

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

SUBSTANTIATION: (Check if project is located in the Biological Resources Overlay or contains habitat for any species listed in the California Natural Diversity Database):

The proposed Project is not on the Biotic Resources Overlay Map of the County General Plan. A Habitat Assessment dated January 8, 2020 was prepared by ELMT Consulting for the Project Site. Findings of the report are discussed herein. The report is available for review at the County of San Bernardino Land Use Services Department.

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

The CNDDDB and CNPS was queried for reported locations of special-status plant and wildlife species as well as special-status natural plant communities in the Redlands USGS 7.5-minute quadrangle. The record search focused on the Redlands USGS 7.5-minute quadrangle since the proposed Project footprint will be confined to existing disturbed areas and is isolated from undisturbed native habitats. A search of published records of these species was conducted within this quadrangle using the CNDDDB Rarefind 5 online software and CNDDDB Quickview Tool in BIOS, and CNPS Inventory of

Rare, Threatened, and Endangered Plants of California. The habitat assessment evaluated the conditions of the habitat(s) within the boundaries of the Project Site to determine if the existing plant communities have the potential to provide suitable habitat(s) for special-status plant and wildlife species previously documented in the general vicinity of the proposed Project site.

The literature search identified eighteen (18) special-status plant species and forty-eight (48) special-status, and three (3) special-status plant communities as having potential to occur within the Redlands USGS 7.5- minute quadrangle. Special-status plant and wildlife species were evaluated for their potential to occur within the Project Site based on habitat requirements, availability and quality of suitable habitat, and known distributions. Species determined to have the potential to occur within the general vicinity of the Project Site were documented in the Habitat Assessment.

Special-Status Plants - According to the CNDDDB and CNPS, eighteen (18) special-status plant species have been recorded in the Redlands quadrangle. No special-status plant species were observed on-site during the habitat assessment. The Project Site primarily consists of vacant, undeveloped land that has been subject to a variety of anthropogenic disturbances including historic agricultural activities and current, on-going weed abatement activities. These disturbances have eliminated the natural plant communities that once occurred on-site which has removed suitable habitat for special-status plant species known to occur in the general vicinity of the Project Site. Based on habitat requirements for specific special-status plant species and the availability and quality of habitats needed by each species, it was determined that the Project Site does not provide suitable habitat for any of the special-status plant species known to occur in the area and are presumed to be absent from the Project Site. No focused surveys are recommended.

Special-Status Wildlife - According to the CNDDDB, forty-eight (48) special-status wildlife species have been reported in the Redlands quadrangle. No special-status wildlife species were observed on-site during the habitat assessment. As discussed, disturbances have eliminated the natural plant communities that once occurred onsite which has greatly reduced the potential for special-status species to occur on-site. Based on habitat requirements for specific species and the availability and quality of on-site habitats, it was determined that the Project Site has a low potential to support low quality foraging habitat for Cooper's hawk (*Accipiter cooperii*) and California horned lark (*Eremophila alpestris actia*). All remaining special-status wildlife species known to occur in the area were presumed to be absent from the Project Site.

In order to ensure impacts to Cooper's hawk and California horned lark do not occur from implementation of the proposed Project, a pre-construction clearance nesting bird survey shall be conducted prior to ground disturbance (see Mitigation Measure BIO-1 below). With implementation of the pre-construction nesting bird clearance survey, impacts to the Cooper's hawk and California horned lark will be less than significant.

Special-Status Plant Communities - According to the CNDDDB, three (3) special-status plant communities have been reported in the Redlands USGS 7.5-minute quadrangle including: Riversidean Alluvial Fan Sage Scrub, Southern Coast Live Oak Riparian Forest, and Southern Sycamore Alder Riparian Woodland. Based on the results of the field investigation, no special-status plant communities were observed on-site.

Critical Habitat - The Project Site is not located with federally designated Critical Habitat. The nearest designated Critical Habitat is located approximately 1.5 miles north of the Project Site for San Bernardino kangaroo rat (*Dipodomys merriami parvus*) and Santa Ana sucker (*Catostomus santaanae*). Implementation of the proposed Project will not impact Critical Habitat. Therefore, the

loss or adverse modification of Critical Habitat from site development will not occur and consultation with the USFWS for impacts to Critical Habitat will not be required for implementation of the proposed Project.

Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.5, 3511, and 3513 of the California Fish and Game Code prohibit the take, possession, or destruction of birds, their nests or eggs). In order to protect migratory bird species, the following mitigation measure shall be implemented:

Mitigation Measure BIO-1:

A nesting bird clearance survey shall be conducted prior to any ground disturbance or vegetation removal activities that may disrupt the birds during the nesting season. If construction occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds shall be conducted within three (3) days of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction. The biologist conducting the clearance survey shall document a negative survey with a brief letter report indicating that no impacts to active avian nests will occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities should stay outside of a no-disturbance buffer. The size of the no-disturbance buffer (generally 300 feet for migratory and non-migratory song birds and 500 feet raptors and special status species) will be determined by the wildlife biologist, in coordination with the CDFW, and will depend on the level of noise and/or surrounding disturbances, line of sight between the nest and the construction activity, ambient noise, and topographical barriers. These factors will be evaluated on a case-by-case basis when developing buffer distances. Limits of construction to avoid an active nest will be established in the field with flagging, fencing, or other appropriate barriers; and construction personnel will be instructed on the sensitivity of nest areas. A biological monitor shall be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities within the buffer area can occur.

Less than Significant Impact with Mitigation

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

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

There are three key agencies that regulate activities within inland streams, wetlands, and riparian areas in California. The Corps Regulatory Branch regulates discharge of dredge or fill materials into "waters of the United States" pursuant to Section 404 of the Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act. Of the State agencies, the CDFW regulates alterations to streambed and bank under Fish and Wildlife Code Sections 1600 et seq., and the Regional Board regulates discharges into surface waters pursuant to Section 401 of the CWA and the California Porter-Cologne Water Quality Control Act.

No jurisdictional drainage and/or wetland features were observed on the Project Site during the habitat assessment that would be considered jurisdictional by the Corps, Regional Board, or CDFW. Regulatory approvals from the Corps, Regional Board, and/or CDFW will not be required for implementation of the Project. Therefore, no impacts are identified or are anticipated, and no mitigation measures are required.

No Impact

- 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?

Habitat linkages provide connections between larger habitat areas that are separated by development. Wildlife corridors are similar to linkages but provide specific opportunities for animals to disperse or migrate between areas. A corridor can be defined as a linear landscape feature of sufficient width to allow animal movement between two comparatively undisturbed habitat fragments. Adequate cover is essential for a corridor to function as a wildlife movement area. It is possible for a habitat corridor to be adequate for one species yet still inadequate for others. Wildlife corridors are features that allow for the dispersal, seasonal migration, breeding, and foraging of a variety of wildlife species. Additionally, open space can provide a buffer against both human disturbance and natural fluctuations in resources.

The proposed Project will be confined to existing disturbed areas and is surrounded by development, which has removed natural plant communities from the surrounding area. The Project Site is isolated from regional wildlife corridors and linkages, and there are no riparian corridors, creeks, or useful patches of stepping-stone habitat (natural areas) within or connecting the Project Site to any identified wildlife corridors or linkages. The closest regional wildlife corridor is located approximately 1.5 miles north of the Project Site along the Santa Ana River, which is separated from the Project site by existing industrial development. As a result, implementation of the proposed Project will not disrupt or have any adverse effects on any migratory corridors or linkages in the surrounding area. Therefore, no impacts are identified or are anticipated, and no mitigation measures are required.

No Impact

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

There are no local policies or ordinances protecting biological resources that are applicable to the Project site. The site is not located within the Biotic Resources Overlay District of the County General Plan. Therefore, development of the proposed Project would not conflict with local policies or ordinances protecting biotic resources. Therefore, no impacts are identified or are anticipated, and no mitigation measures are required.

No Impact

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

The Project Site is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. There would be no take of critical habitat and, therefore, no land use conflict with existing conservation plans would occur. Therefore, no impacts are identified or are anticipated, and no mitigation measures are required.

No Impact

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
V. CULTURAL RESOURCES - Would the project				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SUBSTANTIATION: (Check if the project is located in the Cultural or Paleontologic Resources overlays or cite results of cultural resource review):

According to the County of San Bernardino General Plan, the Project Site is not located in a Cultural or Paleontological Resources Overlay area. A Cultural Resources Assessment dated April 18, 2019 was prepared for the Project by BCR Consulting LLC.; the text portion of the report is available for review at the County of San Bernardino Land Use Services Department.

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

As part of the Cultural Resources Assessment, BCR Consulting conducted an archaeological records search at the South Central Coastal Information Center. This included a review of all recorded historic and prehistoric cultural resources, as well as a review of known cultural resources, and survey and excavation reports generated from projects completed within one-mile of the Project Site. In addition, a review was conducted of the National Register of Historic Places (National Register), the California Register of Historical Resources (California Register), and documents and inventories from the California Office of Historic Preservation including the lists of California Historical Landmarks, California Points of Historical Interest, Listing of National Register Properties, and the Inventory of Historic Structures.

Data from the South Central Coastal Information Center revealed that 23 cultural resource studies have taken place resulting in the recording of 11 cultural resources (all historic period) within one-mile of the Project Site. None of the previous cultural resource studies have assessed the Project Site, and no cultural resources have been recorded within its boundaries. During the field survey, BCR Consulting staff carefully inspected the Project Site, and identified no cultural resources within

its boundaries. Surface visibility was approximately 95 percent within the Project Site. Sediments included silty sandy alluvium. The Project Site has been subject to disturbances related to citrus cultivation, the subsequent removal of the mature citrus trees and irrigation system followed by grading to stabilize the surface, and construction and maintenance of adjacent roads.

The records search and field survey did not identify any cultural resources (including prehistoric or historic-period archaeological sites or historic buildings) within the Project Site. Furthermore, records search results combined with surface conditions indicate that disturbances have occurred beyond depths at which cultural resources are likely. Based on these results, BCR Consulting concluded that no additional cultural resource work or monitoring is necessary for any earthmoving proposed within the Project Site. Therefore, development of the Project Site is not expected to result in any adverse impacts to historical or archaeological resources.

Although no evidence of historical or cultural resources was discovered, grading and construction activities may uncover resources. Therefore, a possible significant adverse impact has been identified or anticipated and the following mitigation measures are required as a condition of Project approval to reduce the impacts to a level below significant. The required mitigation measure is:

Mitigation Measure CR-1:

If cultural resources are identified during ground-disturbing activities, the Project Proponent shall initiate an archaeological monitoring program that includes the presence of a professional archaeological consultant and a Native American representative culturally associated with the area. If required, the archaeological monitoring program shall be conducted in a manner consistent with current professional policies and guidelines.

Less than Significant with Mitigation Incorporated

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

Construction activities, particularly grading, could potentially disturb human remains interred outside of a formal cemetery. Field surveys conducted as part of the Cultural Resource Assessment did not encounter any evidence of human remains. The Project Site is not located on or near a known cemetery, and no human remains are anticipated to be disturbed during the construction stage. However, a possible significant adverse impact has been identified or anticipated and the following mitigation measure is required as a condition of Project approval to reduce the impact to a level below significant. The required mitigation measure is:

Mitigation Measure CR-2:

If there is any evidence of human remains (or possible human remains), the County Coroner must be notified within 24 hours and permitted to assess the find in situ. If the remains are deemed Native American in origin, the Coroner will notify the Native American Heritage Commission, in accordance with California Public Resources Code Section § 5097.98, and the Most Likely Descendant (MLD) will be identified. Consultation between the project applicant, County, MLD, and consulting archaeologist will determine the disposition of the remains.

All discovered human remains shall be treated with respect and dignity. California state law (California Health & Safety Code § 7050.5) and federal law and regulations ([Archaeological

Resources Protection Act (ARPA) 16 USC 470 & 43 CFR 7], [Native American Graves Protection & Repatriation Act (NAGPRA) 25 USC 3001 & 43 CFR 10] and [Public Lands, Interior 43 CFR 8365.1-7]) require a defined protocol if human remains are discovered in the State of California regardless if the remains are modern or archaeological.

Less than Significant with Mitigation

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
VI. ENERGY - Would the project:				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SUBSTANTIATION:

Building Energy Conservation Standards

The California Energy Conservation and Development Commission (California Energy Commission) adopted Title 24, Part 6, of the California Code of Regulations; energy Conservation Standards for new residential and nonresidential buildings in June 1977 and standards are updated every three years. Title 24 ensures building designs conserve energy. The requirements allow for the opportunities to incorporate updates of new energy efficiency technologies and methods into new developments. In June 2015, the California Energy Commission (CEC) updated the 2016 Building Energy Efficiency Standards. Under the 2016 Standards, residential buildings are approximately 28 percent more energy efficient than the previous 2013 Energy Efficiency Standards. The 2016 Standards improved upon the previous 2013 Standards for new construction of and additions and alterations to residential and nonresidential buildings. The CEC updated the 2019 Building Energy Efficiency Standards in May 2018. The 2022 Building Energy Efficiency Standards will improve upon the 2019 Energy Standards for new construction of, and additions and alterations to residential buildings.

Senate Bill 350

Senate Bill (SB) 350 (de Leon) was signed into law in October 2015. SB 350 establishes new clean energy, clean air and greenhouse gas reduction goals for 2030. SB 350 also establishes tiered increases to the Renewable Portfolio Standard: 40 percent by 2024, 45 percent by 2027, and 50 percent by 2030.

Senate Bill 100

Senate Bill 100 (SB 100) was signed into law September 2018 and increased the required Renewable Portfolio Standards. SB 100 requires the total kilowatt-hours of energy sold by electricity retailers to their end-use customers must consist of at least 50 percent renewable resources by 2026, 60 percent

renewable resources by 2030, and 100 percent renewable resources by 2045. SB 100 also includes a State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

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

Electricity

Southern California Edison (SCE) would provide electricity for the Proposed Project. Currently, the existing Project Site is vacant and does not use electricity. Therefore, development of the Proposed Project would cause a permanent increase in demand for electricity when compared to existing conditions. The CalEEMod model projected that the Proposed apartment complex would consume 1.04 GWh annually. The increased demand is expected to be sufficiently served by the existing SCE electrical facilities. According to the California Energy Commission: Electricity Consumption by Planning Area, SCE residential use consumed 34784.5 GWh in the year 2018 (accessed 4/1/2020). The increase in electricity demand from the project would represent a 0.003 percent of the overall SCE residential consumption. Therefore, projected electrical demand would not significantly impact SCE's level of service.

The Proposed Project has been designed to comply with the 2019 Building Energy Efficiency Standards. The City would review and verify that the Proposed Project plans would be in compliance with the most current version of the Building and Energy Efficiency Standards. The Proposed Project would also be required to adhere to CALGreen, which establishes planning and design standards for sustainable developments, and energy efficiency. Adherence to these requirements would result in the Proposed Project being efficient in terms of energy consumption. The development of the Proposed Project is not anticipated to affect achievement of the 60 percent Renewable Portfolio Standard established in in the current SB 100 (refer to description above). SCE and other electricity retailer's SB 100 goals include that end-user electricity use such as residential and commercial developments use would decrease from current emission estimates. The Proposed Project would not result in a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

Natural Gas

The Proposed Project and surrounding area are serviced by Southern California Gas Company. The Project Site is currently vacant and has no demand on natural gas. Therefore, the development of the Proposed Project will create a permanent increase demand of natural gas. The CalEEMod model projected that the Proposed Project would consume 0.0417193 Therms annually. According to the 2018 California Gas Report by California Gas and Electric Utilities, the Southern California Gas Company multi-family residential use consumed 308 Therms in the year 2018 within the southern California region (accessed 4/1/2020). The increase natural gas demand from the Project would represent a 0.0134 percent of the Southern California Gas Company multi-family residential consumption. Therefore, the natural gas demand from the Proposed Project would represent an insignificant percentage of the overall demand in Southwest Gas Company' service area. Title 24 is a collection of energy standards that address the energy efficiency of new (and altered) homes; the 2022

Building Energy Efficiency Standards will improve upon the 2019 Energy Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The Proposed Project would be built in accordance with the 2019 energy standards of Title 24; therefore, no significant impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation are anticipated and no mitigation measures are recommended. The Proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

Less Than Significant Impact

- b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Project design and post-construction use would comply with the County of San Bernardino Greenhouse Gas Emissions Reduction Plan, and the State Building Energy Efficiency Standards related to appliance efficiency regulations, and green building standards. Project development would not cause inefficient, wasteful and unnecessary energy consumption, and no adverse impact would occur. The Proposed Project would not conflict with any applicable plan, policy or regulation of an agency adopted to reduce GHG emissions, including Title 24, AB 32, and SB 32; therefore, the Project is consistent with AB 32, which aims to decrease emissions statewide to 1990 levels by to 2020. The Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and therefore no impact would occur and no mitigation measures are recommended.

Less Than Significant Impact

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
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VII. GEOLOGY AND SOILS - Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | |
| i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map Issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ii. Strong seismic ground shaking? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iii. Seismic-related ground failure, including liquefaction? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| iv. Landslides? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Result in substantial soil erosion or the loss of topsoil? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| d) Be located on expansive soil, as defined in Table 181-B of the California Building Code (2001) creating substantial direct or indirect risks to life or property? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

SUBSTANTIATION: (Check if project is located in the Geologic Hazards Overlay District):

An Updated Report of Soils and Foundation Evaluations (Soils Report) dated May 22, 2019 was prepared for the Project by Soils Southwest, Inc. A copy of the report is available for review at the County of San Bernardino Land Use Services Department.

- a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

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.

- i) A Soils Report was prepared for the Project in order to identify the Project site’s geotechnical conditions. The Soils Report determined that the Project Site does not lie within a State of California Alquist-Priolo Earthquake Fault Zone. The potential for a surface fault rupture within the Project boundary is considered unlikely since no fault lines intersect the Project Site. The Project Site is located in proximity to a number of faults and has the potential to be subject to severe ground shaking. The closest significant active fault is the San Jacinto-San Bernardino fault zone (Type B Fault), which is approximately four miles southeast of the site. The nearest Type A fault is the San Andreas-Southern fault zone, which is approximately 5.5 miles northwest of the Project Site. While the potential for onsite ground rupture cannot be totally discounted the likelihood of such an occurrence is considered low due to the absence of known faults on-site and in the immediate vicinity. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

Less than Significant Impact

Strong seismic ground shaking?

- ii) Seismic ground shaking is a frequent occurrence throughout San Bernardino County. The subject site is within an area that is subject to strong earthquakes due to its location to the San Andres fault. The site is located within Seismic Zone IV. Structures within this zone must meet the minimum design standards to allow a structure to remain standing after a seismic event. As is required by the Uniform Building Code, construction of the structures on the Proposed Project will comply with the California Building Code (CBC) and would ensure that potential impacts from seismic events are reduced to the least extent possible. As a mandatory condition of Project

approval, the Proposed Project would be required to construct proposed structures in accordance with the California Building Code (CBC) which is established by the California Building Standards Code. The code is also known as Title 24, Part 2 of the California Code of Regulations. The CBC is designed to preclude significant adverse effects associated with strong seismic ground shaking. With mandatory compliance of standard design and construction measures, potential impacts would be reduced to a less than significant and the Proposed Project would not expose people or structures to substantial adverse effects, including loss, injury or death, involving seismic ground shaking. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

Less than Significant Impact

Seismic-related ground failure, including liquefaction?

- iii) Liquefaction is a process whereby strong earthquake shaking causes sediment layers that are saturated with groundwater to lose strength and behave as a fluid. Ground failure associated with liquefaction can result in severe damage to structures. As concluded in the Preliminary Soils Report prepared for the Project Site, groundwater is in excess of 50 feet below ground surface and therefore the Project Site is not at risk for liquefaction. Therefore, based on the geotechnical investigation, impacts from liquefaction are considered less than significant. Therefore, no impacts are identified or are anticipated, and no mitigation measures are required.

No Impact

Landslides?

- iv) The proposed Project would not have any risks associated with landslides. Landslides are the downslope movement of geologic materials. The stability of slopes is related to a variety of factors, including the slope's steepness, the strength of geologic materials, and the characteristics of bedding planes, joints, faults, vegetation, surface water, and groundwater conditions. The Project Site occurs on relatively flat terrain where landslides would not been an issue; therefore, no significant impacts are anticipated with respect to seismic-related (or other) landslide hazards. Therefore, no impacts are identified or are anticipated, and no mitigation measures are required.

No Impact

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

The Project would include approval of erosion control plans prior to the issuance of grading and building permits. Measures to reduce and control erosion of soil during construction and post-construction operation are required by SCAQMD through its Rule 403 for control of fugitive dust, the Regional Water Quality Control Board (RWQCB) under its administration of the State's General Construction Permit, and the County of San Bernardino Public Works Department through its Storm Water Management Program. Implementation of requirements under SCAQMD Rule 403 and the Project dust control mitigation plan would reduce or eliminate the potential for soil erosion due to wind. Implementation of Best Management Practices (BMPs) that would be included in the applicant's Storm Water Pollution Prevention Plan (SWPPP), would reduce soil erosion due to storm water or water associated with construction. Typical BMPs include use of soil binders, mulch, silt

fencing, gravel bag berming, fiber rolls and other similar techniques of soil stabilization and sediment control. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

Less than Significant Impact

- 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?

The Project Site is not located in an area that is geologically unstable or would become unstable as a result of development. As mentioned above, it is unlikely that a landslide, lateral spreading, subsidence, liquefaction or collapse would occur onsite or in the Project vicinity as the area is relatively flat and no such hazards would result. Seismically induced lateral spreading involves lateral movement of soils due to ground shaking. Lateral spreading is demonstrated by near vertical cracks with predominantly horizontal movement of the soil mass involved. As concluded in the Soils Report, since on-site topography is relatively level, the potential for seismically induced lateral spreading is considered remote. No impacts are identified or are anticipated, and no mitigation measures are required.

No Impact

- d) Be located on expansive soil, as defined in Table 181-B of the California Building Code (2001) creating substantial direct or indirect risks to life or property?

The Project Site is not located in an area that has been identified by the County Building and Safety Geologist as having the potential for expansive soils. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

Less than Significant Impact

- 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?

The Project will be served by the City of Redlands Sewer System. No septic tanks or alternative wastewater disposal is proposed. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

No Impact

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

A paleontological overview was prepared by Dr. Samuel McLeod of the Natural History Museum of Los Angeles County for the property immediately east of the Project Site. He noted the Project area is within an area dominated by younger Quaternary alluvium, primarily derived from the Crafton Hills, and fluvial deposits of the Santa Ana River channel. These deposits are not considered conducive to yielding fossil specimens. The Museum has no record of any fossil localities in this area. The nearest find was to the south, in the San Jacinto Valley. However, deep excavation may impact older Quaternary deposits, and the relative depth of the older deposits in this

area are generally below any development impact areas. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

Less Than Significant Impact

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
VIII. GREENHOUSE GAS EMISSIONS - Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SUBSTANTIATION:

According to CEQA Guidelines section 15064.4, when making a determination of the significance of greenhouse gas emissions, the “lead agency shall have discretion to determine, in the context of a particular project, whether to (1) quantify greenhouse gas emissions resulting from a project and/or (2) rely on a qualitative analysis or performance based standards. Moreover, CEQA Guidelines section 15064.7(c) provides that “a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts” on the condition that “the decision of the lead agency to adopt such thresholds is supported by substantial evidence.” An Air Quality and Greenhouse Gas Emission Study, dated December 2019, was prepared for the Project by Rincon Consultants, Inc. A copy of the report is available for review at the County of San Bernardino Land Use Services Department.

San Bernardino County GHG Reduction Plan

In September 2011, the County adopted a Greenhouse Gas Emissions (GHG) Reduction Plan (September 2011) (GHG Plan). The GHG Plan presents a comprehensive set of actions to reduce the County’s internal and external GHG emissions to 15% below current levels (2007 levels) by 2020, consistent with the AB 32 Scoping Plan. GHG emissions impacts are assessed through the GHG Development Review Process (DRP) by applying appropriate reduction requirements as part of the discretionary approval of new development projects. Through its development review process, the County will implement CEQA requiring new development projects to quantify project GHG emissions and adopt feasible mitigation to reduce project emissions below a level of significance. A review standard of 3,000 metric tons of CO₂ equivalent (MTCO₂e) per year is used to identify projects that require the use of Screening Tables or a project-specific technical analysis to quantify and mitigate project emissions. Note that the SCAQMD has an annual threshold of 100,000 tons of CO₂e per year.

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

Many gases make up the group of pollutants that contribute to global climate change. However, three gases are currently evaluated and represent the highest concentration of greenhouse gases (GHGs):

Carbon dioxide (CO₂), Methane (CH₄), and Nitrous oxide (N₂O). A threshold of 3,000 MTCO₂e per year has been adopted by the County of San Bernardino Greenhouse Gas Emissions Reduction Plan (Emissions Reduction Plan).

GHG emissions were estimated using the CalEEMod version 2016.3.2. Construction is anticipated to begin in late-2020 and be completed in 2022. Other parameters which are used to estimate construction emissions such as those associated with worker and vendor trips, and trip lengths were based on the CalEEMod defaults. The operational mobile source emissions were calculated using the Trip Generation Evaluation prepared by Urban Crossroads, which determined that the Proposed Project would generate 1,534 daily drips.

The Project Site occurs within the East Valley Area Plan and has a zoning land use designation of East Valley Special Development (EV/SD) as identified in the San Bernardino County General Plan. The EVSD is intended to allow a mix of residential, commercial, and/or manufacturing activities that maximize the utilization of natural as well as man-made resources. Multi-family residential and commercial projects are permitted in the EV/SD District subject to approval of a Planned Development providing adequate buffering from existing 'high impact' commercial and warehouse projects in the area, and ensuring that the project is provided with adequate amenities and infrastructure improvements. GHG emissions associated with the Proposed Project's construction activities are listed in Table 5. Additionally, GHG emissions associated with the Proposed Project's operational activities combined with the construction phase are listed in Table 6.

**Table 5
Construction GHG Emissions Summary
(MT CO₂e per Year)**

Source/Phase	Project Emissions
2020	674.0
2021	858.3
2022	22.6
Total	1,554.9
Amortized over 30 yrs	51.8
County Threshold	3,000
Significant	No

Source: CalEEMod Version 2016.3.2 Annual

**Table 6
Combined Annual Emissions (MT CO₂e/year)**

Emission Source	Project Emissions
Construction	51.8
Operational	
Area	66.2
Energy	713.2
Mobile (CO ₂ and CH ₄)	1,720.9
Mobile (N ₂ O)	31.7
Waste	57.4
Water	117.2
Total (MTCO₂e)	2,758.4
County Threshold	3,000
Significant	No

Source: CalEEMod 2016.3.2, Annual Emissions

As shown in Table 5 and Table 6, construction and total construction and operational GHG emissions produced from the Proposed Project, would not exceed the County's established GHG thresholds of significance. Therefore, the Proposed Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Furthermore, with implementation of the Conditions of Approval, listed below, the Proposed Project would not conflict with any applicable plan, policy, or regulation of an agency for the purpose of reducing the emissions of greenhouse gases. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

Conditions of Approval

The Project emissions are less than significant; however, the applicant will be required to implement GHG reduction performance standards. The GHG reducing performance standards were developed by the County to improve the energy efficiency, water conservation, vehicle trip reduction potential, and other GHG reducing impacts from all new development approved within the unincorporated portions of San Bernardino County. As such, the following Performance Standards establish the minimum level of compliance that development must meet to assist in meeting the 2020 GHG reduction target identified in the County GHG Emissions Reduction Plan. These Performance Standards apply to all Projects, including those that emit less than 3,000 MTCO₂e per year, and will be included as Conditions of Approval for development projects.

The following are the Performance Standards (Conditions of Approval) that are applicable to the Project:

1. *The "developer" shall submit for review and obtain approval from County Planning of a signed letter agreeing to include as a condition of all construction contracts/subcontracts requirements to reduce GHG emissions and submitting documentation of compliance. The developer/construction contractors shall do the following:*
 - a) *Select construction equipment based on low GHG emissions factors and high-energy efficiency.*
 - b) *All construction equipment engines shall be properly tuned and maintained in accordance with the manufacturers specifications prior to arriving on site and throughout construction duration.*
 - c) *All construction equipment (including electric generators) shall be shut off by work crews when not in use and shall not idle for more than 5 minutes.*

Less than Significant Impact

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

GHG screening was prepared for the Proposed Project by Rincon Consultants, Inc. in December 2019. As part of its Development Review Process, the County of San Bernardino provides GHG screening tables for residential and commercial development in order to evaluate a project's consistency with the County's GHG Emissions Reduction Plan. The screening table lists a suite of emissions reduction measures in categories such as building envelope, indoor space efficiencies, irrigation and landscaping, and solid waste, with each measure assigned a point value commensurate

with its expected emissions reduction. Projects accruing at least 100 points are considered consistent with the GHG Emissions Reduction Plan.

The Proposed Project would incorporate 27 emissions reduction measures outlined in the screening table. In total, the Proposed Project would accrue 142 points, exceeding the 100 point minimum required for consistency with the County's GHG Emissions Reduction Plan. Therefore, the Project would be considered consistent with the plan and impacts related to GHG emissions would be less than significant. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

Less Than Significant Impact

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
IX. HAZARDS AND HAZARDOUS MATERIALS - Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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, will it create a significant hazard or excessive noise to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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, will the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SUBSTANTIATION:

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

Post construction activities of the proposed multi-family residential development would not require the routine transport or use of hazardous materials. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

No Impact

- 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?

Hazardous or toxic materials transported in association with construction of the proposed Project may include items such as oils, paints, and fuels. All materials required during construction would be kept in compliance with State and local regulations and the Contractor would be required to implement Best Management Practices (BMPs). Post-construction activities would include standard maintenance (i.e., landscape upkeep, exterior painting and similar activities) involving the use of commercially available products (e.g., pesticides, herbicides, gas, oil, paint, etc.) the use of which would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accidental release of hazardous materials into the environment. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Less Than Significant Impact

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

There are no schools within one-quarter mile of the Project Site. The residential development will not emit hazardous emissions and there would be no handling of hazardous or acutely hazardous materials, substances, or waste. The storage and use of hazardous materials is not associated with residential development. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

No Impact

- 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, will it create a significant hazard or excessive noise to the public or the environment?

The Project Site is not located on site included on the list of hazardous material sites compiled pursuant to Government Code Section 65962.5 by the California Department of Toxic Substances Control's EnviroStor data management system (accessed March 13, 2020). Therefore, no significant impacts are identified or anticipated and no mitigation measures are required.

No Impact

- 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, will the project result in a safety hazard or excessive noise for people residing or working in the project area?

The Project site is located approximately 1.5 miles south of the San Bernardino International Airport (SBIA) and is within the Airport Influence Area of the SBIA. For most civilian airports this distance equals 9,000 feet from the runway primary surface. Future residents of the proposed Project will not be subject to significant risk since the Project Site is not within the landing or takeoff zones of the airport runways. An Airport Comprehensive Land Use Plan (ACLUP) has not been adopted for the SBIA but is in preparation. Pending adoption of the ACLUP, Project plans are referred to SBIA staff for compatibility reviews utilizing the Airport Layout Plan. On-site structures would not exceed 35 feet as permitted in the EV/SD land use zoning district. Mitigation measures are proposed to ensure compatibility with operations of SBIA.

Outside of the San Bernardino International Airport Influence Area the closest airstrip is Redlands Municipal Airport located approximately 3.5 miles east of the Project site. The site is within the Airport Safety Review Area (AR-3) Overlay District and the Project will be required to comply with the AR-3 standards of the County Development Code and incorporated here as the following mitigation measures.

Mitigation Measure HAZ-1:

AR3 Operational Requirements. The Project site is within an Airport Safety Review Area Three (AR3) Overlay, therefore the following standards and criteria shall apply to all operations, structures, and land uses:

- a) *All structures and land uses shall be designed and operated so that they shall not reflect glare, emit electronic interference, produce smoke, or store or dispense hazardous materials in such a manner that would endanger aircraft operations or public safety in the event of an aircraft accident. (to be confirmed prior to issuance of building permits)*
- b) *Vegetation shall be maintained not to exceed the height limitations established in Federal Aviation Regulations (FAR) Part 77, unless otherwise provided by Form 7460-1)*
- c) *The “developer”/property owner shall include with all lease and rental agreements and separately to all renters, tenants, lessees or buyers; information that the site is subject to aircraft overflight from the appropriate airport, is subject to the potential noise problems associated with aircraft operations, and is subject to an Avigation and Noise Easement.*
- d) *Proposed uses and structures shall be consistent with the San Bernardino International Airport Comprehensive Land Use Plan (ACLUP).*

Mitigation Measure HAZ-2:

The Project is within the Airport Safety Review Area Three (AR-3) Overlay. The developer shall grant an Avigation and Noise Easement to the San Bernardino International Airport. The developer shall submit copies of the proposed Avigation & Noise Easement to both County Planning and the affected airport for review and approval. Also, notice shall be provided to any renters, lessees or buyers of the subject property that the site is subject to this Avigation and Noise Easement and that there will be aircraft over-flight with potential noise problems associated with aircraft operations. This information shall be incorporated into the CC & R's, if any, and in all lease and rental agreements.

Less Than Significant Impact with Mitigation Incorporated

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

The Project will not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, because the Project has adequate access from two or more directions via Lugonia Avenue and the approved multi-family residential development to the immediate east. Therefore, no impacts are identified or are anticipated, and no mitigation measures are required.

No Impact

- g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

The Project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires, because there are no wildlands adjacent to this site. The Project Site is in an urban area and is not located in a fire safety overlay district. Therefore, it is not adjacent to wildlands or near the wildlands/urban interface, and will not expose people, structures or infrastructure to risks of wildland fires. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

No Impact

<i>Issues</i>		<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
IX	HYDROLOGY AND WATER QUALITY - Would the project:				

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| iv) impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

SUBSTANTIATION:

A Preliminary Drainage Study and a Preliminary Water Quality Management Plan (WQMP) were prepared for the Project by Transtech Engineers, Inc., in December 2018. The Project is not located in a Flood Hazard Overlay District, as defined by the General Plan, or in a Flood Zone, as mapped by FEMA.

- a,e) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

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

The Project will not violate any water quality standards or waste discharge requirements; the Preliminary Drainage Study and Water Quality Management Plan (WQMP) have been approved by the San Bernardino County Land Use Services Department - Land Development Division.

The Project is required to submit and implement an erosion control plan, and construction will be subject to a Storm Water Pollution Protection Plan (SWPPP) to ensure that no erosion or sedimentation will result from the Project. The City of Redlands has indicated that there is currently sufficient capacity in the existing water system to serve the anticipated needs of the project, in conformance with the City’s Urban Water Management Plan. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

Less than Significant Impact

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

The Project will not 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. The Site plan includes the retention of approximately 33 percent of the site area as pervious surfaces. The Project would be served by the City of Redlands which relies on groundwater for the majority of its supply. The City that has indicated that there is currently sufficient capacity in the existing water system to serve the anticipated needs of the project, in conformance with the City’s Urban Water Management Plan. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

Less than Significant Impact

- i-iv) result in substantial erosion or siltation on- or off-site;

substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

impede or redirect flood flows?

Natural drainage on the site tends to flow in a southeasterly to northwesterly direction. Natural slope across the site is approximately two percent. There are not any natural drainage courses on the site due to former citrus groves and flows tend to be sheet flow. Runoff from the site is conveyed along the sides of the streets in a westerly and northerly direction. The Project Site is fronted on the south side by Lugonia Avenue, classified as a County major arterial roadway. Street improvements to this section of Lugonia Avenue have not been completed. Drainage improvements consist of partially constructed curbs and gutters, modified concrete drainage swales and unimproved drainage swales. An underground storm drain system that is part of the regional master drainage facilities has been installed in Lugonia Avenue. The Project Site is bounded on the north and west by industrial development and associated parking lots, and on the east by vacant land that has been recently approved for a multi-family residential development.

The site topography slopes at 1% - 2% from the southeast to the northwest across the property. Existing flows sheet flow north westerly across the property. There are no drainage facilities along the north western portion of the site. Therefore, the drainage design for the project will convey storm water flows to the master drainage storm drain system in Lugonia Avenue. Runoff from roof tops, parking areas, hardscape and other impervious surfaces will be directed to the on-site catch basins via vegetated drainage swales and then to curbs and gutters. Flows from the Project Site will be conveyed via the on-site storm drain system to underground infiltration/detention chambers located throughout the Project Site. The water quality volumes will be infiltrated into the underlying soils under the parking areas and in the landscaped areas. Storm water flows greater than the water quality storm event would be detained in the underground detention chambers. The Project will not substantially alter the existing drainage pattern of the site or area, including 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. The Project does not propose any substantial alteration to a drainage pattern. There is no stream or river on the site or in the vicinity that would be affected by construction of the Project.

Less than Significant Impact

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

The Project Site is approximately 7.5 miles downstream of the Seven Oaks Dam. The dam was constructed on the Santa Ana River to Seven Oaks is designed to withstand an 8.3 M earthquake and to protect downstream properties from 350-year flood events. The Project will not be impacted by inundation by seiche, tsunami, or mudflow, because the Project is not adjacent to any body of water that has the potential of seiche or tsunami. With protective levees in place along the Santa Ana River to the north, the Project Site is not in the path of any potential mudflow. Therefore, no impacts are identified or are anticipated, and no mitigation measures are required.

No Impact

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
XI. LAND USE AND PLANNING - Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SUBSTANTIATION:

- a) Physically divide an established community?

Implementation of the proposed Project would not physically divide an established community, as the proposed Project is proposed in an urbanized area planned for a mix of commercial, industrial and residential land uses. The Project occurs in the Special Development (SD) land use zoning district of the East Valley Area Plan (EVAP), which is intended to allow a mix of residential, commercial, and/or manufacturing activities that maximize the utilization of natural as well as man-made resources. Multi-family residential uses are permitted uses in the SD District subject to approval of a Planned Development, when adequate buffering is provided from existing 'high impact' commercial and warehouse projects in the area and ensuring that the Project is provided with adequate amenities and infrastructure improvements.

The Proposed Project would provide greater connectivity between the existing community by integrating residential uses within walking and biking distance of local retail uses and employers, resulting in reduced vehicle trips and vehicle miles traveled. The Project Site occurs in close proximity to a regional shopping district (i.e., Citrus Plaza and Mountain Grove), and approximately two miles northeast of ESRI and Loma Linda University Medical Center, major employers in the area. The proposed Project is sited and designed to enhance and be integrated with an established community. Therefore, no impacts have been identified or are anticipated, and no mitigation measures are required.

No Impact

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

The Project would not 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, because the Project is consistent with all applicable land use policies and regulations of the County Development Code, General Plan and the East Valley Area Plan. The Project would comply with all hazard protection, resource preservation and land use modifying Overlay District regulations. As previously described, the Project site is designated as EV/SD and the proposed use is consistent with that designation, subject to the preparation and approval of a Planned Development application, as proposed. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

Less Than Significant Impact

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
XII. MINERAL RESOURCES - Would the project:				
a) Result in the loss of availability of a known mineral resource that will be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SUBSTANTIATION: (Check if project is located within the Mineral Resource Zone Overlay):

- a) Result in the loss of availability of a known mineral resource that will be of value to the region and the residents of the state?

The Project will not result in the loss of availability of a known mineral resource that will be of value to the region and the residents of the state, because there are no identified important mineral resources on the Project Site and the site is not within a Mineral Resource Zone Overlay. Mineral extraction would be incompatible with existing and planned land uses in the area. Local aggregate resources are commercially available in the southern California region without constraint and the Project Site is not located within an area classified as containing aggregate resources. Therefore, no impacts have been identified or are anticipated, and no mitigation measures are required.

No impact

- 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?

The Project 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, because there are no identified locally important mineral resources on the Project site. The underlying soils in the area could be recovered, but the surrounding area has already been developed with primarily commercial and industrial uses and it is impractical to recover those resources. As such the area has not been identified as a locally important mineral resource. Therefore, no impacts have been identified or are anticipated, and no mitigation measures are required.

No impact

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
XIII. NOISE - Would the project result in:				
The Project Site is not located in a Noise Hazard (NH) Overlay District and is not subject to severe noise levels according to the County General Plan Noise Element. A Noise Impact Analysis was prepared for the Project by Rincon Consultants, Inc. dated December 2019.				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

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

SUBSTANTIATION: (Check if the project is located in the Noise Hazard Overlay District or is subject to severe noise levels according to the General Plan Noise Element):

A Noise Study was prepared for the Project by Rincon Consultants, in December 2019. A copy of the report is available for review at the County of San Bernardino Land Use Services Department.

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

The Project would generate temporary noise from site preparation and grading; construction of five multi-family residential buildings, carports and garages, a pool and clubhouse; and paving of parking areas. Construction is anticipated to last approximately 24 months. The Project Site is surrounded by industrial development to the north and west, commercial offices to the south across Lugonia Avenue, and proposed residential development to the immediate east of the Project Site. Proposed residences to the east share a property line with the Project Site and would be the nearest noise-sensitive receptors during project construction. Therefore, for worst-case purposes, the Noise Analysis addressed construction noise levels as being conservatively modeled at the property line for the proposed residential receptors. Given the size of the Project Site and configuration of proposed site improvements, construction activities would occur, on average, approximately 330 feet from the adjacent residential property line. Typical heavy construction equipment would include bulldozers, excavators, dump trucks, front-end loaders, graders, and stationary equipment, such as compressors and generators. It is assumed that diesel engines would power all construction equipment. Noise levels were estimated based on three loaders/backhoes, a dozer, a grader, and an excavator operating simultaneously.

Construction noise was estimated using the FHWA Roadway Construction Noise Model (RCNM) (2006). The RCNM estimate the maximum hourly noise levels to be approximately 85 Leq at 50 feet, as measured from the center of the construction site or activity. At 330 feet from these activities (noise levels would attenuate to approximately 68 dBA Leq. While this noise level is less than ambient levels measured near the southern boundary of the Project Site, which is dominated by roadway noise along Lugonia Avenue, construction noise would exceed ambient noise levels measured further north on the Project Site by approximately 12 dBA.

The County exempts noise associated with construction activities from noise ordinance standards as long as such activities occur between the hours of 7:00 a.m. and 7:00 p.m., and not on Sundays and holidays. Compliance with the construction restrictions contained in the County Development Code would result in less than significant effects to residences during normal sleep hours and would not represent a substantial, temporary increase in ambient noise levels. Nevertheless, standard

construction noise mitigation as provided in Mitigation Measure N-1 below would reduce potential impacts to a less than significant level.

Exterior Noise

Existing ambient noise on the Project Site is as high as 70.0 dBA Leq along Lugonia Avenue. Peak hourly Leq is approximately equivalent to the daily CNEL in a suburban setting (State Water Resources Control Board 1999). Therefore, noise on the Project Site is approximately 70 CNEL, primarily due to traffic. Table 83-3 of the San Bernardino County Code describes exterior and interior noise standards for adjacent mobile noise sources. For multi-family residential buildings, the exterior noise standard is 60 CNEL (or 65 CNEL with reasonable application of best available noise reduction technology) and the Code notes that this exterior standard applies only to private balconies or patios (Table 83-3 of the San Bernardino County Code). The project's proposed residential buildings would be situated around four interior courtyards. Private balconies and patios would be oriented toward these interior courtyards and away from Lugonia Avenue. While the Project Site is exposed to noise levels up to 70.0 CNEL along Lugonia Avenue, noise levels would be lower at residences and outdoor use areas because they are located further from Lugonia Avenue. Based on a 3 dBA attenuation rate for mobile sources and a minimum 5 dBA reduction due to intervening structures (FHWA 2011), noise levels at the private balconies nearest Lugonia Avenue would be approximately 59.0 CNEL. Other private balconies and patios would be located further from Lugonia Avenue and would experience lower noise levels. As a result, noise levels at exterior use areas would not exceed the County's 60 CNEL exterior noise standard for roadway noise.

Interior Noise

Proposed residences nearest to Lugonia Avenue would be located approximately 70 feet from the roadway. Therefore, roadway noise would be approximately 65 CNEL at the exterior of these residences, assuming an attenuation rate of 3 dBA. Applying an exterior-to-interior noise reduction of approximately 25 dBA (FHWA 2011), which is typical for standard construction with closed doors and windows, the interior of residential units would have a noise level of approximately 40 CNEL. Residences located farther from Lugonia Avenue would be exposed to lower levels of roadway noise and, thus, would have a lower interior noise level. Proposed residences would not be exposed to interior noise from mobile sources exceeding the County standard of 45 CNEL.

Stationary Source Noise Exposure

In addition to roadway noise, the County of San Bernardino has adopted standards for noise exposure from stationary noise sources. The nearest stationary noise generators in the vicinity of the Project Site are the distribution centers directly north and west. Ambient noise in the northern portion of the Project Site was measured at 56.1 dBA based on NM 2, which captured circulation of seven heavy duty trucks (3+ axel) at the northern distribution center during the 15-minute measurement. Ambient noise in the western portion of the Project Site was measured at 56.8 dBA based on NM 3, which captured circulation of five heavy duty trucks at the western distribution center. A previous traffic study conducted by Kunzman Associates, Inc. for the distribution center to the north estimates the distribution center generates approximately 20 peak hour truck trips daily (Kunzman Associates, Inc. 2012). Therefore, the truck circulation captured by these noise measurements is in line with typical distribution center operations and may provide a conservative estimate of noise generated by adjacent distribution centers.

The primary source of noise throughout the Project Site is traffic from Lugonia Avenue and I-10 to the south. Ambient noise measurements collected at the site are consistent with attenuated noise levels from these mobile sources. As shown in the Project Site plan (see Figure 3), the northern and western portions of the Project Site would be developed with open parking and garage uses. The nearest proposed residential receptors would be located approximately 50 feet from the distribution center to the west and approximately 70 feet from the distribution center to the north, allowing for attenuation of distribution center noise. Furthermore, all noise measurements were collected during the morning peak hour. Distribution center operations would be diminished during the overnight hours. Given that area roadways are the primary sources of noise on the Project Site, noise from adjacent distribution centers (stationary noise sources) does not contribute substantially to existing noise levels on the Project Site and would not expose residential uses to stationary source noise in excess of the County standards of 55 dBA Leq during the day or 45 dBA Leq at night.

Roadway Noise Impacts

Traffic along Lugonia Avenue and I-10 is the primary source of noise in the Project vicinity and the Project would incrementally increase traffic on the local roadway network. The analysis of anticipated roadway noise impacts is based on the TIA for the Project prepared by Ganddini (2019). The Project would generate a total of 1,534 daily trips, including 102 AM and 124 PM peak hour trips (Ganddini 2019a). The majority of Project traffic would use Lugonia Avenue between California Street and Nevada Street, resulting in an increase of approximately 21 percent. Traffic noise would increase roadway noise by up to 0.8 dBA, which is below the 3 dBA threshold of perception and would not represent a substantial permanent increase in ambient noise levels.

Project construction would temporarily increase noise and vibration in the area but would not expose residents to noise levels or vibration levels outside of the County's standards as long as construction occurs within the adopted construction hours of 7:00 a.m. to 7:00 p.m., except for Sundays and holidays. As described in Section 3.2.3, *Long Term Operational Noise Impacts*, HVAC units associated with proposed residential buildings on the eastern side of the Project Site would have the potential to exceed the County's 45 dBA Leq standard for stationary sources at future residences approved to the east. Therefore, Mitigation Measure N-1 is recommended to reduce noise impacts on residential receptors to the east associated with HVAC units installed as part of the project.

Mitigation Measure N-1:

HVAC Siting and Shielding - Site rooftop mounted HVAC equipment on the eastern-most residential building (Building 1) on the western portion of the building, at least 270 feet from future residential receptors to be constructed to the east. If rooftop-mounted HVAC units cannot be constructed in the western portion of the building, enclose the units with a screen or parapet. To be an effective noise barrier, the screen or parapet shall be extended at least one foot above the rooftop unit and be of sufficient length to block line-of-sight between the HVAC units and future off-site residences. The screen shall be designed to achieve at least a 4 dBA reduction.

Less Than Significant Impact with Mitigation Incorporated

- b) Generation of excessive groundborne vibration or groundborne noise levels?

Vibration sensitive receivers are similar to noise sensitive receivers, such as residences, and institutional uses, such as schools, churches, and hospitals. However, vibration sensitive receivers also

include buildings where vibrations may interfere with vibration-sensitive equipment, including levels that may be well below those associated with human annoyance.

Certain types of construction equipment can generate high levels of groundborne vibration. Construction of the proposed project would utilize vibration equipment including dozers, loaded trucks, and jackhammers during most construction phases. Use of this equipment may occur at the property line of the project site. As discussed in the Noise Analysis prepared for the Project, large bulldozers, loaded trucks, and jackhammers all generate groundborne vibration below 0.1 inches/second PPV at a reference distance of 25 feet. Therefore, operation of construction equipment would not generate groundborne vibration in excess of the County’s 0.2 inches/second PPV standard. Furthermore, construction-related vibration is exempt from the County’s standard as long as it occurs between the hours of 7:00 a.m. and 7:00 p.m., Monday through Saturday, pursuant to Section 83.01.090 of the San Bernardino County Development Code. Therefore, construction-related vibration impacts would be less than significant. The Project does not include any substantial vibration sources associated with operation. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

Less Than Significant Impact

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

The Project is located within the airport land use plan area of the San Bernardino International Airport (SBIA), formerly Norton Air Force Base. The airport is used minimally for cargo planes, the fire department, and small private planes. The proposed Project is approximately 1.8 miles from the airport runway, outside the 65 CNEL noise contour mapped for SBIA. Therefore, considering the Project’s proximity to this airport it is not expected that persons residing and working at the Project will be exposed to excessive noise levels. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

Less than Significant Impact

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
XIV. POPULATION AND HOUSING - Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SUBSTANTIATION:

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

The proposed Project is not expected to induce substantial population growth in the area, either directly or indirectly, because the projected Maximum Population Density Average (MPDA) of the Project is below the MPDA limits of the Special Development (SD) District of the County General Plan.

The MPDA of the SD District is 43,187 persons per square-mile in the Valley Region of San Bernardino County. This equates to 67.5 persons per acre. The proposed Project is 9.5 acres, which would allow for a maximum population of 614 persons in the SD District. Based on the 2010 Census for San Bernardino County, the average household size of renter-occupied housing units is 3.4 persons per unit. This is a Countywide average that does not take into consideration either lower or higher averages of specific geographic areas in the County. The proposed Project is located in the East Valley Area Plan. The nearest community to the Project Site is the City of Redlands. Based on the 2010 Census for the City of Redlands, the average household size of renter occupied units is 2.61 persons per unit. This ratio is more specific to this region than the Countywide average of 3.4 units per acre and is anticipated to be even lower (threshold of 2.0 persons per unit) with the proposed Project given that a majority of the units are studio and 1-bedroom.

Using the City of Redlands Census data of 2.61 persons per unit and considering the unit types proposed, the maximum anticipated number of residents would be 887. This projected population is much lower than the Countywide average of 3.4 persons per unit or a maximum population of 1,156 persons. The projected 887 persons within the SD district, which is substantially developed with commercial and industrial land uses, the development of the Project would not exceed the MPDA for the overall SD district, thereby keeping the population of the area well under the average contemplated in the General Plan.

Growth induced by a Project could be considered a significant impact if it directly or indirectly affects the ability of public agencies to provide services. Public services for the Project will be provided by a number of public agencies, including the County of San Bernardino and the City of Redlands. Infrastructure exists in the immediate vicinity and no service provider has indicated an inability to serve the Project. There are benefits derived from the Project as it provides a 'transit oriented' environment and generous on-site amenities that reduce the dependency or need for residents to utilize existing and more traditional community services. Therefore, the population growth associated with the proposed Project is less than significant and no impacts are identified or anticipated, and no mitigation is required.

Less than Significant Impact

- b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The proposed Project would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere because the Project site is currently undeveloped. Therefore, no impacts are identified or anticipated, and no mitigation measure is required.

No Impact

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
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XV. PUBLIC SERVICES

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

Fire Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other Public Facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SUBSTANTIATION:

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

Fire Protection

Fire protection services for the proposed Project will be provided by the City of Redlands Fire Department. There are three City of Redlands fire stations within a 10-minute response time of the Project site. The closest fire station is located at 1270 Park Street, which is 1.7 miles from the Project with a 5-minute response time. The proposed Project will generate additional need for fire protection but is not expected to require additional services beyond those currently available and planned. Additionally, developer impact fees will be collected at the time of building permit issuance to provide funding for necessary service increases associated with growth and development. Therefore, no impacts have been identified or are anticipated, and no mitigation measures are required.

Less than Significant Impact

Police Protection

Police services for the proposed Project will be provided by the City of Redlands Police Department. The proposed Project will generate additional need for police protection but is not expected to require additional services beyond those currently available. Standard lighting and crime prevention through

environmental design will be integrated into landscaping plans and other Project design features, which will serve as a safety feature and as a crime deterrent. The Project is proposed as gated community, which will further deter crime. Additionally, developer impact fees will be collected at the time of building permit issuance to provide funding for necessary service increases associated with growth and development. Therefore, no impacts have been identified or are anticipated, and no mitigation measures are required.

Less than Significant Impact

Schools

School services for the Project Site are provided by the Redlands Unified School District, including bus services to elementary and middle schools. The average multi-family student generation rate of 0.15 elementary school students per unit would yield 42 elementary school students from the proposed Project, who would attend Victoria Elementary School located at 1505 Richardson Street in San Bernardino. Victoria Elementary is approximately 2.25 miles from the Project. Middle school multi-family student generation at 0.06 students per unit will contribute 17 middle school students from the Project Site to attend Beattie Middle School, which is in the Redlands School District. Beattie Middle School is located at 7800 Orange Street in the City of Highland, approximately three miles north of the Project Site. High school students from the Project Site may attend Citrus Valley High School or Redlands High School, both in the Redlands School District. Citrus Valley High is located at 800 West Pioneer Avenue in Redlands and is approximately 1.5 miles northeast of the Project. Redlands High is located at 840 Citrus Avenue in Redlands and is approximately 2.5 miles east of the Project. The multi-family student generation rate of 0.08 high school students per unit would result in 23 high school students from the Project Site. The School District will receive School Fees to offset the cost of providing school facilities for these students of all levels. Therefore, no impacts have been identified or are anticipated, and no mitigation measures are required.

Less than Significant Impact

Parks

The Project will be provided with an abundance of recreational facilities on site including a 7,584 square-foot clubhouse and a 1,000 square-foot pool house. The clubhouse/pool house buildings will include a leasing office, business center, clubhouse, fitness center, pool bathrooms and pool equipment room. A permanent non-leasable model unit and rooftop deck will be located above the fitness center. The Project also includes open space and recreation areas consisting of landscape courtyards, dog park, picnic and barbeque areas, water features and several outdoor dining areas. The total landscaped and open space area consists of 3.07 acres, which is 33.7 percent of the site area. The Santa Ana River Trail, a regional recreation trail, is located approximately one-mile from the Project Site. Therefore, no impacts have been identified or are anticipated, and no mitigation measures are required.

Less Than Significant Impact

Other Public Facilities

The County Department of Public Works maintains most roads, drainage easements and regional flood control facilities in the general Project vicinity. The City of Redlands will provide police, fire, as well as water and sewer service to the Project Site per an existing agreement between the County and

the City. Therefore, no impacts have been identified or anticipated, and no mitigation measure is required.

No Impact

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
XVI. RECREATION				
a) Will the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility will occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SUBSTANTIATION:

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

The proposed 282-unit multi-family residential Project is not expected to result in an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. The Project includes a 7,584 square-foot clubhouse and a 1,000 square-foot pool house. The clubhouse/pool house buildings will include a leasing office, business center, clubhouse, fitness center, pool bathrooms and pool equipment room. The Project also includes open space and recreation areas consisting of landscape courtyards, dog park, picnic and barbeque areas, water features and several outdoor dining areas. The total landscaped and open space area consists of 3.52 acres, which is 38.2 percent of the site area. These recreational facilities will meet neighborhood park needs of future residents. It is anticipated that the Project's residential units will be predominantly occupied by young and mature adults without children and therefore will have limited impacts on community parks. Community parks are available throughout the City of Redlands. Existing regional parks are adequate to handle regional park needs of future residents in the 282 apartment units. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

Less Than Significant Impact

- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The Project includes a 7,584 square-foot clubhouse and a 1,000 square-foot pool house. The clubhouse/pool house buildings will include a leasing office, business center, clubhouse, fitness center, pool bathrooms and pool equipment room. The Project also includes open space and recreation areas consisting of landscape courtyards, dog park, picnic and barbeque areas, water features and several outdoor dining areas. The Project also includes open space and recreation areas consisting of landscape courtyards, dog park, picnic and barbeque areas, water features and several outdoor dining

areas. These recreational facilities will not have an adverse physical effect on the environment. The Project does not require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. Therefore, no impacts have been identified or are anticipated, and no mitigation measures are required.

Less than Significant

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
XVII. TRANSPORTATION – Would the project:				
a) Conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SUBSTANTIATION:

A Traffic Impact Analysis (TIA) was prepared for the Project by Ganddini Group, Inc. dated April 5, 2019 and revised September 13, 2019; the document is available for review at the County of San Bernardino Land Use Services Department.

a, b) Conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths?

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

The TIA was prepared to provide an assessment of traffic operations resulting from implementation of the proposed Project and to identify measures necessary to mitigate potentially significant traffic impacts. This report analyzes traffic impacts for the anticipated project opening in Year 2020, a reciprocal access condition in Year 2022, and for a Year 2040 scenario reflective of the County of San Bernardino General Plan buildout.

The study intersections currently operate within acceptable Levels of Service (D or better for San Bernardino County and C or better for City of Redlands) during the peak hours for Existing conditions, except California Street at I-10 Westbound Ramps (AM peak hour), that currently operates at Level of Service E. The necessary improvements to bring the intersection operations back to an acceptable Level of Service have been identified in the County of San Bernardino Nexus Program. The unsignalized study intersection at Nevada Street at Lugonia Avenue (AM/PM peak hour) currently

satisfies the California Manual on Uniform Traffic Control Devices (2014) peak hour volume warrant (Warrant 3).

The Project is estimated to generate a total of approximately 1,534 daily drips with approximately 102 AM peak hour trips and 124 PM peak hour trips.

Existing Plus Project conditions for the study intersections are forecast to operate within acceptable Levels of Service (D or better for San Bernardino County and C or better for City of Redlands) during the peak hours for Existing Plus Project conditions, except for the following study intersection that is forecast to operate at Level of Service E, without improvements:

- California Street at I-10 Westbound Ramps - #2 (AM peak hour)
- Nevada Street at Lugonia Avenue - #7 (PM peak hour)

Opening Year (2020) Without Project: The study intersections are forecast to operate within acceptable Levels of Service (D or better for San Bernardino County and C or better for City of Redlands) during the peak hours for Opening Year (2020) Without Project traffic conditions, with improvements.

Opening Year (2020) With Project: The study intersections are forecast to operate within acceptable Levels of Service (D or better for San Bernardino County and C or better for City of Redlands) during the peak hours for Opening Year (2020) With Project conditions, with improvements.

Year 2022 Without Project: The study intersections are forecast to operate within acceptable Levels of Service (D or better for San Bernardino County and C or better for City of Redlands) during the peak hours for Year 2022 Without Project conditions, with improvements.

Year 2022 With Project and Reciprocal Access: The study intersections are forecast to operate within acceptable Levels of Service (D or better for San Bernardino County and C or better for City of Redlands) during the peak hours for Year 2022 With Project With Reciprocal Access conditions, with improvements.

General Plan Buildout (Year 2040) Without Project: The study intersections are forecast to operate within acceptable Levels of Service (D or better for San Bernardino County and C or better for City of Redlands) during the peak hours for General Plan Buildout (Year 2040) Without Project conditions, with improvements.

General Plan Buildout (Year 2040) With Project: The study intersections are forecast to operate within acceptable Levels of Service (D or better for San Bernardino County and C or better for City of Redlands) during the peak hours for General Plan Buildout (Year 2040) With Project conditions, with improvements.

General Plan Buildout (Year 2040) With Project With Reciprocal Access: Therefore, the study intersections are forecast to operate within acceptable Levels of Service (D or better for San Bernardino County and C or better for City of Redlands) during the peak hours for General Plan Buildout (Year 2040) With Project With Reciprocal Access conditions, with improvements.

The following improvements are recommended to maintain acceptable Levels of Service at the study intersections for Existing Plus Project traffic conditions at Nevada Street at Lugonia Avenue including:

- Install a traffic signal.
- Construct one southbound left turn lane.
- Construct one southbound right turn lane.
- Restripe northbound shared left-through lane to 1-left turn lane and 1-through-right lane.
- Restripe eastbound shared left-through lane to 1-left turn lane and 1-through with right lane.
- Restripe westbound shared left-through lane to 1-left turn, 1-through lane and 1-through-right lane.

The necessary improvements to bring the intersection (California Street at I-10 Westbound Ramps) operations back to an acceptable Level of Service have been identified in the County of San Bernardino Nexus Program. Since the intersection is currently deficient, the Project impact is considered indirect/cumulative. The Project fair share is based on the proportion of project peak hour traffic volume contributed to the improvement location relative to the total new peak hour traffic volume for General Plan Buildout (Year 2040) With Project traffic conditions. The cost estimates for the identified improvements have been obtained from the County of San Bernardino Congestion Management Program (2003 Update). The necessary improvements to bring the study area intersection operations back to an acceptable Level of Service have been identified in the County of San Bernardino Nexus Program for the following intersections: California Street at I-10 Westbound Ramps; Interchange improvements for: California Street at I-10 Eastbound Ramps, and traffic signal installation at Nevada Street at Lugonia Avenue.

Non-program improvements required to mitigate impacts of the Project are detailed in the TIA, and the project's fair share contributions toward the cost of the improvements are provided herein as mitigation measures:

Mitigation Measure TC-1:

The Project Proponent shall contribute its share of the cost to construct the necessary improvements through payment of applicable development impact fees. The Project proportional trip contributions have been calculated and the Project fair share cost estimate is estimated to be \$67,749.

Mitigation Measure TC-2:

On-site improvements and improvements adjacent to the Project site shall be required in conjunction with the proposed development to ensure adequate circulation within the Project as provided in the TIA, Figure 56 Circulation Recommendations.

Mitigation Measure TC-3:

All roadway design, traffic signing and striping, and traffic control improvements relating to the proposed Project shall be constructed in accordance with applicable engineering standards and to the satisfaction of the County of San Bernardino Public Works Department.

Mitigation Measure TC-4:

Site-adjacent roadways shall be constructed or repaired at their ultimate half-section width, including landscaping and parkway improvements in conjunction with development, or as otherwise required by the County of San Bernardino Public Works Department.

Mitigation Measure TC-5:

In conjunction with standard County of San Bernardino development review procedures, on-site traffic signing and striping plans shall be prepared in accordance with applicable State and Federal standards.

Mitigation Measure TC-6:

Adequate off-street parking shall be provided to the satisfaction of County of San Bernardino Land Use Services based on supporting parking and density analysis prepared for the Project.

Mitigation Measure TC-7:

The final grading, landscaping, and street improvement plans shall demonstrate that sight distance standards are met in accordance with applicable County of San Bernardino/California Department of Transportation sight distance standards.

Mitigation Measure TC-8:

As is the case for any roadway design, the County of San Bernardino shall periodically review traffic operations in the vicinity of the Project once the Project is constructed to assure that the traffic operations are satisfactory.

Mitigation Measure TC-9:

A construction work site traffic control plan shall be submitted to the City of Redlands for review and approval prior to the start of any construction work. The plans shall show the location of any roadway, sidewalk, bike route, bus stop or driveway closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. Temporary traffic controls used around the construction area should adhere to the standards set forth in the California Manual of Uniform Traffic Control Devices (2014) and construction activities should adhere to applicable local ordinances. Site development would require the use of haul trucks during site clearing and excavation and the use of a variety of other construction vehicles throughout the construction work at the site. Transportation of heavy construction equipment and or materials, which requires the use of oversized vehicles, will require the appropriate transportation permit.

Less Than Significant with Mitigation Incorporated.

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

The Project Site occurs within the East Valley Area Plan and has a zoning land use designation of East Valley Special Development (EV/SD) as identified in the San Bernardino County East Valley Area Plan (EVSD). The EVSD is intended to allow a mix of residential, commercial, and/or manufacturing activities that maximize the utilization of natural as well as man-made resources. The Proposed Project is an acceptable use within the EV/SD District and therefore would result in an amount of vehicle miles traveled that is already anticipated by the General Plan and evaluated in the General Plan EIR. Therefore, the Proposed Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)(1). Therefore, no impacts have been identified or are anticipated, and no mitigation measures are required.

Less Than Significant Impact

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

The Proposed Project would not create substantial hazards due to site design feature or incompatible use. The driveway at Lugonia Avenue would serve as the main ingress and egress to the Proposed Project. A sight distance evaluation was conducted as part of the TIA. Sight distance is the continuous length of roadway visible to a driver traveling at a given speed. Based on the posted speed limit of 45 miles per hour on this section of Lugonia Avenue, vehicles would require 360 feet of stopping sight distance. Passenger cars exiting the Project driveway would require 495 feet of corner sight distance and semi-tractor trailer trucks would require up to 759 feet of line of sight for corner sight distance.

Given the relatively straight horizontal and vertical alignment of Nevada Street and Lugonia Avenue, physical roadway geometrics are not anticipated and no substantial obstructions would result. The landscape plan for the Project would be reviewed to ensure sight distance principals are implemented to avoid placing obstructions (such as dense trees or monument signs) within the limited use area on either side of the proposed Project access driveways. The area between the line of sight and the centerline of the nearest approaching lane is defined as the limited use area. The limited use area would be kept clear of obstructions, including landscaping over 18 inches in height to allow better visibility. It is recommended that trees within 50 feet of the driveway be outside of the limited-use area or as far back as reasonably possible. Ultimately, the final grading, landscaping, and street improvement plans would be required to demonstrate that sight distance standards are met in accordance with applicable County of San Bernardino/California Department of Transportation sight distance standards.

There are no incompatible uses (i.e., farm equipment) that occur within the Project vicinity. Discretionary actions for the Proposed Project by the County of San Bernardino includes approval of the Project design. Therefore, no impacts have been identified or are anticipated, and no mitigation measures are required.

Less than Significant Impact

- d) Result in inadequate emergency access?

During construction and long-term operation, the Project Proponent would be required to maintain adequate emergency access for emergency vehicles as required by the County. The Proposed Project design features will be reviewed and approved during the County's Site Plan review process to ensure that the Project would not impede emergency access. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

Less than Significant Impact

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
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XVIII. TRIBAL CULTURAL RESOURCES

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

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

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

SUBSTANTIATION:

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

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

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

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

In accordance with AB 52, the County of San Bernardino Land Use Services Department mailed out letters on April 24, 2019, to five tribes requesting information on projects received at the County. In

an e-mail from Travis Armstrong, Tribal Historic Preservation Officer for the Morongo Band of Mission Indians, dated May 14, 2019, a request for consultation was made. It was also expressed in the email that the proposed Project occurs within the ancestral territory and traditional use area of the Cahuilla and Serrano people of the Morongo Band of Mission Indians, and that projects within this area are potentially sensitive for buried deposits regardless of the presence of remaining surface artifacts and features. Mr. Armstrong requested a copy of the records search and any cultural assessments that had been made. In a follow up email sent on March 11, 2020, Mr. Armstrong, thanked the County for providing the requested reports and requested the close of consultation for the Project.

In an email provided on May 24, 2019, Ms. Jessica Mauck of the Cultural Resources Management Department for the San Manuel Band of Mission Indians (SMBMI), indicated that the proposed Project area occurs within a historic Sacred Lands File (SLF) for SMBMI and, therefore, is of interest to the Tribe. She further expressed that due to the existing level of disturbance within the proposed Project Site, SMBMI does not have any concerns with the Project's implementation, as planned, at this time, but requested that the following mitigation measures/conditions be made a part of the Project:

Mitigation Measure TCR-1:

In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed within TCR-3, regarding any finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.

Mitigation Measure TCR-2:

If significant cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to SMBMI for review and comment, as detailed within TCR-3. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.

Mitigation Measure TCR-3:

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

Mitigation Measure TCR-4:

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

Ms. Mauck requested that a final copy of the Project Conditions be provided for SMBMI's review. Ms. Mauck concluded her email by indicated that SMBMI had no additional input on the Project at this time and no additional consultation is required unless there is an unanticipated discovery of cultural resources during Project implementation.

Less than Significant Impact with Mitigation Incorporated

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
XVIX. UTILITIES AND SERVICE SYSTEMS - Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SUBSTANTIATION:

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

The proposed Project will not require or result in a need for new water or wastewater treatment facilities or expansion of existing facilities. There is sufficient capacity in the existing system for the proposed use. The proposed Project will be served by existing sewer and water lines in proximity to the Project, provided by the City of Redlands Municipal Utilities Department. The City of Redlands has a baseline water consumption level of 360 gallons per capita per day (GPCD) and has established a conservation target consumption of 290 GPCD. The proposed Project, including its water-efficient design features is anticipated to fall under the City's target rate. The reduced water consumption has a proportional effect on sewage disposal.

The proposed Project would provide onsite underground detention in addition to the water quality volume infiltration. A flow through underground detention basin comprised of large diameter perforated storm drainpipes for each subarea will be sized to accept the differential or increase in the runoff for a 100-year storm between the pre-project development condition and the post-project development condition.

Each subarea drainage system is designed to allow the initial storm water flow or water quality flow rate to pass directly to the water quality volume infiltration chamber. The water quality chambers are sized to capture and infiltrate 100 percent of the calculated water quality design volume. Flows and volumes from storm events greater than the initial runoff and water quality flow rates will continue through the storm drain system until the pre-developed condition flow rate is reached. Discharge to the storm drain system will be restricted to the pre-developed condition flow rate with the use of orifice control devices placed in the catch basin diversion structures. The flow greater than the pre-developed flow rate will be diverted to the detention basin chambers and the volume stored by a flow through detention basin.

Will serve letters were received from Edison, Southern California Gas Company and Frontier Communications, Inc. and indicated that available services and capacities exist in the area to serve the Project. The Project would not require or result in the construction or relocation of the above utilities which would result in significant environmental effects. Therefore, no impacts have been identified or are anticipated, and no mitigation measures are required.

Less than Significant Impact

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

The proposed Project will have sufficient water supplies available to serve the Project from existing entitlements and resources. The local water purveyor (City of Redlands Municipal Utilities Department) has indicated that it has adequate water service capacity to serve the projected demand for the Project in addition to the provider's existing commitments. According to the Regional Urban Water Management Plan, the average multi-family residence in the City of Redlands service area uses 2.66 acre-ft. per year, making the demand of the proposed Project 750 acre-ft. per year. The commitment by the City of Redlands indicates that the impact of the Project on water supplies will be less than significant. Therefore, no impacts have been identified or are anticipated, and no mitigation measures are required.

Less Than Significant Impact

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

The City of Redlands Municipal Utilities Department has notified the Project proponent and the County that the City will provide sewer collection and wastewater services to the Project. The City of Redlands Municipal Utilities Department has made the determination that it has adequate capacity to serve the projected wastewater treatment demand for the project, in addition to the provider’s existing commitments. Therefore, no impacts have been identified or are anticipated, and no mitigation measures are required.

Less than Significant Impact

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

The Project site occurs within the solid waste collection service area of the City of Redlands. Waste stream from the Project area is hauled to either the California Street Sanitary Landfill (City-operated) or the San Timoteo Sanitary Landfill (County-operated). Based on average waste generation rates published by CalRecycle for multi-family units (4 pounds per unit per day), the Project would generate approximately 1,128 pounds of solid waste per day or 206 tons of solid waste per year. Existing landfills serving the Project area have sufficient permitted capacity to accommodate the project’s solid waste disposal needs. Therefore, no impacts have been identified or are anticipated, and no mitigation measures are required.

Less than Significant Impact

- e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The proposed Project would comply with all federal, state, and local statutes and regulation related to solid waste. The Project would consist of short-term construction activities (with short-term waste generation limited to minor quantities of construction debris) and thus would not result in significant long-term construction waste generation. Post-construction waste generated by residents would be initially contained on-site in designated areas designed to Solid waste produced during the construction phase of the Project would be disposed of in accordance with all applicable regulations, including the County construction and demolition debris reduction ordinance. Therefore, no significant impacts related to landfill capacity are anticipated from the proposed Project. Therefore, no impacts have been identified or are anticipated, and no mitigation measures are required.

Less than Significant Impact

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				

- a) Substantially Impair and adopted emergency response plan or emergency evacuation plan?

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants, to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability or drainage changes? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

SUBSTANTIATION:

The County of San Bernardino adopted a Multi-Jurisdictional *Hazard Mitigation Plan* (HMP) approved by FEMA on July 13, 2017. The purpose of the HMP is to establish a plan for reducing and/or eliminating risks associated with flooding, earthquake, wildfire, hazardous material, and drought hazards within the County unincorporated areas. The HMP identifies mitigation goals, objectives, and projects to reduce risk; the recommendations and goals of the HMP have been incorporated into the County’s General Plan.

- a) Substantially Impair and adopted emergency response plan or emergency evacuation plan?

The Project Site does not contain any emergency facilities, nor does it serve as an emergency evacuation route. During construction and post-construction activities, the Project Proponent would be required to maintain adequate emergency access for emergency vehicles as required by the County. The Proposed Project would not impair an adopted emergency response plan or emergency evacuation plan. Therefore, no impacts have been identified or are anticipated, and no mitigation measures are required.

No Impact

- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants, to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

The Project Site occurs within an inland, urbanized area that is not located within or adjacent to an area that is susceptible to wildfires. In an effort to reduce the threat of wildfires, the San Bernardino County Fire Hazard Abatement Program enforces the fire hazard requirements outlined in San Bernardino County Code Section 23.0301–23.0319, including weed abatement. The primary function of the Fire Hazard Abatement Program is to reduce the risk of fires within communities by pro-actively establishing defensible space and reduction/removal of flammable materials on properties. Implementation of the Proposed Project would develop the site with buildings, paved drive aisles, walkways, parking areas and landscape, ultimately reducing the need for weed abatement and the potential for fire. No impacts have been identified or are anticipated, and no mitigation measures are required.

No Impact

- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The Project Site is located on the northside of Lugonia Avenue west of Nevada Street. Proposed off-site and on-site improvements include two driveways along Lugonia Avenue as well as installation of curb, gutter and sidewalk. The Proposed Project would connect to existing utilities and service systems within the area. The implementation of the Proposed Project would not require the construction or addition of new utilities and service system infrastructure. Therefore, the Proposed Project is not anticipated to require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary ongoing impacts to the environment. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

Less Than Significant

- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability or drainage changes?

The Project Site is located within a 500-year Floodplain (Zone X) which is defined as areas of 0.2 percent annual chance flood; areas of one percent annual chance flood with average depths of less than one-foot or with drainage areas less than one square-mile; and areas protected by levees from one percent annual chance flood. Implementation of the Proposed Project is not anticipated to impede or redirect flood flows within a 100-year flood zone.

As stated in Section X(c) of this Initial Study, the Proposed Project is not anticipated to substantially alter the existing drainage pattern of the site or area, substantially increase the rate or amount of surface runoff, or impede or redirect potential flood flows. In addition, the Project Site is not located in an area likely to become unstable as a result of on- or off-site landslides as the area is relatively flat. Additionally, the Project Site is located inland and does not occur within an area or adjacent to an area associated with the risk of wildland fires. Implementation of the Proposed Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, no impacts have been identified or are anticipated, and no mitigation measures are required.

No Impact

<i>Issues</i>	<i>Potentially Significant Impact</i>	<i>Less than Significant with Mitigation Incorporated</i>	<i>Less than Significant Impact</i>	<i>No Impact</i>
XXI. MANDATORY FINDINGS OF SIGNIFICANCE:				

- a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal

community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

- b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?
- c) Does the project have environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly?

SUBSTANTIATION:

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

The Habitat Assessment prepared for the Project Site concluded that all direct, indirect, and cumulative impacts would be reduced to a less than significant impact with implementation of Mitigation Measures BIO-1. Therefore, the Proposed Project is not anticipated to have the potential to significantly degrade the overall quality of the region’s environment, or substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population or 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. Potential impacts to cultural resources were identified in the Cultural Resources Investigation prepared for the Proposed Project. As discussed in this Initial Study, all direct, indirect, and cumulative can be reduced to a less than significant level with implementation of Mitigation Measures CR-1 through CR-2. Adherence to mitigation measures as presented in this Initial Study would ensure that important examples of the major periods of California history or prehistory are not eliminated as a result of the Proposed Project. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Less than Significant Impact

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

Cumulative impacts are defined as two or more individual affects that, when considered together, are considerable or that compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the development when added to the impacts of other closely related past, present, and reasonably foreseeable or probable future developments. Cumulative impacts can result from individually minor, but collectively significant, developments taking place over a period. The CEQA Guidelines, Section 15130 (a) and (b), states:

- (a) Cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable.
- (b) The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided of the effects attributable to the project. The discussion should be guided by the standards of practicality and reasonableness.

Impacts associated with the Proposed Project would not be considered individually or cumulatively adverse or considerable. Impacts identified in this Initial Study can be reduced to a less than significant impact. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

Less than Significant Impact

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

The incorporation of design measures, County of San Bernardino policies, standards, and guidelines and proposed mitigation measures as identified within this Initial Study would ensure that the Proposed Project would have no substantial adverse effects on human beings, either directly or indirectly on an individual or cumulative basis. Therefore, no impacts have been identified or are anticipated, and no mitigation measures are required.

Less than Significant Impact

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